

**Mitigation Monitoring and Reporting Program  
Initial Study/Mitigated Negative Declaration  
Carson Lofts Apartment Project**

*Prepared for:*

**City of Carson**

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Carson, California 90745

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# 1 Introduction

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The California Environmental Quality Act (CEQA) requires that a public agency adopting a Mitigated Negative Declaration (MND) take affirmative steps to determine that approved mitigation measures are implemented after project approval. The lead or responsible agency must adopt a reporting and monitoring program for the mitigation measures incorporated into a project or included as conditions of approval. The program must be designed to ensure compliance with the MND during project implementation (California Public Resources Code, Section 21081.6(a)(1)).

This Mitigation Monitoring and Reporting Program (MMRP) will be used by the City of Carson (City) to ensure compliance with adopted mitigation measures identified in the MND for the proposed Carson Lofts Apartment Project (project) when construction begins. The City, as the lead agency, will be responsible for ensuring that all mitigation measures are carried out. Implementation of the mitigation measures would reduce impacts to below a level of significance for air quality, cultural resources, geology and soils, hazards and hazardous materials, noise, and tribal cultural resources.

The remainder of this MMRP consists of a table that identifies the mitigation measures by resource for each project component. Table 1 identifies the mitigation monitoring and reporting requirements, list of mitigation measures, party responsible for implementing mitigation measures, timing for implementation of mitigation measures, agency responsible for monitoring of implementation, and date of completion. With the MND and related documents, this MMRP will be kept on file at the following location:

City of Carson  
Planning Division  
701 East Carson Street  
Carson, California 90749

# 2 Mitigation Monitoring and Reporting Program Table

**Table 1 Mitigation Monitoring and Reporting Program**

Mitigation Measure	Implementation Timing	Party Responsible for Implementation	Party Responsible For Monitoring	Date of Completion/Notes
<b>Air Quality</b>				
<p><b>MM-AQ-1:</b> Prior to the start of construction activities, the project applicant, or its designee, shall ensure that all 75 horsepower or greater diesel-powered equipment are powered with California Air Resources Board (CARB)-certified Tier 4 Interim engines, except where the project applicant establishes to the satisfaction of the City that Tier 4 Interim equipment is not available.</p> <p>An exemption from this requirement may be granted by the City of Carson (City) if (1) the City documents equipment with Tier 4 Interim engines are not reasonably available, and (2) the required corresponding reductions in criteria air pollutant emissions can be achieved for the project from other combinations of construction equipment. Before an exemption may be granted, the construction contractor shall: (1) demonstrate that at least two construction fleet owners/operators were contacted and that those owners/operators confirmed Tier 4 Interim equipment could not be located within the City during the desired construction schedule; and (2) the proposed replacement equipment has been evaluated using California Emissions Estimator Model (CalEEMod) or other industry standard emission estimation method and documentation provided to the City to confirm that necessary project-generated emissions reductions are achieved.</p>	Prior to construction	Project applicant and their construction contractor	City of Carson	
<b>Cultural Resources</b>				
<p><b>MM-CUL-1:</b> Prior to commencement of construction activities for all phases of project implementation, the project applicant shall retain a qualified archaeologist, meeting the Secretary of the Interior’s Professional</p>	Prior to construction	Project applicant and their construction contractor	City of Carson	

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<p>Qualification Standards for Archaeology, to prepare a Worker Environmental Awareness Program (WEAP). The WEAP shall be submitted to the City for review and approval. All construction personnel and monitors who are not trained archaeologists shall be briefed regarding inadvertent discoveries prior to the start of construction activities. A basic presentation and handout or pamphlet shall be prepared in order to ensure proper identification and treatment of inadvertent discoveries. The purpose of the WEAP training is to provide specific details on the kinds of archaeological materials that may be identified during construction of the project and explain the importance of and legal basis for the protection of significant archaeological resources. Each worker shall also learn the proper procedures to follow in the event that cultural resources or human remains are uncovered during ground-disturbing activities. These procedures include work curtailment or redirection, and the immediate contact of the site supervisor and archaeological monitor.</p>				
<p><b>MM-CUL-2:</b> An on-call qualified archaeologist shall be retained to respond to and address any inadvertent discoveries identified during initial excavation in native soil. Initial excavation is defined as initial construction-related earth moving of sediments from their place of deposition. As it pertains to archaeological monitoring, this definition excludes movement of sediments after they have been initially disturbed or displaced by project-related construction. A qualified archaeological principal investigator, meeting the Secretary of the Interior’s Professional Qualification Standards, should oversee and establish monitoring efforts as needed (increase, decrease, or discontinue monitoring frequency) based on the observed potential for construction activities to encounter cultural deposits or material. The archaeological</p>	<p>Prior to and during construction</p>	<p>Project applicant and their construction contractor</p>	<p>City of Carson</p>	

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<p>monitor will be responsible for maintaining daily monitoring logs.</p> <p>In the event that potential prehistoric or historical archaeological resources (sites, features, or artifacts) are exposed during construction activities for the project, all construction work occurring within 50 feet of the find shall immediately stop and a qualified archaeologist must be notified immediately to assess the significance of the find and determine whether or not additional study is warranted. Depending upon the significance of the find, the archaeologist may simply record the find and allow work to continue. If the discovery proves significant under CEQA, additional work such as preparation of an archaeological treatment plan, testing, data recovery, or monitoring may be warranted.</p> <p>If monitoring is conducted, an archaeological monitoring report shall be prepared within 60 days following completion of ground disturbance and submitted to the City for review. This report should document compliance with approved mitigation, document the monitoring efforts, and include an appendix with daily monitoring logs. The final report shall be submitted to the City and the SCCIC.</p>				
<b>Geology and Soils</b>				
<p><b>MM-GEO-1:</b> Prior to commencement of any grading activity on-site, the applicant shall retain a qualified paleontologist meeting the requirements outlined in the Society of Vertebrate Paleontology's 2010 guidelines (SVP 2010). The qualified paleontologist shall attend the preconstruction meeting and be on-site during all rough grading and other significant ground-disturbing activities in previously undisturbed older alluvial deposits, if encountered. These deposits may be encountered at depth</p>	<p>During construction</p>	<p>Project applicant and their construction contractor</p>	<p>City of Carson</p>	



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<p>below ground surface. In the event that paleontological resources (e.g., fossils) are unearthed during grading, the paleontology monitor will temporarily halt and/or divert grading activity to allow recovery of paleontological resources. The area of discovery will be roped off with a 50-foot radius buffer. Once documentation and collection of the find is completed, the monitor will remove the rope and allow grading to recommence in the area of the find. Following construction-related earthmoving, the qualified paleontologist shall produce a final monitoring report documenting the monitoring program, including geological observations, fossil discoveries, laboratory and curatorial work, and the final disposition of the fossils.</p>				
<b>Hazards and Hazardous Materials</b>				
<p><b>MM-HAZ-1: Phase II Environmental Site Assessment and Remediation.</b> Prior to commencement of construction or excavation activities, a Phase II Environmental Site Assessment (ESA) shall be completed to properly characterize and delineate the potential impacts due to historical property use as a gas station, as well as the potential presence of other related components on site (e.g., underground storage tanks, underground piping). The Phase II ESA will be completed in accordance with the ASTM Standard E 1903-11 (ASTM 2011), and the Public Draft Supplemental Guidance for Screening and Evaluating Vapor Intrusion (DTSC 2020). The laboratory results of the Phase II ESA sampling will be compared to residential Environmental Screening Levels (ESL 2019). Should contaminants be identified that exceed the residential ESLs, remediation will be conducted to reduce contamination to acceptable levels (i.e. below the applicable ESLs) and/or engineering controls will be designed for site development to eliminate exposure to future occupants and site users. If underground storage</p>	<p>Prior to construction</p>	<p>Project applicant and their construction contractor</p>	<p>City of Carson</p>	

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<p>tanks or related appurtenances are identified, they will be removed in accordance with Los Angeles County CUPA regulations. The Phase II ESA and remediation will be completed by an environmental professional and licensed engineer or geologist. The engineering controls, if required, will be designed by an engineer licensed in the State of California in accordance with the most recent and applicable federal, state, and local laws and regulations to eliminate potential exposure to future occupants. The Phase II results, remediation results, and/or engineering control designs will be submitted to Los Angeles County and City of Carson for review and approval prior to issuance of building permits.</p>				
<p><b>MM-HAZ-2: Hazardous Materials Contingency Plan.</b> Prior to commencement of construction or excavation activities, a Hazardous Materials Contingency Plan (HMCP) shall be developed to address impacts identified during the Phase II ESA (MM-HAZ-1) that are not remediated, but instead remain on the project site, and will later be controlled using engineering controls. The HMCP shall include health and safety measures, including periodic worker breathing zone monitoring and monitoring for volatile organic compounds in accordance with SCAQMD Rule 1166, and all applicable health and safety requirements under CalOSHA. Contaminated soils removed from the project site as part of the proposed project development will be characterized, documented, and disposed of in accordance with federal, state, and local regulations related to transportation, handling, and disposal of contaminated soils.</p>	<p>Prior to construction</p>	<p>Project applicant and their construction contractor</p>	<p>City of Carson</p>	
<b>Noise</b>				
<p><b>MM-NOI-1:</b> Prior to building construction, the applicant will provide a temporary construction sound barrier wall to reduce construction-related noise to nearby sensitive receptors:</p>	<p>Prior to construction</p>	<p>Project applicant and their construction contractor</p>	<p>City of Carson</p>	

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<p>A temporary plywood barrier shall be installed to extend the top elevation of the existing, permanent 6-foot-tall masonry wall along the project's east perimeter to a minimum height of 8 feet. Additionally, a temporary construction sound barrier wall of not less than 8 feet in height shall be installed along the project's west and south perimeters. Entry gates for construction vehicles shall be closed when vehicles are not entering or exiting the site. The barrier shall be made of sound-attenuating material (not landscaping). To effectively reduce sound transmission through the barrier, the material chosen must be rigid and sufficiently dense (at least 20 kilograms per square meter). All noise barrier material types are equally effective, acoustically, if they have this density. For example, 5/8-inch plywood, mounted with no gaps between adjacent sheets, would be of sufficient density to achieve the target attenuation. The west and south perimeter barriers shall be 8 feet in height from the ground surface on the construction side of the wall to achieve the goal of blocking direct line-of-sight to the adjacent residence windows.</p>				
<p><b>MM-NOI-2:</b> At least 20 days prior to commencement of construction, the contractor shall provide written notice to all residential property owners and tenants within 300 feet of the project site that proposed construction activities could affect outdoor or indoor living areas. The notice shall contain a description of the project, a construction schedule including days and hours of construction, and a description of noise-reduction measures.</p>	<p>Prior to construction</p>	<p>Project applicant and their construction contractor</p>	<p>City of Carson</p>	
<p><b>MM-NOI-3:</b> Noise-generating construction activities (which may include preparation for construction work) shall be permitted weekdays between 7:00 a.m. and 6:00 p.m., excluding Sundays and federal holidays. When a holiday falls on a Saturday or Sunday, the preceding Friday or</p>	<p>During construction</p>	<p>Project applicant and their construction contractor</p>	<p>City of Carson</p>	

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following Monday, respectively, shall be observed as a legal holiday.				
<b>MM-NOI-4:</b> Stationary construction equipment that generates noise that exceeds 85 dBA at the property boundaries shall be shielded with a barrier that meets a Sound Transmission Class rating of 25.	During construction	Project applicant and their construction contractor	City of Carson	
<b>MM-NOI-5:</b> All construction equipment powered by internal combustion engines shall be properly muffled and maintained. No internal combustion engine shall be operated on the site without a muffler. All diesel equipment shall be operated with closed engine doors and shall be equipped with factory recommended mufflers. Unnecessary idling of internal combustion engines shall be prohibited.	During construction	Project applicant and their construction contractor	City of Carson	
<b>MM-NOI-6:</b> Air compressors and generators used for construction shall be surrounded by temporary acoustical shelters. Whenever feasible, electrical power shall be used to run air compressors and similar power tools.	During construction	Project applicant and their construction contractor	City of Carson	
<p><b>MM-NOI-7: Exterior-to-Interior Noise Level Limit:</b> Interior noise levels within the project's dwelling units shall not exceed 45 community noise equivalent level (CNEL).</p> <p>An acoustical analysis report, prepared by an acoustical engineer, shall be submitted describing the acoustical design features of the structure that will satisfy the interior noise standard as part of the building plan check. Once specific building plan information is available, additional exterior-to-interior acoustical analysis shall be conducted for the residences facing both S Main Street and E 213th Street where exterior noise levels are expected to exceed 60 CNEL to demonstrate that interior levels will not exceed 45 CNEL. The information in the analysis shall include wall heights and lengths, room volumes, window and door tables typical for a building plan, as well as information on</p>	During operation	Project applicant	City of Carson	

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<p>any other openings in the building shell. With this specific building plan information, the analysis shall determine the predicted interior noise levels at the planned on-site buildings. If predicted noise levels are found to be in excess of 45 CNEL, the report shall identify architectural materials or techniques that could be included to reduce noise levels to 45 CNEL in habitable rooms. Standard measures such as glazing with appropriate Sound Transmission Class (STC) ratings should be considered. The residential units shall be constructed in compliance with all noise attenuation measures required by the report.</p> <p>In addition, appropriate means of air circulation and provision of fresh air shall be provided to allow windows to remain closed for extended intervals of time so that acceptable interior noise levels can be maintained. The mechanical ventilation system shall meet the criteria of The International Building Code (Chapter 12, Section 1203.3 of the 2001 California Building Code).</p>				
<b>Tribal Cultural Resources</b>				
<p>NOTE: For purposes of proper implementation of the following mitigation measures, the term “Consulting Tribe/s” is defined pursuant to PRC 21080.3.1 as California Native American tribes that are traditionally and culturally affiliated with the geographic area of the Project site that may have expertise concerning their tribal cultural resources AND have requested and participated in formal AB 52 consultation for the Project.</p> <p><b>MM-TCR-1: Workers Environmental Awareness Program.</b> All Consulting Tribes shall be notified by the applicant/owner/developer of the time and location of the Worker Environmental Awareness Program (WEAP) training no later than 72 hours prior to its scheduled occurrence. The applicant/owner/developer shall provide all Consulting</p>	During construction	Project applicant and their construction contractor	City of Carson	

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Tribes access and opportunity to participate in the WEAP training. Further details and requirements pertaining to the WEAP training, please see MM-CUL-1.				
<p><b>MM-TCR-2: Retention of a Native American Monitoring.</b>            Prior to any ground disturbance activities, the applicant/owner/developer shall contact all Consulting Tribes with notification of the approximate commencement of ground disturbing activities. The applicant/owner/developer shall make arrangements with the Consulting Tribes to enter into a Native American Monitoring Agreement with the intent of securing a total of one Native American monitor (from any Tribe under contract) to be present during initial ground disturbance occurring from 1 foot above native soils and below. Initial ground disturbance is defined as initial construction-related earthmoving of sediments from their place of deposition. As it pertains to cultural resource (archaeological or Native American) monitoring, this definition excludes movement of sediments after they have been initially disturbed or displaced by current Project-related construction. The timing of when cultural resource monitoring (archaeological and Native American) shall be required shall be outlined in the Cultural Resource Monitoring and Inadvertent Discovery Plan pursuant to MM-CUL-1. The Plan will be provided to each Consulting Tribe under contract prior to commencement of ground disturbing activities. More than one monitor may be required if multiple areas within the Project site are simultaneously exposed to initial ground disturbance causing monitoring to be hindered by the distance (more than 100 feet apart) of the simultaneous activities. If more than one of the Consulting Tribes would like to serve as a contracted monitoring entity, each Consulting Tribe will be retained under contract with the applicant/owner/</p>	Prior to and during construction	Project applicant and their construction contractor	City of Carson	

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<p>developer and monitoring will occur on a nonsynchronous, rotational basis allowing each Consulting Tribe the opportunity to monitor as equally as possible based on the construction schedule and availability of each Consulting Tribe’s monitors.</p>				
<p><b>MM-TCR-3: Inadvertent Discovery Clause.</b> In the event that potential prehistoric or historic-era Native American/Tribal resources (sites, features, or artifacts) are exposed during construction activities for the project, all construction work occurring not less than 50 feet of the find shall immediately stop and all Consulting Tribes must be notified immediately and be consulted with throughout the assessment of the find and determination of whether or not additional study is warranted. Depending upon the nature of the discovery, the archaeologist may simply record the find and allow work to continue. If the discovery proves potentially significant under CEQA, additional work such as subsurface testing may be warranted. If the discovery is determined significant under CEQA and avoidance is not feasible, data recovery will be required. In the event that human remains and associated funerary objects are inadvertently encountered during construction activities, the remains and funerary objects shall be treated in accordance with state and local regulations that provide requirements with regard to the accidental discovery of human remains, including California Health and Safety Code Section 7050.5, California Public Resources Code Section 5097.98, and CEQA Guidelines Section 15064.5(e). In accordance with these regulations, if human remains are found, the County Coroner must be immediately notified of the discovery. Additionally, all Consulting Tribes must be notified of the discovery immediately. No further excavation or disturbance of the Project site or any nearby (no less than 100 feet) area reasonably suspected to overlie adjacent remains can</p>	<p>During construction</p>	<p>Project applicant and their construction contractor</p>	<p>City of Carson</p>	

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<p>occur until the County Coroner has determined, within 2 working days of notification of the discovery, if the remains are potentially human in origin. If the County Coroner determines that the remains are, or are believed to be, Native American, he or she is required to notify the NAHC within 24 hours. The NAHC must immediately notify those persons it believes to be the most likely descendant from the deceased Native American. The most likely descendant must then complete their inspection within 48 hours of being granted access to the site. The most likely descendant would then determine, in consultation with the property owner, the disposition and treatment of the human remains.</p>				



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