

## CITY OF CARSON

### Scoping Report for the Shell Oil Products U.S.

#### Carson Revitalization Project Specific Plan Environmental Impact Report

**Introduction:** This summary provides an overview of the written and verbal comments received during the scoping process for the Environmental Impact Report (EIR) for the Shell Carson Revitalization Project (CRP) Specific Plan (Specific Plan). The purpose of this report is to summarize agency and public comments, issues, and concerns identified during the scoping process. This report will be used by the City of Carson to determine the appropriate scope of issues for the Specific Plan EIR.

**Project Description:** The Specific Plan establishes land use designations and policy for the Project site. The Specific Plan provides a bridge between the Carson General Plan and individual development applications in the Specific Plan area, applying and adding greater specificity to the policies and concepts of the General Plan for the Project site. The Project site is approximately 448 acres in size, is known as the Shell Carson Distribution Facility, and is currently being used for tank product storage and distribution, as well as chemical plant operations, related office facilities and support activities. The Specific Plan provides land use and infrastructure planning for the East and West Distribution Facilities as well as the Revitalization Areas within the Project site.

The Specific Plan proposes the expansion of the Shell Distribution Facility uses. Redevelopment of the Project site could result in a maximum development of approximately 83,000 square feet of retail and 1.74 million square feet of mixed industrial and business services, including a municipal services yard and warehousing/distribution facilities. This is 1.58 million square feet more non-residential uses than currently exist on site. Upon full redevelopment of the site, areas designated as general open space and areas of landscaping would account for approximately eight percent of the total site acreage. The expansion of overall distribution facilities storage and loading capacity is proposed to occur in the West Distribution Facility. The East Distribution Facility storage and loading capacity remains substantially unchanged, but the utilization of that capacity would change.

**Notification of EIR Scoping:** On October 6, 2010, a Notice of Preparation (NOP) was issued for the Specific Plan EIR. Recipients include the State Clearinghouse, elected officials, local, regional, and State agencies, the Daily Breeze newspaper, residents within 500 square feet of the project site and the interested public. The NOP included a project description, potential environmental impacts of the project, discretionary approvals by the City of Carson necessary for adoption of the proposed Specific Plan, availability of the Initial Study (IS), points of contact for additional information regarding the Project, and the date and location of the scoping meeting. The documents also indicated the end of the public comment period for the Specific Plan EIR as November 5, 2010.

The IS prepared for the proposed Specific Plan EIR was available for review at the City of Carson Planning Division and online at the City of Carson website (now moved to [http://ci.carson.ca.us/content/department/eco\\_dev\\_service/planning.asp](http://ci.carson.ca.us/content/department/eco_dev_service/planning.asp)). The IS determined that environmental issue areas that could be potentially affected by the proposed Specific Plan include the following: Aesthetics, Air Quality, Biological Resources, Cultural Resources, Geology/Soils, Greenhouse Gas

Emissions, Hazards/Hazardous Materials, Hydrology/Water Quality, Land Use/Planning, Noise, Public Services, Transportation/Traffic, and Utilities/Service Systems. These issue areas will be addressed in the Specific Plan EIR.

**Verbal Public Scoping Comments:** A public scoping meeting was held by the City of Carson on the evening of October 20, 2010, at the Carson Community Center, 801 East Carson Street, Carson, CA 90745. Agencies, organizations, interested parties, and the public were welcome to attend and present information that they believe should be addressed in the Specific Plan EIR. Two members of the community attended the scoping meeting and provided verbal comments. These comments are summarized as follows:

Ray Park, Member of the City of Carson Environmental Quality Commission

- Concerned that the proposed Project would increase truck trips in the Project site. Requested that impacts resulting from the increase in truck traffic and revised circulation be disclosed in the EIR.

Skip Grantham, Resident

- Requested weed abatement in the Project site. Stated that disking of vegetation in the Project site causes the inhabiting mice to disperse into the surrounding neighborhoods. In addition, gophers that burrow in the Project site affect the adjacent neighborhood. These issues create health concerns, and Mr. Grantham suggested that development could eliminate these issues.
- Stated that the visual quality of the Project site is currently neglected. Requested that the visual quality be enhanced as part of the proposed Project, including the tanks.
- Requested disclosure of proposed site screening, security and access provisions.
- Requested disclosure of traffic and circulation impacts on Martin Street.
- Requested to include a dog park as part of the proposed Project.

**Written Public Scoping Comments:** Written comments regarding the potential environmental impacts of the proposed project in response to the IS/NOP were accepted by the City during a 30-day public review period. Seven comment letters were received during the public review period. These comments are summarized as follows:

Governor's Office of Planning and Research (OPR), State Clearinghouse and Planning Unit (dated October 7, 2010)

- Letter encouraged other responsible agencies to provide comments on the scope and content of the NOP. No comments directly related to impacts of the proposed Project were included in this letter.

Department of Transportation (Caltrans), District 7, Regional Planning (dated October 27, 2010)

- Requested that City of Carson prepare a traffic study prior to the Draft EIR. In addition, Caltrans requested to meet with City of Carson and traffic consultants to identify study locations and discuss potential traffic impacts to the States facilities and possible mitigations measures prior to the preparation of the EIR.

- Concerned about queuing of vehicles using off-ramps that will back into the mainline through lanes. Recommended that the City of Carson determine whether Project related plus cumulative traffic is expected to cause long queues on the on and off-ramps.
- Concerned regarding the consistency of project travel modeling with other regional and local modeling forecasts and with travel data. Stated that any inconsistencies must be thoroughly explained in the traffic study.
- Stated that the traffic study would need to provide analysis of the ADT, AM and PM peak-hour volumes for both the existing and future conditions in the affected area. Included that estimates for the utilization of transit and of all facilities need to be realistic. In addition, stated that future conditions need to include build-out of all projects and any plan-horizon years.
- Requested that the traffic study provide inclusion of all appropriate traffic volumes. Requests that analysis should include existing traffic, traffic generated by the Project, cumulative traffic generated from all specific approved development in the area, and traffic growth other than from the Project and developments.
- Stated that mitigation measures appropriate to alleviate anticipated traffic impacts must be included in the EIR. Requested that mitigation discussion should include, but not be limited to the following: description of transportation infrastructure improvements; financial costs, funding sources and financing; sequence and scheduling consideration; and implementation responsibilities, controls and monitoring. Requested that any mitigation involving transit or Transportation Demand Management (TDM) be justified and conservatively estimated. Stated that improvements involving dedication of land or physical construction maybe favorably considered.
- Stated that Caltrans may accept fair share contribution toward pre-established or future improvements on the State Highway System. Provided guidelines to determine Project equitable share responsibility and methods for traffic volume forecast.
- Requested that the select zone model be performed in order to determine the appropriate scope. In addition, provided a reminder that Caltrans has authority to determine the required freeway analysis for the Project and is responsible for obtaining measures to off-set Project vehicle trip generation that worsens State Highway facilities.

#### Native American Heritage Commission (NAHC) (dated October 28, 2010)

- NAHC provided three contacts for consultation with California Native American tribes. According to Government Code §65352.3, -.4, and -.5, consultation with California Native American tribes identified by the NAHC is required in order to protect and/or mitigate impacts to cultural places that might be impacted by the implementation of the proposed Project. (Consultation is underway.)
- Recommended that City of Carson conduct a record search through the NAHC and California Historic Resources Information System (CHRIS) to determine if there are any recorded archaeological sites located with the Project area.

- Based on the NAHC Sacred Lands File search, no Native American cultural resources were identified within the Area of Potential Effect (APE); however, records searches do not preclude the existence of sacred sites or a cultural place. NAHC suggested consultation with identified Native American tribes as the best method to determine if the proposed Project may impact Native American cultural resources.

State of California Public Utilities Commission (CPUC) (dated November 1, 2010)

- Stated that CPUC has jurisdiction over the safety of highway-rail crossings in California and has exclusive power on the design, alteration, and closure of crossing. CPUC approval is required for construction or alteration of crossings.
- Concerned that new developments may increase traffic volumes at at-grade high-way crossings in addition to streets and intersections. Requested that the City of Carson add language to the revitalization plan so that any development adjacent to or near railroad right-of-way is planned with the safety of rail corridor in mind. The language should also consider pedestrian circulation patterns/destination with respect to railroad right-of-way.
- Requested that language should be in place so that any traffic impact studies undertaken should also address traffic increase impacts over affected crossings and associated proposed mitigation measures.
- Recommended that mitigation measures include, but not be limited to, the planning for grade separations for major thoroughfares; improvements to existing at-grade highway-rail crossings due to increase in traffic volumes; continuous vandal resistant fencing; or other appropriate barriers to limit access of trespassers onto the railroad right-of-way.

County Sanitation Districts of Los Angeles County (Districts) (dated November 4, 2010)

- Stated that an Industrial Wastewater Discharge permit might be required for the proposed Project. Recommended that the Project developers contact the District to determine if a permit is required. If a permit is necessary, copies of the final plans and supporting information for the proposed Project will be required to be submitted to the District for review and approval prior to project construction.
- Provided information that the wastewater flow originating from the proposed Project will discharge to a local sewer line, which is not maintained by the District, for conveyance to either or both the District's Del Amo Trunk Sewer, located in Del Amo Boulevard at Tillman Avenue, or the Wilmington Avenue Trunk Sewer, located in Martin Street at Carson Street. The 24-inch diameter Del Amo Trunk Sewer has a design capacity of 3.7 million gallons per day (mgd) and conveyed a peak flow of 1.3 mgd when last measured in 2008. The 27-inch diameter Wilmington Avenue Trunk Sewer has a design capacity of 6.9 mgd and conveyed a peak flow of 1.0 mgd when last measured in 2008.
- Provided information that the wastewater generated by the proposed Project will be treated at the Joint Water Pollution Control Plant located in the City of Carson, which has a design capacity of 400 mgd and currently processes an average flow of 280.5 mgd.

- In order to estimate the volume of wastewater generated by the proposed Project, provided information regarding Districts' average wastewater generation factors available online.
- Stated that the Districts are authorized by the California Health and Safety Code to charge a fee for the privilege of connecting (directly or indirectly) to the Districts' Sewerage System or increasing the strength or quantity of wastewater attributable to a particular parcel or operation already connected. This connection fee is a capital facilities fee that is imposed in an amount sufficient to construct an incremental expansion of the Sewage System to accommodate the proposed Project. Payment of a connection fee will be required before a permit to connect to the sewer is issued.
- Stated that the design capacities of the District's water treatment facilities are based on the regional growth forecast adopted by the Southern California Association of Government (SCAG), in order to conform to the requirements of the Federal Clean Air Act (CAA). All expansions of District facilities must be sized and services phased in a manner that will be consistent with the SCAG regional growth forecast for the Counties of Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial. The available capacity of the District treatment facilities will, therefore, be limited to levels associated with the approved growth identified by SCAG. In addition, stated that the comment letter does not constitute a guarantee of wastewater service, but the District intends to provide service up to the levels that are legally permitted.

County of Los Angeles Sheriff's Department (CoLASD) (dated November 4, 2010)

- Stated that facility security is not an issue. However, concerned that the Project might impact major roads adjacent to the Project and increase traffic. This could delay LASD's response times to emergencies in the area. The LASD reserves the right to further address this issue in the subsequent review of the Draft EIR.
- Enclosed a comment letter, dated October 21, 2010, from Captain Bernice Abram of the Carson Station of the LASD which expresses the same concern over the issue of delayed response times to emergencies in the area.

Southern California Edison Company (SCE) (dated November 5, 2010)

- Stated that any proposed use of SCE right-of-ways are reviewed on a case-by-case basis by SCE's Operating Department. Requested that in the event that the proposed Project is expected to impact the SCE facilities or its land related rights, six sets of Project plans depicting SCE's facilities and its associated land rights to be submitted to the SCE Real Properties Department. Approval will be based upon review of maps provided by the developer and compatibility with SCE right-of-way constraints and rights.
- Stated that if the proposed Project results in the need to build new or relocate existing SCE electrical facilities that operate at or above 50kv, the SCE construction may have environmental consequences subject to CEQA review as required by the CPUC. If the environmental consequences are identified and addressed by the local agency in the CEQA process for the larger Project, SCE may not be required to pursue a later, separate, mandatory CEQA required thought he CPUC's General Order 131-D (Go 131-D) process. If the SCE facilities are not adequately addressed in the CEQA review

for the proposed Project, and new facilities could result in significant environmental impacts, the required additional CEQA review at the CPUC could delay approval of the SCE power line portion of the Project for two years or longer.

Curtis Jenkins, Thoth Equities, LLC (dated November 10, 2010)

- Concerned over environmental protection and social economic impacts to his business which involves community programs for children with developmental disabilities. The business is located on 20920 Chico Street, adjacent to the proposed Project site.
- Concerned over current and future property value impact to his business due to the proposed Project.
- Requested information regarding existing soil contamination, and pipeline location and depth.
- Requested information regarding the Project design plans and if his property would be considered in the plans.
- Requested information regarding underground parking and if it's part of the proposed Project.
- Requested to have input on the fencing and gateway between his property and the proposed Project.
- Requested information regarding Tank E-10. Would tank E-10 be removed or the fence removed to create a buffer facade? Are there plans for landscaping to make Tank E-10 less obvious?
- Requested information regarding project timeline and start date.
- Requested to work together to promote community acceptance.

County of Los Angeles Fire Department (CoLAFD) (dated November 17, 2010)

- Stated Fire Station 10 located at 1860 E. Del Amo in Carson has inadequate storage area to secure the necessary equipment and foam needed to response to incidents at the Shell facility. Offered two solutions: 1) a short term solution - for Shell to lease land to CoLAFD at no cost; 2) a permanent solution - for Shell to convey land to CoLAFD.
- Stated that development of the Project must comply with all applicable code and ordinance requirements for construction, access, water mains, fire flows and fire hydrants.
- Stated that every building constructed has to be accessible to CoLAFD apparatus by way of access roadways, with an all-weather surface of not less than the prescribed width. The roadway need to 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
- Stated that fire sprinkler systems are required in some residential and most commercial occupancies. Suggested that for those occupancies not required to have fire sprinklers should still be installed with a fire sprinkler systems.

- Stated that the development may require fire flows up to 5,000 gallons per minute at 20 pounds per square inch residual pressure for up to a five-hour duration. Final fire flows will be based on the size of buildings, its relationship to other structures, property lines, and types of construction used.
- Stated that fire hydrant spacing need to be 300 feet and also need to meet the following requirements:
  - No portion of lot frontage shall be more than 200 feet via vehicular access from a public fire hydrant.
  - No portion of a building shall exceed 400 feet via vehicular access from a properly spaced public fire hydrant.
  - Additional hydrants will be required if hydrant spacing exceeds specified distances.
  - When cul-de-sac depth exceeds 200 feet on a commercial street, hydrants shall be required at the corner and mid-block.
  - A cul-de-sac shall not be more than 500 feet in length, when serving land zoned for commercial use.
- Stated that turning radii cannot be less than 32 feet and need to be determined at the centerline of the road. A CoLAFD approved turning area is to be provided for all driveways exceeding 150 feet in length and at the end of all cul-de-sacs.
- Stated that all on-site driveways/roadways are to provide a minimum unobstructed width of 28 feet, clear-to-sky. The on-site driveways need to be within 150 feet of all portions of the exterior walls of the first story of any building. The centerline of the access driveway need to be located parallel to, and within 30 feet of an exterior wall on one side of the proposed structure.
- Stated that driveway width for non-residential developments need to be increased when any of the following conditions exist:
  - Provide 34 feet in width, when parallel parking is allowed on one side of the access roadway/driveway. Preference is that such parking is not adjacent to the structure.
  - Provide 42 feet in width, when parallel parking is allowed on each side of the access roadway/driveway.
  - Any access way less than 34 feet in width shall be labeled “fire Lane” on final recording map, and final building plans.
  - For streets or driveways with parking restrictions: The entrance to the street/driveway and intermittent spacing distance of 150 feet shall be posted with CoLAFD approved signs stating “NO PARKING- FIRE LANE” in three-inch high letters. Driveway labeling is necessary to ensure access for Fire Department use.
- Stated that all access devices and gates need to meet the following requirements:

- Any single gated opening used for ingress and egress need to be a minimum of 26 feet in width, clear-to sky.
  - Any divided gate opening (when each gate is used for a single direction of travel i.e., ingress or egress) need to be a minimum width of 20 feet clear-to-sky.
  - Gates and/or control devices shall be positioned a minimum of 50 feet from a public right-of-way, and need to be provided with a turnaround having a minimum of 32 feet of turning radius. If an intercom system is used, the 50 feet need to be measured from the right-of-way to the intercom control device.
  - All limited access devices shall be of a type approved by the CoLAFD.
  - Gate plans need to be submitted to the CoLAFD, prior to installation. These plans need show all locations, widths and details of the proposed gates.
- Stated that disruption to water services are to be coordinated with the CoLAFD and alternate water sources are to be provided for fire protection during such disruptions.
  - Stated specific fire and life safety requirements and conditions set during the environmental review process will be addressed and conditions set at the building and fire plan check phase. Once the official plans are submitted for review then there may be additional requirements that must have adherence for the project to move forward. The suggested requirements provided so far are only general requirements.
  - Stated that the Projects must comply with requirements regarding construction, water mains, access, fire flows and hydrant requirements. These requirements need to be incorporated into the Project proposal.
  - Stated that statutory responsibilities for the CoLAFD Land Development Unit include the review of, and comment on, all projects within the unincorporated areas of the County of Los Angeles with the emphasis of the following: availability of sufficient water supplies for fire fighting operations and local/regional access issues; issues that may have a significant impact on the CoLAFD; review of all projects within Contract Cities (Cities that contract with the CoLAFD for fire protection services); all County facilities, located within non-contract Cities; conditions that may be imposed on a project by the Fire Prevention Division, which may create a potentially significant impact to the environment. Provided contact information for any questions regarding subdivision, water systems, or access issues.
  - Stated that statutory responsibilities for the CoLAFD, Forestry Division include the erosion control, watershed management, rare and endangered species, vegetation, fuel modification for Very High Fire Hazard Severity Zones or Fire Zone 4, archeological and cultural resources, and the County Oak Tree Ordinance. Requested that potential impacts in these areas should be addressed in the Draft Environmental Impact Report.
  - Stated that the Initial Study identified the Project site as a listed site with Cal EPA and under a Cleanup and Abatement Order by State Water Resources Control Board. Stated that the State Water



Resources Control Board and the Los Angeles Regional Water Quality Control Board agencies should be notified and an approval obtained prior to any modification to the Project site.

Department of Toxic Substances Control (DTSC) (dated November 29, 2010)

- Requested that the EIR evaluate whether conditions within the Project area may pose a threat to human health or the environment. Provided list of databases of some regulatory agencies for resource.
- Stated that the EIR should identify the mechanism to initiate any required investigation and/or remediation for any site within the proposed Project area that maybe contaminated, and the government agency to provide appropriate regulatory oversight.
- Stated that any environmental investigations, sampling and/or remediation for a site should be conducted under a Workplan approved and overseen by a regulatory agency that has jurisdiction to oversee hazardous substance cleanup. The findings of any investigations, including any Phase I or II Environmental Site Assessment Investigations should be summarized in the document. All sampling results in which hazardous substance were found above regulatory standards should be clearly summarized in a table. All closure, certification or remediation approval reports by regulatory agencies should be included in the EIR.
- Stated that if buildings, other structures, asphalt or concrete-paved surface areas are being planned to be demolished, an investigation should also be conducted for the presence of other hazardous chemicals, mercury, and asbestos containing materials (ACMs). If other hazardous chemicals, lead-based paints (LPB) or precuts, mercury or ACMs are indentified, proper precautions should be taken during demolition activities. Additionally, the contaminants should be remediated in compliance with California environmental regulations and policies.
- Stated that sampling may be required for future project construction may require soil excavation or filling in certain areas. If soil is contaminated, it must be properly disposed and not simply placed in another location onsite. Land Disposal Restrictions (LDRs) may be applicable to such soils. In addition, if the Project proposes to import soil to backfill the areas excavated, sampling should be conducted to ensure that the imported soil is free of contamination.
- Stated that human health and the environment of sensitive receptors should be protected during any construction or demolition activities. If necessary, a health risk assessment overseen and approved by the appropriate government agency should be conducted by a qualified health risk assessor to determine if there are, have, or will be, any releases of hazardous materials that may pose a risk to human health or the environment.
- Stated that if the site was used for agricultural, livestock or related activities, onsite solids and groundwater might contain pesticides, agricultural chemical, organic waste or other related residue. Proper investigation, and remedial actions, if necessary, should be conducted under the oversight of and approved by a government agency at the site prior to construction of the project.
- Stated that if it is determined that hazardous wastes are, or will be, generated by the proposed operations, the wastes must be managed in accordance with the California Hazardous Waste Control

Law (California Health and Safety Code, Division 20, Chapter 6.5) and the Hazardous Waste Control Regulations (California Code of Regulations, Title 22, Division 4.5). If proposed Project generates hazardous wastes then the facility should also obtain a United States Environmental Protection Agency (U.S. EPA) Identification Number. Provided contact information for U.S. EPA.

- Stated that certain hazardous waste treatment processes or hazardous materials, handling, storage or uses may require authorization from the local Certified Unified Program Agency (CUPA). Provided resource for CUPA information.
- Stated that DTSC could provide cleanup oversight through an Environmental Oversight Agreement (EOA) for government agencies that are not responsible parties or a Voluntary Cleanup Agreement (VCA) for private parties. Provided contact and resource information for more information on EOA and VCA.