

APPENDIX C

RESPONSE TO COMMENTS RECEIVED ON THE DRAFT NEGATIVE DECLARATION FOR THE SHIPPERS TRANSPORT EXPRESS CONTAINER STORAGE PROJECT

APPENDIX C

FINAL NEGATIVE DECLARATION

SHIPPERS TRANSPORT EXPRESS CONTAINER STORAGE PROJECT

COMMENTS AND RESPONSES TO COMMENTS

This Appendix, together with other portions of the Negative Declaration, constitutes the Final Negative Declaration (ND) for the proposed Shippers Transport Express Container Storage Project.

The Draft ND was circulated for a 20-day public review and comment period beginning on November 7, 2019 and ending November 26, 2019. The Draft is available at the City of Carson City Hall, 701 East Carson Street, Carson, California 90745 or by calling at (310) 952-1761, ext. 1317.

The Draft ND contained a detailed project description, an analysis of the environmental impacts of all environmental resources included on the CEQA checklist, including cumulative impacts, and other areas of discussion as required by CEQA.

The City received one comment letter on the Draft ND during the public comment period. The comment letter and responses to the comments raised in that letter are provided in this appendix. The comments are bracketed and numbered. The related responses are identified with the corresponding number and are included following each comment letter.

COMMENT LETTER NO. 1

Shine Ling
Los Angeles County Metropolitan Transportation Authority
November 26, 2019



Metro

Los Angeles County
Metropolitan Transportation Authority

One Gateway Plaza
Los Angeles, CA 90012-2952

213.922.2000 Tel
metro.net

November 26, 2019

Max Castillo
City of Carson
Community Development Department
701 East Carson Street
Carson, CA 90745
Sent by Email: mcastill@carson.ca.us

RE: 2149 East Sepulveda Boulevard Project – Negative Declaration

Dear Mr. Castillo:

Thank you for coordinating with the Los Angeles County Metropolitan Transportation Authority (Metro) regarding the proposed Shipper's Transport Express (Project) located at 2149 East Sepulveda Boulevard in the City of Carson (City). Metro is committed to working with local municipalities, developers, and other stakeholders across Los Angeles County on transit-supportive developments to grow ridership, reduce driving, and promote walkable neighborhoods. Transit Oriented Communities (TOCs) are places (such as corridors or neighborhoods) that, by their design, allow people to drive less and access transit more. TOCs maximize equitable access to a multi-modal transit network as a key organizing principle of land use planning and holistic community development.

1-1

The purpose of this letter is to provide the City with recommendations on topics regarding the Project's potential impacts on the Metro bus facilities and services, which should be included in the Negative Declaration (ND). Effects of a project on transit systems and infrastructure are within the scope of transportation impacts to be evaluated under CEQA (CEQA Guidelines section 15064.3 (a)).

In addition to the specific comments outlined below, Metro would like to provide the City with the Metro Adjacent Development Handbook (attached), which provides an overview of common concerns for development adjacent to Metro right-of-way (ROW) and transit facilities, available at www.metro.net/projects/devreview/.

1-2

Project Description

The Project is adjacent to Metro bus facilities and services and includes relocating a portion of an existing container storage site to a new site for the temporary storage of containers delivered to the Port of Long Beach, prior to delivery to their ultimate destination.

1-3

Comments

Bus Stop Adjacency

1. **Service:** Metro Bus Line 202 operates on Alameda Street, adjacent to the Project. One Metro Bus stop is directly adjacent to the Project at Alameda Street and East Sepulveda Boulevard. Other transit operators may provide service in this area and should be consulted.
2. **Impact Analysis:** With an anticipated increase in traffic during and after Project construction, the ND should analyze potential effects on Metro Bus service and identify mitigation measures

1-4

RESPONSE TO COMMENTS RECEIVED ON THE DRAFT NEGATIVE DECLARATION

2149 E. Sepulveda Blvd.
Negative Declaration – Metro Comments
November 26, 2019

or project design features as appropriate. Potential impacts may include construction traffic, operation of and shipment/deliveries to the completed Project, and temporary or permanent bus service rerouting.

1-4
cont'd

3. Final Bus Stop Condition: The existing Metro bus stop must be maintained as part of the final Project. During construction, the stop must be maintained or relocated consistent with the needs of Metro Bus operations. Final design of the bus stop and surrounding sidewalk area must be ADA-compliant and allow passengers with disabilities a clear path of travel to the bus stop from the proposed development.
4. Driveways: Driveways accessing parking and loading at the Project site should be located away from the transit stop on Alameda Street, and be designed and configured to avoid potential conflicts with on-street transit services and pedestrian traffic to the greatest degree possible. Vehicular driveways should not be located in or directly adjacent to areas that are likely to be used as waiting areas for transit.
5. Bus Stop Access & Enhancements: Metro encourages the installation of bus shelters with benches, wayfinding signage, enhanced crosswalks and ramps compliant with the Americans with Disabilities Act (ADA), as well as pedestrian lighting and shade trees in paths of travel to access bus stops and other amenities that improve safety and comfort for transit riders. The City should consider requesting the installation of such amenities as part of the Project.
6. Bus Operations Contacts: Please contact Metro Bus Operations Control Special Events Coordinator at 213-922-4632 and Metro's Stops and Zones Department at 213-922-5190 with any questions and at least 30 days in advance of initiating construction activities. Other municipal bus services may also be impacted and should be included in construction outreach efforts.

1-5

1-6

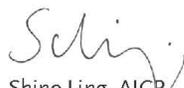
1-7

1-8

If you have any questions regarding this response, please contact me by phone at 213-922-2671, by email at LingS@metro.net, or by mail at the following address:

Metro Development Review
One Gateway Plaza MS 99-22-1
Los Angeles, CA 90012-2952

Sincerely,



Shine Ling, AICP
Manager, Transit Oriented Communities

Attachments and links:

- Adjacent Development Handbook: <https://www.metro.net/projects/devreview/>

RESPONSE TO COMMENT LETTER NO. 1

Response 1-1

The City appreciates the comments from the Los Angeles County Metropolitan Transportation Authority (LA Metro) and information on Transit Oriented Communities. This comment is an introductory comment and does not provide specific comments on the Negative Declaration so no further response is required.

Response 1-2

The City appreciates the Metro Adjacent Development Handbook. As explained further below, no additional development is proposed as part of the project.

Response 1-3

The City recognizes that Metro Bus Line operates on Alameda Street. The Metro bus stop near the project site at 2149 East Sepulveda Boulevard is located adjacent to an equipment yard that is not part of the project. No other transit operators are known to operate near the project area. The City of Carson provides local bus services through the Carson Circuit, but mostly near residential areas. The project is not located along one of the Carson Circuit routes.

Response 1-4

As discussed in the Draft Negative Declaration (see page 1-4), Shippers is moving its existing truck and container storage from 1150 E. Sepulveda Boulevard to 2149 East Sepulveda Boulevard. The existing Metro bus stop is not located adjacent to the project site, but is located adjacent to an existing Equipment Yard that is not part of the project (see Negative Declaration, Figure 1-2, Page 1-6). Further, no major renovations or construction activities are required as part of the Shippers Project. Construction activities will be limited to the installation of four modular enclosures (which are portable structures that will be moved on to the site). Shippers will also install wheel stops and K rail to provide temporary container storage areas. Construction traffic is expected to be limited to three trucks per day. The construction activities will remain onsite and have no impact on adjacent areas. There will be no need to relocate the existing Metro bus stop on a temporary or permanent basis.

As described in the Negative Declaration (see page 1-2), the project site at 2149 East Sepulveda Boulevard has been used for truck parking as recently as 2016 and most recently for the staging of construction equipment for the Tesoro Refinery. These activities have occurred without any impact to bus service in the area.

Also, as noted in the Negative Declaration under Transportation (see pages 2-57 through 2-61, and Appendix A), the project will generate less traffic than is currently generated by Shippers at its existing 1150 E. Sepulveda Boulevard 60 acre site because the proposed site at 2149 E. Sepulveda Boulevard is much smaller (20 acres) and cannot store as many containers.

Therefore, the project is expected to result in a reduction in vehicle miles travelled of approximately 1,400 miles per day in the local vicinity.

Response 1-5

The project will have no impact on the existing Metro bus stop and the existing bus stop is adjacent to an Equipment Yard that is not part of the project. All project modifications will occur onsite and there will be no changes to the bus stop, surrounding sidewalk area or any other offsite areas.

Response 1-6

As discussed in the Negative Declaration, the site will be accessed from an existing entrance on Sepulveda Boulevard and the entrance is located about one-quarter mile east of the East Sepulveda Boulevard/Alameda Street intersection. All trucks will access the site using the Terminal Island Freeway so trucks entering the facility will not pass through the Sepulveda Boulevard/Alameda Street intersection. Further, the Sepulveda Boulevard entrance is grade separated from Alameda Street. Therefore, the driveway entrance will have no impact on the existing Metro bus stop.

Trucks leaving the facility will use the exit driveway on Alameda Street, which is located about 500 feet north of the existing Metro bus stop. Trucks are required to exit the facility and turn right (north) on Alameda Street in the opposite direction of the existing Metro bus stop. Therefore, the driveways will not be adjacent to areas used as waiting areas for transit. Further, due to the industrial nature of the area, little pedestrian traffic occurs in the project area.

Response 1-7

As stated above, the project will have no impact on the existing Metro bus line and all existing features of the bus stop will remain unchanged due to project activities.

Response 1-8

As discussed above, the project does not have any construction activities that would impact any municipal bus service in the vicinity of the project. As stated above, the project site at 2149 East Sepulveda Boulevard has been used for truck parking as recently as 2016 and most recently for the staging of construction equipment for the Tesoro Refinery. These activities have occurred without any impact to bus service in the area. The City appreciates the additional information provided by LA Metro.