



# CT Warehouse Project

## Initial Study/Mitigated Negative Declaration



Final | April 2020

Prepared for:  
**City of Carson**

Prepared by:

**Michael Baker**  
INTERNATIONAL

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**FINAL  
INITIAL STUDY/MITIGATED NEGATIVE DECLARATION**

**CT Warehouse Project**

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Lead Agency:

**CITY OF CARSON**  
701 East Carson Street  
Carson, California 90745  
**Contact: Ms. Manraj Bhatia, Assistant Planner**  
310.952.1761

Prepared by:

**MICHAEL BAKER INTERNATIONAL**  
5 Hutton Centre Drive, Suite 500  
Santa Ana, California 92707  
**Contact: Ms. Kristen Bogue**  
949.855.5747

April 2020

JN 176054

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## **1.0 INTRODUCTION**

The CT Warehouse Project (herein referenced as the “project”) would demolish a former salvage yard and two residential dwellings (and associated ancillary structures) in order to construct a new 145,840-square foot warehouse facility with associated surface parking and landscaping at 333 West Gardena Boulevard, in the City of Carson, California. The facility would include distribution/warehousing/ manufacturing uses with supporting office space. The project would require the discretionary approvals of a Site Plan and Design Review and a Tree Removal Permit. The project would also require a National Pollutant Discharge Elimination System (NPDES) Permit and Groundwater Monitoring Well Relocation Approval from the Los Angeles Regional Water Quality Control Board (Los Angeles RWQCB).

The Initial Study/Mitigated Negative Declaration (IS/MND) (State Clearinghouse No. 2020030427) was made available for public review and comment pursuant to CEQA Guidelines Section 15073. The public review commenced on March 13, 2020 and concluded on April 13, 2020. The IS/MND and supporting attachments were available for review by the general public at:

- City of Carson Community Development Department – Planning Division, 701 East Carson Street, Carson, California 90745
- City of Carson website: <http://ci.carson.ca.us/CommunityDevelopment/Planning.aspx>
- City of Carson Public Library, 151 East Carson Street, Carson, California 90745

It is acknowledged that due to COVID-19, City Hall and the Library were closed during a portion of the public review period. Notwithstanding, the document was available for review on the City of Carson’s official website, as indicated above. Further, agencies and the public were directed to contact City staff, Ms. Manraj Bhatia via telephone at 310.952.1761, Ext. 1768, via email at [mbhatia@carson.ca.us](mailto:mbhatia@carson.ca.us), or via mail at City of Carson Community Development Department – Planning Division, 701 East Carson Street, Carson, California 90745, with any questions or concerns regarding the document, including other options for review.



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## 2.0 RESPONSE TO COMMENTS

During the public review period, comment letters were received on the IS/MND from interested public agencies, organizations, and individuals. The following is a list of commenters on the IS/MND during the public review period.

Comment Letter No.	Person, Firm, or Agency	Letter Dated
1	State Clearinghouse and Planning Unit Governor's Office of Planning and Research Christine Asiata Rodriguez	April 14, 2020
2	California Department of Transportation District 7 Miya Edmonson, IGR/CEQA Branch Chief	April 13, 2020
3	Los Angeles County Department of Public Works Toan Duong, Civil Engineer	April 13, 2020
4	County of Los Angeles Fire Department Prevention Services Bureau Ronald M. Durbin, Chief, Forestry Division	April 7, 2020

Although the CEQA Guidelines do not require a lead agency to prepare written responses to comments received (see CEQA Guidelines Section 15088), the City of Carson has elected to prepare the following written responses with the intent of conducting a comprehensive and meaningful evaluation of the proposed project. The number designations in the responses are correlated to the bracketed and identified portions of each comment letter.

## COMMENT LETTER 1

**From:** Christine Asiata [<mailto:Christine.Asiata@OPR.CA.GOV>]

**Sent:** Tuesday, April 14, 2020 3:35 PM

**To:** Manraj Bhatia

**Subject:** SCH# 2020030427

The State Clearinghouse would like to inform you that our office will be transitioning from providing a hard copy of acknowledging the close of review period on your project to electronic mail system.

**Please visit:** <https://ceqanet.opr.ca.gov/2020030427/2> for full details about your project and if any state agencies submitted comments by close of review period (note: any state agencies in **bold**, submitted comments and are available).

This email acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act.

Please email the State Clearinghouse at [state.clearinghouse@opr.ca.gov](mailto:state.clearinghouse@opr.ca.gov) for any questions regarding the environmental review process. If you have a question about the above-named project, please refer to the ten-digit State Clearinghouse number when contacting this office.

Christine Asiata Rodriguez

1-1

1-2

# CT Warehouse Project

## Summary

<b>SCH Number</b>	2020030427
<b>Lead Agency</b>	Carson, City of ( <i>City of Carson</i> )
<b>Document Title</b>	CT Warehouse Project
<b>Document Type</b>	MND - Mitigated Negative Declaration
<b>Received</b>	3/12/2020
<b>Project Applicant</b>	CT Realty Investors
<b>Present Land Use</b>	Light Industrial/Manufacturing

**Document Description** The project would demolish a former salvage yard and two residential dwellings (and associated ancillary structures) in order to construct a new 145,840-square foot warehouse facility with associated surface parking and landscaping. The facility would include distribution/warehousing/manufacturing uses with supporting office space.

The project would require the discretionary approvals of a Site Plan and Design Review and a Tree Removal Permit. The project would also require a National Pollutant Discharge Elimination System (NPDES) Permit and Groundwater Monitoring Well Relocation Approval from the Los Angeles Regional Water Quality Control Board.

**Contact Information** Manraj Bhatia  
City of Carson

701 East Carson Street  
Carson, CA 90745

Phone : (310) 952-1761 ext. 1768

mbhatia@carson.ca.us

## Location

<b>Coordinates</b>	33°52'58.3"N 118°16'46.9"W
<b>Cities</b>	Carson
<b>Counties</b>	Los Angeles
<b>Regions</b>	Southern California
<b>Cross Streets</b>	West Gardena Boulevard and South Broadway
<b>Zip</b>	90248
<b>Total Acres</b>	6.58
<b>Jobs</b>	80
<b>Parcel #</b>	6125-019-024, -041 to -044, and -050
<b>State Highways</b>	SR-91, I-405, I-110
<b>Railways</b>	N/A
<b>Airports</b>	Compton/Woodley Airport
<b>Schools</b>	Numerous

**Waterways** Dominguez Channel  
**Township** 03S  
**Range** 13W  
**Section** 30  
**Base** SBBM

## Notice of Completion

**Review Period Start** 3/13/2020  
**Review Period End** 4/13/2020  
**Development Type** Industrial (Warehouse/Manufacturing/Office)(145,840 Sq. Ft., 6.58 Acres, 80 Employees)  
**Local Action** Site Plan Grading Permit Design Review  
**Project Issues** Aesthetic/Visual Agricultural Land Air Quality Archaeologic-Historic Biological Resources Drainage/Absorption  
 Flood Plain/Flooding Forest Land/Fire Hazard Geologic/Seismic Greenhouse Gas Emissions Housing  
 Job Generation Minerals Noise Population/Housing Balance Public Services Recreation/Parks  
 Schools/Universities Septic System Sewer Capacity Soil Erosion/Compaction/Grading Solid Waste  
 Toxic/Hazardous Traffic/Circulation Tribal Cultural Resources Vegetation Water Quality Water Supply  
 Wetland/Riparian Wildlife Growth Inducing Land Use Cumulative Effects Other  
**Reviewing Agencies** California Air Resources Board California Department of Fish and Wildlife, South Coast Region 5  
 California Department of Forestry and Fire Protection California Department of Parks and Recreation  
 California Department of Transportation, Division of Transportation Planning California Department of Water Resources  
 California Native American Heritage Commission California Natural Resources Agency  
 California Regional Water Quality Control Board, Los Angeles Region 4 California State Lands Commission  
 Department of Toxic Substances Control Office of Historic Preservation  
 San Gabriel and Lower Los Angeles Rivers and Mountains Conservancy  
 State Water Resources Control Board, Division of Water Quality California Department of Transportation, District 7

## Attachments

**Environmental Document**  
 Appendix A\_AQ-GHG-Energy PDF 1043 K Appendix B\_Cultural PDF 6387 K  
 Appendix C\_Geotech PDF 6631 K Appendix D Health Risk Assessment PDF 1113 K  
 Appendix E\_Haz PDF 96163 K Appendix F\_Hydro PDF 4129 K  
 Appendix G\_Noise Data PDF 3854 K Appendix H\_Will Serve PDF 204 K  
 Appendix I\_Traffic PDF 4011 K CT Warehouse Public Review Draft IS-MND\_03-13-20 PDF 9049 K  
 CT Warehouse\_Summary Form\_02-28-20 PDF 624 K Notice of Intent\_03-12-20 PDF 127 K  
**NOC**  
 CT Warehouse\_NOC\_03-12-20 PDF 196 K  
**State Comments**  
 2020030427\_Caltrans Comment PDF 208 K

**Disclaimer:** The Governor's Office of Planning and Research (OPR) accepts no responsibility for the content or accessibility of these documents. To obtain an attachment in a different format, please contact the lead agency at the contact information listed above. You may also contact the OPR via email at [state.clearinghouse@opr.ca.gov](mailto:state.clearinghouse@opr.ca.gov) or via phone at (916) 445-0613. For more information, please visit [OPR's Accessibility Site](#).



## **Response No. 1**

State Clearinghouse and Planning Unit  
Governor's Office of Planning and Research  
Christine Asiata Rodriguez  
April 14, 2020

- 1-1 The commenter indicates that the State Clearinghouse will be transitioning from providing hard copy of acknowledging the close of review period of the proposed project to electronic mail system. The commenter also refers the reader to the State Clearinghouse CEQA database, via a web link, to retrieve details about the proposed project and comments submitted by State agencies, if any. A copy of this web page follows this comment letter. One State agency letter was received from the State Clearinghouse CEQA database and is included herein as Comment Letter 2.
- 1-2 The commenter indicates that the City of Carson complied with the review requirements for draft environmental documents pursuant to CEQA. As such, the comment does not provide specific comments regarding information presented in the Draft IS/MND and no further response is necessary.

**DEPARTMENT OF TRANSPORTATION**

DISTRICT 7 – Office of Regional Planning  
100 S. MAIN STREET, MS 16  
LOS ANGELES, CA 90012  
PHONE (213) 897-0475  
FAX (213) 897-1337  
TTY 711  
www.dot.ca.gov

**COMMENT LETTER 2**



*Making Conservation  
a California Way of Life.*

April 13, 2020

Manraj Bhatia  
City of Carson – Planning Division  
701 East Carson Street  
Carson, CA 90745

RE: CT Warehouse Project – Mitigated Negative  
Declaration (MND)  
GTS # 07-LA-2020-03212  
SCH # 2020030427  
Vic. LA-110/PM: 10.554

Dear Manraj Bhatia:

Thank you for including the California Department of Transportation (Caltrans) in the review process for the above referenced MND. The project would demolish a former salvage yard and two residential dwellings to construct a new 145,840-square foot warehouse facility with associated surface parking and landscaping. The facility would include distribution/warehousing/manufacturing uses with supporting office space. A total of 146 parking spaces would be provided for employees and visitors in surface parking lots located along building perimeters, exceeding the City’s 120 spaces requirement for the proposed development. Twenty-five truck loading docks for loading/unloading equipment and supplies would be located along the eastern perimeter of the facility. The City of Carson is considered the Lead Agency under the California Environmental Quality Act (CEQA).

2-1

The project is located approximately 1,700 feet away from Interstate 110 (I-110) at W Gardena Boulevard, 4,000 feet away from the I-110 & State Route 91 (SR-91) interchange, and 2 miles away from the I-110 & Interstate 405 (I-405) interchange.

From reviewing the MND, Caltrans has the following comments:

- The City of Carson has chosen to analyze the transportation impacts of this project in terms of Level of Service (LOS). As a reminder, Senate Bill 743 (2013) mandates that Vehicle Miles Traveled (VMT) be used as the primary metric in identifying transportation impacts of all future development projects under CEQA, starting July 1, 2020. For information on determining transportation impacts in terms of VMT on the State Highway System, see the Technical Advisory on Evaluating Transportation Impacts in CEQA by the California Governor’s Office of Planning and Research, dated December 2018: [http://opr.ca.gov/docs/20190122-743\\_Technical\\_Advisory.pdf](http://opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf).
- We do not anticipate this project to have a direct adverse impact on any state facilities, however, the below issues in the transportation impact analysis (TIA) should not appear in future TIAs completed for other projects. Some of these issues only apply to those TIAs completed in terms of LOS before July 1, 2020.
  - Caltrans recommends that the HCM 6<sup>th</sup> Edition rather than the 2010 Edition be used.
  - Due to the project’s large truck volumes, Synchro analyses should be based on actual heavy vehicles percentages rather than the default of 2%.

2-2

2-3

- It is unclear whether the Synchro analyses for the existing conditions scenarios are based on actual or optimized signal timings. Caltrans recommends that actual signal timings be used.
- Caltrans recommends that more relevant data than the City of Fontana Truck Trip Generation Study for Light Industrial Uses (August 2003) be used to estimate the heavy vehicle mix. Similarly, Caltrans recommends utilizing more relevant Passenger Car Equivalent (PCE) factors for conversion of trucks into passenger vehicles than San Bernardino County PCE conversion factors.

2-3  
cont'd

The following information is included for your consideration.

The mission of Caltrans is to provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability. Furthermore, Caltrans encourages the Lead Agency to integrate transportation and land use in a way that reduces VMT and Greenhouse Gas (GHG) emissions, as well as facilitates a high level of non-motorized travel and transit use. Thus, Caltrans supports the Transportation Demand Management (TDM) strategies that this project has incorporated, such as providing a bike rack near the western driveway and replacing the sidewalk, curb, and gutter along the project's frontage at West Gardena Boulevard. Additional TDM strategies that the City of Carson may want to consider integrating into this project include:

2-4

- Decrease the amount of vehicle parking provided to be no more than required, which would be 120 stalls for this project, according to the MND. This could be accomplished by offering additional bicycle parking at various safe and convenient locations near employee work stations.
- Confirm that bike parking is secure, convenient, and accessible.
- Ensure that the new pedestrian facilities along West Gardena Boulevard are ADA compliant.
- Provide convenient and accommodating access throughout the development.

Finally, any transportation of heavy construction equipment and/or materials which requires use of oversized-transport vehicles on State highways will need a Caltrans transportation permit. Caltrans recommends that the project limit construction traffic to off-peak periods to minimize the potential impact on State facilities. If construction traffic is expected to cause delays on any State facilities, please submit the Traffic Management Plan detailing these delays for Caltrans' review.

2-5

If you have any questions about these comments, please contact Emily Gibson, the project coordinator, at [Emily.Gibson@dot.ca.gov](mailto:Emily.Gibson@dot.ca.gov), and refer to GTS # 07-LA-2020-03212.

Sincerely,



MIYA EDMONSON  
IGR/CEQA Branch Chief  
cc: Scott Morgan, State Clearinghouse



## **Response No. 2**

California Department of Transportation District 7  
Miya Edmonson, IGR/CEQA Branch Chief  
April 13, 2020

- 2-1 This comment provides a general summary of the proposed project and notes that the proposed project is in close proximity to State facilities including the Interstate 110 (I-110), the I-110 and State Route 91 (SR-91) interchange, and the I-110 & Interstate 405 (I-405) interchange. The comment provides a summary of the project description and existing transportation conditions. This summary is acknowledged; responses to specific comments within this letter are provided below.
- 2-2 The commenter notes that the City of Carson has chosen to analyze the transportation impacts of this project in terms of Level of Services (LOS). The commenter states that Vehicle Miles Traveled (VMT) is to be used as the primary metric in identifying transportation impacts of all future development projects under CEQA starting July 1, 2020, as mandated by Senate Bill 743 (2013). The commenter acknowledges that the California Department of Transportation (Caltrans) determines transportation impacts in terms of VMT on the State Highway System via the *Technical Advisory on Evaluating Transportation Impacts in CEQA*, published by the Governor's Office of Planning and Research, dated December 2018. The commenter does not identify a specific concern with the adequacy of the Draft IS/MND or raise an issue or comment specifically related to the Draft IS/MND's environmental analysis. Therefore, no further response is required.
- 2-3 The commenter notes that a direct adverse impact to existing State transportation facilities is not anticipated from the project. The commenter also provides recommendations for future transportation impact analysis (TIA) completed for other projects in the City, specifically for LOS analyses. This comment is acknowledged and will be considered by the City of Carson for future LOS transportation analyses involving State transportation facilities.
- 2-4 The commenter notes that Caltrans supports the Transportation Demand Management (TDM) strategies utilized in the proposed project and encourages the continued integration of transportation and land use to reduce VMT and Greenhouse Gas (GHG) emissions, as well as facilitation of non-motorized travel and transit use. Caltrans also provides additional TDM strategy recommendations for incorporation into the proposed project. This comment does not identify a specific concern with the adequacy of the Draft IS/MND or raise an issue or comment specifically related to the Draft IS/MND's environmental analysis. As no significant impacts would result from the project's greenhouse gas emissions, no additional mitigation measures are required. Notwithstanding, the comment is acknowledged and will be considered by the City of Carson during project deliberations. No further response is required.
- 2-5 The commenter notes that the transportation of heavy construction equipment or materials, which requires use of oversized-transport vehicles on State highways, will need a Caltrans transportation permit and recommends that large-size truck trips be limited to off-peak commute





periods to minimize potential transportation impacts on State facilities. The commenter also notes that a Traffic Management Plan (TMP) should be submitted to Caltrans, should construction traffic be anticipated to result in delays on any State transportation facilities. It is acknowledged that the project is required to submit a TMP to be approved by the City of Carson (Mitigation Measure TRA-1) on Draft IS/MND page 4.17-7. Should a Caltrans transportation permit be required for the project, the applicant will comply with all laws and regulations, including those implemented by Caltrans. This comment does not identify a specific concern with the adequacy of the Draft IS/MND or raise an issue or comment specifically related to the Draft IS/MND's environmental analysis. No further response is required.

# COMMENT LETTER 3

**From:** [Toan Duong](#)  
**Sent:** Monday, April 13, 2020 5:16 PM  
**To:** [bhatia@carson.ca.us](mailto:bhatia@carson.ca.us); [Nilda Gemeniano](#)  
**Cc:** [Jose Cruz](#); [Jose Suarez](#)  
**Subject:** RE: City of Carson CT Warehouse Project MND

Manraj Bhatia,

Thank you for the opportunity to review the subject project IS/MND. Public Works has the following comments for your consideration:

## 1. Storage Space for Recyclables

- The California Solid Waste Reuse and Recycling Access Act of 1991, as amended, requires each development project to provide an adequate storage area for collection and removal of recyclable materials. Environmental documents should include/discuss standards to provide adequate recyclable storage areas for collection/storage of recyclable and green waste materials for this project. Please contact Public Works' Environmental Programs Division at (626) 458-2193 for more information about the required storage area for collection and removal of recyclable materials.

3-1

## 2. Underground Storage Tanks / Industrial Waste / Stormwater

- Prior to construction, installation, modification or removal of underground storage tanks (Los Angeles County Code [LACC] Title 11, Division 4), industrial waste treatment or disposal facilities, and/or storm water treatment facilities, Public Works' Environmental Programs Division must be contacted for required approvals and operating permits. Specific industry types will also be subject to registration and inspections related to implementation of best management practices to prevent stormwater related pollution (LACC Title 12, Chapter 12.80). Visit (<http://dpw.lacounty.gov/epd/Stormwater/inspection.cfm>) online or contact Public Works' Environmental Program Division at (626) 458-3517 for more permit information.
- Upon initial approval by the City of Carson, the owner will be required to submit permit applications for industrial/domestic waste disposal clearance and comply with requirements regarding low-impact development/standard urban stormwater mitigation plan for the warehouse.

3-2

3-3

If you have any questions regarding comments no. 1 and 2, please contact Nilda Gemeniano at (626) 458-5184, or [ngemenia@pw.lacounty.gov](mailto:ngemenia@pw.lacounty.gov).

If you have any other question, please contact me. Thank you.

Toan Duong  
Civil Engineer



### **Response No. 3**

Los Angeles County Department of Public Works  
Toan Duong, Civil Engineer  
April 13, 2020

3-1 The commenter states that the California Solid Waste Reuse and Recycling Access Act of 1991, as amended, requires development project to provide an adequate storage area for collection and removal of recyclable materials. The commenter further notes that environmental documents should discuss standards to provide adequate recyclable storage areas for collection/storage of recyclable and green waste materials. The Draft IS/MND includes standards consideration pertaining to the California Solid Waste Reuse and Recycling Access Act of 1991 (Draft IS/MND page 4.8-10). As discussed, these regulations apply to municipal agencies who are responsible for reducing landfill disposal of solid wastes collected in their jurisdictions. GHG emissions related to solid waste generation from the project would benefit from this regulation as it would decrease the overall amount of solid waste disposed of at landfills. The decrease in solid waste would then in return decrease the amount of methane released from the decomposing solid waste. Table 4.8-1, *Estimated Greenhouse Gas Emissions*, presents the estimated CO<sub>2</sub>, CH<sub>4</sub>, and N<sub>2</sub>O emissions of the proposed project. Project-related GHG emissions from solid waste generation provided in Table 4.8-1 include a 50-percent reduction in solid waste generation source emissions. Further, pursuant to the City's Municipal Code Chapter 2, *Collection of Solid Waste and Recyclable Materials*, in order to meet the requirements of the California Integrated Waste Management Act of 1989, including requirements for source reduction of the solid waste stream, diversion of solid waste from landfills and conservation of natural resources, the City regulates the collection of solid waste from commercial/industrial premises in addition to residential premises and to encourage recycling of solid waste materials.

The proposed project would be required to comply with the City's regulations pertaining to the storage, accumulation, collection and disposal of solid waste, including without limitation garbage, trash, debris and other discarded materials. Further, potential impacts on the City's waste management system associated with the proposed project are analyzed in Section 4.19, *Utilities and Service Systems*, of the Draft IS/MND. Specifically, Section 4.19 includes discussions on impacts on the attainment of solid waste reduction goals as required under CEQA Guidelines Appendix G Checklist. As detailed on pages 4.19-3 through 4.19-5 of the Draft IS/MND, the proposed project would comply with all Federal, State, and local statutes and regulations related to solid waste, including the California Integrated Waste Management Act and City requirements for solid waste generated during project construction and operation. As such, the proposed project would be required to provide an adequate storage area for collection and removal of recyclable materials, and the Draft IS/MND has addressed the aforementioned requirement.

3-2 The commenter notes that the project will be required to contact the Los Angeles County Department of Public Works' (LACDPWs') Environmental Programs Division for approvals and operating permits prior to the installation, modification, or removal of underground storage tanks, industrial waste treatment/disposal facilities, and/or storm water treatment facilities. This



comment is acknowledged; the project would be subject to compliance with all applicable local, State, and Federal laws, ordinances, and regulations, as well as the specific mitigation measures in the Draft IS/MND. This comment does not identify a specific concern with the adequacy of the Draft IS/MND or raise an issue or comment specifically related to the Draft IS/MND's environmental analysis. No further response is required.

- 3-3 The commenter notes that the project Applicant would be required to apply for industrial/domestic waste disposal clearance and to comply with requirements regarding low-impact development/standard urban stormwater mitigation plan. The project's potential impacts regarding low-impact development and stormwater mitigation are analyzed in Section 4.10 of the Draft IS/MND. As detailed in Section 4.10 of the Draft IS/MND, the proposed project would be subject to LACDPW requirements in the *2014 Low Impact Development (LID) Standards Manual* under the "Industrial parks with 10,000 square feet or more of surface area" category, which include compliance with the project-specific best management practices identified in the *Low Impact Development (LID) for 333 West Gardena Boulevard, Carson, California 90248, APNs: 6125-019-24, -41, -42, -43, -44 & -50* prepared for the proposed project; refer to Appendix F, *Hydrology and Water Quality Reports*, of the Draft IS/MND. This comment does not identify a specific concern with the adequacy of the Draft IS/MND or raise an issue or comment specifically related to the Draft IS/MND's environmental analysis. No further response is required.



**COUNTY OF LOS ANGELES  
FIRE DEPARTMENT**

1320 NORTH EASTERN AVENUE  
LOS ANGELES, CALIFORNIA 90063-3294  
(323) 881-2426  
www.fire.lacounty.gov

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FIRE CHIEF  
FORESTER & FIRE WARDEN

April 7, 2020

**COMMENT LETTER 4**

Manraj Bhatia, Assistant Planner  
City of Carson  
Community Development Department  
701 East Carson Street  
Carson, CA 90745

Dear Mr. Bhatia:

**NOTICE OF AVAILABILITY/INTENT TO ADOPT A MITIGATED NEGATIVE DECLARATION, "CT WAREHOUSE PROJECT," WOULD DEMOLISH A FORMER SALVAGE YARD AND TWO RESIDENTIAL DWELLINGS (AND ASSOCIATED ANCILLARY STRUCTURES) IN ORDER TO CONSTRUCT A NEW 145,840-SQUARE FOOT WAREHOUSE FACILITY WITH ASSOCIATED SURFACE PARKING AND LANDSCAPING, LOCATED AT 333 WEST GARDENA BOULEVARD, CARSON, FFER 2020001555**

The Notice of Availability/Intent to Adopt a Mitigated Negative Declaration has been reviewed by the Planning Division, Land Development Unit, Forestry Division, and Health Hazardous Materials Division of the County of Los Angeles Fire Department.

4-1

The following are their comments:

**PLANNING DIVISION:**

We have no comments.

4-2

For any questions regarding this response, please contact Loretta Bagwell, Planning Analyst, at (323) 881-2404 or [Loretta.Bagwell@fire.lacounty.gov](mailto:Loretta.Bagwell@fire.lacounty.gov).

**SERVING THE UNINCORPORATED AREAS OF LOS ANGELES COUNTY AND THE CITIES OF:**

- |              |             |                  |                      |                      |                       |                  |
|--------------|-------------|------------------|----------------------|----------------------|-----------------------|------------------|
| AGOURA HILLS | CALABASAS   | EL MONTE         | INDUSTRY             | LAWNDALE             | PARAMOUNT             | SIGNAL HILL      |
| ARTESIA      | CARSON      | GARDENA          | INGLEWOOD            | LOMITA               | PICO RIVERA           | SOUTH EL MONTE   |
| AZUSA        | CERRITOS    | GLENDORA         | IRWINDALE            | LYNWOOD              | POMONA                | SOUTH GATE       |
| BALDWIN PARK | CLAREMONT   | HAWAIIAN GARDENS | LA CANADA-FLINTRIDGE | MALIBU               | RANCHO PALOS VERDES   | TEMPLE CITY      |
| BELL         | COMMERCE    | HAWTHORNE        | LA HABRA             | MAYWOOD              | ROLLING HILLS         | WALNUT           |
| BELL GARDENS | COVINA      | HERMOSA BEACH    | LA MIRADA            | NORWALK              | ROLLING HILLS ESTATES | WEST HOLLYWOOD   |
| BELLFLOWER   | CUDAHY      | HIDDEN HILLS     | LA PUENTE            | PALMDALE             | ROSEMEAD              | WESTLAKE VILLAGE |
| BRADBURY     | DIAMOND BAR | HUNTINGTON PARK  | LAKWOOD              | PALOS VERDES ESTATES | SAN DIMAS             | WHITTIER         |
|              | DUARTE      |                  | LANCASTER            |                      | SANTA CLARITA         |                  |

**LAND DEVELOPMENT UNIT:**

The Land Development Unit is reviewing the proposed "CTWAREHOUSE PROJECT" for access and water system requirements. The Land Development Unit's comments are only general requirements. Specific fire and life safety requirements will be addressed during the review for building and fire plan check phases. There may be additional requirements during this time.

The development of this project must comply with all applicable code and ordinance requirements for construction, access, water mains, fire flows, and fire hydrants.

**ACCESS REQUIREMENTS:**

1. The proposed development will require multiple ingress/egress access for the circulation of traffic and emergency response issues.
2. All on-site Fire Department vehicular access roads shall be labeled as "Private Driveway and Fire Lane" on the site plan along with the widths clearly depicted on the plan. Labeling is necessary to assure the access availability for Fire Department use. The designation allows for appropriate signage prohibiting parking.
  - a. The Fire Apparatus Access Road shall be cross-hatch on the site plan, with the width clearly noted on the plan.
3. Every building constructed shall be accessible to Fire Department apparatus by way of access roadways with an all-weather surface of not less than the prescribed width. The roadway shall be extended to within 150 feet of all portions of the exterior walls when measured by an unobstructed route around the exterior of the building.
4. Fire Apparatus Access Roads must be installed and maintained in a serviceable manner prior to and during the time of construction.
5. The Fire Apparatus Access Roads and designated fire lanes shall be measured from flow line to flow line.
6. The dimensions of the approved Fire Apparatus Access Roads shall be maintained as originally approved by the fire code official.
7. Provide a minimum unobstructed width of 28 feet, exclusive of shoulders and an unobstructed vertical clearance "clear to sky" Fire Department vehicular access to within 150 feet of all portions of the exterior walls of the first story of the building, as measured by an approved route around the exterior of the building when the height of the building above the lowest level of the Fire Department vehicular access road is more than 30 feet high, or the building is more than three stories. The access roadway shall be located a minimum of 15 feet and a maximum of 30 feet from the building and shall be positioned parallel to one entire side of the building. The side of

the building on which the Aerial Fire Apparatus Access Road is positioned shall be approved by the fire code official.

8. Dead-end Fire Apparatus Access Roads in excess of 150 feet in-length shall be provided with an approved Fire Department turnaround. Include the dimensions of the turnaround, with the orientation of the turnaround shall be properly placed in the direction of travel of the access roadway.
9. Fire Department Access Roads shall be provided with a 32-foot centerline turning radius. Indicate the centerline, inside and outside turning radii for each change in direction on the site plan.
10. Fire Apparatus Access Roads shall be designed and maintained to support the imposed load of fire apparatus weighing 75,000 lbs. and shall be surfaced so as to provide all-weather driving capabilities. Fire Apparatus Access Roads having a grade of 10 percent or greater shall have a paved or concrete surface.
11. Provide approved signs or other approved notices or markings that include the words "NO PARKING - FIRE LANE." Signs shall have a minimum dimension of 12 inches wide by 18 inches high and have red letters on a white reflective background. Signs shall be provided for fire apparatus access roads, to clearly indicate the entrance to such road, or prohibit the obstruction thereof and at intervals, as required by the Fire Inspector.
12. A minimum 5-foot-wide approved firefighter access walkway leading from the Fire Department Access Road to all required openings in the building's exterior walls shall be provided for firefighting and rescue purposes. Clearly identify firefighter walkway access routes on the site plan. Indicate the slope and walking surface material. Clearly show the required width on the site plan.
13. Fire Apparatus Access Roads shall not be obstructed in any manner, including by the parking of vehicles, or the use of traffic calming devices, including but not limited to, speed bumps or speed humps. The minimum widths and clearances established in Fire Code Section 503.2.1 shall be maintained at all times.
14. Traffic Calming Devices, including but not limited to, speed bumps and speed humps, shall be prohibited unless approved by the Fire Code official.
15. Security barriers, visual screen barriers, or other obstructions shall not be installed on the roof of any building in such a manner as to obstruct firefighter access or egress in the event of fire or other emergency. Parapets shall not exceed 48 inches from the top of the parapet to the roof surface on more than two sides. Clearly indicate the height of all parapets in a section view.
16. Approved building address numbers, building numbers, or approved building identification shall be provided and maintained so as to be plainly visible and legible from the street fronting the property. The numbers shall contrast with their

background, be Arabic numerals or alphabet letters, and be a minimum of 4 inches high with a minimum stroke width of 0.5 inch.

17. Multiple residential and commercial buildings having entrances to individual units not visible from the street or road shall have unit numbers displayed in groups for all units within each structure. Such numbers may be grouped on the wall of the structure or mounted on a post independent of the structure and shall be positioned to be plainly visible from the street or road as required by Fire Code 505.3 and in accordance with Fire Code 505.1.

#### WATER SYSTEM REQUIREMENTS:

1. All fire hydrants shall measure 6"x 4"x 2-1/2" brass or bronze conforming to current AWWA standard C503 or approved equal and shall be installed in accordance with the 2017 County of Los Angeles Fire Code.
2. The development may require fire flows up to 4,000 gallons per minute at 20 pounds per square inch residual pressure for up to a four-hour duration. Final fire flows will be based on the size of buildings, the installation of an automatic fire sprinkler systems, and type(s) of construction used.
3. The fire hydrant spacing shall be every 300 feet for both the public and the on-site hydrants. The fire hydrants shall meet the following requirements:
  - a. No portion of lot frontage shall be more than 200 feet via vehicular access from a public fire hydrant.
  - b. No portion of a building shall exceed 400 feet via vehicular access from a properly spaced public fire hydrant.
  - c. Additional hydrants will be required if hydrant spacing exceeds specified distances.
4. An approved automatic fire sprinkler system is required for the proposed buildings within this development. Submit design plans to the Fire Department Sprinkler Plan Check Unit for review and approval prior to installation.
5. All required public fire hydrants shall be installed and tested prior to beginning construction.
6. Plans showing underground piping for private on-site fire hydrants shall be submitted to the Sprinkler Plan Check Unit for review and approval prior to installation.

4-3  
cont'd

Additional Department requirements will be determined by Fire Prevention Engineering at further development of the site.



For any questions regarding the report, please contact FPEA Claudia Soiza at (323) 890-4243 or [Claudia.soiza@fire.lacounty.gov](mailto:Claudia.soiza@fire.lacounty.gov).

4-3  
cont'd

**FORESTRY DIVISION – OTHER ENVIRONMENTAL CONCERNS:**

The statutory responsibilities of the County of Los Angeles Fire Department's Forestry Division include erosion control, watershed management, rare and endangered species, vegetation, fuel modification for Very High Fire Hazard Severity Zones, archeological and cultural resources, and the County Oak Tree Ordinance. Potential impacts in these areas should be addressed.

Under the Los Angeles County Oak tree Ordinance, a permit is required to cut, destroy, remove, relocate, inflict damage or encroach into the protected zone of any tree of the Oak genus which is 25 inches or more in circumference (eight inches in diameter), as measured 4 1/2 feet above mean natural grade.

4-4

If Oak trees are known to exist in the proposed project area further field studies should be conducted to determine the presence of this species on the project site. The County of Los Angeles Fire Department's Forestry Division has no further comments regarding this project.

For any questions regarding this response, please contact Forestry Assistant, Joseph Brunet at (818) 890-5719.

**HEALTH HAZARDOUS MATERIALS DIVISION:**

The Health Hazardous Materials Division (HHMD) of the Los Angeles County Fire Department advises that the Los Angeles Regional Water Quality Control Board (LARWQCB) is listed as the responsible environmental agency for the project site. It appears that the LARWQCB would be responsible for permitting and/or environmental oversight of the implementation of Mitigation Measures HAZ-1, HAZ-2, and HAZ-3. HHMD also notes that the Los Angeles County Department of Public Works, Environmental Programs Division could be involved with permitting issues associated with the implementation of Mitigation Measure HAZ-6, Vapor Barrier(s) Installation. HHMD has no additional comments at this time.

4-5

Please contact HHMD senior typist-clerk, Perla Garcia at (323) 890-4035 or [Perla.garcia@fire.lacounty.gov](mailto:Perla.garcia@fire.lacounty.gov) if you have any questions.

If you have any additional questions, please contact this office at (323) 890-4330.  
Very truly yours,



RONALD M. DURBIN, CHIEF, FORESTRY DIVISION  
PREVENTION SERVICES BUREAU



## **Response No. 4**

County of Los Angeles Fire Department  
Ronald M. Durbin, Chief, Forestry Division  
April 7, 2020

- 4-1 The commenter notes that the Notice of Availability/Intent to Adopt a Mitigated Negative Declaration has been reviewed by the Planning Division, Land Development Unit, Forestry Division, and Health Hazardous Materials Division of the County of Los Angeles Fire Department. This comment does not identify a specific concern with the adequacy of the Draft IS/MND or raise an issue or comment specifically related to the Draft IS/MND's environmental analysis. Therefore, no further response is warranted.
- 4-2 The commenter states that the Planning Division has no comments regarding the proposed project. As such, no further response is required.
- 4-3 The commenter states that the Land Development Unit is currently reviewing the proposed project for access and water system requirements. The commenter also provides a summary of applicable code and ordinance requirements for construction, access, water mains, fire flows, and fire hydrants. This comment does not identify a specific concern with the adequacy of the Draft IS/MND or raise an issue or comment specifically related to the Draft IS/MND's environmental analysis. Therefore, no further response is warranted.
- 4-4 The commenter notes that the general responsibilities of the County of Los Angeles Fire Department's Forestry Division include erosion control, watershed management, rare and endangered species, vegetation, fuel modification for Very High Fire Hazard Severity Zones, archeological and cultural resources, and the County Oak Tree Ordinance. The commenter indicates that the potential impacts in these areas should be addressed within the Draft IS/MND. The commenter also provides general information on the Los Angeles County Oak Tree Ordinance.

### **Erosion**

Potential impacts on erosion associated with the proposed project are analyzed in Section 4.7, *Geology and Soils*, and Section 4.10, *Hydrology and Water Quality*, of the Draft IS/MND. Specifically, as detailed on page 4.7-3 of the Draft IS/MND, the project site is generally flat; thus, significant erosion by water is unlikely during project construction. It is also noted that operations of the proposed project would not result in substantial soil erosion or the loss of topsoil, as the majority of the project site would be impervious. Further, as detailed on pages 4.10-2 and 4.10-3, the proposed project would be required to obtain coverage under the SWRCB's *General Permit for Discharges of Stormwater Associated with Construction Activity Construction General Permit Order 2009-0009-DWQ* (General Construction Permit). The General Construction Permit requires the project Applicant to prepare and implement a stormwater pollution prevention plan (SWPPP). The SWPPP would specify best management practices (BMPs) to be used during construction of the project to minimize or avoid water pollution, thereby reducing potential short-



term impacts to water quality. Additionally, project construction activities would be required to comply with the water quality BMPs set forth in Municipal Code Chapter 8, *Storm Water and Urban Runoff Pollution Control*, which includes conditions and requirements established to control urban pollutant runoff into the City's stormwater system.

### **Watershed Management**

Potential impacts on watershed management associated with the proposed project are analyzed in Section 4.10 of the Draft IS/MND. Specifically, as detailed on page 4.10-5 of the Draft IS/MND, the proposed project is located within the Coastal Plain of Los Angeles – West Coast groundwater basin, which is designated as a Very Low priority basin. Therefore, there is no groundwater sustainability plan established for the basin. However, the Water Replenishment District of Southern California developed the Groundwater Basins Master Plan (GBMP), which identifies projects and programs to enhance basin replenishment, increase reliability of groundwater resources, and improve and protect groundwater quality in the Los Angeles West Coast and Central groundwater basins. As the proposed project would not substantially increase water demands above existing conditions and would not substantially deplete groundwater supplies or interfere with groundwater recharge, the proposed project is not anticipated to conflict with or obstruct with the projects or programs identified in the GBMP.

### **Rare and Endangered Species**

Potential impacts on biological resources, including rare and endangered species, associated with the proposed project are analyzed in Section 4.4, *Biological Resources*, of the Draft IS/MND. Specifically, as discussed on page 4.4-1 of the Draft IS/MND, the City of Carson does not support any sensitive or special status species. Further, the project area is a built out, industrial area of the City; the project site is heavily disturbed and mostly consists of developed, bare ground, and disturbed (non-native) habitat. Thus, it is concluded that the proposed project is not anticipated to adversely impact rare and endangered species. It is acknowledged that no oak trees, which are 25 inches or more in circumference (eight inches in diameter) as measured 4.5 feet above mean natural grade, are present on-site and the proposed project would not be subject to the County Oak Tree Ordinance.

### **Vegetation**

Potential impacts on vegetation associated with the proposed project are also analyzed in Section 4.4 of the Draft IS/MND. Specifically, as discussed on pages 4.4-2 and 4.4-3 of the Draft IS/MND, project development would require the removal of all existing on-site trees, shrubs, and grasses, as well as six public street trees along West Gardena Boulevard. Removal of the public street trees would require a Tree Removal Permit. Further, the project proposes to plant 11 new street trees along the project frontage on West Gardena Boulevard. The street trees would be 24-inch box size London plane trees and would meet the planting specifications detailed in Municipal Code Sections 3905, *Planting*, 3907, *Planting and Staking*, and 3908, *Planting Specifications*. The project Applicant would be required to obtain a Tree Planting Permit prior to planting of any trees within the City's right-of-way to ensure the proposed street trees comply with the City's planning specifications and Parkway Tree Master Plan. Upon City approval of the



Tree Removal Permit and Tree Planting Permit, project implementation would not conflict with any local policies or ordinances protecting biological resources. As discussed above, it is acknowledged that no oak trees are present on-site and the proposed project would not be subject to the County Oak Tree Ordinance. **[NOTE TO MANRAJ: Confirm this statement is true.]**

In addition, as no areas within the City of Carson are located within an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan, it is concluded that project implementation would not conflict with the provisions of any such plans that would involve the protection on biological resources, including vegetation.

### **Fuel Modification for Very High Fire Hazard Severity Zones**

Potential impacts on wildfire associated with the proposed project are analyzed in Section 4.20, *Wildfire*, of the Draft IS/MND. Specifically, as discussed on page 4.20-1 of the Draft IS/MND, the City of Carson, including the project site, is not designated as a very high fire hazard severity zone. Thus, discussion on fuel modification is not required.

### **Archeological and Cultural Resources**

Potential impacts on cultural and archeological associated with the proposed project are analyzed in Section 4.5, *Cultural Resources*, of the Draft IS/MND. As detailed on pages 4.5-1 through 4.5-4 of the Draft IS/MND, none of the historic period buildings or objects within the project site are eligible for listing on the California Register of Historical Resources (CRHR); no archaeological resources were identified within or near the project site during the records search or pedestrian survey and the project site is not considered sensitive for buried archaeological resources. Nevertheless, in the unlikely event that archaeological resources are encountered during project construction, Mitigation Measure CUL-1 would require all project construction efforts to halt until an archaeologist examines the site, identifies the archaeological significance of the find, and recommends a course of action. With implementation of Mitigation Measure CUL-1, the project would not cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5 of the CEQA Guidelines.

Overall, the project's potential impacts to those topic areas acknowledged by this commenter are analyzed in the Draft IS/MND and mitigated (as needed).

- 4-4 The commenter notes that the Health Hazardous Materials Division (HHMD) would advise on adding the Los Angeles Regional Water Quality Control Board (LARWQCB) as a responsible agency for the proposed project, as the LARWQCB would be responsible for the implementation of Mitigation Measures HAZ-1, HAZ-2, and HAZ-3; refer to Section 3, *Mitigation Monitoring and Reporting Program*, of this Final IS/MND. The commenter also notes that the HHMD would advise on adding the Los Angeles Department of Public Works (LACDPW), Environmental Programs Division as a responsible agency for the proposed project, as the LACDPW would be responsible for the implementation of Mitigation Measure HAZ-6, *Vapor Barrier(s) installation*; refer to Section 3.



As indicated on Section 2.6, *Agreements, Permits, And Approvals*, of the Draft IS/MND, LARWQCB is listed as a responsible agency for the proposed project. For LACDPW HHMD, it is acknowledged that the proposed project would be required to comply with all existing Federal, State, and local laws and regulations governing hazardous materials/waste, including installation of the vapor barrier system. Currently, the LARWQCB is overseeing remediation that includes this property. The vapor barrier system is being proposed as a result of this existing groundwater contamination that has resulted from an off-site property. The applicant will install the vapor barrier system in compliance by all laws and regulations, whether the overseeing agency remain LARWQCB, or if it is deferred to the LACDPW HHMD. It is acknowledged that LACDPW HHMD could be a responsible agency regarding proposed remedial measures as a result of the proposed project.



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### **3.0 MITIGATION MONITORING AND REPORTING PROGRAM**

The California Environmental Quality Act (CEQA) requires that when a public agency completes an environmental document that includes measures to mitigate or avoid significant environmental effects, the public agency must adopt a reporting or monitoring plan. This requirement ensures that environmental impacts found to be significant will be mitigated. The reporting or monitoring plan must be designed to ensure compliance during project implementation (Public Resources Code Section 21081.6).

In compliance with Public Resources Code Section 21081.6, Table 1, *Mitigation Monitoring and Reporting Checklist*, has been prepared for the CT Warehouse Project (the “project”). This Mitigation Monitoring and Reporting Checklist is intended to provide verification that all applicable Conditions of Approval relative to significant environmental impacts are monitored and reported. Monitoring will include: 1) verification that each mitigation measure has been implemented; 2) recordation of the actions taken to implement each mitigation; and 3) retention of records in the City of Carson CT Warehouse Project file.

This Mitigation Monitoring and Reporting Program (MMRP) delineates responsibilities for monitoring the project, but also allows the City flexibility and discretion in determining how best to monitor implementation. Monitoring procedures will vary according to the type of mitigation measure. Adequate monitoring consists of demonstrating that monitoring procedures took place and that mitigation measures were implemented. This includes the review of all monitoring reports, enforcement actions, and document disposition, unless otherwise noted in the Mitigation Monitoring and Reporting Checklist (Table 1). If an adopted mitigation measure is not being properly implemented, the designated monitoring personnel shall require corrective actions to ensure adequate implementation.

Reporting consists of establishing a record that a mitigation measure is being implemented, and generally involves the following steps:

- The City distributes reporting forms to the appropriate entities for verification of compliance.
- Departments/agencies with reporting responsibilities will review the Initial Study/Mitigated Negative Declaration, which provides general background information on the reasons for including specified mitigation measures.
- Problems or exceptions to compliance will be addressed to the City as appropriate.
- Periodic meetings may be held during project implementation to report on compliance of mitigation measures.
- Responsible parties provide the City with verification that monitoring has been conducted and ensure, as applicable, that mitigation measures have been implemented. Monitoring compliance may be documented through existing review and approval programs such as field inspection reports and plan review.



- The City prepares a reporting form periodically during the construction phase and an annual report summarizing all project mitigation monitoring efforts.
- Appropriate mitigation measures will be included in construction documents and/or conditions of permits/approvals.

Minor changes to the MMRP, if required, would be made in accordance with CEQA and would be permitted after further review and approval by the City. Such changes could include reassignment of monitoring and reporting responsibilities, plan redesign to make any appropriate improvements, and/or modification, substitution, or deletion of mitigation measures subject to conditions described in CEQA Guidelines Section 15162. No changes will be permitted unless the MMRP continues to satisfy the requirements of Public Resources Code Section 21081.6.





**Table 1**  
**Mitigation Monitoring and Reporting Checklist**

Mitigation Number	Mitigation Measure	Implementation Responsibility	Timing	Monitoring Responsibility	Timing	Verification of Compliance		
						Initials	Date	Remarks
<b>4.5 CULTURAL RESOURCES</b>								
CUL-1	<u>Unanticipated Discovery of Cultural Resources.</u> If previously unidentified cultural resources are encountered during ground-disturbing activities, work in the immediate area shall halt and a qualified archaeologist, defined as an archaeologist who meets the Secretary of the Interior's Professional Qualification Standards for archaeology, shall be contacted immediately to evaluate the find. If the discovery proves to be significant under CEQA, additional work such as data recovery excavation may be warranted to mitigate any significant impacts. In the event that an identified cultural resources is of Native American origin, the qualified archaeologist shall consult with the project owner and City of Carson to implement Native American consultation procedures. Construction shall not resume until the qualified archaeologist states in writing that the proposed construction activities would not significantly damage any archaeological resources.	Construction Contractor; Qualified Archaeologist	During Ground-Disturbing Activities	City of Carson Community Development Department	During Ground-Disturbing Activities			
<b>4.7 GEOLOGY AND SOILS</b>								
GEO-1	If evidence of subsurface paleontological resources is found during construction, excavation and other construction activity in that area shall cease and the construction contractor	Construction Contractor/ Certified Paleontologist	During Ground-Disturbing Activities	City of Carson Community Development Director	During Ground-Disturbing Activities			



Mitigation Number	Mitigation Measure	Implementation Responsibility	Timing	Monitoring Responsibility	Timing	Verification of Compliance		
						Initials	Date	Remarks
	shall contact the City of Carson Community Development Director. With direction from the Community Development Director, a paleontologist certified by the County of Los Angeles shall evaluate the find prior to resuming grading in the immediate vicinity of the find. If warranted, the paleontologist shall prepare and complete a standard Paleontological Resources Mitigation Program for the salvage and curation of identified resources.							
<b>4.10 HAZARDS AND HAZARDOUS MATERIALS</b>								
HAZ-1	<u>Soil Management Plan</u> . Prior to issuance of a grading permit, a Soil Management Plan (SMP) shall be prepared by a qualified environmental professional with Phase II/Site Characterization experience. The SMP shall be made available to the contractor and the City of Carson Engineer for use during grading and excavation activities. The SMP shall include guidelines for safety measures and soil management in the event that soils are to be disturbed, and for handling soil during any planned earthwork activities. The SMP shall also include a decision framework and specific risk management measures for managing soil, including any soil import/export activities, in a manner protective of human health and consistent with applicable regulatory requirements. Should any soils be disposed of at an off-site location, the construction contractor would verify that all exported soils are not contaminated with hazardous materials above regulatory	Phase II/Site Characterization Specialist; Construction Contractor	Prior to Issuance of Grading Permit; During Grading Activities	City of Carson Engineer	Prior to Issuance of Grading Permit; During Grading Activities			



Mitigation Number	Mitigation Measure	Implementation Responsibility	Timing	Monitoring Responsibility	Timing	Verification of Compliance		
						Initials	Date	Remarks
	thresholds in consultation with a Phase II/Site Characterization Specialist. If export soils are determined to be contaminated above regulatory thresholds, the Phase II/Site Characterization Specialist would recommend proper handling, use, and/or disposal of these soils.							
HAZ-2	<u>Soil Vapor Sampling</u> . The Applicant shall retain a qualified Phase II/Site Characterization Specialist to conduct verification soil vapor sampling during any excavation activities at depth that which would present a concern to worker safety. Should any samples determine that residual contamination in soil vapor present a risk to construction workers during excavation activities, the Phase II/Site Characterization Specialist shall have the authority to either implement additional safety precautions and/or temporarily suspend construction activity at said location for the protection of workers or the public.	Project Applicant; Qualified Phase II/Site Characterization Specialist	During Grading Activities	City of Carson Community Development Department	During Grading Activities			
HAZ-3	<u>Monitoring Wells Relocation</u> . Prior to issuance of a Certificate of Occupancy, the project Applicant shall submit documentation as proof, to the Director of Community Development or City of Carson Engineer, that the closure/relocation of any monitoring wells or remedial equipment has been conducted in accordance to the standards and regulations established by the Los Angeles Regional Water Quality Control Board (RWQCB) and Los	Project Applicant	Prior to Grading Activities/ Prior to Issuance of a Certificate of Occupancy	City of Carson Community Development Department/ City of Carson Engineer/ Regulatory Agencies (e.g., Los Angeles Regional Water	Prior to Grading Activities/ Prior to Issuance of a Certificate of Occupancy			



Mitigation Number	Mitigation Measure	Implementation Responsibility	Timing	Monitoring Responsibility	Timing	Verification of Compliance		
						Initials	Date	Remarks
	Angeles County Department of Public Health Environmental Health Division (LADPH).			Quality Control Board and/or Los Angeles County Department of Public Health Environmental Health Division LADPH, as applicable)				
HAZ-4	<u>Asbestos Survey.</u> Prior to demolition activities, an asbestos survey shall be conducted by an Asbestos Hazard Emergency Response Act (AHERA) and California Division of Occupational Safety and Health (Cal/OSHA) certified building inspector to determine the presence or absence of asbestos containing-materials (ACMs). If ACMs are located, abatement of asbestos shall be completed prior to any activities that would disturb ACMs or create an airborne asbestos hazard. Asbestos removal shall be performed by a State certified asbestos containment contractor in accordance with the South Coast Air Quality Management District (SCAQMD) Rule 1403.	Qualified Building Inspector; State Certified Asbestos Containment Contractor	Prior to Demolition Activities	City of Carson Engineer	Prior to Demolition Activities			
HAZ-5	<u>Lead-Based Paint Handling.</u> If paint is separated from building materials (chemically or physically) during demolition of the structures, the paint waste shall be evaluated independently from the building material by a qualified Environmental Professional. If lead-based paint is found, abatement shall be	Qualified Environmental Professional; Qualified Lead Specialist	During Demolition Activities	City of Carson Engineer	During Demolition Activities			



Mitigation Number	Mitigation Measure	Implementation Responsibility	Timing	Monitoring Responsibility	Timing	Verification of Compliance		
						Initials	Date	Remarks
	completed by a qualified Lead Specialist prior to any activities that would create lead dust or fume hazard. Lead-based paint removal and disposal shall be performed in accordance with California Code of Regulation Title 8, Section 1532.1, which specifies exposure limits, exposure monitoring and respiratory protection, and mandates good worker practices by workers exposed to lead. Contractors performing lead-based paint removal shall provide evidence of abatement activities to the City of Carson Engineer.							
HAZ-6	<u>Vapor Barrier(s) Installation.</u> The project Applicant shall install a passive vapor barrier beneath the office portions of the future warehouse structure, where chemical concentrations were detected in excess of regulatory screening levels. Vapor barrier design activities shall be required to include consideration of the materials and methods to be used, by a qualified remediation specialist, during vapor barrier installation. The vapor barrier shall be installed prior to emplacement of concrete floor slabs and footings. For the passive vapor barrier under the office portions of the building, below-ground ventilation lines shall also be required to be constructed, prior to concrete work, such that chemical vapors would not be trapped below the concrete floor slabs. The ventilation lines shall be required to be open to the exterior of the structure, preferably at least 8 feet above the ground surface, or as	Project Applicant; Qualified Remediation Specialist	Prior to Issuance of a Grading Permit; During Construction Activities	City of Carson Community Development Department/ Regulatory Agencies (e.g., Los Angeles Regional Water Quality Control Board and/or Los Angeles County Department of Public Health Environmental Health Division LADPH, as applicable)	Prior to Issuance of a Grading Permit; During Construction Activities			



Mitigation Number	Mitigation Measure	Implementation Responsibility	Timing	Monitoring Responsibility	Timing	Verification of Compliance		
						Initials	Date	Remarks
	otherwise directed by a qualified environmental professional with Site Characterization/ Remedial experience. The remainder of the warehouse portions of the building foundation shall include appropriate vapor barrier without passive venting, as recommended by a qualified remediation specialist.							
<b>4.13 NOISE</b>								
NOI-1	<p>To reduce noise levels during construction activities, the Applicant must demonstrate, to the satisfaction of the City of Carson Community Development Director, that the project complies with the following:</p> <ul style="list-style-type: none"> <li>Construction contracts must specify that all construction equipment, fixed or mobile, shall be equipped with properly operating and maintained mufflers and other state-required noise attenuation devices.</li> <li>A sign, legible at a distance of 50 feet, shall be posted at the project construction site providing a contact name and a telephone number where residents can inquire about the construction process and register complaints. This sign shall indicate the dates and duration of construction activities. In conjunction with this required posting, a noise disturbance coordinator shall be identified to address construction noise concerns received. The coordinator shall be responsible for responding to any local complaints about construction noise.</li> </ul>	Project Applicant; Noise Disturbance Coordinator	Prior to and During Construction Activities	City of Carson Community Development Director	Prior to and During Construction Activities			



Mitigation Number	Mitigation Measure	Implementation Responsibility	Timing	Monitoring Responsibility	Timing	Verification of Compliance		
						Initials	Date	Remarks
	<p>When a complaint is received, the disturbance coordinator shall notify the City within 24 hours of the complaint and determine the cause of the noise complaint (starting too early, malfunctioning muffler, etc.) and shall implement reasonable measures to resolve the complaint, as deemed acceptable by the City. All signs posted at the construction site shall include the contact name and the telephone number for the noise disturbance coordinator.</p> <ul style="list-style-type: none"> <li>• During construction, stationary construction equipment shall be placed such that emitted noise is directed away from sensitive noise receivers.</li> <li>• Per Section 5502 (c) of the Municipal Code, construction shall be limited to the hours between 7:00 a.m. and 8:00 p.m. daily (except Sundays and legal holidays). All construction activities shall be prohibited at night (between 8:00 p.m. and 7:00 a.m.) and on Sundays and legal holidays.</li> </ul>							
NOI-2	Prior to the initiation of construction, the Applicant shall prepare a paving control plan to ensure that the paving process does not result in damage to the northern and eastern light industrial/commercial structures. The paving control plan shall be subject to the Building and Safety Department's approval prior to issuance	Project Applicant	Prior to Issuance of Grading Permit; During Construction Activities	City of Carson Engineer	Prior to Issuance of Grading Permit; During Construction Activities			



Mitigation Number	Mitigation Measure	Implementation Responsibility	Timing	Monitoring Responsibility	Timing	Verification of Compliance		
						Initials	Date	Remarks
	of a grading permit. To reduce groundborne vibration levels, the paving control plan shall stipulate that static (non-vibratory) rollers shall be used as an alternative to vibratory rollers within 15 feet of the northern and eastern industrial structures.							
<b>4.17 TRANSPORTATION</b>								
TRA-1	Prior to the initiation of construction, the project Applicant shall prepare a Traffic Management Plan (TMP) for approval by the City of Carson Traffic Engineer. The TMP shall include measures such as construction signage, limitations on timing for lane closures to avoid peak hours, temporary striping plans, and the need for a construction flagperson to direct traffic during heavy equipment use. The TMP shall specify that one direction of travel in each direction must always be maintained for W. Gardena Boulevard and Figueroa Street throughout project construction. For required lane closure along 164th Street, a flagperson must be present. The TMP shall be incorporated into project specifications for verification prior to final plan approval.	Project Applicant; Contractor	Prior to Final Plan Approval; During Construction Activities	City of Carson Traffic Engineer	Prior to Final Plan Approval; During Construction Activities			
<b>4.18 TRIBAL CULTURAL RESOURCES</b>								
TCR-1	Prior to issuance of any grading permits, the project Applicant shall be required to retain and compensate for the services of a Tribal monitor/consultant who is both approved by the Gabrieleño Band of Mission Indians-Kizh Nation Tribal Government and is listed under the	Project Applicant; Approved Tribal Monitor/Consultant; Qualified Archaeologist;	Prior to Issuance of Grading Permits; During Ground-	City of Carson Community Development Director/ County	Prior to Issuance of Grading Permits; During Ground-			





Mitigation Number	Mitigation Measure	Implementation Responsibility	Timing	Monitoring Responsibility	Timing	Verification of Compliance		
						Initials	Date	Remarks
	<p>Native American Heritage Commission's (NAHC's) Tribal Contact list for the area of the project location. This list is provided by the NAHC. The monitor/ consultant shall be present on-site during the construction phases that involves ground disturbing activities. Ground disturbing activities are defined by the Gabrieleño Band of Mission Indians-Kizh Nation as activities that may include, but are not limited to, pavement removal, pot-holing or auguring, grubbing, tree removals, boring, grading, excavation, drilling, and trenching within the project area. The Tribal Monitor/consultant shall complete daily monitoring logs that provide descriptions of the day's activities, including construction activities, locations, soil, and any cultural materials identified. The on-site monitoring shall end when the project site grading and excavation activities are completed, or when the Tribal Representatives and monitor/consultant have indicated that the site has a low potential for impacting Tribal Cultural Resources.</p> <p>Upon discovery of any tribal cultural or archaeological resources, all construction activities shall cease in the immediate vicinity of the find until the find can be assessed. All tribal cultural and archaeological resources unearthed by project construction activities shall be evaluated by the qualified archaeologist (Mitigation Measure CUL-1) and the tribal monitor/consultant. If the resources are Native</p>	Construction Contractor	Disturbing Activities	Coroner (if necessary)	Disturbing Activities			



Mitigation Number	Mitigation Measure	Implementation Responsibility	Timing	Monitoring Responsibility	Timing	Verification of Compliance		
						Initials	Date	Remarks
	<p>American in origin, the Gabrieleño Band of Mission Indians-Kizh Nation shall coordinate with the landowner regarding treatment and curation of these resources. Typically, the Tribe requests preservation in place or recovery for educational purposes. Work may continue on other parts of the project while evaluation and, if necessary, additional protective mitigation takes place (CEQA Guidelines Section 15064.5 [f]). If a resource is determined by the qualified archaeologist to constitute a “historical resource” or “unique archaeological resource” (per Mitigation Measure CUL-1), time allotment and funding sufficient to allow for implementation of avoidance measures, or appropriate mitigation, must be made available by the Applicant. The treatment plan established for the resources shall be in accordance with CEQA Guidelines Section 15064.5(f) for historical resources.</p> <p>Preservation in place (i.e., avoidance) is the preferred manner of treatment. If preservation in place is not feasible, treatment may include implementation of archaeological data recovery excavations to remove the resource along with subsequent laboratory processing and analysis. All Tribal Cultural Resources shall be returned to the Tribe. Any historic archaeological material that is not Native American in origin shall be curated at a public, nonprofit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles</p>							



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	<p>County or the Fowler Museum, if such an institution agrees to accept the material. If no institution accepts the archaeological material, they shall be offered to the Tribe or a local school or historical society in the area for educational purposes.</p> <p>Native American human remains are defined in PRC 5097.98 (d)(1) as an inhumation or cremation, and in any state of decomposition or skeletal completeness. Funerary objects, or associated grave goods defined in PRC 5097.98, are also to be treated according to this statute. Health and Safety Code 7050.5 dictates that any discoveries of human skeletal material shall be immediately reported to the County Coroner and excavation halted until the coroner has determined the nature of the remains. If the coroner recognizes the human remains to be those of a Native American or has reason to believe that they are those of a Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission (NAHC) and PRC 5097.98 shall be followed.</p> <p>Upon discovery of human remains, the tribal monitor/consultant and/or qualified archaeologist (Mitigation Measure CUL-1) shall immediately divert work at minimum of 150 feet and place an exclusion zone around the discovery location. The monitor/consultant(s) shall then notify the Tribe, the qualified lead</p>							



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	<p>archaeologist, and the construction manager who shall call the coroner. Work shall continue to be diverted while the coroner determines whether the remains are human and subsequently Native American. The discovery is to be kept confidential and secure to prevent any further disturbance. If the finds are determined to be Native American, the coroner shall notify the NAHC as mandated by state law who shall then appoint a Most Likely Descendent (MLD).</p> <p>If the Gabrieleno Band of Mission Indians – Kizh Nation is designated MLD, the Koo-nas-gna Burial Policy shall be implemented. To the Tribe, the term “human remains” encompasses more than human bones. In ancient as well as historic times, Tribal Traditions included, but were not limited to, the preparation of the soil for burial, the burial of funerary objects with the deceased, and the ceremonial burning of human remains. The prepared soil and cremation soils are to be treated in the same manner as bone fragments that remain intact. Associated funerary objects are objects that, as part of the death rite or ceremony of a culture, are reasonably believed to have been placed with individual human remains either at the time of death or later; other items made exclusively for burial purposes or to contain human remains can also be considered as associated funerary objects.</p>							



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	Archaeological and Native American monitoring and excavation during construction shall be consistent with current professional standards. All feasible care to avoid any unnecessary disturbance, physical modification, or separation of human remains and associated funerary objects shall be taken. Principal personnel must meet the Secretary of Interior standards for archaeology and have a minimum of 10 years of experience as a principal investigator working with Native American archaeological sites in southern California. The qualified archaeologist (Mitigation Measure CUL-1) shall ensure that all other personnel are appropriately trained and qualified.							



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