

Draft

INLAND STAR

Initial Study/Mitigated Negative Declaration

Prepared for
City of Carson

February 2019



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Prepared for
City of Carson
Contact: Gena Guisar, Contract Planner
701 E Carson Street
Carson, CA 90745
310.830.7600
Gguisar@carson.ca.gov

February 2019

626 Wilshire Boulevard
Suite 1100
Los Angeles, CA 90017
213.599.4300
esassoc.com



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CHAPTER 1

Introduction

- 1. Project Title:** Inland Star Distribution Centers, Inc.
Carson, California Warehouse
Conditional Use Permit Application
- 2. Lead Agency Name and Address:** City of Carson
Community Development Department
701 E. Carson Street
Carson, CA 90745
- 3. Contact Person and Phone Number:** Gena Guisar, Contract Planner
(310) 952-1761
- 4. Project Location:** 2132-A East Dominguez Street
Carson, CA 90810
- 5. Project Sponsor's Name and Address:** Inland Star Distribution, Inc.
2132 East Dominguez Street
Carson, CA 90810
- 6. General Plan Designation(s):** Heavy Industrial
- 7. Zoning:** Manufacturing Heavy (M-H)

8. Description of Project:

The proposed project is a warehouse operation that stores regulated and non-regulated packaged chemicals and industrial materials for third party manufacturers and distributors. The proposed project is located in the City of Carson (City) and is currently operating without a Conditional Use Permit (CUP) issued by the City. Prior to occupancy by the applicant, the project site was improved with a warehouse facility, associated office/administrative facilities, loading docks and surface parking, which were constructed in or about 1989. The proposed project that is the subject of this Initial Study includes interior renovations and upgrades but does not include any expansion of the existing warehouse facility or loading dock, or any changes to the building exterior. The proposed project also included the installation of a redundant line, which was installed to provide a secondary water service line to the proposed project site in the event of an emergency and the main service line became inoperable. Although all improvements and upgrades for the proposed project were completed by December, 2015, this Initial Study analyzes these completed improvements and upgrades as part of the proposed project. The Applicant, Inland Star Distribution Centers, Inc. (Applicant), operates other facilities in California, including in Fresno and Visalia, and opened this facility in the City in October 2015. The existing

warehouse facility currently provides storage and distribution of various regulated and non-regulated packaged chemicals and industrial materials for third party manufacturers and distributors, such as American International, Eastman Chemical, and Lintech International. According to the Applicant, all chemicals and industrial materials arrive at the warehouse facility in packaging approved by the federal Department of Transportation (DOT), and remain in their original packaging while stored at the project site. The chemical materials are stored in pallet racking or floor stack schemes until shipped. The Applicant does not utilize the chemicals stored onsite and does not repackage any chemicals or materials, transfer materials from one container to another or open containers for any purpose.

9. Surrounding Land Uses and Setting. (Briefly describe the project’s surroundings.)

The proposed project site is located at 2132-A East Dominguez Street in the City of Carson. According to the City’s General Plan, Land Use Plan, the project site is designated as Heavy Industrial land use and it is zoned as Manufacturing – Heavy (M-H). The project site is bound by East Dominguez Street to the north, Alameda Street to the east, East Carson Street to the south, and South Wilmington Avenue to the west. The project site is located in a larger industrial park. Immediately adjacent to the project site on all sides are properties that support similar industrial and/or manufacturing uses. Similar to the project site, the surrounding land uses are also designated with Heavy Industrial land uses and are zoned as M-H. The closest residential land use is approximately 0.3 miles to the east and is separated from the project site by the Southern Pacific railroad right-of-way. Other sensitive receptors in the vicinity of the project site include residential areas west of South Wilmington Avenue, Dolphin Park and Del Amo Elementary School located approximately 0.5-miles to the west and residential areas east of Alameda Street located approximately 0.5-miles to the east of the project site. In addition, the City’s corporate yard, which serves as the City’s “Critical Response Team location”, is located approximately 0.4 miles to the east of the project site at 2400 East Dominguez Street.

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

The City will use this IS and supporting documentation to determine the appropriate CEQA document that will accurately disclose any potential environmental impacts of the proposed project. The Applicant has obtained permits and approvals from Los Angeles County Fire Department (LACFD), including permits for Flammable and Combustible Liquids, Hazardous Materials and High-Pile Storage per Los Angeles County Fire Code (Title 32). The LACFD also serves as the Certified Unified Program Agency (“CUPA”) and has issued permits for the proposed project under the Hazardous Materials Disclosure Program and the Hazardous Waste Generator Program, and has approved a Hazardous Materials Business Plan (HMBP), which includes an Emergency Action Plan, for the project, most recently in October 2018. In order for the proposed project to be approved and in compliance with the City’s Municipal Code, the Applicant would be required to obtain the following approvals:

- Issuance of a Conditional Use Permit to allow the storage of regulated and non-regulated chemicals on the site;
- Approval or certification of the appropriate CEQA document;

- Issuance of an Exception to Ordinance No. 18-1805, Interim Urgency Ordinance extending a moratorium on the establishment, expansion, or modification of truck yards, logistics facilities, hazardous materials or waste facilities, container storage, and container parking within the City of Carson for 12 months, and
- Issuance of a new Certificate of Occupancy following the approval of the Conditional Use Permit.

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?

The City notified the Gabrieleno Band of Mission Indians - Kizh Nation of the Project in May, 2018. On May 30, 2018, the Tribe indicated that no consultation would be necessary since no ground disturbance would occur.

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

DETERMINATION: (To be completed by the Lead Agency)

On the basis of this initial study:

- ☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- ☒ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- ☐ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- ☐ I find that the proposed project MAY have a “potentially significant impact” or “potentially significant unless mitigated” impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- ☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Signature

Date

Signature

Date

CHAPTER 2

Project Description

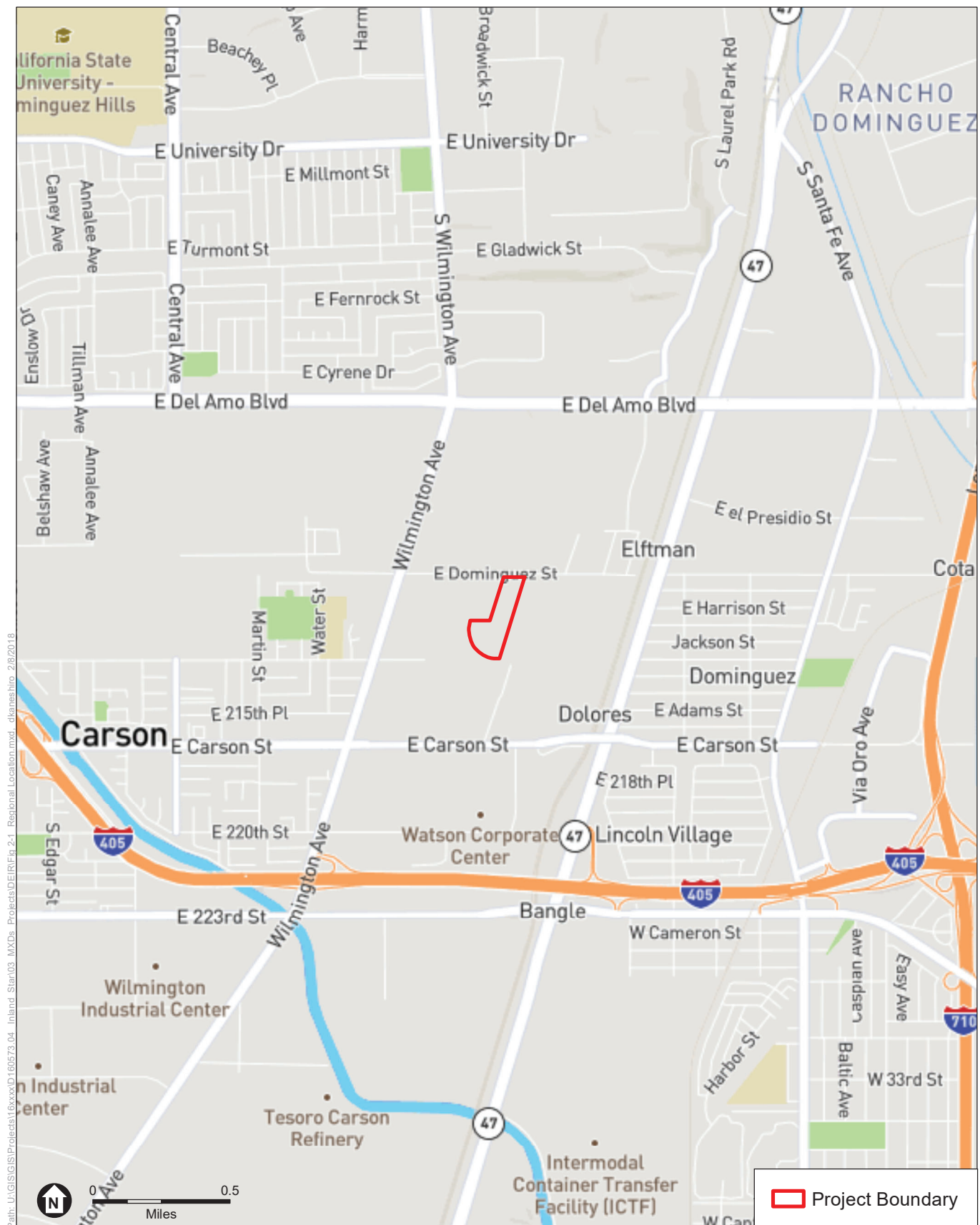
2.1 Project Overview

The proposed project is a warehouse operation that stores regulated and non-regulated packaged chemicals and industrial materials for third party manufacturers and distributors. The proposed project is located in the City of Carson (City) and is currently operating on the proposed project site without a Conditional Use Permit (CUP) issued by the City. The Applicant, Inland Star Distribution Centers, Inc. (Applicant), operates other facilities in California, including in Fresno and Visalia, and opened this facility in the City in October 2015. The existing warehouse facility currently provides storage and distribution of various regulated and non-regulated packaged chemicals and industrial materials for third party manufacturers and distributors, such as American International, Eastman Chemical, and Lintech International. All chemicals and industrial materials arrive at the warehouse facility in packaging approved by the federal Department of Transportation (DOT), and remain in their original packaging while stored at the project site. The chemical materials are stored in pallet racking or floor stack schemes until shipped. The Applicant does not engage in the blending, mixing, or formulating of chemicals onsite and would not repackage any chemicals or materials, transfer materials from one container to another or open containers for any purpose.

This Initial Study (IS) serves as the appropriate preliminary environmental documentation in accordance with the California Environmental Quality Act (CEQA) Guidelines to demonstrate the potential environmental impacts associated with the operation of the existing warehouse facility. Based on the findings of this IS, the City determined a Mitigated Negative Declaration (MND) would be the appropriate CEQA document for the proposed project.

2.2 Project Location

The proposed project site is located at 2132-A East Dominguez Street in the City of Carson, California (**Figure 2-1**). The project site is designated as Heavy Industrial land use and zoned as Manufacturing – Heavy (M-H). The project site is bound by East Dominguez Street to the north, Alameda Street to the east, East Carson Street to the south, and South Wilmington Avenue to the west. Immediately adjacent to the project site on all sides are properties that support similar industrial and/or manufacturing uses. Similar to the project site, the surrounding land uses are also designated with Heavy Industrial land uses and are zoned as M-H. The closest residential land use is approximately 0.3 miles to the east and is separated from the project site by the Southern Pacific railroad right-of-way. Other sensitive receptors in the vicinity of the project site include residential areas west of South Wilmington Avenue, Dolphin Park and Del Amo



SOURCE: OpenStreetMap, 2018

Inland Star

Figure 2-1
Regional Location

Elementary School located approximately 0.5-mile to the west and residential areas east of Alameda Street located approximately 0.5-miles to the east of the project site. In addition, the City's corporate yard, which serves as the City's "Critical Response Team location", is located approximately 0.4 mile to the east of the project site at 2400 East Dominguez Street.

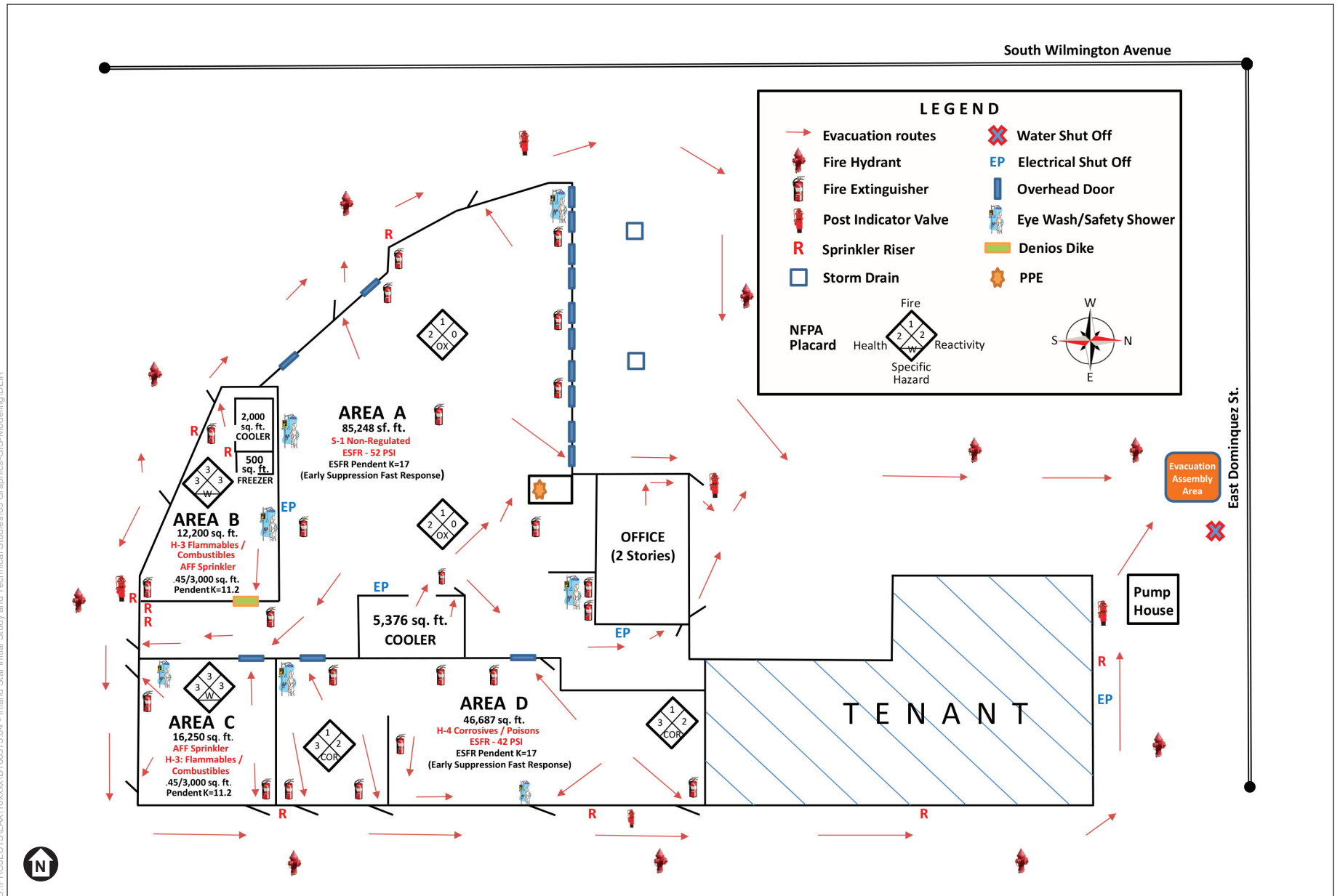
2.3 Project Background

The project site (2132-A East Dominguez Street) is located within a larger industrial warehouse complex that was originally constructed in 1989. The project site and the adjacent warehouse space (2132-B East Dominguez Street) served as a storage and distribution center for California Cartage Company, a third party logistics provider that supported Toys "R" Us, from approximately 2006 to 2013. The project site comprises a total of approximately 188,495 square feet (sf). The adjacent warehouse space, which is not affiliated with the proposed project and is not part of the project site, comprises a total of approximately 65,916 sf. The project site and the adjacent warehouse space together comprise approximately 254,411 s.f. and are one part of the larger industrial warehouse complex.

The Applicant previously operated, without any known chemical releases, at a similar facility in the Rancho Dominguez area of Los Angeles County (approximately 1.1 miles from the project site) from 2000-2015. In 2014 the Applicant entered into a lease for the project site and upgraded the warehouse facility with approximately \$4.5 million in retrofits to accommodate a packaged chemical warehouse operation in full compliance with the most current regulations. No additional square footage or loading docks were added. Facility upgrades included dividing the building into four segregated storage areas (A through D); each individual storage area functions as its own separate building. **Figure 2-2** shows the site plan of the existing warehouse facility. The project site includes approximately 168,261 sf of warehouse floor area, comprised of Area A (consisting of approximately 90,624 sf); Areas B and C (together consisting of approximately 30,950 sf); and Area D (consisting of approximately 46,687 sf). The four storage areas are classified by the 2013 Editions of the California Building Code (CBC) and the California Fire Code (CFC) as follows:

- Area A: Group S-1 occupancy for non-regulated (non-hazardous) material and materials under the Maximum Allowable Quantity permitted by the CBC;
- Areas B & C: Group H-3 occupancy for primarily flammable and combustible liquids and flammable solids; and
- Area D: Group H-4 occupancy for corrosive and toxic materials.

Each area within the existing warehouse facility is used to store a different class of regulated and non-regulated chemicals; specifically, Area A is used to store Group S-1 materials, Areas B and C are used to store Group H-3 materials, and Area D is used to store Group H-4 materials.



SOURCE: Inland Star Distribution Centers, 2018

Inland Star

Figure 2-2
Project Site

The four segregated areas in the existing warehouse facility comprise four distinct buildings under the CBC, each of which are diked for containment. Each area is separated from the other by three hour rated fire walls and are constructed in accordance with CBC Section 706, which regulates the design and construction of fire walls. All wall openings for employee and product passage are provided with automatic-closing Underwriters Laboratories Listed fire doors in accordance with CBC Section 716, which regulates the design and construction of opening protectives. Under the CBC, the design and construction of the doors is such, to allow each area to be considered its own separate fire area/building and contain and prevent the spread of a fire from one area to another.

Since the warehouse facility is used to store flammable and/or combustible chemicals, the upgrades were developed in consultation with an independent fire and risk expert in order to establish the maximum safety precautions. Each of the four areas has a distinct fire suppression system, specific to the types of materials stored in that area. The installed safety measures also include a 2,500 gallons per minute (gpm) firewater booster pump, a second water service line to provide a redundant water service to the project site in the event the main service line and/or the supplemental water pressure pump fails, and fire suppression/extinguishing sprinkler systems throughout the building, including foam-water sprinkler systems in the Group H-3 areas. An early suppression fast response (ESFR) system was installed in portions of the warehouse building. The Los Angeles County Fire Department (LACFD) has inspected, approved and issued permits for Flammable and Combustible Liquids, Hazardous Materials and High-Pile Storage per Los Angeles County Fire Code (Title 32).

In addition, the Applicant has prepared and submitted to the Los Angeles County Fire Department, Health Hazardous Materials Division, a Hazardous Material Business Plan (HMBP) for the project site, which provides basic information necessary for use by first responders in order to prevent or mitigate damage to public health and safety and/or to the environment from the release of a hazardous material.

2.4 Project Operations

The proposed project involves the request for issuance of a CUP from the City for the storage of high-piled hazardous materials at an existing warehouse facility by the Applicant. The existing warehouse facility is currently operating without a City issued CUP. The existing warehouse facility provides storage and distribution of various regulated and non-regulated packaged chemicals and industrial materials for third party manufacturers and distributors. The proposed project is the current operations and would require no additional construction activity. The Applicant would not engage in the blending, mixing, or formulating of chemicals onsite and would not repackage any chemicals or materials, transfer materials from one container to another or open containers for any purpose. All chemicals and industrial materials arrive at the warehouse facility in packaging approved by the federal DOT, and remain in their original packaging while stored at the project site. The chemical materials are stored in pallet racking or floor stack configurations. The warehouse facility operates between 7:30 a.m. to 5:30 p.m. Monday through Friday. The warehouse facility currently employs approximately 19 employees comprised of customer service representatives, warehouse specialists, supervision, and management.

Chemical Inventory

The warehouse facility serves as a type of “middleman” operation for the storage and distribution of small-scale quantities for third party manufacturers and distributors. Due to this type of operation, the inventory of chemicals that are present onsite is constantly changing due to supply and demand for different products. While the types of regulated and non-regulated chemicals stored onsite depends on the week, the Applicant has specified that generally the same chemicals are typical of the facility’s inventory; refer to Appendix E for the full list of chemicals stored per Area in the warehouse facility.

Routes for Transport and Deliveries

Trucks and vans would transport the chemical materials to- and from- the site primarily utilizing East Dominguez Street, Alameda Street, East Carson Street, and South Wilmington Avenue, as well as Interstate 405.

Preventative and Emergency Safety Plans

The Applicant has prepared and implements various preventative and emergency safety plans for the facility, including the following:

- **Corrective and Prevention Action Plan:** outlines the procedures for investigating an existing or potential non-conformity in order to identify the root cause(s) of non-conformities in order to prevent recurrence.
- **Record Retention Plan:** provides a system and instructions for the identification, storage, protection, retrieval, retention and disposition of records.
- **U.S. Environmental Protection Agency (EPA) Waste Reporting and Waste Management Procedure:** defines the Applicant’s role and responsibility as a “generator” in managing material that has been designated “waste” per EPA guidelines.
- **Various Employee Work Plans:**
 - Reporting Work Related Accidents
 - Personal Protection Equipment Requirements
 - Forklift Certifications
- **Inventory Control Policy (ICP):** Provides a system for reviewing customer storage requests prior to acceptance in order to ensure compliance with applicable regulations and company policies. Among other things, the ICP provides a mechanism for ensuring that Inland Star does not accept any substances regulated under the California Accidental Release Program (“CalARP”).
- **Emergency Action Plan (“EAP”):** Provides provide for the protection of employees and the surrounding community.
- **Inland Star implements standards set by the American Chemistry Council's Responsible Care Management System process, the Chemical Process Safety Institute of Chemical Engineers, and the National Association of Chemical Distributors for Responsible Distribution.**

2.5 Project Approvals and Discretionary Actions

The City will use this IS and supporting documentation to determine the appropriate CEQA document that will accurately disclose any environmental impacts of the proposed project. As discussed above, the Applicant has obtained permits and approvals from LACFD, including permits for Flammable and Combustible Liquids, Hazardous Materials and High-Pile Storage per Los Angeles County Fire Code (Title 32). In order for the proposed project to be approved and in compliance with the City's Municipal Code, the Applicant would be required to obtain the following approvals:

- Issuance of a Conditional Use Permit to allow the storage of regulated and non-regulated chemicals on the site;
- Approval or certification of the appropriate CEQA document; and

CHAPTER 3

Environmental Checklist

Aesthetics

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
I. AESTHETICS — Except as provided in Public Resources Code Section 21099, would the project:				
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Create a new source of substantial light or glare which would adversely affect daytime or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

- a) The project site is currently developed with an existing warehouse facility that receives, stores, and ships various regulated and non-regulated packaged chemicals and industrial materials for third party manufactures and distributors. Project implementation would result in a significant impact if the proposed action developed structures that permanently obstruct or are visually incompatible with a scenic vista. The project site is within an established industrial area and is not within or proximate to a scenic vista. Furthermore, the proposed project consists solely of a request for approval of the Conditional Use Permit (CUP) for the storage of hazardous materials in an existing warehouse facility. Implementation of the proposed project would not involve the demolition, construction, or any other alterations to the project site. Therefore, no impact would occur.
- b) Project implementation would result in a significant impact if the proposed action would substantially damage scenic resources within a State Scenic Highway. According to the California Department of Transportation (Caltrans), there are no Officially Designated State or County Scenic Highways as defined by Caltrans, the County of Los Angeles, or any other local governing body adjacent to or within the vicinity of the project site

- (Caltrans, 2011). Additionally, the proposed project would not involve the demolition, construction, or any other alterations to the project site. Therefore, no impact to scenic resources would occur.
- c) Project implementation would result in a significant impact if the proposed action would substantially degrade the existing visual character or quality of the project site and its surroundings. The project site is within an existing building that is designated and zoned for industrial manufacturing and warehousing uses, in an established industrial area. No modifications or new development activities are proposed under the proposed project. Therefore, no impact would occur to the existing visual character or quality of the project site.
- d) A significant impact would occur if light and glare substantially interfered with off-site activity. The project site is located within an existing developed site and is located within a larger industrial park dedicated to logistic uses which includes security booths and way-finding lighting typical of this use type. No new light sources are included as part of the project. The facility currently operates from 7:30 am to 5:30 pm, Monday through Friday. The light sources required to serve the project are existing. There are no viewsheds or sensitive uses that could be affected by light or glare at the project site, and thus, no impacts would occur.

References

California Department of Transportation (Caltrans). California Scenic Highway Mapping System. September 2011. Accessed: March 2018. Available at:
http://www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways/index.htm

Agriculture and Forestry Resources

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
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"/>
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"/>

Discussion

- a) A significant impact would occur if the proposed project would convert valued farmland to non-agricultural uses. The project site is located within the City of Carson and is currently developed with an existing warehouse facility that receives, stores, and ships various regulated and non-regulated packaged chemicals and industrial materials for third party manufactures and distributors. No agricultural uses or related operations are present on the project site or in the surrounding highly urbanized area. Furthermore, the project site is not located on designated Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program (CDC, 2018). Therefore, no impact would occur from conversion of valued farmland to non-agricultural uses.

- b) Project implementation would result in a significant impact if the proposed action conflicted with existing agricultural zoning or agricultural parcels enrolled under the Williamson Act. The project site is designated as Heavy Industrial in the City of Carson's General Plan Land Use Map with a corresponding zoning of MH (Manufacturing, Heavy) (Carson, 2014 General Plan). As discussed above, the project site is within an established industrial park in an urbanized area. No agricultural zoning is present in the Project vicinity, and no nearby lands are enrolled under the Williamson Act (CDC, 2016). As such, the Project would not conflict with existing zoning for agricultural uses or a Williamson contract, there would be no impacts and no mitigation measures are required.
- c) Project implementation would result in a significant impact if the proposed action conflicted with existing zoning for, or caused rezoning of forestland or timberland. As discussed previously, the project site is zoned MH and is designated as Heavy Industrial on the City of Carson's General Land Plan Land Use Map (City of Carson 2004). The project site is currently developed with an existing warehouse facility, associated office/administrative facilities, loading docks, and surface parking. Furthermore, the project is located within a larger logistics campus and consistent with the urbanized area surrounding the project site, the larger Project vicinity is zoned for industrial and manufacturing uses. No forestland or timberland uses are located in the project site's urban, industrial setting. Therefore, no impact would occur to zoning for forestland or timberland.
- d) A significant impact would occur if the proposed project resulted in the loss of forestland or in the conversion of forestland to non-forest use. The project site is currently developed with an existing warehouse facility, associated office/administrative facilities, loading docks, and surface parking. Furthermore, the project is located within a larger logistics campus and consistent with the urbanized area surrounding the project site, the project and surrounding vicinity is zoned for and developed with industrial and manufacturing uses. No forestland or timberland uses are located at the project site or within the surrounding urban, industrial setting. Therefore, no impact would occur to forestland or timberland.
- e) Project implementation would result in a significant impact if the proposed action caused the conversion of farmland to non-agricultural use. As discussed above, the proposed project would not involve changes to the existing industrial environment which could result in the conversion of farmland or forestland and there are no farmland uses on or proximate to the project site. Therefore, no impact would occur from a conversion of farmland to a non-agricultural use.

References

California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program, Los Angeles County Important Farmland Map 2014. Available at: <ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2014/los14.pdf>. Accessed on December 1, 2016.

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County Williamson Act Map FY 2015/2016. Available at:
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Air Quality

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
III. AIR QUALITY — Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Result in other emissions (such as those leading to odors adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion

a) **Regulatory Background**

The proposed project is located within the 6,745-square-mile South Coast Air Basin (SoCAB). Air quality planning for the SoCAB is under the jurisdiction of the South Coast Air Quality Management District (SCAQMD). The SCAQMD has adopted a series of Air Quality Management Plans (AQMP) to meet the California Ambient Air Quality Standards (CAAQS) and National Ambient Air Quality Standards (NAAQS) for criteria air pollutants. The SCAQMD is required, pursuant to the Clean Air Act, to reduce emissions of criteria pollutants for which the SCAB is in non-attainment for the NAAQS (e.g., ozone [O₃], and particulate matter 2.5 microns in diameter or less [PM_{2.5}]). The SCAQMD, California Air Resources Board (CARB), and United States Environmental Protection Agency (USEPA) have adopted a series of AQMPs to meet the CAAQS and NAAQS. The most recent version is the 2016 AQMD, as it was adopted by the SCAQMD Governing Board on March 3, 2017. However, at the time of the project, the 2012 AQMP, adopted in December 2012, was the approved version. The 2012 AQMP which incorporates scientific and technological information and planning assumptions, regarding air quality, including the Southern California Association of Governments (SCAG) 2012 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), and emission inventory methodologies for various source categories (SCAQMD 2013). The AQMP builds upon other agencies' plans to achieve federal standards for air quality in the SCAB and incorporates a comprehensive strategy aimed at controlling pollution from all sources, including stationary sources, and on-road and off-road mobile sources. In addition, the AQMP highlights the significant amount of emission reductions needed and the urgent need to identify additional strategies, especially for mobile sources, to meet all federal criteria pollutant standards in accordance with the Clean Air Act.

The AQMP contains a comprehensive list of pollution control strategies directed at reducing emissions and achieving the NAAQS. These strategies are developed, in part, based on regional growth projections prepared by the SCAG. As part of its air quality planning, SCAG has prepared the Regional Comprehensive Plan (RCP) and Guide and the RTP/SCS, these plans provide the basis for the land use and transportation components of the AQMP and are used in the preparation of the air quality forecasts and the consistency analysis included in the AQMP. Both the RCP and AQMP are based, in part, on projections originating with county and city general plans.

The 2012 AQMP was prepared to accommodate growth, reduce the high levels of pollutants within the areas under the jurisdiction of SCAQMD, return clean air to the region, and minimize the impact on the economy. Projects that are consistent with the assumptions used in the AQMP do not interfere with attainment because growth is included in the projections utilized in the formulation of the AQMP. Thus, projects, uses, and activities that are consistent with the applicable growth projections and control strategies used in the development of the AQMP would not jeopardize attainment of the air quality levels identified in the AQMP, even if it were individually exceed the SCAQMD's numeric indicators.

Construction

As discussed above, the proposed project utilizes an existing warehouse and loading dock and does not include any expansion of these facilities. Construction of the proposed project's improvements and upgrades was separated into two phases; the water pipeline installation associated with the pump house and the facility renovations completed inside the warehouse. Construction activities associated with the water pipeline consisted of trenching a new water line from the main line on E. Dominguez Street to the newly constructed pump house and then to the main warehouse. Construction activities associated within the facility included erecting 3-hour fire wall panels to construct individual storage rooms. Construction activities associated with the proposed project have the potential to generate temporary criteria pollutant emissions through the use of heavy-duty construction equipment, such as excavators and compactors, and through vehicle trips generated from worker trips, vendor and haul trucks traveling to and from the proposed project area. In addition, fugitive dust emissions resulting from removal of hardscape and soil handling activities during installation of the new water pipeline. Mobile source emissions, primarily oxides of nitrogen (NO_x), would result from the use of construction equipment such as dozers and loaders. Construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of construction activity, and prevailing weather conditions. The assessment of construction air quality impacts considers each of these potential sources.

Construction of the proposed project may have resulted in an increase in short-term employment compared to existing conditions. Being relatively small in number (a maximum of 20 workers per day) and temporary in nature, the construction jobs under the proposed project did not conflict with the long-term employment projections upon which the AQMP is based. Control strategies in the AQMP with potential applicability to

short-term emissions from construction activities include strategies denoted in the as MOB-08 and MOB-10 in the 2016 AQMP, which are intended to reduce emissions from on-road and off-road heavy-duty vehicles and equipment by accelerating replacement of older, emissions-prone engines with newer engines meeting more stringent emission standards. The proposed project complied with CARB requirements to minimize short-term emissions from on-road and off-road diesel equipment.

Fugitive dust generation was confined to the installation of a redundant water line and fire pump. Although the amount of soil and asphalt disturbed was small, the proposed project was required to comply with SCAQMD regulations for controlling fugitive dust pursuant to SCAQMD Rule 403.

Compliance with these requirements is consistent with and met the AQMP requirements for control strategies intended to reduce emissions from construction equipment and activities. Because the proposed project did not conflict with the control strategies intended to reduce emissions from construction equipment, construction of the proposed project did not conflict with or obstruct implementation of the AQMP, and impacts are less than significant.

Operation

The 2016 AQMP was prepared to accommodate growth, reduce the levels of pollutants within the areas under the jurisdiction of SCAQMD, return clean air to the region, and minimize the impact on the economy. Projects that are considered consistent with the AQMP would not interfere with attainment because this growth is included in the projections used in the formulation of the AQMP.

The proposed project is a hazardous materials storage facility. The existing warehouse facility provides storage and distribution of various regulated and non-regulated packaged chemicals and industrial materials for third party manufacturers and distributors. SCAG predicted Carson's employment growth between 2012 and 2040 to be 11,200 jobs (SCAG, 2012). The estimated 17 new full-time-equivalent (FTE) employees generated by the proposed project are well within SCAG's employment growth assumptions for Carson. During each operation day, the proposed project has a maximum of 309 mobile sources, which would include up to 47 AM peak hour trips to drop off and/or pickup products from the site, 92 PM peak hour trips to drop off and pick up products, employee trips, and other miscellaneous vehicle trips.¹ As discussed in Issue 17, Transportation and Traffic, this project does not have a significant impact on transportation or traffic in the project vicinity. However, the number of daily truck trips and vehicle miles traveled from those trucks do have the potential to result in operational emissions. Mobile source emissions associated with the proposed project site were calculated and will be discussed in Issue 3 (b) below.

¹ Fehr & Peers, Inland Star, Transportation Impact Analysis, April 16, 2018. Note the trip counts here are actual vehicle trips, they are different from the passenger car equivalent (PCE) trip rates as presented in the transportation and traffic section, one truck trip is equivalent to 2.5 passenger car trips.

- b) The SoCAB is currently designated as extreme non-attainment for the federal and state ozone ambient air quality standards and non-attainment for the state PM10 and federal and state PM2.5 ambient air quality standards. The SCAQMD's approach for assessing cumulative impacts related to operations is based on attainment of ambient air quality standards in accordance with the requirements of the federal and State Clean Air Acts. As discussed above, the SCAQMD has developed a comprehensive plan, the 2012 AQMP, which addresses the region's cumulative air quality condition.

A significant impact may occur if a project were to add a cumulatively considerable contribution of a federal or State non-attainment pollutant. Because the SCAB is currently in non-attainment for ozone, PM10 and PM2.5, related projects could cause ambient concentrations to exceed an air quality standard or contribute to an existing or projected air quality exceedance. Cumulative impacts to air quality are evaluated under two sets of thresholds for CEQA and the SCAQMD. In particular, CEQA Guidelines Sections 15064(h)(3) provides guidance in determining the significance of cumulative impacts. Specifically, Section 15064(h)(3) states in part that:

A lead agency may determine that a project's incremental contribution to a cumulative effect is not cumulatively considerable if the project will comply with the requirements in a previously approved plan or mitigation program which provides specific requirements that will avoid or substantially lessen the cumulative problem (e.g., water quality control plan, air quality plan, integrated waste management plan) within the geographic area in which the project is located. Such plans or programs must be specified in law or adopted by the public agency with jurisdiction over the affected resources through a public review process to implement, interpret, or make specific the law enforced or administered by the public agency...

For purposes of the cumulative air quality analysis with respect to CEQA Guidelines Section 15064(h)(3), the project's incremental contribution to cumulative air quality impacts is determined based on compliance with the SCAQMD adopted 2012 AQMP. The 2012 AQMP includes demographic growth forecasts for various socioeconomic categories (e.g. population, housing, employment), developed by SCAG for their 2012 Regional Transportation Plan (RTP). As discussed under Issue 3(a), above, the project would be consistent with the 2012 AQMP.

As the proposed project is not part of an ongoing regulatory air program under the air district or other local agency, the SCAQMD also recommends that project-specific air quality impacts be used to determine the potential cumulative impacts to regional air quality. As discussed above, peak daily emissions of operation-related pollutants do not exceed SCAQMD regional significance thresholds. By applying SCAQMD's cumulative air quality impact methodology, implementation of the project would not result in the addition of criteria pollutants such that cumulative impacts would occur, in conjunction with related projects in the region. In addition, as discussed in Issue 3 (b) above and Issue 3 (d) below, construction of the project is not expected to result in a cumulatively considerable net increase of criteria pollutants for which the SCAQMD has established a

- regional and localized impact threshold. Therefore, the project impacts would be considered less than significant.
- c) As indicated above, the proposed project area is located within the SoCAB, which is characterized by relatively poor air quality. State and federal air quality standards are often exceeded in many parts of the SoCAB. The proposed project contributes to local and regional air pollutant emissions during construction (short-term or temporary) and project occupancy (long-term). Based on the following analysis, construction and operation of the project resulted in less than significant impacts relative to the daily significance thresholds for criteria air pollutant emissions as established by the SCAQMD for construction and operational phases (SCAQMD 2015), as the project would not exceed these thresholds.

Construction Emissions

Daily regional and annual construction source project criteria pollutant emissions (NO_x , volatile organic compounds [VOC], particulate matter 10 microns in diameter or less [PM₁₀], PM_{2.5}, sulfur oxides [SO_x], and carbon monoxide [CO]) were calculated using the CalEEMod (Version 2016.3.2) software, an emissions inventory software program recommended by the SCAQMD. The model also calculates GHG emissions from direct and indirect sources and quantifies applicable air quality and GHG reductions achieved from mitigation measures. CalEEMod is based on outputs from OFFROAD and EMFAC, which are emissions estimation models developed by CARB and used to calculate emissions from construction activities, including on- and off-road vehicles and statewide and regional emissions inventories from all motor vehicles, including passenger cars to heavy-duty trucks, operating on highways, freeways, and local roads in California. The input values used in the CalEEMod modeling analysis were adjusted based on project specific information.

Construction activities associated with the proposed project resulted in emissions of CO, VOCs, NO_x , SO_x , PM₁₀, and PM_{2.5}. Construction related emissions were calculated based on the excavating, trenching, paving, internal building construction, and construction worker, haul truck, and vendor truck trips completed during the site improvements. Construction commenced as early as January 1, 2015 and lasted through the year. Construction was accomplished in two phases: 1) water pipeline installation associated with the fire house, and 2) facility renovations completed inside the warehouse. The construction phases and duration are provided in **Table 1**. The construction schedule utilized in the Air Quality Impact Analysis represents a “worst-case” scenario. The duration of construction activity and associated equipment represents a reasonable approximation of the expected construction fleet as required per CEQA guidelines. The duration of construction activity and associated construction equipment was estimated based on consultation with the project applicant. A detailed summary of construction equipment assumptions for all phases is provided in **Table 2**. Air modeling emission results are provided in Appendix A, *Inland Star Air Quality Emissions Calculations*.

TABLE 1
ESTIMATED CONSTRUCTION SCHEDULE

Activity	Start Date	End Date	Duration (Days)
Water Pipeline	01/01/2015	03/31/2015	63
Facility Renovations	01/01/2015	12/31/2015	261

SOURCE: ESA 2019.

TABLE 2
CONSTRUCTION EQUIPMENT ASSUMPTIONS

Equipment	Horsepower	Load Factor
Concrete/Industrial Saws	81	0.73
Excavators	158	0.38
Skid Steer Loaders	65	0.37
Aerial Lifts	63	0.31
Concrete/Industrial Saws	81	0.73
Excavators	158	0.38
Forklifts	89	0.20
Tractors/Loaders/Backhoes	97	0.37
Welders	46	0.45

SOURCE: ESA 2019.

The estimated maximum daily construction emissions are summarized on **Table 3**. Maximum daily emissions are calculated by taking the sum of the overlapping phases for each criteria pollutant. Under the assumed scenarios, emissions resulting from the project construction would not exceed any criteria pollutant thresholds established by the SCAQMD. Therefore, impacts would be considered less than significant.

TABLE 3
MAXIMUM DAILY REGIONAL CONSTRUCTION EMISSIONS

Construction Phase	Emissions (pounds per day)^a					
	VOC	NO_x	CO	SO_x	PM10^b	PM2.5^b
Water Pipeline	3	26	21	<1	2	2
Facility Renovations	3	26	21	<1	2	2
Project Total	6	52	42	<1	4	3
SCAQMD Regional Significance Thresholds	75	100	550	150	150	55
Exceeds Thresholds?	No	No	No	No	No	No

^a Totals may not add up exactly due to rounding in the modeling calculations. Detailed emissions calculations are provided in Appendix A, *Inland Star Air Quality Emissions Calculations*.

^b Emissions include fugitive dust control measures consistent with SCAQMD Rule 403.

SOURCE: ESA, 2019; SCAQMD LST Appendix C, October 2009.

Operational Emissions

The proposed project is a hazardous materials storage/operations facility that provides the storage and distribution of various regulated and non-regulated packaged chemicals and industrial materials for third party manufacturers and distributors. All chemicals and industrial materials arrive at the warehouse facility by third party drivers. The materials arrive in pre-packaged containers that are approved by the federal Department of Transportation (DOT). The materials remain in their original packaging while stored at the project site and are stored in pallet racking or floor stack schemes until shipped. The products are moved within the facility via propane forklifts. During operation of the project, the primary emission sources would consist of mobile sources, energy use from site operations, testing and maintenance of the emergency generator associated with the fire pump, and routine maintenance of facilities.

Mobile sources associated with delivery and pickup of the materials were identified by the following classifications: heavy-heavy-duty (HHD), Light-heavy-duty (LHD), and medium-heavy-duty (MHD) trucks (IS, 2017). Operation of the site varies from day to day without advanced notice. Trip generation estimates were based on a review of truck activity during their busiest months, July to September. On a typical day with the site fully utilized, approximately 55 trucks enter and exit the project site with the purpose of either delivering bulk materials to the site or for distributing small batch quantities of materials to clients. Of the 55 vehicle trips, 15 trips occur during the AM peak hour, and 40 trips occur during the PM peak hour. Therefore, operation of the proposed project would generate a maximum of 110 daily truck trips (i.e., 15 AM peak hour trips and 40 PM peak hour trips) and 34 employee vehicle trips (i.e., 17 inbound trips and 17 outbound trips). Mobile source emissions were calculated based on the number of truck and vehicle trips per day and the estimated distance for each truck and vehicle trip. Truck destination and/or origination locations vary and are categorized into three areas; the ports of Los Angeles and/or Long Beach, intrastate, or interstate (California/Arizona) border. Trucks would travel an average distance of approximately 7,160 miles per day, while employees were assumed to travel approximately 20 miles, based on CalEEMod modeling assumptions. Air emission modeling results are provided in Appendix A, *Inland Star Air Quality Emissions Calculations*.

Operational-source emissions are summarized in **Table 4**. As shown, air emissions from the operation of the project are below the applicable SCAQMD regional thresholds of significance. Therefore, impacts would be considered less than significant.

TABLE 4
SUMMARY OF REGIONAL PEAK DAILY OPERATIONAL EMISSIONS ^A

Operational Activities	Emissions (pounds per day)					
	VOC	NO _x	CO	SO _x	PM10	PM2.5
Area	4	<1	<1	<1	<1	<1
Energy (Natural Gas)	<1	<1	<1	<1	<1	<1
Mobile (Employees)	<1	<1	3	<1	<1	<1

Operational Activities	Emissions (pounds per day)					
	VOC	NO _x	CO	SO _x	PM10	PM2.5
Mobile (Heavy-Duty Trucks)	2	25	15	<1	4	1
Fire Pump	<1	1	<1	<1	<1	<1
Forklifts	1	8	5	<1	1	1
Maximum Daily Emissions	7	34	23	<1	5	2
SCAQMD Significance Thresholds	55	55	550	150	150	55
Exceeds Thresholds?	No	No	No	No	No	No

^a Totals may not add up exactly due to rounding in the modeling calculations.

SOURCE: ESA 2018.

The localized effects from the on-site portion of the emissions are evaluated at nearby sensitive receptor locations potentially impacted by the Proposed Action according to the SCAQMD's Localized Significance Threshold Methodology (June 2003, revised July 2008), which relies on on-site mass emission rate screening tables and project-specific dispersion modeling typically for sites greater than five acres, as appropriate (SCAQMD 2008). The localized significance thresholds are applicable to NO_x, CO, PM10, and PM2.5. For NO_x and CO, the thresholds are based on the ambient air quality standards. For PM10 and PM2.5, the thresholds are based on requirements in SCAQMD Rule 403 (Fugitive Dust) for construction and Rule 1303 (New Source Review Requirements) for operations. The SCAQMD has established screening criteria that can be used to determine the maximum allowable daily emissions that would satisfy the localized significance thresholds and therefore not cause or contribute to an exceedance of the applicable ambient air quality standards without project-specific dispersion modeling. The screening criteria depend on: (1) the area in which the project is located, (2) the size of the project area, and (3) the distance between the project area and the nearest sensitive receptor (e.g., residences, schools, hospitals). For the project, the appropriate Source Receptor Area (SRA) for the localized significant threshold (LST) is the South Coast Los Angeles County monitoring station (SRA 4). Since the total acreage disturbed is approximately 2 acres (less than five acres) per day, SCAQMD's screening look-up tables were used to determine localized significance thresholds.

The nearest sensitive receptor is the residential community located more than 1,700 feet (213 meters) to the southwest of the project area at the corner of 213th Street and Wilmington Avenue. Additional residences are located approximately 2,100 feet (640 meters) to the east along Alameda Street and separated from the project site by the Southern Pacific railroad right-of-way. SCAQMD's Methodology clearly states that "off-site mobile emissions from the project should not be included in the emissions compared to LSTs." Therefore, for purposes of the LST analysis, only emissions included in the CalEEMod "on-site" emissions outputs were considered, plus the truck idling emissions (e.g., haul trucks and vendor trucks) that were calculated separately using the EMFAC emission factors for heavy-heavy-duty (HHD) vehicles. A conservative approach was

used to determine the significance thresholds for the project site. Therefore, the significant thresholds were linearly interpolated from the LST's 1-acre threshold values for a 25-meter receptor distance. If the project's localized daily emissions exceed the applicable LSTs from the screening look-up tables, it does not necessarily mean that the project impact is significant. Rather, refined dispersion modeling should be conducted to compare the project impact to the concentration-based localized significance thresholds.

Construction Emissions

Table 5 identifies the localized impacts at the nearest receptor location in the vicinity of the project area. The localized emissions during construction activity would not exceed any of the SCAQMD's localized significance thresholds. Therefore, impacts would be considered less than significant.

TABLE 5
LOCALIZED SIGNIFICANT SUMMARY - CONSTRUCTION

Construction Activities	Emissions (pounds per day) ^a			
	NO _x	CO	PM ₁₀ ^b	PM _{2.5} ^b
Water Pipeline	23	17	1	1
Facility Renovations	22	17	2	1
Maximum Daily Emissions	45	35	3	3
SCAQMD LST Thresholds^c	57	585	4	3
Exceed Threshold?	No	No	No	No

^a Totals may not add up exactly due to rounding in the modeling calculations. Detailed emissions calculations are provided in Appendix A, *Inland Star Air Quality Emissions Calculations*.

^b Emissions include fugitive dust control measures consistent with SCAQMD Rule 403.

^c The SCAQMD LSTs are based on Source Receptor Area 4 (Central Coastal LA County) for a 1-acre site within a 25-meter receptor distance for construction activities.

SOURCE: ESA, 2018; SCAQMD LST Appendix C, October 2009.

Operational Emissions

According to SCAQMD LST methodology, LSTs would apply to the operational phase of a proposed project, if the project includes stationary sources, or attracts mobile sources that may queuing and idle at the site (e.g., warehouse or transfer facilities). With regard to on-site sources of emissions, the project would generate emissions resulting from trucks queuing and idling at the site. VOCs could emit from onsite equipment such as forklifts utilized inside the warehouse and the emergency generator, but LSTs are not applicable to VOCs emissions, which would contribute to regional ozone in the SCAB.

Table 6 summarizes the maximum localized operational emissions resulting from project operations, along with the localized significance thresholds. As shown, on-site daily emissions from operational activities do not exceed the SCAQMD localized thresholds and would not be expected to result in ground level concentrations that exceed the allowable incremental increase established by the SCAQMD. Therefore, the project results in a less than significant localized impact for operational emissions.

TABLE 6
MAXIMUM LOCALIZED OPERATIONAL EMISSIONS A

Operational Activity	NO _x	CO	PM10	PM2.5
Area	<1	<1	<1	<1
Energy (Natural Gas)	<1	<1	<1	<1
Fire Pump	1	<1	<1	<1
Forklifts	8	5	0.65	0.60
Maximum Daily Emissions	9	6	0.69	0.64
SCAQMD Significance Thresholds^b	57	585	1	1
Exceeds Thresholds?	No	No	No	No

^a Totals may not add up exactly due to rounding in the modeling calculations.

^b The SCAQMD LSTs are based on Source Receptor Area 4 (Central Coastal LA County) for a 1-acre site within a 25-meter receptor distance for operational activities.

SOURCE: ESA, 2018; SCAQMD LST Appendix C, October 2009.

CO “Hot Spot” Analysis

A carbon monoxide (CO) hotspot is an area of localized CO pollution that is caused by severe vehicle congestion on major roadways, typically near intersections. Projects may worsen air quality if they increase the percentage of vehicles in cold start modes by two percent or more; significantly increase traffic volumes (by five percent or more) over existing volumes; or worsen traffic flow, defined for signalized intersections as increasing average delay at intersections operating at Level of Service (LOS) E or F or causing an intersection that would operate at LOS D or better without the proposed project, to operate at LOS E or F. While construction-related traffic on the local roadways occurred during construction, the net increase of construction worker vehicle trips to the existing daily traffic volumes on the local roadways was relatively small and would not result in CO hotspots. Additionally, the construction-related vehicle trips were short-term, and ceased once construction activities were completed. During operation, the project adds a total of 309 PCE trips to the project site per day. Overall, it is unlikely that local intersections will form a CO hotspot in comparison to the AQMP’s 2003 study, which estimates 100,000 vehicles per day will cause the formation of a CO hotspot. Therefore, impacts are considered less than significant.

Toxic Air Contaminants

Concentrations of toxic air contaminants (TACs), or in federal parlance, hazardous air pollutants (HAPs), are also used as indicators of ambient air quality conditions. A TAC is defined as an air pollutant that may cause or contribute to an increase in mortality or in serious illness, or that may pose a hazard to human health. TACs are usually present in minute quantities in the ambient air; however, their high toxicity or health risk may pose a threat to public health even at low concentrations.

Construction

Intermittent construction activities associated with the proposed project would result in short-term emissions of diesel particulate matter, which the State has identified as a TAC. During construction, the exhaust of off-road heavy-duty diesel equipment would emit diesel particulate matter during general construction activities, such as demolition, excavation, installation of machinery, materials transport and handling, and building construction.

Diesel particulate matter poses a carcinogenic health risk that is generally measured using an exposure period of 30 years for sensitive residential receptors, according to the California Environmental Protection Agency, Office of Environmental Health Hazard Assessment (OEHHA) *Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments* (OEHHA Guidance), which was updated in 2015 with new exposure parameters including age sensitivity factors (OEHHA 2015). Sensitive receptors are located to the southwest and east of the project area; however, localized diesel particulate matter emissions (strongly correlated with PM_{2.5} emissions) are minimal and are below localized thresholds as presented in Table 5. Although the localized analysis does not directly measure health risk impacts, it does provide data that can be used to evaluate the potential to cause health risk impacts. The very low level of PM_{2.5} emissions coupled with the short-term duration of construction activity and the relatively small-scale of the project resulted in an overall low level of diesel particulate matter concentrations in the project area. Furthermore, the proposed project would use construction contractors that are required by State regulations to be in compliance with the CARB airborne toxic control measures (ATCM) anti-idling measure, which limits idling to no more than five minutes at any location for diesel-fueled commercial vehicles, further minimized diesel particulate matter emissions in the project area. Sensitive receptors were exposed to emissions below thresholds and construction TAC impacts are less than significant.

Operations

The proposed project introduced a new on-site stationary equipment, specifically a diesel emergency generator. The stationary emission source is subject to air permitting with the SCAQMD and the TACs impact will be minimized in accordance with SCAQMD Rule 1401 (New Source Review of Toxic Air Contaminants). Specifically, the Rule 1401 limits cancer risk to be no greater than in one million (1.0×10^{-6}) at any receptor location if the permit unit is constructed without Best Available Control Technology for Toxics (T-BACT), and 10 in a million if permit unit is constructed with T-BACT; the cumulative increase in hazard index (chronic or acute) shall be no greater than 1. The CEQA significance thresholds are 10 in million for cancer risk and 1 for hazard index. The proposed project would be required to obtain air permits and operate within the SCAQMD's guidelines and permit conditions. Therefore, the proposed project would not expose surrounding sensitive receptors to TAC emissions. Impacts would be considered less than significant.

- d) Potential sources that may emit odors during construction activities include construction equipment exhaust, the application of asphalt, and the use of architectural coatings and solvents. According to the SCAQMD CEQA Air Quality Handbook, construction equipment is not a typical source of odors. SCAQMD Rule 1113 limits the amount of VOCs from architectural coatings and solvents. Further, construction odor emissions would be temporary, short-term, and intermittent in nature and would cease upon completion of construction. Through adherence with mandatory compliance with SCAQMD Rules, no construction activities or materials would create objectionable odors. The nearest sensitive receptor are residences located more than 1,700 feet (213 meters) to the southwest of the project at the corner of 213th Street and Wilmington Avenue. The project's uses would not typically generate nuisance odors at nearby sensitive receptors.

According to the SCAQMD CEQA Air Quality Handbook, land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting operations, refineries, landfills, dairies, and fiberglass molding facilities. The proposed project does not include any of the land uses associated with odor complaints. Therefore, impacts related to odors will be less than significant.

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Biological Resources

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
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 type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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"/>

Discussion

- a) Project implementation would result in a significant impact if the proposed action resulted in the loss or destruction of individuals of a species or through the degradation of sensitive habitat. The project site is located in a highly urbanized area of the City of Carson and is currently developed with a warehouse facility, associated office/administrative facilities, loading docks, and surface parking. No candidate, sensitive, or special status species habitats or related plans, policies, or regulations occur on or in proximity to the project site. Thus, the project would not disturb any native or protected trees as defined by the Carson Municipal Code (CMC) Section 3901 (Appendix B, *California Natural Diversity Database (CNDDB) Results, 2018*). Therefore, no impacts to candidate, sensitive, or special status species would occur and no mitigation measures are required.
- b) A significant impact would occur if any riparian habitat or natural community would be lost or destroyed as a result of urban development. As discussed in the response to Checklist Question 4.a, the project site and surrounding area are located in a highly urbanized and industrial setting, there are no drainage channels to the nearby Los Angeles river, it does not contain riparian habitat, and there are no other sensitive natural

communities as indicated in the City or regional plans or in regulations by the California Department of Fish and Wildlife (CDFW) or U.S. Fish and Wildlife Service (USFWS). Therefore, no impact would occur to riparian habitat or a natural community.

- c) A significant impact would occur if federally protected wetlands would be modified or removed by a project. As discussed above, in the response to Checklist Question 4.a, the project site is located in a highly urbanized area and is developed with a warehouse facility, associated office/administrative facilities, loading docks, and surface parking. The surrounding area has been fully developed with urban uses and associated infrastructure. The project site does not contain any wetlands as defined by Section 404 of the Clean Water Act. Thus, because the project site does not contain any wetland features no impact would occur.
- d) Project implementation would result in a significant impact if the proposed action would interfere with, or remove access to, a migratory wildlife corridor or impede use of native wildlife nursery sites. The Project Site is located in a highly urbanized area and is currently developed with a warehouse facility, associated office/administrative facilities, loading docks, and surface parking. Due to the highly urbanized nature of the Project Site and surrounding area, the lack of a major water body, and the lack of trees or natural open space area on the Project Site, the site does not contain substantial habitat for native resident or migratory species, or native nursery sites. Therefore, the project would not interfere 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, and no impact would occur.
- e) Project implementation would result in a significant impact if the proposed action would be inconsistent with local regulations pertaining to biological resources. As discussed above, the project site is located in a highly urbanized area and is currently developed with a warehouse facility, associated office/administrative facilities, loading docks, and surface parking, and no candidate, sensitive, or special status species habitats occur on or in proximity to the project site. Additionally, there are no trees proposed to be removed and no other landscape modifications are proposed. Thus, the proposed project would not interfere with local biological preservation policies or ordinances and no impact would occur.
- f) Project implementation would result in a significant impact if the proposed action would be inconsistent with any adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or state habitat conservation plan. As discussed above, the project site is located in a highly urbanized area and is currently developed with a warehouse facility, associated office/administrative facilities, loading docks, and surface parking, and no candidate, sensitive, or special status species habitats occur on or in proximity to the project site. The project site is not located within an area designated within a habitat conservation plan, natural community conservation plan, or other approved local, regional, or State habitat conservation plan (CDFW, 2015). Thus,

the project would not conflict with the provisions of any adopted conservation plan and no impact would occur.

References

California Department of Fish and Wildlife, Habitat Conservation Planning, Natural Community Conservation Planning, Summary of Natural Community Conservation Plans (NCCPs) August 2015. Available at: <https://www.wildlife.ca.gov/Conservation/Planning/NCCP/Plans>. Accessed October 2017.

California Department of Fish and Wildlife, California Natural Diversity Database (CNDDB), Results April, 2018. Appendix B.

Cultural Resources

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
V. CULTURAL RESOURCES — Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

- a) A significant impact would occur if the proposed project would substantially alter the environmental context of or remove identified historical resources. A historical resource is defined in Section 15064.5(a)(3) of the State CEQA Guidelines as any object, building, structure, site, area, place, record, or manuscript determined to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California. Historical resources are further defined as those associated with significant events, important persons, or distinctive characteristics of a type, period or method of construction; representing the work of an important creative individual; or possessing high artistic values. Resources listed in or determined eligible for the California Register, included in a local register, or identified as significant in a historic resource survey are also considered historical resources under CEQA. A review of historical aerials shows the project site was developed sometime after 1980 and before 1994. Thus, the project building does not qualify or contain, nor is it adjacent to, any identified historic resources. Therefore, no impact to historical resources would occur.
- b) A significant impact would occur if a known or unknown archaeological resource would be removed, altered, or destroyed as a result of the proposed development. Section 15064.5(a)(3)(D) of the State CEQA Guidelines generally defines archaeological resources as any resource that “has yielded, or may be likely to yield, information important in prehistory or history.” Archaeological resources are features, such as tools, utensils, carvings, fabric, building foundations, etc., that document evidence of past human endeavors and that may be historically or culturally important to a significant earlier community.

Though the project site does not contain any known archaeological resource, it is possible that unknown archaeological resources occur under the project site. While the project could include minor construction activities, ground-disturbing activities would be minimal and would not reach underlying native soils, which have the potential to contain unknown archaeological resources. For this reason, the project would have a relatively

low potential to inadvertently damage any unknown archaeological resources. Therefore, no impact to archaeological resources would occur.

- c) A significant impact would occur if previously interred human remains would be disturbed during excavation of the project site. The project site has been previously graded and developed, but it is possible that as yet undiscovered human remains occur under the project site; however, ground-disturbing activities during construction would be minimal and would have a relatively low potential to uncover any unknown human remains. Therefore, no impact to human remains would occur.
-

Energy

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
VI. ENERGY — Would the project:				
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion

- a), b) The proposed project would consume energy during the construction activities associated with building improvements and upgrades. Energy uses would result primarily from on- and off-road vehicle fuel consumption in the form of diesel and gasoline. Since the project would not include grading activities, electricity usage from water conveyance for dust control is not included in this analysis. Project operation would consume energy from activities including general building operations (HVAC, and lighting) and mobile sources (product transport and delivery, employee trips, etc.) and would increase operational energy use². The analysis below includes the project's energy requirements and energy use efficiencies by energy type for each stage of the project (construction and operations).

Construction

The project would consume energy during construction activities, primarily from on- and off-road vehicle fuel consumption in the form of diesel and gasoline. The analysis below includes the project's energy requirements and energy use efficiencies by energy type for each stage of the project.

The estimated fuel usage for off-road equipment is based on the number and type of equipment that would be used during construction activities, hour usage estimates, the total duration of construction activities, and hourly equipment fuel consumption factors from the CARB OFFROAD model, which was used in the project's air quality analysis. On-road vehicles would include trucks to haul material to and from the project site, vendor trucks to deliver supplies necessary for project construction, and fuel used for employee commute trips. Construction activities typically do not involve the consumption of natural gas. **Table 7** summarizes the project's total and annual fuel and electricity consumption from construction activities.

² This analysis is comparing the existing energy use from construction and operation of the project compared to a vacant site. It should be noted that approval of the CUP would not increase energy use compare to a by-right warehouse use.

TABLE 7
SUMMARY OF ENERGY CONSUMPTION DURING PROJECT CONSTRUCTION

Fuel Type	Quantity
Gasoline	gallons
On-Road Construction Equipment	7,803
Off-Road Construction Equipment	-
Total Gasoline	7,803
Diesel	gallons
On-Road Construction Equipment	7,305
Off-Road Construction Equipment	37,123
Total Diesel	44,428
Project Length	1 Year
Annual Average Gasoline Use (gal)	7,803
Annual Average Diesel Use (gal)	44,428

SOURCE: ESA, 2018

The energy use summary provided above in Table 7 represents the amount of energy that could potentially be consumed during project construction based on a conservative set of assumptions, provided in Appendix C, *Inland Star Energy Consumption Calculations*, of this Draft IS/MND. As shown, on- and off-road vehicles would consume an estimated 7,803 gallons of gasoline and approximately 44,428 gallons of diesel fuel throughout the project's construction. For comparison purposes, the fuel usage during project construction would represent approximately 0.0002 percent of the 2015 annual on-road gasoline-related energy consumption and 0.007 percent of the 2015 annual diesel fuel-related energy consumption in Los Angeles County. Detailed calculations are shown in Appendix C, *Inland Star Energy Consumption Calculations*, of this Draft IS/MND.

The project construction contractors would comply with applicable CARB regulations governing the accelerated retrofitting, repowering, or replacement of heavy duty diesel on- and off-road equipment. CARB adopted an ATCM to limit heavy-duty diesel motor vehicle idling time in order to reduce public exposure to diesel particulate matter and other toxic air contaminants. CARB approved the Truck and Bus regulation to reduce NO_x, PM₁₀, and PM_{2.5} emissions from existing diesel vehicles operating in California. In addition to limiting exhaust from idling trucks, CARB recently promulgated emission standards for off-road diesel construction equipment of greater than 25 horsepower to reduce emissions by requiring the installation of diesel soot filters and encouraging the retirement, replacement, or repower of older, dirtier engines with newer emission-controlled models. While intended to reduce construction criteria pollutant emissions, compliance with the above anti-idling and emissions regulations would also result in efficient use of construction-related energy and the minimization or elimination of wasteful and unnecessary consumption of energy.

Heavy-duty engines continue to become more efficient and reduction amounts may lessen in the future due to this. Although the energy savings cannot be accurately quantified, the project would still reduce consumption of diesel fuel under the anti-idling measure. Thus, construction of the proposed project would use energy necessary to provide building improvements and upgrades, but would not result in the wasteful, inefficient, and unnecessary use of energy and impacts would be less than significant.

Operations

During operation of the project, energy would be consumed for multiple purposes, including, but not limited to, heating/ventilating/air conditioning (HVAC), lighting and the use of electronics, and equipment. Energy would also be consumed during project operations related to water usage, solid waste disposal, and vehicle trips. **Table 8** summarizes the project's operational energy sources in comparison to SCE, SoCalGas, and Los Angeles County transportation fuel consumption.

TABLE 8
PROJECT OPERATIONAL ENERGY USAGE AND REGIONAL ENERGY SUPPLY

Source	Natural Gas Per Year (cubic feet)	Electricity Per Year (million kWh)	Diesel Fuel Per Year (gallons)	Gasoline Fuel Per Year (gallons)
SoCalGas (2018) ^a / SCE (2015) ^b	934,035,000,000	87,544	—	—
Los Angeles County (Transportation Sector) (2016) ^c	—	—	630,769,231	3,465,000,000
Building Consumption	189,491	0.56	—	—
Mobile Sources	—	—	75,852	139,987
Emergency Generator	—	—	1,578	—
Total	189,491	0.58	77,430	139,987
Percent of SoCalGas / SCE	0.00002%	0.0006%	—	—
Percent of Los Angeles County (Transportation Sector)	—	—	0.012%	0.004%

NOTES:

^a California Gas and Electric Utilities, 2018 California Gas Report, 2018, p.101. Available at: https://www.socalgas.com/regulatory/documents/cgr/2018_California_Gas_Report.pdf. Accessed December 2018.

^b Southern California Edison. 2015 Financial and Statistical Report. Available at <https://www.edison.com/content/dam/eix/documents/investors/sec-filings-financials/2017-financial-statistical-report.pdf>. Accessed December 2018.

^c California Energy Commission, California Retail Fuel Outlet Annual Reporting (CEC-A15) Results, 2015, http://www.energy.ca.gov/almanac/transportation_data/gasoline/2017_A15_Results.xlsx. Accessed December 2018. Diesel is adjusted to account for retail (52%) and non-retail (48%) diesel sales.

SOURCE: ESA, 2018.

The project would increase demand for electricity including what is needed to support building operations. As shown in Table 8, the project would result in a projected consumption of electricity totaling approximately 0.56 million kWh per year and represent 0.0006 percent of SCE's total sales in 2015. The project has been evaluated for

consistency with the EECAP. According to the EECAP, the City is in the process of implementing strategies to reduce energy consumption across sections, which includes promoting commercial energy retrofits (Carson 2015). Consistent with this strategy, the project installed lighting and a ventilation system that conforms to the California Green Building Code (Inland Star 2018) and would be consistent with energy reduction strategies in the City's EECAP.

In addition, the City in cooperation with the South Bay Cities Council of Governments developed a Climate Action Plan (CAP) to help reduce GHG emissions within the City (Carson 2017). The CAP was approved in 2017, after Inland Star began operations at the project site, however, the energy retrofits were in effect at the time of building occupancy.

As discussed above, the project would comply with the applicable provisions of Title 24, City of Carson's EECAP, and the CALGreen Code in effect at the time of building occupancy. As such, the project would minimize energy demand. Therefore, with the incorporation of these features, operation of the project would not result in the wasteful, inefficient, and unnecessary consumption of electricity.

The project would increase the demand for natural gas resources. The project's estimated operational natural gas demand is provided in Table 8. As shown in Table 8, the project is projected to generate an annual demand for natural gas totaling approximately 189,491 cubic feet which represents 0.00002 percent of SoCalGas' 2015 throughput. As would be the case with electricity, the project would comply with the applicable provisions of Title 24, City of Carson's EECAP, and the CALGreen Code in effect at the time of building occupancy to minimize natural gas demand. As such, the project would minimize energy demand. Therefore, with the incorporation of these features, operation of the project would not result in the wasteful, inefficient, and unnecessary consumption of natural gas, and impacts would be less than significant.

The project would increase demand for transportation fuels, such as gasoline and diesel. During operations each day, the proposed project has a maximum of 34 employee trips and 55 truck trips. The Project's annual gasoline consumption would be approximately 139,987 gallons which represents 0.004 percent of Los Angeles County's 2015 consumption. The Project's annual diesel consumption would be approximately 77,430 gallons which represents 0.012 percent of Los Angeles County's 2015 consumption. Diesel consumption includes fuel consumption from the emergency fire pump.

As discussed above in Issue 3, *Air Quality*, of this Draft IS/MND, SCAG predicted Carson's employment growth between 2012 and 2040 to be 11,200 jobs (SCAG, 2016). The estimated 17 new FTE employees generated by the proposed project are well within SCAG's employment growth assumptions for Carson. As discussed in Issue 16, Transportation and Traffic, the project does not have a significant impact on transportation or traffic in the project vicinity. Furthermore, the study area has a limited existing bikeway network which includes bicycle lanes that run east/west along Del Amo

Boulevard, west of Wilmington Avenue. Additional facilities and improvements are planned as part of the *LA Metro Active Transportation Strategic Plan*, including bicycle lanes on Wilmington Avenue, Carson Street, 223rd Street, Rancho Way, Santa Fe Avenue, and Del Amo east of Wilmington Avenue. Bicycle routes are proposed along 213th Street west of Wilmington Avenue, along Wilmington Avenue south of 220th Street to 223rd street, and Ackmar Avenue south of Carson Street. Furthermore, the project has a planned and existing network of bike and bus transit that could be used to access the site. Therefore, since the project is consistent with SCAG growth projections and would comply with state and local regulations to reduce energy consumption, the project would not result in the wasteful, inefficient, and unnecessary consumption of energy and impacts would be less than significant.

References

- California Air Resources Board (CARB), Mobile Source Emissions Inventory, <https://www.arb.ca.gov/emfac/>. Accessed October 2018.
- CARB, Proposed Regulation Order: Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling, Appendix A, 2004. Available at <https://www.arb.ca.gov/regact/idling/isorappf.pdf> Accessed October 2018.
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- SCAG, 2016. *2016-2040 RTP/SCS*, Available: http://rtpscs.scag.ca.gov/Documents/2012/final/SR/2012fRTP_GrowthForecast.pdf. Accessed December 2018.

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<https://www.edison.com/content/dam/eix/documents/investors/sec-filings-financials/2015-financial-statistical-report-final.pdf>. Accessed December 2018.

Geology and Soils

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
VII. GEOLOGY AND SOILS — Would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? (Refer to Division of Mines and Geology Special Publication 42.)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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"/>
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

- a.i) The project site is located in the seismically active Southern California Region; however, it is not within an Alquist-Priolo Zone. The City's General Plan Regional Fault Map indicates that the project site is in the Newport Inglewood structural zone and states that surface faulting does not appear to be a significant potential hazard (City of Carson, 2004). As with any new project development in the State of California, the building design and construction would be required to conform to the current seismic design provisions of the City's Building Code, which incorporates relevant provisions of the 2016 California Building Code (CBC). The 2016 CBC, as amended by the City's Building Code, incorporates the latest seismic design standards for structural loads and materials to provide for the latest in earthquake safety. Accordingly, the project improvements previously constructed by Inland Star in 2015 are in compliance with all applicable building regulations including the City's zoning code and the CBC. Furthermore, no new construction is proposed; as such, the Project would not expose

additional people or structures to potential substantial adverse effects. Therefore, no new impacts would occur.

- a.ii) A significant impact would occur if the proposed project would cause personal injury or death or result in property damage as a result of seismic ground shaking. The entire Southern California region including the project site, is susceptible to strong ground shaking from severe earthquakes. The level of ground shaking that would be experienced at the project site from active or potentially active faults or blind thrust faults in the region would be a function of several factors including earthquake magnitude, type of faulting, rupture propagation path, distance from the epicenter, earthquake depth, duration of shaking, site topography, and site geology. As discussed above, the building design would have been reviewed and approved by the City's building inspectors before occupancy permits would have been issued to ensure the industrial park including the project building was constructed in accordance with the CBC, and thereby the City's Building Code, which includes requirements for structures that reduce the potential for exposure of people or structures to seismic risks to the maximum extent possible. In addition, the improvements previously constructed by Inland Star are in compliance with all applicable regulations to reduce the exposure of people or structures to potential substantial adverse effects.

On behalf of the City, a risk assessment was completed and is discussed more thoroughly in 8b (GSI, 2019). The risk assessment was completed in order to understand the nature of a risk associated with an offsite consequence analysis of an accidental release scenario such as an earthquake. The risk assessment evaluated an accidental release in the event of the collapse of the building's roof due to a magnitude 7 earthquake. The evaluation concluded the building design, seismic upgrades, and other improvements (e.g. reinforced storage shelving structures) would offer substantial protection against damage in the event of an earthquake and the roof or other structural elements of the building collapsing was determined to be unlikely.

Although the likelihood of the roof collapsing due to an earthquake and a subsequent chemical release was determined to be low, concentrations of chemicals to five nearby sensitive receptor locations (the City of Carson Corporate Yard, residences west of Wilmington Avenue, Del Amo Elementary School, residences east of Alameda Street, and Dolphin Park) were modeled using a set of conservative assumptions for such a release. The modeled concentrations were based on the assumption of a near-instantaneous release of the largest container of each of the top nine chemicals in the inventory that could pose the highest risk to the five nearby sensitive receptors. The accidental release scenarios and associated risks were modeled using the Area Locations of Hazardous Atmospheres (ALOHA™) model. The results generated from the ALOHA model were then compared to the Protective Action Criteria (PAC) values, which are emergency exposure guidelines used to assist emergency planners respond to chemical releases.

Ambient air concentrations for all modeled chemicals under the roof collapse and full container release scenario did not exceed the 60-minute PAC guideline at any of the five receptor locations. Only one chemical, acetonitrile, had a modeled ambient concentration above the maximum concentration of 13 parts per million (ppm) for any length of time. However, that concentration level was not maintained longer than 60 minutes to exceed the PAC guideline. Based on the results of the modeling, the release under this scenario would not cause an unacceptable increased risk to offsite sensitive receptors. Therefore, no impact associated with strong seismic ground shaking would occur.

- a.iii) Project implementation would result in a significant impact if the proposed action would cause personal injury or death or result in property damage as a result of liquefaction or other ground failure. Liquefaction is a seismic phenomenon in which loose, saturated, granular soils behave similarly to a fluid when subject to high-intensity ground shaking. Specifically, liquefaction occurs when the shock waves from an earthquake of sufficient magnitude and duration compact and decrease the volume of the soil; if drainage cannot occur, this reduction in soil volume will increase the pressure exerted on the water contained in the soil, forcing it upward to the ground surface. This process can transform stable soil material into a fluid-like state. This fluid-like state can result in horizontal and vertical movements of soils and building foundations from lateral spreading of liquefied materials and post-earthquake settlement of liquefied materials. Liquefaction occurs when three general conditions exist: 1) shallow groundwater; 2) low density non-cohesive (granular) soils; and 3) high-intensity ground motion.

According to the City's General Plan (City of Carson 2004), the site is located in an area where historic occurrences of liquefaction or local geological geotechnical or ground water conditions indicate a potential for permanent ground displacements. However, as discussed above, the industrial park where the project site is located was constructed in accordance with the CBC, which includes requirements for structures that reduce the potential for exposure of people or structures to seismic risks to the maximum extent possible, including liquefaction. The improvements previously constructed by Inland Star are also in compliance with all applicable building regulations, and no new construction is proposed. As such, the proposed project would not expose additional people or structures to potential substantial adverse effects associated with liquefaction. Therefore, no impact would occur.

- a.iv) A significant impact would occur if the proposed project would cause personal injury or death or result in property damage as a result of a landslide. Due to the relatively flat topography of the project site and surrounding area, the project site would not expose people or structures to potential landslides. Because there is real topographic relief in the project area, no impact would occur.
- b) Project implementation would result in a significant impact if construction activities or future uses would result in substantial soil erosion or loss of topsoil. The project site is located within an existing building in a fully developed, urbanized area that does not contain exposed soil. Furthermore, while construction could include ground-disturbing

- activities, these activities would be minimal and would comply with all applicable construction regulations, including the National Pollution Elimination Discharge System, which requires best management practices to ensure soil erosion and loss of top soil does not occur. Therefore, soil erosion or loss of topsoil impacts would not occur.
- c) A significant impact would occur if the proposed project would 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 caused in whole or in part by the project's exacerbation of the existing environmental conditions. The project site is located within an existing building in a fully urbanized area with relatively flat topography. The industrial park wherein the project site is located was constructed in accordance with the CBC, and thereby the City's Building Code, which includes requirements for structures that reduce the potential for exposure of people or structures to seismic risks to the maximum extent possible. In addition, the improvements previously constructed by the applicant are in compliance with all applicable regulations to reduce the exposure of people or structures to potential substantial adverse effects. Furthermore, while construction could include ground-disturbing activities, these activities would be minimal and would comply with all applicable construction regulations, including the CBC, to ensure effects from unstable soils are minimized. Therefore, no impact would occur.
- d) A significant impact would occur if the proposed project occurred on a site with expansive soils without the implementation of proper site preparation or design features. Expansive soils are typically associated with fine-grained clayey soils that have the potential to shrink and swell with repeated cycles of wetting and drying. The project site is located within an existing building. Prior to construction, a geotechnical study was performed as part of the building review and permit process, which in part would identify the presence of expansive soil. Because building occupancy permits were issued it is assumed building construction complied with all applicable building codes, which reduce the potential for exposure of people or structures to such risks to the maximum extent possible. Therefore, no impact from expansive soils would occur.
- e) Project implementation would result in a significant impact if adequate wastewater disposal is not available. The project site is located within an existing building and is served by community water and sewer service. Furthermore, no septic tanks or alternative wastewater disposal systems are in use or would be required under the proposed project. Therefore, no impact would occur.
- f) Project implementation would result in a significant impact if excavation or construction activities associated with the proposed project would disturb paleontological or unique geological features. The project site does not contain any known unique paleontological resource; or unique geological feature. It is possible that unknown subsurface resources occur under the project site; however, ground-disturbing activities would be minimal and would not reach underlying native soils, which have the potential to contain unknown paleontological resources. For this reason, the project would have a relatively low

potential to inadvertently damage an unknown paleontological resources., thus activities that could potentially uncover a paleontological resource would not be included as part of this project. Therefore, no impact to paleontological resources would occur.

References

City of Carson. City of Carson General Plan. 2004. Available at: <http://ci.carson.ca.us/content/files/pdfs/planning/CityofCarsonGeneralPlan.pdf>. Accessed March 2018.

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Greenhouse Gas Emissions

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
VIII. GREENHOUSE GAS EMISSIONS —				
Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion

- a) Gases that trap heat in the atmosphere are called GHGs. The major concern with GHGs is that increases in their concentrations are causing global climate change. Global climate change is a change in the average weather on Earth that can be measured by wind patterns, storms, precipitation, and temperature. Although there is disagreement as to the rate of global climate change and the extent of the impacts attributable to human activities, most in the scientific community agree that there is a direct link between increased emissions of GHGs and long term global temperature increases.

The State of California defines GHGs as carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), sulfur hexafluoride (SF₆), perfluorocarbons (PFCs), and hydrofluorocarbons (HFCs). Because different GHGs have different global warming potentials (GWPs) and CO₂ is the most common reference gas for climate change, GHG emissions are often quantified and reported as CO₂ equivalents (CO₂e). For example, CH₄ has a GWP of 25 (over a 100-year period); therefore, one metric ton (MT) of CH₄ is equivalent to 25 MT of CO₂ equivalents (MTCO₂e). The State uses the GWP ratios available from the United Nations Intergovernmental Panel on Climate Change (IPCC) and published in the *Fourth Assessment Report* (AR4). By applying the GWP ratios, project-related CO₂e emissions can be tabulated in metric tons (MT) per year. Large emission sources are reported in million metric tons (MMT) of CO₂e.³

Some of the potential effects of global warming in California may include loss in snow pack, sea level rise, more extreme heat days per year, more high ozone days, more forest fires, and more drought years (CARB 2008). Globally, climate change has the potential to impact numerous environmental resources through potential, though uncertain, impacts related to future air temperatures and precipitation patterns. The projected effects of global warming on weather and climate are likely to vary regionally, but are expected to include the following direct effects (IPCC 2001):

³ A metric ton is 1,000 kilograms; it is equal to approximately 1.1 U.S. tons and approximately 2,204.6 pounds.

- Higher maximum temperatures and more hot days over nearly all land areas;
- Higher minimum temperatures, fewer cold days and frost days over nearly all land areas;
- Reduced diurnal temperature range over most land areas;
- Increase of heat index over land areas; and
- More intense precipitation events.

Also, there are many secondary effects that are projected to result from global warming, including global rise in sea level, impacts to agriculture, changes in disease vectors, and changes in habitat and biodiversity. While the possible outcomes and the feedback mechanisms involved are not fully understood and much research remains to be done, the potential for substantial environmental, social, and economic consequences over the long term may be great.

California generated 441.5 MMTCO₂e in 2014. Combustion of fossil fuel in the transportation sector was the single largest source of California's GHG emissions in 2014, accounting for approximately 37 percent of total GHG emissions in the state. This sector was followed by the industrial sector (24 percent) and the electric power sector (including both in-state and out-of-state sources) (20 percent) (CARB 2016).

Impacts of GHGs are borne globally, as opposed to localized air quality effects of criteria air pollutants and toxic air contaminants. The quantity of GHGs that it takes to ultimately result in climate change is not precisely known; however, it is clear that the quantity is enormous, and no single project would measurably contribute to a noticeable incremental change in the global average temperature, or to global, local, or micro climates. From the standpoint of CEQA, GHG impacts to global climate change are inherently cumulative.

The City of Carson has not adopted a threshold of significance for GHG emissions that would be applicable to this project. In December 2008, the SCAQMD adopted a 10,000 MTCO₂e per year significance threshold for industrial facilities for projects in which the SCAQMD is the lead agency. Although SCAQMD has not formally adopted a significance threshold for GHG emissions generated by a project for which SCAQMD is not the lead agency, or a uniform methodology for analyzing impacts related to GHG emissions on global climate change, in the absence of any industry-wide accepted standards, the SCAQMD's significance threshold of 10,000 MTCO₂e per year for projects is the most relevant air district-adopted GHG significance threshold and is used as a benchmark for the proposed project. It should be noted that the SCAQMD's significance threshold of 10,000 MTCO₂e per year for industrial projects is intended for long-term operational GHG emissions. The SCAQMD has developed guidance for the determination of the significance of GHG construction emissions that recommends that total emissions from construction be amortized over an assumed project lifetime of 30 years and added to operational emissions and then compared to the threshold (SCAQMD 2008).

The justification for the threshold is provided in SCAQMD's *Interim CEQA GHG Significance Threshold for Stationary Sources, Rules and Plans* ("SCAQMD Interim GHG Threshold"). The SCAQMD Interim GHG Threshold identifies a screening threshold to determine whether additional analysis is required. As stated by the SCAQMD:

...the...screening level for stationary sources is based on an emission capture rate of 90 percent for all new or modified projects...the policy objective of [SCAQMD's] recommended interim GHG significance threshold proposal is to achieve an emission capture rate of 90 percent of all new or modified stationary source projects. A GHG significance threshold based on a 90 percent emission capture rate may be more appropriate to address the long-term adverse impacts associated with global climate change because most projects will be required to implement GHG reduction measures. Further, a 90 percent emission capture rate sets the emission threshold low enough to capture a substantial fraction of future stationary source projects that will be constructed to accommodate future statewide population and economic growth, while setting the emission threshold high enough to exclude small projects that will in aggregate contribute a relatively small fraction of the cumulative statewide GHG emissions. This assertion is based on the fact that [SCAQMD] staff estimates that these GHG emissions would account for slightly less than one percent of future 2050 statewide GHG emissions target (85 [MMTCO₂e per year]). In addition, these small projects may be subject to future applicable GHG control regulations that would further reduce their overall future contribution to the statewide GHG inventory. Finally, these small sources are already subject to [Best Available Control Technology (BACT)] for criteria pollutants and are more likely to be single-permit facilities, so they are more likely to have few opportunities readily available to reduce GHG emissions from other parts of their facility.

Thus, based on guidance from the SCAQMD, if an industrial project would emit GHGs less than 10,000 MTCO₂e per year, the project would not be considered a substantial GHG emitter and GHG emission impact would be less than significant, requiring no additional analysis and no mitigation.

CEQA Guidelines 15064.4 (b)(1) states that a lead agency may use a model or methodology to quantify GHGs associated with a project. In September 2016, the SCAQMD in conjunction with CAPCOA released the latest version of the CalEEMod (Version 2016.3.2). The purpose of this model is to estimate construction-source and operational-source emissions from direct and indirect sources. Accordingly, the latest version of CalEEMod has been used for this project to estimate the project's emission impacts.

Construction Emissions

Construction activities associated with the project would result in emissions of CO₂ and, to a lesser extent, CH₄ and N₂O. Construction-period GHG emissions were quantified based on the same construction schedule, activities, and equipment list as described in Issue 3 (b). To amortize the emissions over the life of the project, the SCAQMD

recommends calculating the total GHG emissions attributable to construction activities, dividing it by a 30-year project life, and then adding that number to a project's annual operational-phase GHG emissions. As such, construction emissions were amortized over a 30-year period and included in the project's annual operational-phase GHG emissions.

Operational Emissions

GHG Emissions

Operational activities associated with the project would result in emissions of CO₂ and, to a lesser extent CH₄ and N₂O. Operational sources of GHG emissions would include mobile sources from vehicles traveling to and from the site, and indirect GHG emissions from export of electricity.

A maximum of 55 truck trips and 17 passenger vehicle trips per day is expected (Fehr & Peers, 2018). GHG emissions from mobile sources were calculated based on the GHG emission factors for transportation fuels (diesel for trucks and gasoline for passenger vehicles) in the CARB's GHG emission inventory. Emissions from passenger vehicle trips traveling to and from the site were quantified using the gasoline emission factors.

Emissions of GHGs also resulted from electricity demand to power the on-site equipment and lighting. Electricity-related GHG emissions are based on the maximum electricity demand for project equipment, assuming maximum operating loads and equipment running hours, and CO₂ intensity factors for Southern California Edison.

Emissions Summary

The project's annual GHG emissions are shown in **Table 9**. As shown, the project's net total GHG emissions would be below the SCAQMD's proposed screening level for industrial/stationary source projects of 10,000 MTCO₂e. The project would result in a less than significant impact with respect to GHG emissions. GHG emission calculations are provided in Appendix D, *Inland Star Greenhouse Gas Emissions Calculations*.

TABLE 9
ANNUAL PROJECT GREENHOUSE GAS EMISSIONS

Emissions Sources	CO₂e (Metric Tons per Year) ^a
Area	<1
Electricity	177
Natural Gas	11
Mobile (Employee)	61
Mobile (Heavy-Duty)	1,780
Fire Pump	16
Forklifts	75
Waste	90
Water	2
Construction	18
Total	2,228

^a Totals may not add up exactly due to rounding in the modeling calculations.

SOURCE: ESA 2018

- b) The City of Carson General Plan does not identify specific GHG or climate change policies or goals, the City's Energy Efficiency Climate Action Plan (EECAP), developed by the South Bay Cities Council of Governments, aims to implement energy efficiency and GHG reduction efforts (Carson 2015). The project has been evaluated for consistency with the EECAP. According to the EECAP, the City is in the process of implementing strategies to reduce energy consumption across sections, which includes promoting commercial energy retrofits (Carson 2015). In addition, the City in cooperation with the South Bay Cities Council of Governments developed a Climate Action Plan (CAP) to help reduce GHG emissions within the City (Carson 2017). The CAP was approved in 2017, after Inland Star began operations at the project site, however, energy retrofits were in effect at the time of building occupancy. Consistent with the strategies identified in the EECAP, the project installed lighting and a ventilation system that conforms to the California Green Building Code (Inland Star 2018). Therefore, the proposed project would be consistent with the applicable GHG reduction strategies in the City's EECAP.

With respect to relevant statewide GHG reduction strategies, in January 2007, the California Governor enacted Executive Order S-01-07, which mandates the following: (1) establish a statewide goal to reduce the carbon intensity of California's transportation fuels by at least 10 percent by 2020; and (2) adopt a Low Carbon Fuel Standard (LCFS) for transportation fuels in California. CARB identified the LCFS as one of the nine discrete early actions in the Climate Change Scoping Plan. The LCFS regulations were approved by CARB in 2009 and established a reduction in the carbon intensity of transportation fuels by 10 percent by 2020 with implementation beginning on January 1, 2011. In September 2015, CARB approved the re-adoption of the LCFS, which became

effective on January 1, 2016, to address procedural deficiencies in the way the original regulation was adopted. In the proposed 2017 Climate Change Scoping Plan Update, CARB's preferred recommendation includes increasing the stringency of the LCFS by reducing the carbon intensity of transportation fuels by 18 percent by 2030, up from the current target of 10 percent by 2020 (CARB 2017).

Overall, as the project would be consistent with the City's EECAP and contributes to the implementation of the LCFS, the project would not conflict with an applicable plan, policy, or regulation to reduce GHG emissions. As such, impacts would be considered less than significant.

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- Inland Star, 2018. ESA Data Needs Request. January 10, 2018.
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Hazards and Hazardous Materials

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
IX. HAZARDS AND HAZARDOUS MATERIALS — Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 or excessive noise for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

- a) Exposure of the public or the environment to hazardous materials can occur through transportation accidents; environmentally unsound disposal methods; improper handling of hazardous materials or hazardous wastes (particularly by untrained personnel) during construction or operation. The severity of these potential effects varies by type of activity, concentration and/or type of hazardous materials or wastes, and proximity to sensitive receptors.

Construction

As discussed prior, the proposed project utilizes an existing warehouse and loading dock and did not include any expansion of the facilities. Construction of the proposed project's improvements and upgrades were minimal with the installation of a water pipeline associated with a new pump house. Project construction activities involved minimal use and transport of hazardous materials. Construction involved the use of some heavy equipment, which use small amounts of oil and fuels. Construction activities that involve hazardous materials are governed by several agencies, including the EPA, DOT,

California Division of Occupational Cal/OSHA, and DTSC. Construction contractors implement Best Management Practices (BMPs) for handling hazardous materials during construction activities, including following manufacturers' recommendations and regulatory requirements for use, storage, and disposal of chemical products and hazardous materials used in construction; avoiding overtopping construction equipment fuel tanks; routine maintenance of construction equipment; and properly disposing of discarded containers of fuels and other chemicals. Construction contractors are required to implement safety measures in accordance with the General Industry Safety Orders of the California Code of Regulations. All construction-related materials were transported and disposed of in accordance with applicable codes and regulations. Compliance with applicable federal, state, and local standards is required; therefore, construction-related impacts in regards to the transport, use, or disposal of hazardous materials during construction are less than significant.

Operation

Operations at the proposed project include receiving, storing, and shipping of regulated and non-regulated packaged hazardous materials for third party manufacturers and distributors. Materials are stored on pallet racking or floor stacked configurations under a High-Pile Storage permit per Los Angeles County Fire Code (Title 32). Operations do not include blending, mixing, formulating, transferring materials from one container to another, or opening of containers. All materials are pre-approved based on a thorough review and analysis of each product by the proposed project operator to ensure that the warehouse infrastructure is compliant to store the materials.

The USDOT, in conjunction with the USEPA, is responsible for the enforcement and implementation of federal laws and regulations pertaining to safe storage and transportation of hazardous materials. CFR 49, 171–180, regulates the transportation of hazardous materials, types of material defined as hazardous, and the marking of vehicles transporting hazardous materials.

All materials are received by Inland Star in approved USDOT packaging. The Federal Motor Carrier Safety Administration, a part of the USDOT, issues regulations concerning highway transportation of hazardous materials, hazardous materials endorsement for a commercial driver's license, highway hazardous material safety permits, and financial responsibility requirements for motor carriers of hazardous materials. As of January 1988, local law enforcement agencies have the authority to write a citation for travel violation or a citation for the improper transportation of shipping containers. All commercial vehicles transporting hazardous materials to and from the proposed project site will have the proper USDOT hazardous materials placards and all drivers' license credentials will be inspected at time of pickup to ensure the driver is legally authorized to transport hazardous materials.

Because operations at the Inland Star facility consist of storage and distribution for third parties, the product inventory may change over time in response to market demands. However, there is not substantial change in the general type of product typically stored at

the facility. Inland Star has a rigorous process for evaluation and intake of new clients and product. Inland Star's Inventory Control Policy provides a system for reviewing customer storage requests prior to acceptance in order to ensure compliance with applicable regulations and company policies. Pursuant to its Inventory Control Policy, prior to accepting any chemicals or other industrial materials, Inland Star reviews the safety data sheets (SDSs) to determine safety and infrastructure compatibility. Inland Star determines if the warehouse has the necessary infrastructures in place to safely store the material. Inland Star then determines how to safely handle and store the material within the infrastructure to achieve and maintain compliance with applicable code(s). Only materials that have been pre-approval for receipt based on this review are accepted at the site and all materials remain in approved DOT packaging while stored on site. Maintaining a real time chemical inventory with storage amounts in an electronic format will ensure the proposed project is not storing chemicals that are incompatible with the building's infrastructure. Mitigation Measure HAZ-1 (below) is needed in order to monitor on-site materials so that the potential impact is less than significant.

The Applicant designed and improved the project site to provide storage for substances that are regulated by the California Accidental Release Prevention Program (CalARP). CalARP substances include both flammable and toxic hazardous materials listed on the Federal Regulated Substances for Accidental Release Prevention and on the State of California Regulated Substances lists. Businesses that handle regulated substances in industrial processes above threshold quantity levels are subject to CalARP program requirements. Although the infrastructure required for the storage of CalARP materials is currently in place, after discussions with the City of Carson, the Applicant agreed not to accept or store CalARP regulated chemicals at the project site. Mitigation Measure HAZ-2 (below) ensures this agreement will be enforced.

The California Hazardous Materials Release Response Plans and Inventory Law of 1985 (Business Plan Act), requires preparation of hazardous materials business plans (HMBP) and disclosure of hazardous materials inventories, including an inventory of hazardous materials handled, plans showing where hazardous materials are stored, an emergency response plan, and provisions for employee training in safety and emergency response procedures (California Health and Safety Code, Division 20, Chapter 6.95, Article 1). The LACFD is the local Certified Unified Program Agency (CUPA) with jurisdiction over facilities hazardous materials. The HMBP provides the necessary information for first responders to prevent or mitigate damage to public health and safety from the release of hazardous materials and aids in response efforts (facility and surrounding community) in the event of an emergency. In addition, an Emergency Action Plan (EAP), was completed and submitted to the CUPA. An EAP is typically required for facilities that store or use CalARP regulated substances, however to demonstrate its commitment to safety, the applicant prepared and submitted an EAP. The EAP identifies the procedures for: 1) evacuating and accounting for visitors and employees, 2) dealing with a chemical release and other foreseeable emergencies that could occur on-site, 3) notifying external agencies and emergency response personnel, and 4) administering first aid measures for chemical exposure. As stated above, the proposed site has agreed not to store CalARP

regulated substances at the proposed site, however to demonstrate its commitment to safety, the EAP was submitted to the LACFD. The applicant submitted a HMBP and EAP for the proposed project to the LACFD on June 27, 2016. Inland Star is currently in compliance with all CUPA requirements.

Operations at the proposed project would not generate hazardous waste materials. However, in the event that a container storing a hazardous material is damaged and is unsalvageable, the contents are secured and the damaged container is picked up either by the chemical's owner for repackaging or by a certified third-party hazardous waste hauler and disposed of at a designated hazardous waste disposal facility under Inland Star's active EPA identification number, (CAL000410784) (DTSC, 2018).

Several building upgrades and improvements to the building infrastructure were implemented including multiple safety features. A 2,500 gallon per minute (gpm) firewater booster pump, a second water service line to provide a redundant water service to the project site in the event the main service line and/or the supplemental water pressure pump failed, and a fire suppression/extinguishing sprinkler system were implemented throughout the building. The upgrades meet the California Building Codes (CBC) and the California Fire Codes (CFC) requirements. The LACFD inspected and issued permits on December 30, 2015 for the following: high-piled storage of hazardous materials including flammable and combustible liquids. The infrastructure upgrades and improvements help minimize health and safety risks to people or the environment associated with routine use of hazardous materials.

The USEPA's Toxic Release Inventory (TRI) program tracks the management of certain toxic chemicals that may pose a threat to human health and the environment. Facilities must report annually how much of each chemical is released to the environment and /or managed through recycling, energy recovery and treatment. A release of a chemical is described as being emitted to the air or water, or placed in some type of land disposal. According to the USEPA's Enforcement and Compliance History (ECHO) database, the proposed project's prior location in Rancho Dominguez did not have any releases (USEPA, 2018).

Mitigation Measures **HAZ-1** and **HAZ-2** are set forth to reduce potential impacts of the proposed project to a less than significant level.

HAZ-1 The Applicant shall maintain a real time electronic chemical inventory of all onsite chemicals and storage amounts and shall be made available to the City upon request. Inland Star shall remain in compliance with all inventory reporting requirements of the LACFD Health Hazardous Materials Division, per its regulatory requirements.

HAZ-2 The Applicant shall comply with the agreement with the City that it will not include the receipt or storage of any substances regulated by the CalARP program.

The storage, use, transport and disposal of hazardous materials are regulated by applicable federal, state, and local regulations. Compliance with Mitigation Measures HAZ-1, HAZ-2, and the Carson Municipal Code Ordinance No. 17-1637, Section 15.140(E)(5)⁴ and other federal, state and local requirements would serve to minimize health and safety risks to people or structures associated with routine use, transport, and disposal. Therefore, operational impacts associated with the project related to use, transport, storage, or disposal of hazardous materials would be less than significant with mitigation.

- b) A significant impact would occur if the proposed project created a significant hazard to the public or environment due to a reasonably foreseeable release of hazardous materials. As stated above, hazardous materials are stored on pallet racking or floor stack configurations. In the event of an earthquake one or several containers could potentially spill.

Construction

Although construction of the project was minimal it would have involved minimal uses of hazardous materials typical to construction, including gasoline, motor oils, paints, solvents, and other miscellaneous materials (e.g., engine oil, etc.). It is assumed all potentially hazardous materials were used and stored in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations. The construction phase involved the use of heavy equipment, which used small amounts of oil and fuels and other potential flammable substances. During construction, equipment would require refueling and minor maintenance on location that could lead to fuel and oil spills. The contractor would be required to identify a staging area for storing materials. Additionally, operators of heavy-duty equipment are trained to remain alert and nearby during fueling of equipment, and spills, should they occur, should not reach the off-site environment. Construction contractors would be required to implement safety measures in accordance with the General Industry Safety Orders of the California Code of Regulations. All construction-related materials would be transported and disposed of in accordance with applicable codes and regulations. Compliance with applicable federal, state, and local standards is required; therefore, construction-related impacts in regards to significant risk of explosion or accidental release of hazardous materials would be less than significant.

Operation

In order to better assess the possibility of a reasonably foreseeable release of hazardous materials, the City requested an analysis of the potential risks associated with the proposed project. GSI Environmental (GSI), a third party engineering and science consulting firm with substantial experience conducting risk assessments completed the risk assessment based on discussions with the City (GSI, 2019). The risk assessment

⁴ Carson Municipal Code Ordinance No. 17-1637, Section 15.140(E)(5), states that all hazardous material used, generated or associated with the operation must be disposed of in a manner which is approved by the Director before disposal occurs, and which is compliant with all local, State, and federal guidelines for the disposal of hazardous materials.

process falls into four broad steps including identifying the hazards, understanding the risks, controlling of hazards and risks, and monitoring of controls.

Specifics of each step, including methodologies and results, are summarized below. The full report can be found in Appendix E, *Inland Star Risk Assessment Report*.

Hazard Identification

The analysis begins by identifying chemicals/products in the inventory that could pose the highest risk to nearby sensitive receptors in the event of an accidental release. The chemicals/products were grouped using the Department of Transportation (DOT) hazard classes along with the DOT 2016 Emergency Response Guidebook, to identify explosive, flammable, combustible, oxidizing, toxic, radioactive, and corrosive hazards.

No chemical/products in the inventory were identified as having a hazard category of explosive or radioactive. The flammable and combustible classes were combined into a single category; and within the remaining four hazard classes, preliminary groups of chemical products that reflect a “priority” for further evaluation were created. These priority groups were developed based upon consideration of the following: (1) United Nations Packing Group,^{5,6} (2) the unit weight (pounds) of the chemical containers of each chemical/product, and (3) physical/chemical properties (e.g., physical state, vapor pressure) of each product/chemical. Five chemicals from both the toxic and flammable groups of chemicals were selected. The list of chemicals in the inventory identified as presenting the greatest relative risk is provided below:

Toxic Class Chemicals Chosen for Modeling:

1. 810 Metal Stripper 20 (a mixture of 70% sodium cyanide and 30% sodium hydroxide) (NaCN CAS# 143-33-8, NaOH CAS# 1310-73-2)
2. N, N-dimethylaniline (CAS# 121-69-7)
3. Methylene Chloride (synonym – Dichloromethane) (CAS# 75-09-2)
4. Perchloroethylene (CAS# 127-18-4)
5. Methyl Amyl Ketone (synonym - Amyl Methyl Ketone) (CAS# 110-43-0)

Flammable Class Chemicals Chosen for Modeling:

1. Anhydrous Acetonitrile (synonym- Acetonitrile) (CAS# 75-05-8)
2. Methyl Acetate (CAS# 79-20-9)
3. Tetrahydrofuran (CAS# 109-99-9)
4. Trans-1,2-Dichloroethylene (synonym - 1,2-Dichloroethylene, trans isomers) (CAS# 156-60-5)

⁵ The UN Packing Group assigns hazardous goods into 3 packing groups in accordance with the degree of potential hazard they present. Hazard decreases from Packing Group I (higher hazard) to Packing Group III (low hazard).

⁶ Packing groups specified in 49 CFR Part 173, Subpart D – Definitions Classification, Packing Group Assignments and Exceptions for Hazardous Materials Other than Class 1 and Class 7

5. Methyl Alcohol (synonym Methanol) (CAS# 67-56-1)

During the evaluation, 810 Metal Stripper 20 was determined to be in a solid, pelletized form with no potential to evaporate and migrate offsite if spilled and was therefore not modeled.

Based on the operations and chemicals, the Inland Star team identified a forklift puncture as the worse-case risk scenario. At the request of the City, two additional risk scenarios were to be evaluated; a container falling off a forklift, and an earthquake/roof collapse causing offsite migration to nearby sensitive receptors.

Risk Assessment

A risk assessment is completed in order to understand the nature of a risk(s), the harm that could occur, and the likelihood of the risk. In order to assess the risk of a chemical release the concentrations of these chemicals need to be compared to exposure guidelines.

The emergency exposure levels or Protective Action Criteria (PAC) values are exposure guidelines, not strict regulatory limits. PACs are meant to assist emergency planners respond to chemical releases. The PACs, combined with estimates of exposure, provide the information necessary to identify and evaluate accidents for the purpose of taking appropriate protective actions. In anticipation of an uncontrolled release, these limits may also be used to estimate the consequences of an uncontrolled release and to plan emergency responses.

Acute Exposure Guideline Levels (AEGLs), Emergency Response Planning Guidelines (ERPGs), and Temporary Emergency Exposure Limits (TEELs). AEGLs are defined for exposure periods that range from 10 minutes to 8 hours. ERPGs and TEELs are only defined for one-hour exposures. PACs are exposure guidelines, not legally enforceable limits but rather are meant to assist emergency planners and responders with chemical releases. They were designed to include conservative assumptions that would provide health protection even to particularly vulnerable receptors such as the elderly, children, and other individuals who may be especially susceptible. Each of the PACs have graded severity levels (-1, -2, and -3) based on exposure concentration thresholds maintained over a specified period of time.

Offsite Consequence Analysis

The accidental release scenarios and associated risks were modeled using the Areal Locations of Hazardous Atmospheres (ALOHA™) model. ALOHA is the air hazard modeling program developed jointly by the National Oceanic and Atmospheric Administration (NOAA) and the USEPA. The modeling software contains a database of chemicals, their properties, and many of the health-related PAC that are commonly used to assess potential risks associated with specific chemical exposures. ALOHA produces simulations of how quickly specified chemicals escape from a vessel, puddle, or pipeline and form a gas cloud, and how the release rates change over time based on the location

inputs. It then models how a gas cloud travels downwind—including both neutrally buoyant and heavy gas dispersion. The model identifies where a particular substance is predicted to exceed a user-specified threshold level at various times following the occurrence of an accidental release and model the concentration over time using specified locations. Where uncertainty is unavoidable, the ALOHA model will err in favor of overestimating rather than underestimating threat distances and in some cases significantly overestimate threat zones.

GSI used the California Code of Regulations Title 19, Sections 2750.1-2750.3 that define scenarios for modeling the release of chemicals that are regulated under CalARP. As previously stated, the proposed project will not receive or store CalARP chemicals but used the regulation to conservatively estimate releases under what the regulations refer to as a “worse-case scenario.” All modeling parameters used in the model were provided in the risk analysis and can be found in Appendix E, *Inland Star Risk Assessment Report*.

The five sensitive receptors within a half mile of the proposed project site included the City of Carson Corporate Yard (R1) located approximately 2,033 feet away, residences west of Wilmington Avenue (R2) located approximately 2,082 feet away, Del Amo Elementary School (R3) located approximately 2,388 feet away, residences east of Alameda Street (R4) located approximately 2,518 feet away, and Dolphin Park (R5) located approximately 2,664 feet away.

Forklift Puncture Scenario

A forklift puncture scenario occurring at the loading dock was identified as a reasonably foreseeable event given the nature of the operations at the proposed project site. While it is possible that containers could be dropped or fall during the transfer process, the containers arrive in DOT-compliant transportation containers. The containers undergo a “Drop-test” as required by 49 CFR 178.603. Due to the DOT-compliant containers being used at the proposed project, a release from spills as a result of a fall or collision at the loading dock was determined to be unlikely. A more likely accidental release scenario was determined to be the puncture of a container (e.g., a drum) by a forklift during loading and/or unloading. Accordingly, GSI has modeled the release associated with a forklift puncture at the loading dock for each of the chemicals analyzed using the chemical’s largest container size.

The proposed project’s standard operating procedures include a step-by-step leak response procedure. Therefore, in the event of a forklift puncture the release response procedures would significantly limit the rate and duration of a release. GSI used a conservative approach and did not assume the full benefit of the response procedures and instead assumed a larger release than would realistically be expected. GSI assumed a single fork of a forklift created a 1-inch by 4-inch hole in the side of a drum. A forklift puncture of a container would result in a near instantaneous release of the chemical causing it to spread and evaporate. Modeled estimates were evaluated against 60-minute guidelines as the releases of chemicals from the drum puncture would create a constant source over a 60-minute period. Concentration estimates were modeled first at a distance

based on the distance between the nearest receptor location (R1) and the loading dock at the proposed project site (approximately 2,033 feet).

Under the forklift puncture release scenario, ambient air concentrations for all modeled chemicals did not exceed the 60-minute PAC at any of the five receptor locations. Only one chemical, acetonitrile had a modeled ambient concentration above the AEGL-1 maximum concentration of 13 parts per million (ppm) for any length of time. However, that concentration level was not maintained greater than 60 minutes to exceed the PAC guideline. At R1 acetonitrile concentrations only rose above 13 ppm for 43 minutes. At R2 and R3 the length of time above 13 ppm was 31- and 8-minutes, respectively. At R4, approximately 2,518 feet away, acetonitrile did not reach the PAC threshold concentration level for any length of time. Based on the results of the modeling, the release under this scenario would not cause an unacceptable increased risk to offsite sensitive receptors.

Containers Falling from Forklift Scenario

The City requested an evaluation of a scenario involving a release due to multiple drums falling from a forklift at the loading dock and spilling outside the building. As previous discussed all substances received and stored would arrive and remain in DOT-approved containers, which undergo a “Drop-test” to ensure that a fall from a distance typical of a loading dock conditions would not leak. The loading dock at the proposed project is approximately 3.9 feet from the ground. Therefore, a fall off of a forklift would not typically be expected to result in a release from the container. If a container were damaged and product was released, the DOT packaging is assumed to still be protective, as the release would be gradual and would be mitigated by the proposed project’s standard operating procedures. Therefore, the likelihood of a chemical release following multiple DOT-approved containers falling from a forklift at the loading dock is remote. If a release were to occur, the amount of material released would not be expected to exceed the amount of material released following the forklift puncture scenario therefore this scenario is not expected to cause exposures above the PAC. Based on the results of the modeling, the release under this scenario would not cause an unacceptable increased risk to offsite sensitive receptors.

Earthquake and Roof Collapse Scenario/Full Container Release Scenario

GSI evaluated an accidental release in the event of the collapse of the building’s wooden roof due to a major seismic event, such as a magnitude 7 earthquake.

The building design, seismic upgrades, and other improvements (e.g., reinforced storage shelving structures) offer substantial protection against damage in the event of an earthquake. The wooden roof is a light weight material that moves with the building in the event of seismic activity. Therefore, the roof or other structural elements of the building collapsing in the event of an earthquake was determined to be unlikely. The DOT-approved packaging of individual containers would further mitigate the likelihood or size of any release.

Although the likelihood of a roof collapse due to an earthquake and a subsequent chemical release was determined to be low, concentrations of chemicals at the receptor locations were modeled using a set of conservative assumptions for such a release based on CalARP worst-case scenario parameters. The modeled concentrations were based on the assumption of a near-instantaneous release of the largest container of each of the chemicals evaluated. No attenuation of downwind concentrations due to partial containment or attenuation of air flow by a damaged roof and building was assumed. In combination with the inherently conservative nature of the ALOHA model and the other modeling assumptions described above, the modeling approach taken provides a conservative evaluation of the release scenario recommended by the City.

Ambient air concentrations for all modeled chemicals under the roof collapse and full container release scenario did not exceed the 60-minute PAC at any of the five receptor locations. Only one chemical, acetonitrile had a modeled ambient concentration above the AEGL-1 maximum concentration of 13 ppm for any length of time. However, that concentration level was not maintained longer than 60 minutes to exceed the PAC guideline. At R1, acetonitrile concentrations only rose above 13ppm for 43 minutes. At R2 and R3 the length of time above 13 ppm was 31- and 8-minutes, respectively. At R4 approximately 2,518 feet away—acetonitrile did not reach the PAC threshold concentration level for any length of time. Based on the results of the modeling, the release under this scenario would not cause an unacceptable increased risk to offsite sensitive receptors.

Based on the risk analysis conducted by GSI and reviewed by the City, none of the nine modeled chemicals exceeded the 60-minute threshold at any of the graded severity levels and at any of the five receptor locations. Based on the results of the modeling, it was determined the releases under the presented scenarios would not cause an unacceptable increased risk to offsite sensitive receptors (GSI, 2018).

Compliance with the above-discussed regulations along with applicable federal, state, and local laws would minimize the potential risks associated with the handling of identified hazardous materials and potential accidents during operation. However, it is reasonably foreseeable that clients may request Inland Star to procure, store, and handle chemicals not currently in the inventory studied. As discussed above under checklist question VIII (a), implementation of Mitigation Measures **HAZ-1** and **HAZ-2** is necessary to verify that chemicals handled at the facility in the future do not pose an additional or increased risk to offsite receptors. Therefore, potential impacts to the public or environment through accidental release due to the routine transport of hazardous materials would be less than significant level with mitigation.

- c) Although the nearest school to the proposed project is not located within one-quarter mile of the Project, a large volume of operational trucks is expected to travel south along South Wilmington Avenue through the intersection of East 213th Street and approximately 0.1 miles east of Del Amo Elementary School. Compliance with the above-discussed DOT regulations requiring all commercial vehicles transporting

- hazardous materials to have the proper USDOT placards and all drivers be legally authorized to transport hazardous materials would reduce any potential impacts of the proposed project. Further, control strategies denoted as MOB-08 and discussed in the Air Quality section (a) addressed the strategies to potentially decrease short-term emissions from on-road heavy-duty vehicles by accelerating replacement of older, emissions-prone engines with newer engines meeting more stringent emission standards. The proposed project complied with CARB requirements to minimize short-term emissions from on-road and off-road diesel equipment. Therefore, potential impacts to the existing school would be less than significant.
- d) The project site is not included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. A review of regulatory databases maintained by county, State, and federal agencies found no documentation of hazardous materials violations or discharge on the project site. A review of the DTSC EnviroStor and SWRCB GeoTracker databases did not indicate any open cleanup sites or hazardous waste facilities within the project area (DTSC 2018). However, EnviroStor listed two remediation sites associated with uses on two properties adjacent to the project site: Soule Steel Company, a metal manufacturing facility located at 2160 East Dominguez Street and Valmont Industries, Inc., a metal galvanizing facility located at 2226 East Dominguez Street. Both sites have received cleanup certification. As the proposed project is not located on a remediation site impacts related to hazardous material sites would be less than significant.
- e) A significant impact would occur if the proposed project exposed persons residing or working in the area to risks associated with the proximity of an airport or in an airport plan area. The project site is approximately 3.6 miles south of the Compton Airport and 3.9 miles west of the Long Beach Airport. The project area would not be located within the Airport Influence Area (Los Angeles County Airport Land Use Commission 2003). Therefore, the proposed project would not pose any airport safety hazards for people residing or working in the project area, and no impacts would occur.
- f) A significant impact would occur if the proposed project impaired the implementation of an emergency response or evacuation plan or blockage of an emergency route. The City has prepared a Multi-Hazard Functional Plan (1996) for emergency response within the city. The plan identifies emergency protocol, critical meeting areas, and emergency evacuation routes. The four major freeways (I-405, SR-91, I-110, and I-710) as well as arterial streets with right-of-way widths from 80 to 100 feet at one-half mile intervals would serve as potential evacuation routes during a disaster. Potential evacuation routes that occur near the site include: Wilmington Avenue, Carson Street, Del Amo Boulevard, and Alameda Street. The project site is not located directly along an evacuation route and operations under the proposed project would not interfere with an adopted emergency response plan or emergency evacuation plan. Therefore, no impact would occur regarding impairing an emergency response or evacuation plan.

- g) A significant impact would occur if the proposed project exposed people and structures to wildfire risks. The project site is located in a highly urbanized area, and would continue to be served by the LACFD. According to the California Department of Forestry and Fire Protection (CAL FIRE), the proposed project is not located within a Very High Fire Hazard Severity Zone (CAL FIRE 2011). Therefore, the proposed project would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires, and no impact would occur.

References

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Hydrology and Water Quality

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
X. HYDROLOGY AND WATER QUALITY — Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 or through the addition of impervious surfaces, in a manner which would:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
i) result in substantial erosion or siltation on- or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iii) create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iv) impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) In flood hazard, tsunami, or seiche zones, risk or release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

- a) A significant impact would occur if the proposed project discharges water that does not meet the quality standards of agencies which regulate surface water quality and water discharge into storm water drainage systems. The project site is located in a highly urbanized area and is currently developed with a warehouse facility, associated office/administrative facilities, loading docks, and surface parking. Two stormwater drains are located in the loading area of the project site and the closest stormwater drain pipeline is the Branton Drain located adjacent to the project site along East Dominguez Street (LACDPW, 2018). The project does not propose modifications that would affect water quality and it would not discharge waste such that a violation would occur. Therefore, no impact would occur concerning violations of water quality standards or waste discharge requirements.
- b) Project implementation would result in a significant impact if the proposed action would substantially deplete groundwater or interfere with groundwater recharge. The project site is located in a highly urbanized area and is currently developed with a warehouse facility,

associated office/administrative facilities, loading docks, and surface parking. The project site has been developed since at least 1994 and does not serve as a source of groundwater.

Additionally, the project site is served by California Water Service (CalWater) and the proposed project would not require the direct use of groundwater at the project site. In addition, the existing project site is almost entirely impermeable and does provide for percolation of surface water into the groundwater table. Therefore, no impact would occur with interference of groundwater recharge.

- c.i) A significant impact would occur if the proposed project would substantially alter the drainage pattern of an existing stream or river so that erosion or siltation would result. The project site is located in a highly urbanized area and is currently developed with a warehouse facility, associated office/administrative facilities, loading docks, and surface parking. No streams, rivers or natural drainages occur on or in proximity to the project site. The project site is fully improved and does not contain exposed soil. Surface runoff from the project site is currently directed to the existing stormwater infrastructure (e.g., gutters, storm drains). As no grading or other construction activities are proposed, drainage patterns would be maintained. Therefore, no impact would occur to streams, rivers or natural drainages.
- c.ii) Project implementation would result in a significant impact if the proposed action would substantially alter the drainage pattern of an existing stream or river such that flooding would result. No streams or rivers occur on or in proximity to the project site. The project site is located in a highly urbanized area and is currently developed with a warehouse facility, associated office/administrative facilities, loading docks, and surface parking. Surface runoff is currently directed to the existing stormwater infrastructure (e.g., gutters, storm drains). As no construction activities are proposed, the proposed project would not result increased runoff rates or amounts and drainage patterns onsite would be maintained. Therefore, no impact resulting from flooding would occur.
- c.iii) A significant impact would occur if runoff water would exceed the capacity of existing or planned storm drain systems serving the project site, or if the proposed project would substantially increase polluted runoff. The project site is located in a highly urbanized area and is currently developed with a warehouse facility, associated office/administrative facilities, loading docks, and surface parking. Surface runoff is currently directed to the existing stormwater infrastructure, which adequately serves the project site. As no new development is proposed, the proposed project would not increase runoff or generate substantial additional sources of polluted runoff. Therefore, no impact would occur associated with exceedances of the capacity of existing or planned storm drain systems.
- c.iv) Project implementation would result in a significant impact if the proposed action would be located within a 100-year floodplain and would impede or redirect flood flows. As stated above, checklist Issue 9e), the project site is not within 100-year flood hazard area.

Further, the proposed project would not include the development of any new structures or modification of the existing drainage patterns. Therefore, no impact would occur with locating structures in a 100-year flood hazard area.

- d) Project implementation would result in a significant impact if the proposed action would be located within an area susceptible to inundation by seiche, tsunami, or mudflow. The project site is not located in a seiche, inundation zone, or tsunami hazard zone. In addition, the project site and the surrounding areas are not located downslope from any unprotected grade so as to be exposed to mudflows. Therefore, no impact would occur associated with seiche, tsunami, or mudflow.
- e) A significant impact would occur if the project obstructed implementation of a water quality control plan or sustainable groundwater management plan. As stated above, the project site is located in a highly urbanized area and is currently developed with a warehouse facility, associated office/administrative facilities, loading docks, and surface parking. The project site has been developed since at least 1989 and does not serve as a source of groundwater. In addition, there are no applicable water quality control plan or sustainable groundwater management plans to the project site, where project implementation would obstruct such plans. Therefore, no impact would occur to a water quality control plan or sustainable groundwater management plan.

References

City of Carson. City of Carson General Plan. 2004. Available at:
<http://ci.carson.ca.us/content/files/pdfs/planning/CityofCarsonGeneralPlan.pdf>. Accessed March 2018.

Los Angeles County Department of Public Works. Los Angeles County Storm Drain System.
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Land Use and Planning

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
XI. 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) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion

- a) Project implementation would result in a significant impact if the proposed action would be sufficiently large or configured in such a way so as to create a physical barrier within an established community. The project site is located in a highly urbanized area and is currently developed with a warehouse facility, associated office/administrative facilities, loading docks, and surface parking. Further, while interior upgrades were previously constructed for the proposed use, the proposed project would not include the development of any new or expanded structures and would not introduce a barrier into the community. Therefore, no impact would occur.
- b) A significant impact would occur if the proposed project would conflict with applicable land use plans, policies, or regulations of an agency with jurisdiction over the project adopted for the purpose of avoiding or mitigating an environmental effect. The proposed project is consistent with the existing industrial land use and zoning designations set forth in the Carson Municipal Code and the General Plan. As discussed above, the City of Carson's General Plan designates the project site's land use as Heavy Industrial, which is intended to provide for the full range of industrial uses, but whose operations are more intensive and may have nuisance or hazardous characteristics. Additionally, businesses handling acutely or highly hazardous materials in the Hazardous Materials Disclosure Program pursuant to the Los Angeles County Fire Code would be permitted with proper safeguards. With approval of a Conditional Use Permit (CUP), the storage of hazardous materials would be permitted on the project site. Inland Star's packaged chemical warehouse use as storage facility with heavy trucks travelling to and from the project site and in that way is similar to many other heavy industrial uses in the City and the immediate vicinity of the project site. Thus, with approval of a CUP, impacts would be less than significant.

Mineral Resources

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
XII. MINERAL RESOURCES — Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<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"/>

Discussion

- a) Project implementation would result in a significant impact if the proposed action would result in the loss of availability of known mineral resources. The project site is located in the City of Carson in an urbanized area, on a developed parcel with surrounding industrial uses. According to the Los Angeles County Conservation and Natural Resources Element and the California Department of Conservation (CDC), the project site is in Mineral Resource Zone 2 (MRZ-2), as identified in Figure 9.6, Mineral Resources (Los Angeles County 2015), and the CDC Mineral Lands Classification Map (CDC 1982). The project site is fully developed with a warehouse facility, associated office/administrative facilities, loading docks, and surface parking. Further, while interior upgrades were previously constructed for the proposed use, the proposed project would not include the development of any new structures and would not require any grading or excavation activities (with the exception of the water line extension). No mineral extraction or other mining operations have historically or currently occur within the project site, nor would the project result in the loss of availability of any known mineral resource. Therefore, no impact to a known mineral resource would occur.
- b) A significant impact would occur if the proposed project would result in the loss of availability of locally important mineral resources. As described above, the project site is in MRZ-2 as identified by the Los Angeles County Conservation and Natural Resources Element and the CDC. While the project is within an MRZ-2 zone, no mineral extraction or other mining operations have historically or currently occur within the project site, nor would the project result in the loss of availability of any locally important mineral resource. Further, the project site is not identified as an area that contains known mineral resources in the City's General Plan (City of Carson 2004). Under the proposed project, no grading or excavation activities are proposed. Therefore, no impact would occur to a locally important mineral resources.

References

California Department of Conservation, Division of Mines and Geology. Mineral Lands Classification Map. 1982. Available at: ftp://ftp.consrv.ca.gov/pub/dmg/pubs/sr/SR_143/PartIV/Plate_4-21.pdf. Accessed March 2018.

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Noise

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
XIII. NOISE — Would the project result in:				
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

- a) Noise is defined as unwanted sound; however, not all unwanted sound rises to the level of a potentially significant noise impact. To differentiate unwanted sound from potentially significant noise impacts, the City of Carson has established noise regulations that take into account noise-sensitive land uses. The following analysis evaluates potential noise impacts at nearby noise-sensitive land uses that may result from construction and operation of the project. As discussed below, the proposed project is expected to have a less than significant impact on preexisting noise conditions and will not violate any codes or ordinances.

Noise Principles and Descriptors

Sound can be described as the mechanical energy of a vibrating object transmitted by pressure waves through a liquid or gaseous medium (e.g., air). Noise is generally defined as unwanted sound (i.e., loud, unexpected, or annoying sound). Acoustics is defined as the physics of sound. In acoustics, the fundamental scientific model consists of a sound (or noise) source, a receiver, and the propagation path between the two. The loudness of the noise source and obstructions or atmospheric factors affecting the propagation path to the receiver determines the sound level and characteristics of the noise perceived by the receiver. Acoustics addresses primarily the propagation and control of sound (Caltrans 2013, Section 2.2.1).

Sound, traveling in the form of waves from a source, exerts a sound pressure level (referred to as sound level) that is measured in decibels (dB), which is the standard unit of sound amplitude measurement. The dB scale is a logarithmic scale (i.e., not linear) that describes the physical intensity of the pressure vibrations that make up any sound, with 0 dB corresponding roughly to the threshold of human hearing and 120 to 140 dB corresponding to the threshold of pain. In a non-controlled environment, a change in sound level of 3 dB is considered “just perceptible,” a change in sound level of 5 dB is considered “clearly noticeable,” and a change in 10 dB is perceived as a doubling of

sound volume (Caltrans 2013, Section 2.1.3). Pressure waves traveling through air exert a force registered by the human ear as sound (Caltrans 2013, Section 2.1.3).

The typical human ear is not equally sensitive to all frequencies of the audible sound spectrum. As a consequence, when assessing potential noise impacts, sound is measured using an electronic filter that deemphasizes the frequencies below 1,000 hertz (Hz) and above 5,000 Hz in a manner corresponding to the human ear's decreased sensitivity to extremely low and extremely high frequencies. This method of frequency weighting is referred to as A-weighting and is expressed in units of A-weighted decibels (dBA). A-weighting follows an international standard methodology of frequency de-emphasis and is typically applied to community noise measurements (Caltrans 2013, Section 2.1.3).

An individual's noise exposure is a measure of noise over a period of time, whereas a noise level is a measure of noise at a given instant in time. Community noise varies continuously over a period of time with respect to the contributing sound sources of the community noise environment. Community noise is primarily the product of many distant noise sources, which constitute a relatively stable background noise exposure, with the individual contributors unidentifiable. The background noise level changes throughout a typical day, but does so gradually, corresponding with the addition and subtraction of distant noise sources such as traffic. What makes community noise variable throughout a day, besides the slowly changing background noise, is the addition of short-duration, single-event noise sources (e.g., aircraft flyovers, motor vehicles, sirens), which are readily identifiable to the individual. These successive additions of sound to the community noise environment change the community noise level from instant to instant, requiring the measurement of noise exposure over a period of time to legitimately characterize a community noise environment and evaluate cumulative noise impacts (Caltrans 2013, Section 2.2.2.1).

The time-varying characteristic of environmental noise over specified periods of time is described using statistical noise descriptors in terms of a single numerical value, expressed as dBA. The most frequently used noise descriptors are summarized below (Caltrans 2013, Section 2.2.2.2):

- L_{eq} :** The L_{eq} , or equivalent sound level, is used to describe the noise level over a specified period of time, typically 1-hour, i.e., $L_{eq(1)}$, expressed as L_{eq} . The L_{eq} may also be referred to as the "average" sound level.
- L_{max} :** The maximum, instantaneous noise level.
- L_{min} :** The minimum, instantaneous noise level.
- L_x :** The noise level exceeded for specified percentage (x) over a specified time period; i.e., L_{50} and L_{90} represent the noise levels that are exceeded 50 and 90 percent of the time specified, respectively.
- L_{dn} :** The L_{dn} is the average noise level over a 24-hour day, including an addition of 10 dBA to the measured hourly noise levels between the hours of 10:00 p.m. to 7:00

a.m. to account nighttime noise sensitivity. L_{dn} is also termed the day-night average noise level or DNL.

CNEL: Community Noise Equivalent Level (CNEL), is the average noise level over a 24-hour day that includes an addition of 5 dBA to the measured hourly noise levels between the evening hours of 7:00 p.m. to 10:00 p.m. and an addition of 10 dBA to the measured hourly noise levels between the nighttime hours of 10:00 p.m. to 7:00 a.m. to account for noise sensitivity during the evening and nighttime hours, respectively. CNEL and L_{dn} noise levels typically differ by less than 1 dBA and are generally interchangeable.

City of Carson Municipal Code

The City of Carson Municipal Code (“CMC”) Article 5, Chapter 5 details the City’s approach to noise control and standards. Section 5500 of the CMC states the City’s intent to adopt the Los Angeles County Municipal Code (“LACMC”) Noise Control Ordinance (Title 12, Chapter 12.08) as the CMC’s own noise control ordinance with some key amendments. Section 12.08.390(B) of the LACMC sets standards for acceptable exterior noise levels. The standards are intended to protect the community from excessive noise levels that have the potential to: (i) interfere with sleep, communication, relaxation, and enjoyment of property; (ii) contribute to hearing impairment; and (iii) adversely affect the value of property. The standards for exterior noise levels are summarized in **Table 10**.

Noise measurement calculations are provided in Appendix F, *Inland Star Noise Measurements*.

TABLE 10
CITY OF CARSON EXTERIOR NOISE LEVEL STANDARDS

Zone	Time Interval	Hourly Equivalent Sound Level (dBA, L_{eq})
I. Noise Sensitive Area	Anytime	45 dBA
II. Residential Properties (nighttime)	10:00 p.m. to 7:00 a.m.	45 dBA
Residential Properties (daytime)	7:00 a.m. to 10:00 p.m.	50 dBA
III. Commercial Properties (nighttime)	10:00 p.m. to 7:00 a.m.	55 dBA
Commercial Properties (daytime)	7:00 a.m. to 10:00 p.m.	60 dBA
IV. Industrial Properties	Anytime	70 dBA

SOURCE: LACMC, Section 12.08.390.

Article 5, Chapter 5, Section 5502 of the CMC provides a list of amendments added to the LACMC for application in the City of Carson. Section 5502(c) addresses noise standards for construction activities with nearby residential land uses. Long term construction (defined as more than 21 days of scheduled work) is permitted Monday through Saturday from 7:00 a.m. to 8:00 p.m. given construction does not exceed 65 dBA in single-family residential areas and 70 dBA in multi-family residential areas. Construction noise levels take precedence over the noise standards listed in Table NOI-1.

Section 5502(h) lists amendments to the LAMC for procedures for obtaining a variance from the requirements of Article 5, Chapter 5 of the CMC, which may be granted by the Planning Commission for a period not to exceed two years, subject to such terms, conditions and requirements as may be reasonable under the circumstances.

City of Carson General Plan Noise Element

In addition to the previously described CMC provisions, the City has also established noise guidelines in the Noise Element of the City's General Plan that are used for planning purposes (City of Carson, 2002). These guidelines are based in part on the community noise compatibility guidelines established by the California State Governor's Office of Planning and Research and are intended for use in assessing the compatibility of various land use types with a range of noise levels (OPR 2003). **Table 11** provides the guidelines of land use compatibility for community noise sources. The CNEL noise levels for specific land uses are classified into four categories: (1) "normally acceptable" (2) "conditionally acceptable" (3) "normally unacceptable" and (4) "clearly unacceptable." A CNEL value of 65 dBA is considered the dividing line between a "conditionally acceptable" and "normally unacceptable" noise environment for noise sensitive land uses, including residences, and schools. A CNEL value of 70 dBA is considered the dividing line between a "normally acceptable" and "normally unacceptable" noise environment for noise sensitive land uses, including neighborhood parks.

TABLE 11
GUIDELINES FOR NOISE COMPATIBLE LAND USE

Land Use Categories	Community Noise Exposure (CNEL, dB)			
	Normally Acceptable	Conditionally Acceptable	Normally Unacceptable	Clearly Unacceptable
Residential – Low Density	50-60	60-65	65-75	75-85
Residential Multi- Family	50-60	60-65	65-75	75-85
Transient Lodging, Hotel, Motel	50-65	65-70	70-80	80-85
School, Library, Church, Hospital, Nursing Home	50-60	60-65	65-80	80-85
Auditorium, Concert Hall, Amphitheater	N/A	50-65	N/A	65-85
Sports Arena, Outdoor Spectator Sports	N/A	50-70	N/A	70-85
Playground, Neighborhood Park	50-70	N/A	70-75	75-85
Golf Course, Riding Stable, Water Recreation, Cemetery	50-70	N/A	70-80	80-85
Office Building, Business, Commercial, Professional	50-67.5	67.5-75	75-85	N/A
Agriculture, Industrial, Manufacturing, Utilities	50-70	70-75	75-85	N/A

Based on the Governor's Office of Planning and Research, "General Plan Guidelines", 1990. To help guide determination of appropriate land use and mitigation measures vis-a-vis existing or anticipated ambient noise levels.

A = Normally Acceptable: Specified land use is satisfactory, based upon the assumption buildings involved are conventional construction, without any special noise insulation.

C = Conditionally Acceptable: New construction or development only after a detailed analysis of noise mitigation is made and needed noise insulation features are included in project design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning will suffice.

N = Normally Unacceptable: New construction or development generally should be discouraged. A detailed analysis of the noise reduction requirements must be made and noise insulation features included in the design of a project.

U = Clearly Unacceptable: New construction or development should generally not be undertaken.

SOURCE: City of Carson General Plan Noise Element 2002.

Thresholds of Significance

The City's noise ordinance regulates construction and operational noise. With respect to the community noise assessment, changes in noise levels of less than 3 dBA are generally not discernable to most people, while changes greater than 5 dBA are readily noticeable and would be considered a significant increase. Therefore, the significance threshold for mobile source noise is based on human perceptibility to changes in noise levels (increases) with consideration of existing ambient noise conditions and City's land use noise compatibility guidelines. Therefore, the project would result in a significant noise impact if:

- Project construction activities would generate noise levels in single-family residential areas that exceed 65 dBA between the hours of 7:00 a.m. and 8:00 p.m., Monday through Saturday, and exceed 55 dBA between the hours of 8:00 p.m. and 7:00 a.m. (the next day) Monday through Saturday and at any time on Sunday or City-observed holidays;
- Project on-site stationary sources (i.e., air conditioning units, pumps) increase existing ambient noise levels at adjacent sensitive receptors by 5 dBA or more if the existing noise levels do not already exceed the City's exterior noise standards, or by 3 dBA or more if the existing noise levels already exceed the City's exterior noise standards or if the resulting noise levels would exceed the City's exterior noise standards; or
- Project-related off-site traffic increases ambient noise levels by 5 dBA CNEL or more along roadway segments with sensitive receptors, and the resulting noise level occurs on a noise-sensitive land use within an area categorized as "normally acceptable;" or causes ambient noise levels to increase by 3 dBA CNEL or more and the resulting noise occurs on a noise-sensitive land use within an area categorized as "conditionally acceptable," "normally unacceptable," or "clearly unacceptable."

Noise Sensitive Receptors

The project area is located on East Dominguez Avenue north of Interstate 405, and is currently zoned as manufacturing, heavy (City of Carson 2015). The following land uses are located in proximity to the project area:

- **West** – Land uses immediately west of the project area consists of non-noise sensitive industrial uses. Further west of the project area approximately 2,640 feet (0.5 miles) away, there are noise-sensitive receptors of single-family residential homes, Dolphin Park and Del Amo Elementary School.

- **North** – Land uses north of the project area consists of non-noise sensitive industrial uses and open space.
- **East** – Land uses to the east of the project area consists of non-noise-sensitive industrial facilities. Further east of the project area, there are noise-sensitive single-family residential homes 1,580 feet (0.3 miles) from the project area, separated from the project site by the Southern Pacific railroad right-of-way.
- **South** – Land uses to the south of the project area consists of non-noise-sensitive industrial uses.

Construction Noise

The project consisted of (1) demolition of portions of the existing surface lots and installation of a water pipeline, (2) warehouse facility improvements: installation of a fire suppression system including fire suppression/extinguishing sprinkler systems throughout the building and installation of an ESFR system in portions, and construction of twelve three-hour rated fire walls containing fire doors (three fire walls for each storage area) to divide the warehouse facility into four segregated storage areas

On-Site Construction Activities

Noise from construction activities would be generated by the operation of vehicles and equipment involved during various stages of construction: demolition, warehouse facility upgrades, etc. The noise levels generated by construction equipment would vary depending on factors such as the type and number of equipment, the specific model (horsepower rating), the construction activities being performed, and the maintenance condition of the equipment. To more accurately characterize construction-period noise levels, the average (Hourly L_{eq}) noise level associated with each construction phase is estimated based on the quantity, type, and usage factors for each type of equipment used during each construction phase and are typically attributable to multiple pieces of equipment operating simultaneously. Over the course of a construction day, the highest noise levels would be generated when multiple pieces of construction equipment are operated concurrently.

However, because project construction will require minimal pieces of equipment and that the nearest sensitive receptors are approximately 1,580 feet east and 2,640 feet west of the project, project construction noise levels will be below the 65 dBA threshold set by CMC Section 5502(c) for construction noise in single-family residential areas between the hours of 7:00 a.m. and 8:00 p.m., Monday through Saturday. In addition, the single-family residential homes 1,580 feet east of the project site are separated from the project site by existing industrial buildings and the Southern Pacific railroad right-of-way. In addition, the single-family residential homes, Dolphin Park and Del Amo Elementary School that are approximately 2,640 feet west of the project site, are separated from the project site by existing industrial and commercial buildings, which would further diminish the noise levels experienced by the sensitive receptors. Therefore, on-site construction noise levels would not exceed the significance thresholds at off-site sensitive receptor locations. As such, construction noise impacts would be less than significant, and no mitigation measures would be required.

Off-Site Construction Activities

During all phases of construction, haul and vendor truck trips would be required to bring construction materials and ship building debris to and from the project site. Based on the City of Carson's General Plan, the project area and truck routes are located close to Interstate 405 and 710 and within noise contours from 60 dBA to 70 dBA. The temporary addition of the number of haul truck trips required per day during construction activities would not contribute to an audible in noise levels above the existing noise levels. Additionally, the off-site haul truck activities are temporary in nature and would only take place for twelve months after which the project would cease to have any significant lasting noise impact on the surrounding areas. Therefore, off-site construction traffic noise impacts would be less than significant and no mitigation measures would be required.

Operational Noise

The existing noise environment in the project vicinity is dominated by traffic noise from nearby roadways, as well as nearby industrial activities. Long-term operation of the project would have a minimal effect on the noise environment in proximity to the project area. Noise generated by the project would result primarily from the added off-site traffic.

Off-Site Traffic Noise

Vehicle trips attributed to operation of the project would increase average daily traffic ("ADT") volumes along the major thoroughfares within the project vicinity, which was analyzed to determine if any traffic-related noise impacts would result from project development. The street segments chosen for this analysis have residential land uses which are the most affected by traffic increases generated by the project, as indicated in the project traffic impact analysis (Fehr and Peers 2018). The FHWA TNM Version 2.5, based on the methodology described in the Technical Manual, was used to predict the noise level due to vehicular traffic. Noise data can be found in Appendix F, *Inland Star Noise Measurements*.

Future roadway noise levels were calculated along arterial segments affected by project-related traffic. Roadway noise attributable to the project was calculated using the traffic noise model previously described and was compared to baseline noise levels that would occur under the "No Project" condition. Project impacts are shown in **Table 12**. As indicated, operation of the project would not result in a substantial increase in project-related traffic noise levels over existing traffic noise levels. The increase in noise level would be substantially less than threshold of a 5 dBA increase in an area characterized by normally acceptable and conditionally acceptable noise levels or 3 dBA increase in an area characterized by conditionally unacceptable or normally unacceptable noise levels. In order to increase traffic noise levels by 3 dBA, the traffic volumes with the project would need to double from the "Existing" to the "With Project" conditions. The project would not cause traffic volumes to double as a result of implementation and operation. As a result, project-related operational traffic noise impacts would be less than significant.

TABLE 12
ESTIMATED OPERATIONAL TRAFFIC NOISE LEVELS

Roadway Segment	Calculated Traffic Noise Levels at 50 feet from Roadway (dBA Leq)			
	Existing (A)	Existing with Project (B)	Project Increment (B - A)	Exceed Threshold?
Sepulveda Blvd				
Between E Del Amo Blvd and E Dominguez St	69.0	69.1	0.1	No
Between E Dominguez Street and E Carson St	69.3	69.4	0.1	No
Between E Carson Street and I-405 NB On/Off Ramps	67.6	67.7	0.1	No
Between E I-405 NB On/Off Ramps and I-405 SB On/Off Ramps	69.3	69.4	0.1	No
SOURCE: ESA 2018				

On-Site Operational Noise

The operation of mechanical equipment typical for improvements like those included in the project could generate noise levels which may be audible in the immediate vicinity. The main component of the facility that produces noise would be the on-site emergency generator associated with the fire pump.

The Project would include one on-site emergency generator housed in the Pump House, which would be located at the north end of the project site. The emergency generator would be used to provide a second water line to provide a redundant water service to the project site in the event the main service line and/or the supplemental water pressure pump failed. Maintenance and testing of the emergency generator would not occur daily, but rather periodically, up to 50 hours per year per South Coast Air Quality Management District Rule 1470 (refer to Section IV.C, *Air Quality*, of this Draft EIR). The nearest noise sensitive uses would be the single-family residential area to the east of the Project Site, which would be located approximately 1580 feet from the location of the emergency generator.

Based on a noise survey that was conducted for a larger generator by ESA, the generator would generate noise levels of approximately 96 dBA L_{eq} at 25 feet.⁷ The nearest sensitive receptors are approximately 1,580 feet east of the project. Based on a noise level source strength of 96 dBA L_{eq} at a reference distance of 25 feet, and accounting for distance attenuation (36 dBA loss) and barrier insertion loss by the existing industrial buildings (25 dBA loss), generator-related activity noise would be approximately 35 dBA

⁷ The generator reference noise levels were obtained at a Time Warner facility using the Larson-Davis 820 Precision Integrated Sound Level Meter (sound meter) in May 2016 for a 500 horsepower engine. The Larson-Davis 820 sound meter is a Type 1 standard instrument as defined in the American National Standard Institute S1.4. All instruments were calibrated and operated according to the applicable manufacturer specification. The microphone was placed at a height of approximately five feet above the local grade.

L_{eq} at these noise sensitive uses and therefore would not exceed the City's residential noise standards of 50 dBA during the daytime and 45 dBA during the nighttime. As a result, emergency generator noise would not result in a substantial increase in noise levels at noise-sensitive receptor locations and on-site operational noise impacts would be less than significant.

- b) The project improvements would be constructed using typical construction techniques. As such, it is anticipated that the equipment to be used during construction would not expose persons to or generate excessive ground-borne vibration. Post-construction on-site activities would be limited to industrial uses that would not generate excessive ground-borne vibration.

Vibration Principles and Descriptors

Ground-borne vibration from development is primarily generated from the operation of construction equipment and from vehicle traffic. Ground-borne vibration propagates from the source through the ground to adjacent buildings by surface waves. Vibration energy dissipates as it travels through the ground, causing the vibration amplitude to decrease with distance away from the source. Vibration in buildings is typically perceived as rattling of windows, shaking of loose items, or the motion of building surfaces. The vibration of building surfaces also can be radiated as sound and heard as a low-frequency rumbling noise, known as ground-borne noise. Vibration levels for potential structural damage is described in terms of the peak particle velocity ("PPV") measured in inches per second ("in/sec").

Ground-borne vibration is generally limited to areas within a few hundred feet of certain types of industrial operations and construction/demolition activities such as pile driving. Road vehicles rarely create enough ground-borne vibration amplitude to be perceptible to humans unless the receiver is in immediate proximity to the source or the road surface is poorly maintained and has potholes or bumps. If traffic, typically heavy trucks, does induce perceptible building vibration, it is most likely an effect of low-frequency airborne noise or ground characteristics.

Building structural components also can be excited by high levels of low-frequency airborne noise (typically less than 100 Hz). The many structural components of a building, excited by low-frequency noise, can be coupled together to create complex vibrating systems. The low-frequency vibration of the structural components can cause smaller items such as ornaments, pictures, and shelves to rattle, which can cause annoyance to building occupants.

Human sensitivity to vibration varies by frequency and by receiver. Generally, people are more sensitive to low-frequency vibration. Human annoyance also is related to the number and duration of events; the more events or the greater the duration, the more annoying it becomes. Ground-borne vibration related to human annoyance is generally related to root mean square ("rms") velocity levels, and expressed as velocity in decibels ("VdB").

Regulatory Framework

The City of Carson does not address vibration either in the CMC or in the Noise Element of the General Plan. With respect to ground-borne vibration from construction activities, the California Department of Transportation (“Caltrans”) has adopted guidelines/recommendations to limit ground-borne vibration based on the age and/or condition of the structures that are located in close proximity to construction activity. With respect to residential and commercial structures, Caltrans’ technical publication, titled Transportation- and Construction-Induced Vibration Guidance Manual, provides a vibration damage potential threshold criteria of 0.5 inches per second PPV for historic and older buildings, 1.0 inch-per-second PPV for newer residential structures, and 2.0 inches per second PPV for modern industrial/commercial buildings. In addition, the guidance also sets 0.035 PPV as the threshold for “distinctly perceptible” human response to steady state vibration (Caltrans 2004).

According to the Federal Transit Administration (“FTA”), ground vibrations from construction activities very rarely reach the level that can damage structures. A possible exception is the case of old, fragile buildings of historical significance where special care must be taken to avoid damage. The construction activities that typically generate the most severe vibrations are blasting and impact pile driving, which would not be utilized for the proposed project. The proposed project would utilize construction equipment such as use of skid steer loaders and excavators, which would generate ground-borne vibration during excavation and foundation activities. Based on the vibration data by the FTA, typical vibration velocities from the operation of a large bulldozer would be approximately 0.089 inches per second PPV at 25 feet from the source of activity, 0.031 inches per second PPV at 50 feet distance, and 0.011 inches per second PPV at 100 feet distance.

Construction Vibration

The nearest off-site single-family residential buildings are located to the east of the project area, which are approximately 1,580 feet from the project area. At a distance of 1,580 feet, the maximum vibration level would be well below the Caltrans construction vibration structure damage criteria as the project would not generate vibration levels at nearby buildings that would exceed the 0.5 inches per second PPV structural damage threshold or the 0.035 inches per second PPV “distinctly perceptible” human response threshold. Therefore, construction vibration impacts would be less than significant and mitigation measures are not required.

Operational Vibration

Once construction activities have been completed, there would be no substantial sources of vibration activities from the project area. The project’s operations would include industrial-grade stationary mechanical and electrical equipment, such as pumps, compressor units, and exhaust fans, which would produce limited levels of vibration.

Ground-borne vibration generated by each of the above-mentioned equipment and activities would generate approximately up to 0.0014 inches per second PPV at locations adjacent (within 50 feet) to the project (ASHRAE, 1999).⁸ The potential vibration levels from all project operational sources at the closest existing building and human annoyance receptor locations would be less than the significance criteria for building damage and human annoyance of 0.5 inches per second PPV and 0.035 inches per second PPV, respectively as the closest sensitive receptors are approximately 1,580 feet away from the Project Site. As such, vibration impacts associated with operation of the project would be less than significant, and no mitigation measures are required.

- c) The project area is not located within an airport land use plan area or within two miles of a public airport or public use airport. Therefore, construction or operation of the project would not expose people to excessive airport related noise levels. No impact would occur.

References

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⁸ America Society of Heating, Refrigerating and Air-Conditioning Engineers, Inc. (ASHRAE), Heating, Ventilating, and Air-Conditioning Applications, 1999.

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Population and Housing

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
XIV. POPULATION AND HOUSING — Would the project:				
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

- a) Project implementation would result in a significant impact if the proposed action would induce substantial population growth that would not have otherwise occurred as rapidly or in as great a magnitude. A project could induce population growth in an area directly or indirectly. For example, direct population growth can occur by introducing new businesses or residential areas and indirect growth by extending roads or other infrastructure. The project site is located in a highly urbanized area and is fully developed with a warehouse facility, associated office/administrative facilities, loading docks, and surface parking. Further, while interior upgrades were previously constructed for the proposed use, the proposed project would not include the development of any new structures. In addition, the project is anticipated to require approximately 20 construction workers during construction, where these construction workers would come from the local workforce. Once construction is complete, the project would require approximately 17 new employees. Since the project would not result in any additional development activities and since the existing site uses would remain unchanged, the proposed project would not induce any additional growth in the project vicinity. Therefore, no impact would occur.
- b) A significant impact would occur if the proposed project would displace a substantial quantity of existing residences. The project site is located in a highly urbanized area, is fully developed and does not contain any housing. Further, while interior upgrades were previously constructed for the proposed use, the proposed project would not include the development of any new structures, would not require any grading or excavation activities and would not displace any housing. Therefore, no displacement of substantial quantity of existing residences would occur.

Public Services

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
XV. PUBLIC SERVICES — Would the project:				
a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered government 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 following public services:				
i) Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii) Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii) Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iv) Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
v) Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

- a.i) A significant impact would occur if the LACFD could not adequately serve the proposed project, necessitating a new or physically altered station, the construction of which caused significant adverse environmental impacts. The project site is currently served by LACFD, which also serves as the CUPA. The LACFD responds from six fire stations located within the City of Carson and the closest station to the project site is Station #10 located 0.5 miles northwest of the project site at 1860 Del Amo Boulevard.

The Inland Star Warehousing Facility is permitted for high-piled non-regulated, combustible, flammable and hazardous storage by the LACFD. As discussed above in Section 2.0, Project Description, Existing Safety Features, Inland Star installed fire safety features to ensure fire suppression capabilities at the project site above established standards. All hazardous materials storage infrastructures and operational practices also meet all applicable sections of CBC and CFC. The project site's fire suppression system exceeds the CFC requirements for water volume and fire protection schemes. Inland Star has also submitted a Hazardous Materials Business Plan (HMBP) to the LACFD to provide the information necessary for use by first responders in order to prevent or mitigate damage to public health and safety and/or to the environment from release of a hazardous material. Inland Star has also developed an Emergency Action Plan (EAP) for the purpose of protecting employees and the surrounding community. In the event of a chemical release, employees will evacuate or shelter-in-place, depending on the nature of the release, the LACFD Health Hazardous Material Division, which is the designated first responder for spills or accidental releases, will be contacted for assistance, as necessary and the City's Public Safety Manager will be informed as appropriate. Further, the proposed project would not increase population or additional fire hazards above existing conditions. The existing LACFD facilities are sufficient to serve the proposed project,

and no new or physically altered government facilities would be required. Therefore, impacts would be less than significant.

- a.ii) A significant impact would occur if the Los Angeles County Sheriff's Department (LACSD) could not adequately serve the proposed project, necessitating a new or physically altered station. The project site is served by LACSD Carson Station located 1.90 miles southwest of the project site at 21356 Avalon Boulevard. The site currently operates as a warehousing/ hazardous materials storage facility. The proposed project would not include housing or other growth inducing features, which would potentially require the need for additional sheriff's deputies. Additionally, Inland Star maintains 24-hour surveillance with monitored security cameras. As the proposed project would not increase population and includes security features, the project would not require LACSD to expand or construct new stations to serve the project site. Therefore, impacts would be less than significant.
- a.iii) A significant impact would occur if the existing schools could not adequately serve the proposed project, necessitating new or physically altered facilities. The proposed project would not generate students as it does not include housing or other growth inducing features. Therefore, no impact would occur.
- a.iv) A significant impact would occur if the existing parks could not adequately serve the proposed project, necessitating new or physically altered facilities. The City of Carson contains approximately 599 acres of open space and parkland. This includes Neighborhood and Community Parks, Golf Courses, a Blimp Port, as well as drainage courses and utility transmission corridors (City of Carson, 2004). Further, 243 acres of recreational open space is provided by both California State University Dominguez Hills and public schools located in the City (City of Carson, 2004). The City's standard for permanent public open space is four acres per 1,000 residents. The closest park to the project site is Dolphin Park, located approximately 0.5 miles west of the project site at 21205 Water Street. The project would not cause adverse impacts on existing parks because the project would not involve new housing or employment opportunities that would cause the need for new parks. Therefore, no impact would occur.
- a.v) Project implementation would result in a significant impact if the existing public facilities could not adequately serve the proposed project. The proposed project would not include any new development such as housing or other growth inducing features that could affect public facilities (e.g., libraries). Therefore, no impact would occur.

References

City of Carson. City of Carson General Plan. 2004. Available at: <http://ci.carson.ca.us/content/files/pdfs/planning/CityofCarsonGeneralPlan.pdf>. Accessed March 2018.

Recreation

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
XVI. RECREATION:				
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

- a) Project implementation would result in a significant impact if the proposed action increased the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated. As no new or expanded development is proposed, and the project does not include residential uses, the project would not result in increased use of recreational facilities. See also response to checklist question IXV (iv). Therefore, no impact to neighborhood and regional parks or other recreational facilities would occur.
- b) Project implementation would result in a significant impact if the proposed action included a recreational component. The proposed project would not include the construction or expansion of recreational facilities. Therefore, no impact would occur.

Transportation

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
XVII. TRANSPORTATION — Would the project:				
a) Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Background

This section is based on the Transportation Impact Analysis (TIA) for the Inland Star Distribution Center project prepared by Fehr & Peers, April 2018, which is included in Appendix G, *Inland Star Transportation Impact Analysis*. The TIA addresses the site's traffic generation due to the uses at the site. Parking is not an environmental impact requiring evaluation under CEQA, and therefore is not discussed in the Environmental Evaluation below.

Discussion

- a) The project site is located east of Wilmington Avenue. Interstate 405 (I-405), I-710, and State Route 91 (SR 91) provide regional access to the project site. Major arterials serving the study area include Wilmington Avenue in the north/south direction, and Del Amo Boulevard, Dominguez Street, and Carson Street in the east/west direction. Access to the proposed project site is provided by one shared driveway to the Industrial Park off Dominguez Street. The study area selected for analysis includes five intersections located along S. Wilmington Avenue. As shown below in **Table 13, Study Intersections**, the study area intersections are under the jurisdictions of the City of Carson, Los Angeles County, and the California Department of Transportation (Caltrans).

**TABLE 13
STUDY INTERSECTIONS**

Intersection	Traffic Control	Jurisdiction
1. Wilmington Avenue / Del Amo Boulevard	Signal	City of Carson and Los Angeles County
2. Wilmington Avenue / Dominguez Street	Signal	City of Carson
3. Wilmington Avenue / Carson Street	Signal	City of Carson
4. Wilmington Avenue / I-405 Northbound Ramps	Signal	Caltrans
5. Wilmington Avenue / I-405 Southbound Ramps	Signal	Caltrans

SOURCE: Fehr & Peers, 2018.

Existing Conditions

Existing AM and PM peak period turning movement counts were collected at the study intersections in February and March 2018 during typical weekday conditions. It should be noted that since the proposed project has been operational since 2015, the turning movement volumes include project traffic as well as traffic generated by the surrounding land uses. Therefore, the traffic counts reflect the Existing plus Project traffic volumes used in this analysis.

The Level of Service (LOS) methodology is the same for the City of Carson and Los Angeles County. Both the study area jurisdictions utilize the Intersection Capacity Utilization (ICU) methodology to determine LOS. The ICU methodology compares the volume of traffic using the intersection to the capacity of the intersection (V/C ratio). LOS ranges from LOS A, meaning free-flow conditions, to LOS F, which indicates extreme congestion and system failure. Four of the five study intersections currently operate at LOS D or better during both the AM and PM peak hours. The following intersection currently operate at LOS F during the PM peak hour:

- Wilmington Avenue / I-405 Southbound Ramps

Project Trip Generation, Distribution, and Assignment

Because the site is currently operational, driveway trips could have been an option to inform the trip generation for the proposed project. However, the operation of the site varies considerably from day to day without advanced notice; therefore, the driveway trips were not considered to be a viable approach for estimating trip generation for the site. Absent driveway count data, trip generation estimates were based on a review of truck activity at the site between July 1st and September 30th, 2017, which are the reported busiest months for the facility. On a typical day with the site fully utilized, approximately 55 vehicles were observed to enter/exit the site. With 55 inbound trips and 55 outbound trips on average on a single day, the project generates a total of 110 daily heavy vehicle trips. A passenger car equivalent (PCE) factor of 2.5 was also used to convert the truck trips to PCE trips. The use of this factor results in a total of 275 daily vehicle trips.

During the AM peak hour (7:00 AM to 9:00 AM), the project is capable of processing three trucks entering the site every 30 minutes or six trucks every hour with trucks arriving and departing within the same hour. Therefore, in a given peak hour, the facility may process up to 6 trucks equating to 6 inbound trips and 6 outbound trips, for a total of 12 AM peak hour heavy vehicle trips. The use of the PCE factor of 2.5 results in 30 trips (15 inbound and 15 outbound trips) in the AM peak hour.

During the PM peak hour (4:00 PM to 6:00 PM), the project processes a maximum of fifteen freight carrier trucks which arrive and depart within the same hour. Therefore, in the PM peak hour, the facility typically processes 15 trucks equating to 15 inbound trips and 15 outbound trips, for a total of 30 PM peak hour heavy vehicle trips. The use of the

PCE factor of 2.5 results in 75 trips (38 inbound and 38 outbound trips) in the PM peak hour.

In addition to truck trips, employee trips were also used to calculate the trip generation for the project site. The facility has approximately 17 employees on site in any given day, inclusive of customer service representatives, warehouse personnel, and executives. All employees arrive and depart in the AM and PM peak hours. Therefore, the employees generate approximately 34 total daily vehicle trips, including 17 AM peak hour trips (17 inbound/0 outbound) and 17 PM peak hour trips (0 inbound/17 outbound). The total trip generation for the project, including trucks and employees, is approximately 309 total daily vehicle trips, 47 AM peak hour trips (32 inbound/15 outbound) and 92 PM peak hour trips (38 inbound/55 outbound).

The truck activity origin information at the project site was provided for the AM and PM deliveries to help inform the trip distribution for the site. During the AM peak periods, 49 percent of the trucks were reported to travel from the Port of Los Angeles or the Port of Long Beach to the site, 23 percent of the trucks travel from elsewhere within the State of California, and 28 percent of the trucks travel from outside of the State of California to the site. During the PM peak period, 27 percent of the trucks travel from the Port of Los Angeles or the Port of Long Beach, 38 percent of the trucks travel from elsewhere within the State of California, and 35 percent of the trucks travel from outside of the State of California. Considering those factors and a review of trucks activity to and from the Project site, a trip distribution pattern was developed for the proposed project with the corresponding percentage of traffic likely to be regionally oriented and using the freeway as opposed to the local street system for both AM and PM peak hours. The traffic generated by the proposed project based on the review of truck activity at the project site was then assigned to the street network and study intersections using the established distribution patterns.

Criteria for Determination of Significant Traffic Impact

Criteria for the determination of significant traffic impacts varies according to jurisdiction. The specific criteria for each of the three agencies with jurisdiction over the study intersections are provided below.

- **City of Carson** – An intersection would be significantly impacted with an increase in V/C ratio equal to or greater than 0.02 for intersections operating at LOS E or F after the addition of project traffic. Intersections operating at LOS A, B, C, or D after the addition of project traffic are not considered significantly impacted regardless of the increase in V/C ratio.
- **Los Angeles County** – An intersection would be significantly impacted with an increase in V/C ratio equal to or greater than 0.04 for intersections operating at LOS C, 0.02 for intersections operating at LOS D, or 0.01 for intersections operating at LOS E or F with the addition of project traffic.
- **Caltrans** – Based on the Caltrans established performance standards, a potentially significant traffic impact is defined to occur if the addition of project generated trips

is forecast to cause the performance of a State Highway study intersection to change from acceptable operation (LOS D or better) to deficient operation (LOS E or F).

Existing with Project

The project traffic estimated and assigned to the study intersections was added to the existing traffic volumes to estimate Existing with Project traffic volumes. The Existing with Project traffic volumes were analyzed to determine the projected V/C ratios or intersection delay (depending on jurisdiction), and LOS for each of the analyzed intersections under this scenario. The results of the analysis are shown in **Table 14, Existing plus Project Intersection Levels of Service and Impact Analysis**. As shown in the table, similar to Existing conditions, four of the five study intersections would operate at LOS D or better during both the AM and PM peak hours with the addition of project-generated traffic. the following study intersection would operate at LOS F during the PM peak hour:

- Wilmington Avenue / I-405 Southbound Ramps

After applying the aforementioned significant impact criteria for each of the study intersections, it was determined that the proposed project would not result in significant operational impact under Existing with Project conditions at the five study intersections. Therefore, the proposed project would result in a less-than-significant operational impact at the five study intersections.

TABLE 14
EXISTING PLUS PROJECT INTERSECTION LEVELS OF SERVICE AND IMPACT ANALYSIS

ID	N/S STREET NAME	E/W STREET NAME	INTERSECTION CONTROL	ANALYZED PERIOD	EXISTING BASE		EXISTING BASE + PROJECT		PROJECT INCREASE V/C	SIGNIFICANT IMPACT?
					V/C	LOS	V/C	LOS		
1	Wilmington Ave	Del Amo Blvd	Signalized	AM	0.717	C	0.718	C	0.001	No
				PM	0.820	D	0.830	D	0.010	No
2	Wilmington Ave	Dominguez St	Signalized	AM	0.524	A	0.533	A	0.009	No
				PM	0.539	A	0.550	A	0.011	No
3	Wilmington Ave	Carson St	Signalized	AM	0.646	B	0.653	B	0.007	No
				PM	0.694	B	0.702	C	0.008	No
4	Wilmington Ave	I-405 Northbound On/Off Ramps	Signalized	AM	0.561	A	0.563	A	0.002	No
				PM	0.664	B	0.669	B	0.005	No
5	Wilmington Ave	I-405 Southbound On/Off Ramps	Signalized	AM	0.831	D	0.833	D	0.002	No
				PM	1.046	F	1.051	F	0.005	No

Notes

[1] Methodologies and impact thresholds vary by Jurisdiction.

- b) In accordance with Senate Bill (SB) 743, the new CEQA Guidelines section 15064.3, subdivision (b) was adopted in December 2018 by the California Natural Resources Agency. These revisions to the CEQA Guidelines criteria for determining the significance of transportation impacts are primarily focused on projects within transit priority areas, and shifts the focus from driver delay to reduction of greenhouse gas

emissions, creation of multimodal networks, and promotion of a mix of land uses. Vehicle miles traveled, or VMT, is a measure of the total number of miles driven to or from a development and is sometimes expressed as an average per trip or per person.

The newly adopted guidance provides that a lead agency may elect to be governed by the provisions of this section immediately. Beginning on July 1, 2020, the provisions of this section shall apply statewide. The City is currently engaged in this process and has not yet formally adopted its updated transportation significance thresholds or its updated transportation impact analysis procedures. Since the regulations of SB 743 have not been finalized or adopted by the City, delay and LOS are the measures used in this IS/MND to determine the significance of transportation impacts (see impact discussion a, above). As such, no further analysis is required and no impacts related to CEQA Guidelines section 15064.3, subdivision (b) would occur.

- c) An impact would occur if the project substantially increases hazards due to a design feature. A review of existing site conditions and nearby roadways determined that there are no existing hazardous design features, such as sharp curves or dangerous intersections, on-site or within the vicinity of the project site. The site is already developed and does not include the creation of any such design hazards or include any uses which are incompatible with normal traffic operations. Impacts related to traffic hazards or incompatible uses would be expected to be similar and as such, would be less than significant.
- d) A significant impact would occur if the design of the proposed project would not satisfy local emergency access requirements.

The proposed project would not conflict with the City's adopted emergency response plan/emergency plan and would include roadways and access features that meet the requirements of the LACFD. Since the proposed project is currently operable and is designed and required to adhere to the requirements of the applicable Fire Code, impacts related to emergency access would be less than significant.

References

- Fehr & Peers, 2018. Inland Star Draft Transportation Impact Analysis. April 16, 2018. Appendix G.
- Los Angeles County Metropolitan Transportation Authority (Metro), 2010. 2010 Congestion Management Plan.
http://media.metro.net/projects_studies/cmp/images/CMP_Final_2010.pdf. Accessed December 2018.
- Los Angeles County Metropolitan Transportation Authority (Metro), 2010. Active Transportation Strategic Plan.
https://www.dropbox.com/s/cfrbigx8pzsrp99/ATSP%20Volume%20I_Main%20Report.pdf?dl=0. Accessed December 2018.

Tribal Cultural Resources

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
XVIII. TRIBAL CULTURAL RESOURCES — Would the project:				
a) Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
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 type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

a.i, a.ii) The analysis of tribal cultural resources is based on project notification and a request to consult letter that the City submitted to one (1) Native American individual/organization (the Gabrieleno Band of Mission Indians-Kizh Nation) on April 30, 2018. On May 30, 2018, the City was notified that no consultation would be necessary because no new ground disturbance would occur. The City's AB 52 Project notification and request to consult letter is provided in Appendix H, *Inland Star Tribal Consultation*, of this IS/MND. As a result of the AB 52 consultation for the project, no known tribal cultural resources have been identified at the project site or vicinity and therefore no impact to tribal cultural resources would occur.

References

City of Carson, Notification of Initial Study for the Inland Star Project, Pursuant to Assembly Bill AB 52. April 30, 2018. Appendix H.

Utilities and Service Systems

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
XIX. UTILITIES AND SERVICE SYSTEMS — Would the project:				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Have sufficient water supplies available to serve the project and responsibly foreseeable future development during normal, dry and multiple dry years?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

- a) A significant impact would occur if the proposed project would 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. According to the applicant's CalWater billing statements, the project's monthly water usage is approximately 32,000 gallons per month. This falls below CalWater's estimated demand for a similar building of this size is 77,792 gallons per day. The proposed project would not include any modifications, construction, or development activities which would generate additional water or wastewater demands above existing conditions. Therefore, no impact would occur. The proposed project would not include any modifications, construction, or development activities, and therefore, would not create any additional need for telecommunication services, or electric power, above existing conditions. Given these considerations and project characteristics, impacts would be less than significant.
- b) A significant impact would occur if there were insufficient water supply from existing entitlements. The proposed project would not increase water demand such that new or expanded entitlements are needed. CalWater currently serves the project site and no improvements are proposed which would generate additional water demand. Therefore, this impacts to water supply would be less than significant.
- c) Project implementation would result in a significant impact if the proposed action would exceed the wastewater provider's capacity due to existing commitments. The Joint Water

- Pollution Control Plant (JWPCP) serves the project site. The capacity of this facility is limited to levels associated with approved growth identified by the Southern California Association of Governments (SCAG). As the proposed project would not include new development activities or increase population, it would not generate additional wastewater demands. Therefore, no impact would occur.
- d) A significant impact would occur if the proposed project's solid waste generation exceeded the capacity of permitted landfills. A substantial amount of solid waste is disposed of throughout the region, requiring ongoing landfill expansions. As under existing conditions, solid waste would be collected by Waste Management and taken to the appropriate Sanitation Districts of Los Angeles County landfill with remaining capacity. Landfills operated by Sanitation Districts of Los Angeles County are subject to federal and State programs that regulate operations and capacity in consideration of solid waste reduction goals. The proposed project would not include any construction or operations that would generate additional solid waste over existing conditions. Therefore, this impact would be less than significant.
- e) Project implementation would result in a significant impact if the proposed action was non-compliant with solid waste requirements. The project site is subject to State and City mandates with respect to solid waste, such as implementation of the City's Diversion and Recycling Program. Since the project does not include opening, repackaging, or otherwise altering the containers used to transport chemicals, and does not transfer, mix or otherwise utilize the chemicals contained therein, no hazardous waste is disposed of at the project site or as part of operations. Solid waste generated is typical of industrial/office uses. No changes for the project in disposal type, quantity, or practices are proposed as compared to existing conditions. The proposed project would comply with all applicable solid waste requirements. Therefore, no impact would occur.
-

Wildfire

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
XX. WILDFIRE — If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

- a) A significant impact would occur if the proposed project impaired the implementation of an emergency response or evacuation plan or blockage of an emergency route. The City has prepared a Multi-Hazard Functional Plan (1996) for emergency response within the city. The plan identifies emergency protocol, critical meeting areas, and emergency evacuation routes. The four major freeways (I-405, SR-91, I-110, and I-710) as well as arterial streets with right-of-way widths from 80 to 100 feet at one-half mile intervals would serve as potential evacuation routes during a disaster. Potential evacuation routes that occur near the site include: Wilmington Avenue, Carson Street, Del Amo Boulevard, and Alameda Street. The project site is not located directly along an evacuation route and operations under the proposed project would not interfere with an adopted emergency response plan or emergency evacuation plan. Therefore, no impact would occur regarding impairing an emergency response or evacuation plan.
- b) A significant impact would occur if the proposed project would expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. The project site is located in a highly urbanized area, and would continue to be served by the LACFD. According to CAL FIRE, the proposed project is not located within a Very High Fire Hazard Severity Zone (CAL FIRE 2011). Therefore, the proposed project would not expose people to significant pollutant concentrations resulting from wildland fires, or the uncontrolled spread of a wildfire. Therefore, no impact would occur.
- c) A significant impact would occur if the proposed project would require the installation or maintenance of associated infrastructure that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment. As described above, the proposed

project would not require the installation or maintenance of associated infrastructure. The project site is currently developed with a warehouse facility, associated office/administrative facilities, loading docks, and surface parking. As no further infrastructure would be installed as part of this project, and given that the project site is not located in a Very High Fire Hazard Severity Zone (CAL FIRE, 2011), project implementation would not exacerbate fire risks or result in ongoing environmental impacts. Therefore, no impact would occur.

- d) A significant impact would occur if the proposed project would expose people or structures to risks of flooding or landslides, as a result of post-fire slope instability, or drainage changes. As described above, the project site is located in a highly urbanized area, and would continue to be served by the LACFD. Additionally, according to CAL FIRE, the proposed project is not located within a Very High Fire Hazard Severity Zone (CAL FIRE, 2011). Given the local topographic and environmental characteristics of the project site, the proposed project would not increase the possibility of wildland fire in the project vicinity.

Additionally, the project site is currently developed with a warehouse facility, associated office/administrative facilities, loading docks, and surface parking. No streams, rivers or natural drainages occur on or in proximity to the project site. The project site is fully improved and does not contain exposed soil. Surface runoff from the project site is currently directed to the existing stormwater infrastructure (e.g., gutters, storm drains). As no grading or other construction activities are proposed, drainage patterns would be maintained. Furthermore, due to the relatively flat topography of the project site and surrounding area, the project site would not expose people or structures to potential landslides. Therefore, no impact would occur.

References

California Department of Forestry and Fire Protection (CAL FIRE). 2011. Very High Fire Hazard Severity Zones in Local Responsibility Areas. Available at: http://frap.fire.ca.gov/webdata/maps/los_angeles/LosAngelesCounty.pdf. Accessed October 25, 2017.

Mandatory Findings of Significance

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
XXI. MANDATORY FINDINGS OF SIGNIFICANCE —				
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion

- a) The proposed project would not include any new development or modification of the project site (with the exception of the addition of an additional water line to service the site); thus, it does not have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish and 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 rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory. Further, as discussed previously in the above checklist, the project site does not contain, nor is it adjacent to, such resources. Therefore, no impact would occur.
- b) A significant impact may occur if the proposed project, in conjunction with the related projects, would result in impacts that are significant when taken together. The proposed project would have less than significant or no impact with respect to most environmental topics, as discussed in the above checklist. The transporting and storage of materials to and from and within the project site is regulated to protect public safety and human health; however, with the implementation of Mitigation Measures **HAZ-1** and **HAZ-2** agreed to by Inland Star, potentially significant impacts to human beings, either directly or indirectly, would be reduced to less than significant levels. Therefore, with mitigation incorporated, the project would not result in significant cumulative impacts.
- c) A significant impact may occur if the proposed project has the potential to result in significant impacts, as discussed in the preceding sections. All potential impacts of the proposed project have been identified, and mitigation measures have been prescribed, where applicable, to reduce all potential impacts to less than significant levels. The

proposed project would comply with all applicable permits, regulations, and other conditions imposed by the City of Carson and responsible agencies. Therefore, impacts associated with the project would be less than significant.