

# MEMORANDUM

---

**To:** City of Carson Planning Commission and City Council  
**From:** Jason Reynolds, Project Manager, Dudek  
**Subject:** Response to Late Draft EIR Comment Letter for the Imperial Avalon Mixed-Use Project  
**Date:** November 17, 2022  
**cc:** Saied Naaseh, Community Development Director, City of Carson  
Gena Guisar, Interim Planning Manager, City of Carson

---

## Introduction

This memorandum provides responses to a comment letter received by the Los Angeles County Fire Department on the Draft Environmental Impact Report (EIR) for the Imperial Avalon Mixed-Use Project (Project). The comment letter was received on November 3, 2022, after the close of the Draft EIR comment period and completion of the Final EIR. Nonetheless, the City is still providing these responses for the Project's file and consideration by the City's decisionmakers.

The comment letter is provided on the following page and has been identified as Comment Letter A-1. The comment letter was 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., A-1, A-2, A-3, etc.). To aid readers and commenters, electronically bracketed comments have been reproduced in this document, with the corresponding responses provided immediately following the comments.

## Executive Summary

Comments generally include advisory information for use by the City during the planning and development process. One comment from the Health Hazardous Materials Division expresses a concern regarding the contaminants of concern in the Project site's subsurface. This concern is addressed in Response to Comment A-6; the City finds that the concern was adequately addressed within the Draft EIR by way of extensive subsurface investigations and project design features. The comment does not warrant changes to the Draft or Final EIR. Nonetheless, the City will coordinate with the Health Hazardous Materials Division regarding this concern throughout the planning and development process.

# Comment Letter A



**COUNTY OF LOS ANGELES  
FIRE DEPARTMENT**

1320 NORTH EASTERN AVENUE  
LOS ANGELES, CALIFORNIA 90063-3294  
(323) 881-2401  
www.fire.lacounty.gov

*"Proud Protectors of Life, Property, and the Environment"*

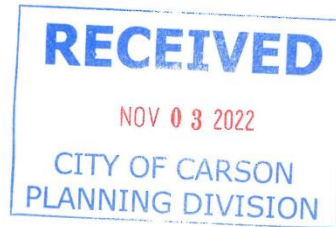
ANTHONY C. MARRONE  
INTERIM FIRE CHIEF  
FORESTER & FIRE WARDEN

**Comment Letter A**

BOARD OF SUPERVISORS

- HILDA L. SOLIS  
FIRST DISTRICT
- HOLLY J. MITCHELL  
SECOND DISTRICT
- SHEILA KUEHL  
THIRD DISTRICT
- JANICE HAHN  
FOURTH DISTRICT
- KATHRYN BARGER  
FIFTH DISTRICT

October 28, 2022



Gena Guisar, Planner  
701 E. Carson Street  
Carson, CA 90745

Dear Ms. Guisar:

**ENVIRONMENTAL IMPACT REPORT, PROPOSES THE DEVELOPMENT OF 1,527,694 SQUARE FEET OF RESIDENTIAL SPACE, 10,352 SQUARE FEET OF COMMERCIAL USES, AND 647,027 SQUARE FEET OF PARKINGSACE ON 27 ACRES AT 21207 SOUTH AVALON BOULEVARD, CITY OF CARSON, FFER2022010707**

The Environmental Impact Report was reviewed by the Planning Division, Land Development Unit, Forestry Division, and Health Hazardous Materials Division of the County of Los Angeles Fire Department.

A-1

The following are their comments:

**PLANNING DIVISION:**

We have no comments.

A-2

For any questions regarding this response, please contact Ed Lamas, Planning Analyst, at (323) 881-2404 or [Eduardo.Lamas@fire.lacounty.gov](mailto:Eduardo.Lamas@fire.lacounty.gov)

**LAND DEVELOPMENT UNIT:**

The proposed development within the boundaries of the Environmental Impact Report submitted to the County of Los Angeles Fire Department, shall comply with all applicable code and ordinance requirements for construction, access, water main, fire flows and fire hydrants

A-3

SERVING THE UNINCORPORATED AREAS OF LOS ANGELES COUNTY AND THE CITIES OF:

- |              |             |                  |                      |                      |                       |                  |
|--------------|-------------|------------------|----------------------|----------------------|-----------------------|------------------|
| AGOURA HILLS | CARSON      | EL MONTE         | INGLEWOOD            | LAWNDALE             | PICO RIVERA           | SIGNAL HILL      |
| ARTESIA      | CERRITOS    | GARDENA          | IRWINDALE            | LOMITA               | POMONA                | SOUTH EL MONTE   |
| AZUSA        | CLAREMONT   | GLENORA          | LA CANADA-FLINTRIDGE | LYNWOOD              | RANCHO PALOS VERDES   | SOUTH GATE       |
| BALDWIN PARK | COMMERCE    | HAWAIIAN GARDENS | LA HABRA             | MALIBU               | ROLLING HILLS         | TEMPLE CITY      |
| BELL         | COVINA      | HAWTHORNE        | LA MIRADA            | MAYWOOD              | ROLLING HILLS ESTATES | VERNON           |
| BELL GARDENS | CUDAHY      | HERMOSA BEACH    | LA PUENTE            | NORWALK              | ROSEMEAD              | WALNUT           |
| BELLFLOWER   | DIAMOND BAR | HIDDEN HILLS     | LAKEWOOD             | PALMDALE             | SAN DIMAS             | WEST HOLLYWOOD   |
| BRADBURY     | DUARTE      | HUNTINGTON PARK  | LANCASTER            | PALOS VERDES ESTATES | SANTA CLARITA         | WESTLAKE VILLAGE |
| CALABASAS    |             | INDUSTRY         |                      | PARAMOUNT            |                       | WHITTIER         |

Gena Guisar, Planner  
October 28, 2022  
Page 2

The proposed development has been submitted for review and approval to the County of Los Angeles Fire Department Fire Prevention Division Land Development Unit under the following [epicla.lacounty.gov](http://epicla.lacounty.gov) submittal numbers and are currently under review by the County of Los Angeles Fire Department Fire Prevention Division Land Development Unit.

Plan Number: FLDU2019006440 (Tentative Tract Map No. 82645)  
Plan Number: FLDU2019006447 (No TTM, already a contiguous property)  
Plan Number: FLDU2019006448 (Tentative Tract Map No. 82676)

For any questions regarding the report, please contact Nancy Rodeheffer at (323) 890-4244, or at [nancy.rodeheffer@fire.lacounty.gov](mailto:nancy.rodeheffer@fire.lacounty.gov)

**FORESTRY DIVISION – OTHER ENVIRONMENTAL CONCERNS:**

The statutory responsibilities of the County of Los Angeles Fire Department, Forestry Division include erosion control, watershed management, rare and endangered species, brush clearance, vegetation management, fuel modification for Fire Hazard Severity Zones, archeological and cultural resources, and the County Oak Tree Ordinance.

For any questions regarding this response, please contact Forestry Assistant, Nicholas Alegria at (818) 890-5719.

**HEALTH HAZARDOUS MATERIALS DIVISION:**

The Health Hazardous Materials Division (HHMD) of the Los Angeles County Fire Department reviewed the known environmental impacts to the Project site soil and recommends that further vertical and lateral delineation of the impacts be pursued with environmental oversight conducted by a qualified local or state agency. This issue should be discussed with HHMD in the very near future.

Please contact HHMD Hazardous Materials Specialist III, Jennifer Levenson at (323) 890-4114 or [Jennifer.Levenson@fire.lacounty.gov](mailto:Jennifer.Levenson@fire.lacounty.gov) if you have any questions.

Very truly yours,



RONALD M. DURBIN, CHIEF, FORESTRY DIVISION  
PREVENTION SERVICES BUREAU

RMD:pg

A-4

A-5

A-6

## Response to Comment Letter A

Ronald M. Durbin, Acting Chief,  
Forestry Division, Prevention Services Bureau  
County of Los Angeles Fire Department  
October 28, 2022

**A-1** This comment is an introduction by the County of Los Angeles Fire Department indicating that the Planning Division, Land Development Unit, Forestry Division, and Health Hazardous Materials Division have reviewed the Draft Environmental Impact Report (EIR).

The City acknowledges the comment as an introduction to comments that follow. This comment is included in the City's staff report 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.

**A-2** This comment states that the Planning Division does not have any comments. No further response is necessary.

**A-3** This comment states that the proposed development shall comply with all applicable code and ordinance requirements for construction, access, water main, fire flows, and hydrants. This comment is noted and the City acknowledges that it will require the developer to comply with these requirements. The comment also provides plan numbers associated with the development and notes the plans are under review. The City acknowledges this comment and will continue to coordinate with the Land Development unit throughout the planning process.

**A-4** This comment provides plan numbers associated with the development and notes the plans are under review. The City acknowledges this comment and will continue to coordinate with the Land Development Unit throughout the planning process.

**A-5** This comment lists the statutory responsibilities of the Forestry Division and provides contact information should the City have any questions regarding their response. The City acknowledges this comment and will coordinate with the Forestry Division throughout the planning process, as applicable.

**A-6** This comment states that the Health Hazardous Materials Division has reviewed the Draft EIR and recommends that further vertical and lateral delineation of the potential soil impacts be pursued with environmental oversight conducted by a qualified local or state agency. The comment states that the issue should be discussed with the Health Hazardous Materials Division in the very near future.

The Draft EIR discussed the subsurface characteristics of the Project site with regard to contaminants of concern. 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. These conditions are further detailed in the Phase I and Phase II Environmental Site Assessment and Supplemental Phase I and Phase II Letter Report (Appendices G-1 and G-2 of the Draft EIR, respectively). These reports, prepared by qualified and expert professional geologists trained in environmental health and hazards, included an extensive investigation of the site's subsurface and included soil and soil gas sampling. As discussed within these reports, while contaminants of concerns are currently present on site, the measures that would be undertaken as part of the Project would not result in adverse effects to both contractors constructing the Project or future occupants of the site.

First, 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. Second, the Project includes a Project Design Feature (PDF-HAZ-1), which calls for the preparation of a Soil Management Plan. The Soil Management plan will be prepared by a qualified environmental consultant and will be submitted and approved by the Health Hazardous Materials Division. Per the Soil Management Plan, contractors will be trained to scan for suspected contaminated soil or groundwater evidenced by stained soil, noxious odors, or other factors. If suspected contaminated soil or groundwater is encountered during site preparation or construction activities on any portion of the Project site, the contractor will stop in the excavation area of potential contamination and notify HHMD. Following oversight from HHMD, a qualified professional will be retained 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 will be conducted according to a site-specific health and safety plan, prepared by a California state licensed professional. The contractor will 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 will stop 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 "no further action" letter or equivalent notification will be submitted to the City prior to resumption of any ground disturbing activity on the relevant portion of the Project site..

In addition, as part of the Project a vapor mitigation system will be installed beneath the building slabs of future residential structures in compliance with Section 110.3 of the Los Angeles County Building Code. Therefore, as discussed in the Draft EIR, with adherence to existing regulatory requirements including Section 110.3 of the Building Code and implementation of a Soils Management Plan under PDF-HAZ-1, the potential impact from any potential contaminated soil or groundwater would be considered less than significant. The analysis within the Draft and Final EIR, as well as the Project design features to address these concerns, are adequate.

Nonetheless, the City will assuredly coordinate with the Health Hazardous Materials Division, both in the very near future, during preparation of the Soil Management Plan, and throughout the development process.