

APPENDIX A

*Notice of Preparation of a Draft Environmental
Impact Report and Notice of Public Scoping
Meeting, Initial Study, and Scoping Comments*

**NOTICE OF PREPARATION OF A
DRAFT ENVIRONMENTAL IMPACT REPORT
AND
NOTICE OF PUBLIC SCOPING MEETING**

To: All Interested Agencies, Organizations and Persons

From: The County of Los Angeles

Subject: Notice of Preparation of a Draft Environmental Impact Report and Public Scoping Meeting

Project Title: Carol Kimmelman Sports and Academic Campus

Project Proponent: The Carol Kimmelman Center, LLC

Project Address: 340 Martin Luther King, Jr. Street

Date of Notice: July 31, 2018

The County of Los Angeles (County) will be the Lead Agency and will require the preparation of an Environmental Impact Report (EIR) for the Carol Kimmelman Sports and Academic Campus (the Project) proposed by The Carol Kimmelman Center, LLC, a Delaware nonprofit limited liability company. The County requests agencies' timely comments as to the scope and content of the EIR related to the agencies' responsibilities. For all interested agencies, organizations and persons, this scoping notice allows you an early opportunity to consult on the Project before preparation of the Draft EIR. Following preparation of the Draft EIR, there will be a later separate notice of the future opportunity to comment on the analyses of the Project in the Draft EIR.

The Project description, the potential environmental effects anticipated to be studied in the EIR, and the environmental factors not potentially affected that would not be addressed in the EIR are set forth in the Initial Study and summarized here. Also included below are the date, time, and location of the Scoping Meeting that will be held in order to solicit input regarding the content of the Draft EIR. The Scoping Meeting will be in an open house format. No decisions about the Project will be made at the scoping meeting. A copy of the Initial Study prepared for the Project is not attached due to its length, but is available for public review online at <https://bit.ly/2LsS3Uu>, or at <https://kimmelmancenter.org>, and in hard copy by appointment at Los Angeles County Department of Public Works, Project Management Division II, 900 South Fremont Avenue, 5th Floor, Alhambra, CA 91803. Appointment requests should be made to Ryan Kristan at rkristan@dpw.lacounty.gov or at (626) 300-3271.

PROJECT BACKGROUND AND SUMMARY DESCRIPTION: The proposed Project involves the development of the Carol Kimmelman Sports and Academic Campus on a site located at 340 Martin Luther King Jr. Street in the City of Carson, California consisting of approximately 87 acres in the northeastern portion of the existing Victoria Golf Course and adjacent tennis courts (the Project Site). The Project Site is located northeast of the Dominguez Channel and east of the junction of the 405 and 110 Freeways. The Project Site is bounded by Martin Luther King Jr. Street to the north, Avalon Boulevard to the east, and the balance of the Victoria Golf Course property to the south and west.

The proposed Project includes a tennis center and soccer center for underserved youth as well as programs for adults. The tennis center component would include a welcome center, tennis courts for all ages and skill levels, and training facilities. Also located in the tennis center component would be a learning center that would provide academic counseling, mentorship, and enrichment services. The soccer center component would include soccer fields, multi-purpose fields and support buildings. The Project Site would be developed with up to approximately 75,000 square feet of buildings, with possible expansion space for an additional 22,000 square feet of buildings. Up to an additional 5,000 square feet of miscellaneous support buildings, including maintenance facilities, restrooms, and sheds, would be constructed throughout the Project.

The approximately 29-acre tennis center would include approximately: a 23,000-square-foot welcome center, 50 tennis courts of various sizes, a 5,000-square-foot administration building, a spectator venue with up to 12 hard courts and a total of 1200 seats, a 13,000-square-foot player development building, and outdoor training spaces including a 100-meter sprint track, two basketball courts, and a training turf, a maintenance facility, and vehicle and bus parking.

Adjacent to the tennis center would be an approximately 25,000-square-foot learning center. The learning center would include classrooms, quiet rooms, and staff support for homework, counseling and tutoring. The welcome center and learning center would be in the main entrance area within the northwest portion of the Project Site.

The approximately 58-acre soccer center would provide up to two full-sized artificial turf soccer fields, two natural grass multipurpose fields, six full-sized natural grass soccer fields, a support building, and vehicle parking with two additional overflow parking areas between the fields and South Avalon Boulevard.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED: Aesthetics, Air Quality, Biological Resources, Cultural Resources, Geology and Soils, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Hydrology and Water Quality, Noise, Public Services, Recreation, Transportation and Traffic, Tribal Cultural Resources, Utilities and Service Systems, and Mandatory Findings of Significance. These potential impacts will be addressed in the Draft EIR.

ENVIRONMENTAL FACTORS NOT POTENTIALLY AFFECTED: Based on the Initial Study, the following environmental factors do not need to be addressed in the Draft EIR: Agriculture and Forestry Resources, Land Use and Planning, Mineral Resources, Population and Housing.

PUBLIC SCOPING MEETING DATE AND LOCATION: A Scoping Meeting will be held on August 14, 2018, from 6:00 P.M. to 8:00 P.M. at the Victoria Community Regional Park, 419 Martin Luther King Jr. Street, Carson, CA 90746. Parking is available at the park.

The purpose of the Scoping Meeting is to solicit agency and other early comments regarding environmental issues to be addressed in the Draft EIR. The Scoping Meeting will provide information regarding the proposed Project and the anticipated scope of analyses to be contained in the Draft EIR. Written comments may be submitted at the Scoping Meeting or at any time before the end of scoping on **August 31, 2018**. Attendance at the Scoping Meeting is not required, and written comments on the scope of the Draft EIR by US mail or email are welcome at the County of Los Angeles Department of Public Works address provided below.

Written comments must be submitted to the County of Los Angeles by **August 31, 2018**, to be timely scoping comments for consideration in the preparation of the Draft EIR.

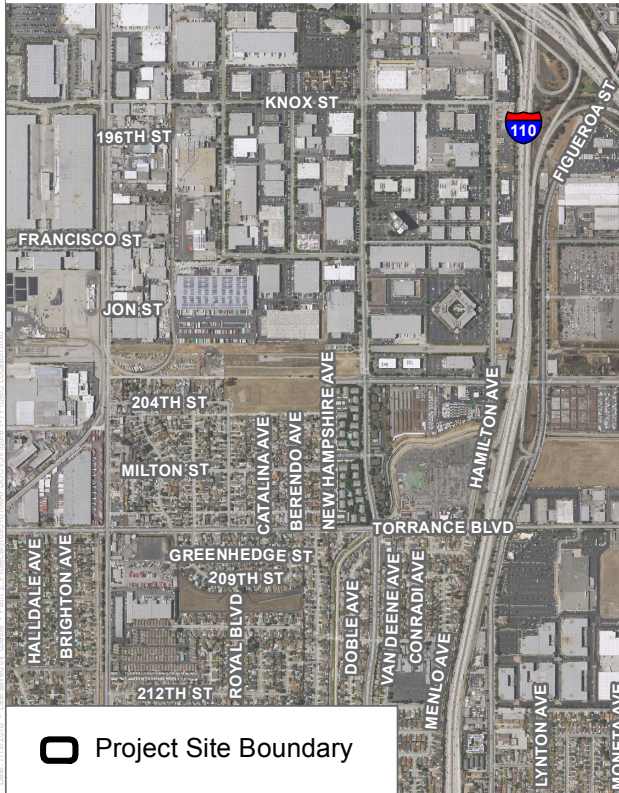
Please direct your comments by e-mail or U.S. mail to:

Ryan Kristan
County of Los Angeles Department of Public Works
Project Management Division II
900 South Fremont Avenue, 5th Floor
Alhambra, California 91803
(626) 300-3271
E-Mail: rkristan@dpw.lacounty.gov



Sorin Alexanian
Deputy Director
Department of Regional Planning

Attachments:
Project Location Map
Conceptual Site Plan
Scoping Meeting Location Map



 Project Site Boundary

SOURCE: NAIP 2016



Project Location

Carol Kimmelman Sports and Academic Campus



★ Scoping Meeting Location
 Project Site Boundary

SOURCE: NAIP 2016





LEGEND

TENNIS CENTER

- 1 WELCOME CENTER
- 2 LEARNING CENTER
- 3 ENTRY PLAZA
- 4 BASKETBALL COURTS
- 5 COMPETITION VENUE (12 HARD COURTS)
- 6 PLAYER DEVELOPMENT / COLLEGIATE CENTER
- 7 TOURNAMENT/ LEAGUE ADMINISTRATION BUILDING
- 8 100M SPRINT TRACK
- 9 4 CLAY COURTS
- 10 MONUMENT ENTRY/ SIGN
- 11 CENTRAL PLAZA
- 12 8 36 FT COURTS
- 13 4 60 FT COURTS (+4 FUTURE COURTS)
- 14 TRAINING TURF
- 15 TENNIS CENTER COURTS (24 HARD COURTS)
- 16 FUTURE COVERED COURTS (6 COURTS)
- 17 MAINTENANCE BUILDING
- 18 OUTDOOR EXERCISE COURSE
- 19 VISITOR PARKING
- 20 BUS PARKING
- 21 EMPLOYEE PARKING
- 22 OVERFLOW PARKING

SOCCER CENTER

- 23 2 NATURAL GRASS MULTIPURPOSE FIELDS
- 24 6 FULL SIZE NATURAL GRASS SOCCER FIELDS
- 25 2 FULL SIZE ARTIFICIAL TURF SOCCER FIELDS
- 26 SUPPORT BUILDING
- 27 SOCCER PARKING
- 28 OVERFLOW PARKING

ILLUSTRATIVE OVERALL SITE PLAN

07/20/2018

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Initial Study Checklist
Carol Kimmelman Sports and Academic Campus

Prepared for:

County of Los Angeles

Kenneth Hahn Hall of Administration
500 West Temple Street
Los Angeles, California 90012

Contact:
Ryan Kristan

Prepared by:

DUDEK

38 North Marengo Avenue
Pasadena, California 91101

Contact: Nicole Cobleigh

JULY 2018

**Initial Study Checklist
Carol Kimmelman Sports and Academic Campus**

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ACRONYMS AND ABBREVIATIONS

Acronym/Abbreviation	Definition
AQMP	Air Quality Management Plan
BKK	Ben K. Kazarian
BMP	best management practice
CEQA	California Environmental Quality Act
CNDDDB	California Natural Diversity Database
CNPS	California Native Plant Society
CO	carbon monoxide
CRPR	California Rare Plant Rank
dBA	A-weighted decibel
EIR	environmental impact report
GHG	greenhouse gas
I	Interstate
K-5	kindergarten through fifth-grade
L _{eq}	equivalent sound level
MM	Mitigation Measure
MMRP	Mitigation Monitoring and Reporting Plan
NO ₂	nitrogen dioxide
O ₃	ozone
OU	Operable Unit
PM ₁₀	coarse particulate matter
PM _{2.5}	fine particulate matter
SCAB	South Coast Air Basin
SCAQMD	South Coast Air Quality Management District
SO ₂	sulfur dioxide
USFWS	U.S. Fish and Wildlife Service

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Carol Kimmelman Sports and Academic Campus

1 INTRODUCTION

1. **Project title:**

Carol Kimmelman Sports and Academic Campus Project

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

County of Los Angeles
Kenneth Hahn Hall of Administration
500 West Temple Street
Los Angeles, California 90012

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

Ryan Kristan
Phone: (626) 300-3271

4. **Project location:**

340 Martin Luther King Jr. Street
Carson, California 90746

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

The Carol Kimmelman Center, LLC
2121 East 7th Place
Los Angeles, California 90021

6. **General plan designation:**

Special Use Facility, County of Los Angeles General Plan
Recreational Open Space, City of Carson General Plan

7. **Zoning:**

OS-ORL, Open Space–Organic Refuse Landfill, City of Carson Zoning Code
(Section 9151.12)

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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):**

Introduction

The Carol Kimmelman Center, LLC proposes to redevelop a portion of a golf course with new recreation uses including a new sports and academic campus (project or proposed project) on a site located at 340 Martin Luther King Jr. Street in the County of Los Angeles, City of Carson (City), as shown on Figure 1-1, Project Location. The County of Los Angeles (County) is the owner of the proposed project site and currently leases the site for the provision of golf course operations. The proposed project involves redevelopment of the existing Links at Victoria Golf Course and adjacent tennis courts (Victoria Golf Course) with new recreation programs that would offer sports and academic enrichment services to underprivileged youth in the greater Los Angeles area and recreational programs for the public. The proposed project involves the development of the Carol Kimmelman Sports and Academic Campus on approximately 87 acres in the northeastern portion of the existing 178-acre golf course.

Background

Prior to the Victoria Golf Course's current use as a County golf course, it was the site of a portion of the former Ben K. Kazarian (BKK) landfill, which operated as a Class II municipal solid waste landfill from 1948 to 1959. The California Department of Toxic Substances Control (DTSC) is overseeing the former landfill's remediation. The entire former landfill site is divided into Operable Units (OU) focused on two separate remediation operations, of which the Victoria Golf Course site is OU-2. Remediation activities at the site began in December 2006 and are ongoing. The Final Remedial Investigation/Feasibility Study Report for soil and landfill gas media was completed in 2014 and the Remedial Action Plan ("RAP") was completed in 2016. Groundwater contamination will be addressed separately as another OU for the entire former landfill and will be subject to its own Remedial Investigation/Feasibility Study and Remedial Action Plan.

Beginning in 1966, the County leased the site in connection with the opening of the Victoria Golf Course in the same year. The existing Victoria Golf Course includes an 18-hole golf course, driving range, pro shop building, and related surface parking. Plenitude Holdings, LLC is the current tenant and operator of the County Victoria Golf Course.

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Proposed Project

The proposed project would consist of the redevelopment of 87 acres in the northeastern portion of the existing 187-acre Victoria Golf Course site for public recreation purposes, as shown on Figure 1-2, Site Plan. The project would include a tennis center and soccer center for underserved youth as well as programs for adults. The tennis center component would include a welcome center, tennis courts for all ages and skill levels, and training facilities. Also located in the tennis center component would be a learning center that would provide academic counseling, mentorship, and enrichment services. The soccer center component would include soccer fields, multi-purpose fields and support buildings. The project site would be developed with up to approximately 75,000 square feet of buildings, with possible expansion space for an additional 22,000 square feet of buildings. Up to an additional 5,000 square feet of miscellaneous support buildings, including maintenance facilities, restrooms, and sheds, would be constructed throughout the project.

A separate project is proposed by Plenitude Holdings, LLC (Plenitude) for the southerly portion of the existing Victoria Golf Course. As currently proposed, the Plenitude project would consist of sports, recreational and entertainment uses, restaurants, community center and community park. The Plenitude project will be included as a Related Project in the EIR.

Tennis Center

The tennis center component of the project would be approximately 29 acres and would include a 23,000-square-foot welcome center, a spectator venue with up to 12 hard courts and a total of 1,200 seats, 50 tennis courts of various sizes, a 5,000-square-foot administration building, a 13,000-square-foot player development building, and outdoor training spaces including a 100-meter sprint track, two basketball courts, a training turf a maintenance facility, and vehicle and bus parking.

Adjacent to the tennis center would be an approximately 25,000-square-foot learning center. The learning center would include classrooms, quiet rooms, and staff support for homework, counseling, and tutoring.

The welcome center and learning center would be located in the main entrance area within the northwest portion of the project site.

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Soccer Center

The approximately 58-acre soccer center would provide up to two full-sized artificial turf soccer fields, two natural grass multipurpose fields, and six full-sized natural grass soccer fields, a support building, and vehicle parking with two additional overflow parking areas between the fields and South Avalon Boulevard.

Construction

Project construction is projected to begin upon project approval (estimated in April 2019) and last approximately 15 months with the intention of opening the center to the public in summer 2020. Construction activities would involve demolition of a portion of the existing golf course and associated facilities, site preparation, including compaction and importing of fill material to the site, and construction of the proposed facilities.

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

The proposed project site is owned by the County of Los Angeles and is located in the City of Carson. The site is northeast of the Dominguez Channel and east of the junction of Interstate 405 (I-405) and I-110. The project site is bounded by Martin Luther King Jr. Street to the north, South Avalon Boulevard to the east, and the remaining portion of the Victoria Golf Course to the south and west.

Northwest of the project site are the County of Los Angeles Cricket Fields, and directly north of the project site across Martin Luther King Jr. Street are County of Los Angeles Victoria Community Regional Park and Towne Avenue Elementary School, which is a Los Angeles Unified School District kindergarten through fifth grade (K–5) school. Approximately 0.5 miles northeast of the project site is StubHub Center, and the California State University, Dominguez Hills campus is located approximately 1.2 miles northeast of the project site. East of the project site and South Avalon Boulevard is a predominantly single-family residential neighborhood.

Approximately 0.8 miles southeast of the project site is a commercial shopping center known as the South Bay Pavilion, and south of the project site is East Del Amo Boulevard and land currently used by Victoria Golf Course. West of the project site is the land currently used by Victoria Golf Course, an undeveloped swath of land between I-405 and the golf course, and the Goodyear Blimp Airship Base, the I-405, the Porsche Experience Center and a 157-acre vacant former landfill site facing the I-405 and Del Amo Boulevard.

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

- County of Los Angeles
 - Approval of ground lease – Chief Executive Office and Department of Parks and Recreation
 - Site plan review – Department of Regional Planning
 - Building permits, grading permits, and other construction-related permits – Department of Public Works
- Other actions as may be required by other local, regional and state agencies including, but not limited to the City of Carson, the DTSC, the Los Angeles Regional Water Quality Control Board, and the South Coast Air Quality Management District (SCAQMD).

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, has consultation begun?

Note: Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (See Public Resources Code section 21083.3.2.) Information may also be available from the California Native American Heritage Commission's Sacred Lands File per Public Resources Code section 5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code section 21082.3(c) contains provisions specific to confidentiality.

The County has initiated the tribal consultation process, as required under Public Resources Code section 21080.3.1. A total of 5 letters were sent to the following Native American tribes on July 16, 2018: Fernandeno Tataviam Band of Mission Indians; San Manuel Band of Mission Indians; Tejon Indian Tribe; San Gabriel Band of Mission Indians; and Gabrieleno Band of Mission Indians – Kizh Nation.

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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.

- | | | |
|--|---|---|
| <input checked="" type="checkbox"/> Aesthetics | <input type="checkbox"/> Agriculture and Forestry Resources | <input checked="" type="checkbox"/> Air Quality |
| <input checked="" type="checkbox"/> Biological Resources | <input checked="" type="checkbox"/> Cultural Resources | <input checked="" type="checkbox"/> Geology and Soils |
| <input checked="" type="checkbox"/> Greenhouse Gas Emissions | <input checked="" type="checkbox"/> Hazards and Hazardous Materials | <input checked="" type="checkbox"/> Hydrology and Water Quality |
| <input type="checkbox"/> Land Use and Planning | <input type="checkbox"/> Mineral Resources | <input checked="" type="checkbox"/> Noise |
| <input type="checkbox"/> Population and Housing | <input checked="" type="checkbox"/> Public Services | <input checked="" type="checkbox"/> Recreation |
| <input checked="" type="checkbox"/> Transportation and Traffic | <input checked="" type="checkbox"/> Tribal Cultural Resources | <input checked="" type="checkbox"/> Utilities and Service Systems |
| <input checked="" type="checkbox"/> Mandatory Findings of Significance | | |

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DETERMINATION: (To be completed by the Lead Agency)

On the basis of this initial evaluation:

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

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

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

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

- I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier 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 proposed project, nothing further is required.

Signature



Date

7.30.18

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2 EVALUATION OF ENVIRONMENTAL IMPACTS

1. A brief explanation is required for all answers except “No Impact” answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A “No Impact” answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
2. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. “Potentially Significant Impact” is appropriate if there is substantial evidence that an effect may be significant. If there are one or more “Potentially Significant Impact” entries when the determination is made, an Environmental Impact Report (EIR) is required.
4. “Negative Declaration: Less Than Significant With Mitigation Incorporated” applies where the incorporation of mitigation measures has reduced an effect from “Potentially Significant Impact” to a “Less Than Significant Impact.” The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from “Earlier Analyses,” as described in (5) below, may be cross-referenced).
5. Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
 - a. Earlier Analysis Used. Identify and state where they are available for review.
 - b. Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c. Mitigation Measures. For effects that are “Less than Significant with Mitigation Measures Incorporated,” describe the mitigation measures which were incorporated or

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refined from the earlier document and the extent to which they address site-specific conditions for the project.

6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
7. Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
8. This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.
9. The explanation of each issue should identify:
 - a. The significance criteria or threshold, if any, used to evaluate each question; and
 - b. The mitigation measure identified, if any, to reduce the impact to less than significance.

2.1 Aesthetics

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
I. AESTHETICS – Would the project:				
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Substantially damage scenic resources including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

Less Than Significant Impact. The project site is currently used as a portion of a County golf course and is visible from surrounding land uses, including I-405 to the west, Victoria Park and Towne Avenue Elementary School to the north, and the residential community to the east. The project site is not located within a designated scenic vista area, and as such, visual changes at the project site would not adversely affect scenic vistas. For those who

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have visual access to the project site from public vantage points, viewers currently see open space associated with the existing golf course. Implementation of the proposed project would replace the existing recreational golf course with recreational facilities for soccer and tennis in a landscaped setting. As such, the existing open space and recreational character of the site would be maintained with project implementation. Given that the project site is not associated with any scenic vistas and that the existing open space and recreational character of the site would be retained with project implementation, impacts would be less than significant. This issue will not require further environmental analysis in the EIR prepared for the project.

- 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. According to the California Department of Transportation (Caltrans 2018), no scenic highways are located within the vicinity of the project site. The closest officially designated state scenic highway to the project site is State Route 2, Angeles Crest Highway, located north of La Canada–Flintridge in the northern portion of Los Angeles County. The project site is not visible from this state-designated scenic highway, nor is the highway visible from the project site. As such, implementation of the proposed project would not substantially degrade scenic resources within a state scenic highway. No impacts would occur, and this issue will not require further environmental analysis in the EIR prepared for the project.

- c) *Would the project substantially degrade the existing visual character or quality of the site and its surroundings?*

Less Than Significant Impact. The project site is currently used as a County golf course and is visible from surrounding land uses, including I-405 to the west, Victoria Park and Towne Avenue Elementary School to the north, and the residential community to the east. For those who have visual access to the project site from public vantage points, viewers currently see green open space associated with the existing golf course, the club house, parking and fencing and lighting associated with the golf course. Implementation of the proposed project would replace the existing recreational golf course with recreational facilities for soccer and tennis within a landscaped setting. Conceptual drawings of both the tennis center and the soccer center are shown on Figure 2-1, Tennis Center, and Figure 2-2, Soccer Fields. As shown in the project renderings, the existing open space and recreational character of the site would be maintained with project implementation. Viewers to the north and east would continue to experience recreational, open space views.

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As such, impacts would be less than significant and this issue will not require further environmental analysis in the EIR prepared for the project.

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

Potentially Significant Impact. The existing driving range at the project site includes nighttime lighting. The proposed project would include tennis and soccer facilities that would be used during evening and nighttime hours and therefore including nighttime lighting. As such, nighttime lighting is proposed as part of the project. Lighting would be directed onto the playing surfaces. However, given the proximity to nearby light-sensitive receptors there is a potential for the project to alter nighttime lighting patterns in the vicinity of the project site such that impacts would be potentially significant. The EIR prepared for the proposed project will include an evaluation of whether nighttime lighting would adversely affect adjacent light-sensitive uses.

2.2 Agriculture and Forestry Resources

	Potentially Significant Impact	Less Than Significant 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

- 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. Per the Farmland Mapping and Monitoring Program of the California Department of Conservation (DOC 2018), the project site is not mapped as prime farmland, unique farmland, or farmland of statewide importance. The project site is currently developed as a portion of a County golf course, and implementation of the proposed recreational project would not convert farmland to non-agricultural use. No impacts would occur, and this issue will not require further environmental analysis in the EIR prepared for the project.

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

No Impact. The project site is not zoned for agricultural use and is not under a Williamson Act contract. The project site is currently developed as a portion of a County golf course. The County General Plan Parks and Recreation Element designates the site as a “Special Use Facility.”¹ As such, construction and operation of the proposed recreational project would not result in a conflict with existing zoning for agricultural use. No impacts would occur, and this issue will not require further environmental analysis in the EIR prepared for the project.

¹ According to the City of Carson General Plan (City of Carson 2004), the land use designation for the project site is Recreational Open Space. Per the City’s Zoning Code, the site is zoned OS-ORL, Open Space–Organic Refuse Landfill.

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- 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. The project site is not zoned as forest land or timberland use. The project site is currently developed as a portion of a golf course. The County General Plan Parks and Recreation Element designates the site as a “Special Use Facility.”² As such, construction and operation of the proposed recreational project would not result in a conflict with existing zoning for forest land or timberland use. No impacts would occur, and this issue will not require further environmental analysis in the EIR prepared for the project.

- 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 currently developed as a portion of a County golf course and used for recreational open space. As such, construction and operation of the proposed recreational project would not result in the loss of forest land. No impacts would occur, and this issue will not require further environmental analysis in the EIR prepared for the project.

- 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 currently developed and used as a portion of a County golf course. The project site is not used for agricultural, forest land, or timberland use. Additionally, the project site is not mapped as Farmland. As such, construction and operation of the proposed recreational project would not convert or make changes to existing agricultural, Farmland, or forest land uses. No impacts would occur, and this issue will not require further environmental analysis in the EIR prepared for the project.

² According to the City of Carson General Plan (City of Carson 2004), the land use designation for the project site is Recreational Open Space. Per the City’s Zoning Code, the site is zoned OS-ORL, Open Space–Organic Refuse Landfill.

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2.3 Air Quality

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
III. AIR QUALITY – Where available, the significance criteria established by the applicable air quality management 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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) 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 (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Expose sensitive receptors to substantial pollutant concentrations?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Create objectionable odors affecting a substantial number of people?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

Potentially Significant Impact. The proposed project is located in the South Coast Air Basin (SCAB), which is under the jurisdiction of SCAQMD. The most recent applicable air quality plan is the SCAQMD 2016 Air Quality Management Plan (AQMP), which outlines reduction and control measures to mitigate emissions based on existing and projected land use and development. SCAQMD has established criteria for determining consistency with the 2016 AQMP in Chapter 12, Sections 12.2 and 12.3, of the SCAQMD California Environmental Quality Act (CEQA) Air Quality Handbook (SCAQMD 1993). These criteria are as follows:

- **Consistency Criterion No. 1:** The proposed 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.
- **Consistency Criterion No. 2:** The proposed project will not exceed the assumptions in the AQMP or increments based on the year of project buildout and phase.

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Due to the earthwork required for the proposed project, including haul truck trips required to import fill material, there is a potential for the project to result in significant air quality impacts. As such, the EIR will evaluate the project's consistency with the SCAQMD 2016 AQMP based on the SCAQMD guidance.

- b) *Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation?*

Potentially Significant Impact. The proposed project would be required to comply with all relevant federal, state, and local air quality regulations. Nonetheless, the proposed project may generate short-term criteria air pollutant emissions associated with import and movement of soil, pollutant emissions associated with entrained dust (earth movement), and internal combustion engines used by on-site construction equipment and from off-site worker vehicles and truck trips, as well as impacts to air quality during operation of the proposed project. As such, the EIR will evaluate the project's potential to violate air quality standards and/or contribute substantially to an existing or projected air quality violation.

- c) *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 (including releasing emissions which exceed quantitative thresholds for ozone precursors)?*

Potentially Significant Impact. The SCAB is designated as a nonattainment area for both federal and state ozone (O₃) standards and fine particulate matter (PM_{2.5}) standards. The SCAB is designated as a nonattainment area for state coarse particulate matter (PM₁₀) standards; however, it is designated as an attainment area for federal PM₁₀ standards. The SCAB is designated as an attainment area under the state and federal standards for nitrogen dioxide (NO₂), carbon monoxide (CO), and sulfur dioxide (SO₂) 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 (EPA 2017; CARB 2017). Due to the amount of vehicle trips and quantity of earthmoving activities associated with project construction as well as potential increases in vehicle trips during project operation, air quality emissions anticipated to result from construction and operation of the proposed project would be potentially significant and as such will be quantified as part of the EIR. The analysis in the EIR will indicate whether the proposed project would result in a cumulatively considerable net increase in criteria air pollutants for which the SCAB has been designated non-attainment.

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

Potentially Significant Impact. According to the SCAQMD, sensitive receptors include residences, schools, playgrounds, childcare centers, long-term healthcare facilities, rehabilitation centers, convalescent centers, and retirement homes. Exhaust from construction equipment and vehicles would release air pollutants into the atmosphere. The project site is located across the street from Victoria Park, Towne Avenue Elementary School, and residential uses. Additionally, Leapwood Avenue Elementary School is located approximately 0.25 miles from the project site. Therefore, construction and operation of the proposed project may have the potential to expose sensitive receptors to increased pollutant concentrations. Accordingly, this issue will be further analyzed in the EIR.

e) Would the project create objectionable odors affecting a substantial number of people?

Potentially Significant Impact. Odor is the form of air pollution that is possibly the most obvious to the public. Odors can present significant problems for the source and its surrounding community. 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 receiving locations each contribute to the intensity of the impact. Although offensive odors seldom cause physical harm, they can be annoying and cause concern.

Land uses and industrial operations associated with odor complaints include agricultural uses, wastewater treatment plants, food-processing plants, chemical plants, composting facilities, refineries, landfills, and dairies (SCAQMD 1993). The project would entail construction of recreational facilities, specifically tennis courts and soccer fields, and would not result in the creation of a land use that is associated with odors. Potential sources that may emit odors during construction of the proposed project would include diesel equipment, gasoline fumes, and asphalt paving materials. However, odors from these sources generally would be localized, disperse rapidly from the project site and occur at magnitudes that would not affect substantial numbers of people. In addition, the proposed project would use typical construction techniques to reduce odors in compliance with SCAQMD rules. Given the distance to the off-site receptors, nature of the potential odors, and compliance with SCAQMD it is anticipated that the proposed project would not cause an odor nuisance, and odor impacts would be less than significant. However, this issue will be further analyzed in the EIR prepared for the project.

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2.4 Biological Resources

	Potentially Significant Impact	Less Than Significant 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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

- 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?*

Potentially Significant Impact. The project site is located within the northeastern portion of the Victoria Golf Course and over 950 feet north of the Dominguez Channel. Although the recognized open space areas are relatively undeveloped, they are primarily composed of non-native ornamental landscaping with minimal native vegetation remaining; therefore,

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they provide lower-quality habitat to support special-status biological resources. Additionally, urban development, major highways, and light industrial uses to the north, east, south, and west further isolate these areas.³

California Natural Diversity Database (CNDDDB) and California Native Plant Society (CNPS) searches were conducted for the Torrance U.S. Geological Survey 7.5-minute topographic quadrangle and the surrounding quadrangles (Long Beach, San Pedro, Redondo Beach, Venice, Inglewood, and South Gate). The results showed occurrences for a variety of special-status plant and wildlife species. However, the majority of these occurrences are associated with naturalized areas closer to the coast (i.e., Rancho Palos Verdes), located over 9 miles southwest of the project site.

No special-status plant or wildlife species are anticipated to occur within the project site. A biological reconnaissance-level site visit was performed on February 19, 2018, that included a visual survey of the project site plus a 300-foot area from the perimeter of the project site (study area). The majority of the project site is compacted and dominated by ornamental grasses associated with recreational golf and landscaped trees not native to the area, including Bermudagrass (*Cynodon dactylon*), creeping bentgrass (*Agrostis stolonifera*), eucalyptus (*Eucalyptus* spp.), pines (*Pinus* spp.), olive trees (*Olea europaea*), Peruvian peppertree (*Schinus molle*), and Brazilian peppertree (*Schinus terebinthifolius*). Patches of ruderal habitat dominated by non-native forbs and grasses including Russian thistle (*Salsola tragus*), wattle (*Acacia* sp.), cheeseweed (*Malva parviflora*), and red brome (*Bromus madritensis* ssp. *rubens*) were present in small narrow patches throughout the project site. Occasionally, disturbed coastal sage scrub vegetation was associated with portions of these ruderal patches of vegetation identified on site. The disturbed coastal sage scrub vegetation on site was dominated by Russian thistle and wattle, with sparse amounts of California sagebrush (*Artemisia californica*), California brittlebush (*Encelia californica*), and buckwheat (*Eriogonum fasciculatum*) present. The coastal sage scrub vegetation present within the project site is too disturbed and minimal to provide suitable habitat to support special-status plant or wildlife species.

Although it is unlikely that special-status plant and/or wildlife species would occur within the project site, there is a potential that special-status plant and/or wildlife species could occur

³ As described in the City's General Plan EIR (City of Carson 2002), the City of Carson does not have any sensitive or special-status species. According to the Carson General Plan Open Space and Conservation Element, the City's open space areas are composed of Recreational Open Space (i.e., Victoria Golf Course and Dominguez Channel (a concrete-lined flood control channel)), as well as General Open Space (i.e., the Goodyear Blimp Airship Base, drainage courses, and utility transmission corridors).

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within marginal habitat present within the areas immediately west and south of the project site (primarily within the western and southern portions of the Victoria Golf Course). Thus, although the majority of special-status species identified in the CNDDDB and CNPS searches are expected to occur within better-quality habitat closer to the coast, the areas immediately surrounding the project site to the west and south have a high potential to support the CNPS California Rare Plant Rank (CRPR) 1B.1 southern tarplant (*Centromadia parryi* ssp. *australis*), and a moderate potential to support the CRPR 2B.2 mud nama (*Nama stenocarpa*) and the federally listed as threatened and state species of special concern coastal California gnatcatcher (*Polioptila californica californica*).

Southern Tarplant. Southern tarplant is a CRPR 1B.1 species typically found in the margins of marshes and swamps, vernal mesic valley and foothill grassland, and vernal pools. Southern tarplant is an annual herb that typically blooms between May and November. This species has been documented along the banks of the Dominguez Channel approximately 950 feet southwest of the project site. The banks of the Dominguez Branch Channel, a concrete-lined channel that runs along a portion of the western border of the project site, may also provide habitat suitable to support this species. These channels are not expected to be impacted by the proposed project activities. However, potential indirect impacts (i.e., changes in hydrology and generation of fugitive dust and chemical pollutants) may occur; thus, this issue will be further evaluated in the EIR prepared for the proposed project.

Mud Nama. Mud nama is a CRPR 2B.2 species typically found in the margins or marshes and swamps (i.e., lake margins and riverbanks). Mud nama is an annual herb that is typically in bloom between January and July. According to CNDDDB, the closest documented occurrence for this species is in the vicinity of Harbor Lake and the surrounding marsh areas approximately 4.1 miles southwest of the project site (CDFW 2018). This record dates back to 1924 and is the only known source of information for this site. This species has the potential to occur along the banks of the Dominguez Channel, approximately 950 feet southwest of the project site, as well as along the banks of the Dominguez Branch Channel, a concrete-lined channel that runs along a portion of the western border of the project site, based on the presence of suitable riparian habitat. These channels are not expected to be impacted by the proposed project activities. However, potential indirect impacts (i.e., changes in hydrology and generation of fugitive dust and chemical pollutants) may occur. Thus, this issue will be further evaluated in the EIR prepared for the proposed project.

Coastal California Gnatcatcher. Coastal California gnatcatcher is federally listed as threatened and is a CDFW species of special concern (CDFW 2018). This small songbird

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is a year-round resident found below 2,500 feet above mean sea level in Southern California. This subspecies occurs from northwest Baja California, Mexico, to Ventura County, California. The highest densities for coastal California gnatcatcher occur in coastal areas of Orange and San Diego Counties (Mock 2004), with small, disjunct populations documented for Ventura and Los Angeles Counties (Atwood et al. 1998). Coastal California gnatcatchers generally prefer open sage scrub habitats with California sagebrush as a dominant or co-dominant species. Nest placement is typically in areas with less than 40% slope gradient (Mock 2004).

The larger patches of coastal scrub habitat (within areas approximately 20 feet to 500 feet west and approximately 50 feet to 200 feet south of the project site) provide potentially suitable, though marginal, habitat for the species. These areas are fragmented, occurring in small patches throughout the surrounding golf course outside of the project site, particularly in areas west of the Dominguez Branch Channel. ECORP Consulting Inc. (ECORP 2015) conducted focused protocol-level surveys for coastal California gnatcatcher in 2015 (USFWS 1997), with negative findings. Nevertheless, if occupied coastal California gnatcatcher is present within 500 feet of the proposed project, potential indirect effects (i.e., increased noise levels, generation of fugitive dust, and increased human activity) to coastal California gnatcatchers within marginally suitable coastal sage scrub habitat west and south of the project site could occur. Due to potential indirect effects to coastal California gnatcatcher if present on site, the proposed project's effects on special-status species would potentially be significant. As such, this issue will be further evaluated in the EIR prepared for the proposed project.

- 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?*

Potentially Significant Impact. The riparian habitat and wetland known to occur at the lake within the Carson Harbor Village Mobile Home Park (also known as the marsh at Carson Harbor Village) is the only open space area with natural resources to support the preservation of plant and wildlife species, as well as to provide other ecological values and functions.⁴ This habitat is located approximately 0.75 miles north of the project site. Additionally, two drainages are mapped within the general study area, but outside the project site: the concrete-lined Dominguez Channel and the concrete-lined Dominguez Branch Channel (which is a tributary to Dominguez Channel). These channels are both mapped as aquatic resources by the USFWS in the National Wetlands Inventory (USFWS

⁴ City of Carson General Plan (2004) and City of Carson General Plan EIR (2002).

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2018). Dominguez Channel is located more than 950 feet southwest of the project site and is bordered by a fence; therefore, it is not anticipated to be impacted by the proposed project. However, the concrete-lined Dominguez Branch Channel runs along a portion of the western border of the project site, and supports native and non-native riparian vegetation along its bank. The Dominguez Branch Channel conveys water from a marsh located at Carson Harbor Village through a concrete channel to the north (upstream) of the project site to Dominguez Channel at its southern (downstream) extent (south of the project site). Although direct impacts are not expected to occur to Dominguez Branch Channel, indirect impacts (i.e., changes in hydrology and generation of fugitive dust and chemical pollutants) could result.

There is the potential for the project to result in significant impacts from indirect impacts to riparian or other sensitive natural communities. As such, the EIR will evaluate the project's potential impacts on riparian or other sensitive natural communities.

- c) *Would the project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?*

Potentially Significant Impact. There are no wetlands or potentially jurisdictional water features located on the project site. Two drainages occur within the general study area: the concrete-lined Dominguez Channel and the concrete-lined Dominguez Branch Channel, which is a tributary to Dominguez Channel. As previously discussed, the Dominguez Channel is located more than 950 feet southwest of the project site and is bordered by a fence; therefore, it is not anticipated to be impacted by the proposed project. The concrete-lined Dominguez Branch Channel runs along a portion of the western border of the project site. Both channels support native and non-native riparian vegetation along their bank. The Dominguez Branch Channel conveys water from a marsh located at Carson Harbor Village (located approximately 0.75 miles north of the project site) through a concrete channel to the north (upstream) of the project site, and conveys water to Dominguez Channel at its southern (downstream) extent (south of the project site). Although direct impacts are not expected to occur to Dominguez Branch Channel, indirect impacts (i.e., changes in hydrology and generation of fugitive dust and chemical pollutants) could result in potentially significant impacts. As such this issue will be further evaluated in the EIR.

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- 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?*

Potentially Significant Impact. As discussed previously, the project site is located in an urban area and has been used as a public golf course since the late 1960s. The project site is dominated by planted non-native grasses and ornamental trees, and contains limited patches of ruderal habitat with minimal disturbed coastal sage scrub vegetation present among the ruderal habitat. The habitat on site is fragmented, and the golf course is isolated by urban development and major highways on all sides. Overall, the project site supports minimal native habitat and therefore represents lower-quality habitat with limited overall value. The project site does not support wetlands or riparian areas and is not part of a wildlife corridor (South Coast Wildlands 2008; Department of Regional Planning 2014). However, Dominguez Channel (950 feet southwest of the project site) and the Dominguez Branch Channel (which runs along a portion of the western border of the project site) could facilitate wildlife movement through the general area. These channels are not expected to be impacted by the proposed project. Additionally, more common localized wildlife species could use the golf course to move through the area. However, the overall use of this area is not anticipated to change greatly as a result of the proposed project; therefore, the area would continue to facilitate general wildlife movement after project construction. Migratory fish would not be found on site and native resident or migratory wildlife species are not anticipated. The project site does contain mature trees that could be used by migratory or nesting birds (including raptors). The Migratory Bird Treaty Act and California Fish and Game Code Sections 86, 3503, 3503.5, and 3513 would protect migratory and nesting birds from significant impacts resulting from the proposed project. Impacts to migratory or nesting birds could potentially be significant. As such, this issue will be further evaluated in the EIR.

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

Potentially Significant Impact. The project site does not occur within any designated regional habitat linkages or Significant Ecological Areas (SEAs) identified within the Los Angeles County General Plan EIR (2014). The County of Los Angeles Oak Tree Ordinance, codified in Section 22.46.2100 of the Los Angeles County Code of Ordinances (2013), preserves and protects oak trees within the County of Los Angeles. This Ordinance restricts oak tree removal or encroachment within the protected zone without a permit. The protected zone is defined as the area within the drip line of an oak tree, extending from the

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drip line to a point at least 5 feet outside the drip line or 15 feet from the trunk of an oak tree (whichever distance is greater).

Protected oak trees are not anticipated to occur within the project site; however, additional information is needed to determine whether oak trees are present and whether impacts to oak trees could potentially be significant. As such, this issue will be further evaluated in the EIR.

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

No Impact. The project site is not located within an adopted habitat conservation plan or natural community conservation plan (CDFW 2017). Additionally, the project does not conflict with the provisions of the County of Los Angeles General Plan (County of Los Angeles 2015a). As previously discussed, the City’s open space areas are composed of Recreational Open Space, including the County Victoria Golf Course and Dominguez Channel (a concrete-lined flood control channel) (City of Carson 2004). Although the project site occurs within the northeastern portion of the Victoria Golf Course, which is recognized as an open space area, the general use of the area will remain the same (from existing golf course to a new sports recreation and academic resources facility). Additionally, the Dominguez Channel is a fenced concrete-lined flood control channel that is located more than 950 feet southwest of the project site; therefore, the proposed project activities are not anticipated to impact this channel. As such, the proposed project would not conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or state habitat conservation plan. No impact would occur and this issue will not be further evaluated in the EIR prepared for the proposed project.

2.5 Cultural Resources

	Potentially Significant Impact	Less Than Significant 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 as defined in §15064.5?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Disturb any human remains, including those interred outside of dedicated cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

- a) ***Would the project cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?***

Potentially Significant Impact. The Victoria Golf Course opened in approximately 1966 and is therefore more than 45 years old. In order to determine if the proposed project has the potential to impact historical resources under CEQA, the lead agency has a responsibility to record and evaluate the golf course in consideration of California Register of Historical Resources eligibility criteria and integrity requirements (California Public Resources Code, Section 21084.1; 14 CCR 15064.5(3)). The findings of the significance evaluation will reveal whether the proposed project has the potential to impact historical resources under CEQA and will assist in the development of appropriate mitigation measures (if required). As such, the potential for the project to cause a substantial adverse change in the significance of a historical resource will be evaluated in the EIR prepared for the project.

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

Potentially Significant Impact. The proposed project involves the redevelopment of a portion of the existing Victoria Golf Course site with a tennis, soccer, and academic campus. DTSC's 2016 Remedial Action Plan (RAP) for soil and soil gas media requires a three-foot soil cap over the project site. The project involves compaction of the existing soil at the site above the cap followed by import of fill to the site; therefore, it is unlikely that archaeological resources would be encountered.

While it is unlikely that archaeological resources (sites, features, or artifacts) would be exposed during construction activities; further investigation will be undertaken through a California Historical Resources Information System records search and outreach to

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the Native American Heritage Commission for a sacred lands file search and the completion of tribal consultation. The results will be discussed in the EIR prepared for the project.

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

Potentially Significant Impact. The proposed project involves the removal of a portion of the existing Victoria Golf Course and the replacement of the County golf course with a tennis, soccer, and academic campus. DTSC's 2016 RAP for soil and soil gas media requires a three-foot soil cap over the project site. To avoid impacting remedial measures taking place at the site under the RAP, the project involves compaction of the existing soil at the site above the cap followed by import of fill to the site; therefore, it is unlikely that paleontological resources would be encountered.

While it is unlikely that paleontological finds would be encountered, further investigation will be undertaken through a records search conducted by the Natural History Museum of Los Angeles County. The results of these investigations will be discussed in the EIR prepared for the proposed project.

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

Less Than Significant Impact. The proposed project involves the removal of a portion of the existing Victoria Golf Course and the replacement of the golf course with a tennis, soccer, and academic campus. DTSC's 2016 RAP for soil and soil gas media requires a three-foot soil cap over the project site. The project involves compaction of the existing soil at the site above the cap followed by import of fill to the site; therefore, it is unlikely that human remains would be encountered. Nonetheless, in the event that unexpected human remains are encountered, existing regulations through California Health and Safety Code, Section 7050.5 et seq., state that if human remains are discovered during project construction, no further disturbance shall occur until the County Coroner has made the necessary findings as to origin. Further, pursuant to California Public Resources Code, Section 5097.98(b), remains shall be left in place and free from disturbance until a final decision as to the treatment and disposition of the remains has been made. If the County Coroner determines the remains to be Native American, the Native American Heritage Commission shall be contacted within a reasonable time. Subsequently, the Native American Heritage Commission shall identify the most likely descendant. The most likely descendant shall then make recommendations and engage in consultations concerning the

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treatment of the remains as provided in California Public Resources Code, Section 5097.98. Through compliance with existing codes, impacts to resources would be less than significant, and this issue will not be further evaluated in the EIR prepared for the proposed project.

2.6 Geology and Soils

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
VI. GEOLOGY AND SOILS – Would the project:				
a) Expose people or structures to 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.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii) Strong seismic ground shaking?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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a) *Would the project expose people or structures to 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.*

Less Than Significant Impact. The project site is not located within an identified Alquist-Priolo Earthquake Fault Zone. However, the project site is located in the seismically active Southern California region. Structures and people located on the project site do have the potential to be subject to strong seismic ground shaking; however, the site is not identified as being within an Alquist-Priolo Earthquake Fault Zone. As such, impacts would be less than significant, and this issue will not require further analysis in the EIR prepared for the project.

ii) *Strong seismic ground shaking?*

Potentially Significant Impact. The project site is located in the seismically active Southern California region, and the closest fault to the project site is the Avalon–Compton Fault, identified as being within the Newport–Inglewood–Rose Canyon Fault Zone. This fault is located 1.8 miles northwest of the project site. As such, structures and people located on the project site do have the potential to be subject to strong seismic ground shaking. This issue will be further evaluated in the EIR prepared for the project.

iii) *Seismic-related ground failure, including liquefaction?*

Potentially Significant Impact. The project site is located in the seismically active Southern California region and is located within an identified liquefaction zone. As such, structures and people located on the project site do have the potential to be subject to seismic-related ground failure associated with liquefaction. This issue will be further evaluated in the EIR prepared for the project.

iv) *Landslides?*

Less Than Significant Impact. The project site is located within a relatively flat area and is relatively flat itself. As such, given the limited slope of the site and surrounding area, risks to structures and people resulting from landslides are minimal. Impacts would be less than significant, and this issue will not require further analysis in the EIR prepared for the project.

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

Potentially Significant Impact. Implementation of the proposed project would result in substantial earthwork, including compaction and the import of new soil to the site. As such, there is the potential for soil erosion to occur. This impact will be further evaluated in the EIR prepared for the project.

- 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?*

Potentially Significant Impact. The project site is located in the seismically active Southern California region and is located within an identified liquefaction zone. As such, structures and people located on the project site do have the potential to be subject to seismic-related ground failure associated with liquefaction. This issue will be further evaluated in the EIR prepared for the project.

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

Potentially Significant Impact. The project site was historically used as a landfill, and as such, settlement and changes to the soil character of the project site are constantly occurring. Given the nature of the soil at the project site, this issue will require further evaluation in the EIR prepared for the project.

- 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 proposed project would be connected to existing utility systems, including sewer lines. No septic tanks or alternative wastewater disposal systems would be used for the project. Therefore, no impacts would occur, and this issue will not be further analyzed in the EIR prepared for the project.

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2.7 Greenhouse Gas Emissions

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
VII. GREENHOUSE GAS EMISSIONS – Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

Potentially Significant Impact. Greenhouse gas (GHG) emissions would be produced by project-related short-term construction activities as well as by project operations. Construction activities would result in GHG emissions from heavy construction equipment, haul trips of imported soil, truck traffic, and worker trips to and from the project site. Because global climate change is a cumulative impact, the proposed project would have a potential impact through its incremental contribution of GHG emissions combined with the cumulative increase of all other sources of GHG emissions. As such, impacts associated with GHG emissions would be potentially significant. The EIR will analyze GHG emissions and determine whether the proposed project would result in a significant cumulative increase in GHG emissions.

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

Potentially Significant Impact. The South Bay Cities Council of Governments has prepared an Energy Efficiency Climate Action Plan for the City of Carson, and the County has adopted a Community Climate Action Plan, both of which provide objectives and strategies for the City and County to meet their energy and GHG reduction goals. The project has the potential to result in GHG emissions that should be considered in light of the adopted plans for reducing GHG emissions. Further investigation is required to determine whether the proposed project would be consistent with applicable plans, policies, or regulations. Impacts would be potentially significant, and this issue will be further analyzed in the EIR.

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2.8 Hazards and Hazardous Materials

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
VIII. 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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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 for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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

Potentially Significant Impact. The proposed project would be located within what was formerly the BKK Carson landfill, which operated as a Class II landfill from 1948 to 1959. The Carson landfill was permitted to accept inert solid fill, household and commercial

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refuse, garbage, and liquids and semi-liquids. DTSC is overseeing the former landfill's remediation. Remediation activities began at the site in December 2006 and are still ongoing. Further investigation is required to determine whether the proposed project would have the potential to create a hazard to the public or the environment. Impacts would be potentially significant, and this issue will be further analyzed in the EIR.

- 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?***

Potentially Significant Impact. The proposed project would be located within what was formerly the BKK Carson landfill, which operated as a Class II landfill from 1948 to 1959. The site was permitted to accept inert solid fill, household and commercial refuse, garbage, and liquids and semi-liquids. DTSC is overseeing the former landfill's remediation. Remediation activities began at the site in December 2006 and are still ongoing. Further investigation is required to determine whether the proposed project would have the potential to create a hazard to the public or the environment through upset or accident conditions involving the release of hazardous materials into the environment. Impacts would be potentially significant, and this issue will be further analyzed in the EIR.

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

Potentially Significant Impact. The proposed project site is located immediately south of Towne Avenue Elementary School, a Los Angeles Unified School District K-5 school. Additionally, Leapwood Avenue Elementary School, another Los Angeles Unified School District K-5 school, is located approximately 0.25 miles from the project site. As discussed in Subsection 2.8(d), the project site is also included on a list of hazardous materials sites compiled pursuant to California Government Code, Section 65962.5. As such, further investigation is required to determine whether the proposed project would have the potential to create a hazard to the public or the environment. Impacts would be potentially significant, and this issue will be further analyzed in the EIR.

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- 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?*

Potentially Significant Impact. The proposed project is located on a site that is included on a list of hazardous materials sites compiled pursuant to California Government Code, Section 65962.5. As such, further investigation is required to determine whether the proposed project would have the potential to create a hazard to the public or the environment. Impacts would be potentially significant, and this issue will be further analyzed in the EIR.

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

No Impact. The project site is not located within an airport land use plan or within 2 miles of an existing public airport. The closest public airports to the project site are Zamperini Field, approximately 5.4 miles southwest of the project site; Hawthorne Municipal Airport, approximately 6 miles northwest of the project site; and Long Beach Airport, approximately 6.6 miles southeast of the project site. As such, project implementation would not result in a safety hazard for people residing or working in the project area due to proximity to public use airports. No impacts would occur, and this issue will not be further analyzed in the EIR prepared for the project.

- f) *For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?*

Potentially Significant Impact. The project site is located adjacent to, and immediately east of, the Goodyear Blimp Airship Base, a private airbase used solely for the Goodyear Blimp. This airbase has been used by the Goodyear Blimp since January 1968. The project would replace a portion of the existing golf course with new recreational and academic facilities that are similar to the existing recreational use of the site. Replacement of a golf course area with a tennis center, soccer fields, and a building providing academic resources to area youth would introduce additional sources of nighttime lighting as well as more buildings and structures on the project site. As such, the potential safety hazards associated with the project being located adjacent to the Goodyear Blimp Airship Base will be evaluated in the EIR prepared for the project.

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

Less Than Significant Impact. The project site is located southwest of the intersection of Martin Luther King Jr. Street and South Avalon Boulevard, both major thoroughfares in the City of Carson. According to the County of Los Angeles, Department of Public Works (DPW 2018), I-405, located west of the project site, is a primary freeway disaster route, and South Avalon Boulevard, located immediately east of the project site, is designated a secondary disaster route. Disaster routes are freeway, highway, or arterial routes pre-identified for use during times of crisis. These routes are used to bring in emergency personnel, equipment, and supplies to impacted areas in order to save lives, protect property, and minimize impact to the environment. During a disaster, these routes have priority for clearing, repairing, and restoration over all other roads. Implementation of the proposed project would occur on the project site itself, and no roadways would be closed during project construction or operation such that disaster routes would be compromised. As such, impacts would be less than significant, and this issue will not be further evaluated in the EIR prepared for the project.

- h) *Would the project expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?*

Less Than Significant Impact. The project site is located in a developed area of the City of Carson and not close to any wildlands that could be subject to wildfire. North of the project site is Victoria Park, which is a recreational open space with trees. East of the project site is a residential community, south of the project site is commercial development, and west of the project site is undeveloped land and I-405. Although open space with vegetation is located north and west of the project site, risk associated with wildland fires is minimal, and emergency fire service would be readily provided by the County via Martin Luther King Jr. Street and South Avalon Boulevard. As such, risks from wildland fires would be less than significant, and this issue will not be further evaluated in the EIR prepared for the project.

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2.9 Hydrology and Water Quality

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
IX. HYDROLOGY AND WATER QUALITY – Would the project:				
a) Violate any water quality standards or waste discharge requirements?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) 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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) Otherwise substantially degrade water quality?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
j) Inundation by seiche, tsunami, or mudflow?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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- a) *Would the project violate any water quality standards or waste discharge requirements?*

Potentially Significant Impact. The proposed project would be located on a site known to contain hazardous soils and groundwater. Although project construction and operation would comply with all water quality standards and waste discharge requirements, given the nature of the known contamination at the project site, this issue will require further evaluation in the EIR prepared for the project.

- b) *Would the project substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (i.e., the production rate of pre-existing nearby wells would drop to a level that would not support existing land uses or planned uses for which permits have been granted)?*

Potentially Significant Impact. The proposed project would be located on a site known to contain hazardous substances in soils and groundwater associated with its past use as a landfill. DTSC is overseeing the investigation and remediation of site soil and groundwater. Implementation of the proposed project would not draw upon groundwater supplies. However, project implementation would increase the amount of impervious surface at the site, when compared to the existing golf course at the site. Given the nature of the site, the proposed increase in impervious surfaces associated with the project, and the ongoing groundwater investigation and remediation efforts, this issue will require further evaluation in the EIR prepared for the project.

- 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, in a manner which would result in substantial erosion or siltation on- or off-site?*

Potentially Significant Impact. The proposed project would be located on a site known to contain hazardous substances in soils and groundwater associated with its past use as a landfill. Given the soil settlement that occurs at the site, drainage patterns have the potential to shift. Implementation of the proposed project would require site preparation, including compaction and importing of fill to the site, which could result in alteration of existing drainage patterns. As such, this issue will require further evaluation in the EIR prepared for the project.

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- d) *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 substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?*

Potentially Significant Impact. The proposed project would be located on a site known to contain hazardous substances in soils and groundwater associated with its past use as a landfill. Given the soil settlement that occurs at the site, drainage patterns have the potential to shift. Implementation of the proposed project would require site preparation, including compaction and importing of fill to the site, which could result in alteration of existing drainage patterns. As such, this issue will require further evaluation in the EIR prepared for the project.

- e) *Would the project 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?*

Potentially Significant Impact. The proposed project would be located on a site known to contain hazardous substances in soils and groundwater associated with its past use as a landfill. Project implementation would alter existing stormwater drainage patterns. As such, the potential for the project to impact the capacity of existing or planned stormwater drainage system or provide additional sources of polluted runoff will require further evaluation in the EIR prepared for the project.

- f) *Would the project otherwise substantially degrade water quality?*

Potentially Significant Impact. The proposed project would be located on a site known to contain hazardous substances in soils and groundwater associated with its past use as a landfill. Project implementation would alter existing conditions at the project site. As such, the potential for the project to degrade water quality will require further evaluation in the EIR prepared for the project.

- g) *Would the project place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?*

No Impact. The proposed project involves the redevelopment of a portion of the existing Victoria Golf Course to a sports and academic campus with a tennis center, soccer fields, and an academic resources building designed to serve youth in the surrounding community. No housing is proposed as part of this project. As such, the project would not place housing within

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a 100-year flood hazard area, and no impacts would occur. This issue will not require further evaluation in the EIR prepared for the project.

- h) Would the project place within a 100-year flood hazard area structures which would impede or redirect flood flows?*

Potentially Significant Impact. Adjacent to the project site to the west is the Dominguez Branch Channel that is also identified as a 100-year flood hazard area. As such, the potential for structures proposed as part of the project to impede or redirect flood flows will require further evaluation in the EIR prepared for the project.

- i) Would the project expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?*

Potentially Significant Impact. The project site is not located on any California Department of Conservation Tsunami Inundation Maps (DOC 2016). However, west of the project site is Dominguez Channel, the overflow of which would have the potential to result in flooding. As such, the potential for flooding to expose people or structures to significant loss will require further evaluation in the EIR prepared for the project.

- j) Would the project result in inundation by seiche, tsunami, or mudflow?*

Less Than Significant Impact. The tsunami inundation hazard maps, published by the California Department of Conservation, show that the project site is not within a tsunami inundation zone (DOC 2016). Additionally, the project site is located within a primarily flat and urbanized area. As such, the potential for the project to be affected by a seiche from an upstream water source or mudflows is limited. Impacts would be less than significant, and this issue will not be further analyzed in the EIR prepared for the project.

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2.10 Land Use and Planning

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
X. LAND USE AND PLANNING – Would the project:				
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a) *Would the project physically divide an established community?*

No Impact. The project site is currently used as a County golf course and is located south of an existing park and elementary school, west of a residential community, and north of commercial uses. Implementation of the proposed project would convert existing open space recreational golf uses to open space recreational tennis and soccer uses. The site in its current condition serves as a transition between freeway uses to the west, commercial uses to the south, residential uses to the east, and additional recreational and educational uses to the north. Redevelopment of a portion of the County golf course would maintain this transition and would not form any new barriers or divisions. As such, no impacts would occur, and this issue will not be further evaluated in the EIR prepared for the project.

b) *Would the project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?*

No Impact. The project site is currently used as a County golf course and is located within the South Bay Planning Area of the County of Los Angeles General Plan (County of Los Angeles 2015b). Golf courses are considered Special Use Facilities, according to the County General Plan Parks and Recreation Element (County of Los Angeles 2015c). Special Use Facilities are generally single purpose facilities that serve greater regional recreational or cultural needs. There is no size criteria or service radius areas associated with Special Use Facilities.

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The Parks and Recreation Element identifies the following goals related to preserving and enhancing parkland and recreational opportunities throughout the County:

- Goal 1. Enhance active and passive park and recreation opportunities for all users.
- Goal 2. Enhance multi-agency collaboration to leverage resources.
- Goal 3. Acquisition and development of additional parkland.
- Goal 4. Improved accessibility and connectivity to a comprehensive trail system including rivers, greenways, and community linkages.
- Goal 5. Protection of historical and natural resources on County park properties.
- Goal 6. A sustainable parks and recreation system.

Implementation of the proposed project would replace the existing County golf course, an identified Special Use Facility, with a new tennis, soccer and youth resources center. This new use would also be considered a Special Use Facility. Through project implementation, an increased number of individuals would have access to new recreational opportunities associated with tennis and soccer. The project would be directly consistent with Goals 1, 2 and 6 in the Parks and Recreation Element of the County General Plan. As such, use of the site for continued recreational purposes, as proposed, would not conflict with the County's General Plan or goals specific to preserving and enhancing parkland and recreational opportunities. As such, no impacts would occur, and this issue will not be further evaluated in the EIR prepared for the project.

c) ***Would the project conflict with any applicable habitat conservation plan or natural community conservation plan?***

No Impact. The project site is not located within or subject to any habitat conservation plans or natural community conservation plans. The conversion of the existing golf course to soccer fields and tennis courts would not conflict with habitat conservation or natural community conservation plans. No impacts would occur, and this issue will not be further analyzed in the EIR prepared for the project.

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2.11 Mineral Resources

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XI. 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

- 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. The project site is currently used as a portion of a County golf course and is undergoing remediation for historical use as a landfill. No mineral resources are accessible from or produced by the project site. As such, implementation of the proposed project would not result in the loss of availability of a known mineral resource. No impacts would occur, and this issue area will not be further evaluated in the EIR prepared for the project.

- 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. The project site is currently used as a portion of a County golf course and is undergoing remediation for historical use as a landfill. No mineral resources are accessible from or produced by the project site. The project site is not delineated as an important mineral resource recovery site in any land use plans. As such, implementation of the proposed project would not result in the loss of availability of a known mineral resource. No impacts would occur, and this issue area will not be further evaluated in the EIR prepared for the project.

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2.12 Noise

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XII. NOISE – Would the project result in:				
a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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 expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

- a) *Would the project result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?*

Potentially Significant Impact. The proposed project site is bordered by parkland and an elementary school to the north and a residential community to the east. As such, construction activities would potentially expose nearby sensitive receptors to noise levels above established standards. Although construction activity would be temporary, some activities may be audible at nearby noise-sensitive receptors. Because construction activities have the potential to result in noise levels above established standards, impacts would be potentially significant. Operation of the proposed project would increase the intensity of uses at the site with the provision of the tennis center and soccer fields. Impacts

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from operations could result in potentially significant impacts. As such, this issue will be further evaluated in the EIR prepared for the project.

- b) *Would the project result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?*

Potentially Significant Impact. Certain activities during project construction may expose persons to excessive groundborne vibration or noise levels. Although this impact would be temporary, related only to the construction phase of the proposed project, it may still be considered significant. Further evaluation of potentially significant impacts related to groundborne vibration and noise generated by construction activities for the proposed project will be conducted in the EIR prepared for the project.

The operation of the proposed project, specifically use of the tennis courts, soccer fields, and the academic resources building for community youth, would not create any groundborne vibration and noise. Impacts would be less than significant. As such, only groundborne vibration and noise related to construction will be further evaluated in the EIR prepared for the project.

- c) *Would the project result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?*

Potentially Significant Impact. The proposed project involves the replacement of a portion of the existing County Victoria Golf Course with a new sports and academic campus consisting of tennis facilities, soccer fields, and a building housing academic support services for community youth. Construction activities would generate temporary increases in ambient noise levels. Once in operation, the project does have the potential to result in permanent increases in ambient noise levels due to the extended hours of use. Nighttime lighting would allow the facility to be used well beyond sunset. As such, project operations could create a permanent increase in ambient noise levels; therefore, this issue will be further analyzed in the EIR prepared for the project.

- d) *Would the project result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?*

Potentially Significant Impact. The proposed project site is bordered by parkland and an elementary school to the north and a residential community to the east. As such, construction activities could result in substantial temporary or periodic increases in ambient noise levels in the project vicinity. Additionally, during project operations, there is the

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potential that use of soccer fields and the tennis center would have the potential to result in noise level increases due to potential increased use of the site. Further analysis will be required in the project EIR to determine the potential for noise impacts associated with project construction and operation.

- e) *Would the project be 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 expose people residing or working in the project area to excessive noise levels?*

No Impact. The proposed project is not located within an airport land use plan or within a 2-mile radius of any public airport or public use airport. No impact would occur, and this issue will not be further analyzed in the EIR prepared for the project.

- f) *Would the project be within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?*

Less Than Significant Impact. The project site is located immediately east of the Goodyear Blimp Airship Base, a private airbase used solely for the Goodyear Blimp. This airbase has been used by the Goodyear Blimp since January 1968 and has not posed a safety or hazard risk to golfers at the Victoria Golf Course. The project would replace the existing golf course with new recreational and academic facilities that are similar to the existing recreational use of the site. Noise associated with the Goodyear Blimp operations is solely related to blimp departures and arrivals, and due to the nature of the motors used in the blimp, such noise is minimal. As with current operations, recreational uses would be located adjacent to the airship base, and these would not expose people in the project area to excessive noise levels. Impacts would be less than significant, and this issue will not be further analyzed in the EIR prepared for the project.

2.13 Population and Housing

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XIII. POPULATION AND HOUSING – Would the project:				
a) Induce substantial 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)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

- a) *Would the project induce substantial 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 proposed project involves the removal of the northeastern 87 acres of the existing County Victoria Golf Course and replacing it with a tennis, soccer, and academic campus designed to serve youth in the City of Carson, South Los Angeles and the greater Los Angeles area. No new homes would be constructed as a part of this project, nor would the project result in substantial increases in employment at the project site or within the City of Carson. Additionally, implementation of the proposed project would not require installation of new roadways, public services, or utilities; the site is currently served by existing roadways, utilities, and services, and these services would be maintained as part of the proposed project. Therefore, implementation of the proposed project would not induce growth, and impacts would be less than significant; therefore, this issue will not require further analysis in the EIR prepared for the project.

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

No Impact. Implementation of the proposed project would result in the removal of the northeastern 87 acres of the existing County Victoria Golf Course and the construction of a new tennis, soccer, and academic campus. No housing is currently located on the project site, and project implementation would not require demolition of existing housing or construction of new housing. As such, no impacts to housing would occur, and this issue will not require further evaluation in the EIR prepared for the project.

- c) *Would the project displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?*

No Impact. Implementation of the proposed project would result in the removal of the northeastern 87 acres of the existing County Victoria Golf Course and the construction of a new tennis, soccer, and academic campus. No housing is currently located on the project site,

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and project implementation would not displace any individuals such that construction of new housing would be required. No displacement impacts would occur, and this issue will not require further evaluation in the EIR prepared for the project.

2.14 Public Services

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XIV. 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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Police protection?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

- 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?

Potentially Significant Impact. Fire protection is provided to the project site by the County of Los Angeles. Implementation of the proposed project would introduce more intensive uses to the project site such that an increase in the demand for fire protection services could occur. As such, impacts would be potentially significant, and this issue area will be evaluated further in the EIR prepared for the project.

Police protection?

Potentially Significant Impact. Police protection is provided to the project site by the County Sheriff's Department. Implementation of the proposed project would introduce more intensive uses to the project site such that an increase in the demand for police

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protection services could occur. As such, impacts would be potentially significant, and this issue area will be evaluated further in the EIR prepared for the project.

Schools?

Less Than Significant Impact. Schools located in the City of Carson are part of the Los Angeles Unified School District. The proposed project would replace the northeastern 87 acres of the existing County Victoria Golf Course with a recreational sports and academic campus. Implementation of the project would not result in increased demand for schools or require the construction of new schools. The project is intended to serve the existing community and would not result in population growth such that new schools would be required. As such, impacts would be less than significant, and this issue area will not be further evaluated in the EIR prepared for the project.

Parks?

Less Than Significant Impact. The proposed project would replace the northeastern 87 acres of the existing County Victoria Golf Course with a recreational sports and academic campus. Per the County's General Plan Parks and Recreation Element, the existing golf course is considered a Special Use Facility. The proposed project would replace this Special Use Facility with a new Special Use Facility. Implementation of the project would not result in increased demand for parks or require the construction of new parks associated with an increased demand. The project is intended to serve the existing community and would not result in population growth such that new parks would be required. As such, impacts would be less than significant, and this issue area will not be further evaluated in the EIR prepared for the project.

Other public facilities?

Less Than Significant Impact. The proposed project would replace the northeastern 87 acres of the existing County Victoria Golf Course with a recreational sports and academic campus. Implementation of the project would not result in increased demand for libraries or other public facilities such that the construction of new facilities associated with increased demand would be required. The project is intended to serve the existing community and would not result in population growth such that new libraries or other public facilities would be required. As such, impacts would be less than significant, and this issue area will not be further evaluated in the EIR prepared for the project.

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2.15 Recreation

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XV. 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

Less Than Significant Impact. The proposed project would be located on a portion of the existing County Victoria Golf Course. Immediately north of the project site is Victoria Park. The recreational and academic uses associated with the proposed project are designed to serve youth in the community. By attracting more youth to the project site, the project does have the potential to attract more users to recreational uses in the project vicinity, especially to Victoria Park, north of the project site. However, the recreational uses proposed as part of this project would complement the recreational use of Victoria Park and would provide increased recreational opportunities. As such, project implementation would not result in increased use such that deterioration of existing recreational facilities would occur. Impacts would be less than significant, and this issue will not require further evaluation in the EIR prepared for the project.

- 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?*

Potentially Significant Impact. The proposed project involves the construction of a new recreational facility with a tennis center, soccer fields, and an academic resources center. As discussed in this Initial Study, there is a potential for construction and/or operation of the proposed project to result in impacts to the environment. An EIR will be prepared addressing all potentially significant impacts identified in this Initial Study. Separate

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technical analyses and chapters focused specifically on the potentially significant impacts will be included in the EIR.

2.16 Transportation and Traffic

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XVI. TRANSPORTATION/TRAFFIC – Would the project:				
a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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- a) *Would the project conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?*

Potentially Significant Impact. The proposed project involves the replacement of the northeastern 87 acres of the existing County Victoria Golf Course with a sports and academic campus. Construction would result in construction employee trips as well as truck trips to haul imported soil to the project site. Although construction conditions would be temporary, occurring only during the time needed for construction of the proposed facilities, they may cause an increase in traffic that would be substantial in relation to the existing traffic load and capacity of the street system. During project operations, there is also a chance that more trips would be generated by the project site than the existing trips generated by the golf course. As such, further evaluation of potentially significant impacts related to traffic generated by the proposed project will be included in the EIR prepared for the project.

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

Potentially Significant Impact. Construction of the proposed project would require grading and import of soil to level the project site, thereby generating a potentially significant number of haul truck trips. Although impacts would be temporary and related only to the construction phase of the proposed project, construction traffic may exceed level of service standards established by the County congestion management agency for designated roads or highways. During project operation, there is also a chance that more trips would be generated by the project site than the existing trips generated by the golf course. As such, further evaluation of potentially significant impacts related to traffic generated by the proposed project will be conducted in the EIR prepared for the project.

- c) *Would the project result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?*

Potentially Significant Impact. The project site is located adjacent to, and immediately east of, the Goodyear Blimp Airship Base, a private airbase used solely for the Goodyear

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Blimp. This airbase has been used by the Goodyear Blimp since January 1968. The project would replace a portion of the existing County golf course with new recreational and academic facilities that are similar to the existing recreational use of the site. Replacement of a golf course area with a tennis center, soccer fields, and a building providing academic resources to area youth would introduce additional sources of nighttime lighting as well as more buildings and structures on the project site. As such, the potential safety hazards associated with the project being located adjacent to the Goodyear Blimp Airship Base will be evaluated in the EIR prepared for the project.

- d) *Would the project substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?*

Potentially Significant Impact. The proposed project would convert the northeastern 87 acres of the existing County Victoria Golf Course to a sports center with tennis and soccer facilities as well as an academic resources building. The project site is located along two major thoroughfares: Martin Luther King Jr. Street to the north, and South Avalon Boulevard to the east. Across the street from the project site to the north are Victoria Park and Towne Avenue Elementary School. East of the project site is a residential community. Given that the proposed project is designed to serve youth within the community and that the project site is located along busy roadways, pedestrian safety for individuals accessing the site will be considered and evaluated in the EIR prepared for the project.

- e) *Would the project result in inadequate emergency access?*

Less Than Significant Impact. Emergency access to the project site would be available via Martin Luther King Jr. Street to the north and South Avalon Boulevard to the east. Project construction and operational activities would occur entirely on the project site and would not obstruct any roadways or affect emergency access. Impacts would be less than significant, and this issue will not be evaluated in the EIR prepared for the project.

- f) *Would the project conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?*

Less Than Significant Impact. The proposed project would convert the northeastern 87 acres of the existing Victoria Golf Course to a sports center with tennis and soccer facilities as well as an academic resources building. The project site is located along two major thoroughfares: Martin Luther King Jr. Street to the north, and South Avalon Boulevard to the east. According to the County of Los Angeles Bicycle Master Plan (2012), South

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Avalon Boulevard includes dedicated Class II bicycle lanes in both the northbound and southbound directions. A Class I Bike Path is also located northwest of the project site, terminating at Martin Luther King Jr. Street. Additionally, public transportation is provided along South Avalon Boulevard via Long Beach Transit Line 1 and Los Angeles County Metropolitan Transportation Authority Line 205 and Line 246. The proposed project would not alter the Class II bicycle lanes along South Avalon Boulevard or the transit service provided by Long Beach Transit and the County Metropolitan Transportation Authority. As such, project implementation would not conflict with adopted policies, plans, or programs regarding alternative forms of transportation, and impacts would be less than significant. Therefore, this issue will not be further evaluated in the EIR prepared for the project.

2.17 Tribal Cultural Resources

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XVII. TRIBAL CULTURAL RESOURCES				
a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
i) 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	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

Potentially Significant Impact. As the lead agency for this project, the County is initiating tribal consultation in compliance with Assembly Bill 52. Given the anticipated project construction activities, the potential for encountering resources is low. Nonetheless, consultations will be undertaken, and the outcome of the consultations will determine whether the project has the potential to cause a substantial adverse change to the significance of a tribal cultural resource. This issue area will be evaluated further in the EIR prepared for the project.

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

Potentially Significant Impact. As the lead agency for this project, the County is initiating tribal consultation in compliance with Assembly Bill 52. Given the anticipated project construction, the potential for encountering resources is low. Nonetheless, consultations will be undertaken, and the outcome of the consultations will determine whether the project has the potential to cause a substantial adverse change to the significance of a tribal cultural resource. This issue area will be evaluated further in the EIR prepared for the project.

2.18 Utilities and Service Systems

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XVIII. UTILITIES AND SERVICE SYSTEMS – Would the project:				
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) 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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
g) Comply with federal, state, and local statutes and regulations related to solid waste?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

a) *Would the project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?*

Potentially Significant Impact. Wastewater from the project site would drain to existing sewer connections and drainage facilities in the vicinity of the site. The potential for flows to exceed requirements from the Los Angeles Regional Water Quality Control Board will be evaluated in the EIR prepared for the project.

b) *Would the project require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?*

Potentially Significant Impact. Water would be provided to the project site via existing water conveyance pipelines, and wastewater from the project site would drain to existing sewer connections and drainage facilities in the vicinity of the site. The EIR prepared for the project will include an evaluation of whether the project could be supplied entirely by the existing water and wastewater treatment facilities.

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- c) *Would the project require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?*

Potentially Significant Impact. Stormwater from the project site would drain to existing drainage facilities in the vicinity of the site. The EIR prepared for the project will include an evaluation of whether flows could be accommodated by the existing facilities.

- d) *Would the project have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?*

Potentially Significant Impact. Water would be provided to the project site via existing water conveyance pipelines. The EIR prepared for the project will include an evaluation of whether adequate water supplies would be available to serve the project.

- e) *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?*

Potentially Significant Impact. Wastewater would be conveyed from the project site for treatment off site at an existing wastewater treatment facility. The EIR prepared for the project will include an evaluation of whether adequate capacity exists to provide wastewater treatment for wastewater generated by the project.

- f) *Would the project be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?*

Potentially Significant Impact. Solid waste would be conveyed from the project site and disposed at an existing landfill. The EIR prepared for the project will include an evaluation of whether adequate landfill capacity exists to provide solid waste disposal services for solid waste generated by the project.

- g) *Would the project comply with federal, state, and local statutes and regulations related to solid waste?*

Potentially Significant Impact. The EIR prepared for the project will include a discussion of how the proposed project would comply with all federal, state, and local statutes and regulations related to solid waste.

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2.19 Mandatory Findings of Significance

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XIX. MANDATORY FINDINGS OF SIGNIFICANCE				
a) Does the project have the potential to 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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- a) *Does the project have the potential to 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?*

Potentially Significant Impact. The existing Victoria Golf Course was constructed in 1966, and as such, the project has the potential to result in an adverse change to a potential historical resource. As the lead agency for this project, the County is initiating tribal consultation in compliance with Assembly Bill 52. The outcome of the consultations will determine whether the project has the potential to cause a substantial adverse change to the significance of a tribal cultural resource. As such, these two issues will be evaluated in the EIR prepared for the proposed project.

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- 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)?*

Potentially Significant Impact. The proposed project may have impacts that have been identified in the Initial Study as individually limited but that may be cumulatively considerable, depending on other current or probable future projects in the vicinity. The EIR prepared for the project will evaluate potential project-related cumulative impacts, including the neighboring project proposed by Plenitude.

As discussed in Section 2.3, Air Quality, the proposed project could contribute to a cumulatively considerable net increase in criteria air pollutants for which the SCAB has been designated non-attainment. The production of GHG emissions related to project construction may result in cumulative impacts that may contribute to global change. Cumulative traffic impacts could also occur during project construction. These impacts are potentially significant and will be further discussed in the EIR prepared for the proposed project.

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

Potentially Significant Impact. As discussed previously, environmental effects that would cause substantial adverse effects on human beings, either directly or indirectly, may occur from implementation of the proposed project. Further evaluation of potentially significant impacts relative to aesthetics, air quality, biological resources, cultural resources, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, noise, public services, recreation, transportation and traffic, tribal cultural resources, and utilities and service systems will be conducted in the EIR prepared for the proposed project.

Initial Study Checklist
Carol Kimmelman Sports and Academic Campus

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Initial Study Checklist

Carol Kimmelman Sports and Academic Campus

3 REFERENCES AND PREPARERS

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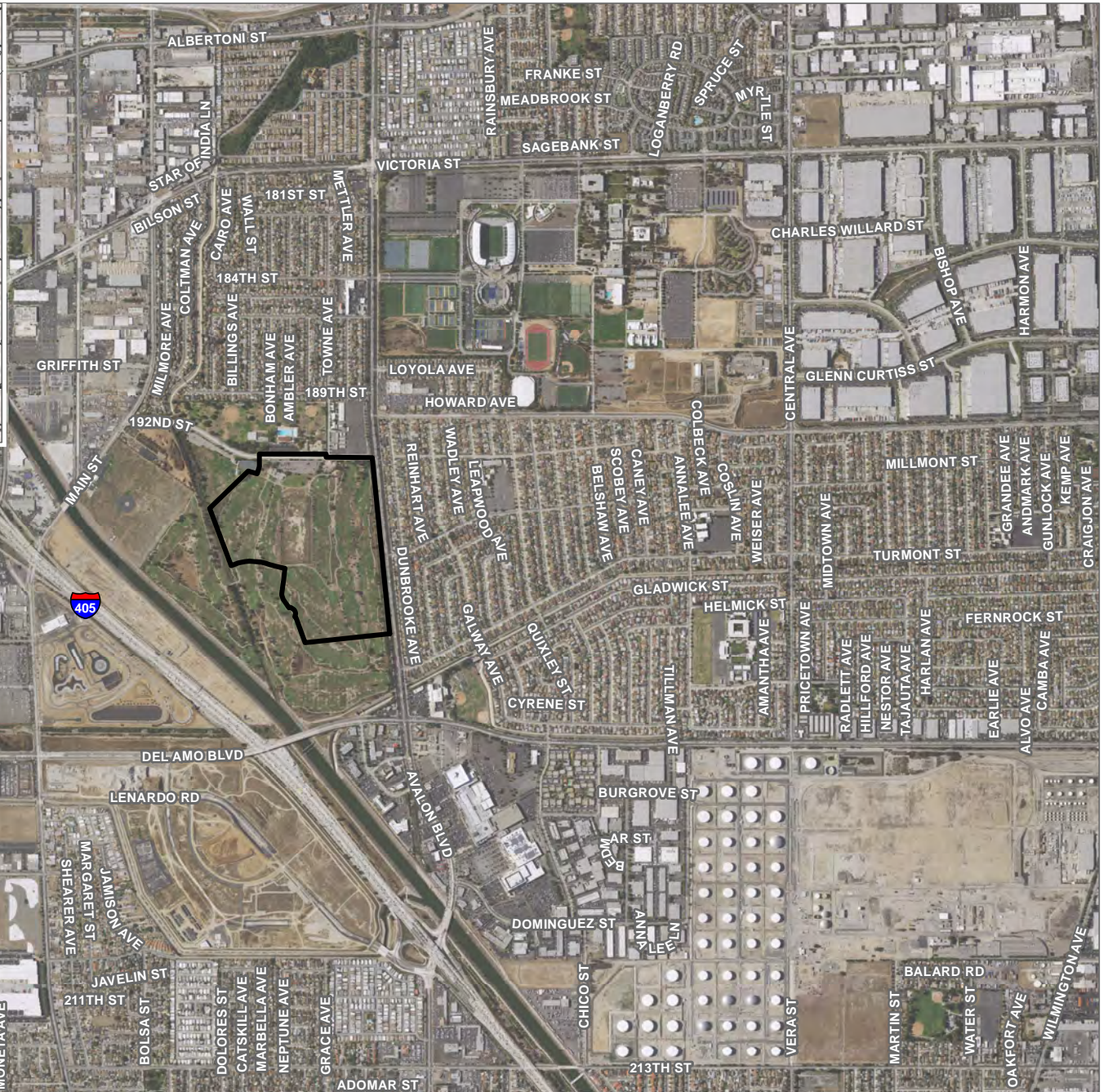
3.2 List of Preparers

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Devin Brookhart, Publications Specialist Lead
Kara Murphy, Publications Specialist
Curtis Battle, GIS and Graphics

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SOURCE: NAIP 2016

DUDEK



FIGURE 1-1

Project Location

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SOURCE: MEIS, 2018

FIGURE 1-2

Site Plan

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SOURCE: MEIS, 2017

FIGURE 2-1

Tennis Complex

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SOURCE: MEIS, 2017

FIGURE 2-2

Soccer Fields

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2

Carol Kimmelman Sports and Academic Campus Project EIR - Scoping Meeting
 August 14, 2018

County of Los Angeles

Name	Affiliation	Address	City, State, Zip Code	Email*	Add me to the mailing list?
1. JESSICA ARTHUR CLUJANS	Resident	7660 E. Cushman St	Carson, CA 90746	jacqueline.clujans@gmail.com	Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>
2. ARTHUR CLUJANS	Resident	701 Loyola Ave.	Carson, CA 90746	arthur2922@comcast.net	Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>
3. SANDRA REWIS	Resident	942 E. Turmont St	Carson, CA 90746		Yes: <input type="checkbox"/> No: <input checked="" type="checkbox"/>
4. DARRIN HARRIS	Resident	14102 Leeward Ave	Carson, CA 90746	darrinh@stglobe.net	Yes: <input type="checkbox"/> No: <input type="checkbox"/>
5. DARRIN HARRIS	Resident	12824 Rhusbury Ave	Carson, CA 90746		Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>
6. MAYRA COREAS	Resident	18702 Wall Street	Carson, CA 90746	coreas-mayra@yahoo.com	Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>
7. LESLEY KARINA THOMPSON	Resident	659 Loyola Ave	Carson, CA 90746	letsos@jesiebay.net	Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>
8. TOMMY ALICE HARRIS	Resident	19416 Galway Ave.	Carson, CA 90746	charkarakl@att.com	Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>
9. HANNA WILLIAMS	"	20113 Belshaw Ave	"	harrishw@ymail.com	Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>
10. AL SUMPTER	Res.	1542 E Abbott St	Carson 90746	alsumpter@yahoo.com	Yes: <input type="checkbox"/> No: <input type="checkbox"/>
11. JESSICA REWIS	Resident	15802 Grandview Pl.	Carson 90746	Mercedes@jhr	Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>
12. M.A. DUPRE	Resident	20009 Reinhardt Ave	Carson, CA 90746		Yes: <input type="checkbox"/> No: <input type="checkbox"/>
13. NATHANIEL BROWN	Resident	17402 Belshaw Ave	Carson 90746	NATE.BROWN.1740@Yahoo.com	Yes: <input type="checkbox"/> No: <input type="checkbox"/>
14. DENNIS PETERSON	"	943 W. Carson St Torrance	Torrance 90502	dpeteca@hotmail.com	Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>

*Note: Official notices will be sent via United States Postal Service.

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August 14, 2018

County of Los Angeles

	Name	Affiliation	Address	City, State, Zip Code	Email*	Add me to the mailing list?
15.	REGINA BRYANT	USACE	319 E. 158 ST	CARLETON CA 90248		Yes: <input type="checkbox"/> No: <input checked="" type="checkbox"/>
16.	Lisa Bullock	neighbor	19021 Burbank	Carson 90746	lshelton@csbcglobal.net	Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>
17.	Edna Al-Obaidy	city of Carson				Yes: <input type="checkbox"/> No: <input type="checkbox"/>
18.	Lee Cornelius	Resident	738 Trawcut SE	CARSON		Yes: <input type="checkbox"/> No: <input type="checkbox"/>
19.	MARDA DOMINGUS	Resident	738 Trawcut SE	CARSON		Yes: <input type="checkbox"/> No: <input type="checkbox"/>
20.	Raymond Lampert	Resident	19921 DunBrook Ave	Carson		Yes: <input type="checkbox"/> No: <input type="checkbox"/>
21.						Yes: <input type="checkbox"/> No: <input type="checkbox"/>
22.						Yes: <input type="checkbox"/> No: <input type="checkbox"/>
23.						Yes: <input type="checkbox"/> No: <input type="checkbox"/>
24.						Yes: <input type="checkbox"/> No: <input type="checkbox"/>
25.						Yes: <input type="checkbox"/> No: <input type="checkbox"/>
26.						Yes: <input type="checkbox"/> No: <input type="checkbox"/>
27.						Yes: <input type="checkbox"/> No: <input type="checkbox"/>
28.						Yes: <input type="checkbox"/> No: <input type="checkbox"/>

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	Name	Affiliation	Address	City, State, Zip Code	Email*	Add me to the mailing list?
29.	GORRUE Todd	VICTORIA WOOD	1908 FIRME ST	Compton CA 9022	LTodd.FAMU11@Com	Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>
30.	GIL SMYTH	FORMER MAYOR	18802 PEPPERDALE DR.	CARSON, CA 90746		Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>
31.	Wine Goshi	Victorice	28010 1st Rushmore Rd Kendal Palisades 90225	RPLV, CA 90225	Winegoshi@cox.net	Yes: <input type="checkbox"/> No: <input type="checkbox"/>
32.	DEREK MOODY	RESIDENT	787 E Holborn Drive	Carson, CA 90746	MrDerek88@gmail.com	Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>
33.	Daisy Valdez	resident	18703 Bonham Ave.	carson, CA 90746		Yes: <input type="checkbox"/> No: <input type="checkbox"/>
34.	Starline Smith	resident	18802 Pepperdale Dr	Carson 90746	ssmith@carsonmed.org	Yes: <input type="checkbox"/> No: <input type="checkbox"/>
35.						Yes: <input type="checkbox"/> No: <input type="checkbox"/>
36.						Yes: <input type="checkbox"/> No: <input type="checkbox"/>
37.						Yes: <input type="checkbox"/> No: <input type="checkbox"/>
38.						Yes: <input type="checkbox"/> No: <input type="checkbox"/>
39.						Yes: <input type="checkbox"/> No: <input type="checkbox"/>
40.						Yes: <input type="checkbox"/> No: <input type="checkbox"/>
41.						Yes: <input type="checkbox"/> No: <input type="checkbox"/>
42.						Yes: <input type="checkbox"/> No: <input type="checkbox"/>

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August 14, 2018

County of Los Angeles

	Name	Affiliation	Address	City, State, Zip Code	Email*	Add me to the mailing list?
43.	Charlette Brimmer	Homeowner Association	President	Carson	pls100@aol.com	Yes: <input type="checkbox"/> No: <input type="checkbox"/>
44.	Mokona Alexander				MalAlexander@CarsonCA.org	Yes: <input type="checkbox"/> No: <input type="checkbox"/>
45.						Yes: <input type="checkbox"/> No: <input type="checkbox"/>
46.						Yes: <input type="checkbox"/> No: <input type="checkbox"/>
47.						Yes: <input type="checkbox"/> No: <input type="checkbox"/>
48.						Yes: <input type="checkbox"/> No: <input type="checkbox"/>
49.						Yes: <input type="checkbox"/> No: <input type="checkbox"/>
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55.						Yes: <input type="checkbox"/> No: <input type="checkbox"/>
56.						Yes: <input type="checkbox"/> No: <input type="checkbox"/>

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Carol Kimmelman Sports and Academic Campus Project EIR - Scoping Meeting
August 14, 2018

County of Los Angeles

	Name	Affiliation	Address	City, State, Zip Code	Email*	Add me to the mailing list?
57.	Karen Vernon		18806 S. Towne Ave	Carson, CA 90746		Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>
58.	Andres Cruz		503 E. 105 th St	Carson, CA 90746		Yes: <input type="checkbox"/> No: <input type="checkbox"/>
59.	PAUL HAWKINS		18818 Towne Ave	CARSON 90746		Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>
60.	Lois Skoobert		18909 Milwaukee Ave	Carson 90746	Lois.Skoobert@yahoo.com	Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>
61.	Maurin Blatia		701 E Carson St	Carson, Ca 90745		Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>
62.	Paul Trister					Yes: <input type="checkbox"/> No: <input type="checkbox"/>
63.	Maria Corea	Res.	18702 Wall St	Carson CA 90746	corea-maria@yahoo.com	Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>
64.	Carolina Hernandez		330 189 St	CARSON	CALIF	Yes: <input type="checkbox"/> No: <input type="checkbox"/>
65.						Yes: <input type="checkbox"/> No: <input type="checkbox"/>
66.						Yes: <input type="checkbox"/> No: <input type="checkbox"/>
67.						Yes: <input type="checkbox"/> No: <input type="checkbox"/>
68.						Yes: <input type="checkbox"/> No: <input type="checkbox"/>
69.						Yes: <input type="checkbox"/> No: <input type="checkbox"/>
70.						Yes: <input type="checkbox"/> No: <input type="checkbox"/>

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NATIVE AMERICAN HERITAGE COMMISSION

Cultural and Environmental Department
1550 Harbor Blvd., Suite 100
West Sacramento, CA 95691
Phone (916) 373-3710



August 8, 2018

Ryan Kristan
Los Angeles County
500 West Temple Street
Los Angeles, CA 90012

Also sent via e-mail: rkristan@dpw.lacounty.gov

RE: SCH# 2018071074, Carol Kimmelman Sports and Academic Campus Project, City of Carson; Los Angeles County, California

Dear Mr. Kristan:

The Native American Heritage Commission has received the Notice of Preparation (NOP) for Draft Environmental Impact Report for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code § 21000 et seq.), specifically Public Resources Code section 21084.1, states that a project that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit. 14, § 15064.5 (b) (CEQA Guidelines Section 15064.5 (b)). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an environmental impact report (EIR) shall be prepared. (Pub. Resources Code § 21080 (d); Cal. Code Regs., tit. 14, § 15064 subd. (a)(1) (CEQA Guidelines § 15064 (a)(1)). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources with the area of project effect (APE).

CEQA was amended significantly in 2014. Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a separate category of cultural resources, "tribal cultural resources" (Pub. Resources Code § 21074) and provides that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment (Pub. Resources Code § 21084.2). Please reference California Natural Resources Agency (2016) "Final Text for tribal cultural resources update to Appendix G: Environmental Checklist Form," <http://resources.ca.gov/ceqa/docs/ab52/Clean-final-AB-52-App-G-text-Submitted.pdf>. Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code § 21084.3 (a)). **AB 52 applies to any project for which a notice of preparation or a notice of negative declaration or mitigated negative declaration is filed on or after July 1, 2015.** If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). **Both SB 18 and AB 52 have tribal consultation requirements.** If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (154 U.S.C. 300101, 36 C.F.R. § 800 et seq.) may also apply.

The NAHC recommends **lead agencies consult with all California Native American tribes** that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments. **Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.**

AB 52

AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

1. Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project: Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a **lead agency** shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:
 - a. A brief description of the project.
 - b. The lead agency contact information.
 - c. Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code § 21080.3.1 (d)).
 - d. A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code § 21073).
2. Begin Consultation Within 30 Days of Receiving a Tribe's Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report: A **lead agency** shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code § 21080.3.1, subds. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or environmental impact report. (Pub. Resources Code § 21080.3.1(b)).
 - a. For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code § 65352.4 (SB 18). (Pub. Resources Code § 21080.3.1 (b)).
3. Mandatory Topics of Consultation If Requested by a Tribe: The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:
 - a. Alternatives to the project.
 - b. Recommended mitigation measures.
 - c. Significant effects. (Pub. Resources Code § 21080.3.2 (a)).
4. Discretionary Topics of Consultation: The following topics are discretionary topics of consultation:
 - a. Type of environmental review necessary.
 - b. Significance of the tribal cultural resources.
 - c. Significance of the project's impacts on tribal cultural resources.
 - d. If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code § 21080.3.2 (a)).
5. Confidentiality of Information Submitted by a Tribe During the Environmental Review Process: With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code sections 6254 (r) and 6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code § 21082.3 (c)(1)).
6. Discussion of Impacts to Tribal Cultural Resources in the Environmental Document: If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:
 - a. Whether the proposed project has a significant impact on an identified tribal cultural resource.
 - b. Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code section 21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code § 21082.3 (b)).

7. Conclusion of Consultation: Consultation with a tribe shall be considered concluded when either of the following occurs:
 - a. The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
 - b. A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code § 21080.3.2 (b)).

8. Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document: Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code section 21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code section 21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code § 21082.3 (a)).

9. Required Consideration of Feasible Mitigation: If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code section 21084.3 (b). (Pub. Resources Code § 21082.3 (e)).

10. Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:
 - a. Avoidance and preservation of the resources in place, including, but not limited to:
 - i. Planning and construction to avoid the resources and protect the cultural and natural context.
 - ii. Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
 - b. Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
 - i. Protecting the cultural character and integrity of the resource.
 - ii. Protecting the traditional use of the resource.
 - iii. Protecting the confidentiality of the resource.
 - c. Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
 - d. Protecting the resource. (Pub. Resource Code § 21084.3 (b)).
 - e. Please note that a federally recognized California Native American tribe or a nonfederally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code § 815.3 (c)).
 - f. Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code § 5097.991).

11. Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource: An environmental impact report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:
 - a. The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code sections 21080.3.1 and 21080.3.2 and concluded pursuant to Public Resources Code section 21080.3.2.
 - b. The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.
 - c. The lead agency provided notice of the project to the tribe in compliance with Public Resources Code section 21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code § 21082.3 (d)).

This process should be documented in the Cultural Resources section of your environmental document.

The NAHC's PowerPoint presentation titled, "Tribal Consultation Under AB 52: Requirements and Best Practices" may be found online at: http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf

SB 18

SB 18 applies to local governments and requires **local governments** to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code § 65352.3). Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf

Some of SB 18's provisions include:

1. **Tribal Consultation**: If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.** (Gov. Code § 65352.3 (a)(2)).
2. **No Statutory Time Limit on SB 18 Tribal Consultation**. There is no statutory time limit on SB 18 tribal consultation.
3. **Confidentiality**: Consistent with the guidelines developed and adopted by the Office of Planning and Research pursuant to Gov. Code section 65040.2, the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code sections 5097.9 and 5097.993 that are within the city's or county's jurisdiction. (Gov. Code § 65352.3 (b)).
4. **Conclusion of SB 18 Tribal Consultation**: Consultation should be concluded at the point in which:
 - a. The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
 - b. Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation. (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. For that reason, we urge you to continue to request Native American Tribal Contact Lists and "Sacred Lands File" searches from the NAHC. The request forms can be found online at: <http://nahc.ca.gov/resources/forms/>

NAHC Recommendations for Cultural Resources Assessments

To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions:

1. Contact the appropriate regional California Historical Research Information System (CHRIS) Center (http://ohp.parks.ca.gov/?page_id=1068) for an archaeological records search. The records search will determine:
 - a. If part or all of the APE has been previously surveyed for cultural resources.
 - b. If any known cultural resources have been already been recorded on or adjacent to the APE.
 - c. If the probability is low, moderate, or high that cultural resources are located in the APE.
 - d. If a survey is required to determine whether previously unrecorded cultural resources are present.
2. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
 - a. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.

Nicole Cobleigh

From: Ryan Kristan (Consultant) <rkristan@dpw.lacounty.gov>
Sent: Tuesday, September 4, 2018 8:34 AM
To: Derek.Galey@lw.com; Nicole Cobleigh
Subject: FW: Carol Kimmelman Sports and Academic Campus - Caltrans' comments
Attachments: Carol Kimmelman Campus - CT comments.pdf

Derek and Nicole,

Comments on Kimmelman project attached.

Ryan Kristan, Architect
Project Manager
Los Angeles County Public Works
Office (626) 300-3271
Cell (213) 840-7004

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From: Sheikh, Shabnam@DOT <Shabnam.Sheikh@dot.ca.gov>
Sent: Thursday, August 30, 2018 10:02 AM
To: Ryan Kristan (Consultant) <rkristan@dpw.lacounty.gov>
Cc: state.clearinghouse@opr.ca.gov
Subject: Carol Kimmelman Sports and Academic Campus - Caltrans' comments

Good morning Mr. Kristan,

Attached, please find Caltrans' comments on the NOP for Carol Kimmelman Sports and Academic Campus (SCH#2018071074). The original document has been sent to the Lead Agency on 8/30/18.

Thanks,
Shabnam Sheikh
District 7 | Division of Planning - IGR
California Department of Transportation

DEPARTMENT OF TRANSPORTATION

DISTRICT 7
100 S. MAIN STREET, MS 16
LOS ANGELES, CA 90012
PHONE (213) 897-8391
FAX (213) 897-1337
TTY 711
www.dot.ca.gov



*Making Conservation
a California Way of Life.*

August 30, 2018

Mr. Ryan Kristan
County of Los Angeles Department of Public Works
Project Management Division II
900 South Fremont Avenue, 5th Floor
Alhambra, CA 91803

RE: Carol Kimmelman Sports and Academic
Campus
NOP of Draft Environmental Impact Report
GTS # 07-LA-2018-01803
SCH # 2018071074
Vic. LA: 405, 110

Dear Mr. Kristan:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The proposed project involves the development of the Carol Kimmelman Sports and Academic Campus including a tennis center and soccer center for underserved youth as well as programs for adults.

After reviewing the Notice of Preparation, Caltrans concurs with the initial study determination that the proposed project may have significant environmental impacts and traffic analysis is requested for Route 110.

1. The Traffic Impact Study Report to be prepared should include queues analysis and recommend mitigations at the following locations:
 - NB-110 and SB-110 Off-ramp to Del Amo Blvd/Hamilton Ave.
 - SB-110 Off-ramp to Carson St.
 - NB-110 Off-ramp to 220th St./Figueroa St.
 - SB-110 Off-ramp to 190th St.
2. Please consider appropriate multimodal mitigation measures for this project. Caltrans suggest improving safety for bicyclists, pedestrians, transit users, and motorists by upgrading and installing ADA curb ramps at the most feasible locations near on and off ramps in the vicinity of the project.

Mr. Ryan Kristan
August 30, 2018
Page 2 of 2

Storm water run-off is a sensitive issue for Los Angeles and Ventura counties. Please be mindful that project needs to be designed to discharge clean run-off water. If you have any questions, please feel free to contact the project coordinator, Shabnam Sheikh, shabnam.sheikh@dot.ca.gov, and refer to GTS #07-LA-2018-01803.

Sincerely,



MIYA EDMONSON
IGR/CEQA Branch Chief

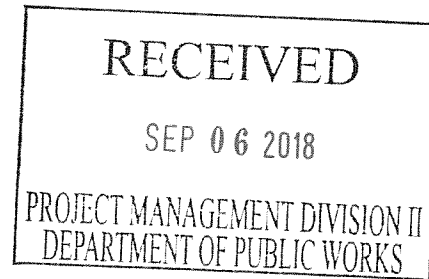
cc: Scott Morgan, State Clearinghouse

DEPARTMENT OF TRANSPORTATION

DISTRICT 7
100 S. MAIN STREET, MS 16
LOS ANGELES, CA 90012
PHONE (213) 897-8391
FAX (213) 897-1337
TTY 711
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August 30, 2018

Mr. Ryan Kristan
County of Los Angeles Department of Public Works
Project Management Division II
900 South Fremont Avenue, 5th Floor
Alhambra, CA 91803

RE: Carol Kimmelman Sports and Academic
Campus
NOP of Draft Environmental Impact Report
GTS # 07-LA-2018-01803
SCH # 2018071074
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Mr. Ryan Kristan
August 30, 2018
Page 2 of 2

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Sincerely,

A handwritten signature in black ink, appearing to read 'Miya Edmonson', with a long horizontal flourish extending to the right.

MIYA EDMONSON
IGR/CEQA Branch Chief

cc: Scott Morgan, State Clearinghouse



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA USPS AND E-MAIL:

rkristan@dpw.lacounty.gov

Ryan Kristan

County of Los Angeles Department of Public Works

Project Management Division II

900 South Fremont Avenue, 5th Floor

Alhambra, California 91803

RECEIVED

SEP 10 2018

PROJECT MANAGEMENT DIVISION II
DEPARTMENT OF PUBLIC WORKS

August 22, 2018

Notice of Preparation of a Draft Environmental Impact Report for The Carol Kimmelman Center, LLC Project

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. SCAQMD staff's comments are recommendations regarding the analysis of potential air quality impacts from the Proposed Project that should be included in the Draft Environmental Impact Report (EIR). Please send SCAQMD a copy of the Draft EIR upon its completion. Note that copies of the Draft EIR that are submitted to the State Clearinghouse are not forwarded to SCAQMD. Please forward a copy of the Draft EIR directly to SCAQMD at the address shown in the letterhead. **In addition, please send with the Draft EIR all appendices or technical documents related to the air quality, health risk, and greenhouse gas analyses and electronic versions of all air quality modeling and health risk assessment files¹. These include emission calculation spreadsheets and modeling input and output files (not PDF files). Without all files and supporting documentation, SCAQMD staff will be unable to complete our review of the air quality analyses in a timely manner. Any delays in providing all supporting documentation will require additional time for review beyond the end of the comment period.**

Air Quality Analysis

The SCAQMD adopted its California Environmental Quality Act (CEQA) Air Quality Handbook in 1993 to assist other public agencies with the preparation of air quality analyses. The SCAQMD staff recommends that the Lead Agency use this Handbook as guidance when preparing its air quality analyses. Copies of the Handbook are available from the SCAQMD's Subscription Services Department by calling (909) 396-3720. More recent guidance developed since this Handbook was published is also available on SCAQMD's website at: [http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-\(1993\)](http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-(1993)). The SCAQMD staff also recommends that the Lead Agency use the CalEEMod land use emissions software. This software has recently been updated to incorporate up-to-date state and locally approved emission factors and methodologies for estimating pollutant emissions from typical land use development. CalEEMod is the only software model maintained by the California Air Pollution Control Officers Association (CAPCOA) and replaces the now outdated URBEMIS. This model is available free of charge at: www.caleemod.com.

On March 3, 2017, the SCAQMD's Governing Board adopted the 2016 Air Quality Management Plan (2016 AQMP), which was later approved by the California Air Resources Board on March 23, 2017.

¹ Pursuant to the CEQA Guidelines Section 15174, the information contained in an EIR shall include summarized technical data, maps, plot plans, diagrams, and similar relevant information sufficient to permit full assessment of significant environmental impacts by reviewing agencies and members of the public. Placement of highly technical and specialized analysis and data in the body of an EIR should be avoided through inclusion of supporting information and analyses as appendices to the main body of the EIR. Appendices to the EIR may be prepared in volumes separate from the basic EIR document, but shall be readily available for public examination and shall be submitted to all clearinghouses which assist in public review.

Built upon the progress in implementing the 2007 and 2012 AQMPs, the 2016 AQMP provides a regional perspective on air quality and the challenges facing the South Coast Air Basin. The most significant air quality challenge in the Basin is to achieve an additional 45 percent reduction in nitrogen oxide (NO_x) emissions in 2023 and an additional 55 percent NO_x reduction beyond 2031 levels for ozone attainment. The 2016 AQMP is available on SCAQMD's website at: <http://www.aqmd.gov/home/library/clean-air-plans/air-quality-mgt-plan>.

SCAQMD staff recognizes that there are many factors Lead Agencies must consider when making local planning and land use decisions. To facilitate stronger collaboration between Lead Agencies and the SCAQMD to reduce community exposure to source-specific and cumulative air pollution impacts, the SCAQMD adopted the Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning in 2005. This Guidance Document provides suggested policies that local governments can use in their General Plans or through local planning to prevent or reduce potential air pollution impacts and protect public health. SCAQMD staff recommends that the Lead Agency review this Guidance Document as a tool when making local planning and land use decisions. This Guidance Document is available on SCAQMD's website at: <http://www.aqmd.gov/docs/default-source/planning/air-quality-guidance/complete-guidance-document.pdf>. Additional guidance on siting incompatible land uses (such as placing homes near freeways or other polluting sources) can be found in the California Air Resources Board's *Air Quality and Land Use Handbook: A Community Health Perspective*, which can be found at: <http://www.arb.ca.gov/ch/handbook.pdf>. Guidance² on strategies to reduce air pollution exposure near high-volume roadways can be found at: https://www.arb.ca.gov/ch/rd_technical_advisory_final.PDF.

The SCAQMD has also developed both regional and localized significance thresholds. SCAQMD staff requests that the Lead Agency compare the emission results to the recommended regional significance thresholds found here: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf>. In addition to analyzing regional air quality impacts, SCAQMD staff recommends calculating localized air quality impacts and comparing the results to localized significance thresholds (LSTs). LSTs can be used in addition to the recommended regional significance thresholds as a second indication of air quality impacts when preparing a CEQA document. Therefore, when preparing the air quality analysis for the Proposed Project, it is recommended that the Lead Agency perform a localized analysis by either using the LSTs developed by the SCAQMD or performing dispersion modeling as necessary. Guidance for performing a localized air quality analysis can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>.

When specific development is reasonably foreseeable as result of the goals, policies, and guidelines in the Proposed Project, the Lead Agency should identify any potential adverse air quality impacts and sources of air pollution that could occur using its best efforts to find out and a good-faith effort at full disclosure in the Draft EIR. The degree of specificity will correspond to the degree of specificity involved in the underlying activity which is described in the Draft EIR (CEQA Guidelines Section 15146). When quantifying air quality emissions, emissions from both construction (including demolition, if any) and operations should be calculated. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips). Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers),

² In April 2017, CARB published a technical advisory, *Strategies to Reduce Air Pollution Exposure Near High-Volume Roadways: Technical Advisory*, to supplement CARB's *Air Quality and Land Use Handbook: A Community Health Perspective*. This technical advisory is intended to provide information on strategies to reduce exposures to traffic emissions near high-volume roadways to assist land use planning and decision-making in order to protect public health and promote equity and environmental justice. The technical advisory is available at: <https://www.arb.ca.gov/ch/landuse.htm>.

area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality impacts from indirect sources, such as sources that generate or attract vehicular trips, should be included in the analysis. Furthermore, for phased projects where there will be an overlap between construction and operation, the air quality impacts from the overlap should be combined and compared to SCAQMD's regional air quality CEQA operational thresholds to determine significance.

The Lead Agency should identify any potential adverse air quality impacts that could occur from all phases of the Proposed Project and all air pollutant sources related to the Proposed Project. Air quality impacts from both construction (including demolition, if any) and operations should be calculated. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips). Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality impacts from indirect sources, such as sources that generate or attract vehicular trips, should be included in the analysis.

Mitigation Measures

In the event that the Proposed Project generates significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized during project construction and operation to minimize or eliminate these impacts. Pursuant to CEQA Guidelines Section 15126.4 (a)(1)(D), any impacts resulting from mitigation measures must also be discussed. Several resources are available to assist the Lead Agency with identifying possible mitigation measures for the Proposed Project, including:

- Chapter 11- Mitigating the Impact of a Project, of the SCAQMD *CEQA Air Quality Handbook*
- SCAQMD's CEQA web pages available here: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mitigation-measures-and-control-efficiencies>
- SCAQMD's Rule 403 – Fugitive Dust, and the Implementation Handbook for controlling construction-related emissions and Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities
- SCAG's MMRP for the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy available here: http://scagtrpsecs.net/Documents/2016/peir/final/2016fP_EIR_ExhibitB_MMRP.pdf
- CAPCOA's *Quantifying Greenhouse Gas Mitigation Measures* available here: <http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>

Alternatives

In the event that the Proposed Project generates significant adverse air quality impacts, CEQA requires the consideration and discussion of alternatives to the project or its location which are capable of avoiding or substantially lessening any of the significant effects of the project. The discussion of a reasonable range of potentially feasible alternatives, including a "no project" alternative, is intended to foster informed decision-making and public participation. Pursuant to CEQA Guidelines Section 15126.6(d), the Draft EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the Proposed Project.

Permits

In the event that the Proposed Project requires a permit from SCAQMD, SCAQMD should be identified as a responsible agency for the Proposed Project. For more information on permits, please visit

SCAQMD webpage at: <http://www.aqmd.gov/home/permits>. Questions on permits can be directed to SCAQMD's Engineering and Permitting staff at (909) 396-3385.

Data Sources

SCAQMD rules and relevant air quality reports and data are available by calling the SCAQMD's Public Information Center at (909) 396-2039. Much of the information available through the Public Information Center is also available via the SCAQMD's webpage (<http://www.aqmd.gov>).

The SCAQMD staff is available to work with the Lead Agency to ensure that project air quality and health risk impacts are accurately evaluated and mitigated where feasible. Please contact Robert Dalbeck, Assistant Air Quality Specialist, at rdalbeck@aqmd.gov, if you have any questions regarding these comments.

Sincerely,

Daniel Garcia

Daniel Garcia
Program Supervisor, CEQA IGR
Planning, Rule Development & Area Sources

DG/RD
RVC180801-15
Control Number



South Coast Air Quality Management District

Headquarters

21865 Copley Drive Diamond Bar CA 91765-4178

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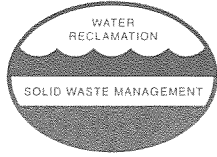


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COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY

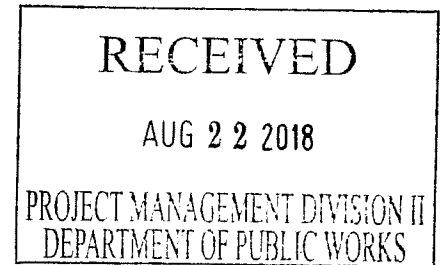
1955 Workman Mill Road, Whittier, CA 90601-1400
Mailing Address: P.O. Box 4998, Whittier, CA 90607-4998
Telephone: (562) 699-7411, FAX: (562) 699-5422
www.lacsd.org

GRACE ROBINSON HYDE
Chief Engineer and General Manager

August 20, 2018

Ref. Doc. No.: 4669704

Mr. Ryan Kristan
Department of Public Works
Project Management Division II
County of Los Angeles
900 South Freemont Avenue
5th Floor
Alhambra, CA 91803



Dear Mr. Kristan:

NOP Response for The Carol Kimmelman Sports and Academic Campus

The Sanitation Districts of Los Angeles County (Districts) received a Notice of Preparation of a Draft Environmental Impact Report (NOP) for the subject project on August 1, 2018. The proposed project is located within the jurisdictional boundaries of District No. 8. We offer the following comments regarding sewerage service:

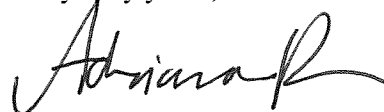
1. The wastewater flow originating from the proposed project will discharge to a local sewer line, which is not maintained by the Districts, for conveyance to the Districts' Del Amo Trunk Sewer, located in Avalon Boulevard at Del Amo Boulevard. The Districts' 24-inch diameter trunk sewer has a capacity of 3.7 million gallons per day (mgd) and conveyed a peak flow of 2.4 mgd when last measured in 2015.
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 produces an average flow of 2015 mgd.
3. In order to estimate the volume of wastewater the project will generate, go to www.lacsd.org, Wastewater & Sewer Systems, click on Will Serve Program, and click on the [Table 1, Loadings for Each Class of Land Use](#) link for a copy of the Districts' average wastewater generation factors.
4. The Districts are empowered by the California Health and Safety Code to charge a fee for the privilege of connecting (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 to accommodate the proposed project. Payment of a connection fee will be required before a permit to connect to the sewer is issued. For more information and a copy of the Connection Fee Information Sheet, go to www.lacsd.org.

Wastewater & Sewer Systems, click on Will Serve Program, and search for the appropriate link. In determining the impact to the Sewerage System and applicable connection fees, the Districts' Chief Engineer and General Manager will determine the user category (e.g. Condominium, Single Family home, etc.) that best represents the actual or anticipated use of the parcel or facilities on the parcel. For more specific information regarding the connection fee application procedure and fees, please contact the Connection Fee Counter at (562) 908-4288, extension 2727.

5. 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 you that the Districts intend to provide this service up to the levels that are legally permitted and to inform you of the currently existing capacity and any proposed expansion of the Districts' facilities.

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

Very truly yours,



Adriana Raza
Customer Service Specialist
Facilities Planning Department

AR:ar

Los Angeles Unified School District

Office of Environmental Health and Safety

AUSTIN BEUTNER
Superintendent of Schools

DIANE PAPPAS
Chief Executive Officer, District Operations & Digital Innovations

CARLOS A. TORRES
Acting Director, Environmental Health and Safety

8/22/18

Ryan Kristan
County of Los Angeles Department of Public Works
Project Management Division II
900 South Fremont Ave, 5th Floor
Alhambra, CA 91803

SUBJECT: PROJECT NAME: Carol Kimmelman Sports and Academic Campus
PROJECT LOCATION: 340 Martin Luther King Jr. Street, Carson, CA 90746

Presented below are comments submitted on behalf of the Los Angeles Unified School District (LAUSD) regarding the Notice of Preparation for the subject project. Due to the fact that Towne Avenue Elementary School is located immediately north of the proposed project site, LAUSD is concerned about the potential negative impacts of the project to our students, staff and parents traveling to and from the referenced campus.

Based on the extent/location of the proposed development, it is our opinion that significant environmental impacts on the surrounding community (air quality, noise, traffic, pedestrian safety, etc.) will occur. Since the project will have a significant impact on LAUSD schools, mitigation measures designed to help reduce or eliminate such impacts are included in this response.

Air Quality

District students and school staff should be considered sensitive receptors to air pollution impacts. Construction activities for the proposed project would result in short term impacts on ambient air quality in the area resulting from equipment emissions and fugitive dust. To ensure that effective mitigation is applied to reduce construction air pollutant impacts on the school, we ask that the following language be included as a mitigation measure for air quality impacts:

- If the proposed mitigation measures do not reduce air quality impacts to a level of insignificance, the project applicant shall develop new and appropriate measures to effectively mitigate construction related air emissions at the affected school. Provisions shall be made to allow the school and or designated representative(s) to notify the project applicant when such measures are warranted.

Noise

Noise created by construction activities may affect the school in proximity to the proposed project site. These construction activities include grading, earth moving, hauling, and use of heavy equipment. The California Environmental Quality Act requires that such impacts be quantified, and eliminated or reduced to a level of insignificance.

LAUSD established maximum allowable noise levels to protect students and staff from noise impacts generated in terms of Leq. These standards were established based on regulations set forth by the California Department of Transportation and the City of Los Angeles. LAUSD's exterior noise standard is 67 dBA Leq and the interior noise standard is 45 dBA Leq. A noise level increase of 3 dBA or more over ambient noise levels is considered significant for existing schools and would require mitigation to achieve levels

within 2 dBA of pre-project ambient level. To ensure that effective mitigations are employed to reduce construction related noise impacts on District sites, we ask that the following language be included in the mitigation measures for noise impacts:

- If the proposed mitigation measures do not reduce noise impacts to a level of insignificance, the project applicant shall develop new and appropriate measures to effectively mitigate construction related noise at the affected school. Provisions shall be made to allow the school and or designated representative(s) to notify the project applicant when such measures are warranted.

Traffic/Transportation

LAUSD's Transportation Branch **must be contacted** at (213) 580-2950 regarding the potential impact upon existing school bus routes. The Project Manager or designee will have to notify the LAUSD Transportation Branch of the expected start and ending dates for various portions of the project that may affect traffic within nearby school areas. To ensure that effective mitigations are employed to reduce construction and operation related transportation impacts on District sites, we ask that the following language be included in the mitigation measures for traffic impacts:

- School buses must have unrestricted access to schools.
- During the construction phase, truck traffic and construction vehicles may not cause traffic delays for our transported students.
- During and after construction changed traffic patterns, lane adjustment, traffic light patterns, and altered bus stops may not affect school buses' on-time performance and passenger safety.
- Construction trucks and other vehicles are required to stop when encountering school buses using red-flashing-lights must-stop-indicators per the California Vehicle Code.
- Contractors must install and maintain appropriate traffic controls (signs and signals) to ensure vehicular safety.
- Contractors must maintain ongoing communication with LAUSD school administrators, providing sufficient notice to forewarn children and parents when existing vehicle routes to school may be impacted.
- Parents dropping off their children must have access to the passenger loading areas.

Pedestrian Safety

Construction activities that include street closures, the presence of heavy equipment and increased truck trips to haul materials on and off the project site can lead to safety hazards for people walking in the vicinity of the construction site. To ensure that effective mitigations are employed to reduce construction and operation related pedestrian safety impacts on District sites, we ask that the following language be included in the mitigation measures for pedestrian safety impacts:

- Contractors must maintain ongoing communication with LAUSD school administrators, providing sufficient notice to forewarn children and parents when existing pedestrian routes to school may be impacted.
- Contractors must maintain safe and convenient pedestrian routes to all nearby schools. The District will provide School Pedestrian Route Maps upon your request.

- Contractors must install and maintain appropriate traffic controls (signs and signals) to ensure pedestrian and vehicular safety.
- Haul routes are not to pass by any school, except when school is not in session.
- No staging or parking of construction-related vehicles, including worker-transport vehicles, will occur on or adjacent to a school property.
- Funding for crossing guards at the contractor's expense is required when safety of children may be compromised by construction-related activities at impacted school crossings.
- Barriers and/or fencing must be installed to secure construction equipment and to minimize trespassing, vandalism, short-cut attractions, and attractive nuisances.
- Contractors are required to provide security patrols (at their expense) to minimize trespassing, vandalism, and short-cut attractions.

The District's charge is to protect the health and safety of students and staff, and the integrity of the learning environment. The comments presented above identify potential environmental impacts related to the proposed project that must be addressed to ensure the welfare of the students attending Towne Avenue Elementary School, their teachers and the staff, as well as to assuage the concerns of the parents of these students. Therefore, the measures set forth in these comments should be adopted as conditions of project approval to offset unmitigated impacts on the affected school students and staff.

Thank you for your attention to this matter. If you need additional information please contact me at (213) 241-4674.

Regards,

Cinah Daqiq
Environmental Specialist/Research Associate

Nicole Cobleigh

From: Ryan Kristan (Consultant) <rkristan@dpw.lacounty.gov>
Sent: Tuesday, September 4, 2018 8:08 AM
To: Derek.Galey@lw.com; Nicole Cobleigh
Subject: FW: Carol Kimmelman Sports and Academic Campus Project: Initial Study Comments
Attachments: KRISTAN 8-31-18_001.pdf

Derek and Nicole,

Please see attached.

Ryan Kristan, Architect
Project Manager
Los Angeles County Public Works
Office (626) 300-3271
Cell (213) 840-7004

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From: Danny Aleshire <danny.aleshire@awattorneys.com>
Sent: Friday, August 31, 2018 4:53 PM
To: Ryan Kristan (Consultant) <rkristan@dpw.lacounty.gov>
Cc: Sunny Soltani <ssoltani@awattorneys.com>; Danny Aleshire <danny.aleshire@awattorneys.com>; snaaseh@carson.ca.us; 'Kenneth C. Farfsing' <kfarfsing@carson.ca.us>; 'John Raymond' <jraymond@carson.ca.us>; Danielle Griffith <DGriffith@esassoc.com>; Heidi Rous <HRous@esassoc.com>
Subject: Carol Kimmelman Sports and Academic Campus Project: Initial Study Comments

Hi Ryan,

Please see attached for a comment letter sent on behalf of the City of Carson regarding the Initial Study and NOP that were released last month for the Kimmelman Project on the Victoria Golf Course Site.

Best Regards,

Danny Aleshire | Associate
Aleshire & Wynder, LLP | 2361 Rosecrans Ave., Suite 475, El Segundo, CA 90245
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August 31, 2018

VIA U.S. MAIL AND E-MAIL

Ryan Kristan
County of Los Angeles
Department of Public Works
Project Management Division II
900 South Fremont Avenue, 5th Floor
Alhambra, California 91803
Email: rkristan@dpw.lacounty.gov

Re: **Carol Kimmelman Sports and Academic Campus Project: Initial Study
Comments**

Dear Mr. Kristan:

This firm represents the City of Carson ("City") as its City Attorney. On behalf of the City, we thank you for the opportunity to comment on the Initial Study issued by the County of Los Angeles ("County") for the above-referenced project (the "Project"), located at 340 Martin Luther King, Jr. Street, City of Carson, CA ("Project Site"). As the Project is located within the City's jurisdiction, it is a responsible agency under CEQA (Public Resources Code § 21000 *et seq.*, "CEQA") and as outlined below, since this is a private project initiated and carried out by The Carol Kimmelman Center, LLC ("Kimmelman"), the City will have discretionary authority over the permits and entitlements required for the Project. Without waiving the legal position¹ of our client that the City must be designated as the "lead agency" for the purposes of environmental review under CEQA for the Project, we write to provide comments on your legally deficient Notice of Preparation ("NOP") and Initial Study for the Project, each dated July 31, 2018.

While the City understands that there are a number of potential benefits associated with the Project, the City remains concerned that substantial impacts to the citizens of Carson posed by the Project are not being adequately presented nor analyzed under the Initial Study and will be inappropriately addressed in the Draft EIR for the Project. Similarly, those impacts are not targeted for potential mitigation or improvements that could reduce the effects endured by the community as a result of the Project. As such, the City has the following comments and questions in response to the NOP and Initial Study:

¹ The City hereby incorporates its legal and factual positions as set forth in letters dated May 11, 2018 and June 27, 2018 to the County ("Letters") into this comment letter.

I. GENERAL PROJECT COMMENTS

A. Improper "Piecemealing" of the Redevelopment of the Victoria Golf Course Site

The existing Victoria Golf Course site ("VGC Site") consists of approximately 187 acres, with the development of a single use (a golf course) and is proposed to be redeveloped with the Project as well as the project known as The Creek at Dominguez Hills Project proposed by Plenitude Holdings (the "Plenitude Project") for which an Initial Study was separately released earlier this week. The environmental impacts imposed by the Project cannot be properly analyzed or assessed without reference to, and consideration of, the concurrent development of Plenitude Project and the environmental impacts that may result from the redevelopment of the entirety of the VGC Site, rather than separate analysis of each of the project. Such separate analysis is expressly prohibited under the CEQA Guidelines, as CEQA forbids "piecemealing" projects. Pursuant to CEQA, the whole of the entire project must be analyzed and those environmental considerations related to project(s) broken down into little projects, thus reducing or minimizing the potential impacts to the environment through "piecemeal" is prohibited. Potential growth impacts, such as new development projects, cannot be deferred to be analyzed in a piecemeal fashion at a later time. Rather, "the need for regional environmental consideration [must be made] at the earliest stage of a planned development before it gains irreversible momentum." (*Bozung v. Local Agency Formation Commission of Ventura County* (1975) 13 Cal. 3d 263, 284, fn. 28.) Moreover, CEQA Guidelines 15378(c) and (d) provide:

"(c) The term 'project' refers to the activity which is being approved and which may be subject to several discretionary approvals by governmental agencies. The term 'project' does not mean each separate governmental approval.

(d) Where the lead agency could describe the project as either the adoption of a particular regulation under subdivision (a)(1) or as a development proposal which will be subject to several governmental approvals under subdivisions (a)(2) or (a)(3), the lead agency shall describe the project as the development proposal for the purpose of environmental analysis."

The Project and the Plenitude Project together will collectively result in the concurrent redevelopment of the VGC Site and as a result, must be analyzed simultaneously under one EIR. An agency cannot treat one integrated large project as a succession of smaller projects to avoid analyzing the environmental impacts of the whole project. (*See, CASDBA v. County of Inyo* (1985) 172 Cal. App. 3d 151, 165-166 [two separate "packages" of entitlements for one project, each analyzed in a separate Negative Declaration, improper].) Instead, the County is "piecemealing" its environmental analysis in a manner that makes it incapable of appropriate analysis of the potential for environmental impacts. Thus, both projects must be analyzed together, pursuant to CEQA, not as separate CEQA documents.

B. Land Use and Planning Impacts

We are perplexed by the County's determination that there is no potential for any impacts under the Land Use and Planning environmental factors requiring study under CEQA and that such factors do not need to be addressed (and do not require any further study) under the Draft EIR for the Project. This is patently untrue for a number of reasons. First, the Project's proposed uses are inconsistent with the City's General Plan Land Use Element and zoning designation for the Project Site, which is Open Space ("OS"). The OS designation allows for outdoor recreational uses such as those proposed by the Project, however, if the fields, tennis courts, and other facilities and buildings are privately-owned or contain educational uses not incidental to outdoor recreation, they will require discretionary approval of a Conditional Use Permit (CUP) from the City. Moreover, under the City's Municipal Code, the Project will require a CUP for developing on a former landfill (Carson Municipal Code ("CMC"), Section 9151.12) and Design Overlay Review (CMC, Section 9172.23). Second, the Project Site is not classified under the County's General Plan Land Use Map or Zoning Map for any particular use because it is located within an incorporated area, in the City's jurisdiction. Therefore, it cannot be found to be either consistent or inconsistent with the County's land use plan for the Project Site. While it is referenced as a property owned by the County as a park/golf/open space site under the Community, Neighborhood and Pocket Park Service Radius Map (Figure 10.3 of the County's General Plan), such areas are required to be used for open space uses. Thus, the indoor private educational facilities and administrative center proposed by the Project would be inconsistent with the open space uses allowed on the Project Site. Finally, on page 1 of the Initial Study, the Project Site's General Plan land use designation is listed as Recreational Open Space under the City's General Plan and its Zoning classification is listed as being designated OS-Organic Refuse Landfill under the CMC, however, the narrative analysis under the Initial Study (rationalizing the County's conclusion that no further analysis under the Land Use and Planning factors under CEQA) fails to make reference to the City's General Plan land use and zoning classifications for the Project Site nor analyze the Project's consistency with the City's land use plans and policies pertaining to the Project Site.

The County has previously indicated to the City, in its responses to our Letters, that its position is that the Project is exempt from the City's local building and zoning regulations based on the fact that the Project Site is owned by the County (which is leased to Kimmelman), and that the County is entitled to intergovernmental immunity from the City's building and zoning regulations. However, since the Project is a private, rather than a public project, the doctrine of intergovernmental immunity is inapplicable. Under the California Code of Regulations, Section 15377, "[a] 'private project' means a project which will be carried out by a person other than a governmental agency, but the project will need a discretionary approval from one or more governmental agencies..." Clearly, this Project falls within this definition as it is initiated by a private, non-governmental entity, and will be carried out, financed, and developed by a private entity, and the Project improvements themselves, including all structures and facilities developed for the Project will be presumably owned by Kimmelman, not the County. The County's role is

simply as the underlying fee title owner, with no further involvement. Moreover, the underlying purpose of the Project is for private development, as it will be privately operated (by the U.S. Tennis Association ("USTA"), the Tiger Woods Foundation and potentially other private associations/operators) primarily for the benefit of their members and participants. The County is therefore inappropriately seeking to transfer its governmental immunity under Section 53090 of the California Government Code to Kimmelman in order to enable the Project to be free of the City's building and zoning regulations. Such contravention of the City's police powers is inappropriate under state law as set forth in various California Appellate Court cases, including *Board of Trustees v. City of Los Angeles* (1975) 49 Cal. App. 3d 45 (*Board of Trustees*)², and *Attard v. Board of Supervisors of Contra Costa County* (2017) 14 Cal. App. 5th 1066, *Bame v. City of Del Mar* (2001) 14 Cal. App. 4th 1346, and also in 85 Op. Att'y Gen. 207 (1985), and 4 Rathkopf, *The Law of Zoning and Planning*, Section 53.04.

As a result, development of the Project, even if located on County-owned land, falls squarely within Carson's land use and permitting authority. Therefore, the Draft EIR must study the Project's consistency with the City's General Plan, Municipal Code, and its other policies and regulations applicable to the Project and the Project Site.

The City is vitally interested, among other issues identified in this comment letter, in making certain the EIR fully and adequately assesses the environmental impacts posed by the Project, including the potential to result in numerous conflicts and inconsistencies with the City's land use and zoning plans and policies, which ensure the health, safety, and welfare of its residents.

II. SPECIFIC PROJECT COMMENTS³

Project Description

1. The Project Description requires substantial revision to provide greater detail and definition in order to allow for sufficient analysis of the potential for environmental impacts of the Project. For example, the Project Description must explain how the courts, fields, and facilities will be used, operated (and by whom, including the USTA, Tiger Woods Foundation and others), and programmed (by the USTA, the Tiger Woods Foundation and others). In addition, the type of events, number of events, and duration

² In this case, the court held that a private party's operation of a circus is not insulated from local regulation merely because the circus will be conducted on property leased from a state university. (*Board of Trustees*, at pp. 49-50.)

³ Please note that the list of comments and questions in this section is intended to include the typical items we expect to see, and are generally addressed, in an EIR along with comments and questions for the County regarding the Project for the County to address with City staff in upcoming meetings regarding the Project and the Plenitude Project.

of events should be explained in detail. If any regional tennis or soccer or other events that will draw large crowds are expected, please describe and analyze the public safety and public works impacts they may impose on the City and what form of reimbursement or compensation will be provided to the City for such event costs. Separately, the Sports Facilities Advisory's ("SFA") analysis and recommendations should be utilized to finalize the Project Description.

2. Please provide the anticipated hours of operation for the proposed Project. Specifically, it would be helpful to understand the planned operation of each component of the Project, such as the hours and days of operation of the learning center, the tennis facility, and the fields.
3. The Project Description states the fields be lighted in the evening and night. How late would the lights be allowed on during the week and weekends? The Draft EIR must study the potential for light spillover into surrounding neighborhoods and potential environmental impacts posed by such night-lighting.
4. Who are the intended and allowed users of the various Project components? Will it be open to the public? Will various elements of the Project be reserved for private leagues or members only? We understand that the Project will not be generally open to the public. Will there be any fees imposed on public users of the Project Site and to what extent will fees be imposed on the public for use of the various facilities? Please describe the programming for the Project and its various facilities in detail.
5. All potential permits and approvals that will be required for this regionally significant Project need to be identified as a part of the Project Description. The Project's construction traffic and traffic from long term operations will significantly impact City streets. Please describe the City approvals that will be required for roadway and intersection improvements and/or road and utility encroachments.
6. Please explain how the entitlement approvals for both this Project and the Plenitude Project are expected to be processed and how they will ensure their compatibility with each other and their respective connections to existing and future City infrastructure such as parks, trails, bikeways, etc.
7. Please provide detail on the expected average and maximum daily users of the Project Site and the annual number of expected visitors to the Project. Please provide the maximum capacity the Project Site will accommodate. For example, will there be any regional tennis or soccer events that would draw large crowds? The City is already experiencing public safety and public works impacts from the operations at the Stub Hub Center. Does the County propose to reimburse the City for these special event costs or will the proposed Project costs be borne entirely by the County?

8. The discussion of the surrounding land uses must be further expanded and explained. What is the plan for the remaining portion of the VGC Site? Please provide specific information.
9. Please provide a list of street improvements the proposed Project would implement in the area surrounding the Project Site. The street improvements planned for the development must be identified and analyzed (i.e., widening on Martin Luther King Jr. Street ("MLK"), need for intersection and signal modifications).
10. Please advise if there will be security / security team on-site. Please prepare a security plan for the proposed Project, including special event plan and security impacts for the surrounding vicinity.
11. Please advise what changes will be required for the existing transmission towers on-site to accommodate the Project, or how they will be incorporated within the Project.
12. Please provide a description of emergency access and evacuation routes to the Project Site and emergency / first responder access internal to the Project Site.
13. Please describe existing and proposed water use on the Project Site.
14. Please provide existing and proposed drainage on the Project Site, including integration with the City and County TMDL's as part of the watershed management plan for the Enhanced Watershed Management Program Work Plan for The Dominguez Channel Watershed Management Area Group.
15. Please provide a description of how parking will be accommodated on-site and managed off-site. How will parking of 1,200 attendees for a tennis tournament / event be handled and coordinated to accommodate parking for the other uses of the Project Site, such as the soccer and athletic fields, basketball courts, learning center, etc.?
16. Will the County or Kimmelman prepare and enter into a joint-use agreement for the Project facilities with the City? Will the proposed Project prepare a feeder program with the City for other soccer, tennis and other recreation programs? These issues should be addressed in the Draft EIR.
17. There are other agencies involved in the Project and they should be described, including the Los Angeles County Sheriff Department, Los Angeles County Fire Department, LA County Sewer Maintenance District and California Water Company. In addition, Fish and Game, Fish and Wildlife, and Army Corps of Engineers permits may be necessary for modifications of the on-site drainage channel. Also, the Project will require Federal Aviation Administration review and approval, South Coast Air Quality Management District review, California Department of Toxic Substance Control review, and City of

Carson review and approval (which will require at the very least, approval over any required roadway and street intersection improvements, any required offsite infrastructure upgrades such as sewer, water, stormwater lines, or any other improvements).

18. Is the proposed Project considered a public or private Project? If public, please explain in detail what the County's role in the development of the Project will be and to what extent the Project Site will be freely open and available to the public. Will there be any charges the public for use of the Project Site facilities?
19. Please prepare a Fiscal Impact Analysis to determine the impacts of the Project on City services.
20. Please describe all off-site improvements proposed by the Project.
21. Please explain whether there will be any removal of mature trees on the landscape perimeter and what the treatment of the perimeter of the Project Site will be.
22. As the Project Site serves as a regional park area serving the City of Carson and surrounding communities, the following are a set of regional needs we would expect to have associated with a park project of this size and scope: walking trails, additional landscaping both within the Project Site and on the perimeter, a dog park, playground areas, picnic area amenities, amenities specifically targeted to aged populations, and other amenities such as a skate park.

Aesthetics

1. Please prepare a lighting plan and analyze impacts of Project lighting on surrounding sensitive receptors to the east.
2. The Draft EIR must study the potential for light spillover into surrounding neighborhoods and potential environmental impacts posed by such night-lighting.
3. Please describe what form of tree removal and replanting program will be implemented, and analyze the impacts from same.
4. Please describe how views from surrounding areas onto the Project Site will change.
5. Please provide visual simulations from different points of view from outside the Project Site boundaries such as the channel, freeway, and streets.
6. What is the landscaping treatment of the perimeter of the proposed Project? Will the proposed Project provide landscape treatment in the area nearby the Project Site (i.e., landscaped medians)? The Project should provide landscaping and wall and fence

enhancements along the east side of Avalon Boulevard in order to mitigate aesthetic impacts imposed by the Project. Please analyze these issues in the Draft EIR and ensure mitigation measures are imposed to ensure landscape treatment, landscaping, and wall and fence enhancements within and around the Project Site.

7. Will the proposed Project underground utilities in the vicinity or will utilities be located above-ground. If above-ground, aesthetic impacts must be studied and analyzed in the Draft EIR.
8. The Project should include improvements to beautify all roads leading from the 405 Freeway to the Project Site.

Air Quality

1. The Draft EIR must provide modeling of construction and operational emissions resulting from the project using the most recent version of the California Emissions Estimator Model. Worksheets outlining the model assumptions must be included. Impacts must be considered potentially significant and must be addressed in the Draft EIR.
2. Vehicle miles traveled (VMT) is an important dataset needed to perform the construction operational air quality impact assessment (AQIR), greenhouse gas (GHG) impact assessment, and energy analysis. Please describe VMT estimates for import/export of soil and other materials during construction. Please provide sufficient detail to substantiate VMT for each of the Project components for a typical day, peak or event day, and annual averages so that the AQIR, GHG impact assessment and Energy analysis are complete and robust.
3. Please provide a list of all energy efficiency features to be incorporated. Will any solar improvements be provided on-site? Please analyze this issue in the Draft EIR.
4. Because the Project Site is a capped landfill, please describe how methane monitoring and treatment would occur on-site. Please be sure to include the Project's compaction plan and describe if any routine grading, excavation for utilities and vaults, etc. would enter the trash prism or result in trash relocation. Also please provide an analysis of Project consistency with DTSC-imposed deed restrictions or other cap requirements and limitations.
5. Please describe how dust suppression will occur during construction and also for controlling dust from the use of gravel non-paved areas for parking.
6. The Draft EIR must address cumulative air quality impacts. Impacts must be considered potentially significant and must be addressed in the Draft EIR.

Biological Resources

1. Please describe potential impacts to on-site drainages.
2. The Project should utilize the on-site drainage courses within the VGC Site as a Project amenity.

Geology and Soils

1. A Geotechnical Report must be prepared and the Draft EIR must provide an analysis of geotechnical impacts based on information provided in that report.
2. Will there be trash movement and/or digging into the trash prism? If so, please analyze this issue in the Draft EIR.
3. Please consider the soil conditions in the vicinity of the Project Site. The conditions of MLK from Main Street to Avalon Boulevard should be considered. Mitigation measures should be imposed to stabilize MLK as it is the main access point to the Project Site.
4. What is the compaction plan for the Site? Please analyze this issue in the Draft EIR.

Greenhouse Gas Emissions

1. The Draft EIR must model generation of GHG emissions using CalEEMod. Impacts must be considered potentially significant and must be addressed in the EIR.
2. Please describe and analyze the Project's connection to existing transit/ridesharing/carpooling programs or enhancement/creation of new programs will reduce VMT, and the resultant GHG emissions and energy consumption.
3. Will the Project include solar collectors, battery storage, use of LED lights, etc.? Please analyze this issue in the Draft EIR.

Hazards and Hazardous Materials

1. Is there a map that shows the depth of trash and if trash relocation will be required? Will the grading plan require significant import of earth? The Draft EIR should address the environmental impacts of developing on a former landfill, including a methane plan and Project consistency with DTSC-imposed deed restrictions or other cap requirements and limitations.
2. Please describe any work that will be performed in accordance with an approved site-specific Health & Safety Plan.

3. Please ensure a Work Notice is distributed to the community prior to the start of construction (to inform on-site workers and community of planned work).
4. Please analyze and discuss compliance with the ADA requirements for all improvements including driveways, sidewalks, and wheelchair ramps within the public right of way.
5. The mitigation measures for the Project must include the repair of any broken/damaged roadway pavement and raised/sagged sidewalk, curb and gutter, and driveways within the public right of way abutting and leading to the proposed development per the City's standards and requirements to the satisfaction of the City. A complete reconstruction of MLK will be required including permanent elimination of the settlements of the road.
6. The mitigation measures for the Project must include the filling in of any missing sidewalk within the public right of way abutting the Project Site. There are no sidewalks along MLK abutting the Project Site. In addition, there are no sidewalks along portions of the Victoria Park.
7. Access rights of the public must be considered at all times. Safe and adequate pedestrian and vehicular access must be provided and maintained continuously and unobstructed.

Hydrology and Water Quality

1. The Draft EIR must address the drainage impacts that will be imposed by the Project on the Dominguez Channel and the Torrance lateral. The City is regulated under the 2012 NPDES Permit, which has increasingly stringent surface water quality requirements. These requirements include compliance with numeric limits found in the Dominguez Channel Total Daily Maximum Loads, which the campus drains to. The City is also participating in the Dominguez Channel Enhanced Watershed Management Program, which outlines a series of mitigation measures required to improve water quality, including the construction of regional stormwater detention and ground water recharge areas. The Draft EIR must analyze these hydrology and water quality issues, including any potential impacts posed by the Project, its ability to provide regional stormwater capture from the streets and areas surrounding the Project Site, and how implementation of the Project would impact the potential degradation of water quality.
2. The Draft EIR should examine if there is underflow of contaminated ground water from the Project Site, including under the 405 Freeway to the 157-acre project (the former Cal Compact Landfill located at 20300 Main St. ("157-Acre Project")) located nearby, which includes a water treatment facility. Will the proposed Project include a water treatment facility? Please describe and analyze these issues in the Draft EIR.

Land Use and Planning

1. Please examine the goals, objectives and programs under the Carson General Plan and CMC applicable to the Project and the Project Site to determine consistency with the City's current General Plan and zoning regulations, including, without limitation, the City's Open Space Element, Traffic and Circulation Element and Parks, Recreation and Human Services Element. The Draft EIR should acknowledge the City is in the process of updating its General Plan and the proposed Project would have an impact on the General Plan Parks, Recreation and Human Services Element, among others.
2. Please examine consistency with the goals, objectives and programs of the City's Master Plan of Bikeways (dated August 2013) ("Bike Plan").
3. Please explain in detail how the County General Plan covers the proposed Project. See the General Comments above on this issue.
4. The Project will result in a reduction of the net open space available to the public and thus, based on state law, it must to be replaced 1 to 1 basis. Please describe and analyze how this issue will be addressed in the Draft EIR.

Noise

1. Will the Project prepare a noise and safety plan? If so, please describe and analyze the plan in the Draft EIR.
2. Please address CNEL impacts from construction activities and operational activities (including increased traffic) to nearby residents and schools since operations are expected into the evening and night time.
3. Will there be improvements made to the nearby residential sound wall, along the eastern side of Avalon? If so, please describe and analyze under the Draft EIR.
4. If any piles are required for the buildings and infrastructure required for the Project, please describe these in detail and analyze the noise and safety plans for the installation of such piles.
5. The City requests that potential noise impacts to offsite sensitive land uses be assessed using, at a minimum, Carson's Noise Control Ordinance (CMC, Chapter 6) and noise standards. The City has asked this of other Lead Agencies overseeing projects within the City's boundaries.

Public Services

1. The City has adopted eight (8) deficit budgets in the last eleven (11) years and is currently operating with an \$8 million deficit. Implementation of the Project will potentially have significant impacts on the service levels in the community and the Draft EIR must evaluate these impacts and propose appropriate mitigation measures. In particular, the City is concerned about the impacts on public safety. The Los Angeles County Sheriff provides contract law enforcement to the City and the City contracts with the County for Fire Department services. The City does not have a specific program in place to ensure Development Impact Fees are assessed on new projects for impacts to the Fire Department and Fire Department services. There will likely be impacts to the County Fire Department given the significant increase in use at the Project Site. There will also likely be impacts to the County Sheriff Department due to increased uses at the Project Site. Please describe and analyze how will the Project finance, pay for, and mitigate the impacts to Sheriff and Fire services. The City strongly encourages the County and the County Fire Department to consider partnering with the City's proposed EIFD to fund necessary infrastructure for this Project and the surrounding areas.
2. Other costs borne by the City include maintenance of streets, sidewalks, traffic signals and other public facilities that serve the Project Site. These impacts will need to be addressed and mitigated in the Draft EIR
3. Given the need for additional Fire service resources, the City has been working with the County Fire Department for the last several years to create a new station located near Main Street and Torrance Boulevard, however, the site is small and constrained by the adjacent residential community. Instead, the new station should be located on MLK Street on the County-owned land, east of the Project's Tennis Center, which would be ideal for the new station.
4. Other significant impacts to public services may result from parking and traffic enforcement demand. Please analyze these issues in the Draft EIR
5. Please analyze and consider impacts on street maintenance, street sweeping, and landscape maintenance, parking enforcement, code enforcement.

Recreation

1. The Draft EIR should review the potential negative and positive impacts to the City's park system and recreational programs. In particular, please discuss the impacts on Victoria Park, adjacent to the Project Site and if there are any County plans to improve the Victoria Park and the timing of these improvements. The City would like to discuss with the County the future plans for Victoria Park.

Traffic and Transportation

1. The proposed Project is a unique use and will generate much greater traffic and will result in much different traffic patterns and numbers in comparison to the current use for the Project Site. In addition
2. The traffic impact analysis for the Draft EIR should analyze typical day uses, and event uses, and must study traffic volumes and impacts that will result to the entire VGC Site as a result of the Plenitude Project and this Project and both will be redeveloped concurrently. A detailed traffic impact study ("TIS") should quantify the volumes of traffic that are generated by the current golf course use (based on actual counts), estimate the volumes of traffic that would be generated by the proposed uses (for both projects) on a typical day of activity, and then quantify the net increases in traffic volumes associated with the Project. Average Daily Traffic ("ADT") and AM/PM peak hour volumes on all significantly affected streets (including crossroads and controlling intersections).
3. The Draft EIR should utilize the findings of the SFA in analyzing traffic impacts.
4. Please provide a detailed parking demand analysis to determine the necessary parking numbers for both projects, including all new facilities proposed both for the Project and the Plenitude Project. The City has limited parking on the streets in the vicinity. Additionally, the TIS must address parking demand management strategies to include, but not be limited to, flexible school hours, subsidized transit passes and improved transit connections to the Metro stations.
5. Mitigation measures must be considered with special consideration and analysis to the development of alternate solutions to circulation impacts that do not rely on increased roadway construction. All mitigation measures studied must be fully discussed, including financing, scheduling, implementation responsibilities, and lead agency monitoring. Additionally, the TIS must address parking demand management strategies.
6. Calculation of cumulative traffic volumes must be considered for impacts created by the various components of the Project as well as the adjacent Plenitude Project, both existing and future, as the same will impact the City.
7. The TIS prepared for the Draft EIR should evaluate and analyze the impacts to local roadways, determine whether street widening is required, and determine whether intersection improvements or traffic light upgrades are required at the following intersections: MLK Street/Avalon Blvd, MLK Street/Main Street, Avalon/Del Amo, Avalon/I-405 Freeway ramps, Avalon/University, Avalon/Victoria, Avalon/Albertoni, Avalon/91 Freeway ramps, Main/Broadway, Main/I-405 Freeway ramps, Main/Victoria, Main/Albertoni, Main/91 Freeway ramps, Albertoni/91 Freeway ramps, and the site

access driveways in order to mitigate traffic impacts imposed by the Project. This list of study area intersections could potentially be reduced or expanded based on the results of the traffic generation and distribution assumptions. Please contact Mr. Richard Garland, City of Carson Traffic Engineer at (310) 830-7600 (ext. 1815) to define the study area, confirm trip generation rates, and discuss the overall methodology of the TIS.

8. The TIS for the Draft EIR should analyze impacts associated with the consistency with the City's Bike Plan. The City has been attempting to implement a bike lane along the Dominguez Channel, and at the very least, requires an easement on the County Golf Course to facilitate this regional bike path. It is our understanding that the County Parks and Recreation Department is currently reviewing the easement request. The Project could have the potential of impacting a regionally significant bike path and should be reviewed in the Draft EIR. Also, the Project does not contain sufficient detail, if any, as to whether dedicated transit will be provided and if there are any bike facilities/pathway linkages from the Project Site to the City's bike lanes and paths as outlined in the City's Bike Plan. To mitigate the impacts of the Project, the Project shall be required to construct the bike lanes surrounding the Project Site including Dominguez Channel, MLK, and Avalon.
9. The Project should consider providing an on-site transit facility to mitigate the traffic impacts on the City streets as well as its imposition of noise and air pollution.
10. The Draft EIR must address sufficiency of emergency access to proposed facilities. Impacts are considered potentially significant and must be addressed in the Draft EIR. Without adequate emergency access roads, the Project could have a potential significant impact on public safety. The Draft EIR should examine access to the fields in particular, which are located to the far interior of the Project, away from the public streets serving the Project Site. Internal safety access roads may be necessary to adequately serve this remote area.
11. The Project mitigation measures for traffic need to assess and include both the Project Site and Plenitude Project, since there will be many trips that are attributable to both projects and the impacts of both projects collectively, will be much different than if analyzed separately. Will either or both of these projects include any improvements to the 405 Freeway and the Main Street freeway off-ramp? What mitigation measures will be incorporated to relieve traffic congestion on Avalon Blvd.? Are any new traffic lights or intersection modifications necessary? Will the Project include directional signs at the Main Street off-ramp, as well as way-finding signs on Main Street to assist patrons in reaching MLK and the Project Site entries?
12. MLK is not classified as a major thoroughfare and the Project needs to be corrected in this classification.

13. Impacts to the I-405 Freeway and Main interchange and other nearby interchanges need to be analyzed in the TIS and provide mitigation measures as necessary.
14. The Draft EIR should identify the existing transit operators that serve the Project Site and the transit impacts of the Project.

Utilities

1. The Draft EIR should discuss if the existing golf course is served by a water treatment system on the Project Site, and whether and how the system would be utilized by the Project.
2. Is reclaimed water available to serve the Project or would it be extended and used for irrigation purposes? The Draft EIR should document the availability of reclaimed water in the area (as supplied by the West Basin Municipal Water District) for irrigation purposes.
3. Although not included in the Initial Study, the City would like to see an Energy Conservation section to the Draft EIR, in accordance with Appendix F of the CEQA Guidelines.

Cumulative Impacts

1. As described in detail above, it is extremely difficult to effectively evaluate the full extent of the Project's environmental impacts, especially the traffic and circulation impacts of the Project and impacts on public safety and City services, since the Draft EIR only proposes to review the 87 acres of the 187-acre golf course redevelopment project. The potential impacts of the future redevelopment of the entirety of the VGC Site are not discussed. The Draft EIR should examine the potential revenues and costs of the City services provided to the Project as well as the Plenitude Project.

Mandatory Findings of Significance

1. Please include a description and analysis of the growth-inducing impacts of the Project.
2. Please explain the extent to which the Project will require new or increased City services, new roadways, utilities, and other public facilities.

Alternatives

1. As a part of the Draft EIR, the County must a conduct thorough evaluation of alternatives to the Project (including the "No Project" alternative). The Draft EIR must describe a range of alternatives to the proposed Project, and to its location, that would feasibly attain

Ryan Kristan
August 31, 2018
Page 16

the County's basic objectives while avoiding or substantially lessening the significant impacts from implementation of the Project. Pub. Res. Code § 21 100(b)(4); CEQA Guidelines § 15 126.6(a).

2. A legally sufficient analysis of alternatives is essential to comply with CEQA's mandate that significant environmental damage be avoided or substantially lessened. Pub. Res. Code § 21002; CEQA Guidelines §§ 15002(a)(3), 15021(a)(2), 15126.6(a). The EIR must carefully analyze alternatives that reduce impacts on the City, its public and private facilities and infrastructure, and on its residents.

And finally, please note that the City of Carson requests additional scoping with the County and Kimmelman pursuant to CEQA Guidelines § 15083. In particular, the City requests to be engaged in the scope of the technical studies (*i.e.*, traffic, etc.) as well as project alternatives. Separately, City staff has met with both the development teams from Plenitude Holdings and Kimmelman and agreed that further meetings should be held with the County, their teams and the City, which will involve the planning and environmental teams for both projects. The issues addressed, action items taken, and results of these meetings should be included as part of the Draft EIR for the Project.

The City of Carson thanks you for considering these comments as these are highly sensitive concerns for us. Please feel free to contact me at (949) 223-1170 if you have any questions or would like to discuss these concerns in further detail.

Very truly yours,

ALESHIRE & WYNDER, LLP



Danny Aleshire
Legal Counsel for the City of Carson

cc (*via email*): Kenneth Farfsing, City Manager
John Raymond, Assistant City Manager
Saied Naaseh, Community Development Director
Danielle Griffith, Environmental Science Associates (ESA)
Heidi Rous, ESA

**Carol Kimmelman Sports and Academic Campus Project EIR
Scoping Meeting Comments**

Please hand in to County staff at the meeting or mail back by Friday, August 31, 2018.

Name: Sandra Lewis
Affiliation: Resident
Address: 242 E. Turmont St.
City, State, Zip Code: Carson, CA 9074
Phone (optional):
E-mail (optional):
Would you like to remain on our mailing list to receive future project updates? Yes ___ No

Comments:

1. Have the Golf Course been sold?
2. What is Draft EIR?
3. What undeserved youths are you referring to from the Carson area?
4. Concern regarding safety and noise for this project in our area.

**Carol Kimmelman Sports and Academic Campus Project EIR
Scoping Meeting Comments**

Please hand in to County staff at the meeting or mail back by Friday, August 31, 2018.

Name:

DAVID JEFFERS

Affiliation:

CAROL RESIDENT

Address:

17524 RAINBOW AVE

City, State, Zip Code:

CARSON, 90746

Phone (optional):

E-mail (optional):

Would you like to remain on our mailing list to receive future project updates? Yes No

Comments:

① WHERE IS RILEY THOMAS ?

② WHAT BENEFITS/CONCESSIONS ARE BEING MADE FOR GOLF PATRONS ?

③ WHY IS THE UTA INVOLVED ?

THERE IS ALREADY A UTA FACILITY IN CARSON
THAT RESIDENTS CAN'T USE!

④ WHERE IS RILEY THOMAS AND WHY WOULDN'T HE ADDRESS THE LOCAL COMMUNITY ?

**Carol Kimmelman Sports and Academic Campus Project EIR
Scoping Meeting Comments**

Please hand in to County staff at the meeting or mail back by Friday, August 31, 2018.

Name:

Verteane Bereal

Affiliation:

Resident -

Address:

City, State, Zip Code:

Phone (optional):

E-mail (optional):

vbereal@yahoo.com

Would you like to remain on our mailing list to receive future project updates? Yes No

Comments:

Any residents whose neighborhoods could be adversely affected by traffic need to be invited to a special meeting to discuss the possible impact and proposed remedies. I was told that Elsmere is a street that will be extended to lead into the complex. Not sure if Turmont or other streets will also be extended. Special notification needs to go to residents on these streets.

Carol Kimmelman Sports and Academic Campus Project EIR
Scoping Meeting Comments

Please hand in to County staff at the meeting or mail back by Friday, August 31, 2018.

Name: ARTHUR WILLIAMS
Affiliation: UNIVERSITY HEIGHTS HOMEOWNERS ASSOCIATION
Address: 701 LOYOLA AVE., CARSON, CA. 90746
City, State, Zip Code: CARSON, CA. 90746
Phone (optional): _____
E-mail (optional): ATWILL29200@MSN.COM
Would you like to remain on our mailing list to receive future project updates? Yes No

Comments:

IT APPEARS THAT THIS PROJECT IS DESIGNED TO PRIMARILY BENEFIT YOUTH, ALTHOUGH I QUESTION THAT IT IS TO SERVE UNDERSERVED YOUTH. WHO ARE THESE UNDERSERVED YOUTH. MY CONCERNS ARE MANY, INCLUDING THE ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED. ADDITIONALLY, HOW DOES THIS PROJECT BENEFIT THE SURROUNDING COMMUNITIES WHERE AT LEAST 60% OF THE RESIDENTS ARE OVER THE AGE OF 60? I FEEL THERE SHOULD BE FACILITIES TO ACCOMMODATE THAT POPULATION SPECIFICALLY: I.E.: AN INDOOR AND OUTDOOR EXERCISE FACILITY FOR SENIORS AND APPROPRIATE AMENITIES FOR DISABLED PERSONS.

I THINK IT IS FINE TO HAVE TENNIS COURTS AND SOCCER FIELDS BUT IS IT NECESSARY TO HAVE 50 TENNIS COURTS AND 8 SOCCER FIELDS? THIS SPACE COULD BE MORE APPROPRIATELY USED FOR COMMUNITY PROGRAMS, AS YOU SAY, FOR ADULTS WHO DO NOT ENGAGE IN TENNIS OR SOCCER.

ANOTHER CONCERN IS ABOUT THE ROAD, MARTIN LUTHER KING, JR. STREET: WHO WILL BE RESPONSIBLE FOR CORRECTING IT, AND HOW/WHAT WILL BE DONE

Comments (continued)

TO FIX IT?

YET ANOTHER CONCERN IS ABOUT OUR PROPERTY VALUES. WILL PROPERTY VALUES INCREASE AS A RESULT OF THIS PROJECT, AND, IF SO, WILL OUR PROPERTY TAXES INCREASE? ~~THEY~~ FOR SOME RESIDENTS, PROPERTY TAXES ARE ALREADY EXORBITANT!

Please fold in thirds

Please tape it closed, affix a stamp, and mail by August 31, 2018. Thank you!

31 AUG 2018 PM 11 L



County of Los Angeles Department of Public Works
Project Management Division II
900 South Fremont Avenue, 5th Floor
Alhambra, California 91803
Attn: Ryan Kristan



CT

August 11, 2018

Ryan Kristan
County of Los Angeles Department of Public Works - Project Management Division II
900 South Fremont Avenue, 5th Floor,
Alhambra, CA 91803

Re: Carol Kimmelman Sports and Academic Campus // To: 3M Company

Case No.

Dear Sir/Madam:

After checking our records and the records of the State of CA, it has been determined that C T Corporation System is not the registered agent for an entity by the name of 3M Company.

CT was unable to forward.

Very truly yours,

C T Corporation System

Log# 533860771

Sent By Regular Mail

cc: --

(Returned To)

Ryan Kristan
County of Los Angeles Department of Public Works - Project Management Division II
900 South Fremont Avenue, 5th Floor,
Alhambra, CA 91803

Nicole Cobleigh

From: Ryan Kristan (Consultant) <rkristan@dpw.lacounty.gov>
Sent: Tuesday, September 4, 2018 8:10 AM
To: Derek.Galey@lw.com; Nicole Cobleigh
Subject: FW: Concerns about Development Victoria Park Golf Course

Derek and Nicole,

Please see below for comments on the Kimmleman NOP.

Ryan

Ryan Kristan, Architect
Project Manager
Los Angeles County Public Works
Office (626) 300-3271
Cell (213) 840-7004

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From: david hollaway <hollaway.david@gmail.com>
Sent: Friday, August 31, 2018 2:57 PM
To: Ryan Kristan (Consultant) <rkristan@dpw.lacounty.gov>
Subject: Concerns about Development Victoria Park Golf Course

Dear Ryan,

I am reaching out to you regarding the redevelopment of the Victoria Park Golf Course. I am part of a group of long time District 2 members that have serious concerns about the amenities being offered in the redevelopment.

To start, we believe the project is being planned with very little knowledge of the sporting needs of local community. While we are certainly excited about the amenities (soccer center and tennis courts) in the new development, we believe that football and track are being either ignored or overlooked. Anyone with knowledge of the District 2's rich history in producing football, basketball, and track athletes would surmise that to install 27 tennis courts and 10 soccer fields is not meeting all of the needs of the community and is a disservice to the boys and girls who participate in youth sports in this area.

Furthermore, I would like to state a few well-known facts about District 2:

- District 2 has the one of the **richest football histories in the United States.**
- Carson, Inglewood, Baldwin Youth football & cheer programs have been in existence for **more than 50 years.**
- **Tens of millions of dollars** in football and track scholarships have been awarded to District 2 residents.
- District 2 has produced **hundreds professional athletes** in football, basketball, and track.
- The **five square mile area (Carson, Compton, Gardena, LA) surrounding** the project has produced tens of thousands of college football and basketball players and track athletes.

We believe that for this project to fully meet the needs of District 2 residents the project must respect the tradition and needs of District 2 community members as well as consider input from individuals with a deep knowledge of the youth sporting scene.

I have been a District 2 resident for a period of 47 years. I participated in youth football and basketball at Victoria Park, coached various youth programs, and was president of a District 2 youth football program for 8 years.

At your convenience we would like to discuss our concerns in front of the appropriate audience. We believe that our concerns are valid and the remedy to those concerns reasonable. Here is what we would like to discuss:

- Installing lined football fields.
- Installing a full track.

We look forward to your prompt response.

Regards,

David Hollaway

**Carol Kimmelman Sports and Academic Campus Project EIR
Scoping Meeting Comments**

Please hand in to County staff at the meeting or mail back by Friday, August 31, 2018.

Name: Janice Sumpter
Affiliation: Resident
Address: 1842 E. Abbotson St
City, State, Zip Code: Carson, CA 90746
Phone (optional): _____
E-mail (optional): JSumpter4@yahoo.com
Would you like to remain on our mailing list to receive future project updates? Yes No

Comments:

I would like to see a real meeting
NOT an scoping ^{meeting}, where we can ask questions
that can be answered.

How is this project going to affect the residence
AS FAR AS TAXES? who is paying for the lighting
water ect.?

Where is the Staffing coming from?

Who are you targeting? Our tennis courts
are ^{not} being used to the compacity now.

Why was the city of Carson chosen for
this project location?

Comments (continued)

Who are the people that are going to be Bused in to use the Courts and Soccer fields?

Will there be a Charge?

Who is conducting EIR Report?

Will Mark Ridley-Thoms be showing up to any of the Community meeting?

Why wasn't more residents informed regarding this meeting?

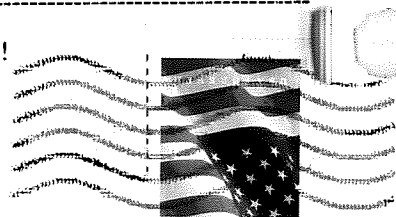
20 AUG AM 9:40

Please fold in thirds

Please tape it closed, affix a stamp, and mail by August 31, 2018. Thank you!

LOS ANGELES CA 900

17 AUG 2018 PM 13 11



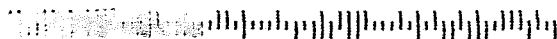
County of Los Angeles Department of Public Works

Project Management Division II

900 South Fremont Avenue, 5th Floor

Alhambra, California 91803

Attn: Ryan Kristan



**Carol Kimmelman Sports and Academic Campus Project EIR
Scoping Meeting Comments**

Please hand in to County staff at the meeting or mail back by Friday, August 31, 2018.

Name: Lisa Bullock

Affiliation: _____

Address: 19621 Dunbrooke Avenue

City, State, Zip Code: Carson, Ca 90746

Phone (optional): _____

E-mail (optional): lisa@john@shcglobal.net

Would you like to remain on our mailing list to receive future project updates? Yes No

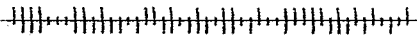
Comments:

Hello, I live across the street from the current golf course on the opposite side of Avalon. I am 4 houses south of Els Mere and based on the map that's been provided it looks like construction will be taking place across from the backyards of the houses on Dunbrooke. I would like to request that measures are taken to put up barrier tarps to stop the dust from crossing the street (Avalon) into our backyards. There was previous work done across at the golf course a few years ago and no barriers were put up so we had to endure the dirt in our backyards and daily dust/dirt in our homes. Please be considerate of the neighbors on this go round
Thank you Lisa Bullock

Comments (continued)

Lined area for writing comments.

91803



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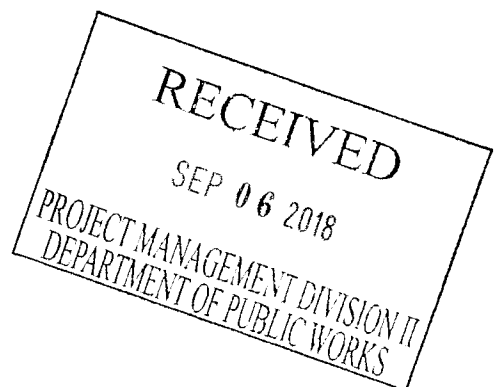
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LOS ANGELES CA 900

30 AUG 2018 PM 4 L



County of Los Angeles Department of Public Works
Project Management Division II
900 South Fremont Avenue, 5th Floor
Alhambra, California 91803
Attn: Ryan Kristan



**Carol Kimmelman Sports and Academic Campus Project EIR
Scoping Meeting Comments**

Please hand in to County staff at the meeting or mail back by Friday, August 31, 2018.

Name: SHIRLEY VERNON
Affiliation: RESIDENT OF CARSON, CA. 90746
Address: 18806 TOWNE AVE.
City, State, Zip Code: CARSON, CA. 90746
Phone (optional): _____
E-mail (optional): SVERNON7113@SBCGLOBAL.NET
Would you like to remain on our mailing list to receive future project updates? Yes No

Comments: I AM CONCERNED ABOUT THE HAZARDOUS CHEMICALS AND MATERIALS IN THE GROUND WHERE YOU ARE GOING TO PUT THE TENNIS COURTS AND SOCCER FIELDS. THIS WOULD BE VERY DANGEROUS FOR THE CHILDREN AND ADULTS USING THEM.

WE GET A LOT OF TRAFFIC IN VICTORIA PARK (VICTORIA ST ON THE NORTH - MARTIN LUTHER KING JR. ST ON THE SOUTH - AVALON ON THE EAST AND MAIN ST ON THE WEST) FROM THE STUB HUB CENTER. THEY PUT UP BARACADES TO KEEP CARS FROM PARKING IN VICTORIA PARK. IT DOES NOT WORK AS THE PERSON AT THE BARACADE DOES NOT STOP ANYONE FROM COMING INTO VICTORIA PARK. WE HAVE REGISTERED PERMITS FOR US TO PARK IN VICTORIA PARK.

WE DO NOT WANT ANY MORE TRAFFIC & NOISE FROM YOUR PROJECT. THANK YOU

Comments (continued)

-----Please fold in thirds-----



Shirley K. Vernon
18806 Towne Ave.
Carson, CA 90746

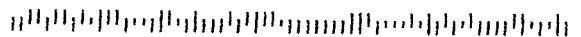
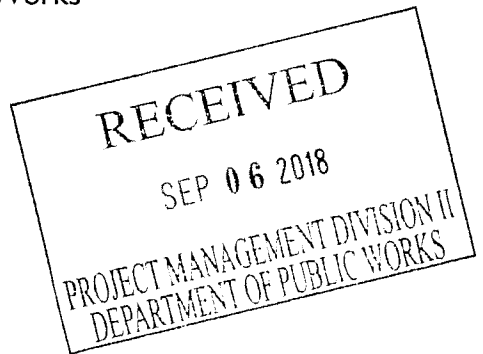
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LOS ANGELES CA 900

SEP AUG 28 12 PM '18



County of Los Angeles Department of Public Works
Project Management Division II
900 South Fremont Avenue, 5th Floor
Alhambra, California 91803
Attn: Ryan Kristan



Nicole Cobleigh

From: rkristan@dpw.lacounty.gov
Sent: Wednesday, August 15, 2018 1:40 PM
To: Derek.Galey@lw.com; Nicole Cobleigh
Subject: FW: Kimmelman EIR Scoping Meeting Comments
Attachments: Kimmelman EIR Scoping.pdf

Derek and Nicole,

Please see the email below with the referenced attachment. This is in response to last night's meeting.

Ryan Kristan, Architect
Project Manager
Los Angeles County Public Works
Office: (626) 300-3271

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From: vince goshi <vincegoshi@cox.net>
Sent: Tuesday, August 14, 2018 7:41 PM
To: Ryan Kristan (Consultant) <rkristan@dpw.lacounty.gov>
Subject: Kimmelman EIR Scoping Meeting Comments

Ryan:

It was a pleasure talking to you. As I said at the meeting, none of what we say is meant as personal to you. I know you have a job to do. We are fighting as hard as we can to try to save a golf course at Victoria. We know it is an uphill battle against organizations that have interest other than ours and have a lot more money and political clout. But, we are fighting nonetheless.

I have attached the comments I told you I had. If you want it in Word format, I can send that to you.

Regards;
Vince Goshi
310 303 9218 (cell)

Carol Kimmelman Sports and Academic Campus Project EIR
Scoping Meeting Comments

Name: Vincent S. Goshi

Affiliation: Golfer at Victoria Golf Course

Address: 28610 Mount Rushmore Road

City, State, Zip Code: Rancho Palos Verdes, CA, 90275

Phone: 310-303-9218 (cell)

E-mail: vincegoshi@cox.net

Include me in future project updates

Comments:

- 1) Request that EIR include impact changing environment from a golf course to a tennis center will have on the many golfers who use the golf course including senior golfers, youth golfers, high school and college golfers, instructors, etc. Please evaluate what impact changing this environment will have on the physical and mental health of seniors who use the golf course for exercise and mental stimulation. Interview at least 50 seniors who regularly use the golf course to get an objective and empirical assessment of the impact to this group. Please include quantitative analysis of known current use and what known tennis use will be. Please provide supporting data for analysis.
- 2) Request EIR include impact to senior golfers 65 and over who play most weekdays between dawn and 0700. Senior golfers holding senior discount cards cannot make reservations weekdays between 0700 and 0900. So, many start play before 0700 and play in about 3 hours versus 5 hours-6 hours with a later start. If these golfers are forced to move to another County course in the area,

please describe impact to new seniors moving to new course and existing seniors at that course who play at the same times. Describe impact to these golfers experience. (see attached list of current early morning senior golfers dubbed dawn patrol for substantiation.)

- 3) Please include analysis of what construction on this former landfill will have on Towne Elementary school and whether all statutory and regulatory requirements regarding construction so close to a school will have on students, teachers, and staff.
- 4) Please include studies on what chemical and toxic substances might be transported to the surrounding schools and neighborhood because of construction on the site. Please identify all toxic substances buried under the site and what measures will be used and approved to prevent these substances from infiltrating surrounding neighbors. Please discuss what effects will be if these substances are ingested by people because of the construction.
- 5) Please include reports from the Department of Toxic Substance Control (DTSC) that approve of any construction to be accomplished on the site.

Week Day Dawn Patrol Players At Victoria GC

Before 0700 Start Times

Name	Age	M	T	W	Th	F
Vinny's Group (8)						
Vincent Goshi	74	X	X	X	X	X
Shinja Miyata	72	X	X	X	X	X
Tad Maeda	75	X	X		X	X
Tad Asanuma	76	X	X	X		X
Calvin Hokama	67	X	X	X	X	X
John Steible	80			X		X
Toshi Fujimura	73		X			X
Jim Takata	76			X		
Corona Group (3)						
Terry Woolsey	70					X
Alan Shaw	71					X
Denny Weems	70					X
Roman's Group (4)						
Bill Hayward	81	X	X			X
Roman Peebles	76	X	X			X
Willie Bostic	84	X				X
Greg Taylor	69	X		X		X
Hutch's Group (5)						
Hachiro Maewaki	93	X		X		X
Katsumi Ota	80	X		X		X
Fred Abarentos	75	X		X		X
Bob Uehara	84	X		X		X

Ernie	73			x		

Name	Age	M	T	W	Th	F
Ortega's Group (5)						
Rubin Flores	67				x	x
Mike Ortega	68	x		x		x
Brad Godfrey	80	x		x		x
Mike Glynn	76	x		x		x
Harold Bailey	60	x		x		x
Akamai Group (25)						
Juan Aguirre	72	x				
Elton Hirasuna	72	x				
Wesley Kitamura	71	x				
Ronald Babick	76	x				
Ron Masuda	74	x				
Larry Ume	69	x				
Makayuki Orié	71	X				
Donald Reed	71	x				
Ron Tabura	69	x				
Tony Arce	79	x				
Dennis Paelinawan	74	x				
Michael McAlister	66	x				
Tom Kawate	76	x				
Jim Austin	68	x				
Ron Teunon	78	x				
Jorge Oller	77	x				
Elliot Matsuoka	74	x				
Yoshi Kawamoto	71	x				

Nicole Cobleigh

From: rkristan@dpw.lacounty.gov
Sent: Wednesday, August 15, 2018 3:27 PM
To: Derek.Galey@lw.com; Nicole Cobleigh
Subject: FW: Kimmelman EIR Scoping Meeting Comments

Derek,

Please see comment on IS.

Ryan Kristan, Architect
Project Manager
Los Angeles County Public Works
Office: (626) 300-3271

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From: vince goshi <vincegoshi@cox.net>
Sent: Wednesday, August 15, 2018 3:13 PM
To: Ryan Kristan (Consultant) <rkristan@dpw.lacounty.gov>
Subject: RE: Kimmelman EIR Scoping Meeting Comments

Ryan:

I have reviewed the initial EIR study listed on the Kimmelman site. It totally ignores negative impacts to some 2200+ people who signed a petition to KEEP GOLF AT VICTORIA. I have electronic copies of all these signatures which I can send in a link. This would appear to be a major omission from the report.

Thanks.
Vince

From: Ryan Kristan (Consultant) [<mailto:rkristan@dpw.lacounty.gov>]
Sent: Wednesday, August 15, 2018 1:38 PM
To: vince goshi <vincegoshi@cox.net>
Subject: RE: Kimmelman EIR Scoping Meeting Comments

Good Afternoon Vince,

I have received both of your emails sent last night. Thank you for the comments and information. We will respond accordingly.

Thanks again,
Ryan

Ryan Kristan, Architect
Project Manager

Los Angeles County Public Works
Office: (626) 300-3271

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From: vince goshi <vincegoshi@cox.net>
Sent: Tuesday, August 14, 2018 9:53 PM
To: Ryan Kristan (Consultant) <rkristan@dpw.lacounty.gov>
Subject: RE: Kimmelman EIR Scoping Meeting Comments

One more thing, I have attached the cover from Plenitude's brochure that has the County seal but no mention of Plenitude. I asked Fred Macfarlane if he had permission to use the seal on the cover when the brochure is not a County document. He told me he did not have to have permission. I told Fred that he was being deceptive in presenting the brochure like that. He flat out said "no he was not." At that point I told him I did not want to talk to him anymore. What a prick for a PR guy.

From: vince goshi [<mailto:vincegoshi@cox.net>]
Sent: Tuesday, August 14, 2018 7:41 PM
To: Ryan Kristan (rkristan@dpw.lacounty.gov) <rkristan@dpw.lacounty.gov>
Subject: Kimmelman EIR Scoping Meeting Comments

Ryan:

It was a pleasure talking to you. As I said at the meeting, none of what we say is meant as personal to you. I know you have a job to do. We are fighting as hard as we can to try to save a golf course at Victoria. We know it is an uphill battle against organizations that have interest other than ours and have a lot more money and political clout. But, we are fighting nonetheless.

I have attached the comments I told you I had. If you want it in Word format, I can send that to you.

Regards;
Vince Goshi
310 303 9218 (cell)

Nicole Cobleigh

From: Derek.Galey@lw.com
Sent: Friday, August 17, 2018 5:48 PM
To: Michele Webb; Nicole Cobleigh
Cc: MARIA.HOYE@lw.com
Subject: FW: Challenge Accommodating Displaced Senior Golfers
Attachments: letter_to_Garcia.pdf

Michelle,

Here is another one. Please make sure this letter finds its way to Nicole for inclusion in the record for the scoping meeting.

Best,
Derek

From: vince goshi <vincegoshi@cox.net>
Sent: Tuesday, August 14, 2018 8:03 PM
To: Mihilsten, George (LA) <GEORGE.MIHLSTEN@lw.com>
Subject: Challenge Accommodating Displaced Senior Golfers

George:

It was nice meeting and chatting with you at the EIR Scoping meeting. Perhaps the best way I can describe the challenge is to have you read the letter I sent to Chief Deputy Norma Garcia, Parks & Recreation, that describes the challenge and why it will be extremely difficult to accommodate us at the other County courses, see attached letter.

I know I'm biased but from my perspective, it feels cruel and mean to throw all of us under-the-bus after we've been here for half a century. We've been a constituent all this time, and still are, and it seems just plain wrong to throw us all out even though Kimmelman is bringing millions to the table. They have never been here, still aren't, the main argument is they are bringing millions to the County. If that were the main objective of these facilities, which they are not, then all the golf courses could be used that way. The only reason Victoria is a target is because the fairways are subpar so it does not generate as much income as other courses. But, the condition of the fairways is a failure of the County, not us golfers.

Anyway, you asked for this information so here it is. You seem like a resourceful guy, good luck. I hope you can come up with something good.

Regards:
Vince Goshi

310 303 9218 (cell)

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August 13, 2018

Vincent Goshi
28610 Mount Rushmore Road
Rancho Palos Verdes, CA 90275
vincegoshi@cox.net
310 303 9218 (cell)

Sent via email

Ms. Norma Garcia
Chief Deputy Director, Department of Parks and Recreation
Los Angeles County

Subject: Victoria Golf Course Repurpose, Senior Dawn Patrol Players

Dear Chief Deputy Director Garcia:

This letter is a follow-up to our telephone conversation last Monday, August 6, 2017. I wanted to direct your attention to a comment you made about making arrangements or accommodating us at the other nearby county courses if Victoria's course is closed. This will be extremely difficult if not impossible to do for a large group of seniors all of whom are 65 or older, pay \$28 a year to get a senior citizen golf ID card, and reserve starting times before 7 AM on weekdays. These reservations cannot be made between 7 AM and 9 AM so all of us seniors start early. Most courses refer to these players as the "dawn patrol" because we start before sun-up in order to get everyone out before 7 AM. I play at Victoria early every weekday morning so I know all the groups that do this. I have enclosed a list of the groups and people that do this at Victoria and the number in each group. There are a total of approximately 50 seniors who do this, with Monday being the busiest when approximately 42 play (see enclosed tables).

It will be practically impossible to accommodate these groups at the other courses because each course has their own "dawn patrol" groups. Sending this many people to, say, Alondra, will create a very unpleasant situation not only for us but for the seniors at Alondra. Playing after 9 AM is also unpleasant because whereas we play in about 3 hours starting early, starting after 9 AM means 5 hour – 6 hour rounds. This is why we start early.

I wanted to send you this information so people who are making decisions that could close Victoria know what this would mean to real people. These are people who worked all their lives and supported Victoria all these years and now want to enjoy their retirement.

Please pass this information on to those who will be making the decisions.

Thank You.

Vincent S. Goshi
310 303 9218 (cell)

Week Day Dawn Patrol Players At Victoria GC
Before 0700 Start Times

Name	Age	M	T	W	Th	F
Vinny's Group (8)						
Vincent Goshi	74	X	X	X	X	X
Shinja Miyata	72	X	X	X	X	X
Tad Maeda	75	X	X		X	X
Tad Asanuma	76	X	X	X		X
Calvin Hokama	67	X	X	X	X	X
John Steible	80			X		X
Toshi Fujimura	73		X			X
Jim Takata	76			X		
Corona Group (3)						
Terry Woolsey	70					X
Alan Shaw	71					X
Denny Weems	70					X
Roman's Group (4)						
Bill Hayward	81	x	x			x
Roman Peebles	76	x	x			x
Willie Bostic	84	x				x
Greg Taylor	69	x		x		x
Hutch's Group (5)						
Hachiro Maewaki	93	x		x		x
Katsumi Ota	80	x		x		x
Fred Abarentos	75	x		x		x
Bob Uehara	84	x		x		x

Ernie	73			x		

Name	Age	M	T	W	Th	F
Ortega's Group (5)						
Rubin Flores	67				x	x
Mike Ortega	68	x		x		x
Brad Godfrey	80	x		x		x
Mike Glynn	76	x		x		x
Harold Bailey	60	x		x		x
Akamai Group (25)						
Juan Aguirre	72	x				
Elton Hirasuna	72	x				
Wesley Kitamura	71	x				
Ronald Babick	76	x				
Ron Masuda	74	x				
Larry Ume	69	x				
Makayuki Orié	71	X				
Donald Reed	71	x				
Ron Tabura	69	x				
Tony Arce	79	x				
Dennis Paelinawan	74	x				
Michael McAlister	66	x				
Tom Kawate	76	x				
Jim Austin	68	x				
Ron Teunon	78	x				
Jorge Oller	77	x				
Elliot Matsuoka	74	x				
Yoshi Kawamoto	71	x				

Nicole Cobleigh

From: Ryan Kristan (Consultant) <rkristan@dpw.lacounty.gov>
Sent: Monday, August 27, 2018 8:36 AM
To: Nicole Cobleigh; Derek.Galey@lw.com
Subject: FW: Data To Use For EIR Regarding Recreational Impacts To Existing Victoria Golf Course And/Or Golf Facilities Usage
Attachments: usage_IMG_20180823_0002_NEW.pdf; Dawn Patrol Players At Victoria GC.pdf

Good Morning Nicole and Derek,

Please see email below and attached regarding the environmental documents.

Ryan Kristan, Architect
Project Manager
Los Angeles County Public Works
Office (626) 300-3271
Cell (213) 840-7004

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From: vince goshi <vincegoshi@cox.net>
Sent: Friday, August 24, 2018 4:44 PM
To: Ryan Kristan (Consultant) <rkristan@dpw.lacounty.gov>
Subject: Data To Use For EIR Regarding Recreational Impacts To Existing Victoria Golf Course And/Or Golf Facilities Usage

Ryan:

I collected empirical data on how many people are currently using Victoria Golf Course and/or the golf facilities for recreation on a regular basis. This list does not include people who are occasional users of the facilities, just ones who use it regularly. Here is the data in summary form:

Victoria Senior Men's Club – 59 members, all seniors
Gauchos and Gringos Golf Club – 84 members, all seniors
Victoria Women's Golf Club – 20 members, all seniors
High Schools – 150 players (see attached usage for list)
Colleges – 55 players (see attached usage for list)
Jr. Programs – 400+, all youngsters (see attached usage for list)
Instruction – 375 (see attached usage for list)
Player's Club – 500 + (people who pay \$40 per month to hit balls at the driving range)

Total tally = 2011 people that use the golf course and/or golf facilities on a regular basis. Some double counted, e.g., Player's club people, but tally is close.

Additionally, there are between 40-50 senior golfers who play every weekday before 7 AM. These seniors are listed in the attachment dawn patrol. It will be impossible for these seniors to go to another County course and get pre-7 AM tee times if the course gets closed.

As part of the environmental impact of Kimmelman's project, I request that the impact to these people's recreation be included. As you know, neither Kimmelman's or Plenitude's plans provide anything for this group of people. I would be interested in seeing what the report comes up with and what mitigation measures will be proposed to address the major loss of recreation for this group of people.

Regards:

Vince Goshi

310 303 9218 (cell)

High School	Contact	Golfers
North Torrance	Dean	22
South Torrance	Kelly Wood	20
Carson		15
Peninsula	Glen Van Enk	15
Torrance	Sherri Carr	20
Chadwick	Gus Sartorious	12
Palos Verdes	Ray Rivera	26
Mira Costa	tracy Gellere	20

Colleges

CSUDH	Ron Eastman	15
El Camino	Stacy Komai	15
Marymount University	Mike Miller	25

Junior Programs

First Tee	Christopher Steel	100+
US Kids	Gary Mizumoto	140+
Nike Golf	Jason Bae	70+
LA County Jr Golf	Mike McMongal	80+

Instructors

Lessons per week

Larry Schneider	35
Eric Manley	50
Jason Bae	55
Russ Fraser	30
Don Brown	70
Taka	60
Cheech	30
Tod Di Angeles	45

Week Day Dawn Patrol Players At Victoria GC

Before 0700 Start Times

Name	Age	M	T	W	Th	F
Vinny's Group (8)						
Vincent Goshi	74	X	X	X	X	X
Shinja Miyata	72	X	X	X	X	X
Tad Maeda	75	X	X		X	X
Tad Asanuma	76	X	X	X		X
Calvin Hokama	67	X	X	X	X	X
John Steible	80			X		X
Toshi Fujimura	73		X			X
Jim Takata	76			X		
Corona Group (3)						
Terry Woolsey	70					X
Alan Shaw	71					X
Denny Weems	70					X
Roman's Group (4)						
Bill Hayward	81	X	X			X
Roman Peebles	76	X	X			X
Willie Bostic	84	X				X
Greg Taylor	69	X		X		X
Hutch's Group (5)						
Hachiro Maewaki	93	X		X		X
Katsumi Ota	80	X		X		X
Fred Abarentos	75	X		X		X
Bob Uehara	84	X		X		X

Ernie	73			x		

Name	Age	M	T	W	Th	F
Ortega's Group (5)						
Rubin Flores	67				x	x
Mike Ortega	68	x		x		x
Brad Godfrey	80	x		x		x
Mike Glynn	76	x		x		x
Harold Bailey	60	x		x		x
Akamai Group (25)						
Juan Aguirre	72	x				
Elton Hirasuna	72	x				
Wesley Kitamura	71	x				
Ronald Babick	76	x				
Ron Masuda	74	x				
Larry Ume	69	x				
Makayuki Orié	71	X				
Donald Reed	71	x				
Ron Tabura	69	x				
Tony Arce	79	x				
Dennis Paelinawan	74	x				
Michael McAlister	66	x				
Tom Kawate	76	x				
Jim Austin	68	x				
Ron Teunon	78	x				
Jorge Oller	77	x				
Elliot Matsuoka	74	x				
Yoshi Kawamoto	71	x				

Nicole Cobleigh

From: Ryan Kristan (Consultant) <rkristan@dpw.lacounty.gov>
Sent: Monday, August 20, 2018 8:40 AM
To: Derek.Galey@lw.com; Nicole Cobleigh
Subject: FW: Carol Kimmelman Sports Complex Concerns/Comments Revised

Good Morning Derek and Nicole,

Please see below on comments from the scoping meeting.

Ryan Kristan, Architect
Project Manager
Los Angeles County Public Works
Office: (626) 300-3271

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From: Vega, Yvette <yvette.vega.281@my.csun.edu>
Sent: Wednesday, August 15, 2018 8:34 PM
To: Ryan Kristan (Consultant) <rkristan@dpw.lacounty.gov>
Subject: Carol Kimmelman Sports Complex Concerns/Comments Revised

Hello Mr. Kristan,

First off, thank you for coming to the city of Carson to present The Carol Kimmelman Center. I have been a resident of Carson for five years now and I attended the public scoping meeting on August 14, 2018.

I want to share with you the reason that I moved to my home in Carson, by Victoria Park. I moved to this location because of its neighborhood. We are a family oriented community. We respect the street that we live on and we understand that our children feel safe playing outside on the street. We love that the community uses Victoria Park for family sports events and for leisure. For these reasons, I am very concerned about the enormous facility that the LA County is proposing to be built in our area.

You see, I think that the idea and the vision for this complex is great. I just do not feel that this is the correct location for this venue. Mrs. Kimmelman taught in South Central Los Angeles, and to house this facility in Carson is just not ideal for the members of the greater Los Angeles areas.

This type of facility would be better off in closer proximity to the city of Los Angeles, which is the "heart of Los Angeles" as Mr. Kimmelman stated in his video interview. I am an educator myself and I can tell you that the communities of underserved youths would love a place like this. However, no parent would be OK with busing their child to Carson for them to be dropped off at school after dark only to have their child walk home in tough neighborhoods. Underserved youth parents are concerned with providing meals and a safe shelter over their childrens' heads. So, I do not see them commuting in rush hour traffic on the 110, 405, and 91 freeways to come to this center in Carson only to return to the congested freeways in the evenings. It is simply just not ideal.

On that note, I have concerns with traffic. One, people will use apps to find short cuts to the center and will eventually make our residential streets unsafe for children to play in. Two, if USTA will bus students in, what will the traffic be like? What will the smog/pollution quality be like in our neighborhoods? Can the LA County contact Wayz and other driving direction companies to not use our Victoria Park residential coordinates as a route to the complex?

Another concern that I have is in regards to the learning center. What type of learning center will it be? Who will be funding this center? How long will this center be funded for? I am concerned that funding will be short and that services

will not be provided and then that's when empty lots become a crime magnet. What will the county do to mitigate this? Will the county work with the city to ensure safety and peace in the Victoria Park Community?

Moreover, another concern that I have is with the aesthetics. What is the parking lot going to be like? Will it be a large 2-5 stories high type of structure? A flat lot? Will you charge for parking? You see, if the county charges for parking then people will park on surface streets and take up parking spots for park visitors and residents. How will the county mitigate this? Will the county work with the city of Carson to suggest solutions such as residential parking permits? Is this something that the City of Carson will need to deal with? Also, we have the Stubhub and when there are events, there is a lot of traffic and street parking gets taken up by the football event goers leaving no parking for park visitors.

Additionally, this new sports complex will have a 1,200 seating capacity. What is this intention for this venue? Is it because the Olympics will be coming and this is a way to get ready for them? This venue is taking away the golf course that gets used on a daily basis by our retired community members and others for tennis courts and soccer fields that will probably not be used because this is a football and basketball type of community. There are already tennis courts adjacent to the golf course that NEVER get used. Now the LA County thinks it's a great idea to build an enormous tennis court area? What does that say to our community golfers? It's a terrible thing to do, to take away a facility that is already in use for another one that will need kids and people to be transported into to be used? With a venue this large, what is the county going to do to ensure community safety? There will possibly be over a thousand center goers and that is a large number for the Victoria Park Community. Our children play on the streets and if there are these many people walking around and driving, it poses a threat to our children's safety.

Also, what will a facility of this magnitude do for the residents of Carson, especially those in the Victoria Park Community? Will it impact our home values in a negative way? Will our home values vanish? These are important concerns to be researched and addressed.

Lastly, when and how will all of these concerns be addressed and/or answered?

Thank you for your time,

Yvette Diaz
Education Specialist
M.S., Sp. Ed.
Victoria Park Community Resident