DRAFT

Initial Study and Mitigated Negative Declaration
KL Fenix Cargo Container Parking Specific Plan

Prepared for:

City of Carson
701 East Carson Street
Carson, California 90745
Contact: Manraj Bhatia, Assistant Planner

Prepared by:

DUDEK

27372 Calle Arroyo
San Juan Capistrano, California 92675
Contact: Collin Ramsey, Senior Project Manager

APRIL 2020

EXHIBIT NO. 12

Printed on 30% post-consumer recycled material.

Table of Contents

APPENDICES

FIGURES

TABLES

Acronyms and Abbreviations

Acronym/Abbreviation	Definition
AB	Assembly Bill
AQMP	Air Quality Management Plan
BMP	best management practice
CAAQS	California Ambient Air Quality Standards
CAL FIRE	California Department of Forestry and Fire Protection
Cal Water	California Water Service
CalEEMod	California Emissions Estimator Model
CalGreen	California Green Building Standards
Caltrans	California Department of Transportation
CAP	Climate Action Plan
CARB	California Air Resources Board
CEQA	California Environmental Quality Act
CH_4	methane
City	City of Carson
CMP	Congestion Management Plan
CO	carbon monoxide
CO_2	carbon dioxide
CO_2e	carbon dioxide equivalent
County	County of Los Angeles
CRHR	California Register of Historical Resources
dB	decibel
dBA	A-weighted decibel
DTSC	Department of Toxic Substances Control
EIR	environmental impact report
EMFAC	Mobile Source Emissions Inventory Model
EO	Executive Order
EPA	U.S. Environmental Protection Agency
FHSZ	fire hazard severity zone
GHG	greenhouse gas
GWP	global warming potential
HMCP	hazardous materials contingency plan
HRA	health risk assessment
HVAC	heating, ventilation and air conditioning
I	Interstate
IS	initial study
ITE	Institute of Transportation Engineers
JWPCP	Joint Water Pollution Control Plant
LACoFD	Los Angeles County Fire Department
L_{eq}	equivalent continuous sound level
LST	localized significance threshold
MM	Mitigation Measure
MND	mitigated negative declaration
MT	metric ton
N_2O	nitrous oxide

Acronym/Abbreviation	Definition
NAAQS	National Ambient Air Quality Standards
NO_x	oxides of nitrogen
NO_2	nitrogen dioxide
NPDES	National Pollutant Discharge Elimination System
NRHP	National Register of Historic Resources
O_3	ozone
OPR	Office of Planning and Research
PCE	passenger-car equivalent
$PM_{2.5}$	particulate matter with an aerodynamic diameter less than or equal to 2.5 microns
PM_{10}	particulate matter with an aerodynamic diameter less than or equal to 10 microns
PRC	California Public Resources Code
RAP	remedial action plan
RCNM	Roadway Construction Noise Model
RTP/SCS	Regional Transportation Plan/Sustainable Communities Strategy
SB	Senate Bill
SCAB	South Coast Air Basin
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCCIC	South Central Coastal Information Center
SO_x	sulfur oxides
SWPPP	stormwater pollution prevention plan
TAC	toxic air contaminant
UWMP	Urban Water Management Plan
VMT	vehicle miles traveled
VOC	volatile organic compound

1 Introduction

1.1 Project Overview

The City of Carson (City) received a development application from KL Fenix Corporation (applicant) requesting the approval of the following discretionary actions for the proposed KL Fenix Cargo Container Specific Plan (project):

- Conditional Use Permit (CUP 1074-2018)
- Site Plan and Design Review (DOR 1745-2018)
- General Plan Amendment (GPA 108-2018)
- KL Fenix Cargo Container Parking Specific Plan (SP 18-2018)
- Development Agreement (DA 23-2018)

The approximately 14.3-acre project site is currently vacant, undeveloped land. The project involves the construction and operation of a cargo container parking facility, which would be used to mobilize both imported and exported goods that pass through the Ports of Los Angeles and Long Beach. The project would include an approximately 53,550-square-foot warehouse and office building on the eastern part of the project site. In addition, the project would include approximately 115 parking spaces for passenger vehicles, 400 spaces for cargo containers, 75 spaces for truck parking, and 6 loading docks.

The project is subject to analysis pursuant to the California Environmental Quality Act (CEQA). In accordance with CEQA Guidelines Section 15367, the City is the lead agency with principal responsibility for considering the project for approval (14 CCR 15000 et seq.).

1.2 California Environmental Quality Act Compliance

CEQA, a statewide environmental law contained in California Public Resources Code (PRC), Sections 21000–21177, applies to most public agency decisions to carry out, authorize, or approve actions that have the potential to adversely affect the environment (PRC Section 21000 et seq.). The overarching goal of CEQA is to protect the physical environment. To achieve that goal, CEQA requires that public agencies identify the environmental consequences of their discretionary actions and consider alternatives and mitigation measures that could avoid or reduce significant adverse impacts when avoidance or reduction is feasible. It also gives other public agencies and the public an opportunity to comment on the project. If significant adverse impacts cannot be avoided, reduced, or mitigated to below a level of significance, the public agency is required to prepare an environmental impact report (EIR) and balance the project's environmental concerns with other goals and benefits in a statement of overriding considerations.

In accordance with the CEQA Guidelines, the City, as the lead agency, has prepared an initial study (IS) to evaluate potential environmental effects and to determine whether an EIR, a negative declaration, or a mitigated negative declaration (MND) should be prepared for the project. CEQA Guidelines Section 15070(b) provides that an MND should be prepared for a project when the IS has identified potentially significant environmental impacts associated with the project, but (1) revisions to the project's plans or proposals made or agreed to by the applicant before release of an MND for public review would avoid or mitigate environmental effects to a point where no significant effect on

the environment would occur and (2) there is no substantial evidence in the record before the public agency that the project, as revised, may have a significant effect on the environment. The IS determined that implementation of the project would result in no impacts or less-than-significant impacts with incorporation of mitigation. Therefore, the City has prepared an MND for the project.

1.3 Preparation and Processing of this Initial Study

The City's Community Development Department, Planning Division, directed and supervised preparation of this IS/MND. Although prepared with assistance from the consulting firm Dudek, the content contained and the conclusions drawn within this IS/MND reflect the independent judgment of the City.

1.4 Initial Study Checklist

Dudek, under the City's guidance, prepared the project's Environmental Checklist (i.e., IS) per CEQA Guidelines Sections 15063–15065. The CEQA Guidelines include a suggested checklist to indicate whether a project would have an adverse impact on the environment. The checklist can be found in Section 3, Initial Study Checklist, of this document. Following the Environmental Checklist, Sections 3.1 through 3.21 include an explanation and discussion of each significance determination made in the checklist for the project.

For this IS/MND, one of the following four responses is possible for each environmental issue area:

1. Potentially Significant Impact
2. Less-Than-Significant Impact with Mitigation Incorporated
3. Less-Than-Significant Impact
4. No Impact

The checklist and accompanying explanations of checklist responses provide the information and analysis necessary to assess relative environmental impacts of the project. In doing so, the City determined no further environmental review was necessary for the project.

1.5 Public Review Process

As specified by the CEQA Guidelines, the project's Notice of Intent was circulated for a 30-day public review period (14 CCR 15082[b]) to agencies with concern or with jurisdiction over resources affected by the project. The Notice of Intent has been provided to the State Clearinghouse, Clerk of the County of Los Angeles, responsible agencies, and interested organizations and individuals.

Reviewers of the IS/MND are given a 30-day public review period to prepare written comments on the IS/MND. During the public review period, the IS/MND, including the technical appendices, is available for review at the following locations:

- City of Carson website: http://ci.carson.ca.us/communitydevelopment/planningprojects.aspx

In reviewing the IS/MND, affected public agencies and interested members of the public should focus on the adequacy of the document in identifying and analyzing the potential environmental impacts. Comments on the IS/MND and the analysis contained herein may be sent to:

Manraj Bhatia, Assistant Planner
City of Carson
Community Development Department, Planning Division
701 East Carson Street
Carson, California 90745
310.952.1761, ext. 1768
mbhatia@carson.ca.us

INTENTIONALLY LEFT BLANK

2 Project Description

2.1 Project Location

The project site is located in the western portion of the City, which is located in the South Bay/Harbor region of the County of Los Angeles (County). Regionally, the City is bordered by the cities of Long Beach, Compton, Torrance, and Los Angeles. In addition, unincorporated County land borders the City on the northwest. Locally, the project site is immediately bounded by Main Street to the east, existing commercial and office development to the south, Figueroa Street to the west, and a stormwater culvert and industrial/self-storage operation to the north (Figure 1, Project Location). The project site consists of a single parcel (Assessor's Parcel Number 7336-003-043). The address associated with the project site is 20601 South Main Street, Carson, California 90745.

2.2 Environmental Setting

City of Carson

The City is approximately 19 square miles in the South Bay/Harbor region of the County. Generally, the City is an urban community with a broad mix of land uses, including housing, commercial, office, industrial park, open space, and public-serving uses. The City is primarily built-out and relatively flat, with most elevations ranging from 20 to 40 feet. The northwest and southeast portions of the City are generally industrial uses. Residential uses are generally located on the southwest and northeast portions of the City. Commercial uses are concentrated along Interstate (I) 405.

Carson is surrounded by the City of Los Angeles to the northwest, south, and southeast. The City of Compton is adjacent to the northeast, and the City of Long Beach is adjacent to the east. The City of Carson is also close to the Ports of Los Angeles and Long Beach, approximately 2 to 3 miles to the south. There are four freeways that provide direct access to Carson: I-405 (San Diego Freeway), which bisects the City in an east–west direction; I-710 (Long Beach Freeway), which forms a portion of the eastern border of Carson; State Route 91 (Redondo Beach/Artesia Freeway) in the northern portion of the City; and I-110 (Harbor Freeway), which forms much of the western border of the City (City of Carson 2002).

Existing Project Site

The 14.3-acre project site is currently comprised of vacant land located directly east to the I-110 Figueroa on- and off-ramps. The project parcel was the location of the former Gardena Valley Landfill No. 1 & 2. The Gardena Valley Landfill No. 1 & 2 operated from 1956 until 1959 and accepted approximately 75% residential municipal waste and 25% construction or industrial wastes. The industrial wastes allowed included crude oil-related wastes (crude oil and tank bottoms), paint sludge, auto wash sludge, latex, molasses, cutting oil, and other semi-liquids. The average thickness of the waste materials was found to be approximately 25 feet. The former landfill was capped with approximately 5 feet of soil (refer to the Preliminary Environmental Evaluation [Appendix C] and Section 3.9, Hazards and Hazardous Materials, for further discussion regarding the former landfill use).

The project site is zoned ML-ORL-D (Manufacturing, Light with Organic Refuse Landfill and Design overlays) with a General Plan Land Use Designation of Mixed Use – Business Park (City of Carson 2017).

Surrounding Land Uses

The project site is bounded by Main Street to the east, existing commercial and office development and Torrance Boulevard to the south, Figueroa Street and I-110 to the west, and a stormwater culvert, industrial/self-storage operation, and Del Amo Boulevard to the north (Figure 2, Surrounding Land Uses).

2.3 Proposed Project

KL Fenix Cargo Container Project

The principal purpose of the project is for transferring goods and breaking down and assembling tractor-trailer transportation. On-site operational activities would include the mobilization of either imported goods that have just arrived from the Ports of Los Angeles and Long Beach or exported goods that are in transit to the Ports. The primary route for the trucks transporting the imported and exported goods to and from the project site would be I-110, located just west of the site. Site access would be provided via one 30-foot wide driveway located along Main Street and two existing driveways located along Figueroa Street.

The project will include an approximately 53,550-square-foot, 42-foot-tall warehouse/office building on the eastern part of the project site. This building will include approximately 39,500 square feet of warehouse space and 14,050 square feet of office use within an attached two-story office building. The project will include 115 parking spaces for passenger vehicles, 400 spaces for cargo containers, 75 spaces for truck parking, 6 loading docks, and designated exterior and interior areas for the unloading and loading of goods between containers (Figure 3, Site Plan).

The City is requiring the warehouse/office buildings' architecture to include large areas of glass along the street frontages and areas visible from the public right-of-way in order to give an appearance of an office building. In addition, a minimum 8-foot-tall solid wall will be constructed along Main Street, Figueroa Street, and both the southern and northern property lines, and a minimum 25-foot-wide landscape setback will be provided on Main Street and a minimum 20-foot-wide landscape setback will be provided on Figueroa Street.

The unloading and reloading of contents of one trailer to another trailer would be permitted on the project site; however, the maintenance of truck tractors and equipment, placing of containers on ground, as well as the exterior storage of stacked containers, would not be allowed on the project site. No truck access will be provided to and from Main Street (passenger vehicle access only), and Torrance Boulevard and Main Street will not be used by project trucks. Hours of operation for the office uses will be 8:00 a.m. to 6:00 p.m. Monday through Friday, 8:00 a.m. to 5:00 p.m. on Saturdays, and closed on Sundays. The cargo container parking operations will be allowed 6:00 a.m. to 2:00 a.m. Monday through Friday and 6:00 a.m. to 6:00 .p.m. on Saturdays (closed on Sundays).

Remediation Activities and Project Construction

The project site was the location of the former Gardena Valley Landfill No. 1 & 2. The Gardena Valley Landfill No. 1 & 2 operated from 1956 until 1959 and accepted approximately 75% residential municipal waste and 25% construction or industrial wastes. The former landfill was capped with approximately 5 feet of soil (refer to the Preliminary Environmental Evaluation [Appendix D]).

Soil, landfill gas, landfill liquids, and groundwater on the project site have contained concentrations of contaminants above screening levels. A remedy for the landfill was chosen in the 1990s; however, it was never implemented. Land use restrictions were applied to the project site in 1989 that require Department of Health Services (now Department of Toxic Substances Control [DTSC]) approval of any excavation or construction of buildings at the project site.

Several previous investigations, including remedial investigations and feasibility studies for the waste and groundwater, human health risk assessment, and a remedial action plan (RAP) for the former landfill waste were completed. The RAP for the waste proposed the construction of a cover and the addition of a landfill gas collection system and flare. The remedial design document to implement the RAP was prepared in 1999; however, to date, closure of the landfill in accordance with the 1999 Remedial Design and other remedial documents (e.g., the groundwater remedial investigation and feasibility study) has not occurred.

In 2019, the project applicant entered into a voluntary oversight agreement with the DTSC to review the existing environmental documents for the project site and to provide opinions on the site remediation needed in order to comply with the requirements of the land use restrictions and complete the project. DTSC oversight is currently ongoing and the applicant and DTSC are continuing to coordinate on the exact means, methods, and scope of on-site remediation activities.

Remediation and construction activities would occur within a single continuous phase starting in or around 2020. Subphases associated with these activities would include site preparation, fine grading and utility excavation (to depths allowed per the RAP), building construction, and paving. For a breakdown of construction sub-phases and schedule, refer to the California Emissions Estimator Model (CalEEMod) air quality modeling outputs provided in Appendix A.[1]

2.4 Project Approvals

- Conditional Use Permit (CUP 1074-2018)
- Site Plan and Design Review (DOR 1745-2018)
- General Plan Amendment (GPA 108-2018)
- KL Fenix Cargo Container Parking Specific Plan (SP 18-2018)
- Development Agreement (DA 23-2018)
- Remedial Action Plan, Explanation of Significance Differences, or Equivalent via DTSC

[1] Construction phasing estimates are based on default assumptions provided in CalEEMod (Appendix A). These assumptions are based on the size of the project site, the proposed land use, and the size of the planned improvements.

INTENTIONALLY LEFT BLANK

3 Initial Study Checklist

1. **Project title:**

   KL Fenix Cargo Container Parking Specific Plan

2. **Lead agency name and address:**

   City of Carson
   Community Development Department, Planning Division
   701 East Carson Street
   Carson, California 90745

3. **Contact person and phone number:**

   Manraj Bhatia, Assistant Planner
   310.952.1761, ext. 1768
   mbhatia@carson.ca.us

4. **Project location:**

   The project site consists of a single parcel (Assessor's Parcel Number 7336-003-043). The address associated with the project site is 20601 South Main Street, Carson, California 90745.

5. **Project sponsor's name and address:**

   KL Fenix Corporation
   19401 S Main Street, Suite 301
   Carson, California 90248

6. **General plan designation:**

   Mixed Use – Business Park

7. **Zoning:**

   ML-ORL-D (Manufacturing, Light with Organic Refuse Landfill and Design overlays)

8. **Description of project. (Describe the whole action involved, including but not limited to later phases of the project, and any secondary, support, or off-site features necessary for its implementation. Attach additional sheets if necessary):**

   The project involves the construction and operation of a cargo container parking facility, which would be used to mobilize both imported and exported goods that pass through the Ports of Los Angeles and Long Beach. The project would include an approximately 53,550-square-foot warehouse and office building on the eastern part of the project site. In addition, the project would include approximately 115 parking spaces for passenger vehicles, 400 spaces for cargo containers, 75 spaces for truck parking, and 6 loading docks.

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

The project site is bounded by Main Street to the east, existing commercial and office development and Torrance Boulevard to the south, Figueroa Street and I-110 to the west, and a stormwater culvert, industrial/self-storage operation, and Del Amo Boulevard to the north.

10. **Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement):**

No discretionary approvals from other public agencies are required.

11. **Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?**

Refer to Section 3.18, Tribal Cultural Resources.

Environmental Factors Potentially Affected

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact," as indicated by the checklist on the following pages.

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

Determination (To be completed by the Lead Agency)

On the basis of this initial evaluation:

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

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

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

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

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

Saiid Naaseh-Shahry

Signature

4/9/2020

Date

Evaluation of Environmental Impacts

3.1 Aesthetics

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

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

No Impact. Scenic vistas and other important visual resources are typically associated with natural landforms such as mountains, foothills, ridgelines, and coastlines. The City of Carson's General Plan Open Space and Conservation Element categorizes the City's open space as either Recreational Open Space, such as parks and public golf courses, or General Open Space, which consists of utility transmission corridors, drainage and flood facilities, and the Goodyear Blimp Base Airport (City of Carson 2004).

The project, which involves the construction and operation of a cargo container parking facility, is located in a highly developed area of the City, surrounded by existing industrial, commercial, and residential uses and away from any substantial open space areas. The nearest open space area as identified by the City's General Plan is Carson Park, which is located approximately 0.6 miles southeast of the project site. Due to the distance between Carson Park and the project site, and the developed nature of the project area, the project would not be visible from this open space resource. Therefore, no impacts associated with scenic vistas would occur.

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

No Impact. There are no officially designated scenic highways in or within 15 miles of the City. According to the California Department of Transportation (Caltrans), the nearest eligible state scenic highway is the segment of State Route 1 (Pacific Coast Highway) located more than 5 miles southeast of the project site (Caltrans 2019). Due to the intervening urban environment and natural topography located between the project site and this eligible state scenic highway, development of the project would occur outside of the viewshed of this, and any other, designated scenic highway. Therefore, no impacts associated with state scenic highways would occur.

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

Less-Than-Significant Impact. The scenic quality of new development is governed through the General Plan policies and Zoning Ordinance regulations, which include special provisions for site planning and design review. Approval of the project would require Site Plan and Design Review to ensure the project does not conflict with applicable zoning and other regulations governing scenic quality. This review would ensure that the project would comply with applicable development standards in the City's Zoning Ordinance, which would help ensure visual consistency with the existing character of the surrounding area. Therefore, impacts associated with applicable zoning and other regulations governing scenic quality would 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?

Less-Than-Significant Impact. Under the existing condition, off-site, project-adjacent light sources include streetlights and nighttime security lighting at neighboring industrial, commercial, and residential uses. While new on-site lighting would be required for safety and security reasons, the level of lighting would be consistent with the current level of nighttime lighting on and adjacent to the project site, and any new project lighting would not adversely alter existing nighttime views in the project area. Any new lighting would be required to comply with Section 9147, Exterior Lighting, of the Zoning Ordinance, which requires light sources to be shielded and oriented towards the project site and away from adjacent properties to avoid light trespass. Therefore, impacts associated with a new source of substantial light or glare would be less than significant.

3.2 Agriculture and Forestry Resources

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

a) Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

No Impact. According to the California Department of Conservation's California Important Farmland Finder, most of the County is not mapped under the Farmland Mapping and Monitoring Program, and, thus, does not contain Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (collectively "Important Farmland") (DOC 2016a). Therefore, no impacts associated with conversion of Important Farmland would occur.

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

No Impact. According the California Department of Conservation's Williamson Act 2015/2016 Map for Los Angeles County, the project site is not located on or adjacent to any lands under Williamson Act contract (DOC 2016b). In addition, neither the project site nor the surrounding area are zoned for agricultural uses. Therefore, no impacts associated with agricultural zoning or Williamson Act contracts would occur.

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

No Impact. According to the City's Zoning Map, the project site is not located on or adjacent to forestland, timberland, or timberland zoned Timberland Production (City of Carson 2004). Therefore, no impacts associated with forestland or timberland would occur.

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

No Impact. The project site is not located on or adjacent to forestland. No private timberlands or public lands with forests are located in the City. Therefore, no impact associated with the loss or conversion of forestland would occur.

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

No Impact. The project site is not located on or adjacent to any parcels identified as Important Farmland or forestland. In addition, the project site is disturbed, undeveloped land and would not would result in the indirect conversion of Important Farmland or forestland located away from the project site. Therefore, no impacts associated with the conversion of Farmland or forestland would occur.

3.3 Air Quality

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

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Expose sensitive receptors to substantial pollutant concentrations?	☐	☒	☐	☐
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

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

Less-Than-Significant Impact. The project site is located within the South Coast Air Basin (SCAB) under the jurisdiction of the South Coast Air Quality Management District (SCAQMD), which is the local agency responsible for administration and enforcement of air quality regulations for the area. The SCAQMD has established criteria for determining consistency with the Air Quality Management Plan (AQMP), currently the 2016 AQMP, in Chapter 12, Sections 12.2 and 12.3, in the SCAQMD CEQA Air Quality Handbook (SCAQMD 1993). The criteria are as follows (SCAQMD 1993):

1. **Consistency Criterion No. 1:** The project will not result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations, or delay the timely attainment of air quality standards of the interim emissions reductions specified in the AQMP.
2. **Consistency Criterion No. 2:** The project will not exceed the assumptions in the AQMP or increments based on the year of project buildout and phase.

Consistency Criterion No. 1

Section 3.3(b) evaluates the project's potential impacts in regards to CEQA Guidelines Appendix G Threshold 2 (will the project result in a cumulatively considerable new increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard). As discussed in Section 3.3(b), the project would not result in a significant and unavoidable impact associated with the violation of an air quality standard. Because the project would not result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations, the project would not conflict with Consistency Criterion No. 1 of the SCAQMD CEQA Air Quality Handbook.

Consistency Criterion No. 2

While striving to achieve the National Ambient Air Quality Standards (NAAQS) for ozone (O_3) and particulate matter with an aerodynamic diameter less than or equal to 2.5 microns ($PM_{2.5}$) and the California Ambient Air Quality Standards (CAAQS) for O_3, particulate matter with an aerodynamic diameter less than or equal to 10 microns (PM_{10}), and $PM_{2.5}$ through a variety of air quality control measures, the 2016 AQMP also accommodates planned growth in the SCAB. Projects are considered consistent with, and would not conflict with or obstruct implementation of, the AQMP if the growth in socioeconomic factors (e.g., population,

employment) is consistent with the underlying regional plans used to develop the AQMP (per Consistency Criterion No. 2 of the SCAQMD CEQA Air Quality Handbook).

The potential of the project to exceed the assumptions in the AQMP or increments based on the year of project buildout and phase is primarily assessed by determining consistency between the project's land use designations and its potential to generate population growth. In general, projects are considered consistent with, and not in conflict with or obstruct implementation of, the AQMP if the growth they produce in socioeconomic factors is consistent with the underlying regional plans used to develop the AQMP (SCAQMD 1993). The SCAQMD primarily uses demographic growth forecasts for various socioeconomic categories (e.g., population, housing, and employment by industry) developed by the Southern California Association of Governments (SCAG) for its 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) (SCAG 2016). SCAQMD uses this document, which is based on general plans for cities and counties in the SCAB, to develop the AQMP emissions inventory (SCAQMD 2017).[2] The SCAG RTP/SCS, and associated Regional Growth Forecast, are generally consistent with the local plans; therefore, the 2016 AQMP is generally consistent with local government plans.

The KL Fenix Cargo Container Parking Specific Plan (Specific Plan) is a regulatory tool to guide development in a local area consistent with the City's General Plan. While the General Plan provides the primary guide for growth and development citywide, the Specific Plan customizes the planning process to enhance and promote the unique characteristics of a special area. To ensure consistency between the Specific Plan and to the City's General Plan, the General Plan will be amended concurrent with adoption of this Specific Plan for the project. The corresponding General Plan amendment changes the current land-use designation to "Heavy, Manufacturing" land use designation for the Specific Plan area to replace the site's existing "Light Industrial" General Plan designation. As further discussed in Section 3.14, Population and Housing, the project would not stimulate population growth or population concentration above what is assumed in local and regional land use plans, and does not include either residential uses or the extension of roads or other infrastructure. As such, the project would not either directly or indirectly induce growth in the project region. In addition, the project would not conflict with an applicable land use plan, policy, or regulation of an agency with jurisdiction over the project, as further described in Section 3.11. Since the project is not anticipated to result in population or employment growth that would conflict with SCAG's projections, and would be consistent with the General Plan use designation and zoning for the proposed site, it would not conflict with or exceed the assumptions in the 2016 AQMP.

In summary, the project would not result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations, and would not conflict with Consistency Criterion No. 1. Implementation of the project would be not exceed the demographic growth forecasts in the SCAG 2016 RTP/SCS; therefore, the project would also be consistent with the SCAQMD 2016 AQMP, which based future emission estimates on the SCAG 2016 RTP/SCS. As such, the project would not conflict with

[2] Information necessary to produce the emissions inventory for the SCAB is obtained from the SCAQMD and other governmental agencies, including the California Air Resources Board, Caltrans, and SCAG. Each of these agencies is responsible for collecting data (e.g., industry growth factors, socioeconomic projections, travel activity levels, emission factors, emission speciation profile, and emissions) and developing methodologies (e.g., model and demographic forecast improvements) required to generate a comprehensive emissions inventory. SCAG incorporates these data into its Travel Demand Model for estimating/projecting vehicle miles traveled and driving speeds. SCAG's socioeconomic and transportation activities projections in their *2016–2040 Regional Transportation Plan/Sustainable Communities Strategy* are integrated in the 2016 AQMP (SCAQMD 2017a).

Consistency Criterion No. 2. Therefore, based on these considerations, impacts associated with conflicting with or obstructing implementation of an applicable air quality plan 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?

Less-Than-Significant Impact. A quantitative analysis was conducted to determine whether proposed activities might result in emissions of criteria air pollutants that may cause exceedances of the NAAQS or CAAQS, or cumulatively contribute to existing nonattainment of ambient air quality standards. Criteria air pollutants include O_3, nitrogen dioxide (NO_2), carbon monoxide (CO), sulfur dioxide, PM_{10} (course particulate matter), $PM_{2.5}$ (fine particulate matter), and lead. Pollutants that are evaluated herein include volatile organic compounds (VOCs) and oxides of nitrogen (NO_x), which are important because they are precursors to O_3, as well as CO, sulfur oxides (SO_x), PM_{10}, and $PM_{2.5}$.

Regarding NAAQS and CAAQS attainment status,[3] the SCAB is designated as a nonattainment area for federal and state O_3 and $PM_{2.5}$ standards (CARB 2018; EPA 2018). The SCAB is also designated as a nonattainment area for state PM_{10} standards; however, it is designated as an attainment area for federal PM_{10} standards. The SCAB is designated as an attainment area for federal and state CO and NO_2 standards, as well as for state sulfur dioxide standards. Although the SCAB has been designated as nonattainment for the federal rolling 3-month average lead standard, it is designated attainment for the state lead standard.[4]

Short-Term Construction Impacts

Construction of the project would result in the temporary addition of pollutants to the local airshed caused by on-site sources (e.g., off-road construction equipment, soil disturbance, VOC off-gassing from asphalt pavement application) and off-site sources (e.g., vendor trucks, haul trucks, and worker vehicle trips). Specifically, entrained dust results from the exposure of earth surfaces to wind from the direct disturbance and movement of soil, resulting in PM_{10} and $PM_{2.5}$ emissions. Internal combustion engines used by construction equipment, haul trucks, vendor trucks (i.e., delivery trucks), and worker vehicles would result in emissions of VOC, NO_x, CO, PM_{10}, and $PM_{2.5}$. Construction emissions can vary substantially from day to day depending on the level of activity; the specific type of operation; and, for dust, the prevailing weather conditions.

The project would be required to comply with SCAQMD Rule 403 (SCAQMD 2015) to control dust emissions generated during any dust-generating activities. Standard construction practices that would be employed to reduce fugitive dust emissions include watering of the active dust areas up to three times per day, depending on weather conditions.

For purposes of estimating project emissions, and based on information provided by the applicant, it is assumed that construction of the project would last approximately 12 months. Table 1 presents the estimated maximum daily construction emissions generated during construction of the project. The values shown are the maximum summer or winter daily emissions results from CalEEMod. Details of the emission calculations are provided in Appendix A.

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

[4] The phase-out of leaded gasoline started in 1976. Since gasoline no longer contains lead, the project is not anticipated to result in impacts related to lead; therefore, it is not discussed in this analysis.

Table 1. Estimated Maximum Daily Construction Criteria Air Pollutant Emissions

Year	VOC	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
	Pounds per Day					
2020	3.63	39.54	18.12	0.04	7.90	4.73
Maximum daily emissions	**3.63**	**39.54**	**18.12**	**0.04**	**7.90**	**4.73**
SCAQMD threshold	*75*	*100*	*550*	*150*	*150*	*55*
Threshold exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

Notes: VOC = volatile organic compound; NOx = oxides of nitrogen; CO = carbon monoxide; SOx = sulfur oxides; PM10 = coarse particulate matter; PM2.5 = fine particulate matter; SCAQMD = South Coast Air Quality Management District.
See Appendix A for complete results.
The values shown are the maximum summer or winter daily emissions results from CalEEMod for the three years of construction. These emissions reflect CalEEMod mitigated output, which accounts for compliance with SCAQMD Rule 1113 (Architectural Coatings) and implementation of the project's fugitive dust control strategies, including watering of the project site and unpaved roads three times per day, and restricting vehicle speed on unpaved roads to 15 mph.
In addition, in order to estimate fugitive dust from excavation and movement of the additional 10% soil excavation buffer (i.e., 11,927 cubic yards), fugitive dust (PM10 and PM2.5) was calculated using a spreadsheet model based on the CalEEMod equations for material handling. The potential 10% additional soil excavation would occur during the grading phase in year 1.

As provided in Table 1, daily construction emissions would not exceed the SCAQMD significance thresholds for VOC, NO_x, CO, SO_x, PM_{10}, or $PM_{2.5}$ during construction. Construction-generated emissions would be temporary and would not represent a long-term source of criteria air pollutant emissions. Therefore, short-term impacts associated with construction emissions would be less than significant.

Long-Term Operational Impacts

Operation of the project would generate VOC, NOx, CO, SOx, PM_{10}, and $PM_{2.5}$ emissions from mobile sources, including vehicle trips; area sources, including the use of consumer products, architectural coatings for repainting, and landscape maintenance equipment; and energy sources, including combustion of fuels used for space and water heating. Table 2 presents the maximum daily emissions associated with operation of the project in 2021 upon project buildout. The values shown are the maximum summer and winter daily emissions results from CalEEMod for area, energy, and off-road emissions sources plus the estimated mobile source emissions using a spreadsheet model and EMFAC emission factors. Complete details of the emissions calculations are provided in Appendix A.

Table 2. Estimated Maximum Daily Operational Criteria Air Pollutant Emissions

Emission Source	VOC	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
	pounds per day					
Area	1.27	0.00	0.01	0.00	0.00	0.00
Energy	0.01	0.05	0.04	0.00	0.00	0.00
Mobile	2.10	12.40	25.91	0.07	7.39	1.87
Total	**3.38**	**12.45**	**25.96**	**0.07**	**7.39**	**1.87**
SCAQMD Threshold	*55*	*55*	*550*	*150*	*150*	*55*
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

Notes: VOC = volatile organic compound; NO_x = oxides of nitrogen; CO = carbon monoxide; SO_x = sulfur oxides; PM_{10} = particulate matter with a diameter less than or equal to 10 microns (coarse particulate matter); $PM_{2.5}$ = particulate matter with a diameter less than or equal to 2.5 microns (fine particulate matter); SCAQMD = South Coast Air Quality Management District.
See Appendices A and B for complete results.
The values for area, energy, and off-road equipment shown are the maximum summer or winter daily emissions results from the CalEEMod output, assuming operational year 2021. The total values may not add up exactly due to rounding.

As shown in Table 2, maximum daily operational emissions of VOC, NO_x, CO, SO_x, PM_{10}, and $PM_{2.5}$ generated by the project would not exceed the SCAQMD's significance thresholds.

As previously discussed, the SCAB has been designated as a federal nonattainment area for O_3 and $PM_{2.5}$, and a state nonattainment area for O_3, PM_{10}, and $PM_{2.5}$. The nonattainment status is the result of cumulative emissions from various sources of air pollutants and their precursors within the SCAB, including motor vehicles, off-road equipment, and commercial and industrial facilities. Construction and operational activities of the project would generate VOC and NO_x emissions (precursors to O_3) and emissions of PM_{10} and $PM_{2.5}$. However, as indicated in Tables 1 and 2, project-generated emissions would not exceed the SCAQMD emission-based significance thresholds for VOCs, NO_x, PM_{10}, or $PM_{2.5}$.

Cumulative localized impacts would potentially occur if a project were to occur concurrently with another off-site project. Schedules for potential future projects near the project area are currently unknown; thus, potential impacts associated with two or more simultaneous projects would be considered speculative.[5] However, future projects would be subject to CEQA and would require air quality analysis and, where necessary, mitigation. Criteria air pollutant emissions associated with construction activity of future projects would be reduced through implementation of control measures required by the SCAQMD. Cumulative PM_{10} and $PM_{2.5}$ emissions would be reduced because all future projects would be subject to SCAQMD Rule 403 (Fugitive Dust), which sets forth general and specific requirements for all sites in the SCAQMD. In addition, cumulative VOC emissions would be subject to SCAQMD Rule 1113 (Architectural Coatings). Therefore, long-term impacts associated with operational emissions would be less than significant.

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

Less-Than-Significant Impact with Mitigation Incorporated. As further discussed below, with the incorporation of mitigation, the project would not expose sensitive receptors to substantial pollutant concentrations.

Localized Significance Threshold

A localized significance threshold (LST) analysis was performed to evaluate localized air quality impacts to sensitive receptors in the immediate vicinity of the project as a result of project activities. The impacts were analyzed using methods consistent with those in the SCAQMD's Final Localized Significance Threshold Methodology (SCAQMD 2008). The project is located within Source-Receptor Area 4 (Carson).

The greatest on-site daily emissions of NO_x, CO, PM_{10}, and $PM_{2.5}$ generated during construction would occur during the grading period of the project construction. It was assumed that two graders and two rubber-tired dozers would be used based on information provided by the applicant. CalEEMod default values assume that during an 8-hour day, graders and rubber tired dozers can each disturb a maximum of 0.5 acres. This results in 2 acres disturbed per day. The SCAQMD LST values for 2 acres within Source-Receptor Area 4 with a receptor distance of 40 meters (~131 feet), which are appropriate because the closest sensitive receptor is approximately 130 feet away, were compared to emissions from the project. LST vales are not provided for 40 meters; thus, SCAQMD LST values were interpolated from 25-meter and 50-meter data.

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

Project construction activities would result in temporary sources of on-site criteria air pollutant emissions associated with construction equipment exhaust and dust-generating activities. According to the Final Localized Significance Threshold Methodology, "off-site mobile emissions from the project should not be included in the emissions compared to the LSTs" (SCAQMD 2008). Trucks and worker trips associated with the project are not expected to cause substantial air quality impacts to sensitive receptors along off-site roadways since emissions would be relatively brief in nature and would cease once the vehicles pass through the main streets. Thus, off-site emissions from trucks and worker vehicle trips are not included in the LST analysis. The maximum daily on-site construction emissions generated during construction of the project are presented in Table 3 and compared to the SCAQMD localized significance criteria for Source-Receptor Area 4 to determine whether project-generated on-site construction emissions would result in potential impacts.

Table 3. Construction Localized Significance Thresholds Analysis

Year	NO_2	CO	PM_{10}	$PM_{2.5}$
	Pounds per Day (On Site)[a]			
2020	39.48	16.85	7.68	4.67
SCAQMD LST Criteria	*80.80*	*1,032*	*15.54*	*6.20*
Threshold Exceeded?	**No**	**No**	**No**	**No**

Source: SCAQMD2008.
Notes: NO_2 = nitrogen dioxide; CO = carbon monoxide; PM_{10} = particulate matter with a diameter less than or equal to 10 microns (coarse particulate matter); $PM_{2.5}$ = particulate matter with a diameter less than or equal to 2.5 microns (fine particulate matter); SCAQMD = South Coast Air Quality Management District; LST = localized significance threshold.
See Appendix A for detailed results.
[a] Localized significance thresholds are shown for a 2.0-acre disturbed area corresponding to a distance to a sensitive receptor of 40 meters in Source-Receptor Area 4 (Carson).

As shown in Table 3, proposed construction activities would not generate emissions in excess of site-specific LSTs. Therefore, impacts associated with localized LSTs impacts would be less than significant.

Health Impacts of Toxic Air Contaminants

Construction Health Risk Assessment

A construction health risk assessment (HRA) was performed to estimate the Maximum Individual Cancer Risk and the Chronic Hazard Index for residential receptors as a result of project construction. Results of the construction HRA are presented in Table 4.

Table 4. Construction Health Risk Assessment Results – Unmitigated

Impact Parameter	Units	Project Impact	CEQA Threshold	Level of Significance
Maximum Individual Cancer Risk – Residential	Per Million	78.23	10	Potentially Significant
Chronic Hazard Index – Residential	Index Value	0.088	1.0	Less than Significant

Source: SCAQMD 2019.
Note: CEQA = California Environmental Quality Act.
See Appendix A.

As shown in Table 4, project construction activities would result in a Residential Maximum Individual Cancer Risk of 78 in 1 million, which exceeds the significance threshold of 10 in 1 million. Project construction would result in a Residential Chronic Hazard Index of 0.088, which is below the 1.0 significance threshold. The project construction toxic air contaminant health risk impacts would be potentially significant, and thus, **Mitigation Measure (MM) AQ-1** is required.

MM-AQ-1: To reduce the potential for health risks as a result of construction of the project, the applicant shall:

A. Prior to the start of construction activities, the project applicant, or its designee, shall ensure that all 75 horsepower or greater diesel-powered equipment are powered with California Air Resources Board–certified Tier 4 Interim engines, except where the project applicant establishes to the satisfaction of the City of Carson that Tier 4 Interim equipment is not available.

B. All other diesel-powered construction equipment will be classified as Tier 3 or higher, at a minimum, except where the project applicant establishes to the satisfaction of the City of Carson that Tier 3 equipment is not available.

In the case where the applicant is unable to secure a piece of equipment that meets the Tier 4 Interim requirement, the applicant may upgrade another piece of equipment to compensate (from Tier 4 Interim to Tier 4 Final). Engine Tier requirements in accordance with this measure shall be incorporated on all construction plans.

Table 5 presents construction HRA results assuming implementation of **MM-AQ-1**, which requires Tier 4 Interim equipment.

Table 5. Construction Health Risk Assessment Results – Mitigated

Impact Parameter	Units	Project Impact	CEQA Threshold	Level of Significance
Maximum Individual Cancer Risk – Residential	Per Million	7.95	10	Less than Significant
Chronic Hazard Index – Residential	Index Value	0.009	1.0	Less than Significant

Source: SCAQMD 2019.
Note: CEQA = California Environmental Quality Act.
See Appendix A.

As shown in Table 5, with the implementation of **MM-AQ-1** requiring Tier 4 Interim equipment, the estimated cancer risk during project construction would be reduced below the SCAQMD threshold of 10 in 1 million. Therefore, with the incorporation of mitigation, short-term construction impacts associated with cancer burden and chronic health risks would be less than significant.

Operation Health Risk Assessment

An operational HRA was performed to estimate the Maximum Individual Cancer Risk and the Chronic Hazard Index for residential receptors as a result of project operation including truck trips and truck idling. Results of the operational HRA are presented in Table 6.

Table 6. Operational Health Risk Assessment Results - Unmitigated

Impact Parameter	Units	Project Impact	CEQA Threshold	Level of Significance
Maximum Individual Cancer Risk – Residential	Per Million	4.29	10	Less than Significant
Chronic Hazard Index – Residential	Index Value	0.001	1.0	Less than Significant

Source: SCAQMD 2019.
Notes: CEQA = California Environmental Quality Act.
See Appendix A.

As shown in Table 6, project operational activities would result in a Residential Maximum Individual Cancer Risk of 4.29 in 1 million, which would be less than the significance threshold of 10 in 1 million. Project operation would also result in a Residential Chronic Hazard Index of 0.001, which is below the 1.0 significance threshold.

Since the cancer risk from project operation at the maximally exposed individual resident exceeds 1 in a million, cancer burden, for which the SCAQMD significance threshold is 0.5, is evaluated. The maximum estimated 70-year cancer risk for project operation was estimated at 5.2 in a million with HARP2 using the Population-Wide option in the model, which is specified for use in cancer burden estimates. The total population in the zone of impact area was estimated to be approximately 10,995 persons, based on the average densities of the census tracts that would be within the zone of impact (census tracts 5435.03 and 5438.01) (U.S. Census Bureau 2019). Multiplying the maximum estimated 70-year cancer risk by the project population gives a cancer burden of 0.057. Accordingly, this would be less than the SCAQMD cancer burden threshold of 0.5. Therefore, long-term operational impacts associated with cancer burden and chronic health risks would be less than significant.

Local Carbon Monoxide Concentrations

At the time that the SCAQMD 1993 Handbook was published, the SCAB was designated nonattainment under the CAAQS and NAAQS for CO. In 2007, the SCAQMD was designated in attainment for CO under both the CAAQS and NAAQS as a result of the steady decline in CO concentrations in the SCAB due to turnover of older vehicles, introduction of cleaner fuels, and implementation of control technology on industrial facilities. The SCAQMD conducted CO modeling for the 2003 AQMP (Appendix V: Modeling and Attainment Demonstrations, SCAQMD 2003) for the four worst-case intersections in the SCAB: (1) Wilshire Boulevard and Veteran Avenue, (2) Sunset Boulevard and Highland Avenue, (3) La Cienega Boulevard and Century Boulevard, and (4) Long Beach Boulevard and Imperial Highway. At the time the 2003 AQMP was prepared, the intersection of Wilshire Boulevard and Veteran Avenue was the most congested intersection in Los Angeles County, with an average daily traffic volume of about 100,000 vehicles per day. Using CO emission factors for 2002, the peak modeled CO 1-hour concentration was estimated to be 4.6 ppm at the intersection of Wilshire Boulevard and Veteran Avenue. When added to the maximum 1-hour CO concentration from 2016 through 2018 at the Webster monitoring station, which was 5 ppm in 2018, the 1-hour CO would be 9.6 ppm, while the CAAQS is 20 ppm.

The 2003 AQMP also projected 8-hour CO concentrations at these four intersections for 1997 and from 2002 through 2005. From years 2002 through 2005, the maximum 8-hour CO concentration was 3.8 ppm at the Sunset Boulevard and Highland Avenue intersection in 2002; the maximum 8-hour CO concentration was 3.4 ppm at the Wilshire Boulevard and Veteran Avenue in 2002. Adding the 3.8 ppm to the maximum

8-hour CO concentration from 2016 through 2018 at the Webster monitoring station, which was 2.6 ppm in 2017, the 8-hour CO would be 6.4 ppm, while the CAAQS is 9.0 ppm.

Accordingly, CO concentrations at congested intersections would not exceed the 1-hour or 8-hour CO CAAQS unless projected daily traffic would be at least over 100,000 vehicles per day (refer to Section 3.17, Transportation). Because the project would not increase daily traffic volumes at any study intersection to more than 100,000 vehicles per day, a CO hotspot is not anticipated to occur. Therefore, impacts associated with CO hotspots would be less than significant.

Health Effects of Criteria Air Pollutants

Health effects associated with O_3 include respiratory symptoms, worsening of lung disease leading to premature death, and damage to lung tissue (CARB 2019). VOCs and NO_x are precursors to O_3, for which the SCAB is designated as nonattainment with respect to the NAAQS and CAAQS. Thus, existing O_3 levels in the SCAB are at unhealthy levels during certain periods. The contribution of VOCs and NO_x to regional ambient O_3 concentrations is the result of complex photochemistry. The increases in O_3 concentrations in the SCAB due to O_3 precursor emissions tend to be found downwind from the source location to allow time for the photochemical reactions to occur. However, the potential for exacerbating excessive O_3 concentrations would also depend on the time of year that the VOC emissions would occur because exceedances of the O_3 NAAQS and CAAQS tend to occur between May and October when solar radiation is highest. The holistic effect of a single project's emissions of O_3 precursors is speculative due to the lack of quantitative methods to assess this impact. Nonetheless, because the project would not involve construction or operational activities that would result in O_3 precursor emissions (VOC or NO_x) in excess of the SCAQMD thresholds, the project is not anticipated to substantially contribute to regional O_3 concentrations and the associated health impacts.

Exposure to NO_2 and NO_x can irritate the lungs, cause bronchitis and pneumonia, lower resistance to respiratory infections, and enhance allergic responses (CARB 2019). Project construction and operation would not exceed the SCAQMD NO_x threshold, and existing ambient NO_2 concentrations are below the NAAQS and CAAQS. Thus, implementation of the project is not expected to exceed the NO_2 standards or contribute to associated health effects.

Health effects associated with CO include chest pain in patients with heart disease, headache, light-headedness, and reduced mental alertness (CARB 2019). CO tends to be a localized impact associated with congested intersections. CO hotspots were discussed previously as a less-than-significant impact. Thus, the project's CO emissions would not contribute to the health effects associated with this pollutant.

Health effects associated with PM_{10} include premature death and hospitalization, primarily for worsening of respiratory disease (CARB 2019). The SCAB is designated as nonattainment for PM_{10} under the CAAQS and nonattainment for $PM_{2.5}$ under the NAAQS and CAAQS. Implementation of the project would not generate emissions of PM_{10} or $PM_{2.5}$ that would exceed the SCAQMD's thresholds. Accordingly, the project's PM_{10} and $PM_{2.5}$ emissions are not expected to cause an increase in related regional health effects for these pollutants.

In summary, the project would not result in a potentially significant contribution to regional concentrations of nonattainment pollutants, and would not result in a significant contribution to the adverse health impacts associated with those pollutants. Therefore, impacts would be less than significant.

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

Less-Than-Significant Impact. The occurrence and severity of potential odor impacts depends on numerous factors. The nature, frequency, and intensity of the source; the wind speeds and direction; and the sensitivity of the receiving location each contribute to the intensity of the impact. Although offensive odors seldom cause physical harm, they can be annoying and cause distress among the public and generate citizen complaints.

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

Land uses and industrial operations associated with odor complaints include agricultural uses, wastewater treatment plants, food-processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding (SCAQMD 1993). The project entails operation of a cargo container parking facility, which has not been identified by SCAQMD as a land use typically associated with odor complaints. Therefore, impacts associated with odors and other emissions would be less than significant.

3.4 Biological Resources

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
IV. BIOLOGICAL RESOURCES – Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☐	☐	☒

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☐	☒
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☐	☒
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒

a) 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 Game or U.S. Fish and Wildlife Service?

No Impact. The project site is located in a highly developed part of the City and is surrounded by an urbanized mix of land uses. The nearest open space area as identified by the City's General Plan is Carson Park, which is located approximately 0.6 miles to the southeast of the project site. Due to the intervening development between the project site and this open space area, there is no direct connection between the project site and this parkland area.

No native habitat is located on the project site or in the immediately surrounding area. The project site consists of a flat, vacant lot covered with disturbed soils and dry grasses. Plant species surrounding the project site are limited to non-native, ornamental species located within the public right-of-way, including turf grass and palm species. These non-native, ornamental plant species form a non-cohesive plant community that is not known to support any candidate, sensitive, or special-status plant species. Based on the developed nature of the project site and surrounding area, wildlife species that could occur on site include common species typically found in urbanized settings, such as house sparrow (*Passer domesticus*), mourning dove (*Zenaida macroura*), and western fence lizard (*Sceloporus occidentalis*). As such, wildlife species that can reasonably be expected to occur on the project site would not be considered candidate, sensitive, or special-status wildlife species.

Ornamental landscape trees that are currently located on the project site may require removal prior to construction of the project. Because of the highly disturbed nature of the project site and the existing development around the site, it is unlikely that the existing trees would provide desirable nesting

opportunities for bird/raptor species, especially considering that more suitable nesting options likely occur within the broader project area. Therefore, no impacts associated with candidate, sensitive, or special-status species would occur.

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 Game or U.S. Fish and Wildlife Service?

No Impact. No native habitat is located on the project site or in the immediately surrounding area. The project site consists of a flat, vacant lot covered with disturbed soils and dry grasses. Plant species surrounding the project site are limited to non-native, ornamental species located within the public right-of-way, including turf grass and palm species. These non-native, ornamental plant species form a non-cohesive plant community. Therefore, no impacts to riparian or sensitive vegetation communities would occur as result of the project.

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

No Impact. No federally defined waters of the United States or state occur within the project site. This includes the absence of federally defined wetlands and other waters (e.g., drainages) and state-defined waters (e.g., streams and riparian extent). A concrete-lined, engineered stormwater culvert that eventually outlets to the Dominguez Channel is located immediately north of the project site; however, the channel does not intersect the project site and the project would not connect or alter this culvert. In addition, the project would be subject to typical restrictions and requirements that address erosion and runoff (e.g., best management practices [BMPs]), including those of the Clean Water Act and National Pollutant Discharge Elimination System (NPDES) permit. Therefore, no impacts to jurisdictional waters or wetlands would occur.

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

No Impact. Although some local movement of wildlife is expected to occur within the broader City, the City is not recognized as an existing or proposed Significant Ecological Area that links migratory populations, as designated by the County (County of Los Angeles 2020a). The project site is located within a highly urbanized area and the site is currently fenced in all directions, which would greatly prohibit any incidental wildlife movement, in the unlikely scenario that any movement occurs in the project area. Construction of the project would not interfere with the movement of any native residents, migratory fish, or wildlife species. Therefore, no impacts associated with wildlife movement or wildlife corridors would occur.

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

No Impact. Ornamental landscape trees that are currently located on the project site may require removal prior to construction of the project. However, the City does not have any local policies or ordinances protecting trees located on private property. As such, implementation of the project would not

conflict with local policies. Therefore, no impacts associated with local policies or ordinances protecting biological resources would occur.

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

No Impact. The project site is not located within any habitat conservation plan; natural community conservation plan; or other approved local, regional, or state habitat conservations plan area. Therefore, no impacts associated with an adopted conservation plan would occur.

3.5 Cultural Resources

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

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

No Impact. A historical resource is defined by PRC Section 21084.1 and CEQA Guidelines Section 15064.5 as any resource listed or determined to be eligible for listing in the National Register of Historic Places (NRHP) as well as some California State Landmarks and Points of Historical Interest. In addition, historical resources are evaluated against the California Register of Historical Resources (CRHR) criteria prior to making a finding as to the project's impacts on historical resources. Generally, resources must be at least 50 years old to be considered for listing in the CRHR as a historical resource. A significant adverse effect would occur if a project were to adversely affect a historical resource as defined by PRC Section 21084.1 and Section 15064.5 of the CEQA Guidelines.

The project site is currently a vacant parcel with no existing structures on site. As such, the project site does not contain any built-environment resources that could be eligible for listing in the NRHP or CRHR, and thus, would not be considered a historical resource as defined by CEQA. Therefore, no impacts associated with historical resources would occur.

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

Less-Than-Significant Impact with Mitigation Incorporated. On January 22, 2020, a records search was conducted of the California Historical Resources Information System at the South Central Coastal Information Center (SCCIC), located on the campus of California State University, Fullerton, of the project site and a 0.5-mile (804 feet) record search area. This search included their collections of mapped prehistoric, historic, and built environment resources; Department of Parks and Recreation Site Records; technical reports; and ethnographic references. Additional consulted sources included historical maps of the study area, the NRHP, the CRHR, the California Historic Property Data File, the lists of California State Historical Landmarks, California Points of Historical Interest, and the Archaeological Determinations of Eligibility.

The SCCIC records indicate that 15 cultural resources investigations have been conducted within 0.5 miles of the project site. Of these 15 studies, 2 overlap the project site (LA-03583 and LA-6194) and 1 (LA-00229) is adjacent to the project site. These reports discussed historical and prehistoric resources located within the broader project area and the City. However, no resources were identified in these previous studies either within or near the project site. While two previously recorded cultural resources fall within a 0.5-mile radius of the project site, both of these resources are identified as prehistoric habitation debris located outside of the project site.

Previous on-site development activities associated with the former landfill use affected the entirety of the project site, and as such, it follows that any resources that may have once been located on the project site would have been significantly disturbed. In addition, grading, excavation, and other earthmoving construction activities would be greatly limited due to the presence of subsurface contamination. Nonetheless, it is always possible that intact archaeological deposits are present at subsurface depths that were not earlier impacted by the current on-site development. For this reason, the project site should be treated as potentially sensitive for archaeological resources. Mitigation measure **MM-CUL-1** shall be implemented to reduce potential impacts to unanticipated archaeological resources to less than significant.

MM-CUL-1 If archaeological resources (sites, features, or artifacts) are exposed during construction activities for the project, all construction work occurring within 100 feet of the find shall immediately stop until a qualified archaeologist, meeting the Secretary of the Interior's Professional Qualification Standards, can evaluate the significance of the find and determine whether or not additional study is warranted. Depending on the significance of the find under the California Environmental Quality Act (CEQA) (14 CCR 15064.5[f]; California Public Resources Code, Section 21082), the archaeologist may simply record the find and allow work to continue. If the discovery proves significant under CEQA, additional work, such as preparation of an archaeological treatment plan and data recovery, may be warranted.

With incorporation of mitigation, impacts associated with archaeological resources would be less than significant.

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

Less-Than-Significant Impact. In the highly unlikely event that human remains are uncovered during ground-disturbing activities, there are regulatory provisions to address the handling of human remains in California Health and Safety Code Section 7050.5, PRC Section 5097.98, and CEQA Guidelines Section 15064.5(e). Pursuant to these codes, in the event that human remains are discovered, disturbance of the site shall remain halted until the County coroner has conducted an investigation into the circumstances, manner, and cause of any death, and the recommendations concerning the treatment and disposition of the human remains have been made to the person responsible for the excavation or to his or her authorized representative, in the manner provided in Section 5097.98 of the PRC. The County coroner is required to make a determination within 2 working days of notification of the discovery of the human remains. If the County coroner determines that the remains are not subject to his or her authority, and if he or she recognizes or has reason to believe the human remains to be those of a Native American, he or she shall consult with the Native American Heritage Commission by telephone within 24 hours, to designate a Most Likely Descendant who shall recommend appropriate measures to the landowner regarding the treatment of the remains. If the owner does not accept the Most Likely Descendant's recommendations, the owner or the Most Likely Descendant may request mediation by the Native American Heritage Commission. Therefore, with compliance with this existing state law, impacts associated with human remains would be less than significant.

3.6 Energy

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

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?

Short-Term Construction Impacts

Less-Than-Significant Impact. Construction of the project would require the use of electric power for as-necessary lighting and electronic equipment. The amount of electricity used during construction would be limited to energy demand that typically stems from the use of electrically powered construction equipment. This electricity demand would be temporary and would cease upon completion of construction; thus, the project would not adversely impact the available electricity supply. During construction, natural gas would typically not be consumed on the project site.

Petroleum would be consumed throughout construction of the project. Fuel consumed by construction equipment would be the primary energy resource expended over the course of construction. VMT associated with the transportation of construction materials and construction worker commutes also would result in petroleum consumption. However, the project would be required to comply with CARB's Airborne Toxics Control Measure, which restricts heavy-duty diesel vehicle idling time to 5 minutes. In addition, the construction of the project would be a temporary, short-term activity, and any petroleum used during the construction phase would be used towards the development of the project; as such, petroleum use for construction would be relatively nominal and would not be wasteful or inefficient use of resources. Therefore, short-term construction impacts associated with energy consumption would be less than significant.

Long-Term Operational Impacts

Less-Than-Significant Impact. The project proposes a cargo container parking facility and ancillary on-site use. Given that the project consists of adding structures, intensification of operations that occur on the project site would increase. Thus, the project is expected to increase the on-site use of electricity and natural gas compared with the existing conditions.

The operational phase would require electricity for multiple purposes including, but not limited to, building heating and cooling, lighting, and electronics. In addition, the supply, conveyance, treatment, and distribution of water and wastewater would indirectly result in electricity usage. Electricity consumption associated with project operation is based on the CalEEMod outputs presented in Appendix A.

Per the 2016 California Green Building Standards (CALGreen) Tier 1 standards (24 CCR Part 11), which would be required by the City, the project would be required to demonstrate that buildings exceed Title 24, Part 6, of the California Code of Regulations energy efficiency standards by 15%. The project would be subject to statewide mandatory energy requirements as outlined in Title 24, Part 6, of the California Code of Regulations. Title 24, Part 11, of the California Code of Regulations contains additional energy measures that are applicable to the project under CALGreen. Therefore, long-term construction impacts associated with energy consumption would be less than significant.

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

Less-Than-Significant Impact. As discussed in Impact 3.6(a), the project would not result in wasteful, inefficient, and unnecessary consumption of energy during construction or operation. Therefore, impacts associated with the potential of the project to conflict with a state or local renewable energy or energy efficiency plan would be less than significant.

3.7 Geology and Soils

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
VII. GEOLOGY AND SOILS – Would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☐	☒
ii) Strong seismic ground shaking?	☐	☐	☒	☐
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
iv) Landslides?	☐	☐	☐	☒
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☒	☐
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☒	☐
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☐	☒
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐

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

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

No Impact. According to the City's General Plan Safety Element (City of Carson 2004), there are no faults underlying the City or any Alquist-Priolo Earthquake Fault Zones within the City. Because the project site is not located within an active fault zone, the likelihood of fault rupture occurring within the project site is low. In addition, the project would not exacerbate the potential for fault rupture to occur, and thus, would not directly or indirectly cause substantial adverse effects due to fault rupture. Therefore, no impacts associated with fault rupture would occur.

ii) Strong seismic ground shaking?

Less-Than-Significant Impact. Like most of the Southern California region, the project site is located within a seismically active area. Numerous faults considered active or potentially active have been mapped in Southern California, including in the vicinity of the City. Thus, the project site could be exposed to strong seismic ground shaking in the event of an earthquake.

According to the City's General Plan Safety Element (City of Carson 2004), the Newport-Inglewood, Whittier, Santa Monica, and Palos Verdes faults are active faults most likely to cause high ground accelerations in the City. However, with adherence to the incumbent version of the state and local building codes and construction practices, damage to the proposed structures and loss of life as a result of a moderate or major earthquake would be minimized. As such, the project would not exacerbate the potential for seismic shaking to occur, and thus, would not directly or indirectly cause substantial adverse effects due to strong seismic ground shaking. Therefore, impacts associated with strong seismic ground shaking due to faulting would be less than significant.

iii) Seismic-related ground failure, including liquefaction?

Less-Than-Significant Impact. Exhibit SAF-4 in the City's General Plan Safety Element shows the project site being underlain by soils susceptible to liquefaction. This finding is supported by the Preliminary Soils Engineering Investigation (Appendix C), which determined that liquefaction is likely to occur on the project site during a major earthquake event. However, with adherence to the incumbent version of the state and local building codes and construction practices, damage to the proposed structures and loss of life as a result of seismically induced liquefaction would be minimized. Therefore, impacts associated with seismic-related ground failure such as liquefaction would be less than significant.

iv) Landslides?

No Impact. The project site and surrounding area are relatively flat and lack any hillsides or topographic features typically susceptible to landslides. As such, the project would not expose people or structures to risk of landslides. Therefore, no impacts associated with landslides would occur.

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

Less-Than-Significant Impact. Construction activities would disturb surface soils and temporarily leave exposed soil on the ground surface. Common causes of soil erosion from construction sites include stormwater, wind, and soil being tracked off site by vehicles. To help curb erosion, project construction activities must comply with all applicable federal, state, and local regulations for erosion control. Because the project would disturb 1 or more acres of soil, the project is subject to the California State Water Resources Control Board NPDES Construction General Permit (General Construction Permit). Construction activities would be required to incorporate various temporary BMPs designed to prevent erosion and siltation.

In addition, upon completion of construction, all exposed areas would be paved with new asphalt and structures. Overall, once operational, the project would have decreased the amount of exposed soils on the project site, which would correspond with a reduction in the potential for erosion. Therefore, impacts associated with soil erosion would be less than significant.

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

Less-Than-Significant Impact. The project site is composed of 40% urban land-Biscailuz-Hueneme, drained complex, and 60% urban land-Centinela-Typic Xerorthents, fine substratum complex. Both complexes have a parent material of discontinued human-transported material over mixed alluvium (USDA 2020). According to the Preliminary Soils Engineering Investigation (Appendix C), the potential for hazards due to collapsible soil in the area of the project is considerably low, and the project would not be significantly impacted by hazards from landslide, settlement, or slippage.

The project site is underlain by soils susceptible to liquefaction, and the Preliminary Soils Engineering Investigation found that liquefaction is likely to occur on the project site occur during a major earthquake event. However, with adherence to the incumbent version of the state and local building codes and construction practices, damage to the proposed structures and loss of life as a result of seismically induced liquefaction would be minimized. Therefore, impacts associated with unstable geologic units or soils 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?

Less-Than-Significant Impact. The project site is composed of 40% urban land-Biscailuz-Hueneme, drained complex, and 60% urban land-Centinela-Typic Xerorthents, fine substratum complex. Both complexes have a parent material of discontinued human-transported material over mixed alluvium and are associated with a clay loam profile (USDA 2020). The Preliminary Soils Engineering Investigation (Appendix C) found that based on the on-site soil classification and laboratory testing results, the silty-clayey sand located in the upper area of the project site are considered low in expansion potential. Therefore, impacts 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 waste water disposal systems where sewers are not available for the disposal of waste water?

No Impact. The project would connect to the existing municipal sewer system and would not require a septic or alternative wastewater disposal system. Therefore, no impacts associated with the ability of soils to support septic tanks would occur.

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

Less-Than-Significant Impact with Mitigation Incorporated. According to the City's General Plan EIR, there are no paleontological resources within the City. The City has undergone significant transition and development, and much of the area was previously used for cattle ranching (City of Carson 2002). In terms of the project site, previous on-site development activities associated with the former landfill use affected the entirety of the project site. As such, it follows that any resources that may have once been located on the project site would have been significantly disturbed. In addition, grading, excavation, and other earthmoving construction activities would be greatly limited due to the presence of subsurface contamination.

Nonetheless, it is always possible that intact paleontological resources are present at subsurface depths that were not impacted by previous grading activities. For instance, at depths below human-transported fill materials, there is a greater likelihood of encountering sediments that are old enough to contain significant paleontological resources. Given these factors, the likelihood of impacting paleontological resources within the project site is considered low above the original ground surface, increasing with depth. Therefore, if excavations are anticipated to occur at depths below the original surface, mitigation is required. **MM-GEO-1** is recommended to reduce potential impacts to unanticipated paleontological resources.

MM-GEO-1 If excavations reach depths below human-transported fill materials, a qualified paleontologist meeting the 2010 Society of Vertebrate Paleontologists (SVP) standards should be retained to determine when and where paleontological monitoring is warranted. The qualified paleontologist or a qualified paleontological monitor meeting the 2010 SVP standards under the direction of the qualified paleontologist shall conduct the paleontological monitoring. If the sediments are determined by the qualified paleontologist to be too young or too coarse-grained to likely preserve paleontological resources, the qualified paleontologist can reduce or terminate monitoring per the 2010 SVP guidelines and based on the excavations remaining for the project.

With incorporation of **MM-GEO-1**, impacts associated with paleontological resources would be less than significant.

3.8 Greenhouse Gas Emissions

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
VIII. GREENHOUSE GAS EMISSIONS – Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

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

Construction Emissions

Less-Than-Significant Impact. Construction of the project would result in greenhouse gas (GHG) emissions, which are primarily associated with use of off-road construction equipment, on-road vendor trucks, and worker vehicles. The SCAQMD Draft Guidance Document – Interim CEQA Greenhouse Gas (GHG) Significance Threshold (2008) recommends that "construction emissions be amortized over a 30-year project lifetime, so that GHG reduction measures will address construction GHG emissions as part of the operational GHG reduction strategies." As such, the total construction GHG emissions were calculated, amortized over 30 years, and added to the total operational emissions for comparison with the GHG significance threshold of 3,000 metric tons (MT) of carbon dioxide equivalent (CO_2e) per year. Thus, the determination of significance is addressed in the operational emissions discussion following the estimated construction emissions.

CalEEMod was used to calculate the annual GHG emissions based on the construction scenario (see Appendix A). Construction of the project is anticipated last a total of approximately 12 months. On-site sources of GHG emissions include off-road equipment and off-site sources include vendor trucks and worker vehicles. Table 7 presents construction emissions for the project from on-site and off-site emission sources.

Table 7. Estimated Annual Construction Greenhouse Gas Emissions

Construction Year	CO_2	CH_4	N_2O	CO_2e
	Metric Tons per Year			
2020	307.38	0.07	0.00	309.21
Total	**307.38**	**0.07**	**0.00**	**309.21**
			Amortized construction emissions	***10.31***

Source: Appendix A.
Notes: CO_2 = carbon dioxide; CH_4 = methane; N_2O = nitrous oxide; CO_2e = carbon dioxide equivalent.
Total emissions may not sum due to rounding.

As provided in Table 7, the estimated total GHG emissions during construction of would be approximately 309 MT CO_2e over the construction period. Estimated project-generated construction emissions amortized over 30 years would be approximately 10.31 MT CO_2e per year. As with project-generated construction criteria air pollutant emissions, GHG emissions generated during construction of the project would be short-term in nature, lasting only for the duration of the construction period, and would not represent a long-term source of GHG emissions. Therefore, short-term construction impacts associated with GHG emissions would be less than significant.

Operational Emissions

Less-Than-Significant Impact. Operation of the project would generate GHG emissions through motor vehicle trips to and from the project site; landscape maintenance equipment operation; energy use (natural gas and generation of electricity consumed by the project); natural gas-fueled emergency generator maintenance and testing; solid waste disposal; and generation of electricity associated with water supply, treatment, and distribution and wastewater treatment. CalEEMod was used to calculate the annual GHG emissions based on the operational assumptions (see Appendix A).

The estimated operational project-generated GHG emissions from area sources, energy usage, motor vehicles, natural gas emergency generator stationary sources, solid waste generation, and water usage and wastewater generation are shown in Table 8.

Table 8. Estimated Annual Operational Greenhouse Gas Emissions

Emission Source	CO_2	CH_4	N_2O	CO_2e
	Metric Tons per Year			
Area	<0.01	0.00	0.00	<0.01
Energy	161.52	0.01	<0.01	162.19
Mobile	1,134.64	0.05	0.09	1,162.43
Solid waste	10.08	0.60	0.00	24.98
Water supply and wastewater	41.9	0.3	0.01	51.67
Total	**1,348.14**	**0.096**	**0.10**	**1,401.27**
			Amortized construction emissions	*10.31*
			Total operational + amortized construction GHGs	**1,411.58**

Source: Appendix A.
Notes: CO_2 = carbon dioxide; CH_4 = methane; N_2O = nitrous oxide; CO_2e = carbon dioxide equivalent; GHG = greenhouse gas.
These emissions reflect operational year 2021.

As shown in Table 8, estimated annual project-generated GHG emissions would be approximately 1,401 MT CO_2e per year as a result of project operations only. After summing the amortized project construction emissions, total GHGs generated by the project would be approximately 1,412 MT CO_2e per year. As such, annual operational GHG emissions with amortized construction emissions would not exceed the SCAQMD threshold of 3,000 MT CO_2e per year. Therefore, long-term operational impacts associated with GHG emissions would be less than significant.

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

Less-Than-Significant Impact. In 2017, the City, in cooperation with the South Bay Cities Council of Governments, developed an unqualified Climate Action Plan (CAP). The CAP serves as a guide for action by setting GHG emission reductions goals and establishes strategies and policy to achieve outcomes over the preceding 20 years. The CAP identifies strategies in the following select areas.

- Land Use and Transportation—Facilitate pedestrian and neighborhood development and identify ways to reduce automobile emissions including supporting zero emission vehicle infrastructure, improving pedestrian and bicycle infrastructure, enhancing public transit service, and supporting reductions in single-occupancy vehicle use.
- Energy Efficiency—Emphasize energy efficiency retrofits for existing buildings, energy performance requirements for new construction, water efficient landscaping, and financing programs that will allow home and business owners to obtain low-interest loans for implementing energy efficiency in their buildings.
- Solid Waste—Focus on increasing waste diversion and encouraging participation in recycling and composting throughout the community.
- Urban Greening—Contain measures that create "carbon sinks" as they store GHG emissions that are otherwise emitted into the atmosphere as well as support health of the community.
- Energy Generation and Storage—Demonstrate the City's commitment to support the implementation of clean, renewable energy while decreasing dependence on traditional, GHG emitting power sources.

As described in the CAP, the five categories identified above have the potential to reduce approximately 256,741 MT CO_2e emissions per year and accomplish the City's reduction targets of 15% below 2005 by 2020 and 49% below 2005 by 2035. Of the five CAP categories, Land Use and Transportation, Energy Efficiency, and Solid Waste are relevant to the project. The project will include water-efficient landscaping, and waste associated with the project will be disposed of per state requirements for landfills, material recovery facilities, and transfer stations. Furthermore, the project will also be subject to local commercial solid waste recycling programs required to be implemented by each jurisdiction under Assembly Bill (AB) 341. As such, the construction and operation of the project would not interfere with the City's CAP strategies for Urban Greening or Energy Generation and Storage. Therefore, the project would not conflict with the City's implementation of the CAP.

Scoping Plan

The *Climate Change Scoping Plan: A Framework for Change* (Scoping Plan) (approved by CARB in 2008 and updated in 2014 and 2017) provides a framework for actions to reduce California's GHG emissions and requires CARB and other state agencies to adopt regulations and other initiatives to reduce GHGs. The Scoping Plan is not directly applicable to specific projects, nor is it intended to be used for project-level evaluations.[6] Under the Scoping Plan, however, there are several state regulatory measures aimed at the identification and reduction of GHG emissions. CARB and other state agencies have adopted many of the

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

measures identified in the Scoping Plan. Most of these measures focus on area source emissions (e.g., energy usage, high–global warming potential GHGs in consumer products) and changes to the vehicle fleet (i.e., hybrid, electric, and more fuel-efficient vehicles) and associated fuels (e.g., Low Carbon Fuel Standard), among others.

The Scoping Plan recommends strategies for implementation at the statewide level to meet the goals of AB 32 and establishes an overall framework for the measures that will be adopted to reduce California's GHG emissions. To the extent that these regulations are applicable to the project, its inhabitants, or uses, the project would comply with all regulations adopted in furtherance of the Scoping Plan to the extent required by law.

Southern California Association of Governments 2016 RTP/SCS

The SCAG 2016 RTP/SCS is a regional growth-management strategy that targets per capita GHG reduction from passenger vehicles and light-duty trucks in the Southern California region pursuant to Senate Bill (SB) 375. In addition to demonstrating the region's ability to attain and exceed the GHG emission-reduction targets set forth by CARB, the 2016 RTP/SCS outlines a series of actions and strategies for integrating the transportation network with an overall land use pattern that responds to projected growth, housing needs, changing demographics, and transportation demands. Thus, successful implementation of the 2016 RTP/SCS would result in more complete communities with a variety of transportation and housing choices, while reducing automobile use. With regard to individual developments, such as the project, the strategies and policies set forth in the 2016 RTP/SCS can be grouped into the following three categories: (1) reduction of vehicle trips and VMT; (2) increased use of alternative fuel vehicles; and (3) improved energy efficiency. The project's consistency with these three strategy categories is presented below.

1. Consistency with VMT Reduction Strategies and Policies

The project's consistency with this aspect of the 2016 RTP/SCS is demonstrated via the project's land use characteristics and consistency with the regional growth forecast assumed in the 2016 RTP/SCS for the City.

As further discussed in Section 3.14, the project would not stimulate population growth or population concentration above what is assumed in local and regional land use plans, and does not include either residential uses or the extension of roads or other infrastructure. As such, the project would not either directly or indirectly induce growth in the project region. In addition, the project would not conflict with an applicable land use plan, policy, or regulation of an agency with jurisdiction over the project, as further described in Section 3.11. Vehicle trip generation as a result of the project is concluded to have been anticipated in the SCAG 2016 RTP/SCS growth projections because the project site would be accommodated by the City's predicted projections.

2. Increased Use of Alternative Fueled Vehicles Policy Initiative

The second goal of the 2016 RTP/SCS, with regard to individual development projects such as the project, is to increase alternative-fueled vehicles to reduce per capita GHG emissions. This 2016 RTP/SCS policy initiative focuses on accelerating fleet conversion to electric or other near zero-emission technologies. The project would comply with the applicable 2016 CALGreen standards. In addition, the project would require the following:

- Preparation and implementation of a Transportation Demand Management Plan that shall promote the use of alternative transportation, such as mass transit, ride sharing, bicycling, and walking to reduce project trips and/or VMT.
- Provision of on-site bicycle storage for visitors and employees.
- Accessibility to multiple public transportation lines adjacent to the project site.
- Allocation of preferred parking for alternative-fuel vehicles and low-emitting, fuel-efficient, and ride-sharing vehicles.
- As required, provision of electric vehicle charging stations (i.e., provide electric vehicle supply wiring equal to 5% of the total number of parking spaces).

3. Energy Efficiency Strategies and Policies

The third important focus within the 2016 RTP/SCS for individual developments such as the project involves improving energy efficiency (e.g., reducing energy consumption) to reduce GHG emissions. The 2016 RTP/SCS goal is to actively encourage and create incentives for energy efficiency, where possible. The project would comply with the applicable 2016 CALGreen standards. In addition, the project would require the following:

- Energy Star–labeled products and appliances shall be installed where appropriate.
- Meeting of Title 24, Part 6, California Energy Code baseline standard requirements for energy efficiency, based on the 2013 Energy Efficiency Standards requirements. Examples of design methods and technologies that shall be implemented may include, but not be limited to, high-performance glazing on windows, appropriately oriented shading devices, high-efficiency boilers (if single metered), instantaneous water heaters (if individual meters), and enhanced insulation to minimize solar and thermal gain.
- Application of energy-saving technologies and components to reduce the project's electrical usage-profile.
- Incorporation of passive energy efficiency strategies, such as roof overhangs, porches, and inner courtyards.
- During operations, in order to achieve maximum efficiency while maintaining safety for residents and visitors, exterior lighting elements will be controlled by light sensors and/or timeclocks to avoid over lighting as appropriate.
- Commissioning of building energy systems to verify that the project's building energy systems are installed, calibrated, and performing to the Owner's project requirements.

Based on the analysis above, the project would be consistent with the SCAG 2016 RTP/SCS.

Executive Order S-3-05 and Senate Bill 32

- **Executive Order (EO) S-3-05.** This EO establishes the following goals: GHG emissions should be reduced to 2000 levels by 2010, to 1990 levels by 2020, and to 80% below 1990 levels by 2050.
- **SB 32.** This bill establishes for a statewide GHG emissions reduction target whereby CARB, in adopting rules and regulations to achieve the maximum technologically feasible and cost-effective GHG emissions reductions, shall ensure that statewide GHG emissions are reduced to at least 40% below 1990 levels by December 31, 2030.

This section evaluates whether the GHG emissions trajectory after project completion would impede the attainment of the 2030 and 2050 GHG reduction goals identified in EOs B-30-15 and S-3-05.

To begin, CARB has expressed optimism with regard to both the 2030 and 2050 goals. It states in the First Update to the Climate Change Scoping Plan that "California is on track to meet the near-term 2020 GHG emissions limit and is well positioned to maintain and continue reductions beyond 2020 as required by AB 32" (CARB 2014). With regard to the 2050 target for reducing GHG emissions to 80% below 1990 levels, the First Update to the Climate Change Scoping Plan states the following (CARB 2014):

> This level of reduction is achievable in California. In fact, if California realizes the expected benefits of existing policy goals (such as 12,000 megawatts of renewable distributed generation by 2020, net zero energy homes after 2020, existing building retrofits under AB 758, and others) it could reduce emissions by 2030 to levels squarely in line with those needed in the developed world and to stay on track to reduce emissions to 80% below 1990 levels by 2050. Additional measures, including locally driven measures and those necessary to meet federal air quality standards in 2032, could lead to even greater emission reductions.

In other words, CARB believes that the state is on a trajectory to meet the 2030 and 2050 GHG reduction targets set forth in AB 32, EO B-30-15, and EO S-3-05. This is confirmed in the 2017 Scoping Plan, which states (CARB 2017):

> The Scoping Plan builds upon the successful framework established by the Initial Scoping Plan and First Update, while identifying new, technologically feasible and cost-effective strategies to ensure that California meets its GHG reduction targets in a way that promotes and rewards innovation, continues to foster economic growth, and delivers improvements to the environment and public health, including in disadvantaged communities.

The project would not interfere with implementation of any of the above-described GHG reduction goals for 2030 or 2050 because the project would not exceed the SCAQMD's draft interim threshold of 3,000 MT CO_2e per year (SCAQMD 2008). This threshold was established based on the goal of AB 32 to reduce statewide GHG emissions to 1990 levels by 2020. Because the project would not exceed the threshold, this analysis provides support for the conclusion that the project would not impede the state's trajectory toward the above-described statewide GHG reduction goals for 2030 or 2050. In addition, the project would comply with laws and regulations that would reduce GHG emissions

Furthermore, the project would not conflict with the state's trajectory toward future GHG reductions. In addition, since the specific path to compliance for the state in regards to the long-term goals will likely require development of technology or other changes that are not currently known or available, specific additional mitigation measures for the project would be speculative and cannot be identified at this time. The project's consistency would assist in meeting the City's contribution to GHG emission reduction targets in California. With respect to future GHG targets under SB 32 and EO S-3-05, CARB has also made clear its legal interpretation that it has the requisite authority to adopt whatever regulations are necessary, beyond the AB 32 horizon year of 2020, to meet SB 32's 40% reduction target by 2030 and EO S-3-05's 80% reduction target by 2050; this legal interpretation by an expert agency provides evidence that future regulations will be adopted to continue the state on its trajectory toward meeting these future GHG targets.

Based on the above considerations, the project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs, and no mitigation is required. Thus, impacts associated with an applicable GHG plan, policy or regulation would be less than significant.

3.9 Hazards and Hazardous Materials

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

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☐	☒

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

Short-Term Construction Impacts

Less-Than-Significant Impact with Mitigation Incorporated. The 14.3-acre project site is currently comprised of vacant land located directly east of the I-110 Figueroa on- and off-ramps. The project parcel was the location of the former Gardena Valley Landfill No. 1 & 2. The Gardena Valley Landfill No. 1 & 2 operated from 1956 until 1959 and accepted approximately 75% residential municipal waste and 25% construction or industrial wastes. The industrial wastes allowed included crude oil-related wastes (crude oil and tank bottoms), paint sludge, auto wash sludge, latex, molasses, cutting oil, and other semi-liquids. The average thickness of the waste materials was found to be approximately 25 feet. The former landfill was capped with approximately 5 feet of soil.

Soil, landfill gas, landfill liquids, and groundwater on the project site have contained concentrations of contaminants above screening levels. A remedy for the landfill was chosen in the 1990s; however, it was never implemented. Land use restrictions were applied to the project site in 1989 that require Department of Health Services (now DTSC) approval of any excavation or construction of buildings at the project site.

Several previous investigations, including remedial investigations and feasibility studies for the waste and groundwater, human health risk assessment, and a remedial action plan (RAP) for the former landfill waste were completed. The RAP for the waste proposed the construction of a cover and the addition of a landfill gas collection system and flare. The remedial design document to implement the RAP was prepared in 1999; however, to date, closure of the landfill in accordance with the 1999 Remedial Design and other remedial documents (e.g., the groundwater remedial investigation and feasibility study) has not occurred.

In 2019, the project applicant entered into a voluntary oversight agreement with the DTSC to review the existing environmental documents for the project site and provide opinions on the site remediation needed in order to comply with the requirements of the land use restrictions and complete the project. DTSC oversight is currently ongoing.

Based on the project site's status as a former landfill facility, there is a potential that on-site construction workers could come into contact with soil, landfill gas, landfill liquids, and groundwater during any activities occurring below grade. As such, the DTSC will be consulted regarding planning and approach prior to commencing any of these activities.

In addition to the risk posed by contaminated soils during construction of the project, potentially hazardous materials would likely be handled on the project site. These materials would include gasoline, diesel fuel, lubricants, and other petroleum-based products used to operate and maintain construction equipment. Handling of these potentially hazardous materials would be temporary and would coincide with the short-term construction phase of the project.

Although these materials would likely be stored on the project site, storage would be required to comply with the guidelines set forth by each product's manufacturer and all applicable federal, state, and local regulations pertaining to the storage of hazardous materials. Consistent with federal, state, and local requirements, the transport of hazardous materials to and from the project site would be conducted by a licensed contractor. Any handling, transport, use, or disposal of hazardous materials would comply with all relevant federal, state, and local agencies and regulations, including the U.S. Environmental Protection Agency, the California DTSC, the California Occupational Safety and Health Administration, Caltrans, the Resource Conservation and Recovery Act, SCAQMD, and the Los Angeles County Certified Unified Program Agency.

Given the history of the project site, **MM-HAZ-1** and **MM-HAZ-2** are required. Consistent with **MM-HAZ-1**, project activities must adhere to the DTSC-approved RAP. **MM-HAZ-2** is also required to minimize risk to those working with and handling subsurface soils during the project construction phase.

MM-HAZ-1 Prior to, during, and following construction of the project, specified programs and actions recommended in the remedial action plan (RAP) and approved by the Department of Toxic Substances Control (DTSC) shall be implemented in accordance with the RAP. Any potential variation to the RAP's recommendations shall be discussed with and approved by the DTSC prior to implementation. Evidence of compliance with the RAP shall be provided in a timely manner to the City of Carson and available to review in the project file.

MM-HAZ-2 Before issuance of a grading permit, a licensed contractor shall prepare a hazardous materials contingency plan (HMCP) and submit the plan to the City of Carson. The purpose of the HMCP is to protect on-site construction workers and off-site receptors in the vicinity of the construction site. The HMCP shall describe the practices and procedures to be implemented to protect worker health in the event of an accidental release of hazardous materials, or if previously undiscovered hazardous materials are encountered during construction. The HMCP shall include items such as spill prevention, cleanup, and evacuation procedures. The HMCP shall help protect the public and workers by providing procedures and contingencies to help reduce exposure to hazardous materials.

Therefore, with the incorporation of mitigation, short-term construction impacts associated with the use, transport, and disposal of hazardous materials would be less than significant.

Long-Term Operational Impacts

Less-Than-Significant Impact. Potentially hazardous materials associated with project operations would include materials used during typical cleaning and maintenance activities. Although these potentially hazardous materials would vary, they would generally include household cleaning products, paints, fertilizers, and herbicides and pesticides. Many of these materials are considered household hazardous wastes, common wastes, and/or universal wastes by the U.S. Environmental Protection Agency, which

considers these types of wastes to be common to businesses and households and to pose a lower risk to people and the environment than other hazardous wastes when properly handled, transported, used, and disposed of (EPA 2020). Federal, state, and local regulations typically allow these types of wastes to be handled and disposed of with less stringent standards than other hazardous wastes, and many of these wastes do not have to be managed as hazardous waste. In addition, any potentially hazardous material handled on the project site would be limited in both quantity and concentrations, consistent with other similar industrial uses located in the City, and any handling, transport, use, and disposal would comply with applicable federal, state, and local agencies and regulations. Further, as mandated by the Occupational Safety and Health Administration (OSHA n.d.), all hazardous materials stored on the project site would be accompanied by a Material Safety Data Sheet, which would inform employees and first responders as to the necessary remediation procedures in the case of accidental release.

As discussed above, soil, landfill gas, landfill liquids, and groundwater on the project site have contained concentrations of contaminants above screening levels. While a remedy for the landfill was chosen in the 1990s, it was never implemented. Incorporation of **MM-HAZ-1** requires project activities to adhere to the DTSC-approved RAP. Pursuant to this mitigation measure, following construction of the project, specified programs and actions recommended in the RAP and approved by the DTSC will be implemented in accordance with the RAP, with any potential variation to the RAP's recommendations being discussed with and approved by the DTSC prior to implementation. In addition to provisions related to construction, the RAP and subsequent documentation approved by the DTSC will include requirements related to project design in an effort to protect employees. While the RAP and any DTSC-approved variations to the RAP will outline specific design requirements for the proposed warehouse/office building, in an abundance of caution, **MM-HAZ-3** will be required.

MM-HAZ-3 The proposed warehouse/office building and any other on-site habitable structure shall include a vapor mitigation system such as a vapor barrier, passive venting, and/or similar method. The design of the vapor mitigation system shall be approved by the Department of Toxic Substances Control (DTSC) as part of DTSC's review of the remedial action plan (RAP) and any approved variations to the RAP. Evidence of installation of the vapor mitigation system shall be provided to the City of Carson within 2 weeks of the completion of installation.

DTSC-approved performance measures shall be established to ensure that the vapor mitigation system is operating correctly and preventing unacceptable volatile chemical concentrations from migrating up and into the overlying structure. An operations and maintenance plan shall be prepared that identifies the performance measures and shall state the methods by which the performance goals will be tested and verified.

Therefore, with the incorporation of mitigation, long-term operational impacts associated with the use, transport, and disposal of hazardous materials would be less than significant.

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

Less-Than-Significant Impact with Mitigation Incorporated. Refer to response provided in Impact 3.9(a).

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?

No Impact. The nearest school to the project site is Van Deene Avenue Elementary School (826 Javelin Street), located approximately 0.3 miles southwest of the project site. In addition, the project would not emit hazardous air emissions or handle hazardous or acutely hazardous materials. Therefore, no impacts associated with emitting hazardous emissions or handling hazardous or acutely hazardous materials within 0.25 miles of school would occur.

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

No Impact. California Government Code Section 65962.5 requires the California Environmental Protection Agency to compile a list of hazardous waste and substances sites (Cortese List). While the Cortese List is no longer maintained as a single list, the following databases provide information that meets the Cortese List requirements (refer to the Preliminary Environmental Evaluation [Appendix D]):

1) List of Hazardous Waste and Substances sites from DTSC Envirostor database (Health and Safety Codes 25220, 25242, 25356, and 116395);
2) List of Open, Active Leaking Underground Storage Tank Sites by County and Fiscal Year from the State Water Resources Control Board GeoTracker database (Health and Safety Code 25295);
3) List of solid waste disposal sites identified by the State Water Resources Control Board with waste constituents above hazardous waste levels outside the waste management unit (Water Code Section 13273[e]; 14 CCR 18051);
4) List of "active" Cease and Desist Orders and Cleanup and Abatement Orders from the State Water Resources Control Board (Water Code Sections 13301 and 13304); and
5) List of hazardous waste facilities subject to corrective action pursuant to Section 25187.5 of the Health and Safety Code, identified by DTSC.

Despite the project site being a former landfill facility and having land use restrictions applied to it by DTSC, the site is not listed in the Cortese List databases. Therefore, no impacts associated with listing on the Cortese List would occur.

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

No Impact. The nearest airport to the project site is Compton/Woodley Airport, located approximately 3.5 miles northeast of the project site in the City of Compton. As such, the project would not be located within 2 miles of a public airport, and the project site is not within the Airport Influence Area for the airport (County of Los Angeles 2020b). Therefore, no impacts associated with airport safety hazards would occur.

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

No Impact. As discussed further in Section 3.17, Transportation, the project would not adversely affect operations on the local or regional circulation system, and as such, would not impeded the use of any nearby roadway as an emergency access routes. Site access would be provided via one 30-foot-wide driveway along Main Street and two driveways located along Figueroa Street. Emergency vehicle access would be available at all driveways and facilitated within the entirety of the project site. Exhibit SAF-5 in the City's General Plan Safety Element shows the location of collection points and evacuation routes for the City (City of Carson 2004). The project would not adversely affect circulation along any of the designated evacuation routes. Therefore, no impacts associated with an emergency response plan or emergency evacuation plan would occur.

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

No Impact. The project site is located in a highly developed part of the City and is surrounded by an urbanized mix of land uses. The project area lacks any lands considered wildlands or wildland–urban interfaces. According to the California Department of Forestry and Fire Services (CAL FIRE) Fire Hazard Severity Zones maps, the project site is neither moderately, highly, nor very highly susceptible to wildland fire (CAL FIRE 2020). Therefore, no impacts associated with wildland fires would occur.

3.10 Hydrology and Water Quality

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
X. HYDROLOGY AND WATER QUALITY – Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i) result in substantial erosion or siltation on or off site;	☐	☐	☒	☐

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off site;	☐	☐	☒	☐
iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	☐	☐	☒	☐
iv) impede or redirect flood flows?	☐	☐	☒	☐
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☒	☐
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐

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

Surface Water Quality

Less-Than-Significant Impact. Construction associated with the project involves earthwork activities that would potentially disturb soil. Although the project site is already disturbed and developed, soil erosion could result from such construction activities, thereby potentially affecting the water quality of local downstream waterways.

Because the project would disturb 1 or more acres of soil, the project is subject to the General Construction Permit. A Stormwater Pollution Prevention Plan (SWPPP) is required, as part of compliance with the NPDES Permit to ensure that water quality standards are met and that stormwater runoff from the construction work areas does not cause degradation of water quality in receiving water bodies. The SWPPP consists of BMPs designed to reduce and capture soil erosion, under the guidance of a qualified SWPPP practitioner. Sediment control BMPs may include stabilized construction entrances, sediment filters on existing inlets, or the equivalent to reduce erosion impacts. Implementation of the SWPPP and incorporation of BMPs would ensure proper measures are in place to prevent, to the extant feasible, stormwater runoff conveying sediments to downstream receiving waters.

In addition, upon completion of construction, all exposed areas would be paved with new asphalt and structures. Overall, once operational, the project would have decreased the amount of exposed soils on the project site, which would correspond with a reduction in the potential for erosion. Therefore, impacts associated with surface water quality would be less than significant.

Groundwater Quality

Less-Than-Significant Impact. BMPs required by the NPDES General Construction Permit would include spill prevention and cleanup guidelines, dewatering operations guidelines, and stormwater run-on prevention. These BMPs would protect the groundwater from contamination by construction activities. During normal operations, groundwater quality would be protected, as the entire site would be covered by the impervious surfaces, preventing opportunity of pollutant intrusion into the groundwater system. Therefore, impacts associated with groundwater quality would be less than significant.

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

Groundwater Supplies

Less-Than-Significant Impact. The project site would receive its water supply from the Rancho Dominguez District of California Water Service (Cal Water). Based on the 2015 Urban Water Management Plan (UWMP), the Dominguez District receives its water from 17% groundwater, 15% recycled water, and 68% purchased water. Purchased water is delivered from four Metropolitan Water District distribution feeders (Cal Water 2016).

Cal Water uses local groundwater for the City from the West Coast Basin and the Central Basin, and the project would rely on groundwater supplies from these two basins. However, the Water Replenishment District of Southern California actively manages water resources in the area to ensure that a reliable supply of groundwater is available. Therefore, impacts associated with groundwater supplies would be less than significant.

Groundwater Recharge

Less-Than-Significant Impact. Under existing conditions, the project site is a vacant parcel that was once an origin landfill facility. As such, due to its former use, which has contaminated the project site, the parcel is not considered an important location for groundwater recharge, and the project would not substantially impair groundwater recharge necessary to replenish the City's water supply. Therefore, impacts associated with groundwater recharge would be less than significant.

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

i) result in substantial erosion or siltation on or off site;

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

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

iv) impede or redirect flood flows?

Less-Than-Significant Impact. Because the project would disturb 1 or more acres of soil, the project is subject to the General Construction Permit. A SWPPP is required, as part of compliance with the

NPDES Permit, to ensure that water quality standards are met and that stormwater runoff from the construction work areas does not cause degradation of water quality in receiving water bodies. The SWPPP consists of BMPs designed to reduce and capture soil erosion, under the guidance of a qualified SWPPP practitioner. Sediment control BMPs may include stabilized construction entrances, sediment filters on existing inlets, or the equivalent to reduce erosion impacts. Implementation of the SWPPP and incorporation of BMPs would ensure proper measures are in place to prevent, to the extant feasible, stormwater runoff conveying sediments to downstream receiving waters.

In addition, upon completion of construction, all exposed areas would be paved with new asphalt and structures. Overall, once operational, the project would have decreased the amount of exposed soils on the project site while increasing the amount of impervious surfaces found on the project site. This increase in impervious surfaces would inevitably have an effect on the existing drainage patterns that are currently found on site. However, consistent with the City's requirements, site drainage plans and a hydrology/drainage study would have to the prepared and provided to the City Public Works Department for review and approval prior to issuance of building permits. The drainage plans and a hydrology/drainage study would have to show that although the project would impact the existing on-site drainage patterns, this change would not lead to erosion or siltation, increase the rate or amount of surface runoff, create or contribute runoff water that would exceed the capacity of stormwater drainage systems, or impede flood flows. Therefore, impacts associated with the altering of existing drainage patterns would be less than significant.

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

Less-Than-Significant Impact. Due to the project site's inland location and the lack of nearby bodies of water, the project would not be susceptible to tsunami or seiche. In addition, according to the Federal Emergency Management Agency Flood Insurance Rate Map for the project area (FEMA FIRM Panel 06037C1935F), the project site is located outside of both the "1% Annual Chance Flood Hazard" (i.e., 100-year floodplain) and "0.2% Annual Chance Flood Hazard" (i.e., 500-year floodplain) (FEMA 2008). Therefore, impacts associated with flood hazard, tsunami, or seiche 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?

Less-Than-Significant Impact. Refer to responses provided to Impact 3.10(a) and Impact 3.10(b).

3.11 Land Use and Planning

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

a) Would the project physically divide an established community?

No Impact. The physical division of an established community typically refers to the construction of a linear feature (such as a major highway or railroad tracks) or removal of a means of access (such as a local road or bridge) that would impair mobility within an existing community or between a community and outlying area. Under the existing condition, the project site is not used as a connection between established communities. Instead, connectivity within the area surrounding the project site is facilitated via local roadways and sidewalks. Therefore, no impacts associated with physical division of an established community would occur.

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

Less-Than-Significant Impact. The project site is zoned ML-ORL-D (Manufacturing, Light with Organic Refuse Landfill and Design overlays) with a General Plan Land Use Designation of Mixed Use – Business Park (City of Carson 2017). The project site is bounded by Main Street to the east, existing commercial and office development and Torrance Boulevard to the south, Figueroa Street and I-110 to the west, and a stormwater culvert, industrial/self-storage operation, and Del Amo Boulevard to the north.

As part of the approvals being requested for the project, the City would consider adopting the Specific Plan. To ensure consistency between the Specific Plan and the City's General Plan, the General Plan would be amended concurrent with adoption of the Specific Plan for the project. The corresponding General Plan amendment would establish a "Heavy, Manufacturing" land use designation for the project site to replace the site's existing "Mixed Use – Business Park" General Plan designations. Given that the project involves the construction and operation of a cargo container parking facility, among other accessory uses, the project would be consistent with the "Heavy, Manufacturing" land use designation upon approval of the Specific Plan and would not conflict with an applicable land use plan, policy, or regulation.

Table 9 lists applicable goals and policies from the General Plan and includes a discussion of whether the project is consistent with those goals and policies.

Table 9. General Plan Consistency

General Plan Goal or Policy		Is the Project Consistent?
Land Use and Planning Element		
Goal: LU-6:	A sustainable balance of residential and non-residential development and a balance of traffic circulation throughout the City.	**Consistent.** The project involves the construction and operation of a cargo container parking facility, which would be used to mobilize both imported and exported goods that pass through the Ports of Los Angeles and Long Beach. The majority of project truck traffic would both exit and enter the adjacent I-110 without having to traverse past residential or other land uses. The City has designated truck routes where vehicles in excess of 3 tons may travel. The purpose of regulating truck routes is to provide access for large trucks on streets designed to accommodate them and to protect residential streets from unwanted truck traffic. Del Amo Street, Main Street, Figueroa Boulevard, and Torrance Boulevard, which surround the project site, are designated truck routes (City of Carson 2019). The project would traverse the adjacent streets, which is the intention of the City in an effort to minimize truck traffic effects on non-industrial uses. Approval of the project would require Site Plan and Design Review to ensure the project does not conflict with applicable zoning and other regulations governing scenic quality. This project would ensure that the project would comply with applicable development standards in the City's Zoning Ordinance, which would help ensure visual consistency with the existing character of the surrounding area.
Policy: LU-6.8	Manage truck-intensive uses.	
Goal: LU-7	Adjacent land uses that are compatible with one another.	
Policy: LU-7.2	Locate truck intensive uses in areas where the location and circulation pattern will provide minimal impacts on residential and commercial uses.	
Policy: LU-7.6	Coordinate with adjacent landowners, cities and the County in developing compatible land uses for areas adjacent to the City's boundaries.	**Consistent.** The project site is located approximately 400 feet east of unincorporated Los Angeles County. However, the project site is immediately bounded by Figueroa Street and I-110, which provide a buffer between the project and County land, ensuring that land use conflicts do not occur.

Table 9. General Plan Consistency

General Plan Goal or Policy		Is the Project Consistent?
Traffic Element		
Goal: TI-1	Minimize impacts associated with truck traffic through the City, as well as the truck parking locations.	**Consistent.** The project involves the construction and operation of a cargo container parking facility, which would be used to mobilize both imported and exported goods that pass through the Ports of Los Angeles and Long Beach. The majority of project truck traffic would both exit and enter adjacent I-110 without having to traverse past residential or other land uses. The City has designated truck routes where vehicles in excess of 3 tons may travel. The purpose of regulating truck routes is to provide access for large trucks on streets designed to accommodate them and to protect residential streets from unwanted truck traffic. Del Amo Street, Main Street, Figueroa Boulevard, and Torrance Boulevard, which surround the project site, are designated truck routes (City of Carson 2019). The project would traverse the adjacent streets, which is the intention of the City in an effort to minimize truck traffic effects on non-industrial uses.
Policy: TI-1.1	Enforce the City's revised truck route system.	
Policy: TI-1.2	Devise strategies to protect residential neighborhoods from truck traffic.	
Goal: TI-2	Provide a sustainable, safe, convenient and cost-effective circulation system to serve the present and future transportation needs of the Carson community	**Consistent.** Based on the qualitative VMT analysis conducted for the project (Appendix F), the following conclusions regarding traffic and circulation were made: The project would operate a cargo container parking facility for transferring goods, or breaking down and assembling tractor-trailer transportation, for goods destined to/from the local Ports of Los Angeles and Long Beach. The project is an intermediary land use between the Ports and the next/final destination (warehouses) of the products shipped through the trucks-trailers utilizing the project. The location of the project is strategic for a cargo container parking facility as it is located close to freeway on- and off-ramps located across Figueroa Street, a frontage road to I-110, which provides direct access to the Ports, and also connects the site to other regionally significant freeways such as Interstate 405 (I-405), Interstate 710 (I-710), and State Route 91 (SR-91). The location of the project site reduces the need for trucks to travel along other roadways from other truck facilities that may be further away from regional freeways. This diversion from other truck facilities would reduce the VMT generated by those trucks. The project would implement the Project Design Features to promote the use of alternative transportation such as transit, ride-sharing, bicycling, and walking to further reduce project trips and/or vehicle miles traveled. Therefore, based on the project's proximity to I-110, which provides direct access to other regional
Policy: TI-2.5	Facilitate cooperation between the City and the transportation agencies serving the region in order to provide adequate regional vehicular traffic volumes and movements on freeways, streets and through intersections.	

Table 9. General Plan Consistency

General Plan Goal or Policy		Is the Project Consistent?
		significant freeway facilities; the project's potential to divert truck traffic from other truck facilities located further away from regional freeway facilities; and the requirement to implement VMT-reducing Project Design Features, the project would have a less-than-significant impact to vehicle miles traveled.
Policy: TI-2.7	Provide all residential, commercial and industrial areas with efficient and safe access to major regional transportation facilities	**Consistent.** The project site is accessible via I-405, located 0.5 miles to the east, and I-110 adjacent to the west. Site access will be provided via one 30-foot-wide driveway located along Main Street and two driveways located along Figueroa Street.
Traffic Element		
Goal: N-1	Maximize efficiency in noise abatement efforts through clear and effective policies, plans and ordinances.	**Consistent.** With the incorporation of both Project Design Features and mitigation measures, the project would comply with the City's Noise Ordinance to reduce noise impacts during construction and operation of the project.
Policy: N-1.1	Continue to implement the City's Noise Ordinance and Noise Control Program.	
Goal: N-2	Minimize noise impacts on residential uses and noise sensitive receptors along the City's streets, ensuring that the City's interior and exterior noise levels are not exceeded.	
Policy: N-2.1	Limit truck traffic to specific routes and designated hours of travel, where necessary, as defined in the Transportation and Infrastructure Element and by the City's Development Services Group. Said routes and hours shall be reviewed periodically to ensure the protection of sensitive receptors and residential neighborhoods.	**Consistent.** The project involves the construction and operation of a cargo container parking facility, which would be used to mobilize both imported and exported goods that pass through the Ports of Los Angeles and Long Beach. The majority of project truck traffic would both exit and enter the adjacent I-110 without having to traverse past residential or other land uses. The City has designated truck routes where vehicles in excess of three tons may travel. The purpose of regulating truck routes is to provide access for large trucks on streets designed to accommodate them and to protect residential streets from unwanted truck traffic. Del Amo Street, Main Street, Figueroa Boulevard, and Torrance Boulevard, which surround the project site, are designated truck routes (City of Carson 2019). The project would traverse the adjacent streets, which is the intention of the City in an effort to minimize truck traffic effects on non-industrial uses.
Policy: N-2.5	Discourage through traffic in residential neighborhoods.	

Table 9. General Plan Consistency

General Plan Goal or Policy		Is the Project Consistent?
Policy: N-7.2	Continue to incorporate noise assessments into the environmental review process, as needed. Said assessments shall identify potential noise sources, potential noise impacts, and appropriate sound attenuation. In non-residential projects, potential noise sources shall include truck pick-up and loading areas, locations of mechanical and electrical equipment, and similar noise sources. Require mitigation of all significant noise impacts as a condition of project approval.	**Consistent.** A Noise Analysis memorandum (Appendix E) has been prepared to evaluate the impact of noise resulting from construction and operation of the project. The analysis found that with the incorporation of both Project Design Features and mitigation measures, the project would comply with the City's Noise Ordinance to reduce noise impacts during construction and operation of the project.
Air Quality Element		
Goal: AQ-1	Reduced particulate emissions from paved and unpaved surfaces and during building construction.	**Consistent.** Under existing conditions, the project site is vacant land covered in dirt and dry grasses. Upon completion of construction, the project site would be entirely paved, which would reduce the potential for particulate emissions through wind erosion. In addition, during construction the project would be required to comply with SCAQMD Rule 403 (SCAQMD 2015) to control dust emissions generated during any dust-generating activities. Standard construction practices that would be employed to reduce fugitive dust emissions include watering of the active dust areas up to three times per day, depending on weather conditions.
Policy: AQ-1.1	Continue to enforce ordinances which address dust generation and mandate the use of dust control measures to minimize this nuisance.	
Policy: AQ-1.2	Promote the landscaping of undeveloped and abandoned properties to prevent soil erosion and reduce dust generation.	**Consistent.** Under existing conditions, the project site is vacant land covered in dirt and dry grasses. Upon completion of construction, the project site would be entirely paved, which would reduce the potential for particulate emissions through wind erosion. In addition, a minimum 25-foot-wide landscape setback will be provided on Main Street and a minimum 20-foot-wide landscape setback will be provided on Figueroa Street.
Goal: AQ-2	Air quality which meets State and Federal standards.	**Consistent.** As discussed in Section 3.3(b), Air Quality, the SCAB has been designated as a federal nonattainment area for O_3 and $PM_{2.5}$, and a state nonattainment area for O_3, PM_{10}, and $PM_{2.5}$. The nonattainment status is the result of cumulative emissions from various sources of air pollutants and their precursors within the SCAB, including motor vehicles, off-road equipment, and commercial and industrial facilities. Construction and operational activities of the project would generate VOC and NO_x

Table 9. General Plan Consistency

General Plan Goal or Policy		Is the Project Consistent?
		emissions (precursors to O_3) and emissions of PM_{10} and $PM_{2.5}$. However, project-generated emissions would not exceed the SCAQMD emission-based significance thresholds for VOCs, NO_x, PM_{10}, or $PM_{2.5}$.
Policy: AQ-2.1	Coordinate with other agencies in the region, particularly SCAQMD and SCAG, to implement provisions of the regions' AQMP, as amended.	**Consistent.** The project site is located within the SCAB under the jurisdiction of the SCAQMD, which is the local agency responsible for administration and enforcement of air quality regulations for the area. The SCAQMD has established criteria for determining consistency with the AQMP, currently the 2016 AQMP, in Chapter 12, Sections 12.2 and 12.3, in the SCAQMD CEQA Air Quality Handbook (SCAQMD 1993). The project would not result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations, and implementation of the project would be not exceed the demographic growth forecasts in the SCAG 2016 RTP/SCS; therefore, the project would also be consistent with the SCAQMD 2016 AQMP.
Policy: AQ-2.2	Utilize incentives, regulations and implement the Transportation Demand Management requirements in cooperation with other jurisdictions to eliminate vehicle trips which would otherwise be made and to reduce vehicle miles traveled for automobile trips which still need to be made.	**Consistent.** Based on the qualitative VMT analysis conducted for the project (Appendix F), the following conclusions regarding traffic and circulation were made: • The project would operate a cargo container parking facility for transferring goods, or breaking down and assembling tractor-trailer transportation, for goods destined to/from the local Ports of Los Angeles and Long Beach. The project is an intermediary land use between the Ports and the next/final destination (warehouses) of the products shipped through the trucks-trailers utilizing the project. • The location of the project is strategic for a cargo container parking facility as it is located close to freeway on- and off-ramps located across Figueroa Street, a frontage road to I-110, which provides direct access to the Ports, and also connects the site to other regionally significant freeways such Interstate 405 (I-405), Interstate 710 (I-710), and State Route 91 (SR-91). The location of the project site reduces the need for trucks to travel along other roadways from other truck facilities that may be further away from regional freeways. This diversion from other truck facilities would reduce the VMT generated by those trucks. • The project would implement the Project Design Features to promote the use of alternative transportation such as transit, ride-sharing, bicycling, and walking to further reduce project trips and/or VMT.

Table 9. General Plan Consistency

General Plan Goal or Policy		Is the Project Consistent?
		• Therefore, based on the project's proximity to I-110, which provides direct access to other regional significant freeway facilities; the project's potential to divert truck traffic from other truck facilities located further away from regional freeway facilities; and, the requirement to implement VMT-reducing Project Design Features, the project would have a less-than-significant impact to VMT.
Policy: AQ-2.6	Encourage in-fill development near activity centers and along transportation routes.	**Consistent.** The project involves the construction and operation of a cargo container parking facility, which would be used to mobilize both imported and exported goods that pass through the Ports of Los Angeles and Long Beach. The majority of project truck traffic would both exit and enter the adjacent I-110 without having to traverse past residential or other land uses. The City has designated truck routes where vehicles in excess of three tons may travel. The purpose of regulating truck routes is to provide access for large trucks on streets designed to accommodate them and to protect residential streets from unwanted truck traffic. Del Amo Street, Main Street, Figueroa Boulevard, and Torrance Boulevard, which surround the project site, are designated truck routes (City of Carson 2019). The project would traverse the adjacent streets, which is the intention of the City in an effort to minimize truck traffic effects on non-industrial uses.
Policy: AQ-2.7	Reduce air pollutant emissions by mitigating air quality impacts associated with development projects to the greatest extent possible.	**Consistent.** An Air Quality and Greenhouse Gas Emissions Analysis Technical Report (Appendix A) was prepared for the project to determine project-related air pollutant emissions and the recommended mitigation measures to reduce air quality impacts to less –than-significant.

As provided in Table 9, the project would be consistent with the applicable General Plan goals and policies, and because, the project involves the construction and operation of a cargo container parking facility, among other accessory uses, the project would be consistent with the "Heavy, Manufacturing" land use designation upon approval of the Specific Plan and would not conflict with an applicable land use plan, policy, or regulation. Therefore, impacts associated with land use consistency would be less than significant.

3.12 Mineral Resources

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

a) 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?

No Impact. According to the California Department of Conservation and California Geological Survey, the project site is within a Mineral Resource Zone 3 (MRZ-3) zone, which is defined as an area containing mineral deposits for which the significance cannot be determined from available data (DOC 1982). Although the broader project area has historically been used for oil exploration, such activities have since ceased in the project area. In addition, according to the City's General Plan EIR, there are no known mineral resources located within the City (City of Carson 2002). Therefore, no impacts associated with loss of availability of a known mineral resource would occur.

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

No Impact. Refer to response provided to Impact 3.12(a).

3.13 Noise

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XIII. NOISE – Would the project result in:				
a) Generation of a substantial temporary 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?	☐	☒	☐	☐

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

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

Short-Term Construction Impacts

Less-Than-Significant Impact with Mitigation Incorporated. Construction of the project would generate noise that could expose nearby receptors to elevated noise levels that may disrupt communication and routine activities. The magnitude of the impact would depend on the type of construction activity, equipment, duration of the construction, distance between the noise source and receiver, and intervening structures. The following discussion addresses the noise levels estimated to result from construction of the project at nearby sensitive receptors (i.e., residences).

CalEEMod was used to identify the construction equipment anticipated for development of the project. Based on this information, CalEEMod identified the anticipated equipment for each phase of project construction, listed in Table 10.

Table 10. Construction Equipment by Phase

Construction Phase	Equipment	Quantity
Site Preparation	Rubber Tired Dozers	2
Grading	Rollers	2
	Graders	2
	Rubber Tired Dozers	2
Building Construction	Cranes	1
	Forklifts	3
	Generator Sets	1
	Tractors/Loaders/Backhoes	3
	Welders	1
Paving	Cement and Mortar Mixers	2
Trenching	Excavators	2
	Bore/Drill Rigs	2

Table 10. Construction Equipment by Phase

Construction Phase	Equipment	Quantity
Architectural Coating	Aerial Lifts	2

Source: Appendix A (Air Quality and Greenhouse Gas Analysis Technical Report).

With the construction equipment noise sources identified in Table 10, a noise analysis was performed using the Federal Highway Administration's Roadway Construction Noise Model (RCNM) (FHWA 2008). Input variables for RCNM consist of the receiver/land use types, the equipment type (e.g., backhoe, grader, scraper), the number of equipment pieces, the duty cycle for each piece of equipment (i.e., percentage of time the equipment typically works in a given time period), and the distance from the noise-sensitive receiver to the construction zone. The RCNM has default duty cycle values for the various pieces of equipment, which were derived from an extensive study of typical construction activity patterns. Those default duty cycle values were utilized for this analysis.

Sensitive receptors near the project site include residential uses to the east and churches located to the south. The City's Noise Ordinance contains a construction noise restriction that pertains specifically to single-family residences. Where construction would have a duration greater than 21 days, construction noise levels are restricted to 65 A-weighted decibel (dBA) equivalent continuous sound level (L_{eq}) during the daytime at any single-family residence in the proximity of the construction effort (Section 5500 of the City of Carson Municipal Code). The results of the construction noise analysis using the RCNM are summarized in Table 11. As shown, the noise levels from construction are predicted to range from approximately 63 dBA L_{eq} (during the architectural coating phase) to 78 dBA L_{eq} (during the grading phase) at the nearest noise-sensitive receivers (i.e., the residences and the churches, each located approximately 110 feet from the closest point of construction). These noise levels would be higher than ambient noise levels in the area, and would be greater than the City's 65 dBA L_{eq} construction noise standard. Therefore, mitigation would be required to avoid a potentially significant short-term construction noise impact at the single-family residences east of the project site and at the churches to the south.

Table 11. Construction Noise Analysis Summary

Construction Phase	Construction Noise at Representative Receiver Distances (L_{eq} [dBA])			
		Residences to the East		*Nearest Church to the South*
	Nearest Source/Receiver Distance (Approx. 110 feet)[1]	*Typical Source/Receiver Distance (Approx. 400 feet)*[2]	*Nearest Source/Receiver Distance (Approx. 110 feet)*[3]	*Typical Source/Receiver Distance (Approx. 330 feet)*[4]
Site Preparation	73	63	73	64
Grading	78	68	78	70
Trenching	73	63	73	65
Building Construction	71	69	61	60
Paving	70	60	70	61
Architectural Coating	63	53	63	54

Source: Appendix E.
Notes: Leq = equivalent continuous sound level (time-averaged sound level); dBA = A-weighted decibel.

1 The exception is for the building construction phase, for which the nearest source/receiver distance is approximately 200 feet.
2 The exception is for the building construction phase, for which the typical source/receiver distance is approximately feet.
3 The exception is for the building construction phase, for which the nearest source/receiver distance is approximately feet.
4 The exception is for the building construction phase, for which the typical source/receiver distance is approximately feet.

The following mitigation measures would reduce noise impacts of the project to sensitive receivers during construction.

MM-NOI-1 At least 30 days prior to commencement of construction, the contractor shall provide written notice to all residential property owners and tenants within 300 feet of the project site that proposed construction activities could affect outdoor or indoor living areas. The notice shall contain a description of the project, a construction schedule including days and hours of construction, and a description of noise-reduction measures.

MM-NOI-2 Noise-generating construction activities (which may include preparation for construction work) shall be permitted weekdays between 7:00 a.m. and 6:00 p.m., excluding federal holidays. When a holiday falls on a Saturday or Sunday, the preceding Friday or following Monday, respectively, shall be observed as a legal holiday.

MM-NOI-3 Stationary construction equipment that generates noise that exceeds 85 A-weighted decibels at the property boundaries shall be shielded with a barrier that meets a Sound Transmission Class rating of 25.

MM-NOI-4 All construction equipment powered by internal combustion engines shall be properly muffled and maintained. No internal combustion engine shall be operated on the site without a muffler. All diesel equipment shall be operated with closed engine doors and shall be equipped with factory recommended mufflers. Unnecessary idling of internal combustion engines shall be prohibited.

MM-NOI-5 Air compressors and generators used for construction shall be surrounded by temporary acoustical shelters. Whenever feasible, electrical power shall be used to run air compressors and similar power tools.

MM-NOI-6 A temporary construction sound barrier wall shall be installed along the easterly and southerly project site boundaries. Entry gates for construction vehicles shall be closed when vehicles are not entering or exiting the site. The barrier shall be made of sound-attenuating material (not landscaping). To effectively reduce sound transmission through the barrier, the material chosen must be rigid and sufficiently dense (at least 20 kilograms per square meter). All noise barrier material types are equally effective, acoustically, if they have this density. For example, 5/8-inch plywood, mounted with no gaps between adjacent sheets, would be of sufficient density to achieve the target attenuation. The barrier shall be 8 feet in height from the ground surface on the construction side of the wall to achieve the goal of blocking direct line of sight to the adjacent residence windows. It is estimated that a noise barrier of the prescribed density would reduce average noise levels to sensitive receptors by approximately 8 A-weighted decibels or more by blocking direct line of sight to ground-level receptors.

The above mitigation measures would reduce construction noise levels at the nearest residences to be in compliance with the City's Noise Ordinance limit of 65 dBA L_{eq} during daytime hours, and would similarly reduce the construction noise exposure at the churches to the south. Therefore, with implementation of mitigation, short-term construction noise impacts would be less than significant.

Long-Term Operational Impacts

Traffic Noise

Less-Than-Significant Impact. The project has the potential to result in significant off-site noise impacts from project-related traffic at nearby noise-sensitive land uses. Based upon information from Dudek transportation specialists (Appendix F), during the AM peak hour, implementation of the project would result in a total of 48 passenger vehicles, 6 2-axle trucks, 15 3-axle trucks, and 35 4-or-more axle trucks. During the PM peak hour, implementation of the project would result in a total of 46 passenger vehicles, 6 2-axle trucks, 14 3-axle trucks, and 34 4-or-more axle trucks. In terms of average daily trips, the project would generate approximately 546 passenger vehicle trips, 72 2-axle truck trips, 165 3-axle truck trips, and 404 4-or-more axle truck trips. However, all truck trips would access and exit the project site to the west, via Figueroa Boulevard, where no noise-sensitive land uses exist, and the majority of the truck trips would then leave the project area via the adjacent the I-110 on- and off-ramps.

Potential noise effects from vehicular traffic were assessed using the Federal Highway Administration's Traffic Noise Model Version 2.5 (FHWA 2004). Information used in the model included the Existing, Existing plus Project, Year 2021, and Year 2021 plus Project traffic volumes. Noise levels were modeled at representative noise-sensitive receivers. The receivers were modeled to be 5 feet above the local ground elevation. The six receiver locations used for the short-term noise measurements were used to represent existing off-site noise-sensitive land uses (residences and churches) (Figure 4, Noise Measurement Locations). The measured and modeled receiver locations are presented in Table 12.

The information provided from this modeling, along with the results from ambient noise survey measurements, was compared to the noise impact significance criteria to assess whether project-related traffic noise would cause a significant impact and, if so, where these impacts would occur. The results of the comparisons for the off-site noise-sensitive land uses are summarized in Table 12.

Table 12. Summary of Off-Site Existing and Future (Year 2021) Unmitigated Traffic Noise Levels (dBA CNEL)

Modeled Receptor	Existing	Existing plus Project	Future (Year 2021)	Future (Year 2021) plus Project	Maximum Project-Related Noise Level Increase (dB)
ST1 - South of project site, adjacent to Mission Ebenezer Family Church	66	66	66	66	0
ST2 - South of project site, adjacent to Glory Christian Fellowship Church	70	70	72	72	0

Table 12. Summary of Off-Site Existing and Future (Year 2021) Unmitigated Traffic Noise Levels (dBA CNEL)

Modeled Receptor	Existing	Existing plus Project	Future (Year 2021)	Future (Year 2021) plus Project	Maximum Project-Related Noise Level Increase (dB)
ST3 - East of project site, adjacent to residences at 20630 Main Street	73	73	74	74	0
ST4 - Southeast of project site, adjacent to residences at 20832 Main Street	72	72	73	73	0
ST5 - Southeast of project site, adjacent to church at 20926 Main Street	72	72	73	73	0
ST6 - Southwest of project site, adjacent to residences at 20802 Conrad Avenue	72	72	72	72	0

Source: Appendix E.
Notes: dBA = A-weighted decibel; CNEL = Community Noise Equivalent Level; dB = decibel.
Traffic noise levels are rounded to the nearest whole numbers.

As shown in Table 12, the project would increase the traffic noise levels along the nearby arterial roadways by 0 dBA (when rounded to whole numbers). A change (either an increase or a decrease) of 1 dB or less is not an audible change in the context of community noise (i.e., outside of a controlled test environment). In addition, the project would not cause noise levels to exceed applicable City noise standards. The project is not anticipated to result in significant traffic noise increases or cause an exceedance of applicable traffic noise standards. Therefore, impacts associated with off-site traffic noise would be less than significant.

On-Site Operational Noise

Less-Than-Significant Impact. The principal use of the project would be for transferring goods or breaking down and assembling tractor-trailer transportation. The project would include construction of a new building for warehouse/office use, loading docks located on the west side of that structure, parking spaces for the proposed warehouse/office use, spaces for cargo containers, and designated exterior and interior areas for the unloading and loading of goods between containers. The warehouse/office building would face the Main Street frontage; the building would act as a visual and acoustical screen for properties located to the east of this site. In so doing, the building would also visually and acoustically screen project activities, including truck maneuvering and loading/unlading activities.

Implementation of the project would result in changes to existing noise levels on the project site by developing new stationary sources of noise, including introduction of outdoor heating, ventilation and air conditioning (HVAC) equipment, and vehicle parking lot and truck loading dock activities. These sources may affect noise-sensitive vicinity land uses off the project site. The following analysis evaluates noise from exterior mechanical equipment and activities associated with vehicle parking lots and truck loading docks.

Outdoor Mechanical Equipment

The proposed warehouse space within the warehouse/office building would not be served by heating or air conditioning equipment. However, the proposed office area would be equipped with single-packaged rooftop HVAC units with air-handling capacity of 20 to 60 nominal tons. For the analysis of noise from HVAC equipment operation, a Carrier WeatherMaker A HVAC unit was used as a reference.

Noise level data provided by the manufacturer was used to determine the noise levels that would be generated by the HVAC equipment. Based on the warehouse/office building's roof design, there will be a 6-foot-high parapet extending along the perimeter of the office roof. Assuming that the HVAC equipment is operating for a minimum period of 1 hour, the worst-case calculated noise levels at the nearest residential property line (to the east) and the southernmost commercial property line (to the south) are presented in Table 13. The calculation was performed at the worst-case location of each of the two subject property lines—that is, the closest distance between the potential office location and the adjacent property lines to the east and south, to ensure that the shortest distance from equipment to property line was examined. The maximum hourly noise level for the HVAC equipment operating at each examined point along the property would range from approximately 38 dBA L_{eq} at the southerly (commercial) property boundary to 40 dBA L_{eq} at the nearest eastern (residential) property boundary. These levels are less than the City's noise standards for commercial (60 dBA L_{eq} daytime [7:00 a.m. to 10:00 p.m.], 55 dBA L_{eq} nighttime [10:00 p.m. to 7:00 a.m.]) and residential (50 dBA L_{eq} daytime [7:00a.m. to 10:00 p.m.], 45 dBA L_{eq} nighttime (10:00 p.m. to 7:00 a.m.] and are well below the measured ambient noise levels in the project area.

Table 13. Mechanical Equipment (HVAC) Noise

Equipment	Noise Level at Property Boundary	
	Property Line	*Average Noise Level (dBA Leq)*
HVAC	East	40
HVAC	South	38

Source: Appendix E.
Note: HVAC = heating, ventilation and air conditioning; dBA = A-weighted decibel; Leq = equivalent continuous sound level.

The results of the mechanical equipment operations noise analysis indicate that the project would comply with the City's noise ordinance. Mechanical equipment operation would result in noise at the project site property boundaries/nearest noise-sensitive receiver boundaries that are less than the applicable noise standards. Therefore, impacts associated with on-site HVAC noise would be less than significant.

Parking Lot Activity

A comprehensive study of noise levels associated with surface parking lots was published in the Journal of Environmental Engineering and Landscape Management (Baltrënas et al. 2004). The study found that average noise levels during the peak period of use of the parking lot (generally in the morning with arrival of commuters, and in the evening with the departure of commuters), was 47 dBA at 1 meter (3.28 feet) from the outside boundary of the parking lot. The parking area would function as a point source for noise, which means that noise would attenuate at a rate of 6 dBA with each doubling of distance. The employee parking lot is proposed to be

situated on the north and east sides of the warehouse building, no closer than 25 feet from the easterly[7] property line of the project site (and approximately 125 feet from the edge of the parking lot to the nearest residences to the east). At a distance of 25 feet, parking lot noise levels would be no greater than 30 dBA L_{eq} at the eastern property line, and approximately 15 dBA L_{eq} at the nearest residential area. This noise level is well below both the noise levels from the project-related HVAC equipment operation at the residential area to the east (40 dBA L_{eq}). The combination of the parking lot noise (15 dBA L_{eq}) and the HVAC equipment level (40 dBA L_{eq}), would be 40 dBA L_{eq}[8], which is less than the City's residential exposure limits of 50 dBA L_{eq} daytime (7:00 a.m. to 10:00 p.m.) and 45 dBA L_{eq} nighttime (10:00 p.m. to 7:00 a.m.). Therefore, impacts associated with parking lot noise would be less than significant.

Truck Loading Dock/Truck Yard Activity

The aforementioned parking lot study (Baltrënas et al. 2004) also examined noise levels associated with cargo truck delivery activity. The study concluded that average noise levels from truck loading/unloading areas was 96 dBA at 1 meter (3.28 feet) from the boundary of the truck activity area. Truck loading docks would be located not closer than 340 feet from the nearest residential property line (located to the east), and 155 feet from the southern property line. Using the outdoor attenuation rate of 6 dBA with each doubling of distance, truck loading activity at residences to the east would produce noise levels of approximately 56 dBA L_{eq}, while noise levels along the southern property boundary from truck loading activity would average 63 dBA L_{eq}. However, the proposed warehouse/office building would provide a substantial amount of noise reduction by blocking the direct line-of-sight between the truck loading dock area and the residences to the east. Because of the height and size of the building, it is estimated that the noise from loading dock activities would be reduced by approximately 22 dB or more. Thus, the loading dock noise at the nearest residences would be approximately 34 dBA L_{eq}, which would be well below the City's residential exposure limits of 50 dBA L_{eq} daytime (7:00 a.m. to 10:00 p.m.) and 45 dBA L_{eq} nighttime (10:00 p.m. to 7:00 a.m.).

At the commercial property boundary to the south, the estimated noise level would be exceeded in the absence of the 8-foot-high boundary wall; however, the wall would provide approximately 12 dB noise reduction near the project's southern boundary. The resulting noise level would be approximately 51 dBA L_{eq}, which would be less than the City's daytime (7:00 a.m. to 10:00 p.m.) noise standard for commercial land use of 60 dBA L_{eq}, as well as the nighttime (10:00 p.m. to 7:00 a.m.) noise standard of 55 dBA L_{eq}. The project would have operational noise levels less than the applicable noise standards; therefore, impacts associated with truck loading docks and truck yard noise would be less than significant.

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

Less-Than-Significant Impact. During operation, no major sources of groundborne vibration are anticipated. Construction activities that might expose persons to excessive ground-borne vibration or ground-borne noise could cause a potentially significant impact. Ground-borne vibration information related to construction activities (including demolition) has been collected by Caltrans (Caltrans 2013). Information from Caltrans indicates that continuous vibrations with a peak particle velocity of approximately 0.1 inches per second begin to annoy people. The heavier pieces of construction equipment, such as bulldozers, would have peak particle velocities of approximately 0.089 inches per second or less at a distance of 25 feet (DOT 2018). Ground-borne vibration is typically attenuated over short distances. At the distance from the

7 No noise-sensitive land uses exist to the north of the project site; thus, the easterly project boundary is the critical location.

8 Because noise levels are summed in the energy (that is, the logarithmic) domain, a noise level that is 10 decibels or more lower than another noise level becomes negligible, because the sound energy from the higher noise source is completely dominant.

nearest vibration-sensitive receivers (residences located to the east and two churches to the south) to where construction activity would be occurring on the project site (approximately 110 feet), and with the anticipated construction equipment, the peak particle velocity vibration level would be approximately 0.0096 inches per second. At the closest sensitive receptors, vibration levels would be well below the vibration threshold of potential annoyance of 0.1 inches/second. Thus, impacts associated with vibration-generated annoyance would be less than significant.

The major concern with regards to construction vibration is related to building damage, which typically occurs at vibration levels of 0.5 inches per second or greater for buildings of reinforced-concrete, steel, or timber construction. As discussed above, the highest anticipated vibration levels associated with on-site project construction would be approximately 0.0096 inches per second, which are well below the threshold of 0.5 inches per second for building damage. Therefore, impacts associated with vibration-produced damage 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?

No Impact. The project site is not located within the vicinity of a private airstrip. In addition, the closest public airport to the project site is the Compton/Woodley Airport, which is located approximately 3.6 miles northeast of the project site in the City of Compton. According to the Los Angeles County Airport Land Use Commission, the project is not located within the airport land use plan for this or other nearby airports. In addition, the Noise Contour Map provides the 65 community noise equivalent level contours of the nearby airports, which are located more than 3 miles from the project site (ALUC 2020). Therefore, no impacts associated with airport and aircraft noise would occur.

3.14 Population and Housing

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XIV. POPULATION AND HOUSING – Would the 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)?	☐	☐	☒	☐
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

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

Less-Than-Significant Impact. The project would require a temporary construction workforce and a permanent operational workforce, both of which could potentially induce population growth in the project area. The temporary workforce would be needed to construct the proposed warehouse building and associated improvements. The number of construction workers needed during any given period would largely depend on the specific stage of construction, but would likely average a few dozen workers at any given time throughout the workday. These short-term positions are anticipated to be filled primarily by workers who reside in the project vicinity.

Similar to the construction jobs created by the project, the project's permanent employment requirements would likely be met through the local existing labor force without people needing to relocate into the project region. Further, the project does not include the construction of residential uses or other land uses typically associated with directly inducing population growth. Overall, the project would not stimulate population growth or population concentration above what is assumed in local and regional land use plans. Therefore, impacts associated with direct or indirect growth would be less than significant.

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

No Impact. The project site is located on a vacant parcel. No residential uses occur on the project site, and as such, the project would not remove people or housing from the site. Therefore, no impact associated with the displacement of existing people or housing would occur.

3.15 Public Services

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

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

Fire protection?

Less-Than-Significant Impact. The Los Angeles County Fire Department (LACoFD) provides fire protection services to the City. There are six primary fire stations that provide fire and emergency medical services to the City. Four of the stations are located within the City's boundaries. The nearest fire station is the LACoFD Station No. 36 (127 W 223rd Street), located approximately 1.3 miles south of the project site.

Based on the proximity of the project site to the existing LACoFD facilities, and since the project site is located in a developed part of the City that is already within the service area of LACoFD, it is anticipated that the project could be served by LACoFD without adversely affecting personnel-to-resident ratios, response times, or other performance objectives. Therefore, impacts associated with LACoFD facilities would be less than significant.

Police protection?

Less-Than-Significant Impact. The Los Angeles County Sheriff's Department contracts with the City to provide police protection services. Los Angeles County Sheriff's Department staff has indicated that an officer-to-population ratio of 1 officer to every 1,000 residents is the desired level of service (County of Los Angeles 2014). According to the City's General Plan, there are approximately 2.1 sworn personnel per 1,000 residents (City of Carson 2004). The Carson Sheriff's Station is located at 21356 South Avalon Boulevard, approximately 1.2 miles southeast of the project site.

Based on the proximity of the project site to the existing Carson Sheriff's Station, and because the project site is located in a developed part of the City that is within the service area of the Carson Sheriff's Station, it is anticipated that the project could be served without adversely affecting personnel-to-resident ratios, response times, or other performance objectives. Therefore, no impacts associated with Los Angeles County Sheriff's Department would occur.

Schools, Parks, and other public facilities?

No Impact. The project would not result in either direct or indirect population growth, and as such, would not increase demands on schools, park and recreation facilities, libraries, community centers, hospitals, or any other public facility. Therefore, no impact associated with schools, parks, or other public facilities would occur.

3.16 Recreation

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

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

No Impact. The project would not result in population growth, and as such, would not increase demands on park and recreation facilities. Therefore, no impact associated with recreational facilities would occur.

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

No Impact. The project is industrial in nature and does not include recreational facilities. In addition, the project would not result in either direct or indirect population growth, and as such, would not increase patronage of park and recreation facilities. Therefore, no impact associated with recreational facilities would occur.

3.17 Transportation

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

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☒	☐	☐
d) Result in inadequate emergency access?	☐	☐	☐	☒

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

Less-Than-Significant Impact. A Vehicle Miles Traveled Memorandum (Appendix F) was prepared for the project. The VMT Analysis is referenced as Appendix F in this MND. This analysis was conducted to qualitatively determine if the project would have a significant transportation impact under recently adopted CEQA guidelines for which compliance with SB 743, requiring VMT analysis, will be required beginning July 1, 2020. This VMT/SB 743 consistency analysis has been prepared consistent with the Office of Planning and Research's (OPR) guidance and methodologies currently available to estimate VMT, and for determining significance of transportation impacts under CEQA.

OPR has approved the addition of new Section 15064.3, "Determining the Significance of Transportation Impacts" to the State's CEQA Guidelines, compliance with which will be required beginning July 1, 2020. The Updated CEQA Guidelines state that "generally, vehicle miles traveled (VMT) is the most appropriate measure of transportation impacts" and define VMT as "the amount and distance of automobile travel attributable to a project." It should be noted that "automobile" refers to on-road passenger vehicles, specifically cars and light trucks. Heavy-duty truck VMT could be included for modeling convenience and ease of calculation (for example, where models or data provide combined auto and heavy truck VMT). Other relevant considerations may include the effects of the project on transit and non-motorized travel.

Section 15064.3 (b)(1) *Criteria for Analyzing Transportation Impacts* includes presumptions that certain projects (including residential, retail, office, and mixed-use projects) proposed within one-half mile of an existing major transit stop or along a high-quality transit corridor will have a less-than-significant impact on VMT. If the specified presumption does not apply, VMT should be analyzed through a qualitative or quantitative analysis. The Updated CEQA Guidelines are accompanied by the Technical Advisory, which includes specifications for how to estimate and forecast VMT. For most projects with multiple land uses, such as residential, commercial, etc., OPR's Technical Advisory suggests that automobile VMT associated with each land use should be quantified. In some cases only the dominant use can be considered. Further, if evaluating each land use separately the automobile VMT from specific trip purposes or travel tours should be isolated.

Additionally, Section 15064.3 (b)(3) *Qualitative Analysis* mentions if existing models or methods are not available to estimate the VMT for the particular project being considered, a lead agency may analyze the project's vehicle miles qualitatively. Such qualitative analysis would evaluate factors such as the

availability of transit, proximity to other destinations, etc. The following method, Assessing Change in Total VMT, from the Technical Advisory will be the primary method of this VMT analysis:

> Assessing Change in Total VMT
>
> A third method, estimating the change in total VMT with and without the project, can evaluate whether a project is likely to divert existing trips, and what the effect of those diversions will be on total VMT. This method answers the question, "What is the net effect of the project on area VMT?" As an illustration, assessing the total change in VMT for a grocery store built in a food desert that diverts trips from more distant stores could reveal a net VMT reduction. The analysis should address the full area over which the project affects travel behavior, even if the effect on travel behavior crosses political boundaries.

OPR recommends using more location-specific information and local jurisdictions to develop their own more specific thresholds, which may include other land use types. In developing thresholds for other project types, or thresholds different from those recommended here, lead agencies should consider the purposes described in Section 21099 of the Public Resources Code and regulations in the CEQA Guidelines on the development of thresholds of significance (e.g., CEQA Guidelines Section 15064.7). Strategies and projects that decrease local VMT but increase total VMT should be avoided. Agencies should also consider whether their actions encourage development in a less travel-efficient location by limiting development in travel-efficient locations.

The updated CEQA Guidelines themselves do not establish a significance threshold; the OPR's Technical Advisory recommends a threshold of significance for residential, office, and other land uses. While the recommended threshold for per-capita or per-employee for residential or office projects, respectively, is 15% below that of existing development, lead agencies can use more location-specific information to develop their own specific threshold for other project/land use types.

Based on the qualitative VMT analysis conducted for the project, the following conclusions regarding traffic and circulation were made:

- The project would operate a cargo container parking facility for transferring goods, or breaking down and assembling tractor-trailer transportation, for goods destined to/from the local Ports of Los Angeles and Long Beach. The project is an intermediary land use between the Ports and the next/final destination (warehouses) of the products shipped through the trucks-trailers utilizing the project.
- The location of the project is strategic for a cargo container parking facility as it is located close to freeway on- and off-ramps located across Figueroa Street, and a frontage road to I-110, which provides direct access to the Ports, and also connects the site to other regionally significant freeways such as I-405, I-710, and SR-91. The location of the project site reduces the need for trucks to travel along other roadways from other truck facilities that may be further away from regional freeways. This diversion from other truck facilities would reduce the VMT generated by those trucks.
- The project would implement the Project Design Features to promote the use of alternative transportation such as transit, ride-sharing, bicycling, and walking to further reduce project trips and/or VMT.

Therefore, based on the project's proximity to I-110, which provides direct access to other regional significant freeway facilities; the project's potential to divert truck traffic from other truck facilities located further away from regional freeway facilities; and, the requirement to implement VMT-reducing Project Design Features, impacts associated with the circulation system and VMT/SB 743, impacts would be less than significant.

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

Less-Than-Significant Impact. Refer to response provided in Impact 3.17(a).

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)?

Less-Than-Significant Impact with Mitigation Incorporated. As currently proposed by the project applicant, the two project driveways located along Figueroa Street will serve only truck traffic for the project. All truck traffic exiting the site would use the southern driveway (Project Driveway 2), and all truck traffic entering the site would use the northern driveway (Project Driveway 1).

However, an initial Caltrans review noted that based on an overlay of a design vehicle truck path, inbound trucks from the northbound I-110 off-ramp may cross into other lanes on Figueroa Street in order to turn into the project's inbound truck driveway (Project Driveway 1), creating an unsafe condition. For the project's outbound truck driveway (Project Driveway 2), exiting project trucks may be competing with other northbound trucks on Figueroa Street to enter the left turn lane to the I-110 on-ramp, which may cause safety and operational issues at the Figueroa Street/I-110 northbound ramps intersection. As a result, Caltrans recommended that the driveways and intersection be redesigned pursuant to their design recommendations to ensure that truck egress and ingress does not conflict with traffic operations at the Figueroa Street/I-110 northbound ramps intersection. This recommendation is outlined below in **MM-TRA-1**.

MM-TRA-1 Prior to the issuance of the first building permit, the project applicant shall coordinate with the California Department of Transportation (Caltrans) and the City on the redesign of the Figueroa Street/Interstate (I-) 110 northbound ramps intersection to ensure adequate and safe operation at the intersection and project access. The intersection modification shall involve the consolidation of the two project driveways currently proposed along Figueroa Street into a single driveway that is aligned with the present location of the I-110 on- and off ramps (i.e., creation of new east leg of the intersection) or other designs acceptable to Caltrans. The required improvement shall be installed and operational to the satisfaction of Caltrans and the City prior to issuance of the first Certificate of Occupancy.

With incorporation of mitigation, impacts associated with hazardous roadway design features would be less than significant.

d) Would the project result in inadequate emergency access?

No Impact. Exhibit SAF-5 in the City's General Plan Safety Element shows the location of collection points and evacuation routes for the City (City of Carson 2004). Emergency access routes in the project vicinity include Maine Street, Figueroa Street, and Del Amo Boulevard. Site access will be provided via one 30-foot wide driveway located along Main Street and two driveways located along Figueroa Street. Emergency vehicle access will be available at all driveways and facilitated within the entirety of the project site. The project site would be accessible to emergency responders during construction and operation of the project. Therefore, no impacts associated with an emergency response plan or emergency evacuation plan would occur.

3.18 Tribal Cultural Resources

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

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

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

Less-Than-Significant Impact. On January 22, 2020, a records search was conducted of the California Historical Resources Information System at the SCCIC, located on the campus of

California State University, Fullerton, of the study area and a 0.5-mile (804 feet) record search area. This search included their collections of mapped prehistoric, historic, and built environment resources; Department of Parks and Recreation Site Records; technical reports; and ethnographic references. Additional consulted sources included historical maps of the study area, the NRHP, the CRHR, the California Historic Property Data File, the lists of California State Historical Landmarks, California Points of Historical Interest, and the Archaeological Determinations of Eligibility.

The SCCIC records indicate that 15 cultural resources investigations have been conducted within 0.5 miles of the project site. Of these 15 studies, 2 overlap the project site (LA-03583 and LA-6194) and 1 study (LA-00229) is adjacent to the project site. These reports discussed historical and prehistoric resources located within the broader project area and the City. However, in terms of the project site, no resources were identified in these previous studies either within or near the project site. While two previously recorded cultural resources fall within a 0.5-mile radius of the project site, both of these resources are identified as prehistoric habitation debris located outside of the project site.

In addition, a historical resource is defined by PRC Section 21084.1 and CEQA Guidelines Section 15064.5 as any resource listed or determined to be eligible for listing in the NRHP as well as some California State Landmarks and Points of Historical Interest. In addition, historical resources are evaluated against the CRHR criteria prior to making a finding as to the project's impacts on historical resources. Generally, resources must be at least 50 years old to be considered for listing in the CRHR as a historical resource. A significant adverse effect would occur if a project were to adversely affect a historical resource as defined by PRC Section 21084.1 and Section 15064.5 of the CEQA Guidelines.

The project site is currently a vacant parcel with no existing structures on site. As such, the project site does not contain any built-environment resources that could be eligible for listing in the NRHP or CRHR, and thus, would not be considered a historical resource as defined by CEQA. Therefore, impacts associated with historical resources would be less than significant.

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

Less-Than-Significant Impact with Mitigation Incorporated. The project is subject to compliance with AB 52 (PRC Section 21074). AB 52 requires consideration of impacts to tribal cultural resources as part of the CEQA process and requires the City, as the lead agency, to notify any groups that are traditionally or culturally affiliated with the geographic area of the project and who have requested notification.

As a part of the government-to-government consultation efforts prescribed under AB 52, the City notified Native American representatives, inviting the tribes to consult on the project. On February 10, 2020, the City sent notification letters to representatives with the Gabrieleno Band of Mission Indians – Kizh Nation, Gabrieleno/Tongva San Gabriel Band of Mission Indians, Gabrielino/Tongva Nation, Gabrielino Tongva Indians California Tribal Council, and Gabrielino-

Tongva Tribe. The City received one response from the Gabrieleno Band of Mission Indians – Kizh Nation, and formal consultation was held between this tribe and the City on March 4, 2020. As a result of this consultation, the tribe concluded that the project has low potential to impact tribal cultural resources, and no further concerns about the project. Thus, the tribal consultation process under AB 52 is considered to be completed.

Previous on-site development activities associated with the former landfill use affected the entirety of the project site, and as such, it follows that any resources that may have once been located on the project site would have been significantly disturbed. In addition, grading, excavation, and other earthmoving construction activities would be greatly limited due to the presence of subsurface contamination. Nonetheless, it is always possible that intact archaeological deposits, including tribal cultural resources, are present at subsurface depths that were not earlier impacted by the current on-site development. For this reason, the project site should be treated as potentially sensitive for archaeological resources, including tribal cultural resources. **MM-CUL-1** is recommended to reduce potential impacts to unanticipated tribal cultural resources to less than significant.

3.19 Utilities and Service Systems

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

a) 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, the construction or relocation of which could cause significant environmental effects?

Less-Than-Significant Impact. The immediate project area is currently served by domestic water, municipal sewer, stormwater, and other wet and dry utilities. Given that the project would introduce industrial development onto a currently vacant site, the project would increase demand for water, wastewater treatment, stormwater drainage, electric power, and telecommunications facilities compared with the existing undeveloped condition of the parcel. However, because the project area is currently served by existing wet and dry utilities, and due to the fact that majority of the project is dedicated to truck parking, which has no or very low demand for domestic water, municipal sewer, stormwater, and other wet and dry utilities, the project is not expected to result in upsizing, replacement, or relocation of any existing utilities and associated infrastructure in the project area. Therefore, impacts associated with the relocation of existing or construction of new utilities would be less than significant.

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

Less-Than-Significant Impact. The project site would receive its water supply from the Rancho Dominguez District of Cal Water. Based on the 2015 UWMP, the Rancho Dominguez District receives its water from 17% groundwater, 15% recycled water, and 68% purchased water. Purchased water is delivered from four Metropolitan Water District distribution feeders (Cal Water 2016).

Since the main source of water for the site is purchased water, supply availability is dependent on precipitation. However, customer demands do vary with local rainfall. In general, water demand tends to increase in dry years, primarily due to increased water activities such as landscape irrigation. Thus, to assess the reliability of their water supply service, every urban water supplier is required to assess its water service under normal, dry, and multiple-dry water years. Table 14 provides water demand and supplies for dry- and multiple-dry-year scenarios for the Rancho Dominguez District of Cal Water.

Table 14. Multiple Dry Years Supply and Demand Comparison (Acre-Feet per Year)

Dry Year Scenario	Supply and Demand	2020	2025	2030	2035	2040
First Year	Supply Totals	43,623	44,376	45,395	46,554	47,858
	Demand Totals	43,623	44,376	45,395	46,554	47,858
	Difference	*0*	*0*	*0*	*0*	*0*
Second Year	Supply Totals	43,210	43,964	44,981	46,138	47,440
	Demand Totals	43,210	43,964	44,981	46,138	47,440
	Difference	0	0	0	0	0
Third Year	Supply Totals	43,412	44,165	45,183	46,341	47,664
	Demand Totals	43,412	44,165	45,183	46,341	47,664
	Difference	*0*	*0*	*0*	*0*	*0*

Source: Cal Water 2016, Table 7-4.

According to the 2015 UWMP, Cal Water coordinates on an ongoing basis with all relevant agencies in the region to optimize the use of regional water supplies. This includes the West Basin Municipal Water District, Los Angeles County Sanitation Districts, the Water Replenishment District of Southern California, and other public and private entities. In addition, Cal Water has its own conservation programs to reduce demand on water sources. The UWMP also describes the water shortage contingency plan for the Rancho Dominguez District in the event of a drought or a catastrophic supply interruption. The details of the Water Shortage Contingency Plan are provided in the 2015 UWMP and include restrictions on water use based on the four stages of action. With the projects and programs implemented by Cal Water and the City, water supplies are projected to meet full-service demands (see Table 14) (Cal Water 2016).

Because the City's water demands can be met under multiple dry years, and because supply would meet projected demand due to diversified supply and conservation measures, the project's water demands would be served by the City's projected current and future supplies. Therefore, the project would have sufficient water supplies available during normal, dry, and multiple dry years. Impacts 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?

Less-Than-Significant Impact. Because the project area is currently served by existing municipal sewer facilities, and due to the fact that majority of the project is dedicated to truck parking, which has no or very low demand for municipal sewer, the project can be served by the wastewater treatment provider (Sanitation Districts of Los Angeles County). Wastewater generated at the project site would be treated at the Joint Water Pollution Control Plant (JWPCP), which is owned and operated by Sanitation Districts of Los Angeles County. The JWPCP is one of the largest wastewater treatment plants in the world and is the largest of the Sanitation Districts of Los Angeles County's wastewater treatment plants. JWPCP provides primary and secondary treatment for an estimated 260 million gallons per day of wastewater. The facility is permitted a total capacity of 400 million gallons per day (LACSD 2019). Wastewater generated by the project would represent only a nominal percentage of the JWPCP average dry-weather flow capacity and average wastewater flow. Therefore, impacts associated with 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?

Less-Than-Significant Impact. According to the City General Plan, solid waste generated by industrial, commercial, and residential uses in the City is collected by Waste Management. Waste Management collects an estimated 153,500 tons from commercial and industrial customers per year. Solid waste collected by Waste Management is transported to the Carson Transfer Station and Materials Recovery where it is sorted by material type. The 10-acre facility has a permitted capacity of 5,300 tons per day. Once the materials have been sorted, tires, green waste, steel, and wood are diverted to special facilities for disposal and recycling. Excess solid waste is sent to El Sobrante Landfill in Riverside County, approximately 75 miles from the City. Waste Management also disposes solid waste to Lancaster Landfill and Simi Valley Landfill as alternates. The total permitted throughput for all landfills is 30,404 tons per day, and approximately 249 million cubic yards of capacity remain (CalRecycle 2019).

All collection, transportation, and disposal of any solid waste generated by the project during construction and operation would comply with all applicable federal, state, and local statutes and regulations. In particular, AB 939 requires that at least 50% of solid waste generated by a jurisdiction be diverted from landfill disposal through source reduction, recycling, or composting. Cities, counties, and regional agencies are required to develop a waste management plan that would achieve a 50% diversion from landfills (PRC Section 40000 et seq.). Furthermore, as required by existing regulations, any hazardous materials collected on the project site during demolition, construction, or operational activities would be transported and disposed of by a permitted and licensed hazardous materials service provider at a facility permitted to accept such hazardous materials. Therefore, impacts associated with the generation of solid waste 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?***

Less-Than-Significant Impact. All collection, transportation, and disposal of solid waste generated by the project would comply with all applicable federal, state, and local statutes and regulations. Under AB 939, the Integrated Waste Management Act of 1989, local jurisdictions are required to develop source reduction, reuse, recycling, and composting programs to reduce the amount of solid waste entering landfills. Local jurisdictions are mandated to divert at least 50% of their solid waste generation into recycling. The project would be required to submit plans to the City of Carson Public Works Department for review and approval to ensure the plan would comply with AB 939.

In addition, the state has set an ambitious goal of 75% recycling, composting, and source reduction of solid waste by 2020. To help reach this goal, the state has adopted AB 341 and AB 1826. AB 341 is a mandatory commercial recycling bill and AB 1826 is a mandatory organic recycling bill. Waste generated by the project would enter the City's waste stream but would not adversely affect the City's ability to meet the requirements of AB 939, AB 341, or AB 1826, since the project's waste generation would represent a nominal percentage of the waste created within the City. Therefore, impacts associated with solid waste disposal regulations would be less than significant.

3.20 Wildfire

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XX. WILDFIRE – If located in or near state 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?	☐	☐	☐	☒
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?	☐	☐	☐	☒

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☐	☒
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	☒

CAL FIRE is responsible for designating fire hazard severity zones (FHSZs) within the State Responsibility Area throughout California. FHSZs are geographical areas with an elevated risk for wildfire hazard. The State Responsibility Area is the area for which the state assumes financial responsibility for fire suppression and protection. CAL FIRE also creates recommended maps for very high FHSZs within the Local Responsibility Area, which are then adopted, or modified and adopted, by local jurisdictions. Development within a State Responsibility Area is required to abide by specific development and design standards. A review of CAL FIRE's FHSZ maps and data revealed that the project site is not located within a State Responsibility Area or a very high FHSZ (CAL FIRE 2020). In addition, the LACoFD Fire Zone Map indicates that the project site is not located within an FHSZ as designated by the City (LAFD 20198). Nonetheless, a response has been provided for the following threshold questions.

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

No Impact. The project site is located in a highly developed part of the City and is surrounded by an urbanized mix of land uses. The project area lacks any lands considered wildlands or wildland–urban interfaces. According to CAL FIRE's FHSZ maps, the project site is neither moderately, highly, nor very highly susceptible to wildland fire (CAL FIRE 2020). Therefore, no impacts associated with wildland fires would occur.

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

No Impact. Refer to response provided in Impact 3.20(a).

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?

No Impact. Refer to response provided in Impact 3.20(a).

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

No Impact. Refer to response provided in Impact 3.20(a).

3.21 Mandatory Findings of Significance

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

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

Less-Than-Significant Impact with Mitigation Incorporated. As previously discussed in Section 3.4, Biological Resources, the project would not result in significant impacts to biological resources. In addition, as described in Section 3.5, Cultural Resources, Section 3.7, Geology and Soils, and Section 3.18, Tribal Cultural Resources, the project would not result in significant impacts to archaeological resources, paleontological resources, and tribal cultural resources with mitigation incorporated.

Previous on-site development activities associated with the former landfill use affected the entirety of the project site, and as such, it follows that any resources that may have once been located on the project site would have been significantly disturbed. In addition, grading, excavation, and other earthmoving construction activities would be greatly limited due to the presence of subsurface contamination. Nonetheless, it is always possible that intact archaeological and fossil deposits are present at subsurface depths that were not earlier impacted by the current on-site development. For this reason, the project site should be treated as potentially sensitive for archaeological and paleontological resources. **MM-CUL-1** and **MM-GEO-1** are recommended to reduce potential impacts to unanticipated archaeological and paleontological resources to less than significant.

Therefore, with the incorporation of mitigation, the project would not degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory.

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

Less-Than-Significant Impact with Mitigation Incorporated. As concluded throughout this IS/MND, the project would result in either no impact, less-than-significant impact, or less-than-significant impact with incorporation of mitigation with respect to all environmental impact areas outlined in the CEQA Guidelines Appendix G Environmental Checklist. Cumulative impacts of several resource areas have already been addressed in several resource sections: Section 3.3, Air Quality; Section 3.8, Greenhouse Gas Emissions; and Section 3.13, Noise. CalEEMod was used to assess the air quality and GHG emissions impacts resulting from the project, concluding less-than-significant impacts with mitigation. The noise analysis conducted as part of this IS/MND concluded that cumulative impacts would be less than significant with incorporation of mitigation.

Some of the other resource areas (i.e., Section 3.1, Aesthetics; Section 3.2, Agricultural and Forestry Resources; Section 3.10, Hydrology and Water Quality; Section 3.11, Land Use and Planning; Section 3.12, Mineral Resources; Section 3.14, Population and Housing; Section 3.15, Public Services; Section 3.16, Recreation; Section 3.17, Transportation; and Section 3.19, Utilities and Services Systems) were determined to have a less-than-significant impact or no impact compared to existing conditions, and, thus, the project would not contribute to cumulative impacts related to these environmental topics. Other issues areas (i.e., Section 3.5, Cultural Resources; Section 3.7, Geology and Soils; Section 3.9, Hazards and Hazardous Materials; and Section 3.18, Tribal Cultural Resources) are by their nature site-specific, and impacts at one location do not add to impacts at other locations or create additive impacts.

For all resource areas analyzed, the project's individual-level impacts would be at less-than-significant levels, which, in turn, would reduce the potential for these impacts to be considered part of any cumulative impact. Therefore, the project would not result in individually limited but cumulatively considerable impacts.

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

Less-Than-Significant Impact with Mitigation Incorporated. As evaluated throughout this document, the project would have no impact, less-than-significant impact, or less-than-significant impact with mitigation incorporated with respect to all environmental impact areas. Therefore, the project would not directly or indirectly cause substantial adverse effects on human beings.

4 References and Preparers

4.1 References Cited

14 CCR 15000–15387 and Appendices A through L. Guidelines for Implementation of the California Environmental Quality Act, as amended.

ALUC (Airport Land Use Commission). 2020. "GIS Interactive Map (A-Net)." Accessed January 2020. http://planning.lacounty.gov/assets/obj/anet/Main.html.

Baltrënas, P., D, Kazlauskas, and E. Petraitis. 2004. "Testing on Noise Levels Prevailing at Motor Vehicle Parking Lots and Numeral Simulation of its Dispersion." *Journal of Environmental Engineering and Landscape Management* 12:2, 63-70.

CAL FIRE (California Department of Forestry and Fire Services). 2020. "Fire Hazard Severity Zone Viewer." Accessed January 23, 2020. http://egis.fire.ca.gov/FHSZ/.

Cal Water (California Water Service). 2016. *2015 Urban Water Management Plan, Dominguez District*. June 2016. https://www.calwater.com/docs/uwmp2015/rd/Dominguez/2015_Urban_Water_Management_Plan_Final_(DOM).pdf.

California Public Resources Code, Section 21000–21177. California Environmental Quality Act, as amended.

CalRecycle (California Department of Resources Recycling and Recovery). 2019. "Facility/Site Summary Details: Mid-Valley Sanitary Landfill." Accessed April 2020. https://www2.calrecycle.ca.gov/SWFacilities/Directory/.

Caltrans (California Department of Transportation). 2013. *Transportation and Construction Vibration Guidance Manua*l. Division of Environmental Analysis, Environmental Engineering, Hazardous Waste, Air, Noise, Paleontology Office. September 2013.

Caltrans. 2020. *California Scenic Highway Mapping System: Los Angeles County*.

CARB. 2014. *First Update to the Climate Change Scoping Plan: Building on the Framework*. May 2014.

CARB. 2017. *California's 2017 Climate Change Scoping Plan*. November 2017. Accessed September 2019. https://www.arb.ca.gov/cc/scopingplan/scoping_plan_2017.pdf.

CARB. 2018. "Area Designation Maps/State and National." Last reviewed December 28, 2018. Accessed September 2019. http://www.arb.ca.gov/desig/adm/adm.htm.

CARB. 2019. "Common Air Pollutants." https://ww2.arb.ca.gov/resources/common-air-pollutants.

City of Carson. 2002. *City of Carson General Plan Environmental Impact Report*. SCH no. 2001091120. Prepared by RBF Consulting. October 30, 2002. http://ci.carson.ca.us/content/files/pdfs/planning/generalplan/EIR.pdf.

City of Carson. 2004. *City of Carson General Plan*. Adopted October 11, 2004. http://ci.carson.ca.us/content/files/pdfs/planning/CityofCarsonGeneralPlan.pdf.

City of Carson. 2015. "General Plan – Land Use Map." Accessed February 6, 2020. http://ci.carson.ca.us/content/files/pdfs/GIS/mapgallery/GeneralPlan24x36.pdf.

City of Carson. 2017. "General Plan – Zoning Map." Accessed February 6, 2020. http://gis.carson.ca.us/pdfs/mapgallery/Zoning_11x17.pdf.

City of Carson. 2019. "Truck Route and Parking Map." Accessed February 2020. https://ci.carson.ca.us/content/files/pdfs/ENGINEERING/traffic_engineering/TruckRoutesAndParking_11x17_2019.pdf.

County of Los Angeles. 2020a. Los Angeles County Department of Regional Planning, GIS-NET3 Significant Ecological Areas. Accessed January 2020. http://rpgis.isd.lacounty.gov/GIS-NET3_Public/Viewer.html.

County of Los Angeles. 2020b. "L.A. County's Airport Land Use Commission Site." Accessed February 6, 2020. http://lacounty.maps.arcgis.com/apps/webappviewer/index.html?id=acf2e87194a54af9b266bf07547f240a.

Courier Corporation. 2019. "Product Data, WeatherMaker A Packaged Rooftop Units, 20 to 60 Nominal Tons." Accessed October 2, 2019. https://www.utcccs-cdn.com/hvac/docs/1005/Public/09/48_50A-19PD.pdf

DOC (California Department of Conservation). 2016a. "California Important Farmland Finder." Accessed January 23, 2020. https://maps.conservation.ca.gov/DLRP/CIFF/.

DOC. 2016b. "Los Angeles County Williamson ACT FY 2015/2016." Accessed January 23, 2020. ftp://ftp.consrv.ca.gov/pub/dlrp/wa/LA_15_16_WA.pdf.

EPA (U.S. Environmental Protection Agency). 2018. "Region 9: Air Quality Analysis, Air Quality Maps." Last updated September 28, 2018. Accessed September 2019. http://www.epa.gov/region9/air/maps/.

EPA. 2020. "Defining Hazardous Waste: Listed, Characteristic and Mixed Radiological Wastes." Updated February 4, 2020. https://www.epa.gov/hw/defining-hazardous-waste-listed-characteristic-and-mixed-radiological-wastes.

FEMA (Federal Emergency Management Agency). 2008. "FEMA Flood Map Service Center." Accessed February 07, 2020. https://msc.fema.gov/portal/search?AddressQuery=sun%20valley%20#searchresultsanchor.

FHWA (Federal Highway Administration). 2004. "FHWA Traffic Noise Model, Version 2.5." Office of Environment and Planning. Washington, DC. February.

FHWA. 2008. "Roadway Construction Noise Model (RCNM)."

LAFD (Los Angeles Fire Department). 2019. "Los Angeles Fire Department Fire Zone Map." Accessed February 3, 2020. https://www.lafd.org/fire-prevention/brush/fire-zone/fire-zone-map.

OSHA (Occupational Safety and Health Administration). "Hazard Communication Standard: Safety Data Sheets." Accessed March 2020. https://www.osha.gov/Publications/OSHA3514.html.

SCAQMD (South Coast Air Quality Management District).1993. *SCAQMD CEQA Air Quality Handbook*.

SCAQMD. 2003. *2003 Air Quality Management Plan*. August 1, 2003. https://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan/2003-aqmp.

SCAQMD. 2008. *Final Localized Significance Threshold Methodology*. July 2008. http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/final-lst-methodology-document.pdf.

SCAQMD. 2005. "Rule 403, Fugitive Dust." Amended June 3, 2005. Accessed February 2020. http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403.pdf?sfvrsn=4.

SCAQMD. 2019. "SCAQMD Air Quality Significance Thresholds." Originally published in CEQA Air Quality Handbook, Table A9-11-A. Revised April 2019. http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf?sfvrsn=2.

U.S. Census Bureau. 2019. Census Tracts. Accessed February 2020. https://www.census.gov/geographies/reference-maps/2010/geo/2010-census-tract-maps.html.

USDA (U.S. Department of Agriculture). 2020. Web Soil Survey, USDA, Natural Resources Conservation Service, Soil Survey Staff. http://websoilsurvey.nrcs.usda.gov.

USFWS (U.S. Fish and Wildlife Service). 2020. "National Wetlands Finder." Accessed February 6, 2020. https://www.fws.gov/wetlands/Data/Mapper.html.

4.2 List of Preparers

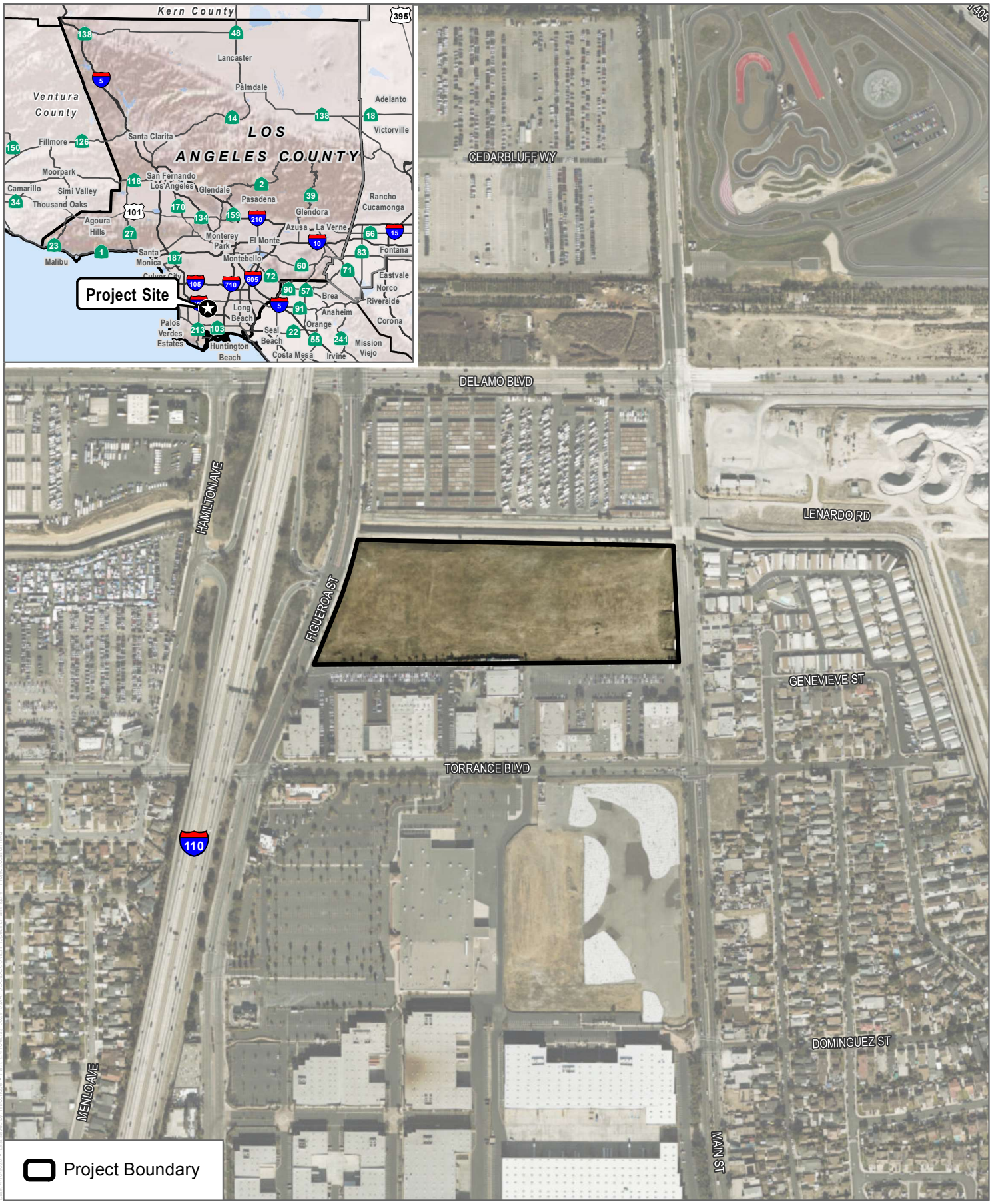
City of Carson

Manraj Bhatia, Assistant Planner

Dudek

Collin Ramsey, Project Manager
Lillian Martin, Environmental Analyst
Jennifer Reed, Air Quality Specialist
David Larocca, Air Quality Specialist
Linda Kry, Cultural Specialist
Mike Greene, Noise Specialist
Dennis Pascua, Traffic
Amanda Meroux, Traffic
Brayden Dokkestul, GIS Technician
Amy Seals, Senior Technical Editor
Hannah Wertheimer, Technical Editor

INTENTIONALLY LEFT BLANK



SOURCE: ESRI 2018, County of Los Angeles 2011

DUDEK

0 250 500 Feet
0 75 150 Meters
1:6,000

FIGURE 1

Project Location

KL Fenix Cargo Container Parking Specific Plan

INTENTIONALLY LEFT BLANK

SOURCE: ESRI 2018, County of Los Angeles 2011

DUDEK

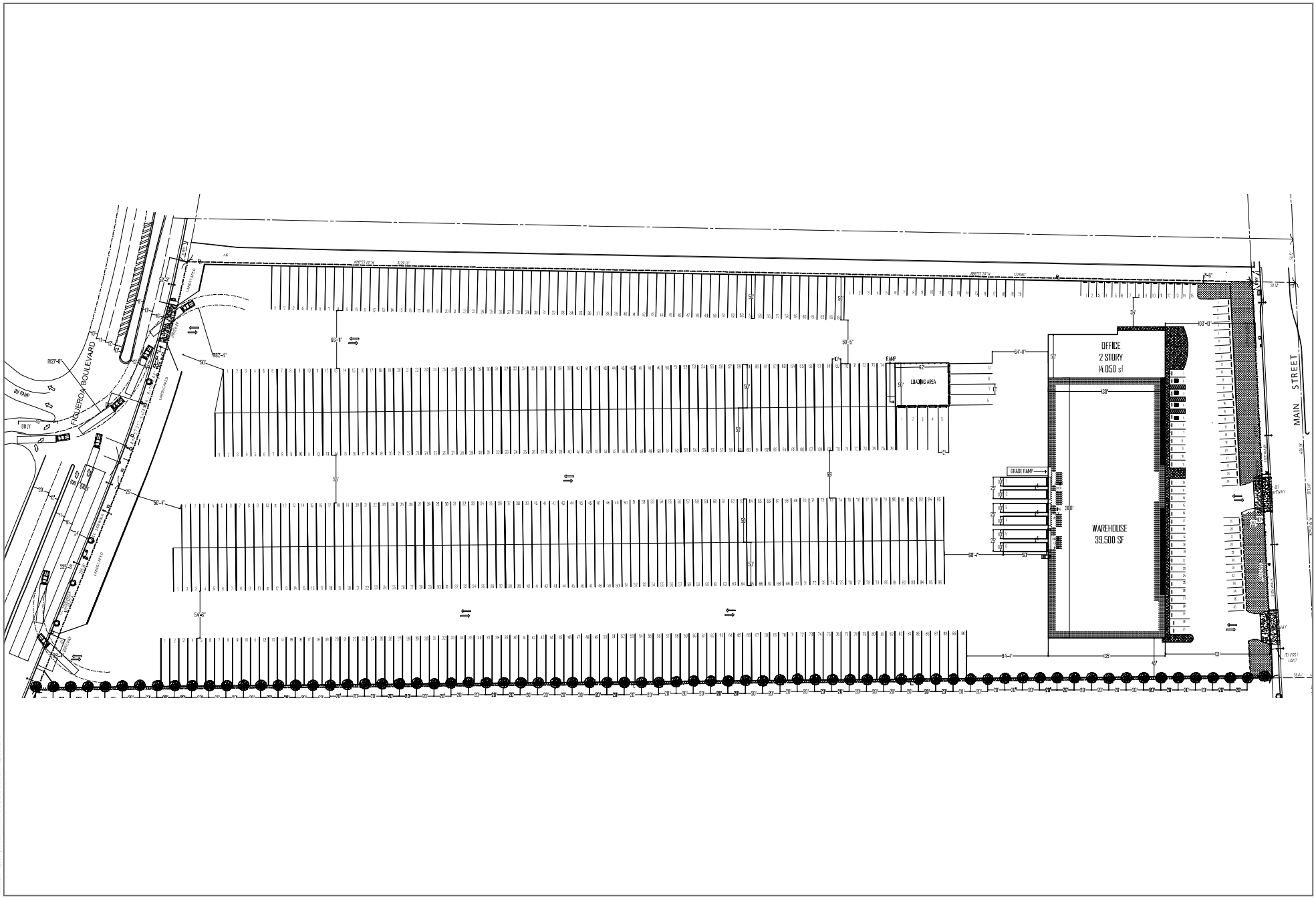
0 250 500 Feet
0 75 150 Meters
1:6,000

FIGURE 2

Surrounding Land Uses

KL Fenix Cargo Container Parking Specific Plan

INTENTIONALLY LEFT BLANK



SOURCE: KL Fenix Corp., 2018

FIGURE 3

Site Plan

KL Fenix Cargo Container Parking Specific Plan

DUDEK

INTENTIONALLY LEFT BLANK

SOURCE: ESRI 2018, County of Los Angeles 2011

DUDEK

0 250 500 Feet
0 75 150 Meters
1:6,000

FIGURE 4

Noise Measurement Locations

KL Fenix Cargo Container Parking Specific Plan

INTENTIONALLY LEFT BLANK

FINAL

Initial Study/Mitigated Negative Declaration, Responses to Comments, and Mitigation Monitoring and Reporting Program KL Fenix Cargo Container Parking Specific Plan

Prepared for:

City of Carson
701 East Carson Street
Carson, California 90745
Contact: Manraj Bhatia, Assistant Planner

Prepared by:

DUDEK
27372 Calle Arroyo
San Juan Capistrano, California 92675
Contact: Collin Ramsey, Senior Project Manager

MAY 2020

Printed on 30% post-consumer recycled material.

Table of Contents

INTENTIONALLY LEFT BLANK

Acronyms and Abbreviations

Acronym/Abbreviation	Definition
CEQA	California Environmental Quality Act
City	City of Carson
IS	Initial Study
MMRP	Mitigation Monitoring and Reporting Program
MND	Mitigated Negative Declaration
project	KL Fenix Cargo Container Parking Specific Plan

INTENTIONALLY LEFT BLANK

1 Introduction

An Initial Study (IS)/Mitigated Negative Declaration (MND) was prepared for the proposed KL Fenix Cargo Container Parking Specific Plan (project) and made available for public comment for a 30-day public review period from April 14, 2020, through May 13, 2020. In accordance with the California Environmental Quality Act (CEQA) Guidelines, Section 15074(b) (14 CCR 15074(b)), before approving the project, the City of Carson (City), as the lead agency under CEQA, will consider the MND with any comments received during this public review period. Specifically, Section 15074(b) of the CEQA Guidelines (14 CCR 15074(b)) states the following:

> Prior to approving a project, the decision-making body of the lead agency shall consider the proposed negative declaration or mitigated negative declaration together with any comments received during the public review process. The decision-making body shall adopt the proposed negative declaration or mitigated negative declaration only if it finds on the basis of the whole record before it (including the initial study and any comments received), that there is no substantial evidence that the project will have a significant effect on the environment and that the negative declaration or mitigated negative declaration reflects the lead agency's independent judgment and analysis.

The agencies and individuals that provided substantive written comments on the environmental issues addressed within the IS/MND during the public review period are listed in Table 1. Although CEQA (California Public Resources Code, Section 21000 et seq.) and the CEQA Guidelines (14 CCR 15000 et seq.) do not explicitly require a lead agency to provide written responses to comments received on a proposed IS/MND, the lead agency may do so voluntarily. Individual comments within each communication are numbered so comments can be cross-referenced with responses.

Table 1. Comment Letter Summary

Letter Number	Commenter	Date
1	Ronald M. Durbin, Chief, Forestry Division Prevention Services Bureau, Los Angeles County Fire Department	May 7, 2020
2	Miya Edmonson, IGR/CEQA Branch Chief, California Department of Transportation, District 7	May 8, 2020
3	Adriana Raza, Customer Service Specialist, Los Angeles County Sanitation District	May 13, 2020

Responses to comments are made in the following text to further supplement, clarify, or expand upon information already presented in the IS/MND. These responses do not change the significance determinations made or the severity of potential environmental impacts evaluated in the IS/MND. Section 15073.5(c)(4) of the CEQA Guidelines (14 CCR 15073.5(c)(4)) permits the inclusion of new information within an MND if the additional information "merely clarifies, amplifies, or makes insignificant modifications to the negative declaration."

INTENTIONALLY LEFT BLANK

2 Response to Comments

Comment Letter 1

COUNTY OF LOS ANGELES
FIRE DEPARTMENT

1320 NORTH EASTERN AVENUE
LOS ANGELES, CALIFORNIA 90063-3294
(323) 881-2428
www.fire.lacounty.gov

"Proud Protectors of Life, Property, and the Environment"

BOARD OF SUPERVISORS

HILDA L. SOLIS
FIRST DISTRICT

MARK RIDLEY-THOMAS
SECOND DISTRICT

SHEILA KUEHL
THIRD DISTRICT

JANICE HAHN
FOURTH DISTRICT

KATHRYN BARGER
FIFTH DISTRICT

DARYL L. OSBY
FIRE CHIEF
FORESTER & FIRE WARDEN

May 7, 2020

Manraj Bhatia, Assistant Planner
City of Carson
Community Development Department
701 East Carson Street
Carson, CA 90745

Dear Mr. Bhatia:

NOTICE OF INTENT TO ADOPT A MITIGATED NEGATIVE DECLARATION, "KL FENIX CARGO CONTAINER PARKING SPECIFIC PLAN PROJECT," INVOLVES THE CONSTRUCTION AND OPERATION OF A CARGO CONTAINER PARKING FACILITY, WHICH WOULD BE USED TO MOBILIZE BOTH IMPORTED AND EXPORTED GOODS THAT PASS THROUGH THE PORTS OF LOS ANGELES AND LONG BEACH, LOCATED AT 20601 SOUTH MAIN STREET, CARSON, FFER 2020002205

The Notice of Intent to Adopt a Mitigated Negative Declaration has been reviewed by the Planning Division, Land Development Unit, Forestry Division, and Health Hazardous Materials Division of the County of Los Angeles Fire Department.

The following are their comments:

PLANNING DIVISION:

We have no comments.

1-1

For any questions regarding this response, please contact Loretta Bagwell, Planning Analyst, at (323) 881-2404 or Loretta.Bagwell@fire.lacounty.gov.

LAND DEVELOPMENT UNIT:

The proposed development was reviewed by the County of Los Angeles Fire Department's Fire Prevention, Land Development Unit under the Conditional Use Permit Submittal No.

1-2

1074-2018 and Site Plan Review No. 1745-2018 on March 8, 2018. The project as submitted at the time of review for the Conditional Use Permit and Site Plan Review satisfied the Fire Department requirements for Fire Department access and water for firefighting purposes.

At this time the County of Los Angeles Fire Department has no additional requirements for the proposed development. Future changes to the proposed development may require additional Fire Department Fire Prevention, Land Development review.

Submittal of the architectural plans shall be submitted to the County of Los Angeles Fire Department's Fire Prevention Engineering Section Building Plan Check Unit, Hawthorne, for review and approval prior to building permit issuance. Contact Fire Prevention Engineering Section Building Plan Check Unit, Hawthorne, for specific submittal instructions at (310) 263-2732.

The development of this project must comply with all applicable code and ordinance requirements for construction, access, water main, fire flows, and fire hydrants.

Should any questions arise regarding subdivision, water systems, or access, please contact the County of Los Angeles Fire Department Land Development Unit's, Inspector Nancy Rodeheffer at (323) 890-4243.

1-2 Cont.

FORESTRY DIVISION – OTHER ENVIRONMENTAL CONCERNS:

The statutory responsibilities of the County of Los Angeles Fire Department's Forestry Division include erosion control, watershed management, rare and endangered species, vegetation, fuel modification for Very High Fire Hazard Severity Zones, archeological and cultural resources, and the County Oak Tree Ordinance. Potential impacts in these areas should be addressed.

Under the Los Angeles County Oak tree Ordinance, a permit is required to cut, destroy, remove, relocate, inflict damage or encroach into the protected zone of any tree of the Oak genus which is 25 inches or more in circumference (eight inches in diameter), as measured 4 1/2 feet above mean natural grade.

If Oak trees are known to exist in the proposed project area further field studies should be conducted to determine the presence of this species on the project site.

The County of Los Angeles Fire Department's Forestry Division has no further comments regarding this project.

For any questions regarding this response, please contact Forestry Assistant, Joseph Brunet at (818) 890-5719.

1-3

Manraj Bhatia, Assistant Planner
May 7, 2020
Page 3

HEALTH HAZARDOUS MATERIALS DIVISION:

The Health Hazardous Materials Division (HHMD) of the Los Angeles County Fire Department advises that a portion of the historic Gardena Valley Landfill occupies the project site. The Cal-EPA Los Angeles Regional Water Quality Control Board should be contacted regarding the status of the landfill in regards to the presence of methane gas and other potential hazardous materials. HHMD has no additional comments for the project at this time.

1-4

Please contact HHMD senior typist-clerk, Perla Garcia at (323) 890-4035 or Perla.garcia@fire.lacounty.gov if you have any questions.

If you have any additional questions, please contact this office at (323) 890-4330.

Very truly yours,

RONALD M. DURBIN, CHIEF, FORESTRY DIVISION
PREVENTION SERVICES BUREAU

RMD:ac

INTENTIONALLY LEFT BLANK

Response to Comment Letter 1

County of Los Angeles Fire Department, Forestry Division, Prevention Services Bureau
Ronald M. Durbin, Acting Chief
May 7, 2020

1-1 The City appreciates the Planning Division's review of the Draft IS/MND.

1-2 The City appreciates the Land Development Unit's review of the Draft IS/MND. The City acknowledges the provisions and requirements set forth by the Land Development Unit of the County of Los Angeles Fire Department and will submit the final architectural plans to the Los Angeles Fire Department's Fire Prevention Engineering Section Building Plan Check Unit for review and approval prior to building permit issuance. Should the City have any questions regarding this information, the City will contact the County of Los Angeles Fire Department staff referenced in this comment.

1-3 The City appreciates the Forestry Division's review of the Draft IS/MND. The Draft IS/MND evaluates impacts regarding erosion control in Section 3.7, Geology and Soils; rare and endangered species, vegetation, and the County's Tree Ordinance in Section 3.4, Biological Resources; Very High Fire Hazard Severity Zones in Section 3.20, Wildfire; and archaeological and cultural resources in Section 3.5, Cultural Resources. In regard to the Los Angeles County Oak Tree Ordinance, no known oak trees exist on the project site. As further discussed in Section 3.4, Biological Resources, of the Draft IS/MND, no native habitat is located on the project site or in the immediately surrounding area. Should the City have any questions regarding this information, the City will contact the County of Los Angeles Fire Department staff referenced in this comment.

1-4 The City appreciates the Health Hazardous Materials Division's review of the Draft IS/MND. The Draft IS/MND evaluates impacts regarding hazardous materials resulting from landfills in Section 3.9, Hazards and Hazardous Materials. Based on the project site's status as a former landfill facility, there is a potential that on-site construction workers could come into contact with soil, landfill gas, landfill liquids, and groundwater during any activities occurring below grade. As such, the Department of Toxic Substances Control (DTSC) will be consulted regarding planning and approach prior to commencing any of these activities. Additionally, given the history of the project site, project activities must adhere to the DTSC-approved remedial action plan. Further, the City shall minimize risk to those working with and handling subsurface soils during the project construction phase. The City shall contact the Cal-EPA Los Angeles Regional Water Quality Control Board regarding the status of the landfill in regards to the presence of methane gas and other potential hazardous materials.

Comment Letter 2

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY Gavin Newsom, Governor

DEPARTMENT OF TRANSPORTATION
DISTRICT 7
100 S. MAIN STREET, MS16
LOS ANGELES, CA 90012
PHONE (213) 897-6536
FAX (213) 897-1337
TTY 711
www.dot.ca.gov

Making Conservation a California Way of Life.

May 8, 2020

Ms. Manraj Bhatia
Community Development Department
City of Carson
701 East Carson Street
Carson, CA 90745

RE: KL Fenix Project
Vic. LA-10/PM 17.122
SCH # 2020040140
Ref. GTS # LA-2020-03162/03210
GTS # LA-2020-03235-MND

Dear Ms. Bhatia:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The project involves the construction and operation of a cargo container parking facility on a 14.3 acre vacant and undeveloped land, which would be used to mobilize both imported and exported goods that pass through the Ports of Los Angeles and Long Beach. The project would include an approximately 53,550-square-foot warehouse and office building on the eastern part of the project site. In addition, the project would include approximately 115 parking spaces for passenger vehicles, 400 spaces for cargo containers, 75 spaces for truck parking, and 6 loading docks.

The mission of Caltrans is to provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability. Senate Bill 743 (2013) mandated that CEQA review of transportation impacts of proposed development be modified by using Vehicle Miles Traveled (VMT) as the primary metric in identifying transportation impacts for all future development projects. For future project, you may reference to The Governor's Office of Planning and Research (OPR) for more information.

http://opr.ca.gov/ceqa/updates/guidelines/

Caltrans is aware of challenges that the region faces in identifying viable solutions to alleviating congestion on State and Local facilities. With limited room to expand vehicular capacity, future development should incorporate multi-modal and complete streets transportation elements that will actively promote alternatives to car use and better manage

"Provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability"

existing parking assets. Prioritizing and allocating space to efficient modes of travel such as bicycling and public transit can allow streets to transport more people in a fixed amount of right-of-way.

Caltrans supports the implementation of complete streets and pedestrian safety measures such as road diets and other traffic calming measures. Please note the Federal Highway Administration (FHWA) recognizes the road diet treatment as a proven safety countermeasure, and the cost of a road diet can be significantly reduced if implemented in tandem with routine street resurfacing.

We encourage the Lead Agency to integrate transportation and land use in a way that reduces Vehicle Miles Traveled (VMT) and Greenhouse Gas (GHG) emissions by facilitating the provision of more proximate goods and services to shorten trip lengths, and achieve a high level of non-motorized travel and transit use. We also encourage the Lead Agency to evaluate the potential of Transportation Demand Management (TDM) strategies and Intelligent Transportation System (ITS) applications in order to better manage the transportation network, as well as transit service and bicycle or pedestrian connectivity improvements.

After reviewing the Mitigated Negative Declaration (MND) for this project and pre-CEQA document submitted to Caltrans, we have the following comments:

1. For Vehicle Miles Traveled (VMT) analysis, since there is no truck traffic data collected for the City at current time, for this project we concur that "based on the project's proximity to I-110, which provides direct access to other regional significant freeway facilities; the project's potential to divert truck traffic from other truck facilities located further away from regional freeway facilities; and, the requirement to implement VMT-reducing Project Design Features, the proposed KL Fenix truck facility would have a less than significant impact to vehicle miles traveled." For future Vehicle Miles Traveled (VMT) analysis, we recommend the City to adopt a VMT threshold including warehouse/trucking land uses. 2-1

2. With pre-CEQA consultation with Caltrans, we concur with City's proposal with the existing Caltrans improvement project under EA 29370 at the intersection of Hamilton Avenue/I-110 SB ramps. The City also proposed to convert the southbound left-through lane to a dedicated left-turn lane and add appropriate signage and striping to prevent vehicle in the left-turn lane to continue southbound through the intersection. Caltrans would consider these improvements before mitigation agreement is signed. We concur the project applicant pay a fair share contribution to all improvements at this location per City's adopted Ordinance No. 2-2

19-1931 on April 16, 2019, which implements the City's Interim Development Impact Fee (IDIF) Program. Mitigation agreement should be prepared and presented to Caltrans by developer. 2-2 Cont.

3. Caltrans concurs Mitigation Measure MM-TRA-1. "Prior to the issuance of the first building permit, the project applicant shall coordinate with the California Department of Transportation (Caltrans) and the City on the redesign of the Figueroa Street/Interstate (I-) 110 northbound ramps intersection to ensure adequate and safe operation at the intersection and project access. The intersection modification shall involve the consolidation of the two project driveways currently proposed along Figueroa Street into a single driveway that is aligned with the present location of the I -110 on- and off ramps (i.e., creation of new east leg of the intersection) or other designs acceptable to Caltrans. The required improvement shall be installed and operational to the satisfaction of Caltrans and the City prior to issuance of the first Certificate of Occupancy." 2-3

4. For MM-TRA-1, Caltrans' Intersection Control Evaluation policy should be applied to determine what is the best traffic control at this subject intersection. As a reminder, if developer proposes traffic signal after ICE evaluation, then developer should provide new proposed signal timing, new proposed signal phasing, and queue analysis for the NB I-110 off-ramp and NB I-110 on-ramp to ensure the adequacy of this improvement during Caltrans permit encroachment process. 2-4

5. For MM-TRA-1, please be reminded that any work performed within the State Right-of-way will require an Encroachment Permit from Caltrans. Any modifications to State facilities must meet all mandatory design standard and specifications. 2-5

6. Storm water run-off is a sensitive issue for Los Angeles and Ventura counties. Please be mindful that projects should be designed to discharge clean run-off water. Additionally, discharge of storm water run-off is not permitted onto State highway facilities without any storm water management plan. 2-6

7. Transportation of heavy construction equipment and/or materials, which requires the use of oversized-transport vehicles on State highways, will require a transportation permit from Caltrans. It is recommended that large size truck trips be limited to off-peak commute periods. 2-7

"Provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability"

Ms. Manraj Bhatia
May 8, 2020
Page 4

If you have any questions, please feel free to contact Alan Lin the project coordinator at (213) 897-8391 and refer to GTS # LA-2020-03235-MND.

Sincerely,

Miya Edmonson

MIYA EDMONSON
IGR/CEQA Branch Chief

cc: Scott Morgan, State Clearinghouse

INTENTIONALLY LEFT BLAN

Response to Comment Letter 2

California Department of Transportation, District 7
Miya Edmonson, IGR/CEQA Branch Chief
May 8, 2020

2-1 The City appreciates Caltrans' review of the Vehicles Miles Traveled (VMT) analysis and appreciates their concurrence with the VMT analysis' methodology, evaluation, and findings. The City is in the process of identifying, evaluating, and eventually proposing and adopting VMT thresholds for the City.

2-2 The City will ensure that the project applicant pays a fair share contribution to the identified improvements at the intersection of Hamilton Avenue/I-110 southbound ramps, and will ensure that the applicant prepare and present the mitigation agreement to Caltrans prior to project implementation.

2-3 The City appreciates Caltrans' review of and concurrence with Mitigation3 Measure (MM) TRA-1.

2-4 The City will ensure that the project applicant applies Caltrans' Intersection Control Evaluation (ICE) policy to determine the best traffic control at the Figueroa Street/Interstate (I-) 110 northbound ramps intersection, and that the applicant provide new proposed signal timing, new proposed signal phasing, and queue analysis to ensure the adequacy of the improvements during the Caltrans permit encroachment process.

2-5 The City acknowledges that the project applicant acquire an Encroachment Permit from Caltrans if work is proposed within the State Right-of-way and adhere to mandatory design standards and specifications.

2-6 The Draft IS/MND evaluates impacts regarding stormwater runoff in Section 3.10, Hydrology and Water Quality. As determined in the Draft IS/MND, following compliance with applicable water quality standards and regulations, impacts associated with stormwater runoff would be less than significant. The City acknowledges that stormwater runoff is not permitted onto State highway facilities without first implementing a storm water management plan.

2-7 The City acknowledges that the use of oversized-transport vehicles on State highways require a transportation permit from Caltrans and that large size truck trips should be limited to off-peak commute periods.

INTENTIONALLY LEFT BLANK

Comment Letter 3

DocuSign Envelope ID: C4139A97-4A6E-444E-8B4E-E4C298159C1A

LOS ANGELES COUNTY SANITATION DISTRICTS
Converting Waste Into Resources

Robert C. Ferrante
Chief Engineer and General Manager
1955 Workman Mill Road, Whittier, CA 90601-1400
Mailing Address: P.O. Box 4998, Whittier, CA 90607-4998
(562) 699-7411 • www.lacsd.org

May 13, 2020

Ref. DOC 5700945

Mr. Manraj Bhatia, Assistant Planner
City of Carson
Community Development Department
701 East Carson Street
Carson CA 90745

Dear Mr. Bhatia:

NOI Response for
KL Fenix Cargo Container Parking Specific Plan Project

The Los Angeles County Sanitation Districts (Districts) received a Notice of Intent to Adopt a Mitigated Negative Declaration (NOI) for the subject project on April 16, 2020. The proposed project is located within the jurisdictional boundary of District No. 8. We offer the following comments regarding sewerage service:

1. The wastewater flow originating from the proposed project will discharge directly to the Districts' Main Street Relief Trunk Sewer, located in Main Street along the east side of the project site. The Districts' 42-inch diameter trunk sewer has a capacity of 20.2 million gallons per day (mgd) and conveyed a peak flow of 4.6 mgd when last measured in 2016. A 6-inch diameter or smaller direct connection to a Districts' trunk sewer requires a Trunk Sewer Connection Permit, issued by the Districts. An 8-inch diameter or larger direct connection to a Districts' trunk sewer requires submittal of Sewer Plans for review and approval by the Districts. For additional information, please contact the Districts' Engineering Counter at (562) 908-4288, extension 1205. 3-1

2. The wastewater generated by the proposed project will be treated at the Joint Water Pollution Control Plant located in the City of Carson, which has a capacity of 400 mgd and currently processes an average flow of 261.1 mgd. 3-2

3. The expected average wastewater flow from the project site, described in the notice as a 14,040 square-foot office and a 39,500 square-foot warehouse, is 3,798 gallons per day. For a copy of the Districts' average wastewater generation factors, go to www.lacsd.org, under Services, then Wastewater Program and Permits, select Will Serve Program, and scroll down to click on the Table 1, Loadings for Each Class of Land Use link. 3-3

4. The Districts are empowered by the California Health and Safety Code to charge a fee to connect (directly or indirectly) to the Districts' Sewerage System for increasing the strength or quantity of wastewater discharged from connected facilities. This connection fee is a capital facilities fee that is imposed in an amount sufficient to construct an incremental expansion of the Sewerage System 3-4

DOC 5713127.D08

5. to accommodate the proposed project. Payment of a connection fee will be required before this project is permitted to discharge to the Districts' Sewerage System. For more information and a copy of the Connection Fee Information Sheet, go to www.lacsd.org, under Services, then Wastewater (Sewage) and select Rates & Fees. In determining the impact to the Sewerage System and applicable connection fees, the Districts will determine the user category (e.g. Condominium, Single Family home, etc.) that best represents the actual or anticipated use of the parcel(s) or facilities on the parcel(s) in the development. For more specific information regarding the connection fee application procedure and fees, the developer should contact the Districts' Wastewater Fee Public Counter at (562) 908-4288, extension 2727.

3-5

6. In order for the Districts to conform to the requirements of the Federal Clean Air Act (CAA), the capacities of the Districts' wastewater treatment facilities are based on the regional growth forecast adopted by the Southern California Association of Governments (SCAG). Specific policies included in the development of the SCAG regional growth forecast are incorporated into clean air plans, which are prepared by the South Coast and Antelope Valley Air Quality Management Districts in order to improve air quality in the South Coast and Mojave Desert Air Basins as mandated by the CCA. All expansions of Districts' facilities must be sized and service phased in a manner that will be consistent with the SCAG regional growth forecast for the counties of Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial. The available capacity of the Districts' treatment facilities will, therefore, be limited to levels associated with the approved growth identified by SCAG. As such, this letter does not constitute a guarantee of wastewater service, but is to advise developer that the Districts intend to provide this service up to the levels that are legally permitted and to inform the developer of the currently existing capacity and any proposed expansion of the Districts' facilities.

3-6

If you have any questions, please contact the undersigned at (562) 908-4288, extension 2717 or araza@lacsd.org.

Very truly yours,

Adriana Raza

Customer Service Specialist
Facilities Planning Department

AR:dc

INTENTIONALLY LEFT BLANK

Response to Comment Letter 3

Los Angeles County Sanitation District
Adriana Raza, Customer Service Specialist
May 13, 2020

3-1 The Draft IS/MND evaluates impacts related to wastewater flow in Section 3.19, Utilities and Service Systems. Wastewater generated at the project site would be treated at the Joint Water Pollution Control Plant (JWPCP). The facility is permitted a total capacity of 400 million gallons per day (LACSD 2020). Wastewater generated by the project would represent only a nominal percentage of the JWPCP average dry-weather flow capacity and average wastewater flow.

3-2 The City acknowledges that the wastewater generated by the project will be treated at JWPCP. As discussed in response to comment 3-1, wastewater generated by the project would represent only a nominal percentage of the JWPCP average dry-weather flow capacity and average wastewater flow. Additionally, the project is dedicated to tractor-trailer parking and related activities, which has no or very low demand for domestic water, municipal sewer, stormwater, and other wet and dry utilities. Thus, the project would not result in the relocation or expansion of existing, or construction of new, wastewater treatment facilities.

3-3 The City acknowledges that the average wastewater flow for the project will be 3,798 gallons per day. As discussed in response to comment 3-1, wastewater generated by the project would represent only a nominal percentage of the JWPCP average dry-weather flow capacity and average wastewater flow.

3-4 The City acknowledges that any new or modified connection to Sanitation Districts of Los Angeles County facilities will require a connection fee and will forward this information to the project applicant.

3-5 See response to comment 3-4, above.

3-6 This comment is acknowledged and the City will forward this information to the project applicant. Should the City have any questions regarding this information, the City will contact the Sanitation Districts of Los Angeles County staff referenced in this letter.

INTENTIONALLY LEFT BLANK

3 Mitigation Monitoring and Reporting Program

The California Environmental Quality Act (CEQA) requires that a public agency adopting a Mitigated Negative Declaration (MND) take affirmative steps to determine that approved mitigation measures are implemented after project approval. The lead or responsible agency must adopt a reporting and monitoring program for the mitigation measures incorporated into a project or included as conditions of approval. The program must be designed to ensure compliance with the MND during project implementation (California Public Resources Code, Section 21081.6(a)(1)).

This Mitigation Monitoring and Reporting Program (MMRP) will be used by the City of Carson (City) to ensure compliance with adopted mitigation measures identified in the MND for the proposed KL Fenix Cargo Container Parking Specific Plan (project) when construction begins. The City, as the lead agency, will be responsible for ensuring that all mitigation measures are carried out. Implementation of the mitigation measures would reduce impacts to below a level of significance for air quality, cultural resources, geology and soils, hazards and hazardous materials, noise, transportation, and tribal cultural resources.

The remainder of this MMRP consists of a table that identifies the mitigation measures by resource for each project component. Table 1 identifies the mitigation monitoring and reporting requirements, list of mitigation measures, party responsible for implementing mitigation measures, timing for implementation of mitigation measures, agency responsible for monitoring of implementation, and date of completion. With the MND and related documents, this MMRP will be kept on file at the following location:

City of Carson
Community Development Department, Planning Division
710 East Carson Street
Carson, California 90745

INTENTIONALLY LEFT BLAN

Table 2. Mitigation Monitoring and Reporting Program

Mitigation Measure	Implementation Timing	Party Responsible For Implementation	Party Responsible For Monitoring	Date of Completion/Notes
Air Quality				
MM-AQ-1: To reduce the potential for health risks as a result of construction of the project, the applicant shall: A. Prior to the start of construction activities, the project applicant, or its designee, shall ensure that all 75 horsepower or greater diesel-powered equipment are powered with California Air Resources Board–certified Tier 4 Interim engines, except where the project applicant establishes to the satisfaction of the City of Carson that Tier 4 Interim equipment is not available. B. All other diesel-powered construction equipment will be classified as Tier 3 or higher, at a minimum, except where the project applicant establishes to the satisfaction of the City of Carson that Tier 3 equipment is not available. In the case where the applicant is unable to secure a piece of equipment that meets the Tier 4 Interim requirement, the applicant may upgrade another piece of equipment to compensate (from Tier 4 Interim to Tier 4 Final). Engine Tier requirements in accordance with this measure shall be incorporated on all construction plans.	Prior to and during construction	Project applicant and their construction contractor	City of Carson	
Cultural Resources				
MM-CUL-1: If archaeological resources (sites, features, or artifacts) are exposed during construction activities for the project, all construction work occurring within 100 feet of the find shall immediately stop until a qualified archaeologist, meeting	During construction	Project applicant and their construction contractor	City of Carson	

Mitigation Measure	Implementation Timing	Party Responsible For Implementation	Party Responsible For Monitoring	Date of Completion/Notes
the Secretary of the Interior's Professional Qualification Standards, can evaluate the significance of the find and determine whether or not additional study is warranted. Depending on the significance of the find under the California Environmental Quality Act (CEQA) (14 CCR 15064.5[f]; California Public Resources Code, Section 21082), the archaeologist may simply record the find and allow work to continue. If the discovery proves significant under CEQA, additional work, such as preparation of an archaeological treatment plan and data recovery, may be warranted.				
Geology and Soils				
MM-GEO-1: If excavations reach depths below human-transported fill materials, a qualified paleontologist meeting the 2010 Society of Vertebrate Paleontologists (SVP) standards should be retained to determine when and where paleontological monitoring is warranted. The qualified paleontologist or a qualified paleontological monitor meeting the 2010 SVP standards under the direction of the qualified paleontologist shall conduct the paleontological monitoring. If the sediments are determined by the qualified paleontologist to be too young or too coarse-grained to likely preserve paleontological resources, the qualified paleontologist can reduce or terminate monitoring per the 2010 SVP guidelines and based on the excavations remaining for the project.	During construction	Project applicant and their construction contractor	City of Carson	
Hazards and Hazardous Materials				
MM-HAZ-1: Prior to, during, and following construction of the project, specified programs and actions recommended in the remedial action plan (RAP) and approved by the Department of Toxic Substances Control (DTSC) shall be implemented in accordance with the RAP. Any potential variation to the RAP's recommendations shall be discussed with and approved by the DTSC prior to implementation. Evidence of compliance with the RAP shall be provided in a timely manner to the City of Carson and available to review in the project file.	Prior, during, and following construction	Project applicant	City of Carson	

Mitigation Measure	Implementation Timing	Party Responsible For Implementation	Party Responsible For Monitoring	Date of Completion/Notes
MM-HAZ-2: Before issuance of a grading permit, a licensed contractor shall prepare a hazardous materials contingency plan (HMCP) and submit the plan to the City of Carson. The purpose of the HMCP is to protect on-site construction workers and off-site receptors in the vicinity of the construction site. The HMCP shall describe the practices and procedures to be implemented to protect worker health in the event of an accidental release of hazardous materials, or if previously undiscovered hazardous materials are encountered during construction. The HMCP shall include items such as spill prevention, cleanup, and evacuation procedures. The HMCP shall help protect the public and workers by providing procedures and contingencies to help reduce exposure to hazardous materials.	Prior to construction	Project applicant and their construction contractor	City of Carson	
MM-HAZ-3: The proposed warehouse/office building and any other on-site habitable structure shall include a vapor mitigation system such as a vapor barrier, passive venting, and/or similar method. The design of the vapor mitigation system shall be approved by the Department of Toxic Substances Control (DTSC) as part of DTSC's review of the remedial action plan (RAP) and any approved variations to the RAP. Evidence of installation of the vapor mitigation system shall be provided to the City of Carson within 2 weeks of the completion of installation. DTSC-approved performance measures shall be established to ensure that the vapor mitigation system is operating correctly and preventing unacceptable volatile chemical concentrations from migrating up and into the overlying structure. An operations and maintenance plan shall be prepared that identifies the performance measures and shall state the methods by which the performance goals will be tested and verified.	Prior to construction	Project applicant and their construction contractor	City of Carson	
Noise				
MM-NOI-1: At least 30 days prior to commencement of construction, the contractor shall provide written notice to all residential property owners and tenants within 300 feet of the	Prior to construction	Project applicant and their construction	City of Carson	

Mitigation Measure	Implementation Timing	Party Responsible For Implementation	Party Responsible For Monitoring	Date of Completion/Notes
project site that proposed construction activities could affect outdoor or indoor living areas. The notice shall contain a description of the project, a construction schedule including days and hours of construction, and a description of noise-reduction measures.		contractor		
MM-NOI-2: Noise-generating construction activities (which may include preparation for construction work) shall be permitted weekdays between 7:00 a.m. and 6:00 p.m., excluding federal holidays. When a holiday falls on a Saturday or Sunday, the preceding Friday or following Monday, respectively, shall be observed as a legal holiday.	Prior to construction	Project applicant and their construction contractor	City of Carson	
MM-NOI-3: Stationary construction equipment that generates noise that exceeds 85 A-weighted decibels at the property boundaries shall be shielded with a barrier that meets a Sound Transmission Class rating of 25.	Prior to construction	Project applicant and their construction contractor	City of Carson	
MM-NOI-4: All construction equipment powered by internal combustion engines shall be properly muffled and maintained. No internal combustion engine shall be operated on the site without a muffler. All diesel equipment shall be operated with closed engine doors and shall be equipped with factory recommended mufflers. Unnecessary idling of internal combustion engines shall be prohibited.	Prior to construction	Project applicant and their construction contractor	City of Carson	
MM-NOI-5: Air compressors and generators used for construction shall be surrounded by temporary acoustical shelters. Whenever feasible, electrical power shall be used to run air compressors and similar power tools.	Prior to construction	Project applicant and their construction contractor	City of Carson	
MM-NOI-6: A temporary construction sound barrier wall shall be installed along the easterly and southerly project site boundaries. Entry gates for construction vehicles shall be closed when vehicles are not entering or exiting the site. The barrier shall be made of sound-attenuating material (not landscaping). To effectively reduce sound transmission through the barrier, the material chosen must be rigid and sufficiently dense (at least 20 kilograms per square meter). All noise barrier material types are	Prior to construction	Project applicant and their construction contractor	City of Carson	

Mitigation Measure	Implementation Timing	Party Responsible For Implementation	Party Responsible For Monitoring	Date of Completion/Notes
equally effective, acoustically, if they have this density. For example, 5/8-inch plywood, mounted with no gaps between adjacent sheets, would be of sufficient density to achieve the target attenuation. The barrier shall be 8 feet in height from the ground surface on the construction side of the wall to achieve the goal of blocking direct line of sight to the adjacent residence windows. It is estimated that a noise barrier of the prescribed density would reduce average noise levels to sensitive receptors by approximately 8 A-weighted decibels or more by blocking direct line of sight to ground-level receptors.				
Transportation				
MM-TRA-1: Prior to the issuance of the first building permit, the project applicant shall coordinate with the California Department of Transportation (Caltrans) and the City on the redesign of the Figueroa Street/Interstate (I-) 110 northbound ramps intersection to ensure adequate and safe operation at the intersection and project access. The intersection modification shall involve the consolidation of the two project driveways currently proposed along Figueroa Street into a single driveway that is aligned with the present location of the I-110 on- and off ramps (i.e., creation of new east leg of the intersection) or other designs acceptable to Caltrans. The required improvement shall be installed and operational to the satisfaction of Caltrans and the City prior to issuance of the first Certificate of Occupancy.	Prior to construction	Project applicant	City of Carson	
Tribal Cultural Resources				
MM-CUL-1: If archaeological resources (sites, features, or artifacts) are exposed during construction activities for the project, all construction work occurring within 100 feet of the find shall immediately stop until a qualified archaeologist, meeting the Secretary of the Interior's Professional Qualification Standards, can evaluate the significance of the find and determine whether or not additional study is warranted. Depending on the significance of the find under the California	During construction	Project applicant and their construction contractor	City of Carson	

Mitigation Measure	Implementation Timing	Party Responsible For Implementation	Party Responsible For Monitoring	Date of Completion/Notes
Environmental Quality Act (CEQA) (14 CCR 15064.5[f]; California Public Resources Code, Section 21082), the archaeologist may simply record the find and allow work to continue. If the discovery proves significant under CEQA, additional work, such as preparation of an archaeological treatment plan and data recovery, may be warranted.				

4 References Cited

14 CCR 15000–15387 and Appendices A through L. Guidelines for Implementation of the California Environmental Quality Act, as amended.

Los Angeles County Sanitation District (LACSD). 2020. Local Wastewater Treatment Facility Honored for Achievements. Accessed May 18, 2020. https://www.lacsd.org/news/displaynews.asp?NewsID=107&targetid=1.

INTENTIONALLY LEFT BLANK