



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
4.5 CULTURAL RESOURCES								
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			
4.7 GEOLOGY AND SOILS								
GEO-1	If evidence of subsurface paleontological resources is found during construction, excavation and other construction activity in	Construction Contractor/ Certified	During Ground-Disturbing Activities	City of Carson Community Development	During Ground-Disturbing Activities			



Mitigation	Mitigation Measure	Implementation	Timing	Monitoring	Timing	Verification of Compliance		
	that area shall cease and the construction contractor 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.	Paleontologist		Director				
4.10 HAZARDS AND HAZARDOUS MATERIALS								
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	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	Mitigation Measure	Implementation	Timing	Monitoring	Timing	Verification of Compliance			
	are not contaminated with hazardous materials above regulatory 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 Angeles County Department of Public	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 Quality Control	Prior to Grading Activities/ Prior to Issuance of a Certificate of Occupancy				



Mitigation	Mitigation Measure	Implementation	Timing	Monitoring	Timing	Verification of Compliance		
	Health Environmental Health Division (LADPH).			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 completed by a qualified Lead Specialist prior to any activities that would create lead dust or	Qualified Environmental Professional; Qualified Lead Specialist	During Demolition Activities	City of Carson Engineer	During Demolition Activities			



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	<p>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.</p>							
HAZ-6	<p><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 otherwise directed by a qualified environmental professional with Site Characterization/ Remedial experience. The</p>	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			



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	remainder of the warehouse portions of the building foundation shall include appropriate vapor barrier without passive venting, as recommended by a qualified remediation specialist.								
4.13 NOISE									
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"> • 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. • 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. When a complaint is received, the disturbance coordinator shall 	Project Applicant; Noise Disturbance Coordinator	Prior to and During Construction Activities	City of Carson Community Development Director	Prior to and During Construction Activities				



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	<p>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"> • During construction, stationary construction equipment shall be placed such that emitted noise is directed away from sensitive noise receivers. • 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. 							
NOI-2	<p>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 of a grading permit. To reduce groundborne vibration levels, the paving control plan shall stipulate that static (non-vibratory) rollers shall</p>	Project Applicant	Prior to Issuance of Grading Permit; During Construction Activities	City of Carson Engineer	Prior to Issuance of Grading Permit; During Construction Activities			



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	be used as an alternative to vibratory rollers within 15 feet of the northern and eastern industrial structures.							
4.17 TRANSPORTATION								
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			
4.18 TRIBAL CULTURAL RESOURCES								
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 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	Project Applicant; Approved Tribal Monitor/Consultant; Qualified Archaeologist; Construction Contractor	Prior to Issuance of Grading Permits; During Ground-Disturbing Activities	City of Carson Community Development Director/ County Coroner (if necessary)	Prior to Issuance of Grading Permits; During Ground-Disturbing Activities			



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	<p>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 American in origin, the Gabrieleño Band of Mission Indians-Kizh Nation shall coordinate with the landowner regarding treatment and curation of these resources.</p>							



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	<p>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 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</p>							



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	<p>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 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</p>							



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	<p>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> <p>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</p>							



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	<p>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.</p>							



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