Errata to the

FINAL ENVIROMENTAL IMPACT REPORT

Imperial Avalon Mixed-Use Project

SCH# 2021010116
November 2022

Prepared for:

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(SCH No. 2021010116)

NOVEMBER 2022

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1 Introduction

The City of Carson (City) has prepared this Errata to clarify information in the Final Environmental Impact Report (EIR) for the proposed Imperial Avalon Mixed-Use Project (Project). This Errata includes minor edits to the Final EIR for the Project and subsequent revisions herein do not contain significant new information that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the Project or a feasible way to mitigate or avoid such an effect. Additionally, information clarified in the Final EIR does not present a *new* feasible Project alternative or new mitigation measures considerably different from others previously analyzed in the Draft EIR.

All of the information within this errata merely clarifies, amplifies, or makes insignificant modifications in the Final EIR. New information added to the Final EIR is not "significant", and recirculation of the Draft EIR is not required (see CEQA Guidelines Section 15088.5). As discussed in Section 3 of this Errata, the City has reviewed the information in this Errata and has determined that it does not change any of the findings or conclusions of the Final EIR and does not constitute "significant new information" pursuant to CEQA Guidelines Section 15088.5.

In conformance with Section 15121 of the CEQA Guidelines, the Draft EIR, Final EIR, technical appendices and reports thereof, together with this Errata to the Final EIR are intended to serve as documents that will generally inform the decision-makers and the public of environmental effects of the Project. This Errata, combined with the Draft EIR Comments, Responses to Comments, Changes to the Draft EIR, and Mitigation Monitoring and Reporting Program, comprises the Final EIR.

2 Additional and Clarifying Information Regarding the Final EIR

2.1 Selection of an Alternative over the Project

2.1.1 Background

During the process in which the City has been preparing to bring forth the Project to the City's decision-makers for consideration, City staff has been working with the Project Applicant to identify ways to meet the Project Objectives while also being sensitive to concerns raised during the planning process about the Project's density, scale, and compatibility with the surrounding neighborhood. After deliberation between the City and Project Applicant, the Applicant has updated the site plan consistent with the project details analyzed in Alternative 3, the Reduced Density and Sensitive Transition Alternative, for the City's decision-makers consideration in lieu of the Project. Generally, this alternative involves a development similar to and within the same footprint as the Project, but involving a lower density residential component and at a smaller scale. Because Alternative 3 and its environmental impacts were discussed in detail within the Draft EIR, the City's decisionmakers have the discretion to approve Alternative 3 over the Project and certify the EIR without further analysis. Given that the Project includes both the Imperial Avalon Specific Plan (IASP) and a development proposal, the IASP is still being brought forth for consideration with minor changes. The IASP has not been substantially revised such that additional uses or intensities would be permitted (see Section 2.1.2). Should the City's decision-makers choose to approve Alternative 3, they would be approving the IASP and the specific development discussed within Alternative 3. This section of

the Errata provides additional specific information regarding the development proposal outlined within Alternative 3.

2.1.2 Alternative 3 Description

Refinements to Alternative 3

Alternative 3 was initially discussed within Chapter 6, Alternatives, of the Draft EIR. Since the time that Alternative 3 was first described within the Draft EIR, a detailed site plan has been prepared. During the preparation of the more detailed site plan , Alternative 3 has been refined.. These minor refinements to Alternative 3 include:

- One less non-age restricted apartment unit
- The publicly accessible park has increased in size from 21,000 square feet to 22,589 square feet and has been relocated from the central portion of the Project site to along Avalon Boulevard
- Commercial space decreased from 10,352 square feet to 10,000 square feet
- All commercial space would be for a restaurant instead of a restaurant and café
- The more evolved and detailed architectural plans reflect a modern agrarian vocabulary

This section builds on the narrative description included within the Draft EIR and provides specific details now that a site plan concept that been further developed.

Alternative 3 Components

Overview

Alternative 3 involves (1) the adoption of the IASP, which would establish a new regulating plan within the IASP area (Project site) and allow for the development of residential, commercial, recreational/open space uses, and (2) implementation of the IASP through the development of a specific development proposal, which involves relocation or disposal of existing mobile home coaches, demolition of other existing on-site structures, and the development of a mixed-use neighborhood containing multifamily residences, townhomes, neighborhood-serving commercial uses, open space and recreation opportunities, and associated parking areas. Collectively, the IASP and implementation of the specific development proposal constitute Alternative 3 analyzed in this EIR and are referred to as "Alternative 3." Thus, Alternative 3, as evaluated in the EIR and this Errata, and similar to the project analyzed in the DEIR, would involve (1) a General Plan Amendment to change the Project site's General Plan Land Use Designation from Regional Commercial and Low Density Residential to Urban Residential, (2) a zone change to change the Project site's zoning from Commercial, Automotive and RM-8-D zone to Specific Plan, (3) adoption of the IASP, (4) site plan and design review (5) a tentative tract map to facilitate the construction of the proposed development, and (6) approval of a development agreement.

Alternative 3 Development Proposal

The primary difference between Alternative 3 and the Project is the specific development that would be constructed.

Figure 1, Site Plan, presents the proposed development for Alternative 3. As with the project evaluated in the DEIR Alternative 3 would involve removal of the existing site uses and construction of a mixed-use neighborhood containing multifamily residences, townhomes, neighborhood-serving commercial uses, open space, and parking.

The Alternative 3 development generally consists of two interconnected halves where the western portion of the site would be developed with for-sale three-story townhomes, and the eastern half of the site would be developed with multistory mixed-use buildings of up to six stories. The multistory mixed-use buildings would provide a mix of services, restaurants, open space/recreation, and a range of multifamily housing types, including senior living. The Development Agreement processed for the Alternative 3 project would also require an affordable housing benefit to the City which could be satisfied either by providing deed restricted affordable units on-site, off-site, or through payment of an in-lieu fee. The various housing types across the entire site would form an integrated community connected by public and private open spaces, including an approximately 23,000-square-foot park and dog park, as well as walkable paseos, and plaza spaces. Subject to Los Angeles County Flood Control review and approval, an accessible pedestrian bridge (American with Disabilities Act (ADA) compliant) over the Torrance Lateral Drainage Canal to the north of the site has been proposed to provide pedestrian connectivity between the future development located within the District Specific Plan Area to the north. The bridge would provide both pedestrian and bicycle access. Additionally, the currently stop-controlled Grace Avenue/213th Street intersection would be signalized to provide enhanced vehicular access to the development. A summary of Alternative 3 is presented in Table 1.

Table 1. Alternative 3 Buildout Summary

Metric	Information
Project Site	1,189,739 Square Feet/ 27.31 acres
Total Residential Units	1,115 Units
Apartments – Non-age restricted	681 units
Apartments – Senior, age-restricted	83 Units
Townhomes	351 Units
Commercial Area	10,000 Square Feet
Residential Parking	2,003 Stalls
Commercial Parking	23 Stalls
Publicly Accessible Park Space	222,859 Square Feet

Notes: All measurements, square footages, and building area ratios provided in this table are approximated.

East Neighborhood (Multistory Mixed-Use Component)

The eastern portion of the Project site would contain two multistory mixed-use buildings. The buildings would generally be configured whereby residences would be wrapped around or located above centralized parking structures.

Building A-B will be a four-story wrap building approximately 65 feet tall with residential units, resident leasing office, swimming pool, fitness center, multiple courtyards and recreational amenity spaces at the ground level. Building A-B will contain 464 units comprised of 34 studios, 280 one-bedroom, and 150 two-bedroom units. The main parking entrance would be from the main drive (less than 300 fee from the site's entrance) with an additional parking entrance from the interior north-south road. The largest courtyard space would feature an 80-foot wide opening to the sky, providing visual interest, space and separation in the structural massing. Approximately 718 parking spaces would be provided within the multi-level at- and above-grade parking structure.

Building C-D would occupy the southeast corner of the site and would contain residential units, resident leasing office, recreational amenity spaces, large interior courtyard and a swimming pool, in a four-story wrap building and be approximately 65 feet tall. Building C-D would contain 300 residential units comprised of 35 studios, 189 one-

bedroom, and 76 two-bedroom units. Approximately 472 parking spaces (including 23 for the restaurant use) would be provided within the multi-level at- and above-grade parking structures. 83 of the provided units (7 studios; 51 1BRs and 25 2BRs) would be age-restricted.

Along with the leasing and amenity spaces, Building C-D features co-working spaces and a 10,000 square-foot restaurant with outdoor dining areas at the corner of the entrance drive and Avalon Boulevard. The outdoor dining areas would adjoin the nearly 23,000-square-foot publicly-accessible park and open spaces directly along Avalon Boulevard, creating enhanced accessible amenity space for the Carson community along a major thoroughfare.

The 45-foot north-south interior road and landscaped parkways would act as a buffer to the townhouse portion of the site while providing for pedestrian circulation and connections to the amenity areas and the pedestrian bridge to the north.

West Neighborhood (Townhomes)

The eastern half of the development would include an approximately 351-unit for-sale townhouse community and provide an appropriate transition to the single-family neighborhoods to the west and south. While accessible through gated access points from the multi-family portion of the development, the main entry would be from Grace Avenue and look toward a sales office and club fitness facility to serve as a focal point for the community and establish visual connectivity and linkage between the two communities. Within the townhome site, walkable paseos are featured with various pedestrian connections, including to the recreation and pool facility. The townhome units are arranged to provide convenient access to the paseos, linear park, and recreational pool area.

The residential townhome buildings consist of five distinct product types, with various floorplans in each building. All townhome structures are three stories and up to 45 feet in height, and nearly all with direct access to an attached two-car garage. Floorplans are one-, two-, three- and four-bedrooms and range from approximately 725 to 1,800 square feet and feature private patios and decks. The design of the interior spaces has a single-family layout and appearance. Stacked Flats are a cross between townhomes and condos, with either a single- or a multiple-story floor plan and either direct access or indirect access via walkway to the attached garage(s). Approximately 812 parking spaces would be provided in private garages and in surface guest stalls. On the exterior, architectural massing and articulation of townhome buildings, particularly the detached models along Grace Avenue frontage, would provide a sensitive transition to the existing single-family homes adjacent to this new community.

Architecture

Alternative 3's architectural concept features a contemporary design with a modern agrarian architectural vocabulary, as illustrated in Figures 2A-B and 3A-C. The aesthetic design goal is to provide a form, proportion, and articulation that relates to similar architectural approaches throughout the urban areas of the City and maintains a clean and streamlined composition conveyed in a contemporary manner. Buildings are designed with architectural projections (i.e. balcony and signage) to provide visual interest. As a whole, the development utilizes a step-down approach, which involves decreasing height towards the external portion of the site to reduce the overall massing along street frontages. Overall, the mixed-use buildings are intended to create a walkable residential community within an urban context. The development would implement strong vehicular and pedestrian connectivity to respond to the mixed-use nature of the development.

Revised Imperial Avalon Specific Plan

The draft IASP has been slightly modified since circulation of the Draft EIR. Modifications pertain to minor revisions to development standards. Modifications do not result in any substantive changes and would not allow for a greater density or more intensive project that is currently proposed under the Project or any of the alternatives.

Alternative 3 Plans

The revised draft IASP and plan sets for the proposed development under Alternative 3 are available on the City's website at:

https://ci.carson.ca.us/CommunityDevelopment/ImperialAvalon.aspx

Additionally, the following figures provide an overview of the Project's site plan, elevations, and conceptual landscape plan.

- Figure 1: Site Plan
- Figure 2A: Architectural Elevations – Buildings A and B
- Figure 2B: Architectural Elevations – Buildings C and D
- Figure 3A: Conceptual Renderings – Buildings A and B
- Figure 3B: Conceptual Renderings –Attached Townhomes
- Figure 3C: Conceptual Renderings – Detached Townhomes
- Figure 4: Landscape Plan

2.1.3 Discussion of the Environmental Impacts of Alternative 3 and the Project

The environmental impacts of Alternative 3 were discussed within Chapter 6 of the Draft EIR. The Draft EIR concluded that Alternative 3 would not result in new or more severe impacts than the proposed Project. In many cases, Alternative 3 would lessen the magnitude of many of the Project's already less-than-significant impacts.

As with the Project, Alternative 3 would include adoption of a specific plan that is consistent with the development proposed. Notably, Alternative 3 would provide a more gradual and sensitive transition between the higher-density apartment component of the development and the existing single-family residential neighborhood to the west of the Project site across Grace Avenue by placing detached townhome housing that is more consistent with the scale and spacing of the residential neighborhoods immediately adjacent to the area, as compared to the attached, more densely configured, townhomes proposed on the western boundary of the Project's site plan. Table 2 provides a summary of the unit counts and commercial square footage within this alternative as revised since circulation of the Draft EIR, as well as a comparison to the Project.

Table 2. Comparison of Project to Revised Alternative 3

	Project	Revised Alternative 3	Delta vs. Project
Residential Uses			
Apartment			
Apartment units – Non-age restricted	653	681	28
Apartment units – Senior, age-restricted	180	83	(97)
Total Apartment Unit Count	**833**	**764**	**(69)**
Townhome			
Attached townhome units	380	323	(57)
Single-family stand-alone townhome units	0	28	28
Total Townhome Unit Count	**380**	**351**	**(29)**
Total Residential Unit Count	**1,213**	**1,087**	**(126)**
Commercial Uses			
Restaurant Square Footage	10,352	10,000	(352)

Note: ( ) = negative value.

Chapter 6 of the Draft EIR includes a detailed comparison of the environmental impacts of Alternative 3 and the Chapter 6 of the Draft EIR includes a detailed comparison of the environmental impacts of Alternative 3 and the Project. Much of this analysis was based on a comparison between the intensities of the two developments. Because Alternative 3 would result in a less-intense development than the Project, Alternative 3 was found to reduce the magnitude of many of the Project's impacts. Specifically, a trip generation table was prepared to compare the trip generation of the Project and Alternative 3. Given that Alternative 3 has been slightly modified since circulation of the Draft EIR, a new trip generation analysis has been prepared for the revised Alternative 3. This trip generation analysis is included as Attachment A, Revised Alternative 3 Trip Generation Table. As indicated within Attachment A, the revised Alternative 3 would result in development that generates fewer net trips than both the Project and Alternative 3 as originally presented in the Draft EIR. Thus, it stands to follow that the operational environmental effects of the revised Alternative 3 would be the same or of a slightly lesser magnitude than the environmental effects of the original Alternative 3. Notably, the revised Alternative 3 would not eliminate the Project's sole significant and unavoidable short-term construction noise impact, despite implementation of mitigation. However, it would still reduce the magnitude of many of the Project's already less-than-significant impacts.

3 CEQA Findings Regarding Recirculation

As discussed in Section 1 of this Errata, the information contained herein merely clarifies, amplifies, or makes insignificant modifications in the Final EIR. New information added to the Final EIR is not "significant", and recirculation of the Draft EIR is not required (see CEQA Guidelines Section 15088.5).

The relevant portions of CEQA Guidelines Section 15088.5 read as follows:

a) A lead agency is required to recirculate an EIR when significant new information is added to the EIR after public notice is given of the availability of the draft EIR for public review under Section 15087 but before certification. As used in this section, the term "information" can include changes in the project or environmental setting as well as additional data or other information. New information added to an EIR is not "significant" unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project's proponents have declined to implement. "Significant new information" requiring recirculation include, for example, a disclosure showing that:

    1) A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.

    2) A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.

    3) A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the significant environmental impacts of the project, but the project's proponents decline to adopt it.

    4) The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded. (Mountain Lion Coalition v. Fish & Game Com.(1989) 214 Cal.App.3d 1043).

b) Recirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR.

The information contained herein is not “significant new information” for the following reasons:

- Alternative 3 would not result in a new significant environmental impact. No new mitigation measures have been proposed or brought to the City’s attention that would result in a new significant environmental impact.
- Alternative 3 would not result in a substantial increase in the severity of an environmental impact.
- Alternative 3 is an alternative that was previously considered within the Draft EIR and the Project’s proponents have ***accepted*** its adoption. Thus, the Project’s proponents have not declined to adopt a new project alternative or mitigation measure considerably different from others previously analyzed that would clearly lessen the significant environmental impacts of the Project.
- The Draft EIR was not found to be so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.

Thus, the City has reviewed the information in this Errata and has determined that it does not change any of the findings or conclusions of the Final EIR and does not constitute “significant new information” pursuant to CEQA Guidelines Section 15088.5.

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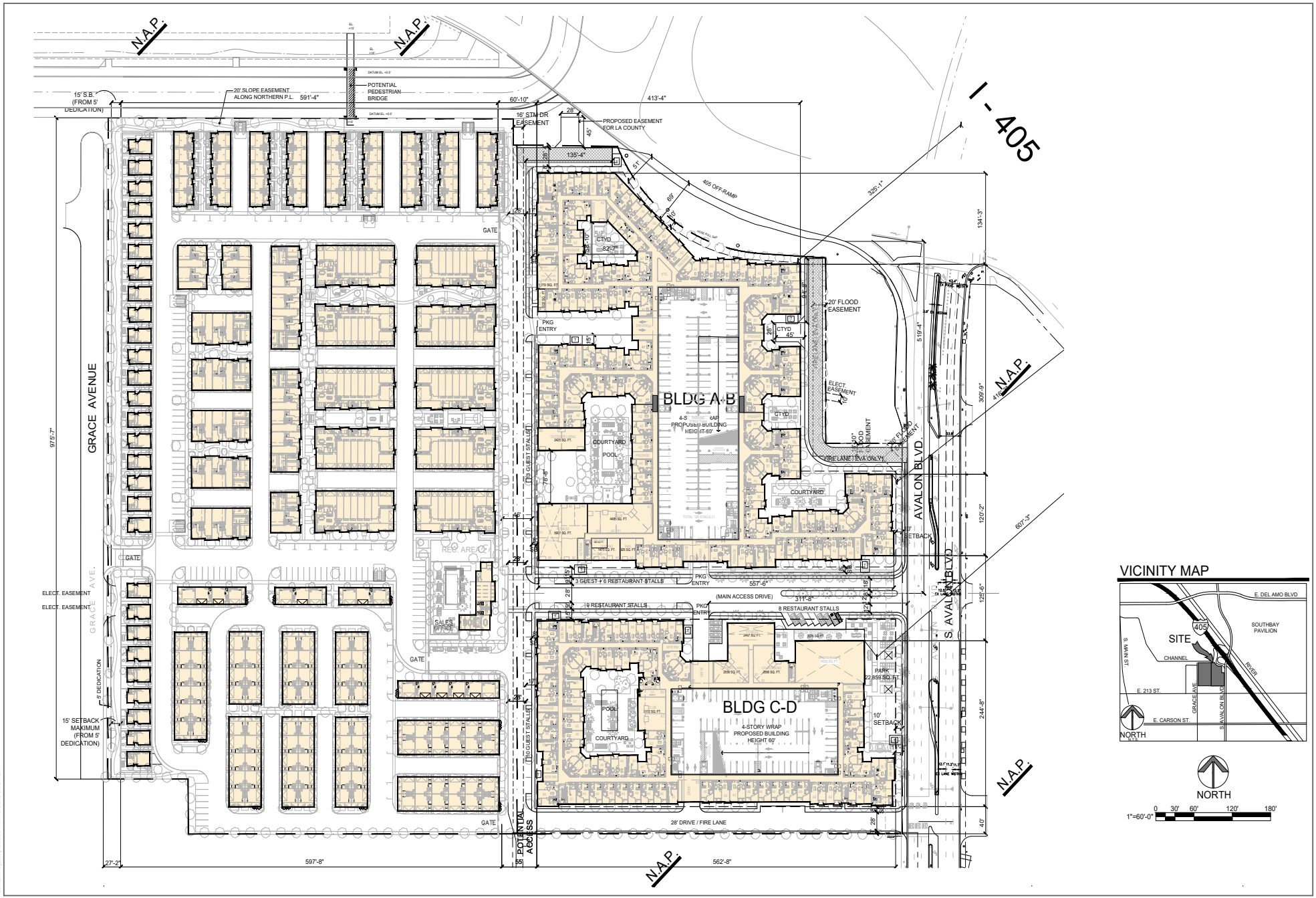

Source: AO, 2022

FIGURE 1

Site Plan

Imperial Avalon Mixed-Use Project

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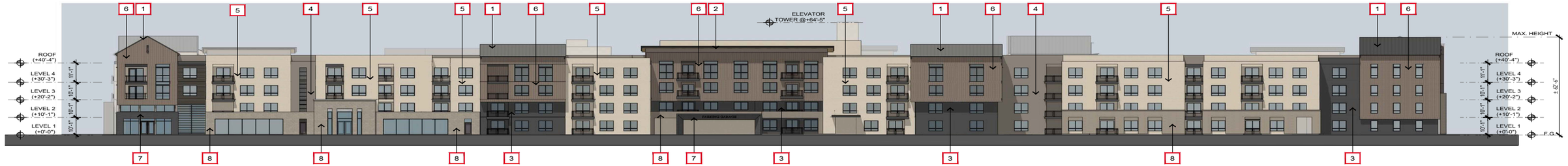
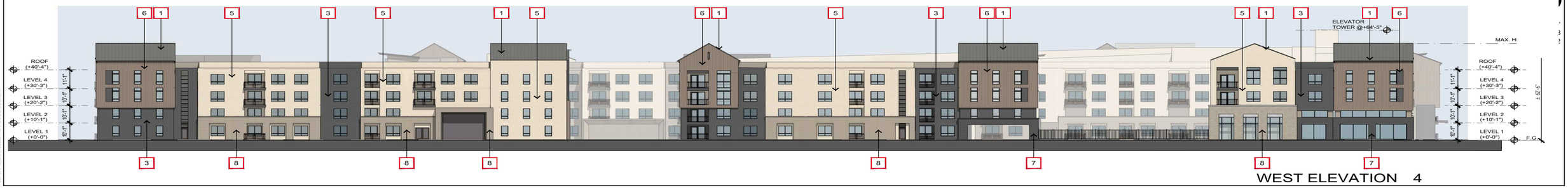
NORTH ELEVATION 1



EAST ELEVATION 2



SOUTH ELEVATION 3



WEST ELEVATION 4

SOURCE: AO, 2022

FIGURE 2A

Architectural Elevations – Buildings A and B

Imperial Avalon Mixed-Use Project

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NORTH ELEVATION 1



EAST ELEVATION 2



SOUTH ELEVATION 3

WEST ELEVATION 4

SOURCE: AO, 2022

FIGURE 2B

Architectural Elevations – Buildings C and D

Imperial Avalon Mixed-Use Project

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S. AVALON VIEW TOWARDS WEST 1



S. AVALON VIEW LOOKING SOUTH WEST 2

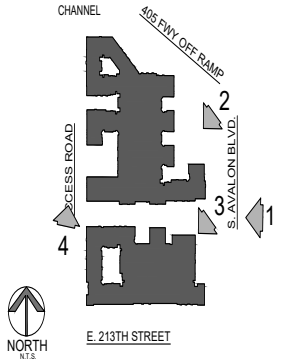


VIEW FROM S. AVALON LOOKING SOUTH WEST / RESTAURANT 3



VIEW FROM ACCESS ROAD LOOKING NORTH EAST 4

KEY MAP



Source: AO, 2022

FIGURE 3A

Conceptual Renderings - Buildings A and B

Imperial Avalon Mixed-Use Project

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Source: AO, 2022

FIGURE 3B

Conceptual Renderings – Attached Townhomes

Imperial Avalon Mixed-Use Project

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PLAN 1



PLAN 2

Source: AO, 2022

FIGURE 3C

Conceptual Renderings – Detached Townhomes

Imperial Avalon Mixed-Use Project

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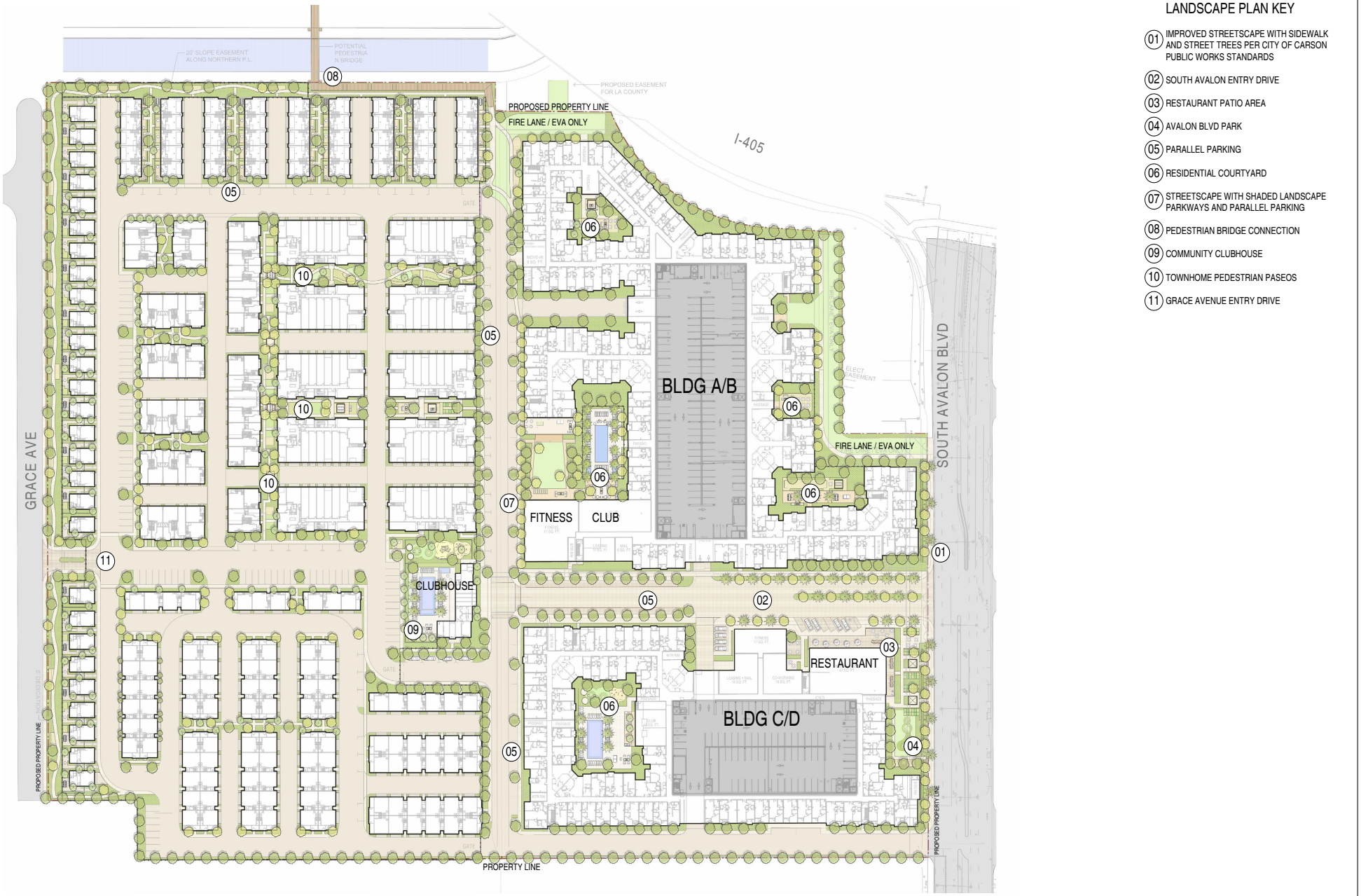

Source: AO, 2022

FIGURE 4

Landscape Plan

Imperial Avalon Mixed-Use Project

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Attachment A

Revised Alternative 3 Trip Generation Table

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IMPERIAL AVALON PROJECT - ALTERNATIVE 3 - REDUCED DENSITY AND SENSITIVE TRANSITION ALTERNATIVE
ESTIMATED PROJECT TRIP GENERATION (11.07.2022)

Land Use	ITE Land Use Code	Size	Trip Generation Rates [a]							Estimated Trip Generation						
				AM Peak Hour			PM Peak Hour				AM Peak Hour Trips			PM Peak Hour Trips		
			Daily	Rate	In%	Out%	Rate	In%	Out%	Daily	In	Out	Total	In	Out	Total
PROPOSED PROJECT																
Multifamily Housing (Mid-Rise)	221	1,032 DU	5.44	0.36	26%	74%	0.44	61%	39%	5,614	97	275	372	277	177	454
Less: Internal capture			*1%*		*0%*	*0%*		*2%*	*5%*	*(56)*	*0*	*0*	*0*	*(6)*	*(9)*	*(15)*
Less: Walk/Bike/Transit Credit [b]			*0%*	*0%*			*0%*			*0*	*0*	*0*	*0*	*0*	*0*	*0*
Net External Vehicle Trips										5,558	97	275	372	271	168	439
Single-Family Detached Housing	210	28 DU	9.44	0.74	25%	75%	0.99	63%	37%	264	5	16	21	18	10	28
Less: Internal capture			*0%*		*0%*	*0%*		*0%*	*0%*	*0*	*0*	*0*	*0*	*0*	*0*	*0*
Less: Walk/Bike/Transit Credit [b]			*0%*	*0%*			*0%*			*0*	*0*	*0*	*0*	*0*	*0*	*0*
Net External Vehicle Trips										264	5	16	21	18	10	28
Quality Restaurant	931	10 KSF	83.84	0.73	55%	45%	7.8	67%	33%	838	4	3	7	52	26	78
Less: Internal capture			*11%*		*14%*	*0%*		*14%*	*18%*	*(92)*	*(1)*	*0*	*(1)*	*(7)*	*(5)*	*(12)*
Less: Walk/Bike/Transit Credit [b]			*0%*	*0%*			*0%*			*0*	*0*	*0*	*0*	*0*	*0*	*0*
Total Driveway Trips										746	3	3	6	45	21	66
Less: Pass-by			*43%*	*43%*			*43%*			*(321)*	*(1)*	*(1)*	*(2)*	*(19)*	*(9)*	*(28)*
Net External Vehicle Trips										425	2	2	4	26	12	38
Senior Adult Housing - Attached	252	83 DU	3.85	0.2	35%	65%	0.26	55%	45%	320	6	11	17	12	10	22
Less: Internal capture			*0%*		*0%*	*0%*		*0%*	*0%*	*0*	*0*	*0*	*0*	*0*	*0*	*0*
Less: Walk/Bike/Transit Credit [b]			*0%*	*0%*			*0%*			*0*	*0*	*0*	*0*	*0*	*0*	*0*
Net External Vehicle Trips										320	6	11	17	12	10	22
TOTAL DRIVEWAY TRIPS										6,888	111	305	416	346	209	555
TOTAL PROJECT EXTERNAL VEHICLE TRIPS										6,567	110	304	414	327	200	527
EXISTING USE CREDIT																
Mobile Home Park	-	225 DU	-	-	-	-	-	-	-	1,141	25	49	74	49	38	87
	-		-	-	-	-	-	-	-	-	-	-	-	-	-	-
	-		-	-	-	-	-	-	-	-	-	-	-	-	-	-
TOTAL EXISTING DRIVEWAY TRIPS [d]										1,141	25	49	74	49	38	87
NET INCREMENTAL EXTERNAL TRIPS										5,426	85	255	340	278	162	440

Notes:

[a] Source: Institute of Transportation Engineers (ITE), *Trip Generation, 10th Edition* , 2017 and NCHRP 8-51, Internal Trip Capture Estimation Tool, Texas Transportation Institute.

[b] A 0% Walk/Bike/Transit Credit was used based on the site's general suburban context.

[c] ITE use 933 - Fast-Food Restaurant without Drive-Through Window used for daily rate due to lack of daily rate data for ITE use 936 - Coffee/Donut Shop without Drive-Through Window.

[d] 24-hour counts were taken at existing driveways at the proposed Project site in lieu of using estimated existing trips from ITE Trip Generation.

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