Connie Chung, AICP, Supervising Regional Planner
Department of Regional Planning
320 West Temple Street, Room 1356
Los Angeles, CA 90012

August 7, 2014

Subject: City of Carson Comments on the Los Angeles County General Plan Update DEIR

Dear Ms. Chung,

City of Carson commends Los Angeles County’s effort in the preparation of your General Plan update. We have had a chance to review your General Plan Update and the DEIR and have the following comments and concerns:

The City of Carson will be impacted by the proposed West Carson TOD and the Del Amo Station TOD. We believe the designation of TOD is appropriate for these locations. However, impacts from these high density and intensive TODs on the City of Carson infrastructure and services have not been properly addressed in the DEIR.

Specifically, fire, police, and library services will be impacted within the City. In addition, the additional population will impact City’s parks and streets. The DEIR states that these impacts will be mitigated by the development impact fees imposed by the County; however, the DEIR is not clear how the collection of these fees by the County would mitigate impacts to City services, facilities, and infrastructure.

TODs are a necessary component of future development of these areas to encourage alternative means of transportation other than single occupant automobiles. Therefore, future developments within these TODs should be required to provide a complete package of all modes of transportation to encourage the residents not to use their cars. These TOD Specific Plans should include specific provisions to include necessary infrastructure and/or programs for pedestrians, bicycles, personal transportation vehicles, neighborhood electric vehicles, car sharing services, and transit services.
The DEIR should include a discussion to identify, construct, establish, connect, use, manage, maintain, and promote a complete mobility package to the residents, employees, and employers. In addition, the infrastructure, equipment, and management of this comprehensive network need to be discussed in the DEIR. If this complete transportation network is not established, managed, and used, higher densities would translate to more automobiles on City streets which has not been addressed in the DEIR. We believe this approach should be used for all proposed TODs within the County General Plan.

City of Carson appreciates the opportunity to comment on the General Plan Update DEIR. I can be reached at (310) 952-1761 or snaaseh@carson.ca.us if you have any questions.

Sincerely,

Saied Naaseh
Associate Planner