ADDENDUM TO
THE CARSON 2040 GENERAL PLAN UPDATE EIR

21611 Perry Street Project

PREPARED FOR:
City of Carson
Community Development
701 E. Carson Street
Carson, CA 90745

PREPARED BY:
CAJA Environmental Services
9410 Topanga Canyon Boulevard, Suite 101
Chatsworth, CA 91311

February 2025

1. TABLE OF CONTENTS

List of Tables Page

ATTACHMENTS

1 INTRODUCTION

This document is an Addendum to the Environmental Impact Report (EIR) prepared for the Carson 2040 General Plan Update (General Plan Update) (State Clearinghouse No. 2001091120, December 2022), which was certified by the City of Carson (City) on April 4, 2023 (Certified EIR). The Certified EIR may be viewed at the following link: https://www.carson2040.com/. In accordance with the California Environmental Quality Act (CEQA), this Addendum to the Certified EIR analyzes a proposed residential development project on a site analyzed as part of the General Plan Update (the Modified Project) and demonstrates that the Modified Project does not present any of the circumstances requiring the preparation of a Supplemental or Subsequent EIR pursuant to Public Resources Code, Section 21166 or CEQA Guidelines Section 15162 and 15163.

1.1 BACKGROUND

The City prepared an EIR pursuant to the CEQA for the General Plan Update to assess potential environmental impacts of the General Plan Update. The EIR concluded that, with mitigation, all of the environmental impacts of the General Plan Update would be less than significant, with the exception of significant and unavoidable environmental impacts related to Air Quality, Cultural Resources (Historic), and Transportation (VMT).

In April 2023, the City certified the EIR and approved the General Plan Update. Subsequent to approval of the General Plan Update, the Applicant of the 21611 Perry Street Project has proposed a residential development project on a site analyzed as part of the General Plan Update (Modified Project).

Both the Approved General Plan Update (as analyzed in the Certified EIR) and the Modified Project (analyzed in this Addendum) are discussed further below.

1.2 CEQA AUTHORITY FOR AN ADDENDUM

CEQA establishes the type of environmental documentation required when changes to a project occur after an EIR is certified. Specifically, Section 15164(a) of the CEQA Guidelines states that:

> *The lead agency or responsible agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred.*

CEQA Guidelines Section 15162 requires the preparation of a Subsequent EIR when an EIR has been certified or a negative declaration has been adopted for a project and one or more of the following circumstances exist:

> *(1) Substantial changes are proposed in the project which, will require major revisions of the previous EIR or negative declaration due to the involvement of new*

significant environmental effects or a substantial increase in the severity of previously identified significant effects;

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

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

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

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

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

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

Likewise, California Public Resources Code (PRC) Section 21166 states that unless one or more of the following events occur, no Supplemental or Subsequent EIR shall be required by the lead agency or by any responsible agency:

(a) Substantial changes are proposed in the project which will require major revisions of the environmental impact report;
(b) Substantial changes occur with respect to the circumstances under which the project is being undertaken which will require major revisions in the environmental impact report; or
(c) New information, which was not known and could not have been known at the time the environmental impact report was certified as complete, becomes available.

As demonstrated by the analysis in this document, the Modified Project would not result in any new significant impacts, nor would it substantially increase the severity of previously identified significant impacts or present any of the other circumstances identified in CEQA Guidelines, section 15162 or PRC, section 21166 that would require the preparation of a supplemental or subsequent EIR. Rather, all of the impacts

associated with the Modified Project are within the envelope of impacts analyzed in the Certified EIR and do not constitute a new or substantially increased significant impact. Therefore, the modifications resulting from the Modified Project do not meet the criteria for a Supplemental or Subsequent EIR pursuant to Public Resources Code, Section 21166 and CEQA Guidelines Section 15162 and 15163.

2 PROJECT DESCRIPTION

2.1 EXISTING SETTING

The 2.8-acre Project Site is located in the City of Carson (City) at 21611 South Perry Street. The Project Site comprises assessor parcel numbers (APNs) 7327-010-014 and -015. The site is bounded by Dominguez Channel to the west, Perry Street to the east, residential homes to the north, and Carson Street to the south. The Project Site is located in an urban setting generally surrounded by residential and commercial land uses. The site is a relatively flat area and undulates between approximately 15 and 20 feet above mean sea level (amsl).

The Project Site includes ornamental landscaping from a previous development near an existing fence along the site's southwest border, within a concrete curb along its southern and southeastern border, and along Perry Street parallel to the site's eastern border. The remainder of the Project Site includes non-native grassland that extends west to Dominguez Channel, which is a concrete lined drainage channel west of the site. The General Plan land use designation for the Project Site is Corridor Mixed-Use (CMU), and the zoning for the site is Perry Street Specific Plan.

2.2 PROJECT CHARACTERISTICS

The Modified Project includes development of the site with 10 residential buildings accommodating a total of 62 residential dwelling units, and associated vehicle parking, open space and recreational amenities, onsite circulation, and utility infrastructure.

All buildings would reach three stories and a maximum height of 38 feet and 9 inches. A breakdown of the bedroom count is included in Table 1.

Table 1
Bedroom Count Breakdown

Bedroom Count	Amount
2 Bedroom	8 du
3 Bedroom	27 du
4 Bedroom	27 du
Total	**62 du**

du = dwelling unit

Source: ktgy Architecture + Planning, November 18, 2024.

Open Space

As shown in Table 2, the Modified Project would include a total of 33,793 square feet of open space. Open space amenities included as part of the Modified Project include an outdoor seating and dining area, a barbeque island, lawn areas, and a pedestrian paseo.

Table 2
Modified Project Open Space

Open Space	Amount
Private Open Space (Patios)	4,722 sf
Common Open Space	29,071 sf
Total	**33,793 sf**

sf = square feet

Source: ktgy Architecture + Planning, November 18, 2024.

Parking

The Modified Project is required to provide a minimum total of 123 vehicle parking spaces. The Modified Project would provide 150 vehicle parking spaces, exceeding the number required by 27 spaces. Vehicle parking for Project residents would be provided in individual garages included as part of the residential structures, while an additional 26 open spaces would be accessible throughout the site.

Access and Circulation

Vehicular access to the Modified Project would be provided via a single full access driveway on Perry Street that would provide access to the private driveway circulating onsite. Emergency Vehicle Access (EVA) only would be provided via a secondary driveway on Carson Street.

Estimated Construction Schedule

As shown in Table 3, the Modified Project's construction phase would occur over approximately 16 months, with buildout of the Modified Project anticipated in 2026.

Table 3
Estimated Construction Schedule and Assumptions

Phase	Duration	Notes
Site Preparation	Month 1	Grubbing and removal of 32 trees on-site and four municipal trees, plants, landscaping, weeds
Grading	Months 2-3	Approximately 4,590 cubic yards of soil imported 40 miles to site in 14-cubic yard capacity trucks.
Trenching	Months 4-16	Trenching for utilities, including gas, water, electricity, and telecommunications.
Building Construction	Months 4-16	Footing and foundation work (e.g., pouring concrete pads), framing, welding; installing mechanical, electrical, and plumbing. Floor assembly, cabinetry and carpentry, elevator installations, low voltage systems, trash management.
Paving	Months 5-6	Flatwork, including paving of driveways and walkways
Architectural Coatings	Months 9-16	Application of interior and exterior coatings and sealants.

Source: DKA Planning, 2024.

2.3 REQUESTED PERMITS AND APPROVALS

The Applicant is requesting the following approvals:

- Development and Site Plan Review
- Vesting Tentative Tract Map for condominium purposes to merge the two existing parcels into a single ground lot.
- Specific Plan Amendment to amend the Perry Street Specific Plan to allow the Project on the site;
- General Plan Amendment to amend the description of the Corridor Mixed Use land use designation in the Land Use and Revitalization Element
- Amendment to Development Agreement No. 27-21

3 ENVIRONMENTAL IMPACT ANALYSIS

The information below addresses each of the environmental issues that were previously analyzed within the scope of the previously adopted EIR for the General Plan Update and the most current Appendix G of the CEQA Guidelines. An Environmental Checklist Form was used to compare the anticipated environmental effects of the Modified Project with those disclosed in the Certified EIR and to review whether any of the conditions set forth in CEQA Guidelines Section 15162 and PRC Section 21166, requiring preparation of a Supplemental or Subsequent EIR, have been triggered.

The checklist and evaluation below provide the following information for each of these environmental impact categories:

1 IMPACT DETERMINATION IN THE CERTIFIED EIR: This section lists the impact determination made in the Certified EIR for each impact category.

2 DO PROPOSED CHANGES INVOLVE NEW SIGNIFICANT IMPACTS OR SUBSTANTIALLY MORE SEVERE IMPACTS? Pursuant to CEQA Guidelines Section 15162(a)(1), this section indicates whether the Modified Project would result in new significant impacts that have not already been considered and mitigated by the prior environmental review or would result in a substantial increase in the severity of a previously identified impact.

3 ANY NEW CIRCUMSTANCES INVOLVING NEW IMPACTS OR SUBSTANTIALLY MORE SEVERE IMPACTS? Pursuant to CEQA Guidelines Section 15162(a)(2), this section indicates whether there have been changes to the Project Site or the vicinity (circumstances under which the project is undertaken) which have occurred subsequent to the prior environmental documents, which would result in the Modified Project having new significant environmental impacts that were not considered in the prior environmental documents or that substantially increase the severity of a previously identified impact.

4 ANY NEW INFORMATION REQUIRING NEW ANALYSIS OR VERIFICATION? Pursuant to CEQA Guidelines Section 15162(a)(3)(A-D), this section indicates whether new information of substantial importance which was not known and could not have been known with the exercise of reasonable diligence at the time the previous environmental documents were certified as complete is available, requiring an update to the analysis of the previous environmental documents to verify that the environmental conclusions and mitigations remain valid. If the new information shows that:

(A) The project will have one or more significant effects not discussed in the prior environmental documents;

(B) Significant effects previously examined will be substantially more severe than shown in the prior environmental documents;

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

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

then the question would be answered “Yes”, requiring the preparation of a Supplemental or Subsequent EIR. However, if the additional analysis completed as part of this environmental review finds that the conclusions of the prior environmental documents remain unchanged and no new significant impacts are identified, or identified environmental impacts are not found to be more severe, or there are no additional mitigation measures or alternatives now available or feasible but declined for adoption by the project proponent, then the question would be answered ”No” and no Supplemental or Subsequent EIR is required. New studies completed as part of this environmental review are attached to this Addendum or are on file with the Planning Department.

5 MITIGATION MEASURES ADDRESSING IMPACTS: Pursuant to CEQA Guidelines Section 15162(a)(3), this section indicates whether the prior environmental document provides mitigation measures to address effects in the related impact category. If so, a “Yes” response will be provided. In some cases, the previously adopted mitigation measures have already been implemented or are not applicable to the Modified Project, or a significant impact was not identified and mitigation was not required. In either instance, a “No” response will be indicated.

6 CONCLUSION: For each environmental topic, a discussion of the conclusion relating to the analysis is provided.

3.1 AESTHETICS

Issues (and Supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
AESTHETICS: Except as provided in Public Resources Code Section 21099, would the project:					
(a) Have a substantial adverse effect on a scenic vista?	Less Than Significant	No	No	No	No
(b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	No Impact	No	No	No	No
(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	No	No	No	No
(d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	Less Than Significant	No	No	No	No

Impacts related to aesthetics are discussed in the Certified EIR on pages 3.1-1 through 3.1-12.

3.1.1 Impact Determination in the EIR

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

The Certified EIR concluded that the General Plan Update introduces land use changes throughout the City. In most cases, the land use change sites are located in or near already developed areas and coincide with areas designated for development under the existing General Plan. By focusing development in infill areas, the General Plan Update relieved pressure to develop in open space and natural areas while filling visual gaps in existing neighborhoods. This allows for the preservation of open space views and the enhancement of urban views. The Planning Area is mainly characterized by urban environments, and as a result, scenic vistas are mostly limited to open space, vacant natural areas, and parks. The General Plan Update includes several policies identified on pages 3.1-5 through 3.1-8 of the Certified EIR pertaining to preserving these resources and their scenic qualities. Policies include context-specific design of new development and promoting infill development within Carson's central core. Individual development projects would still be subject to development and planning review and must therefore conform to zoning and other ordinances regarding aesthetic qualities such as lighting, signage, landscaping, and building setbacks. Due to the focus on infill development in the General Plan Update and policies that ensure that new development would have minimal

impact on open spaces and other scenic resources, the impact of the General Plan Update on the City's scenic vistas was found to be less than significant.

(b) Would the Project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

The Certified EIR concluded that no adopted or eligible state scenic highway is located in Carson. Given that no adopted or eligible state scenic highways are located within the Planning Area, and that polices of the General Plan Update would that ensure that new development would have minimal impact on open spaces and other scenic resources, no impact will occur.

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

The Certified EIR concluded that the Planning Area consists of the City and portions of unincorporated Los Angeles County, which constitutes Carson's Sphere of Influence (SOI). Zoning and other regulations governing scenic quality applicable to the City include Carson Municipal Code provisions relating to development review and subdivision design. Policies in the General Plan Update identified on page 3.1-5 through 3.1-8 of the Certified EIR are intended to complement and further the intent of these provisions regulating scenic quality and resources and design guidelines, and any development occurring under the General Plan Update would be subject to regulations in the Carson Municipal Code.

For these reasons, the impact of the General Plan Update on scenic quality within the City was thus determined to be less than significant. The General Plan Update does not anticipate significant land use changes within the unincorporated SOI. Rather, land use designations reflect existing uses and are generally intended to provide consistency with the General Plan update in the event that land within the SOI is annexed into City limits. In addition, the Los Angeles County General Plan and Code of Ordinances contain provisions that would protect any scenic resources. The General Plan Update would therefore not substantially degrade the existing visual character or quality of public views of the SOI and its surroundings, and thus, the impact of the General Plan Update on scenic quality within the SOI was found to be less than significant.

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

The Certified EIR concluded that new development resulting from implementation of the General Plan Update would necessitate the use of additional light fixtures and would contribute to existing conditions of light and glare. New light sources may include

residential and non-residential interior and exterior lighting, parking lot lighting, commercial signage lighting, and lamps for streetscape and public recreational areas. Most new development resulting from the General Plan Update would take place in or near developed and urbanized areas, where moderate light and glare already exist, and would not be out of character with the urban environment. The General Plan Update includes policies related to buffering between development and sensitive habitats, and between new development and existing uses. Finally, the Carson Municipal Code contains provisions that would limit light and glare for new non-residential and residential development. With these measures in place, the impact of the General Plan Update with respect to light and glare was found to be less than significant.

3.1.1 Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

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

The Modified Project includes development of an infill site with 62 residential dwelling units, the existing zoning (Perry Street Specific Plan) and land use designation (Corridor Mixed Use) for the site, as amended by the General Plan Amendment and Specific Plan Amendment that are part of the Modified Project. Consistent with the Certified EIR, the Modified Project would be required to conform to General Plan Update policies (LUR-P-18, LUR-P-20, OSEC-G-4, OCEC-G-5, OSEC-P-5, and OSEC-P-6), zoning, and other ordinances regarding aesthetic qualities such as lighting, signage, landscaping, and building setbacks, all of which ensures that the Modified Project will have minimal impact on open spaces and other scenic resources. Thus, the Modified Project would not have a substantial adverse effect on a scenic vista. Therefore, the Modified Project would not result in new or increased significant impacts beyond those identified in the Certified EIR.

(b) Would the Project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

The Project Site is not visible from any designated stated scenic highway. Thus, the Modified Project would not substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway. Therefore, the Modified Project would not result in new or increased significant impacts beyond those identified in the Certified EIR.

(c) In non-urbanized areas, would the Project substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from a 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?

The Modified Project includes development of an infill site located in an urban area with 62 residential dwelling units, allowed under the existing zoning and land use designation

for the site, as amended by the General Plan Amendment and Specific Plan Amendment that are part of the modified project, . The Modified Project would be required to comply with applicable General Plan Update policies (LUR-P-18, LUR-P-20, OSEC-G-4, OCEC-G-5, OSEC-P-5, and OSEC-P-6), zoning, the City's Municipal Code, and other regulations governing scenic quality. Thus, the Modified Project would not conflict with applicable zoning and other regulations governing scenic quality. Therefore, the Modified Project would not result in new or increased significant impacts beyond those identified in the Certified EIR.

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

The Modified Project includes development of an infill site located in an urban area with 62 residential dwelling units, allowed under the existing zoning and land use designation for the site, as amended by the General Plan Amendment and Specific Plan Amendment that are part of the Modified Project . The Modified Project would be required to comply with applicable General Plan Update policies (LUR-P-18, LUR-P-20, OSEC-G-4, OCEC-G-5, OSEC-P-5, and OSEC-P-6) and the City's Municipal Code regulations that limit light and glare for new residential development. Thus, the Modified Project would not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area. Therefore, the Modified Project would not result in new or increased significant impacts beyond those identified in the Certified EIR.

3.1.2 Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

No. As discussed above, the Modified Project would not result in any new or more severe significant impacts beyond what were identified in the Certified EIR.

3.1.3 Any New Information Requiring New Analysis or Verification?

No. There is no new information requiring new analysis or verification.

3.1.4 EIR's Mitigation Measures Addressing Impact

None required.

3.1.5 Conclusion

As discussed above, the Modified Project would not result in any of the conditions set forth in PRC Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Supplemental or Subsequent EIR.

3.1 AGRICULTURE AND FORESTRY RESOURCES

Issues (and supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
AGRICULTURE AND FORESTRY RESOURCES: Would the project:					
(a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	No Impact	No	No	No	No
(b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	No Impact	No	No	No	No
(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 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?	No Impact	No	No	No	No
(d) Result in the loss of forest land or conversion of forest land to non-forest use?	No Impact	No	No	No	No
(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	No	No	No	No

Impacts related to agricultural resources are discussed in the Certified EIR on pages 5-1 and 5-2.

3.2.1 Impact Determination in the EIR

The Certified EIR concluded that there are no agricultural resources in the Planning Area, and no impacts related to any of the subcategories listed above will occur as a result of the General Plan Update.

3.2.2 Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

As stated above, there are no agricultural resources in the Planning Area, which includes the Project Site. Thus, the Modified Project would not result in any impacts related to agricultural resources. Therefore, the Modified Project would not result in a new or increased significant impacts beyond those identified in the Certified EIR.

3.2.3 Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

No. As discussed above, the Modified Project would not result in any new or more severe significant impacts beyond what were identified in the Certified EIR.

3.2.4 Any New Information Requiring New Analysis or Verification?

No. There is no new information requiring new analysis or verification.

3.2.5 EIR's Mitigation Measures Addressing Impact

None required or identified.

3.2.6 Conclusion

As discussed above, the Modified Project would not result in any of the conditions set forth in PRC Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Supplemental or Subsequent EIR.

3.3 AIR QUALITY

Issues (and supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
AIR QUALITY: Would the project:					
(a) Conflict with or obstruct implementation of the applicable air quality plan?	Less Than Significant	No	No	No	No
(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?	Significant and Unavoidable	No	No	No	Yes
(c) Expose sensitive receptors to substantial pollutant concentrations?	Significant and Unavoidable	No	No	No	Yes
(d) Result in other emissions (such as those leading to odors adversely affecting a substantial number of people?	Significant and Unavoidable	No	No	No	Yes

Impacts related to air quality are discussed in the Certified EIR on pages 3.2-1 through 3.2-56.

3.3.1 Impact Determination in the EIR

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

The Certified EIR states that general plans be evaluated for consistency with the current Air Quality Management Plan (AQMP). Because the AQMP strategy is based on projections from local general plans, only new or amended general plan elements, specific plans, or individual projects under the general plan need to undergo a consistency review. Projects considered consistent with the local general plan are concluded consistent with the air quality-related regional plan. Indicators of consistency include:

- Control Strategies: Whether implementation of a project would increase the frequency or severity of existing air quality violations; would cause or contribute to new violations; or would delay the timely attainment of AAQS or interim emissions reductions within the AQMP.

- Growth Projections: Whether implementation of the project would exceed growth assumptions within the AQMP, which in part, bases its strategy on growth forecasts from local general plans.

Construction

Control Strategies

The Certified EIR stated that the Air Basin is designated nonattainment for ozone (O_3) and particulate matter 2.5 ($PM_{2.5}$) under the California Ambient Air Quality Standards (CAAQS) and the National Ambient Air Quality Standards (NAAQS), nonattainment for lead (Los Angeles County only) under the NAAQS, and nonattainment for particulate matter 10 (PM_{10}) under the CAAQS. The General Plan Update considers long-term growth associated with buildout of the City. Thus, the emissions of criteria pollutants associated with future developments under the General Plan Update could exceed SCAQMD thresholds for criteria pollutants.

Future development under the General Plan Update will be required to comply with the California Air Resources Board's (CARB) requirements to minimize short-term emissions from on-road and off-road diesel equipment, including the Airborne Toxic Control Measure (ATCM) to limit heavy-duty diesel motor vehicle idling to no more than 5 minutes at any given time, and with SCAQMD's regulations such as Rule 403 for controlling fugitive dust and Rule 1113 for controlling volatile organic compound (VOC) emissions from architectural coatings. Furthermore, as applicable to the type of growth, individual projects under the General Plan Update are required to comply with fleet rules to reduce on-road truck emissions. Compliance with these measures and requirements will be consistent with and meet or exceed the AQMP requirements for control strategies intended to reduce emissions from construction equipment and activities. Therefore, the Certified EIR concluded that the construction anticipated by the General Plan Update will be consistent with the AQMP under the first indicator.

Growth Projections

The Certified EIR concluded that the General Plan Update will result in an increase in short-term employment compared to existing conditions. Although the construction anticipated by the General Plan Update would generate construction workers, it would not necessarily create new construction jobs; construction-related jobs generated by the General Plan Update will likely be filled by employees within the construction industry within the City and the greater Los Angeles County region. Construction industry jobs generally have no regular place of business, as construction workers commute to job sites throughout the region, which may change several times a year. Moreover, these jobs would be temporary in nature. Therefore, the Certified EIR concluded that the construction jobs generated by the General Plan Update would not conflict with the long-term employment or population projections upon which the AQMPs are based.

Operation

Control Strategies

Future development under the General Plan Update will be required to comply with CARB motor vehicle standards, SCAQMD regulations for stationary sources and architectural coatings, Title 24 energy efficiency standards, and to the extent applicable, to the growth projections in the 2016–2040 RTP/SCS, which are incorporated into the 2016 AQMP.

The AQMP includes land use and transportation strategies from the 2016–2040 RTP/SCS that are intended to reduce VMT and resulting regional mobile source emissions. The applicable land use strategies include: planning for growth around livable corridors; providing more options for short trips/neighborhood mobility areas; supporting zero emission vehicles and expanding vehicle charging stations; and supporting local sustainability planning. The applicable transportation strategies include: managing through the Transportation Demand Management (TDM) Program and the Transportation System Management (TSM) Plan including advanced ramp metering, and expansion and integration of the traffic synchronization network; and promoting active transportation. The majority of the transportation strategies are to be implemented by cities, counties, and other regional agencies such as the Southern California Association of Governments (SCAG) and SCAQMD, although some can be furthered by individual development projects.

The location, design, and land uses of the growth anticipated by the General Plan Update will implement land use and transportation strategies related to reducing vehicle trips for residents and employees of the City by increasing commercial and residential density with over 95 percent of new residential development planned for multi-family dwelling units, which would allow for increased mixed-use density at infill locations and near public transit. Several transit agencies provide local and regional transit service to the residents of Carson, including Metro, Long Beach Transit, Compton Renaissance Transit, Gardena Transit, and Torrance Transit. Several routes in Carson provide access to the Metro A (Blue) Line, which passes through the eastern edge of Carson without stops. The Harbor Gateway Transit Center is located just west of the City, adjacent to I-110. This transit center is a stop on the Metro Silver Line, which provides critical regional access to downtown Los Angeles and east to the El Monte Station. Connection to the Transit Center is provided by Metro Lines 52 and 246. Both Long Beach Transit and Torrance Transit provide access to Long Beach, including the Long Beach Transit Gallery, located at the downtown Long Beach A Line station. Torrance Transit also provides access to the South Bay, including to the South Bay Galleria Transit Center and the Redondo Beach Pier.

The General Plan Update focused on infill development and revitalization to help the City transition from a predominantly industrial and suburban community to a complete City with an integrated mix of housing, employment, educational, cultural, and recreational options balanced with industrial uses. These efforts are targeted in the Core and in centers around the Core, expanding on recent development along Carson Street.

Development in the centers, along key corridors, and large opportunity sites such as the Shell property on East Del Amo Boulevard and South Wilmington Avenue are envisioned to be connected by community-oriented Boulevards that feature public gathering spaces and pedestrian- and bicycle-oriented designs. New land use designations that introduce greater flexibility through emphasis on mixed uses instead of single uses were to facilitate development to achieve this vision and respond to the need to accommodate the City's growing and diverse population.

The General Plan Update outlined strategies for greater integration of uses in different parts of the City and a better connection between employment and residential uses, with more areas designated for mixed-use development. It recognizes the physical elements that help define the character of Carson, including existing residential neighborhoods, downtown Core, industrial/business centers, and corridors. This structure helps establish a clear multi-modal network throughout the City by focusing on both community destinations as well as the efficiency, safety, and convenience of the modes of transportation in between. Higher densities, especially in mixed-use designations, increase capacity for residential development near community-serving commercial, retail, and office uses as well as schools, parks, and recreational facilities, and improvements to the bicycle, pedestrian, and road networks will make it easier for residents to travel throughout the community. Therefore, the General Plan Update does not conflict with AQMP land use and transportation strategies that are intended to reduce VMT and resulting regional mobile source emissions and would result in a less than significant impact associated with air quality. The Certified EIR concluded that the General Plan Update is consistent with the AQMP under the first indicator.

Growth Projections

The emissions inventory for the Air Basin is formed, in part, by existing City and county general plans. The AQMP is based on population, employment and VMT forecasts by SCAG. A project might be in conflict with the AQMP if the development is greater than that anticipated in the local general plan and SCAG's growth projections. Future development in the City that is consistent with the General Plan Update will increase vehicle trips and VMT that would result in emissions of ozone precursors and particulate matter.

Individual projects under the General Plan Update will be required to undergo subsequent environmental review pursuant to CEQA and will be required to demonstrate compliance with the AQMP. Individual projects will also be required to demonstrate compliance with SCAQMD rules and regulations governing air quality.

The City continues to coordinate with SCAQMD and SCAG to ensure City-wide growth projections, land use planning efforts, and local development patterns are accounted for in the regional planning and air quality planning processes. Therefore, the operation of the General Plan Update would not conflict with or obstruct the implementation of the applicable air quality plan. Applicable General Plan policies listed on pages 3.2-27

through 3.2-42 of the Certified EIR will potentially reduce emissions, which will address potential impacts related to conflicts with an applicable air quality plan. The Certified EIR concluded that impacts related to AQMP consistency would be less than significant.

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

Construction

The Certified EIR stated that construction has the potential to create regional air quality impacts through the use of heavy-duty construction equipment and through vehicle trips generated by construction workers and haul trips traveling to and from each specific project site. In addition, fugitive dust emissions would result from construction activities. During the finishing phase, the application of architectural coatings (i.e., paints) and other building materials would release VOCs. Construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of operation and, for dust, the prevailing weather conditions. However, as there are no specific projects currently approved or proposed under the General Plan Update and there is no knowledge as to timing of construction, location or the exact nature of future projects, analysis of construction emissions is speculative at best. Information regarding specific development projects, including specific buildings and facilities proposed to be constructed, construction schedules, quantities of grading, and other information will be required in order to provide a meaningful estimate of emissions. Since this information is unknown, emissions modeling is not feasible.

Each future project developed under the General Plan Update will be required to comply with SCAQMD rules and regulations as well as conduct their own applicable CEQA analysis and would determine significance based on the individual project specifics. Furthermore, future construction activities under the General Plan Update will be required to comply with the CARB ATCM, which limits diesel powered equipment and vehicle idling to no more than five minutes at a location, and the CARB In-Use Off-Road Diesel Vehicle regulation, CARB Truck and Bus regulation, and CARB ACT regulation, which all require construction equipment and vehicle fleet operators to repower or replace higher-emitting equipment with less polluting models, including zero- and near-zero-emissions on-road truck technologies as they become developed and commercially available. Additionally, construction of future development will be required to comply with SCAQMD rules and regulations including Rule 403 for the control of fugitive dust and Rule 1113 for the control of VOC emissions from architectural coatings. Mandatory compliance with these CARB and SCAQMD rules and regulations will reduce emissions, particularly for nitrogen oxide (NO_x), PM_{10}, and $PM_{2.5}$, during future construction activities under the General Plan Update.

Mitigation Measures MM-AQ-1 and MM-AQ-2 were identified in the Certified EIR to reduce construction-related pollutant emissions for development under the General Plan.

Even with mandatory compliance with CARB and SCAQMD rules regulations and with implementation of Mitigation Measures MM-AQ-1 and MM-AQ-2, the Certified EIR concluded that it is possible that some future development projects could be large enough in scale and/or intensity such that many pieces of heavy-duty construction equipment and/or heavy-duty trucks may be required and that construction period emissions could exceed the SCAQMD significance thresholds. Therefore, the Certified EIR concluded that construction activities could result in a significant and unavoidable regional air quality impact.

Operation

The Certified EIR stated that operation of future development under the General Plan Update will generate criteria pollutant emissions from vehicle trips traveling within the City, energy sources such as natural gas combustion, and area sources such as landscaping equipment and consumer products usage. The on-road mobile sources related to the operation of the General Plan Update include passenger vehicles, onsite use of off-road equipment, and delivery trucks. VMT data, takes into account ridership, mode, and distance on freeways and local streets.

The net change in operational emissions from existing conditions compared to existing-plus-buildout of new development under the General Plan Update will not exceed the SCAQMD regional significance thresholds. The net change in emissions at 2040 buildout would be negative compared to existing conditions primarily due to the focus of the General Plan Update on infill development and revitalization to help the City achieve an integrated land use mix that accommodates growth while reduces VMT and associated emissions, improvements in vehicle emissions standards and, to a lesser extent, improvements in building energy efficiency standards. It should be noted that the SCAQMD thresholds were specifically developed for use in determining significance for individual projects and not for program-level documents, such as the General Plan. Furthermore, development of the new residential and non-residential uses will be based on market demand and would be constructed over the buildout duration through 2040. Overlapping emissions from the construction and operation of new phased development could occur under the General Plan Update, and the SCAQMD requires such overlapping emissions to be compared to the numeric thresholds for operations. It is possible that some future development projects could be large enough in scale and/or intensity such that overlapping emissions from the construction and operation of new phased development could exceed the SCAQMD significance thresholds and result in a significant regional air quality impact.

The General Plan policies identified on pages 3.2-39 through 3.2-42 of the General Plan EIR and Mitigation Measures MM-AQ-3 through MM-AQ-5 will potentially reduce emissions and could potentially address impacts. In addition, future development under the General Plan Update will be required to conduct their own CEQA analysis and would determine significance based on the individual project specifics. Through each project's individual environmental review process, potential impacts will be identified and

compared against relevant thresholds. Individual projects that exceed the thresholds would normally result in a potentially significant impact and require mitigation. However, the Certified EIR concluded that operational air quality impacts under the General Plan Update would be significant and unavoidable.

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

Construction

The Certified EIR concluded that construction of future individual projects under the General Plan Update has the potential to create localized air quality impacts through the use of heavy-duty construction equipment and through vehicle trips generated by construction workers and haul trips traveling to and from the project site. In addition, fugitive dust emissions would result from construction activities. During the finishing phase, the application of architectural coatings (i.e., paints) and other building materials would release VOC emissions. Construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of operation and, for dust, the prevailing weather conditions.

The SCAQMD provides guidance for conducting the analysis of localized emissions in their Localized Significance Threshold Methodology, which relies on on-site mass emission rate screening tables and project-specific dispersion modeling typically for sites sized one, two, and five acres. The SCAQMD has established screening criteria that can be used to determine the maximum allowable daily emissions that would satisfy the localized significance thresholds and therefore not cause or contribute to an exceedance of the applicable ambient air quality standards without project-specific dispersion modeling. The screening criteria depend on: (1) the area in which the project is located; (2) the size of the project area; and (3) the distance between the project area and the nearest sensitive receptor. The localized significance thresholds are applicable to NO_x, carbon monoxide (CO), PM_{10}, and $PM_{2.5}$. Should individual projects exceed applicable screening level thresholds in the SCAQMD Localized Significance Threshold Methodology (or successor guidance document), project-specific dispersion modeling may be conducted to demonstrate that no exceedance of the concentration-based thresholds (from which the screening tables are derived) would occur.

Concentrations of TACs, or in federal parlance, hazardous air pollutants (HAPs), are also used as indicators of ambient air quality conditions. Sensitive receptors maybe located within close proximity to future projects under the General Plan Update. SCAQMD recommends that construction health risk assessments be conducted for substantial sources of diesel particulate matter (DPM) emissions (e.g., projects with substantial construction activities, such as earth-moving and excavation construction activities) in proximity to sensitive receptors and has provided guidance for analyzing mobile source diesel emissions. Localized DPM emissions strongly correlate with localized $PM_{2.5}$ emissions. However, localized analysis does not directly measure health risk impacts.

Therefore, future projects under the General Plan Update may potentially require project-specific dispersion modeling to evaluate potential health risk impacts associated with construction.

However, there are no specific projects currently approved or proposed under the General Plan Update and there is no information regarding specific development projects, including specific buildings and facilities proposed to be constructed, construction schedules, quantities of grading, and other information that would be required in order to provide a meaningful estimate of emissions. Since this information is unknown, emissions modeling is not feasible and would be speculative at best. Each future project developed under the General Plan Update will be required to conduct their own CEQA analysis and will determine significance based on the individual project's specifics. Through each project's individual environmental review process, localized emissions may be quantified and compared against project-specific thresholds. Individual projects that exceed the thresholds would normally be considered significant and require mitigation.

Mitigation Measures MM AQ-6 and MM AQ-7 were identified in the Certified EIR to reduce construction pollutant emissions. Nonetheless, because potential new development could occur close to existing sensitive receptors, the development that will be accommodated by the General Plan Update has the potential to expose sensitive receptors to substantial pollutant concentrations. The Certified EIR concluded that construction equipment exhaust combined with fugitive particulate matter emissions has the potential to expose sensitive receptors to substantial concentrations of criteria air pollutant emissions or DPM, and impacts would be significant and unavoidable.

Operational

Local Air Quality

The Certified EIR stated that SCAQMD recommends the evaluation of localized air quality impacts on sensitive receptors in the immediate vicinity of a project. However, the impacts are based on specific equipment and operations. Because the exact nature, location, and operation of the future developments are unknown, quantification of potential localized operational impacts and health risks would not be feasible and would be speculative. Land uses that have the potential to generate substantial stationary sources of emissions that would require a permit from SCAQMD include industrial land uses, such as chemical processing facilities and gasoline-dispensing facilities. Warehouses and distribution centers may generate substantial DPM emissions from off-road equipment use and truck idling. Under the General Plan Update, industrial-type land uses such as the aforementioned land uses may be permitted within the Planning Area. As operation of some these future developments may occur within proximity to sensitive receptors, there is the potential for localized emissions to exceed the significance thresholds and result in a result in a potentially significant impact.

General Plan policies identified on pages 3.2-37 through 3.2-42 of the Certified EIR will potentially reduce emissions and could potentially address impacts. Also, Mitigation

Measures MM AQ-6 and MM AQ-7 were identified in the Certified EIR to reduce construction pollutant emissions. In addition, future development under the General Plan Update will be required to conduct their own CEQA analysis and would determine significance based on the individual project specifics. The Certified EIR concluded that through each project's individual environmental review process, potential impacts will be identified and compared against relevant thresholds. Individual projects that exceed the thresholds would normally result in a potentially significant impact and require mitigation. The Certified EIR concluded that impacts related to this issue would be significant and unavoidable.

Intersection Hotspot Analysis

The Certified EIR stated that the potential for the General Plan Update to cause or contribute to CO hotspots was evaluated by comparing project intersections (both intersection geometry and traffic volumes) with prior studies conducted by SCAQMD in support of their AQMPs and considering existing background CO concentrations. This comparison demonstrates that the General Plan Update will not cause or contribute considerably to the formation of CO hotspots, that CO concentrations at project intersections will remain well below the ambient air quality standards and that no further CO analysis is warranted or required.

CO levels in the Planning Area are substantially below the federal and state standards. Maximum CO levels in recent years are 3.0 to 6.1 parts per million (ppm) (1-hour average) and 2.1 to 4.6 ppm (8-hour average). CO levels decreased dramatically in the Air Basin with the introduction of the catalytic converter in 1975. No exceedances of CO have been recorded at monitoring stations in the Air Basin since 2003, and the Air Basin is currently designated as a CO attainment area for both the CAAQS and NAAQS. Thus, it is not expected that CO levels at General Plan Update-impacted intersections will rise to the level of an exceedance of these standards.

Additionally, SCAQMD conducted CO modeling for the AQMP for the four worst-case intersections in the Air Basin: (1) Wilshire Boulevard and Veteran Avenue; (2) Sunset Boulevard and Highland Avenue; (3) La Cienega Boulevard and Century Boulevard; and (4) Long Beach Boulevard and Imperial Highway. In the AQMP, SCAQMD notes that the intersection of Wilshire Boulevard and Veteran Avenue is the most congested intersection in Los Angeles County, with an average daily traffic volume of approximately 100,000 vehicles per day. This intersection is located near the on- and off-ramps to Interstate 405 in West Los Angeles. The evidence provided in the AQMP shows that the peak modeled CO concentration due to vehicle emissions at these four intersections was 4.6 ppm (1-hour average) and 3.2 ppm (8-hour average) at Wilshire Boulevard and Veteran Avenue. When added to the existing background CO concentrations, the screening values would be up to 10.7 ppm (1-hour average) and 7.8 ppm (8- hour average). Based on the intersection volumes identified at these modeled intersections, if a project's traffic levels exceed 100,000 vehicles per day at any project impacted intersection, there would be the

potential for a significant impact and dispersion modeling would need to be conducted to determine the project-level impact.

Based on roadway segment volumes under the buildout horizon, the roadway segment with the maximum potential peak traffic for eastbound and westbound traffic is that of Del Amo Boulevard between Central Avenue and Alameda Street for eastbound and westbound traffic. For northbound and southbound traffic, the roadway segment with the maximum potential peak traffic would be that of Wilmington Avenue between 230th Street and Sepulveda Boulevard. These segments represent the largest east/westbound and north/southbound traffic in the City of Carson. While these roadway segments do not in fact intersect, even assuming that these traffic volumes would occur at an intersection, they combined would have a peak roadway intersection volume of approximately 61,860 vehicles per day, which is below the 100,000 vehicles per day modeled in SCAQMD's AQMP CO attainment demonstration. Furthermore, CO emissions from vehicles have substantially reduced compared to 2003 era vehicles based on improved vehicle emissions standards. As a result, CO concentrations are expected to be less than those estimated in the AQMP, which will not exceed the applicable thresholds. Thus, this comparison demonstrates that the General Plan Update will not contribute considerably to the formation of CO hotspots and no further CO analysis is required. The Certified EIR concluded that the General Plan Update would result in a less-than-significant impact with respect to CO hotspots.

Toxic Air Contaminants

The Certified EIR stated that construction and operation of the General Plan Update will result in emissions of toxic air contaminants (TAC), predominantly from diesel particulate emissions from on- and off-road vehicles during construction and from the operation of diesel-fueled equipment or generators during operational activities. Because the exact nature, location, and operation of the future developments are unknown, and because health risk impacts from TACs are cumulative over the life of the nearby receptors, quantification of potential health risks would be speculative. However, as construction and operation of these future developments may occur within close proximity to sensitive receptors, there is the potential for risk to exceed regulatory levels. Therefore, the Certified EIR concluded that health risk with respect to the development anticipated by the General Plan Update would be potentially significant.

Health Impacts

The Certified EIR stated that because regional emissions exceed the SCAQMD regulatory thresholds during construction and operational activities, there is the potential that these emissions would exceed the CAAQS and NAAQS thus resulting in a health impact. Without knowing the exact specifications for all projects that may be developed under the General Plan Update, there is no way to accurately calculate the potential for health impacts from the overall General Plan Update. Individual projects will be required to provide their own environmental assessments to determine health impacts from the

construction and operation of their projects. Because there is no way to determine the potential for these projects to affect health of sensitive receptors within the City of Carson, the Certified EIR concluded that the General Plan Update would result in a potentially significant health impact.

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

Construction

The Certified EIR concluded that potential sources that may emit odors during construction activities include the use of architectural coatings and solvents. SCAQMD Rule 1113 (Architectural Coatings) limits the amount of VOCs from architectural coatings and solvents. According to the SCAQMD CEQA Air Quality Handbook, construction equipment is not a typical source of odors. Odors from the combustion of diesel fuel would be minimized by complying with the CARB ATCM that limits diesel-fueled commercial vehicle idling to five minutes at any given location, which was adopted in 2004. The General Plan Update would also comply with SCAQMD Rule 402 (Nuisance), which prohibits the emissions of nuisance air contaminants or odorous compounds. Through adherence with mandatory compliance with SCAQMD Rules and state measures, construction activities and materials would not create objectionable odors. Construction of the General Plan Update's uses will not generate nuisance odors at nearby air quality sensitive receptors.

However, even with mandatory compliance with CARB and SCAQMD rules regulations and with implementation of Mitigation Measures MM AQ-1 through AQ-7, it is possible that some future development projects could be large in scale and/or intensity such that many pieces of heavy-duty construction equipment and/or heavy-duty trucks may be required and that construction period emissions could exceed the SCAQMD significance thresholds for attainment, maintenance or unclassified pollutants. Therefore, the Certified EIR concluded that impacts associated with project-related construction activities would be significant and unavoidable.

Operational

The Certified EIR stated that the General Plan Update's land uses are related to growth in residential, office, retail/restaurant, commercial, and park land uses and will not introduce substantial sources of other emissions, including odors. 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 General Plan Update could result in future development of commercial or industrial land uses that could generate odors. Additionally, even with mandatory compliance with CARB and SCAQMD rules regulations, it is possible that some future development projects could be large in scale and/or intensity such that many heavy-duty trucks may be required and that operational period emissions could exceed the SCAQMD significance thresholds

for attainment, maintenance or unclassified pollutants. Therefore, the Certified EIR concluded that project-related operational activities could result in a significant air quality impact with respect to other emissions.

3.3.2 Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

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

The Modified Project includes development of an infill site with 62 residential dwelling units, allowed under the existing zoning and land use designation for the site, as amended by the General Plan Amendment and Specific Plan Amendment that are part of the Modified Project, as discussed previously in Section 2.3. The Certified EIR stated that projects considered consistent with the General Plan are consistent with the air quality-related regional plan. Indicators of consistency include:

- Control Strategies: Whether implementation of a project would increase the frequency or severity of existing air quality violations; would cause or contribute to new violations; or would delay the timely attainment of AAQS or interim emissions reductions within the AQMP.
- Growth Projections: Whether implementation of the project would exceed growth assumptions within the AQMP, which in part, bases its strategy on growth forecasts from local general plans.

Additionally, the Certified EIR stated that all development under the General Plan Update is required to comply with CARB motor vehicle standards, SCAQMD regulations for stationary sources and architectural coatings, Title 24 energy efficiency standards, and to the extent applicable, to the growth projections. Further, the Certified EIR stated that individual projects under the General Plan Update will be required to undergo subsequent environmental review pursuant to CEQA and will be required to demonstrate compliance with the AQMP.

An assessment of the Modified Project's consistency with the current AQMP has been conducted, is included in Attachment A, and is summarized below.

The Project's air quality emissions would not exceed any state or federal standards. As a result, the Project would not increase the frequency or severity of an existing violation or cause or contribute to new violations for these pollutants. Additionally, as the Project would not exceed any state and federal standards, the Project would also not delay timely attainment of air quality standards or interim emission reductions specified in the AQMP.

With respect to the determination of consistency with AQMP growth assumptions, the projections in the AQMP for achieving air quality goals are based on assumptions in SCAG's 2020-2045 RTP/SCS regarding population, housing, and growth trends. Determining whether a project exceeds the assumptions reflected in the AQMP involves

the evaluation of three criteria: (1) consistency with applicable population, housing, and employment growth projections; (2) project mitigation measures; and (3) appropriate incorporation of AQMP land use planning strategies. The following discussion provides an analysis with respect to each of these three criteria.

- Is the project consistent with the population, housing, and employment growth projections upon which AQMP forecasted emission levels are based?

A project is consistent with the AQMP, in part, if it is consistent with the population, housing, and employment assumptions that were used in the development of the AQMP. In the case of the 2022 AQMP, two sources of data form the basis for the projections of air pollutant emissions: the City of Carson General Plan and SCAG's RTP. The General Plan serves as a comprehensive, long-term plan for future development of the City. The 2020-2045 RTP/SCS provides socioeconomic forecast projections of regional population growth. The population, housing, and employment forecasts, which are adopted by SCAG's Regional Council, are based on local plans and policies applicable to the specific area; these are used by SCAG in all phases of implementation and review. The 2020-2045 RTP/SCS accommodates a total of 105,200 persons; 30,700 households; and 70,000 jobs in the City of Carson by 2045.

The City provided local growth forecasts that were incorporated into the regional projections. The General Plan describes the "Corridor Mixed Use" designation as a mix of commercial and residential uses. As such, SCAG's assumptions about growth in the City accommodate the projected population and housing on the Project Site. As a result, the Project would be consistent with the growth assumptions in the City's General Plan. Because the AQMP accommodates growth forecasts from local General Plans, the emissions associated with this Project are accounted for and mitigated in the region's air quality attainment plans. The air quality impacts of development on the Project Site are accommodated in the region's emissions inventory for the 2020-2045 RTP/SCS and 2022 AQMP

Based on the average 2045 persons-per-household rate for the City of 3.43 persons per household, the Project would add a residential population of approximately 213 people to the Project Site based on the 62 dwelling units proposed. The Project's residential population would represent approximately 1.8 percent of the forecast population growth of 11,600 between 2016 and 2045 and would be consistent with the local growth assumptions that formed the basis of the region's AQMP.

- Does the project implement feasible air quality mitigation measures?

As discussed below, the Project would not result in any significant air quality impacts and would not require mitigation. In addition, the Project would comply with all applicable regulatory standards as required by SCAQMD. Furthermore, with compliance with the regulatory requirements identified above, no significant air quality impacts would occur. As such, the Project meets this AQMP consistency criterion.

- To what extent is project development consistent with the land use policies set forth in the AQMP?

With regard to land use developments, the AQMP's air quality policies focus on the reduction of vehicle trips and VMT. The Project would implement a number of land use policies of the City of Carson, SCAQMD, and SCAG, as the Project would be designed and constructed to support and promote environmental sustainability. The Project represents an infill development within an urbanized area that would concentrate more housing and population within a High Quality Transit Area (HQTA). "Green" principles are incorporated throughout the Project to comply with the City of Carson Green Building Code and CALGreen through energy conservation, water conservation, and waste reduction features.

The air quality plan applicable to the Project area is the 2022 AQMP, the current management plan for progression toward compliance with state and federal clean air requirements. The Project would be required to comply with all regulatory measures set forth by the SCAQMD. Implementation of the Project would not interfere with air pollution control measures listed in the 2022 AQMP. As noted earlier, the Project is consistent with the regional growth projections for the AQMP.

As demonstrated above, the Modified Project would be consistent with the AQMP. Thus, the Modified Project would not conflict with or obstruct implementation of the applicable air quality plan. Therefore, the Modified Project would not result in new or increased significant impacts beyond those identified in the Certified EIR.

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

The Modified Project includes development of an infill site with 62 residential dwelling units, allowed under the existing zoning and land use designation for the site, as amended by the General Plan Amendment and Specific Plan Amendment that are part of the Modified Project. The Certified EIR stated that each future project developed under the General Plan Update will be required to comply with SCAQMD rules and regulations as well as conduct their own applicable CEQA analysis for construction and operational activities and will determine significance based on the individual project specifics. Furthermore, future construction activities under the General Plan Update will be required to comply with the CARB ATCM, which limits diesel powered equipment and vehicle idling to no more than five minutes at a location, and the CARB In-Use Off-Road Diesel Vehicle regulation, CARB Truck and Bus regulation, and CARB ACT regulation, which all require construction equipment and vehicle fleet operators to repower or replace higher-emitting equipment with less polluting models, including zero- and near-zero-emissions on-road truck technologies as they become developed and commercially available. Additionally, construction of future development will be required to comply with SCAQMD rules and

regulations including Rule 403 for the control of fugitive dust and Rule 1113 for the control of VOC emissions from architectural coatings.

In conformance with the Certified EIR, an analysis of the Modified Project's construction and operational air quality impacts was conducted, is included in Attachment A, and is summarized below.

The Project's estimated daily regional and localized construction emissions are included in Table 4. As shown in the table, the Project's pollutant emissions would not exceed applicable significance thresholds, and Project impacts related to construction pollutant emissions would be less than significant.

Table 4
Daily Construction Emissions

Construction Phase Year	Daily Emissions (Pounds Per Day)					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
2025	2.2	17.3	23.7	<0.1	4.0	2.1
2026	6.5	16.5	23.3	<0.1	1.4	0.8
Maximum Regional Total	6.5	17.3	23.7	<0.1	4.0	2.1
Regional Threshold	75	100	550	150	150	55
Exceed Threshold?	**No**	**No**	**No**	**No**	**No**	**No**
Maximum Localized Total	15.9	14.1	14.5	<0.1	3.4	1.9
Localized Threshold	N/A	82	842	N/A	7	5
Exceed Threshold?	**N/A**	**No**	**No**	**N/A**	**No**	**No**

The construction dates are used for the modeling of air quality emissions in the CalEEMod software. If construction activities commence later than what is assumed in the environmental analysis, the actual emissions would be lower than analyzed because of the increasing penetration of newer equipment with lower certified emission levels. Assumes implementation of SCAQMD Rule 403 (Fugitive Dust Emissions).

Source: DKA Planning, 2024, based on CalEEMod 2022.1.1.29 model runs. LST analyses based on two-acre site with 25-meter distances to receptors in South Coastal LA source receptor area. Estimates reflect the peak summer or winter season, whichever is higher. Totals may not add up due to rounding. Refer to Attachment B.

The Project's estimated daily regional and localized operational emissions are included in Table 5. As shown in the table, the Project's pollutant emissions would not exceed applicable significance thresholds, and Project impacts related to operational pollutant emissions would be less than significant.

Table 5
Daily Operational Emissions

Emissions Source	Daily Emissions (Pounds Per Day)					
	VOC	**NO_X**	**CO**	**SO_X**	**PM_{10}**	**$PM_{2.5}$**
Area Sources	3.4	<0.1	3.5	<0.1	<0.1	<0.1
Energy Sources	<0.1	0.2	0.1	<0.1	0.1	0.1
Mobile Sources	1.4	1.0	11.8	<0.1	2.7	0.7
Vegetation	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1
Regional Total	4.8	1.2	15.4	<0.1	2.7	0.7
Regional Significance Threshold	55	55	550	150	150	55
Exceed Threshold?	**No**	**No**	**No**	**No**	**No**	**No**
Net Localized Total	3.4	0.2	3.6	<0.1	0.1	0.1
Localized Significance Threshold	N/A	82	842	N/A	2	1
Exceed Threshold?	**N/A**	**No**	**No**	**N/A**	**No**	**No**

LST analyses based on two-acre site with 25-meter distances to receptors in South Coastal LA SRA

Source: DKA Planning, 2024, based on CalEEMod 2022.1.1.29 model runs. Totals reflect the summer season maximum and may not add up due to rounding. Refer to Attachment B.

As demonstrated in the analysis, the Modified Project would not generate pollutant emissions in excess of SCAQMD's significance thresholds. Thus, the Modified Project would not 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. Therefore, the Modified Project would not result in new or increased significant impacts beyond those identified in the Certified EIR.

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

The Modified Project includes development of an infill site with 62 residential dwelling units, allowed under the existing zoning and land use designation for the site, as amended by the General Plan Amendment and Specific Plan Amendment that are part of the Modified Project. The Certified EIR stated that each future project developed under the Modified Project will be required to conduct their own CEQA analysis for construction and operational activities and will determine significance based on the individual project's specifics. Through each project's individual environmental review process, localized emissions may be quantified and compared against project-specific thresholds.

In conformance with the Certified EIR, an analysis of the Modified Project's construction and operational air quality impacts on nearby sensitive receptors was conducted and is included in Attachment A. As demonstrated in that analysis and above in Tables 4 and 5, the Modified Project would not generate pollutant emissions in excess of applicable

significance thresholds. Thus, the Modified Project would not expose sensitive receptors to substantial pollutant concentrations. Therefore, the Modified Project would not result in new or increased significant impacts beyond those identified in the Certified EIR.

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

The Modified Project includes development of residential land uses, which are not associated with odor emissions. Thus, the Modified Project would not result in other emissions (such as those leading to odors adversely affecting a substantial number of people. Therefore, the Modified Project would not result in new or increased significant impacts beyond those identified in the Certified EIR.

3.3.3 Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

No. As discussed above, the Modified Project would not result in any new or more severe significant impacts beyond what were identified in the Certified EIR.

3.3.4 Any New Information Requiring New Analysis or Verification?

No. There is no new information requiring new analysis or verification.

3.3.5 EIR's Mitigation Measures Addressing Impact

None required.

3.3.6 Conclusion

As discussed above, the Modified Project would not result in any of the conditions set forth in PRC Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Supplemental or Subsequent EIR.

3.4 BIOLOGICAL RESOURCES

Issues (and supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
BIOLOGICAL RESOURCES: Would the project:					
(a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	Less Than Significant	No	No	No	Yes
(b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	Less Than Significant	No	No	No	Yes
(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	No	No	No	No
(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	No	No	No	Yes
(e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	No Impact	No	No	No	No
(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	No	No	No	No

Impacts related to biological resources are discussed in the Certified EIR on pages 3.3-1 through 3.3-28.

3.4.1 Impact Determination in the EIR

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

Construction

Special-Status Plants

The Certified EIR concluded that special-status plant species (Southern Tarplant) has been recorded within the Planning Area, where future development allowed by the General Plan Update could directly or indirectly impact this biological resource. As anticipated by the buildout of the General Plan Update, construction of some projects could result in direct removal of Southern Tarplant. This species has a high potential to occur within the Planning Area (particularly along both banks of the Dominguez Channel on either side of I-110, north of Interstate 405), and future projects would have potential to impact Southern Tarplant on a project-by-project basis due to specific onsite conditions, which could result in a potentially significant impact.

However, construction of all future projects facilitated under the General Plan Update would be required to comply with the General Plan policies. Specifically, compliance with Guiding Policy OSEC-G-4 would require future projects under the General Plan Update to identify any special-status plants located within a future project's area of effect that are state or federally listed as Endangered, Threatened, or Rare, which would help to reduce significant impacts to special-status species within the Planning Area. While implementation of the General Plan policies would help to reduce impacts to special-status plants due to construction of future projects under the General Plan Update, all future projects would also be required to comply with all applicable laws, regulations, and ordinances related to special-status plants. All project sites that have been identified as supporting special-status plants would be required to comply with the California Endangered Species Act (CESA) and/or the Federal Endangered Species Act (FESA) through their regulatory permitting processes. The specific compensatory mitigation measures required to take a listed plant or to eliminate its habitat would be determined at the time of permitting prior to construction of the project. The compensatory mitigation measures would likely include habitat restoration and/or preservation, relocation of on-site special-status plants, and/or purchase of credits at a mitigation bank or in lieu fee program.

Although compliance with the General Plan policies and applicable laws and regulations would help to minimize impacts to special-status plants, project-specific mitigation measures (MM BIO-1 through MM BIO-3 identified on page 3.3-19 of the Certified EIR)

have also been incorporated to ensure that impacts to special-status plants would be reduced to a less than significant level on a project-by-project basis. These mitigation measures would require future projects developed under the General Plan Update to implement procedures and processes related to protecting special-status plants, such as preconstruction surveys, transplantation, agency coordination and implementation of an environmental awareness program related to special-status plants. Implementation of the mitigation measures would ensure that the impact to special-status plants with construction of future projects under the General Plan Update would be less than significant.

Special-Status Wildlife

The Certified EIR concluded that three special-status wildlife species (Tricolored Blackbird, Least Bell's Vireo and the Western Mastiff Bat) have potential to occur within the Planning Area, where future development allowed by the General Plan Update could directly or indirectly impact these biological resources. Adverse impacts on wildlife are generally associated with the degree of habitat loss including a habitat's physical character, quality, and diversity, in addition to abundance of vegetation. As anticipated by the buildout of the General Plan Update, construction of some projects could result in direct removal of wildlife habitat, resulting in the potential mortality of wildlife species existing on-site as well as the displacement of more mobile species to suitable habitat areas nearby. While these biological resources have a low potential to occur within the Planning Area due to the heavily developed nature of the Planning Area, future projects would have potential to impact these resources on a project-by-project basis due to specific onsite conditions, which could result in potentially significant impacts.

However, construction of all future projects facilitated under the General Plan Update would be required to comply with applicable General Plan. Specifically, compliance with Guiding Policy OSEC-G-4 would require future projects under the General Plan Update to monitor for wildlife migration routes and identify any special-status wildlife species located within a future project's area of effect that are state or federally listed as Endangered, Threatened, or Rare, which would help to reduce significant impacts to special-status species within the Planning Area.

While implementation of the General Plan policies would help to reduce impacts to biological resources due to construction of future projects under the General Plan Update, all future projects would also be required to comply with all applicable laws, regulations, and ordinances related to special-status wildlife. All project sites that have been identified as supporting special-status wildlife would be required to comply with CESA and/or FESA through their regulatory permitting processes. The specific compensatory mitigation measures required to take a listed wildlife species or to eliminate its habitat would be determined at the time of permitting prior to construction of the project. The compensatory mitigation measures would likely include habitat restoration and/or preservation, purchase of mitigation bank or in lieu fee program credits, and/or limitations regarding the extent and timing of construction.

Although compliance with the General Plan policies and applicable laws and regulations would help to minimize impacts to special-status wildlife, project-specific mitigation measures (MM BIO-4 through MM BIO-9 listed on pages 3.3-20 and 3.3-21 of the Certified EIR) have also been incorporated to ensure that impacts to special-status wildlife would be reduced to a less than significant level on a project-by-project basis. These mitigation measures would require future projects developed under the General Plan Update to implement procedures and processes related to protecting special-status wildlife, such as preconstruction surveys, compensatory mitigation ratios for loss of designated habitats, and protection and/or avoidance of special-status wildlife. Implementation of the mitigation measures would ensure that the impact to special-status wildlife with construction of future projects under the General Plan Update would be less than significant.

Nesting Birds

The Certified EIR concluded that nesting birds and/or nesting bird habitat have been recorded within the Planning Area, where future development allowed by the General Plan Update could directly or indirectly impact these biological resources. The Planning Area consists of trees, shrubs, and ground cover that could be used by breeding raptors and songbirds. Disturbing or destroying active nests is a violation of the Migratory Bird Treaty Act (MBTA) and nests and eggs are protected by Fish and Game Code, Section 3503. While these biological resources have a low potential to occur due to the heavily developed nature of the Planning Area, future projects would have potential to impact these resources on a project-by-project basis if removal of active nests or harassment of a breeding bird occur during construction, which could result in a potentially significant impact. Construction of all future projects facilitated under the General Plan Update would be required to comply with applicable General Plan policies. Specifically, compliance with Guiding Policies OSEC-G-3 and OSEC-G-5 and Implementing Policies OSECP-5 and OSEC-P-7 would aim to enhance and expand the City's urban forest canopy, which in turn would increase available nesting bird habitat throughout the Planning Area. In addition to applicable General Plan polices, future applicants would also be required to comply with the MBTA, which would further reduce impacts to nesting birds.

Although compliance with General Plan policies and the MBTA would help to minimize impacts to nesting birds and their associated habitat, project-specific mitigation measures (MM BIO-4 through MM BIO-6 listed on page 3.3-20 of the Certified EIR) have also been incorporated to ensure that impacts to nesting birds would be reduced to a less than significant level on a project-by-project basis. These mitigation measures would require future projects developed under the General Plan Update to implement procedures and processes related to protecting nesting birds and their associated habitat, such as preconstruction surveys and protection and/or avoidance of nesting birds and their associated habitats. Implementation of the mitigation measures would ensure that the impact to nesting birds with construction of future projects under the General Plan Update would be less than significant.

Operations

Special-Status Plants

The Certified EIR concluded that operation of future projects facilitated under the General Plan Update could include routine landscaping and maintenance, which could have the potential to adversely impact special-status plants. Potential adverse impacts may result from introducing non-native or invasive plant species into areas that support special-status plant species and could result in invasive species outcompeting these natives for water, nutrients, and sunlight. However, future projects would be required to comply with the General Plan policies, which support efforts to increase biodiversity of plant species by creating new natural habitats (Guiding Policy OSEC-G-3) or reclaiming natural habitats in heavily disturbed areas within the Planning Area (Implementing Policy OSEC-P-4). Furthermore, implementation of Mitigation Measure MM BIO-2 listed on page 3.3-19 of the Certified EIR would require future applicants to prepare a special-plants planting plan, if applicable, to ensure that adequate conditions, species, and monitoring are implemented within restored and/or preserved areas throughout operation of the project. Through compliance with General Plan policies and incorporation of this mitigation measure, the impact to special-status plants during operation would be reduced to a less than significant level.

Special-Status Wildlife

The Certified EIR concluded that operation of future projects developed under the General Plan Update could result in adverse impacts to special-status wildlife due to the removal and/or change in existing habitats, increased vehicular traffic and a corresponding increase in noise and threat of roadkill by traffic; an increase in human presence in preserved or open space areas; an increase in predatory and feral pets; an increase in litter, pollutants, dust, oil, and other human debris; and an increase in nighttime light trespass onto preserved open space. All of the applicable General Plan policies listed on pages 3.3-18 and 3.3-19 of the Certified EIR aim to help improve the conditions of the existing natural habitat and the associated species that utilize those habitats. However, to ensure that the operational impact to special-status wildlife associated with future projects is reduced to a less than significant level, future project applicants would be required to incorporate and implement mitigation measures MM BIO-4 through MM BIO-9 listed on pages 3.3-20 and 3.3-21 of the Certified EIR, as applicable.

Nesting Birds

The Certified EIR concluded that operation of future projects developed under the General Plan Update could result in adverse impacts to nesting birds due to the removal and/or change in existing habitats, increased vehicular traffic and a corresponding increase in noise and threat of road kill by traffic; an increase in human presence in preserved or open space areas; an increase in predatory and feral pets; an increase in litter, pollutants, dust, oil, and other human debris; and an increase in nighttime light trespass onto preserved open space. All of the applicable General Plan policies listed on

pages 3.3-18 and 3.3-19 of the Certified EIR aim to help improve the conditions of the existing natural habitat and the associated species that utilize those habitats. However, to ensure that the operational impact to nesting birds associated with future projects are reduced to a less than significant level, future project applicants would be required to incorporate and implement mitigation measures MM BIO-4 through MM BIO-6 listed on pages 3.3-20 and 3.3-21 of the Certified EIR, as applicable.

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

The Certified EIR concluded that riparian habitat has been documented in the Planning Area in the Dominguez Channel, Dominguez Branch Channel, Wilmington Drain, and in the Carson Harbor Village Mobile Home Park, which contains approximately 17 acres of wetlands protected by deed restrictions. These riparian areas within the Planning Area are not ideal locations to construct new development as they are either being used for regional infrastructure or are protected in perpetuity. USFWS designated critical habitat for listed plant or wildlife species does not occur within the Planning Area. In addition, sensitive natural communities have also been recorded within the Planning Area, which includes Southern Dune Scrub, Southern Foredunes, Southern Coastal Salt Marsh, and Southern Coastal Bluff Scrub. While these areas have not been identified as locations for new development, maintenance activities or improvements to these areas could result in impacts to these riparian habitats and/or sensitive natural communities.

A quantification of potential impacts on riparian or other sensitive natural communities cannot be made until the design and nature of specific projects is known. As a general rule, the removal and/or fragmentation of sensitive natural communities identified by the CDFW would be considered to be potentially significant due to their decline in the region and/or their suitability as habitat for sensitive species. In particular, the loss and/or fragmentation of riparian alliances and most native shrubland and scrub alliances could adversely affect rare, endangered, or threatened plant and wildlife species. Therefore, removal and/or fragmentation of these habitats would be considered a significant impact.

With buildout of the General Plan Update, development of some projects could result in direct removal or indirect impacts to the identified sensitive natural communities or riparian habitat depending on the location and scale of future projects. However, construction of all future projects facilitated under the General Plan Update would be required to comply with the General Plan policies listed on pages 3.3-18 and 3.3-19 of the Certified EIR. Specifically, compliance with Guiding Policy OSEC-G-4 would require future projects under the General Plan Update to recognize and support the preservation of wildlife migration routes and special-status species that are state or federally listed as Endangered, Threatened, or Rare, which would help to reduce significant impacts to sensitive natural communities or riparian habitats within the Planning Area. In addition, all future projects would also be required to comply with all applicable laws, regulations, and

ordinances related to sensitive natural communities and riparian habitat to ensure all obligatory protocols and/or measures are undertaken to protect these resources. Although compliance with the General Plan policies listed on pages 3.3-18 and 3.3-19 of the Certified EIR and the applicable laws and regulations would help to minimize impacts to sensitive natural communities, project-specific mitigation measures included in the Certified EIR (MM BIO-10 and MM BIO-11 listed on pages 3.3-23 and 3.3-24 of the Certified EIR) were also incorporated to ensure that impacts to sensitive natural communities and riparian habitat would be reduced to a less than significant level on a project-by-project basis. Implementation of Mitigation Measures MM BIO-10 and MM BIO-11 would ensure that the impact to sensitive natural communities and riparian habitat with development of future projects under the General Plan Update would be less than significant.

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

As discussed in the Certified EIR, within the Planning Area, wetlands have been identified within the Carson Harbor Village Mobile Home Park, which contains approximately 17 acres of wetlands protected by deed restrictions. Since these wetlands are protected by deed restrictions for perpetuity, no development or changes may occur within the wetlands boundaries. The only other wetland area documented within the Planning Area is the 17-acre Bixby Marshland, owned and operated by the Los Angeles County Sanitation Districts. Consequently, development under the General Plan Update would not have the potential to impact federally or state-protected wetlands through direct removal, filling, hydrologic interruption, or by other means. Therefore, no impact will occur related to adversely affecting federally or state-protected wetlands.

(d) Would the Project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

As discussed in the Certified EIR, limited wildlife movement is expected within the Planning Area due to the prevalence of developed areas and lack of native habitats. However, particularly within the riparian woodland communities, these communities may support movement on a smaller or “local” scale for species of invertebrates, amphibians, reptiles, birds, and small-to-medium mammals, primarily those with high urban tolerance. The home range of many of these species may be entirely contained within the isolated patches of riparian woodland habitat remaining within the City. However, on a larger regional scale, movement is not expected except for some limited movement along the improved, channelized waterways that may attract avian species and urban-adapted wildlife following these aquatic resources to areas where patches of habitat may be present.

A quantification of potential impacts on riparian or other sensitive natural communities cannot be made until the design and nature of specific projects is known. As a general rule, the removal and/or fragmentation of sensitive natural communities identified by the CDFW would be considered to potentially significant due to their decline in the region and/or their suitability as habitat for sensitive species. With buildout of the General Plan Update, operation of some projects could result in indirect impacts to the identified riparian habitat depending on maintenance and improvement activities. However, operation and maintenance of all future projects facilitated under the General Plan Update would be required to comply with the General Plan policies listed on pages 3.3-18 and 3.3-19 of the Certified EIR. Specifically, compliance with Guiding Policy OSEC-G-4 listed on page 3.3-18 of the Certified EIR requires future projects under the General Plan Update to monitor for wildlife migration routes and identify special-status species that are state or federally listed as Endangered, Threatened, or Rare, which would help to reduce significant impacts to riparian habitats within the Planning Area. In addition, all future projects would also be required to comply with all applicable laws, regulations, and ordinances related to sensitive natural communities and riparian habitat to ensure all obligatory protocols and/or measures are undertaken to protect these resources.

Although compliance with the General Plan policies and the applicable laws and regulations would help to minimize impacts to riparian habitat, implementation of the General Plan Update could result in the potential removal and/or fragmentation of existing riparian habitat within the Planning Area, thus resulting in a potentially significant impact.

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

Implementation of the General Plan Update will not introduce any potential conflicts with the existing City of Carson Tree Preservation and Protection Ordinance or the Los Angeles County Oak Tree Protection Ordinance, which applies to the City's SOI. Development of future projects facilitated under the General Plan Update would be subject to the City and County's tree preservation ordinances, as applicable, which includes adherence to tree management and trimming procedures. In addition, General Plan policies help promote a strong urban forest across public and private properties (Guiding Policy OSEC-G-5 and Implementing Policy OSEC-P-5 listed on page 3.3-18 of the Certified EIR) and enhance tree health and appearance of streets and other public spaces through the regular maintenance as well as tree and landscaping planting and care of the existing canopy (OSEC-P-6 listed on page 3.3-18 of the Certified EIR). Future project's consistency with these policies would further ensure impacts to tree resources would be minimized. Therefore, no impact associated with creating a conflict with a tree preservation policy or ordinance will occur.

(f) Would the Project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

Due to the lack of biological resources and heavily developed nature of the Planning Area, there are no Habitat Conservation Plans, Natural Community Conservation Plans, or other approved local, regional, or state habitat conservation plans adopted for the Planning Area. For this reason, development of future projects under the General Plan Update would not conflict or interfere with an adopted habitat conservation plan. While the presence of biological resources is relatively limited within the Planning Area, General Plan policies listed on pages 3.3-18 and 3.3-19 of the Certified EIR aim to protect and enhance the few biological resources within the Planning Area. Therefore, no impact related to creating a conflict with a habitat conservation plan will occur.

3.4.2 Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

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

A *Biological Resources Assessment* was prepared for the Project (refer to Attachment B).

According to the assessment, vegetation at the Project Site is either a disturbed and degraded non-native grassland or is an ornamental landscaped area. No native habitats occur on the Project Site, and no special-status species are expected to occur on the site due to the level of disturbance and lack of habitat. Thus, the Modified Project would not have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service. Therefore, the Modified Project would not result in new or increased significant impacts beyond those identified in the Certified EIR.

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

According to the *Biological Resources Assessment* prepared for the Project (refer to Attachment B), no riparian habitat or sensitive natural communities occur on the Project Site. Thus, the Modified Project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service. Therefore, the Modified Project would not result in new or increased significant impacts beyond those identified in the Certified EIR.

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

According to the *Biological Resources Assessment* prepared for the Project, based on literature reviews and field reconnaissance, there are no state or federally protected wetlands or jurisdictional features on the Project site. The Domingues Channel is a concrete drainage channel located 70-feet west of the site that would be avoided by the Project. Thus, the Modified Project would not 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. Therefore, the Modified Project would not result in new or increased significant impacts beyond those identified in the Certified EIR.

(d) Would the Project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

According to the *Biological Resources Assessment* prepared for the Project, based on the lack of native habitats, the urban nature of the Project Site and the site's isolation from other habitat, the Project Site is not part of any migratory wildlife corridors, habitat linkages, or wildlife nursery sites. No waterways occur on the Project Site. A gravelly and steep bank with a disturbed non-native grassland separates Domingues Channel from the site, and as a result, no fish occur at the site. The Project would not create any barriers to wildlife movement that could occur in Dominguez Channel. Thus, the Modified Project would not 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. Therefore, the Modified Project would not result in new or increased significant impacts beyond those identified in the Certified EIR.

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

No trees are located on the Project Site. There are street trees adjacent to the site that would not be affected by the Project. Thus, the Modified Project would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. Therefore, the Modified Project would not result in new or increased significant impacts beyond those identified in the Certified EIR.

(f) Would the Project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

The Project Site is not subject to any habitat conservation plan or natural community conservation plan. Thus, the Modified Project would not conflict with the provisions of an

adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. Therefore, the Modified Project would not result in new or increased significant impacts beyond those identified in the Certified EIR.

3.4.3 Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

No. As discussed above, the Modified Project would not result in any new or more severe significant impacts beyond what were identified in the Certified EIR.

3.4.4 Any New Information Requiring New Analysis or Verification?

No. There is no new information requiring new analysis or verification.

3.4.5 EIR's Mitigation Measures Addressing Impact

None required.

3.4.6 Conclusion

As discussed above, the Modified Project would not result in any of the conditions set forth in PRC Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Supplemental or Subsequent EIR.

3.5 CULTURAL RESOURCES

Issues (and supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
CULTURAL RESOURCES: Would the project:					
(a) Cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines §15064.5?	Significant and Unavoidable	No	No	No	Yes
(b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines §15064.5?	Less Than Significant With Mitigation	No	No	No	Yes
(c) Disturb any human remains, including those interred outside of formal cemeteries?	Less Than Significant	No	No	No	No

Impacts related to cultural resources are discussed in the Certified EIR on pages 3.4-1 through 3.4-24.

3.5.1 Impact Determination in the EIR

(a) Would the Project cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines §15064.5?

The Certified EIR stated that future development proposals initiated under the General Plan Update that include construction, demolition, or alteration of buildings/structures/objects/landscape features (hereafter referred to as "historic resources" or "properties") have the potential to cause a substantial adverse change to historical resources as defined by CEQA Guidelines Section 15064.5. Anticipated development under the General Plan Update and redevelopment or revitalization of underutilized properties could result in a substantial adverse change in the significance of a historical resource through physical demolition, destruction, relocation, or alteration of the resource. New construction through infill development on vacant property could result in a substantial adverse change in the significance of a historical resource through alteration of the resource's immediate surroundings. The CEQA Guidelines note that generally, a project that follows the Secretary of the Interior's Standards for the Treatment of Historic Properties is considered as mitigated to a level of less than significant impact on the historical resource. Projects that propose alteration of a historical resource and that do not adhere to these standards have the potential to result in a substantial adverse change in the significance of a historical resource. Other projects that propose demolition or alteration of, or construction adjacent to, existing historic resources over 45 years in age (the California Office of Historic Preservation's age threshold for consideration as

historical resources), could also result in a substantial adverse change in the significance of a historical resource. Changes in the setting of historic buildings and structures can result from the introduction of new visible features, significant landscape changes, or other alterations that change the historic integrity of the setting of a significant resource.

The results of the cultural resources records search conducted for the Certified EIR indicate that a total of 143 cultural resource studies have been conducted within the 0.5-mile radius of the Planning Area. Of the 143 studies, 83 have been conducted within the Planning Area limits. The results of the cultural resources records search also indicated that a total of 51 cultural resources have been recorded within the one-half mile radius of the City. Of the 51 cultural resources previously recorded, 22 are located within the Planning Area limits. These 22 resources consist of six prehistoric archaeological sites, one protohistoric archaeological site, seven historic archaeological sites, seven historic architectural resources, and one California Historical Landmark.

The Sacred Lands File (SLF) records search conducted for the Certified EIR revealed that no known Native American resources from the Native American Heritage Commission (NAHC) database have been recorded within the City; however, the NAHC noted “that the absence of specific site information in the Sacred Lands File does not indicate the absence of Native American cultural resources in any APE.” Any property that is or becomes of historic age may be a potential historical resource. A review of historic aerials indicates that there are numerous properties within the City that are more than 45 years in age. Any project that proposes the demolition, destruction, relocation, or alteration of property more than 45 years in age could result in a significant impact on historical resources.

The General Plan policies listed on pages 3.4-18 and 3.4-19 of the Certified EIR would help to identify, protect, preserve, and promote the preservation of historical resources. However, these policies do not require the identification and evaluation of historic-age properties to determine if there are historical resources within or nearby a proposed project site that could be adversely impacted by a proposed project, nor do they require the retention or rehabilitation of historical resources.

Mitigation Measure MM CUL-1 listed on page 3.4-19 of the Certified is required to ensure that historical resources are properly identified and that impacts on any identified historical resources are reduced. However, the Certified EIR concluded that impacts on historical resources that are demolished or altered in an adverse manner such that they are no longer able to convey their historical significance and such that they are no longer eligible for inclusion in the California Register typically cannot be mitigated to a level of less than significant. Therefore, impacts related to historical resources under the General Plan Update were found to be significant and unavoidable.

(b) Would the Project cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines §15064.5?

The Certified EIR stated that cultural resources records search indicated that a total of 143 cultural resource studies have been conducted within the one-half mile radius of the Planning Area. Of these 143 studies, 83 have been conducted within the City's limits. The results of the cultural resources records search also indicated that a total of 51 cultural resources have been recorded within the one-half mile radius of the City. Of the 51 cultural resources previously recorded, 22 are located within the City limits. These 22 resources consist of six prehistoric archaeological sites, one protohistoric archaeological site, seven historic archaeological sites, seven historic architectural resources, and one California Historical Landmark.

Future development proposals initiated under the General Plan Update that include construction-related ground disturbance (e.g., grubbing/clearing, grading, excavation, trenching, and boring) are activities that have potential to impact, or cause a substantial adverse change to, archaeological resources. Future development that does not require ground-disturbing activities will cause no impacts on archaeological resources.

Anticipated development in the City would occur through infill development on vacant property, and through redevelopment or revitalization of underutilized properties, which could result in damage to prehistoric and historic archaeological resources as a result of construction-related ground disturbance. In addition, infrastructure and other improvements requiring ground disturbance could result in damage to or destruction of archaeological resources buried below the ground surface.

The SLF records search through the NAHC yielded negative results; however, the NAHC noted "that the absence of specific site information in the Sacred Lands File does not indicate the absence of Native American cultural resources in any APE." Based on review of historic topographic maps, the City appears to have been a highly suitable area for the inhabitance of prehistoric people. For instance, the City once contained a marshy area known as the Dominguez Slough, which would have provided native inhabitants with food resources, such as plants and animals. The Dominguez Slough is known to have been channelized in the mid-1900s in order to provide flood protection in the South Bay area. The records search information has additionally confirmed that archaeological resources exist within the City. As a result of all these findings, the potential for encountering archaeological resources in the City is considered high. Significant archaeological sites are those that have the potential to contain intact deposits of artifacts, associated features, and dietary remains that could contribute to the regional prehistoric or historic record, or that may be of cultural or religious importance to Native American groups. Any project that proposes ground disturbance could result in a significant impact on archaeological resources.

In accordance with Mitigation Measure CUL-2 identified on page 3.4-21 of the Certified EIR, projects that identify significant archaeological resources (i.e., those resources that

qualify as historical or unique archaeological resources pursuant to CEQA Guidelines Section 15064.5 and Public Resources Code Section 21083.2, respectively) and preserve them through avoidance, permanent conservation easements, capping, or incorporation into open space, would reduce impacts on archaeological resources to a level that is less than significant. If preservation in place is not feasible, projects that conduct data recovery to recover the scientifically consequential information contained in the archaeological resource would also reduce impacts to less than significant. Furthermore, the General Plan Update includes policies listed on pages 3.4-18 and 3.4-19 of the Certified EIR that would help reduce the impact of future development on archaeological resources by requiring that development and redevelopment projects require an assessment (including a site survey and cultural resources records search) to assess the potential for finding archaeological resources. Additionally, if archaeological resources and/or Native American remains are found during ground disturbance for a project, all activity shall cease until the find has been evaluated a qualified professional archaeologist. Finally, mitigation is required to ensure that significant archaeological resources are properly identified and that the impact on any identified significant resources is reduced. The Certified EIR concluded that impacts related to archaeological resources under the General Plan Update would be less than significant.

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

The Certified EIR stated that impacts on human remains, including those interred outside of dedicated cemeteries, could occur as a result of future development proposals initiated under the General Plan Update that include ground disturbance (e.g., grubbing/clearing, grading, excavation, trenching, and boring). Future development that does not require ground-disturbing activities would cause no impact on human remains.

Although the SLF search through the NAHC yielded negative results, the South Central Coast Information Center (SCCIC) records search identified a Native American village (Suangna) and several prehistoric archaeological sites with burials in the City. As such, future development in the City has the potential to encounter human remains within the City during ground-disturbing activities. The treatment of human remains is regulated by California Health and Safety Code Section 7050.5 and the treatment of Native American human remains is further prescribed by Public Resources Code Section 5097.98. California Health and Safety Code Section 7050.5 requires that in the event human remains are discovered, the County Coroner be contacted to determine the nature of the remains. In the event the remains are determined to be Native American in origin, the Coroner is required to contact the NAHC within 24 hours to relinquish jurisdiction.

California Public Resources Code Section 5097.98 provides procedures in the event human remains of Native American origin are discovered during project implementation. Public Resources Code Section 5097.98 requires that no further disturbances occur in the immediate vicinity of the discovery, that the discovery is adequately protected according to generally accepted cultural and archaeological standards, and that further

activities take into account the possibility of multiple burials. Public Resources Code Section 5097.98 further requires the NAHC, upon notification by a County Coroner, designate and notify a Most Likely Descendant (MLD) regarding the discovery of Native American human remains. The MLD has 48 hours from the time of being granted access to the site by the landowner to inspect the discovery and provide recommendations to the landowner for the treatment of the human remains and any associated grave goods. In the event that no descendant is identified, or the descendant fails to make a recommendation for disposition, or if the landowner rejects the recommendation of the descendant, the landowner may, with appropriate dignity, reinter the remains and burial items on the property in a location that will not be subject to further disturbance.

These regulations are applicable to all projects within the City. In addition, the General Plan Update includes Implementing Policy OSEC-P-8 that would require future development projects to comply with state and federal law upon discovery of Native American remains. The Certified EIR concluded that adherence to existing regulations and the General Plan policy would ensure that the General Plan Update's impact associated with the disturbance of human remains would be less than significant.

3.5.2 Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

(a) Would the Project cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines §15064.5?

The Project Site does not contain any structures. Thus, the Modified Project would not cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines §15064.5. Therefore, the Modified Project would not result in new or increased significant impacts beyond those identified in the Certified EIR.

(b) Would the Project cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines §15064.5?

The Project Site is currently undeveloped. The Modified Project includes development of an infill site with 62 residential dwelling units, allowed under the existing zoning and land use designation for the site, as amended by the General Plan Amendment and Specific Plan Amendment that are part of the Modified Project. The Modified Project would include ground-disturbing activities, which could uncover unknown archaeological resources. However, the Applicant would be required to comply with Mitigation Measure CUL-2 identified on page 3.4-21 of the Certified EIR, which requires preparation of an archaeological report and compliance with any mitigation measures identified in the report. Thus, the Modified Project would not cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines §15064.5. Therefore, the Modified Project would not result in new or increased significant impacts beyond those identified in the Certified EIR.

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

The Project Site is located in an urban area and is currently undeveloped. The Modified Project includes development of an infill site with 62 residential dwelling units, allowed under the existing zoning and land use designation for the site and in accordance with the State Density Bonus law. The Modified Project would include ground-disturbing activities, which could uncover unknown human remains. If human remains are discovered, the Applicant would be required to comply with applicable regulations in the Public Resources Code described previously. Thus, the Modified Project would not disturb any human remains, including those interred outside of formal cemeteries. Therefore, the Modified Project would not result in new or increased significant impacts beyond those identified in the Certified EIR.

3.5.3 Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

No. As discussed above, the Modified Project would not result in any new or more severe significant impacts beyond what were identified in the Certified EIR.

3.5.4 Any New Information Requiring New Analysis or Verification?

No. There is no new information requiring new analysis or verification.

3.5.5 EIR's Mitigation Measures Addressing Impact

The Modified Project would implement Mitigation Measure CUL-2 from the Certified EIR.

3.5.6 Conclusion

As discussed above, the Modified Project would not result in any of the conditions set forth in PRC Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Supplemental or Subsequent EIR.

3.6 ENERGY

Issues (and supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
ENERGY: Would the project:					
(a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	Less Than Significant	No	No	No	No
(b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	Less Than Significant	No	No	No	No

Impacts related to energy are discussed in the Certified EIR on pages 3.5-1 through 3.5-32.

3.6.1 Impact Determination in the EIR

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

Construction

Electricity

The Certified EIR stated that construction electricity would be consumed, on a limited basis, to power lighting, electric equipment, and supply and convey water for dust control. During construction of new development, the electricity demand at any given time would vary throughout the construction period based on the construction activities being performed and would cease upon completion of construction. Electricity use from construction would be short-term, limited to working hours, used for necessary construction-related activities. When not in use, electric equipment would be powered off so as to avoid unnecessary energy consumption. Furthermore, the electricity used for off-road light construction equipment would have the co-benefit of reducing construction-related energy use from more traditional construction-related energy such as diesel fuel. Therefore, the Certified EIR concluded that the impact from construction electrical demand would be less than significant and would not result in the wasteful, inefficient, and unnecessary consumption of energy.

Natural Gas

The Certified EIR stated that construction activities, including the construction of new buildings and facilities, typically do not involve the consumption of natural gas. Accordingly, natural gas would generally not be supplied to support construction activities; thus, there would be no expected demand generated by future construction under the General Plan Update. If natural gas is used during construction, it would be in limited amounts and on a temporary basis and would specifically be used to replace or offset diesel-fueled equipment and as such would not result in substantial on-going demand. Therefore, the Certified EIR concluded that the impact from construction natural gas demand would be less than significant and would not result in the wasteful, inefficient, and unnecessary consumption of energy.

Transportation Energy

The Certified EIR stated that transportation fuels (gasoline and diesel) are produced from crude oil, which can be domestic or imported from various regions around the world. Based on current proven reserves, crude oil production would be sufficient to meet over 50 years of worldwide consumption. Construction of new development that could occur from adoption of the General Plan Update would utilize fuel-efficient equipment consistent with state and federal regulations, such as the fuel efficiency regulations in accordance with the SAFE Vehicle Rule and Advanced Clean Truck Program, which would result in more efficient use of transportation fuels (lower consumption). Construction equipment and vehicles would also be required to comply with anti-idling regulations in accordance with Section 2485 in Title 13 of the California Code of Regulations (CCR), and fuel requirements in accordance with Section 93115 in Title 17 of the CCR. As such, construction of new development would comply with regulatory measures to reduce the inefficient, wasteful, and unnecessary consumption of energy, such as petroleum-based transportation fuels. While some of these regulations are intended to reduce construction emissions, compliance with the anti-idling and emissions regulations discussed above would also result in fuel savings from the use of more fuel-efficient engines.

Based on the above, construction would utilize energy only for necessary on-site activities and to transport construction materials and demolition debris to, from, and within the City. Idling restrictions and the use of cleaner, energy-efficient equipment and fuels would result in less fuel combustion and energy consumption, and thus, minimize construction-related energy use. Therefore, the Certified EIR concluded that construction of new development that could occur with the adoption of the General Plan Update would not result in the wasteful, inefficient, and unnecessary consumption of energy, and this impact would be less than significant.

Operation

Electricity

The Certified EIR stated that operation of new development that could occur from adoption of the General Plan Update would result in demand for electricity resources including for water supply, conveyance, distribution, and treatment. Operation of existing development and new development under the General Plan Update would result in a net increase of electricity compared to existing conditions of approximately 2,520 megawatt hours (MWh) per year. New development under the General Plan Update would comply with the applicable provisions of Title 24 and the CALGreen Code in effect at the time of building permit issuance. Since the standards are updated every three years, future new development under the General Plan Update would be designed to include energy saving features to comply with future Title 24 standards and CALGreen Code requirements, which may include greater use of energy and water efficient fixtures and fittings, energy efficient mechanical systems, light pollution reduction, site development best practices, sub metering, water efficient landscapes, recycling, and superior weather resistance and moisture management. Further, implementation of policies on pages 3.5-23 through 3.5-28 of the Certified EIR would reduce the electricity demand from new development in the City by promoting energy efficiency designs and strategies beyond regulatory requirements and policies for renewable energy. Therefore, operations would not result in the wasteful, inefficient, and unnecessary consumption of electricity.

For the 2020 fiscal year, Southern California Edison (SCE) had an annual electric sale to customers of approximately 85,399,000 MWh. The net increase in future electricity demand from existing development and new development that could occur from adoption of the General Plan Update would represent approximately 0.003 percent of the SCE network sales for 2020. Under peak conditions, the net increase of 2,520 MWh on an annual basis would generally be equivalent to a peak of 0.3 to 0.6 MW (assuming 8,760 hours or 4,380 hours per year of active electricity demand). In comparison to the SCE power grid base peak load of 23,881 MW for 2020, the net increase would represent approximately 0.001 to 0.002 percent of the SCE base peak load conditions. Thus, the Certified EIR concluded that it is likely that the net increase in electricity would generally be served by existing infrastructure capacity and the impact related to electrical supply and infrastructure capacity would be less than significant.

Natural Gas

The Certified EIR stated that new development that could occur from adoption of the General Plan Update would result in demand for natural gas resources. As would be the case with electricity, the new development would comply with the applicable provisions of Title 24 and the CALGreen Code in effect at the time of building permit issuance to minimize natural gas demand. Since the energy efficiency standards are updated every three years, future new development with adoption of the General Plan Update would be designed to include energy saving features to comply with future Title 24 standards and

CALGreen Code requirements, which could include improvements to water heating efficiency or reduced natural gas-fueled systems in buildings. Further, implementation of policies on pages 3.5-23 through 3.5-28 of the Certified EIR would reduce the demand for natural gas from new development in the City by promoting energy efficiency designs and strategies beyond regulatory requirements and policies for renewable energy. Therefore, the Certified EIR concluded that operations would not result in the wasteful, inefficient, and unnecessary combustion of natural gas.

According to SoCalGas data, natural gas demand has been relatively stable over the past three years ranging from 2,342 million cubic feet (MMcf) per day or 854,830 MMcf total in 2018 to 2,435 MMcf per day or 888,775 MMcf total in 2020. The net increase in future natural gas demand from existing development and new development that could occur from adoption of the General Plan Update would account for approximately 0.0003 percent of SoCalGas' 2020 sales. According to the 2020 California Gas Report, SoCalGas is forecasted to require 767,595 MMcf in the year 2035, the latest available projected year. The estimated increase in natural gas demand of 2,689,888 cf per year would account for approximately 0.0004 percent of SoCalGas' projected natural gas demand for the year 2035. Therefore, it is anticipated that SoCalGas' existing and planned natural gas supplies would be sufficient to support the demand for natural gas at full City buildout conditions. Therefore, the Certified EIR concluded that it is likely that the net increase in natural gas would generally be served by existing infrastructure capacity and the impact related to natural gas would be less than significant.

Transportation Energy

The Certified EIR stated that transportation fuels (gasoline and diesel) are produced from crude oil, which can be domestic or imported from various regions around the world, and based on current proven reserves, crude oil production would be sufficient to meet over 50 years of worldwide consumption.

Traffic reduction policies within the General Plan Circulation element may not be fully reflected in the VMT and transportation fuel consumption estimates. Therefore, estimated mobile source transportation fuel consumption are conservatively higher. The location, design, and land uses of the growth anticipated with adoption of the General Plan Update would implement land use and transportation strategies related to reducing vehicle trips for residents and employees of the City by increasing commercial and residential density with over 95 percent of new residential development planned for multi-family dwelling units, which would allow for increased mixed-use density at infill locations and near public transit. Several transit agencies provide local and regional transit service to the residents of Carson, including Metro, Long Beach Transit, Compton Renaissance Transit, Gardena Transit, and Torrance Transit.

The General Plan Update focuses on infill development and revitalization to help the City transition from a predominantly industrial and suburban community to a complete City with an integrated mix of housing, employment, educational, cultural, and recreational

options balanced with industrial uses. These efforts are targeted in the Core and in centers around the Core, expanding on recent development along Carson Street. Development in the centers, along key corridors, and large opportunity sites such as the Shell property on East Del Amo Boulevard and South Wilmington Avenue are envisioned to be connected by community-oriented Boulevards that feature public gathering spaces and pedestrian- and bicycle-oriented designs. New land use designations that introduce greater flexibility through emphasis on mixed uses instead of single uses are proposed to facilitate development to achieve this vision and respond to the need to accommodate the City's growing and diverse population. The focus on infill development and land use designations for mixed uses would support land use and transportation strategies by providing for greater density near transit. Higher densities, especially in mixed-use designations, increase capacity for residential development near community-serving commercial, retail, and office uses as well as schools, parks, and recreational facilities, and proposed improvements to the bicycle, pedestrian, and road networks will make it easier for residents to travel throughout the community. Therefore, adoption of the General Plan Update would support statewide and regional efforts to improve transportation energy efficiency and reduce transportation energy consumption.

As the General Plan Update would support statewide and regional efforts to improve transportation energy efficiency, and adoption of the General Plan Update would not conflict with the 2020–2045 RTP/SCS goals and benefits intended to improve mobility and access to diverse destinations, provide better "placemaking," provide more transportation choices, and reduce vehicular demand and associated emissions. Therefore, adoption of the General Plan Update would not conflict with the actions and strategies contained in the 2020 RTP/SCS. In fact, the general location of new development that would occur under the General Plan Update would not conflict with the recommendations in these documents and would support their goals. In addition, with the adoption of the General Plan Update, municipal solid waste would continue to be diverted to City-certified construction and demolition waste processors using City-certified waste haulers, which include El Sobrante Landfill and H.M Holloway Inc. Landfill. Diversion of solid waste would reduce truck trips to landfills, which are typically located some distance away from City centers and would increase the amount of waste recovered (e.g., recycled, reused, etc.) at material recovery facilities, thereby further reducing transportation fuel consumption. AB 341, adopted in 2012, requires that commercial enterprises that generate four cubic yards or more of solid waste and multi-family housing complexes of five units or more participate in recycling programs in order to meet California's goal to recycle 75 percent of its solid waste by 2020. SB 1383, adopted in 2016, establishes goals of 50 percent organics waste reduction by 2020 and 75 percent reduction by 2025. Development of future land uses, as projected in the General Plan Update, would be required to comply with federal, state, and local statutes and regulations related to solid waste. Furthermore, the policies listed on page 3.17-28 of the Certified EIR regarding solid waste disposal and associated public facilities would further ensure compliance with applicable regulations. Compliance with federal, state, and local waste

management and reduction statutes and regulations related to solid waste would reduce waste-related transportation energy.

The Certified EIR concluded that based on the above, future new development with the adoption of the General Plan Update would minimize operational transportation fuel demand in line with state, regional, and county goals. Therefore, the General Plan Update would not lead to wasteful, inefficient, and unnecessary consumption of energy, and this impact would be less than significant.

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

Construction

The Certified EIR stated that construction of new development that could occur from adoption of the General Plan Update would utilize construction contractors who must demonstrate compliance with applicable regulations. Construction equipment would be required to comply with federal, state, and regional requirements where applicable. With respect to truck fleet operators, the Environmental Protection Agency (EPA) and National Highway Traffic Safety Administration (NHSTA) have adopted fuel-efficiency standards for medium- and heavy-duty trucks that will be phased in over time. Phase 1 heavy-duty truck standards apply to combination tractors, heavy-duty pickup trucks and vans, and vocational vehicles for model years 2014 through 2018 and result in a reduction in fuel consumption from 6 to 23 percent over the 2010 baseline, depending on the vehicle type. The EPA and NHTSA also adopted the Phase 2 heavy-duty truck standards, which cover model years 2021 through 2027 and require the phase-in of a 5 to 25 percent reduction in fuel consumption over the 2017 baseline depending on the compliance year and vehicle type. These regulations would have an overall beneficial effect on reducing fuel consumption from trucks over time as older trucks are replaced with newer models that meet the standards.

In addition, construction equipment and trucks are required to comply with CARB regulations regarding heavy-duty truck idling limits of five minutes per occurrence and location. Additionally, CARB regulations regarding in-use off-road equipment require older, less efficient equipment to be replaced or repowered with newer, more efficient models or engines. These regulations would result in an increase in energy savings in the form of reduced fuel consumption from more fuel-efficient engines. Although these requirements are intended to reduce criteria pollutant emissions, compliance with the anti-idling and emissions regulations would also result in the efficient use of construction-related energy. Thus, the Certified EIR concluded that based on the information above, construction of new development under the General Plan Update would comply with existing energy standards, and the impact would be less than significant.

Operations

The Certified EIR stated that operation of new development that could occur from adoption of the General Plan Update would be designed in a manner that is consistent with relevant energy conservation plans designed to encourage development that results in the efficient use of energy resources. New development would comply with Title 24 requirements and CALGreen to reduce energy consumption by implementing energy efficient building designs, pre-wiring residences with electric vehicle charging ports, implementing solar-ready rooftops, reducing indoor and outdoor water demand, and installing energy-efficient appliances and equipment. The City of Carson Energy Efficiency Climate Action Plan (EECAP) identifies community-wide strategies to lower energy use. Energy reductions within the EECAP are from transportation, land use, energy generation and consumption, water consumption and waste generation. The General Plan Update incorporates the EECAP goals and policies listed on pages 3.5-23 through 3.5-28 of the Certified EIR for energy efficiency and renewable energy, including electric vehicle charging, which would source transportation energy from renewable sources in accordance with the Renewables Portfolio Standard. Thus, new development under the General Plan Update would incorporate Climate Action Plan goals and policies as part of future development approvals and would not result in conflicts with the plan.

Through the City's EECAP, the City has established goals and strategies that would reduce energy use. The EECAP focuses on increasing energy efficiency and reducing greenhouse gas (GHG) emissions from energy to meet attainment goals. In addition to EECAP energy efficiency goals, utility providers (such as SCE) are required to provide 50 percent of their electricity supply from renewable sources by the year 2030, further reducing the GHG intensity of supplied electricity. New development under the General Plan Update would comply with CALGreen energy efficiency requirements, which would be consistent with EECAP goals for increasing energy and water use efficiency in new residential and commercial developments. With respect to operational transportation-related fuel usage, future development under the General Plan Update would support statewide efforts to improve transportation energy efficiency and reduce transportation energy consumption with respect to private automobiles. Vehicles associated with new development would be required to comply with CAFE fuel economy standards, which are designed to result in more efficient use of transportation fuels. Furthermore, adoption of the General Plan Update would not conflict with the 2020– 2045 RTP/SCS goals and benefits intended to improve mobility and access to diverse destinations, provide better "placemaking," provide more transportation choices, and reduce vehicular demand and associated emissions. The 2020–2045 RTP/SCS includes land use and transportation strategies that are intended to reduce VMT and resulting fuel consumption. The applicable land use strategies include planning for growth around livable corridors; providing more options for short trips/neighborhood mobility areas; supporting zero emission vehicles and expanding vehicle charging stations; and supporting local sustainability planning. The applicable transportation strategies include managing through a Transportation Demand Management (TDM) Program and Transportation System Management (TSM) Plan,

including advanced ramp metering, and expansion and integration of the traffic synchronization network; and promoting active transportation. The majority of the transportation strategies are to be implemented by cities, counties, and other regional agencies such as SCAG and SCAQMD, although some can be furthered by individual development projects.

Policies in the Circulation Element include policies in-line with the 2020–2045 RTP/SCS such as encouraging local government and employers to implement TDM policies that promote VMT reductions, promoting bike-sharing, car-sharing and other electrified modes as options to reduce traffic congestion, and focusing truck traffic onto appropriate arterial corridors in the City. Further, the location, design, and land uses from growth anticipated by the General Plan Update would implement land use and transportation strategies related to reducing vehicle trips for residents and employees of the City by increasing commercial and residential density with over 95 percent of new residential development planned for multi-family dwelling units, which would allow for increased mixed-use density at infill locations and near public transit. Several transit agencies provide local and regional transit service to the residents of Carson, including Metro, Long Beach Transit, Compton Renaissance Transit, Gardena Transit, and Torrance Transit. Several routes in Carson provide access to the Metro A (Blue) Line, which passes through the eastern edge of the City without stops. The Harbor Gateway Transit Center is located just west of the City, adjacent to I-110. This transit center is a stop on the Metro Silver Line, which provides critical regional access to downtown Los Angeles and east to the El Monte Station. Connection to the Transit Center is provided by Metro Lines 52 and 246. Both Long Beach Transit and Torrance Transit provide access to Long Beach, including the Long Beach Transit Gallery, located at the downtown Long Beach A Line station. Torrance Transit also provides access to the South Bay, including to the South Bay Galleria Transit Center and the Redondo Beach Pier.

The General Plan Update focuses on infill development and revitalization to help the City transition from a predominantly industrial and suburban community to a complete City with an integrated mix of housing, employment, educational, cultural, and recreational options balanced with industrial uses. These efforts are targeted in the Core and in centers around the Core, expanding on recent development along Carson Street. Development in the centers, along key corridors, and large opportunity sites such as the Shell property on East Del Amo Boulevard and South Wilmington Avenue are envisioned to be connected by community-oriented Boulevards that feature public gathering spaces and pedestrian- and bicycle-oriented designs. New land use designations that introduce greater flexibility through emphasis on mixed uses instead of single uses are to facilitate development to achieve this vision and respond to the need to accommodate the City's growing and diverse population.

The General Plan Update outlines strategies for greater integration of uses in different parts of the City and a better connection between employment and residential uses, with more areas designated for mixed-use development. It recognizes the physical elements

that help define the character of Carson, including existing residential neighborhoods, downtown Core, industrial/business centers, and corridors. This structure helps establish a clear multi-modal network throughout the City by focusing on both community destinations as well as the efficiency, safety, and convenience of the modes of transportation in between. Higher densities, especially in mixed-use designations, increase capacity for residential development near community-serving commercial, retail, and office uses as well as schools, parks, and recreational facilities, and improvements to the bicycle, pedestrian, and road networks will make it easier for residents to travel throughout the community. Therefore, the General Plan Update would not conflict with RTP/SCS land use and transportation strategies that are intended to reduce VMT and resulting fuel consumption.

Based on the information above, the Certified EIR concluded that operation of new development under the General Plan Update would comply with plans for energy

3.6.2 Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

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

The Project Site is located in an urban area and is currently undeveloped. The Modified Project includes development of the site with 62 residential dwelling units, allowed under the existing zoning and land use designation for the site and in accordance with the State Density Bonus law.

As concluded in the Certified EIR, the Modified Project's use of electricity and transportation fuel during construction would be temporary and comply with regulatory measures to reduce the inefficient, wasteful, and unnecessary consumption of energy, such as petroleum-based transportation fuels. Additionally, during the operational phase of the Modified Project, electricity and natural gas would be provided to the Modified Project via existing sources and infrastructure, and all energy consumption (including transportation fuel) would occur in accordance with evolving energy and fuel efficiency standards. Thus, the Modified Project would not result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation. Therefore, the Modified Project would not result in new or increased significant impacts beyond those identified in the Certified EIR.

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

The Project Site is located in an urban area and is currently undeveloped. The Modified Project includes development of the site with 62 residential dwelling units, allowed under the existing zoning and land use designation for the site and in accordance with the State

Density Bonus law. The Modified Project would comply with all plans for energy efficiency and renewable energy. Thus, the Modified Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. Therefore, the Modified Project would not result in new or increased significant impacts beyond those identified in the Certified EIR.

3.6.3 Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

No. As discussed above, the Modified Project would not result in any new or more severe significant impacts beyond what were identified in the Certified EIR.

3.6.4 Any New Information Requiring New Analysis or Verification?

No. There is no new information requiring new analysis or verification.

3.6.5 EIR's Mitigation Measures Addressing Impact

None required.

3.6.6 Conclusion

As discussed above, the Modified Project would not result in any of the conditions set forth in PRC Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Supplemental or Subsequent EIR.

3.7 GEOLOGY AND SOILS

Issues (and supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
GEOLOGY AND SOILS: Would the project:					
(a) Directly or indirectly cause potential substantial adverse effects, including the risk or loss, injury or death involving:					
(i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?	Less Than Significant	No	No	No	No
(ii)Strong seismic ground shaking?	Less Than Significant	No	No	No	No
(iii) Seismic-related ground failure, including liquefaction?	Less Than Significant	No	No	No	No
(iv) Landslides?	Less Than Significant	No	No	No	No
(b) Result in substantial soil erosion or the loss of topsoil?	Less Than Significant	No	No	No	No
(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	No	No	No	No
(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	No	No	No	No
(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 wastewater?	No Impact	No	No	No	No
(f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	Less Than Significant	No	No	No	No

Impacts related to geology and soils are discussed in the Certified EIR on pages 3.6-1 through 3.6-28.

3.7.1 Impact Determination in the EIR

(a.i) Would the Project directly or indirectly cause potential substantial adverse effects, including the risk or loss, injury or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?

The Certified EIR stated that the Avalon-Compton Fault and the corresponding Alquist-Priolo Fault Zone run through the northeastern part of the City. However, the potential for seismic hazards due to fault rupture in Carson is relatively low because of the limited presence of known faults in the Planning Area. Although there is a potential for greater damage from potential earthquakes in the greater Southern California region and exposure to seismic risks cannot be completely eliminated, the General Plan Update's policies adhere to state and local regulations, such as CBC requirements, to address these seismic hazards. Therefore, the Certified EIR concluded that the impact related to fault rupture would be less than significant.

(a.ii) Would the Project directly or indirectly cause potential substantial adverse effects, including the risk or loss, injury or death involving strong seismic ground shaking?

The Certified EIR stated that earthquakes in and near the Planning Area have the potential to cause ground shaking of significant magnitude. If an earthquake were to occur, residents of the City could expect to feel potential ground shaking at a Modified Mercalli intensity of VII, very strong shaking with moderate damage, with a chance of damage at two to five percent. The General Plan Update would allow for additional development within the Planning Area, which could expose people and property to strong seismic ground shaking. However, all new buildings would be constructed in compliance with the CBC to resist the effects of earthquake motions. Additionally, General Plan policies listed on pages 3.6-21 through 3.6-22 of the Certified EIR would address any potential impacts associated with strong seismic ground shaking. Therefore, the Certified EIR concluded that the impact related to strong seismic ground shaking would be less than significant.

(a.iii) Would the Project directly or indirectly cause potential substantial adverse effects, including the risk or loss, injury or death involving seismic-related ground failure, including liquefaction?

The Certified EIR stated that the City has several liquefaction hazard areas that are primarily located near water, primarily alluvial and former slough areas. A significant portion of the Planning Area has been designated as liquefaction hazard zones, and development in these areas requires a geotechnical investigation report as part of the environmental and building permit process. General Plan policies—such as Implementing Policy CSES-P-18 list on page 3.6-22 of the Certified EIR that requires that projects in areas of high liquefaction risk submit geotechnical investigation reports and demonstrate

that the project conforms to all recommended mitigation measures prior to City approval—would address liquefaction potentials by ensuring that sensitive or potentially hazardous facilities are prepared for a liquefaction event. Therefore, the Certified EIR concluded that the impact related to liquefaction would be less than significant.

(a.iv) Would the Project directly or indirectly cause potential substantial adverse effects, including the risk or loss, injury or death involving landslides?

The Certified EIR stated that rapid erosion and landslides are most likely to occur on sloped areas. According to the California Geological Survey, the Planning Area does not contain any landslide hazard areas. Due to the relative absence of significant elevation changes in the City, slope instability is limited to the slopes adjacent to the flood control channels that intersect the City. The potential impacts from landslides on development of future land uses associated with the General Plan Update would be addressed through site-specific geotechnical studies prepared in accordance with California Building Code (CBC) requirements and standard industry practices, as needed, which would specifically address landslide hazards. Development would conform to the current design provisions of the CBC to mitigate losses from landslides. Therefore, the Certified EIR concluded the impact related to seismically-induced landslides would be less than significant.

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

The Certified EIR stated that development anticipated by the General Plan Update would likely include earthwork activities that could expose soils to the effects of erosion or loss of topsoil. Once disturbed, either through removal of vegetation, asphalt, or an entire structure, stockpiled soils can be exposed to the effects of wind and water if not managed properly. The General Plan Update includes policies listed on pages 3.6-22 and 3.6-23 of the Certified EIR that require the use of best management practices (BMPs) to control soil erosion during and after ground-disturbing activities and geotechnical reports for projects requiring grading permits. In addition, development that disturbs more than one acre would be subject to compliance with a National Pollutant Discharge Elimination System (NPDES) permit. Compliance includes the implementation of BMPs, some of which are specifically implemented to reduce soil erosion or loss of topsoil, and the implementation of a storm water pollution prevention plan (SWPPP) through the local jurisdiction. BMPs that are required under a SWPPP include erosion prevention measures that have proven effective in limiting soil erosion and loss of topsoil. Generally, once construction is complete and exposed areas are revegetated or covered by buildings, asphalt, or concrete, the erosion hazard is substantially eliminated or reduced. Therefore, the Certified EIR concluded that the impact related to soil erosion and topsoil loss would be less than significant.

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

The Certified EIR concluded that some development allowed under the General Plan Update could be located on geologic units or soils that are unstable, or that could become unstable, and result in geologic hazards if not addressed appropriately. Areas with underlying materials that include undocumented fills, soft compressible deposits, or loose debris could be inadequate to support development, especially multi-story buildings. Soils that exhibit expansive properties when exposed to varying moisture content over time could result in damage to foundations, walls, or other improvements. Structures, including residential units and commercial buildings, could be damaged as a result of settlement or differential settlement where structures are underlain by materials of varying engineering characteristics.

Construction of new structures in the vicinity of relatively steep slopes could provide additional loading causing landslides or slope failure from unstable soils or geologic units. Slope failure can occur naturally through rainfall or seismic activity, or through earthwork and grading related activities. However, there is a relative absence of significant elevation changes within the City limits.

The potential hazards of unstable soil or geologic units would be addressed largely through the integration of geotechnical information in the planning and design process for projects to determine the local soil suitability for specific projects in accordance with standard industry practices and state-provided requirements, such as CBC requirements that are used to minimize the risk associated with these hazards. Geotechnical investigations would be required to thoroughly evaluate site-specific geotechnical characteristics of subsurface soils and bedrock to assess potential hazards and recommend site preparation and design measures to address any hazards which may be present. These measures are enforced through compliance with the CBC to address hazards relating to unstable soils and slope failure. Furthermore, policies included the General Plan Update on pages 3.6-22 and 3.6-23 of the Certified EIR would address risk of exposure to geological hazards, including lateral spreading and landslide, by mandating site-specific geotechnical investigation and mitigation prior to development, and continually upgrading the City's geotechnical standards. The Certified EIR concluded that for these reasons, the impact related to hazards associated with unstable soils, such as landslide, lateral spreading, subsidence, liquefaction, or collapse, would be less than significant.

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

The Certified EIR stated that soils that exhibit expansive properties when exposed to varying moisture content over time could result in damage to foundations, walls, or other

improvements. Soils within the City generally have low to moderate shrink-swell potential, except for the Ramona clay loam, which has a high potential. Thus, development associated with the General Plan Update could include development occurring on soils considered to be expansive. The potential hazards of expansive soils would be addressed largely through the integration of geotechnical information in the planning and design process for projects to determine the local soil suitability for specific projects in accordance with standard industry practices and state-provided requirements, such as CBC requirements that regulate the analysis of expansive soils. Geotechnical investigations would be required to thoroughly evaluate site-specific geotechnical characteristics of subsurface soils to assess potential hazards and recommend site preparation and design measures to address any hazards which may be present. These measures are enforced through compliance with the CBC to address hazards relating to unstable soils. Furthermore, policies included in the General Plan Update on pages 3.6-22 and 3.6-23 of the Certified EIR would address risk of exposure to geological hazards, including expansive soils, by mandating site-specific geotechnical investigation and mitigation prior to development, and continually upgrading the City's geotechnical reporting standards. The Certified EIR concluded that for these reasons, the impact related to hazards associated with expansive soils would be less than significant.

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

The Certified EIR stated that the entirety of the City is served by established wastewater conveyance and treatment services. Development allowed under the General Plan Update would connect to existing sewer trunk lines or future expansion of sewer trunk lines, and thus, would not require the use of septic tanks or alternative wastewater systems. The Certified EIR concluded that no impacts would occur.

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

The Certified EIR stated that future development proposals initiated under the General Plan Update that include construction-related ground disturbance (e.g., grubbing/clearing, grading, excavation, trenching, and boring) into previously undisturbed soils are activities that have potential to destroy paleontological resources. Future development that does not require ground-disturbing activities would cause no impacts on paleontological resources. Other development activities that include ground disturbance of heavily disturbed soils or engineered artificial fill would also cause no impact on significant paleontological resources since they have likely been displaced from previous disturbances (such as the original/previous construction), and there is very limited to no potential to encounter intact and significant resources in disturbed soils. However, intact significant resources may be encountered beneath the depth of previous disturbances or in pockets of undisturbed soils within existing developments.

Anticipated development in the Planning Area would occur through infill development on vacant property, and through redevelopment or revitalization of underutilized properties, which could result in damage to paleontological resources located at or near previously undisturbed ground surfaces as result of construction-related ground disturbance. In addition, infrastructure and other improvements requiring ground disturbance could result in damage to or destruction of paleontological resources buried below the ground surface.

The Los Angeles County Museum of History (LACM) has indicated that seven vertebrate localities from older Quaternary deposits have been recorded within the boundaries of the City and that several other localities from the same sedimentary deposits occur nearby. These fossil localities have yielded specimens of mammoth, camel, ray and dolphin at unknown depths and depths between 8 and 30 feet below surface. The LACM has also mentioned that grading or shallow excavations in the upper feet of the old lagoonal deposits (located at the surface in the northwest portion of the City) or the younger Quaternary Alluvium deposits (found in the central and eastern portions of the City) are unlikely to uncover fossil vertebrate remains. However, deeper excavations in the City reaching down into older Quaternary deposits, as well as excavations in older Quaternary deposits found at the surface have the potential for producing vertebrate fossils. Significant or unique paleontological resources have the potential to contribute to the geological and paleontological record of the region and may be of scientific importance to researchers. Any project that proposes ground disturbance could result in a significant impact on unique paleontological resources.

Applicable General Plan policies would help address the impact by requiring that project-specific paleontological studies be conducted for all future development that includes ground disturbance in previously undisturbed soils. Project-specific paleontological studies would include a site-specific database search through the LACM and/or other appropriate facilities; geologic map and scientific literature review; a pedestrian field survey (if deemed appropriate by the qualified professional paleontologist); assessment of the project area's paleontological sensitivity and paleontological monitoring requirements; and preparation of a technical report that documents the methods and results of the study. This paleontological study shall be prepared prior to approval of project plans. If the paleontological study determined that the project had a high potential for encountering subsurface paleontological resources, then the City would incorporate Policy OSEC-P-13 listed on page 3.6-27 of the Certified EIR as a project condition of approval, which requires resource monitoring and provides protocols if a paleontological resource is unearthed. Therefore, the Certified EIR concluded that the impact related to unique paleontological resources would be less than significant with adherence to the regulatory requirements in the General Plan policies.

3.7.2 Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

(a.i) Would the Project directly or indirectly cause potential substantial adverse effects, including the risk or loss, injury or death involving rupture of a known

earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?

The Project Site is not located within the boundaries of the Alquist-Priolo Earthquake Fault Zoning Map, and no known faults exist at the site. Thus, the Modified Project would not directly or indirectly cause potential substantial adverse effects, including the risk or loss, injury or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault. Therefore, the Modified Project would not result in new or increased significant impacts beyond those identified in the Certified EIR.

(a.ii) Would the Project directly or indirectly cause potential substantial adverse effects, including the risk or loss, injury or death involving strong seismic ground shaking?

The Project Site is located in a seismically active region and is experiences ground shaking during seismic events. As with all development in the state, the Modified Project would be required to comply with recommendations made in a Project-specific geotechnical report and all applicable Building Code standards, which would ensure the Modified Project would not directly or indirectly cause potential substantial adverse effects, including the risk or loss, injury or death involving strong seismic ground shaking. Therefore, the Modified Project would not result in new or increased significant impacts beyond those identified in the Certified EIR.

(a.iii) Would the Project directly or indirectly cause potential substantial adverse effects, including the risk or loss, injury or death involving seismic-related ground failure, including liquefaction?

The Project Site falls within the boundaries of a liquefaction zone. As with all development in the City, the Modified Project would be required to comply with recommendations made in a Project-specific geotechnical report and all applicable Building Code standards, which would ensure the Modified Project would not directly or indirectly cause potential substantial adverse effects, including the risk or loss, injury or death involving liquefaction. Therefore, the Modified Project would not result in new or increased significant impacts beyond those identified in the Certified EIR.

(a.iv) Would the Project directly or indirectly cause potential substantial adverse effects, including the risk or loss, injury or death involving landslides?

The Project Site and surrounding area are flat and do not contain landslides. Thus, the Modified Project would not directly or indirectly cause potential substantial adverse effects, including the risk or loss, injury or death involving landslides. Therefore, the Modified Project would not result in new or increased significant impacts beyond those identified in the Certified EIR.

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

In its existing condition, the Project Site is undeveloped. During storm events, water is either absorbed into the upper levels of the soil at the site and/or flows across the site to the local storm drain. It is possible that current water quality measures are not being implemented at the site. During both the Modified Project's construction and operational phases, the Modified Project would be required to comply with NPDES permit requirements and the City's Floodplain Management and Stormwater and Urban Runoff Pollution Control Ordinances, which prevent soil erosion and loss of topsoil and protect water quality. It is likely that the Project would reduce the potential for erosion to occur at the Project Site and would improve the quality of water leaving the site. Thus, the Modified Project would not result in substantial soil erosion or the loss of topsoil. Therefore, the Modified Project would not result in new or increased significant impacts beyond those identified in the Certified EIR.

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

As discussed, the Project Site and surrounding area are flat and do not contain landslides. The Project Site falls within the boundaries of a liquefaction zone. As with all development in the state, the Modified Project would be required to comply with recommendations made in a Project-specific geotechnical report and all applicable Building Code standards, which would ensure the Modified Project would not 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. Therefore, the Modified Project would not result in new or increased significant impacts beyond those identified in the Certified EIR.

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

Based on the *Geotechnical Investigation* prepared for the Project (refer to Attachment C), soils at the Project Site are considered expansive. As with all development in the City, the Modified Project would be required to comply with recommendations made in a Project-specific geotechnical report and all applicable Building Code standards, which would ensure that the Modified Project would not create a substantial direct or indirection risk to life or property as a result of expansive soils. Therefore, the Modified Project would not result in new or increased significant impacts beyond those identified in the Certified EIR.

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

The Modified Project would not use septic tanks or alternative wastewater disposal system. Thus, the Modified Project would not have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems. Therefore, the Modified Project would not result in new or increased significant impacts beyond those identified in the Certified EIR.

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

The Project Site is located in an urban area and is currently undeveloped. The Modified Project includes development of an infill site with 62 residential dwelling units, allowed under the existing zoning and land use designation for the site, as amended by the General Plan Amendment and Specific Plan Amendment that are part of the Modified Project. It is possible that unknown paleontological resources exist at the Project Site. However, the Applicant would be required to comply with the regulatory requirements in General Plan policies OSEC-P-12 and OSEC-P-13 listed on pages 3.6-26 and 3.6-27 of the Certified EIR if the Project would involve ground disturbance or excavations in undisturbed native soil, as also required by other projects analyzed in the Certified EIR. Thus, the Modified Project would not directly or indirectly destroy a unique paleontological resource or site or unique geologic feature. Therefore, the Modified Project would not result in new or increased significant impacts beyond those identified in the Certified EIR.

3.7.3 Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

No. As discussed above, the Modified Project would not result in any new or more severe significant impacts beyond what were identified in the Certified EIR.

3.7.4 Any New Information Requiring New Analysis or Verification?

No. There is no new information requiring new analysis or verification.

3.7.5 EIR's Mitigation Measures Addressing Impact

None required.

3.7.6 Conclusion

As discussed above, the Modified Project would not result in any of the conditions set forth in PRC Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Supplemental or Subsequent EIR.

3.8 GREENHOUSE GAS EMISSIONS

Issues (and supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
GREENHOUSE GAS EMISSIONS: Would the project:					
(a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	Less Than Significant	No	No	No	No
(b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	Less Than Significant	No	No	No	No

Impacts related to greenhouse gas emissions are discussed in the Certified EIR on pages 3.7-1 through 3.7-56.

3.8.1 Impact Determination in the EIR

(a) Would the Project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

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

Questions (a) and (b) were addressed together in the Certified EIR.

Construction

As discussed in the Certified EIR, the General Plan Update is a planning document, the approval of which would not directly result in the development of land uses and would not directly result in GHG emissions. Future GHG emissions may result from new development that could occur from adoption of the General Plan Update. Construction of future new development has the potential to generate GHG emissions through the use of heavy-duty construction equipment and through vehicle trips generated by construction workers and haul trips traveling to and from each specific project site. Construction emissions can vary substantially from day to day, depending on the level of activity and the specific type and amount of equipment. However, as there are no specific projects approved or proposed under the General Plan Update, and there is no knowledge as to timing of construction, location or the exact nature of future projects, analysis of construction emissions would be speculative at best. Information regarding specific development projects, including specific buildings and facilities to be constructed, construction schedules, quantities of grading, and other information would be required in order to provide a meaningful estimate of emissions. Since this information is unknown, emissions modeling is not feasible. Each future project developed under the General Plan

Update would be required to comply with applicable EPA, CARB and SCAQMD emissions standards, rules, and regulations as well as conduct their own applicable CEQA analysis and would determine significance based on the individual project specifics. Furthermore, future construction activities under the General Plan Update would be required to comply with the CARB Air Toxics Control Measure, which limits diesel powered equipment and vehicle idling to no more than five minutes at a location (13 CCR, Section 2485), CARB In-Use Off-Road Diesel Vehicle regulation, CARB Truck and Bus regulation, SAFE Vehicle Rule (or its successor rule), and CARB Advanced Clean Car and Advanced Clean Trucks regulations, all of which support the goals of the CARB Climate Change Scoping Plan by requiring construction equipment and vehicle fleet operators to repower or replace higher-emitting equipment with less polluting models, including zero- and near-zero-emissions on-road vehicle and truck technologies as they become developed and commercially available. Mandatory compliance with these rules and regulations would reduce GHG emissions, including fuel combustion emissions of carbon dioxide (CO_2), methane (CH_4), and nitrous oxide (N_2O), during future construction activities under the General Plan Update.

Operation

The Certified EIR stated that operation of future development under the General Plan Update would generate emissions of GHG emissions from vehicle trips traveling within the City, energy sources such as electricity demand and natural gas combustion, area sources such as fireplaces and landscaping equipment, water conveyance and distribution, wastewater treatment, and solid waste decomposition. The net change in operational emissions from existing conditions compared to existing plus buildout of new development under the General Plan Update at 2040 buildout would be negative compared to existing conditions primarily due to the focus of the General Plan Update on infill development and revitalization to help the City achieve an integrated land use mix that accommodates growth while reducing VMT and associated emissions, improvements in vehicle emissions standards and, to a lesser extent, improvements in building energy efficiency standards. Development of future new residential and non-residential uses would be based on market demand and would be constructed over the buildout duration through 2040.

The General Plan policies listed on pages 3.4-48 through 3.7-54 of the Certified EIR would reduce potential emissions from future new, as well as existing, development. In addition, future new development under the General Plan Update would be required to conduct their own CEQA analysis and would determine significance based on the individual project specifics. Through each project's individual environmental review process, potential impacts would be identified and compared against relevant thresholds. Individual projects that exceed the thresholds would normally result in a potentially significant impact and require mitigation.

Greenhouse Gas Reduction Plans, Policies, and Regulations

2017 Climate Change Scoping Plan

The General Plan Update would not conflict with state plans and regulatory requirements referenced in the 2017 Climate Change Scoping Plan, the purpose of which is to reduce statewide GHG emissions to 40 percent below 1990 levels by 2030. The 2017 Climate Change Scoping Plan outlines a framework that relies on a broad array of GHG reduction actions, which include direct regulations, alternative compliance mechanisms, incentives, voluntary actions, and market-based mechanisms such as the Cap-and-Trade program and builds off of a wide array of regulatory requirements that have been promulgated to reduce statewide GHG emissions, particularly from energy demand and mobile sources. According to the 2017 Climate Change Scoping Plan, reductions needed to achieve the 2030 target are expected to be achieved by increasing the RPS to 50 percent of the state's electricity by 2030, increasing the fuel economy of vehicles and the number of zero-emission or hybrid vehicles, reducing the rate of growth in VMT, supporting high speed rail and other alternative transportation options, and increasing the use of high efficiency appliances, water heaters, and HVAC systems.

The Certified EIR included a detailed analysis of the General Plan Update's consistency with the strategies outlined in the state's Climate Change Scoping Plan to reduce GHG emissions. The analysis concluded that the General Plan Update would not conflict with applicable 2017 Climate Change Scoping Plan strategies and regulations to reduce GHG emissions.

Policy Executive Order S-3-05

Even though the state has not developed a clear regulatory and technological roadmap to achieve the statewide 2050 GHG emissions reduction goal of 80 percent below 1990 levels, it has demonstrated the potential pace at which emission reductions can be achieved through new regulations as well as technology and market developments. As part of the 2017 Climate Change Scoping Plan, CARB, CEC, CPUC, and the California Independent System Operator (CAISO) commissioned a study that evaluates the feasibility and cost of meeting the 2030 target along the way to reaching the state's 2050 GHG emissions reduction goal. The California State Agencies' PATHWAYS project explores scenarios for meeting the state's long-term GHG emissions target, which affects all sectors of the California economy with detailed representations of the buildings, industry, transportation, and electricity sectors. The PATHWAYS study acknowledges the inherent uncertainty associated with its modeling assumptions and emphasizes the need for continued action and policy development by the state to support the development of low-carbon technologies and markets for energy efficiency, building electrification, renewable electricity, zero-emission vehicles, and renewable fuels.

The PATHWAYS study was updated in 2018 and concludes that market transformation is needed to reduce the capital cost and to increase the range of options available in order to achieve high levels of consumer adoption of zero carbon technologies, particularly of

electric vehicles and energy efficiency and electric heat in buildings. The PATHWAYS study suggests that market transformation can be facilitated by: (1) higher carbon prices (which can be created by the Cap and Trade and LCFS programs); (2) adoption of codes and standards, regulations, and direct incentives to reduce the upfront cost to the customer; and (3) business and policy innovations to make zero-carbon technology options the more affordable and preferred solutions compared to fossil fueled alternatives. It is reasonable to expect the GHG emissions from future development anticipated by the General Plan Update would decline over time, as the regulatory initiatives identified by CARB in the 2017 Climate Change Scoping Plan and future updates to the Scoping Plan are developed and implemented, along with other technological innovations and market developments that occur. Given the reasonably anticipated decline in emissions, the Certified ERIR concluded that the General Plan Update would not conflict with or interfere with the ability of the state to achieve the 2050 horizon-year goal of EO S-3-05.

2020–2045 Regional Transportation Plan/Sustainable Communities Strategy

The purpose of the 2020–2045 RTP/SCS is to achieve the regional per capita GHG reduction targets for the passenger vehicle and light-duty truck sector established by CARB pursuant to SB 375. SCAG's Program EIR for the 2020–2045 RTP/SCS, certified on May 7, 2020, states that "[e]ach [metropolitan planning organization] is required to prepare an SCS as part of their RTP in order to meet these GHG emissions reduction targets by aligning transportation, land use, and housing strategies with respect to [Senate Bill] 375." The 2020–2045 RTP/SCS seeks improved mobility and accessibility, which is defined as "the ability to reach desired destinations with relative ease and within a reasonable time, using reasonably available transportation choices."

The 2020–2045 RTP/SCS seeks to implement strategies that "alleviates development pressure in sensitive resource areas by promoting compact, focused infill development in established communities with access to high-quality transportation." Furthermore, the 2020–2045 RTP/SCS includes "more compact, infill, walkable and mixed-use development strategies to accommodate new region's growth" and "accommodate increases in population, households, employment, and travel demand." Moreover, the 2020–2045 RTP/SCS states that while "[t]ransportation emissions are most prevalent relative to all other sectors in California and specifically in the SCAG region," the RTP/SCS would focus "growth in existing urban regions and opportunity areas, where transit and infrastructure are already in place. Locating new growth near bikeways, greenways, and transit would increase active transportation options and the use of other transit modes, thereby reducing number of vehicle trips and trip lengths and associated emissions."

In order to assess the General Plan Update's potential to conflict with the 2020–2045 RTP/SCS, the Certified EIR included a detailed analysis of the General Plan Update's consistency with the strategies and policies set forth in the 2020–2045 RTP/SCS to meet GHG emission-reduction targets set by CARB. Generally, projects are considered to not conflict with applicable City and regional land use plans and regulations, such as SCAG's

2020–2045 RTP/SCS, if they are compatible with the general intent of the plans and would not preclude the attainment of their primary goals. The Certified EIR concluded that the General Plan Update would not conflict with the 2020–2045 RTP/SCS goals.

City of Carson Climate Action Plan

Through the City's EECAP, the City has established goals and strategies that would reduce GHG emissions. The CAP reduction measures primarily focus on ways to reduce energy as energy usage accounted for 70 percent of all City GHG emissions in 2012. As outlined in the CAP, the City is focusing on increasing energy efficiency and reducing GHG emissions from energy to meet attainment goals. In addition to CAP energy efficiency goals, utility providers (such as SCE) are required to provide 60 percent of their electricity supply from renewable sources by the year 2030, further reducing the demand on nonrenewable sources.

The City's CAP identifies community-wide strategies to lower energy use. Energy reductions within the CAP are from transportation, land use, energy generation and consumption, water consumption and waste generation. The General Plan Update incorporates CAP goals and policies for energy efficiency and renewable energy, including electric vehicle charging, which would source transportation energy from renewable sources in accordance with the RPS.

Future development that could occur under the General Plan Update would comply with CALGreen energy-efficiency requirements, which would be consistent with CAP goals for increasing energy and water use efficiency in new residential and commercial developments. Thus, new development under the General Plan Update would incorporate CAP goals and policies as part of future development approvals and would not result in conflicts with the plan.

Through the City's EECAP, the City has established goals and strategies that would reduce energy use. The EECAP focuses on increasing energy efficiency and reducing GHG emissions from energy to meet attainment goals. In addition to EECAP energy efficiency goals, utility providers (such as SCE) are required to provide 60 percent of their electricity supply from renewable sources by the year 2030 per SB 100, further reducing the GHG intensity of supplied electricity. New development under the General Plan Update would comply with CALGreen energy-efficiency requirements, which would be consistent with EECAP goals for increasing energy and water use efficiency in new residential and commercial developments. The Certified EIR concluded that based on the information above, new development under the General Plan Update would comply with plans, policies and regulations for reducing GHG emissions and this impact would be less than significant.

3.8.2 Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

(a) Would the Project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

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

As with the Certified EIR, Questions (a) and (b) are addressed together.

Consistent with the Certified EIR, as a project under the General Plan Update, the Modified Project is required to comply with applicable EPA, CARB and SCAQMD emissions standards, rules, and regulations. Furthermore, the Modified Project's construction activities are required to comply with the CARB ATCM, which limits diesel powered equipment and vehicle idling to no more than five minutes at a location, CARB In-Use Off-Road Diesel Vehicle regulation, CARB Truck and Bus regulation, SAFE Vehicle Rule (or its successor rule), and CARB Advanced Clean Car and Advanced Clean Trucks regulations, all of which support the goals of the CARB Climate Change Scoping Plan by requiring construction equipment and vehicle fleet operators to repower or replace higher-emitting equipment with less polluting models, including zero- and near-zero-emissions on-road vehicle and truck technologies as they become developed and commercially available.

The Modified Project would comply with the applicable General Plan policies listed on pages 3.7-48 through 3.7-54 of the Certified EIR that would reduce the Modified Project's GHG emissions. Additionally, the Modified Project would comply with CALGreen energy-efficiency requirements, which would be consistent with EECAP goals for increasing energy and water use efficiency in new residential development.

Also, consistent with the Certified EIR, a Project-specific GHG emissions analysis was conducted, is included as Attachment D, and is summarized below.

Project Emissions

In support of the consistency analysis for the Project below that describes the Project's compliance with, or exceedance of performance-based standards included in the regulations and policies outlined in the applicable portions of the *Climate Change Scoping Plan*, the 2024-2050 RTP/SCS, the City's General Plan Open Space and Environmental Conservation Element, and the CAP, quantitative calculations are provided in Tables 6 and 7.

The Project would generate direct and indirect GHG emissions because of different types of emissions sources, including the following:

- Construction: emissions associated with demolition of the existing motel uses and parking areas, shoring, excavation, grading, and construction-related equipment and vehicular activity;

- Area source: emissions associated with landscape equipment;
- Energy source (building operations): emissions associated with electricity and natural gas use for space heating and cooling, water heating, energy consumption, and lighting;
- Stationary source: emissions associated with stationary equipment (e.g., emergency generators);
- Mobile source: emissions associated with vehicles accessing the Project Site;
- Solid Waste: emissions associated with the decomposition of the waste, which generates methane based on the total amount of degradable organic carbon; and
- Water/Wastewater: emissions associated with energy used to pump, convey, deliver, and treat water.
- Refrigerants: These are substances used in equipment for air conditioning and refrigeration. Most refrigerants are HFCs or blends of them, which can have high GWP values.
- Vegetation: emissions from land use change and changes in sequestration from tree removal and planting.

Table 6
Combined Construction-Related Emissions ($MTCO_2e$)

Year	$MTCO_2e$[a]
2025	192
2026	363
Total	**555**
Amortized Over 30 Years	**18**

[a] *CO_2e was calculated using CalEEMod version 2022.1.1.29.*

Source: DKA Planning, 2024. Refer to Attachment D.

Table 7
Annual GHG Emissions Summary (Buildout)[a]
(metric tons of carbon dioxide equivalent [MTCO2e])

Year	$MTCO_2$[a]
Area[b]	1
Energy[c] (electricity and natural gas)	74
Mobile	426
Solid Waste[d]	17
Water/Wastewater[e]	6
Refrigerants	<1
Vegetation	2
Construction	18
Total Emissions	**544**

[a] *CO_2e was calculated using CalEEMod.*
[b] *Area source emissions are from landscape equipment and other operational equipment only; hearths omitted.*
[c] *Energy source emissions are based on CalEEMod default electricity and natural gas usage rates.*
[d] *Solid waste emissions are calculated based on CalEEMod default solid waste generation rates.*
[e] *Water/Wastewater emissions are calculated based on CalEEMod default water consumption rates.*

Source: DKA Planning, 2024. Refer to Attachment D.

Consistency with Applicable Plans and Policies

Statewide: Climate Change Scoping Plan

Jurisdictions that want to take meaningful climate action (such as preparing a non-CEQA-qualified CAP or as individual measures) aligned with the State's climate goals in the absence of a CEQA-qualified CAP should also look to the three priority areas (transportation electrification, VMT reduction, and building decarbonization). To assist local jurisdictions, the 2022 Scoping Plan Update presents a non-exhaustive list of impactful GHG reduction strategies that can be implemented by local governments within the three priority areas (Priority GHG Reduction Strategies for Local Government Climate Action Priority Areas). A detailed assessment of goals, plans, policies implemented by the City that would support the GHG reduction strategies in the three priority areas is provided below. In addition, further details are provided regarding the correlation between these reduction strategies and applicable actions included in Table 2-1 (page 72) of the Scoping Plan (Actions for the Scoping Plan Scenario).

Transportation Electrification

The priority GHG emissions reduction strategies for local government climate action related to transportation electrification are discussed below and would support the

Scoping Plan action to have 100 percent of all new passenger vehicles to be zero-emission by 2035 (see Table 2-1 of the Scoping Plan).

- **Convert local government fleets to zero-emission vehicles (ZEV)**

CARB approved the Advanced Clean Cars II rule which codifies Executive Order N-79-20 and requires 100 percent of new cars and light trucks sold in California be zero-emission vehicles by 2035. The State has also adopted AB 2127, which requires the CEC to analyze and examine charging needs to support California's EVs in 2030. This analysis would help decision-makers allocate resources to install new EV chargers where they are needed most.

On April 18, 2023, the City adopted a Zero-Emission Bus Rollout Plan that calls for a full transition to zero-emission buses by 2032. This was to include purchasing four battery-electric buses by 2032 to replace compressed natural gas and diesel buses and did not involve early retirement of conventional transit buses. In March 2021, the City also approved a fiscal year 23/24 vision for a multi-year fleet replacement plan that prioritizes the transition to electric vehicles. This includes developing a plan to transition some diesel- and gas-powered equipment to electric technology.

The City's goals of converting the municipal fleet to zero emissions would be consistent with the Scoping Plan goals of transitioning to EVs. Although this measure mainly applies to City fleets, the Project would not conflict with these goals by installing EV charging stations and pre-wiring other spaces for future charging facilities.

- **Create a jurisdiction-specific ZEV ecosystem to support deployment of ZEVs statewide (such as building standards that exceed state building codes, permit streamlining, infrastructure siting, consumer education, preferential parking policies, and ZEV readiness plans)**

The State has adopted AB 1236 and AB 970, which require cities to adopt streamline permitting procedures for EV charging stations. As a result, the City uses the CALGreen 2022 requirements of 20 percent of new parking spaces as EV capable. The ordinance also requires new construction to install electric vehicle supply equipment (EVSE) at 10 percent of total parking spaces. This requirement also exceeds the CALGreen 2022 requirements of installing EVSE)for 25 percent of EV capable parking spaces.

The City also has committed to modifications to its Corporate Yard to facilitate the bus fleet's transition to zero-emission vehicles. This included new electric charging stations at its municipal facility at 18601 South Main Street by 2025.

The City's goals of installing EV chargers throughout the City and at its Corporate Yard would be consistent with the Scoping Plan goals of transitioning to EVs. The Project would contribute to this by installing EV charging stations and pre-wiring other spaces for future charging facilities.

VMT Reduction

The priority GHG reduction strategies for local government climate action related to VMT reduction are discussed below and would support the Scoping Plan action to reduce VMT per capita 25 percent below 2019 levels by 2030 and 30 percent below 2019 levels by 2045.

- **Reduce or eliminate minimum parking standards in new developments**
- **Implement parking pricing or transportation demand management pricing strategies**

The CAP includes a number of policies that would advance these parking strategies that would reduce VMT. This includes a policy that reduces or eliminates parking minimums in new development (Policy LUT: E1.1) and another that reduces or eliminates parking minimums for mixed-use, pedestrian, and transit-oriented development. This also includes policies calling for free parking for electric vehicles (Policy LUT: A1.1) and lower parking minimums for projects providing electric vehicle parking (Policy LUT: A1.3). The CAP also calls for unbundling parking from property costs (Policy LUT: E2.1) and implementing on-street market pricing (LUT: E3.1).

While the State calls for the City to implement these Citywide policies, the Project would not conflict with this reduction strategy to reduce parking standards.

- **Implement Complete Streets policies and investments, consistent with general plan circulation element requirements**

Carson developed a Complete Streets and Green Streets Policy in May 2022 that call for balanced infrastructure investments that support active transportation and public transit. The City adopted an Active Transportation Plan in June 2015 calls for creation of citywide pedestrian neighborhoods, bicycle infrastructure, and transit improvements that would advance Complete Streets policies.

This reduction strategy mainly applies to infrastructure investments that address traffic circulation. Nevertheless, the Project would not conflict with implementation of Complete Streets policies.

- **Increase access to public transit by increasing density of development near transit, improving transit service by increasing service frequency, creating bus priority lanes, reducing or eliminating fares, microtransit, etc.**
- **Increase public access to clean mobility options by planning for and investing in electric shuttles, bike share, car share, and walking**
- **Amend zoning or development codes to enable mixed-use, walkable, transit-oriented, and compact infill development (such as increasing the allowable density of a neighborhood)**

- **Preserve natural and working lands by implementing land use policies that guide development toward infill areas and do not convert "greenfield" land to urban uses (e.g., green belts, strategic conservation easements).**

These reduction strategies are supported through implementation of SB 375 which requires integration of planning processes for transportation, land-use and housing and generally encourages jobs/housing proximity, promote transit-oriented development (TOD), and encourages high-density residential/commercial development along transit corridors. To implement SB 375 and reduce GHG emissions by correlating land use and transportation planning, SCAG adopted the 2020–2045 RTP/SCS, also referred to as Connect SoCal. The 2020–2045 RTP/SCS' "Core Vision" prioritizes the maintenance and management of the region's transportation network, expanding mobility choices by co-locating housing, jobs, and transit, and increasing investment in transit and complete streets.

The Project is an infill development in an urbanized area that would concentrate new development consistent with the growth pattern encouraged in the 2020-2045 RTP/SCS. The Project's convenient access to public transit and opportunities for walking and biking would reduce vehicle trips, VMT, and GHG emissions. The Project Site's proximity to commercial uses and services would encourage residents to walk to nearby destinations to meet their shopping needs, thereby reduce VMT and GHG emissions. Therefore, the Project would be consistent with these reduction strategies.

California continues to experience a severe housing shortage. The State must plan for more than 2.5 million residential units over the next eight years, and no less than one million of those residential units must be affordable to lower-income households. This represents more than double the housing planned for during the last eight years. The housing crisis and the climate crisis must be confronted simultaneously, and it is possible to address the housing crisis in a manner that supports the State's climate and regional air quality goals. CAPCOA's Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity (CAPCOA's Handbook) provides a VMT reduction measurement for incorporation of low-income housing. Measure T-4 (Integrate Affordable and Below Market Rate Housing) shows a 28.6 percent reduction in VMT for low-income units in comparison to market rate units.

The City's Housing Element of the General Plan provides planning guidance in meeting housing needs identified in the SCAG Regional Housing Needs Assessment (RHNA). The Housing Element identifies measures to encourage development of affordable housing such as revising density bonuses for affordable housing; identify locations which are ideal for funding programs to meet low-income housing goals; and rezone areas to encourage low-income housing. The Housing Element estimates that implementation of these measures would increase housing production at all income ranges compared to previous cycles.

The Project would expand the supply of housing in the City of Carson. Further, the Project's location in an urbanized area with access to transportation alternatives would help reduce living costs and further the City's goals for promoting housing.

Building Decarbonization

The priority GHG emissions reduction strategies for local government climate action related to electrification are discussed below and would support the Scoping Plan actions regarding meeting increased demand for electrification without new fossil gas-fire resources and all electric appliances beginning in 2026 (residential) and 2029 (commercial) (see Table 2-1 of the Scoping Plan).

- **Adopt all-electric new construction reach codes for residential and commercial uses**

California's transition away from fossil fuel–based energy sources will bring the project's GHG emissions associated with building energy use down to zero as our electric supply becomes 100 percent carbon free. California has committed to achieving this goal by 2045 through SB 100, the 100 Percent Clean Energy Act of 2018. SB 100 strengthened the State's Renewables Portfolio Standard (RPS) by requiring that 60 percent of all electricity provided to retail users in California come from renewable sources by 2030 and that 100 percent come from carbon-free sources by 2045. The land use sector will benefit from RPS because the electricity used in buildings will be increasingly carbon-free, but implementation does not depend (directly, at least) on how buildings are designed and built.

The City has updated the Building Code with requirements for all new buildings which will reduce GHG emissions related to natural gas combustion. Space heating, water heating and cooking for non-restaurant uses would be required to be powered by electricity. In future years, SCE will be required to increase the amount of renewable energy in the power mix to comply with SB 100 requirements. The increasing availability of renewable energy will serve to reduce GHG emissions from sources traditionally powered by natural gas. Therefore, the Project would be consistent with the Building Code and not conflict with State and local decarbonization objectives.

- **Adopt policies and incentive programs to implement energy efficiency retrofits for existing buildings, such as weatherization, lighting upgrades, and replacing energy-intensive appliances and equipment with more efficient systems (such as Energy Star-rated equipment and equipment controllers)**

This reduction strategy would support the Scoping Plan action regarding electrification of appliances in existing residential buildings (see Table 2-1 of the Scoping Plan). The City and SCE have established rebate programs to promote use of energy-efficient products and home upgrades.

While the Project would not involve retrofit of existing buildings, it would design the HVAC system to be compliant with Title 24 and green building codes for energy efficiency.

Table 6 on pages 41 through 49 of the GHG Emissions Impacts analysis in Attached D evaluates the Project's consistency with applicable reduction actions/strategies by emissions source category outlined in the *2022 Climate Change Scoping Plan Update*. When compared to SB 32, the Proposed Project would be consistent with its objectives and the GHG reduction-related actions and strategies of the 2022 Scoping Plan. Table 6 confirms that the Project is consistent with the Scoping Plan's focus on increasing renewable energy use, imposing tighter limits on the carbon content of gasoline and diesel fuel, putting more electric cars on the road, improving energy efficiency, and curbing emissions from key industries. Although a number of these strategies are currently promulgated, some have not yet been formally proposed or adopted. It is expected that these measures or similar actions to reduce GHG emissions will be adopted as required to achieve statewide GHG emissions targets. Based on the following analysis, the Project would be consistent with the State's Climate Change Scoping Plan's objective of achieving carbon neutrality statewide by 2045 and reducing 2030 GHG emissions in accord with SB 32.

Based on the analysis in Table 6, the Project would be consistent with the State's 2022 Climate Change Scoping Plan.

In addition to the Project's consistency with applicable GHG emissions reduction regulations and strategies, the Project would not conflict with future anticipated statewide GHG emissions reductions goals. Specifically, CARB has outlined strategies for achieving the 2030 reduction target of 40 percent below 1990 levels, as mandated by SB 32 as well as carbon neutrality by 2045. These strategies include renewable resources for the state's electricity, increasing the fuel economy of vehicles and the penetration of zero-emission or hybrid vehicles into the vehicle fleet, reducing the rate of growth in VMT, supporting high-speed rail and other alternative transportation options, and use of high-efficiency appliances, water heaters, and HVAC systems.

The Project would also benefit from statewide and utility-provider efforts towards increasing the portion of electricity provided from renewable resources. SCE has committed to increasing renewable sources that exceed the Renewables Portfolio Standard requirements. The Project would include energy efficient mechanical systems, energy efficient glazing and window frames, Energy-Star appliances to be installed on-site, and the use of high-efficiency lighting. The Project would also benefit from statewide efforts to improve fuel economy of vehicles. The Project would also help reduce VMT growth given its design and location at an infill site that is accessible to existing public transit.

Regional: 2024-2050 Regional Transportation Plan/Sustainable Communities Strategy

Table 7 provides a comparison of the Project against the GHG-related performance measures of the 2024-2050 RTP/SCS

As demonstrated above and in Attachment D, the Modified Project would not generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment and would not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHG emissions. For these reasons, the Modified Project would not result in new or increased significant impacts beyond those identified in the Certified EIR.

3.8.3 Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

No. As discussed above, the Modified Project would not result in any new or more severe significant impacts beyond what were identified in the Certified EIR.

3.8.4 Any New Information Requiring New Analysis or Verification?

No. There is no new information requiring new analysis or verification.

3.8.5 EIR's Mitigation Measures Addressing Impact

None required.

3.8.6 Conclusion

As discussed above, the Modified Project would not result in any of the conditions set forth in PRC Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Supplemental or Subsequent EIR.

3.9 HAZARDS AND HAZARDOUS MATERIALS

Issues (and supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
HAZARDS AND HAZARDOUS MATERIALS: Would the project:					
(a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	Less Than Significant	No	No	No	No
(b) Create a significant hazard to the public or the environment through the reasonably foreseeable upset and accident conditions involving the likely release of hazardous materials into the environment?	Less Than Significant	No	No	No	No
(c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	Less Than Significant	No	No	No	No
(d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code §65962.5 and, as a result, would it create a significant hazard to the public or the environment?	Less Than Significant	No	No	No	No
(e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	No Impact	No	No	No	No
(f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	Less Than Significant	No	No	No	No
(g) Expose people or structures either directly or indirectly to a significant risk of loss, injury or death involving wildland fires?	No Impact	No	No	No	No

Impacts related to hazards and hazardous materials are discussed in the Certified EIR on pages 3.8-1 through 3.8-38.

3.9.1 Impact Determination in the EIR

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

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

Questions (a) and (b) were addressed together in the Certified EIR.

Construction

As discussed in the Certified EIR, during the construction phase of a project, construction equipment and materials would include fuels, oils and lubricants, solvents and cleaners, cements and adhesives, paints and thinners, degreasers, cement and concrete, and asphalt mixtures, which are all commonly used in construction. Routine uses of any of these substances could pose a hazard to people or the environment and would be considered potentially significant.

Construction activities would be required to comply with numerous hazardous materials regulations designed to ensure that hazardous materials are transported, used, stored, and disposed of in a safe manner to protect worker safety, and to reduce the potential for a release of construction-related fuels or other hazardous materials into the environment, including stormwater and downstream receiving water bodies. Contractors would be required to prepare and implement hazardous materials business plans (HMBPs) that would require that hazardous materials used for construction would be used properly and stored in appropriate containers with secondary containment to contain a potential release. In Los Angeles County, HMBPs are submitted to the local Certified Unified Program Agency (CUPA), Los Angeles County Fire Department (LACFD) Health Hazardous Materials Division (HHMD), for their review for compliance with hazardous materials regulations. The California Fire Code would also require measures for the safe storage and handling of hazardous materials, which are included in the CUPA review of HMBPs.

Construction contractors would be required to prepare a SWPPP for construction activities according to NPDES General Construction Permit requirements. The SWPPP would list the hazardous materials (including petroleum products) proposed for use during construction; describe spill prevention measures, equipment inspections, equipment and fuel storage; protocols for responding immediately to spills; and describe BMPs for controlling site runoff. The SWPPP would be submitted to the RWQCB, which would review both the SWPPP and the required inspection reports for compliance with the Construction General Permit.

In addition, the transportation of hazardous materials would be regulated by the US Department of Transportation (USDOT), Caltrans, and the California Highway Patrol (CHP). Together, federal and state agencies determine driver-training requirements, load labeling procedures, and container specifications designed to minimize the risk of accidental release.

Next, in the event of a spill that releases hazardous materials at a project site, a coordinated response would occur at the federal, state, and local levels. The LACFD HHMD is the local hazardous materials response team. In the event of a hazardous materials spill, the police and fire departments would be simultaneously notified and sent to the scene to respond and assess the situation.

Finally, implementation of some projects may include the demolition and removal of existing buildings and structures. Some buildings and structures may include hazardous building materials, such as asbestos-containing materials (ACM), lead-based paint (LBP), polychlorinated biphenyls (PCBs), mercury, and Freon. If improperly managed, the demolition activities could result in exposures to construction workers, the public, and the environment. Numerous existing regulations require that demolition and renovation activities that may disturb or require the removal of materials that consist of, contain, or are coated with ACM, LBP, PCBs, mercury, Freon, and other hazardous materials must be inspected and/or tested for the presence of hazardous materials. If present, the hazardous materials must be managed and disposed of in accordance with applicable laws and regulations. Compliance with existing regulations is a condition of demolition and construction permits.

In the case of ACM and LBP, all work must be conducted by a State-certified professional, which would ensure compliance with all applicable regulations. If ACM and/or LBP are determined to exist onsite, a site-specific hazard control plan must be prepared detailing removal methods and specific instructions for providing protective clothing and equipment for abatement personnel. A State-certified LBP and/or an ACM removal contractor would be retained to conduct the appropriate abatement measures as required by the plan. Wastes from abatement and demolition activities would be disposed of at a landfill permitted to accept such waste. Once all abatement measures have been implemented, the contractor would conduct a clearance examination and provide written documentation to the appropriate regulatory agency documenting that testing and abatement have been completed in accordance with all federal, State, and local laws and regulations. Equipment and materials with PCBs, mercury, and Freon, are managed thru the Universal Waste Rule. In the case of PCBs, electrical transformers and older fluorescent light ballasts not previously tested and verified to not contain PCBs must be tested. If PCBs are detected above action levels, the materials must be disposed of at a licensed facility permitted to accept the materials. In the case of mercury in fluorescent light tubes and switches, the identification, removal, and disposal of the materials must be removed without breakage and disposed of at a licensed facility permitted to accept the materials. In the case of Freon or other refrigerants, the refrigerants must be directed to licensed

recycling and reuse facilities permitted to handle the refrigerants. The Certified EIR concluded that compliance with the numerous laws and regulations discussed above that govern the transportation, use, handling, and disposal of hazardous building materials would limit the potential for impacts due to the transportation, use, handling, disposal, or accidental release of hazardous building materials, and thus, this impact would be less than significant.

Operation

As discussed in the Certified EIR, once constructed, projects operating within the City may use chemicals associated with their particular business, some of which may be hazardous materials. The routine use or an accidental spill of hazardous materials could result in inadvertent releases, which could adversely affect construction workers, the public, and the environment. Businesses that use hazardous materials would be required to prepare and implement a HMBP that would require that hazardous materials used in operations be used properly, stored in appropriate containers with secondary containment to contain a potential release, and disposed of at facilities permitted to accept the waste. All hazardous materials are required to be stored and handled according to manufacturer's directions and local, State and federal regulations. The California Fire Code would also require measures for the safe storage and handling of hazardous materials. In addition, businesses would be required to comply with the local MS4 permit development standards, which would reduce pollutants and runoff flows from new developments using BMPs and Low Impact Development (LID)/post-construction standards.

The General Plan Update also includes Guiding Policies CSES-G-7 and CSES-G-14 through CSES-G-16 and Implementing Policies CSES-P-25 through CSES-P-30, CSES-P-33, and CSES-P-35, which would "minimize the threat to the public health and safety and to the environment posed by a release of hazardous materials," would help to reduce any impacts associated with the use, transportation, disposal, or accidental release of hazardous materials. The Certified EIR concluded that compliance with the numerous laws and regulations discussed above that govern the transportation, use, handling, and disposal of hazardous materials would limit the potential for impacts due to the transportation, use, handling, disposal, or accidental release of hazardous materials, and thus this impact would be less than significant.

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

As discussed in the Certified EIR, there are numerous schools within the City limits, and many projects associated with the General Plan Update would likely be located within one-quarter mile of one or more schools. The construction and operations activities discussed previously could include the use of hazardous materials. If the site using hazardous materials is located within one-quarter mile of a school, a release could

adversely affect a school. However, required compliance with the numerous laws and regulations that govern the transportation, use, handling, and disposal of hazardous materials and adherence with General Plan Guiding Policies CSES-G-7 and CSES-G-14 through CSES-G-16 and Implementing Policies CSES-P-25 through CSES-P-30, CSES-P-33, and CSESP-35 would limit the potential for creation of hazardous conditions due to the use or accidental release of hazardous materials, and as concluded in the Certified EIR, would render this impact less than significant.

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

As discussed in the Certified EIR, both active and closed hazardous materials investigation and cleanup sites are located within the City limits. Active sites are currently undergoing investigation and cleanup. If a project is located on or near an active site, the construction activities may encounter soil and/or groundwater with chemical concentrations above screening levels that could adversely affect workers, the public, and the environment. In addition, although the closed sites would not be anticipated to have chemicals in soil and/or groundwater at concentrations above screening levels, construction activities may encounter residual levels of chemicals. Finally, construction activities could also encounter currently unknown hazardous materials that are not currently listed but would be upon their discovery. The impact of encountering hazardous materials would be reduced to less than significant through the implementation of General Plan Guiding Policies CSES-G-7 and CSES-G-14 through CSES-G-16 and Implementing Policies CSES-P-25 through CSES-P-30, CSES-P-33, and CSES-P-35, which requires the minimization of threats to the public health and safety and to the environment posed by a release of hazardous materials. Compliance with these policies and applicable regulations would ensure that plans would be in place that provide procedures for the testing, handling, disposal, and remediation of hazardous materials. Therefore, the Certified EIR concluded the impact would be less than significant.

(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?

As discussed in the Certified EIR, Compton/Woodley Airport is the only airport located within two miles of the City limits. The Compton/Woodley Airport is included in the Los Angeles County Airport Land Use Plan (ALUP), which requires that new development in the City not fall within the airports noise contours or airport influence area. Per the requirements of the Los Angeles County ALUP, new non-conforming land uses or major new development projects would be subject to review for compatibility by the County's Airport Land Use Commission. The ALUP contains designated zones within which certain off-airport activities would be deemed incompatible, such as the construction of structures that exceed certain heights, facilities that could attract birds and other wildlife that could

pose a hazard to aviation, and the construction of uses that would be at risk in the event of an aviation accident (schools, hospitals, etc.). By law, the Commission is vested with the legal authority to require modification of proposed projects that could conflict with safe and efficient airport operations. Accordingly, if any off-airport projects are proposed within these designated zones, they would be required to undergo review and approval by the Commission, and a determination of consistency with the ALUP would have to be made. As such, new projects in the vicinity of the airport would need to be consistent with the ALUP, and safety hazards for people working and/or residing in the area would be avoided. Additionally, the implementation of General Plan Guiding Policies NO-G-1 and NO-G-2 and Implementing Policy NO-P-1, would ensure maximum efficiency in noise abatement efforts, would reduce any impacts associated with noise hazards. Accordingly, development associated with the General Plan Update would not place people or structures in such a manner as to create a safety or noise hazard. The Certified EIR concluded the impact would therefore be less than significant.

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

As discussed in the Certified EIR, the General Plan Update includes Implementing Policies CSES-P-27, CSES-P-30 through CSES-P-32, and CSES-P-34, which would require the City to ensure emergency planning, designated evacuation routes, safe access routes to communication centers, hospitals, airports, staging areas, and fuel storage sites, and that projects provide adequate road standards, driveway widths, and road clearances around structures consistent with local and State requirements to ensure adequate emergency access. New projects would be required to be consistent with these policies. Therefore, the Certified EIR concluded the impact relative to proximity to an emergency response or evacuation would be less than significant.

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

As discussed in the Certified EIR, according to the map of Very Fire Hazard Severity Zones in LRA for Los Angeles County, the City is not within a VHFHSZ, nor is it in the vicinity of one. Nevertheless, all construction activities would be required to comply with all applicable fire protection and prevention regulations specified in the California Fire Code, Hazardous Materials Transportation regulations, and Cal/OSHA regulations. These requirements include various measures such as accessibility of firefighting equipment, proper storage of combustible liquids, no smoking in service and refueling areas, and worker training for firefighter extinguisher use. In addition, General Plan Implementing Policy CSES-P-34, which serves to minimize the effects from natural and urban disasters to reduce impacts to the community, requires coordination efforts with the LACFD to ensure their capability to address fires. Compliance with all applicable regulations and plans would further minimize the potential for construction activities to cause a wildland fire.

The General Plan Update also includes Implementing Policies CSES-P-27, CSES-P-30 through CSES-P-32, and CSES-P-34, which serve to identify, establish, and maintain safe emergency procedures and evacuation routes. These policies would encourage greater cooperation with LACFD to ensure their capability to address fires and other emergencies. In addition, facilities that use or store hazardous and flammable materials would be required to comply with all applicable fire codes and fire protection requirements established by the California Fire Code, Hazardous Materials Transportation regulations, and Cal/OSHA requirements. As such, the Certified EIR concluded that the operation of projects would not substantially increase the risk of wildland fires within the project area. For these reasons, the General Plan Update would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires, and thus, there would be no impact.

3.9.2 Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

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

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

As with the Certified EIR, questions (a) and (b) are addressed together.

The Project Site is located in an urban area and is currently undeveloped. The Modified Project includes development of an infill site with 62 residential dwelling units, allowed under the existing zoning and land use designation for the site, as amended by the General Plan Amendment and Specific Plan Amendment that are part of the Modified Project. As a residential development, the Modified Project's construction and operational phases would use typical potentially hazardous materials, such as paint, petroleum products, and cleaning products. Consistent with the Certified EIR, all of the Modified Project's construction and operational activities would be required to comply with the numerous laws and regulations discussed in the Certified EIR that govern the transportation, use, handling, and disposal of hazardous building materials would limit the potential for impacts due to the transportation, use, handling, disposal, or accidental release of hazardous building materials, in addition to applicable General Plan Update policies listed on pages 3.8-29 through 3.8-31 of the Certified EIR. Thus, the Modified Project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. Therefore, the Modified Project would not result in new or increased significant impacts beyond those identified in the Certified EIR.

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

The Project Site is located in an urban area and is currently undeveloped. There are no existing or proposed schools within 0.25 miles of the Project Site. The school closest to the site is the Carnegie Middle School located approximately 0.6 miles to the southwest. The Modified Project includes development of an infill site with 62 residential dwelling units, allowed under the existing zoning and land use designation for the site, as amended by the General Plan Amendment and Specific Plan Amendment that are part of the Modified Project. As a residential development, the Modified Project's construction and operational phases would use typical potentially hazardous materials, such as paint, petroleum products, and cleaning products. Consistent with the Certified EIR, all of the Modified Project's construction and operational activities would be required to comply with the numerous laws and regulations discussed in the Certified EIR that govern the transportation, use, handling, and disposal of hazardous building materials would limit the potential for impacts due to the transportation, use, handling, disposal, or accidental release of hazardous building materials, in addition to applicable General Plan Update policies listed on pages 3.8-29 through 3.8-31 of the Certified EIR. Thus, the Modified Project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. Therefore, the Modified Project would not result in new or increased significant impacts beyond those identified in the Certified EIR.

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

The Project Site is not included on a list of hazardous materials sites compiled pursuant to Government Code §65962.5.[1] Therefore, the Modified Project would not result in new or increased significant impacts beyond those identified in the Certified EIR.

(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?

The Project Site is not 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. Therefore, the Modified Project would not result in new or increased significant impacts beyond those identified in the Certified EIR.

---

1 *Envirostor, https://www.envirostor.dtsc.ca.gov/public/map/?global_id=60000842&zl=12, accessed December 11, 2024.*

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

The Modified Project includes development of an infill site with 62 residential dwelling units, allowed under the existing zoning and land use designation for the site, as amended by the General Plan Amendment and Specific Plan Amendment that are part of the Modified Project. The Modified Project would not alter any existing roadways and would provide adequate driveway widths, and road clearances around structures consistent with local and State requirements to ensure adequate emergency access. Thus, the Modified Project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. Therefore, the Modified Project would not result in new or increased significant impacts beyond those identified in the Certified EIR.

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

The Project Site is located in an urban area that is not subject to wildland fires. Thus, the Modified Project would not expose people or structures either directly or indirectly to a significant risk of loss, injury or death involving wildland fires. Therefore, the Modified Project would not result in new or increased significant impacts beyond those identified in the Certified EIR.

3.9.3 Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

No. As discussed above, the Modified Project would not result in any new or more severe significant impacts beyond what were identified in the Certified EIR.

3.9.4 Any New Information Requiring New Analysis or Verification?

No. There is no new information requiring new analysis or verification.

3.9.5 EIR's Mitigation Measures Addressing Impact

None required.

3.9.6 Conclusion

As discussed above, the Modified Project would not result in any of the conditions set forth in PRC Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Supplemental or Subsequent EIR.

3.10 HYDROLOGY AND WATER QUALITY

Issues (and supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
HYDROLOGY AND WATER QUALITY: Would the project:					
(a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?	Less Than Significant	No	No	No	No
(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	No	No	No	No
(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:					
(i) Result in substantial erosion or siltation on- or off-site?	Less Than Significant	No	No	No	No
(ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	Less Than Significant	No	No	No	No
(iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	Less Than Significant	No	No	No	No
(iv) Impede or redirect flood flows?	Less Than Significant	No	No	No	No
(d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	Less Than Significant	No	No	No	No
(e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	Less Than Significant	No	No	No	No

Impacts related to hydrology and water quality are discussed in the Certified EIR on pages 3.9-1 through 3.9-28.

3.10.1 Impact Determination in the EIR

(a) Would the Project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?

As discussed in the Certified EIR, the General Plan Update would have a significant environmental impact if it would result in the violation of water quality standards and waste discharge requirements set out in Municipal Permit Order No. R4-2012-0175, NPDES Permit CAS004001, issued by the Los Angeles RWQCB. Violation of these permits could occur if the development anticipated in the General Plan Update would substantially increase pollutant loading levels in the sanitary sewer system or in groundwater underlying the City, either directly through the introduction of pollutants generated by industrial land uses, or indirectly through stormwater pollution. As NPDES Permit CAS004001 is based on the federal Clean Water Act, compliance with the Porter-Cologne Water Quality Control Act (Division 7 of the Water Code, commencing with Section 13000), applicable federal and state regulations, all applicable provisions of statewide water quality control plans and policies adopted by the SWRCB, the Basin Plan adopted by the RWQCB, the California Toxics Rule, the California Toxics Rule Implementation Plan, and NPDES would ensure compliance with other applicable plans and regulations pertaining to water quality.

While the City is largely built out, potential development and redevelopment under the General Plan Update could increase the area of impervious surfaces within the City and thus could increase the amount of runoff and associated pollutants during both construction and operation. However, all construction activity within the City that has the potential to negatively affect water quality is required to comply with the MS4 Permit. In addition, the City's Runoff Pollution Control Ordinances would further protect water quality in the City. Implementation of practices required by the MS4 Permit and local ordinances would reduce the volume of runoff from impervious surfaces and increase the amount of natural filtration of pollutants from stormwater occurring on site, generally improving the quality of stormwater before it enters the City's and/or county's stormwater system.

Finally, the General Plan Update contains policies on pages 3.9-21 and 3.9-22 of the Certified EIR that require the City to support RWQCB regulations and standards, ensure that individual developments incorporate BMPs, prepare and implement applicable water quality plans, coordinate with federal, state, and local agencies to monitor industrial discharges, adopt a master plan for the Dominguez Channel to improve water quality, and, where feasible, support the restoration and rehabilitation of channelized waterways and promote naturalized drainage channels. Overall, the General Plan's policies would promote improved water quality in the City and continued compliance with federal, state, and local water quality regulations, and would ensure that water quality is protected to the maximum extent practicable.

The Certified EIR concluded that for the reasons stated above, the General Plan Update would not violate any water quality standards or waste discharge requirements or

otherwise substantially degrade water quality, and this impact is considered less than significant.

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

As discussed in the Certified EIR, a small portion of the City's potable water supply relies on groundwater. However, the groundwater basins serving the City are adjudicated, and thus have limits on the amount of groundwater that is pumped for potable use. Therefore, the potential for overdraft is limited. With respect to groundwater recharge, as the City is largely built out and primarily consists of impervious surfaces, implementation of the General Plan Update would not result in substantial increases of impervious surfaces such that groundwater recharge would be hindered. Additionally, groundwater recharge basins for the Central Basin are in the Rio Hondo and San Gabriel Coastal Spreading Grounds along the Rio Hondo and the San Gabriel Rivers, and groundwater recharge for the West Coast Basin is primarily done through injection wells. Therefore, replenishment of groundwater is not reliant on natural recharge or percolation within the City. The Certified EIR concluded that for these reasons, the impact of the General Plan Update with respect to the depletion of groundwater supplies or interference with groundwater recharge would be less than significant.

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

(c.ii) Would the Project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

(c.iii) Would the Project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would 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?

(c.iv) Would the Project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would impede or redirect flood flows?

Questions (c.i) through (c.iv) were addressed together in the Certified EIR.

As discussed in the Certified EIR, implementation of the General Plan Update would not involve the direct alteration of existing streams, rivers, or other drainage patterns. However, potential future development or redevelopment allowed under the General Plan Update could impact the existing drainage system. While the City is largely built out, potential development and redevelopment under the General Plan Update could increase the area of impervious surfaces within the City and thus could increase runoff from these sites into the local storm drains in the City. This increase in runoff volumes could in turn result in hydromodification effects—such as erosion, siltation, and flooding—on the hydrological systems within the City, which occur when rainfall runoff is increased from impervious areas above the natural rainfall rate that would otherwise occur.

The City recognizes the importance of water quality and preventing hydromodification. Any development that would occur under the General Plan Update would be subject to the City's Floodplain Management and Stormwater and Urban Runoff Pollution Control Ordinances that help prevent flood damage resulting from hydromodification. Adherence to the City's ordinances would limit surface runoff from development under the General Plan Update, reducing siltation and erosion. In addition, the General Plan Update includes policies on page 3.9-24 of the Certified EIR that seek to reduce localized flooding and ensure that areas experiencing localized flooding problems are targeted for storm drain improvements. The Certified EIR concluded that for these reasons, the impact of the General Plan Update with respect to the alteration of drainage patterns would be less than significant.

(d) Would the Project in flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

As discussed in the Certified EIR, the City is located approximately six miles inland from the Pacific Ocean and two miles inland from the Los Angeles/Long Beach Harbor area. The City is not located in a tsunami inundation hazard area and there are no enclosed large water bodies within the City with potential for seiche effects or waves generated by failure of retaining structures. In addition, a vast majority of the City is outside of the flood hazard zone. Finally, development anticipated in the General Plan Update would comply with the City's existing regulations pertaining to flooding hazards and adhere to the General Plan policies listed on page 3.9-24 of the Certified EIR addressing flooding. Therefore, the Certified EIR concluded that the impact of the General Plan Update with respect to flood hazard zones would be less than significant.

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

As discussed in the Certified EIR, development anticipated by the General Plan Update could potentially degrade water quality. However, development would be subject to the RWQCB requirements and the Carson Municipal Code. Furthermore, the General Plan Update contains policies on pages 3.9-21 and 3.9-22 of the Certified EIR pertaining to water quality,. Overall, the General Plan's policies would promote improved water quality

in the City and continued compliance with federal, state, and local water quality regulations, and would ensure that water quality is protected to the maximum extent practicable. Adjudicated basins are not required to prepare Groundwater Sustainability Plans (GSPs) but are required to submit annual basin reports to fulfill Sustainable Groundwater Management Act (SGMA) requirements. As a result, no GSP has been prepared for either the West Coast or Central Basins. Therefore, the Certified EIR concluded that the impact of the General Plan Update with respect to a conflict with a water quality control plan or a GSP would be less than significant.

3.10.2 Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

(a) Would the Project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?

The Modified Project would be required to comply with the water quality regulations discussed above, which would ensure the Modified Project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality. Therefore, the Modified Project would not result in new or increased significant impacts beyond those identified in the Certified EIR.

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

In its existing condition, the Project Site is undeveloped. During storm events, water is either absorbed into the upper levels of the soil at the site and/or flows across the site to the local storm drain. As discussed in the Certified EIR, as the City is largely built out and primarily consists of impervious surfaces, implementation of the General Plan Update (including implementation of the Project) would not result in substantial increases of impervious surfaces such that groundwater recharge would be hindered. Additionally, groundwater recharge basins for the Central Basin are in the Rio Hondo and San Gabriel Coastal Spreading Grounds along the Rio Hondo and the San Gabriel Rivers, and groundwater recharge for the West Coast Basin is primarily done through injection wells. Thus, the Modified Project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin. Therefore, the Modified Project would not result in new or increased significant impacts beyond those identified in the Certified EIR.

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

(c.ii) Would the Project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

(c.iii) Would the Project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would 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?

(c.iv) Would the Project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would impede or redirect flood flows?

As with the Certified EIR, questions (c.i) through (c.iv) are addressed together.

In its existing condition, the Project Site is undeveloped. During storm events, water is either absorbed into the upper levels of the soil at the site and/or flows across the site to the local storm drain. It is possible that current water quality measures are not being implemented at the site. During both the Modified Project's construction and operational phases, the Modified Project would be required to comply with NPDES permit requirements, the City's Floodplain Management and Stormwater and Urban Runoff Pollution Control Ordinances, and the City's hydrology requirements, which prevent soil erosion and loss of topsoil, protect water quality, and control runoff rates and volumes to ensure that the existing storm drain capacity can accommodate the Project's runoff. It is likely that the Project would reduce the potential for erosion to occur at the Project Site and would improve the quality of water leaving the site. Thus, the Modified Project would not substantially alter the existing drainage pattern of the site or area that would cause flooding, exceed storm drain capacity, or redirect flood flows. Therefore, the Modified Project would not result in new or increased significant impacts beyond those identified in the Certified EIR.

(d) Would the Project result in flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

The Project Site is not located near any large bodies of water. Thus, the Modified Project would not result in flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation. Therefore, the Modified Project would not result in new or increased significant impacts beyond those identified in the Certified EIR.

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

In its existing condition, the Project Site is undeveloped. During storm events, water is either absorbed into the upper levels of the soil at the site and/or flows across the site to the local storm drain. It is possible that current water quality measures are not being implemented at the site. During both the Modified Project's construction and operational phases, the Modified Project would be required to comply with NPDES permit requirements and the City's Floodplain Management and Stormwater and Urban Runoff Pollution Control Ordinances, which prevent soil erosion and loss of topsoil and protect water quality. As explained previously, the Project Site is not a significant source of groundwater recharge. Thus, the Modified Project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. Therefore, the Modified Project would not result in new or increased significant impacts beyond those identified in the Certified EIR.

3.10.3 Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

No. As discussed above, the Modified Project would not result in any new or more severe significant impacts beyond what were identified in the Certified EIR.

3.10.4 Any New Information Requiring New Analysis or Verification?

No. There is no new information requiring new analysis or verification.

3.10.5 EIR's Mitigation Measures Addressing Impact

None required.

3.10.6 Conclusion

As discussed above, the Modified Project would not result in any of the conditions set forth in PRC Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Supplemental or Subsequent EIR.

3.11 LAND USE AND PLANNING

Issues (and supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
LAND USE AND PLANNING: Would the project:					
(a) Physically divide an established community?	Less Than Significant	No	No	No	No
(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	No	No	No	No

Impacts related to land use and planning are discussed in the Certified EIR on pages 3.10-1 through 3.10-18.

3.11.1 Impact Determination in the EIR

(a) Would the Project physically divide an established community?

As discussed in the Certified EIR, the General Plan Update would improve connectivity and land use consistency within and between existing neighborhoods, thereby providing more linkages within the City and the region. The General Plan outlines strategies for greater integration of uses in different parts of the City and a better connection between employment and residential uses, with more areas designated for mixed-use development. It recognizes the physical elements that help define the character of Carson, including existing residential neighborhoods, downtown Core, industrial/business centers, and corridors. This structure helps establish a clear multi-modal network throughout the City by focusing on both community destinations as well as the efficiency, safety, and convenience of the modes of transportation in between. Higher densities, especially in mixed-use designations, increase capacity for residential development near community-serving commercial, retail, and office uses as well as schools, parks, and recreational facilities, and proposed improvements to the bicycle, pedestrian, and road networks will make it easier for residents to travel throughout the community. Furthermore, changes to land use designations under the General Plan Update would consolidate designations to better reflect existing land uses and would not result in the division of any established community. Therefore, the Certified EIR concluded that future development allowed by the General Plan Update would not physically divide an established community, and the impact is less than significant.

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

As discussed in the Certified EIR, the General Plan Update's policies and land use designations for future development and would replace the 2004 General Plan. Existing regulations would be updated as needed to be consistent with the updated General Plan and/or effectively implement the General Plan Update, if it were adopted Additionally, the City's Zoning Ordinance would be revised to implement the General Plan Update, as required by state law (Government Code Section 65860[a]), and it would translate the General Plan policies into specific use regulations, development standards, and performance criteria to govern development on individual properties. The Zoning Ordinance ultimately prescribes standards, rules, and procedures for development, while the Zoning Map will provide more detail than the General Plan Land Use Diagram. The General Plan Update includes multiple policies from the 2004 General Plan and proposes more stringent policies for the purpose of avoiding or mitigating an environmental effect.

The City has adopted specific plans to tailor appropriate development standards and policies to individual neighborhoods. By state law, specific plans must be consistent with the General Plan. As of 2021, development under the specific plans is still underway. However, the General Plan Update takes these plans into consideration such that changes to land use designations within the boundaries of various specific plans, as well as throughout the City, will continue to be harmonious and consistent with existing land uses. For example, Development District 3 of the District at South Bay Specific Plan Area (north of Del Amo Boulevard) has been developed with 300 residential units on the 11-acre parcel; the changes the land use designation of this parcel from "Mixed Use – Residential" to "High Density Residential" to reflect the new use more accurately. Likewise, the Dominguez Technology Center Phase One Specific Plan Area (on the northwest corner of East University Drive and South Wilmington Avenue) is "Flex District" in place of "Light Industrial" to reflect existing office uses at that location. As such, redesignation under the General Plan Update is designed to increase consistency with existing uses following completion of development under these specific plans and would not result in any conflicts. General Plan policies would not conflict with policies included in these specific plans adopted for the purpose of avoiding or mitigating an environmental effect.

The City of Carson Planning Division has primary responsibility for administering the laws, regulations, and requirements that pertain to the physical development of the City. Specific duties relating to implementation of the General Plan Update would include preparing zoning and subdivision ordinance amendments, reviewing development applications, conducting investigations and making reports and recommendations on planning and land use, zoning, subdivisions, development plans, and environmental regulations.

The General Plan Update also must be consistent with regional and local plans. Policies within the General Plan Update integrate land use, housing, and transportation planning to achieve regional GHG emission reductions by promoting compact, infill, and mixed-use development, therefore supporting the Sustainable Communities Strategy (Connect SoCal). Moreover, General Plan policies encourage remediation and redevelopment of brownfield sites, improving the environmental quality of lands in the Planning Area. Additionally, the General Plan Update seeks to maintain consistency with the policies of the Los Angeles County General Plan and the Code of Ordinances. The General Plan Update designates the lands within the SOI as Light Industrial, Heavy Industrial, Low Density Residential, High Density Residential, Utilities, and Corridor Mixed Use. Light Industrial, Heavy Industrial, Utilities, and Low Density Residential designations are consistent with existing County zoning designations in these areas. Places that are designated as High Density Residential or Corridor Mixed Use—located at the intersection of Redondo Beach and Avalon boulevards as well as along Del Amo Boulevard at Wilmington and Santa Fe avenues—reflect existing on-the-ground uses, including neighborhood commercial/retail and multifamily residential units, and have been "pre-zoned" to be consistent with the General Plan Update in the event that these areas of the SOI are annexed into City limits. Unless these lands are annexed, County land use designations and zoning apply.

The Certified EIR concluded that given that the General Plan Update does not conflict with any other agencies' applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect, conflicts with existing local and regional plans and the Zoning Ordinance are expected to have a less than significant impact.

3.11.2 Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

(a) Would the Project physically divide an established community?

The Project Site is located in a well-established, urban area and is currently undeveloped. The Modified Project includes development of an infill site with 62 residential dwelling units, allowed under the existing zoning and land use designation for the site, as amended by the General Plan Amendment and Specific Plan Amendment that are part of the Modified Project. The Modified Project would not include development outside of the established boundaries of the Project Site. Thus, the Modified Project would not physically divide an established community. Therefore, the Modified Project would not result in new or increased significant impacts beyond those identified in the Certified EIR.

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

The Project Site is located in a well-established, urban area and is currently undeveloped. The Modified Project includes development of an infill site with 62 residential dwelling

units, allowed under the existing zoning and land use designation for the site, as amended by the General Plan Amendment and Specific Plan Amendment that are part of the Modified Project. The Modified Project would be consistent with all applicable General Plan policies. Thus, the Modified Project would not 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. Therefore, the Modified Project would not result in new or increased significant impacts beyond those identified in the Certified EIR.

3.11.3 Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

No. As discussed above, the Modified Project would not result in any new or more severe significant impacts beyond what were identified in the Certified EIR.

3.11.4 Any New Information Requiring New Analysis or Verification?

No. There is no new information requiring new analysis or verification.

3.11.5 EIR's Mitigation Measures Addressing Impact

None required.

3.11.6 Conclusion

As discussed above, the Modified Project would not result in any of the conditions set forth in PRC Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Supplemental or Subsequent EIR.

3.12 MINERAL RESOURCES

Issues (and supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
MINERAL RESOURCES: Would the project:					
(a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	No Impact	No	No	No	No
(b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on local general plan, specific plan or other land use plan?	No Impact	No	No	No	No

Impacts related to mineral resources are discussed in the Certified EIR on page 5-3.

3.12.1 Impact Determination in the EIR

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

As discussed in the Certified EIR, portions of the City are located within the Dominguez and Wilmington Oil Fields. As a result, there are large areas of the City devoted to the management and production of oil and petroleum products. The General Plan Update would focus development in the City's Central Core and would not otherwise affect heavy industrial areas in the City which are dedicated to oil and petroleum production. The Certified EIR concluded that no impacts would occur.

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

As in the Certified EIR, there are large areas of the City devoted to the management and production of oil and petroleum products. However, implementation of the General Plan Update would not affect areas which are dedicated to oil and petroleum production. The Certified EIR concluded that no impacts would occur.

3.12.2 Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

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

The Project Site is not located in the area of the City with oil production. Thus, the Modified Project would not 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. Therefore, the Modified Project would not result in new or increased significant impacts beyond those identified in the Certified EIR.

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

The Project Site is not located in the area of the City with oil production. Thus, the Modified Project would not result in the loss of availability of a locally-important mineral resource recovery site delineated on local general plan, specific plan or other land use plan. Therefore, the Modified Project would not result in new or increased significant impacts beyond those identified in the Certified EIR.

3.12.3 Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

No. As discussed above, the Modified Project would not result in any new or more severe significant impacts beyond what were identified in the Certified EIR.

3.12.4 Any New Information Requiring New Analysis or Verification?

No. There is no new information requiring new analysis or verification.

3.12.5 EIR's Mitigation Measures Addressing Impact

None required.

3.12.6 Conclusion

As discussed above, the Modified Project would not result in any of the conditions set forth in PRC Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Supplemental or Subsequent EIR.

3.13 NOISE

Issues (and supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
NOISE: Would the project result in:					
(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	No	No	No	No
(b) Generation of excessive groundborne vibration or groundborne noise levels?	Less Than Significant	No	No	No	No
(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	No	No	No	No

Impacts related to noise are discussed in the Certified EIR on pages 3.11-1 through 3.11-42.

3.13.1 Impact Determination in the EIR

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

Construction Noise

As discussed in the Certified EIR, construction of future development under the General Plan Update would require the use of heavy equipment during the demolition, grading, excavation, and other construction activities within the Planning Area. During each stage of development for any given construction project, a different mix of equipment would be used. As such, construction activity noise levels would fluctuate depending on the particular type, number, and duration of use of the various pieces of construction equipment. Individual pieces of construction equipment expected to be used during construction could produce maximum noise levels of 75 dBA to 101 dBA Lmax at a reference distance of 50 feet from the noise source. These maximum noise levels would occur when equipment is operating at full power.

The exact locations of future projects and construction that would be implemented under the General Plan Update are not known at this time, though it is assumed that some of the activities would take place in close proximity to sensitive receptors given that the Planning Area includes a wide range of receptors. The severity of construction-related noise impacts depends on the proximity of construction activities to sensitive receptors, the presence of intervening barriers, the number and types of equipment used, and the duration of the activity. While the details of these factors are not available for future projects under the General Plan Update, it is assumed that individual projects would be implemented in compliance with the City standards. Future development under the General Plan Update would be required to comply with the restrictions of the Carson Municipal Code. In addition, future development under the General Plan Update would be required to conduct their own CEQA analysis and would determine significance based on the individual project specifics. Through each project's individual environmental review process, potential impacts would be identified and compared against relevant thresholds. Individual projects that exceed the thresholds would normally result in a potentially significant impact and require mitigation. Therefore, the Certified EIR concluded the impact from construction noise would be less than significant.

Traffic Noise

As discussed in the Certified EIR, future development under the General Plan Update would generate traffic that would increase noise levels along existing and future roadways. The FHWA's FHWA-TNM was used to evaluate future traffic-related noise conditions in the City and SOI at the study intersections. The model calculates the average noise level at specific locations based on traffic volumes, average speeds, and site environmental conditions. Traffic noise along the analyzed roadway segments would not be discernably different when existing noise levels are compared to future roadway noise levels with implementation of the General Plan Update. The maximum increase would 2.5 dBA be along Figueroa Street between Victoria Street and Del Amo Boulevard. A 3 dBA increase in noise levels is considered barely perceivable by the human ear. Therefore, the impact from traffic noise would be less than significant.

Railway Noise

As discussed in the Certified EIR, there are railroad tracks along the eastern portion of the City, generally following Alameda Street and are used primarily for the transport of cargo containers from the Ports of Los Angeles and Long Beach to inland warehouses or to out of state destinations. The residential neighborhood of Lincoln Village in the southeastern corner of the City is impacted by the train noise along these railroad tracks. Freight trains usually generate higher noise levels than passenger trains, but do not operate on a fixed schedule. New or renovated noise-sensitive uses in the Lincoln Village area would be required to evaluate potential train noise level at the site. Mitigation measures designed to meet the exterior and/or interior noise standards shall be identified and implemented. Therefore, the Certified EIR concluded that the impact from railway noise would be less than significant.

Stationary Noise

As discussed in the Certified EIR, future development under the General Plan Update could expose existing and new sensitive receptors to stationary noise sources, such as, rooftop heating, ventilation, and air conditioning units. In addition, growth anticipated under the General Plan Update could expose existing and new sensitive receptors to stationary noise sources associated with industrial uses. Any new development under the General Plan Update would be subject to the Carson Municipal Code noise control ordinance and to the General Plan policies listed on pages 3.11-31 through 3.11-34 of the Certified EIR aimed at reducing noise levels from adjacent properties. The Certified EIR concluded that through compliance with the Carson Municipal Code noise control ordinance and General Plan policies, the impact from stationary noise would be less than significant.

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

Construction

Human Annoyance

As discussed in the Certified EIR, the use of large bulldozers and loaded trucks for construction would generate the highest groundborne vibration levels on a typical construction site. Large bulldozers and loaded trucks would generate 87 VdB and 86 Vdb, respectively, at a reference distance of 25 feet. These levels would exceed the FTA's 78 VdB threshold at the nearest noise-sensitive receiver locations during daytime hours or the FTA's 84 VdB threshold for annoyance of occupants in residential buildings.

The exact locations of future projects and construction that would be implemented under the General Plan Update are not known at this time. The severity of construction-related vibration impacts depends on the proximity of construction activities to adjacent structures and the types of equipment used. While the details of these factors are not available for future projects under the General Plan Update, it is assumed that individual projects would be implemented in compliance with applicable standards. In addition, future development under the General Plan Update would be required to conduct their own CEQA analysis and would determine significance based on the individual project specifics. Through each project's individual environmental review process, potential impacts would be identified and compared against relevant thresholds. Individual projects that exceed the thresholds would normally be considered significant and require mitigation. Therefore, the impact of vibration with respect to human annoyance would be less than significant.

Building Damage

As discussed in the Certified EIR, the use of large bulldozers and loaded trucks for construction would generate the highest groundborne vibration levels on a typical construction site. According to the FTA, large bulldozers and loaded trucks would

generate 0.089 in/sec PPV and 0.076 in/sec PPV, respectively, at a reference distance of 25 feet. Construction activities such as the use of a large bulldozer, would be required to not operate The exact locations of future projects and construction that would be implemented under the General Plan Update are not known at this time. The severity of construction-related vibration impacts depends on the proximity of construction activities to adjacent structures and the types of equipment used. While the details of these factors are not available for future projects under the General Plan Update, it is assumed that individual projects would be implemented in compliance with applicable standards. In addition, future development under the General Plan Update would be required to conduct their own CEQA analysis and would determine significance based on the individual project specifics. Through each project's individual environmental review process, potential impacts would be identified and compared against relevant thresholds. Individual projects that exceed the thresholds would normally be considered significant and require mitigation. Therefore, the Certified EIR concluded that the impact of vibration to buildings during construction would be less than significant.

Traffic

As discussed in the Certified EIR, Vehicular traffic would generate groundborne vibration and under the General Plan Update, more land development would leave to more traffic volume. However, the vibration from vehicles is temporary and intermittent and generates up to 61 Vdb or 0.005 in/sec PPV. The vibration levels from traffic would be well below the thresholds for structural damage. Therefore, the Certified EIR concluded that the impact to sensitive receptors and buildings from vibration generated by traffic would be less than significant.

Railway

As discussed in the Certified EIR, The operation of freight trains along the Alameda corridor currently generates vibration. The General Plan Update would not change the levels of vibration along this line. All future development in the vicinity of the Alameda corridor would be subject to the noise screening distances found in the Federal Railroad Administration (FRA) High-Speed Ground Transportation Noise and Vibration Manual. The screening distance for railroad corridor rail mainline is 300 feet for mechanical/structural sources and 700 feet for aerodynamic sources with steel-wheeled trains and 200 feet for mechanical/structural sources and 300 feet for aerodynamic sources with intervening buildings. At these distances, vibration levels would attenuate rapidly and any new developments would not be affected. Therefore, the Certified EIR concluded that the impact to sensitive receptors and buildings from vibration generated by rail traffic would be less than significant.

(c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public

airport or public use airport, would the Project expose people residing or working in the project area to excessive noise levels?

As discussed in the Certified EIR, the City is not located within the vicinity of a private airstrip or airport land use plan, or where such a plan has not been adopted, is not located within two miles of a public airport or public use airport. The Compton Airport is located approximately one-half mile to the northwest of the City while the Long Beach International and Los Angles International airports are located approximately 13 miles and 12.7 miles to the southeast and the northwest of the City, respectively. The City is affected by the overflight of airplanes from these airports but is not within the 60 dBA CNEL of any of these airports. Therefore, the Certified EIR concluded that implementation of the General Plan Update would not expose people residing or working in the project area to excessive noise levels, and thus this impact would be less than significant.

3.13.2 Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

(a) Would the Project result in the 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?

The Project Site is located in an urban area and is currently undeveloped. The Modified Project includes development of an infill site with 62 residential dwelling units, allowed under the existing zoning and land use designation for the site, as amended by the General Plan Amendment and Specific Plan Amendment that are part of the Modified Project. The Modified Project's construction and operational activities would generate noise. Consistent with the requirements of the Certified EIR, a noise impact analysis was conducted for the Modified Project (refer to Attachment E), summarized below.

Construction

Construction would generate noise during the construction process that would span 16 months of site preparation, grading, utilities trenching, building construction, paving, and application of architectural coatings. During all construction phases, noise-generating activities could occur at the Project Site between 7:00 A.M. and 8:00 P.M. Monday through Friday. On Saturdays, construction would be permitted to occur between 8:00 A.M. and 7:00 P.M.

As shown in Table 8, the use of multiple pieces of powered equipment simultaneously would elevate ambient noise at the analyzed sensitive receptors. However, these construction noise levels would not exceed the City's significance threshold of 5 dBA. Therefore, the Project's on-site construction noise impact would be less than significant.

Table 8
Construction Noise Impacts at Off-Site Sensitive Receptors

Receptor	Maximum Construction Noise Level (dBA L_{eq})	Existing Ambient Noise Level (dBA L_{eq})	New Ambient Noise Level (dBA L_{eq})	Increase (dBA L_{eq})	Potentially Significant?
1. Residences – 215th Pl.	54.2	57.2	59.0	1.8	No
2. Perry Street Mini-Park	51.4	57.2	58.2	1.0	No
3. Residences – Perry St.	58.7	57.2	61.0	3.8	No
4. Residences – Carson St.	45.8	67.9	67.9	0.0	No
5. Residences – Edgar St.	29.0	70.1	70.1	0.0	No
Source: DKA Planning, 2024.					

The Project would also generate noise at off-site locations from haul trucks moving debris and soil from the Project Site during demolition and grading activities, respectively; vendor trips; and worker commute trips. These activities would generate up to an estimated 69 peak-hour passenger-car-equivalent (PCE) trips, as summarized in Table 9, during the building construction phase. This would represent about 3.6 percent of traffic volumes on Carson Street, which carries about 1,851 vehicles at the San Diego Freeway on-ramps in the morning peak hour of traffic. Because workers and vendors will likely use more than one route to travel to and from the Project Site, this conservative assessment of traffic volumes likely overstates traffic volumes from construction activities on this roadway.

Carson Street would serve as part of the haul route for debris and soil imported and exported, respectively, from the Project Site given its direct access to the San Diego Freeway. Because the Project's construction-related trips would not cause a doubling in traffic volumes (i.e., 100 percent increase) on Carson Street, the Project's construction-related traffic would not increase existing noise levels by 3 dBA or more, let alone the 5 dBA threshold of significance for off-site construction noise activities. Therefore, the Project's noise impacts from construction-related traffic would be less than significant.

Table 9
Construction Vehicle Trips (Maximum Hourly)

Construction Phase	Worker Trips [a]	Vendor Trips	Haul Trips	Total Trips	Percent of Peak A.M. Hour Trips on Carson St.[d]
Site Preparation	8	0	0	8	0.4
Grading	10	0	40[b]	50	2.7
Trenching	3	0	0	3	0.1
Building Construction	47	25[c]	0	69	3.8
Paving	15	0	0	15	0.8
Architectural Coating	9	0	0	9	0.5

[a] *Assumes all worker trips occur in the peak hour of construction activity.*
[b] *The project would generate 656 haul trips over a 45-day period with seven-hour workdays. Because haul trucks emit more noise than passenger vehicles, a 19.1 passenger car equivalency (PCE) was used to convert haul truck trips to a passenger car equivalent*
[c] *This phase would generate about 6.6 vendor truck trips daily over a seven-hour workday. Assumes a blend of medium- and heavy-duty vehicle types and a 13.1 PCE.*
[d] *Percent of existing traffic volumes on Carson Street at San Diego Freeway on-ramp.*

Source: DKA Planning, 2024. Refer to Attachment E.

Operation

As discussed below, the Project would not result in an exposure of persons to or a generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. The Project would also not increase surrounding noise levels by more than 5 dBA CNEL, the minimum threshold of significance based on the noise/land use category of sensitive receptors near the Project Site. As a result, the Project's on-site operational noise impacts would be considered less than significant.

Mechanical Equipment

The Project would include outdoor mechanical equipment for cooling for each residence on the ground level. This could include air conditioners that operate during cooling cycles that would include a number of sound sources, including compressors, condenser fans, supply fans, return fans, and exhaust fans. These units could be rated to generate a sound power between 51 and 76 dBA. Any off-site sensitive receptors would not experience elevated noise levels without a direct line-of-sight to these units. Given their location near each residence, any sound path from these units would likely be attenuated by the presence of the residences and structures in the development, as well as the distance to off-site receptors. In addition, these residences at the north of the Project Site

do not have a line of sight to sensitive receptors in any direction. As a result, noise from HVAC units would negligibly elevate ambient noise levels, far less than the 5 dBA CNEL threshold of significance for operational impacts.

Pad-mounted oil transformers that lower high voltage to standard household voltage used to power electronics, appliances and lighting would be located on the ground level in unobstructed locations. These transformers would be housed in a steel cabinet and generally would not involve pumps, though fans may be needed on some units. Switchgear responsible for distributing power through the development could be located externally, though no mechanical processes that generate noise would be necessary. Otherwise, all other mechanical equipment would be fully enclosed within each of the Project's structures. All these activities would generally occur within the envelope of the development, operational noise would be shielded from off-site noise-sensitive receptors.

Parking-Related Activities

The majority of parking-related noise impacts at the Project Site would come from vehicles entering and exiting the residential development from a driveway off Perry Street. These vehicles would generate incremental noise from tire friction as they navigate to and from garage spaces or open-air visitor spaces.

Parking-related noise would include door slamming (generally instantaneous) and car alarms, while could last a few seconds. These activities would be within an enclosed garage structure and as such, shielded largely from nearby sensitive receptors. Any noise from outdoor parking spaces within the interior of the development would be shielded by the residential buildings that flank Perry Street and the northern property line. Therefore, the Project's parking garage activities would not have a significant impact on the surrounding noise environment.

Outdoor Uses

- Trash collection. On-site trash and recyclable materials for the residents would be managed from each residential building. Bins would be moved to the street and/or driveways manually. Haul trucks would access solid waste from the Perry Street driveway, where solid waste activities would include use of trash compactors and hydraulics associated with the refuse trucks themselves. Noise levels of approximately 71 dBA L_{eq} and 66 dBA L_{eq} could be generated by collection trucks and trash compactors, respectively, at 50 feet of distance. Because CNEL levels represent the energy average of sound levels during a 24-hour period, the modest sound power from intermittent solid waste collection during daytime hours would negligibly affect CNEL sound levels.

- Landscape maintenance. Noise from gas-powered leaf blowers, lawnmowers, and other landscape equipment can generated substantial bursts of noise during regular maintenance. For example, two gas powered leaf blowers with two-stroke engines and a hose vacuum can generate an average of 85.5 dBA

L_{eq} and cause nuisance or potential noise impacts for nearby receptors. The landscape plan focuses on a modest palette of accent trees and raised planters that will minimize the need for powered landscaping equipment, as some of this can be managed by hand. Because CNEL levels represent the energy average of sound levels during a 24-hour period, the modest sound power from a few minutes of maintenance activities during daytime hours would negligibly affect CNEL sound levels.

The majority of the Project's operational noise impacts would be off-site from vehicles traveling to and from the development. The Project could add 2,350 vehicle trips to the local roadway network on weekdays when the development could be operational in 2026. During the P.M. peak hour, up to 185 vehicles would generate noise entering or exiting the development, with up to 158 vehicles in the A.M. peak hour. This would represent a small addition to traffic volumes on local roadways. For example, it would represent 7.9 percent of the 29,718 average daily vehicles that used Avalon Boulevard at Carson Street in 2018.

Because it takes a doubling of traffic volumes (i.e., 100 percent) to increase ambient noise levels by 3 dBA L_{eq}, the Project's traffic would neither increase ambient noise levels 3 dBA or more into "normally unacceptable" or "clearly unacceptable" noise/land use compatibility categories, nor increase ambient noise levels 5 dBA or more. Twenty-four-hour CNEL impacts would similarly be minimal, far below criterion for significant operational noise impacts, which begin at 3 dBA. As such, this impact would be considered less than significant.

Conclusion

As demonstrated above and in Attachment E, the Modified Project would not result in the 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. Therefore, the Modified Project would not result in new or increased significant impacts beyond those identified in the Certified EIR.

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

The Project Site is located in an urban area and is currently undeveloped. The Modified Project includes development of an infill site with 62 residential dwelling units, allowed under the existing zoning and land use designation for the site, as amended by the General Plan Amendment and Specific Plan Amendment that are part of the Modified Project. The Modified Project's construction activities would generate groundborne vibration. (As a residential development, the Modified Project's operation activities would not generate groundborne vibration.) Consistent with the Certified EIR, a groundborne vibration impact analysis was prepared for the Modified Project (refer to Attachment F), summarized below.

Construction

Groundborne vibration would be generated by the Project at the Project Site. As a result of equipment that could include on-site bulldozer operations or the vibrational equivalent, as shown in Table 10, vibration velocities of up to 0.089 inches per second PPV are projected to occur at the nearest structures. This impact is below the 0.20 in/sec PPV thresholds of significance for Category III structures. Other potential construction activities would produce less vibration and have lesser potential impacts on nearby sensitive receptors. As a result, construction-related structural vibration impacts would be less than significant.

Table 10
Building Damage Vibration Levels – On-Site Sources

Off-Site Receptor Location	Distance to Project Site (feet)	Vibration Velocity Levels at Off-Site Sensitive Receptors from Construction Equipment (in/sec PPV)					Significance Criterion (PPV)	Potentially Significant Impact?
		Large Bulldozer	Caisson Drilling	Loaded Trucks	Jack-hammer	Small Bulldozer		
FTA Reference Vibration Level (25 Feet)	N/A	0.089	0.089	0.076	0.035	0.003	--	--
Residences, 215th Pl.	25	0.089	0.089	0.076	0.035	0.003	0.20[a]	No
Residences - Perry Street.	80	0.016	0.016	0.013	0.006	0.001	0.20[a]	No

[a] *FTA criterion for Category III (non-engineered timber and masonry buildings)*

Source: DKA Planning, 2024. Refer to Attachment F.

Construction of the Project would generate trips from large trucks including haul trucks, concrete mixing trucks, concrete pumping trucks, and vendor delivery trucks. Regarding building damage, based on FTA data, the vibration generated by a typical heavy-duty truck would be approximately 63 VdB (0.006 PPV) at a distance of 50 feet from the truck. According to the FTA "[i]t is unusual for vibration from sources such as buses and trucks to be perceptible, even in locations close to major roads." Nonetheless, there are buildings along the Project's anticipated haul route on Carson Street that are situated away from the right-of-way and would be exposed to groundborne vibration levels of approximately 0.006 PPV. This estimated vibration generated by construction trucks traveling along the anticipated haul route would be well below the most stringent building damage criteria of 0.12 PPV for buildings extremely susceptible to vibration. The Project's potential to damage roadside buildings and structures as the result of groundborne vibration generated by its truck trips would therefore be less than significant.

Operation

During operation of the mixed-use residential and commercial development, there would be no significant stationary sources of groundborne vibration, such as heavy equipment or industrial operations. Operational groundborne vibration in the Project Site's vicinity would be generated by its related vehicle travel on local roadways. However as previously

discussed, road vehicles rarely create vibration levels perceptible to humans unless road surfaces are poorly maintained and have potholes or bumps. As a result, the Project's long-term vibration impacts would be less than significant.

Conclusion

As demonstrated above and in Attachment F, the Modified Project would not result in any significant groundborne vibration impacts. Thus, the Modified Project would not result in the generation of excessive groundborne vibration or groundborne noise levels. Therefore, the Modified Project would not result in new or increased significant impacts beyond those identified in the Certified EIR.

(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?

The Project Site is not located in 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. Thus, the Modified Project would not expose people residing or working in the project area to excessive noise levels. Therefore, the Modified Project would not result in new or increased significant impacts beyond those identified in the Certified EIR.

3.13.3 Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

No. As discussed above, the Modified Project would not result in any new or more severe significant impacts beyond what were identified in the Certified EIR.

3.13.4 Any New Information Requiring New Analysis or Verification?

No. There is no new information requiring new analysis or verification.

3.13.5 EIR's Mitigation Measures Addressing Impact

None required.

3.13.6 Conclusion

As discussed above, the Modified Project would not result in any of the conditions set forth in PRC Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Supplemental or Subsequent EIR.

3.14 POPULATION AND HOUSING

Issues (and supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
POPULATION AND HOUSING: Would the project:					
(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	No	No	No	No
(b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	Less Than Significant	No	No	No	No

Impacts related to population and housing are discussed in the Certified EIR on pages 3.12-1 through 3.12-12.

3.14.1 Impact Determination in the EIR

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

As discussed in the Certified EIR, the City has a Regional Housing Needs Assessment (RHNA) obligation of 5,618 new units, which is a significant increase from previous RHNA allocations of previous housing cycles. Given that a housing cycle has a planning period of eight years, extrapolating this RHNA requirement to the General Plan Update's 2040 horizon would result in about 14,000 new units. Recognizing that market trends are difficult to predict, RHNA numbers are subject to change in the future, and growth is not a linear process, the General Plan Update very closely matches this value on an order of magnitude, with a potential buildout of 13,690 units between 2020 and 2040. New residential opportunities are a result of targeted residential density increases in new mixed-use designations along corridors and in the downtown Core area to provide higher density housing near jobs and community-serving retail and services. This type of infill development is designed to focus on redevelopment and revitalization of areas already served by infrastructure and would not require extensions of roads or other infrastructure. Additionally, policies of the General Plan Update seek to provide housing that meets the diverse needs of Carson's growing population while preserving existing neighborhoods, as well as ensure that public facilities, services, and infrastructure maintain a level of service that supports a high quality of life for all residents.

The General Plan Update is a long-range planning effort that was designed to accommodate regional growth requirements for the next 20 years. As such, the Certified EIR concluded that the General Plan Update would not induce substantial unplanned population growth, either directly or indirectly, and this impact is considered less than significant.

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

As discussed in the Certified EIR, a substantial portion (about 26 percent) of developed land in the Planning Area consists of single-family residential uses, which are not anticipated to undergo significant land use changes under the General Plan Update. The General Plan Update focuses infill development opportunities in vacant and underutilized areas in Carson, while seeking to preserve existing neighborhoods. Industrial uses make up the largest amount of land area within the Planning Area (about 47 percent). New land use classifications introduce greater flexibility of uses, such as mixed-use, and allow residential uses in more areas of the City, including many that are currently single uses. New mixed-use designations downtown and along key corridors also enable greater opportunities for future residential development. As such, the General Plan Update is projected to increase the overall number of dwelling units and provide additional housing opportunities to serve the diverse needs of the community at various socioeconomic levels.

Article 10.6 of the California Government Code outlines the state's Housing Element requirements. A housing element must analyze existing and projected housing needs, examine special housing needs within the population, evaluate the effectiveness of current goals and policies, identify governmental and other constraints, determine compliance with other housing laws, and identify opportunities to incorporate energy conservation into the housing stock. The element must also establish goals, policies, and programs to maintain, enhance, and develop housing. Though initially prepared as part of the General Plan Update, the City of Carson's 6th Cycle Housing Element has been separately adopted as of February 1, 2022. The Housing Element has been designed to be consistent with the General Plan Update and reflects the new land use designations that allow greater residential densities in order to meet the RHNA obligation for the 2021–2029 housing element cycle. In addition, the Housing Element includes an in-depth analysis of the City's housing stock, past and anticipated trends, and housing needs that inform the element's goals, policies, and programs, which include provisions to preserve, maintain, and rehabilitate existing housing, particularly affordable housing. The General Plan Update includes policies that support these objectives, including those that seek to ensure equity and protect diversity in Carson's communities.

The Certified EIR concluded that for these reasons, growth anticipated under the General Plan Update would not displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere, and this impact is less than significant.

3.14.2 Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

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

The Project Site is located in an urban area and is currently undeveloped. The Modified Project includes development of an infill site with 62 residential dwelling units, allowed under the existing zoning and land use designation for the site, as amended by the General Plan Amendment and Specific Plan Amendment that are part of the Modified Project. The Modified Project would help the City meet its RHNA obligation of 5,618 new housing units. The Modified Project does not include the development of any new roadways or utility infrastructure. Thus, the Modified Project would not 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). Therefore, the Modified Project would not result in new or increased significant impacts beyond those identified in the Certified EIR.

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

The Project Site is located in an urban area and is currently undeveloped. No housing is located on the site. Thus, the Modified Project would not displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere. Therefore, the Modified Project would not result in new or increased significant impacts beyond those identified in the Certified EIR.

3.14.3 Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

No. As discussed above, the Modified Project would not result in any new or more severe significant impacts beyond what were identified in the Certified EIR.

3.14.4 Any New Information Requiring New Analysis or Verification?

No. There is no new information requiring new analysis or verification.

3.14.5 EIR's Mitigation Measures Addressing Impact

None required.

3.14.6 Conclusion

As discussed above, the Modified Project would not result in any of the conditions set forth in PRC Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Supplemental or Subsequent EIR.

3.15 PUBLIC SERVICES

Issues (and supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
PUBLIC SERVICES: 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:					
(a) Fire protection?	Less Than Significant	No	No	No	No
(b) Police protection?	Less Than Significant	No	No	No	No
(c) Schools?	Less Than Significant	No	No	No	No
(d) Parks?	Less Than Significant	No	No	No	No
(e) Other public facilities?	Less Than Significant	No	No	No	No

Impacts related to public services are discussed in the Certified EIR on pages 3.13-1 through 3.13-14.

3.15.1 Impact Determination in the EIR

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

(a) Fire Protection?

As discussed in the Certified EIR, while the projected net service population increase of 43,600 residents by 2040 would likely increase the demand for emergency fire response and preventive services in the Planning Area, the increase in population would occur incrementally over the next 20 years. Moreover, the Planning Area is a predominantly urban area that is "built out," with limited land available for development, and General Plan policies promote infill and revitalization strategies that foster compact development patterns. As such, new growth will primarily occur within existing service areas. No new fire service facilities are included in the General Plan Update.

Existing City and County of Los Angeles policies would minimize calls for fire protection services. The Fire Prevention Code of the City adopts an amended version of the County's fire code, which itself constitutes an amended version of the California Fire Code. The City is a Local Responsibility Area (LRA) but does not contain any FHSZs, and most fire hazards in the Planning Area are characterized as urban fires. Policies included on page 3.13-17 of the Certified EIR requiring the fire department's review of development proposals and coordination with the fire department to reduce risk of and improve response to fires due to industrial activities would help to keep service demand increases to a minimum. In addition, the General Plan Update promotes compact development patterns through infill development, ensuring new development would be located close to existing fire stations. In general, new development anticipated under the General Plan Update would be located near the City's core and along major corridors. Furthermore, policies CIR-P-10 and CIR-P-12 that promote traffic calming, alternative transportation, and road diets contain language to ensure that emergency vehicles could efficiently access all parts of the Planning Area, thereby reducing the need for new facilities located closer to new development.

Should new fire service facilities need to be constructed in the future, construction of those facilities could result in environmental impacts, including potential disturbances or conversion of habitat, water pollution during construction, increased noise levels, and an increase in impermeable surfaces. If implementation of the General Plan Update results in the need for new fire service facilities, existing regulations such as CALGreen would serve to reduce potential environmental impacts associated with construction. Additionally, new projects would be subject to CEQA requirements for environmental assessment, which would allow for the identification and consideration of potential impacts and mitigation, although compliance would not necessarily guarantee that significant impacts would be avoided or mitigated. New facilities would be located consistent with specified land use designations and would be subject to policies included on page 3.13-17 of the Certified EIR for the General Plan Update. These policies would address potential impacts of siting, construction, and operation of new facilities to the extent assessed in other sections of this EIR. Policies include those requiring construction best management practices to limit land disturbance, development review to protect significant biological resources, air pollution mitigation measures, promotion of water- and energy-efficient construction and landscaping, implementation of noise mitigation measures, and management of archaeological materials found during development. The Certified EIR concluded that due to the minimal effects that the development of new facilities could have on the environment with compliance with existing regulations and General Plan policies, the concentration of new development in areas already well-served by fire protection services, and the addition of policies to reduce fire hazards in the City, the impact of the General Plan Update with respect to fire protection is considered less than significant.

(b) Police Protection?

As discussed in the Certified EIR, no new police service facilities are included in the General Plan Update. However, the Los Angeles County Sheriff's Department (LASD) maintains other facilities outside of the Planning Area that are available to the City immediately, including the Homicide Bureau, Aero Bureau, OSS (gang unit), and Traffic Services Bureau. If needed, 22 other LASD stations are also available to send resources to Carson. There are approximately 1.9 officers per 1,000 residents in Carson as of 2020. While the General Plan Update would result in additional population that might increase demand for service, policies included on pages 3.13-16 and 3.13-17 of the Certified EIR would reduce the need for additional police services. The General Plan Update promotes Crime Prevention through Environmental Design (CPTED) and other public safety programs, which would help to keep service demand increases to a minimum. In addition, policies promote compact development patterns achieved through infill development and revitalization of mixed-use areas in the core and along key corridors. Thus, potential future development would be located close to the existing police station. Furthermore, policies regarding emergency access, and acceptable travel flow would ensure that emergency vehicles could efficiently access all parts of the Planning Area, thereby reducing the need for new facilities located closer to new development.

Should new police service facilities need to be constructed in the future, construction of those facilities could result in environmental impacts, including disturbances or conversion of habitat, water pollution during construction, increased noise levels, and an increase in impermeable surfaces. If growth due to implementation of the General Plan Update results in the need for new police service facilities, new projects would be subject to CEQA requirements for environmental assessment, which would allow for the identification and consideration of potential impacts and mitigation, although compliance would not necessarily guarantee that significant impacts would be avoided or mitigated. New facilities would be located consistent with specified land use designations and would be subject to the policies in the General Plan Update that would address potential impacts of siting, construction, and operation of new facilities to the extent assessed in other sections of the Certified EIR. Policies include those requiring construction best management practices to limit land disturbance, development review to protect significant biological resources, air pollution mitigation measures, promotion of water- and energy-efficient construction and landscaping, implementation of noise mitigation measures, and management of archaeological materials found during development.

The Certified EIR concluded that due to the minimal effects that the development of new facilities would have on the environment with compliance with existing regulations and General Plan Update policies, the concentration of new development in areas already served by police protection services, and the addition of policies to address crime potential in the City, the impact of the General Plan Update with respect to police services is considered less than significant.

(c) Schools?

As discussed in the Certified EIR, the General Plan Update anticipates the construction of up to 13,710 new potential housing units in the Planning Area by 2040. The General Plan Update projects a very modest growth in Carson public school enrollment by approximately 360 elementary students, 62 junior high school students, and 201 high school students, between 2020 and 2040. No new school facilities are included in the General Plan Update. Although capacity at existing facilities is estimated to be sufficient to accommodate future publics-school students, demand for new facilities is not based solely on total school capacity but also on the geographic distribution of potential residential growth in relation to the distribution of school capacity. If new residential development occurs where the capacity of nearby schools is limited, new school capacity also may be required.

The construction of new schools or alterations to existing schools could have environmental impacts, including potential disturbances or conversion of habitat, water pollution during construction, increased noise levels, and an increase in impermeable surfaces. The siting of new schools is regulated by the California Department of Education (CDE). The California Education Code contains various provisions governing the siting of new public schools that require school districts to consider potential hazards to school occupants as well as other factors relevant to the public interest prior to the acquisition of a proposed school site. Although in many cases the avoidance or mitigation of hazards to school occupants would reduce impacts to the surrounding environment, the provisions of the California Education Code would not eliminate the potential for all construction-based or operational impacts of a new school.

In the event that the growth anticipated by the General Plan Update results in the need for new or expanded public school facilities, projects would be subject to CEQA requirements for environmental assessment, which would allow for the identification and consideration of potential impacts and mitigation, although compliance would not necessarily guarantee that significant impacts would be avoided or mitigated. New facilities would be located consistent with specified land use designations and would be subject to policies included on pages 3.13-16 and 3.13-17 of the Certified EIR for the General Plan Update that would address potential impacts of siting, construction, and operation of new facilities. Policies include those requiring construction best management practices to limit land disturbance, development review to protect significant biological resources, air pollution mitigation measures, promotion of water- and energy-efficient construction and landscaping, implementation of noise mitigation measures, and management of archaeological materials found during development.

Finally, both the Los Angeles Unified School District (LAUSD) and the Carson Unified School District (CUSD) would continue to collect development impact fees throughout implementation of the General Plan Update, meaning future development would incrementally pay for any needed facility upgrades and expansions. The payment of

statutory fees fully mitigates the impacts of development on school facilities for purposes of CEQA per Senate Bill (SB) 50.

The Certified EIR concluded that given that schools in the Planning Area have sufficient facility capacity to meet projected enrollment needs, that the development of new facilities would have minimal effects on the environment with compliance with existing regulations and the General Plan Update's policies, and that all new development would pay school impact fees, the impact of the General Plan Update with respect to public school facilities is considered less than significant.

(d) Parks?

As discussed in the Certified EIR, the General Plan Update would not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facilities would occur or be accelerated. In addition, the General Plan Update would not have a significant impact due to inclusion of recreational facilities or required construction or expansion of recreational facilities which might have an adverse physical effect on the environment. As a result, the Certified EIR concluded that the impact of the General Plan Update with respect to park and recreation facilities is considered less than significant.

(e) Other Public Facilities?

As discussed in the Certified EIR, the anticipated growth associated with implementation of the General Plan Update may have an impact related to other public facilities, such as administrative facilities and libraries. The General Plan Update does not establish precise service standards for these other public facilities; rather, it includes policies on pages 3.13-16 and 3.13-17 of the Certified EIR that direct the City to provide facilities commensurate with new growth and demographic changes. Should implementation of the General Plan Update result in the need for new public facilities, new projects would be subject to CEQA requirements for environmental assessment, which would allow for the identification and consideration of potential impacts and mitigation, although compliance would not necessarily guarantee that significant impacts would be avoided or mitigated. New facilities would be located consistent with specified land use designations and would be subject to the policies in the General Plan Update. These policies would address potential impacts of siting, construction, and operation of new facilities to the extent assessed in other sections of this EIR. Policies include those requiring construction best management practices to limit land disturbance, development review to protect significant biological resources, air pollution mitigation measures, promotion of water- and energy-efficient construction and landscaping, implementation of noise mitigation measures, and management of archaeological materials found during development. The Certified EIR concluded that due to the minimal effects that the development of new facilities would have on the environment with compliance with existing regulations and General Plan Update policies, the impact of the General Plan Update with respect to public facilities is considered less than significant.

3.15.2 Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

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:

(a) Fire Protection?

The Project Site is located in an urban area and is currently undeveloped. County of Los Angeles Fire Station 127, located at 2049 East 223rd Street approximately 1.4 miles southeast of the Project Site, is the fire station closest to the site. The Modified Project includes development of an infill site with 62 residential dwelling units, allowed under the existing zoning and land use designation for the site, as amended by the General Plan Amendment and Specific Plan Amendment that are part of the Modified Project. The Modified Project would help the City meet its RHNA obligation of 5,618 new housing units and as such, the Modified Project's population increase would fall within the net service population increase of 43,600 residents by 2040 considered in the impact analysis in the Certified EIR and would not create a demand for fire protection not already considered in the Certified EIR. Additionally, the Modified Project would be required to comply with all applicable Fire Code regulations, which would reduce the demand for fire protection services. Thus, the Modified Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered fire protection facilities, need for new or physically altered fire protection 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 fire protection services. Therefore, the Modified Project would not result in new or increased significant impacts beyond those identified in the Certified EIR.

(b) Police Protection?

The Project Site is located in an urban area and is currently undeveloped. The Modified Project includes development of an infill site with 62 residential dwelling units, allowed under the existing zoning and land use designation for the site, as amended by the General Plan Amendment and Specific Plan Amendment that are part of the Modified Project. The Modified Project would help the City meet its RHNA obligation of 5,618 new housing units and as such, the Modified Project's population increase would fall within the net service population increase of 43,600 residents by 2040 considered in the impact analysis in the Certified EIR and would not create a demand for police protection not already considered in the Certified EIR. Additionally, the Modified Project would include security features such as controlled access and lighting and would comply with emergency access requirements, all of which would reduce the demand for police protection services. Thus, the Modified Project would not result in substantial adverse

physical impacts associated with the provision of new or physically altered police protection facilities, need for new or physically altered police protection 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 police protection services. Therefore, the Modified Project would not result in new or increased significant impacts beyond those identified in the Certified EIR.

(c) Schools?

The Project Site is located in an urban area and is currently undeveloped. The Modified Project includes development of an infill site with 62 residential dwelling units, allowed under the existing zoning and land use designation for the site, as amended by the General Plan Amendment and Specific Plan Amendment that are part of the Modified Project. The Modified Project would generate school-aged children and would create a need for school services. The Modified Project would help the City meet its RHNA obligation of 5,618 new housing units and as such, the Modified Project's population increase would fall within the net service population increase of 43,600 residents by 2040 considered in the impact analysis in the Certified EIR and would not create a demand for schools not already contemplated in the Certified EIR. Additionally, the Modified Project would be required to pay Developer Fees to offset the Modified Project's need for school services. Thus, the Modified Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered school facilities, need for new or physically altered school facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, or other performance objectives for any of the school services. Therefore, the Modified Project would not result in new or increased significant impacts beyond those identified in the Certified EIR.

(d) Parks?

The Project Site is located in an urban area and is currently undeveloped. Parks and recreational facilities in the Project Site area include Perry Street Mini Park, Calas Park with public sports and fitness facilities, and Dolphin Park with sports facilities and afterschool programs. The Modified Project includes development of an infill site with 62 residential dwelling units, allowed under the existing zoning and land use designation for the site, as amended by the General Plan Amendment and Specific Plan Amendment that are part of the Modified Project. The Modified Project would generate a residential population, which would create a demand for parks and recreational facilities. The Modified Project would provide a total of 33,793 square feet of open space. Open space amenities included as part of the Modified Project include an outdoor seating and dining area, a barbeque island, lawn areas, and a pedestrian paseo. The Modified Project would help the City meet its RHNA obligation of 5,618 new housing units and as such, the Modified Project's population increase would fall within the net service population increase of 43,600 residents by 2040 considered in the impact analysis in the Certified EIR and would not create a demand for parks and recreational facilities not already

contemplated in the Certified EIR. Thus, the Modified Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered park and recreational facilities, need for new or physically altered parks and recreational facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, or other performance objectives for any of the parks and recreational services. Therefore, the Modified Project would not result in new or increased significant impacts beyond those identified in the Certified EIR.

(e) Other Public Facilities?

The Project Site is located in an urban area and is currently undeveloped. The Modified Project includes development of an infill site with 62 residential dwelling units, allowed under the existing zoning and land use designation for the site, as amended by the General Plan Amendment and Specific Plan Amendment that are part of the Modified Project. The Modified Project would generate a residential population, which would create a demand for administrative facilities and libraries. However, the Modified Project would help the City meet its RHNA obligation of 5,618 new housing units and as such, the Modified Project's population increase would fall within the net service population increase of 43,600 residents by 2040 considered in the impact analysis in the Certified EIR and would not create a demand for other public facilities not already considered in the Certified EIR. Thus, the Modified Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered public facilities, need for new or physically altered public facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, or other performance objectives for any public services. Therefore, the Modified Project would not result in new or increased significant impacts beyond those identified in the Certified EIR.

3.15.3 Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

No. As discussed above, the Modified Project would not result in any new or more severe significant impacts beyond what were identified in the Certified EIR.

3.15.4 Any New Information Requiring New Analysis or Verification?

No. There is no new information requiring new analysis or verification.

3.15.5 EIR's Mitigation Measures Addressing Impact

None required.

3.15.6 Conclusion

As discussed above, the Modified Project would not result in any of the conditions set forth in PRC Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Supplemental or Subsequent EIR.

3.16 RECREATION

Issues (and supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
RECREATION					
(a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	Less Than Significant	No	No	No	No
(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	No	No	No	No

Impacts related to recreation are discussed in the Certified EIR on pages 3.14-1 through 3.14-18.

3.16.1 Impact Determination in the EIR

(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?

As discussed in the Certified EIR, a significant amount of new parkland is expected to be added to the existing public parkland inventory, including greenways and parts of redeveloped industrial sites. The Shell property on East Del Amo Boulevard and South Wilmington Avenue is a potential source of new parkland, including an approximately seven-acre greenway and at least 18 acres of community or neighborhood park. Additionally, the General Plan Update proposes some locations for future park additions—consisting of greenways within utility corridors, greenways along the Dominguez Channel, greenway corridors/boulevards, redevelopment of industrial or underutilized commercial sites, and new civic spaces as neighborhood nodes—that will be further refined in a Parks and Recreation Master Plan. Additionally, the City could add more than 180 acres of parkland to its inventory, which exceeds the 84.7 additional acres of parkland that the City would need to meet future demand. Therefore, the General Plan Update would maintain the City's existing parkland ratio of 1.9 acres per 1,000 residents.

The General Plan Update includes provisions to ensure ongoing expansion, investment in, and maintenance of public recreation facilities, thus minimizing substantial physical deterioration of existing or new facilities. Policies included on pages 3.13-16 and 3.13-17 of the Certified EIR for the General Plan Update require the identification of funding, as

well as development and maintenance of park impact fees, for the expansion and maintenance of parks, trails, and other recreational facilities and programs. The General Plan Update also seeks to develop future recreational facilities, such as by prioritizing the dedication of public parkland as a condition for new residential development, in response to the needs and preferences of the public by soliciting public opinion and ensuring that parks are distributed equitably throughout the City. Furthermore, the addition of new parks and recreational facilities that are proposed or underway, including The Creek at Dominguez Hills, Wishing Tree Park, and Carson Country Mart will help serve residents in the Planning Area, even if they are not counted toward public parkland.

The Certified EIR concluded that given that the General Plan Update would help reduce the likelihood that any existing neighborhood, community, or regional parks, or other recreational facilities would experience overuse that could result in the physical deterioration of those facilities and that policies are designed to minimize the environmental impact of park and recreational facility development, including the development of design and site planning standards that consider energy and water efficiency, sustainable design elements, and habitat and cultural resource preservation, the impact associated with substantial physical deterioration of park and recreation facilities from increased demand would be less than significant.

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

As discussed in the Certified EIR, the General Plan Update anticipates the development of new parks and greenways throughout Carson. In addition, the General Plan Update calls for the continued support and adequate provision of civic spaces and recreational facilities in keeping with the needs and preferences of the population. Should any new recreational facilities need to be constructed in the future, construction of those facilities could result in environmental impacts, including potential disturbances or conversion of habitat, water pollution during construction, increased noise levels, and an increase in impermeable surfaces.

The General Plan Update seeks to develop future recreational facilities in order to meet the anticipated increase in demand due to projected population growth, such as by prioritizing the dedication of public parkland as a condition for new residential development, which will ensure that the City can maintain its existing parkland ratio. The addition of new recreational facilities that are proposed or underway, including The Creek at Dominguez Hills and Carson Country Mart, will also help meet the needs of residents in the Planning Area, even if they are privately-owned spaces and therefore not counted toward public parkland.

New parks and recreational facilities would be subject to CEQA requirements for environmental assessment. Although compliance would not necessarily guarantee that significant impacts would be avoided or mitigated, it would allow for the identification and

consideration of potential impacts and mitigation. The precise amount, type, and location of the new parks and recreational facilities would be determined during the planning process for individual development projects or master/specific plans and would be consistent with the land use designations and policies.

Policies—including development of park and recreational facility design and planning standards that consider energy and water use efficiency and sensitive habitat preservation, and incorporate natural and/or drought-tolerant landscaping where reasonable; promotion of sustainable stormwater management through the construction of onsite green infrastructure; and provisions for the construction of infill development and preservation of open space and natural areas—are designed to minimize the environmental impact of development of new parks or recreational facilities.

Therefore, the Certified EIR concluded that the impact associated with the construction or expansion of new recreation facilities would be less than significant with implementation of existing regulations and General Plan policies.

3.16.2 Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

(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?

The Project Site is located in an urban area and is currently undeveloped. Parks and recreational facilities in the Project Site area include Perry Street Mini Park, Calas Park with public sports and fitness facilities, and Dolphin Park with sports facilities and afterschool programs. The Modified Project includes development of an infill site with 62 residential dwelling units, allowed under the existing zoning and land use designation for the site, as amended by the General Plan Amendment and Specific Plan Amendment that are part of the Modified Project. The Modified Project would generate a residential population, which would create a demand for parks and recreational facilities. The Modified Project would provide a total of 33,793 square feet of open space. Open space amenities included as part of the Modified Project include an outdoor seating and dining area, a barbeque island, lawn areas, and a pedestrian paseo. The Modified Project would help the City meet its RHNA obligation of 5,618 new housing units and as such, the Modified Project's population increase would fall within the net service population increase of 43,600 residents by 2040 considered in the impact analysis in the Certified EIR and would not create a demand for parks and recreational facilities not already contemplated in the Certified EIR. Thus, the Modified Project would not 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. Therefore, the Modified Project would not result in new or increased significant impacts beyond those identified in the Certified EIR.

(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?

The Modified Project does not include the development of recreational facilities, per se. The recreational facilities that would be developed as part of the Project are inherent components of the Project and are not separate from the Project. The impacts associated with the developing the recreational facilities are captured within the impacts of the Project as a whole. The Project would not require the construction or expansion of recreational facilities. Therefore, the Modified Project would not result in new or increased significant impacts beyond those identified in the Certified EIR.

3.16.3 Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

No. As discussed above, the Modified Project would not result in any new or more severe significant impacts beyond what were identified in the Certified EIR.

3.16.4 Any New Information Requiring New Analysis or Verification?

No. There is no new information requiring new analysis or verification.

3.16.5 EIR's Mitigation Measures Addressing Impact

None required.

3.16.6 Conclusion

As discussed above, the Modified Project would not result in any of the conditions set forth in PRC Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Supplemental or Subsequent EIR.

3.17 TRANSPORTATION

Issues (and supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
TRANSPORTATION / TRAFFIC: Would the project:					
(a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	Less Than Significant	No	No	No	No
(b) Conflict or be inconsistent with CEQA Guidelines Section 15064.3 subdivision (b)?	Significant and Unavoidable	No	No	No	No
(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	No	No	No	No
(d) Result in inadequate emergency access?	Less Than Significant	No	No	No	No

Impacts related to transportation are discussed in the Certified EIR on pages 3.15-1 through 3.15-28.

3.17.1 Impact Determination in the EIR

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

As discussed in the Certified EIR, implementation of the General Plan Update would improve connections to local and regional transit service and encourage the use of alternative modes of transportation, including walking and biking through supportive land use development. The Planning Area contains existing non-vehicular transportation, such as pedestrian and bicycle facilities and transit services.

The roadway network in Carson is considerably built out, such that no roadway capacity improvements (lane additions, lane widening, medians) are that would change the functional classification of the roadway network. The General Plan Update implements multi-modal network goals and policies listed on pages 3.2-29 through 3.2-42 of the Certified EIR to calm traffic, install and improve bike lanes, and improve public transportation services.

Implementation of the General Plan Update would enable the City to improve bicycling programs and infrastructure throughout the City, providing connections to the existing and bicycle network. Implementation of General Plan Update would also improve pedestrian

infrastructure by providing existing and planned pedestrian facilities and prioritizing pedestrian safety.

New trips and increased VMT may affect the operation of existing transit services or routes. Several policies and goals listed on pages 3.2-29 through 3.2-42 of the Certified EIR included in the General Plan Update address these impacts by balancing the multimodal transportation network to provide alternatives to the automobile, improving transit service connections, and encouraging the use of alternative modes of transportation to minimize the potential for negative effects. The Certified EIR concluded that based on the availability of nonvehicular transportation options for the community and the Circulation Goals and policies provided in the General Plan Update, the plan would not conflict with any applicable program, plan, or ordinance on the circulation system, including transit, roadway, bicycle, and pedestrian facilities and the impact would be less than significant.

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

VMT Analysis

Land use and corresponding socioeconomic data forecasts were developed for the General Plan Update, and the SCAG model was subsequently updated to reflect General Plan Update assumptions and run to develop VMT estimates for the buildout of General Plan Update. Under Existing/Baseline Conditions, the Planning Area comprises a service population of 199,149 (total number of residents and employees) and generates 7,867,557 daily total VMT, including private automobiles and trucks. This results in Baseline VMT metrics of 39.5 VMT per service population, 14.3 Home-Based VMT per capita for residential land uses, and 20 Home-Based Work VMT per employee for employment-generating land uses.

Under Cumulative Base (2040 No Project) Conditions, the Planning Area is estimated to comprise a service population of 221,195 and generate 8,405,911 daily total VMT. This results in estimates of 38 VMT per service population, 12.7 Home-Based VMT per capita for residential land uses, and 16.2 Home-Based Work VMT per employee for employment-generating land uses. Under Cumulative Plus Project (2040) Conditions, total VMT increases are compared to the ‘Without Project’ scenario to reflect additional development in the City of Carson. The Planning Area is estimated to comprise a service population of 255,130 and generate 9,505,005 total daily VMT, which results in estimates of 37.3 VMT per service population, 12.4 Home-Based VMT per capita for residential land uses, and 16.0 Home-Based Work VMT per employee for employment-generating land uses.

VMT Impact Thresholds

The City has established the following significance threshold for VMT transportation impacts for land use plans:

- Plan exceeds 15 percent below City + SOI Baseline VMT for total VMT per service population, Residential VMT per resident, and Employee VMT per employee Project VMT Impact Analysis

To determine if Project would result in a transportation impact, the following steps were taken:

- The General Plan Update was compared with the SCAG RTP/SCS for consistency.
- If consistent, that may support a finding of less than significant if the change from the existing baseline VMT to the Plus Project VMT demonstrates a 15 percent reduction in total daily VMT per service population, a 15 percent reduction in daily Home-Based VMT per capita, and a 15 percent reduction in Home-Based Work VMT per employee. Therefore, these metrics were estimated and compared.
- For informational purposes, a comparison of 2040 No Project and 2040 Plus Project is also provided to help the public and stakeholders understand how development under the General Plan Update would affect travel patterns relative to the currently adopted plan.

The Home-Based Work VMT per employee is estimated to be 15 percent or more below the Baseline VMT and would therefore not result in a significant impact. However, total VMT per service population and Home-Based VMT per Capita are not 15 percent or more below the Baseline VMT, indicating a significant impact for these metrics.

All three VMT metrics perform better than the City's Baseline (approximately 6 percent to 20 percent better). However, the state's guidance and the City's VMT significance thresholds require the VMT metrics to perform at least 15 percent better than the City's baseline average in order to result in a less than significant impact. As such, the following project features were evaluated to assess their potential benefits for reducing total VMT per service population:

1. Implementation of Bike Improvements: The City is expanding its bicycle and pedestrian networks as proposed in the City's Master Plan of Bikeways and the existing General Plan. These bike improvements were examined since VMT reduction benefits are likely to accrue once the supporting infrastructure is available. As discussed in its latest handbook for analyzing GHG emission reductions, the California Air Pollution Control Officer's Association (CAPCOA) found that strategies involving bikeway improvements or installations can achieve from 0.2 percent to 0.8 percent VMT reduction based on how extensive the improvements are. The City is already designing or implementing the bikeway improvements. Using guidance provided by CAPCOA, the implementation of these

improvements was estimated to result in a 0.35 percent VMT reduction. This percent reduction can be applied at the community-level to all trips as per CAPCOA guidance.

2. Bikeshare program: After the bicycle improvement projects are implemented, a bikeshare system could be promoted. VMT reduction benefits from bikeshare available from CAPCOA are estimated to provide about 0.02 percent to 0.06 percent VMT reduction benefits for pedal and electric bikeshare programs, respectively. Since potential reductions are relatively small, no VMT reductions are being applied for this feature.

3. Telecommuting Options: Potential VMT reductions could result from the encouragement of telecommuting and alternative work schedules in Carson. In the CAPCOA handbook, these reductions are available through trip reduction programs and are typically led by employers and could be achieved through a variety of approaches, such as strategies or mandates implemented by local authorities. Flexible work policies that allow employees to work part-time or full-time from home are becoming more common due to a variety of factors such as COVID-19, access to childcare, advances in technology, and more employers offering this option.

Prior to the COVID-19 lockdown, national trends in working from home showed a mixed picture that varied depending on the survey and measures used. The annual U.S. Census Bureau American Community Survey presents patterns of full-time work at home only, which has increased at a gradual pace from 3.6 percent in 2005 to 4.3 percent in 2010, and 5.2 percent in 2017 for the nation. The same picture is present in our region of focus. Between 2013 and 2016, Los Angeles County full-time rates remained at 5.6 percent. The decennial National Household Transportation Survey (NHTS) provides more detail on both part- and full-time flexible workplace practices, including work at home, flexible start times, self-employment, and work locations. According to NHTS data, the percentage of workers who indicated they were eligible to work from home has increased over time from 10 percent in 2001, to 13 percent in 2009, and to 18 percent in 2017. The increase is more pronounced in Los Angeles, where 16 percent of workers had the option in 2009 and around 40 percent had the option in 2017.

World Economic Forum documents numerous studies, both academic and corporate, that establish the prevalence of flexible work policies today and its popularity and value to the workforce going forward. A recent University of California, Davis study on effects of COVID-19 on mobility in the SCAG region documents that “the percentage of hybrid workers continually increased, from 14.4 percent of all respondents pre-pandemic to 29.6 percent in summer 2021 and is expected by respondents to continue increasing through summer 2022.” The study authors also hint at the future of telework by stating that “sustained high adoption rates and frequency of remote work, and the expectation among respondents that they would be able to continue to work from home (including partial telework) in the future, highlight the current (and potential future) persistence of hybrid

forms of work." This persistence in flexible work practices is also documented in a recent study in the South Bay cities region.

Since telecommuting trends are more pronounced for certain jobs, the potential VMT reductions were examined by considering the City's employment mix. According to 2021 data from the U.S. Census Bureau, more than 16 percent of Carson's population is employed in employment categories that are amenable to telecommuting, including Management, Business and Finance, Computer and Mathematical, and Architecture and Engineering. The SCAG 2040 baseline model includes an assumed TDM factor of 17 percent for the SCAG region. To provide a more conservative analysis, this factor was adjusted downward to 12 percent. Given the persistent trends in flexible work and improvements in transit alternatives, a TDM factor of 12 percent was applied. This VMT reduction can be applied at the community-level.

The City is estimated to mitigate its total VMT by 244,490, Home-Based VMT by 43,978, and home-based work VMT by 44,232 miles. This would result in 36.3 total VMT per service population, 12.1 Home-Based VMT per capita, and 15.6 Home-Based work VMT per employee. With implementation of the measures described above, VMT impact associated with Home-Based VMT per capita can be mitigated as 12.1 is lower than the threshold value of 12.2 Home-Based VMT per capita. The impact associated with total VMT per service population will remain, thus resulting in a conflict with CEQA Guideline Section 15064.3, Subdivision (b). The Certified EIR concluded that this impact would be significant and unavoidable.

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

As discussed in the Certified EIR, the General Plan Update does not specify design features for the transportation system in the Planning Area and would thus not substantially increase hazards due to a design feature. Impacts regarding the potential increase of hazards due to a geometric design feature generally relates to the design of access points to and from the Planning Area and may include safety, operational, or capacity impacts that must be assessed. Given the programmatic nature of the General Plan Update, these are evaluated at the program/citywide level.

The land use diagram and policies listed on pages 3.2-29 through 3.2-42 of the Certified EIR for the General Plan Update emphasize transition areas and buffers between land uses of varying intensity, which would serve to reduce potential conflicts between users of the transportation system connected with each land use, including commercial and industrial truck traffic, commute traffic, pedestrians, and cyclists. The specific design and operations of individual future development projects are unknown at this time; however, policies included in the General Plan Update would serve to reduce potential impacts from future development.

Access locations for development allowed under the General Plan Update would be designed to the City's standards and would provide adequate sight distance, sidewalks, crosswalks, and pedestrian movement controls to meet the City's requirements to protect pedestrian safety. The installation of street trees and other potential impediments to adequate driver and pedestrian visibility in the public right-of-way would require review for sight distance and be designed to City standards and best practices to avoid obstructions. Pedestrian entrances separated from vehicular driveways would provide access from the adjacent streets. The General Plan Update has been developed with an emphasis on multi-modal street networks, which would improve compatibility between different transportations modes and between the transportation system and adjacent land uses. Policies that promote bicycle and pedestrian safety would help identify and address potential safety concerns.

As a result, the Certified EIR concluded that the General Plan Update would not substantially increase hazards due to a geometric design feature or incompatible use, and this impact is considered less than significant.

(d) Would the Project result in inadequate emergency access?

As discussed in the Certified EIR, the General Plan Update is presented at a programmatic level. Emergency accessibility is typically assessed at a project level. Project-level review required by the City includes site access review for emergency vehicles and traffic control plans that account for emergency vehicles. As stated above, future development under the General Plan Update would be compliant with the City's design guidelines that incorporate safety and emergency access needs, where applicable. The City's development review process would assure that future development under the General Plan Update would be consistent with these design guidelines and not hinder emergency access for individual sites. The Certified EIR concluded that for these reasons, the General Plan Update would not result in inadequate emergency access, and this impact is considered less than significant.

3.17.2 Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

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

The Project Site is located in an urban area and is currently undeveloped. The Modified Project includes development of an infill site with 62 residential dwelling units, allowed under the existing zoning and land use designation for the site, as amended by the General Plan Amendment and Specific Plan Amendment that are part of the Modified Project.

The Certified EIR analysis reviewed programs, plans, ordinances, and policies addressing the circulation system, including transit, roadway, bicycle, and pedestrian

facilities and found no conflicts. The Modified Project is consistent with City policies, programs, and ordinances such as increasing residential housing near corridors with transit, promoting active transportation, and directing commuter traffic to arterial streets and collectors, as appropriate. The Modified Project is consistent with City ordinances and would not preclude the implementation of a policy or projects identified in the City's Bike Plan. Thus, the Modified Project would not conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities. Therefore, the Modified Project would not result in new or increased significant impacts beyond those identified in the Certified EIR.

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

The Project Site is located in an urban area and is currently undeveloped. The Modified Project includes development of an infill site with 62 residential dwelling units, allowed under the existing zoning and land use designation for the site, as amended by the General Plan Amendment and Specific Plan Amendment that are part of the Modified Project.

High- and low-VMT maps were prepared when the City's *Transportation Study Guidelines* were developed. The maps indicate that Project Site is located in a portion of the City where daily homebased VMT per capita is 14.1, which is two percent less than the City average of 14.4, indicating the site is in a lower VMT area compared with the City's per capita average VMT for residential land uses.[2] Thus, the Modified Project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3 subdivision (b). Therefore, the Modified Project would not result in new or increased significant impacts beyond those identified in the Certified EIR.

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

The Project Site is located in an urban area and is currently undeveloped. The Modified Project includes development of an infill site with 62 residential dwelling units, allowed under the existing zoning and land use designation for the site, as amended by the General Plan Amendment and Specific Plan Amendment that are part of the Modified Project. The Modified Project's residential uses would be substantially similar to other residential development nearby. The Modified Project does not include development outside of the established boundaries of the infill site, and the Modified Project does not include development of any new roadway infrastructure. Also, the Modified Project's vehicle access points would be constructed in accordance with applicable City design guidelines. Thus, the Modified Project would not substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible

[2] *Carson Kott Site Residential Project CEQA Assessment, Fehr & Peers, October 16, 2024. Refer to Attachment G.*

uses (e.g., farm equipment). Therefore, the Modified Project would not result in new or increased significant impacts beyond those identified in the Certified EIR.

(d) Would the Project result in inadequate emergency access?

The Project Site is located in an urban area and is currently undeveloped. The Modified Project includes development of an infill site with 62 residential dwelling units, allowed under the existing zoning and land use designation for the site, as amended by the General Plan Amendment and Specific Plan Amendment that are part of the Modified Project. Consistent with the Certified EIR, as with all development in the City, the Modified Project would be required to comply with e City's design guidelines that incorporate safety and emergency access needs. The Modified Project would be required to undergo design review, which include a review of the Modified Project's plans for emergency access and the City ensuring that the Modified Project's emergency access meets all applicable standards. Thus, the Modified Project would not result in inadequate emergency access. Therefore, the Modified Project would not result in new or increased significant impacts beyond those identified in the Certified EIR.

3.17.3 Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

No. As discussed above, the Modified Project would not result in any new or more severe significant impacts beyond what were identified in the Certified EIR.

3.17.4 Any New Information Requiring New Analysis or Verification?

No. There is no new information requiring new analysis or verification.

3.17.5 EIR's Mitigation Measures Addressing Impact

None required.

3.17.6 Conclusion

As discussed above, the Modified Project would not result in any of the conditions set forth in PRC Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Supplemental or Subsequent EIR.

3.18 TRIBAL CULTURAL RESOURCES

Issues (and supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
TRIBAL CULTURAL RESOURCES: Would the project:					
(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, please, 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:					
(i) Listed or eligible for listing in the California Register of Historical Resources, or in the local register of historical resources as defined in Public Resources Code Section 5020.1(k)?	Less Than Significant	No	No	No	No
(ii) A resource determined by the lead agency in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?	Less Than Significant	No	No	No	No

Impacts related to tribal cultural resources are discussed in the Certified EIR on pages 3.16-1 through 3.16-18.

3.18.1 Impact Determination in the EIR

(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, please, 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:

> ***(i) Listed or eligible for listing in the California Register of Historical Resources, or in the local register of historical resources as defined in Public Resources Code Section 5020.1(k); or***
>
> ***(ii) A resource determined by the lead agency in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?***

Questions (a.i) and (a.ii) were addressed together in the Certified EIR.

As discussed in the Certified EIR, future development proposals initiated under the General Plan Update that include ground-disturbance activities (e.g., excavation, trenching, boring, grading, drilling, demolition, clearing/grubbing, etc.) have the potential to cause a substantial adverse change to tribal cultural resources as defined by Public Resources Code Section 21074. Specifically, anticipated development in the Planning Area would occur through infill development on vacant property, and through redevelopment or revitalization of underutilized properties, which could result in damage to tribal cultural resources as a result of construction-related ground disturbance. In addition, infrastructure and other improvements requiring ground disturbance could result in damage to or destruction of tribal cultural resources buried below the ground surface. Future development that results in changes to the setting through incompatible adjacent construction or facilitates public access to culturally significant sites could result in additional impacts to tribal cultural resources. Future development that does not require ground-disturbing activities would cause no impacts on tribal cultural resources. The NAHC SLF search for the City yielded negative results. The City submitted notification and request to consult letters to five Native American individuals and organizations on March 29, 2021, pursuant to AB 52 and to seven Native American individuals and organizations on March 29, 2021, pursuant to SB 18. On April 5, 2021, the City received a letter from Chairman Salas of the Gabrieleño Band requesting consultation. The City set up a consultation call for October 7, 2021. However, the Gabrieleño Band reached out to the City via email prior to the meeting and indicated that since the Project is a General Plan Update with no ground disturbance proposed, they do not need to consult. To date, no other responses from the Native American community have been received as part of the AB 52 nor SB 18 tribal consultation effort.

In summary, no tribal cultural resources were identified within or adjacent to the Planning Area. However, there are unevaluated prehistoric resources within the Planning Area that could be potential tribal cultural resources and given the historic occupation of the area, it is possible that future development within the Planning Area may result in the

identification of unrecorded tribal cultural resources. However, future projects would be required to comply with the provisions of SB 18 and AB 52 to incorporate tribal consultation into the CEQA process to ensure that tribal cultural resources are properly identified and that mitigation measures are identified to reduce impacts on these resources. The Certified EIR concluded that additionally, applicable General Plan policies would help address impacts to tribal cultural resources by requiring project-specific tribal consultation and the preparation of an assessment for the potential to encounter tribal cultural resources. Adherence to existing regulations and General Plan Update policies would ensure that the General Plan Update's impact with respect to tribal cultural resources would be less than significant.

3.18.2 Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

(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, please, 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:

> ***(i) Listed or eligible for listing in the California Register of Historical Resources, or in the local register of historical resources as defined in Public Resources Code Section 5020.1(k); or***
>
> ***(ii) 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, the lead agency shall consider the significance of the resource to a California Native American tribe.***

Questions (a.i) and (a.ii) were addressed together in the Certified EIR and are addressed together below.

The Project Site is located in an urban area and is currently undeveloped. The Modified Project includes development of an infill site with 62 residential dwelling units, allowed under the existing zoning and land use designation for the site, as amended by the General Plan Amendment and Specific Plan Amendment that are part of the Modified Project. No known tribal cultural resources exist at the Project Site. However, given that tribal cultural resources are known to exist throughout the Project Site area, it is possible that unknown resources could be uncovered during the Modified Project's construction phase. However, as required by Mitigation Measure CUL-2 identified in the Certified EIR and applicable to the Modified Project, the Modified Project would be required to prepare an assessment of the potential presence of archaeological and tribal cultural resources, including a site survey and a records search of the California Historical Resources Information System at the South Central Coastal Information Center (SCCIC). As warranted by the results of the assessment, additional studies may be required to identify

and address project-specific impacts on archaeological and tribal cultural resources. Assessments would be prepared according to National Register Bulletin 24: Guidelines for Local Surveys: A Basis for Preservation Planning and the Secretary of the Interior's Standards and Guidelines for Archaeology and Historic Preservation. The City would incorporate the study recommendations as Modified Project conditions of approval to ensure that impacts on archaeological and/or tribal cultural resources are mitigated to the maximum extent possible. Thus, the Modified Project would not 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 listed or eligible for listing in the California Register of Historical Resources, or in the local register of historical resources as defined in Public Resources Code Section 5020.1(k) or 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. Therefore, the Modified Project would not result in new or increased significant impacts beyond those identified in the Certified EIR.

3.18.3 Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

No. As discussed above, the Modified Project would not result in any new or more severe significant impacts beyond what were identified in the Certified EIR.

3.18.4 Any New Information Requiring New Analysis or Verification?

No. There is no new information requiring new analysis or verification.

3.18.5 EIR's Mitigation Measures Addressing Impact

None required.

3.18.6 Conclusion

As discussed above, the Modified Project would not result in any of the conditions set forth in PRC Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Supplemental or Subsequent EIR.

3.19 UTILITIES AND SERVICE SYSTEMS

Issues (and supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
UTILITIES AND SERVICE SYSTEMS: Would the project:					
(a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities or expansion of existing facilities, the construction of which could cause significant environment effects?	Less Than Significant	No	No	No	No
(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	No	No	No	No
(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	No	No	No	No
(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	No	No	No	No
(e) Comply with federal, state and local management and reduction statutes and regulations related to solid waste?	Less Than Significant	No	No	No	No

Impacts related to utilities and service systems are discussed in the Certified EIR on pages 3.17-1 through 3.17-30.

3.19.1 Impact Determination in the EIR

(a) Would the Project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power,

natural gas, or telecommunications facilities or expansion of existing facilities, the construction of which could cause significant environment effects?

Construction of Water Treatment Facilities

As discussed in the Certified EIR, the Metropolitan Water District (MWD) treats the surface water provided to the West Basin Municipal Water District (WBMWD) and Central Basin Municipal Water District (CBMWD) at the F.E. Weymouth treatment plant located in La Verne. The facility has a capacity of 520 million gallons per day (MGD) and is currently treating an average of 224 MGD. Growth anticipated under the General Plan Update is expected to result in an increase of approximately 6.8 MGD of water over existing conditions. With an excess treatment capacity of 296 MGD, the F.E. Weymouth has sufficient remaining capacity to treat the full increase in water attributable to growth anticipated under the General Plan Update. Additionally, policies included on pages 3.17-21 through 3.17-23 for the General Plan Update aim to conserve water through public education programs and the promotion of water-conserving devices and practices in both new construction and major alterations as well as additions to existing buildings. Such policies would help to reduce the demand on existing water treatment infrastructure and allow for meaningful consideration of potential impacts of any future decisions regarding the provision of new infrastructure. The Certified EIR concluded that for these reasons, growth under the General Plan Update would not require or result in the relocation or construction of new or expanded water treatment facilities, and this impact would be less than significant.

Construction of Wastewater Treatment Facilities

As discussed in the Certified EIR, wastewater generated in the City is treated at the Joint Water Pollution Control Plant, which is located in Carson and operated by the LACSD. The facility has sufficient remaining capacity to treat the full increase in sewage attributable to growth anticipated under the General Plan. Additionally, policies included on pages 3.17-21 through 3.17-23 for the General Plan Update aim to conserve water by curbing demand for domestic and commercial purposes and promoting water conservation strategies, thus reducing demand for water, and in turn, the generation of wastewater. Therefore, the Certified EIR concluded that growth under the General Plan would not require or result in the relocation or construction of new or expanded water treatment facilities, and this impact would be less than significant.

Construction of Storm Drainage Facilities

As discussed in the Certified EIR, the Los Angeles County Flood Control District (LACFCD) owns and maintains all major flood control channels. In addition, a majority of the storm drain system within the City was formally transferred through resolution to LACFCD, which maintains complete ownership and maintenance of the system. However, storm water quality is the responsibility of the City.

Storm water runoff may mobilize pollutants (e.g., trash, oil, etc.) and sediments, which contribute to pollution in rivers, lakes, and the ocean. Conversely, storm water runoff can be seen as a resource for recharging groundwater supplies. The state regulates storm water discharges through the NPDES program. The NPDES program was established to ensure storm water is used as a resource, while reducing any harmful pollutants to the greatest extent possible to maintain the beneficial uses of our rivers, lakes and ocean.

The RWQCBs have adopted NPDES permits to regulate storm water for municipalities. Under that permit is the Municipal Storm Water Program, which regulates storm water discharges from MS4s throughout California. An MS4 is defined as a conveyance or system of conveyances (including roads with drainage systems, municipal streets, catch basins, curbs, gutters, ditches, human-made channels, or storm drains) owned or operated by a local agency. In this area, the Los Angeles RWQCB holds the NPDES permit and Los Angeles County holds the MS4 permit.

Carson is a co-permittee under the County's MS4 permit. The County's MS4 permit was last amended in November 2016. The permit details discharge prohibitions (i.e., monitoring and reporting, watershed management programs, control measures, and total maximum daily loads). In addition, the City has joined the Dominguez Channel Watershed Management Group, which was developed to implement the NPDES requirements on a watershed scale.

A key provision of these regulations requires that the initial (or "first flush") storm water runoff is detained and treated on-site prior to entering the County's storm drain system. First flush is the initial surface runoff during a storm event that typically contain higher concentrations of pollutants compared to the remainder of the storm. Specifically, the County requires that projects mitigate the first three-quarter inch of rainfall for each storm event and be designed to minimize the introduction of pollutants from the site runoff into the storm water conveyance system. Any new development and/or significant redevelopment in the City will be subject to these requirements. From a storm drain infrastructure perspective, these regulations restrict increases in storm water runoff from any new development and/or significant redevelopment. Therefore, existing storm drain conveyance systems will likely not require upsizing, regardless of changes to land use types. Should new storm drain conveyance infrastructure be required, construction of those facilities could result in adverse environmental effects. As all new storm drain conveyance infrastructure could be provided within and immediately surrounding the Planning Area, the potential impacts of these improvements are considered throughout the technical sections of the Certified EIR. In addition, future facilities would be required to comply with the City's requirements for construction projects, including but not limited to, grading permits and encroachment permits. Therefore, the Certified EIR concluded that storm water generated by development allowed under the General Plan Update would not result in additional impacts related to the provision of storm drain infrastructure, and this impact would be less than significant.

Construction of Electrical Facilities

As discussed in the Certified EIR, it is possible that development proposed under the General Plan could result in the provision of new electrical power facilities, including new or upgraded substations and/or transmission lines. However, all new development would be subject to the CALGreen code, which establishes mandatory energy efficiency measures for new residential and non-residential buildings. Compliance with current CALGreen requirements and policies included on pages 3.17-21 through 3.17-23 that promote renewable energy generation and energy efficiency would ensure that new development associated with the implementation of the General Plan Update would be energy efficient, thus reducing the need for new electrical power infrastructure. Should upgrades to new facilities be required, construction of those facilities could result in adverse environmental effects. As all new electrical power infrastructure could be provided within and immediately surrounding the Planning Area, the potential impacts of these improvements are considered throughout the technical sections of the Certified EIR. In addition, future facilities would be required to comply with the City's requirements for construction projects, including but not limited to, grading permits and encroachment permits. Therefore, the Certified EIR concluded that project-related electricity demand would not result in additional impacts related to the provision of electrical power infrastructure, and this impact would be less than significant.

Construction of Natural Gas Facilities

As discussed in the Certified EIR, it is possible that development proposed under the General Plan could result in the provision of new natural gas facilities, including new and/or upgraded pipelines. SoCalGas projects that total gas demand in its service area would decline at an annual rate of one percent from 2020–2035 due to modest economic growth and CPUC-mandated energy efficiency standards and projects. Additionally, all new development would be subject to energy efficiency standards contained in the CALGreen code, thus reducing the need for new natural gas infrastructure. Should upgrades be required, construction of those facilities could result in adverse environmental effects. As all new natural gas infrastructure could be provided within and immediately surrounding the Planning Area, the potential impacts of these improvements are considered throughout the technical sections of the Certified EIR. In addition, future facilities would be required to comply with the City's requirements for construction projects, including but not limited to, grading permits and encroachment permits. Therefore, the Certified EIR concluded that project-related natural gas demand would not result in additional impacts related to the provision of natural gas infrastructure, and this impact would be less than significant.

Construction of Telecommunications Facilities

As discussed in the Certified EIR, it is possible that development proposed under the General Plan could result in the provision of new telecommunication facilities. Should upgrades to telecommunication infrastructure be required, construction of those facilities

could result in adverse environmental effects. As all new telecommunication infrastructure could be provided within and immediately surrounding the Planning Area, the potential impacts of these improvements are considered throughout the technical sections of the Certified EIR. In addition, future facilities would be required to comply with the City's requirements for construction projects, including but not limited to, grading permits and encroachment permits. Therefore, project related demand for new telecommunications services would not result in additional impacts related to the provision of telecommunication infrastructure, and this impact would be less than significant.

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

As discussed in the Certified EIR, the City is served by two water service providers, Cal Water and Golden State Water (GSW). Cal Water Dominguez District serves most of the City through a combination of local groundwater and surface water purchased from MWD. The anticipated water demand changes rely on per capita water consumption. As presented in Cal Water's 2020 Urban Water Management Plan, the Cal Water Dominguez District service area is currently using 157 gallons of water per capita per day (GPCD).

GSW serves the northwest corner of the City and also provides its customers with a combination of local groundwater and surface water purchased from the MWD. As presented in GSW's 2020 Urban Water Management Plan (UWMP), the service population was 278,787 in the year 2020. With a demand for potable and non-potable water in the year 2020 of 26,228 acre-feet (AF) per year (23,414,849 gallons per day), the GSW service area is currently using 84 gallons of water per GPCD.

Cal Water serves the majority of the City and has a higher per capita water use estimate than GSW. Therefore, based on estimated population increase of 43,600 residents due to implementation of the General Plan Update and a water use rate of 157 GPCD, water demand within the Planning Area would increase by approximately 6.8 MGD.

As stated in the 2020 UWMP for Cal Water, purchased water is 100 percent reliable and would make up the differences between demand and other projected supplies (groundwater and recycled water). As a result, Cal Water has adequate supplies to meet demand under normal, single dry year, and five consecutive dry year conditions through the year 2045, which is five years beyond the horizon year of the General Plan Update in 2040. In addition, as stated in the GSW 2020 UWMP, GSW also has reliable supplies to meet demand under normal, single dry year, and five consecutive dry year conditions through the year 2045. While it is expected that there will be sufficient water supplies available to serve the development associated with the General Plan Update from existing entitlements and resources, growth under the update was not specifically accounted for in the UWMP for each local water provider. However, as UWMPs are based on adopted land use forecasts and plans, Cal Water and GSW would be required to account for this growth during the next UWMP update cycle in 2025, and thus, they would have sufficient

time to account for future development in the City in their planning process prior to the General Plan Update's horizon year of 2040.

In addition, individual development proposals that meet the definition of a project under CEQA would be required to address water supply as part of the CEQA process, and for qualifying projects, a water supply assessment (WSA) would be required pursuant to SB 610 for inclusion in the project's CEQA analysis. The WSA discerns whether the expected demand from the development being proposed has been accounted for in the forecasted demands in the most recent UWMP. A Written Verification of Supply per SB 221 is prepared as a condition of approval for a subdivision map of 500 units or more. Considered a fail-safe mechanism to provide sufficient evidence that adequate water supplies are available before construction begins, the Written Verification of Supply is also prepared/adopted by the water supplier and approved by the land use authority. Depending on the project, one or both of these analyses may be required.

In addition, the City is taking several steps to decrease its reliance on imported water and overall water demand. For example, the City partners with the WBMWD to encourage residents to conserve water through programs such as the Water for Tomorrow Program, which seeks to protect the district's existing water supply as well as diversify and augment its sources. The City also requires projects to comply with CARSONSCAPE, the City's Model Water Efficient Landscape Ordinance (MWELO), which promotes the values and benefits of landscaping practices that integrate conservation and efficient use of water through planning, design, installation, maintenance, and management of water-efficient landscapes in new construction and rehabilitated projects.

Next, water providers in Carson such as Cal Water promote water conservation through rebates, conservation kits (which include high-efficiency showerheads, hose nozzles, faucet aerators, and toilet leak tablets), the Smart Landscape Tune-Up Program, and the H_2O Challenge educational program.

Furthermore, all new development would also be subject to water conservation standards contained in the CALGreen code. Compliance with current CALGreen requirements would ensure that new development associated with the implementation of the General Plan Update would establish water conservation features. Equally important, implementation of policies included on pages 3.17-21 through 3.17-23 for the General Plan Update would reduce the overall existing and future water usage in the City by curbing demand for domestic and commercial purposes and promoting water conservation strategies. Policies also seek to ensure the long-term quality and maintenance of water supplies by requiring the City to work with Cal Water, GSW and MWD to ensure adequate availability of water to meet future needs. Finally, in the event of a water shortage, Cal Water and GSW would rely on their Water Shortage Contingency Plans (WSCP), which are to be engaged in the case of a water shortage event, such as a drought or supply interruption. The WSCPs for both Cal Water and GSW include six levels to address shortage conditions ranging from up to 10 percent to greater than 50 percent shortage, identifies a suite of demand mitigation measures to implement at each

level, and identifies procedures to annually assess whether or not a water shortage is likely to occur in the coming year.

The Certified EIR concluded that for these reasons, sufficient water supply would be available to serve future development allowed under the General Plan Update during normal, dry, and multiple dry years. Therefore, the impact with respect to water supply would be less than significant.

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

As discussed in the Certified EIR, growth anticipated under the General Plan Update would generate additional wastewater. It is estimated that about 90 percent of the per capita water consumption becomes wastewater flows. As a result, it is estimated that growth anticipated under the General Plan Update would result in an increase of approximately 6.1 MGD (i.e., expected water use times wastewater generation factor) of wastewater over existing conditions.

Wastewater generated in the City is treated at the Joint Water Pollution Control Plant, which is located in Carson and operated by the LACSD. The plant has a design capacity of 400 MGD and currently treats an average of 260 MGD. Based on current treatment levels at the Joint Water Pollution Control Plant and the design capacity, the facility has sufficient remaining capacity to treat the full increase in sewage attributable to growth anticipated under the General Plan.

Additionally, policies included on pages 3.17-21 through 3.17-23 for the General Plan Update aim to conserve water by curbing demand for domestic and commercial purposes and promoting water conservation strategies, thus reducing demand for water, and in turn, the generation of wastewater. Furthermore, current regulations would not allow development without adequate utility capacity, including wastewater treatment capacity. Potential future development projects would be reviewed by the City and LACSD to determine that sufficient capacity exists to serve the development.

The Certified EIR concluded that for the reasons stated above, adequate wastewater treatment capacity would exist to treat growth anticipated under the General Plan Update in addition to LACSD's existing commitments. Therefore, the impact with respect to wastewater treatment capacity would be less than significant.

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

As discussed in the Certified EIR, the City receives refuse pickup and disposal service from Waste Resources and EDCO Disposal and Waste Management Services. Once collected from areas within the City, the majority of refuse (88 percent) is delivered to H.M

Holloway Inc., El Sobrante, and Chiquita Canyon landfills. According to CalRecycle, the H.M. Holloway Inc. Landfill has a remaining capacity of approximately seven million tons, and is expected to remain in operation until 2030, the El Sobrante Landfill has a remaining capacity of about 144 million tons, and it is expected to remain in operation until 2051, and the Chiquita Canyon Sanitary landfill has a remaining capacity of 60 million tons and is expected to remain in operation until 2047.

In 2019, the most recent year data was available, Carson disposed about 14.1 pounds per resident per day (PPD) of waste to landfills. Although the annual per capital disposal rate has been increasing since 2014, both the per resident and per employee disposal rates are less than their respective targets calculated by CalRecycle (19.3 and 37.3, respectively, as of June 2021) Using a PPD disposal rate of 14.1 and a projected increase in population of 43,600, it is estimated that a total increase of 614,760 PPD or 112,194 tons per year would be disposed of at buildout of the General Plan Update. Therefore, although H.M. Holloway Inc. Landfill is expected to remain open until 2030 and would close prior to the anticipated buildout of the General Plan Update, solid waste generated under the update would reasonably be within the capacity of other facilities serving the City. For example, the 112,194 tons per day generated by the increase in population under the General Plan Update represents 0.1 and 0.2 percent of remaining capacity of the El Sobrante and Chiquita Canyon landfills, respectively.

The LACPWD prepares and administers the Countywide Integrated Waste Management Plan (IWMP). For the current planning period from 2017 to 2032, the IWMP Annual Report estimates that a shortfall in permitted solid waste disposal capacity is not anticipated for the County. The IWMP also states that the cumulative need at the County level for Class III landfill disposal capacity, approximately 126.4 million tons in 2032, will not exceed the 2017 remaining permitted Class III landfill capacity of 167.6 million tons.

Given the remaining capacity at currently landfills serving the City and the County's ability to meet its disposal targets, meeting the collection, transfer, recycling, and disposal needs of the General Plan Update would not result in adverse impacts on landfill facilities. It is also likely that changes in regulations will occur that will decrease the need for landfill capacity through new recycling measures (e.g., conversion technology facilities, material recovery facilities, waste resource projects). Compliance with solid waste regulations and General Plan Update policies that promote recycling would further address potential impacts.

The Certified EIR concluded that for the reasons stated above, growth anticipated under the General Plan Update would not 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. Therefore, the impact with respect to solid waste disposal capacity would be less than significant.

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

As discussed in the Certified EIR, AB 939 mandated that California generate a 25 percent diversion rate by 1995 and a 50 percent diversion rate by 2000. AB 341, adopted in 2012, requires that commercial enterprises that generate four cubic yards or more of solid waste and multi-family housing complexes of five units or more weekly participate in recycling programs in order to meet California's goal to recycle 75 percent of its solid waste by 2020. SB 1383, adopted in 2016, establishes goals of 50 percent organics waste reduction by 2020 and 75 percent reduction by 2025.

Development under the General Plan Update would be required to comply with federal, state, and local statutes and regulations related to solid waste. Furthermore, the policies included on pages 3.17-21 through 3.17-23 for the General Plan Update require the City to expand educational outreach about solid waste reduction and recycling programs and to divert 75 percent (or more) of waste from landfills by 2022 and maintain a diversion rate of 75 percent or greater through 2040. For these reasons, growth anticipated under the General Plan Update would comply with federal, state, and local management and reduction statutes and regulations related to solid waste. Therefore, the Certified EIR concluded the impact with respect to solid waste regulations would be less than significant.

3.19.2 Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

(a) Would the Project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities or expansion of existing facilities, the construction of which could cause significant environment effects?

Construction of Water Treatment Facilities

The Project Site is located in an urban area and is currently undeveloped. The Modified Project includes development of an infill site with 62 residential dwelling units, allowed under the existing zoning and land use designation for the site, as amended by the General Plan Amendment and Specific Plan Amendment that are part of the Modified Project. The Modified Project would increase the demand for water treatment.

The Modified Project would help the City meet its RHNA obligation of 5,618 new housing units and as such, the Modified Project's population increase would fall within the net service population increase of 43,600 residents by 2040 considered in the impact analysis in the Certified EIR and would not create a demand for water treatment not already contemplated in the Certified EIR. Additionally, the Certified EIR concluded that with an excess treatment capacity of 296 MGD, the F.E. Weymouth has sufficient remaining capacity to treat the full increase in water attributable to growth anticipated under the General Plan Update. Further, the Modified Project would be required to implement

policies in the General Plan Update that aim to conserve water through public education programs and the promotion of water conserving devices and practices in new construction. Such policies would help to reduce the demand on existing water treatment infrastructure and allow for meaningful consideration of potential impacts of any future decisions regarding the provision of new infrastructure. Thus, the Modified Project would not require or result in the relocation or construction of new or expanded water treatment facilities, the construction of which could cause significant environment effects. Therefore, the Modified Project would not result in new or increased significant impacts beyond those identified in the Certified EIR.

Construction of Wastewater Treatment Facilities

The Project Site is located in an urban area and is currently undeveloped. The Modified Project includes development of an infill site with 62 residential dwelling units, allowed under the existing zoning and land use designation for the site, as amended by the General Plan Amendment and Specific Plan Amendment that are part of the Modified Project. The Modified Project would increase the demand for wastewater treatment.

The Modified Project would help the City meet its RHNA obligation of 5,618 new housing units and as such, the Modified Project's population increase would fall within the net service population increase of 43,600 residents by 2040 considered in the impact analysis in the Certified EIR and would not create a demand for wastewater treatment not already contemplated in the Certified EIR. Additionally, the Certified EIR concluded that Joint Water Pollution Control Plant has sufficient remaining capacity to treat the full increase in sewage attributable to growth anticipated under the General Plan. Additionally, the Modified Project would be required to implement the policies included on pages 3.17-21 through 3.17-23 for the General Plan Update that aim to conserve water by curbing demand for domestic and commercial purposes and promoting water conservation strategies, thus reducing demand for water, and in turn, the generation of wastewater. Thus, the Modified Project would not require or result in the relocation or construction of new or expanded wastewater treatment facilities, the construction of which could cause significant environment effects. Therefore, the Modified Project would not result in new or increased significant impacts beyond those identified in the Certified EIR.

Construction of Storm Drainage Facilities

As discussed in response to question 3.10(c.iii) (Hydrology and Water Quality – Storm Drain Capacity), in its existing condition, the Project Site is undeveloped. During storm events, water is either absorbed into the upper levels of the soil at the site and/or flows across the site to the local storm drain. During both the Modified Project's construction and operational phases, the Modified Project would be required to comply with the City's Floodplain Management and Stormwater and Urban Runoff Pollution Control Ordinances and the City's hydrology requirements, which protect water quality and control runoff rates and volumes to ensure that the existing storm drain capacity can accommodate the Project's runoff. Thus, the Modified Project would not require or result in the relocation or

construction of new or expanded storm drain facilities, the construction of which could cause significant environment effects. Therefore, the Modified Project would not result in new or increased significant impacts beyond those identified in the Certified EIR.

Construction of Electrical Facilities

The Project Site is located in an urban area and is currently undeveloped. The Modified Project includes development of an infill site with 62 residential dwelling units, allowed under the existing zoning and land use designation for the site, as amended by the General Plan Amendment and Specific Plan Amendment that are part of the Modified Project. The Modified Project would increase the demand on electricity facilities.

The Modified Project would help the City meet its RHNA obligation of 5,618 new housing units and as such, the Modified Project's population increase would fall within the net service population increase of 43,600 residents by 2040 considered in the impact analysis in the Certified EIR and would not create a demand for electricity facilities not already contemplated in the Certified EIR.

The Certified EIR concluded that new development would be subject to the CALGreen code, which establishes mandatory energy efficiency measures for new residential buildings. Compliance with current CALGreen requirements and General Plan policies that promote renewable energy generation and energy efficiency would ensure that new development associated with the implementation of the General Plan Update would be energy efficient, thus reducing the need for new electrical power infrastructure. Thus, the Modified Project would not require or result in the relocation or construction of new or expanded electricity facilities, the construction of which could cause significant environment effects. Therefore, the Modified Project would not result in new or increased significant impacts beyond those identified in the Certified EIR.

Construction of Natural Gas Facilities

The Project Site is located in an urban area and is currently undeveloped. The Modified Project includes development of an infill site with 62 residential dwelling units, allowed under the existing zoning and land use designation for the site, as amended by the General Plan Amendment and Specific Plan Amendment that are part of the Modified Project. The Modified Project would increase the demand on natural gas facilities.

The Modified Project would help the City meet its RHNA obligation of 5,618 new housing units and as such, the Modified Project's population increase would fall within the net service population increase of 43,600 residents by 2040 considered in the impact analysis in the Certified EIR and would not create a demand for natural gas facilities not already contemplated in the Certified EIR.

The Certified EIR concluded that SoCalGas projects that total gas demand in its service area would decline at an annual rate of one percent from 2020–2035 due to modest economic growth and CPUC-mandated energy efficiency standards and projects. Additionally, all new development (including the Modified Project) would be subject to

energy efficiency standards contained in the CALGreen code, thus reducing the need for new natural gas infrastructure. Thus, the Modified Project would not require or result in the relocation or construction of new or expanded natural gas facilities, the construction of which could cause significant environment effects. Therefore, the Modified Project would not result in new or increased significant impacts beyond those identified in the Certified EIR.

Construction of Telecommunications Facilities

The Project Site is located in an urban area and is currently undeveloped. The Modified Project includes development of an infill site with 62 residential dwelling units, allowed under the existing zoning and land use designation for the site, as amended by the General Plan Amendment and Specific Plan Amendment that are part of the Modified Project. The Modified Project would increase the demand on telecommunications facilities.

The Modified Project would help the City meet its RHNA obligation of 5,618 new housing units and as such, the Modified Project's population increase would fall within the net service population increase of 43,600 residents by 2040 considered in the impact analysis in the Certified EIR and would not create a demand for telecommunications facilities not already contemplated in the Certified EIR.

The Certified EIR concluded that it is possible that development proposed under the General Plan could result in the provision of new telecommunication facilities. Should upgrades to telecommunication infrastructure be required, construction of those facilities could result in adverse environmental effects. As all new telecommunication infrastructure could be provided within and immediately surrounding the Planning Area, the potential impacts of these improvements are considered throughout the technical sections of the Certified EIR. In addition, future facilities would be required to comply with the City's requirements for construction projects, including but not limited to, grading permits and encroachment permits. Thus, the Modified Project would not require or result in the relocation or construction of new or expanded telecommunications facilities, the construction of which could cause significant environment effects. Therefore, the Modified Project would not result in new or increased significant impacts beyond those identified in the Certified EIR.

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

The Project Site is located in an urban area and is currently undeveloped. The Modified Project includes development of an infill site with 62 residential dwelling units, allowed under the existing zoning and land use designation for the site, as amended by the General Plan Amendment and Specific Plan Amendment that are part of the Modified Project. The Modified Project would increase the demand for water supply.

The Modified Project would help the City meet its RHNA obligation of 5,618 new housing units and as such, the Modified Project's population increase would fall within the net service population increase of 43,600 residents by 2040 considered in the impact analysis in the Certified EIR and would not create a demand for water supply not already contemplated in the Certified EIR.

The Certified EIR stated that it is expected that there will be sufficient water supplies available to serve the development associated with the General Plan Update from existing entitlements and resources, and Cal Water and GSW will be required to account for General Plan growth during the next UWMP update cycle in 2025. Furthermore, as with all new development in the City, the Modified Project would also be subject to water conservation standards contained in the CALGreen code and policies included on pages 3.17-21 through 3.17-23 for General Plan Update that will reduce the overall existing and future water usage in the City. Finally, in the event of a water shortage, Cal Water and GSW would rely on their Water Shortage Contingency Plans (WSCP), which are to be engaged in the case of a water shortage event, such as a drought or supply interruption. Thus, the Modified Project would not have insufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years. Therefore, the Modified Project would not result in new or increased significant impacts beyond those identified in the Certified EIR.

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

The Project Site is located in an urban area and is currently undeveloped. The Modified Project includes development of an infill site with 62 residential dwelling units, allowed under the existing zoning and land use designation for the site, as amended by the General Plan Amendment and Specific Plan Amendment that are part of the Modified Project. The Modified Project would increase the demand for wastewater treatment.

The Modified Project would help the City meet its RHNA obligation of 5,618 new housing units and as such, the Modified Project's population increase would fall within the net service population increase of 43,600 residents by 2040 considered in the impact analysis in the Certified EIR and would not create a demand for wastewater treatment not already contemplated in the Certified EIR. Additionally, the Certified EIR concluded that Joint Water Pollution Control Plant has sufficient remaining capacity to treat the full increase in sewage attributable to growth anticipated under the General Plan. Additionally, the Modified Project would be required to implement the policies included on pages 3.17-21 through 3.17-23 for the General Plan Update that aim to conserve water by curbing demand for domestic and commercial purposes and promoting water conservation strategies, thus reducing demand for water, and in turn, the generation of wastewater. Thus, the Modified Project would not require or result in the relocation or construction of new or expanded wastewater treatment facilities, the construction of which could cause

significant environment effects. Therefore, the Modified Project would not result in new or increased significant impacts beyond those identified in the Certified EIR.

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

The Project Site is located in an urban area and is currently undeveloped. The Modified Project includes development of an infill site with 62 residential dwelling units, allowed under the existing zoning and land use designation for the site, as amended by the General Plan Amendment and Specific Plan Amendment that are part of the Modified Project. The Modified Project would increase the demand for landfill capacity.

The Modified Project would help the City meet its RHNA obligation of 5,618 new housing units and as such, the Modified Project's population increase would fall within the net service population increase of 43,600 residents by 2040 considered in the impact analysis in the Certified EIR and would not create a demand for landfill capacity not already contemplated in the Certified EIR.

The Certified EIR stated that given the remaining capacity at currently landfills serving the City and the County's ability to meet its disposal targets, meeting the collection, transfer, recycling, and disposal needs of the General Plan Update would not result in adverse impacts on landfill facilities. It is also likely that changes in regulations will occur that will decrease the need for landfill capacity through new recycling measures (e.g., conversion technology facilities, material recovery facilities, waste resource projects). Compliance with solid waste regulations and policies included on pages 3.17-21 through 3.17-23 for the General Plan Update that promote recycling would further reduce the Modified Project's solid waste generation. Thus, the Modified Project would not 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. Therefore, the Modified Project would not result in new or increased significant impacts beyond those identified in the Certified EIR.

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

The Modified Project would be required to comply with the City's recycling requirements. Therefore, the Modified Project would not result in new or increased significant impacts beyond those identified in the Certified EIR.

3.19.3 Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

No. As discussed above, the Modified Project would not result in any new or more severe significant impacts beyond what were identified in the Certified EIR.

3.19.4 Any New Information Requiring New Analysis or Verification?

No. There is no new information requiring new analysis or verification.

3.19.5 EIR's Mitigation Measures Addressing Impact

None required.

3.19.6 Conclusion

As discussed above, the Modified Project would not result in any of the conditions set forth in PRC Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Supplemental or Subsequent EIR.

3.20 WILDFIRE

Issues (and supporting Information Sources)	Impact Determination in EIR	Any Substantial Changes Involving New Significant Impacts or Substantially More Severe Impacts?	Any Substantially Changed Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information of Substantial Importance?	EIR's Mitigation Measures Addressing Impact
WILDFIRE: If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:					
(a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	No Impact	No	No	No	No
(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	No	No	No	No
(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	No	No	No	No
(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 change?	No Impact	No	No	No	No

Impacts related to wildfire are discussed in the Certified EIR on pages 5-3 and 5-4.

3.20.1 Impact Determination in the EIR

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

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

(c) Would the Project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines

or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

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

Questions (a) through (d) were addressed together in the Certified EIR.

As discussed in the Certified EIR, California Department of Forestry and Fire Protection (CAL FIRE) provides maps of the State Responsibility Area (SRA) Fire Hazard Severity Zones (FHSZs), or areas of significant fire hazard, based on fuels, terrain, weather, and the likelihood of buildings igniting. CAL FIRE Zones are designated with Very High, High, Moderate, and Other which includes Non-Wildland/Urban and Urban Unzoned hazard classes. The goal of this mapping effort is to create more accurate fire hazard zone designations such that mitigation strategies are implemented in areas where hazards warrant these investments. The fire hazard zones will provide specific designation for application of defensible space and building standards consistent with known mechanisms of fire risk to people, property, and natural resources.

The Planning Area is not located within or near an SRA nor is it classified as a very high fire hazard severity zone (VHFHSZ) or located near a VHFHSZ.4 The Planning Area is located within a Local Responsibility Area (LRA) in a highly urbanized environment that is far from areas with high wildfire risk. Therefore, wildfire risk in the Planning Area is negligible. The Certified EIR concluded that no impacts would occur.

3.20.2 Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

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

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

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

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

As with the Certified EIR, questions (a) through (d) were addressed together in the Certified EIR.

The Project Site is not in or near a state responsibility area or lands classified as very high fire hazard severity zone. Therefore, the impact with respect to wildfire hazards would be less than significant.

3.20.3 Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

No. As discussed above, the Modified Project would not result in any new or more severe significant impacts beyond what were identified in the Certified EIR.

3.20.4 Any New Information Requiring New Analysis or Verification?

No. There is no new information requiring new analysis or verification.

3.20.5 EIR's Mitigation Measures Addressing Impact

None required.

3.20.6 Conclusion

As discussed above, the Modified Project would not result in any of the conditions set forth in PRC Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Supplemental or Subsequent EIR.

4 ADDENDUM CONCLUSION

As demonstrated by the discussion above, impacts associated with the Modified Project would be similar to or less than the impacts addressed in the Certified EIR. No substantial changes would occur with respect to the circumstances under which the Modified Project is undertaken that will require major revisions of the Certified EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects. In addition, no new information of substantial importance has become available relative to any of the environmental topic categories that would result in in new or more severe significant environmental impacts. In addition, the applicable mitigation measures included as part of the Certified EIR would continue to be implemented under the Modified Project. As all of the impacts of the Modified Project would be within the envelope of impacts analyzed in the Certified EIR, none of the conditions described in PRC Section 21166 and CEQA Guidelines Sections 15162 and 15163 requiring a Supplemental or Subsequent EIR would occur. Additionally, there are no known mitigation measures or project alternatives that were previously considered infeasible but are now considered feasible that would substantially reduce one or more significant effects on the environment identified in the Certified EIR. Therefore, the Modified Project would not create any potential adverse impacts beyond those evaluated in the Certified EIR. As such, the preparation of an addendum is appropriate and fully complies with the requirements of PRC Section 21166 and CEQA Guidelines Sections 15162, 15163, and 15164.

ATTACHMENTS

A. Air Quality Report
B. Biological Resources Assessment
C. Geotechnical Investigation
D. GHG Emissions Report
E. Noise Report
F. Vibration Report
G. Traffic Memo

ATTACHMENT A
AIR QUALITY REPORT

ATTACHMENT B
BIOLOGICAL RESOURCES REPORT

ATTACHMENT D
GHG EMISSIONS REPORT

ATTACHMENT E
NOISE REPORT

ATTACHMENT F
VIBRATION REPORT

ATTACHMENT G
TRAFFIC MEMO