

VICTORIA GREENS

Final Initial Study/Mitigated Negative Declaration

PREPARED FOR:

CITY OF CARSON

701 East Carson Street

Carson, California 90745

Contact: Leila Carver, PTP, Planner

PREPARED BY:

DUDEK

27372 Calle Arroyo

San Juan Capistrano, California 92675

Contact: Collin Ramsey, Senior Project Manager

JUNE 2019

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ACRONYMS AND ABBREVIATIONS

Acronym/Abbreviation	Definition
CEQA	California Environmental Quality Act
City	City of Carson
HRA	Health Risk Assessment
IS	Initial study
MERV	Minimum Efficiency Reporting Value
MND	Mitigated negative declaration
SCAQMD	South Coast Air Quality Management District
TAC	toxic air contaminant

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1 INTRODUCTION

An Initial Study (IS)/Mitigated Negative Declaration (MND) was prepared for the proposed Victoria Greens project (project) and made available for public comment for a 30-day public review period from January 17, 2019 through February 15, 2019. In accordance with the California Environmental Quality Act (CEQA) Guidelines, Section 15074(b) (14 CCR 15074(b)), before approving the project, the City of Carson (City), as the lead agency under CEQA, will consider the MND with any comments received during this public review period. Specifically, Section 15074(b) of the CEQA Guidelines (14 CCR 15074(b)) states the following:

Prior to approving a project, the decision-making body of the lead agency shall consider the proposed negative declaration or mitigated negative declaration together with any comments received during the public review process. The decision-making body shall adopt the proposed negative declaration or mitigated negative declaration only if it finds on the basis of the whole record before it (including the initial study and any comments received), that there is no substantial evidence that the project will have a significant effect on the environment and that the negative declaration or mitigated negative declaration reflects the lead agency’s independent judgment and analysis.

The agencies and individuals that provided substantive written comments on the environmental issues addressed within the IS/MND during the public review period are listed in Table 1. Although CEQA (California Public Resources Code, Section 21000 et seq.) and the CEQA Guidelines (14 CCR 15000 et seq.) do not explicitly require a lead agency to provide written responses to comments received on a proposed IS/MND, the lead agency may do so voluntarily. Individual comments within each communication are numbered so comments can be cross-referenced with responses. Comment letters received during the public review period are included in Appendix A.

Table 1
Comment Letter Summary

Letter Number	Commenter	Date
1	Adriana Raza, Customer Service Specialist, Facilities Planning Department, Los Angeles County Sanitation Districts	February 8, 2019
2	Pete Cooke, Site Mitigation and Restoration Program – Chatsworth Office, Hazardous Waste Management Program, Permitting Division, Department of Toxic Substances Control	February 8, 2019
3	Miya Edmonson, IGR/CEQA Branch Chief, District 7 – Office of Regional Planning, California Department of Transportation	February 13, 2019
4	Lijin Sun, JD, Program Supervisor, CEQA IGR, Planning, Rule Development, and Area Sources, South Coast Air Quality Management District	February 14, 2019
5	Michael Y. Takeshita, Acting Chief, Forestry Division Prevention Services Bureau, Los Angeles County Sanitation Fire Department	February 14, 2019

Responses to comments are made in the following text to further supplement, clarify, or expand upon information already presented in the IS/MND. These responses do not change the significance determinations made or the severity of potential environmental impacts evaluated

VICTORIA GREENS
FINAL INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

in the IS/MND. Section 15073.5(c)(4) of the CEQA Guidelines (14 CCR 15073.5(c)(4)) permits the inclusion of new information within an MND if the additional information “merely clarifies, amplifies, or makes insignificant modifications to the negative declaration.”

2 RESPONSES TO COMMENTS

Comment Letter #1



1955 Workman Mill Road, Whittier, CA 90601-1400
Mailing Address: P.O. Box 4998, Whittier, CA 90607-4998
Telephone: (562) 699-7411 (Fax: (562) 699-4129)
www.lacsd.org

COUNTY SANITATION DISTRICTS
OF LOS ANGELES COUNTY

GRACE ROBINSON HYDE
Chief Engineer and General Manager

RECEIVED

FEB 11 2019

CITY OF CARSON
PLANNING DIVISION

February 8, 2019

Ref. Doc. No.: 4896877

Ms. Leila Carver, PTP, Planner
Community Development Department
Planning Division
City of Carson
701 East Carson Street
Carson, CA 90745

Dear Ms. Carver:

NOI Response to the Victoria Greens Project

The Sanitation Districts of Los Angeles County (Districts) received a Notice of Intent to Adopt a Mitigated Negative Declaration (NOI) for the subject project on January 18, 2019. The proposed project is located within the jurisdictional boundaries 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' Del Amo Trunk Sewer, located in Del Amo Boulevard at Central Avenue. The Districts' 18-inch diameter trunk sewer has a capacity of 2.6 million gallons per day (mgd) and conveyed a peak flow of 1.9 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 produces an average flow of 254.7 mgd.
3. The expected average wastewater flow from the project, described in the document as a 175-unit multi-family residential community, is 34,125 gallons per day. For a copy of the Districts' average wastewater generation factors, go to www.lacsd.org, Wastewater & Sewer Systems, click on Will Serve Program, and 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 for the privilege of connecting (directly or indirectly) to the Districts' Sewerage System for increasing the strength or quantity of wastewater discharged from connected facilities. This connection fee is a capital facilities fee that is imposed in an amount sufficient to construct an incremental expansion of the Sewerage System to accommodate the proposed project. Payment of a connection fee will be required before a permit to connect to the sewer is issued. For more information and a copy of the Connection Fee Information Sheet, go to www.lacsd.org, Wastewater & Sewer Systems, click on Will Serve Program, and search for the appropriate link.

1-1

DOC 4917782.D08

VICTORIA GREENS
FINAL INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

Ms. Leila Carver

-2-

February 8, 2019

In determining the impact to the Sewerage System and applicable connection fees, the Districts' Chief Engineer and General Manager will determine the user category (e.g. Condominium, Single Family home, etc.) that best represents the actual or anticipated use of the parcel or facilities on the parcel. For more specific information regarding the connection fee application procedure and fees, please contact the Connection Fee Counter at (562) 908-4288, extension 2727.

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 you that the Districts intend to provide this service up to the levels that are legally permitted and to inform you of the currently existing capacity and any proposed expansion of the Districts' facilities.

1-1
(cont.)

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

Very truly yours,



Adriana Raza
Customer Service Specialist
Facilities Planning Department

AR:ar

cc: A. Schmidt
A. Howard

DOC 4917782.D08

Comment Letter 1 Adriana Raza, Customer Service Specialist, Facilities Planning
Department, Los Angeles County Sanitation Districts

Comment 1-1

Comment

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' Del Amo Trunk Sewer, located in Del Amo Boulevard at Central Avenue. The Districts' 18-inch diameter trunk sewer has a capacity of 2.6 million gallons per day (mgd) and conveyed a peak flow of 1.9 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 produces an average flow of 254.7 mgd.
3. The expected average wastewater flow from the project, described in the document as a 175-unit multi-family residential community, is 34,125 gallons per day. For a copy of the Districts' average wastewater generation factors, go to www.lacsd.org, Wastewater & Sewer Systems, click on Will Serve Program, and 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 for the privilege of connecting (directly or indirectly) to the Districts' Sewerage System for increasing the strength or quantity of wastewater discharged from connected facilities. This connection fee is a capital facilities fee that is imposed in an amount sufficient to construct an incremental expansion of the Sewerage System to accommodate the proposed project. Payment of a connection fee will be required before a permit to connect to the sewer is issued. For more information and a copy of the Connection fee Information Sheet, go to www.lacsd.org, Wastewater & Sewer Systems, click on Will Serve Program, and search for the appropriate link. In determining the impact to the Sewerage System and applicable connection fees, the Districts' Chief Engineer and General Manager will determine the user category (e.g., Condominium, Single Family home, etc.) that best represents the actual or anticipated use of the parcel or facilities on the parcel. For more specific information regarding the connection fee application procedure and fees, please contact the Connection fee Counter at (562) 908-4288, extension 2727.
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 you that the Districts intend to provide this service up to the levels that are legally permitted and to inform you of the currently existing capacity and any proposed expansion of the Districts' facilities.

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

Response

A sewer system capacity study was completed to determine the best option for routing the anticipated wastewater flows produced by the project and its impact on the existing sewer system (see Attachment C of this Final IS/MND for a copy of the Sewer System Hydraulic Analysis report). This study concludes that there would be no adverse effects to the existing sewer system capacity and the existing sewer downstream of the project has adequate capacity to accommodate the proposed development's wastewater peak flow. This is the same less-than-significant impact conclusion made in the IS/MND.

Comment Letter #2



Jared Blumenfeld
Secretary for
Environmental Protection



Department of Toxic Substances Control

Meredith Williams, Ph.D.
Acting Director
9211 Oakdale Avenue
Chatsworth, California 91311



Gavin Newsom
Governor

February 8, 2019

Leila Carver, PTP, Planner
City of Carson
Community Development Department, Planning Division
701 East Carson Street
Carson, California 90745

**NOTICE OF INTENT TO ADOPT A MITIGATED NEGATIVE DECLARATION FOR THE
VICTORIA GREENS PROJECT (PROJECT)**

Dear Ms. Carver:

The Department of Toxic Substances Control (DTSC) has received the document for the above-mentioned project.

Based on the review of the document, the DTSC comments are as follows:

- 1) The document needs to identify and determine whether current or historic uses at the project site have resulted in any release of hazardous wastes/substances at the project area.
- 2) The document needs to identify any known or potentially contaminated site within the proposed project area. For all identified sites, the document needs to evaluate whether conditions at the site pose a threat to human health or the environment.
- 3) The document should identify the mechanism to initiate any required investigation and/or remediation for any site that may require remediation, and which government agency will provide appropriate regulatory oversight.
- 4) If during construction of the project, soil contamination is suspected, construction in the area should stop and appropriate health and safety procedures should be implemented. If it is determined that contaminated soil exists, the document should identify how any required investigation or remediation will be conducted, and which government agency will provide appropriate regulatory oversight.

2-1

Leila Carver
February 8, 2019
Page 2

DTSC provides guidance for Preliminary Endangerment Assessment (PEA) preparation, and cleanup oversight through the Voluntary Cleanup Program (VCP). For additional information on the VCP, please visit DTSC's web site at www.dtsc.ca.gov. If you would like to meet and discuss this matter further, please contact me at (818) 717-6555 or Pete.Cooke@dtsc.ca.gov.

Sincerely,



Pete Cooke
Site Mitigation and Restoration Program - Chatsworth Office

cc: Governor's Office of Planning and Research
State Clearinghouse
P.O. Box 3044
Sacramento, California 95812-3044

Dave Kereazis
Hazardous Waste Management Program, Permitting Division
CEQA Tracking
Department of Toxic Substances Control
P.O. Box 806
Sacramento, California 95812-0806

Comment Letter 2 Pete Cooke, Site Mitigation and Restoration Program –
Chatsworth Office, Hazardous Waste Management
Program, Permitting Division, Department of Toxic
Substances Control

Comment 2-1

Comment

- 1) The document needs to identify and determine whether current or historic uses at the project site have resulted in any release of hazardous wastes/substances at the project area.
- 2) The document needs to identify any known or potentially contaminated site within the proposed project area. For all identified sites, the document needs to evaluate whether conditions at the site pose a threat to human health or the environment.
- 3) The document should identify the mechanism to initiate any required investigation and/or remediation for any site that may require remediation, and which government agency will provide appropriate regulatory oversight.
- 4) If during construction of the project, soil contamination is suspected, construction in the area should stop and appropriate health and safety procedures should be implemented. If it is determined that contaminated soils exist, the document should identify how any required investigation or remediation will be conducted, and which government agency will provide adequate regulatory oversight.

Response

The Remedial Action Plan (RAP) prepared for the project and appended to the Draft IS/MND evaluated previous investigations conducted for the project site and historical uses to determine the potential impacts of contaminants present at the project site. The RAP also identified known and potentially contaminated sites related to the historical uses on the project site. In addition to the RAP, a Human Health Risk Assessment, also included with the Draft IS/MND, evaluated whether conditions at the site pose a threat to human health and the environment.

As discussed in Section 3.8, Hazards and Hazardous Materials, of the Draft IS/MND, the project site is formerly an oil field, and shallow soils currently contain TPH, metals, and VOCs that may pose a risk to on-site construction workers conducting site remediation activities. For construction workers, inhalation of VOCs migrating from soil gas or soil in a construction trench while conducting excavation activities could pose a potentially significant health hazard during the construction/remediation phase of the project. Due to potential exposure to construction workers and residential users from impacted soils, a site-specific clean-up plan is required. Thus, the Regional Water Quality Control Board (RWQCB) opened up a new case to provide regulatory oversight for the investigation and remediation warranted to modify the project site's land use restriction and allow for residential use.

In a letter dated April 23, 2019 (see Attachment B of this Final IS/MND for a copy of the RWQCB's Approval of Remedial Action Plan letter), the RWQCB approved the proposed RAP for the project site's redevelopment as a residential use with some conditions, which the City will include a conditions of approval for the project. Adherence to these conditions will ensure that construction and operational activities are performed in a manner that reduces risk of hazard to the public, future site occupants, workers, and/or the environment.

In addition, consistent with MM-HAZ-1, project activities must adhere to the RWQCB-approved RAP, which includes measures for excavation and similar subsurface earthwork. MM-HAZ-2 is also required to minimize risk to those working and handling subsurface soils during the project construction phase.

VICTORIA GREENS
FINAL INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

Comment Letter #3
STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY

EDMUND G. BROWN Jr., Governor

DEPARTMENT OF TRANSPORTATION

DISTRICT 7 – Office of Regional Planning
100 S. MAIN STREET, MS 16
LOS ANGELES, CA 90012
PHONE (213) 897-9140
FAX (213) 897-1337
TTY 711
www.dot.ca.gov



*Making Conservation
a California Way of Life.*

February 13, 2019

Leila Carver
City of Carson
701 East Carson Street
Carson, CA 90745

RE: Victoria Greens – Mitigated Negative
Declaration (MND)
GTS # 07-LA-2019-02218
SCH# 2019011033
Vic. LA-91/PM: R 8.498

Dear Ms. Carver:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The proposed project involves the construction of a 175-unit multifamily residential community consisting of 95 three-story row townhome units and 80 three-story stacked flat units, a recreation center, a dog park, and a linear park contained in a secured, gated community.

After reviewing the Mitigated Negative Declaration (MND), Caltrans has the following comments:

- In the Synchro Report it shows 2% heavy vehicles, please verify truck volume counts. I-3-1
- Please include signal timing and cycle lengths that were used for intersection 4 (South Central Avenue/Artesia Boulevard) & intersection 5 (South Central Avenue/Albertoni Street) in the “Existing”, “Existing + Project”, “Future”, “Future +Project” versions, both AM and PM Peak Hour. 3-2
- In the Synchro Report, please include a 85% queueing analysis for intersection 4 (South Central Avenue/Artesia Boulevard) & intersection 5 (South Central Avenue/Albertoni Street) in the “Existing”, “Existing + Project”, “Future”, “Future +Project” versions, both AM and PM Peak Hour. 3-3
- The Construction and Phasing Section of the project’s anticipated earth-moving activities would result in approximately 3,780 one-way trips (1,890 round trips) during the grading phase. Caltrans recommends vehicles are covered when hauling dirt/sediment. Please be cautious of lost sediment spilling onto roads and state facilities during these trips as this can adversely impact state facilities. 3-4

As a reminder, any transportation of heavy construction equipment and/or materials which requires use of oversized-transport vehicles on State highways will need a Caltrans transportation permit. We recommend large size truck trips be limited to off-peak commute periods

*“Provide a safe, sustainable, integrated and efficient transportation system
to enhance California’s economy and livability”*

VICTORIA GREENS
FINAL INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

Ms. Carver
February 13, 2019
Page 2 of 2

If you have any questions regarding these comments, please contact project coordinator Reece Allen, at reece.allen@dot.ca.gov and refer to GTS# 07-LA-2019-02218

Sincerely,



MIYA EDMONSON
IGR/CEQA Branch Chief

*"Provide a safe, sustainable, integrated and efficient transportation system
to enhance California's economy and livability"*

Comment Letter 3 Miya Edmonson, IGR/CEQA Branch Chief, District 7 – Office of
Regional Planning, California Department of Transportation

Comment 3-1

Comment

In the Synchro Report it shows 2% heavy vehicles, please verify truck volume counts.

Response

Traffic counts collected for this project in 2018 did not disaggregate vehicle type. The Synchro standard 2% heavy truck proportion was originally assumed for the project analysis. Utilizing the 2017 AADT volumes available on Caltrans's website, heavy trucks represented 7.03% of overall vehicle traffic on the State Route 91 freeway mainline at the count location closest to the project site (Carson, Avalon Boulevard interchange). There is no data available on truck volumes on the ramps at that location, or at the specific study intersections in question (Central Avenue and Artesia Boulevard and Central Avenue and Albertoni Street), but it is reasonable to assume that the majority of trucks on the freeway mainline are traveling thru and not exiting at the study intersection, despite the somewhat industrial character of the study area, and that the proportion of trucks on the freeway off-ramp is therefore lower. However, to be conservative, we re-evaluated operations at the two freeway ramp study intersections utilizing a 7% heavy truck ratio. Utilizing this ratio did not change the project analysis outcomes, meaning that there are no significant project impacts either with a 2% or a 7% truck ratio. Tables 21 and 22 of the Draft IS/MND have been updated showing the results for the Existing, Existing plus Project, Future Base, and Future plus Project scenarios assuming a 7% heavy truck ratio. (See Section 3, Errata, of this Final IS/MND)

Comment 3-2

Comment

Please include signal timing and cycle lengths that were used for intersection 4 (South Central Avenue/Artesia Boulevard) & intersection 5 (South Central Avenue/Albertoni Street) in the "Existing", "Existing + Project", "Future", "Future + Project" versions, both AM and PM Peak Hour.

Response

The signal timing and cycle lengths utilized for the project impact analysis have been included in the revised version of the Transportation Impact Analysis report, dated Friday, June 7, 2019 (Attachment E to this Final IS/MND).

Comment 3-3

Comment

In the Synchro Report, please include an 85% queuing analysis for intersection 4 (South Central Avenue/Artesia Boulevard) & intersection 5 (South Central Avenue/Albertoni Street) in the "Existing", "Existing + Project", "Future", "Future + Project" versions, both AM and PM Peak Hour.

Response

Synchro queuing reports for the 50th and 95th percentiles have been included in the revised version of the Transportation Impact Analysis report, dated Friday, June 7, 2019 (Attachment E to this Final IS/MND). The 95th percentile queue reports indicate that the maximum queue lengths for the westbound exit ramp located at Central Avenue and Artesia Boulevard maxes out at an estimated 528 feet in the Future plus Project AM peak hour scenario, while the eastbound exit ramp located at Central Avenue and Albertoni Street maxes out at an estimated 591 feet in the Future plus Project PM peak hour scenario. Given the ramp lengths, even with the addition of the proposed project, the freeway exit ramp queue lengths do not approach 85% of the ramp storage. The following table illustrates this analysis.

Freeway Ramp 85% Queue Analysis

ID	N/S Street Name	E/W Street Name	Ramp Direction	Ramp Storage Length (feet)	85% Ramp Storage Length	Analyzed Period	Future + Project	
							95 percentile queue length (feet)	Exceeds 85% ramp storage?
4	S. Central Ave.	E. Artesia Blvd.	WB	1,444	1,227	AM	543	NO
						PM	429	NO
5	S. Central Ave.	E. Albertoni St.	EB	1,525	1,296	AM	409	NO
						PM	611	NO

Notes: N/S = north/south; E/W = east/west; V/C = volume-to-capacity; LOS = level of service.

¹ Methodologies and impact thresholds vary by jurisdiction.

Comment 3-4

Comment

The Construction and Phasing Section of the project’s anticipated earth-moving activities would result in approximately 3,780 one-way trips (1,890 round trips) during the grading phase. Caltrans recommends vehicles are covered when hauling dirt/sediment. Please be cautious of lost sediment spilling onto roads and state facilities during these trips as this can adversely impact state facilities.

Response

The project applicant will be required to contract with licensed and permitted hauling contractors to haul away the soils exported from the project site. All handling, transport, and storage of dirt/sediment will be required to comply with all applicable federal, state, and local regulations pertaining to the haul of soils/sediments, including provision aimed at preventing the loss of haul materials during transport.

Comment Letter #4



SENT VIA E-MAIL AND USPS:

icarver@carson.ca.us

Leila Carver, Planner
City of Carson, Community Development Department
701 East Carson Street
Carson, CA 90745

February 14, 2019

**Mitigated Negative Declaration (MND) for the Proposed
Victoria Greens**

South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the Lead Agency and should be incorporated into the Final MND.

SCAQMD Staff's Summary of Project Description

The Lead Agency proposes to construct 175 residential units and 23,665 square feet of recreational uses on eight acres (Proposed Project). The Proposed Project is located on the northeast corner of South Central Avenue and East Victoria Street in the City of Carson. Based on a review of the MND and aerial photographs, SCAQMD staff found that the Proposed Project is located within close proximity to State Route 91 (SR-91) and is immediately adjacent to a distribution center¹. Additionally, the Proposed Project site was historically used for oil exploration activities from 1920s through the late 1990s and contains eight abandoned oil wells². The site will undergo remedial action to remove residual petroleum hydrocarbons, arsenic, and lead³. Construction of the Proposed Project is expected to last approximately 36 months starting in June 2019⁴.

SCAQMD Staff's Summary of Air Quality Analysis

In the Air Quality Analysis section, the Lead Agency quantified the Proposed Project's construction and operational emissions and compared those emissions to SCAQMD's recommended regional and localized air quality CEQA significance thresholds. Based on the analyses, the Lead Agency found that the Proposed Project's construction and operational air quality impacts would be less than significant⁵. The Lead Agency also prepared a construction Health Risk Assessment (HRA) and compared the results to SCAQMD's CEQA significance threshold of 10 in one million for cancer risk⁶. The Lead Agency found that the Proposed Project's construction air quality impacts would result in an unmitigated Residential Maximum Individual Cancer Risk of 13.8 in one million⁷. After the implementation of Mitigation Measure (MM)-AQ-1, the Lead Agency found that the mitigated Residential Maximum Individual Cancer Risk would be 1.5 in one million⁸, which would be below SCAQMD's CEQA significance threshold of 10 in one million for cancer risk. MM-AQ-1 requires the use of Tier 4 Interim equipment of 75

4-1

¹ MND, Section 2, Pages 5-7.

² *Ibid.*

³ *Ibid.*, Appendix D: Remedial Action Plan for Impacted Soil Removal and Human Health Risk Assessment, Introduction, Pages 1-7.

⁴ *Ibid.*

⁵ *Ibid.*, Section 3.3, Pages 32-38.

⁶ SCAQMD has developed the CEQA significance threshold of 10 in one million for cancer risk. When SCAQMD acts as the Lead Agency, SCAQMD staff conducts a HRA, compares the maximum cancer risk to the threshold of 10 in one million to determine the level of significance for health risk impacts, and identifies mitigation measures if the risk is found to be significant.

⁷ *Ibid.*, Pages 38-39.

⁸ MND, Section 3.3, Pages 38-39.

Leila Carver

February 14, 2019

horsepower or greater if available⁹. If Tier 4 Interim equipment is not available, all other diesel-powered construction equipment will be classified as Tier 3 or higher, except when Tier 3 construction equipment is not available¹⁰.

Additionally, for the purpose of disclosing potential health risks to future residents living within close proximity of SR-91 and the adjacent distribution center, the Lead Agency prepared a mobile source HRA and found that the unmitigated Residential Maximum Cancer Risk from the toxic air contaminant (TAC)-emitting sources surrounding the Proposed Project would be 29.5 in one million¹¹. After the implementation of MM-AQ-2, which requires installation of high efficiency air filters with a Minimum Efficiency Reporting Value (MERV) of 13, the Lead Agency found that the mitigated Residential Maximum Cancer Risk would be reduced to 9 in one million, which is below SCAQMD's CEQA significance threshold of 10 in one million for cancer risk¹². As such, the Lead Agency found that the Proposed Project's health impacts related to TACs would be less than significant.

4-1
(cont.)

SCAQMD Staff's General Comments

Upon a review of the MND and the CalEEMod output files provided in Appendix A, *Emissions Calculations*, SCAQMD staff has concerns regarding the modeling parameter based on Tier 4 Interim equipment. MM-AQ-1 allows for the use of Tier 3 construction equipment when Tier 4 Interim equipment is not available, or a lower tier equipment when Tier 3 construction equipment is not available. It is not appropriate to use Tier 4 Interim equipment to quantify construction emissions in the modeling. Using Tier 4 Interim equipment takes credit for emission reductions from cleaner construction equipment that the Lead Agency has not fully committed to implementing since Tier 3 or even a lower tier construction equipment could be used during construction. Additionally, SCAQMD staff has comments on the limitations of enhanced filtration systems and recommends that the Lead Agency disclose these limitations in the Final MND. Please see the attachment for SCAQMD staff's detailed comments.

Conclusion

Pursuant to CEQA Guidelines Section 15074, prior to approving the Proposed Project, the Lead Agency shall consider the MND for adoption together with any comments received during the public review process. Please provide SCAQMD with written responses to all comments contained herein prior to the adoption of the Final MND. When responding to issues raised in the comments, response should provide sufficient details giving reasons why specific comments and suggestions are not accepted. There should be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful, informative, or useful to decision makers and the public who are interested in the Proposed Project. SCAQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact Alina Mullins, Assistant Air Quality Specialist, at amullins@aqmd.gov or (909) 396-2402, should you have any questions.

4-2

Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

Attachment
LS:AM
LAC190122-06
Control Number

⁹ MND, Page 39.

¹⁰ *Ibid.*

¹¹ *Ibid.* Page 40.

¹² *Ibid.*

Leila Carver

February 14, 2019

ATTACHMENT

Recommended Changes to Mitigation Measure (MM)-AQ-1:

1. As currently written in the MND, MM-AQ-1 proposes that all diesel-powered equipment 75 horsepower or greater be powered with California Air Resources Board (CARB) certified Tier 4 Interim engines, except where the equipment is not available. All other diesel-powered construction equipment will be Tier 3 or higher, except where the equipment is not available¹³. Although MM-AQ-1 requires the use of Tier 4 Interim diesel-powered equipment, “except where the project applicant establishes to the satisfaction of the City that Tier 4 Interim equipment is not available”, the CalEEMod mitigated modeling parameters assumed a full implementation and use of Tier 4 Interim diesel-powered equipment as a mitigation measure¹⁴. However, MM-AQ-1 allows for the use of Tier 3 construction equipment when Tier 4 Interim equipment is not available, or a lower tier equipment when Tier 3 construction equipment is not available. This makes the selection of “Tier 4 Interim” as a mitigation measure in CalEEMod not appropriate because it has likely led to an underestimation of the Proposed Project’s mitigated construction emissions by assuming that the Proposed Project is committed to emissions reductions from Tier 4 Interim equipment that cannot be achieved when Tier 3 or lower tier construction equipment is in use. To be consistent with the modeling assumption in CalEEMod, SCAQMD staff recommends that the Lead Agency revise MM-AQ-1 as follows. Alternatively, to be conservative, the Lead Agency may revise the CalEEMod mitigated modeling parameters by using either Tier 3, or a lower tier construction equipment, if reasonably expected, to quantify the Proposed Project’s mitigated construction emissions.

Additionally, SCAQMD staff recommends that the Lead Agency require all diesel-fueled equipment 50 horsepower or greater be powered with CARB Tier 4 Final engines. Where Tier 4 Final equipment is not available, the Proposed Project should use Tier 4 Interim, at a minimum.

Revised MM-AQ-1

Prior to the start of construction activities, the project applicant, or its designee, shall ensure that all ~~75~~ 50 horsepower or greater diesel-powered equipment are powered with California Air Resources Board certified Tier 4 Final engines, except where the project applicant establishes to the satisfaction of the City that Tier 4 ~~Interim~~ Final equipment is not available. ~~All other diesel-powered construction equipment will be classified as Tier 3 or higher, at a minimum, except where the project applicant establishes to the satisfaction of the City that Tier 3 equipment is not available.~~ In the case where the applicant is unable to secure a piece of equipment that meets the Tier 4 ~~Interim~~ Final requirement, the applicant may use Tier 4 Interim equipment, at a minimum upgrade another piece of equipment to compensate (from Tier 4 Interim to Tier 4 Final). Engine Tier requirements in accordance with this measure shall be incorporated on all construction plans.

To ensure that Tier 4 Final construction equipment or better will be used during the Proposed Project construction, SCAQMD staff recommends that the Lead Agency include this requirement in applicable bid documents, purchase orders, and contracts. Successful contractor(s) must demonstrate the ability to supply the compliant construction equipment for use prior to any ground disturbing and construction activities. A copy of each unit’s certified tier specification or model year specification and CARB or SCAQMD operating permit (if applicable) shall be available upon request at the time of mobilization of each applicable unit of equipment. Additionally, the Lead Agency should require periodic reporting and provision of written construction documents by construction contractor(s) to ensure compliance, and conduct regular inspections to the maximum extent feasible to ensure compliance. In the event that construction equipment cannot meet the Tier 4 Final engine certification, the Construction Contractor must demonstrate through future study

4-3

¹³ MND, Page 39.

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with written findings supported by substantial evidence that is approved by the Lead Agency before using 4 Interim emissions standards compliant construction equipment and/or other technologies/strategies. Alternative applicable strategies may include, but would not be limited to, reduction in the number and/or horsepower rating of construction equipment, using cleaner vehicle fuel, and/or limiting the number of individual construction project phases occurring simultaneously.

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4-3
(cont.)

Guidance on Siting Sensitive Receptors Near a High-Volume Freeway and Other Sources of Air Pollution

2. SCAQMD staff recognizes that there are many factors Lead Agencies must consider when making local planning and land use decisions. To facilitate stronger collaboration between Lead Agencies and SCAQMD to reduce community exposure to source-specific and cumulative air pollution impacts, SCAQMD adopted the *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning* in 2005¹⁵. This Guidance document provides recommended policies that local governments can use in their General Plans or through local planning to prevent or reduce potential air pollution impacts and protect public health.

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4-4

Limits to Enhanced Filtration Units

3. Notwithstanding the court rulings, SCAQMD staff recognizes that the Lead Agencies that approve CEQA documents retain the authority to include any additional information they deem relevant to assessing and mitigating the environmental impacts of a project. Based on a review of the MND, SCAQMD staff found that the Proposed Project is located in close proximity to SR-91, which had an annual average daily traffic (AADT) of 205,000 vehicles, including an AADT of 14,127 diesel-fueled trucks at Post Mile R7.426 in 2016¹⁶. Additionally, the Proposed Project is immediately adjacent to a distribution center, which is a potential source of air pollution because it is capable of generating or attracting heavy-duty, diesel-fueled trucks during operation that emit diesel particulate matter (DPM). The CARB has identified DPM as a toxic air contaminant based on its carcinogenic effects¹⁷. Because of SCAQMD's concern about the potential public health impacts of siting sensitive populations within close proximity to high-volume freeways and distribution centers, SCAQMD staff recommends that the Lead Agency review and consider the following comments when making local planning and land use decisions.

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4-5

Many strategies are available to reduce exposure, including, but not limited to, building filtration systems with Minimum Efficiency Reporting Value (MERV) 13 or better, or in some cases, MERV 15 or better is recommended; building design, orientation, location; vegetation barriers or landscaping screening, etc. Because of the potential adverse health risks involved with siting sensitive receptors near high-volume freeways and distribution centers, it is essential that any proposed strategy must be carefully evaluated before implementation.

Here, the Lead Agency requires the installation of high efficiency air filters with a MERV of 13 at the Proposed Project (MM-AQ-2). SCAQMD staff recommends that the Lead Agency consider the limitations of the enhanced filtration. For example, in a study that SCAQMD conducted to investigate filters¹⁸, a cost burden is expected to be within the range of \$120 to \$240 per year to replace each filter. The initial start-up cost could substantially increase if an HVAC system is not available and needs to be installed. In addition, because the filters would not have any effectiveness unless the HVAC

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¹⁵ South Coast Air Quality Management District. May 2005. "Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning" Accessed at: <http://www.aqmd.gov/docs/default-source/planning/air-quality-guidance/complete-guidance-document.pdf>

¹⁶ California Department of Transportation. Caltrans Traffic Volume Data for 2016. Route 91, Post Mile R7.426 (Carson, Avalon Blvd Interchange). Accessed at: <http://www.dot.ca.gov/trafficops/census/>.

¹⁷ California Air Resources Board. August 27, 1998. Resolution 98-35. Accessed at: <http://www.arb.ca.gov/regact/diesltac/diesltac.htm>.

¹⁸ This study evaluated filters rated MERV 13 or better. Accessed at: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/aqmdpilotstudyfinalreport.pdf>. Also see 2012 Peer Review Journal article by SCAQMD: <https://onlinelibrary.wiley.com/doi/10.1111/ina.12013>.

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system is running, there may be increased energy costs to the residents. 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. Moreover, these filters have no ability to filter out any toxic gases from vehicle exhaust. Therefore, the presumed effectiveness and feasibility of any filtration units should be carefully evaluated in more detail prior to assuming that they will sufficiently alleviate exposures to DPM emissions.

4-5
(cont.)

Enforceability of Enhanced Filtration Units

4. In MM-AQ-2, the Lead Agency stated that “the Homeowners Association property management for these multifamily residential receptors shall maintain the air filtration system on any HVAC system installed for the specified residential units in accordance with the manufacturer’s recommendations for the duration of the project¹⁹.” To ensure that the enhanced filtration units are enforceable throughout the lifetime of the Proposed Project and that they are effective in reducing exposures to DPM emissions, SCAQMD staff recommends that the Lead Agency provide additional details about the ongoing, regular maintenance, and monitoring of enhanced filters in the Final MND. To provide useful information to future residents at the Proposed Project, at a minimum, the Final MND should include the following information:

- Disclose the potential health impacts to prospective residents from living in a close proximity to freeways and distribution center and the reduced effectiveness of the air filtration system when windows are open and/or when residents are outdoors (e.g., in the common usable open space areas);
- Identify the responsible implementing and enforcement agency, such as the Lead Agency, to ensure that enhanced filtration units are installed on-site at the Proposed Project before a permit of occupancy is issued;
- Identify the responsible implementing and enforcement agency, such as the Lead Agency, to ensure that enhanced filtration units are inspected and maintained regularly;
- Disclose the potential increase in energy costs for running the HVAC system to prospective residents;
- Provide information to the members of the Homeowner’s Association on where the MERV filters can be purchased, if applicable;
- Provide recommended schedules (e.g., every year or every six months) for replacing the enhanced filtration units;
- Identify and disclose if there will be additional fees that will be collected by the Homeowner’s Association in order to maintain the enhanced filtration units, if applicable;
- Identify, provide, and disclose ongoing cost sharing strategies, if any, for replacing the enhanced filtration units;
- Set City-wide or Proposed Project-specific criteria for assessing progress in installing and replacing the enhanced filtration units to document and verify implementation at the Proposed Project;
- Develop a City-wide or Proposed Project-specific process for evaluating the effectiveness of the enhanced filtration units.

4-6

Compliance with SCAQMD Rules & Permits

5. Based on a review of Appendix D, *Remedial Action Plan for Impacted Soil Removal and Human Health Risk Assessment*, SCAQMD staff found that historical use of the site for oil exploration activities has left the site impacted with residual petroleum hydrocarbons, arsenic, and lead²⁰. Since

4-7

¹⁹ MND, Page 40.

²⁰ MND, Appendix D: Remedial Action Plan for Impacted Soil Removal and Human Health Risk Assessment, Introduction, Pages 1-7.

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preparation of the Proposed Project site would include soil remedial actions that might cause residual petroleum hydrocarbons, arsenic, and lead to become airborne, the Lead Agency should include a discussion to demonstrate compliance with SCAQMD Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil²¹ and Rule 1466 – Control of Particulate Emissions from Soils with Toxic Air Contaminants²² in the Air Quality Section of the Final MND.

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4-7
(cont.)

6. If remediation or any on-site activity involves equipment or operations which either emits or controls air pollution, SCAQMD staff should be consulted in advance to determine whether or not any permits or plans are required to be filed and approved by SCAQMD prior to start of any remedial activity. In the event that remedial actions require the use of stationary diesel-fueled internal combustion or compression engines (i.e., generators or firefighting equipment), emissions should be quantified and included in the construction emissions for the Proposed Project in the Final MND. The Final MND should also include a discussion to demonstrate compliance with SCAQMD Rule 1470 – Requirement for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines²³. If the use of stationary diesel-fueled internal combustion or compression engines requires a permit from SCAQMD, the Lead Agency should identify SCAQMD as a Responsible Agency for the Proposed Project in the Final MND. The assumptions in the Air Quality Analysis in the MND will be the basis for permit conditions and limits. For more information on permits, please visit SCAQMD’s webpage at: <http://www.aqmd.gov/home/permits>. Questions on permits can be directed to SCAQMD’s Engineering and Permitting staff at (909) 396-3385.

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²¹ South Coast Air Quality Management District. Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1166.pdf>.

²² South Coast Air Quality Management District. Rule 1466 – Control of Particulate Emissions from Soils with Toxic Air Contaminants. Accessed at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1466.pdf>.

²³ South Coast Air Quality Management District. Rule 1470 – Requirement for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1470.pdf>.

Comment Letter 4 Lijin Sun, JD, Program Supervisor, CEQA IGR, Planning,
Rule Development, and Area Sources, South Coast Air
Quality Management District

Comment 4-1

Comment

In the Air Quality Analysis section, the Lead Agency quantified the Proposed Project's construction and operational emissions and compared those emissions to SCAQMD's recommended regional and localized air quality CEQA significance thresholds. Based on the analyses, the Lead Agency found that the Proposed Project's construction and operational air quality impacts would be less than significant.¹ The Lead Agency also prepared a construction Health Risk Assessment (HRA) and compared the results to SCAQMD's CEQA significance threshold of 10 in one million for cancer risk². The Lead Agency found that the Proposed Project's construction air quality impacts would result in an unmitigated Residential Maximum Individual Cancer Risk of 13.8 in one million. After the implementation of Mitigation Measure (MM)-AQ-1, the Lead Agency found that the mitigated Residential Maximum Individual Cancer Risk would be 1.5 in one million, which would be below SCAQMD's CEQA significance threshold of 10 in one million for cancer risk. MM-AQ-1 requires the use of Tier 4 Interim equipment of 75 horsepower or greater if available³. If Tier 4 Interim equipment is not available, all other diesel-powered construction equipment will be classified as Tier 3 or higher, except when Tier 3 construction equipment is not available.

Additionally, for the purpose of disclosing potential health risks to future residents living within close proximity of SR-91 and the adjacent distribution center, the Lead Agency prepared a mobile source HRA and found that the unmitigated Residential Maximum Cancer Risk from the toxic air contaminant (TAC)-emitting sources surrounding the Proposed Project would be 29.5 in one million. After the implementation of MM-AQ-2, which requires installation of high efficiency air filters with a Minimum Efficiency Reporting Value (MERV) of 13, the Lead Agency found that the mitigated Residential Maximum Cancer Risk would be reduced to 9 in one million, which is below SCAQMD's CEQA significance threshold of 10 in one million for cancer risk. As such, the Lead Agency found that the Proposed Project's health impacts related to TACs would be less than significant.

¹ *Ibid.* Section 3.3. Pages 32-38.

² SCAQMD has developed the CEQA significance threshold of 10 in one million for cancer risk. When SCAQMD acts as the Lead Agency, SCAQMD staff conducts a HRA, compares the maximum cancer risk to the threshold of 10 in one million to determine the level of significance for health risk impacts, and identifies mitigation measures if the risk is found to be significant.

³ MND. Page 39.

SCAQMD Staff's General Comments

Upon a review of the MND and the CalEEMod output files provided in Appendix A, Emissions Calculations, SCAQMD staff has concerns regarding the modeling parameter based on Tier 4 Interim equipment. MM-AQ-1 allows for the use of Tier 3 construction equipment when Tier 4 Interim equipment is not available, or a lower tier equipment when Tier 3 construction equipment is not available. It is not appropriate to use Tier 4 Interim equipment to quantify construction emissions in the modeling. Using Tier 4 Interim equipment takes credit for emission reductions from cleaner construction equipment that the Lead Agency has not fully committed to implementing since Tier 3 or even a lower tier construction equipment could be used during construction. Additionally, SCAQMD staff has comments on the limitations of enhanced filtration systems and recommends that the Lead Agency disclose these limitations in the Final MND. Please see the attachment for SCAQMD staff's detailed comments.

Response

As stated in MM-AQ-1, the use of Tier 4 Interim equipment applies only to diesel-powered equipment that is 75 horsepower or greater. As indicated in MM-AQ-1, "in the case where the applicant is unable to secure a piece of equipment that meets the Tier 4 Interim requirement, the applicant may upgrade another piece of equipment to compensate (from Tier 4 Interim to Tier 4 Final)." As such, MM-AQ-1 does not allow for the use of Tier 3 construction equipment when Tier 4 Interim equipment is not available for construction equipment that is 75 horsepower or greater. To clarify this point, MM-AQ-1 has been revised. See Section 3, Errata, of this Final IS/MND.

MM-AQ-1 states, "all other diesel-powered construction equipment that is less than 75 horsepower may use Tier 3 equipment or higher at minimum, except where the project applicant establishes to the satisfaction of the City that Tier 3 equipment is not available." For the CalEEMod outputs for equipment less than 75 horsepower, Tier 2 or Tier 3 use was assumed. With implementation of Tier 2 or Tier 3 for equipment less than 75 horsepower, potential short-term construction impacts associated with health impacts related to TACs would be less than significant.

Therefore, since Tier 4 Interim equipment was used to quantify construction emissions for construction equipment that is 75 horsepower or greater, and since the language in MM-AQ-1 requires Tier 4 Final if Tier 4 Interim is not available for construction equipment that is 75 horsepower or greater, the analysis provided in Section 3.3, Air Quality, is consistent with the modeling.

Comment 4-2

Comment

Conclusion

Pursuant to CEQA Guidelines Section 15074, prior to approving the Proposed Project, the Lead Agency shall consider the MND for adoption together with any comments received during the public review process. Please

provide SCAQMD with written responses to all comments contained herein prior to the adoption of the Final MND. When responding to issues raised in the comments, response should provide sufficient details giving reasons why specific comments and suggestions are not accepted. There should be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful, informative, or useful to decision makers and the public who are interested in the Proposed Project. SCAQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact Alina Mullins, Assistant Air Quality Specialist, at amullins@aqmd.gov or (909) 396-2402, should you have any questions.

Response

The City's responses to agency and public comments received during the Draft IS/MND's public review period are provided in this Final IS/MND. All written comments received have been adequately responded to in accordance with CEQA Guidelines, Section 15074. The City will make this document publicly available prior to the project being considered by the City's decision makers for adoption.

Comment 4-3

Comment

Recommended Changes to Mitigation Measure (MM)-AQ-1

As currently written in the MND, MM-AQ-1 proposes that all diesel-powered equipment 75 horsepower or greater be powered with California Air Resources Board (CARB) certified Tier 4 Interim engines, except where the equipment is not available. All other diesel-powered construction equipment will be Tier 3 or higher, except where the equipment is not available. Although MM-AQ-1 requires the use of Tier 4 Interim diesel-powered equipment, "except where the project applicant establishes to the satisfaction of the City that Tier 4 Interim equipment is not available", the CalEEMod mitigated modeling parameters assumed a full implementation and use of Tier 4 Interim diesel-powered equipment as a mitigation measure¹⁴. However, MM-AQ-1 allows for the use of Tier 3 construction equipment when Tier 4 Interim equipment is not available, or a lower tier equipment when Tier 3 construction equipment is not available. This makes the selection of "Tier 4 Interim" as a mitigation measure in CalEEMod not appropriate because it has likely led to an underestimation of the Proposed Project's mitigated construction emissions by assuming that the Proposed Project is committed to emissions reductions from Tier 4 Interim equipment that cannot be achieved when Tier 3 or lower tier construction equipment is in use. To be consistent with the modeling assumption in CalEEMod, SCAQMD staff recommends that the Lead Agency revise MM-AQ-1 as follows. Alternatively, to be conservative, the Lead Agency may revise the CalEEMod mitigated modeling parameters by using either Tier 3, or a lower tier construction equipment, if reasonably expected, to quantify the Proposed Project's mitigated construction emissions.

Additionally, SCAQMD staff recommends that the Lead Agency require all diesel-fueled equipment 50 horsepower or greater be powered with CARB Tier 4 Final engines. Where Tier 4 Final equipment is not available, the Proposed Project should use Tier 4 Interim, at a minimum.

Revised MM-AQ-1

Prior to the start of construction activities, the project applicant, or its designee, shall ensure that all ~~75~~ 50 horsepower or greater diesel-powered equipment are powered with California Air Resources Board certified Tier 4 Final engines, except where the project applicant establishes to the satisfaction of the City that Tier 4 ~~Interim Final~~ equipment is not available. ~~All other diesel-powered construction equipment will be classified as Tier 3 or higher, at a minimum, except where the project applicant establishes to the satisfaction of the City that Tier 3 equipment is not available.~~ In the case where the applicant is unable to secure a piece of equipment that meets the Tier 4 ~~Interim Final~~ requirement, the applicant may use Tier 4 Interim equipment, at a minimum ~~upgrade another piece of equipment to compensate (from Tier 4 Interim to Tier 4 Final).~~ Engine Tier requirements in accordance with this measure shall be incorporated on all construction plans.

To ensure that Tier 4 Final construction equipment or better will be used during the Proposed Project construction, SCAQMD staff recommends that the Lead Agency include this requirement in applicable bid documents, purchase orders, and contracts. Successful contractor(s) must demonstrate the ability to supply the compliant construction equipment for use prior to any ground disturbing and construction activities. A copy of each unit's certified tier specification or model year specification and CARB or SCAQMD operating permit (if applicable) shall be available upon request at the time of mobilization of each applicable unit of equipment. Additionally, the Lead Agency should require periodic reporting and provision of written construction documents by construction contractor(s) to ensure compliance, and conduct regular inspections to the maximum extent feasible to ensure compliance. In the event that construction equipment cannot meet the Tier 4 Final engine certification, the Construction Contractor must demonstrate through future study with written findings supported by substantial evidence that is approved by the Lead Agency before using 4 Interim emissions standards compliant construction equipment and/or other technologies/strategies. Alternative applicable strategies may include, but would not be limited to, reduction in the number and/or horsepower rating of construction equipment, using cleaner vehicle fuel, and/or limiting the number of individual construction project phases occurring simultaneously.

Response

The City has revised the language in MM-AQ-1 for clarification. Refer to Section 3, Errata, of this Final IS/MND, which includes the changes to MM-AQ-1 as it related to the use of Tier 4 Interim Equipment. See Response 4-1 for further details.

Comment 4-4

Comment

Guidance on Siting Sensitive Receptors Near a High-Volume Freeway and Other Sources of Air Pollution

SCAQMD staff recognizes that there are many factors Lead Agencies must consider when making local planning and land use decisions. To facilitate stronger collaboration between Lead Agencies and SCAQMD to reduce community exposure to source-specific and cumulative air pollution impacts, SCAQMD adopted the *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning* in 2005. This Guidance document provides recommended policies that local governments can use in their General Plans or through local planning to prevent or reduce potential air pollution impacts and protect public health.

Response

The comment is acknowledged. As discussed in the SCAQMD adopted *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning*, the purpose of the document is this guidance document available to local governments as a tool to assist them as they develop or update their General Plans and make other planning decisions. Since the project does not involve the preparation of a General Plan or local planning document, the basis for analyzing the project's cumulatively considerable contribution is if the project's contribution accounts for a significant proportion of the cumulative total emissions (i.e., it represents a "cumulatively considerable contribution" to the cumulative air quality impact) and consistency with the SCAQMD 2016 AQMP, which addresses the cumulative emissions in the South Coast Air Basin.

Comment 4-5

Comment

Limits to Enhanced Filtration Units

Notwithstanding the court rulings, SCAQMD staff recognizes that the Lead Agencies that approve CEQA documents retain the authority to include any additional information they deem relevant to assessing and mitigating the environmental impacts of a project. Based on a review of the MND, SCAQMD staff found that the Proposed Project is located in close proximity to SR-91, which had an annual average daily traffic (AADT) of 205,000 vehicles, including an AADT of 14,127 diesel-fueled trucks at Post Mile R7.426 in 2016. Additionally, the Proposed Project is immediately adjacent to a distribution center, which is a potential source of air pollution because it is capable of generating or attracting heavy-duty, diesel-fueled trucks during operation that emit diesel particulate matter (DPM). The CARB has identified DPM as a toxic air contaminant based on its carcinogenic effects¹⁷. Because of SCAQMD's concern about the potential public health impacts of siting sensitive populations within close proximity to high-volume freeways and distribution centers, SCAQMD staff

recommends that the Lead Agency review and consider the following comments when making local planning and land use decisions.

Many strategies are available to reduce exposure, including, but not limited to, building filtration systems with Minimum Efficiency Reporting Value (MERV) 13 or better, or in some cases, MERV 15 or better is recommended; building design, orientation, location; vegetation barriers or landscaping screening, etc. Because of the potential adverse health risks involved with siting sensitive receptors near high-volume freeways and distribution centers, it is essential that any proposed strategy must be carefully evaluated before implementation.

Here, the Lead Agency requires the installation of high efficiency air filters with a MERV of 13 at the Proposed Project (MM-AQ-2). SCAQMD staff recommends that the Lead Agency consider the limitations of the enhanced filtration. For example, in a study that SCAQMD conducted to investigate filters¹⁸, a cost burden is expected to be within the range of \$120 to \$240 per year to replace each filter. The initial start-up cost could substantially increase if an HVAC system is not available and needs to be installed. In addition, because the filters would not have any effectiveness unless the HVAC system is running, there may be increased energy costs to the residents. 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. Moreover, these filters have no ability to filter out any toxic gases from vehicle exhaust. Therefore, the presumed effectiveness and feasibility of any filtration units should be carefully evaluated in more detail prior to assuming that they will sufficiently alleviate exposures to DPM emissions.

Response

As discussed in Section 3.3, Air Quality, of the Draft IS/MND, consistent with SCAQMD guidance, mitigation measures were evaluated to identify ways to ensure that future residents of the project would not be exposed to health risks that exceed SCAQMD's significance thresholds and to ensure that impacts related to community risk and hazards from placement of sensitive receptors proximate to major sources of TACs would be less than significant.

The American Society of Heating, Refrigerating, and Air-Conditioning Engineers (ASHRAE) reported that the Minimum Efficiency Reporting Value (MERV) 13 filters remove 90% of particles ranging from 1 to 3 microns, and less than 75% for particles ranging from 0.3 to 1 microns (ASHRAE 2007). ASHRAE reported that MERV 16 filters remove 95% of particles ranging from 0.3 to 1 microns and larger. In a study conducted by Fisk et al. on the performance and costs of particulate air filtration technologies, it was shown that if the ventilation systems are operated with one air exchange per hour of outside air and four air exchanges per hour of recirculated air: (i) MERV 13 (ASHRAE Dust Spot 85%) filters provide an 80% or greater reduction of outdoor fine particulate matter (such as DPM); and (ii) MERV 16 (ASHRAE Dust Spot 95%) filters provide a 95% or greater reduction of outdoor fine particulate matter (Fisk et al. 2002). Additionally, to account for exposure of DPM inside and outside the residence, the emissions incorporated an

87% time spent inside factor,⁴ which equates to the amount of time that particulate exposure would be reduced by the MERV 13 filters. For this analysis, it was assumed that exposure to DPM would be reduced by a total of 68% based on the substantial evidence that supports that MERV 13 filters can provide an 80% or greater reduction of fine particulate matter, as well as accounting for the time spent inside versus outside the residence.

In consideration of the available literature, the City determined the most effective way to reduce the interior health risks to residents associated with SR-91 was the installation of high-efficiency filters (i.e., MERV 13 filters or better). As such, MM-AQ-2, requires the installation of high-efficiency filters (i.e., MERV 13 filters or better).

Comment 4-6

Comment

Enforceability of Enhanced Filtration

In MM-AQ-2, the Lead Agency stated that “the Homeowners Association property management for these multifamily residential receptors shall maintain the air filtration system on any HVAC system installed for the specified residential units in accordance with the manufacturer’s recommendations for the duration of the project.” To ensure that the enhanced filtration units are enforceable throughout the lifetime of the Proposed Project and that they are effective in reducing exposures to DPM emissions, SCAQMD staff recommends that the Lead Agency provide additional details about the ongoing, regular maintenance, and monitoring of enhanced filters in the Final MND. To provide useful information to future residents at the Proposed Project, at a minimum, the Final MND should include the following information:

- Disclose the potential health impacts to prospective residents from living in a close proximity to freeways and distribution center and the reduced effectiveness of the air filtration system when windows are open and/or when residents are outdoors (e.g., in the common usable open space areas);
- Identify the responsible implementing and enforcement agency, such as the Lead Agency, to ensure that enhanced filtration units are installed on-site at the Proposed Project before a permit of occupancy is issued;
- Identify the responsible implementing and enforcement agency, such as the Lead Agency, to ensure that enhanced filtration units are inspected and maintained regularly;
- Disclose the potential increase in energy costs for running the HVAC system to prospective residents;
- Provide information to the members of the Homeowner’s Association on where the MERV filters can be purchased, if applicable;

⁴ Based on a study conducted by CARB and University of California, Berkeley, *Activity Patterns of California Residents* (CARB 1991).

- Provide recommended schedules (e.g., every year or every six months) for replacing the enhanced filtration units;
- Identify and disclose if there will be additional fees that will be collected by the Homeowner's Association in order to maintain the enhanced filtration units, if applicable;
- Identify, provide, and disclose ongoing cost sharing strategies, if any, for replacing the enhanced filtration units;
- Set City-wide or Proposed Project-specific criteria for assessing progress in installing and replacing the enhanced filtration units to document and verify implementation at the Proposed Project;
- Develop a City-wide or Proposed Project-specific process for evaluating the effectiveness of the enhanced filtration units.

Response

The Mitigation Monitoring and Reporting Program prepared for the project requires the lead agency to serve as the responsible agency for ensuring implementation of the enhanced filtration units. The project's Covenants, Conditions, and Restrictions (CC&Rs) will include a clause that requires residents to operate and maintain their heating, ventilation, and air conditioning (HVAC) systems, including MERV filters, to manufacturer's specifications. Future residents will be made aware of this requirement prior to purchasing their residential unit. Thus, the requirements to maintain the MERV filter system, as well as costs associated with such maintenance requirements, will be disclosed early on and should not be surprising to residents.

The City will take SCAQMD's recommendations pertaining to what should be included in disclosures, and will require via project Conditions of Approval that the project's CC&Rs/disclosures include all pertinent/feasible recommendations.

Comment 4-7

Comment

Compliance with SCAQMD Rules and Permits

Based on a review of Appendix D, *Remedial Action Plan for Impacted Soil Removal and Human Health Risk Assessment*, SCAQMD staff found that historical use of the site for oil exploration activities has left the site impacted with residual petroleum hydrocarbons, arsenic, and lead. Since preparation of the Proposed Project site would include soil remedial actions that might cause residual petroleum hydrocarbons, arsenic, and lead to become airborne, the Lead Agency should include a discussion to demonstrate compliance with SCAQMD Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil and Rule 1466 – Control of Particulate Emissions from Soils with Toxic Air Contaminants in the Air Quality Section of the Final MND.

Response

Refer to Section 3, Errata, of this Final IS/MND, which includes a discussion on SCAQMD Rule 1166 and Rule 1466 as it relates to VOCs and TACs, respectively.

Comment 4-8

Comment

If remediation or any on-site activity involves equipment or operations which either emits or controls air pollution, SCAQMD staff should be consulted in advance to determine whether or not any permits or plans are required to be filed and approved by SCAQMD prior to start of any remedial activity. In the event that remedial actions require the use of stationary diesel-fueled internal combustion or compression engines (i.e., generators or firefighting equipment), emissions should be quantified and included in the construction emissions for the Proposed Project in the Final MND. The Final MND should also include a discussion to demonstrate compliance with SCAQMD Rule 1470 – Requirement for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines. If the use of stationary diesel-fueled internal combustion or compression engines requires a permit from SCAQMD, the Lead Agency should identify SCAQMD as a Responsible Agency for the Proposed Project in the Final MND. The assumptions in the Air Quality Analysis in the MND will be the basis for permit conditions and limits. For more information on permits, please visit SCAQMD's webpage at: <http://www.aqmd.gov/home/permits>. Questions on permits can be directed to SCAQMD's Engineering and Permitting staff at (909) 396-3385.

Response

The City will take into consideration SCAQMD's recommendations pertaining to consultation prior to remediation activity. In regards to the type of equipment required for remedial actions, as stated in Section 3.8, Hazards and Hazardous Materials, of the Draft IS/MND, excavation will be conducted with conventional excavation equipment (i.e., backhoes, excavators, bobcats, etc.).

SCAQMD Rule 1470 applies to project's that use stationary diesel-fueled internal combustion or compression engines. As discussed in Section 3.3, Air Quality, of the Draft IS/MND, construction and operation of the project would not require use of any stationary sources (e.g., diesel generators, boilers). As such, SCAQMD Rule 1470 is not applicable to the project.

VICTORIA GREENS
FINAL INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

Comment Letter #5



DARYL L. OSBY
FIRE CHIEF
FORESTER & FIRE WARDEN

COUNTY OF LOS ANGELES
FIRE DEPARTMENT

1320 NORTH EASTERN AVENUE
LOS ANGELES, CALIFORNIA 90063-3224
(323) 881-2401
www.fire.lacounty.gov

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FIFTH DISTRICT



February 12, 2019

Leila Carver, Planner
City of Carson
Community Development Department
701 East Carson Street
Carson, CA 90745

Dear Mr. Carver:

NOTICE OF INTENT TO ADOPT A MITIGATED NEGATIVE DECLARATION, "VICTORIA GREENS," INVOLVES THE CONSTRUCTION OF A 175-UNIT MULTI-FAMILY RESIDENTIAL COMMUNITY CONSISTING OF 95 THREE-STORY ROW TOWNHOME UNITS AND 80 THREE-STORY STACKED FLAT UNITS, A RECREATION CENTER, A DOG PARK, AND A LINEAR PARK CONTAINED IN A SECURED, GATED COMMUNITY, CARSON, FFER 201900008

The Notice of Intent to Adopt a Mitigated Negative Declaration has been reviewed by the Planning Division, Land Development Unit, Forestry Division, and Health Hazardous Materials Division of the County of Los Angeles Fire Department.

The following are their comments:

PLANNING DIVISION:

We have no comments.

5-1

LAND DEVELOPMENT UNIT:

The County of Los Angeles Fire Department Fire Prevention Land Development review of the Tentative Tract Map 78226 for the proposed construction of a 175 Unit Multi-family Residential Units also known as "Victoria Greens," has been satisfied at this time. The Final Map shall be submitted for review and approval prior to recordation.

5-2

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

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

Leila Carver, Planner
February 12, 2019
Page 2

Should any questions arise regarding subdivision, water systems, or access, please contact the County of Los Angeles Fire Department Land Development Unit's, Inspector Nancy Rodeheffer at (323) 890-4243.

5-2
(cont.)

The County of Los Angeles Fire Department's Land Development Unit appreciates the opportunity to comment on this project.

FORESTRY DIVISION – OTHER ENVIRONMENTAL CONCERNS:

The statutory responsibilities of the County of Los Angeles Fire Department's Forestry Division include erosion control, watershed management, rare and endangered species, vegetation, fuel modification for Very High Fire Hazard Severity Zones, archeological and cultural resources, and the County Oak Tree Ordinance. Potential impacts in these areas should be addressed.

Under the Los Angeles County Oak tree Ordinance, a permit is required to cut, destroy, remove, relocate, inflict damage or encroach into the protected zone of any tree of the Oak genus which is 25 inches or more in circumference (eight inches in diameter), as measured 4 1/2 feet above mean natural grade.

5-3

If Oak trees are known to exist in the proposed project area further field studies should be conducted to determine the presence of this species on the project site.

The County of Los Angeles Fire Department's Forestry Division has no further comments regarding this project.

HEALTH HAZARDOUS MATERIALS DIVISION:

The Health Hazardous Materials Division of the Los Angeles County Fire Department has no comments or requirements for the project at this time.

5-4

If you have any additional questions, please contact this office at (323) 890-4330.

Very truly yours,



MICHAEL Y. TAKESHITA, ACTING CHIEF, FORESTRY DIVISION
PREVENTION SERVICES BUREAU

MYT:ac

Comment Letter 5 Michael Y. Takeshita, Acting Chief, Forestry Division
Prevention Services Bureau, Los Angeles Fire Department

Comment 5-1

Comment

Planning Division

We have no comments.

Response

The City appreciates the Planning Division's review of the Draft IS/MND.

Comment 5-2

Comment

Land Development Unit

The County of Los Angeles Fire Department Prevention Land Development review of the Tentative Tract Map 78226 for the proposed construction of a 175 Unit Multi-family Residential Units also known as "Victoria Greens," has been satisfied at this time. The Final Map shall be submitted and approval prior to recordation.

Should any questions arise regarding subdivision, water systems, or access, please contact the County of Los Angeles Fire Department Land Development Unit's, Inspector Nancy Rodeheffer (32) 890-4243.

The County of Los Angeles Fire Departments Land Development Unit appreciates the opportunity to comment on this project.

Response

The City appreciates the Land Development Unit's review of the Draft IS/MND. The City will submit the final map to the Los Angeles Fire Department Prevention Land Development prior to recordation.

Comment 5-3

Comment

Forestry Division- Other Environmental Concerns

The statutory responsibilities of the County of Los Angeles Fire Department Forestry's Forest Division include erosion control, watershed management, rare and endangered species, vegetation, fuel modification for Very

High Fire Hazard Severity Zones, archaeological and cultural resources, and the County Oak Tree Ordinance. Potential impacts in these areas should be addressed.

Under the Los Angeles County Oak Tree Ordinance, a permit is required to cut, destroy, remove, relocate, inflict damage or encroach into the protected zone of any tree of the Oak genus which is 25 inches or more in circumference (eight inches in diameter), as measured 4 ½ feet above natural grade.

If Oak trees are known to exist in the proposed project area further field studies should be conducted to determine the presence of this species on the project site.

The County of Los Angeles Fire Department's Forestry Division has no further comments regarding this project.

Response

The City appreciates the Forestry Division's review of the Draft IS/MND. The Draft IS/MND evaluates impacts regarding erosion control in Section 3.6, Geology and Soils; rare and endangered species, vegetation, and the County's Tree Ordinance in Section 3.4, Biological Resources; Very High Fire Hazard Severity Zones in Section 3.8, Hazards and Hazardous Materials; and archaeological and cultural resources in Section 3.5, Cultural Resources.

In regards to the Los Angeles County Oak Tree Ordinance, no known Oak trees exist on the project area. As further discussed in Section 3.4, Biological Resources, of the Draft IS/MND, no native habitat is located on the project site or in the immediately surrounding area. On-site plant species are limited to non-native, ornamental species located near the northwest perimeter of the site, as well as a non-native eucalyptus tree near the southwest perimeter of the site.

Comment 5-4

Comment

Health Hazardous Materials Division

The Health Hazardous Materials Division of the Los Angeles County Fire Department has no comments or requirements for the project at this time.

Response

The City appreciates the Health Hazardous Materials Division's review of the Draft IS/MND.

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3 ERRATA

The following provides minor revisions, corrections, and additions to the Draft IS/MND. The corrections and additions are organized by section and page number of the Draft IS/MND. New text additions are shown in underline format, and deletions are shown in ~~strikeout~~ format.

Since the release of the Draft IS/MND, the Specific Plan Amendment permit number requested for the proposed project has been changed from Specific Plan Amendment No.4-18 to Specific Plan Amendment No.4-93 Revision 4. As such all references to the previous Specific Plan Amendment permit number have been revised as follows:

Section 1 – Introduction

Page 1

The City of Carson (City) received a development application from The Carson Project Owner LLC (applicant) requesting the approval of the following discretionary actions for the proposed Victoria Greens project (project):

- Design Overlay Review (DOR) No. 1695-18
- Conditional Use Permit (CUP) No. 1040-18
- Tentative Tract Map (TTM) No. 78226-18
- Specific Plan Amendment (SPA) No. ~~4-18~~93 Revision 4
- Development Agreement (DA) No. 19-18

Page 2

The project site is located on a property that was previously analyzed in the Dominguez Hills Specific Plan EIR (City of Carson 1995). The Dominguez Hills Specific Plan EIR identified the potential impacts of implementation of the original Dominguez Hills Specific Plan (Specific Plan). Approval of the proposed project would result in Specific Plan Amendment (SPA No. ~~4-18~~93 Revision 4), which would revise the land use designation of the project site from Tank Farm, Retail, and Industrial to Single-Family Attached (Townhome).

Section 2.5 – Project Approvals

The project would require the following approvals prior to the issuance of demolition, grading, and building permits:

- Design Overlay Review (DOR No. 1695-18) to review and permit the design of the project.
- Conditional Use Permit (CUP No. 1040-18) to change the existing zoning from Commercial/Industrial to High Density Residential.

- Tentative Tract Map (TTM No. 78226-18) to consolidate three parcels to allow for the development of the proposed 175-unit condominium project.
- Specific Plan Amendment (SPA No~~4-1893~~ Revision 4) to revise the development standards and zoning within the existing Dominguez Hills Specific Plan.
- Development Agreement (DA) No. 19-18 to enter into binding development agreement.

Section 2.2 – Environmental Setting

Page 5

Dominguez Hills Village Specific Plan

The Specific Plan consists of Parcel 1 located at the northwest corner and Parcel 2 located at the northeast corner of E. Victoria Street and S. Central Avenue. The current Specific Plan area consists of 99.4 acres, of which 72 acres are on Parcel 1, and 27.4 acres are to the east of S. Central Avenue on Parcel 2.

Pursuant to the Specific Plan, at full buildout, a maximum of ~~898~~ 893 homes would be constructed on Parcel 1, along with a 1.6-acre childcare center, 3.3 acres of open space, and associated residential roadways and landscaping. Parcel 1, intended as the residential element, would provide single-family detached homes, duplex homes, courtyard type townhomes, and two-story townhomes. A revision to the Specific Plan in 1999 reduced the maximum residential buildout in the Specific Plan area to 650 dwelling units. Parcel 2 was originally set aside for a 50,000-square-foot retail center and 350,000-square-foot industrial lease space. The retail center was to serve the adjacent community residences on Parcel 1. Parcel 2 was also intended to house a tank farm, which is an oil production, storage, and distribution facility to be relocated from Parcel 1. At the time the Specific Plan was prepared, Parcel 2 was used as an oil production facility.

Since the approval of the Specific Plan, Parcel 1 to the west of S. Central Avenue has been built out as described previously. Parcel 2 is developed primarily with industrial uses along E. Victoria Street and includes the vacant project site.

Page 7

Surrounding Land Uses

- West: The adjacent parcels, also located at the northeast corner of S. Central Avenue and E. Victoria Street, is a Verizon property with an existing communication tower and a natural gas pipeline owned and operated by Southern California Gas. The Dominguez Hills Village residential use on Parcel 1 of the Specific Plan area is located to the west S. Central Avenue.

Section 3.3 – Air Quality

Page 39

MM-AQ-1 To reduce the potential for health risks as a result of construction of the project, the applicant shall:

- Prior to the start of construction activities, the project applicant, or its designee, shall ensure that all 75 horsepower or greater diesel-powered equipment are powered with California Air Resources Board certified Tier 4 Interim engines, except where the project applicant establishes to the satisfaction of the City that Tier 4 Interim equipment is not available. In the case where the applicant is unable to secure a piece of equipment that meets the Tier 4 Interim requirement, the applicant may upgrade another piece of equipment to compensate (from Tier 4 Interim to Tier 4 Final). Engine Tier requirements in accordance with this measure shall be incorporated on all construction plans.
- All other diesel-powered construction equipment will be classified as Tier 3 or higher, at a minimum, except where the project applicant establishes to the satisfaction of the City that Tier 3 equipment is not available.

~~In the case where the applicant is unable to secure a piece of equipment that meets the Tier 4 Interim requirement, the applicant may upgrade another piece of equipment to compensate (from Tier 4 Interim to Tier 4 Final). Engine Tier requirements in accordance with this measure shall be incorporated on all construction plans.~~

Additionally, the project would comply with SCAQMD Rule 1466, which states that when earth-moving activities or vehicular movement occurs, the owner or operator shall conduct continuous direct-reading near real-time ambient monitoring of concentrations of PM₁₀ to minimize the amount of off-site fugitive dust containing TACs.

Page 41

Health Impacts of Other Criteria Air Pollutants

Construction and operation of the project would result in emissions that would not exceed the SCAQMD thresholds for any criteria air pollutants including VOC, NO_x, CO, SO_x, PM₁₀, or PM_{2.5}. VOCs would be associated with motor vehicles, construction equipment, and architectural coatings; however, project-generated

VOC emissions would not result in the exceedances of the SCAQMD thresholds. Generally, the VOCs in architectural coatings are of relatively low toxicity. In addition, SCAQMD Rule 1113 restricts the VOC content of coatings for both construction and operational applications. Further, SCAQMD Rule 1166 sets requirements to control emission of VOCs from excavation activities.

Section 3.12 – Noise

Existing Noise Levels

Page 75

Existing noise sources include nine large air conditioners present on the northern side of the Verizon facility. In addition, due to the numerous distribution warehouses in the surrounding area, heavy-duty trucks use S. Central Avenue, E. Victoria Street, and nearby SR-91 to transport goods 24 hours per day. The delivery truck activity is in addition to normal vehicular traffic. Airplanes from the Compton/Woodley Airport, located approximately 1.3 miles to the north, contribute to the existing noise environment as well. In addition, the SoCalGas operations generate noise from the above ground pressure limited run, as well as the on-going construction activity at the station for the various projects in the area including blowdown activities.

Page 80

In lieu of the previously proposed temporary sound wall that was required in MM-NOI-4, the project applicant has proposed to construct the permanent wall along the northern property boundary prior to commencing any other heavy construction activities on the project site. This permanent wall will be the same height (8 feet) and will have the same – if not improved – noise attenuating qualities as the previously proposed temporary sound wall, and thus, will serve the same purpose (attenuating noise experienced at nearby noise-sensitive uses to the north of the Project site) as the original requirements identified in the Draft IS/MND (see Attachment D of this Final IS/MND for a copy of the Update to Construction Noise Impact Planning memorandum).

MM-NOI-4 Prior to start of any heavy construction activities on the project site, the northern periphery of the site shall be graded and a permanent 8-foot-tall wall shall be constructed along the property's northern boundary. Temporary sound barriers or sound blankets shall be installed between construction operations and adjacent noise sensitive receptors. Due to equipment exhaust pipes being approximately 7 to 8 feet above ground, a sound wall at least 10 feet in height above grade. The wall shall be located along the northern property line between the project and neighboring daycare facility, from S. Central Avenue east along the unnamed driveway between the site and daycare for approximately 180 feet. To reduce noise levels effectively, the sound barrier should be constructed of a material with a minimum weight of 2 pounds per square foot with no

gaps or perforations, and shall remain in place until the conclusion of demolition, grading, and construction activities.

Section 3.16 – Transportation and Traffic

Freeway Ramp Level of Service Results

Tables 21 and 22 presents a summary of ramp intersection LOS analysis using the HCM methodology for existing and existing plus project conditions, and future and future plus project conditions, respectively. The Existing and Existing plus Project traffic volumes were analyzed to determine the projected delay and LOS for each of the analyzed ramp intersections.

Table 21
Existing Plus Project Ramp Intersection LOS and Impact Analysis

ID	N/S Street Name	E/W Street Name	Intersection Control	Analyzed Period	Future		Future + Project		Project Increase In Delay (sec)	Significant Impact?
					Delay (sec)	LOS	Delay (sec)	LOS		
4	S. Central Ave.	E. Artesia Blvd.	Signalized	AM	25.8	C	27.4	C	1.6	NO
					<u>24.6</u>		<u>26.3</u>		<u>1.7</u>	
					18.9	B	19.2	C	0.3	NO
					<u>19.6</u>		<u>23.0</u>		<u>3.4</u>	
5	S. Central Ave.	E. Albertoni St.	Signalized	AM	26.4	C	26.2	C	-0.2	NO
					<u>24.5</u>		<u>25.1</u>		<u>0.6</u>	
					22.2	C	22.4	C	0.2	NO
					<u>23.2</u>		<u>23.6</u>		<u>0.4</u>	

Notes: N/S = north/south; E/W = east/west; LOS = level of service.

Table 22
Future Year (2020₁) Plus Project Ramp Intersection LOS and Impact Analysis

ID	N/S Street Name	E/W Street Name	Intersection Control	Analyzed Period	Future		Future + Project		Project Increase In Delay (sec)	Significant Impact?
					Delay (sec)	LOS	Delay (sec)	LOS		
4	S. Central Ave.	E. Artesia Blvd.	Signalized	AM	30.8	C	33.4	C	2.3	NO
					<u>30.4</u>		<u>32.0</u>		<u>1.6</u>	
					26.9	C	28.1	C	1.2	NO
					<u>39.6</u>	D	41.0	D	1.4	
5	S. Central Ave.	E. Albertoni St.	Signalized	AM	25.7	C	25.6	C	-0.1	NO
					<u>46.9</u>	D	<u>47.8</u>	D	<u>0.9</u>	
					24.0	C	24.6	C	0.6	NO
					<u>41.8</u>	D	<u>43.5</u>	D	<u>1.7</u>	

Notes: N/S = north/south; E/W = east/west; LOS = level of service.

Figure 4, Site Plan

Figure 4 (see Attachment A of this Final IS/MND) has been updated to reflect minor refinements to the project site plan since the start of the public review period for the Draft IS/MND.

Appendix D, Remedial Action Plan for Impact Soil Removal and Human Health Risk Assessment

Appendix D (see Attachment B of this Final IS/MND) has been updated to include the Revised Remedial Action Plan, RWQCB's Approval of Remedial Action Plan letter, the Revised Human Health Risk Assessment report, and the Approval of Human Health Risk Assessment letter.

Appendix E, Sewer Capacity

Appendix E (see Attachment C of this Final IS/MND) has been updated to include the Sewer System Hydraulic Analysis report and the City's approval of the Hydrology Report and LID Plan.

Appendix F, Noise

Appendix F (see Attachment D of this Final IS/MND) has been updated to include the Update to Construction Noise Impact Planning memorandum.

Appendix G, Transportation Impact Analysis

Appendix G (see Attachment E of this Final IS/MND) has been updated to include the updated Transportation Impact Analysis report.

4 REFERENCES CITED

- ASHRAE (American Society of Heating, Refrigerating, and Air-Conditioning Engineers Inc.). 2007. *Method of Testing General Ventilation Air-Cleaning Devices for Removal Efficiency by Particle Size*. ANSI/ASHRAE Standard 52.2-2007.
- Fisk, W.J., D. Faulkner, J. Palonen, and O. Seppanen. 2002. "Performance and Costs of Particle Air Filtration Technologies." *Indoor Air* 12: 223–234.
- SCAQMD. 2018. "SCAQMD Modeling Guidance for AERMOD." Accessed April 2018. <http://www.aqmd.gov/home/air-quality/air-quality-data-studies/meteorological-data/modeling-guidance>.

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ATTACHMENTS A-E

On attached CD

