Draft

1055 E. SANDHILL AVENUE PROJECT

Initial Study/Mitigated Negative Declaration

Prepared for
City of Carson

June 2021

ESA

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Initial Study/Mitigated Negative Declaration

Prepared for
City of Carson
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June 2021

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CHAPTER 1
Introduction

1. Project Title:	1055 E. Sandhill Avenue Industrial Warehouse
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:	Kaneca Pompey, Assistant Planner (310) 952-1761 x 1327
4. Project Location:	1055 E. Sandhill Avenue Carson, CA 90746
5. Project Sponsor's Name and Address:	Rexford Industrial Reality, Inc. 11620 Wilshire Boulevard, 10th Floor Los Angeles, CA 90025
6. General Plan Designation(s):	Light Industrial
7. Zoning:	Manufacturing Light (ML)

8. Description of Project:

The 1055 E. Sandhill Avenue Industrial Warehouse (proposed project) is located on a 5.79-acre lot with existing industrial uses in the City of Carson (Carson). Located at 1055 East Sandhill Avenue (project site), the proposed project includes the demolition of 8 existing warehouse buildings totaling 109,449 square feet (sf), and the construction of a 122,757 sf industrial warehouse with a 3,256 sf mezzanine for a total building area of 126,013 sf. The proposed project, which would reach a maximum of 43 feet in height, would include 20 truck loading docks on the east side and a surface parking lot with 130 vehicle parking spaces to the west, north, and east. A total of 32,593 sf of landscaping would also be provided along Sandhill Avenue and throughout the project site. In addition, an eight-foot-high fence would be placed around the perimeter of the facility and surface parking lot.

9. Surrounding Land Uses and Setting (Briefly describe the project's surroundings)**:**

The project site is located at 1055 East Sandhill Avenue in the City of Carson. The project site is bound by a Southern California Edison (SCE) utility easement and residential uses to the north, industrial and commercial uses to the east and west, and East Sandhill Avenue to the south.

Immediately north of the site is the SCE utility easement, which contains an existing parking lot and overhead utility lines. The project site is located in a larger industrial park and generally has industrial, manufacturing, and commercials uses surrounding it to the west, east, and south. The industrial park is generally bounded by residential uses to the north and west, State Route 91 (SR-91 or Gardena Freeway) and residential uses to the south, and commercial and industrial uses to the east.

According to the City's General Plan, the project site is designated as Light Industrial land use and is zoned as Manufacturing Light (ML). Similar to the project site, the surrounding land uses to the east, west, and south are also designated with Light Industrial land uses and are zoned ML.

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

The City will use this Initial Study (IS) and supporting documentation to determine the appropriate CEQA document that will accurately disclose any potential environmental impacts of the proposed project. 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:

Approval or certification of the appropriate CEQA document

Approval of Design Overlay Review (DOR) no. 1831-2020

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 December 2020. See Section XVIII, *Tribal Cultural Resources*, for additional information.

Environmental Factors Potentially Affected

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

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

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CHAPTER 2
Project Description

2.1 Project Overview

The purpose of this Initial Study is to identify the potential impacts associated with the Sandhill Avenue Industrial Warehouse (proposed project). The proposed project is located on a 5.79-acre lot at 1055 East Sandhill Avenue (project site) in the City of Carson (Carson). The 252,027 sf project site currently contains eight warehouses that served as a refrigerated food production plant for General Mills Inc., from approximately 1978 to 2020, but these uses are no longer in operation as of March, 2020. As a part of the proposed project, the 8 existing warehouse buildings, totaling 109,449 sf, would be demolished and a 126,013 sf industrial warehouse would be developed on the site. The proposed project would include a 119,501 sf industrial warehouse, 6,512 sf of office space, and a 3,256 sf mezzanine. In total, the project would reach a maximum of 43 feet in height. In addition, the proposed project would include 20 truck loading docks on the east side of the building and a surface parking lot with 130 vehicle parking spaces on the west, north, and east sides. A total of 32,593 sf of landscaping would also be provided along Sandhill Avenue and throughout the project site. In addition, an 8-foot-high fence would be placed around the site.

This 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 construction and operation of the proposed project. 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 and Existing Setting

The 252,027 sf project site is located at 1055 East Sandhill Avenue in the City of Carson, California within Assessor's Parcel Number (APN) 7319-001-034 (**Figure 2-1**, *Project Site and Regional Location*). The project site is bound by a Southern California Edison (SCE) easement to the north, existing industrial uses to the east and west, and East Sandhill Avenue to the south. Immediately adjacent to the project site on east, west, and south are properties that support similar industrial and/or manufacturing uses. Residential uses are adjacent to the SCE utility easement to the north. The project site is designated as Light Industrial land use and zoned as Manufacturing Light (ML). Similar to the project site, the surrounding land uses are also designated with Light Industrial land uses and are zoned as ML.

The project site is located within a larger industrial warehouse complex that was originally constructed in 1973. The project site and existing warehouses served as a refrigerated food production plant for General Mills Inc., from approximately 1978 to March 2020. The project site contains an existing decommissioned oil well, which is located near the western boundary of the project site. **Figure 2-2**, *Existing Conditions*, shows the existing warehouse facilities, which include 109,449 sf of industrial space. **Table 1**, *Existing Facilities*, summarizes the square footage of the existing warehouse buildings on the project site that would be removed as a part of the proposed project.

TABLE 1
EXISTING FACILITIES

Building No.	Building Size (sf)	Building Height (feet)
Building 1	3,628.91	18
Building 2	2,842.34	23
Building 3	1,768.58	21
Building 4	37.01	9
Building 5	100,496	65
Building 6	35.73	9
Building 7	540.29	21
Building 8	99.94	30

2.3 Project Characteristics

As part of the project, the existing eight buildings on the project site, as listed in Table 1 above, would be removed. In addition, an existing transformer, concrete doors and landings, trees, and paving would be removed. As a part of the project, a 126,013 sf warehouse building, with approximately 119,501 sf of warehouse, 6,512 sf of office space, and a 3,256 sf mezzanine at a total height of 43 feet, would be developed on the project site. As shown in **Figure 2-3**, *Site Plan*, the proposed project would include approximately 20 dock high-truck doors and two at grade truck/forklift doors, which would allow transportation of goods to and from the project site. As shown in **Figure 2-4**, *Conceptual Rendering*, the proposed project would consist of neutral-toned building materials, which include concrete, aluminum, and glass.

The proposed project is required to provide 101 parking stalls and proposes to include a total of 130 parking stalls, which would wrap along the east, north, and west perimeter of the site. Of the total parking stalls, 30 compact stalls would be included in the northern parking lot, and 5 American's with Disabilities Act (ADA) accessible stalls, which would be located along the eastern border of the site, adjacent to the office space.

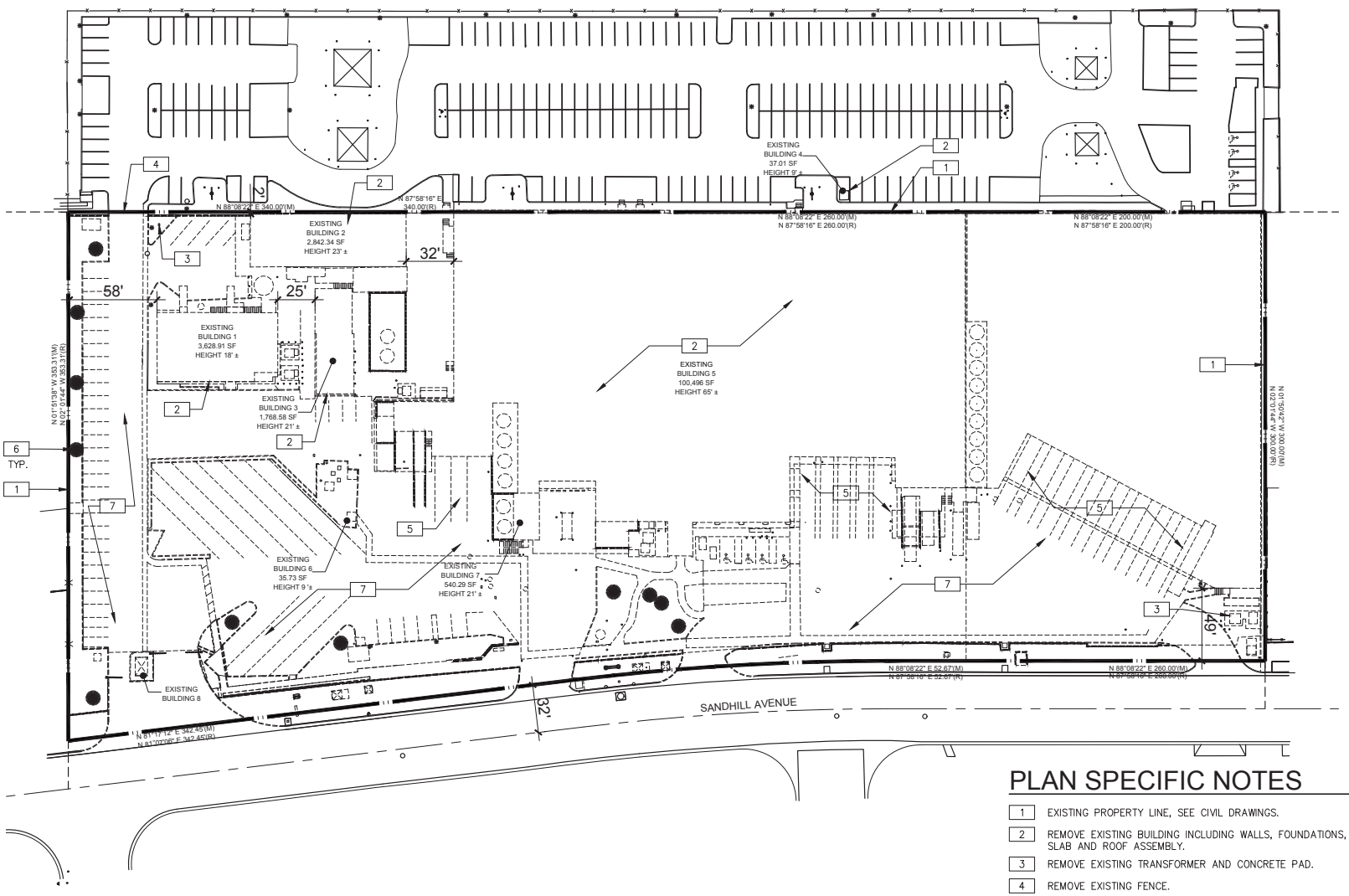
The proposed project would include approximately 32,593 sf of landscaping along the frontage of East Sandhill Avenue and along the perimeter of the project site. As shown in **Figure 2-5a**, *Landscape Plan*, and **Figure 2-5b**, *Preliminary Planting*, a variety of ornamental trees and shrubs, which would be varying in height, would be included as a part of the proposed project. The proposed project would not include any work within the existing SCE easement.

SOURCE: ESRI Imagery, 2020

1055 E. Sandhill Avenue Project

Figure 2-1
Project Site and Regional Location

ESA



PLAN SPECIFIC NOTES

1. EXISTING PROPERTY LINE, SEE CIVIL DRAWINGS.
2. REMOVE EXISTING BUILDING INCLUDING WALLS, FOUNDATIONS, CONCRETE SLAB AND ROOF ASSEMBLY.
3. REMOVE EXISTING TRANSFORMER AND CONCRETE PAD.
4. REMOVE EXISTING FENCE.
5. REMOVE EXISTING CONCRETE DOCKS AND LANDINGS.
6. REMOVE EXISTING TREES.
7. REMOVE EXISTING PAVING.

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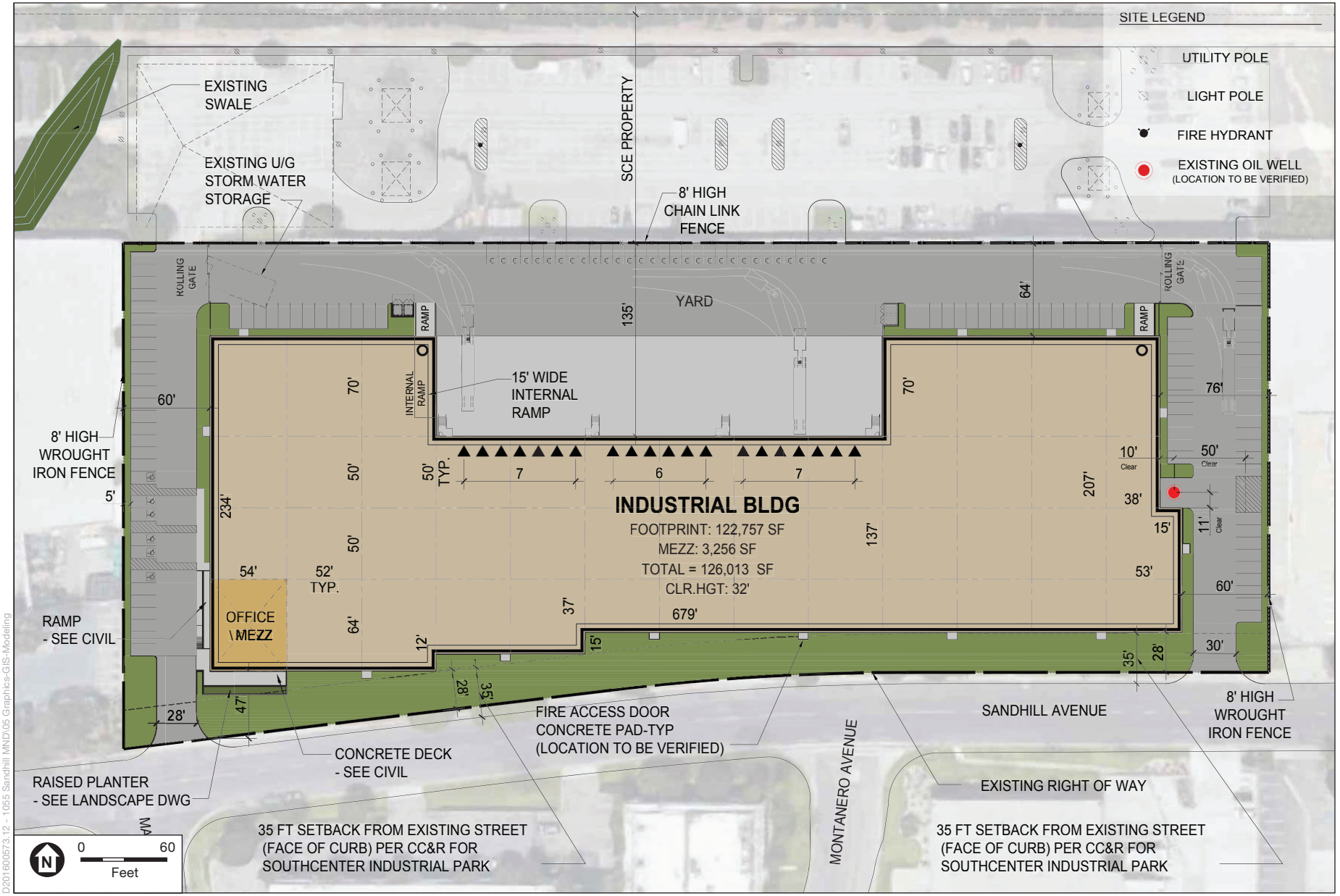
SOURCE: Ware Malcomb, 2020

1055 E. Sandhill Avenue Project

Figure 2-2
Existing Conditions

ESA



SOURCE: Ware Malcomb, 2020

1055 E. Sandhill Avenue Project

Figure 2-3
Site Plan

ESA

KEYNOTES

1. **PAINT CONCRETE TILT UP PANEL**
   PPG "WILLOW SPRINGS" 1007-01
2. **PAINT CONCRETE TILT UP PANEL**
   PPG "GHOST WRITER" 1007-03
3. **PAINT CONCRETE TILT UP PANEL**
   SHERWIN WILLIAMS "PEPPERCORN" 7674
4. **PAINT CONCRETE TILT UP PANEL**
   BEHR "INFINITE DEEP SEA" S500-7
5. **HIGH PERFORMANCE GLAZING**
   VITRO OPTIBLUE
6. **MULLIONS**
   CLEAR ANODIZED
7. **ENTRY CANOPY**
   ALUMINUM TUBE PAINTED DARK CHARCOAL GRAY
8. **CLERESTORY WINDOWS**
9. **EQUIPMENT SCREENING BY BUILDING PARAPET**

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SOURCE: Ware Malcomb, 2020

1055 E. Sandhill Avenue Project

Figure 2-4
Conceptual Rendering

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PRELIMINARY PLANTING LEGEND

SYMBOL	BOTANICAL / COMMON NAME	SIZE	PLANT FUNCTION
PROPOSED TREES			
	CERCIS OCCIDENTALIS / WESTERN REDBUD	24" BOX STANDARD	FLOWERING ACCENT TREE
	GEIJERA PARVIFOLIA / AUSTRALIAN WILLOW	24" BOX STANDARD	PARKING LOT SHADE TREE
	TRISTANIA CONFERTA / BRISBANE BOX	24" BOX STANDARD	TALL EVERGREEN SCREENING TREE
	KOELREUTERIA PANICULATA / GOLDEN RAIN TREE	24" BOX STANDARD	PARKING LOT SHADE TREE
	QUERCUS AGRIFOLIA / COAST LIVE OAK	24" BOX STANDARD	EVERGREEN SHADE TREE
	MAGNOLIA GRANDIFLORA / SOUTHERN MAGNOLIA	24" BOX STANDARD	EVERGREEN SHADE TREE

SYMBOL	BOTANICAL / COMMON NAME	SIZE
PROPOSED SHRUBS		
	ACHILLEA 'MOONSHINE' / YARROW	1 GAL / 30" O.C.
	AGAVE DESMETTIANA / DWARF AGAVE	1 GAL / 36" O.C.
	LAVENDULA DENTATA / FRENCH LAVENDER	1 GAL / 30" O.C.
	CALLISTEMON 'LITTLE JOHN' / DWARF BOTTLE BRUSH	1 GAL / 30" O.C.
	DIANELLA T. 'SILVER STREAK' / SILVER STREAK FLAX LILY	5 GAL / 36" O.C.
	GAURA LINDHEIMERI 'SISKIYOU PINK' / SISKIYOU PINK GAURA	5 GAL / 36" O.C.
	HEMEROCALLIS SP. / DAYLILY	1 GAL / 24" O.C.
	LEUCOPHYLLUM FRUTESCENS / TEXAS RANGER	5 GAL / 36" O.C.
	DIETES VEGETA / FORTNIGHT LILY	5 GAL / 36" O.C.
	PENNISETUM ALOEPECUROIDES / BLACK PENNISETUM	1 GAL / 36" O.C.
	PHORMIUM T. 'SURFER' / SURFER NEW ZEALAND FLAX	5 GAL / 36" O.C.
	SALVIA GREGII 'FURHMAN'S RED' / FURHMANS RED SAGE	1 GAL / 30" O.C.
	WESTRINGIA FRUTICOSA / COAST ROSEMARY	5 GAL / 42" O.C.
PROPOSED GROUNDCOVER & VINES		
	ROSA X 'FLOWERING CARPET' / FLOWERING CARPET ROSE - PINK	1 GAL / 30" O.C.
	ROSMARINUS O. 'PROSTRATUS' / PROSTRATE ROSEMARY	1 GAL / 30" O.C.
	LANTANA CAMARA / COMMON LANTANA	5 GAL / 36" O.C.
	MYOPORUM PARVIFOLIUM / MYOPORUM	1 GAL / 36" O.C.

TOTAL LANDSCAPE AREA PROVIDED: 32,907 SF
TOTAL SITE AREA: 252,207 SF
TOTAL LANDSCAPE COVERAGE: 13.0%

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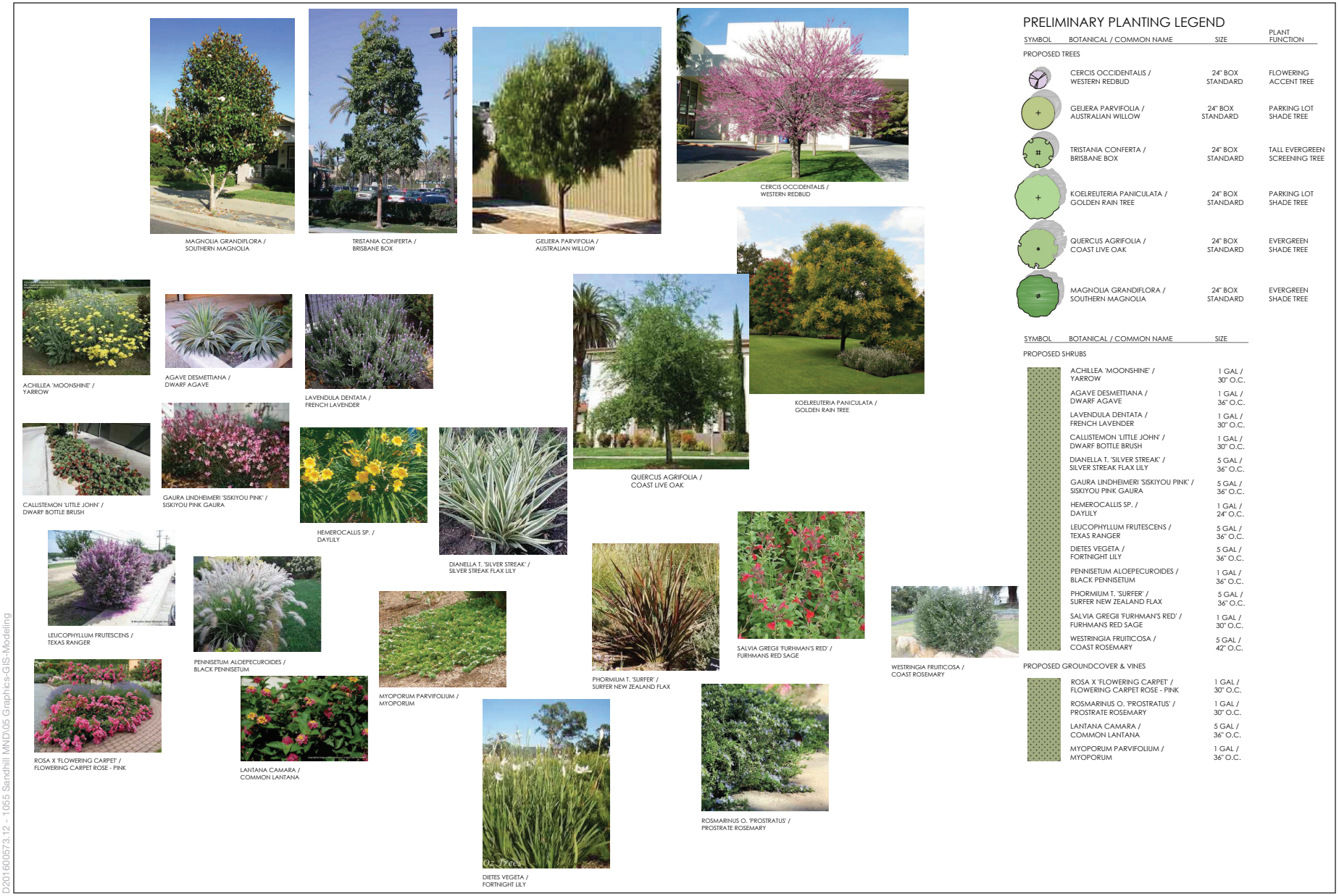
SOURCE: Ware Malcomb, 2020

1055 E. Sandhill Avenue Project

Figure 2-5a
Landscape Plan

ESA



D2016005 73.12 - 1055 Sandhill MND\05 Graphics-GIS-Modeling

SOURCE: Ware Malcomb, 2020

1055 E. Sandhill Avenue Project

Figure 2-5b
Preliminary Planting

ESA

2.4 Project Construction

Project construction is anticipated to start in July 2021, commencing with removal of the existing asphalt and warehouse facilities, followed by approximately one month of soil compaction. Construction would be completed in 4 phases over an estimated 1-year period, 2 months for demolition, 1.5 months for grading and excavation, 8 months for building construction and 1.5 months for finishing painting. Project construction would include the removal of the existing parking lot, cutoff of existing utilities, demolition of structures, crushing of the asphalt surface, and soil compaction.

The project would generate off-site traffic during the initial delivery of construction vehicles and equipment to the project site, the daily arrival and departure of construction workers, and the delivery of materials throughout the construction period and removal of construction debris. Deliveries would generally include shipments of concrete, lumber, and other building materials for onsite structures, utilities (e.g., plumbing equipment and electrical supplies) and paving and landscaping materials.

2.5 Project Operations

During project operation, 194 employees, comprised of dock employees and clerical personnel, would be onsite.[1] Typical daily operational traffic would consist of inbound freight arriving for processing, transfer of materials to the appropriate trucks, and outbound freight departing the project site. In addition, inbound freight arriving for processing may transfer materials to an appropriate storage area within the facility for a delivery scheduled for a later date, which may result in an accumulation of freight vehicles on the project site until the next delivery goes out. Peak dispatch for freight delivery to and from the project site would occur during the hours of 7 a.m. to 6 p.m.

2.6 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. 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:

Approval or certification of the appropriate CEQA document

Approval of Design Overlay Review (DOR) no. 1831-2020

[1] Operational employees calculated based-on generation rates by use. LAUSD, 2020. 119,501 sf warehouse uses x 0.00135 employees per sf = approximately 162 employees. 6,512 sf office uses x 0.00479 employees per sf = approximately 32 employees. 162 employees + 32 employees = 194 employees. https://achieve.lausd.net/cms/lib/CA01000043/Centricity/Domain/921/LAUSD%20Dev%20Fee%20Study%202020_Final.pdf.

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CHAPTER 3
Environmental Checklist

I. Aesthetics

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

Discussion

a) The project site is currently developed with existing warehouse facilities that receive, store, and ship various packaged materials for manufactures and distributors. According to the City of Carson General Plan EIR, there are no officially designated scenic vistas or scenic highways within Carson (City of Carson 2002). Furthermore, the project site is within an established industrial area, and the proposed project would develop similar uses to those that currently exist and, thus, would not change the visual character of the project site. Therefore, no impact would occur.

b) 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 2020). Furthermore, according to the City of Carson General Plan EIR, there are no officially designated scenic vistas or scenic highways within Carson (City of Carson 2002). Therefore, no impact to scenic resources within a state scenic highway would occur.

c) Given the project's location in an urbanized area, project implementation would result in a significant impact if the proposed project would conflict with applicable zoning and

other regulations governing scenic quality. The project site is designated as Light Industrial land use and zoned as Manufacturing – Light (M-L) and the current uses onsite are consistent with this industrial use. Implementation of the project would require the demolition of existing industrial uses onsite; however, the project would construct industrial uses with similar bulk and scale at a maximum height of 32 feet and would be similar to the maximum height of the existing structures (30 feet at Building 8). Furthermore, the project would be required to comply with City's Industrial Zone Site Development Standards (Municipal Code section 9146), which contains building requirements for structures, frontages, and landscaping. As a result, the proposed project would be consistent with the City of Carson's Municipal Code (CMC).

The City of Carson's General Plan Land Use Element contains policies and regulations governing scenic quality and visual aesthetics for the City. Although there are no regulations within the General Plan regarding industrial development, Goal LU-3 provides for the removal of incompatible and non-conforming uses that detract from the aesthetics and safety of the community. The project would continue to be compatible with zoning and design regulations within the City for Light Industrial uses and would adhere to all height, frontage, and zoning requirements that may be required to maintain aesthetic compatibility. As discussed above, all building materials would be neutral tone and landscaping would be provided to screen all structures and provide visual continuity within the area. Therefore, the project would not conflict with zoning or regulations governing scenic quality and there would be no impact.

d) The project site is located within an urbanized area and within a larger industrial park where typical sources from glare are caused by the reflection of sunlight or artificial light by highly polished surfaces such as window glass or reflective materials. In addition, existing industrial buildings and complexes surrounding the project site typically include nighttime security and wayfinding lighting such that typically emanate from building interiors, passes through windows, and light from outdoor sources, such as street lighting, parking lot lighting, building illumination, and vehicles. Light-sensitive residential uses are located north of the project site, north of the SCE easement and a parking lot. Implementation of the project would continue to provide sources of nighttime lighting onto the project site as a result of installation of new exterior light fixtures that are generally required for security, wayfinding, and aesthetic purposes. Pursuant to CMC section 9127.1, all exterior lighting installed on the project site must be directed away from all adjoining and nearby residential property, and arranged and controlled so it would not create a nuisance or hazard to traffic or to the living environment. As such, all exterior lighting would be shielded and/or recessed to reduce light trespass (i.e., excessive or unwanted light generated on one property illuminating another property). As such, based on compliance with local requirements, impacts associated with light and nighttime glare would be less than significant.

II. Agriculture and Forestry Resources

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

Discussion

a) The project site is located within the City of Carson and is currently developed with eight warehouses that served as a refrigerated food production plant for General Mills Inc. The project site is not zoned for agricultural uses and no agricultural uses or related operations are present on the project site or in the surrounding 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 2020). Therefore, no impact would occur from conversion of Farmland to non-agricultural uses.

b) The project site is designated as Light Industrial in the City of Carson's General Plan Land Use Map with a corresponding zoning of ML (Manufacturing, Light) (City of Carson 2004). 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 and no impact would occur.

c) As discussed previously, the project site is zoned ML and is designated as Light Industrial on the City of Carson's General Land Plan Land Use Map (City of Carson 2004). The project site is currently developed with existing warehouse facilities, associated office/administrative facilities, loading docks, and surface parking. No forestland or timberland uses are located in the project site's urban, industrial setting or vicinity. Therefore, no impact would occur to zoning for forestland or timberland.

d) As discussed above, the project site 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 vicinity. Therefore, no impact would occur to forestland or timberland.

e) 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 in the vicinity of the project site. Therefore, no impact would occur from a conversion of farmland to a non-agricultural use.

III. Air Quality

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

Discussion

a) ***Regulatory Background***

The proposed project is located within the 6,745-square-mile South Coast Air Basin (Basin). Air quality planning for the Basin is under the jurisdiction of the South Coast Air Quality Management District (SCAQMD). SCAQMD is the agency principally responsible for comprehensive air pollution control in the Air Basin. The Basin is subject to the SCAQMD's Air Quality Management Plan (AQMP), which contains a comprehensive list of pollution control strategies directed at reducing emissions from stationary sources and on-road and off-road mobile sources, and achieving ambient air quality standards. These strategies are developed, in part, based on regional population, housing, and employment projections prepared by the Southern California Association of Governments (SCAG). As part of its air quality planning, SCAG has prepared the Regional Comprehensive Plan (RCP) and Guide and the Regional Transportation Program/Sustainable Communities Strategy (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 proposed project would be subject to the SCAQMD's AQMP.

The SCAQMD's 2016 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 (SCAQMD 2016). The SCAQMD is required, pursuant to the Clean Air Act, to reduce emissions of criteria pollutants for which the Basin is in non-attainment for the National Ambient Air Quality Standards (NAAQS) (e.g., ozone [O_3], and particulate matter 2.5 microns in diameter or less [PM2.5]). Projects that are consistent with the assumptions used in the AQMP do not interfere with attainment because the associated growth with the projects are 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 would individually exceed the SCAQMD's regional significant thresholds. The SCAQMD's 2016 AQMP contains a comprehensive list of pollution control strategies directed at reducing emissions and achieving the NAAQS and includes transportation control strategies designed to reduce vehicle miles traveled (VMT). SCAQMD's 2016 AQMP control strategies were developed, in part, based on regional growth projections prepared by SCAG through 2040. While SCAG's Regional Council adopted the 2020–2045 RTP/SCS on September 3, 2020, SCAQMD's 2016 AQMP is based on growth projections and control strategies from the 2016–2040 RTP/SCS. For this reason, consistency with the 2016–2040 SCAG RTP/SCS remains the appropriate version when discussing a project's consistency with the SCAQMD's 2016 AQMP.

The project's consistency with applicable air quality plans is provided below. There are no applicable numerical thresholds of significance for this consistency analysis. In accordance with the SCAQMD's CEQA Air Quality Handbook, the following criteria were used to evaluate the project's consistency with the SCAQMD's 2016 AQMP:

Criterion 1: Will the project result in any of the following:

- An increase in the frequency or severity of existing air quality violations; or
- Cause or contribute to new air quality violations; or
- Delay timely attainment of air quality standards or the interim emission reductions specified in the AQMP.

Criterion 2: Will the project exceed the assumptions utilized in preparing the AQMP?

The project's potential impacts with respect to these criteria are discussed to assess the consistency with the SCAQMD's 2016 AQMP.

Criterion 1

With respect to the first criterion, as discussed under the analysis for Threshold c below, localized concentrations of the criteria air pollutants nitrogen dioxide (NO_2) analyzed as nitrogen oxides (NO_X), carbon monoxide (CO), respirable particulate matter (PM10), and fine particulate matter (PM2.5) have been analyzed for the project. Sulfur dioxide (SO_2) emissions would be negligible during construction and long-term operations and, therefore, would not have the potential to cause or effect a violation of the SO_2 ambient air quality standard. Since volatile organic compounds (VOCs) are not a criteria pollutant, there is no ambient standard or localized threshold for VOCs. However, due to the role VOCs play in O_3 formation, it is classified as a precursor pollutant, and only a regional emissions threshold has been established. The project's NO_X, CO, PM10, and PM2.5 emissions during construction and operations were analyzed: (1) to ascertain potential effects on localized concentrations; and (2) to determine if there is a potential for such emissions to cause or effect a violation of the ambient air quality standards for NO_2, CO, PM10, and PM2.5. As shown in **Tables 6 through 9** in Threshold c,

construction of the project would not result in localized emissions that exceed the concentration-based SCAQMD localized significance thresholds for the criteria air pollutants at sensitive receptors in proximity to the project site with the exception of the 1-hour NO_2 concentration, which could exceed the significance threshold (the 1-hr NAAQS). As shown in **Table 11** in Threshold c, mitigation measure MM-AQ-1 would reduce the maximum localized 1-hour NO_2 concentrations to below the significance threshold. As shown in **Tables 13 through 16** in Threshold c, operation of the project would not result in localized emissions that exceed the concentration-based SCAQMD localized significance thresholds for NO_2, CO, PM10, and PM2.5 at sensitive receptors in proximity to the project site.

The project would not introduce any substantial stationary sources of emissions; therefore, CO is the appropriate benchmark pollutant for assessing local area air quality impacts from motor vehicle operations.[2] As indicated below in Threshold c, no intersections would result in a CO hotspot in excess of the ambient air quality standards, and impacts would be less than significant. Therefore, the project would not increase the frequency or severity of an existing CO violation or cause or contribute to new CO violations.

Therefore, in response to Criterion 1, the project would not increase the frequency or severity of an existing violation or cause or contribute to new violations for ozone. Impacts regarding the timely attainment of air quality standards or interim emission reductions specified in the AQMP and impacts would be less than significant.

Criterion 2

With respect to the second criterion for determining consistency with AQMP growth assumptions, the projections in the AQMP for achieving air quality goals are based on assumptions in SCAG's 2016–2040 RTP/SCS regarding population, housing, and growth trends. Determining whether or not a project exceeds the assumptions reflected in the AQMP involves the evaluation of consistency with applicable population, housing, and employment growth projections and appropriate incorporation of AQMP control measures. The following discussion provides an analysis with respect to these criteria.

Air Quality Management Plan Consistency

The project would not obstruct implementation of the 2016 AQMP for, as discussed below, its construction and operational emissions would be less than significant. Implementation of mitigation measure MM-AQ-1 would reduce the project's construction emissions such that the maximum localized 1-hour NO_2 concentrations would be below the significance threshold. The project would comply with applicable required fleet rules and control strategies to reduce on-road truck emissions (i.e., 13 CCR, section 2025 [CARB Truck and Bus regulation]), and other applicable SCAQMD rules specified and incorporated in the 2016 AQMP. As discussed above, projects, uses, and

[2] SCAQMD, *CEQA Air Quality Handbook*, Chapter 12, Assessing Consistency with Applicable Regional Plans, April 1993.

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. As discussed below, compliance with the applicable required fleet rules and control strategies and requirements would render it consistent with, and meet or exceed, the AQMP requirements for control strategies intended to reduce emissions from construction equipment and activities. Thus, the project's criteria pollutant emissions would not cause the Air Basin's criteria pollutant emissions to worsen so as to impede the SCAQMD's efforts to achieve attainment with respect to any criteria pollutant for which it is currently not in attainment of the NAAQS and CAAQS (e.g., ozone, PM10, and PM2.5),[3] or to cause the Air Basin to deteriorate from its current attainment status with respect to any other criteria pollutant emissions.

As further discussed below, the project is also consistent with the 2016 AQMP. The project incorporates into its design appropriate control strategies set forth in the 2016 AQMP for achieving its emission reduction goals, and would be consistent with the demographic and economic assumptions upon which the plan is based.

Construction

Control Strategies

During its construction phase, the project would ensure compliance with CARB's requirements to minimize short-term emissions from on-road and off-road diesel equipment, and with SCAQMD's regulations such as Rule 403 for controlling fugitive dust and Rule 1113 for controlling VOC emissions from architectural coatings. Compliance with these regulatory measures and requirements would be consistent with and meet or exceed the AQMP requirements for control strategies intended to reduce emissions from construction equipment and activities.

Growth Projections

The project would generate short-term construction jobs, but these jobs would not necessarily bring new construction workers or their families into the region, since construction workers are typically drawn from an existing regional pool who travel among construction sites within the region. Construction workers are not typically brought from other regions to work on developments such as the project. Moreover, these jobs would be relatively small in number and temporary in nature. Therefore, the project's construction jobs would not conflict with the long-term employment or population projections upon which the 2016 AQMP is based.

[3] The Los Angeles County portion of the Air Basin is designated as nonattainment for the federal lead standard; however, this was due to localized emissions from two lead-acid battery recycling facilities in the City of Vernon and the City of Industry that are no longer operating. For reference see South Coast Air Quality Management District, Board Meeting, Agenda No. 30, Adopt the 2012 Lead State Implementation Plan for Los Angeles County, May 4, 2012.

Operations

Control Strategies and Policy Consistency

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 project site is designated as Light Industrial land use and zoned as Manufacturing – Light (M-L). The proposed project would include a 126,013 sf warehouse building, with approximately 119,501 sf of warehouse, 6,512 sf of office space, and a 3,256 sf mezzanine. In addition, the proposed project would include approximately 20 dock high-truck doors and two at grade truck/forklift doors, which would allow transportation of goods to and from the project site. The project site is bound by a SCE easement to the north, existing industrial uses to the east and west, and East Sandhill Avenue to the south. Immediately adjacent to the project site on east, west, and south are properties that support similar industrial and/or manufacturing uses. Similar to the project site, the surrounding land uses are also designated with Light Industrial land uses and are zoned as M-L. SCAG predicted Carson's employment growth between 2012 and 2040 to be 11,200 jobs (SCAG 2016).

Growth Projections

The estimated 194 new 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 628 daily vehicle trips (including passenger cars, 2-axle, 3-axle and 4+-axle trucks), which would include up to 91 AM peak hour trips to drop off and/or pickup products from the site, 81 PM peak hour trips to drop off and pick up products, employee trips, and other miscellaneous vehicle trips (Translutions Inc. 2021). As discussed in Section XVII, *Transportation*, this project does not have a significant impact on transportation or traffic in the project vicinity. However, the number of daily truck trips and VMT from those trucks do have the potential to result in operational emissions. Mobile source emissions associated with the project site were calculated and are discussed in Threshold b, below.

As discussed above under Methodology, 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 reductions identified in the AQMP. Based on the above, the project would not conflict with growth projections in the 2016 AQMP and impacts would be less than significant.

b) As indicated above, the project site is in the South Coast Air Basin. State and federal air quality standards are exceeded in many parts of the Basin for ozone (O_3) and PM2.5, including those monitoring stations nearest to the project area, and is designated a State and federal non-attainment area for these pollutants. The Basin is also designated as a State non-attainment area for PM10. The project would contribute to local and regional

air pollutant emissions during construction (short-term or temporary). However, based on the following analysis, construction and operation of the proposed project would result in less-than-significant impacts relative to the daily significance thresholds for criteria air pollutant emissions established by the SCAQMD for construction and operational phases.

Daily regional construction and operational source project ozone precursor and criteria pollutant emissions such as VOC, NO_X, CO, SO_2, PM10, and PM2.5 were estimated using the CalEEMod (Version 2016.3.2) software, an emissions inventory software program recommended by SCAQMD. CalEEMod is based on outputs from the CARB OFFROAD model and the CARB on-road vehicle emissions factor (EMFAC) model, which are emissions estimation models developed by CARB and used to calculate emissions from construction activities, heavy-duty off-road equipment, and on-road vehicles. Emissions from on-road vehicles were estimated outside of CalEEMod using EMFAC2017 emission factors for haul and material vendor trucks and worker vehicles. Activities parameters, such as number of pieces of equipment and equipment usage hours were provided by the Applicant.

Construction

Construction activities associated with the project would generate temporary and short-term emissions of VOC, NO_X, CO, SO_2, PM10, and PM2.5. Construction related emissions are expected from demolition, excavation, grading, and building construction activities. During the demolition phase approximately 27,196 cubic yards (cy) (19,039 cy accounting for 30 percent shrinkage) of demolition debris would be generated with approximately 16,980 cy being used as fill during the grading phase. Approximately 103 trucks (206 truck trips) would be required to export approximately 2,059 cy of remaining demolition debris. No soil is anticipated to be exported from the project site. Project construction is expected to commence in July 2021 and would last through July 2022. If project construction commences later than the anticipated start date, air quality impacts would be less than those analyzed herein, because a more energy-efficient and cleaner burning construction equipment fleet mix would be expected in the future, pursuant to State regulations that require construction equipment fleet operators to phase-in less polluting heavy-duty equipment. Therefore, air quality impacts would generally be less than those analyzed herein due to the likelihood of less emissions generated in a day.

The duration of construction activity and associated equipment represents a reasonable approximation of the expected construction fleet as required per CEQA guidelines. Site specific construction fleet may vary due to specific project needs at the time of construction. The duration of construction activity and associated construction equipment was estimated based on consultation with the Applicant. A detailed summary of construction equipment assumptions by phase is provided in the modeling files in Appendix A.

Construction of the project is estimated to last approximately 12.5 months. Construction duration by phase is provided in **Table 2**, *Estimated Construction Schedule*. The duration of construction activity and associated equipment represents a reasonable approximation

of the expected construction fleet as required per CEQA Guidelines. Site-specific construction fleet may vary due to specific project needs at the time of construction. The duration of construction activity and associated construction equipment was estimated based on consultation with the Applicant.

TABLE 2
ESTIMATED CONSTRUCTION SCHEDULE

Activity	Start Date	End Date	Duration (Work Days)
Demolition	07/01/2021	08/31/2021	44
Grading/Excavation	08/01/2021	09/15/2021	33
Building Construction	10/01/2021	05/31/2022	173
Architectural Coatings	06/01/2022	07/15/2022	22

SOURCE: City of Carson 2021, in consultation with the Applicant

The maximum daily regional emissions from these activities are estimated by construction phase and compared to the SCAQMD significance thresholds. Maximum daily emissions are calculated by taking the sum of the overlapping phases for each criteria pollutant. As shown in **Table 3**, *Maximum Regional Construction Emissions – Without Mitigation (Pounds per Day)*, emissions resulting from project construction would not exceed any criteria pollutant thresholds established by the SCAQMD. Therefore, impacts would be considered less than significant, and no mitigation is required.

TABLE 3
MAXIMUM REGIONAL CONSTRUCTION EMISSIONS – WITHOUT MITIGATION (POUNDS PER DAY)

	Emissions (pounds per day)					
Year	**VOC**	**NO_X**	**CO**	**SO_X**	**PM10**	**PM2.5**
Construction Phases						
Demolition – 2021	3	33	23	<1	8	2
Grading – 2021	2	25	16	<1	4	2
Building Construction – 2021	2	22	22	<1	2	1
Building Construction – 2022	2	19	22	<1	2	1
Architectural Coating – 2022	36	1	2	<1	<1	<1
Overlapping Phases						
Demolition + Grading – 2021	6	58	39	<1	12	5
Maximum Daily Regional Emissions	***36***	***58***	***39***	***<1***	***12***	***5***
SCAQMD Regional Threshold	75	100	550	150	150	55
Threshold Exceeded?	No	No	No	No	No	No

NOTE:
Totals may not add up exactly due to rounding in the modeling calculations. See Appendix A for details.
SOURCE: ESA 2021

Operation

The proposed project is a warehouse with office spaces and a mezzanine. The proposed project would include 20 truck loading docks and a surface parking lot with 130 vehicle parking spaces. The products are moved within the facility via electric powered forklifts.[4] During operation of the project, the primary emission sources would consist of mobile sources, energy use from site operations, and routine maintenance of facilities. In addition, emissions would result from natural gas combustion for heating and area sources on-site such as landscaping equipment, and the use of consumer products for cleaning.

Operational emissions for the project were estimated using CalEEMod for the land uses proposed by the project (2022 project buildout) (see Appendix A for compiled detailed assumptions, calculations, and modeling outputs). Mobile source emissions are based on the vehicle emission factors from EMFAC2017 and the default trip length values for the project land uses in CalEEMod, which are Air District-wide average trip distance values. Daily trip generation from the project's Trip Generation Analysis, provided in Appendix F, were used to estimate the total VMT for existing trips and proposed project trips (Translutions Inc. 2021).

Other sources of emissions from operation of the existing site uses and proposed project uses include equipment used to maintain landscaping, such as lawnmowers and trimmers. The CalEEMod tool uses landscaping equipment greenhouse gas (GHG) emission factors from the CARB OFFROAD model and the CARB Technical Memo: Change in Population and Activity Factors for Lawn and Garden Equipment (CARB 2003). The CalEEMod software estimates that landscaping equipment operate for 250 days per year in the Air Basin. Emissions of VOCs from the use of consumer products and architectural coatings are based on SCAQMD-specific emission factors for land uses in the Air Basin.

Operational-source emissions are summarized in **Table 4**, *Maximum Unmitigated Regional Operational Emissions (Pounds per Day)*. As shown, project operational-source emissions are below the applicable SCAQMD regional thresholds of significance. Therefore, impacts would be considered less than significant, and no mitigation is required.

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 California Clean Air Acts. As discussed earlier, the SCAQMD has developed a comprehensive plan, the 2016 AQMP, which addresses the region's cumulative air quality condition.

[4] Since forklifts used during project operations are electric, they would not generate criteria air pollutant emissions. Electricity consumption and associated GHG emissions by project operational forklifts is accounted for below in checklist sections Energy and Greenhouse Gas Emissions, respectively.

TABLE 4
MAXIMUM UNMITIGATED REGIONAL OPERATIONAL EMISSIONS (POUNDS PER DAY)

	Emissions (pounds per day)					
Source	**VOC**	**NO_X**	**CO**	**SO_X**	**PM10**	**PM2.5**
Area (Consumer Products, Landscaping)	3	<1	<1	0	<1	<1
Energy (Natural Gas)	<1	1	1	<1	<1	<1
Motor Vehicles	2	14	19	<1	6	2
Total Project On-Site and Off-Site Emissions	***5***	***14***	***19***	***<1***	***6***	***2***
Existing On-Site and Off-Site Emissions	5	16	19	<1	4	1
Net On-Site and Off-Site Emissions	***<1***	***-1***	***-<1***	***<1***	***2***	***1***
SCAQMD Regional Threshold	55	55	550	150	150	55
Threshold Exceeded?	No	No	No	No	No	No

NOTES:

Totals may not add up exactly due to rounding in the modeling calculations. See Appendix A for details

Negative net values of NO_X and CO largely come as a result of existing mobile emissions where the existing vehicle fleet in year 2020 has higher emission factors than the vehicle fleet used for project mobile emissions during the operational buildout year of 2022. See Appendix A for details.

SOURCE: ESA 2021

A significant impact may occur if a project were to add a cumulatively considerable contribution of a federal or state non-attainment pollutant. The Basin is currently in non-attainment for ozone (federal and state standards), PM10 (state standards only) and PM2.5 (federal and state standards); therefore, 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 SCAQMD. In particular, CEQA Guidelines section 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 2016 AQMP. As discussed previously under Threshold a above, the project would be consistent with the

2016 AQMP and would not have a cumulatively considerable air quality impact. Although the project's employment would increase compared to existing conditions, this growth would be well within the employment projections for the City.

As the project is not part of an ongoing regulatory program, the SCAQMD also recommends that project-specific air quality impacts be used to determine the potential cumulative impacts to regional air quality. As shown in **Table 3** and **Table 4**, peak daily emissions of construction and operation-related pollutants would not exceed SCAQMD regional significance thresholds. By applying SCAQMD's cumulative air quality impact methodology, even though implementation of the project would result in an addition of criteria pollutants, in conjunction with related projects in the region, cumulatively significant impacts would not occur. Therefore, the emissions of non-attainment pollutants and precursors generated by the project would be less than significant and would not result in a cumulatively considerable air quality impact.

c) According to the SCAQMD CEQA Air Quality Handbook, sensitive receptors include residences, schools, playgrounds, childcare centers, athletic facilities, long-term health care facilities, rehabilitation centers, convalescent centers, and retirement homes.

The localized effects from the on-site portion of the emissions are evaluated at nearby sensitive receptor locations potentially impacted by the proposed project 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, which may be used for sites greater than 5 acres or for projects that exceed the screening tables, as appropriate (SCAQMD 2008). LSTs represent the maximum emissions from a project site that are not expected to result in an exceedance of a NAAQS or CAAQS.

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 Central Los Angeles County monitoring station (SRA 12). Since the total acreage disturbed is over 5 acres, dispersion modeling using the U.S. Environmental Protection Agency (USEPA)-approved AERMOD dispersion model was used to evaluate localized air quality impacts from the project.

The nearest sensitive receptor is the residential community located approximately 160 feet (48 meters) to the north of the project area along West Billings Street. 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.

In order to compare the project impacts to the NO_X and CO ambient air quality standard, the local background concentrations had to be determined. These background concentrations were gathered from SCAQMD Air Quality Data for the most-recent 5 years, 2015 through 2019. The maximum modeled air concentrations were added to background concentrations to determine significance relative to the ambient air quality standards.

Construction Emissions

Localized Construction Emissions

Table 5, *Unmitigated Maximum Daily Localized Construction Emissions*, presents the localized emissions from on-site equipment during the construction of the proposed project, located 160 feet north of the project site, in the vicinity of the project area without mitigation.

TABLE 5
MAXIMUM DAILY LOCALIZED CONSTRUCTION EMISSIONS

	Emissions (pounds per day)			
Year	**NO_X**	**CO**	**PM10**	**PM2.5**
Construction Phases				
Demolition – 2021	31	22	8	2
Grading – 2021	25	16	4	2
Building Construction – 2021	17	17	1	1
Building Construction – 2022	16	16	1	1
Architectural Coating – 2023	1	2	<1	<1
Overlapping Phases				
Demolition + Grading – 2021	56	37	11	5
Maximum Daily Emissions	***56***	***37***	***11***	***5***

NOTE:
Totals may not add up exactly due to rounding in the modeling calculations. See Appendix A for details
SOURCE: ESA 2021

Because the project site is greater than 5 acres, air dispersion modeling was also performed for the significance determination. The modeled impacts for NO_2, CO, PM10 and PM2.5 were determined and compared to the corresponding significance threshold,

as discussed above. The unmitigated results for construction impacts are presented in **Tables 6 through 9**, below.

TABLE 6
LOCALIZED MODELED CONSTRUCTION, UNMITIGATED NO_2 IMPACTS UNMITIGATED

Pollutant	Averaging Period	Background (µg/m³)	Project (µg/m³)	Project + Background (µg/m³)	CAAQS (µg/m³)	NAAQS (µg/m³)
NO_2	1-Hour (H1H)	141.1	96.3	237.4	339	N/A
	1-Hour (H8H)	110.1	87.2	197.3	N/A	188
	Annual	29.3	2.68	31.9	57	100

NOTES:
H1H – highest 1-hour; H8H – highest 8-hour
SOURCE: ESA 2021

TABLE 7
LOCALIZED MODELED CONSTRUCTION, UNMITIGATED CO IMPACTS

Pollutant	Averaging Period	Background (µg/m³)	Project (µg/m³)	Project + Background (µg/m³)	CAAQS (µg/m³)	NAAQS (µg/m³)
CO	1-Hour (H1H)	5349	339	5688	23,000	N/A
	1-Hour (H2H)	5349	125	5474	N/A	40,000
	8-Hour (H1H)	4229	252	4481	10,000	N/A
	8-Hour (H2H)	4229	94	4323	N/A	10,000

NOTES:
H1H – highest 1-hour; H8H – highest 8-hour
SOURCE: ESA 2021

TABLE 8
LOCALIZED MODELED CONSTRUCTION, UNMITIGATED PM10 IMPACTS

Pollutant	Averaging Period	Background (µg/m³)	Project (µg/m³)	Project + Background (µg/m³)	CAAQS (µg/m³)	NAAQS (µg/m³)
PM10	24-Hour (H1H)	n/a	10.16	10.16	10.4	N/A
	Annual	n/a	0.53	0.53	1	N/A

NOTES:
H1H – highest 1-hour; H8H – highest 8-hour
SOURCE: ESA 2021

TABLE 9
LOCALIZED MODELED CONSTRUCTION, UNMITIGATED PM2.5 IMPACTS

Pollutant	Averaging Period	Background (µg/m³)	Project (µg/m³)	Project + Background (µg/m³)	CAAQS (µg/m³)	NAAQS (µg/m³)
PM25	24-Hour (H1H)	n/a	4.04	4.04	10.4	N/A

NOTES:
H1H – highest 1-hour; H8H – highest 8-hour
SOURCE: ESA 2021

Based on the results summarized in **Tables 6 through 9**, the unmitigated project impacts would not exceed the localized significance thresholds for CO, PM10 and PM2.5; however, there is a potential for 1-hour NO_2 impacts to exceed the NAAQS and the LST. Therefore, mitigation would be required. As described below, MM-AQ-1 would require Tier 4 engine ratings for off-road equipment rated 50 horsepower or greater that would reduce NO_X emissions during construction activities. **Table 10** shows the localized emissions from on-site equipment during the construction of the proposed project with the incorporation of MM-AQ-1. The mitigated NO_2 impacts as determined through air dispersion modeling are provided in **Table 11**.

TABLE 10
MITIGATED MAXIMUM DAILY LOCALIZED CONSTRUCTION EMISSIONS

	Emissions (pounds per day)			
Year	NO_X	CO	PM10	PM2.5
Construction Phases				
Demolition – 2021	2	23	8	2
Grading – 2021	2	18	4	2
Building Construction – 2021	3	18	<1	<1
Building Construction – 2022	3	18	<1	<1
Architectural Coating – 2023	<1	2	<1	<1
Overlapping Phases				
Demolition + Grading – 2021	4	41	9	2
Maximum Daily Emissions	***4***	***41***	***9***	***2***

NOTE:
Totals may not add up exactly due to rounding in the modeling calculations. See Appendix A for details
SOURCE: ESA 2021

As shown in **Table 11**, the mitigated NO_2 project impacts would be reduced to below both the CAAQs and the NAAQs and, thus, below the SCAQMD LSTs; therefore, the project would be less than significant with mitigation. The application of mitigation would also reduce the emissions and modeled impacts of PM10 and PM2.5; however, those results were not presented because the unmitigated impacts would be below their respective LSTs.

TABLE 11
LOCALIZED MODELED CONSTRUCTION, MITIGATED NO_2 IMPACTS UNMITIGATED

Pollutant	Averaging Period	Background (µg/m³)	Project (µg/m³)	Project + Background (µg/m³)	CAAQS (µg/m³)	NAAQS (µg/m³)
NO_2	1-Hour (H1H)	141.1	11.2	152.3	339	N/A
	1-Hour (H8H)	110.1	10.1	120.2	N/A	188
	Annual	29.3	0.37	29.6	57	100

SOURCE: ESA 2021

Mitigation Measure

MM-AQ-1. The project shall utilize off-road diesel-powered construction equipment that meets or exceeds the California Air Resources Board (CARB) and United States Environmental Protection Agency (USEPA) Tier 4 Final off-road emissions standards or equivalent for equipment rated at 50 horsepower (hp) or greater during project construction. Such equipment shall be outfitted with Best Available Control Technology (BACT) which means a CARB certified Level 3 Diesel Particulate Filter or equivalent.

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 from area sources located on-site such as natural gas combustion from water heaters, boilers, and cooking stoves, landscaping equipment, and use of consumer products and resulting from trucks queuing and idling at the site and on-site travel. Operational forklifts used in the project warehouse would not emit criteria air pollutants as they would be electric-powered. **Table 12** 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.

TABLE 12
MAXIMUM LOCALIZED OPERATIONAL EMISSIONS

Operational Activity	NO_X	CO	PM10	PM2.5
Area	<1	<1	<1	<1
Energy (Natural Gas)	1	1	<1	<1
Truck On-Site Emissions	6	6	<1	<1
Maximum Daily Emissions	7	6	<1	<1

NOTE:
Totals may not add up exactly due to rounding in the modeling calculations. See Appendix A for details.
SOURCE: ESA 2021

Because the project site is greater than 5 acres, air dispersion modeling was also performed for the significance determination. The modeled impacts for NO_2, CO, PM10 and PM2.5 were determined and compared to the corresponding significance threshold, as discussed above. The results for operational impacts are presented in **Tables 13 through 16**.

TABLE 13
LOCALIZED MODELED OPERATION, UNMITIGATED NO2 IMPACTS

Pollutant	Averaging Period	Background (µg/m³)	Project (µg/m³)	Project + Background (µg/m³)	CAAQS (µg/m³)	NAAQS (µg/m³)
NO_2	1-Hour (H1H)	141.1	9.62	150.8	339	N/A
	1-Hour (H8H)	110.1	8.26	118.4	N/A	188
	Annual	29.3	2.12	31.4	57	100
SOURCE:	ESA 2021					

TABLE 14
LOCALIZED MODELED OPERATION, UNMITIGATED CO IMPACTS

Pollutant	Averaging Period	Background (µg/m³)	Project (µg/m³)	Project + Background (µg/m³)	CAAQS (µg/m³)	NAAQS (µg/m³)
CO	1-Hour (H1H)	5348.6	32	5381	23,000	N/A
	1-Hour (H2H)	5348.6	25	5374	N/A	40,000
	8-Hour (H1H)	4228.6	29	4258	10,000	N/A
	8-Hour (H2H)	4228.6	24	4253	N/A	10,000
SOURCE:	ESA 2021					

TABLE 15
LOCALIZED MODELED OPERATION, UNMITIGATED PM10 IMPACTS

Pollutant	Averaging Period	Background (µg/m³)	Project (µg/m³)	Project + Background (µg/m³)	CAAQS (µg/m³)	NAAQS (µg/m³)
PM10	24-Hour (H1H)	n/a	0.02	0.02	2.5	N/A
	Annual	n/a	0.01	0.01	1	N/A
SOURCE:	ESA 2021					

TABLE 16
LOCALIZED MODELED OPERATION, UNMITIGATED PM2.5 IMPACTS

Pollutant	Averaging Period	Background (µg/m³)	Project (µg/m³)	Project + Background (µg/m³)	CAAQS (µg/m³)	NAAQS (µg/m³)
PM25	24-Hour (H1H)	n/a	0.01	0.01	2.5	N/A
SOURCE:	ESA 2021					

Based on the results shown in **Tables 13 through 16**, unmitigated localized emissions from operation of the project would not exceed the localized significance thresholds. Therefore, the project results in a less than significant localized impact without mitigation for operational emissions.

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. 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, as presented in the project's Trip Generation Analysis, the project adds a total of 628 trips to the project site per day and 84 net new trips (subtracting out the 544 existing trips). Overall, the project would not cause or contribute to the formation of CO hotspots based on the AQMP's 2003 study, which estimates 100,000 vehicles per day could cause the formation of a CO hotspot. Therefore, impacts would be 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.

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 (DPM) during general construction activities, such as demolition, excavation, installation of machinery, materials transport and handling, and building construction. During operational activities, both existing and associated with the proposed project, DPM would be emitted by diesel trucks while traveling to, on, and from the site and while idling onsite.

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 include residential uses located approximately 160 feet to the north of the project site and directly east of South Avalon Boulevard which is a potential haul route to the 91 freeway during both construction and operational activities. Because it is unknown what haul

routes would be used to access the site for construction or operations, a truck route leading to the 91 freeway on and off-ramps from Avalon Boulevard and a second truck route leading to the 91 freeway at South Central Avenue were modeled. As a worst case scenario it was assumed that all trucks would take one route or the other and the maximum risk associated with the two routes was reported in the analysis.

As health risk is inherently cumulative, construction and operational emissions are combined to provide the total 30-year risk for the nearby receptors. The resulting health risk calculations were performed using a spreadsheet tool consistent with the OEHHA guidance. The spreadsheet tool incorporates the algorithms, equations, and a variable described above as well as in the OEHHA Guidance, and incorporates the results of the AERMOD dispersion model. The full methodology for the health risk assessment can be found in Appendix A.

Construction

Carcinogenic exposures, the cancer risk from DPM emissions from construction, is estimated to result in a maximum carcinogenic risk of 7.51 in one million at the residential uses directly to the north of project site and south of West Billings Street. As discussed previously, the lifetime exposure under the OEHHA Guidance takes into account early life (infant and children) exposure. The calculated cancer risk is estimated for outdoor exposure and assumes that sensitive receptors (residential uses) would not have any mitigation such as mechanical filtration and that residential uses would have continuously open windows. As the maximum impact would be less than the risk threshold of 10.0 in one million, impacts would be less than significant without mitigation.

Potential non-cancer effects of chronic (i.e., long term) DPM exposures were evaluated using the Hazard Index approach as described in the OEHHA Guidance. The maximum health hazard index associated with construction activities is 0.06 which is associated with the same receptor as the maximum carcinogenic risk. A hazard index equal to or greater than 1.0 represents a significant chronic health hazard. The project does not exceed the hazard index threshold of 1 and, therefore, the project's chronic risk impact would be less than significant.

The results for carcinogenic and chronic risk were based on the unmitigated regional emissions. Implementation of Mitigation Measure MM-AQ-1 needed to reduce localized emissions would also reduce the DPM emissions from construction. Therefore, with implementation of MM-AQ-1, carcinogenic and chronic risk would be less than what is reported above.

Operations

Carcinogenic exposures, the cancer risk from DPM emissions from the proposed project is analyzed as a net increase in cancer risk from the existing conditions. Therefore, in order to determine the net increase in cancer risk, the risk from the existing operations is subtracted from the risk associated with the proposed project. **Table 17**, *Unmitigated*

Maximum Operational Health Risk Impacts, summarize the carcinogenic and chronic risk for the maximum impacted sensitive receptors. The calculated cancer risk is estimated for outdoor exposure and assumes that sensitive receptors (residential uses) would not have any mitigation such as mechanical filtration and that residential uses would have continuously open windows. As the maximum risk (0.88 in one million) would be less than the risk threshold of 10.0 in one million, impacts would be less than significant without mitigation. The maximum exposed receptor is located in the residential uses directly to the north of project site and south of West Billings Street.

TABLE 17
UNMITIGATED MAXIMUM OPERATIONAL HEALTH RISK IMPACTS

Receptor Type	Max Cancer Risk	Receptor #	Cancer Risk (Receptor 62)	Cancer Risk (Receptor 15)	Non-Cancer Risk
Project	1.52	62	1.52	0.97	0.00056
Existing	0.79	15	0.65	0.79	0.00033
Net[a]	**—**	**—**	***0.88***	***0.17***	***0.00023***
SCAQMD Significance Thresholds			10	10	1
Exceeds Thresholds?			No	No	No

NOTE:
[a] Net emissions are project emissions minus existing emissions.
SOURCE: ESA, 2021.

Potential non-cancer effects of chronic (i.e., long term) DPM exposures were evaluated using the Hazard Index approach as described in the OEHHA Guidance. As shown in **Table 8**, the maximum net health hazard index associated with operational activities is 0.0002 which is associated with those sensitive receptors located along South Avalon Boulevard between East Walnut Street and the 91 Freeway. Sensitive receptors located further away would experience lower impacts. The project does not exceed the hazard index threshold of 1 and, therefore, the project's chronic risk impact would be less than significant.

Combined

Carcinogenic exposures, the cancer risk from DPM emissions from the proposed project is analyzed as a net increase in cancer risk from the existing conditions. Therefore, in order to determine the net increase in cancer risk, the risk from the existing operations is subtracted from the risk associated with the proposed project. **Table 18**, *Unmitigated Maximum Combined Health Risk Impacts*, summarize the carcinogenic and chronic risk for the maximum impacted sensitive receptors associated with the combined construction and operational activities. The calculated cancer risk is estimated for outdoor exposure and assumes that sensitive receptors (residential uses) would not have any mitigation such as mechanical filtration and that residential uses would have continuously open windows. As the maximum risk (8.08 in one million) would be less than the risk threshold of 10.0 in one million, impacts would be less than significant without

mitigation. The maximum exposed receptor is located in the residential uses directly to the north of project site and south of West Billings Street.

TABLE 18
UNMITIGATED MAXIMUM COMBINED HEALTH RISK IMPACTS

Receptor Type	Max Cancer Risk	Receptor No.	Cancer Risk (Receptor 62)	Cancer Risk (Receptor 15)	Non-cancer Risk
Construction	7.51	62	7.51	0.09	0.0579
Project Operations	1.07	62	1.07	0.67	0.0006
Existing Operations	0.54	15	0.50	0.54	0.0005
Net[a]	**—**	**—**	***8.08***	***0.39***	***0.0580***
SCAQMD Significance Thresholds			10	10	1
Exceeds Thresholds?			No	No	No

NOTE:
[a] Net emissions are construction plus Project operational emissions minus existing operational emissions.
SOURCE: ESA 2021

Potential non-cancer effects of chronic (i.e., long-term) DPM exposures were evaluated using the Hazard Index approach as described in the OEHHA Guidance. As shown in **Table 9**, maximum net health hazard index associated with operational activities is 0.058 which is associated with sensitive receptors located directly to the north of project site and south of West Billings Street. The project does not exceed the hazard index threshold of 1 and therefore the project 's chronic risk impact would be less than significant.

The results for carcinogenic and chronic risk were based on the unmitigated regional emissions. Implementation of Mitigation Measure MM-AQ-1 needed to reduce localized emissions would also reduce the DPM emissions from construction. Therefore, with implementation of MM-AQ-1, the combined carcinogenic and chronic risk would be less than what is reported in **Table 18**.

d) Potential sources that may emit odors during construction activities include construction equipment exhaust 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 single-family residences just north of the SCE utility easement, located approximately 160 feet to the north of the project along West Billings Street. 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.

Furthermore, as discussed in Thresholds b and c, above, construction and operational emissions would not exceed the SCAQMD regional significance thresholds for attainment, maintenance, or unclassifiable criteria air pollutants (i.e., CO and SO_2).

Therefore, impacts related to other emissions, including those that would lead to odors adversely affecting a substantial number of people, would be less than significant.

IV. Biological Resources

Issues (and Supporting Information Sources)	*Potentially Significant Impact*	*Less than Significant with Mitigation Incorporated*	*Less-than-Significant Impact*	*No Impact*
IV. BIOLOGICAL RESOURCES—Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☐	☒
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☐	☒
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒

Discussion

a) The project site is located in an urbanized area of the City of Carson and is currently developed with eight warehouses that served as a refrigerated food production plant for General Mills Inc., associated office/administrative facilities, loading docks, and surface parking. As part of the proposed project, the 37 existing trees would be removed and replaced with 62 new trees, in addition to other ornamental landscaping improvements. None of these trees are native or protected as defined by CMC section 3901. However, these trees have the potential to provide suitable nesting habitat for migratory birds and raptors protected under the Federal Migratory Bird Treaty Act (MBTA) and the California Fish and Game Code. The MBTA and California Fish and Game Code prohibit the take or destruction of migratory birds/raptors, their nests, and/or eggs. Impacts on nesting birds protected by the MBTA and similar provisions of the Fish and Game Code could occur if work is conducted during the breeding season (February 1 through August 15). However, the proposed project would adhere to all existing laws and regulations, including compliance with the MBTA, which will minimize any potential impacts to migratory birds or raptors as a result of tree removal. The project site does not contain suitable habitat for 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 Project and there is a low

probability of these species occurring on-site. Therefore, no impacts to candidate, sensitive, or special status species would occur and no mitigation measures are required.

b) As discussed in the response to Threshold a, the project site and surrounding area are located in an urbanized and industrial setting, there are no drainage channels to the nearby Los Angeles river, it does not contain riparian habitat, and three 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) As discussed above, in the response to Threshold a, the project site is located in an urbanized area and is developed with warehouse facilities, 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 Clean Water Act section 404. Thus, because the project site does not contain any wetland features no impact would occur.

d) The project site is located in an urbanized area of the City of Carson and is currently developed with eight warehouses that served as a refrigerated food production plant for General Mills Inc., associated office/administrative facilities, loading docks, and surface parking. As discussed above under Threshold a, as part of the proposed project, the 37 existing trees on the project site would be removed and replaced with 62 new trees, in addition to other ornamental landscaping improvements. None of these trees are native or protected as defined by CMC section 3901. However, these trees have the potential to provide suitable nesting habitat for migratory birds and raptors protected under the Federal Migratory Bird Treaty Act (MBTA) and the California Fish and Game Code. The MBTA and California Fish and Game Code prohibit the take or destruction of migratory birds/raptors, their nests, and/or eggs. Impacts on nesting birds protected by the MBTA and similar provisions of the Fish and Game Code could occur if work is conducted during the breeding season (February 1 through August 15). However, the proposed project will adhere to all existing laws and regulations, including compliance with the MBTA, which will minimize any potential impacts to migratory birds or raptors as a result of tree removal.

In addition, due to the urbanized nature of the project site and surrounding area, the lack of a major water body, and the lack of natural open space area on the project site, the site does not otherwise 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) As discussed above, the project site is located in an urbanized area of the City of Carson and is currently developed with eight warehouses that served as a refrigerated food

production plant for General Mills Inc., 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. Furthermore, the removal of the 37 non-protected and non-native existing onsite trees would occur in compliance with all existing laws and regulations, including the MBTA. Thus, the proposed project would not interfere with local biological preservation policies or ordinances and no impact would occur.

f) As discussed above, the project site is located in an urbanized area of the City of Carson and is currently developed with eight warehouses that served as a refrigerated food production plant for General Mills Inc., 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.

V. Cultural Resources

Issues (and Supporting Information Sources)	*Potentially Significant Impact*	*Less than Significant with Mitigation Incorporated*	*Less-than-Significant Impact*	*No Impact*
V. CULTURAL RESOURCES—Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	☐	☐	☐	☒
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	☒	☐	☐
c) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☒	☐	☐

Discussion

The following analysis is based on the *1055 E Sandhill Avenue, Cultural Resources Assessment Report* (ESA 2021), located in Appendix B of this Draft IS/MND. This Study is confidential and not for public distribution.

a) A historical resource is defined in CEQA Guidelines section 15064.5(a)(3) 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. No historic-age architectural resources were identified within the project site; therefore, the project would have no direct impact on known historical or archaeological resources. No historic architectural resources meeting the Office of Historic Preservation's 45-year threshold were observed within the project site that could be impacted by the project. The records search revealed that one cultural resource has been previously recorded within the 0.5-mile radius of the project site. This is a historic resource and consist of a steel lattice transmission tower within the Southern California Edison right-of-way. The tower was built prior to 1969 and was found ineligible under the National Register of Historic Places. Therefore, no impact would occur.

b) CEQA Guidelines section 15064.5(a)(3)(D) 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.

A records search for the project was received from the South Central Coastal Information Center (SCCIC) on March 2, 2021. The records search included a review of all recorded

archaeological resources and previous studies within a 0.5-mile radius of the project site. The records search results indicate that five cultural resources studies have been conducted within a 0.5-mile radius of the project site. Approximately 75 percent of the 0.5-mile records search radius has been included in previous cultural resources studies. Of the 5 previous studies, one (LA-12715) previously included the project site. This study is a Cultural Resources Inventory of the City of Carson from 1977. Additionally, the records search revealed that one cultural historic resource has been previously recorded within the 0.5-mile radius of the project site. This is a steel lattice transmission tower within the Southern California Edison right-of-way. The tower was built prior to 1969 and was found ineligible under the National Register of Historic Places. No resources have been recorded within the project site.

Despite the negative results, it is possible that ground-disturbing activities could unearth buried or otherwise obscured resources, particularly since a portion of the project site is covered by vegetation and landscaping. It is recommended that an archaeological monitor be present during initial ground-disturbing activities, including grubbing and other methods of de-vegetation, in order to assess surface and subsurface conditions. Based on observations made by the archaeological monitor, monitoring activities may be modified or discontinued at the recommendation of the archaeologist. Additionally, it is recommended that protocols for work stoppage in the event that archaeological resources or human remains are encountered during construction should be implemented.

Based on these results, Mitigation Measures MM-CULT-1 through MM-CULT-2 are identified to ensure that potentially significant impacts to archaeological resources are reduced to a less-than-significant level.

Mitigation Measure

MM-CULT-1. Prior to issuance of demolition permit, the Applicant shall retain a qualified Archaeologist who meets the Secretary of the Interior's Professional Qualifications Standards (Qualified Archaeologist) to oversee an archaeological monitor who shall be present during construction excavations such as demolition, clearing/grubbing, grading, trenching, or any other construction excavation activity associated with the project. The frequency of monitoring shall be based on the rate of excavation and grading activities, proximity to known archaeological resources, the materials being excavated (younger alluvium vs. older alluvium), and the depth of excavation, and if found, the abundance and type of archaeological resources encountered, as determined by the Qualified Archaeologist). Full-time field observation can be reduced to part-time inspections or ceased entirely if determined appropriate by the Qualified Archaeologist. Prior to commencement of excavation activities, an Archaeological and Cultural Resources Sensitivity Training shall be given for construction personnel. The training session, shall be carried out by the Qualified Archaeologist and shall focus on how to identify archaeological and cultural resources that may be encountered during earthmoving activities and the procedures to be followed in such an event.

In the event that historic or prehistoric archaeological resources (e.g., bottles, foundations, refuse dumps, Native American artifacts or features, etc.) are unearthed, ground-disturbing activities shall be halted or diverted away from the vicinity of the find so that the find can be evaluated. An appropriate buffer area shall be established by the Qualified Archaeologist around the find where construction activities shall not be allowed to continue. Work shall be allowed to continue outside of the buffer area. All archaeological resources unearthed by project construction activities shall be evaluated by the Qualified Archaeologist and a Gabrielino Tribe. If the resources are Native American in origin, the Gabrieleno Tribe shall consult with the City and Qualified Archaeologist regarding the treatment and curation of any prehistoric archaeological resources. If a resource is determined by the Qualified Archaeologist to constitute a "historical resource" pursuant to CEQA Guidelines section 15064.5(a) or a "unique archaeological resource" pursuant to Public Resources Code section 21083.2(g), the Qualified Archaeologist shall coordinate with the Applicant and the City to develop a formal treatment plan that would serve to reduce impacts to the resources. The treatment plan established for the resources shall be in accordance with CEQA Guidelines section 15064.5(f) for historical resources and Public Resources Code section 21083.2(b) for unique archaeological resources. The treatment plan shall incorporate the Gabrielino Tribe's treatment and curation recommendations. Preservation in place (i.e., avoidance) is the preferred manner of treatment. If preservation in place is not feasible, treatment may include implementation of archaeological data recovery excavations to remove the resource along with subsequent laboratory processing and analysis. The treatment plan shall include measures regarding the curation of the recovered resources that may include curation at a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County or the Fowler Museum, if such an institution agrees to accept the material and/or the Gabrielino Tribe. If no institution or the Gabrielino Tribe accepts the resources, they may be donated to a local school or historical society in the area (such as the Culver City Historical Society) for educational purposes.

Prior to the release of the grading bond, the Qualified Archaeologist shall prepare a final report and appropriate California Department of Parks and Recreation Site Forms at the conclusion of archaeological monitoring. The report shall include a description of resources unearthed, if any, treatment of the resources, results of the artifact processing, analysis, and research, and evaluation of the resources with respect to the California Register of Historical Resources and CEQA. The report and the Site Forms shall be submitted by the Applicant to the City, the South Central Coastal Information Center, and representatives of other appropriate or concerned agencies to signify the satisfactory completion of the project and required mitigation measures.

c) The California Native American Heritage Commission (NAHC) was contacted on March 3, 2021, to request a search of the SLF. The NAHC responded to the request in a letter dated March 12, 2021, with the results of the SLF search conducted by the NAHC,

which indicated a negative search result. The NAHC provided a list of tribes who could be contacted for information regarding known and recorded sites.

Archival research did not reveal any evidence that human remains could be found at the project site or in the area adjacent to the project site. Even so, construction of the project could potentially disturb previously unknown human remains. Implementation of Mitigation Measure CULT-2 would ensure impacts related to the discovery of human remains would be reduced to a less than significant level.

Mitigation Measure

MM-CULT-2. If human remains are encountered unexpectedly during implementation of the project, State Health and Safety Code section 7050.5 requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to PRC section 5097.98. If the remains are determined to be of Native American descent, the coroner has 24 hours to notify the Native American Heritage Commission (NAHC). The NAHC shall then identify the person(s) thought to be the Most Likely Descendent (MLD). The MLD may, with the permission of the land owner, or his or her authorized representative, inspect the site of the discovery of the Native American remains and may recommend to the owner or the person responsible for the excavation work means for treating or disposing, with appropriate dignity, the human remains and any associated grave goods. The MLD shall complete their inspection and make their recommendation within 48 hours of being granted access by the land owner to inspect the discovery. The recommendation may include the scientific removal and nondestructive analysis of human remains and items associated with Native American burials. Upon the discovery of the Native American remains, the landowner shall ensure that the immediate vicinity, according to generally accepted cultural or archaeological standards or practices, where the Native American human remains are located, is not damaged or disturbed by further development activity until the landowner has discussed and conferred, as prescribed in this mitigation measure, with the MLD regarding their recommendations, if applicable, taking into account the possibility of multiple human remains. The landowner shall discuss and confer with the descendants all reasonable options regarding the descendants' preferences for treatment.

If the NAHC is unable to identify a MLD, or the MLD identified fails to make a recommendation, or the landowner rejects the recommendation of the MLD and the mediation provided for in PRC section 5097.94, subdivision (k), if invoked, fails to provide measures acceptable to the landowner, the landowner or his or her authorized representative shall inter the human remains and items associated with Native American human remains with appropriate dignity on the facility property in a location not subject to further and future subsurface disturbance.

VI. Energy

Issues (and Supporting Information Sources)	*Potentially Significant Impact*	*Less than Significant with Mitigation Incorporated*	*Less-than-Significant Impact*	*No Impact*
VI. ENERGY—Would the project:				
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☒	☐
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☒	☐

Discussion

a) The proposed project would consume energy during construction activities primarily from on- and off-road vehicle fuel consumption in the form of diesel, gasoline, and electricity from water conveyance for dust control. Project operation would consume energy from industrial activities including operation of forklifts, energy use from general building operations, including building heating, ventilation and air conditioning (HVAC) systems and lighting, and from mobile sources. The analysis below includes the proposed project's energy requirements and energy use efficiencies by energy type for each stage of the project (construction and operations).

Construction

Construction of the project would result in energy demand primarily from off-road equipment and on-road vehicle fuel consumption (diesel and gasoline) and secondarily from electricity for conveying water used for dust suppression and for a temporary on-site construction office/trailer. The analysis below includes the proposed 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 California Air Resources Board (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, water trucks for dust control, and fuel used for employee commute trips. The estimated fuel usage for on-road vehicles is based on the number of trucks and employee commute trips that would occur during construction activities and per mile fuel consumption factors from the CARB on-road vehicle emissions factor (EMFAC) model, which was used in the project's air quality analysis. Electricity used for a portable construction office was calculated using energy intensity factors from CalEEMod and electricity from water conveyance for dust control was calculated using assumptions for gallons used per acre per day and CalEEMod water conveyance intensity factors applied to calculate total construction electricity consumption. Construction activities typically do not involve the consumption of natural gas. **Table 19**, *Summary of Energy Consumption*

during Project Construction, summarizes the proposed project's total and annual fuel and electricity consumption from construction activities.

TABLE 19
SUMMARY OF ENERGY CONSUMPTION DURING PROJECT CONSTRUCTION

Fuel Type	Quantity
Gasoline	**gallons**
On-Road Construction Equipment	10,804
Off-Road Construction Equipment	—
Total Gasoline (over 12.5 months)	***10,804***
Diesel	**gallons**
On-Road Construction Equipment	6,928
Off-Road Construction Equipment	35,820
Total Diesel (over 12.5 months)	***42,748***
Electricity	**MWh**
Construction Office	13.0
Water Conveyance for Dust Control	3.8
Total Electricity (over 12.5 months)	***16.8***
Annualized Gasoline Use (gal)	**10,405**
Annualized Diesel Use (gal)	**41,169**
Annualized Electricity (MWh)	**16.6**

NOTES:
gal = gallons; MWh = megawatt-hours
SOURCE: ESA 2021

As shown in **Table 19**, annual average construction electricity usage would be approximately 16.8 megawatt-hours (MWh) and would be within the supply and infrastructure capabilities of SCE, the electricity provider for the project site, which had a net energy load of 84,654 gigawatt-hours (GWh) in 2019 (SCE 2019).[5] The electricity demand at any given time would vary throughout the construction period based on the construction activities being performed, and would cease upon completion of construction. Electricity use from construction would be short-term, limited to working hours, used for necessary construction-related activities, and represent a small fraction of the Project's net annual operational electricity (the Project's annualized construction electricity would be approximately 1 percent of the Project's annual operational electricity). When not in use, electric equipment would be powered off so as to avoid unnecessary energy consumption. Furthermore, the electricity used for off-road light construction equipment would have the co-benefit of reducing construction-related air pollutant and GHG emissions from more traditional construction-related energy in the form of diesel fuel. Therefore, impacts from construction electrical demand would be less

5 The most recent year that SCE data was available.

than significant and would not result in the wasteful, inefficient, and unnecessary consumption of energy.

The energy use summary provided above in **Table 19** represents the amount of energy that could potentially be consumed during project construction based on a conservative set of assumptions, provided in Appendix C. As shown, on- and off-road vehicles would consume an estimated annual average of 10,405 gallons of gasoline and approximately 41,169 gallons of diesel fuel throughout the project's construction. For comparison purposes, the fuel usage during project construction would represent approximately 0.0003 percent of the 2019 annual on-road gasoline-related energy consumption and 0.007 percent of the 2019 annual diesel fuel-related energy consumption in Los Angeles County. Detailed calculations are shown in Appendix C.

Operations

During operation of the proposed project, energy would be consumed for multiple purposes, including, but not limited to HVAC equipment, lighting and the use of electronics, electric forklifts, and electric vehicle charging. Energy would also be consumed during project operations related to water usage, solid waste disposal, and vehicle trips. **Table 20**, *Project Operational Energy Usage*, summarizes the existing site's and the proposed project's operational energy consumption.

The proposed project would increase demand for electricity including what is needed to support building operations. As shown in **Table 20**, the proposed project would result in a net annual consumption of electricity of approximately 1,523 MWh per year, which would represent approximately 0.002 percent of SCE's total sales of 84,654 GWh in 2019 (SCE 2019).

The proposed project has been evaluated for consistency with the Energy Efficiency Climate Action Plan (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 proposed project would install lighting and a ventilation system that conforms to the CALGreen Code and 2019 Title 24 Standards and would be consistent with energy reduction strategies in the City's EECAP.

The proposed project would increase the demand for natural gas resources. As shown in **Table 20**, the project's estimated net operational natural gas demand is 0.27 million cubic feet, which represents 0.00003 percent of SoCalGas' projected supply of 896,805 million cubic feet in 2022 (California Gas and Electric Utilities 2020). As would be the case with electricity, the proposed 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 proposed project would minimize energy demand. Therefore, with the incorporation of these features, operation of the proposed project would not result in the wasteful, inefficient, and unnecessary consumption of natural gas, and impacts would be less than significant.

TABLE 20
PROJECT OPERATIONAL ENERGY USAGE

Energy Type[a]	Annual Quantity[b,c]
Electricity	
Existing Site	(1,215.2 MWh)
Proposed Project:	
Building Energy	1,405.7 MWh
Water Conveyance	391.1 MWh
EV Charging	11.2 MWh
Electric Forklifts	930.2 MWh
Project Subtotal	2,738.2 MWh
Total Net Electricity	***1,523.0 MWh***
Natural Gas	
Existing Site	(1.91 million cf)
Proposed Project:	
Building Energy	2.19 million cf
Total Net Natural Gas	***0.27 million cf***
Transportation	
Existing Site:	
Gasoline	(71,255 gallons)
Diesel	(68,042 gallons)
Proposed Project:	
Gasoline	77,577 gallons
Diesel	74,845 gallons
Total Net Transportation – Gasoline	***6,321 gallons***
Total Net Transportation – Diesel	***6,803 gallons***

NOTES:

MWh = megawatt-hours; million cf = million cubic feet

Detailed calculations are provided in Appendix C of this ISMND

[a] Project electricity and natural gas estimates assume compliance with applicable 2019 Title 24 and CALGreen requirements

[b] Totals may not add up due to rounding of decimals.

[c] Negative values are denoted using parentheses.

SOURCE: ESA, 2021.

The proposed project would increase demand for transportation fuels relative to existing site conditions for gasoline and diesel. During daily operations, the proposed project would have a maximum of 498 passenger car trips and 130 truck trips. The proposed project's net annual gasoline consumption would be approximately 6,321 gallons which represents 0.0002 percent of Los Angeles County's 2019 consumption of 3.6 billion gallons (CEC 2019). The proposed project's net annual diesel consumption would be approximately 6,803 gallons which represents 0.0012 percent of Los Angeles County's 2019 consumption of 584.7 million gallons (CEC 2019).

b) The Project would utilize construction contractors who demonstrate compliance with applicable regulations. Construction equipment would comply with federal, State, and regional requirements where applicable. With respect to truck fleet operators, the USEPA and NHSTA have adopted fuel efficiency standards for medium- and heavy-duty trucks. The Phase 1 heavy-duty truck standards apply to combination tractors, heavy-duty pickup trucks and vans, and vocational vehicles for model years 2014 through 2018 and result in a reduction in fuel consumption from 6 to 23 percent over the 2010 baseline, depending on the vehicle type.[6] USEPA and NHTSA also adopted the Phase 2 heavy-duty truck standards, which cover model years 2021 through 2027 and require the phase-in of a 5 to 25 percent reduction in fuel consumption over the 2017 baseline depending on the compliance year and vehicle type.[7] The energy modeling for trucks does not take into account specific fuel reductions from these regulations, since they would apply to fleets as they incorporate newer trucks meeting the regulatory standards; however, these regulations would have an overall beneficial effect on reducing fuel consumption from trucks over time as older trucks are replaced with newer models that meet the standards.

In addition, construction equipment and trucks are required to comply with CARB regulations regarding heavy-duty truck idling limits of five minutes at a location and the phase-in of off-road emission standards that result in an increase in energy savings in the form of reduced fuel consumption from more fuel-efficient engines. Although these regulations are intended to reduce criteria pollutant emissions, compliance with the anti-idling and emissions regulations would also result in the efficient use of construction-related energy.

The State and the City have implemented energy policies relevant to the proposed project. The California Renewables Portfolio Standard (RPS) was established in 2002 and required retail sellers of electricity, including investor-owned utilities and community choice aggregators (CCAs), to provide at least 20 percent of their supply from renewable sources by 2013. Senate Bill (SB) 350 (chapter 547, Statues of 2015) is the most recent update to the state's RPS requirements. The RPS requires publicly owned utilities and retail sellers of electricity in California to procure 33 percent of their electricity sales from eligible renewable sources by 2020 and 50 percent by the end of 2030. The project would comply with the applicable provisions of the 2019 Title 24 standards and the CALGreen Code in effect at the time of building permit issuance. As of February 2019, the City receives electricity from Clean Power Alliance (CPA) and is enrolled in their 50 percent renewable electricity option. Customers have the choice to opt for a lower renewable energy mix (36 percent), opt for a higher renewable energy mix (100 percent), or opt out and receive electricity from SCE (CPA 2021). Therefore, the electricity provided to the City meets or exceeds RPS requirements depending on what rate option is chosen by individual customers.

6 USEPA, Fact Sheet: EPA and NHTSA Adopt First-Ever Program to Reduce Greenhouse Gas Emissions and Improve Fuel Efficiency of Medium- and Heavy-Duty Vehicles, August 2011.

7 USEPA, Federal Register/Vol. 81, No. 206/Tuesday, Greenhouse Gas Emissions and Fuel Efficiency Standards for Medium- and Heavy-Duty Engines and Vehicles—Phase 2, October 25, 2016.

As discussed above, the proposed project would comply with the applicable provisions of 2019 Title 24 Standards, City of Carson's EECAP, and the CALGreen Code in effect at the time of building occupancy. As such, the proposed project would minimize energy demand. Further, as discussed in Section III, *Air Quality*, of this Draft IS/MND, SCAG predicted Carson's employment growth between 2012 and 2040 to be approximately 11,200 new jobs (SCAG 2020). The estimated 194 new employees generated by the proposed project would be within SCAG's employment growth assumptions for Carson. As discussed in Section XVII, *Transportation*, of this Draft IS/MND, the project would not have a significant impact on transportation or traffic in the project vicinity. Additionally, the proposed project is an infill project located in a larger industrial park with industrial, manufacturing, and commercials uses surrounding it to the west, east, and south and, therefore, would provide additional jobs near existing job centers. The project would be a similar land use as the existing site and would result in only slightly more trips to and from the site. Thus, since the proposed project is consistent with SCAG growth projections and would comply with State and local regulations to reduce energy consumption, the project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency and impacts would be less than significant.

VII. Geology and Soils

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

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 within the Avalon-Compton fault zone, which is part of the larger Newport Inglewood fault zone (City of Carson 2004). The Avalon-Compton fault zone is located approximately 175 feet east of the project site; however, as stated in the City's General Plan, surface faulting is not considered a significant potential hazard for properties located within the City.

Furthermore, as with any new project development in the State of California, the project's 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 2019 California Building Code (CBC). The 2019 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. Because most of all of southern California is considered to be within an active fault zone, all new structures would be required to comply with the most recent CBC. With adherence to the latest CBC, the latest California seismic design requirements would be included in the project's

building design and inspected by the City during construction; therefore, impacts would be less than significant.

a.ii) 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 construction 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. Therefore, a less-than-significant impact associated with strong seismic ground shaking would occur.

a.iii) 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 California Geological Survey (CGS), the site is not located in an area where historic occurrences of liquefaction or local geological geotechnical or ground water conditions indicate a potential for permanent ground displacements (CGS 2021). Furthermore, as discussed above, the proposed project would be 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, including liquefaction. As such, the proposed project would not expose additional people or structures to potential substantial adverse effects associated with liquefaction. Therefore, a less than significant impact would occur.

a.iv) 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. Furthermore, the proposed project would be constructed in accordance with the CBC, and thereby the City's Building Code. As such, the project would result in less than significant impacts regarding the potential for landslides.

b) The project site is currently developed with existing industrial buildings, 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 be less than significant.

c) The project site currently contains existing buildings 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. As discussed previously, the project site is relatively flat and is not located within an area susceptible to liquefaction or landslides. Additionally, the proposed project is not identified to be located within areas prone to lateral spreading. Nevertheless, the proposed project would be constructed in accordance with the CBC, and thereby the City's Building Code. Conformance with standard engineering practices and design criteria would ensure that the project does not exacerbate existing conditions and that impacts are less than significant.

d) 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. Such soils can expose overlying buildings to differential settlement and other structural damage. According to the Natural Resources Conservation Service (NRCS) Web Soil Survey, the site is primarily composed of Urban Land Thumus Windfetch Complex soils, Urban land Typic-Xerothents, terraced-Windfetch soils, and Urban land Windfetch-Centinela complex, which have moderate to high infiltration rates and low shrink-swell or expansion characteristics (NRCS 2020). Furthermore, the proposed project would be constructed in accordance with the CBC, and thereby the City's Building Code. Conformance with standard engineering practices and design criteria, as well as with the CBC, and thereby the City's Building Code, would reduce the potential for substantial risks to life or property as a result of expansive soils to a minimal level and the associated impacts would be less than significant.

e) The project site is located in an urbanized area 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) Geologic mapping shows that the entire surface of the Project is underlain by Pleistocene-age (2,580,000 to 11,700 years ago) older alluvium (Qoa). The Pleistocene-age alluvial deposits are fine-grained and composed of material weathering off of the Palos Verdes Hills, uplifting to the south. West of the Project are exposures of younger, Holocene-age alluvium as broad uplifted regions (Qae) or filling in channels and floodplains (Qa).

A database search from the Natural History Museum of Los Angeles County (LACM) for records of fossil localities in and around the Project site (Bell 2021) yielded no locations in the project area, but fossil sites in similar units elsewhere in the Los Angeles Basin. These fossil localities include both invertebrate and vertebrate fossils, indicative of Ice Age faunal communities.

The Pleistocene-age older alluvium is of appropriate age and has produced a number of fossil specimens throughout the Los Angeles Basin and, therefore, has high paleontological sensitivity. The Holocene-age alluvial units, Qa and Qae, are too young to host significant fossil deposits.

Ground-disturbing activities associated with the Project that extend to depths 5 feet below ground surface may impact paleontological resources of the older alluvium. Therefore, it is recommended that the following mitigation measures be applied to reduce impacts including: the retention of a qualified paleontologist, paleontological resources sensitivity training, paleontological resources monitoring, and inadvertent discovery protocols. Project ground disturbing activities have the potential to disturb sediments at various depths, depending on the activity. Surface scraping, stockpiling, and grading are considered surficial and will not impact fossil resources. Deep excavations, extending 5 feet below grade or more, have the potential to encounter significant fossils in the Quaternary older alluvium.

Given the potential of the Qoa alluvial unit to contain paleontological resources per the SVP (2010) procedural guidelines, it is recommended that the following Mitigation Measure GEO-1 be applied to reduce impacts to paleontological resources to less than significant.

Mitigation Measure

MM-GEO-1. Prior to the start of construction activities, the Applicant shall retain a Qualified Paleontologist that meets the standards of the Society for Vertebrate Paleontology (2010) to carry out all mitigation measures related to paleontological resources. The Qualified Paleontologists will thoroughly review the geotechnical specifications of the project to best understand the extent and depths of ground disturbance.

Prior to start of any ground disturbing activities, the Qualified Paleontologist shall conduct pre-construction worker paleontological resources sensitivity training, either in person or via a training module. The training shall include information on what types of paleontological resources could be encountered during excavations, what to do in case an unanticipated discovery is made by a worker, and laws protecting paleontological resources. All construction personnel shall be informed of the possibility of encountering fossils and instructed to immediately inform the construction foreman or supervisor if any bones or other potential fossils are unexpectedly unearthed in an area where a paleontological monitor is not present. The Applicant shall ensure that construction personnel are

made available for and attend the training and retain documentation demonstrating attendance.

The Qualified Paleontologist shall supervise a paleontological monitor meeting the Society for Vertebrate Paleontology standards (2010) who shall be present during all excavations exceeding 5 feet that encounter the older, Pleistocene alluvium. Boreholes, auguring, and similar activity is not necessary to monitor; however, any geological logs from the activity should be provided to the Qualified Paleontologist. Monitoring shall consist of visually inspecting fresh exposures of rock for larger fossil remains and, where appropriate, collecting wet or dry screened standard sediment samples (up to 4.0 cubic yards) of promising horizons for smaller fossil remains (SVP 2010). Depending on the conditions encountered, full-time monitoring can be reduced to part-time inspections or ceased entirely if determined adequate by the Qualified Paleontologist. The Qualified Paleontologist or his/her representative shall spot check the excavation on an intermittent basis and recommend whether the depth of required monitoring should be revised based on his/her observations. Monitoring activities shall be documented in a Paleontological Resources Monitoring Report to be prepared by the Qualified Paleontologist at the completion of construction and shall be provided to the Applicant within six (6) months of Project completion. If fossil resources are identified during monitoring, the report will also be filed with the Natural History Museum of Los Angeles County.

If a paleontological resource is discovered during construction, the paleontological monitor shall be empowered to temporarily divert or redirect grading and excavation activities in the area of the exposed resource to facilitate evaluation of the discovery. An appropriate buffer area of 25-foot radius shall be established by the Qualified Paleontologist around the find where construction activities shall not be allowed to continue. Work shall be allowed to continue outside of the buffer area. At the Qualified Paleontologist's discretion and to reduce any construction delay, the excavation contractor shall assist in removing rock samples for initial processing and evaluation of the find. All significant fossils shall be collected by the paleontological monitor and/or the Qualified Paleontologist. Collected fossils shall be prepared to the point of identification and catalogued before they are submitted to their final repository. Any fossils collected shall be curated at a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County, if such an institution agrees to accept the fossils. If no institution accepts the fossil collection, they shall be donated to a local school in the area for educational purposes. Accompanying notes, maps, photographs, and a technical report shall also be filed at the repository and/or school.

VIII. Greenhouse Gas Emissions

Issues (and Supporting Information Sources)	*Potentially Significant Impact*	*Less than Significant with Mitigation Incorporated*	*Less-than-Significant Impact*	*No Impact*
VIII. GREENHOUSE GAS EMISSIONS—Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b) Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

Discussion

a) Gases that trap heat in the atmosphere are called greenhouse gases (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 (CO_2), methane (CH_4), nitrous oxide (N_2O), sulfur hexafluoride (SF_6), perfluorocarbons (PFCs), and hydrofluorocarbons (HFCs). Because different GHGs have different global warming potentials (GWPs) and CO_2 is the most common reference gas for climate change, GHG emissions are often quantified and reported as CO_2 equivalents (CO_2e). For example, CH_4 has a GWP of 25 (over a 100-year period); therefore, one metric ton (MT) of CH_4 is equivalent to 25 MT of CO_2 equivalents ($MTCO_2e$). 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 CO_2e emissions can be tabulated in metric tons (MT) per year. Large emission sources are reported in million metric tons (MMT) of CO_2e.[8]

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):

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;

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

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 425.3 $MMTCO_2e$ in 2018.[9] Combustion of fossil fuel in the transportation sector was the single largest source of California's GHG emissions in 2018, accounting for approximately 40 percent of total GHG emissions in the State. This sector was followed by the industrial sector (21 percent) and the electric power sector (including both in- State and out-of- State sources) (15 percent) (CARB 2021).

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 $MTCO_2e$ 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 $MTCO_2e$ 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 $MTCO_2e$ 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

[9] 2018 is the most recent inventory available for GHG emissions in California.

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 [MMTCO$_2$e 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 MTCO$_2$e 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 and operations mobile emissions were estimated outside of CalEEMod to account for EMFAC2017 because EMFAC2017 has not yet been incorporated in the current version of CalEEMod (see Appendix D of this IS/MND for additional details).

Construction Emissions

Construction activities associated with the proposed project would result in emissions of CO_2 and, to a lesser extent, CH_4 and N_2O. Construction-period GHG emissions were

quantified based on the same construction schedule, activities, and equipment list as described above in Section III, *Air Quality*, Threshold 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 proposed project's annual operational-phase GHG emissions.

Operational Emissions

GHG Emissions

Operational activities associated with the project would result in emissions of CO_2 and, to a lesser extent CH_4 and N_2O. Operational sources of GHG emissions would include mobiles sources from vehicles traveling to and from the site, and indirect GHG emissions from export of electricity.

A maximum of 130 truck trips and 498 passenger vehicle trips per day is expected (Translutions Inc. 2021). GHG emissions from mobile sources are based on the vehicle emission factors from EMFAC2017 and the default trip length and trip distribution values for the project land uses in CalEEMod, which are Air District-wide average trip distance and trip distribution values. Daily trip generation from the project's Trip Generation Analysis, provided in Appendix F, were used to estimate the total VMT for existing trips and proposed project trips (Translutions Inc. 2021).

Emissions of GHGs also resulted from electricity demand to power the on-site equipment (including electric powered forklifts to move products within the facility) and lighting for the project site. Electricity-related GHG emissions are based on the maximum electricity demand for project equipment, assuming maximum operating loads and equipment running hours, and CO_2 intensity factors for SCE, the electricity provider for the project site.

The proposed project would result in a net change in project site emissions of GHGs. Existing operational GHG emissions would be related to the existing industrial use at the project site. For the purpose of this analysis, the operational GHG emissions were calculated for the existing building, which represents the project site's baseline GHG emissions. The emissions were calculated using historical energy and utilities data. For existing mobile sources, a maximum of 112 truck trips and 432 passenger vehicle trips per day occurred for the existing industrial use (Translutions Inc. 2021).

Emissions Summary

The project's annual GHG emissions are shown in **Table 21**, *Annual Project Greenhouse Gas Emissions*. 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 $MTCO_2e$. The project would result in a less-than-significant impact with respect to GHG emissions. GHG emission calculations are provided in Appendix D.

TABLE 21
ANNUAL PROJECT GREENHOUSE GAS EMISSIONS

Emissions Sources	CO_2e (Metric Tons per Year)[a]
Area	<1
Electricity	390
Natural Gas	121
Mobile (Employee)	693
Mobile (Heavy-Duty)	875
Waste	39
Water	104
Construction[b]	17
Project Total	***2,240***
Existing	1,875
Project Net Total GHG Emissions	***365***
SCAQMD GHG Significance Threshold	10,000
Exceeds Threshold?	No

NOTES:
[a] Totals may not add up exactly due to rounding in the modeling calculations. See Appendix D for details.
[b] Construction emissions are amortized over 30 years.
SOURCE: ESA 2018

b) The City of Carson General Plan does not identify specific GHG or climate change policies or goals, the City's EECAP, developed by the South Bay Cities Council of Governments, aims to implement energy efficiency and GHG reduction efforts (City of 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 (City of 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 (City of Carson 2017). Consistent with the strategies identified in the EECAP, the project would install lighting and a ventilation system that conforms to the California Green Building Code. 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). In April 2017, the LCFS was brought before the Court of Appeal challenging the analysis of potential nitrogen dioxide impacts from biodiesel fuels. The Court directed CARB to conduct an analysis of nitrogen dioxide impacts from biodiesel fuels and froze the carbon intensity targets for diesel and biodiesel fuel provisions at 2017 levels until CARB has completed this analysis. On March 6, 2018, CARB issued its Draft Supplemental Disclosure Discussion of Oxides of Nitrogen Potentially Caused by the Low Carbon Fuel Standard Regulation (CARB 2021a). CARB posted modifications to the amendments on August 13, 2018, with a public comment period through August 30, 2018. Final approval of regulatory changes from CARB's analysis of nitrogen dioxide impacts from biodiesel fuels was made on January 4, 2019 (CARB 2021a). the LCFS was amended in September 2018 to require a reduction of at least 7.5 percent in the carbon intensity (CI) of California's transportation fuels by 2020 and a 20 percent reduction in CI from a 2010 baseline by 2030 (CARB 2021b). The 2017 Climate Change Scoping Plan also calls for increasing the mandatory reduction in carbon intensity of transportation fuels from 10 percent to 18 percent by 2030.

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.

IX. Hazards and Hazardous Materials

Issues (and Supporting Information Sources)	*Potentially Significant Impact*	*Less than Significant with Mitigation Incorporated*	*Less-than-Significant Impact*	*No Impact*
IX. HAZARDS AND HAZARDOUS MATERIALS—Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☒	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☒	☐
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☒	☐
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☐	☒
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	☐	☐	☐	☒

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 is occupied by an existing warehouse and loading dock. Project construction activities would involve minimal use and transport of hazardous materials. Construction would involve 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. As required by these regulatory agencies, construction contractors would be required to 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. Therefore, all construction-related hazardous 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 the transport, use, or disposal of hazardous materials during construction are less than significant.

Operation

If operation of the project involves the use of hazardous materials or substances at a quantity exceeding levels established by the California Health and Safety Code, preparation of a Hazardous Materials Business Plan would be required (California Health and Safety Code division 20, chapter 6.95, article 1, section 25507). 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 Los Angeles County Fire Department (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.

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 would be secured and the damaged container would be picked up either by the chemical's owner for repackaging or by a certified third-party hazardous waste hauler to be disposed of at a designated hazardous waste disposal facility.

The storage, use, transport, and disposal of hazardous materials are regulated by applicable federal, State, and local regulations. Compliance with CMC Ordinance No. 17-1637, section 15.140(E)(5)[10] 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

[10] 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.

project related to use, transport, storage, or disposal of hazardous materials would be less than significant.

b) ***Construction***

Construction of the project would require minimal use of hazardous materials typical to construction, including gasoline, motor oils, paints, solvents, and other miscellaneous materials (e.g., engine oil, etc.). All potentially hazardous materials would be used and stored in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations. The construction phase would involve the use of heavy equipment, which require 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 upset or accidental release of hazardous materials would be less than significant.

Operation

As discussed above, 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 would be secured and the damaged container would be picked up either by the chemical's owner for repackaging or by a certified third-party hazardous waste hauler to be disposed of at a designated hazardous waste disposal facility.

The storage, use, transport and disposal of hazardous materials are regulated by applicable federal, State, and local regulations. Compliance with CMC Ordinance No. 17-1637, section 15.140(E)(5)[11] 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.

c) The nearest school to the project site is the Caldwell Street Elementary School, located approximately 0.22 miles or 1,162 feet northeast. Although the nearest school to the

[11] 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.

proposed project is located within 0.25 miles of the project, it is anticipated that a large volume of construction and operational materials use would occur south of West Greenleaf Boulevard, and the majority of haul vehicles would access the site via Gardena Freeway (SR-91) and would not be within a hazardous distance to sensitive uses at this 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. 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 California Department of Toxic Substances Control (DTSC) EnviroStor and State Water Resources Control Board (SWRCB) GeoTracker databases did not indicate any open cleanup sites or hazardous waste facilities within the project site (DTSC 2021; SWRCB 2021). However, GeoTracker listed two cleanup sites associated with uses on two properties within 1,000 feet of the project site: Pie Nationwide Industries, a Leaking Underground Storage Tank (LUST) located at 1101 Janis Street, and Prudential a LUST located at 951 Sandhill Avenue South. Both sites have received case-closed certification, and no further cleanup activities are required. As the proposed project is not located on a cleanup site, and given that there are no active cleanup sites within 1,000 feet of the project site, impacts related to hazardous material sites would be less than significant.

e) The project site is approximately 0.9 miles southwest of the Compton/Woodley Airport and 4.9 miles southeast of the Hawthorne Municipal Airport. Based on the Los Angeles County Airport Land Use Plan, the project site is located outside of the Airport Influence Area for the Compton/Woodley Airport and the Hawthorne Municipal Airport (Los Angeles County Airport Land Use Commission 2004). 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) The City has prepared a Multi-Hazard Functional Plan (1996) for emergency response within the city (City of Carson 2004). The plan identifies emergency protocol, critical meeting areas, and emergency evacuation routes. The four major freeways (Interstate (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 0.5-mile intervals would serve as potential evacuation routes during a disaster. Potential evacuation routes that occur near the project site include: Artesia Boulevard, Avalon Boulevard, Central Avenue, and Wilmington Street. Given that the project is not located along one of these routes, operations are not likely to 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) The project site is located in an 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). Construction of the project would be in accordance with the 2019 CBC, 2019 California Fire Code (CFC), which include mandatory measures for fire prevention and emergency access. 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.

X. Hydrology and Water Quality

Issues (and Supporting Information Sources)	*Potentially Significant Impact*	*Less than Significant with Mitigation Incorporated*	*Less-than-Significant Impact*	*No Impact*
X. HYDROLOGY AND WATER QUALITY—Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of imperious surfaces, in a manner which would:				
i) result in substantial erosion or siltation on- or off-site;	☐	☐	☒	☐
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	☐	☐	☒	☐
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	☐	☐	☒	☐
iv) impede or redirect flood flows?	☐	☐	☒	☐
d) In flood hazard, tsunami, or seiche zones, risk or release of pollutants due to project inundation?	☐	☐	☐	☒
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☐	☒

Discussion

a) The project site is located in an urbanized area and is currently developed with warehouse facilities, associated office/administrative facilities, loading docks, and surface parking. An existing drainage swale and underground stormwater storage is located at the northwestern project boundary. This swale would not be removed for implementation of the proposed project. There are also multiple stormwater drains located along Sandhill Avenue, and the closest one is located adjacent to the project site at the entrance along Sandhill Avenue.

As part of Clean Water Act section 402, the Environmental Protection Agency has established regulations under the National Pollutant Discharge Elimination System (NPDES) program to control direct storm water discharges. In California, the State Water Regional Control Board (SWRCB) administers the NPDES permitting program and is responsible for developing NPDES permitting requirements. The NPDES program regulates industrial pollutant discharges, which include construction activities. The SWRCB works in coordination with the nine Regional Water Quality Control Boards (RWQCB) to preserve, protect, enhance, and restore water quality. The project site is within the jurisdiction of the Los Angeles RWQCB. Impacts related to water quality typically range over three different periods: 1) during the earthwork and construction phase, when the potential for erosion, siltation, and sedimentation would be the greatest;

2) following construction, prior to the establishment of ground cover, when the erosion potential may remain relatively high; and 3) following completion of the project, when impacts related to sedimentation would decrease markedly, but those associated with urban runoff would increase.

Construction

Project construction could result in short-term impacts to water quality due to the handling, storage, and disposal of construction materials, maintenance and operation of construction equipment, and earthmoving activities. Potential pollutants associated with these activities could damage downstream waterbodies. Dischargers whose projects disturb 1 acre or more of soil or whose projects disturb less than 1 acre but are part of a larger common plan of development that in total disturbs 1 acre or more, are required to obtain coverage under the SWRCB's General Permit for Discharges of Stormwater Associated with Construction Activity Construction General Permit Order 2009- 0009-DWQ (General Construction Permit). The General Construction Permit requires the project Applicant to prepare and implement a stormwater pollution prevention plan (SWPPP). The SWPPP would specify BMPs to be used during construction of the project to minimize or avoid water pollution, thereby reducing potential short-term impacts to water quality. Upon completion of the project, the Applicant would be required to submit a Notice of Termination to the SWRCB to indicate that construction has been completed. Further, project construction activities would be required to comply with the water quality BMPs set forth in CMC chapter 8, Storm Water and Urban Runoff Pollution Control. This chapter contains the City's Storm Water Management and Discharge Control Ordinance and includes conditions and requirements established to control urban pollutant runoff into the City's stormwater system. Compliance with the General Construction Permit requirements and CMC chapter 8, Storm Water and Urban Runoff Pollution Control, would reduce the project's short-term impacts to water quality to less-than-significant levels.

Operation

The primary constituents of concern during the project operational phase would be solids, oils, and greases from parking areas, driveways, and truck loading bays that could be carried off site. Project design features would address the anticipated and expected pollutants of concern during the project's operational phase. On-site landscaping, which comprises approximately 13 percent of the total project site, would assist in minimizing the amount of runoff from the site by providing permeable areas for water infiltration and decreasing runoff volume. Infiltration through landscaped areas would also serve as a water treatment function. The project would include features such as curbs and gutters, vegetated swales and catch basins.

Requirements for waste discharges potentially affecting stormwater from project operations are set forth in CMC chapter 8, Storm Water and Urban Runoff Pollution Control. Standard Urban Stormwater Mitigation Plan (SUSMP) requirements include minimizing stormwater pollutants and limiting peak post-project stormwater runoff rates

to no greater than predevelopment rates where increased runoff could increase downstream erosion.

In general, projects control pollutants, pollutant loads, and runoff volume from the project site by minimizing the impervious surface area and controlling runoff through infiltration, bioretention, or rainfall harvest and use. Additionally, projects are required to incorporate BMPs as outlined in the SWPPP and in accordance with the requirements of the municipal NPDES permit. Compliance with these water quality and water discharge standards would ensure that the project would not degrade surface or ground water quality, and impacts would be less than significant.

b) The project site is located in an urbanized area and is currently developed with warehouse facilities, associated office/administrative facilities, loading docks, and surface parking. The project site is comprised of mostly impervious surfaces and does not serve as a source of groundwater recharge.

Additionally, no new sources of water supply, such as groundwater, are required to meet the proposed project's water demand. Potable water would be supplied by the Dominguez District of the California Water Service (Cal Water). Based on the 2015 Urban Water Management Plan (UWMP), the Dominguez District receives its water from 17 percent groundwater, 15 percent recycled water, and 68 percent purchased water. Purchased water is delivered from four Metropolitan Water District distribution feeders (Cal Water 2016). The project's proposed uses would not result in a substantial increase in demand for water above prior uses, and therefore, implementation of the proposed project would not significantly affect groundwater supplies. In addition, the proposed project would not substantially alter the amount of impervious surfaces on the project site, as compared with the existing conditions. Therefore, the project would not substantially deplete groundwater or interfere with groundwater recharge as compared to the prior uses on the project site and, thus, impacts would be less than significant.

c.i) No streams, rivers, or natural drainages occur on or in proximity to the project site. The project site is located in an urban area and is currently developed with impervious surfaces including warehouse facilities, associated office/administrative facilities, loading docks, and surface parking, and pervious areas including landscaped areas. Surface runoff from the project site is currently directed to the existing stormwater infrastructure (e.g., gutters, storm drains). While the project would not substantially alter the amount of impervious surfaces and landscaping, as compared to prior uses, as discussed above, during construction the project would still be required to comply with BMP's identified in the RWQCB issued SWPPP, which would reduce the potential for erosion or siltation to occur. During project operation, the project site would be fully developed and would not contain exposed soils. Therefore, compliance with BMPs would ensure that the project would not substantially alter the drainage pattern of the project site in a manner that would result in the substantial erosion or siltation on- or off-site and impacts would be less than significant.

c.ii) No streams, rivers, occur on or in proximity to the project site. The project site is located in an urban area and is currently developed with impervious surfaces including warehouse facilities, associated office/administrative facilities, loading docks, and surface parking, and pervious areas including landscaped areas. Surface runoff is currently directed to the existing stormwater infrastructure (e.g., gutters, storm drains) and would continue to be conveyed to City stormwater infrastructure. While the project would introduce new impervious surfaces and landscaping, this increase would not be substantial. Furthermore, the existing underground storm drain system would remain and continue to operate for the duration of project construction and operation. As such, the project would not substantially increase the rate of runoff and drainage patterns on the project site would be maintained. Therefore, a less-than-significant impact resulting from flooding would occur.

c.iii) The project site is located in an urban area and is currently developed with impervious surfaces including warehouse facilities, associated office/administrative facilities, loading docks, and surface parking, and pervious areas including landscaped areas. Surface runoff is currently directed to the existing stormwater infrastructure, which adequately serves the project site. As discussed above, the Applicant would be required to comply with the standard BMPs in the SWPPP, as identified by the RWQCB. Furthermore, the existing drainage pattern would remain largely the same under the proposed project, and thus, the project would be adequately served by the existing stormwater infrastructure at the site during project operations. Therefore, the proposed project would not exceed the capacity of existing or planned storm drain systems and impacts would be less than significant.

c.iv) The project site is not within 100-year flood hazard area as indicated by the Federal Emergency Management Agency (FEMA 2020). Further, the proposed project would adhere to all standards and requirements identified in the CMC and project-specific SWPPP, which would require implementation of measures that reduce the potential for flooding on- or off-site. Thus, adherence with these measures would ensure that impacts are less than significant.

d) As discussed above, the project site is not within 100-year flood hazard area as indicated by the Federal Emergency Management Agency (FEMA 2020). Further, the proposed project would adhere to all standards and requirements identified in the CMC and project-specific SWPPP, which would require implementation of measures that reduce the potential for flooding on- or off-site.

Due to the distance of the City to the Pacific Ocean, located approximately 6.5 miles west of the City, the potential for tsunami effects within the City is negligible. Furthermore, the absence of any large bodies of water within Carson preclude the possibility of damage from seiche effects on the project site (City of Carson 2004). Given the lack of flood hazard, tsunami, or seiche risk in the project area, there would be no impact.

e) There are no applicable water quality control plan or sustainable groundwater management plans to the project site. As stated above, the project site is located in an

urbanized area and is currently developed with warehouse facilities, associated office/administrative facilities, loading docks, and surface parking. The project site has been previously developed and does not serve as a source of groundwater. Therefore, the project would not conflict with or obstruct the implementation of a water quality control plan or sustainable groundwater management plan and there would be no impact.

XI. Land Use and Planning

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

Discussion

a) The project site is located in an urban area and is currently developed with warehouse facilities, associated office/administrative facilities, loading docks, and surface parking. Development of the project would not physically divide an established community as the proposed project would replace the prior warehouse use, with similar warehouse use. Furthermore, SCE owns a utility right-of-way, which creates a natural buffer between the existing industrial and residential land uses and this buffer would remain as part of the proposed project. Thus, the project would not divide an established community and there would be no impact.

b) According to the City of Carson General Plan, the project site has a land use designation of Light Industrial and a zoning code designation of Manufacturing Light (ML). The proposed project would not constrain or change the existing land uses within the project site and would replace the existing light industrial use with a similar use. Thus, there would be no change in land use and no impacts related to conflicts with applicable land use plans, policies, or regulations related to avoiding or mitigating an environmental effect would occur.

XII. Mineral Resources

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

Discussion

a) 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 1996). MRZ-2 zones are characterized as areas that are underlain by significant measured or indicated mineral resources. Additionally, according to the City's General Plan Safety Element, the City does not contain any known mineral resources (City of Carson 2004). However, 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) As described above, the project site is in MRZ-2 as identified by 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.

XIII. Noise

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

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.

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 feeling and pain, respectively. 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 continuous 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 p.m. to 7 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 p.m. to 10 p.m. and an addition of 10 dBA to the measured hourly noise levels between the nighttime hours of 10 p.m. to 7 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

CMC article 5, chapter 5, details the City's approach to noise control and standards. CMC section 5500 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. LACMC section 12.08.390(B) 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 22**, *City of Carson Exterior Noise Level Standards*. Noise measurement calculations are provided in Appendix E.

TABLE 22
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 p.m. to 7 a.m.	45 dBA
Residential Properties (daytime)	7 a.m. to 10 p.m.	50 dBA
III. Commercial Properties (nighttime)	10 p.m. to 7 a.m.	55 dBA
Commercial Properties (daytime)	7 a.m. to 10 p.m.	60 dBA
IV. Industrial Properties	Anytime	70 dBA

SOURCE: LACMC section 12.08.390.

CMC article 5, chapter 5, section 5502, provides a list of amendments added to the LACMC for application in the City of Carson. Section 5502(c) amends CMC chapter 12.08, part 4, to address 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 a.m. to 8 p.m. given construction does not exceed 65 dBA in single-family residential areas, 70 dBA in multi-family residential areas, and 70 dBA in semi-residential/commercial areas. Construction noise levels take precedence over the noise standards listed in **Table 22**, above. Section 5502(h) lists amendments to the LAMC for procedures for obtaining a variance from the requirements of CMC article 5, chapter 5, 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 23**, *City of Carson Guidelines for Noise Compatible Land Use*, 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.

City of Compton Municipal Code

The City of Compton Municipal Code (CPMC) section 7-12.4 sets ambient exterior noise levels. When "ambient noise level" is referred to in the CPMC, it refers to the higher of the following: (1) actual ambient noise level; or (2) presumed ambient noise level as determined from the values summarized in **Table 24**, *City of Compton Presumed Ambient Noise Levels*.

CPMC section 7-12.11 make sit unlawful to operate any machinery, equipment, pump, fan, air conditioning apparatus, or similar mechanical device which would exceed the ambient noise level by more than five decibels. Construction is permitted Monday through Saturday from 7 a.m. to 7 p.m.

City of Compton General Plan Noise Element

In addition to the previously described CPMC 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 Compton 2011). 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 25**, *City of Compton Guidelines for Noise Compatible Land Use*, 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 23
CITY OF CARSON 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

NOTES:

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 2002

TABLE 24
CITY OF COMPTON PRESUMED AMBIENT NOISE LEVELS

Zone	Time Interval	Hourly Equivalent Sound Level (dBA, L_{eq})				
		Very Quiet		Quiet	Slightly Noisy	
		Rural	Suburban	Suburban	Suburban	Urban
R1 and R2	10 p.m. to 7 a.m.	35	50	40	55	45
R1 and R2	7 p.m. to 10 p.m.	40	55	45	60	50
R1 and R2	7 a.m. to 7 p.m.	45	65	50	65	55
R3 and R4	10 p.m. to 7 a.m.	40	70	45	70	50
R3 and R4	7 a.m. to 10 p.m.	45	—	50	—	55

SOURCE: CPMC section 7-12.4

TABLE 25
CITY OF COMPTON GUIDELINES FOR NOISE COMPATIBLE LAND USE

Land Use Categories	Community Noise Exposure (CNEL, dB)			
	Normally Acceptable	Conditionally Acceptable	Normally Unacceptable	Clearly Unacceptable
Single-family, Duplex, Multiple-family	50–60	60–70	70–75	75–85
Mobile Homes, Mixed Use	50–60	60–65	65–75	75–85
Transient Lodging, Hotel, Motel	50–60	60–70	70–80	80–85
General Commercial, Retail	50–70	70–80	80–85	N/A
Office	50–65	65–75	75–80	80–85
Business Park, Research & Development	50–65	65–75	75–80	80–85
Manufacturing, Warehousing	50–70	70–85	N/A	N/A
Hospitals, Schools, Libraries	50–60	60–65	65–75	75–85
Churches, Civic Uses	50–70	70–80	80–85	N/A
Public Parks, Golf Course, Natural Habitat, Commercial Recreation	50–65	65–75	75–85	N/A

NOTES:

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 Compton 2011

Thresholds of Significance

The City of Carson's noise ordinances regulate 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:

> For sensitive receptors located in the City of Carson, project construction activities would generate noise levels in single-family residential areas that exceed a maximum of 65 dBA for single-family residential uses or a maximum of 70 dBA for multi-family residential, semi-residential, or commercial uses between the hours of 7 a.m. and 8 p.m., Monday through Saturday. For sensitive receptors located in the City of Compton, there are no upper noise limits for construction activity, however, project

construction activities must be limited to the hours of 7 a.m. to 7 p.m. Monday through Saturday and cannot occur on Sunday.

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 result in the exceedance of 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 Sandhill Avenue north of State Route 91, and is currently zoned as manufacturing, light (City of Carson 2015). The sensitive receptors identified below are compared to the significance threshold applicable to the jurisdiction in which they are located; either City of Carson or City of Compton, respectively. 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 1,220 feet away, there is the noise-sensitive Hemingway Memorial Park located in the City of Carson.

North – Land uses north of the project area consists of single-family residential uses approximately 160 feet from the project site and located in the City of Compton.

East – Land uses to the east of the project area consists of non-noise-sensitive industrial facilities. Further northeast of the project area, there is the noise-sensitive Caldwell Street Elementary School approximately 0.22 miles or 1,162 feet northeast from the project site located in the City of Compton.

South – Land uses to the south of the project area consists of non-noise-sensitive industrial uses.

Existing Conditions

The project is located in a highly urbanized area surrounded by a mixture of land uses including commercial, warehouse, and light industrial. The project is located north of State Route 91, east of South Avalon Boulevard, west of South Central Boulevard, and south of Hemingway memorial Park, Lincoln Memorial Park Cemetery, and various single-family residential uses.

To quantify the existing noise environment of the project site, one short-term (15-minute) noise measurements was conducted at location R1, located directly south of the project site along Sandhill Avenue. Ambient sound measurements were conducted on Thursday,

January 7, 2021, approximately 55 feet south of the project site, to characterize the existing noise environment in the project vicinity.

The ambient noise measurement was conducted in accordance with the City's standards. The ambient noise measurement was conducted using a Larson-Davis Model LxT Sound Level Meter (SLM). The Larson-Davis LxT SLM is a Type 1 standard instrument, as defined in the American National Standard Institute (ANSI) S1.4. The SLM was calibrated and operated according to manufacturer specifications. The SLM microphone was placed at a height of 5 feet above ground level.

This monitoring location provides a representative characterization of the existing noise conditions within the vicinity of the project site. The results of the ambient noise measurement data are summarized in **Table 26**, *Summary of Ambient Noise Measurements*. As shown in **Table 26**, the measured L_{eq} is 60.3 dBA. Since vehicular traffic is the dominant source for noise in the project area, and traffic volume along Sandhill Avenue is the same for the areas just to the north or to the south of the project site, it is anticipated that ambient noise level along Sandhill Avenue would be similar for receivers at similar distance from the roadway centerline.

TABLE 26
SUMMARY OF AMBIENT NOISE MEASUREMENTS

Site ID	Monitoring Date(s)	Start Time	End Time	L_{eq}	L_{max}	L_{min}
R1 South of project site along Sandhill Avenue	1/7/2021	11:10 a.m.	11:25 a.m.	60.3	78.9	47.8

SOURCE: ESA 2021

Construction Noise

Project construction is expected to commence in July 2021 and would last through September 2022. The project consists of (1) demolition of the existing structure, (2) grading/excavation, (3) building construction, and (4) architectural coating.

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.

Consistent with LACMC section 12.08.440 (which was adopted by reference by the City of Carson) and City of Compton Municipal Code, the construction noise levels were estimated at the property line of the closest sensitive receptor location. As previously stated the project site is surrounded by a mix of land uses, including light industrial, residential, and park uses. The closest sensitive receptors to the project site are the single-family residences to the north located approximately 160 feet from the project site and located in the City of Compton. The closest sensitive receptor within the City of Carson is Hemingway Memorial Park located approximately 1,220 feet northwest of the project site. It is conservatively assumed that multiple equipment would operate simultaneously. In reality equipment would likely be dispersed throughout the project site; therefore, the noise levels represent a conservative maximum and actual noise levels could be lower. Further, the closet sensitive receptors in each affected jurisdiction (residential uses and Hemingway Memorial Park) were analyzed and it is assumed that sensitive receptors located at further distances would experience lower noise levels than those disclosed below. Generally, noise attenuates at a rate of 6 dBA for every doubling of distance from the noise source.[12] **Table 27**, *Construction Equipment and Estimated Noise Levels*, presents the list of construction equipment including approximate quantities per construction phase with reference noise levels.

The estimated noise levels, shown in **Table 27**, assumes the project contractor(s) would equip the construction equipment, stationary or mobile, with properly operating and maintained noise mufflers, consistent with the manufacturers' standard operation procedures. These assumptions represent a worst-case noise scenario as all construction equipment used in a given phase would not typically operate concurrently and at full power, and the location of activities is routinely spread across the construction site, rather than concentrated close to the nearest noise-sensitive receptors.

As shown in **Table 27**, estimated construction noise levels at the nearest residential receptors range from 68 to 80 dBA L_{max}. The CPMC section 7-12.22 limits construction noise to between the hours of 7 a.m. and 7 p.m. The project construction would not occur outside of the allowable hours for construction and, therefore, would be less than significant for the residential receptors located in the City of Compton.

As shown in **Table 27**, estimated construction noise levels at the nearest receptor located in the City of Carson (Hemingway Memorial Park) range from 50 to 66 dBA L_{max}. CMC section 12.08, part 4, limits construction noise levels to 70 dBA L_{max} for semi-residential receptors between the hours of 7 a.m. and 8 p.m. The project construction noise levels per phase would not exceed 70 dBA L_{max} at the nearest sensitive source and impacts would be less than significant.

[12] Noise from a localized source (i.e., point source) propagates uniformly outward in a spherical pattern, referred to as "spherical spreading." Stationary point sources of noise, including stationary mobile sources such as idling vehicles, attenuate (i.e., reduce) at a rate between 6 dBA for acoustically "hard" sites for each doubling of distance from the reference measurement, Caltrans, Technical Noise Supplement, September, 2013.

TABLE 27
CONSTRUCTION EQUIPMENT AND ESTIMATED NOISE LEVELS

Construction Phase and Equipment	Noise Level L_{max} at 50 feet (dBA)	Hourly Quantity	Estimated Maximum Noise Level L_{max} at the Residences (dBA) per Phase	Estimated Hourly Noise Level L_{max} at Hemingway Memorial Park (dBA) per Phase
Demolition				
Concrete Saw	90	1	78	64
Excavator	81	3		
Rubber Tired Dozer	82	2		
Grading/Excavation				
Excavator	81	1	76	61
Grader	85	1		
Rubber Tired Dozer	82	1		
Tractor/Loader/Backhoe	80	3		
Building Construction				
Cranes	81	1	73	59
Forklift	81	1		
Generator Sets	75	3		
Tractor/Loader/Backhoe	80	3		
Welders	74	1		
Architectural Coating				
Cement and Mortar Mixers	78	1	68	50
Overlapping Phases – Demolition + Grading/Excavation	**—**	**—**	**80**	**66**

NOTE:

Noise Levels at 50 feet and Usage Factor are derived from Federal Highway Administration's Roadway Construction Noise Model User's Guide. Usage factors are the ratio of the time that a piece of equipment is in use to the total time that it could be in use. Usage factors are typically attributable to multiple pieces of equipment operating simultaneously.

SOURCE: ESA 2021

The project would comply with LACMC section 12.08.440 and CPMC section 7-12.22; the project's construction activities, including delivery and haul routes, would be prohibited between the hours of 7 p.m. and 7 a.m. Monday through Saturday or any time on Sundays or holidays.

Therefore, with respect to a violation of the noise standards and regulations established in the Los Angeles County Code and CPMC, potentially significant noise impacts during project construction would be less than significant through compliance with applicable regulations.

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. During the

most intensive phase of construction (building construction), the project would require 53 workers and 42 vendor trips per day. Typically, a doubling of traffic volumes increases the hourly equivalent sound level by approximately 3 dBA (FHWA 2018). The existing land use generates 714 daily trips. The temporary addition of the number of trips required per day during construction activities would not result in a doubling of trips and would be less trips than the existing site currently generates. Therefore, the increase in noise level would be substantially less than the threshold of a 5 dBA increase in an area characterized by normally acceptable and conditionally acceptable noise levels or a 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. Additionally, the off-site haul truck activities are temporary in nature and would only take place for 12 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. Typically, a doubling of traffic volumes increases the hourly equivalent sound level by approximately 3 dBA (FHWA 2018). The existing land use generates 714 daily trips and the project would add an additional 111 daily trips totaling 825 daily project trips. The project would not double existing daily trips and traffic noise from the project would generate less than a 3 dBA increase. Therefore, operation of the project would not result in a substantial increase in project-related traffic noise levels over existing traffic noise levels in the project vicinity. 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.

On-Site Operational Noise

Mechanical Equipment

The operation of mechanical equipment that would be installed for the new facility, such as air conditioners, fans, generators, and related equipment, would generate audible noise levels in proximity to the equipment. Mechanical equipment would typically be located on rooftops or within buildings, shielded from nearby land uses to attenuate noise and avoid conflicts with adjacent uses. All building outdoor mounted mechanical and electrical equipment would be designed to meet the requirements of Municipal Code section 12.08.390. A conservative exterior noise level reference for air condenser units, the primary source of noise from fixed mechanical equipment, is 81.9 dBA L_{eq} measured at a distance of 5 feet based on a review of noise data from several large shopping center projects in Southern California (Moreno Valley 2015; Pomona 2014).

The analysis conservatively assumes mechanical equipment would be mounted on the building rooftop at the closest edge to the sensitive receptors to the north. The sensitive receptors would be approximately 200 feet from the mechanical equipment (or 160 feet from the project's property line) and the noise level would attenuate by 32 dBA from distance divergence to 49.9 dBA L_{eq}. Since the ambient noise levels in the project vicinity (see ambient noise measurement R1) near this sensitive receiver already exceeded the City of Compton's noise standards for stationary operational noise sources, the determination of noise impact is then to compare project-related noise levels to the prevailing ambient noise levels at the sensitive receiver site. The projected noise level of 49.9 dBA Leq would not exceed the significant threshold of 65.3 dBA (ambient noise plus 5 dBA) Leq at the sensitive receptors. Therefore, environmental impacts related to the exposure of persons to or generation of noise levels in excess of established standards during long-term operation of the proposed project would be less than significant.

Loading Dock and Refuse Collection

The project would have on-site refuse collection areas located at the back of the building near the eastern and western loading dock openings and would be accessed from Sandhill Avenue to the south of the project site boundary.

Loading activities, such as truck movements/idling and loading/unloading operations, would generate noise levels of approximately 70 dBA Leq at a reference distance of 50 feet from the noisiest portion of the truck (i.e., to the side behind the cab and in line with the engine and exhaust stacks), based on a noise survey that was conducted by ESA at a loading dock facility, which shows that loading dock activity (namely idling semi-trucks and backup alarm beeps) would generate such noise levels. Refuse collection vehicles would travel on Sandhill Avenue for refuse pickup; however, refuse pickup generally lasts for several minutes similar to refuse pickup services for all other uses in the area, which would generate an incidental amount of noise and would not significantly contribute to permanent noise increases in the area.

Delivery truck idling is restricted to no more than 5 consecutive minutes in the loading area pursuant to State regulation (Title 13 California Code of Regulations [CCR],

section 2485). Pursuant to Title 13 CCR, section 2485, signs would be posted in delivery loading areas specifying this idling restriction. The project would include an exterior loading dock with 20 loading bays. Based on the project's trip generation, a maximum of 20 truck trips would occur during peak hour conditions. Loading area noise levels at the noise sensitive receptors are summarized in **Table 28**, *Estimated Loading Area Noise Levels*. As shown, the project's loading area noise contribution would not increase the ambient noise by more than 5 dBA; therefore, impacts would be less than significant.

TABLE 28
ESTIMATED LOADING AREA NOISE LEVELS (L_{EQ})

Receptor Location	Distance to Receptor Property Line (feet)	Existing Ambient Noise Levels, dBA (L_{eq})[a]	Estimated Loading Area Noise Levels, dBA (L_{eq})	Ambient + Project Noise Levels, dBA (L_{eq})	Significance Threshold, dBA (L_{eq})	Exceed Significance Threshold
Residential uses to the north	160	60.3	59.9	63.1	65.3	No

NOTE:

[a] Existing ambient noise measurement was taken along Sandhill Avenue and is representative of the noise environment in the surrounding area. Noise measurement data is provided as part of Appendix E

SOURCE: ESA 2021

Composite Noise Impacts from Project Operations

An evaluation of the combined noise from the project's various operational noise sources (i.e., composite noise level) was conducted to conservatively ascertain the potential maximum project-related noise level increase that may occur at the noise-sensitive receptor locations included in this analysis. Noise sources associated with the project would include on-site mechanical equipment, loading/refuse area, and parking area.

Composite noise levels at the noise sensitive receptors are summarized in **Table 29**, *Estimated Composite Noise Levels from Project Operations*. As shown, the project's composite noise contribution would not increase the ambient noise by more than 5 dBA; therefore, impacts would be less than significant.

TABLE 29
ESTIMATED COMPOSITE NOISE LEVELS FROM PROJECT OPERATIONS

	Residential Sensitive Receptors (160 feet north)
Operational Noise Sources	**Noise Levels, dBA Leq**
Existing (Ambient) Noise Level (A)	60.3
Project Composite Noise Sources	
Mechanical equipment	49.9
Loading Area	59.1
Parking Area	34.1
Project Composite Noise Level (B)	**59.6**
Existing Plus Project Composite Noise Level (C) = (A) + (B)[a]	**63.0**
Project Increment (C minus A)	2.7
Exceeds Threshold?	No

NOTE:
[a] Values are added logarithmically (not linearly).
SOURCE: ESA 2021

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 groundborne vibration. Post-construction on-site activities would be limited to industrial uses that would not generate excessive groundborne vibration.

Vibration Principles and Descriptors

Groundborne vibration from development is primarily generated from the operation of construction equipment and from vehicle traffic. Groundborne 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 groundborne noise. Vibration levels for potential structural damage is described in terms of the peak particle velocity (PPV) measured in inches per second (in/sec).

Groundborne 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 groundborne 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. Groundborne 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 and City of Compton do not address vibration either in their respective municipal codes or in the Noise Element of their General Plans. With respect to groundborne vibration from construction activities, the California Department of Transportation (Caltrans) has adopted guidelines/recommendations to limit groundborne 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 groundborne 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 north of the project, which are approximately 160 feet from the project site. At a distance of 160 feet, the maximum vibration level (using large bulldozer as an example, as shown above) 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.

Groundborne 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). 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 160 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 located approximately 0.7 miles from Compton/Woodley Airport. However, the project site is located outside of the airport's 65 dBA CNEL noise contour and outside of the airport influence area according to the City of Compton General Plan Noise Element (City of Compton 2011). Therefore, construction or operation of the project would not expose people to excessive airport related noise levels and impacts would be less than significant.

XIV. Population and Housing

Issues (and Supporting Information Sources)	*Potentially Significant Impact*	*Less than Significant with Mitigation Incorporated*	*Less-than-Significant Impact*	*No Impact*
XIV. POPULATION AND HOUSING—Would the project:				
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☒	☐
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

Discussion

a) 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 an urbanized area and is fully developed with warehouse facilities, associated office/administrative facilities, loading docks, and surface parking. The proposed project would develop similar industrial uses, with a building of a similar height and size, as allowed by the CMC. Given these uses, the proposed project would not induce direct population growth.

Employment opportunities during operation of the proposed project are not anticipated to substantially increase the population or housing in the area, since the employees and patients of the proposed office, medical office, and retail uses would likely already live in or near the existing urbanized project area or consist of regional commuters. Further, indirect growth from extension of roads and infrastructure would not be anticipated, as the proposed project would not add any new roadways, and would be served by existing infrastructure with minor proposed upgrades and connections to accommodate the proposed project. Therefore, the proposed project would not introduce unplanned infrastructure that was not previously evaluated in the adopted in the General Plan. Therefore, the proposed project would not result in a substantial population increase during operation, and impacts would be less than significant.

b) The project site is located in an urbanized area, is fully developed with industrial uses and does not contain any housing. Implementation of the project would replace the existing uses with a similar industrial warehouse. Therefore, no displacement of substantial quantity of existing residences would occur.

XV. Public Services

Issues (and Supporting Information Sources)	*Potentially Significant Impact*	*Less than Significant with Mitigation Incorporated*	*Less-than-Significant Impact*	*No Impact*
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?	☐	☐	☒	☐
ii) Police protection?	☐	☐	☒	☐
iii) Schools?	☐	☐	☐	☒
iv) Parks?	☐	☐	☐	☒
v) Other public facilities?	☐	☐	☐	☒

Discussion

a.i) The project site is currently served by LACFD. The LACFD responds from six fire stations located within the City of Carson and the closest station to the project site is LACDFD Station 116, approximately 0.9 miles south of the project site at 755 Victoria Street (LACFD 2020).

Construction

Construction of the proposed project could increase the potential for onsite fires from such sources as the operation of mechanical equipment, the use of flammable construction materials, or the careless disposal of cigarettes. However, implementation of "good housekeeping" procedures by the construction contractors and the work crews would minimize fire hazards associated with the construction of the proposed project. Such measures would be in effect during construction of the proposed project.

Construction activities could also have the potential to affect fire protection services, such as emergency vehicle response times, by adding construction traffic to the street network and by partial lane closures during street improvements, utility installations, and construction staging. However, these impacts would be less than significant, as the as any lane closures would occur after review and approval by the LACFD, which would minimize the effects of construction on vehicular traffic, including emergency vehicles, and assist in the orderly flow of vehicular circulation in the area of the project.

In summary, project construction would be temporary in nature and, thus, would not require additional fire protection and emergency services to the extent that there would be a need for new or expanded fire facilities in order to maintain acceptable service ratios, response times, or other performance objectives of the LACFD. Therefore, construction-related impacts to fire protection services would be less than significant.

Operation

The proposed project would replace the existing industrial use with a similar industrial use. The proposed project would be served by the LACD Station 116, located at 755 Victoria Street approximately 0.9 miles south of the project site (LACFD 2020). Furthermore, as the proposed project's uses would be similar to prior uses, project operation would not result in a substantial change in need for fire protection services over what was previously required. Additionally, as required by the California Health and Safety Code, the proposed project would be required to comply with all requirements pertaining to fire protection systems, such as the adequate provisions of smoke alarms, fire extinguishers, building access, emergency response notification systems, and fire flows. With adherence to California Health and Safety Code, LACFD standards and regulations, the proposed project would install adequate fire protection systems and, thus, would not result in the need for new or physically altered governmental facilities, the construction of which could cause a significant environmental impact. Therefore, impacts to fire protection services would be less than significant.

a.ii) The project site is served by the Los Angeles County Sheriff's Department (LASD) Carson Station located approximately 3.2 miles southwest of the project site at 21356 Avalon Boulevard (LASD 2020).

As discussed in response to Threshold a.i), above, the proposed project's uses would be consistent with prior uses on the project site. Thus, implementation of the project would not significantly increase demand for police protection services provided by the LASD. In addition, the project would be subject to site plan review by the City prior to project approval to ensure that it meets City requirements in regard to safety (e.g., nighttime security lighting); thus, discouraging criminal activity and reducing demand for police protection services. As such, the project would not require LASD to expand or construct new stations to serve the project site and impacts would be less than significant.

a.iii) The proposed project does not include a residential component, which would create housing or any other facility that would increase the local population that would require an increase of student at local schools. Therefore, no impact would occur.

a.iv) 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 4 acres per 1,000 residents. The closest park to the project site is Vernon Hemingway Memorial Park, located approximately 0.5 miles west of the project site at 710-735 East Gardena Boulevard (County of Los Angeles 2020). The proposed project would develop industrial uses and would result in an increase in employees at the site. The project would not introduce inhabitants to the project area that would require the use of parks or recreational facilities in the vicinity of the project site. Therefore, no impact would occur.

a.v) The project would not introduce inhabitants to the project area that would require the use of library facilities in the vicinity of the project site. Therefore, no impact would occur.

XVI. Recreation

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

Discussion

a) As the project does not include residential uses, the project would not result in increased use of recreational facilities. See also response to Section XV, *Public Services*, Threshold a.iv), above. Therefore, no impact to neighborhood and regional parks or other recreational facilities would occur.

b) The proposed project would not include the construction or expansion of recreational facilities. Therefore, no impact would occur.

XVII. Transportation

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

Background

This section is based on the Trip Generation Analysis (TGA) for the 1055 E. Sandhill Avenue project prepared by Translutions Inc., March 2021, which is included in Appendix F, *1055 E. Sandhill Avenue Project Trip Generation Analysis*. The TGA 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 bound by a SCE easement to the north, existing industrial uses to the east and west, and East Sandhill Avenue to the south. Immediately adjacent to the project site on east, west, and south are properties that support similar industrial and/or manufacturing uses. Access to the proposed project site is provided by driveways on E. Sandhill Avenue.

Existing Trip Generation

The project site has several buildings currently occupied by General Mills; however, the site has not been in operation since March, 2020. These existing buildings will be demolished once the project is completed and will lead to a reduction of trips from the existing baseline conditions. Therefore, the existing trips for the existing buildings are subtracted from the proposed project trips to identify the net new trip generation. The trip generation for existing uses were generated using rates from the Institute of Transportation Engineers' (ITE) *Trip Generation (10th Edition)* and are based on *Land Use 110 – "General Light Industrial"* traffic counts that were collected at the existing driveways. Recommended Truck Mix Percentages were based on the *City of Fontana Truck Trip Generation Study for Heavy Warehouse Uses*, August 2003. As shown in the TGA, the existing facility would generate 78 AM peak hour trips, 71 PM peak hour trips, and 544 daily trips. Truck intensive uses are typically evaluated by converting truck trips to Passenger Car Equivalents (PCEs). Truck trips were converted to PCEs using conversion rates of 1.5 for 2-axle trucks, 2.0 for 3-axle trucks and 3.0 for 4 or more axle

trucks. As detailed in the TGA, the existing facility generates 104 AM peak hour PCE trips, 95 PM peak hour PCE trips, and 714 daily PCE trips.

Project Trip Generation

Trip generation for the proposed project is based on the same methodology as the trip generation for existing uses. As detailed in the TGA, the proposed project would generate 91 AM peak hour trips, 81 PM peak hour trips, and 628 daily trips. Truck trips were converted to PCEs using conversion rates of 1.5 for 2-axle trucks, 2.0 for 3-axle trucks and 3.0 for 4 or more axle trucks. As identified in the TGA, the proposed project would generate 120 AM peak hour PCE trips, 107 PM peak hour PCE trips, and 825 daily PCE trips.

Net New Project Trip Generation

Since the existing buildings would be demolished once the project is completed, the trips associated with the existing uses would be subtracted from the proposed project trip generation to obtain the net new trip generation. As shown in the TGA, the proposed project is anticipated to generate 13 net new AM peak hour trips, 10 net new PM peak hour trips, and 84 net new daily trips. Truck trips were converted to PCEs using conversion rates of 1.5 for 2-axle trucks, 2.0 for 3-axle trucks and 3.0 for 4 or more axle trucks. As identified in the TGA, the proposed project would generate 16 net new AM peak hour PCE trips, 12 net new PM peak hour PCE trips, and 11 net new daily PCE trips.

Conclusion

The City of Carson generally requires a traffic study if the trip generation of a project is more than 50 trips during a peak hour. Based on the above calculations, the project is forecast to generate 16 net new AM peak hour PCE trips and 12 net new PM peak hour PCE trips. Since the trip generation of the project is less than 50 trips during any peak hour, a traffic study is not required for the project. Further, the project is forecast to generate 84 new vehicle trips per day, the project related impacts on VMT should be considered less than significant since the project generates less than 110 daily vehicle trips.

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. 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.

Many local agencies have developed screening thresholds to indicate when detailed analysis is needed. However, the City has not adopted any thresholds yet. The Governor's Office of Planning and Research (OPR), in the Technical Advisory, states that, "*Absent substantial evidence indicating that a project would generate a potentially significant*

level of VMT, or inconsistency with a Sustainable Communities Strategy (SCS) or general plan, projects that generate or attract fewer than 110 trips per day generally may be assumed to cause a less-than-significant transportation impact." The proposed project would generate 84 new trips per day and, therefore, the impact on VMT can be considered to be less than significant.

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 would be designed and required to adhere to the requirements of the applicable Fire Code, impacts related to emergency access would be less than significant.

XVIII. Tribal Cultural Resources

Issues (and Supporting Information Sources)	*Potentially Significant Impact*	*Less than Significant with Mitigation Incorporated*	*Less-than-Significant Impact*	*No Impact*
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	☐	☒	☐	☐
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.	☐	☒	☐	☐

Discussion

a.i, a.ii) The NAHC maintains a confidential Sacred Land File (SLF), which contains records of sites of traditional, cultural, or religious value to the Native American community. The NAHC was contacted on November 11, 2020, to request a search of the SLF. The NAHC responded to the request in a letter dated January 7, 2020, with the results of the SLF search conducted by the NAHC indicated a positive search result. The NAHC indicated that the Gabrieleno Band of Mission Indians - Kizh Nation should be contacted for information regarding known and recorded sites. The City contacted the Gabrieleno Band of Mission Indians - Kizh Nation as part of AB 52 consultation for more information on the project site and vicinity.

Additionally, a records search was requested from the SCCIC on November 11, 2020, and archival research was done in house to determine whether the study area contains any recorded cultural resources that have been previously identified or evaluated. This includes data on prehistoric sites, historic sites, multicomponent sites, prehistoric isolates, historic period isolates, and historic built resources within the project site and a 0.5-mile radius around it.

The records search included a review of all recorded archaeological resources and previous studies within a 0.5-mile radius of the project site. The records search results indicate that five cultural resources studies have been conducted within a 0.5-mile radius of the project site. Approximately 75 percent of the 0.5-mile records search radius has been included in previous cultural resources studies. Of the 5 previous studies, one (LA-12715) previously included the project site. This study is a Cultural Resources Inventory of the City of Carson from 1977. Additionally, the records search revealed that one cultural historic resource has been previously recorded within the 0.5-mile radius of the project site. This is a steel lattice

transmission tower within the Southern California Edison right-of-way. The tower was built prior to 1969 and was found ineligible under the National Register of Historic Places. No resources have been recorded within the project site.

Pursuant to the requirements of AB 52 requiring government-to-government consultation, the City, as the lead agency, sent consultation notification letters via certified mail to Native American groups geographically and culturally affiliated with the project site on December 16, 2020. The letters included a description of the project, the description of the project location, and a notification of the type of consultation being initiated. To date, the City has received one response from the Native American groups regarding consultation, the details of which are provided below.

As indicated above, only one response was received. The Gabrieleno Band of Mission Indians-Kizh Nation responded on March 8, 2021, stating that the project site is located within the tribe's traditional ancestral territory and requested formal government-to-government consultation. The Gabrieleno Band of Mission Indians-Kizh Nation provided a map of the Kizh Nation Ancestral Tribal Territory. On February 3, 2021, representatives from the City and the Gabrieleno Band of Mission Indians-Kizh Nation met via a telephone conference. During the call, the Gabrieleno Band of Mission Indians-Kizh Nation provided their knowledge of the project site and the nearby village of *Weniinga*, and their concerns about the sensitivity of the project. The City provided information and results of the cultural resources study and discussed the sensitivity of the site. The Gabrieleno Band of Mission Indians-Kizh Nation indicated that the project site is archaeologically sensitive, but did not identify any known tribal cultural resources (as defined in Public Resources Code section 21074) within the project site. The Tribe recommended monitoring during construction and the City agreed with this recommendation and the Tribe and the City agreed to close consultation. The Tribe agreed to provide updated mitigation measures they would like used for the project which includes a recommendation for an interpretive display which the City intends to include in the project.

Although no substantial evidence was provided to support the Kizh Tribal claim that any known sacred lands or tribal cultural resources overlap with or occur within the project site, the City's review of the Kizh Tribal information concludes that the project site has potentially high sensitivity for buried archaeological resources that, once encountered, could potentially be considered a tribal cultural resource as defined in PRC sections 21074, 5020.1(k), or 5024.1.

Should any unanticipated prehistoric archaeological resources be determined during consultation between the Tribes and the City to potentially be tribal cultural resources, PRC section 21084.3 would apply. Should the lead agency (City) determine that the project may cause a substantial adverse change to a tribal cultural resource, the agency will need to consider avoidance and preservation of the resources as well as mitigation measures outlined in PRC section 21084.3(b)(1)–(4), which can be considered to avoid or minimize the significant adverse impacts. As stated above, as required by AB 52, consultation between the City and the Gabrieleno Band of Mission Indians-Kizh Nation was conducted.

No identified tribal cultural resources as defined in PRC section 21074(a)(1) that are 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) have been identified within the project site. However, implementation of Mitigation Measure MM-TCR-1. would avoid and/or substantially lessen the above impact by ensuring that any unanticipated tribal cultural resources are appropriately identified, documented, evaluated, and treated promptly, so they are not inadvertently damaged or destroyed. With implementation of Mitigation Measures MM-TCR-1 and MM-TCR-2, the impact to any unanticipated Tribal cultural resources would be less than significant.

Mitigation Measures

MM-TCR-1: Native American Monitoring. Prior to the commencement of any ground disturbing activity at the project site, the City shall retain a Native American Monitor approved by the Gabrieleno Band of Mission Indians –Kizh Nation – the tribe that consulted on this project pursuant to AB 52. The Tribal monitor will only be present on-site during the construction phases that involve ground-disturbing activity. Ground disturbing activities are defined by the Tribe as activities that may include, but are not limited to, pavement removal, potholing, or auguring, grubbing, tree removals, boring, grading, excavation, drilling, and trenching within the project site. The on-site Tribal monitoring shall end when all ground-disturbing activities on the project site are completed, or when the Tribal representatives and Tribal Monitor have indicated that the project site has little to no potential for impacting Tribal Cultural Resources.

Upon discovery of any Tribal Cultural Resources, construction activities shall cease within 50-feet in the immediate vicinity of the find, until the find can be assessed. All Tribal Cultural Resources unearthed by the project shall be evaluated by the Tribal monitor approved by the Consulting Tribe and the qualified archaeologist. If the resources are Native American in origin, the Consulting Tribe will retain it/them in the form and /or manner the Tribe deems appropriate, for education, cultural and/or historic purposes. Work may continue in other parts of the project site while evaluation, and if necessary mitigation takes place. Preservation in place is the preferred manner of treatment. If preservation in place is not feasible, treatment may include implementation of archaeological data recovery excavation to remove the resources along with laboratory processing and analysis.

MM-TCR-2: Historical Marker. The project location represents a Tribal Cultural Landscape where prehistoric and historical events have occurred. To preserve the historical events and information of the project site, the City shall work alongside the Kizh Tribe to create language to be used in a historical marker and/or informative plaque or kiosk to be placed on the project site for the edification of all future generations.

XIX. Utilities and Service Systems

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

Discussion

a) ***Water***

During construction activities, there would be a temporary, intermittent demand for water for such activities as soil watering for site preparation, fugitive dust control, concrete preparation, painting, cleanup, and other short-term activities. Construction-related water usage is not expected to have an adverse impact on available water supplies or the existing water distribution system, and impacts would be less than significant.

No new sources of water supply, such as groundwater, are required to meet the proposed project's water demand. Potable water would be supplied by the Dominguez District of the California Water Service (Cal Water). Based on the 2015 Urban Water Management Plan (UWMP), the Dominguez District receives its water from 17 percent groundwater, 15 percent recycled water, and 68 percent purchased water. Purchased water is delivered from four Metropolitan Water District distribution feeders (Cal Water, 2016).

Wastewater Treatment

The Los Angeles County Sanitation Districts provide wastewater treatment for much of Los Angeles County including the project site. Wastewater generated by the proposed project would be treated at the LACSD's Joint Water Pollution Control Plant (JWPCP) located in the City of Carson, which has a capacity of 400 million gallons per day (mgd) and currently processes an average flow of 261.1 mgd (LACSD, 2008). The capacity of this facility is limited to levels associated with approved growth identified by the SCAG.

In addition, payment of a standard sewer connection fee and ongoing user fees would be required to ensure that sufficient capacity is available.

As the project is consistent with the land use designation and zoning for the site, and payment of standard sewer connection fees and ongoing user fees would ensure that sufficient capacity is available. Therefore, it is not anticipated that project implementation would require construction of new or the expansion of existing wastewater facilities and impacts would be less than significant.

Stormwater

The proposed project would construct a new network of storm drain lines on-site that would ultimately connect to the existing municipal storm drain system or the existing drainage swale and underground storage system located beneath the project site.

As discussed above in response to Section X, *Hydrology and Water Quality*, Threshold a, the project would be required to complete a SWPPP in accordance with the NPDES, which would reduce the potential for stormwater impacts on- and off-site. Furthermore, once implementation of the project is complete, the project site would contain approximately 13 percent landscaped areas

Electric Power and Telecommunications

The project site is located within an existing industrial complex with existing warehouse facilities, associated office/administrative facilities, loading docks, and surface parking in the City of Carson, which is currently served by electric power and telecommunications providers. With regard to existing electrical distribution lines, the project would be required to coordinate electrical infrastructure removals or relocations with SCE and comply with site-specific requirements set forth by SCE, which would ensure that service disruptions and potential impacts associated with grading, construction, and development within SCE easements would be minimized. Implementation of the project would not require the extension of or new electric power and telecommunication infrastructure and there would be no impact.

b) The proposed project would not increase water demand such that new or expanded entitlements are needed. The Dominguez District of Cal Water currently serves the project site and the proposed project would generate minimal additional water demand. Therefore, impacts to water supply would be less than significant.

c) The JWPCP serves the project site and the capacity of this facility is limited to levels associated with approved growth identified by the SCAG. As discussed above in response to checklist question XIX (a), the project would generate minimal amounts of wastewater, which would be treated at the JWPCP. Therefore, a less-than-significant impact would occur.

d) A substantial amount of solid waste is disposed of throughout the region, requiring ongoing landfill expansions. According to the City General Plan, solid waste generated

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

In addition, according to the 2019 Annual Report for the Countywide Integrated Waste Management Plan (CIWMP), the remaining capacity at County-operated landfills is 148.40 million tons (County of Los Angeles, 2020). Construction of the project would generate solid waste including wood, metals, soils, and other construction-related materials. However, as required by the Construction and Demolition Debris Recycling and Reuse Program (C&D) Program, the project would be required to divert a minimum of 65 percent of C&D waste from landfills. As the project would be required to divert 65 percent of solid waste from landfills, the remaining capacity of County-operated landfills would be minimally affected due to construction.

All collection, transportation, and disposal of any solid waste generated by the project during construction and operation would comply with all applicable federal, State, and local statutes and regulations. In particular, AB 939 requires that at least 50% of solid waste generated by a jurisdiction be diverted from landfill disposal through source reduction, recycling, or composting. Cities, counties, and regional agencies are required to develop a waste management plan that would achieve a 50% diversion from landfills (PRC section 40000 et seq.). Furthermore, as required by existing regulations, any hazardous materials collected on the project site during demolition, construction, or operational activities would be transported and disposed of by a permitted and licensed hazardous materials service provider at a facility permitted to accept such hazardous materials. As such, the project is not anticipated to generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals. Therefore, this impact would be less than significant.

e) 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. The proposed project would comply with all Federal, State, and local statutes and regulations related to solid

waste, including the California Integrated Waste Management Act and City requirements for solid waste generated during project construction and operation. Less than significant impacts would occur.

XX. Wildfire

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

Discussion

a) The City has prepared a Multi-Hazard Functional Plan (1996) for emergency response within the city (City of Carson 2004). 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 0.5-mile intervals would serve as potential evacuation routes during a disaster. Potential evacuation routes that occur near the site include: Artesia Boulevard, Avalon Boulevard, Central Avenue, and Wilmington 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) The project site is located in an 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) As described above, the proposed project would not require the installation or maintenance of associated infrastructure. The project site is currently developed with warehouse facilities, associated office/ administrative facilities, loading docks, and surface parking. As the project would be constructed in compliance with the 2019 CBC and 2019 CFC, 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) As described above, the project site is located in an 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 warehouse facilities, 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) and onsite drainage facilities. 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.

XXI. Mandatory Findings of Significance

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

Discussion

a) The project site is an existing industrial complex and contains eight warehouses that served as a refrigerated food production plant, and development of the project would modify the site, but would replace the existing uses with a similar use; 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 animals. As indicated in Section V, *Cultural Resources*, Section VII, *Geology and Soils*, and Section XVIII, *Tribal Cultural Resources*, project implementation is not anticipated to result in impacts to cultural or tribal cultural resources based on the project site's disturbed condition and past use as an industrial site. However, in the event that archaeological resources, human remains, or paleontological resources are encountered during construction, Mitigation Measures MM-CULT-1, MM-CULT-2, and MM-GEO-1 would require all project construction activities to halt until qualified experts identify the significance of the find and recommend a course of action. Furthermore, to reduce impacts to tribal cultural resources, the project would implement Mitigation Measures MM-TCR-1 and MM-TCR-2, which would ensure that any unanticipated tribal cultural resources are appropriately identified, documented, evaluated, and treated promptly, so they are not inadvertently damaged or destroyed. Therefore, the proposed project would not potentially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of

California history or prehistory. Therefore, a less-than-significant impact would occur with mitigation.

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. 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.

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CHAPTER 4
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