

FINAL ENVIROMENTAL IMPACT REPORT

Imperial Avalon Mixed-Use Project

SCH# 2021010116
November 2022



Prepared for:

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Final Environmental Impact Report

Imperial Avalon Mixed-Use Project (SCH No. 2021010116)

NOVEMBER 2022

Prepared for:



CITY OF CARSON

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1 Introduction

1.1 Introduction

This Final Environmental Impact Report (EIR) was prepared for the proposed Imperial Avalon Mixed-Use Project (Project) in accordance with the California Environmental Quality Act (CEQA) (California Public Resources Code Sections 21000–21177).

Project Overview

The Project involves (1) the adoption of the Imperial Avalon Specific Plan (IASP), which would establish a new regulating plan within the IASP area (Project site) and allow for the development of residential, commercial, recreational/open space uses, and (2) implementation of the IASP through the development of a specific development proposal, which involves relocation or disposal of existing mobile home coaches, demolition of other existing on-site structures, and the development of a mixed-use neighborhood containing multifamily residences, townhomes, neighborhood-serving commercial uses, open space and recreation opportunities, and associated parking areas. Collectively, the IASP and implementation of the specific development proposal constitute the Project analyzed in this EIR and are referred to as the “Project.” Thus, The Project, as evaluated in this Draft EIR, would involve (1) a General Plan Amendment to change the Project site’s General Plan Land Use Designation from Regional Commercial and Low Density Residential to Urban Residential, (2) a zone change to change the Project site’s zoning from Commercial, Automotive and RM-8-D zone to Specific Plan, (3) adoption of the IASP, (4) site plan and design review and (5) a tentative tract map to facilitate the construction of the proposed development, and (6) approval of a development agreement.

Contents and Use of a Final EIR

As described in CEQA and the CEQA Guidelines, public agencies are charged with the duty to avoid or substantially lessen significant environmental effects, with consideration of other conditions, including economic, social, technological, legal, and other benefits. As required by CEQA, this Final EIR assesses the significant direct and indirect environmental effects of the Project, as well as the significant cumulative impacts that could occur from implementation of the Project. This Final EIR is an informational document only, the purpose of which is to identify the significant effects of the Project on the environment; to indicate how those significant effects could be avoided or significantly lessened, including feasible mitigation measures; to identify any significant and unavoidable adverse impacts that cannot be mitigated to less than significant; and to identify reasonable and feasible alternatives to the Project that would avoid or substantially lessen any significant adverse environmental effects associated with the Project and achieve the fundamental objectives of the Project.

Before approving a project, CEQA requires the lead agency to prepare and certify a Final EIR. The contents of a Final EIR are specified in Section 15132 of the CEQA Guidelines, as follows:

1. The draft EIR or a revision of the draft.
2. Comments and recommendations received on the draft EIR either verbatim or in summary.
3. A list of persons, organizations, and public agencies commenting on the draft EIR.
4. The responses of the Lead Agency to significant environmental points raised in the review and consultation process.

5. Any other information added by the Lead Agency.

In accordance with the above-listed requirements, this Final EIR for the Project incorporates the publicly circulated Draft EIR, which is provided under a separate cover, and consists of the following:

1. All agency and public comments received during the public review comment period for the Project.
2. Responses to public comments.
3. Changes to the Draft EIR since it was circulated for public review.
4. The Project's Mitigation Monitoring and Reporting Program.

This Final EIR, in combination with the Draft EIR, as amended by text changes and any necessary Errata, constitute the EIR that will be considered for certification by the City and may be used to support approval of the proposed Project, either in whole or in part, or one of the alternatives to the Project discussed in the Draft EIR.

As required by Section 15090 (a) (1)-(3) of the CEQA Guidelines, a lead agency, in certifying a Final EIR, must make the following three determinations:

1. The Final EIR has been completed in compliance with CEQA.
2. The Final EIR was presented to the decision-making body of the lead agency, and the decision-making body reviewed and considered the information in the Final EIR prior to approving the project.
3. The Final EIR reflects the lead agency's independent judgment and analysis.

As required by Section 15091 of the CEQA Guidelines, no public agency can approve or carry out a project for which an EIR has been certified that identifies one or more significant environmental effects of the project unless the public agency makes one or more written findings (Findings of Fact) for each of those significant effects, accompanied by a brief explanation of the rationale for each finding, supported by substantial evidence in the record. The possible findings are as follows:

1. Changes or alterations have been required in, or incorporated into the project which avoid or substantially lessen the significant environmental effect as identified in the Final EIR.
2. Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency.
3. Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the Final EIR.

Additionally, pursuant to Section 15093(b) of the CEQA Guidelines, when a lead agency approves a project that would result in significant unavoidable impacts that are disclosed in the Final EIR, the agency must state in writing the reasons supporting the action. The Statement of Overriding Considerations must be supported by substantial evidence in the lead agency's administrative record.

The Draft Findings of Fact and Statement of Overriding Considerations are provided as a separate document that may be considered for adoption by the City at the time at which the project is considered.

1.2 Contents and Organization

The Final EIR will be used by the City as an informational document for the proposed Project. The Final EIR, in compliance with Section 15132 of the CEQA Guidelines, is organized as follows:

Chapter 1, Introduction. This chapter provides general information on, and the procedural compliance of, the proposed Project and the Final EIR.

Chapter 2, Responses to Comments. This chapter includes a list of public agencies and individuals who provided comments on the Draft EIR during the public review period. The chapter includes the comments received on environmental issues raised during the public review process for the Draft EIR and the City's responses to these comments. Comment letters are categorized by whether they were submitted by public agencies or individuals. Each comment letter is numbered and presented with brackets indicating how the letter has been divided into individual comments. Each comment is given a binomial, starting with an "A" or "I", indicating whether the comment letter was submitted by a public agency or individual, respectively, followed by the number of the comment letter and the comment number. For example, comments in first public agency comment letter are numbered A1-1, A1-2, A1-3, and so on. Responses to comments subsequently provided with binomials that correspond to the bracketed comments.

Chapter 3, Changes to the Draft Environmental Impact Report. This chapter contains a summary of changes made to the document since publication of the Draft EIR as a result of comments received, updated Project information, or other information provided by City staff. Revisions clarify information presented in the Draft EIR, and only minor technical changes or additions have been made. These text changes provide additional clarity in response to comments received on the Draft EIR, but do not change the significance of the conclusions presented in the Draft EIR. Changes are signified by strikeout text (i.e., ~~strikeout~~) where text was removed and by underline text (i.e., underline) where text was added.

Chapter 4, Mitigation Monitoring and Reporting Program. This chapter provides the Mitigation Monitoring and Reporting Program for the proposed Project. The Mitigation Monitoring and Reporting Program is presented in table format and identifies mitigation measures for the proposed Project, the party responsible for implementing the mitigation measures, the timing of implementing the mitigation measures, and the monitoring and reporting procedures for each mitigation measure. Project design features that were identified in the EIR are also included in this chapter to verify that these features are incorporated within the Project and to ensure enforceability.

Chapter 5, References. This chapter lists references cited.

Draft EIR (Under Separate Cover). This Final EIR incorporates the Draft EIR as circulated during public review. The Draft EIR includes a detailed description of the Project, an analysis of the Project's environmental impacts, and a discussion of alternatives to the Project. The Draft EIR is available on the City's website at <https://ci.carson.ca.us/CommunityDevelopment/ImperialAvalon.aspx>. Copies of the Draft EIR are also available for public review at the following location:

City of Carson
Community Development Department, Planning Division
701 East Carson Street
Carson, California 90745

1.3 California Environmental Quality Act Review

In accordance with Section 15082 of the CEQA Guidelines, the City released an Initial Study and Notice of Preparation on January 13, 2021, for the required 30-day review period to interested agencies, organizations, and individuals. The purpose of the Notice of Preparation is to provide notification that an EIR for the Project was being prepared, and to solicit guidance on the scope and content of the document. The Notice of Preparation was sent to the State Clearinghouse at the California Governor's Office of Planning and Research. The State Clearinghouse assigned a state identification number (SCH No. 2021010116) to the Project. The Notice of Preparation was also posted at the County Clerk's office and on the City's website. Copies of the Notice of Preparation were distributed to all applicable agencies and tribes on the City's noticing list, as well as surrounding property owners within 2,000 feet of the Project site. Hard copies of the Initial Study and Notice of Preparation were made available for review at the City's Community Development Department, located at 701 East Carson Street, Carson, California 90745. A public scoping meeting was held on Thursday, January 28, 2021 at 6:00 p.m., via Zoom webinar, to gather additional public input on the scope of the environmental document.

The 30-day public scoping period ended on February 12, 2021. Comments received during the 30-day public scoping period were considered during preparation of the Draft EIR. Comments received in 2021 are summarized in Chapter 2, Introduction, of the Draft EIR, and copies of the comment letters received are provided in Appendix A of the Draft EIR. The primary areas of controversy identified by the public and agencies included the following potential issues (the Draft EIR section that addresses the issue raised is provided in parentheses):

- Recommendation for contacting the appropriate regional California Historical Research Information System Center; contacting the Native American Heritage Commission for Sacred Lands File search and Native American Tribal Consultation List; and for compliance with Assembly Bill 52 and other applicable laws (see Section 4.3, Cultural Resources and Tribal Cultural Resources)
- Recommendation to include a Transportation Impact Study, using Vehicle Miles Traveled to evaluate transportation impacts, and identification of potential traffic impacts (see Section 4.13, Transportation)
- Recommendation to use South Coast Air Quality Management District's CEQA Air Quality Handbook and CalEEMod land use emissions software when preparing air quality and greenhouse gas analyses (see Section 4.2, Air Quality, Section 4.6, Greenhouse Gas Emissions)
- Concern regarding the displacement of existing residents of the Mobile Home Park resultant from the Mobile Home Park closure (Section 4.11, Population and Housing)
- Recommendation to minimize traffic and potential parking issues on Grace Avenue (see Section 4.13, Transportation)

Pursuant to Section 15087 of the CEQA Guidelines, following completion of the Draft EIR, a Notice of Availability (NOA) of a Draft EIR for the project was published in the newspaper and circulated CEQA State Clearinghouse, Los Angeles County Clerk Recorder, property owners and occupants within a 2,000-foot radius of the project site. Additionally, hard copies of the Draft EIR were made available for review at the City's Community Development Department and the Martin Luther King Jr. Library. The NOA indicated that the Draft EIR was available for public review and comment for a 45-day public review period. During the 45-day comment period, it was brought to the City's attention that some parties were inadvertently left off of the public distribution list, namely surrounding jurisdictions, applicable agencies, and some parties who previously requested to be added to the project's distribution list. On September 14, 2022, during the 45-day public review period, the City circulated notices to these

remaining parties and indicated that the City would accept comments on the Draft EIR period for an additional 45-day period.

The City received 4 comment letters during the 2022 Draft EIR public review period. A list of the comments received, copies of the comment letters received, and responses to comments are included in Chapter 2 of this Final EIR.

Per CEQA Guidelines Section 15088, responses to comments submitted by public agencies are required to be provided to the commenting agency at least 10 days prior to the public hearing at which the EIR and Project will be considered. The City provided responses to comments submitted by public agencies via email and FedEx delivery on November 10, 2022. Additionally, the City distributed a NOA of a Final EIR to all parties that were previously provided a NOA of the Draft EIR, as well as parties that commented on the Draft EIR. The City has also posted this Final EIR on the City's website. Hard copies of the Final EIR were made available for review at the City's Community Development Department.

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2 Responses to Comments

This chapter of the Final Environmental Impact Report (EIR) for the Imperial Avalon Mixed-Use Project (Project) includes a copy of all comment letters that were submitted during the public review period for the Draft EIR, along with responses to comments in accordance with California Environmental Quality Act (CEQA) Guidelines Section 15088.

The responses amplify or clarify information provided in the Draft EIR and/or refer the reader to the appropriate place in the document where the requested information can be found. Comments that are not directly related to environmental issues (e.g., opinions on the merits of the Project unrelated to its environmental impacts) are noted for the record. Where text changes in the Draft EIR are warranted based on comments received, updated Project information, or other information provided by City staff, those changes are noted in the response to comment and the reader is directed to Chapter 3, Changes to the Draft EIR, of this Final EIR.

The changes to the analysis contained in the Draft EIR represent only minor clarifications/amplifications and do not constitute significant new information. In accordance with CEQA Guidelines Section 15088.5, recirculation of the Draft EIR is not required.

All written comment letters received on the Draft EIR are listed in Table 2-1. All comment letters have been coded with a number to facilitate identification and tracking (see Table 2-1). These numbered comment letters were reviewed and divided into individual comments, with each comment containing a single theme, issue, or concern. Individual comments and the responses to them were assigned corresponding numbers (e.g., 1-1, 1-2, 1-3). To aid readers and commenters, electronically bracketed comments have been reproduced in this document, with the corresponding responses provided immediately following the comments.

Table 2-1. Comments Received on the Draft EIR

Comment Letter Designation	Commenter	Date
Agencies		
A1	South Coast Air Quality Management District	October 13, 2022
A2	Los Angeles County Sanitation Districts	October 13, 2022
Individuals/Public		
I1	Rodney Warner	September 11, 2022
I2	Jeff Steiman	September 29, 2022

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Comment Letter A1

Comment Letter A1



SENT VIA E-MAIL:
gguisar@carsonca.gov
Gena Guisar, Senior Planner
Community Development Department, Planning Division
City of Carson
701 East Carson Street
Carson, CA 90745

October 13, 2022

**Draft Environmental Impact Report (Draft EIR) for the Proposed
Imperial Avalon Mixed-Use Project (Proposed Project)
(SCH No.: 2021010116)**

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. The City of Carson is the California Environmental Quality Act (CEQA) Lead Agency for the Proposed Project. The following comments include information from the Community Emissions Reduction Plan (CERP) for the Assembly Bill 617 (AB 617)-designated community of Wilmington, Carson, West Long Beach (WCWLB), recommended revisions to the CEQA regional air quality impacts analysis for cleanup activities during construction, health risk reduction strategies, and information about South Coast AQMD permits that the Lead Agency should include in the Final EIR.

A1-1

South Coast AQMD Staff's Summary of Project Information in the Draft EIR

Based on the Draft EIR, the Lead Agency proposes the following involved in the Proposed Project: (1) a General Plan Amendment to change Land Use Designation from Regional Commercial and Low-Density Resident to Urban Residential; (2) to change from Commercial, Automotive and RM-8-D zone to Specific Plan; (3) to adopt the Imperial Avalon Specific Plan (IASP); (4) review site plan and design; (5) have a tentative tract map to facilitate constructions of the proposed development; and (6) to approve a development agreement¹. The Proposed Project would involve removing the existing site uses, currently developed as a mobile home park, and constructing a mixed-use neighborhood consisting of multifamily residences, townhomes, neighborhood-serving commercial uses, open space, and parking². The Proposed Project Site comprises two interconnected halves: the western portion with three-story townhomes and the eastern half with multistory mixed-use buildings of up to seven stories with a total of 1,213 residential units³. The Proposed Project is located at 21207 South Avalon Boulevard in Carson, on an approximately 27.31-acre site⁴. Based on the ariel photographs, South Coast AQMD staff found that the nearest sensitive receptors (e.g., residences) are adjacent to the west and south of the Proposed Project, approximately within 50 feet. Additionally, the Proposed Project site is within 500 feet of a

A1-2

¹ Draft EIR. Page 3-1.

² *Ibid.* Page 3-15.

³ *Ibid.*

⁴ *Ibid.* Page 3-2.

Gena Guisar

October 13, 2022

freeway, Interstate 405 (I-405). Construction activities are anticipated to begin in 2022 and last approximately 60 months⁵. Operation is expected to start in 2027⁶.

↑ A1-2
Cont.

South Coast AQMD Staff's Comments on the Draft EIR

Information from the WCWL B CERP

The Proposed Project area includes the AB 617-designated WCWL B community and is heavily impacted by air pollution generated from sources such as port-related activities and refinery-related activities. As part of the AB 617 process, South Coast AQMD is required to work with a Community Steering Committee (CSC) to develop a CERP that identifies air quality priorities and related actions to reduce air pollution in the community. The South Coast AQMD Governing Board adopted the WCWL B CERP on September 6, 2019.⁷ The Draft EIR for the Proposed Project serves as the first-tier, programmatic level environmental analysis that can provide guidance to subsequent, project-level environmental analyses. South Coast AQMD staff recommends that the Lead Agency review the actions to reduce air pollution in the community included in Chapter 5 of the adopted CERP and work with South Coast AQMD's AB 617 staff to explore whether additional mitigation measures can be identified and implemented through future development projects at the Proposed Project.

A1-3

CEQA Regional Air Quality Impacts Analysis for Cleanup Activities during Construction

Based on the Hazards and Hazardous Materials Section in the Draft EIR, the Proposed Project would include the demolition of existing structures of varying ages, which were built prior to 1978 and could contain hazardous material building, including asbestos-containing materials (AMCs), lead-based paint (LBP), or polychlorinated biphenyls (PCBs), mercury and other hazardous materials⁸. In addition, according to Appendix G-1: Phase I and Phase II Environmental Site Assessment, the report reveals various COCs in the soil above residential screening levels and soil gas at concentrations that are considered to be elevated⁹. Furthermore, detecting petroleum hydrocarbons in the soil is considered a nuisance condition¹⁰. As a result, these conditions are collectively considered recognized environmental conditions in connection with the Site¹¹. It is reasonably foreseeable that cleanup activities for remediating, controlling contaminated soil and/or groundwater, and demolition may occur prior to or concurrently with the new construction. Due to the potential of contamination, the Lead Agency proposes the Project Design Feature PDF-HAZ-1¹² and discusses the soil management plan in the event contamination is identified. However, the Lead Agency did not analyze air quality impacts from cleanup activities during construction in the Draft EIR.

A1-4

⁵ *Ibid.* Page 3-47.

⁶ *Ibid.*

⁷ South Coast AQMD. September 2019. Assembly Bill 617 Wilmington, Carson, West Long Beach Community Emissions Reduction Plan. Accessed at: <https://www.aqmd.gov/docs/default-source/ab-617-ab-134/steering-committees/wilmington/cerp/final-cerp-wcwl b.pdf>.

⁸ Draft EIR. Page 4.7-13.

⁹ Appendix G-1. Page 23.

¹⁰ *Ibid.*

¹¹ *Ibid.*

¹² Draft EIR. Page 4.2-17.

Gena Guisar

October 13, 2022

Cleanup activities will likely involve using heavy-duty, diesel-fueled trucks for soil export, resulting in emissions from truck hauling activities and vehicle trips by workers that will be required to conduct cleanup activities. Additionally, cleanup activities will likely require the use of additional equipment that may differ from typical equipment for grading and site preparation for construction. If cleanup activities are reasonably foreseeable at the time the EIR was prepared, the Lead Agency should use good faith and best efforts to provide information on the scope, types, and duration of cleanup activities, quantify emissions from cleanup activities, and include those emissions in the Proposed Project's construction emissions profile to be compared to South Coast AQMD's air quality CEQA significance thresholds for construction to determine the level of significance in the Final EIR. Alternatively, if emissions from cleanup activities are not included in the Final EIR, the Lead Agency should include a new air quality mitigation measure in the Air Quality Section of the Final EIR to commit to evaluating the potential environmental impacts from cleanup activities through CEQA prior to commencing any cleanup activities. If a new air quality mitigation measure is not included in the Final EIR, the Lead Agency should provide reasons supported by substantial evidence in the record to explain why a new air quality mitigation measure is not included.

Under the Utilities and Service Systems in the Draft EIR, the Lead Agency identifies several landfills that serve the Proposed Project, such as El Sobrante or Lancaster or Simi Valley Landfills¹³ over 40 miles from the Proposed Project site. However, the Lead Agency did not identify a specific hazardous landfill for the Proposed Project in the Draft EIR. In addition, based on the emission calculations from the California Emissions Estimator Model (CalEEMod) output files, the Lead Agency used a one-way truck trip length of 20 miles to quantify the Proposed Project's construction emissions from hauling construction materials. If cleanup activities would include removing and disposal of contaminated soil, ACMs, LBPs, or any hazardous materials, depending on the type of contamination, contaminated materials may need to be accepted at a hazardous landfill (e.g., one of the landfills mentioned above or different landfill) with a one-way truck trip length that is likely longer than 20 miles. Therefore, South Coast AQMD staff recommends that the Lead Agency identify the permitted hazardous disposal facility that the Proposed Project could use to dispose of contaminated soil if the cleanup activities involve transport and off-site disposal of contaminated soil and disclose the information in the Final EIR. When quantifying emissions from transportation and off-site disposal, the Proposed Project's construction emissions from haul truck trips for transporting and disposing of contaminated soil based on the appropriate one-way truck trip length should be recalculated. If the default one-way truck trip length of 20 miles is not re-calculated for quantifying emissions from haul truck trips for transporting contaminated soil, the Lead Agency should provide reasons for not re-calculating it supported by substantial evidence in the record.

Health Risk Strategies Reductions

Notwithstanding the court rulings, South Coast AQMD staff recognizes that the Lead Agency that approves CEQA documents retain the authority to include any additional information they deem relevant to assessing and mitigating the environmental impacts of a project. Because South Coast AQMD staff is concerned about the potential public health impacts of siting sensitive populations within proximity of sources of air pollution, it is recommended that, prior to approving future

¹³ *Ibid.* Page 4.14-3

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A1-4
Cont.

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A1-5

Gena Guisar

October 13, 2022

development projects, the Lead Agency consider the impacts of air pollutants on people who will live in a new project and provide mitigation where necessary. Additionally, South Coast AQMD staff suggests that the Lead Agency review the California Air Resources Board (CARB) Air Quality Land Use and Handbook: A Community Health Perspective¹⁴ as it is a general reference guide for evaluating and reducing air pollution impacts associated with new projects that go through the land use decision-making process with additional guidance on strategies to reduce air pollution exposure near high-volume roadways available in CARB's technical advisory¹⁵.

↑
A1-5
Cont.

Many strategies are available to reduce exposures, including, but not limited to, building filtration systems with MERV 13 or better. In some cases, MERV 15 or better is recommended, for building design, orientation, location, vegetation barriers, landscaping screening, etc. Enhanced filtration units are capable of reducing exposures. However, enhanced filtration systems have limitations. For example, in a study that South Coast AQMD conducted to investigate filters¹⁶, a cost burden is expected to be within the range of \$120 to \$240 per year to replace each filter panel. The initial start-up cost could substantially increase if an HVAC system needs to be installed and if standalone filter units are required. Installation costs may vary, including costs for conducting site assessments and obtaining permits and approvals before filters can be installed. Other costs may include filter life monitoring, annual maintenance, and training for conducting maintenance and reporting. In addition, because the filters would not have any effect unless the HVAC system is running, there may be increased energy consumption that the Lead Agency should evaluate in the EIR. It is typically assumed that the filters operate 100 percent of the time while residents are indoors, and the environmental analysis does not generally account for the times when the residents have their windows or doors open or are in common space areas of the project. These filters have no ability to filter out any toxic gases. Furthermore, when used filters are replaced, the replacement has the potential to result in emissions from the transportation of used filters at disposal sites and generate solid waste that the Lead Agency should evaluate in the Draft EIR. Therefore, any filtration unit's presumed effectiveness and feasibility should be carefully evaluated in more detail before assuming they will sufficiently alleviate exposure to diesel particulate matter emissions.

A1-6

South Coast AQMD Permits and Responsible Agency

If the implementation of the Proposed Project would require modifying the existing or use of new stationary equipment, including but not limited to emergency generators, fire water pumps, boilers, etc., permits from South Coast AQMD are required. The Final EIR should include a discussion on stationary equipment requiring South Coast AQMD permits and identify South Coast AQMD as a Responsible Agency for the Proposed Project. Any assumptions used for the stationary sources in the Final EIR will also be used as the basis for the permit conditions and limits for the Proposed Project. Please contact South Coast AQMD's Engineering and Permitting staff at (909) 396-3385 for questions on permits. For more general information on permits, please visit South Coast AQMD's webpage at: <http://www.aqmd.gov/home/permits>.

A1-7

¹⁴ California Air Resources Board (CARB) Air Quality Land Use and Handbook: A Community Health Perspective. Access at: <https://www.arb.ca.gov/ch/handbook.pdf>.

¹⁵ CARB's technical advisory can be found at: <https://www.arb.ca.gov/ch/landuse.htm>

¹⁶ This study evaluated filters rated MERV 13 or better. Accessed at: <http://www.aqmd.gov/docs/defaultsource/ceqa/handbook/aqmdpilotstudyfinalreport.pdf>. Also see 2012 Peer Review Journal article by South Coast AQMD: <https://onlinelibrary.wiley.com/doi/10.1111/ina.12013>

Gena Guisar

October 13, 2022

Conclusion

Pursuant to California Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(b), South Coast AQMD staff requests that the Lead Agency provide South Coast AQMD staff with written responses to all comments contained herein prior to the certification of the Final EIR. In addition, when the Lead Agency's position is at variance with recommendations raised in the comments, the issues raised in the comments should be addressed in detail, giving reasons why specific comments and suggestions are not accepted. There should be good faith and reasoned analysis in response. Conclusory statements unsupported by factual information will not suffice (CEQA Guidelines Section 15088(c)). Conclusory statements do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful, informative, or useful to decision-makers and to the public who are interested in the Proposed Project.

A1-8

South Coast AQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact Danica Nguyen, Air Quality Specialist, at dnguyen1@aqmd.gov should you have any questions.

A1-9

Sincerely,

Sam Wang

Sam Wang

Program Supervisor, CEQA-IGR

Planning, Rule Development & Implementation

SW:DN
LAC220921-06
Control Number

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Response to Comment Letter A1

South Coast Air Quality Management District
Samantha Wang, Program Supervisor, CEQA-IGR, Planning, Rule Development, and Implementation
October 13, 2022

A1-1 This comment states that the South Coast Air Quality Management District appreciates the opportunity to comment on the Draft EIR and provides an introduction to comments that follow.

The City acknowledges the comment as an introduction to comments that follow. This comment is included in the Final EIR for review and consideration by the City's decision-makers prior to a final decision on the Project. No further response is required or necessary.

A1-2 This comment provides a summary of the Project as described in the Draft EIR.

The comment restates information contained in the Draft EIR and does not raise an environmental issue within the meaning of CEQA. The City will include the comment as part of the Final EIR for review and consideration by the City's decision-makers prior to a final decision on the Project. No further response is required or necessary.

A1-3 This comment notes that the area in which the Project is located is heavily impacted by air pollution generated by port- and refinery-related activities, and recommends a review of the Wilmington, Carson, West Long Beach (WCWLB) Community Emissions Reduction Plan (CERP). Specifically, the comment requests a review of the "actions to reduce air pollution" contained in Chapter 5 of the CERP and requests that the Project work with South Coast AQMD's Assembly Bill 617 (AB 617) staff to identify and implement additional mitigation measures.

The City has reviewed Chapter 5 of the WCWLB CERP. While measures within the WCWLB CERP are primarily intended for operational land uses that involve heavy trucking (of which the Project does not include), applicable mitigation measures outlined in the Chapter are as follows: reduce truck idling near residential areas, reduce emissions from heavy-duty trucks, reduce exposure to harmful air pollutants in homes, and increase green space in areas where people spend time (SCAQMD 2019). Table 2 below details how the Project would be consistent with these measures.

Table 2. Consistency with WCQLB CERP Mitigation Measures

Measure ¹	Discussion
Chapter 5d – Action 1: Reduce Truck Idling	Consistent. Project construction would comply with the California Code of Regulations, Title 13, Section 2449(d)(3) and 2485, which minimizes the idling time of construction equipment (including heavy-duty haul trucks) either by shutting it off when not in use or by reducing the time of idling to no more than 5 minutes. During operation, the Project would not generate significant truck deliveries (given that the only Project component that would require deliveries would be the Project's neighborhood serving commercial use), delivery trucks to commercial uses within the Project site would similarly be required to comply with this rule.
Chapter 5d – Action 2: Reduce Emissions from Heavy-Duty Trucks	Consistent. The Project would involve the use of heavy-duty trucks during construction. Construction would be required to comply with Regulations, Title 13, Section 2025, which requires that DPM filters be

Table 2. Consistency with WCQLB CERP Mitigation Measures

Measure ¹	Discussion
	applied to heavy trucks. Compliance with this regulation would assist in reducing the emissions of DPM from heavy-duty trucks. Similarly, once operational, the limited number of trucks accessing the Project’s neighborhood serving commercial areas for deliveries would also be required to comply with this measure.
Chapter 5g – Action 3: Reduce Exposure to Harmful Air Pollutants in Homes	Consistent. The Project involves the incorporation of enhanced building filtration systems with a MERV rating of 13 in accordance with the energy efficiency standards of Title 24 (California Building Standards Code) and commensurate with the ASHRAE Standard 52.2. The MERV 13 filters have an estimated particle removal efficiency of 90% for PM ₁₀ , 85% of PM _{2.5} , and 50% of DPM. As such, the incorporation of MERV 13 filters would reduce the exposure of future occupants of the Project to particulate matter from existing sources of air pollution. In addition, although not required by CEQA, as part of the Project planning process, a Freeway Health Risk Assessment was prepared to evaluate the potential effects of pollutants on individuals who would utilize/reside on the Project site (Appendix A). The Freeway Health Risk Assessment determined that the carcinogenic and non-carcinogenic risks for occupants of the Project would be below acceptable thresholds of significance with installation of the building filtration systems, as proposed.
Chapter 5g – Action 4: Increase Green Space in Areas Where People Spend Time	Consistent. The Project involves substantial green space through the development, including a robust landscaping plan, a network of intervening greenbelts and green spaces through the Project, and a public park.

¹Source: SCAQMD 2019.

Note: ASHRAE = American Society of Heating, Refrigerating and Air Conditioning Engineers; DPM = diesel particulate matter; MERV = minimum efficiency reporting value; PM₁₀ = coarse particulate matter; PM_{2.5} = fine particulate matter.

While the Project is consistent with the measures identified within Chapter 5 of the WCWLB CERP, it should be noted that the Draft EIR determined that the Project’s air quality impacts would be less than significant. CEQA Guidelines Section 15126.4(3) provides that mitigation measures are not required for effects which are not found to be significant. As such, inclusion of these mitigation measures within the Draft EIR is not warranted.

Additionally, the comment states that the Draft EIR serves as the first-tier, programmatic level environmental analysis that can provide guidance to subsequent, project-level environmental analyses. However, as discussed in Chapter 2, Introduction, of the Draft EIR, the Draft EIR is a “project-level” document that analyzes the impacts of both the Imperial Avalon Specific Plan and the proposed development project (i.e., a mixed-use development involving the construction and operation of 1,213 residential units and 10,350 square feet of commercial space). Should the City choose to approve the Project or a Project Alternative that is less impactful than the Project, the Project Applicant will be limited to constructing the development approved by the City. As such, no future development projects other than the Project (or selected Project Alternative) would be permitted

As such, the analysis presented in the Draft EIR is adequate as provided and no revisions to the Draft EIR are necessary.

A1-4 This comment expresses a concern regarding the Draft EIR's analysis of the Project's regional air quality impacts associated with potential cleanup activities during construction of the Project. The comment references a Project Design Feature to prepare a Soil Management Plan to address the potential for contaminated soil or groundwater, which was included as part of the Project to ensure the health and safety of contractors conducting earthwork activities during construction given the presence of limited quantities of contaminants of concern in subsurface soils of the Project site. The comment states that if the Project would require disposal of materials at a licensed hazardous landfill, the emissions associated with the transport of such materials to an approved disposal facility via heavy-duty, diesel-fueled trucks should be included within the Project's air quality analysis and compared to SCAMD's air quality CEQA significance thresholds for construction. The comment expresses a concern that the transport of hazardous materials to a hazardous landfill facility may require a longer trip length (and by extension, greater air pollutant emissions) than the transport of non-hazardous materials at a non-hazardous landfill facility, given that hazardous materials are fewer and farther between than non-hazardous landfill facilities. The comment notes that the Draft EIR's air quality analysis assumed that construction and demolition debris would be transported approximately 20 miles, and a one-way trip length of greater than 20 miles may be warranted in the event that contaminated soils are encountered requiring disposal at a hazardous materials landfill.

As discussed within Section 4.7, Hazards and Hazardous Materials, of the Draft EIR, limited quantities of contaminants of concern are present within the subsurface of the Project site. However, as discussed within Section 4.7, the Project's grading and construction plans call for significant grading activities that would involve reworking existing soils with supplemental fills to create a sufficient foundation for the Project. The reworking of on-site soils is anticipated to result the dilution of contaminants of concern to levels that do not pose health risks to occupants of the site. In addition, a vapor barrier would be installed beneath building foundations that prevents any vapor intrusion from adversely affecting occupants. As such, no export of excavated materials is anticipated, and no off-site disposal of hazardous soils is warranted. Accordingly, no mitigation measure to evaluate new air quality impacts from clean up activities is warranted. It should be noted that CEQA requires an analysis of reasonably foreseeable direct and indirect physical changes in the environment which may be caused by a project (CEQA Guidelines Section 15064). Given that extensive investigation of subsurface contamination has been undertaken indicating no offsite disposal of soils is necessary (constituting substantial evidence in the record), off-site disposal is not a reasonably foreseeable action and further analysis of such an action is not warranted. As such, the analysis of the Project's air quality impacts in the Draft EIR is adequate as presented and no revisions to the Draft EIR are necessary.

A1-5 This comment expresses a concern regarding the proximity of the Project to sources of air pollution (such as Interstate 405) and recommends that the City consider the potential pollutant impacts on local populations. Furthermore, the commenter suggests that the City review the California Air Resources Board (CARB) Air Quality Land Use and Handbook: A Community Health Perspective to inform evaluation of new projects near high-volume roadways.

The Project would be located within 500 feet of Interstate 405. According to the CARB Air Quality Land Use and Handbook: A Community Health Perspective, it is not recommended that residential uses be placed within 500 feet of freeways and highways. As part of the planning process, the City carefully considered the effects of siting the Project proximate to this source of air pollution. Although not required by CEQA, a Freeway Health Risk Assessment was prepared through the City's Specific Plan

process to evaluate the potential effects of pollutants on individuals who would utilize/reside on the Project site (Appendix A)¹. The Freeway HRA concluded that carcinogenic risk estimates for the maximum exposed residential receptors did not exceed the significance threshold of one in one million over 30 years. Short duration exposures were predicted to be within acceptable limits for noncarcinogenic hazards and were within acceptable limits for maximum carbon monoxide (CO) and nitrogen dioxide (NO₂) concentrations. For residential receptors, maximum predicted particulate (PM₁₀ and PM_{2.5}) concentrations did not exceed thresholds for all occupancies with installation of proposed filtration (i.e., building filtration systems with a minimum efficiency reporting value rating of 13, which is required by Title 24 of the California Building Standards Code). As such, the City has completed its due diligence through the land use process by considering the impacts of air pollutants on future occupants of the Project. Given that no health risk impacts to the future occupants of the Project were identified, no additional health risk reduction strategies are warranted.

A1-6 This comment elaborates on Comment A1-5 and provides strategies to reduce exposures to harmful air pollutants on occupants of a project, such as building filtration systems with a minimum efficiency reporting value of 13 or better. Additionally, the comment provides factual information regarding potential limitations, burdens, and other concerns regarding building filtration systems, including increased costs, maintenance, energy use, the inability to filter pollutants when a system is not running or when windows are open/occupants are in open common space areas, emissions resulting from the transportation of used filters to disposal sites, and the generation of solid waste when filters are discarded.

As discussed within Response to Comment A1-5, Project buildings would be equipped with building filtration systems with a minimum efficiency reporting value of 13, as required by Title 24 of the California Building Standards Code. The City has carefully considered the limitations, burdens, and other concerns raised by the comment pertaining the use of enhanced building filtration systems. These considerations are discussed below.

Cost. Given that MERV 13 filters are required per 2019 Title 24 standards, costs are considered to be associated with owning or operating any new residential development and results in a health benefit. Notwithstanding, this information is factual background information and not a concern under CEQA. It is nonetheless included in the Final EIR for review and consideration by the City's decision-makers prior to a final decision on the Project. No further response is required or necessary

Inability to Filter Toxic Gases and Ineffectiveness when Filters are not Running or Doors/Windows are Open. The City acknowledges that MERV 13 filters would neither reduce pollutant exposure when residents are outside within the perimeter of the Project or with an open window, nor would they filter toxic gases. These considerations were taken into account during preparation of the Freeway Health Risk Assessment, which includes short duration exposures when occupants are using open space common areas, such as pools, parks, and related amenities. Taking this into account, the Freeway

¹ The California Supreme Court stated in *California Building Industry Association v. Bay Area Air Quality Management District* (2015) (62 Cal.4th 369) that an ordinary CEQA analysis should be concerned with a project's impact on the environment, rather than with the environment's impact on a projects and its users or residents. Because the Freeway Health Risk Assessment evaluates the effects of the existing environment on the Project, and not the Project on the environment, the Freeway Health Risk Assessment was not included within the Draft EIR. Nonetheless, it is included within this Final EIR as Appendix A and will be made available to the City's decision-makers for their consideration outside of the scope of CEQA.

Health Risk Assessment concluded the siting of the Project near an existing source of toxic air contaminants would not result in a health risk (cancer or chronic). Moreover, please refer to Response to Comment A1-5, which explains that while this concern is an important planning consideration, the topic is not an environmental concern under CEQA. This comment is nonetheless included in the Final EIR for review and consideration by the City's decision-makers prior to a final decision on the Project. No further response is required or necessary.

Increased Energy Consumption. Project-generated energy emissions were estimated using the California Emissions Estimator Model, which is the industry standard emission estimator model recommended by the SCAQMD. Energy consumption associated with operating a heating, ventilation, and air conditioning unit, which the MERV 13 filters are a component of, is incorporated into the CalEEMod energy use assumptions for the Project. As such, the increased energy consumption and area source emissions associated with installation of the enhanced building filtration system were included within the Draft EIR's analysis. As such, the Draft EIR is adequate as provided and no revisions to the Draft EIR are necessary.

Generation of Solid Waste and Emissions Generated from Transport of Discarded Filters to Landfills. The Draft EIR included an analysis of the Project's solid waste generation in consideration of existing landfill capacity, as well as an analysis of operational characteristics, including the transport of solid waste to landfill facilities. The Project's solid waste generation was based on default values for the proposed land uses within CalEEMod. CalEEMod considers all types of solid waste generated by a Project, including air filters, as well emissions associated with the transport of waste to a landfill. As such, these considerations have been accounted for within the Draft EIR's analysis. The analysis within the Draft EIR is adequate as provided and no revisions to the Draft EIR are necessary.

As discussed above, the City has carefully considered the potential limitations of the Project's filtration systems and accounted for the effects of such systems within the Draft EIR. As such, the Draft EIR is adequate as provided and no revisions to the Draft EIR are necessary.

A1-7 This comment states that if implementation of the Project would require modifying the existing use of existing stationary equipment or the installation of new stationary equipment, including but not limited to emergency generators, fire water pumps, boilers, etc., permits from SCAQMD are required. The comment states that the Final EIR should include a discussion on stationary equipment requiring SCAQMD permits and identify SCAQMD as a responsible Agency for the Project. The Project would not include modifying the existing use of existing stationary equipment or the installation of new stationary equipment.

The City notes the comment provides factual background information regarding the regulatory permitting process. Given that no stationary equipment requiring permits from SCAMD are anticipated to be used during the Project, the Draft EIR is adequate as provided. The City will include the comment as part of the Final EIR for review and consideration by the City's decision-makers prior to a final decision on the Project. No further response is required because the comment does not raise an environmental issue.

A1-8 This comment requests that all comments be addressed thoroughly and written responses provided to SCAQMD. The City has provided the South Coast Air Quality Management District with a copy of

SCAQMD's bracketed comment letter and this associated response on November 11, 2022 via email and FedEx delivery to the SCAQMD offices.

The City notes the comment provides factual information and does not raise an environmental issue within the meaning of CEQA. The City will include the comment as part of the Final EIR for review and consideration by the City's decision-makers prior to a final decision on the Project. No further response is required because the comment does not raise an environmental issue.

- A1-9** This comment provides contact information should the City have any questions regarding the comments provided in SCAQMD's comment letter. The City acknowledges the comment and notes it provides concluding remarks that do not raise new or additional environmental issues concerning the adequacy of the Draft EIR. For that reason, the City provides no further response to this comment. Nonetheless, the City thanks SCAQMD for their review of the Project and reiterates that it will coordinate with SCAQMD as applicable as the Project progresses through the planning and development process.

Comment Letter A2



Comment Letter A2

Robert C. Ferrante
Chief Engineer and General Manager

1955 Workman Mill Road, Whittier, CA 90601-1400
Mailing Address: P.O. Box 4998, Whittier, CA 90607-4998
(562) 699-7411 • www.lacsd.org

October 13, 2022

Rcf. DOC 6699413

Ms. Gena Guisar, Planner
City of Carson
Community Development Department
Planning Division
701 East Carson Street
Carson, CA 90745

Dear Ms. Guisar:

DEIR Response to Imperial Avalon Mixed-Use Project

The Los Angeles County Sanitation Districts (Districts) received a Draft Environmental Impact Report (DEIR) for the subject project on September 19, 2022. The proposed project is located within the jurisdictional boundaries of District No. 8. Previous comments submitted by the Districts to your agency in correspondence dated February 9, 2021 (copy enclosed), still apply to the subject project with the following updated information: A2-1

1. A portion of the wastewater flow originating from the proposed project will discharge to a local sewer line, which is not maintained by the Districts, for conveyance to the Districts' Grace Street Sections 2 and 3 Trunk Sewer, located in East 213th Street at South Avalon Boulevard. The Districts' 15-inch diameter trunk sewer has a capacity of 1.3 million gallons per day (mgd) and conveyed a peak flow of 0.5 mgd when last measured in 2015. Altering a connection to a Districts' trunk sewer requires approval by the Districts. A2-2

2. The remaining wastewater flow originating from the proposed project will discharge directly to the Districts' Grace Street Section 1 Trunk Sewer, located in South Gracc Avnuc, north of East 213th Street. The Districts' 11.1-inch diameter trunk sewer has a capacity of 1.1 mgd and conveyed a peak flow of 0.5 mgd when last measured in 2015. A 6-inch diameter or smaller direct connection to a Districts' trunk sewer requires a Trunk Sewer Connection Permit issued by the Districts. An 8-inch diameter or larger direct connection to a Districts' trunk sewer requires submittal of Sewer Plans for review and approval by the Districts. A2-3

3. For additional information regarding altering an existing connection or establishing a direct connection to a Districts' trunk sewer, please contact the Districts' Engineering Counter at engineeringcounter@lacsd.org or (562) 908-4288, extension 1205. A2-4

4. The expected average wastewater flow from the project, described in the DEIR as 833 apartment units, 380 townhome units, and 10,352 square feet commercial uses, is 178,832 gallons per day, after all structures on the project site are demolished. A2-5

DOC 6725751.D08

Ms. Gena Guisar

2

October 13, 2022

If you have any questions, please contact the undersigned at (562) 908-4288, extension 2743, or mandyhuffman@lacsdc.org. A2-6

Very truly yours,

Mandy Huffman

Mandy Huffman
Environmental Planner
Facilities Planning Department

MNH:mnh

Enclosure

cc: A. Schmidt
A. Howard
R. Paracuelles
Engineering Counter

DOC 6725751.D08



Robert C. Ferrante
Chief Engineer and General Manager
1955 Workman Mill Road, Whittier, CA 90601-1400
Mailing Address: P.O. Box 4998, Whittier, CA 90607-4998
(562) 699-7411 • www.lacsd.org

February 9, 2021

Ref. DOC 6032953

Ms. Gena Guisar, Contract Planner
Community Development Department
City of Carson
701 East Carson Street
Carson, CA 90745

Dear Ms. Guisar:

NOP Response for Imperial Avalon Mixed-Use Project

The Los Angeles County Sanitation Districts (Districts) received a Notice of Preparation of a Draft Environmental Impact Report (NOP) for the subject project on January 14, 2021. The proposed project is located within the jurisdictional boundary of District No. 8. We offer the following comments regarding sewerage service:

1. The wastewater flow originating from the proposed project will discharge to a local sewer line, which is not maintained by the Districts, for conveyance to the Districts' Grace Street Trunk Sewer, located in 213th Street at Avalon Boulevard. The Districts' 15-inch diameter trunk sewer has a capacity of 1.3 million gallons per day (mgd) and conveyed a peak flow of 0.3 mgd when last measured in 2015.
2. The wastewater generated by the proposed project will be treated at the Joint Water Pollution Control Plant located in the City of Carson, which has a capacity of 400 mgd and currently processes an average flow of 261.1 mgd.
3. The expected increase in average wastewater flow from the project site, described in the notice as 833 residential apartment units, 380 townhomes, and 7,152 square feet of commercial space, is 186,716 gallons per day, after the structures on the project site are demolished. For a copy of the Districts' average wastewater generation factors, go to www.lacsd.org, under Services, then Wastewater Program and Permits, select Will Serve Program, and scroll down to click on the [Table 1, Loadings for Each Class of Land Use](#) link.
4. The Districts are empowered by the California Health and Safety Code to charge a fee to connect facilities (directly or indirectly) to the Districts' Sewerage System or to increase the strength or quantity of wastewater discharged from connected facilities. This connection fee is a capital facilities fee that is used by the Districts to upgrade or expand the Sewerage System. Payment of a connection fee may be required before this project is permitted to discharge to the Districts' Sewerage System. For more information and a copy of the Connection Fee Information Sheet, go to www.lacsd.org, under Services, then Wastewater (Sewage) and select Rates & Fees. In determining the impact to the Sewerage System and applicable connection fees, the Districts will determine the user category (e.g. Condominium, Single Family home, etc.) that best represents the actual or anticipated use of the parcel(s) or facilities on the parcel(s) in the development. For more specific information regarding the connection fee application procedure and fees, the developer should contact the Districts' Wastewater Fee Public Counter at (562) 908-4288, extension 2727.

A2-7

DOC 6060956.D08

Ms. Gena Guisar

2

February 9, 2021

5. In order for the Districts to conform to the requirements of the Federal Clean Air Act (CAA), the capacities of the Districts' wastewater treatment facilities are based on the regional growth forecast adopted by the Southern California Association of Governments (SCAG). Specific policies included in the development of the SCAG regional growth forecast are incorporated into clean air plans, which are prepared by the South Coast and Antelope Valley Air Quality Management Districts in order to improve air quality in the South Coast and Mojave Desert Air Basins as mandated by the CCA. All expansions of Districts' facilities must be sized and service phased in a manner that will be consistent with the SCAG regional growth forecast for the counties of Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial. The available capacity of the Districts' treatment facilities will, therefore, be limited to levels associated with the approved growth identified by SCAG. As such, this letter does not constitute a guarantee of wastewater service, but is to advise the developer that the Districts intend to provide this service up to the levels that are legally permitted and to inform the developer of the currently existing capacity and any proposed expansion of the Districts' facilities.

A2-7
Cont.

If you have any questions, please contact the undersigned at (562) 908-4288, extension 2717 or at araza@lacsdsd.org.

Very truly yours,



Adriana Raza
Customer Service Specialist
Facilities Planning Department

AR:ar

cc: A. Schmidt
A. Howard

DOC 6060956.D08

Response to Comment Letter A2

Los Angeles County Sanitation Districts
Many Huffman, Environmental Planner, Facilities Planning Department
October 13, 2022

A2-1 This comment is an introduction by the Los Angeles County Sanitation Districts (Districts) indicating that they received the Draft Environmental Impact Report (EIR) and that the Project is located within the Districts' jurisdictional boundaries (specifically, District No. 8). The comment also states that the Districts have previously provided comments to the City (submitted as scoping comments during the Notice of Preparation [NOP] process) and that the Districts' previous comments still apply to the Project. In general, these previously submitted comments provided information about wastewater conveyance and treatment services in the Project area and recommended information to the City to be considered and/or included within the Draft EIR. These previous comments were addressed within Chapter 1, Introduction, and Section 4.14, Utilities and Service Systems, of the Draft EIR.

The City acknowledges the comment as an introduction to comments that follow. This comment is included in the Final EIR for review and consideration by the City's decision-makers prior to a final decision on the Project. No further response is required or necessary.

A2-2 This comment provides summary information about the Project's proposed sewer connections, stating that a portion (67%) of the wastewater flow originating from the Project would discharge into a local sewer line not maintained by the Districts (i.e., a County of Los Angeles Department of Public Works 8-inch sewer line), for conveyance into the District's Grace Street Sections 2 and 3 Trunk Sewer, located in East 213th Street at South Avalon Boulevard. The comment states that the District's 15-inch diameter trunk sewer has a capacity of 1.3 million gallons per day. The City acknowledges this information and notes that it was accurately summarized as presented within Section 4.14 of the Draft EIR, as well as within the Project's Sewer Area Study (Appendix L-3). As discussed within the Draft EIR and Sewer Area Study, this existing sewer line has adequate capacity to accommodate the Project's wastewater flows. Additionally, the comment states that altering a connection to a Districts' trunk sewer requires approval by the Districts. The City acknowledges this information and will require the Project Applicant to coordinate with the Districts regarding the Project's proposed minor alteration of the connection to the Districts' trunk sewer within Grace Street Sections 2 and 3.

The comment restates information contained in the Draft EIR and provides factual permitting information and does not raise an environmental issue within the meaning of CEQA. The City will include the comment as part of the Final EIR for review and consideration by the City's decision-makers prior to a final decision on the Project. No further response is required or necessary.

A2-3 This comment provides summary information about the Project's proposed sewer connections, stating that the remaining portion (37%) of the wastewater flow originating from the Project would discharge directly to the Districts' Grace Street Section 1 Trunk Sewer, located in South Grace Avenue, north of East 213th Street. The City acknowledges this information and notes that it was accurately summarized as presented within Section 4.14 of the Draft EIR, as well as within the Project's Sewer Area Study (Appendix L-3). As discussed within the Draft EIR and Sewer Area Study, the Section 1 Trunk Sewer is adequately sized to convey this portion of the Project's wastewater flows. Additionally, the comment states that a 6-inch diameter or smaller direct connection to a District's trunk sewer requires a Trunk

Sewer Connection Permit issued by the Districts, and an 8-inch diameter or larger direct connection to a Districts' trunk sewer requires submittal of Sewer Plans for review and approval by the Districts. The City acknowledges this information and will require the Project Applicant to obtain the applicable permit from the Districts prior to connecting to the Districts' Grace Street Section 1 Trunk Sewer.

A2-5 The comment restates information contained in the Draft EIR and provides factual permitting information and does not raise an environmental issue within the meaning of CEQA. The City will include the comment as part of the Final EIR for review and consideration by the City's decision-makers prior to a final decision on the Project. No further response is required or necessary.

This comment provides contact information pertaining to the alteration of an existing connection or establishing a direct connection to a District's trunk sewer. The City notes the comment provides factual background information and does not raise an environmental issue within the meaning of CEQA. The City will include the comment as part of the Final EIR for review and consideration by the City's decision-makers prior to a final decision on the Project. No further response is required because the comment does not raise an environmental issue.

A2-6 This comment provides summary information about the Project's anticipated wastewater flows as described in the Draft EIR.

The comment restates information contained in the Draft EIR and does not raise an environmental issue within the meaning of CEQA. The City will include the comment as part of the Final EIR for review and consideration by the City's decision-makers prior to a final decision on the Project. No further response is required or necessary.

A2-7 This comment provides contact information should the City have any questions regarding the comments provided in the Districts' comment letter. The City acknowledges the comment and notes it provides concluding remarks that do not raise new or additional environmental issues concerning the adequacy of the Draft EIR. For that reason, the City provides no further response to this comment. Nonetheless, the City thanks the Districts for their review of the Project and reiterates that it will require the Project Applicant to coordinate with the Districts as the Project progresses through the planning and development process.

A2-4 This comment is an attachment to the District's comment letter and is a copy of a scoping comment letter provided by the Districts during the Project's Notice of Preparation and scoping process. As discussed in Response to Comment A2-1, these comments provide information about wastewater conveyance and treatment services in the Project area and recommended information to the City to be considered and/or included within the Draft EIR. These previous comments were addressed within Chapter 1, Introduction, and Section 4.14, Utilities and Service Systems, of the Draft EIR. As these comments were previously addressed within the Draft EIR, they do not raise new environmental concerns warranting further response.

Comment Letter I1

Comment Letter I1

From: Rodney Warner
Sent: Sunday, September 11, 2022 8:19 PM
To: Gena Guisar
Subject: 21207 S. Avalon Bl. Draft Environmental Impact Report (EIR)

Dear Gena Guisar,

We have requests and questions about the report.

<https://ci.carson.ca.us/communitydevelopment/imperialavalon.aspx>

I1-1

Requests

- Please send the final copy of the agreement (e.g., laws, policies, resolutions, reports) between the Park Owner Imperial Avalon LLC) and City Council.

I1-2

Questions

- Are Imperial Avalon Mobile Estates residents confined to the Age-Restricted Multifamily units which only includes studios and one-bedrooms?
- Why does the Live-Work Performance Standard section PM not specify maximum levels, unit of measurement and hours of operation.
- Why is the maximum interior noise level 45 dBA in the Noise Attenuation section low? This sound barrier requirement is insufficient. No one wants to hear their neighbors.
- Will telecommunications include fiber optic infrastructure?
- The Construction section implies that Resolution No. 20-113's Option C will not complete its execution for 32 to 60 months (up to 5 years). The remuneration to the current residents of Imperial Avalon Mobile Estates is insufficient for this period of time. The owner is only offering a wholesale value instead of **fair market retail** of their homes equity and then expect that the homeowner's equity to subsidize his Option C. That equity was meant for retirement and old age expenses. Further, the remuneration required by the owner should not expire until the appropriate dwellings are completely move-in ready.

I1-3

I1-4

I1-5

I1-6

I1-7

Will the City and Park Owner provide the homeowners with the traditional real estate fair market value of their homes.

I1-8

Will the City and Park Owner provide the homeowners with sufficient remuneration to survive a 5 year displacement period?

I1-9

Thank you for your prompt response.
 Rodney Warner

I1-10

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Response to Comment Letter I1

Rodney Warner
September 11, 2022

Preface: This Comment Letter includes questions relating to the closure of the Imperial Avalon Mobile Home Park (Mobile Home Park) and its associated Relocation Impact Report (RIR). It should be noted that the closure of the Mobile Home Park is not part of the Project or related to the Project, Draft EIR, or any other approvals or reports associated with the Project. As discussed in Chapter 3, Project Description, of the Draft EIR, in September 2019, the owner of the Mobile Home Park, Imperial Avalon, LLC (Mobile Home Park Owner; the Mobile Home Park Owner is also the Project Applicant), notified Mobile Home Park residents of its intention to close the Mobile Home Park. Closures of mobile home parks within the City are subject to Carson Municipal Code Section 9128.21, which requires the preparation of a RIR which requires that park owners take reasonable measures to reduce the adverse impact of a closure on the ability of park residents to find alternative housing. After compliance with Carson Municipal Code Section 9128.21 and approval of a RIR by the Carson Planning Commission (or the City Council, if the Planning Commission's approval of a RIR is appealed), park owners have a property right under State law to close a park at their discretion, subject to issuance of a 6-month notice of termination of the residents' tenancies in their space leases. The Park Owner completed its application for approval of a RIR, RIR No. 05-20, in April of 2020 by filing its RIR. A Planning Commission hearing to consider the RIR was conducted on May 13, 2020. At this hearing, the Planning Commission approved RIR No. 05-20 and associated measures with special conditions. This decision was subsequently appealed to the City Council, by adoption of Resolution No. 20-113. On July 7, 2020 the City Council affirmed the Planning Commission's approval of RIR No. 05-20 and imposed additional conditions and relocation requirements. A Notice of Exemption for the RIR was filed with the Los Angeles County Clerk-Recorder on July 7, 2020 and was posted for a 30-day period from July 17, 2020 through August 17, 2020. No challenges to the City's approval of the RIR were timely filed.

CEQA Guidelines Section 15088(a) provides that a lead agency shall respond to comments raising significant environmental issues received. Given that many of the comments within this comment letter pertain to the closure of the Mobile Home Park and the RIR, which is unrelated to the proposed Project/Draft EIR, and do not raise significant environmental issues pertaining to the Project, responses are provided only to comments pertaining to the Project and environmental issues under the scope of CEQA.

- I1-1** This comment includes introductory remarks. The City acknowledges the comment as an introduction to comments that follow. This comment is included in the Final EIR for review and consideration by the City's decision-makers prior to a final decision on the Project. No further response is required or necessary.
- I1-2** This comment requests a copy of the RIR for the closure of the Mobile Home Park. Although not related to the Project or the Draft EIR, a copy of the RIR for was provided to the commenter via email at the time the comment was received. Given that this comment does not raise new or additional environmental issues concerning the adequacy of the Draft EIR and is unrelated to the Project, no further response to this comment is necessary within this Final EIR.
- I1-3** This comment raises a question regarding whether residents of the Mobile Home Park would be limited to the Project's studio and one bedroom age-restricted multifamily units. This question is raised within the context that, as part of the RIR, the Park Owner is obligated to provide Mobile Home Park residents with the option to move into units of the Project, once constructed. A response to this question was

provided to the commenter via email at the time the comment was received. However, as discussed in the preface to this response, the RIR and its associated terms are not part of the Project or germane to the Project's CEQA analysis. Given that this comment does not raise new or additional environmental issues concerning the adequacy of the Draft EIR and is unrelated to the Project, no further response to this comment is necessary within this Final EIR.

- I1-4** This comment raises a question as to why the live-work performance standard section of the Imperial Avalon Specific Plan does not include maximum levels, units of measurement, or hours of operations.

The live-work performance standards of the IASP were developed with the intent of addressing potential nuisances that could arise as residents work from home. However, nuisances would primarily be addressed by existing City regulations, covenants, conditions, and regulations, homeowner association regulations, and leasing agreements. Thus, the performance standards were deemed acceptable for use within the Specific Plan.

Given that this comment does not raise new or additional environmental issues concerning the adequacy of the Draft EIR, no further response to this comment is necessary.

- I1-5** This comment raises a question with regard to the 45 decibel maximum interior noise level standard within the Imperial Avalon Specific Plan. The comment expresses a concern that the maximum interior noise level standard should be lower to avoid noise trespass between units.

The Carson General Plan Noise Element, Policy N-7-3 requires that new residential construction include sound attenuation measures that reduce the interior noise level for residences to 45 dBA CNEL. The Imperial Avalon Specific Plan employs this standard. The standard is intended to apply to noise sources exterior to the building, not the transmission of noise between neighboring units of a multi-family housing development. Performance standards for the isolation of sound between adjacent living units in a multi-family residential development are governed by the California Uniform Building Code, Title 24, Part 2.5, with which the building construction would need to comply.

Given that this comment does not raise new or additional environmental issues concerning the adequacy of the Draft EIR, no further response to this comment is necessary.

- I1-6** This comment raises a question with regard to whether the Project would include fiber optic infrastructure. At this time, it is unknown whether the Project would include fiber optic infrastructure. The provision of fiber optic service at the Project is dependent on the availability of fiber optic carriers at the time of Project construction. Given that this comment does not raise new or additional environmental issues concerning the adequacy of the Draft EIR, no further response to this comment is necessary.

- I1-7** This comment raises questions regarding the terms RIR for the Mobile Home Park. Please refer to the preface to this response in which it is discussed that the RIR and Mobile Home Park closure are unrelated to the Project and are not germane to the Project's CEQA analysis. Given that this comment does not raise new or additional environmental issues concerning the adequacy of the Draft EIR and is unrelated to the Project, no further response to this comment is necessary within this Final EIR.

- I1-8** This comment raises questions regarding the terms of the RIR for the Mobile Home Park. Please refer to the preface to this response in which it is discussed that the RIR and Mobile Home Park closure are unrelated to the Project and are not germane to the Project's CEQA. Given that this comment does not raise new or additional environmental issues concerning the adequacy of the Draft EIR and is unrelated to the Project, no further response to this comment is necessary within this Final EIR.
- I1-9** This comment raises questions regarding the terms of the RIR for the Mobile Home Park. Please refer to the preface to this response in which it is discussed that the RIR and Mobile Home Park closure are unrelated to the Project and are not germane to the Project's CEQA analysis. Given that this comment does not raise new or additional environmental issues concerning the adequacy of the Draft EIR and is unrelated to the Project, no further response to this comment is necessary within this Final EIR.
- I1-10** This comment includes concluding remarks. The City acknowledges the comment and notes it does not raise new or additional environmental issues concerning the adequacy of the Draft EIR. For that reason, the City provides no further response to this comment. Nonetheless, the City thanks the commenter for their participation in the planning process.

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Comment Letter I2

Comment Letter I2

From: Jeff Steiman
Sent: Thursday, September 29, 2022 6:20 AM
To: Gena Guisar
Subject: EIR Imperial Avalon Mobile Estates-Thank you for speaking with me

Ms. Guisar,

Thank you for speaking with me on 9/28, Wednesday, regarding the EIR as part of the project where Imperial Avalon Mobile Estates now sits.

I2-1

When we spoke, I had asked you who actually writes the alternatives and we didn't circle back to that question. You had explained that the alternatives are required by CEQA as part of the process.

If you would, please explain in more detail who or which entity specifically is actually responsible for writing them. The fact they need to be included may be "cookie cutter," but the alternatives themselves have to pertain to whichever project they relate. As such, I would think the authors of the alternatives would need to be independent to make sure their is no bias towards the developer or other entity that stands to benefit somehow from the project's success.

I2-3

If this is something that has to be explained by another for certain reasons, please include contact information as well.

I2-3

Thank you again.

Jeff Steiman

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Response to Comment Letter I2

Jeff Steiman
September 29, 2022

- I2-1** This comment includes introductory remarks. The City acknowledges the comment as an introduction to comments that follow. This comment is included in the Final EIR for review and consideration by the City's decision-makers prior to a final decision on the Project. No further response is required or necessary.
- I2-2** This comment raises a question regarding the Draft EIR's Alternatives analysis, requesting information regarding who authored the analysis. The comment also expresses a concern that the Alternatives analysis should be prepared by an independent party to ensure an unbiased analysis.

The Draft EIR included the Project's alternatives analysis. The analysis was prepared by the City's environmental consultant, Dudek. Dudek is one of several pre-qualified "on-call" environmental consultants the City uses to prepare environmental documents. The City has worked with Dudek for many years on several projects throughout the City. The purpose of the "on-call" system is to have a list of experienced and qualified consultants that the City can call upon to prepare environmental documents on behalf of the City under its guidance, independent of project proponents. It should be noted that many of the technical studies included within the Draft EIR were prepared by consultants provided by the Project Applicant. To ensure the integrity of these studies, Dudek's technical staff peer reviewed each of the Applicant-prepared studies for accuracy, consistency, and technical adequacy. Many of these studies, following review by Dudek, required revisions based on the conducted peer reviews. The incorporation of those ensured the supporting analysis was complete and adequate for use in the Draft EIR.

As part of the preparation of the Draft EIR's alternative analysis, Dudek worked with the City to develop a "reasonable range" of alternatives that would feasibly attain most of the basic objectives of the project. The Project Objectives are discussed in detail within Chapter 3, Project Description, of the Draft EIR. In general, they involve creating a new mixed-use development within the City's core that furthers the land use, economic development, and urban design goals of the City's General Plan.

City staff then worked with Dudek's planners to brainstorm a list of potential uses that could theoretically be developed on the Project site, taking into account the current zoning as well as existing land use trends within the City and region. During this process, the Project Applicant was contacted by the City and Dudek to determine the feasibility of alternatives, given that they would be the party responsible for developing whichever alternative may be selected for approval by the City's Planning Commission and City Council. This coordination with the Project Applicant was deemed prudent and necessary by City staff as part of the alternatives development process. Ultimately, the City and Dudek had the final determination in which alternatives to consider.

This initial list of alternatives was then split into two categories: alternatives considered and eliminated during the project planning process and alternatives considered for further analysis. Alternatives considered and eliminated during the planning process included alternative sites, higher density residential uses, and commercial uses. These alternatives were eliminated from further consideration due to infeasibility, their failure to meet the Project's objectives, and their inability to lessen the

Project's environmental impacts. As discussed in Chapter 6, Alternatives, of the Draft EIR, alternatives considered for further analysis included two no-project alternatives, an alternative involving development consistent with the existing General Plan/Zoning designations, and a reduced density alternative. In particular, the reduced density alternative was developed as a way to bridge the gap between the proposed Project and concerns raised during the scoping process about density, scale, and neighborhood compatibility. This alternative involves a development similar to and within the same footprint as the Project but involving a lower density residential component that also includes detached townhomes along the western perimeter of the Project site to provide a more sensitive and appropriate transition to the adjacent single family residential neighborhood..

Each of these alternatives were evaluated by Dudek's technical staff for their potential to reduce the Project's significant environmental impacts and ability to meet the Project's objectives. After evaluation, it was determined that the alternative involving development consistent with the existing General Plan/Zoning designations (essentially 120 residential units and automobile dealerships) would be the environmentally superior alternative, but it would fail to meet many of the Project's objectives and would not avoid the project's sole significant short-term construction noise impact. The reduced density alternative would similarly not avoid the Project's significant short-term construction noise impact, but it would meet all of the Project Objectives and would also reduce the magnitude of many of the Project's already less-than-significant impacts.

Given that this comment raises a question regarding the Draft EIR process, it does not raise new or additional environmental issues concerning the adequacy of the Draft EIR. As such, the Draft EIR's analysis is adequate as presented and no changes to the Draft EIR are necessary.

- I2-3** This comment includes concluding remarks. The City acknowledges the comment and notes it does not raise new or additional environmental issues concerning the adequacy of the Draft EIR. For that reason, the City provides no further response to this comment. Nonetheless, the City thanks the commenter for their participation in the planning process.

3 Changes to the Draft Environmental Impact Report

3.1 Introduction

As provided in Section 15088(c) of the CEQA Guidelines, responses to comments may take the form of a revision to a Draft EIR or may be a separate section in the Final EIR. This section complies with the latter option and provides changes to the Draft EIR in this chapter shown as strikethrough text (i.e., ~~strikethrough~~) signifying deletions and underlined text (i.e., underline) signifying additions. These changes are meant to provide clarification, corrections, or minor revisions made to the Draft EIR initiated by the Lead Agency, City of Carson, reviewing agencies, the public, and/or consultants based on their review. Text changes are presented in the section and page order in which they appear in the Draft EIR. None of the corrections or additions constitutes significant new information or substantial project changes that, in accordance with CEQA Guidelines Section 15088.5, would trigger the need to recirculate portions or all of the Draft EIR.

3.2 Changes to the Draft Environmental Impact Report

Changes to the Draft EIR are provided in this section.

Changes to Front Cover and Globally

Explanation for Change:

Since circulation of the Draft EIR, the City planner assigned to the Project, Gena Guisar, has transitioned into a role as Interim Planning Manager.

Change:

Prepared for:

City of Carson
Community Development Department, Planning Division
701 East Carson Street
Carson, CA 90745

CONTACT:

Gena Guisar
~~Senior Planner~~ Interim Planning Manager

Note: This change is applied globally throughout the Draft EIR.

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4 Mitigation Monitoring and Reporting Program

4.1 Introduction

California Public Resources Code Section 21081.6 requires that, upon certification of an EIR, “the public agency shall adopt a reporting or monitoring program for the changes made to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment. The reporting or monitoring program shall be designed to ensure compliance during project implementation.” (PRC Section 21000–21177)

This Mitigation Monitoring and Reporting Program was developed in compliance with Section 21081.6 of the California Public Resources Code and Section 15097 of the CEQA Guidelines (14 CCR 15000–15387 and Appendices A–L.), and includes the following information:

- A list of mitigation measures as well as the Project Design Features
- The timing for implementation of the mitigation measures and Project Design Features
- The party responsible for implementing or monitoring the mitigation measures and Project Design Features
- The date of completion of monitoring

The City of Carson must adopt this Mitigation Monitoring and Reporting Program, or an equally effective program, if it approves the proposed Project with the mitigation measures that were adopted or made conditions of Project approval.

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4.2 Mitigation Monitoring and Reporting Program Table

Mitigation Measure	Implementation Timing	Agency Responsible for Monitoring	Initials	Date
Project Design Features				
<p>PDF-AQ-1. Engine Standards for Off-Road Equipment. During Project construction, all internal combustion engines/construction equipment operating on the Project site shall meet EPA-certified Tier 4 Interim/Final emissions standards according to the following:</p> <ul style="list-style-type: none"> All off-road diesel-powered construction equipment greater than 50 horsepower shall meet the EPA-certified Tier 4 Interim emission standards, with the exception of grading phase construction equipment greater than 100 horsepower. During the grading phase, all off-road diesel-powered construction equipment greater than 100 horsepower (e.g., excavators, graders, dozers, and scrapers) shall meet the EPA-certified Tier 4 Final (model year 2008 or newer) emission standards. In addition, all construction equipment shall be outfitted with best available control technologies (BACT) devices certified by the California Air Resources Board (CARB). Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 4 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations. A copy of each unit's certified tier specification, BACT documentation, and CARB or South Coast Air Quality Management District (SCAQMD) operating permit (or registration) shall be provided at the time of mobilization of each applicable unit of equipment. 	<p>Use of Tier 4 Construction Equipment During all construction phases</p> <p>Submission of Operating Permit/Registration Submission of documentation to City of Carson Building & Safety Department prior to time of mobilization of each applicable unit of equipment</p> <p>Ongoing Monitoring Submission of construction equipment logs on bimonthly basis to City of Carson Building & Safety Department during all phases of construction activity</p>	City of Carson		
<p>PDF-HAZ-1. Soil Management Plan. The Project Applicant shall prepare a Soil Management Plan that is submitted and approved by the Los Angeles County Health Hazardous Materials Division (HHMD). The Soil Management Plan shall be prepared by a qualified environmental consultant, consistent with the findings of</p>	<p>Approval of Soil Management Plan Prior to issuance of grading permit(s)</p> <p>Implementation of Soil Management Plan During any ground disturbing activities</p>	Los Angeles County Health Hazardous Materials		

Mitigation Measure	Implementation Timing	Agency Responsible for Monitoring	Initials	Date
<p>the June 17, 2019 AEC Phase I and II Environmental Site Assessment, or any updates to that report.</p> <ul style="list-style-type: none"> ▪ During construction, the contractor shall implement the Soil Management Plan. If unidentified or suspected contaminated soil or groundwater evidenced by stained soil, noxious odors, or other factors, is encountered during site preparation or construction activities on any portion of the Project site, the contractor shall stop in the excavation area of potential contamination and notify HHMD. Following oversight from HHMD, the applicant shall retain a qualified professional to collect soil samples to confirm the type and extent of contamination if deemed necessary by HHMD. ▪ If contamination is confirmed to be present, any further ground disturbing activities within areas of identified or suspected contamination shall be conducted according to a site-specific health and safety plan, prepared by a California state licensed professional. The contractor shall follow all procedural direction given by HHMD and in accordance with the Soil Management Plan to ensure that suspect soils are isolated, protected from runoff, and disposed of in accordance with transport laws and the requirements of the licensed receiving facility. ▪ If contaminated soil or groundwater is encountered and identified constituents exceed human health risk levels, ground disturbing activities shall not recommence within the contaminated areas until remediation is complete and a “no further action” letter is obtained from the appropriate regulatory agency or direction is otherwise given that construction can commence. The Project Applicant shall submit the “no further action” letter or equivalent notification to the City prior to resumption of any ground disturbing activity on the relevant portion of the Project site. 		Division/City of Carson		

Mitigation Measure	Implementation Timing	Agency Responsible for Monitoring	Initials	Date
<p>PDF-TRA-1. Transportation Demand Management (TDM) Plan which includes a number of parking and transportation demand management strategies to encourage the use of active transportation modes, such as walking, biking, carpooling, and taking transit.</p> <ul style="list-style-type: none"> ▪ Transportation Demand Management Plan: The Project includes residential and restaurant components. This allows for the internal capture of some Project trips, as described in Chapter 3. For example, residents of the Project can walk to the Project’s restaurant uses, instead of driving. ▪ Senior Housing Shuttle: When the Project’s senior housing component is constructed, a regularly scheduled shuttle service would be provided for senior residents to access shopping and services in the surrounding area. The shuttles will transport groups of senior residents for each trip. Thus, this service can potentially reduce the need for single-occupant vehicle trips to and from the Project site. ▪ Unbundled Parking: The monthly rent expense allocated to parking will be “unbundled” as a separate, optional line item for residents of the Project’s apartment units. Unbundling the expense of parking allows tenants to more consciously weigh the costs and benefits of purchasing additional parking spaces and incentivizes reducing overall vehicle occupancy. ▪ Car Sharing Program: The Project will include designated parking spaces for car sharing vehicles. Car sharing programs allow greater flexibility for residents who do not own a vehicle but may occasionally require a vehicle for some trips, such as: recreational activities, visiting family and friends in suburban/rural locations, etc. ▪ Workstation Areas: The Project’s amenity spaces for residents will include workstation areas to facilitate telecommuting. Each resident telecommuter can potentially reduce daily single-occupant vehicle trips, especially peak hour trips. 	<p>Approval of TDM Plan Prior to issuance of each Certificate of Occupancy</p> <p>Ongoing Implementation of TDM Plan During Operation</p>	<p>City of Carson</p>		

Mitigation Measure	Implementation Timing	Agency Responsible for Monitoring	Initials	Date
<p>PDF-TRA-2. Grace Avenue/213th Street Signalization. The Project Applicant will signalize the currently stop-controlled Grace Avenue/213th Street intersection.</p>	<p>Signalization Prior to issuance of first Certificate of Occupancy</p>	<p>City of Carson</p>		
Geology and Soils				
<p>MM-PALEO-1. Paleontological Resources Impact Mitigation Program and Paleontological Monitoring. The applicant shall retain a qualified paleontologist per the Society of Vertebrate Paleontology (SVP) (2010) guidelines. The paleontologist shall prepare a Paleontological Resources Impact Mitigation Program (PRIMP) for the Proposed Project. The PRIMP shall be consistent with the SVP (2010) guidelines and outline requirements for preconstruction meeting attendance and worker environmental awareness training, where paleontological monitoring is required within the Project site based on construction plans and geotechnical reports, procedures for adequate paleontological monitoring and discoveries treatment, and paleontological methods (including sediment sampling for microinvertebrate and microvertebrate fossils), reporting, and collections management. The qualified paleontologist shall attend the preconstruction meeting and a qualified paleontological monitor shall be on site during all rough grading and other significant ground-disturbing activities (including augering) in previously undisturbed Pleistocene deposits as stated in the PRIMP. In the event that paleontological resources (e.g., fossils) are unearthed during grading, the paleontological monitor will temporarily halt and/or divert grading activity to allow recovery of paleontological resources. The area of discovery will be roped off with a 50-foot radius buffer. Once documentation and collection of the find is completed, the monitor will allow grading to recommence in the area of the find.</p>	<p>Approval PRIMP Prior to issuance of grading permit(s)</p> <p>Worker Environmental Awareness Training Prior to initiation of ground disturbing activity for contractor(s) conducting such activities</p> <p>Paleontological Monitoring During rough grading and other significant ground-disturbing activities in previously undisturbed Pliestocene deposits (to be determined at the professional judgement of the qualified paleontologist)</p>	<p>City of Carson</p>		
Noise				
<p>MM-NOI-1. To reduce noise levels during construction activities, the Project Applicant must demonstrate, to the satisfaction of the City</p>	<p>Submission of Construction Contracts Submission of construction contracts to City of Carson Building & Safety Department prior to</p>	<p>City of Carson</p>		

Mitigation Measure	Implementation Timing	Agency Responsible for Monitoring	Initials	Date
<p>of Carson Community Development Director, that the Project complies with the following:</p> <ul style="list-style-type: none"> ▪ Construction contracts must specify that all construction equipment, fixed or mobile, shall be equipped with properly operating and maintained mufflers and other state-required noise attenuation devices. ▪ A sign, legible at a distance of 50 feet, shall be posted at the Project site providing a contact name and a telephone number where residents can inquire about the construction process and register complaints. This sign shall indicate the dates and duration of construction activities. In conjunction with this required posting, a noise disturbance coordinator shall be identified to address construction noise concerns received. The coordinator shall be responsible for responding to any local complaints about construction noise. When a complaint is received, the disturbance coordinator shall notify the City within 24 hours of the complaint and determine the cause of the noise complaint (starting too early, malfunctioning muffler, etc.) and shall implement reasonable measures to resolve the complaint, as deemed acceptable by the City. All signs posted at the construction site shall include the contact name and the telephone number for the noise disturbance coordinator. ▪ During construction, stationary construction equipment shall be placed such that emitted noise is directed away from sensitive noise receivers. ▪ Per Section 5502 (c) of the Municipal Code, construction shall be limited to the hours between 7:00 a.m. and 8:00 p.m. daily (except Sundays and legal holidays). All construction activities shall be prohibited at night (between 8:00 p.m. and 7:00 a.m.) and on Sundays and legal holidays. 	<p>issuance of demolition, grading, and building permits</p> <p>Ongoing Implementation During all construction phases</p> <p>Verification of Construction Hours Submission of construction equipment and hour logs on bimonthly basis to City of Carson Building & Safety Department during all phases of construction activity</p>			
<p>MM-NOI-2. In order to reduce construction noise, a temporary noise barrier or enclosure shall be used along the southern and</p>	<p>Installation of Temporary Noise Barrier</p>	<p>City of Carson</p>		

Mitigation Measure	Implementation Timing	Agency Responsible for Monitoring	Initials	Date
<p>southwestern portion property lines to break the line of sight between the construction equipment and the adjacent residences; Assessor's Parcel Number (APN) 7337-002-047, 7337-002-004, 7337-002-008, 7337-002-010, 7337-002-012, 7337-002-040. The temporary noise barrier shall have a sound transmission class (STC) of at least 10 or greater in accordance with American Society for Testing and Materials Test Method E90, or at least 2 pounds per square foot to ensure adequate transmission loss characteristics. In order to achieve this, the barrier may consist of 3-inch steel tubular framing, welded joints, a layer of 18-ounce tarp, a 2-inch-thick fiberglass blanket, a 0.5-inch-thick weatherwood asphalt sheathing, and 7/16-inch sturdy board siding with a heavy duct seal around the perimeter. The length, height, and location of noise control barrier walls shall be adequate to assure proper acoustical performance. In addition, to avoid objectionable noise reflections, the source side of the noise barrier shall be lined with an acoustic absorption material meeting a noise reduction coefficient rating of 0.70 or greater in accordance with American Society for Testing and Materials Test Method C423. All noise control barrier walls shall be designed to preclude structural failure due to such factors as winds, shear, shallow soil failure, earthquakes, and erosion.</p>	<p>Prior to issuance of demolition permit</p> <p>Use of Temporary Noise Barrier During all phases of Project construction until construction is completed along the southern and southwestern portion property lines to break the line of sight between the construction equipment and the adjacent residences; Assessor's Parcel Number (APN) 7337-002-047, 7337-002-004, 7337-002-008, 7337-002-010, 7337-002-012, 7337-002-040</p>			
<p>MM-NOI-3. To reduce construction truck trip noise impacts on sensitive receptors during construction activities, the Project Applicant must demonstrate, to the satisfaction of the City of Carson Community Development Director, that the Project complies with the following:</p> <ul style="list-style-type: none"> ▪ The construction contractor shall limit haul truck deliveries to the same hours specified for construction equipment (between the hours of 7:00 a.m. to 8:00 p.m. on weekdays and Saturdays with no activity allowed on Sundays or holidays). A haul route exhibit shall be submitted to the City of Carson Community Development Director that designates delivery routes to minimize the exposure of sensitive land uses or 	<p>Approval of Haul Route Exhibit Prior to issuance of demolition permit</p> <p>Verification of Construction Hours Submission of construction equipment and hour logs on bimonthly basis to City of Carson Building & Safety Department during all phases of construction activity</p> <p>Ongoing Implementation During all phases of construction activity</p>	City of Carson		

Mitigation Measure	Implementation Timing	Agency Responsible for Monitoring	Initials	Date
residential dwellings to delivery truck-related noise. Specifically, the haul route exhibit shall depict site access for construction haul truck trips along Avalon Boulevard.				
<p>MM-NOI-4. The following measures shall be incorporated on all grading and building plans and specifications subject to approval of the City’s Building and Safety Division prior to issuance of a demolition or grading permit (whichever occurs first):</p> <ul style="list-style-type: none"> ▪ The Project Applicant shall ensure construction equipment will not approach the construction buffer zone adjacent to the residential structures along the Project’s southern and southwestern boundary. The buffer zone shall be tiered based on distances established in Table 4.10-12, Representative Vibration Source Levels for Construction Equipment. As shown in Table 4.10-12, vibratory drivers shall not operate within 60 feet of residential structures; vibratory rollers shall not operate within 26 feet of residential structures; and large bulldozers, caisson drilling activities, and loaded trucks shall not operate within 15 feet of residential structures. The buffer zone shall be in enforced around the existing residential structures between the hours of 7:00 a.m. and 8:00 p.m. pursuant to Municipal Code Section 5502 (c). ▪ The Project Applicant shall utilize a construction vibration monitoring system with the potential to measure low levels of vibration (i.e. 0.2 inch-per-second PPV and 0.3 inch-per-second PPV) to ensure human annoyance and structural damage does not occur. If the human annoyance criterion (0.2 inch-per-second PPV) and the structural damage criterion (0.3 inch-per-second PPV) are exceeded, construction must cease and alternate strategies shall be employed to ensure the human annoyance and structural damage vibration criteria are not exceeded. ▪ The Project Applicant shall conduct sensitivity training to inform construction personnel about the existing sensitive 	<p>Verification of Measures on Plans Prior to issuance of a demolition or grading permit (whichever occurs first)</p> <p>Limitations on Movement of Construction Equipment During all phases of construction activity</p> <p>Construction Vibration Monitoring During grading, building construction, and paving</p> <p>Sensitivity Training Prior to initiation of grading activities and prior to commencement of subsequent construction phases if new contractors conduct subsequent work</p>	City of Carson		

Mitigation Measure	Implementation Timing	Agency Responsible for Monitoring	Initials	Date
<p>receptors surrounding the Project and about methods to reduce noise and vibration.</p>				
Tribal Cultural Resources				
<p>MM-TCR-1. Retain a Native American Monitor/Consultant. The Project Applicant shall be required to retain and compensate for the services of a Tribal monitor/consultant who is both ancestrally affiliated with the Project area and approved by the Gabrieleño Band of Mission Indians-Kizh Nation Tribal Government and is listed under the Native American Heritage Commission’s (NAHC) Tribal Contact list for the area of the project location. This list is provided by the NAHC. A Native American monitor shall be retained by the Lead Agency or owner of the project to be on site to monitor all project-related, ground-disturbing construction activities (i.e., boring, grading, excavation, potholing, trenching, etc.). A monitor associated with one of the NAHC recognized Tribal governments which have commented on the project shall provide the Native American monitor. The monitor/consultant will only be on-site during the construction phases that involve ground disturbing activities. Ground disturbing activities are defined by the Gabrieleño Band of Mission Indians-Kizh Nation as activities that may include, but are not limited to, pavement removal, pot-holing or auguring, grubbing, tree removals, boring, grading, excavation, drilling, and trenching, within the project area. The Tribal Monitor/consultant will complete daily monitoring logs that will provide descriptions of the day’s activities, including construction ground disturbing activities, locations, soil, and any cultural materials identified, if any. The on-site monitoring shall end when the Project site grading and excavation activities are completed, or when the Tribal Representatives and monitor/consultant have indicated that the site has a low potential for impacting Tribal Cultural Resources.</p> <ul style="list-style-type: none"> ▪ Unanticipated Discovery of Tribal Cultural and Archaeological Resources. Upon discovery of any tribal cultural or 	<p>Retention of Tribal Monitor/Consultant Prior to issuance of grading permit(s)</p> <p>Monitoring During ground-disturbing construction activities (i.e., boring, grading, excavation, potholing, trenching, etc.).</p> <p>Submission of Daily Monitoring Logs Submission of daily monitoring logs on bimonthly basis to City of Carson Building & Safety Department during ground-disturbing construction activities</p>	<p>City of Carson</p>		

Mitigation Measure	Implementation Timing	Agency Responsible for Monitoring	Initials	Date
<p>archaeological resources, cease construction activities in the immediate vicinity of the find until the find can be assessed. All tribal cultural and archaeological resources unearthed by project construction activities shall be evaluated by the qualified archaeologist and tribal monitor/consultant. If the resources are Native American in origin, the Gabrieleño Band of Mission Indians-Kizh Nation shall coordinate with the landowner regarding treatment and curation of these resources. Typically, the Tribe will request preservation in place or recovery for educational purposes. Work may continue on other parts of the project while evaluation and, if necessary, additional protective mitigation takes place (CEQA Guidelines Section 15064.5[f]). If a resource is determined by the qualified archaeologist to constitute a “historical resource” or “unique archaeological resource, time allotment and funding sufficient to allow for implementation of avoidance measures, or appropriate mitigation, must be available. The treatment plan established for the resources shall be in accordance with CEQA Guidelines Section 15064.5(f) for historical resources.</p> <ul style="list-style-type: none"> ▪ Public Resources Code Section 21083.2(b) for unique archaeological resources. Preservation in place (i.e., avoidance) is the preferred manner of treatment. If preservation in place is not feasible, treatment may include implementation of archaeological data recovery excavations to remove the resource along with subsequent laboratory processing and analysis. All Tribal Cultural Resources shall be returned to the Tribe. Any historical archaeological material that is not Native American in origin shall be curated at a public, non-profit institution with a research interest in the materials, if such an institution agrees to accept the material. If no institution accepts the archaeological material, they shall be offered to the Tribe of a local school or historical society in the area for educational purposes. 				

Mitigation Measure	Implementation Timing	Agency Responsible for Monitoring	Initials	Date
<ul style="list-style-type: none"> ▪ Unanticipated Discovery of Human Remains and Associated Funerary Objects. Native American human remains are defined in PRC Section 5097.98 (d)(1) as an inhumation or cremation, and in any state of decomposition or skeletal completeness. Funerary objects, called associated grave goods in PRC Section 5097.98, are also to be treated according to this statute. Health and Safety Code 7050.5 dictates that any discoveries of human skeletal material shall be immediately reported to the County Coroner and excavation halted until the coroner has determined the nature of the remains. If the coroner recognizes the human remains to be those of a Native American or has reason to believe that they are those of a Native American, they shall contact, by telephone within 24 hours, the NAHC and PRC Section 5097.98 shall be followed. ▪ Resource Assessment and Continuation of Work Protocol. Upon discovery of human remains, the tribal and/or archaeological monitor/consultant will immediately divert work at minimum of 150 feet and place an exclusion zone around the discovery location. The monitor/consultant(s) will then notify the Tribe, the qualified lead archaeologist, and the construction manager who will call the coroner. Work will continue to be diverted while the coroner determines whether the remains are human and subsequently Native American. The discovery is to be kept confidential and secure to prevent any further disturbance. If the finds are determined to be Native American, the coroner will notify the NAHC as mandated by state law who will then appoint a Most Likely Descendent (MLD). ▪ Kizh-Gabrieleno Procedures for Burials and Funerary Remains. If the Gabrieleno Band of Mission Indians-Kizh Nation is designated MLD, the Koo-nas-gna Burial Policy shall be implemented. To the Tribe, the term “human remains” encompasses more than human bones. In ancient as well as historic times, Tribal Traditions included, but were not limited to, the preparation of the soil for burial, the burial of funerary 				

Mitigation Measure	Implementation Timing	Agency Responsible for Monitoring	Initials	Date
<p>objects with the deceased, and the ceremonial burning of human remains. The prepared soil and cremation soils are to be treated in the same manner as bone fragments that remain intact. Associated funerary objects are objects that, as part of the death rite or ceremony of a culture, are reasonably believed to have been placed with individual human remains either at the time of death or later; other items made exclusively for burial purposes or to contain human remains can also be considered as associated funerary objects.</p> <ul style="list-style-type: none"> Treatment Measures. Prior to the continuation of ground disturbing activities, the landowner shall arrange a designated site location within the footprint of the Project for the respectful reburial of the human remains and/or ceremonial objects. In the case where discovered human remains cannot be fully documented and recovered on the same day, the remains will be covered with muslin cloth and a steel plate that can be moved by heavy equipment placed over the excavation opening to protect the remains. If this type of steel plate is not available, a 24-hour guard shall be posted outside of working hours. The Tribe will make every effort to recommend diverting the project and keeping the remains in situ and protected. If the Project cannot be diverted, it may be determined that burials will be removed. The Tribe will work closely with the qualified archaeologist to ensure that the excavation is treated carefully, ethically, and respectfully. If data recovery is approved by the Tribe, documentation shall be taken which includes at a minimum detailed descriptive notes and sketches. Additional types of documentation shall be approved by the Tribe for data recovery purposes. Cremations will either be removed in bulk or by means as necessary to ensure complete recovery of all material. If the discovered of human remains includes four or more burials, the location is considered a cemetery and a separate treatment plan shall be created. Once complete, a final report of all activities is to be submitted to the Tribe and the 				

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<p>NAHC. The Tribe does not authorize any scientific study or the utilization of any invasive and/or destructive diagnostics on human remains.</p> <ul style="list-style-type: none"> ▪ Each occurrence of human remains and associated funerary objects will be stored using opaque cloth bags. All human remains, funerary objects, sacred objects, and objects of cultural patrimony will be removed to a secure container on site if possible. These items should be retained and reburied within six months of recovery. The site of reburial/repatriation shall be on the Project site but at a location agreed upon between the Tribe and the landowner at the site to be protected in perpetuity. There shall be no publicity regarding any cultural materials recovered. ▪ Professional Standards. Archaeological and Native American monitoring and excavation during construction projects will be consistent with current professional standards. All feasible care to avoid any unnecessary disturbance, physical modification, or separation of human remains and associated funerary objects shall be taken. Principal personnel must meet the Secretary of Interior standards for archaeology and have a minimum of 10 years of experience as a principal investigator working with Native American archaeological sites in southern California. The Qualified Archaeologist shall ensure that all other personnel are appropriately trained and qualified. 				

5 References

5.1 References Cited

SCAMD (South Coast Air Quality Management District). 2019. Wilmington, Carson, West Long Beach Community Emissions Reduction Plan. September 2019. <https://www.aqmd.gov/docs/default-source/ab-617-ab-134/steering-committees/wilmington/cerp/final-cerp-wcwlb.pdf?sfvrsn=8>

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