

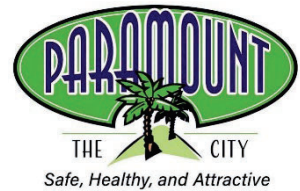
## Appendix B EIR NOP and NOP Comment Letters

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Organization	Name and Title	Address	Suite, Floor, or P.	City and Zip Code
Paramount Unified School District	Dr. Joshua Lightle, Superintendent	15110 California Street		Paramount, CA 90723
Los Angeles County Sanitation Districts	Board of Directors	1955 Workman Mill Rd.		Whittier, CA 90607
South Coast Air Quality Management District, Intergovernnr	Attn: Sam Wang, Program Supervisor	21865 E. Copley Drive		Diamond Bar, CA 91765
Southern California Association of Governments		818 W. Seventh St., 12 <sup>th</sup> Floor		Los Angeles, CA 90017
L.A. County Dept. of Public Works	Attn: Environmental Programs	900 S. Fremont Ave.		Alhambra, CA 91803
Los Angeles County Fire Protection District		1320 Eastern Avenue		Los Angeles, CA 90063
City of Downey	Irma Huitron, Director of Community Development	11111 Brookshire Avenue		Downey, CA 90241
City of Long Beach	Christopher Koontz, Development Services Department Directo	411 W. Ocean Boulevard	3rd Floor	Long Beach, CA 90802
City of Compton	Cecil Flournoy, Director of Community Development	205 S. Willowbrook		Compton, CA 90220
City of Bellflower	Elizabeth Oba, Director of Planning and Building Services	16600 Civic Center Dr.		Bellflower, CA 90706
City of Lynwood	Gabriel Linares, Director of Community Development	11330 Bullis Road		Lynwood, CA 90262
City of South Gate	Meredith Elguira, Community Development Director	8650 California Avenue		South Gate, CA 90280
Los Angeles County Metropolitan Transportation Authority	Development Review Team	One Gateway Plaza		Los Angeles, CA 90012 – 2952
Los Angeles County Department of Public Health	Barbara Ferrer, PhD, Director	5050 Commerce Drive		Baldwin Park, CA 91706
Department of Transportation	District 7	100 South Main Street		Los Angeles, California 90012
Southern California Gas Company	Andy Carrasco, Local Government and Community Affairs	1801 S. Atlantic Blvd.	PO BOX 1626	Monterey Park, CA 91756
County of Los Angeles, Department of Regional Planning	Amy Bodek, Director of Regional Planning	320 West Temple Street		Los Angeles, California 90012
Metropolitan Water District of Southern California	Brandon Goshi, Interim Group Manager, Water Resources Management	700 Alameda St		Los Angeles, California 90012
Southern California Edison Company	Land Use/Environmental Coordinator	2131 Walnut Grove Avenue		Rosemead, CA 91770
Central Basin Municipal Water District	Alejandro Rojas, General Manager	6252 Telegraph Road		Commerce, CA 90040
Fair Housing Foundation	Stella Verdeja, Executive Director	3605 Long Beach Blvd	Ste 302	Long Beach, CA 90807
Kingdom Causes Bellflower	Andrew San Nicolas, Executive Director	16429 Bellflower Blvd		Bellflower, CA 90706
Gateway Cities Council of Governments	Hector De La Torre, Executive Director	16401 Paramount Blvd		Paramount, CA 90723
Su Casa	Alberto Uribe, Executive Director	3750 E Anaheim St	Suite 100	Long Beach, CA 90804
Paramount Care Foundation	Mike McKown, Project Hope Director	8303 Alondra Blvd		Paramount CA 90723
MUSA		<a href="mailto:info@musa18.org">info@musa18.org</a>		

# City of Paramount



16400 Colorado Avenue, Paramount, CA 90723 - (562) 220-2036 – [www.paramountcity.gov](http://www.paramountcity.gov)

## NOTICE OF PREPARATION

**DATE:** January 6, 2025

**TO:** Responsible Agencies, Trustee Agencies, and Interested Parties

**FROM:** City of Paramount Planning Department  
John King, Interim Planning Director  
16400 Colorado Avenue  
Paramount, CA 90723

**SUBJECT:** Notice of Preparation of a Draft Program Environmental Impact Report (PEIR) for the City of Paramount Clearwater Specific Plan Pursuant to Title 14, California Code of Regulations, California Environmental Quality Act (CEQA) Guidelines, Sections 15082(a), 15103, and 15375.

**PROJECT APPLICANT:** City of Paramount

**NOTICE IS HEREBY GIVEN** that the City of Paramount (City), as Lead Agency, has determined, in accordance with California Environmental Quality Act (CEQA) Guidelines Section 15160 that an EIR is required for the proposed project to comply with CEQA. The City has further determined that in accordance with CEQA Guidelines Section 15168, the EIR should be a Program EIR (PEIR) since the project will be implemented in stages over time. Because the City determined an EIR is clearly required in accordance with CEQA Guidelines 15060(d), an initial study has not been prepared.

We are interested in your agency's views as to the appropriate scope and content of the PEIR's environmental information relevant to your agency's statutory responsibilities related to the project. Please include the name of a contact person for your agency in your response. For interested individuals, we would like to be informed of environmental topics or issues that you believe should be included in the PEIR. The proposed project, its location, and its probable environmental effects are described below. The City welcomes public input during the Notice of Preparation (NOP) review period. Pursuant to Public Resources Code Section 21092 and CEQA Guidelines Section 15082, your response must be sent not later than 30 days after your receipt of this notice. If no response is received by the end of the review period, the City will presume that you have no response.

**NOTICE OF PREPARATION REVIEW PERIOD:** January 7, 2025 to February 6, 2025

Please send your comments to:

Attn: John King, Interim Planning Director  
City of Paramount Planning Department  
16400 Colorado Avenue  
Paramount, California 90723  
(562) 220-2036  
[jking@paramountcity.com](mailto:jking@paramountcity.com)



**SCOPING MEETING:**

Pursuant to CEQA Guidelines Section 15082(c) (Notice of Preparation and Determination of Scope of EIR), the City will conduct a scoping meeting for the purpose of soliciting comments of adjacent cities, responsible agencies, trustee agencies, and interested parties requesting notice as to the appropriate scope and content of the Draft PEIR.

The purpose of the meeting is to present the project and environmental topics in a public setting and provide an opportunity for the City to hear from the community and interested agencies on what potential environmental issues are important to them. The meeting will include a brief presentation of the proposed project, the EIR process, and the topics to be analyzed in the EIR. Following the presentation, interested agencies, organizations, and members of the public will be encouraged to offer their views concerning what environmental issues should be included in the PEIR.

The Public Scoping Meeting will be held on the following date/time and location:

Thursday, January 16, 2025 at 5:30 PM  
City of Paramount Council Chamber  
City Hall  
16400 Colorado Avenue  
Paramount, California 90723

To allow for mailing, receipt, and 30-day review of this NOP, the comment period closes at 5 PM on February 6, 2025.



John King, Interim Planning Director

1/2/25  
Date

## **PROJECT LOCATION:**

Regionally, the project site is located in the City of Paramount in Los Angeles County. Paramount is situated in the southern portion of Los Angeles County, approximately 10.5 miles southwest of the City of Los Angeles (see Figure 1, Regional Context Map). Regional access to Paramount is provided by Interstate 105 (I-105), Interstate 605 (I-605), State Route 91 (SR-91), and Interstate 710 (I-710). Paramount is located in the Gateway Cities area and is bordered by the City of Downey and City of South Gate to the north, the City of Bellflower to the east, the City of Long Beach to the south, and the Cities of Compton and Lynwood and the unincorporated community of East Rancho Dominguez to the west (see Figure 2, Project Vicinity Map). Locally, the Clearwater Specific Plan area ("Planning Area") is located in the north-central portion of the City and is bound by Rosecrans Avenue on the north, Paramount Boulevard on the east, Somerset Boulevard on the south, and a Union Pacific Railroad, San Pedro Subdivision, rail line on the west (see Figure 3, Specific Plan Boundary Map).

## **EXISTING CONDITIONS:**

The Planning Area encompasses approximately 71 acres and consists of a fully developed "superblock" within a fully urbanized area (see Figure 4, Planning Area Existing Uses Map). The Planning Area is characterized by private land ownership, with the Bianchi family being the largest landowner with a contiguous area that includes the Bianchi Theatres and Paramount Swap Meet and a majority of the northern half of the Planning Area, as well as a parcel in the southwest corner of the Planning Area that contains a retail/warehouse building and associated parking. The parking in this area is used as overflow parking for the Swap Meet. Communications Workers of America (CWA) Local 9400 owns a small parcel with a single building in the northern portion of the Planning Area along Rosecrans Avenue. A shopping center is located in the northeastern portion of the Planning Area. A triangular shaped Southern California Edison easement is located in the northeastern portion of the Planning Area adjacent to the shopping center at the corner of Rosecrans Avenue and Paramount Boulevard. The Paramount Adult School is located in the east-central portion of the Planning Area just north of the Swap Meet at the corner of All America City Way and Paramount Boulevard. The Our Lady of the Rosary Parish is located in the east-central portion of the Planning Area just south of the Swap Meet along Paramount Boulevard. The Somerset Business Park is located in the southeastern portion of the Planning Area at the corner of Paramount Boulevard and Somerset Boulevard and is comprised of multiple parcels combined to form a business park with multiple buildings; the buildings include multiple tenants, which are owned condominium style. One of the tenants is the Paramount Sheriff's Substation. There is an automobile storage and shipping yard owned by HoneyBee International located in the west-central portion of the Planning Area just south of the Swap Meet and west of the Our Lady of the Rosary Parish. There are multiple parcels located along the western edge of the Planning Area owned by the Port of Long Beach (formerly owned by Union Pacific Railroad) and containing the San Pedro Subdivision rail line. Finally, the Planning Area currently does not contain any housing other than church quarters.

The site has access to three major streets that act as boundaries of the Planning Area. The streets are Rosecrans Avenue to the north, Paramount Boulevard to the east, and Somerset Boulevard to the south. A Union Pacific rail line right-of-way acts as the western boundary of the Planning Area. Currently, it is estimated that there are approximately 2,946 passenger vehicle parking stalls located throughout the Planning Area, including 88 ADA spaces. Table 1 (Existing Land Use) lists the existing land uses within the Planning Area as of 2023, and indicates the use(s), number of acres, and square footage.

**Table 1: Existing Land Use**

<b>Current Use</b>	<b>Land Use Equivalent</b>	<b>Acres</b>	<b>Square Footage</b>
Movie Theater	Commercial	4.1	47,840
CWA Local 9400	Commercial	1.2	10,023
Strip Mall/Shopping Center	Commercial	2.5	40,843
Swap Meet and Drive-In (Concession Building)	Commercial	1.2	13,426
Swap Meet (Vendor Area)	Commercial	10	486,574
Swap Meet Parking	Commercial	23.1	0
Retail/Warehouse	Commercial	6.5	14,446
HoneyBee International	Industrial	6.6	86,714
Paramount Adult School	Quasi-Public	3.3	41,870
Our Lady of the Rosary	Quasi-Public	4.4	49,841
Somerset Business Park	Business Park/Office	6.3	140,386
Paramount Sheriff Substation	Public Facility	1.5	14,049
SCE Easement	Utility/Easement	0.3	0
<b>Total</b>		<b>71.0</b>	<b>946,012</b>
Note: Land Use Equivalent provides a common, general land use category based on the specific use.			

The surrounding area is characterized primarily by a mix of commercial, industrial, quasi-public, and institutional land uses as well as parks and recreation facilities. Immediately north of the Planning Area across Rosecrans Avenue is a railway right-of-way, which is currently being identified as the Southeast Gateway Line corridor, LA Metro's upcoming light rail transit line from Southeast Los Angeles County to Downtown Los Angeles. To the east of the Planning Area are Paramount Park and Paramount Park Community Center, the Paramount Park Middle School, Paramount High School (West) Campus, and residential neighborhoods. To the west of the Planning Area are warehouse, logistics, light industrial, and commercial uses developed under the Clearwater West Specific Plan. South of the Planning Area is a mix of industrial, commercial, and residential uses.

## **PROJECT CHARACTERISTICS:**

The proposed Specific Plan identifies the long-term vision and objectives for private development and public improvements, including creation of a new street grid, within the Planning Area. The proposed Specific Plan includes the following components:

- Chapter 1: Introduction
- Chapter 2: Vision
- Chapter 3: Land Use Plan
- Chapter 4: Design and Development Standards
- Chapter 5: Mobility Plan
- Chapter 6: Infrastructure Plan
- Chapter 7: Implementation Plan

The proposed Specific Plan establishes land use, transportation, infrastructure, economic development, and urban design strategies to promote a vibrant, inclusive, and pedestrian-oriented neighborhood center. The Planning Area is envisioned as a dynamic live-work-play hub for residents and visitors. The proposed Specific Plan includes a mixed-use district that would provide retail, entertainment, housing, and open space amenities for local residents. The proposed

Specific Plan would also provide for an artisanal manufacturing and creative live/work district that includes industrial uses along with residential uses.

### **Private Realm Strategies**

The proposed Specific Plan includes five land use zones: Mixed-Use Town Center, Town Residential, Flex District, Quasi-Public, and Neo-Industrial. The Specific Plan sets development maximums and height limits for the five development zones. Below is a description of the five proposed development zones. Figure 5 (Specific Plan Development Zones) depicts the proposed zoning districts.

- The purpose of the **Mixed-Use Town Center (MU-TC)** zoning district is to promote a concentration of transit-oriented development best practices within the Specific Plan area that responds to the adjacent light rail station. This zone would accommodate the highest density of development allowed within the Specific Plan area that would encourage vertical mixed-use prioritizing housing above ground-level commercial uses. It would serve as the gateway between the City of Paramount and regional transit access.
- The **Town Residential-65 (TR-65)** zoning district will emphasize development of housing with community serving ground-floor uses to create a pleasant, walkable neighborhood. It would promote multiple, medium-density, multi-unit residential housing projects that establish a traditional urban block pattern.
- The **Town Residential-40 (TR-40)** zoning district will promote the same uses as the TR-65 district but at a lower density. Envisioned to include townhome, garden apartment, and other “missing middle” housing typologies. Limited ground-floor commercial or community uses would be allowed, such as live/work spaces and small, local coffee shops, dry cleaners, etc.
- The **Flex District (FD)** zoning district is intended to be a complementary mix of residential, commercial, and neo industrial uses. It provides for diverse land uses that promote a 24/7 live, work, play district; flexible building standards; and emphasis on healthy, sustainable performance standards. It allows for the continued operation of existing commercial and office uses while allowing for the evolution of the area into a denser mix of uses.
- The **Quasi-Public (QP)** zoning district is already in the City General Plan. This zone is used to note continued use of the Paramount Adult School and Our Lady of the Rosary Church. If residential development is proposed, as accessory/infill or as demolition and new development, the TR-40 standards would apply.
- The **Neo Industrial (NI)** zoning district will provide a model for neo-industrial development that complements the scale and character of neighborhood residential areas while providing a buffer from existing nonresidential uses outside the Specific Plan area. This zone encourages forward-thinking approaches to land uses, ongoing operations, and building design to promote mixed-use, multi-story non-residential buildings.

The proposed Specific Plan update allows flexibility between a variety of residential, commercial, office, and neo (light) industrial uses across the entire Specific Plan Area. Overall, the Specific Plan is limited to a maximum of 2,000 housing units, which represents approximately 30 dwelling units per acre (du/ac) over the entire Specific Plan Area. Development of the Specific Plan Area is anticipated to be phased over a 20-year, or longer, period, through individual buildings/sites. Rather than creating a consistent 30 du/ac over the entire Specific Plan Area, individual buildings will be able to be developed through nondiscretionary approval if all the objective design and development standards are met. Each development zone includes the following key development standards informing building envelope size and density:

- Mixed-Use Town Center
  - 3.0 FAR

- 90 du/ac
  - Maximum height: 85 feet
- Town Residential - 65
  - 2.5 FAR
  - 65 du/ac
  - Maximum height: 65 feet
- Town Residential – 40
  - 2.0 FAR
  - 40 du/ac
  - Maximum height: 50 feet
- Flex District
  - 2.0 FAR
  - 40 du/ac
  - Maximum height: 50 feet
- Quasi-Public
  - 2.0 FAR
  - 40 du/ac
  - Maximum height: 50 feet
- Neo Industrial
  - No residential allowed
  - 1.5 FAR
  - Maximum height: 40 feet

Square footage for structured parking areas (i.e., at-grade, subterranean, and/or above grade) is excluded from FAR. The proposed Specific Plan also includes development and design standards which are established to:

- Encourage the development of mixed-use structures with ground-floor retail and entertainment uses with residential above.
- Enhance investment and development potential through higher-intensity development while respecting the area's physical form and eclectic, creative character
- Emphasize flexibility, creativity, and innovation to attract desired uses
- Differentiate between the smaller scale block-and-lot patterns of the western portion of the district and the larger scale block-and-lot patterns of the eastern portion to conserve opportunities for a variety of business types and maintain the sense of district authenticity
- Address parking needs while limiting the proliferation of surface lots and maintain parking regulations that allow for better site design and maximum site utility
- Identify standards and guidelines for onsite open space and encourage the retention and/or development of offsite open spaces that serve the Clearwater District
- Foster streetscape and landscape amenities that allow for small-scale, informal gathering, both within sites and along public rights-of-way, especially sidewalks, street corners
- Develop more accessible and street-side public open space. Buildings fronting public sidewalks, and specifically buildings fronting Rosecrans Avenue, should provide sidewalk-oriented entries and small-scale gathering opportunities
- Anticipate and facilitate emerging sidewalk and pedestrian activity, as well as ensure access to all transit modes through project designs, orientation, and spaces
- Add public gather spaces: courtyards, public/town square, and small parks.
- Encourage active and passive environmental design strategies that conserve natural resources



### **Public Realm Strategies**

The proposed Specific Plan includes public realm improvement strategies which establish street standards and guidelines to ensure long-term provision of pedestrian-oriented sidewalks, landscape amenities, and active transportation infrastructure that encourages walking and biking, and maximization of curbside parking resources throughout Clearwater. Ensuring adequate sidewalks and basic streetscape facilities is a key Specific Plan objective.

**Arterial Roadways.** Improvements to the three arterial streets surrounding the project area to the north, east, and south, respectively, are likely to occur along with private redevelopment. Minimal changes to these boulevards are proposed while existing land use conditions remain in place. Based upon private redevelopment a range of improvements would be proposed:

- Update pedestrian facilities at intersections to increase safety such as new crosswalk legs, high-visibility crosswalks, and new alignment for crosswalk geometries
- Potential widening of sidewalks on private parcel areas through setbacks and/or dedications
- Updated signal timing
- New signalized intersections and/or mid-block crossings
- Dedicated bicycle crossings across Rosecrans Avenue
- New right-in, right-out vehicle entrances into the Planning Area

**Internal Access and Mobility.** Upon redevelopment, new circulation patterns within the Specific Plan area would be established to connect new developments to the local street network, which will replace current surface parking lot circulation routes (see Figure 6, Specific Plan Mobility Concept). The intent of the new circulation patterns would be a traditional urban block structure defined by pedestrian-oriented streets. These streets are envisioned as a creative space that merges the boundary between sidewalk and street to provide a common public space shared by pedestrians, cyclists and low-speed vehicles. Such streets, sometimes called “living streets,” are pedestrian-oriented travel ways. New streets would range in facility types including with or without bike lanes, sidewalk width, parkway width, center medians, curbside management, and number of travel lanes. All streets are proposed to include curb extensions and mid-block crossings and intersections, a minimum of eight-foot-wide sidewalks (excluding parkway), and planted parkways that are bioswales or flow-through planters. The maximum number of lanes would be three lanes (one travel lane in each direction and a center turn lane). Additionally, the streets would be designed to encourage slow speeds with features such as raised intersections and curbsless street design.

**Bikeways.** The proposed Specific Plan includes a multi-use path with a designated bikeway along the western edge of the Planning Area from Somerset Boulevard to Rosecrans Avenue adjacent to the Union Pacific railway line. This multi-use path would provide direct connections to the future Southeast Gateway Station via the planned bike path along the Southern California Edison corridor north of Rosecrans Avenue.

### **Paramount Swap Meet**

The Paramount Swap Meet is currently open 7 days a week. Currently, the Paramount Swap Meet encompasses over 46 acres of the Planning Area (vendor area and parking). The swap meet includes a parking lot with 2,100 parking stalls, over 800 vendor spaces (approximately 500,000 square feet), and employs over 100 full and part-time employees.

Over time, the Paramount Swap Meet is anticipated to be reduced in size as the Planning Area develops. At full buildout, the Specific Plan intends for Swap Meet operations to occur within publicly-accessible open space (e.g., market plaza, parks, etc.) during certain hours and/or days

more akin to a daily farmers market (see Exhibit 3-7, Specific Plan Open Space Concept). Another approach is similar to Friday Food Truck night approach where “on-street” parking stalls within the new roads in the Planning Area would provide the vendor space during certain hours. At the time of full buildout, the proposed Specific Plan would provide for approximately 100,000 square feet of vendor space within the Planning Area, as well as hours of operation that are reduced from the condition today (i.e., less days of the week and/or less hours per day).

Parking for Swap Meet visitors is proposed to be accomplished through mixed-use parking structures throughout the Planning Area, which are associated with new developments. New developments would be required to provide parking for their new uses; there will also be shared parking agreements and/or incentives for developments to provide some additional parking that would serve Swap Meet visitors and/or other public visitors.

### **Development Capacity**

Based on growth projections provided by the Southern California Association of Governments (SCAG), the proposed components of the Clearwater Specific Plan, and an analysis of existing underutilized sites that may redevelop, a development estimate has been forecast through a project horizon year of 2045. Based on a development model according to the proposed development zones, the City estimates that the Specific Plan would support the following development through 2045:

- Total new development of approximately 3 million square feet of residential, retail/restaurant, office, neo industrial, and community facilities
- 2,000 units at approximately 2.0 million square feet
  - 4,600 new residents based on average household size of 2.3 residents per unit
- Retain approximately 50,000-square foot movie theatre
- Retain existing Somerset Business Park
- Retain existing church and adult school; includes development of accessory residential units (approximately 60 townhomes)
- 30,000 square feet for adaptive reuse of light industrial/storage shed into a brewery type facility
- 150,000 square feet new retail/restaurant
- 800,000 square feet new neo industrial and/or office
- Approximately 4,000 off-street parking stalls; 1.3 million square feet structured and surface parking
- New Open Space:
  - 5.5 acres publicly accessible open space
  - 1.75 acres resident/tenant common space
  - 4.5 acres rooftop amenity and/or landscape space
  - 2.5 to 3 acres of ground stormwater/bioswale planting area
- New Streets:
  - Type 1: +/-90 feet right of way, 2 travel lanes, on-street parking, protected bicycle lanes
  - Type 2: +/-80 feet right of way, 2 travel lanes, center left turn lane, on-street parking,
  - Type 3: +/-70 feet right of way, 2 travel lanes, limited on-street parking, protected bicycle lanes
  - Type 4: +/-60 feet right of way, 2 travel lanes, limited on-street parking, wide sidewalks
  - Type 5: 2 lane street with wider lanes to accommodate truck traffic serving neo industrial uses

- Type 6: Woonerf, shared street typology used to access townhomes and provide service/emergency vehicle access to pedestrian areas

Table 2 (Existing and Projected Year 2045 Land Use Intensity) shows the anticipated growth within the Planning Area under the proposed Specific Plan. The majority of development would occur on surface parking lots currently used for the operation and parking of the Paramount Swap Meet. The areas with existing uses that could be demolished and redeveloped total approximately 40,000 square feet of retail and 10,000 square feet of office space at the corner of Rosecrans Avenue and Paramount Boulevard. As a result, proposed Specific Plan would result in a net increase in development within the Planning Area.

**Table 2: Existing and Projected Year 2045 Land Use Intensity**

<b>Land Use Category</b>	<b>Existing Overall Intensity (SF)</b>	<b>2045 Overall Intensity (SF)</b>	<b>Difference (+/-)</b>
Commercial	116,555	230,000	+113,445
Commercial (Swap Meet Stalls)*	486,574	100,000	-386,574
Neo Industrial (Light Manufacturing/R&D)	0	800,000	+800,000
Industrial/Logistics	86,714	0	-86,714
Public Facilities	14,049	14,049	0
Quasi-Public	101,734	101,734	0
Business Park (Office)	140,386	140,386	0
Utility/Easement	0	0	0
<b>Total Nonresidential Building Area</b>	<b>946,012</b>	<b>1,386,169</b>	<b>+440,157</b>
* 486,574 square feet for Swap Meet stalls does not include built (i.e., building) square footage. This represents the use of temporary facilities (i.e., tents) on surface parking lots.			

The development capacity forecast encompasses the entire Specific Plan area because no site-specific, individual development proposals would be approved as part of the proposed Specific Plan Update. Individual site-specific projects would be subject to its own review for compliance with CEQA, and would be evaluated in accordance with Section 151153 (Tiering) of the CEQA Guidelines to determine whether potential project impacts were addressed by this EIR. Table 3 (Existing and Projected Year 2045 Development Capacity Comparison) shows the anticipated net increases in development potential within the Planning Area under the proposed Specific Plan Update. The 2045 planning horizon for the Planning Area is estimated to result in increases of approximately 1 million square feet of non-residential space (excluding square footage for structured parking), 2,000 dwelling units, 4,643 residents, and 138 employees for the 2045 horizon year.

**Table 3: Existing and Projected Year 2045 Development Capacity Comparison**

<b>Development Indicators</b>	<b>EXISTING CONDITIONS (2025)</b>	<b>FUTURE CONDITIONS (2045)</b>	<b>Difference (+/-)</b>
Temporary Vendor Space SF	486,574	100,000	-386,574
Non-Residential Building SF	459,438	1,386,169	+ 926,731
Dwelling Units	0	2,000	+2,000
Population	0	4,643	+4,600
Employees	1,621	1,759	+ 138



### **General Plan Amendment**

A General Plan amendment would be required to add news subzones (Mixed-Use Town Center, Town Residential – 65, Flex District, and Neo Industrial; potentially Town Residential – 40) to allow the proposed increase in development capacity (i.e., heights and allowed densities) and provide consistency with the Specific Plan. In addition to these map changes, the description for “Clearwater Mixed Use” land use designation would be revised to increase the maximum FAR for commercial and industrial development, consistent with the zone districts indicated in the Clearwater Specific Plan amendment. The Clearwater Mixed-Use land use designation would be further revised to remove discussion of allowed residential uses, as new multi-family residential uses will be allowed.

### **INTENDED USE OF THE PEIR:**

The programmatic planning framework proposed in the Specific Plan Update would not result in the immediate construction of any new development nor entitlement of any new, specific project. All new development within the Planning Area would be subject to the City’s permitting, approval, and public participation processes. Elected and appointed officials along with City Staff would review subsequent project applications for consistency with the Specific Plan, and would prepare appropriate environmental documentation to comply with CEQA and other applicable environmental requirements.

Pursuant to Section 15168 of the State CEQA Guidelines, this EIR is a Program EIR as it relates to the Specific Plan Update. The goals, policies, land use designations, implementation programs, and other substantive components of the Specific Plan and implementing sections of the Zoning Ordinance comprise the “program” evaluated in this Program EIR. Subsequent activities undertaken by the City and project proponents to implement the Specific Plan would be examined and would consider this Program EIR to determine the appropriate level of environmental review required under CEQA. Subsequent implementation activities may include but are not limited to the items listed below.

- Rezoning of properties to achieve consistency with the Specific Plan.
- Transfer of development rights within development zones of the Specific Plan area, which do not result in a development of more than 2,000 units across the entire Planning Area.
- Updating and approval of development plans and planning documents, including evaluation of development proposals.
- Review and approval of general plan amendments, specific plans, and zone changes.
- Approval of tentative maps, variances, conditional use permits, and other land use permits and entitlements.
- Approval of development agreements.
- Approval of facility and service master plans and financing plans.
- Approval and funding of public improvement projects.
- Approval of resource management plans.
- Issuance of permits and other approvals needed for implementation of the General Plan.
- Issuance of permits and other approvals needed for public works and private development projects.

### **PEIR SCOPE:**

The City has been determined that the proposed project would require preparation of a PEIR pursuant to CEQA. The PEIR would address the following issues:

**Aesthetics:** The PEIR will describe the aesthetic and urban implications of the proposed project.

**Agriculture and Forestry:** The PEIR will evaluate potential impacts (if any) related to land used or zoned for agriculture or forestry resources.

**Air Quality:** The PEIR will describe the potential short- and long-term impacts of the proposed project on local and regional air quality based on methodologies defined by the South Coast Air Quality Management District (SCAQMD).

**Biological Resources:** The PEIR will evaluate potential impacts on biological resources resulting from development of the proposed project including potential impacts to wetlands, interference with migratory birds, and consistency with biological resources policies and ordinances.

**Cultural and Historic Resources:** The PEIR will describe any potential impacts and mitigation needs associated with historic and cultural (archaeological) resources.

**Energy:** The PEIR will evaluate inefficient or unnecessary consumption of energy resources or conflicts that obstruct a State or local plan for renewable energy or energy efficiency.

**Geology and Soils:** The PEIR will describe the potential geotechnical implications of development of the proposed project including nearby fault lines.

**Greenhouse Gas Emissions and Global Climate Change:** The PEIR will describe the potential impacts on local greenhouse gas emissions and global climate change using the latest approach and methodologies recommended by State and regional agencies.

**Hazards and Hazardous Materials:** The PEIR will describe the potential for hazardous material use or hazardous waste investigation and clean-up activities anticipated from the proposed project and will describe any associated potential impacts.

**Hydrology and Water Quality:** The PEIR will evaluate potential impacts on hydrology and water quality resulting from the proposed project including the onsite stormwater drainage channel.

**Land Use and Planning:** The PEIR will describe the potential effects of the proposed project on existing and planned land use characteristics in the project vicinity.

**Mineral Resources:** The PEIR will evaluate whether the project will result in the loss of availability of a known mineral resource or a local mineral resource recovery area.

**Noise:** The PEIR will describe the potential onsite and offsite noise impacts resulting from implementation of the proposed project.

**Population and Housing:** The PEIR will describe potential impacts on the City's existing and future housing supply.

**Public Services:** The PEIR will describe the potential impacts on public services (police and fire protection, parks and recreation, and schools).

**Transportation:** The PEIR will describe the transportation and circulation implications of the proposed project, including its incremental contribution to daily and peak hour traffic on local and regional roadways. The evaluation will include roadway system impacts, transit implications,

effects on pedestrian and bicycle circulation related to general plan consistency. Vehicles Miles Travelled (VMT) will also be analyzed.

**Tribal Cultural Resources:** The PEIR will describe potential impacts to Native American resources.

**Utilities and Service Systems:** The PEIR will describe potential impacts associated with the proposed project including water supply, water, wastewater treatment, and solid waste and recycling.

**Wildfire:** The PEIR will describe potential increase in exposure/risk to wildfires.

**Alternatives:** Pursuant to CEQA Guidelines Section 15126.6, the Draft PEIR will identify and compare a reasonable range of alternatives to the Project.

## **REQUIRED APPROVALS:**

As the Lead Agency, the City also intends this EIR to serve as the CEQA-required environmental documentation for consideration by other Responsible Agencies and Trustee Agencies that may have limited discretionary authority over future projects affected by the Specific Plan. Following certification of this Program EIR and adoption of the Specific Plan by the lead agency (City of Paramount), other agencies may use this Program EIR in the approval of subsequent implementation activities. These agencies may include but are not limited to those listed below.

### **Local Agencies**

- City of Compton
- City of Lynwood
- City of Long Beach
- City of Bellflower
- City of South Gate
- City of Downey
- County of Los Angeles
- Gateway Cities Council of Governments

### **Regional and State Agencies**

- Los Angeles County Local Agency Formation Commission (LAFCO)
- Los Angeles County Flood Control and Water Conservation District
- Los Angeles County Metropolitan Transportation Authority
- Los Angeles County Sanitation Districts
- Southern California Association of Governments (SCAG)
- California Department of Fish and Wildlife
- California Department of Conservation
- California Department of Housing and Community Development (HCD)
- California Department of Transportation (Caltrans)
- California Department of Toxic Substance Control
- Regional Water Quality Control Board, Los Angeles Region
- South Coast Air Quality Management District

### **Federal Agencies**

- U.S. Fish and Wildlife Services

- U.S. Army Corps of Engineers

#### **PUBLIC CIRCULATION AND REVIEW:**

After the Draft PEIR has been completed, it will be available for review and comment during a 45-day public review period. Notice of the availability of the Draft PEIR will be released at a later date and will also be available on the City's website. Following that, a Final PEIR will be prepared that includes responses to all comments received during the public review period. Following the release of the Final PEIR, the Planning Commission will hold a public hearing on the PEIR and the proposed project.

#### **Questions**

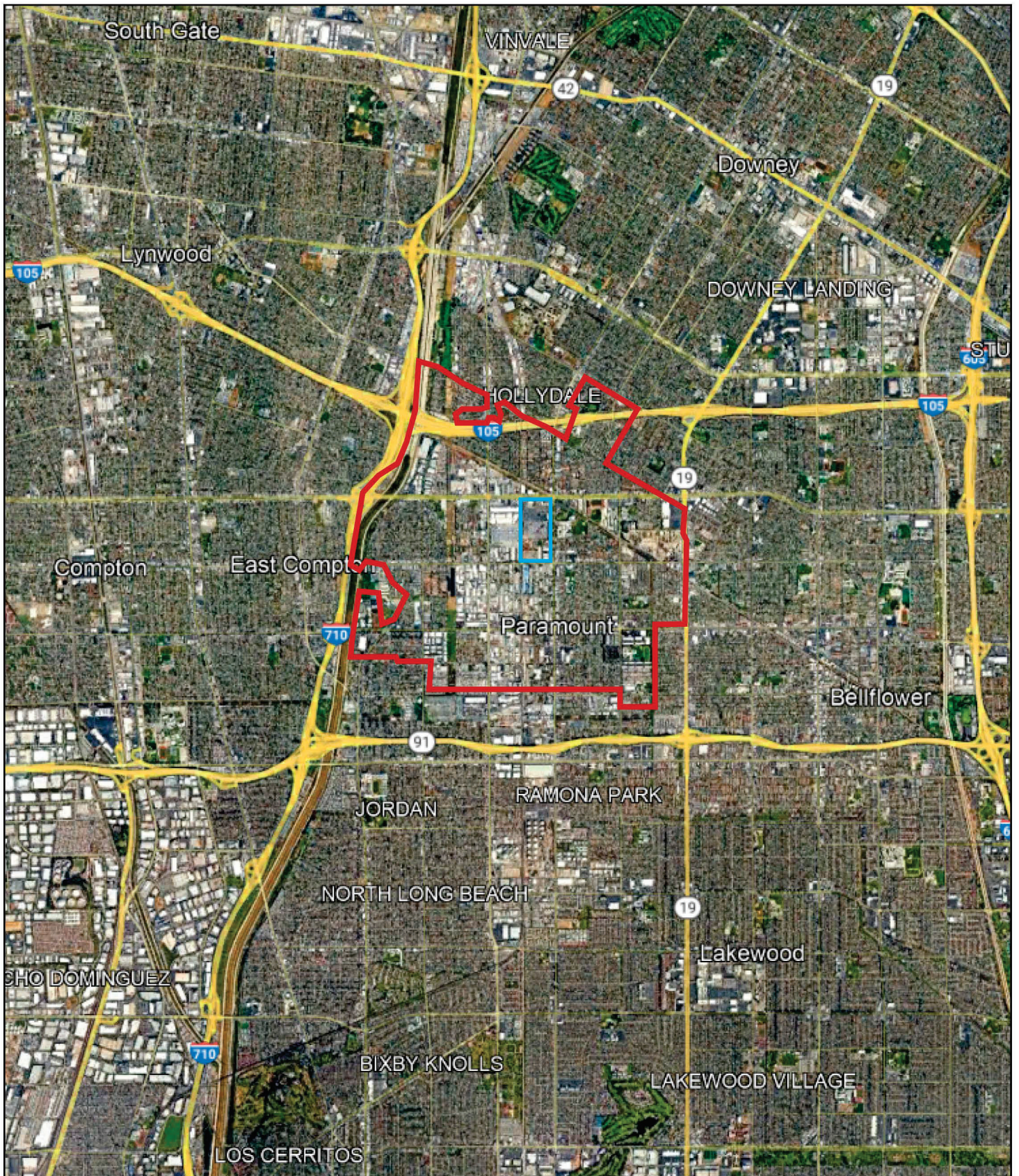
Please contact John King, Interim Planning Director, at [jking@paramountcity.com](mailto:jking@paramountcity.com) or (562) 220-2036 for information about the proposed project or if you have any questions regarding this notice.





# Clearwater Specific Plan Paramount, California





- City of Paramount Boundary



- Specific Plan Boundary

Source: Google Earth  
<http://www.migcom.com> • 951-787-9222

**Figure 2 Project Vicinity Map**

Clearwater Specific Plan  
 Paramount, California







 - Specific Plan Boundary

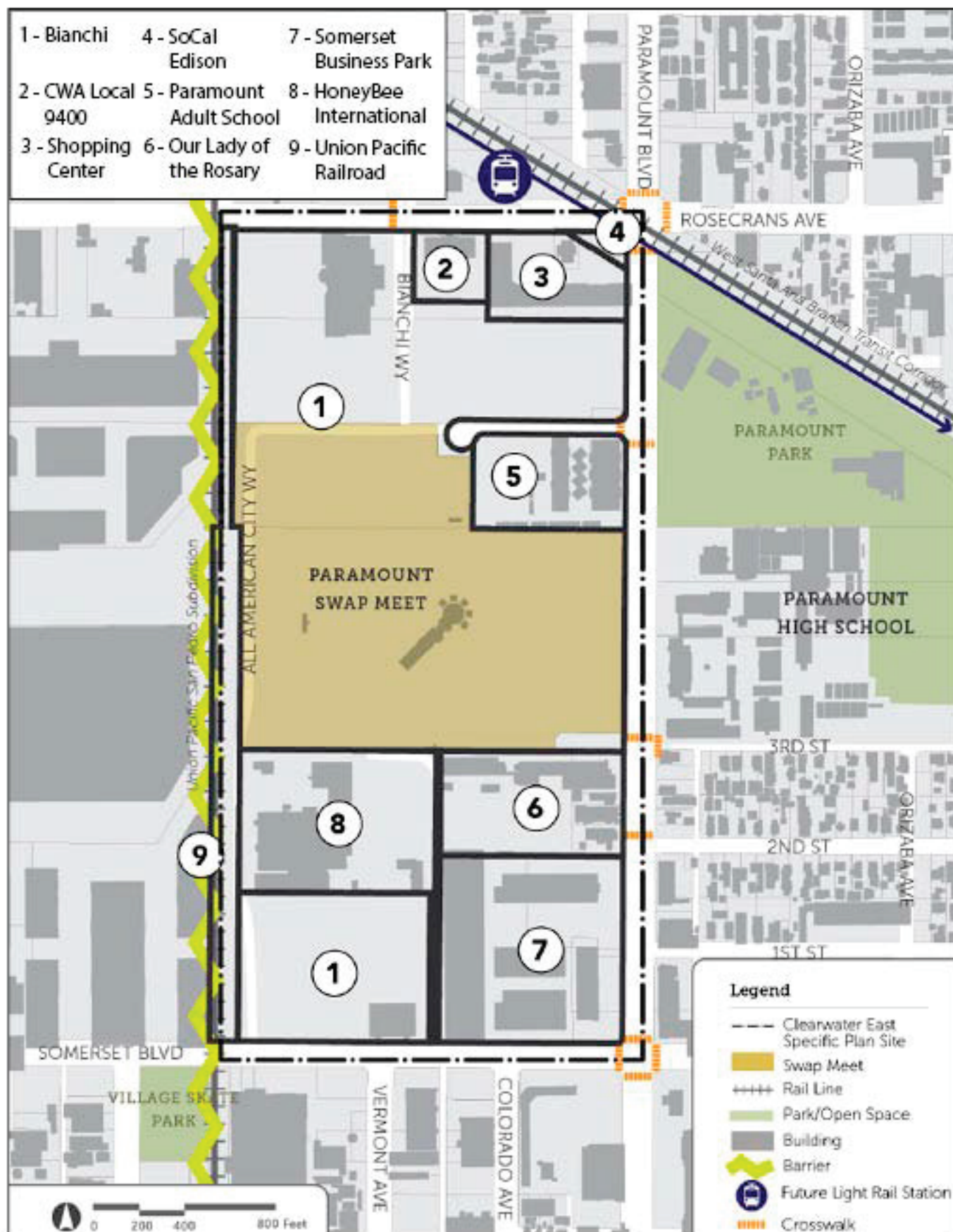
Source: Google Earth  
<http://www.migcom.com> • 951-787-9222

Figure 3 Specific Plan Boundary Map

Clearwater Specific Plan  
 Paramount, California







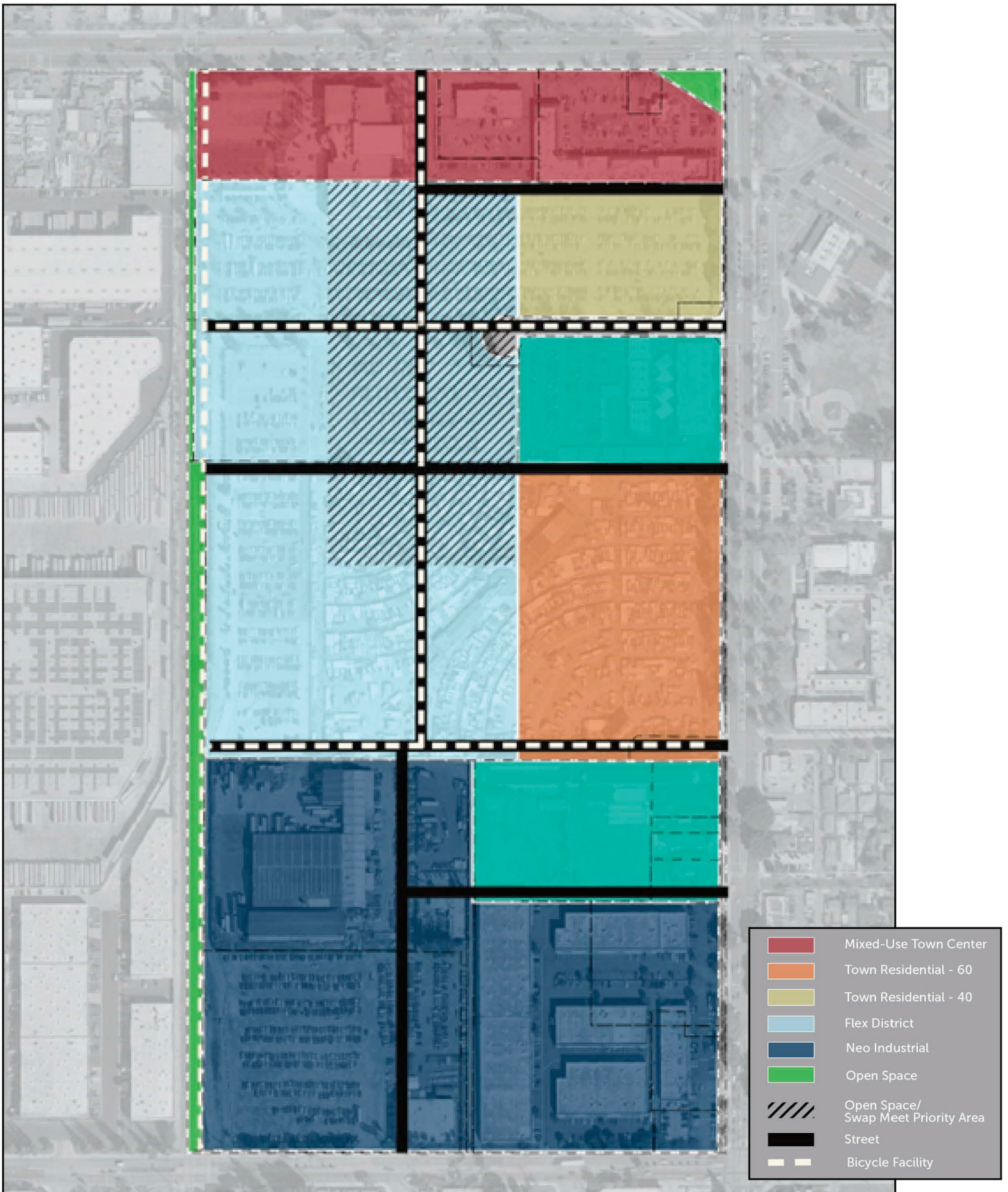
Source: Existing Conditions Report  
<http://www.mig.com> • 951-787-9222

Figure 4 Planning Area Existing Uses Map

Clearwater Specific Plan  
 Paramount, California





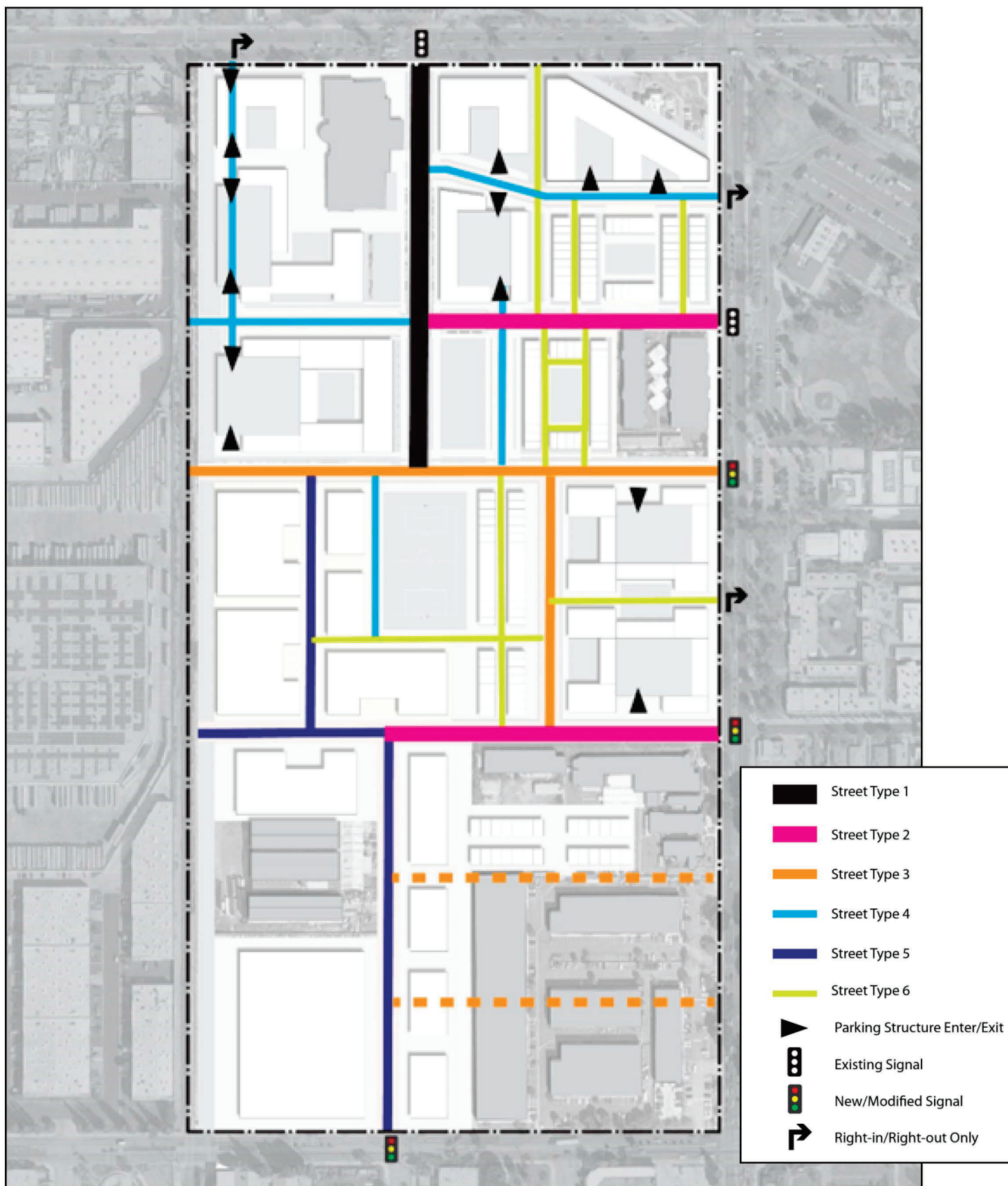


Source: City of Paramount  
<http://www.migcom.com> • 951-787-9222

Figure 5 Specific Plan Development Zones



Clearwater Specific Plan  
 Paramount, California

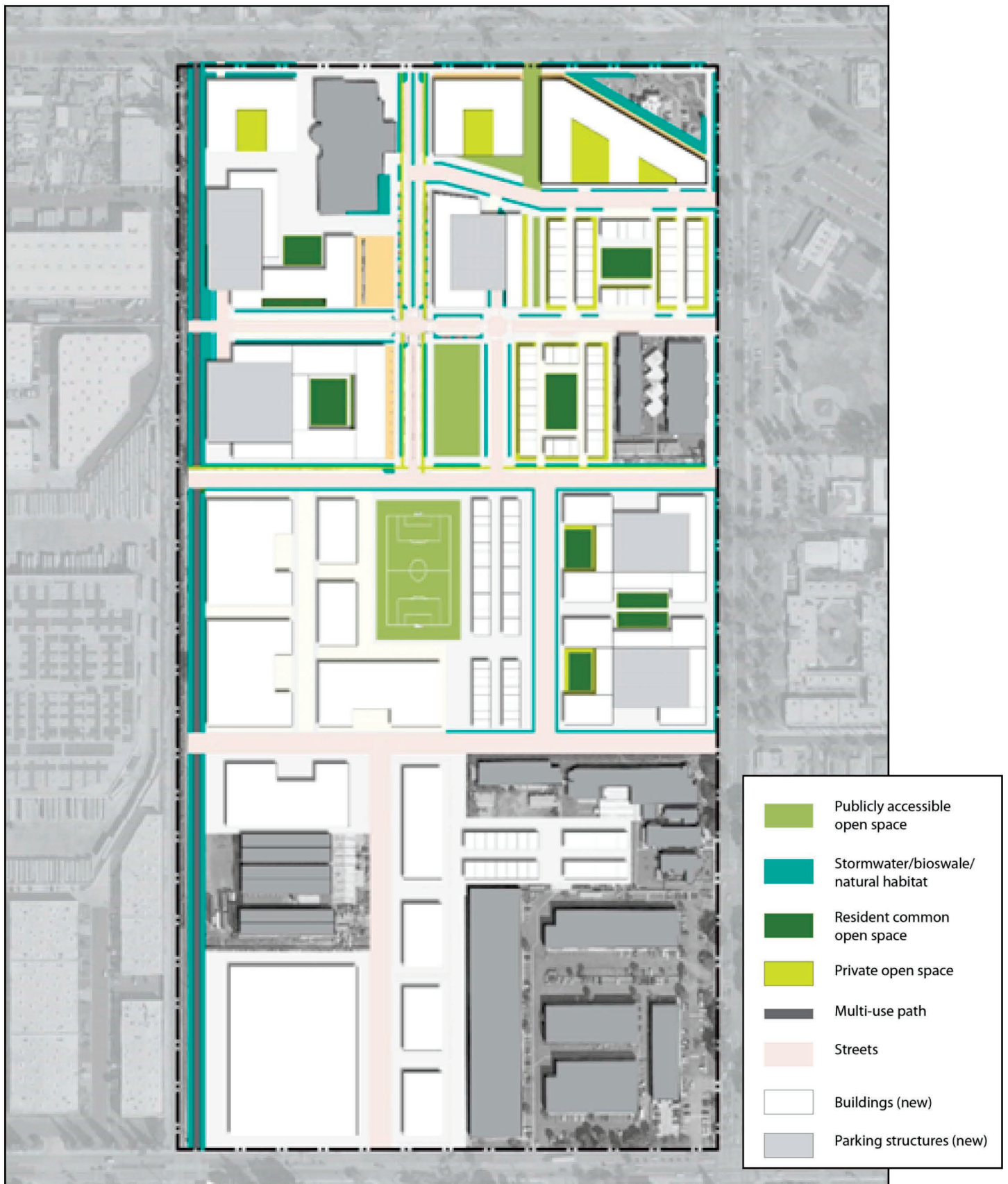


Source: City of Paramount  
<http://www.migcom.com> • 951-787-9222

Figure 6 Specific Plan Mobility Concept

Clearwater Specific Plan  
 Paramount, California





Source: City of Paramount  
<http://www.migcom.com> • 951-787-9222

Figure 7 Specific Plan Open Space Concept

Clearwater Specific Plan  
 Paramount, California





**LOS ANGELES COUNTY  
SANITATION DISTRICTS**  
*Converting Waste Into Resources*

**Robert C. Ferrante**

Chief Engineer and General Manager

1955 Workman Mill Road, Whittier, CA 90601-1400  
Mailing Address: P.O. Box 4998, Whittier, CA 90607-4998  
(562) 699-7411 • [www.lacsd.org](http://www.lacsd.org)

January 29, 2025

Ref. DOC 7402510

VIA EMAIL [jking@paramountcity.com](mailto:jking@paramountcity.com)

Mr. John King, Interim Planning Director  
City of Paramount Planning Department  
16400 Colorado Avenue  
Paramount, CA 90723

Dear Mr. King:

**NOP Response to Clearwater Specific Plan**

The Los Angeles County Sanitation Districts (Districts) received a Notice of Preparation (NOP) of a Draft Program Environmental Impact Report (DPEIR) for the subject project located in the City of Paramount on January 8, 2025. The proposed project is located within the jurisdictional boundaries of District No. 2. We offer the following comments regarding sewerage service:

1. The project proponent is advised that the subject project is located less than half a mile from the District's Ruther Avenue Pumping Plant, located at 8042 Century Boulevard in the City of Paramount, a publicly owned wastewater lift station that serves the local community.
2. Details for any future individual developments within the City should be submitted to the Districts for review to determine whether or not sufficient trunk sewer capacity exists to serve each development and if Districts' facilities will be affected by the development. This is accomplished through the Districts' Will Serve Program. Information for which can be found on our website at [Will Serve Program](#).
3. Individual developments associated with the proposed project may require a Districts' Industrial Wastewater Discharge permit. Project developers should contact the Districts' Industrial Waste Section at (562) 908-4288, extension 2900, to reach a determination on this matter. If this permit is necessary, project developers will be required to forward copies of final plans and supporting information for the proposed project to the Districts for review and approval before beginning project construction. Additional information for which can be found on our website at [Industrial Wastewater Discharge Permits](#).
4. The wastewater flow originating from the proposed project will discharge to a local sewer line, which is not maintained by the Districts, for conveyance to the Districts' 24-inch diameter Arthur Avenue Trunk Sewer, located in Rosecrans Avenue, east of Union Pacific Railroad. This trunk sewer has a capacity of 6.6 million gallons per day (mgd) and conveyed a peak flow of 1.8 mgd when last measured in 2016.
5. The wastewater generated by the proposed project will be treated at the A.K. Warren Water Resource Facility (formerly known as the Joint Water Pollution Control Plant) located in the City of Carson, which has a capacity of 400 mgd and currently processes an average flow of 248.3 mgd.
6. The expected increase in average wastewater flow from the project, described in the NOP as 2,000 residential units, 150,000 square feet (sf) of restaurant, and 800,000 sf of office building, is 830,000 gallons per day, after all structures on the project site are demolished. A copy of the Districts' average wastewater generation factors is available on our website at [Table 1, Loadings for Each Class of Land Use](#).

7. The Districts are empowered by the California Health and Safety Code to charge a fee to connect facilities (directly or indirectly) to the Districts' Sewerage System or to increase the strength or quantity of wastewater discharged from connected facilities. This connection fee is used by the Districts for its capital facilities. Payment of a connection fee may be required before future individual development is permitted to discharge to the Districts' Sewerage System. For more information and a copy of the Connection Fee Information Sheet, go to [www.lacsd.org](http://www.lacsd.org), under Services, then Wastewater (Sewage) and select Rates & Fees. In determining the impact to the Sewerage System and applicable connection fees, the Districts will determine the user category (e.g. Condominium, Single Family Home, etc.) that best represents the actual or anticipated use of the parcel(s) or facilities on the parcel(s) in the development. For more specific information regarding the connection fee application procedure and fees, please contact the Districts' Wastewater Fee Public Counter at (562) 908-4288, extension 2727. If an Industrial Wastewater Discharge Permit is required, connection fee charges will be determined by the Industrial Waste Section.
8. In order for the Districts to conform to the requirements of the Federal Clean Air Act (CAA), the capacities of the Districts' wastewater treatment facilities are based on the regional growth forecast adopted by the Southern California Association of Governments (SCAG). Specific policies included in the development of the SCAG regional growth forecast are incorporated into clean air plans, which are prepared by the South Coast and Antelope Valley Air Quality Management Districts in order to improve air quality in the South Coast and Mojave Desert Air Basins as mandated by the CAA. All expansions of Districts' facilities must be sized and service phased in a manner that will be consistent with the SCAG regional growth forecast for the counties of Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial. The available capacity of the Districts' treatment facilities will, therefore, be limited to levels associated with the approved growth identified by SCAG. As such, this letter does not constitute a guarantee of wastewater service but is to advise the City that the Districts intend to provide this service up to the levels that are legally permitted and to inform the City of the currently existing capacity and any proposed expansion of the Districts' facilities.

If you have any questions, please contact the undersigned at (562) 908-4288, extension 2742, or [phorsley@lacsd.org](mailto:phorsley@lacsd.org).

Very truly yours,

*Patricia Horsley*

Patricia Horsley  
Environmental Planner  
Facilities Planning Department

PLH:plh



State of California – Natural Resources Agency  
DEPARTMENT OF FISH AND WILDLIFE  
South Coast Region  
3883 Ruffin Road  
San Diego, CA 92123  
[wildlife.ca.gov](http://wildlife.ca.gov)

**GAVIN NEWSOM, Governor**  
**CHARLTON H. BONHAM, Director**



February 3, 2025

John King  
City of Paramount  
16400 Colorado Avenue  
Paramount, CA 90723  
[jking@paramountcity.com](mailto:jking@paramountcity.com)

**SUBJECT: NOTICE OF PREPARATION OF A DRAFT PROGRAM  
ENVIRONMENTAL IMPACT REPORT FOR THE CLEARWATER SPECIFIC  
PLAN PROJECT, SCH NO. 2025010201, LOS ANGELES COUNTY, CA**

Dear John King:

The California Department of Fish and Wildlife (CDFW) reviewed the Notice of Preparation (NOP) of a Program Environmental Impact Report (PEIR) from the City of Paramount (City) for the Clearwater Specific Plan (Project) pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines<sup>1</sup>.

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, CDFW appreciates the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

**CDFW ROLE**

CDFW is California's Trustee Agency for fish and wildlife resources and holds those resources in trust by statute for all the people of the State (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a)). CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species (Fish & G. Code, § 1802). Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources.

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<sup>1</sup> CEQA is codified in the California Public Resources Code in section 21000 et seq. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000.

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CDFW may also act as a Responsible Agency under CEQA. (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381). CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code. As proposed, for example, the Project may be subject to CDFW's lake and streambed alteration regulatory authority (Fish & G. Code, § 1600 et seq.). Likewise, to the extent implementation of the Project as proposed may result in "take" as defined by State law<sup>2</sup> of any species protected under the California Endangered Species Act (CESA; Fish & G. Code, § 2050 et seq.) or the Native Plant Protection Act (NPPA; Fish & G. Code, §1900 et seq.), the Project proponent may seek related take authorization as provided by the Fish and Game Code.

## PROJECT DESCRIPTION SUMMARY

### **Proponent:** City

**Objective:** The objective of the Project is to implement the Clearwater Specific Plan which outlines the long-term vision and objectives for private development and public improvements within the Project area. Primary Project activities include the creation of a new street grid and new development, and approximately three million square feet of residential, retail, restaurant, office, industrial, and community facilities. Additionally, parking stalls, structured and surface parking, new streets, and open space areas would be created. More specifically, pedestrian facilities, sidewalks, bicycle crossings, and new circulation patterns would be implemented. Individual site-specific projects would be subject to CEQA review.

**Location:** The Project area encompasses approximately 71 acres located in Paramount, in Los Angeles County. The Project area is fully developed and urbanized. Commercial, industrial, quasi-public, and industrial lands surround the Project area in the north, west, and south. Residential and commercial development, Paramount Park Elementary School, and Paramount Park occur in the east. A Union Pacific rail line right-of-way acts as the western boundary of the Project area. The streets that surround the Project area are Rosencrans Avenue to the north, Paramount Boulevard to the east, and Somerset Boulevard to the south.

**Timeframe:** The City anticipates that development of the Project would occur in 2025 through 2045.

**Biological Setting:** The City did not prepare an Initial Study, and no biological surveys were provided. No special status species were observed through the California Natural Diversity Database (CNDDB) within a mile radius. Additionally, the closest waterway is the Los Angeles River located over a mile west.

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<sup>2</sup> "Take" is defined in Section 86 of the Fish and Game Code as "hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill."

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## COMMENTS AND RECOMMENDATIONS

CDFW offers the comments and recommendations below to assist the City in adequately identifying and/or mitigating the Project's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources.

### General Comments

- 1) Disclosure. The PEIR should provide an adequate, complete, and detailed disclosure about the effects which a proposed project is likely to have on the environment (Pub. Resources Code, § 20161; CEQA Guidelines, § 15151). Such disclosure is necessary so CDFW may provide comments on the adequacy of proposed avoidance, minimization, or mitigation measures, as well as assess the significance of the specific impact relative to plant and wildlife species impacted (e.g., current range, distribution, population trends, and connectivity).
- 2) Project Description and Alternatives. To enable adequate review and comment on the proposed Project from the standpoint of the protection of fish, wildlife, and plants, CDFW recommends the following information be included in the PEIR.
  - a. A complete discussion of the purpose and need for, and description of the proposed Project.
  - b. A range of feasible alternatives to the Project location to avoid or otherwise minimize direct and indirect impacts on sensitive biological resources and wildlife movement areas. CDFW recommends the City select Project designs and alternatives that would avoid or otherwise minimize direct and indirect impacts on biological resources. CDFW also recommends the City consider establishing appropriate setbacks from sensitive and special status biological resources. Setbacks should not be impacted by ground disturbance or hydrological changes from any future Project-related construction, activities, maintenance, and development. As a general rule, CDFW recommends reducing or clustering a development footprint to retain unobstructed spaces for vegetation and wildlife and provide connections for wildlife between properties and minimize obstacles to open space.
  - c. Project alternatives should be thoroughly evaluated, even if an alternative would impede, to some degree, the attainment of the Project objectives or would be more costly (CEQA Guidelines, § 15126.6). The PEIR shall include sufficient information about each alternative to allow meaningful evaluation, public participation, analysis, and comparison with the proposed Project (CEQA Guidelines, § 15126.6).
  - d. Where the Project may impact aquatic and riparian resources, CDFW recommends the City select Project designs and alternatives that would fully avoid impacts to such resources. CDFW also recommends an alternative that



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would not impede, alter, or otherwise modify existing surface flow, watercourse and meander, and water-dependent ecosystems and natural communities. Project designs should consider elevated crossings to avoid channelizing or narrowing of watercourses. Any modifications to a river, creek, or stream may cause or magnify upstream bank erosion, channel incision, and drop in water level, which may cause the watercourse to alter its course of flow.

- 3) Biological Baseline Assessment. An adequate biological resources assessment should provide a complete assessment and impact analysis of the flora and fauna within and adjacent to the Project site and where the Project may result in ground disturbance. The assessment and analysis should place emphasis on identifying endangered, threatened, rare, and sensitive species; regionally and locally unique species; and sensitive habitats. An impact analysis will aid in determining the Project's potential direct, indirect, and cumulative biological impacts, as well as specific mitigation or avoidance measures necessary to offset those impacts. CDFW also considers impacts to Species of Special Concern (SSC) a significant direct and cumulative adverse effect without implementing appropriate avoidance and/or mitigation measures. The PEIR should include the following information.
  - a. Information on the regional setting that is critical to an assessment of environmental impacts, with special emphasis on resources that are rare or unique to the region (CEQA Guidelines, § 15125(c)). The PEIR should include measures to fully avoid and otherwise protect Sensitive Natural Communities. CDFW considers Sensitive Natural Communities as threatened habitats having both regional and local significance. Natural communities, alliances, and associations with a State-wide rarity ranking of S1, S2, and S3 should be considered sensitive and declining at the local and regional level. These ranks can be obtained by visiting the [Vegetation Classification and Mapping Program - Natural Communities webpage](#)<sup>3</sup>.
  - b. A thorough, recent, floristic-based assessment of special status plants and natural communities following CDFW's [Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities](#)<sup>4</sup>. Botanical field surveys should be comprehensive over the entire Project site, including areas that will be directly or indirectly impacted by the Project. Adjoining properties should also be surveyed where direct or indirect Project effects could occur, such as those from fuel modification, herbicide application, invasive species, and altered hydrology. Botanical field surveys should be conducted in the field at the times of year when plants will be both evident and identifiable. Usually, this is during flowering or fruiting. Botanical field survey visits should be spaced throughout the growing season to accurately determine what plants exist in the Project site. This usually involves multiple

<sup>3</sup> <https://wildlife.ca.gov/Data/VegCAMP/Natural-Communities>

<sup>4</sup> <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=18959&inline>

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visits to the Project site (e.g., in early, mid, and late season) to capture the floristic diversity at a level necessary to determine if special status plants are present.

- c. Floristic alliance- and/or association-based mapping and vegetation impact assessments conducted in the Project site and within adjacent areas. The [Manual of California Vegetation](#)<sup>5</sup>, second edition, (Sawyer, Keeler-Wolf, & Evens, 2009) should also be used to inform this mapping and assessment. Adjoining habitat areas should be included in this assessment where the Project's construction and activities could lead to direct or indirect impacts offsite.
- d. A complete and recent assessment of the biological resources associated with each habitat type in the Project site and within adjacent areas. A full literature review includes but is not limited to CDFW's [California Natural Diversity Database](#)<sup>6</sup>. The CNDDDB should be accessed to obtain current information on any previously reported sensitive species and habitat. An assessment should include a minimum nine-quadrangle search of the CNDDDB to determine a list of species potentially present in the Project site. A nine-quadrangle search should be provided in the Project's CEQA document for adequate disclosure of the Project's potential impact on biological resources.
- e. A complete, recent, assessment of endangered, rare, or threatened species and other sensitive species within the Project site and adjacent areas, including SSC and California Fully Protected Species (Fish & G. Code, §§ 3511, 4700, 5050, and 5515). Species to be addressed should include all those which meet the CEQA definition of endangered, rare, or threatened species (CEQA Guidelines, § 15380). Seasonal variations in use of the Project site should also be addressed such as wintering, roosting, nesting, and foraging habitat. Focused species-specific surveys, conducted at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable, may be required if suitable habitat is present. See [CDFW's Survey and Monitoring Protocols and Guidelines](#)<sup>7</sup> for established survey protocol. Acceptable species-specific survey procedures may be developed in consultation with CDFW and U.S. Fish and Wildlife Service.
- f. A recent wildlife and rare plant survey. A lack of records in the CNDDDB does not mean that rare, threatened, or endangered plants and wildlife do not occur. Field verification for the presence or absence of sensitive species is necessary to provide a complete biological assessment for adequate CEQA review (CEQA Guidelines, § 15003(i)). CDFW generally considers biological field assessments for wildlife to be valid for a one-year period, and assessments for rare plants may be considered valid for a period of up to three years. Some aspects of the

<sup>5</sup> <https://vegetation.cnps.org/>

<sup>6</sup> <https://wildlife.ca.gov/Data/CNDDDB>

<sup>7</sup> <https://wildlife.ca.gov/conservation/survey-protocols>

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proposed Project may warrant periodic updated surveys for certain sensitive taxa, particularly if Project implementation build out could occur over a protracted time frame or in phases.

- 4) Direct and Indirect Impacts on Biological Resources. The PEIR should provide a thorough discussion of direct and indirect impacts expected to affect biological resources with specific measures to offset such impacts. The PEIR should address the following.
  - a. A discussion of potential impacts from lighting, noise, temporary and permanent human activity, and exotic species, and identification of any mitigation measures. A discussion regarding Project-related indirect impacts on biological resources. These include resources in nearby public lands, open space, adjacent natural habitats, riparian ecosystems, and any designated and/or proposed or existing reserve lands (e.g., preserve lands associated with a Natural Community Conservation Plan (Fish & G. Code, § 2800 et. seq.)).
  - b. A discussion of both the short-term and long-term effects of the Project on species population distribution and concentration, as well as alterations of the ecosystem supporting those species impacted (CEQA Guidelines, § 15126.2(a)).
  - c. Impacts on, and maintenance of, wildlife corridor/movement areas, including access to undisturbed habitats in areas adjacent to the Project, should be fully analyzed and discussed in the PEIR.
  - d. A discussion of post-Project fate of drainage patterns, surface flows, and soil erosion and/or sedimentation in streams and water bodies. The discussion should also address the potential water extraction activities and the potential resulting impacts on habitat supported by the groundwater. Measures to mitigate such impacts should be included.
  - e. An analysis of impacts from proposed changes to land use designations and zoning, and existing land use designation and zoning located nearby or adjacent to natural areas that may inadvertently contribute to wildlife-human interactions. A discussion of possible conflicts and mitigation measures to reduce these conflicts should be included in the PEIR.
- 5) Cumulative Impact. Cumulative impacts on biological resources can result from collectively significant projects which are individually insignificant. The Project, when considered collectively with prior, concurrent, and probable future projects, may have a significant cumulative effect on biological resources. The Project may have the potential to substantially reduce the number or restrict the range of endangered, rare, or threatened species. Species that may be impacted by the Project include, but are not limited to, the biological resources described in this letter.

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Accordingly, CDFW recommends the PEIR evaluate the Project's potential cumulative impacts on biological resources. The Project may have a "significant effect on the environment" if the possible effects of the Project are individually limited but cumulatively considerable. "Cumulatively considerable" means that the incremental effects of an individual 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 (Pub. Resources Code, § 21083(b)). The City's conclusions regarding the significance of the Project's cumulative impact should be justified and supported by evidence to make those conclusions. Specifically, if the City concludes that the Project would not result in cumulative impacts on biological resources, the City, "shall identify facts and analysis supporting the Lead Agency's conclusion that the cumulative impact is less than significant" (CEQA Guidelines section § 15130(a)(2)).

- 6) Nesting Birds. To avoid impacts to nesting birds, CDFW recommends that clearing of vegetation occur outside of the peak avian breeding season, which generally runs from February 1 through September 1 (as early as January 1 for some raptors). If Project construction is necessary during the bird breeding season, a qualified biologist with experience in conducting breeding bird surveys should conduct a nesting bird survey within three days prior to work in the area. If an active nest is identified, a buffer shall be established between the construction activities and the nest so that nesting activities are not interrupted. For the given Project site, CDFW generally recommends a 100-foot buffer from common avian species, 300 feet for listed or highly sensitive, and 500 feet for raptors. The buffer should be delineated by temporary fencing and remain in effect as long as construction is occurring. No Project construction shall occur within the fenced nest zone until the young have fledged, are no longer being fed by the parents, have left the nest, and will no longer be impacted by the Project. Reductions in the nest buffer distance may be appropriate depending on the avian species involved, ambient levels of human activity, screening vegetation, or possibly other factors.
- 7) Mitigation Measures. Public agencies have a duty under CEQA to prevent significant, avoidable damage to the environment by requiring changes in a project through the use of feasible alternatives or mitigation measures (CEQA Guidelines, §§ 15002(a)(3), 15021). Pursuant to CEQA Guidelines section 15126.4, an environmental document shall describe feasible measures which could mitigate impacts below a significant level under CEQA. Mitigation measures must be feasible, effective, implementable, and fully enforceable/imposed by the lead agency through permit conditions, agreements, or other legally binding instruments (Pub. Resources Code, § 21081.6(b); CEQA Guidelines, § 15126.4).
  - a. The PEIR should provide mitigation measures that are specific and detailed (i.e., responsible party, timing, specific actions, location) in order for a mitigation measure to be fully enforceable and implemented successfully via a mitigation

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monitoring and/or reporting program (Pub. Resources Code, § 21081.6; CEQA Guidelines, § 15097).

- b. If a proposed mitigation measure would cause one or more significant effects, in addition to impacts caused by the proposed Project, the PEIR should include a discussion of the effects of proposed mitigation measures (CEQA Guidelines, § 15126.4(a)(1)). In that regard, the PEIR should provide an adequate, complete, and detailed disclosure about the Project's proposed mitigation measure(s). Adequate disclosure is necessary so CDFW may assess the potential impacts of proposed mitigation measures.
- 8) Compensatory Mitigation. The PEIR should include compensatory mitigation measures for the Project's significant impacts (direct and/or through habitat modification) to sensitive and special status plants, animals, and habitats. Mitigation measures should emphasize avoidance and minimization of Project-related impacts. For unavoidable impacts, on-site habitat restoration or enhancement should be discussed in detail. If on-site mitigation is not feasible or would not be biologically viable and therefore inadequate to mitigate the loss of biological functions and values, off-site mitigation through habitat creation and/or acquisition and preservation in perpetuity should be addressed. Areas proposed as mitigation lands should be protected in perpetuity with a conservation easement and financial assurance and dedicated to a qualified entity for long-term management and monitoring.
- 9) Long-term Management of Mitigation Lands. For proposed mitigation lands, the PEIR should include measures to protect the targeted habitat values in perpetuity. The mitigation should offset Project-induced qualitative and quantitative losses of biological resources. Issues that should be addressed include (but are not limited to) restrictions on access, proposed land dedications, monitoring and management programs, control of illegal dumping, water pollution, and increased human intrusion. An appropriate endowment should be set aside to provide for long-term management of mitigation lands.
- 10) CESA. CDFW considers adverse impacts to a species protected by CESA to be significant. Take of any endangered, threatened, candidate species, or NPPA-listed plant species that results from the Project is prohibited, except as authorized by state law (Fish & G. Code §§ 2080, 2085; Cal. Code Regs., tit. 14, §786.9). Consequently, if the Project or any Project-related activity will result in take of a species designated as endangered or threatened, or a candidate for listing under CESA, CDFW recommends that the Project proponent seek appropriate take authorization under CESA prior to implementing the Project. Appropriate authorization from CDFW may include an Incidental Take Permit (ITP) or a consistency determination in certain circumstances, among other options (Fish & G. Code, §§ 2080.1, 2081, subds. (b) and (c)). Early consultation is encouraged, as

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significant modification to a Project and mitigation measures may be required to obtain a CESA Permit.

To ensure CDFW will be able to use the City's CEQA document for the issuance of an ITP, the PEIR should address all Project impacts to CESA-listed species and specify a mitigation, monitoring, and reporting program that will meet the requirements of an ITP.

- 11) Translocation/Salvage of Plants and Animal Species. Translocation and transplantation is the process of removing plants and wildlife from one location and permanently moving it to a new location. CDFW generally does not support the use of translocation or transplantation as the primary mitigation strategy for unavoidable impacts to endangered, rare, or threatened plants and animals. These efforts are experimental, and the outcome is unreliable. CDFW has found that permanent preservation and management of habitat capable of supporting these species is often a more effective long-term strategy for conserving plants and animals and their habitats.
- 12) Scientific Collecting Permit. A Scientific Collecting Permit would be necessary if there is a plan to capture and relocate wildlife. Pursuant to the California Code of Regulations, title 14, section 650, qualified biologist(s) must obtain appropriate handling permits to capture, temporarily possess, and relocate wildlife to avoid harm or mortality in connection with Project-related activities. CDFW has the authority to issue permits for the take or possession of wildlife, including mammals; birds, nests, and eggs; reptiles, amphibians, fish, plants; and invertebrates (Fish & G. Code, §§ 1002, 1002.5, 1003). A Scientific Collecting Permit is required to monitor project impacts on wildlife resources, as required by environmental documents, permits, or other legal authorizations; and, to capture, temporarily possess, and relocate wildlife to avoid harm or mortality in connection with otherwise lawful activities (Cal. Code Regs., tit. 14, § 650). For more information, please see CDFW's [Scientific Collecting Permit webpage](#)<sup>8</sup>.
- 13) Lake and Streambed Alteration. CDFW has regulatory authority over activities in streams that will divert or obstruct the natural flow, or change the bed, channel, or bank (which may include associated riparian resources) of any river, stream, or lake or use material from a river, stream, or lake. For any such activities, the Project applicant (or "entity") must provide written notification to CDFW pursuant to section 1600 et seq. of the Fish and Game Code. Based on this notification and other information, CDFW determines whether a Lake and Streambed Alteration Agreement (LSAA) with the applicant is required prior to conducting the proposed activities. CDFW's issuance of a LSAA for a project that is subject to CEQA will require CEQA compliance actions by CDFW as a Responsible Agency. CDFW

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<sup>8</sup> <https://wildlife.ca.gov/Licensing/Scientific-Collecting>

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recommends that the City assess whether notification is appropriate. A Notification package for a LSAA may be obtained by accessing CDFW's [Lake and Streambed Alteration Program website](#)<sup>9</sup>.

- 14) Wetland Resources. CDFW, as described in Fish and Game Code section 703(a), is guided by the [Fish and Game Commission's \(Commission\) policies](#)<sup>10</sup>. Through its Wetlands Resources policy, the Commission "...seek[s] to provide for the protection, preservation, restoration, enhancement, and expansion of wetland habitat in California" (California Fish and Game Commission, 2005). It is the policy of the Commission to strongly discourage development in or conversion of wetlands. It opposes, consistent with its legal authority, any development or conversion that would result in a reduction of wetland acreage or wetland habitat values. To that end, the Commission opposes wetland development proposals unless, at a minimum, project mitigation assures there will be 'no net loss' of either wetland habitat values or acreage. The Commission strongly prefers mitigation which would achieve expansion of wetland acreage and enhancement of wetland habitat values."
- a. The Wetlands Resources policy provides a framework for maintaining wetland resources and establishes mitigation guidance. CDFW encourages avoidance of wetland resources as a primary mitigation measure and discourages the development or type conversion of wetlands to uplands. CDFW encourages activities that would avoid the reduction of wetland acreage, function, or habitat values. Once avoidance and minimization measures have been exhausted, a project should include mitigation measures to assure a "no net loss" of either wetland habitat values, or acreage, for unavoidable impacts to wetland resources. Conversions include, but are not limited to, conversion to subsurface drains, placement of fill or building of structures within the wetland, and channelization or removal of materials from the streambed. All wetlands and watercourses, whether ephemeral, intermittent, or perennial, should be retained and provided with substantial setbacks, which preserve the riparian and aquatic values and functions benefiting local and transient wildlife populations. CDFW recommends mitigation measures to compensate for unavoidable impacts be included in the PEIR and these measures should compensate for the loss of function and value.
- b. The Fish and Game Commission's Water policy guides CDFW on the quantity and quality of the waters of this State that should be apportioned and maintained respectively so as to produce and sustain maximum numbers of fish and wildlife; to provide maximum protection and enhancement of fish and wildlife and their habitat; encourage and support programs to maintain or restore a high quality of the waters of this State; prevent the degradation thereof caused by pollution and

<sup>9</sup> <http://www.wildlife.ca.gov/Conservation/LSA>

<sup>10</sup> <https://fgc.ca.gov/About/Policies/Miscellaneous>



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contamination; and, endeavor to keep as much water as possible open and accessible to the public for the use and enjoyment of fish and wildlife. CDFW recommends avoidance of water practices and structures that use excessive amounts of water, and minimization of impacts that negatively affect water quality, to the extent feasible (Fish & G. Code, § 5650).

- 15) Use of Native Plants and Trees. CDFW recommends the City require the Project Applicant to provide a native plant palette for the Project. The Project's landscaping plan should be disclosed and evaluated in the PEIR for potential impacts on biological resources such as natural communities adjacent to the Project site (e.g., introducing non-native, invasive species). CDFW supports the use of native plants for the Project especially considering the Project's location adjacent to protected open space and natural areas. CDFW strongly recommends avoiding non-native, invasive species for landscaping and restoration, particularly any species listed as 'Moderate' or 'High' by the [California Invasive Plant Council](#)<sup>11</sup> CDFW supports the use of native species found in naturally occurring plant communities within or adjacent to the Project site. In addition, CDFW supports planting species of trees, such as oaks (*Quercus* genus), and understory vegetation (e.g., ground cover, subshrubs, and shrubs) that create habitat and provide a food source for birds. CDFW recommends retaining any standing, dead, or dying tree (snags) where possible because snags provide perching and nesting habitat for birds and raptors. Finally, CDFW supports planting species of vegetation with high insect and pollinator value.

## ENVIRONMENTAL DATA

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations. (Pub. Resources Code, § 21003, subd. (e).) Accordingly, please report any special status species and natural communities detected during Project surveys to the CNDDB. The [CNDDB website](#)<sup>12</sup> provides direction regarding the types of information that should be reported and allows on-line submittal of field survey forms.

In addition, information on special status native plant populations and sensitive natural communities, should be submitted to CDFW's Vegetation Classification and Mapping Program using the [Combined Rapid Assessment and Relevé Form](#)<sup>13</sup>.

The City should ensure data collected for the preparation of the PEIR is properly submitted.

<sup>11</sup> <https://www.cal-ipc.org/plants/inventory/>

<sup>12</sup> <https://wildlife.ca.gov/Data/CNDDB>

<sup>13</sup> <https://wildlife.ca.gov/Data/VegCAMP/Natural-Communities/Submit>



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## FILING FEES


The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the fee is required in order for the underlying project approval to be operative, vested, and final. (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089.)

## CONCLUSION

CDFW appreciates the opportunity to comment on the NOP to assist the City in identifying and mitigating Project impacts on biological resources.

Questions regarding this letter or further coordination should be directed to Joleena De La Fe<sup>14</sup>, Environmental Scientist.

Sincerely,

DocuSigned by:  
  
5991E19EF8094C3...

Victoria Tang  
Environmental Program Manager  
South Coast Region

## ATTACHMENTS

ec: California Department of Fish and Wildlife  
Victoria Tang (CDFW EPM)  
Jennifer Turner (CEQA Supervisor)  
Joleena De La Fe (CEQA staff)

Office of Planning and Research  
[State.Clearinghouse@opr.ca.gov](mailto:State.Clearinghouse@opr.ca.gov)

## REFERENCES

California Department of Fish and Game. (2011). *CNDDDB Data Use Guidelines*.  
Retrieved from  
<https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=27285&inline>

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<sup>14</sup> Phone: (858) 354-3527; Email: [Joleena.delafe@wildlife.ca.gov](mailto:Joleena.delafe@wildlife.ca.gov)

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Sawyer, J. O., Keeler-Wolf, T., & Evens, J. M. (2009). *A Manual of California Vegetation* (Second ed.). Sacramento, CA: California Native Plant Society. Retrieved from

<https://vegetation.cnps.org/>

**DEPARTMENT OF TRANSPORTATION**

DISTRICT 7

100 S. MAIN STREET, MS 16

LOS ANGELES, CA 90012

PHONE (213) 269-1124

FAX (213) 897-1337

TTY 711

www.dot.ca.gov

*Making Conservation  
a California Way of Life*

February 4, 2025

John King, Interim Planning Director  
City of Paramount  
16400 Colorado Avenue  
Paramount, CA 90723

RE: City of Paramount Clearwater  
Specific Plan  
SCH # 2025010201  
Vic. LA-710/PM 14.97, LA-105/PM R14.11  
GTS # LA-2025-04720-NOP

Dear John King:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above-referenced NOP. The proposed Specific Plan identifies the long-term vision and objectives for private development and public improvements, including creation of a new street grid, within the Planning Area. The Specific Plan establishes land use, transportation, infrastructure, economic development, and urban design strategies to promote a vibrant, inclusive, and pedestrian-oriented neighborhood center. The Planning Area is envisioned as a dynamic live-work-play hub for residents and visitors. The Specific Plan includes a mixed-use district that would provide retail, entertainment, housing, and open space amenities for local residents. The Specific Plan would also provide for an artisanal manufacturing and creative live/work district that includes industrial uses along with residential uses. The 2045 planning horizon for the Planning Area is estimated to result in increases of approximately 1 million square feet of non-residential space (excluding square footage for structured parking), 2,000 dwelling units, 4,643 residents, and 138 employees for the 2045 horizon year.

The mission of Caltrans is to provide a safe and reliable transportation network that serves all people and respects the environment. Senate Bill 743 (2013) has codified into CEQA law and mandated that CEQA review of transportation impacts of proposed development be modified by using Vehicle Miles Traveled (VMT) as the primary metric in identifying transportation impacts for all future development projects. You may reference the Governor's Office of Planning and Research (OPR) for more information:

<https://opr.ca.gov/ceqa/#guidelines-updates>

As a reminder, VMT is the standard transportation analysis metric in CEQA for land use projects after July 1, 2020, which is the statewide implementation date.

Caltrans is aware of the challenges that the region faces in identifying viable solutions to alleviating congestion on State and Local facilities. With limited room to expand vehicular capacity, this development should incorporate multi-modal and complete streets transportation elements that will actively promote alternatives to car use and better manage existing parking assets. Prioritizing and allocating space to efficient modes of travel such as bicycling and public transit can allow streets to transport more people in a fixed amount of right-of-way.

Caltrans supports the implementation of complete streets and pedestrian safety measures such as road diets and other traffic calming measures. Please note the Federal Highway Administration (FHWA) recognizes the road diet treatment as a proven safety countermeasure, and the cost of a road diet can be significantly reduced if implemented in tandem with routine street resurfacing. Overall, the environmental report should ensure all modes are served well by planning and development activities. This includes reducing single occupancy vehicle trips, ensuring safety, reducing vehicle miles traveled, supporting accessibility, and reducing greenhouse gas emissions.

We encourage the Lead Agency to evaluate the potential of Transportation Demand Management (TDM) strategies and Intelligent Transportation System (ITS) applications in order to better manage the transportation network, as well as transit service and bicycle or pedestrian connectivity improvements. For additional TDM options, please refer to the Federal Highway Administration's *Integrating Demand Management into the Transportation Planning Process: A Desk Reference* (Chapter 8). This reference is available online at:

<http://ops.fhwa.dot.gov/publications/fhwahop12035/fhwahop12035.pdf>

Also, Caltrans has published the VMT-focused Transportation Impact Study Guide (TISG), dated May 20, 2020 and the Caltrans Interim Land Development and Intergovernmental Review (LD-IGR) Safety Review Practitioners Guidance, prepared in On December 18, 2020. You can review the SB 743 Implementation Resource at the following link:

<https://dot.ca.gov/programs/esta/sb-743/resources/>

We acknowledged that the Program Environmental Impact Report (PEIR) will describe the transportation and circulation implications of the proposed project, including its incremental contribution to daily and peak hour traffic on local and regional roadways. The evaluation will

include roadway system impacts, transit implications, and effects on pedestrian and bicycle circulation related to general plan consistency. Vehicles Miles Travelled (VMT) will also be analyzed.

Based on the size of the project, distance to the State facilities, and potential safety impact from the assigned project trips, the following interchanges could be impacted by the proposed plan/development:

- a. I-710/Rosecrans Avenue
- b. I-710/Alondra Blvd.
- c. I-105/Garfield Avenue
- d. I-105/Paramount Blvd.

For the above State facilities, Caltrans would like to review traffic safety impact analysis (such as queuing analysis) for this development in the California Environmental Quality Act (CEQA) review process using Caltrans guidelines on the State facilities so that, through partnerships and collaboration, California can reach zero fatalities and serious injuries by 2050.

A queuing analysis should be conducted to ensure there are no safety-related impacts. This analysis should evaluate off-ramps to confirm that vehicle queues do not extend onto the mainline, which could compromise freeway safety. Additionally, turning pockets at intersections should be assessed to verify that queue lengths do not exceed available storage capacity, preventing potential spillover that could obstruct through traffic. Existing signal timing should be used for the Existing condition.

If the project is expected to generate pedestrian and/or bicycle activity, a multi-modal conflict analysis should be performed. This analysis should evaluate potential conflicts between various transportation modes, including biking, walking, bus, and transit, to ensure safe and efficient integration of all users within the project area.

The project should incorporate Complete Streets elements to enhance accessibility and safety for all users. These improvements should include ADA-compliant curb ramps, continuous sidewalks, dedicated bike lanes, high-visibility crosswalks, Accessible Pedestrian Signals (APS), and Leading Pedestrian Intervals (LPI) where applicable.

If the project is determined to have significant transportation impacts, appropriate mitigation measures should be implemented. These may include Transportation Demand Management (TDM) strategies to reduce single-occupancy vehicle trips and encourage alternative transportation modes, as well as Transportation System Management (TSM) improvements to optimize traffic flow and enhance the efficiency of existing transportation infrastructure.

John King, Interim Planning Director

February 4, 2025

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If you have any questions, please feel free to contact Mr. Alan Lin the project coordinator at (213) 269-1124 and refer to GTS # LA-2025-04720-NOP.

Sincerely,

A handwritten signature in cursive script that reads "Anthony Higgins".

ANTHONY HIGGINS

Acting LDR Branch Chief

Cc: State Clearinghouse

February 4, 2025

John King  
Interim Planning Director  
City of Paramount Planning Department  
16400 Colorado Avenue  
Paramount, California 90723

Dear Mr. King:

On behalf of the California Air Resources Board (CARB) staff, I am writing in response to the Notice of Preparation (NOP) for the Clearwater Specific Plan Project. CARB supports the State's long-term climate goals by engaging with local jurisdictions and lead agencies as they evaluate the greenhouse gas (GHG) impacts of new development during the California Environmental Quality Act (CEQA) process. Specifically, CARB is interested in encouraging new residential and mixed-use development to demonstrate consistency with the 2022 Scoping Plan for Achieving Carbon Neutrality (2022 Scoping Plan).<sup>1</sup> As noted in Appendix D, Local Actions, of the Scoping Plan (Appendix D), "Local government efforts to reduce greenhouse gas (GHG) emissions within their jurisdiction are critical to achieving the State's long-term climate goals."

The Clearwater Specific Plan Project proposes developing five land-use zones on a fully developed 71-acre site that contains several commercial, public, and industrial uses. The project would allow for a variety of residential, commercial, office, and light industrial uses and would be limited to a maximum of 2,000 housing units. Development of the site is expected to be phased over 20 years or longer.

When assessing GHG impacts in the Environmental Impact Report (EIR) to be prepared for this project, CARB recommends that the evaluation include a robust discussion of the project's consistency with the recommendations in Appendix D. Appendix D identifies three priority areas for local government actions. These areas represent GHG reduction opportunities over which local governments have the most authority, as well as having the highest potential for meaningful GHG reductions. These three priority areas are:

- Reduction in vehicle miles traveled (VMT)
- Transportation electrification
- Building decarbonization

Table 3 of Appendix D recommends a combination of key project attributes that have a demonstrated ability to reduce GHG from residential and mixed-use development in each priority area. CARB suggests that the GHG analysis in the EIR examines the project's

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<sup>1</sup> *2022 Scoping Plan | California Air Resource Board*



implementation of these project attributes. These project attributes promote a broad range of transportation alternatives, compact development patterns, energy efficiency, and incorporate equity and environmental justice. Since the project will occur in a fully urbanized area with access to transit, CARB recommends that the analysis pay special attention to how the project will utilize transit options to reduce VMT and GHG.

In the event that the environmental analysis finds the project's GHG impacts to be significant and unavoidable, CARB recommends that the project's sponsors mitigate those impacts following the mitigation hierarchy in Appendix D. This hierarchy suggests prioritizing on-site design measures to mitigate any GHG impacts. To the extent that the project has not incorporated the attributes in Table 3 of Appendix D, implementing these measures into the project design is a recommended approach for mitigating emissions. After opportunities for on-site mitigation are exhausted, Appendix D recommends off-site GHG-reduction measures in the vicinity of the project, and finally non-local off-site GHG reduction measures. If mitigation is pursued through the purchase of carbon-offset credits, Appendix D recommends prioritizing credits that originate in the same air basin as the project, or if none exist within the air basin, credits that originate in California.

CARB appreciates the opportunity to provide early feedback to the City of Paramount on the upcoming environmental review for the Clearwater Specific Plan project. CARB hopes that this feedback will help the City adequately assess any project-related GHG impacts. Additionally, CARB hopes that the recommendations in Appendix D of the Scoping Plan will be useful as the City works to achieve its climate goals. If you have any questions about this letter or would like to meet with CARB staff, please feel free to contact Pedro Peterson at [Pedro.Peterson@arb.ca.gov](mailto:Pedro.Peterson@arb.ca.gov).

Sincerely,

*Annalisa Schilla*

Annalisa Schilla, Assistant Division Chief, Sustainable Transportation and Communities Division

[Annalisa.Schilla@arb.ca.gov](mailto:Annalisa.Schilla@arb.ca.gov)

cc: Chanell Fletcher, Deputy Executive Officer, California Air Resources Board  
[Chanell.Fletcher@arb.ca.gov](mailto:Chanell.Fletcher@arb.ca.gov)

Jennifer Gress, Chief, Sustainable Transportation and Communities Division  
[Jennifer.Gress@arb.ca.gov](mailto:Jennifer.Gress@arb.ca.gov)



# South Coast Air Quality Management District

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

SENT VIA E-MAIL:

February 6, 2025

[jking@paramountcity.com](mailto:jking@paramountcity.com)

John King, Interim Planning Director  
City of Paramount Planning Department  
16400 Colorado Ave,  
Paramount, CA 90723

**Notice of Preparation of a Draft Environmental Impact Report for the  
Clearwater Specific Plan (Proposed Project)  
(SCH No. 2025010201)**

South Coast Air Quality Management District (South Coast AQMD) staff appreciate the opportunity to comment on the above-mentioned document. Our comments are recommendations on the analysis of potential air quality impacts from the Proposed Project that should be included in the Draft Environmental Impact Report (EIR). Please send a copy of the Draft EIR upon its completion and public release directly to South Coast AQMD as copies of the Draft EIR submitted to the State Clearinghouse are not forwarded. **In addition, please send all appendices and technical documents related to the air quality, health risk, and greenhouse gas analyses (electronic versions of all emission calculation spreadsheets, air quality modeling, and health risk assessment input and output files, not PDF files). Any delays in providing all supporting documentation for our review will require additional review time beyond the end of the comment period.**

**CEQA Air Quality Analysis**

Staff recommends that the Lead Agency use South Coast AQMD's CEQA Air Quality Handbook and website<sup>1</sup> as guidance when preparing the air quality and greenhouse gas analyses. It is also recommended that the Lead Agency use the CalEEMod<sup>2</sup> land use emissions software, which can estimate pollutant emissions from typical land use development and is the only software model maintained by the California Air Pollution Control Officers Association.

South Coast AQMD has developed both regional and localized significance thresholds. South Coast AQMD staff recommends that the Lead Agency quantify criteria pollutant emissions and compare the emissions to South Coast AQMD's air quality significance thresholds<sup>3</sup> and localized significance thresholds (LSTs)<sup>4</sup> to determine the Proposed Project's air quality impacts. The localized analysis can be conducted by either using the LST screening tables or performing dispersion modeling.

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<sup>1</sup> South Coast AQMD's CEQA Air Quality Handbook and other resources for preparing air quality analyses can be found at: <http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook>.

<sup>2</sup> CalEEMod is available free of charge at: [www.caleemod.com](http://www.caleemod.com).

<sup>3</sup> South Coast AQMD's air quality significance thresholds can be found at: <https://www.aqmd.gov/docs/default-source/ceqa/handbook/south-coast-aqmd-air-quality-significance-thresholds.pdf>

<sup>4</sup> South Coast AQMD's guidance for performing a localized air quality analysis can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>.

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

If the Proposed Project generates diesel emissions from long-term construction or attracts diesel-fueled vehicular trips, especially heavy-duty diesel-fueled vehicles, it is recommended that the Lead Agency perform a mobile source health risk assessment.<sup>5</sup>

Also, if implementation of the Proposed Project would require the use of new stationary and portable sources, including but not limited to emergency generators, fire water pumps, boilers, spray booths, etc., one or more air permits from South Coast AQMD will be required, and the role of South Coast AQMD would change from a Commenting Agency to a Responsible Agency under CEQA. The assumptions in the air quality analysis in the EIR will be the basis for evaluating the air permit(s) under CEQA and imposing permit conditions and limits. Questions about air permit requirements should be directed to South Coast AQMD's Engineering and Permitting staff at (909) 396-3385.

In addition, if air permits are required and the South Coast AQMD is identified as a Responsible Agency in the EIR, per CEQA Guidelines Sections 15086, the Lead Agency is required to consult with South Coast AQMD. CEQA Guidelines Section 15096 sets forth specific procedures for a Responsible Agency, including making a decision on the adequacy of the CEQA document for use as part of evaluating the applications for air permits. For these reasons, the EIR should include a discussion about any new stationary and portable equipment requiring South Coast AQMD air permits and identify South Coast AQMD as a Responsible Agency for the Proposed Project, if applicable.

The California Air Resources Board's (CARB) *Air Quality and Land Use Handbook: A Community Health Perspective*<sup>6</sup> is a general reference guide for evaluating and reducing air pollution impacts associated with new projects that go through the land use decision-making

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<sup>5</sup> South Coast AQMD's guidance for performing a mobile source health risk assessment can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis>.

<sup>6</sup> CARB's *Air Quality and Land Use Handbook: A Community Health Perspective* can be found at: <https://www.aqmd.gov/docs/default-source/ceqa/handbook/california-air-resources-board-air-quality-and-land-use-handbook-a-community-health-perspective.pdf>.

process with additional guidance on strategies to reduce air pollution exposure near high-volume roadways available in CARB's technical advisory<sup>7</sup>.

The South Coast AQMD's *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning*<sup>8</sup> includes suggested policies that local governments can use in their General Plans or through local planning to prevent or reduce potential air pollution impacts and protect public health. It is recommended that the Lead Agency review this Guidance Document as a tool when making local planning and land use decisions.

South Coast AQMD staff is concerned about potential public health impacts of siting industrial uses within close proximity of sensitive land uses, especially in communities that are already heavily affected by the existing truck activities in that area. The South Coast AQMD's Multiple Air Toxics Exposure Study (MATES V), completed in August 2021, concluded that the largest contributor to cancer risk from air pollution is diesel particulate matter (DPM) emissions<sup>9</sup>. According to the MATES V carcinogenic risk interactive map, the area surrounding the Proposed Project has an estimated cancer risk of over 540 in one million<sup>10</sup>. Operation of industrial use and manufacturing generates and attracts heavy-duty diesel-fueled trucks that emit DPM. When the health impacts from the Proposed Project are added to those existing impacts, residents living in the communities surrounding the Proposed Project will possibly face an even greater exposure to air pollution and bear a disproportionate burden of increasing health risks.

### **Mitigation Measures**

In the event that the Proposed Project results in significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized to minimize these impacts. Any impacts resulting from mitigation measures must also be analyzed. Several resources to assist the Lead Agency with identifying potential mitigation measures for the Proposed Project include South Coast AQMD's CEQA Air Quality Handbook,<sup>11</sup> South Coast AQMD's Mitigation Monitoring and Reporting Plan for the 2022 Air Quality Management Plan,<sup>12</sup> and Southern California Association of Government's Mitigation Monitoring and Reporting Plan for the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy.<sup>13</sup>

Mitigation measures for operational air quality impacts from mobile sources that the Lead Agency should consider in the Draft EIR may include the following:

- Require zero-emissions (ZE) or near-zero emission (NZE) on-road haul trucks such as heavy-duty trucks with natural gas engines that meet the CARB's adopted optional NOx emissions standard at 0.02 grams per brake horsepower-hour (g/bhp-hr), if and when

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<sup>7</sup> CARB's technical advisory can be found at: [https://ww2.arb.ca.gov/sites/default/files/2017-10/rd\\_technical\\_advisory\\_final.pdf](https://ww2.arb.ca.gov/sites/default/files/2017-10/rd_technical_advisory_final.pdf).

<sup>8</sup> South Coast AQMD. 2005. *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning*. Available at: <http://www.aqmd.gov/docs/default-source/planning/air-quality-guidance/complete-guidance-document.pdf>.

<sup>9</sup> South Coast AQMD. August 2021. *Multiple Air Toxics Exposure Study in the South Coast Air Basin V*. Available at: <http://www.aqmd.gov/home/air-quality/air-quality-studies/health-studies/mates-v>.

<sup>10</sup> South Coast AQMD. MATES V Data Visualization Tool. Accessed at: [MATES Data Visualization \(arcgis.com\)](https://www.aqmd.gov/home/air-quality/air-quality-studies/health-studies/mates-v).

<sup>11</sup> <https://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook>

<sup>12</sup> South Coast AQMD's 2022 Air Quality Management Plan can be found at: <http://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan> (Chapter 4 - Control Strategy and Implementation).

<sup>13</sup> Southern California Association of Governments' 2020-2045 RTP/SCS can be found at: [https://www.connectsocal.org/Documents/PEIR/certified/Exhibit-A\\_ConnectSoCal\\_PEIR.pdf](https://www.connectsocal.org/Documents/PEIR/certified/Exhibit-A_ConnectSoCal_PEIR.pdf).

feasible. Given the state's clean truck rules and regulations aiming to accelerate the utilization and market penetration of ZE and NZE trucks such as the Advanced Clean Trucks Rule<sup>14</sup> and the Heavy-Duty Low NOx Omnibus Regulation<sup>15</sup>, ZE and NZE trucks will become increasingly more available to use. The Lead Agency should require a phase-in schedule to incentivize the use of these cleaner operating trucks to reduce any significant adverse air quality impacts. South Coast AQMD staff is available to discuss the availability of current and upcoming truck technologies and incentive programs with the Lead Agency. At a minimum, require the use of 2010 model year<sup>16</sup> that meet CARB's 2010 engine emissions standards at 0.01 g/bhp-hr of particulate matter (PM) and 0.20 g/bhp-hr of NOx emissions or newer, cleaner trucks. Include environmental analyses to evaluate and identify sufficient electricity and supportive infrastructures in the Energy and Utilities and Service Systems Sections in the CEQA document, where appropriate. Include the requirement in applicable bid documents, purchase orders, and contracts. Operators shall maintain records of all trucks associated with project construction to document that each truck used meets these emission standards, and make the records available for inspection. The Lead Agency should conduct regular inspections to the maximum extent feasible to ensure compliance.

- Limit the daily number of trucks allowed at the Proposed Project to levels analyzed in the Final CEQA document. If higher daily truck volumes are anticipated to visit the site, the Lead Agency should commit to re-evaluating the Proposed Project through CEQA prior to allowing this higher activity level.
- Provide electric vehicle (EV) charging stations or, at a minimum, provide electrical infrastructure and electrical panels should be appropriately sized. Electrical hookups should be provided for truckers to plug in any onboard auxiliary equipment.

Mitigation measures for operational air quality impacts from other area sources that the Lead Agency should consider in the Draft EIR may include the following:

- Maximize use of solar energy by installing solar energy arrays.
- Use light colored paving and roofing materials.
- Utilize only Energy Star heating, cooling, and lighting devices, and appliances.
- Use of water-based or low VOC cleaning products that go beyond the requirements of South Coast AQMD Rule 1113.

Design considerations for the Proposed Project that the Lead Agency should consider to further reduce air quality and health risk impacts include the following:

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<sup>14</sup> CARB. June 25, 2020. *Advanced Clean Trucks Rule*. Accessed at: <https://ww2.arb.ca.gov/our-work/programs/advanced-clean-trucks>.

<sup>15</sup> CARB has recently passed a variety of new regulations that require new, cleaner heavy-duty truck technology to be sold and used in state. For example, on August 27, 2020, CARB approved the Heavy-Duty Low NOx Omnibus Regulation, which will require all trucks to meet the adopted emission standard of 0.05 g/hp-hr starting with engine model year 2024. Accessed at: <https://ww2.arb.ca.gov/rulemaking/2020/hdomnibuslownox>.

<sup>16</sup> CARB adopted the statewide Truck and Bus Regulation in 2010. The Regulation requires diesel trucks and buses that operate in California to be upgraded to reduce emissions. Newer heavier trucks and buses must meet particulate matter filter requirements beginning January 1, 2012. Lighter and older heavier trucks must be replaced starting January 1, 2015. By January 1, 2023, nearly all trucks and buses will need to have 2010 model year engines or equivalent. More information on the CARB's Truck and Bus Regulation is available at: <https://www.arb.ca.gov/msprog/onrdiesel/onrdiesel.htm>.

- Clearly mark truck routes with trailblazer signs, so that trucks will not travel next to or near sensitive land uses (e.g., residences, schools, day care centers, etc.).
- Design the Proposed Project such that truck entrances and exits are not facing sensitive receptors and trucks will not travel past sensitive land uses to enter or leave the Proposed Project site.
- Design the Proposed Project such that any check-in point for trucks is inside the Proposed Project site to ensure that there are no trucks queuing outside.
- Design the Proposed Project to ensure that truck traffic inside the Proposed Project site is as far away as feasible from sensitive receptors.
- Restrict overnight truck parking in sensitive land uses by providing overnight truck parking inside the Proposed Project site.

South Coast AQMD staff is available to work with the Lead Agency to ensure that air quality, greenhouse gas, and health risk impacts from the Proposed Project are accurately evaluated and mitigated where feasible. If you have any questions regarding this letter, please contact me at [swang1@aqmd.gov](mailto:swang1@aqmd.gov).

Sincerely,

*Sam Wang*

Sam Wang  
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