



CITY OF CARSON

PLANNING COMMISSION STAFF REPORT

PUBLIC HEARING: March 22, 2016
SUBJECT: Design Overlay Review No. 1584-15
APPLICANT: Dave O. Roberts
343 Third Street #103
Laguna Beach, CA 92651
REQUEST: To construct modifications to an existing
96,000 square-foot building and associated site
improvements
PROPERTY INVOLVED: 24200 S. Main Street

COMMISSIONERS' VOTE

AYE	NO		AYE	NO	
		Chairman Diaz			Mitoma
		Vice-Chairman Madrigal			Pimentel
		Andrews			Post
		Fe'esago, Jr.			Thomas
		Guidry			

I. Introduction

Applicant

Dave Roberts, 343 Third Street, #103, Laguna Beach, CA 92651;

Property Owner

Los Angeles County Sanitation District, 24501 S. Figueroa Street Carson, CA 90745

Project Address

24200 S. Main Street, Carson, CA 90745

Project Description

The applicant requests approval of Design Overlay Review No. 1584-15 to construct exterior and interior building modifications as well as site improvements. The existing building is being remodeled from a warehouse and associated offices to accommodate a manufacturing business that builds customized chassis for utility trucks. The site improvements include construction of a 539 space parking lot and lighting, 8-foot tall concrete block wall, wrought iron fence along northern and southern property lines, landscape buffer adjacent to the homes to the east, as well as front yard and parking lot area landscaping.

Current Improvements

A luggage company occupied the existing 96,000-square-foot building and used it as warehouse office space for their operations. A parking lot is located within the front portion of the subject property. The rear portion of the property is undeveloped and surrounds a separate, unrelated parcel occupied with a small oil well operation.

Previous Discretionary Permits

None .

Public Safety Issues

There is no open code enforcement case for the subject property.

Project Site and Surrounding Land Uses

The following provides a summary of the site information:

Site Information	
General Plan Land Use	Light Industrial
Zone District	ML-D
Site Size	9.78 acres
Present Use and Development	Luggage Business office and storage use within an existing warehouse building.
Surrounding Uses/Zoning	North: Large Commercial Shopping Center zoned CG-D South: Industrial Uses zoned ML-D East: Mid-century single-family homes zoned RS West: Sanitation District No. 8 zoned MH and MH-D
Access	Ingress/Egress: Main Street

II. Analysis

Business Operations

Royal Truck Body was founded in 1971 and is currently headquartered in Paramount, California. The company manufactures and distributes customized utility trucks. Royal Truck currently staffs 126 employees. The office hours are Monday-Friday from 6:00 a.m. to 6:00 p.m. The manufacturing operations occur between Monday-Saturday from 6:00 a.m. to 2:30 p.m. As business improves, the applicant proposes to extend manufacturing operations from 2:30 p.m. to 1:00 a.m.

Initially staff was concerned that the noise of the manufacturing operations would adversely affect the nearby residential neighborhood to the east. However, after reviewing the results of the noise study (see below), and considering the installation of the 8-ft wall, 10-ft landscape buffer, and the 500-foot separation between the manufacturing building and the homes, staff determined that the business operations would not introduce a nuisance to the neighborhood. Moreover, the business operations would be required to comply with the Noise Ordinance at all times any violation would be subject to code enforcement.

Building and Architecture

The existing industrial building was built in 1977. The applicant proposes to upgrade the existing building by re-painting it with the same paint colors.

To accommodate the manufacturing operations, the applicant proposes to install two new 10'x12' dock high door openings on the south (side) wall and two new 12'x14' roll-up door openings on the east (rear) wall. In addition, a compressor shed, regenerative thermal oxidizer system, and a patio cover for car wash use will be installed at the rear of the building.

Community Meeting

On October 2, 2016, the applicant hosted a community meeting at Carriage Crest Park. Invitations were mailed to the properties located within a 500-foot radius of the subject site. Five residents attended the meeting and discussed the project proposal, rear wall design, and the business operations.

Landscaping

The new landscape areas at the front, parking lot area, and along rear property line include a combination of trees, shrubs and groundcovers. At the rear property line, the wall and landscaping provides additional screening in order to minimize potential visual, lighting, and sound impacts to the adjacent residential neighborhood. The landscape plan will be refined during plan check to maximize the screening potential with the assistance of the City's landscape architect.

Lighting

New light standards are proposed throughout the rear parking lot. The light poles nearest to the adjacent residential properties will have light shields to prevent illumination spillage. (Exhibit No. 4)

Access and Parking

The 7,283-square-foot office area requires 24 parking spaces, the proposed 43,830-square-foot warehouse area requires 29 parking spaces, and the 45,570-square-foot manufacturing area requires 91 parking spaces. The applicant is proposing 162 parking spaces which exceed the CMC requirement of 135 spaces by 27 spaces.

The project also includes 2 new double-body (12'x55') truck parking spaces within the front area of the lot and 539 storage stalls for parking of customized pick-up truck chassis (10' x 20') and utility work trucks located in the rear of the property.

The City Traffic Engineer and the Los Angeles County Fire Department reviewed the proposed project circulation for public safety concerns and determined that the project's proposed circulation provides safe vehicular ingress/egress.

Signage

The buildings signage shall comply with the CMC 9136.7 signs requirements. All building signs shall be approved by Planning Division staff prior to building occupancy.

Issues

None

III. Environmental Review

Phase 1 Environmental Site Assessment:

April 2014, a Phase I Environmental Site Assessment Report was conducted and prepared by Leymaster Environmental Consulting, LLC. Leymaster Environmental concluded no evidence of environmental conditions were associated with the subject property. (Exhibit No. 5)

Air Quality :

The project includes the installation of a Regenerative Thermal Oxidizer (RTO). According to Jon Gypsyn of Gyant Compliance, the environmental permits have been approved by the South Coast Air Quality Management District (SCAQMD) with all operational permit conditions. He states that there is a 100% Permanent Total Enclosure (PTE) efficiency performance, meaning no release of volatile organic compounds (VOC) and hazardous air pollutants (HAP). The RTO with the Rotary Wheel Concentrator are continuously monitored 24/7 to confirm 95% reduction of emissions. As such, the project does not result in any increased frequency or severity of existing air quality violation standards or delay the timely attainment of air quality standards specified in the Air Quality Management Plan used by the South Coast Air Quality Management District. (Exhibit No. 6).

Noise:

The manufacturing operation is proposed within an existing concrete tilt-up industrial building which is located about 500 feet from the adjacent residential properties. An Acoustical Report was prepared by Roger C. Noppe of Purcell + Noppe + Associates, Inc. in October 2015. It was concluded that the proposed operations would result in noise exposure conditions at the adjacent properties that would be in conformance with the requirements of the City's Noise Ordinance. (Exhibit No. 7)

Pursuant to Section 15301 (Existing Facilities) of the California Environmental Quality Act (CEQA), the proposed modifications to the existing warehouse exterior and interior conversion to a manufacturing and office use with related site reasonably falls within this exemption category and no foreseeable significant impacts would result.

IV. Public Notice

Public notice was posted to the project site on March 2, 2016. Notices were mailed to the property owners and occupants within 500 feet by March 10, 2016. The agenda was posted at City Hall 72 hours prior to the Planning Commission meeting.

V. Recommendation

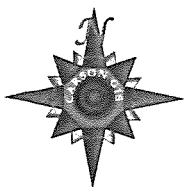
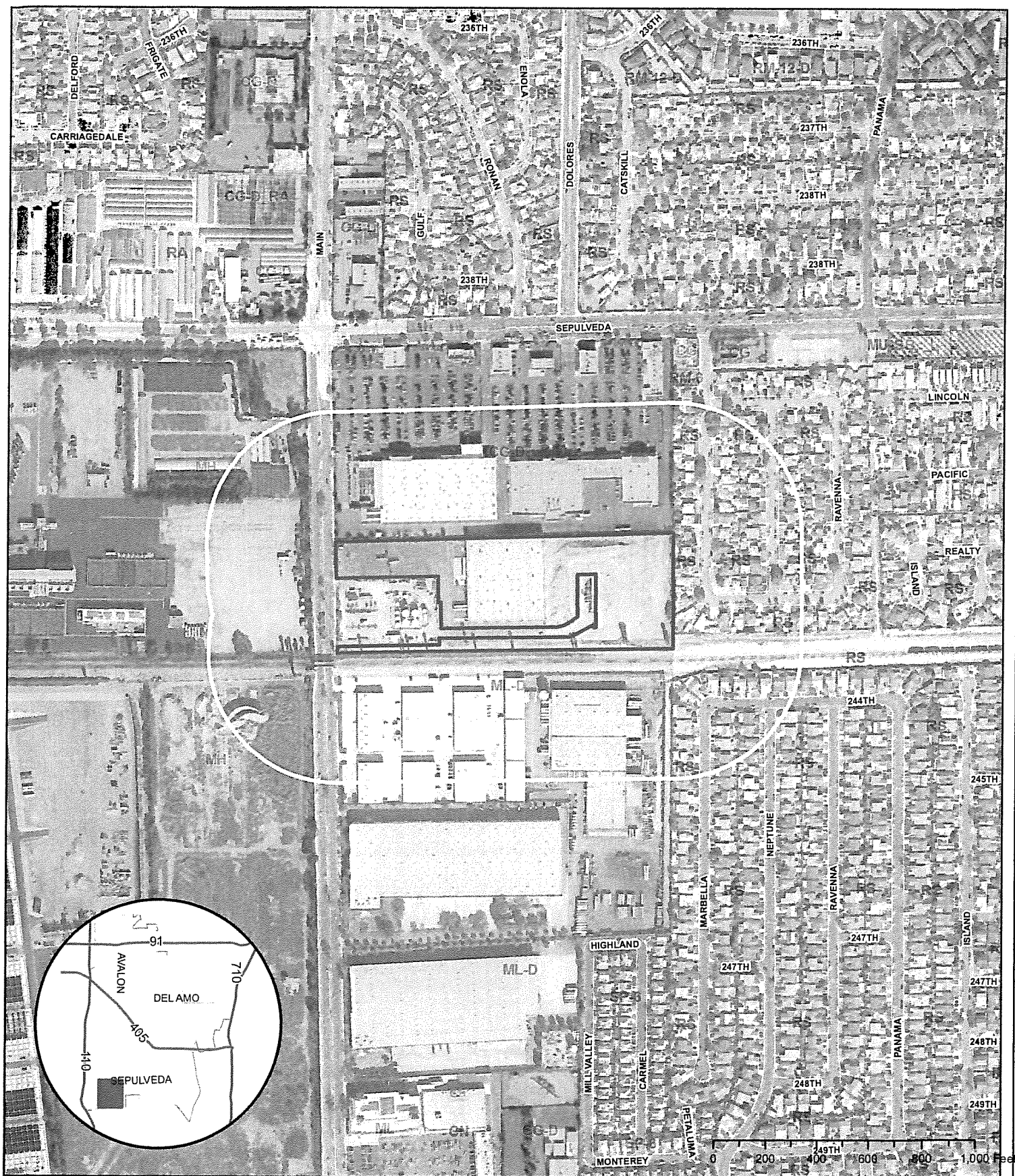
That the Planning Commission:

- **WAIVE** further reading;
- **APPROVE** the proposed project subject to the conditions of approval attached as Exhibit “B” to the Resolutions; and **ADOPT** Resolution No._____, entitled “A RESOLUTION OF THE PLANNING COMMISSION OF THE CITY OF CARSON APPROVING DESIGN OVERLAY REVIEW NO. 1584-15 TO CONSTRUCT MODIFICATIONS TO AN EXISTING 96,000 SQUARE-FOOT BUILDING AND ASSOCIATED SITE IMPROVEMENTS FOR A PROPERTY LOCATED AT 24200 S. MAIN STREET.”

VI. Exhibits

1. Site Map
2. Draft Resolution
3. Applicant’s Operations Statement
4. Light Standard Analysis prepared by David O. Roberts dated March 2, 2016
5. Phase 1 Environmental Site Assessment prepared by Leymaster Environmental Consulting, LLC dated April 22, 2014.
6. Regenerative Thermal Oxidizer Air Quality Analysis prepared by Jon Gypsyn of Gyant Compliance dated March 12, 2016.
7. Acoustical Report prepared by Roger C. Noppe dated October 2, 2015
8. Images of Royal Truck customized utility trucks
9. Development Plans under separate cover

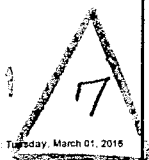
Prepared by: McKina Alexander, Associate Planner



City of Carson
500 Foot Radius Map
24200 S. Main Street

EXHIBIT NO. 01

Date Printed: Tuesday, March 01, 2016



CITY OF CARSON
PLANNING COMMISSION
RESOLUTION NO.

A RESOLUTION OF THE PLANNING COMMISSION OF THE CITY OF CARSON APPROVING DESIGN OVERLAY REVIEW NO. 1584-15 TO CONSTRUCT MODIFICATIONS TO AN EXISTING 96,000 SQUARE-FOOT BUILDING AND ASSOCIATED SITE IMPROVEMENTS FOR A PROPERTY LOCATED AT 24200 S. MAIN STREET

THE PLANNING COMMISSION OF THE CITY OF CARSON, CALIFORNIA, HEREBY FINDS, RESOLVES AND ORDERS AS FOLLOWS:

Section 1. An application was duly filed by the applicant, David O. Roberts, with respect to real property located at 24200 S. Main Street, and described in Exhibit "A" attached hereto, requesting the following:

- Design Overlay Review No. 1584-15 to construct modifications to an existing 96,000 square-foot building and associated site improvements within the ML-D (Manufacturing, Light – Design Overlay) zoning district.

A Planning Commission public hearing meeting was duly held on March 22, 2016, at 6:30 P.M. at City Hall, Helen Kawagoe Council Chambers, 701 East Carson Street, Carson, California. A notice of time, place and purpose of the aforesaid meeting was duly given.

Section 2. Evidence, both written and oral, was duly presented to and considered by the Planning Commission at the aforesaid meeting.

Section 3. In regards to Section 9172.23, "Site Plan and Design Review," the Planning Commission finds that:

a) The proposed use and development is consistent with the General Plan, which designates the subject property for Light Industrial use. The proposed manufacturing business of customizing utility trucks and outside storage of the work trucks are permitted uses within the ML-D (Manufacturing, Light) zoning district and consistent with the General Plan Land Use designation.

b) The project is compatible with the architecture and design of existing and anticipated development in the area, including site planning, land coverage, landscaping, appearance, scale of structures and open space because the new tenant plans to occupy the existing industrial building that was constructed in 1977. The building will be re-painted to upgrade the exterior appearance.

c) The project site is proposing adequate parking spaces and circulation will be provided to assure the convenience and safety of pedestrians and vehicles. The Traffic Engineer has determined that the access, circulation and proposed parking areas are satisfactory and able to accommodate safe vehicle movements. The project site has direct access to South Main Street.

d) All proposed signage associated with this project will comply with the Carson Municipal Code provisions and will be reviewed and approved by the Planning Division prior to building occupancy.

e) All of the required findings pursuant to Section 9172.23, "Site Plan and Design Review," Approval Authority and Findings and Decision" can be made in the affirmative.



Section 4. Pursuant to Section 15301 (Existing Structures or Facilities) of the California Environmental Quality Act (CEQA) Guidelines, the project is categorical exempt. The proposed project reasonably falls within this exemption category and no foreseeable significant impacts would result. As such, the Planning Commission hereby approves the Categorical Exemption.

Section 5. Based on the aforementioned findings, the Commission hereby approves Design Overlay Review No. 1584-15 with respect to the property described in Section 1 hereof, subject to the conditions set forth in Exhibit "B" attached hereto.

Section 6. The Secretary shall certify to the adoption of the Resolution and shall transmit copies of the same to the applicant.

Section 7. This action shall become final and effective fifteen days after the adoption of this Resolution unless within such time an appeal is filed with the City Clerk in accordance with the provisions of the Carson Zoning Ordinance.

PASSED, APPROVED AND ADOPTED THIS 22nd DAY OF MARCH, 2016

CHAIRPERSON

ATTEST:

SECRETARY



EXHIBIT A**LEGAL DESCRIPTION**

THE LAND REFERRED TO HEREIN BELOW IS SITUATED IN THE COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AND IS DESCRIBED AS FOLLOWS:

PARCEL A:

PARCELS 11 AND 12 OF PARCEL MAP NO. 24965 IN THE CITY OF CARSON, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS SHOWN ON A MAP FILED IN BOOK, 289 PAGES 81 TO 87, INCLUSIVE, OF PARCEL MAPS, COUNTY OF LOS ANGELES, CALIFORNIA, BUT EXCLUDING THE FOLLOWING PARCELS DESCRIBED BELOW, AND AS OTHERWISE PROVIDED IN THE LONG FORM LEASE

DRILL SITE NO. 1 PARCEL

BEGINNING AT THE POINT OF INTERSECTION OF A LINE PARALLEL WITH AND 140.00 FEET NORTHERLY OF, MEASURED AT RIGHT ANGLES, THE SOUTHERLY LINE OF SAID LINCOLN SCHOOL TRACT, AND A LINE PARALLEL WITH AND 50.00 FEET EASTERLY OF, MEASURED AT RIGHT ANGLES, THE WESTERLY LINE OF SAID LINCOLN SCHOOL TRACT, THENCE NORTHERLY ALONG SAID LAST MENTIONED PARALLEL LINE NORTH 00°40'24" WEST A DISTANCE OF 235.02 FEET, THENCE NORTH 89°59'30" EAST A DISTANCE OF 379.08 FEET; THENCE SOUTH 00°49'58" EAST A DISTANCE OF 100.00 FEET; THENCE NORTH 89°59'31" EAST A DISTANCE OF 20.00 FEET, THENCE SOUTH 00°49'58" EAST A DISTANCE OF 125.03 FEET, THENCE NORTH 88°35'49" EAST A DISTANCE OF 0.29 FEET; THENCE SOUTH 00°40'24" EAST A DISTANCE OF 25.00 FEET, THENCE SOUTH 89°59'30" WEST A DISTANCE OF 250.00 FEET, THENCE NORTH 00°40'24" WEST A DISTANCE OF 15.00 FEET: THENCE SOUTH 89°59'30" WEST A DISTANCE OF 150.00 FEET TO THE POINT OF BEGINNING.

DRILL SITE NO. 2 PARCEL

BEGINNING AT THE SOUTHEASTERLY CORNER OF LOT 2, AS SHOWN ON MAP FILED IN BOOK 6, PAGE 5, OF RECORD OF SURVEYS, IN THE OFFICE OF SAID RECORDER; THENCE SOUTH 89°59'30" WEST A DISTANCE OF 356.04 FEET; THENCE NORTH 00°50'56" WEST A DISTANCE OF 225.95 FEET TO THE TRUE POINT OF BEGINNING, THENCE NORTH 00°50'55" WEST A DISTANCE OF 150.02 FEET, THENCE NORTH 89°59'30" EAST A DISTANCE OF 70.00 FEET; THENCE SOUTH 00°50'56" EAST A DISTANCE OF 150.02 FEET; THENCE SOUTH 89°59'30" WEST A DISTANCE OF 70.00 FEET TO THE TRUE POINT OF BEGINNING.

PARCEL B:

A WATER LINE EASEMENT OVER PARCELS 1 AND 7 AND A TEMPORARY EASEMENT FOR FIRE HYDRANT OVER PARCEL 1 OF PARCEL MAP NO. 24965, FILED IN BOOK 289, PAGES 81 THROUGH 87, INCLUSIVE OF PARCEL MAPS, AS SET FORTH IN THE AGREEMENT ENTITLED "AGREEMENT BETWEEN LESSEES IN INTEREST OF ADJOINING PROPERTY" AND RECORDED OCTOBER 1, 1999, AS INSTRUMENT NO. 99-882815, OFFICIAL RECORDS.

CITY OF CARSON
COMMUNITY DEVELOPMENT DEPARTMENT
PLANNING DIVISION
EXHIBIT "B"
CONDITIONS OF APPROVAL

DESIGN OVERLAY REVIEW NO. 1584-15

GENERAL CONDITIONS

1. If a building permit for Design Overlay Review No. 1584-15 is not issued within one year of their effective date, said permit shall be declared null and void unless an extension of time is previously approved by the Planning Commission.
2. The approved Resolution, including the Conditions of Approval contained herein, and signed Affidavit of Acceptance, shall be copied in their entirety and placed directly onto a separate plan sheet behind the cover sheet of the development plans prior to Building and Safety plan check submittal. Said copies shall be included in all development plan submittals, including any revisions and the final working drawings.
3. The applicant shall submit two complete sets of plans that conform to all the Conditions of Approval to be reviewed and approved by the Planning Division prior to the issuance of a building permit.
4. The applicant shall comply with all city, county, state and federal regulations applicable to this project.
5. The applicant shall make any necessary site plan and design revisions to the site plan and elevations approved by the Planning Commission in order to comply with all of the conditions of approval and applicable Zoning Ordinance provisions. Substantial revisions will require review and approval by the Planning Commission. Any revisions shall be approved by the Planning Division prior to Building and Safety plan check submittal.
6. The applicant and property owner shall sign an Affidavit of Acceptance form and submit the document to the Planning Division within 30 days of receipt of the Planning Commission Resolution.
7. Decision of the Planning Commission shall become effective and final 15 days after the date of its action unless an appeal is filed in accordance with Section 9173.4 of the Zoning Ordinance.
8. A modification of the conditions of this permit, including additions or deletions, may be considered upon filing of an application by the owner of the subject



property or his/her authorized representative in accordance with Section 9173.1 of the Zoning Ordinance.

9. It is further made a condition of this approval that if any condition is violated or if any law, statute ordinance is violated, this permit may be revoked by the Planning Commission or City Council, as may be applicable; provided the applicant has been given written notice to cease such violation and has failed to do so for a period of thirty days.
10. The approved Resolution, including the Conditions of Approval contained herein and signed Affidavit of Acceptance, shall be copied in their entirety and placed directly onto a separate plan sheet behind the cover sheet of the development plans prior to Building and Safety plan check submittal. Said copies shall be included in all development plan submittal, including any revisions and the final working drawings.
11. **Precedence of Conditions.** If any of the Conditions of Approval alter a commitment made by the applicant in another document, the conditions enumerated herein shall take precedence unless superseded by a Development Agreement, which shall govern over any conflicting provisions of any other approval.
12. **City Approvals.** All approvals by City, unless otherwise specified, shall be by the department head of the department requiring the condition. All agreements, covenants, easements, deposits and other documents required herein where City is a party shall be in a form approved by the City Attorney. The Developer shall pay the cost for review and approval of such agreements and deposit necessary funds pursuant to a deposit agreement.
13. **Indemnification.** The Applicant shall defend, indemnify and hold harmless the City of Carson, its agents, officers, or employees from any claims, damages, action, or proceeding against the City or its agents, officers, or employees to attack, set aside, void or annul, or in any way related to the approval of the City, its advisory agencies, appeal boards, or legislative body concerning Design Overlay Review No. 1584-15. The applicant shall provide a deposit in the amount of 100 percent of the City's estimate, in its sole and absolute discretion, of the cost of litigation, including the cost of any award of attorney's fees, and shall make additional deposits as requested by the City to keep the deposit at such level. The City may ask for further security in the form of a deed of trust to land of equivalent value. If the applicant fails to provide or maintain the deposit, the City may abandon the action and the applicant shall pay all costs resulting therefrom and the City shall have no liability to the applicant.

AESTHETICS

14. Texture treatment (such as rough stucco, sandblasting, etc.) shall be incorporated into building facades, subject to the Planning Division approval.



15. There shall be no deviation of architectural design or details from the approved set of plans. Any alteration shall be first approved by the Planning Division.
16. Prior to Issuance of Building Permit, the specification of all colors and materials must be submitted and approved by the Planning Division.
17. The proposed project site shall be maintained free of debris, litter and inoperable vehicles at all times. The subject property shall be maintained to present an attractive appearance to the satisfaction of the Planning Division.

FENCE/WALLS

18. **The proposed wrought iron black gates shall conform to emergency access requirements of the Los Angeles County Fire Department.**
19. **Prior to issuance of Certificate of Occupancy, the applicant shall construct an 8-foot high masonry wall at the east property line and shall obtain approval from the Carson Building and Safety Division prior to issuance of building permits.**

GRAFFITI

20. The applicant shall incorporate additional landscaping to screen and block specific project areas that could be subject to graffiti, as determined by the Planning Division.
21. Graffiti shall be removed from all project areas within three (3) days of written notification by the City of Carson. Should the graffiti problem persist more than twice in any calendar year, the matter may be brought before the Planning Commission for review and further consideration of site modifications (i.e., fencing, landscaping, chemical treatment, etc.).

LANDSCAPE/IRRIGATION

22. The applicant shall submit two sets of landscaping and irrigation plans drawn, stamped, and signed by a licensed landscape architect. Such plans are to be approved by the Planning Division prior to the issuance of any building permit.
23. Comply with the provisions of Section 9168 of the Zoning Ordinance, "Water Efficient Landscaping."
24. Landscaping shall be provided with a permanently installed, automatic irrigation system and operated by an electrically-timed controller station set for early morning or late evening irrigation.

LIGHTING

25. Onsite lighting shall conform to the requirements of the Carson Municipal Code and shall be directed downward and inward so as not to cause light and glare impacts onto adjacent properties.
26. Light shields will be installed to further prevent illumination spillage onto adjacent residential properties.

PARKING

27. The required parking shall meet all applicable standards as outlined in the Carson Municipal Code.
28. All parking areas and driveways shall remain clear. No encroachment into parking areas and/or driveways shall be permitted.
29. Compact spaces shall be properly designated pursuant to Section 9162.43 of the Zoning Ordinance.
30. Parking spaces shall be provided with perimeter guards as provided in Section 9162.55 of the Zoning Ordinance.
31. Parking spaces shall be identified (marked) as provided in Section 9162.56 of the Zoning Ordinance.
32. ADA parking areas shall comply with the requirements of Section 9162.42 of the Zoning Ordinance.
33. All areas used for movement, parking, loading, or storage of vehicles shall be paved and in accordance with Section 9162.0 of the Zoning Ordinance.

SIGNAGE

34. All signage shall comply with the requirements of the Carson Municipal Code and shall be approved by the Planning Division prior to building occupancy.

TRASH

35. Trash collection shall comply with the requirements of the City's trash collection company.
36. Trash and recycling enclosure design shall comply with the Carson Municipal Code.

UTILITIES

37. All utilities and aboveground equipment shall be constructed and located pursuant to Section 9146.8 of the Zoning Ordinance, unless otherwise provided for in these conditions.
38. Public utility easements shall be provided in the locations as required by all utility companies with easements free and clear of obstructions, and electrical utilities shall be installed underground.
39. Any aboveground utility cabinet or equipment cabinet shall be screened from the public right-of-way by a decorative block wall or landscaping, to the satisfaction of the Planning Division.

MISCELLANEOUS

40. Manufacturing hours of operation shall be 6:00 a.m. to 2:30 p.m.; and the rear yard hours of operation shall be 8:00 a.m. to 5:00 p.m.
41. All manufacturing operations shall be conducted within the building.
42. The applicant shall provide copies of all permits from the other agencies prior to occupancy of the site.

BUILDING AND SAFETY DIVISION

43. Obtain all appropriate building permits and an approved final inspection for the proposed project.
44. All building improvements shall comply with the Building and Safety Division requirements.

ENGINEERING SERVICES DEPARTMENT

45. Any existing off-site improvements damaged during the construction shall be removed and reconstructed per City of Carson standard plan and to the satisfaction of the City Engineer.
46. A construction permit is required for any work to be done in the public right-of-way.
47. If applicable, a construction bond for all work to be done within the public-right-of way shall be submitted and approved by Engineering Services.

Prior to Issuance of Building Permit

48. Provide proof of Worker's Compensation and Liability Insurance.

PUBLIC WORKS – WATER QUALITY

Prior to issuance of Building Permit

49. Per City of Carson Ordinance 5809, the developer shall comply with all applicable Low Impact Development (LID) requirements and shall include Best Management Practices necessary to control storm water pollution from construction activities and facility operations to the satisfaction of the City of Carson Engineer.
50. Developer shall provide the contact information of the Qualified Storm Water Developer (QSD) and/or Qualified Storm Water Pollution Prevention Plan (SWPP) Developer of the site.

Prior to Issuance of Certificate of Occupancy

51. For any structural and/or treatment control device installed, the Developer shall record a maintenance covenant pursuant to Section 106.4.3 of the County of Los Angeles Building Code and Title 12, Chapter 12.80 of the Los Angeles County Code relating to the control pollutants carried by storm water runoff.
52. Attach an exhibit that identifies any structural and/or treatment control device installed and include any maintenance bmp device specifications.

FIRE DEPARTMENT

53. The proposed development shall obtain approval and comply with all Los Angeles County Fire Department requirements.

BUSINESS LICENSE

54. All parties involved in the subject project located at 24200 S. Main Street including to but not limited to contractors and subcontractors are required to obtain a city business license per Section 6310 of the Carson Municipal Code.



ROYAL TRUCK BODY
14001 GARFIELD AVE, PARAMOUNT, CA 90723

A BRIEF OVERVIEW OF ROYAL TRUCK BODY OPERATIONS

Dudley De Zonia, Managing Member and CEO, founded Royal Truck Body in 1971. Today Royal Truck Body is the largest manufacturer of service and utility truck bodies in the Western United States. The company is headquartered in Paramount, California, where it manufactures and distributes products for Southern California; in addition, the company has distribution, sales and installation facilities at branch locations in Roseville, California; Union City, CA; Fort Worth, Texas; Dallas, TX; and Phoenix, Arizona.

In the mid-1990's, Royal Truck Body made a strategic decision to become a business partner of the OEMs and their dealers by entering into a special relationship known in the industry as a "pool (also known as a "bailment pool" or "chassis conversion pool".) RTB became a strategic partner to the chassis manufacturer and, at the same time, to the commercial dealer organization, by ordering and warehousing commercial chassis inventory. RTB Paramount signed "pool" agreements with Chevrolet, GMC, Ford, Isuzu and Dodge between 1995 and 2005. In 2009 Fortress Resources, LLC purchased the name Royal Truck Body.



Royal Truck Body was founded on the principle of commitment to quality in providing for customers' service needs". Today, 44 years later, the "ROYAL" trademark of quality has emerged as the recognized leader in the Western United States over all other competitors.

CUSTOMERS - COMMERCIAL TRUCK DEALERS

Royal's Primary Customer Base is GMC, Chevrolet, Ford, and Ram commercial truck dealers in their respective geographic markets.

Royal currently sells to more than 300 + dealers in the major markets within the Western US. GM dealers comprise the largest subset of this group, followed closely by Ford dealers.

END -USE CUSTOMER BASE

Royal designs, manufactures and installs a full array of service bodies to commercial truck dealers for their end-use customers, who are in a variety of service and construction industries. The service industries include, but are not limited to, the following industries: construction, plumbing, electrical, landscaping, and heating and air conditioning, insulation, solar, etc.

Royal Truck Body markets and sells to a variety of customer types. These include automotive dealers; government entities such as cities, county, state, federal agencies; universities and school districts; private utility companies; water companies; fleet management companies and B2B end users. The principal focus is the automotive dealer body.

Telephone 562/633-9951 • Toll-Free: 800/834-7692 • FAX 562/633-2277
www.royaltruckbody.com

EXHIBIT NO. 03





ROYAL TRUCK BODY

14001 Garfield Avenue, Paramount, California 90723

City of Carson

701 East Carson ST.
Carson, CA. 90745

03/03/2016

To Whom It May Concern.

Our present total Employee head Count is 126 persons. We operate the plant on a one shift basis. We have an approximate 5% expansion and contraction in our head count throughout the year due to variation in the demand for our product.

Sincerely,

Jeff Lombardi
Facility Manager
Royal Truck Body
14001 Garfield Ave
Paramount, ca. 90723

David O. Roberts, P.E., Inc.
343 THIRD ST., SUITE 103
LAGUNA BEACH, CA 92651
Ph. (949) 497-1229 Fax (949) 497-1330
Cell (949) 633-1621 dave@DORoberts.com

March 2, 2016

Project No. 14115

City of Carson
Planning Department
Attn: McKina Alexander

Re: Design Overlay Review No. 1584-15
Royal Truck Body Photometrics
24200 S. Main St.

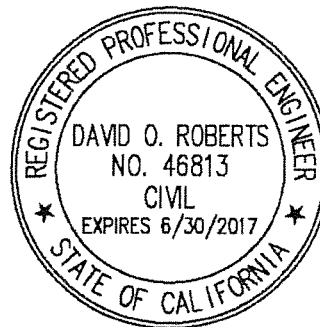
A photometric plan has been provided to demonstrate lighting levels throughout the rear and south side yards. Please notice the lack of light levels beyond the easterly block wall, which is 2'-6" clear setback from the easterly property lines. The lack of light spilling into the residential yards is due to the location, direction and shielding of light radiating from fixtures at 40 feet above the finished surface. Parking Lot Lighting Notes follow:

1. The photometric plan data represents the illumination at ground level in foot candles. One foot candle is equal to one lumen of light per square foot, or the illumination produced by a source of one candle at a distance of one foot.
2. The foot candle reading will dissipate going away from the pole fixture.
3. Light shields (neighbor shields) will be installed on the light pole fixtures as needed to keep lighting from going outside the parking foot print, or property lines.
4. On the plan, the symbol (+) represents the location of the footcandle measurement. Notice that there is no "spillage" of light beyond easterly block wall. The block wall is 2'-6" clear of the easterly property line due to the light shields.
5. In addition to light shields, there is a line of "sound & light" buffer trees planted in a 10 foot wide planter which is parallel to the development's easterly property line (adjacent to residential properties). It is expected that the buffer tree planting and 8 foot block wall will provide additional obstructions to parking lot lighting.

Please call if you have any questions.



David O. Roberts, P.E., MSCE



LEYMASTER ENVIRONMENTAL CONSULTING, LLC

5500 East Atherton Street, Suite 210
Long Beach, California 90815
Phone (562) 799- 9866
Fax (562) 799-1963

The following is the scope of work involved with a Phase I Environmental Assessment following ASTM E 1527-05 practices:

1. Prepare a history of the subject site development and land use based on data collected from local agency records, aerial photos, on-site inspection and individuals as appropriate.
2. Review pertinent records of local Building, Fire, Environmental and other departments that may have information regarding, or an official interest in, the site or its improvements.
3. Investigate the site and nearby properties with regard to information included in the EPA National Priorities List and CERCLIS List, the Department of Toxic Substances Control State Superfund List and CALSITES List, and listings of sites of environmental concern maintained by other regulatory agencies.
4. Review applicable records and files of the Department of Toxic Substances Control, Regional Water Quality Control Board, Integrated Waste Management Board, and other regulatory agencies for the subject site and for nearby properties that in the opinion of the assessor may affect the subject site.
5. Analyze available recent and historical aerial photographs to identify or verify past uses, developments, improvements or modifications made to the site, including ponds, tanks, oil wells, sumps, or disposal areas on the site or adjacent properties.
6. Inspect the site and interiors of all buildings for potential environmental concerns resulting from the handling, use, storage, and disposal of hazardous chemicals, underground tanks, clarifiers, and liquid-filled electrical devices.
7. Identify the present use of all immediately adjacent properties and determine the current status of any environmental conditions or investigations of these properties that could impact the site.
8. Conduct a search of appropriate records to determine the existence, if any, of environmental liens and, activity and use limitations affecting the subject site.
9. Review Chain-of-Title reports for potential environmental concerns that may affect the subject site. A title report for the property must be provided or will be obtained by LEC at an additional cost.
10. A written report describing the subject site, improvements and adjacent properties and discussing all findings and any analytical work that may have been authorized will be prepared.

11. If evidence of the presence or suspected presence of an area of environmental concern is found, the evidence and location will be described. If no evidence of the presence or suspected presence of an area of environmental concern is found, an appropriate conclusion will be provided.

A survey for lead-based paint, asbestos-containing building materials or an assessment of indoor air quality are not within the scope of this assessment. If an investigation for asbestos-containing building materials is desired, a United States Environmental Protection Agency/California Division of Occupational Health and Safety-Certified inspector is required to do this work. This highly regulated and specific survey will be covered under a separate proposal. We appreciate the opportunity to present our proposal to you. Please call us if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Mark Leymaster". The signature is fluid and cursive, with the first name "Mark" being more prominent.

Mark Leymaster
Environmental Professional

LEYMASTER ENVIRONMENTAL CONSULTING, LLC

5500 East Atherton Street, Suite 210
Long Beach, California 90815
(562) 799-9866 phone
(562) 799-1963 fax

QUESTIONNAIRE

Per EPA 40 CFR Part 312 – Standards and Practices for All Appropriate Inquires, in order to qualify for one of the *Landowner Liability Protections (LLPs)* offered by the Small Business Liability Relief and Brownfields Revitalization Act of 2001 (the *Brownfields Amendments*), the *Property owner* must provide the following information (if available) to the *environmental professional*. Failure to provide this information could result in a determination that “*all appropriate inquiry*” is not complete.

1. Are you aware of any environmental cleanup liens against the Property that are filed or recorded under federal, tribal, state or local law?

NO

2. Are you aware of any AULs, such as engineering controls, land use restrictions or institutional controls that are in place at the site and/or have been filed or recorded in a registry under federal, tribal, state or local law?

NO

3. Do you have any specialized knowledge or experience related to the Property or nearby properties? For example, are you involved in the same line of business as the current or former occupants of the Property or an adjoining property so that you would have specialized knowledge of the chemicals and processes used by this type of business?

To the best of my knowledge no chemical users have used the subject property.

4. If the Property is being sold, does the purchase price being paid for this Property reasonable reflect the fair market value of the Property? If you conclude that, there is a difference, have you considered whether the lower purchase price is because contamination is known or believed to be present at the Property?

N/A

LEYMASTER ENVIRONMENTAL CONSULTING, LLC

5500 East Atherton Street, Suite 210
Long Beach, California 90815
(562) 799-9866 phone
(562) 799-1963 fax

5. Are you aware of commonly known or reasonably ascertainable information about the Property that would help the environmental professional to identify conditions indicative or releases or threatened releases? For example, as user,

a. Do you know the past uses of the Property?

Owned by the Sanitation District.

b. Do you know of specific chemicals that are present or once were present at the Property?

Unknown

c. Do you know of spills or other chemical releases that have taken place at the Property?

Unknown, on the property.

d. Do you know of any environmental cleanups that have taken place at the Property?

Unknown.

6. As the Property owner, based on your knowledge and experience related to the Property are there any obvious indicators that point to the presence or likely presence of contamination at the Property?

Unknown

Completed by:

Date:

[Signature]

4-16-14

Name and Title

Ratthana Jimson
Agent To Owner

LEYMASTER ENVIRONMENTAL CONSULTING, LLC

April 22, 2014

Ms. Kathy Stimson
SB Management Corporation
433 N. Camden Drive, Suite 800
Beverly Hills, CA 90210

Re: PHASE I ENVIRONMENTAL SITE ASSESSMENT REPORT
24200 S. Main Street
Carson, California 90745

Dear Ms. Stimson:

We are pleased to enclose our Phase I Environmental Site Assessment Report for the above-referenced property.

Leymaster Environmental Consulting appreciates the opportunity to have been of assistance and looks forward to working with you again. Please call if you have any questions regarding this report.

Sincerely,



Mark Leymaster
Environmental Professional



Myrna A. Rangel
Environmental Professional

Enclosure

5500 E. Atherton Street, Suite 210
Long Beach, CA 90815
Office (562) 799-9866 Fax (562) 799-1963
www.leymaster.net

PHASE I ENVIRONMENTAL SITE ASSESSMENT REPORT

24200 S. Main Street
Carson, California 90745

April 22, 2014

Submitted by:

Leymaster Environmental Consulting, LLC
5500 East Atherton Street, Suite 210
Carson, California 90815
(562) 799-9866

TABLE OF CONTENTS

1. Summary.....	1
2. Introduction	2
2.1 PURPOSE	2
2.2 DETAILED SCOPE OF SERVICES	2
2.3 SIGNIFICANT ASSUMPTIONS	2
2.4 LIMITATIONS AND EXCEPTIONS OF ASSESSMENT	3
2.5 SPECIAL TERMS AND CONDITIONS	4
2.6 USER RELIANCE	4
3. Site Description	4
3.1 LOCATION AND LEGAL DESCRIPTION.....	4
3.2 SITE AND VICINITY GENERAL CHARACTERISTICS	5
3.3 CURRENT USE OF THE PROPERTY	5
3.4 DESCRIPTIONS OF STRUCTURES, ROADS, OTHER IMPROVEMENTS	5
3.5 CURRENT USES OF ADJOINING PROPERTIES	5
4. User Provided Information	6
4.1 TITLE RECORDS	6
4.2 ENVIRONMENTAL LIENS OR ACTIVITY AND USE LIMITATIONS	6
4.3 SPECIALIZED KNOWLEDGE.....	6
4.4 COMMONLY KNOWN OR REASONABLY ASCERTAINABLE INFORMATION	7
4.5 VALUATION REDUCTION FOR ENVIRONMENTAL ISSUES	7
4.6 OWNER, PROPERTY MANAGER, AND OCCUPANT INFORMATION	7
4.7 REASON FOR PERFORMING PHASE I ESA	7
4.8 OTHER	8
5. Record Review.....	8
5.1 STANDARD ENVIRONMENTAL RECORD SOURCES	8
5.2 ADDITIONAL RECORD SOURCES (SEE APPENDIX F)	9
5.2.1 <i>California Department of Toxic Substances Control</i>	9
5.2.2 <i>South Coast Air Quality Management District</i>	9
5.2.3 <i>County of Los Angeles Department of Public Health</i>	9
5.2.4 <i>County of Los Angeles Sanitation District</i>	9
5.2.5 <i>County of Los Angeles Department of Public Works</i>	9
5.2.6 <i>Regional Water Quality Control Board</i>	9
5.3 PHYSICAL SETTING SOURCE(S)	9
5.3.1 <i>Topography</i>	9
5.3.2 <i>Soils/Geology</i>	10
5.3.3 <i>Hydrogeology</i>	10
5.3.4 <i>Flood Zone Information</i>	10
5.3.5 <i>Oil and Gas Exploration</i>	10
5.4 HISTORICAL USE INFORMATION ON THE PROPERTY	10
5.4.1 <i>Sanborn Fire Insurance Maps</i>	11

5.4.2	<i>City of Carson Building and Planning Departments</i>	11
5.4.3	<i>Aerial Photography</i>	11
5.4.4	<i>Historical Topographic Maps</i>	12
5.4.5	<i>Additional Historical Record Sources</i>	12
5.4.6	<i>Prior Assessment Reports</i>	12
5.5	HISTORICAL USE INFORMATION ON ADJOINING PROPERTIES.....	12
6.	Site Reconnaissance	13
6.1	METHODOLOGY AND LIMITING CONDITIONS.....	13
6.2	GENERAL SITE SETTING.....	13
6.3	EXTERIOR OBSERVATIONS.....	13
6.3.1	<i>Solid Waste Disposal</i>	13
6.3.2	<i>Surface Water Drainage</i>	13
6.3.3	<i>Wells and Cisterns</i>	13
6.3.4	<i>Wastewater</i>	13
6.3.5	<i>Additional Site Observations</i>	14
6.4	INTERIOR OBSERVATIONS.....	14
6.5	POTENTIAL ENVIRONMENTAL CONDITIONS.....	14
6.5.1	<i>Hazardous Materials and Petroleum Products Used or Stored</i>	14
6.5.1.1	UNIDENTIFIED CONTAINERS AND DRUMS.....	14
6.5.1.2	DISPOSAL LOCATIONS OF REGULATED/HAZARDOUS WASTE.....	14
6.5.2	<i>Evidence of Releases</i>	14
6.5.3	<i>Polychlorinated Biphenyls (PCBs)</i>	14
6.5.4	<i>Landfills</i>	15
6.5.5	<i>Pits, Ponds, Lagoons, Sumps, and Catch Basins</i>	15
6.5.6	<i>On-site Aboveground and Underground Storage Tanks</i>	15
6.5.7	<i>Radiological Hazards</i>	15
6.5.8	<i>Drinking Water</i>	16
6.5.9	<i>Additional Hazard Observations</i>	16
6.5.11	<i>Lead-Based Paint</i>	16
6.5.12	<i>Mold</i>	16
6.5.13	<i>Radon</i>	17
6.5.14	<i>EDR Vapor Encroachment Screen</i>	17
7.	Interviews	17
7.1	INTERVIEW WITH OWNER.....	17
7.2	INTERVIEW WITH SITE MANAGER.....	18
7.3	INTERVIEW WITH OCCUPANTS.....	18
7.4	INTERVIEW WITH LOCAL GOVERNMENT OFFICIALS.....	18
7.5	INTERVIEW WITH OTHERS.....	18
8.	Findings	18
9.	Opinions	18
10.	Conclusions	19
11.	Deviations	19
12.	Additional Services	19

13.	References.....	19
14.	Signature of Environmental Professionals.....	20
15.	Qualifications of Environmental Professionals.....	21
16.	Appendices.....	22

APPENDICES

16.1	LOCAL AREA MAP.....	Appendix A
16.2	EDR GOVERNMENT RECORDS REPORT.....	Appendix B
16.3	EDR CITY DIRECTORY.....	Appendix C
16.4	EDR LIEN REPORT.....	Appendix D
16.5	EDR SANBORN Map.....	Appendix E
16.6	SUPPLEMENTAL AGENCY REVIEW.....	Appendix F
16.7	AERIAL PHOTOGRAPHS.....	Appendix G
16.8	SITE PHOTOGRAPHS.....	Appendix H
16.9	SPECIAL CONTRACTUAL CONDITIONS BETWEEN USER AND ENVIRONMENTAL PROFESSIONAL	Appendix I
16.10	QUESTIONNAIRES.....	Appendix J
16.11	EDR VAPOR ENCROACHMENT SCREENING	Appendix K

PHASE I ENVIRONMENTAL SITE ASSESSMENT REPORT

24200 S. Main Street
Carson, California 90745

1. Summary

Leymaster Environmental Consulting, LLC, performed a Phase I Environmental Site Assessment (ESA) in general accordance with the scope of work and limitations set forth by Ms. Kathy Stimson, of SB Management Corporation, on behalf of CBB Carson Properties, LLC for the property located at 24200 S. Main Street, Carson, California 90745 (the "Property"). CBB Carson Properties, LLC is lessee under a long-term ground lease involving the Property.

The Phase I Environmental Assessment is designed to provide CBB Carson Properties, LLC with an assessment concerning environmental conditions (limited to those issues identified in the report) as they exist at the Property. This assessment was conducted utilizing generally accepted ESA industry standards in accordance with ASTM E 1527-13, Standard Practice for Environmental Assessments: Phase I Environmental Site Assessment Process and EPA Final All Appropriate Inquiries (AAI) standard practices. Any exceptions to or deletions from this practice are described in *Section 2.4* of this report.

The Property was undeveloped land until 1977, when the American Can Company constructed the existing building. City of Carson Building & Safety records show that the building was part of the larger American Can Company facility and was used for warehousing purposes. It remained in such use until the late 1990's, when the facility was decommissioned. Luggage America Inc., a manufacturer and distributor of luggage and travel accessories has occupied the Property since 2000. Onsite operations include warehouse storage, distribution, and general office use.

Active oil wells are present on the west adjacent property and on an outparcel located on the eastern portion of the Property. It is our experience that significant contamination from operating oil wells is highly unlikely. However, in the event that contamination is discovered, a responsible party is readily identifiable.

There are two CERCLIS sites listed in the Environmental Data Resources, Inc. (EDR) report and supplemental agency review attachments of this report. No environmental concerns exist as a result of these sites due to either the distance from the Property, the absence of violations, or responsible parties have been identified for the environmental concern.

There is an additional nearby property that is incorrectly outside of the EDR search radius known as the Purex/Turco site, located at 24700 Main Street. This site is undergoing active remediation for volatile organic compounds through vapor extraction. The results of a vapor encroachment screening assessment indicate there is no apparent threat to the Property.

This assessment revealed no evidence of environmental conditions associated with the Property. No further investigation is recommended at this time.

2. Introduction

Leymaster Environmental Consulting, LLC (LEC) was retained by SB Management Corporation, on behalf of CBB Carson Properties, LLC, to conduct a Phase I Environmental Site Assessment (ESA) of the property located at 24200 S. Main Street, Carson, California 90745 (Local Area Map – Appendix A). The protocol used for this assessment is in general conformance with ASTM E 1527-13, Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessments Process and EPA Final All Appropriate Inquiries (AAI) standard practices.

2.1 Purpose

The purpose of this ESA was to identify existing or potential recognized environmental conditions (as defined by ASTM Standard E 1527-13) in connection with the Property. LEC understands that the findings of this assessment will be used by CBB Carson Properties, LLC in connection with a pending financial transaction involving the Property.

2.2 Detailed Scope of Services

The scope of work for this ESA is in general accordance with the requirements of ASTM Standard E 1527-13 and EPA AAI. LEC warrants that the findings and conclusions contained herein were accomplished in accordance with the methodologies set forth in the Scope of Work. These methodologies are described as representing good commercial and customary practice for conducting an Environmental Site Assessment of a property for the purpose of identifying environmental conditions.

No other warranties are implied or expressed.

2.3 Significant Assumptions

There is a possibility that even with the proper application of these methodologies there may exist on the Property conditions that could not be identified within the scope of the assessment or that were not

reasonably identifiable from the available information. LEC believes that the information obtained from the record review and the interviews concerning the Property is reliable. However, LEC cannot and does not warrant or guarantee that the information provided by these other sources is accurate or complete. The methodologies of this assessment are not intended to produce all inclusive or comprehensive results, but rather to provide CBB Carson Properties, LLC with information relating to the Property.

2.4 Limitations and Exceptions of Assessment

The principal of Leymaster Environmental Consulting, LLC whose seal and signature appear hereon, has reviewed this report. No staff member of LEC has any interest or contemplated interest, financial or otherwise, in the subject or surrounding properties, or in any entity which owns, leases, or occupies the subject or surrounding properties, or which may be responsible for environmental issues identified during the course of this investigation, or has any personal bias with respect to the parties involved. Phase I environmental assessments are non-comprehensive by nature and are unlikely to identify all environmental problems or eliminate all risk. This report is a qualitative assessment. LEC offers a range of investigative and engineering services to suit the needs of our clients, including more quantitative investigations. Although risk can never be eliminated, more detailed and extensive investigations yield more information, which may help the Client understand and better manage risks. Because such detailed services involve greater expense, we ask our clients to participate in identifying the level of service, which will provide them with an acceptable level of risk. Please contact the signatories of this report if you would like to discuss this issue of risk further.

LEC performed this Phase I ESA in general accordance with the guidelines set forth in ASTM E 1527-13 and EPA AAI, and subsequently approved by you as our Client. The conclusions represent professional judgments and are based upon the findings of the investigations identified in the report and the interpretation of such data based on our experience and expertise according to the existing standard of care. No other warranty or limitation exists, either expressed or implied. Environmental issues not specifically addressed in the report were beyond the scope of our work and were not included in our evaluation. The findings and conclusions contain all of the limitations inherent in the methodologies that are referred to in ASTM E 1527-13.

2.5 Special Terms and Conditions

The conclusions and findings set forth in this report are strictly limited in time and scope to the date of the evaluations. The conclusions presented in the report are based solely on the services described therein, and not on scientific tasks or procedures beyond the scope of agreed-upon services or the time and budgeting restraints imposed by the client. Unless specifically stated otherwise in the report, no chemical analyses were performed during the course of this ESA.

Some of the information provided in this report is based upon personal interviews and upon research of available documents, records, and maps held by the appropriate government and private agencies. The interviews and research are subject to the limitations of historical documentation, availability, and accuracy of pertinent records and the personal recollections of those persons contacted.

2.6 User Reliance

All reports, both verbal and written, are for the benefit of CBB Carson Properties, LLC, its successors and assigns. Any party other than CBB Carson Properties, LLC who would like to use this report shall notify Leymaster Environmental Consulting, LLC of such intended use in writing. Based on the intended use of the report, LEC may require that additional work be performed and that an updated report be issued. Noncompliance with any of these requirements by the aforementioned parties or anyone else will release LEC from any liability resulting from the use of this report by any unauthorized party.

3. Site Description

3.1 Location and Legal Description

The Property is located on the east side of Main Street in the City of Carson, California. The cross streets are Sepulveda and Lomita Boulevards.

The Property is described as "*That portion of the Rancho San Pedro, in the City of Carson, in the County of Los Angeles, State of California, as per map recorded in Book 1 Page(s) 119 of Patents, in the office of the County Recorder of said County, and that portion of Lincoln School Tract in said City and County, as per Map recorded in Book 8 Page 118 of Maps, in the office of the County Recorder of said County*". See ***Environmental Lien Report*** in Appendix D for a complete description.

Easements for sewer, storm drains, electrical supply systems, and incidental purposes are associated with the Property.

The Property is recorded with the County of Los Angeles Tax Assessor's Office as Assessor's Parcel No. 7406-001-915.

3.2 Site and Vicinity General Characteristics

The Property is located in a commercial/industrial and residential area in the City of Carson, California. Topography at the site is flat with commercial and retail developments on the north adjacent property. Railroad tracks on the south adjacent property beyond which is a multi-tenant commercial/industrial development. An oil well facility is on the west adjacent property. An outparcel on the eastern portion of the Property contains oil wells and is connected to the oil well facility to the west by an easement that traverses the southern portion of the Property. Residential housing is on the east adjacent property.

3.3 Current Use of the Property

Luggage America Inc., a manufacturer and distributor of luggage and travel accessories has occupied the Property since 2000. Onsite operations include warehouse storage, distribution, and general office use.

3.4 Descriptions of Structures, Roads, Other Improvements

The Property consists of approximately 10.09 acres developed with an approximate 96,000 square-foot concrete tilt-up building with a flat roof and steel-framed windows and doors. Seven dock-high loading docks are present along the west wall. The remaining area is asphalt parking and undeveloped land.

The following utilities service the site:

Electric:	Southern California Edison
Gas:	The Gas Company
Water:	Golden State Water Company
Sewer:	Los Angeles County Sanitation District

3.5 Current Uses of Adjoining Properties

During the vicinity reconnaissance, LEC observed the following land use on properties in the immediate vicinity of the Property.

North: Multi-tenant retail/commercial development, located at 200-250 E. Sepulveda Boulevard. Tenants include:

Staples	GNC
Kuman After School Learning	Skin Care & Nails Spa
Fantastic Sam's	Roop Threading
Sally Beauty Supply	Albertsons/US Bank

South: Railroad tracks. Beyond is the Main Street Business Center, located at 24412-24426 Main Street.

East: E&B Natural Resources Management Corporation – oil wells and residential housing.

West: E&B Natural Resources Management Corporation – oil well facility.

4. User Provided Information

Pursuant to ASTM E 1527-13 and EPA AAI, LEC requested the following site information from Ms. Kathy Stimson on behalf of CBB Carson Properties, LLC (user of this report).

4.1 Title Records

First American Title Insurance Company provided a preliminary title report for the Property. LEC reviewed the report and did not note any items of an environmental concern. Although a Chain-of-Title report was not reviewed, it does not represent an environmental concern because the historical uses of the Property have been established through other resources.

4.2 Environmental Liens or Activity and Use Limitations

LEC requested information from Ms. Stimson regarding knowledge of environmental liens, activity and use limitations for the Property. Ms. Stimson was not aware of any environmental liens associated with the Property and had no knowledge of any use or activity limitations. Additionally, according to the EDR Lien Report and the title report, no environmental liens were identified for the Property.

4.3 Specialized Knowledge

No specialized knowledge of the Property was used for this report.

4.4 Commonly Known or Reasonably Ascertainable Information

LEC inquired regarding any specialized knowledge of environmental conditions associated with the Property. Ms. Stimson indicated she is not aware of any environmental conditions associated with the Property.

An Internet search of the Property did not reveal any pertinent additional information.

4.5 Valuation Reduction for Environmental Issues

LEC inquired regarding any knowledge of reductions in property value due to environmental issues. Ms. Stimson indicated the Property is not being sold.

4.6 Owner, Property Manager, and Occupant Information

The owner of the Property is County Sanitation District No. 8 of Los Angeles County. See **Section 7.3** for Owner and Occupant information.

4.7 Reason for Performing Phase I ESA

The purpose of this Phase I Environmental Assessment (ESA) was to identify existing or potential Recognized Environmental Conditions (as defined by ASTM Standard E 1527-13) in connection with the Property. This ESA was also performed to permit the user to satisfy one of the requirements to qualify for the *innocent landowner*, *contiguous property owner*, or *bona fide prospective purchaser* limitations on scope of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) (42 U.S.C. §9601) liability (hereinafter, the "*landowner liability protections*," or "*LLPs*"). ASTM Standard E 1527-13 constitutes "*all appropriate inquiry* into the previous ownership and uses of the Property consistent with good commercial or customary practice" as defined at 42 U.S.C. §9601(35) (B).

User continuing obligations, as defined in the 2002 Brownfield Amendments, consist of the following:

- Complying with land use restrictions and institutional controls;
- Taking "reasonable steps" with respect to hazardous substances releases;

- Providing full cooperation, assistance, and access to persons that are authorized to conduct response action or natural resource restoration;
- Complying with information requests and administrative subpoenas; and
- Providing all legally required notices.

LEC understands that the findings of this assessment will be used by CBB Carson Properties, LLC in connection with a pending financial transaction involving the Property.

4.8 Other

The users did not provide any other information.

5. Record Review

A Government Records Report by Environmental Data Resources (EDR) for the Property and surrounding area has been provided as Appendix B. Information pertaining to the Property and neighboring sites not included in the EDR report has been provided as Appendix C.

5.1 Standard Environmental Record Sources

A complete listing of sources has been provided as Appendix B.

The Property is not listed in any of the databases searched by Environmental Data Resources, Inc.

Sites listed by EDR within 1/2 mile of the Property for NPL and CERCLIS and within 1/8 mile for all other databases are discussed below.

The Comprehensive Environmental Response, Compensation and Liability Information System (CERCLIS) contains data on potentially hazardous waste sites that have been reported to the USEPA by states, municipalities, private companies and private persons, pursuant to Section 103 of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA). CERCLIS contains sites which are either propose to or on the National Priorities list (NPL) and sites which are in the screening and assessment phase for possible inclusion on the NPL:

- Monterey Pines Development 241-319 E. Lomita Boulevard
- Price Transfer Mercury 24760 S. Main Street

None of the sites listed in the Orphan summary page of the EDR report were noted in the general area of the Property.

5.2 Additional Record Sources (See Appendix F)

5.2.1 California Department of Toxic Substances Control

The Department of Toxic Substances Control (DTSC) offices located in Cypress and Chatsworth, California reported no files or records associated with the Property.

5.2.2 South Coast Air Quality Management District

A search of the South Coast Air Quality Management District's Facility Information Detail (FIND) database revealed no files or records associated with the Property.

5.2.3 County of Los Angeles Department of Public Health

The County of Los Angeles Department of Public Health reported no files or records associated with the Property.

5.2.4 County of Los Angeles Sanitation District

The Los Angeles County Sanitation District reported no files or records associated with the Property.

5.2.5 County of Los Angeles Department of Public Works

The County of Los Angeles Department of Public Works reported no files or records associated with the Property.

5.2.6 Regional Water Quality Control Board

The Regional Water Quality Control Board reported no files or records associated with the Property.

5.3 Physical Setting Source(s)

5.3.1 Topography

The Torrance Quadrangle topographic map, published by the United States Geological Survey (USGS), was reviewed for this ESA. According to the map, the elevation at the subject site is



approximately 45 feet. The topography in the area of the site is relatively flat.

5.3.2 Soils/Geology

The surface geology at the site is mapped by the California Division of Mines and Geology (Geologic Map of California – Long Beach Sheet) as Quaternary non-marine terrace deposits of Pleistocene age. The United States Department of Agriculture Natural Resources Conservation Service has not conducted any soil surveys in the area.

5.3.3 Hydrogeology

The subject site is located on the Coastal Plain of Los Angeles County within the West Coast Groundwater Basin. Monitoring wells in the area show that the depth to groundwater beneath the site is approximately 55 feet and that the direction of groundwater flow is to the northeast. There are no surface-water bodies within one mile of the site.

5.3.4 Flood Zone Information

A review of the Flood Insurance Rate Maps, published by the Federal Emergency Management Agency, was performed. According to Panel Number 06037C1945F, the Property is located in a moderate to low flood zone. Moderate to low zones consist of areas with less than 1% chance of sheet flooding each year; areas that have less than a 1% chance of sheet flooding with an average depth of less than 1-foot; areas that have less than a 1% chance of stream flooding where the contributing drainage area is less than 1 square-mile; or areas protected from floods by levees. No base flood elevations or depths are shown within these zones.

5.3.5 Oil and Gas Exploration

The State of California Department of Conservation Division of Oil, Gas, and Geothermal Resources (DOG) records were reviewed.

According to the DOGGR - Online Mapping System, no abandoned or active wells are on the Property.

5.4 Historical Use Information on the Property

The Property was undeveloped land until 1977, when the American Can Company constructed the existing building. City of Carson Building &

Safety records show that the building was part of the American Can Company facility and was used for warehousing. It remained in such use until the late 1990's, when the facility was decommissioned.

5.4.1 Sanborn Fire Insurance Maps

The Sanborn Fire Insurance Maps did not offer coverage for the Property. (See Appendix E).

5.4.2 City of Carson Building and Planning Departments

Building permit records were reviewed at the City of Carson Building & Safety Department. The earliest permit on file was issued in July 1977 to American Can Company for the construction of an electrical enclosure. Several permits for miscellaneous tenant improvements were also on file. No permits of an environmental concern were noted.

LEC also reviewed building permit records for American Can Company (110 E. Sepulveda Boulevard) to determine the use of the Property. Facility maps show that the Property building was used for warehousing purposes.

5.4.3 Aerial Photography

Historical aerial photographs are reviewed in order to assist in identifying any past practices that may have negatively impacted the Property. Photographs from 1928 to 2012 were reviewed concerning this location.

1928 The Property is undeveloped. (See Appendix G.)

1947 No changes are noted from the previous photograph.

1952 Railroad tracks are now present at the eastern perimeter of the Property. No other changes are noted from the previous photograph.

1963 No changes are noted from the previous photograph.

1972 No changes are noted from the previous photograph. (See Appendix G.)

1981 The Property is developed to present-day appearances. (See Appendix G.)

1989 No changes are noted from the previous photograph.

1994 No changes are noted from the previous photograph.

2005 No changes are noted from the previous photograph.

2009 No changes are noted from the previous photograph.

2010 No changes are noted from the previous photograph.

2012 No changes are noted from the previous photograph. (See Appendix G.)

5.4.4 Historical Topographic Maps

Historical Topographic Maps did not provide pertinent additional information.

5.4.5 Additional Historical Record Sources

Additional historical record research sources, other than those discussed above, were determined not to be necessary as part of this assessment.

5.4.6 Prior Assessment Reports

LEC was provided with a Phase I Environmental Site Assessment Report dated March 17, 2011. LEC reviewed the report and did not note any items that would change the conclusion of this report.

5.5 Historical Use Information on Adjoining Properties

By review of the standard historical sources referenced above, the historical uses of the adjoining properties are summarized below:

North: Undeveloped land until sometime after 1947. By 1952, commercial/industrial use.

South: Railroad tracks and undeveloped land until sometime after 1952. By 1963, commercial/industrial use.

East: Railroad tracks and undeveloped land. By 1989, oil field operations. Beyond is residential housing since 1963.

West: Undeveloped land until sometime after 1972. By 1981, oil field operations.

6. Site Reconnaissance

6.1 Methodology and Limiting Conditions

The Property was inspected by Myrna Rangel, Project Manager, on April 17, 2014. The weather at the time of the site visit was sunny and clear.

6.2 General Site Setting

The Property encompasses approximately 10.09 acres; it is situated in a commercial/industrial and residential area of Carson, California.

6.3 Exterior Observations

The periphery of the Property was observed, as was the periphery of all structures on the Property; no items of an environmental concern were noted.

6.3.1 Solid Waste Disposal

There was no indication of potentially hazardous material disposal noted during the site reconnaissance.

6.3.2 Surface Water Drainage

Topography at the Property is flat; surface drainage is via sheet flow to the curb and gutter systems along Main Street.

6.3.3 Wells and Cisterns

No aboveground evidence of wells or cisterns was observed during the site reconnaissance.

6.3.4 Wastewater

No indications of industrial wastewater disposal or treatment facilities were observed during the site reconnaissance.

6.3.5 Additional Site Observations

No additional relevant general site observations were observed during the site reconnaissance.

6.4 Interior Observations

The offices consist of carpeted flooring and acoustic ceiling panels with fluorescent lighting. No items of an environmental concern were noted.

The warehouse consists of concrete flooring, a wood-trussed ceiling with skylights, and drop fluorescent lighting. The concrete floor appeared in good condition. No drains or sumps were observed. No items of an environmental concern were noted.

6.5 Potential Environmental Conditions

6.5.1 Hazardous Materials and Petroleum Products Used or Stored

No evidence of the use of hazardous materials or wastes was observed on the Property.

6.5.1.1 Unidentified Containers and Drums

No unidentified containers or drums were observed on the Property during the site reconnaissance.

6.5.1.2 Disposal Locations of Regulated/Hazardous Waste

No obvious indications of hazardous waste generation, storage or disposal were observed on the Property or were identified during interviews.

6.5.2 Evidence of Releases

No obvious indications of hazardous material or petroleum product releases, such as stained areas or stressed vegetation were observed during the site reconnaissance or reported during interviews.

6.5.3 Polychlorinated Biphenyls (PCBs)

Older transformers and other electrical equipment could contain polychlorinated biphenyls (PCBs) at a level that subjects them to regulation by the U.S. EPA. PCBs in electrical equipment are controlled by United

States Environmental Protection Agency regulations 40 CFR, Part 761. Under the regulations, electrical equipment can be classified into three categories:

- Less than 50 parts per million (ppm) of PCBs – *"Non-PCB" transformer*
- 50 ppm-500 ppm – *"PCB-Contaminated" electrical equipment*
- Greater than 500 ppm – *"PCB" transformer*

A pad-mounted transformer (#P5494016) is present outside at the northwest corner of the building. No staining or discoloration was noted at the base of the transformer.

6.5.4 Landfills

No evidence of an on-site landfill was observed or reported during the site reconnaissance. A search of the State of California Solid Waste Information System did not indicate the presence of an historical landfill. In addition, the EDR report includes a review of listings concerning landfills; there is no indication that landfills have been located on or within on-half mile of the Property.

6.5.5 Pits, Ponds, Lagoons, Sumps, and Catch Basins

No evidence of on-site pits, ponds, lagoons was observed or reported during the site reconnaissance. No evidence of sumps or catch basins, other than used for storm water removal, was observed or reported during the site reconnaissance.

6.5.6 On-site Aboveground and Underground Storage Tanks

No aboveground or underground storage tanks were observed during the site reconnaissance or were reported during interviews.

6.5.7 Radiological Hazards

No radiological substances or equipment were observed during the site reconnaissance or were reported during interviews.

6.5.8 Drinking Water

The Property is supplied by the Golden State Water Company. According to a water quality report dated 2012, the drinking water supplied to the Property is within state and federal standards, including lead and copper. Water sampling was not conducted at the Property to verify water quality.

6.5.9 Additional Hazard Observations

No additional hazards were observed on the Property.

6.5.10 Asbestos-Containing Building Materials

Although a survey for asbestos-containing building materials was not within the requested scope of work, this building was built during a period when asbestos-containing materials were commonly used in flooring, insulation, roofing, or many other building materials. Therefore, asbestos-containing building materials are most likely present at the site. The most likely materials to contain asbestos are floor tiles, "popcorn" ceilings, and insulation normally involved with heating, ventilation and air conditioning units and roofing materials. These observations do not represent a certified asbestos inspection, and laboratory analysis is required to positively identify any asbestos-containing materials.

6.5.11 Lead-Based Paint

A survey for lead-based paint (LBP) was not within the requested scope of work. Based on information provided by Forensic Analytical Specialties, Inc., which conducts LBP surveys, LBP was extensively used in buildings constructed by the 1920s. The paint industry voluntarily cut back on the amount of lead used in paint in 1955, but LBP has been commonly used up to the present throughout the construction industry, especially on frictions and impact surfaces (doors, windows, floors, etc.) and in bathrooms, kitchens, and exteriors for moisture resistance. The structure was constructed during the period when LBP was not extensively used; therefore, LBP is not likely to be present, but this cannot be verified without a certified LBP inspection.

6.5.12 Mold

LEC observed the accessible interior areas of the Property structure(s), for the presence of conspicuous mold or observed water intrusion or accumulation. LEC did not note conspicuous visual or olfactory indications of the presence of mold, nor did LEC observe obvious

indications of significant water damage. No sampling was conducted as part of this assessment.

This activity was not designed to discover all areas, which may be affected by mold growth on the Property. Rather, it is intended to give the client an indication as to whether or not conspicuous (based on observed areas) mold growth is present at the Property. This evaluation did not include a review of pipe chases, HVAC systems or areas behind enclosed walls and ceilings.

6.5.13 Radon

The U.S. EPA and the U.S. Geological Survey have evaluated the radon potential in the United States and have developed a map to assist National, State, and local organizations to target their resources and to assist building code officials in deciding whether radon-resistant features are applicable in new construction. The map divides the country into three radon zones, and is used to assign each of the counties in the United States to one of these zones based on radon potential. Each zone designation reflects the average short-term radon measurement that can be expected to be measured in a building without the implementation of radon control methods. The radon zone designation of the highest priority is Zone 1.

- Zone 1 - Highest Potential (greater than 4 pCi/L)
- Zone 2 - Moderate Potential (from 2 to 4 pCi/L)
-
- Zone 3 – Low Potential (less than 2 pCi/L)

A review of the EPA Map of Radon Zones places the Property in Zone 2, where average predicted radon levels are between 2 and 4 pCi/L.

6.5.14 EDR Vapor Encroachment Screen

Based on the results of EDR's E2600-10 Tier 1 Vapor Encroachment Screening included as *Appendix K*, vapor intrusion does not appear to be a concern at the Property.

7. Interviews

7.1 Interview with Owner

LEC did not interview the Owner of the Property. This does not represent a data gap because the historical uses have been established through other resources.

7.2 Interview with Site Manager

See *Section 4.0* and *Appendix J* of this report for User provided information.

7.3 Interview with Occupants

LEC interview Ms. Joolie Kim on April 17, 2014. Ms. Kim indicated that she is not aware of any above or underground storage tanks on the Property nor is she aware of any hazardous material use or storage. Ms. Kim further indicated she is not aware of any environmental concerns associated with the Property.

7.4 Interview with Local Government Officials

See *Section 5.2* of this report.

7.5 Interview with Others

No other interviews were conducted by LEC.

8. Findings

Leymaster Environmental Consulting, LLC completed a Phase I Environmental Site Assessment on the property located at 24200 S. Main Street, Carson, California.

Active oil wells are present on the west adjacent property and on the outparcel located on the eastern portion of the Property.

There are two sites within 1/2 mile of the Property noted in the Environmental Data Resources, Inc. Report CERCLIS database.

A nearby site undergoing remediation is incorrectly outside of the EDR search radius.

9. Opinions

Active oil wells are present on the west adjacent property and on an outparcel located on the eastern portion of the Property. It is our experience that significant contamination from operating oil wells is highly unlikely. However, in the event that contamination is discovered, a responsible party is readily identifiable.

No environmental concerns exist as a result of the sites listed in the EDR Report and supplemental agency review attachments of this report due to either the distance from the Property, the absence of violations, or responsible parties have been identified for the environmental concern.

There is an additional nearby property that is incorrectly outside of the EDR search radius known as the Purex/Turco site, located at 24700 Main Street. This site is undergoing active remediation for volatile organic compounds through vapor extraction. The results of a vapor encroachment screening assessment indicate there is no apparent threat to the Property.

10. Conclusions

Leymaster Environmental Consulting, LLC has performed a Phase I Environmental Site Assessment of the property located at 24200 S. Main Street, Carson, California in conformance with the scope of limitations of American Society for Testing and Materials (ASTM), Standard Practice for Assessment Process, E 1527-13 and EPA Final All Appropriate Inquiries (AAI) standard practices. Any exceptions to, or deletions from this practice are described in *Section 2.3* of this report.

This assessment revealed no evidence of environmental conditions associated with the Property. No further investigation is recommended.

11. Deviations

This Phase I Environmental Site Assessment substantially complies with the scope of services and ASTM E 1527-13 and EPA AAI, as amended, except for exceptions and/or limiting conditions discussed in *Section 2.4*.

12. Additional Services

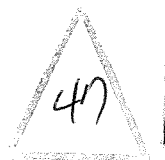
No additional services, outside the scope of this Phase I Environmental Site Assessment, were contracted for between the user and LEC.

13. References

American Society for Testing and Materials, Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessments Process, ASTM Standard E 1527-13.

State of California Department of Conservation, Division of Oil and Gas Geothermal Resources.

South Coast Air Quality Management District, Public Records Request.



Department of Toxic Substances Control, Public Records Act Request.

County of Los Angeles Department of Public Health, Public Records Act Request.

County of Los Angeles Sanitation District, Public Records Act Request.

County of Los Angeles Department of Public Works, Public Records Act Request.

Regional Water Quality Control Board, Public Records Act Request.

City of Carson Building and Safety Department, Public Records Act Request.

U.S.GS Water-Supply Paper 1109 *Ground-water Geology of the Coastal Zone Carson-Santa Ana Area, California*. 1956.

California Department of Water Resources, Planned Utilization of the Groundwater Basins in the Coastal Plain of Los Angeles County, Bulletin 104-A, Reprinted 1988.

Environmental Data Resources, Incorporated, Government Records Report, April 10, 2014.

Environmental Data Resources, Incorporated, Preliminary Sanborn Map Report, April 10, 2014.

Environmental Data Resources, Incorporated, Aerial Photography Print Service, April 11, 2014.

Environmental Data Resources, Incorporated, City Directory, April 11, 2014.

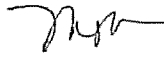
Environmental Data Resources, Environmental Lien Report, April 18, 2014.

14. Signature of Environmental Professionals

I declare that to the best of my professional knowledge and belief, I meet the definition of environmental professional as defined in §312.10 of 40 CFR 312. I have the specific qualifications based on education, training, and experience to assess a property of the nature, history, and setting of the subject property. I have developed and performed the all-appropriate inquiries in conformance with the standards and practices set forth in 40 CFR Part 312.



Mark Leymaster
Environmental Professional



Myrna A. Rangel
Environmental Professional

15. Qualifications of Environmental Professionals

Mark Leymaster

Mr. Leymaster is the President of Leymaster Environmental Consulting, LLC. Mr. Leymaster is a Registered Professional Engineer in the State of California (M23031) and is also a Registered Environmental Assessor II in the State of California (20057). Mr. Leymaster has over 20 years of experience as an environmental consultant.

Mr. Leymaster's responsibilities have included Phase I property transfer assessments, compliance audits, permitting, soil and groundwater investigations, remediation projects, litigation support, expert testimony, overseeing manufacturing facility closures, and the closure of Transport, Storage, and Disposal facilities.

His projects have included defining the lateral and vertical extent of soil and groundwater contamination of sites for both organics and inorganics. Agency sign-offs for both groundwater and soil remediation sites have been received for systems designed, installed, and operated by Mr. Leymaster. He has evaluated many Brownfield sites for potential buyers and has overseen the successful property transaction, remediation installation and development of the properties. Mr. Leymaster has conducted approximately 200 Phase I environmental site assessments at a variety of commercial, industrial, and residential properties including: defense manufactures, plating facilities, printing shops, salvage yards, foundries, dry cleaners, apartment complexes, office buildings, shopping centers and automotive maintenance facilities. He has performed approximately 150 subsurface soil and groundwater investigations. He has evaluated and completed remediation of over 30 facilities contaminated with metals, chlorinated solvents, volatile organic compounds and acids.

Myrna Rangel

Ms. Rangel is a Registered Environmental Assessor in the State of California (30264) and has over eight years experience in the environmental field. She has been involved in conducting Phase I and Phase II Environmental Site Assessments, managing on-going remediation projects, and liaising with regulatory agencies and the UST Cleanup fund. Her field experience includes soil, groundwater and soil-vapor sampling.

Ms. Rangel has completed over 200 Phase I environmental site assessments at a variety of commercial and industrial properties including: electronics manufacturing facilities, chemical companies, plating facilities, city yards, paint manufacturing and printing shops, machine shops, salvage yards, foundries, manufacturing facilities, manufactured gas facilities, office buildings, shopping centers and automotive maintenance facilities.

16. Appendices



GYANT COMPLIANCE

March 12, 2016

Royal Truck Body
24200 S. Main Street
Carson, Ca 90745
Attn: Mr. Dudley De Zonia

RE: Environmental Permitting of Royal Truck Body Carson Facility

To: Mr. Dudley De Zonia

This letter is to give you an overview of where we are in the process of Royal Truck Body's environmental permitting, manufacturing processes to reduce emissions and any health risk by using state-of-art abatement technology.

The environmental permits have been approval by South Coast Air Quality Management District (SCAQMD) with all operational permit conditions. Royal truck Body will have the original permit documents by March 18, 2016 ready to start the installation and construction of the equipment and systems for the Carson facility.

The regulated pollutants are volatile organic compounds (VOC) and hazardous air pollutants (HAP's) which will be reduced by a minimum of 95% destruction efficiency using a controlled abatement technology system. The spray booths and curing booth have a 100% Permanent Total Enclosure (PTE) efficiency performance, meaning no release of VOC's or HAP's. The RTO with the Concentrator are continuously monitored 24/7 to confirm 95% reduction of emissions.

Summary of Control Technology

The emission source listed above routes processed vent gases to a Rotary Wheel Concentrator with Desorb burner and Regenerative Thermal Oxidizer. The VOC emissions are abated through adsorption and hot air stripping from the Zeolite desorption bed, which is considered to be "inherent process equipment" as defined in 40 CFR Part 64.1. The processed vent gases from both primer and topcoat spray booths flow into the Rotary Wheel Concentrator and are captured with 12 Zeolite segment beds (10 adsorption, 1 desorption and 1 Purge/cooling bed). The specific weight of Zeolite in the Concentrator is around 230kgs and continuously regenerates. The Concentrator's optimal rotation speed should be 8 rph with a total adsorption capacity of 310 lbs. which converts to 2.5 lbs. per ft³ x 124 ft³ = 310 lbs.



GYANT COMPLIANCE

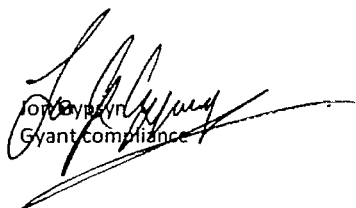
The destruction efficiency of the Rotary Wheel Concentrator is 96%. The remaining gases are then processed through the RTO which has a 99% destruction efficiency.

A Continuous Equipment Monitoring System (CEM) will be installed to monitor the Rotary Wheel Concentrator adsorption beds' efficiency. Capture efficiency will be maintained with a CEM system that is a FID analyzer that is capable of ppb to ppm sensitivity for multiple gas species in a variety of applications: stack emissions monitoring, process monitoring, ambient air monitoring and purity monitoring. The CEM system performs analysis of gas streams that contain VOC's. In addition, operators will find the robust, fully automated CEM system easy to operate and maintain

Note that a Continuous Assurance Monitoring (CAM) plan has been implemented to manage the operation of both the Rotary Wheel Concentrator with Regenerative Thermal Oxidizer and addresses the capture efficiency.

In conclusion, Royal Truck Body has spent the last 12 months working on a complete solution for both the local environment and company sustainability approach for the future under the Clean Air Act.

Best regards


Jon G. Pryn
Gyant Compliance



P.O BOX 6091 – Laguna Niguel – California 92677
Tel: (949) 495-0999 – Fax: (949) 716-4098

ACOUSTICAL REPORT
ROYAL TRUCK BODY
24200 S. MAIN STREET
CARSON, CALIFORNIA

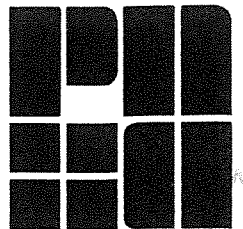
Prepared for: Charles J. Lyons III
Lyons Main Carson LLC
880 Apollo Street, Suite 125
El Segundo, California 90245
Emailed To chuckie@lyonsandlyons.net

Prepared by: Roger C. Noppe, Principal Consultant
Purcell + Noppe + Associates, Inc.
21408 Devonshire Street
Chatsworth, California 91311

PNA Project No. 0915050/3706

October 2, 2015

EXHIBIT NO. 07



Purcell + Noppe + Assoc., Inc.

53

ACOUSTICAL REPORT
ROYAL TRUCK BODY
24200 S. MAIN STREET
CARSON, CALIFORNIA

In accordance with the request of Lyons Main Carson, LLC, a detailed acoustical study was conducted by our firm to determine if the proposed Royal Truck Body facility, to be located within an approximately 10.0 acre site located at 24200 S. Main Street in the City of Carson, California, if constructed and operated as presently proposed, would be in compliance with the City of Carson, Noise Control Ordinance.

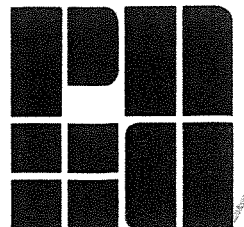
The acoustical study included, but was not limited to, the following considerations:

A review of the current plans for the proposed Royal Truck Body project, which includes minor modifications to the exterior of an existing concrete tilt-up warehouse, the installation of the manufacturing/fabrication equipment within the existing building as required for the operation of the plant, and the paving of a large portion of the site, approximately 4.5 acres in area, that is vacant except for one area that houses oil well operations, which is located between the building and the residential properties to the east, that would be utilized for parking and short term storage of brand new pick-up truck chassis to be fit with the truck bodies fabricated and installed by Royal Truck Body.

A tour/acoustical measurement program that was conducted by our firm at the existing Royal Truck Body facility located in the City of Paramount, California, to become familiar with the overall operation of the plant, and to obtain quantitative acoustical data on the noise levels generated both inside of and at the exterior of the buildings housing the manufacturing/fabrication equipment due to the operation of the equipment.

A review of the results of extensive noise monitoring conducted by Behrens and Associates, Inc. for E&B Natural Resources that included two measurement locations located at the north and south ends of the easternmost property boundary on the subject site, which are adjacent to the existing residential properties. The acoustical measurements were conducted on a number of separate days during January and February of 2015, and included hourly Leq sound level measurements extending over several 24-hour time periods. The principal source of the noise condition existing at the subject project site that produced the measured noise levels is the essentially continuous operation of the oil drilling and associated equipment operated by E&B Natural Resources. In addition to the oil well operations, a railroad track located at the south side of the site, has occasional train operations that result in significantly louder, but short duration, noise exposure at the subject residential properties. These noise sources will remain in operation during and following the development of the Royal Truck Body facility.

The above referenced project conditions are presented in greater detail in subsequent portions of this report.



It is our conclusion that the proposed new Royal Truck Body operation to be located on the subject site at 24200 S. Main Street in the City of Carson would be in conformance with the requirements of the City of Carson - Noise Control Ordinance as set forth in Chapter 5 of the Carson Municipal Code.

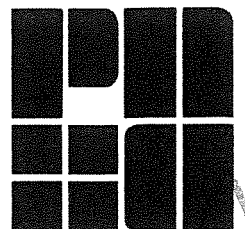
With regard to the proposed plans for, and the operation of, the Royal Truck Body facility, the eastern boundary of the subject property is adjacent to an existing residential area that includes six (6) residences. Included in this report is copy of a Google aerial view of the project site and the surrounding properties.

The residences are separated from the subject site by walls located on each property that range from approximately 2' to 6' in height. Portions of the existing walls are in a state of disrepair. The proposed project site improvements would include the removal of the existing walls and replacement of the walls with a 8' high CMU sound wall extending along the entire eastern boundary of the site. In addition, the proposed site plan includes a 10' wide set-back that will include a 7' wide planter "sound buffer" planted with drought-tolerant Desert Willow trees and low-maintenance scrubs, which will be constructed adjacent to the sound wall.

Typical activity on the 4.5 acre portion of the site between the existing building and the eastern property line would consist of the existing oil well operations and the starting and moving of approximately 15 new vehicles from the parking lot into the truck body fabrication and installation building. Periodically new "replacement" vehicles would be driven onto the parking/storage area to replenish the required inventory. No off loading or loading of vehicles would be permitted on this portion of the project site. Off loading and loading of completed vehicles would occur at the southern and western portions of the site, which are adjacent to the railroad and industrial properties.

Noise-producing operations that would occur within the existing concrete tilt-up building include the fabrication and installation of the truck bodies manufactured by Royal Truck Body. Welding, metal stamping, metal finishing and painting are the primary activities that would take place. A large number of acoustical measurements was made within and exterior to the existing Royal Truck Body facility by our technical staff members. The measurements were conducted with Class 1 calibrated precision acoustical measurement instrumentation. Calibration of the instrumentation was checked with a precision acoustical calibrator at the beginning and conclusion of the measurement program.

The short duration dB(A) Leq sound levels measured within the existing Royal Truck Body facility typically ranged between a low of 68.0 and a high of 85.7. Exterior to the manufacturing/fabrication/installation building(s) the dB(A)Leq sound levels obtained at a distance of 50 feet from the buildings ranged between 62.7 and 71.2. At the outdoor "mounting of hardware area," the sound level was 57.0 dB(A)Leq. At a distance of 100 feet from the



buildings, the measured noise level reached a maximum of 67.7 dB(A)Leq. All outdoor measurements were made with the doors in the existing metal buildings in the full open position.

In the new facility, the manufacturing/fabrication/installation operations will take place within the existing tilt-up concrete building.

The north side of the building, which is adjacent to the service area for the existing commercial Staples and Home Depot operations, will have no doors or windows. The concrete wall along this property line will provide a minimum 35 dB(A) of noise reduction for the activities occurring within the building resulting in a maximum noise exposure condition of 51.0 dB(A)Leq, which more than meets the 55.0 dB(A) criteria for permissible sound levels occurring on commercial properties during nighttime hours.

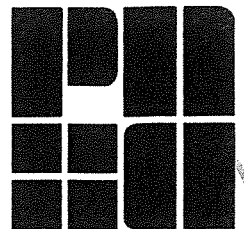
The east wall of the existing concrete building will have only two personnel access doors and two 10'x12' doors. One of the 10'x12' doors will be utilized to enable the new pick-up truck chassis to be brought into the plant, or for the completed vehicles to exit. The other door will be for access to a shipping staging area. It was agreed by representatives of Royal Truck Body that these doors would remain closed during nighttime hours, and would also be normally closed during daytime hours if determined to be necessary in order to minimize sound transmission from the plant to the residential area. A 150 hp air compressor that was proposed to be located in a shed to be constructed adjacent to the east wall of the building will be relocated to the south wall where it will face the railroad and industrial properties.

A Regenerative Thermal Oxidizer (RTO) will be located adjacent to the east wall of the building. We were advised by Royal Truck Body that the RTO to be installed will be a custom, factory-modified unit that will include sound attenuating devices. In discussing the sound attenuation requirements with a representative of the supplier who will be furnishing the RTO, he stated that the sound attenuating devices to be utilized may include an enclosure at the process blower, and may also include a Variable Frequency Drive (VFD) at the combustion air fan. The manufacturer's representative was confident that the project requirements for permissible noise levels at the project property lines due to the operation of the RTO would be achieved.

The south wall of the concrete building, facing the existing railroad and industrial properties, will have two 10'x12' doors that will typically be open during normal hours of operation of the plant.

The west wall of the building, which faces the existing oil well operations and other industrial properties, will contain the personnel doors utilized for access to the office area of the plant, and the shipping and receiving dock.

As required by paragraph 12.08.460 of the City of Carson Noise Control Ordinance, which states that "Loading, unloading, opening, closing or other handling of boxes, crates, containers, building materials, garbage cans or similar objects between the hours of 10:00 p.m. and 6:00 a.m. in a manner as to cause noise disturbance is prohibited." will be strictly enforced.



With regard to the existing ambient noise levels at the eastern boundary of the subject site, which is directly adjacent to the existing residential properties, extensive noise monitoring was conducted by Behrens and Associates Inc., an Environmental Noise Control firm, for E&B Natural Resources, which operates oil drilling and associated activities on properties that are located within or adjacent to the subject project site. The noise monitoring locations included two stations at the northeast and southeast corners of the 24200 S. Main Street site, which is directly adjacent to the residential properties. The noise data from the Behrens and Associates, Inc. noise monitoring program was provided to Lyons Main Carson, LLC by E&B Natural Resources and was sent to us in order to assist us in preparing the City of Carson required Acoustical Study and Report.

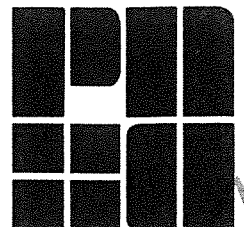
The noise monitoring report shows that over a period of nine (9) 24-hours days, the daily average ambient noise levels at the eastern property line ranged between a low of 55.3 dB(A)Leq and a high of 59.9 dB(A)Leq. The average 24 hour dB(A)Leq noise level for the nine days of measurements is 57.0 dB(A)Leq. The hourly Leq noise levels ranged between a low of 48.7 dB(A) (which occurred only one time during the 216 hours included in the measurement program) and 67.6 dB(A) (again which occurred only one time during the 216 hours included in the measurement program).

Based on the above, the 24-hour 57.0 dB(A)Leq average ambient noise level existing at the eastern property boundary is the appropriate criteria for permissible noise levels from operations associated with the operation of the proposed Royal Truck Body facilities.

As we set forth earlier in this report, we have concluded that the proposed Royal Truck Body operations would result in noise exposure conditions at the adjacent properties that would be in conformance with the requirements of the City of Carson Noise control Ordinance. This conclusion is based on the reported quantitative acoustical data, our in-office study and analysis, and observation related to the project as reported herein. In addition, we have taken into consideration the following statement provided to us by a principal of Lyons Main Carson, LLC and agreed to by a senior representative of Royal Truck Body.

"Please note the following parameters.

1. The easterly wall of the existing concrete tilt-up building is approximately 500 feet from the easterly property line for the residential homes.
2. The easterly approximately 4.5 acres of the total approximately 10 acre site will be paved and used solely for parking new pickup standard size vehicles.
3. There are currently no truck access doors on the easterly wall of the existing building.



4. All container and heavy truck loading is intended to be conducted on the westerly wall of the existing building, facing the industrial zone property to the west.
5. There will be two access doors saw cut in the easterly wall at the north of the building for the purpose of driving the pickup type standard sized vehicles out of the building.
6. It is intended that the easterly loading door will be closed during normal work hours, and any ventilation will be done via electric fans in the roof in order to minimize any sound within the building from conducting outside of the building.
7. The receiving and shipping of the pickup sized vehicles will be conducted on an automotive transport which is typical for retail automotive dealers, and said loading will be staged on the south side of the building, and will be more than 500 feet from the easterly property line.
8. All forklift loading and unloading of materials and supplies will be done on the south side of the building, will be mostly doc hi [sic] with the container trucks abutting the westerly building loading docks, and in my humble opinion would not emit sound that could be heard on the opposite side of the building where the homes are.

In summary, the business model is a very light industrial use, especially on the easterly 5 acres. All metal work and machining work will be conducted within the concrete tilt-up building with the doors closed on the eastside. "

Attached are thirty two (32) acoustical data sheets associated with the acoustical measurement program conducted at the existing Royal Truck Body facilities located in Paramount, California. Also attached is a copy of a Google Aerial View photograph of the 24200 S. Main Street site which also shows the existing properties that are located adjacent to, and in the vicinity of, the proposed Royal Truck Body project.

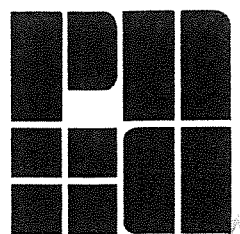
Prepared by:



Roger C. Noppe, Principal Consultant

RCN:jpw

Encl: Proposed site map
Acoustical data sheets
PNA Summary of Services
Roger C. Noppe Biography



Purcell + Noppe + Assoc., Inc.



Choices + Possibilities = The Best Results



8' SERVICE BODY

Options: Raised Roll Top with Barn Doors, Ladder Rack, and Conduit Box

11' SERVICE BODY

Option: Ladder Rack for Cabover style chassis.

8' HIGH PROFILE BODY

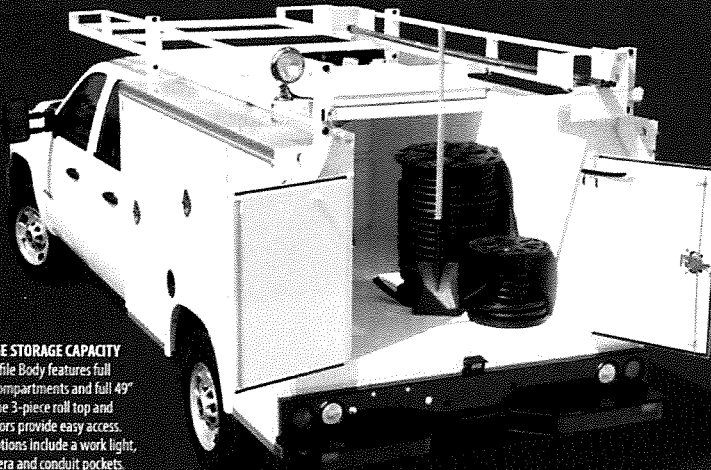
Options: 3-Piece Roll top, Barn Doors, Work Light, Back-Up Camera, Ladder Rack and Conduit Pockets. Shown on Crew Cab. Available on other chassis.

MIX & MATCH FOR A PERFECT FIT

Royal works one-to-one with our clients. Shown here are a few of the possible component combinations we offer.

We have a complete selection of innovative accessories ready to meet the challenges you face in your business.

Let us know how we can meet your needs.



EXTRA LARGE STORAGE CAPACITY

This High Profile Body features full height side compartments and full 49" bed width. The 3-piece roll top and wide barn doors provide easy access. Additional options include a work light, back-up camera and conduit pockets.

EXHIBIT NO. 08



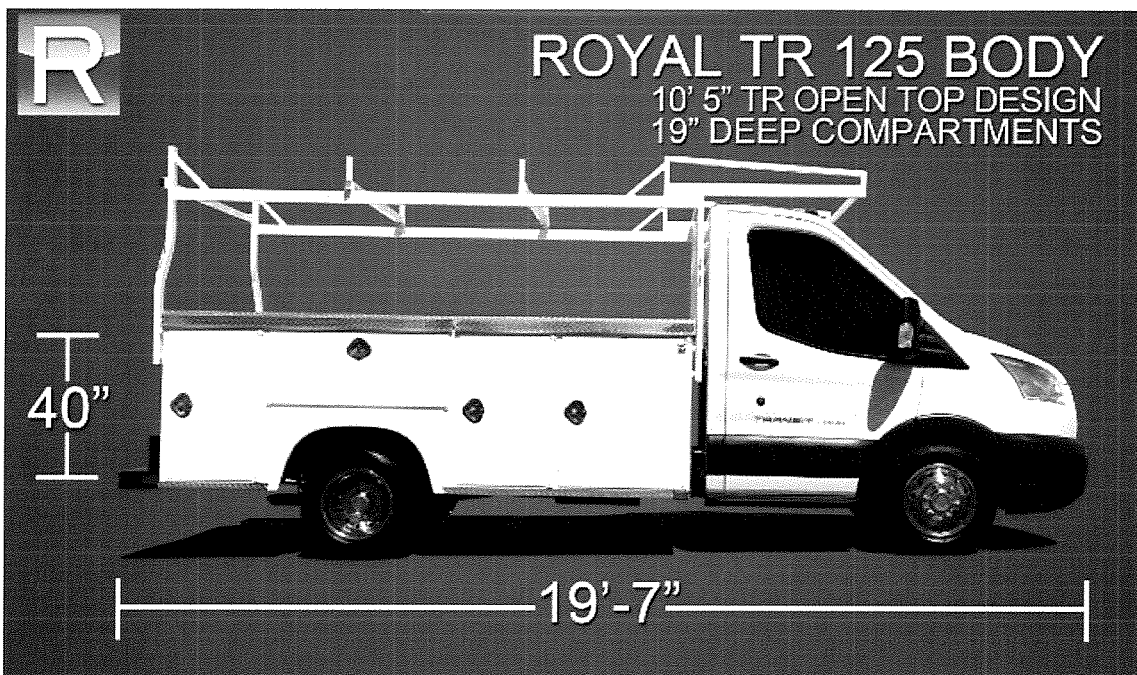
New from Royal Truck Body...

The ROYAL TR 125



Add more VALUE to your fleet with the ROYAL TR 125 Body...

Get more Efficiency, more Capacity, more Productivity, more Safety and more Savings!



PRODUCTIVITY

The TR 125 BODY is designed to provide maximum storage capacity while maintaining exceptional drivability.

SECURITY^{FORTRESS}

Protection should never be an option. Royal's standard security offers best in class protection utilizing the exclusive Fortress Lock System.

VALUE

Low Price Point combined with the power and dependability of the new FORD Transit Cab Chassis make this package a value leader. Carry More. Do