

Appendix A
**Notice of Preparation (NOP) and
Comments on the NOP**





CITY OF CARSON ORIGINAL FILED

August 1, 2017

AUG 01 2017

LOS ANGELES COUNTY CLERK

NOTICE OF PREPARATION OF A SUPPLEMENTAL ENVIRONMENTAL IMPACT REPORT

Pursuant to request by the Carson Reclamation Authority (CRA), a California joint powers authority, the City of Carson (City) will be considering an amendment to the Boulevards at South Bay Specific Plan adopted by the City (to be renamed "The District at South Bay Specific Plan") and related improvements. The CRA and City have agreed that the City shall serve as the lead agency in connection with review under the California Environmental Quality Act (CEQA) of the proposed project (also referred to as the District at South Bay). Pursuant to Section 15082(a) of the CEQA Guidelines (14 C.C.R. Section 1500 et seq.), the City has determined that a Supplemental Environmental Impact Report (SEIR) is required to be prepared. The project location and project description are further described below. Although issuance of an NOP is not required in connection with supplemental environmental analysis, the City is issuing this NOP to provide notice of its intent to proceed with an SEIR and to request input regarding the scope and content of the SEIR.

PROJECT NAME: The District at South Bay (formerly "Carson Marketplace" and/or "The Boulevards at South Bay").

PRIOR EIR/PRIOR APPROVALS: The Boulevards at South Bay Specific Plan was previously analyzed pursuant to Final Environmental Impact Report for the Carson Marketplace (SCH No. 2005051059) certified by the City of Carson in 2006.

PROJECT LOCATION/ADDRESS: The proposed revised project site is located in the City of Carson, approximately 17 miles south of downtown Los Angeles and approximately 6.5 miles east of the Pacific Ocean. The site is in the South Bay area of Los Angeles County and is currently undeveloped. The entire project site is comprised of approximately 168 acres located southwest of the San Diego Freeway (I-405) at and north of the Avalon Boulevard interchange. However, the proposed revisions are as to only the commercially zoned land located south of Del Amo, comprising approximately 157 acres of the overall project site located southwest of the San Diego Freeway (I-405) at, and north of, the Avalon Boulevard interchange. The 11 acres located north of Del Amo has been approved for residential uses and is not proposed to be a part of the

revised project, but it will be considered as a related project as appropriate in the SEIR. Figure 1 depicts the entire project site, as well as the proposed revised project site.

PROJECT DESCRIPTION: The existing project is proposed to be updated by amending the Specific Plan and other items as more fully described in the Supplement to the 2006 EIR. The City, as lead agency, is proposing to prepare a Supplemental EIR (“SEIR”) to the 2006 EIR to evaluate the changes proposed by the revised project to the previously approved project, and to determine whether changes in circumstances surrounding the project site and the original project (if any), and new information (if any), require further analysis under CEQA. As addressed by the 2006 EIR, 157 acres of the revised project site is a former landfill, which is currently undergoing cleanup in accordance with the 1995 Remediation Action Plan established for the site.

The proposed revised project would retain the wide range of land uses adopted by the City under The Boulevards at South Bay Specific Plan (Specific Plan), now proposed to be renamed The District at South Bay, including the following uses: neighborhood commercial, regional commercial (including outlet commercial), commercial recreation/entertainment, restaurant, hotel, and residential. Specifically, the revised project would modify or otherwise reduce the scope of the original project to ultimately consist of approximately 1,601,500 sq. ft. of regional commercial, general commercial and related uses, including outlet and entertainment uses, no more than 1,250 residential units, and 350 rooms total in two hotels. Overall, with these proposed modifications, the overall square footage is roughly equivalent to that studied for the project in the 2006 EIR.

The 2006 EIR previously assessed proposed remediation of the project site. The proposed revised project retains the phased remediation of the project site and the subsequent development of urban uses, although clarifications are provided as to how development will be proposed to take place in phases. These will require approval by the Department of Toxic Substances Control as appropriate.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED: The original project has already been environmentally assessed under the 2006 EIR, which retains significant informational value. The purpose of the SEIR is to assess the proposed modifications and updates to the existing project to determine if they involve new significant impacts that were not previously evaluated in the 2006 EIR. In doing so, the focus will be on the incremental differences between the original project and the proposed revised project when evaluating whether the modifications to the original proposal would result in any significant environmental impacts. In this regard, the SEIR will supplement the 2006 EIR by evaluating potential revised project impacts related to the following potential environmental effects: Aesthetics, Air Quality,

Energy, Geology and Soils, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Surface Water Quality, Land Use, Noise and Vibration, Public Safety, Recreation, Transportation and Traffic, and Utilities and Service Systems.

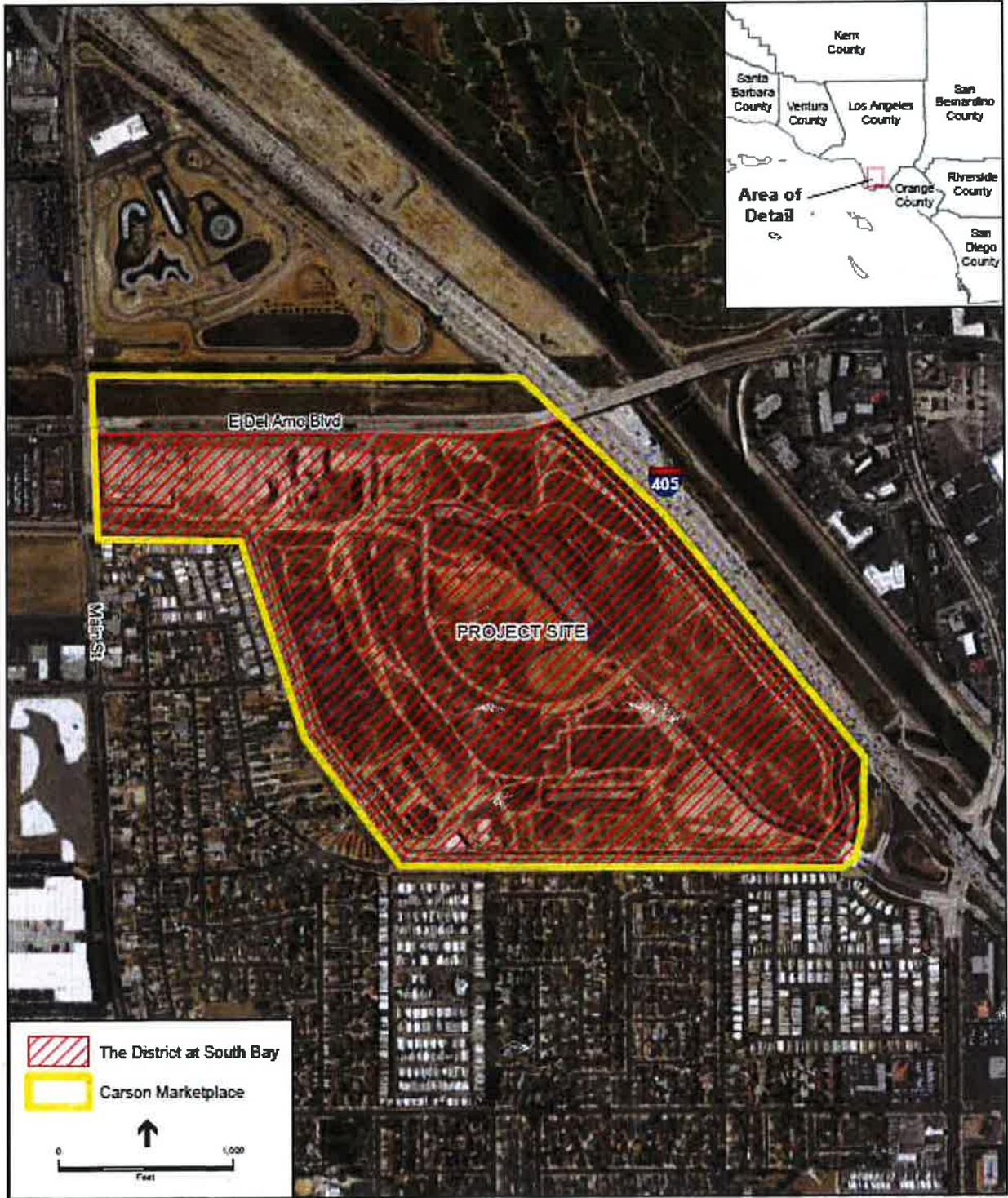
COMMENTING ON THE SCOPE OF THE SEIR: Consistent with CEQA Guidelines Section 15082(b), a responsible or trustee agency for the revised project can submit a response regarding the scope and content of the environmental information within the SEIR to the lead agency no later than 30 days after receipt of this Notice of Preparation. The review period is from **August 1, 2017 to August 31, 2017**. Please send your comments directly to:

City of Carson, Planning Department
Attn: Ethan Edwards, Planner
701 E Carson St, Carson, CA
Carson, California 90745
Email: eedwards@carson.ca.us
Fax: (310) 835-5749

DUE DATE FOR COMMENTS: August 31, 2017

PUBLIC SCOPING MEETING:

Pursuant to CEQA Guidelines Section 15082(c) and 15083, the Carson Reclamation Authority as the lead agency will be holding a public scoping meeting at 6:00 PM, August 23, 2017 at Carson Community Center Hall A, 801 E Carson St, Carson, CA. The public scoping meeting will provide an opportunity to receive and disseminate information, identify environmental issues, and discuss the scope of review to be included in the SEIR. The scoping meeting is not a public hearing, and no decisions on the proposed revised project will be made at this meeting. It is an opportunity for agencies and the general public to provide input on what issues should be addressed in the SEIR. All public agencies, organizations, and interested parties, including nearby residents and business owners, are encouraged to attend and participate in this meeting.



SOURCE: ESRI

The Boulevards . 160573.03

Figure 1
Project Vicinity



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

RECEIVED

AUG 28 2017

August 23, 2017
City of Carson
Planning Division

SENT VIA USPS AND E-MAIL:

eedwards@carson.ca.us

City of Carson, Planning Department

Attn: Ethan Edwards, Planner

701 E. Carson Street

Carson, California 90745

**Notice of Preparation of a Supplemental Environmental Impact Report for the
District at South Bay
(Formerly “Carson Marketplace” and/or “The Boulevards at South Bay”)**

South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. SCAQMD staff's comments are recommendations regarding the analysis of potential air quality impacts from the Proposed Revised Project that should be included in the Supplemental Environmental Impact Report (EIR). Please send SCAQMD a copy of the Supplemental EIR upon its completion. Note that copies of the Supplemental EIR that are submitted to the State Clearinghouse are not forwarded to SCAQMD. Please forward a copy of the Supplemental EIR directly to SCAQMD at the address in our letterhead. **In addition, please send with the Supplemental EIR all appendices or technical documents related to the air quality, health risk, and greenhouse gas analyses and electronic versions of all air quality modeling and health risk assessment files¹. These include emission calculation spreadsheets and modeling input and output files (not PDF files). Without all files and supporting documentation, SCAQMD staff will be unable to complete our review of the air quality analyses in a timely manner. Any delays in providing all supporting documentation will require additional time for review beyond the end of the comment period.**

Air Quality Analysis

SCAQMD adopted its California Environmental Quality Act (CEQA) Air Quality Handbook in 1993 to assist other public agencies with the preparation of air quality analyses. SCAQMD staff recommends that the Lead Agency use this Handbook as guidance when preparing its air quality analyses to analyze the incremental differences between the approved Project that was analyzed in the Final EIR which was certified in 2006 (SCH No.: 2005051059) and the Proposed Revised Project. Copies of the Handbook are available from SCAQMD's Subscription Services Department by calling (909) 396-3720. More guidance developed since this Handbook is also available on SCAQMD's website at: [http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-\(1993\)](http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-(1993)).

SCAQMD staff also recommends that the Lead Agency use the CalEEMod land use emissions software. This software has recently been updated to incorporate up-to-date state and locally approved emission factors and methodologies for estimating pollutant emissions from typical land use development. CalEEMod is the only software model maintained by the California Air Pollution Control Officers

¹ Pursuant to the CEQA Guidelines Section 15174, the information contained in an EIR shall include summarized technical data, maps, plot plans, diagrams, and similar relevant information sufficient to permit full assessment of significant environmental impacts by reviewing agencies and members of the public. Placement of highly technical and specialized analysis and data in the body of an EIR should be avoided through inclusion of supporting information and analyses as appendices to the main body of the EIR. Appendices to the EIR may be prepared in volumes separate from the basic EIR document, but shall be readily available for public examination and shall be submitted to all clearinghouses which assist in public review.

Association (CAPCOA) and replaces the now outdated URBEMIS. This model is available free of charge at: www.caleemod.com.

Adopted on March 3, 2017, the 2016 Air Quality Management Plan (2016 AQMP) is a regional blueprint for achieving air quality standards and healthful air in the South Coast Air Basin. Built upon the progress in implementing the 2007 and 2012 AQMPs, the 2016 AQMP provides a regional perspective on air quality including the challenge of achieving 45% additional NOx reductions in 2023 and 55% in 2031 that are needed for ozone attainment. The 2016 AQMP is available on SCAQMD's website at: <http://www.aqmd.gov/home/library/clean-air-plans/air-quality-mgt-plan>.

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 suggested 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. SCAQMD staff recommends that the Lead Agency review this Guidance Document as a tool when making local planning and land use decisions. This Guidance Document is available on SCAQMD's website at: <http://www.aqmd.gov/home/library/documents-support-material/planning-guidance/guidance-document>. Additional guidance on siting incompatible land uses (such as placing homes near freeways or other polluting sources) can be found in the California Air Resources Board's *Air Quality and Land Use Handbook: A Community Health Perspective*, which can be found at: <http://www.arb.ca.gov/ch/handbook.pdf>. Guidance² on strategies to reduce air pollution exposure near high-volume roadways can be found at: https://www.arb.ca.gov/ch/rd/technical_advisory_final.PDF.

SCAQMD has also developed both regional and localized significance thresholds. SCAQMD staff requests that the Lead Agency compare the emission results to the recommended regional significance thresholds found here: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf>. In addition to analyzing regional air quality impacts, SCAQMD staff recommends calculating localized air quality impacts and comparing the results to localized significance thresholds (LSTs). LSTs can be used in addition to the recommended regional significance thresholds as a second indication of air quality impacts when preparing a CEQA document. Therefore, when preparing the air quality analysis for the Proposed Revised Project, it is recommended that the Lead Agency perform a localized analysis by either using the LSTs developed by SCAQMD staff or performing dispersion modeling as necessary. Guidance for performing a localized air quality analysis can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>.

When specific development is reasonably foreseeable as result of the goals, policies, and guidelines in the Proposed Revised Project, the Lead Agency should identify any potential adverse air quality impacts and sources of air pollution that could occur using its best efforts to find out and a good-faith effort at full disclosure in the Supplemental EIR. The degree of specificity will correspond to the degree of specificity involved in the underlying activity which is described in the Supplemental EIR (CEQA Guidelines

² In April 2017, CARB published a technical advisory, *Strategies to Reduce Air Pollution Exposure Near High-Volume Roadways: Technical Advisory*, to supplement CARB's *Air Quality and Land Use Handbook: A Community Health Perspective*. This Technical Advisory is intended to provide information on strategies to reduce exposures to traffic emissions near high-volume roadways to assist land use planning and decision-making in order to protect public health and promote equity and environmental justice. Available at: <https://www.arb.ca.gov/ch/landuse.htm>.

Section 15146). When quantifying air quality emissions, emissions from both construction (including demolition, if any) and operations should be calculated. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips). Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality impacts from indirect sources, such as sources that generate or attract vehicular trips, should be included in the analysis. Furthermore, for phased projects where there will be an overlap between construction and operation, the air quality impacts from the overlapping construction and operation should be combined and compared to SCAQMD's regional operational thresholds to determine significance.

In the event that the Proposed Revised Project generates or attracts vehicular trips, especially heavy-duty diesel-fueled vehicles, it is recommended that the Lead Agency perform a mobile source health risk assessment. Guidance for performing a mobile source health risk assessment ("*Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis*") can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis>. An analysis of all toxic air contaminant impacts due to the use of equipment potentially generating such air pollutants should also be included.

Mitigation Measures

In the event that the Proposed Revised Project generates significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized during project construction and operation to minimize or eliminate these impacts. Pursuant to CEQA Guidelines Section 15126.4 (a)(1)(D), any impacts resulting from mitigation measures must also be discussed. Several resources are available to assist the Lead Agency with identifying possible mitigation measures for the Proposed Revised Project, including:

- Chapter 11 of SCAQMD's CEQA Air Quality Handbook
- SCAQMD's CEQA web pages available here: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mitigation-measures-and-control-efficiencies>.
- SCAQMD's Rule 403 – Fugitive Dust, and the Implementation Handbook for controlling construction-related emissions and Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities
- CAPCOA's *Quantifying Greenhouse Gas Mitigation Measures* available here: <http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>.

Alternatives

In the event that the Proposed Revised Project generates significant adverse air quality impacts, CEQA requires the consideration and discussion of alternatives to the project or its location which are capable of avoiding or substantially lessening any of the significant effects of the project. The discussion of a reasonable range of potentially feasible alternatives, including a "no project" alternative, is intended to foster informed decision-making and public participation. Pursuant to CEQA Guidelines Section 15126.6 (d), the Supplemental EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the Proposed Revised Project.

Permits

In the event that the Proposed Revised Project requires a permit from SCAQMD, SCAQMD should be identified as a Responsible Agency for the Proposed Revised Project in the Supplemental EIR. For more

information on permits, please visit SCAQMD 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.

Data Sources

SCAQMD rules and relevant air quality reports and data are available by calling SCAQMD's Public Information Center at (909) 396-2039. Much of the information available through the Public Information Center is also available via SCAQMD's webpage at: <http://www.aqmd.gov>.

SCAQMD staff is available to work with the Lead Agency to ensure that the Proposed Revised Project's incremental air quality impacts are accurately evaluated and mitigated where feasible. If you have any questions regarding this letter, please contact me at lsun@aqmd.gov or call me at (909) 396-3308.

Sincerely,

Lijin Sun

Lijin Sun, J.D.
Program Supervisor, CEQA IGR
Planning, Rule Development & Area Sources

LS
LAC170801-08
Control Number

August 30, 2017

To:

Carson City Council
701 E. Carson St.
Carson, CA. 90745

City Of Carson, Planning Department
Attn: Ethan Edwards, Planner
701 E. Carson St.
Carson, CA. 90745

Subject: District at South Bay

Dear City of Carson Representatives,

December 13, 2016 Planning Commission

I attended the December 13, 2016 Planning Commission meeting.

During the meeting the Planning Commission discussed how the residence of Carson were the unfortunate recipients of collateral damage due to significant noise and substantial vibrations caused by the previous construction attempt (i.e. District at South Bay).

The Developers appeared to minimize the previous resident damage caused by the construction. This response was expected because of the extremely poor handling of the public's concerns and lack of damage reparations.

Unless the plan has changed, the Developer will be driving 6500 large and long piles deep into the ground to support buildings over a 2 year period. The noise levels can reach very high decibel levels (i.e. 101). This decibel level over long periods can be damaging.

Public Impact

Links to potential hearing damage information due to noise.

Noise Risk Range (Db)	Description	Source
> 90		Johns Hopkins
>80		Mayo Clinic
>85		Kaiser Permanente

They also want to operate at these noise levels Monday - Saturday from 7am - 6pm. This includes the weekends, early mornings, and early evening. This does not allow much relief to residence.

Barbara Post (Planning Commission member) asked multiple questions and expressed deep concerns. She also voted no because this "variance" to the City noise ordinance required a more comprehensive response from the Developer in regards to noise and impact mitigation plans. She also witnessed the problem from the last construction effort. She also said the hours are too long. They should be 9am – 4pm and no excessive noise on Saturday. The Developer said that these concerns cannot be addressed until the "development plan" is complete. There were no guarantees provided.

Mike Mitoma has concerns about penalties for violations. There does not appear to be any that are documented. The City Attorney said that an injunction may be required to stop the construction. However, this is conjecture on his part and not documented in the plan. Even then the penalty is a misdemeanor. Basically there is no recourse against Developer violations since the city is the applicant for this variance. Therefore there appears to be no penalty for the Developer.

Another commissioner sitting to the far right also has concerns.

The Developer talked about monitoring. That does not address damages, violations, excessive noise, mitigation, and **Carson citizen reparation** plans.

It appears as though the City, County and State have not required the Developer to provide DOCUMENTED damage mitigation and reparation plans.

There are other residences that are aware of the past damaging issues surrounding the construction zone.

I also attended to August 23, 2017 review of the District at South Bay plan amendment. There were two representatives from ESA and Saed Nasseh (Mgr, Planning Division). I asked if the history of the previous project attempt would be reviewed in detailed in regards to the construction's negative impact to the Carson public. I am speaking of the:

- Airborne debris
- Damaging vibrations caused by the "deep dynamic impaction".
- Vibrations caused by driving the support piles.
- Significant noise caused by driving the support piles.

Business Impact

Please note that adherence to laws and policies will not assist the City's and Developer's reputation and support of the final product if the public feels they have been abused and ignored. Those that would be directly impacted would spread their dismay. Conversely, a positive and responsive experience by the public will be good for business and encouraging current and new business.

Comments On Previous Related Document

- The questions in the linked document (i.e. IV Responses To Written Comments) does not accompany solid, verifiable, documented damage remediation plans to repair damages.
<http://ci.carson.ca.us/content/files/pdfs/planning/IV.%20Responses%20to%20Written%20Comments.pdf>

- Final Environmental Impact Report
Section 9.5d is significantly incorrect. The history of the previous project proved damaging to residential homes surrounding the site. A solid, verifiable, documented damage remediation plans to repair damages is required before they begin for the sake of Carson residents.
- Section Responses 14-18; Responses 27-19
It states that the developer is held responsible for damages. However, there is no solid, verifiable, documented damage remediation plans to repair damages. This is required before they begin for the sake of Carson residents.
- The following submitted comments in regards to damage did not receive a solid, verifiable, documented damage remediation plans to repair damages before construction begins.
Commissioner Wilson
H.R. Norwood
Commissioner Saenz

<http://ci.carson.ca.us/content/files/pdfs/planning/Carson%20FEIR.pdf>

Requests

The last project caused damage to homes surrounding the constructions site. We need to eliminate a repeat of the issues, problems, damage, and angst of the Carson community.

- Please require the Developer submit a documented plan to address problems.
 - What is the process for residence report issues and damages?
 - What is the damage assessment process and timeframe?
 - What is the process to receive reparations / restitution and potential timeframes that can be based on various scenarios?
 - Will the above items be published before construction begins? If not then when?
 - What damages will be covered?
 - What damages will not be covered?
 - In what form will damages be compensated (e.g. cash)?
 - What single entity and person is responsible to interface for all activities from reporting to problem to tracking the problem to closure?
- Operate noisy and impactful construction Monday – Friday and not on the weekend.
- Given the fact that we have extremely creative and intelligent engineers and scientist, surely there is a solution to dramatically reducing:
 - Construct noise (e.g. sound absorbing barrier)
 - Vibrations
 - Airborne debris
 - Any other negative public impacts.

Questions

- What portions, parts and facets of the project have not been approved by what government agency?
- Will there be enough vibration over the construction period to cause gas meter, gas line, house water lines, water heaters, etc.
- How will vibrations from the construction be monitored?
- With what frequency and how will the reports be published to the public?
- Will a noise and privacy barrier be erected before construction begins?
- Will there be zero lighting impact to all Carson residents bordering the project? How will new lighting from signage, marquis, lamps etc. not be allowed to bleed into the residential neighborhoods?
- Will projected be prohibited from weekend and night constructions?
- What will be the highest decibel allowed?
- What is the equivalent Richter scale measurement used to quantify vibrations?
- Exactly how will the hazardous waste be removed?
- What types of “noise” will be allowed within the project?
- How will dust created by construction be minimized?
- What significant impacts are documented in the project’s evaluation?
- How will the animal (rodents, possums, reptiles, etc.) exodus from the site be eliminated before any construction begins?
- How will the noise and vibrations be mitigated from the pile driving?
- During the construction a large amount of particulate matter will be released into the air. How will you keep the citizens are safe?
- Is there any impact to the water quality? There should be no impact to something as essential to life as clean water.
- Will drilling, impaction, etc. cause poisons to be pushed into the ground water?
- How will the drainage systems handle the periodic heavy rain?
- Why will the contents of the dump not leach into the ground even after capping and impaction?
- How will the adjacent residence be safe from ANY landfill toxins or negative exposures of any kind?
- How will the toxins be monitored and repaired if there is a breach?
- What documentation is required for submitting a remediation request?
- Who makes the final decision on what is compensated and what is not compensated -- maybe an impartial panel?
- Request to make all policies for concerns (construction noise, vibrations, airborne debris, damage to homes) in writing before construction begins
- How often will the noise level be measured? Will the residents of Carson have access to the log to verify the noise levels during the entire construction process?
- How often will the vibration levels are measured. Will the residents of Carson have access to the log to verify the noise levels during the entire construction process
- Same with air quality-- how often will they be measured and will the results be published for Carson residents to review?

Thank you very much for being advocates to the citizens!

Rodney Warner
P.O. Box 5242
Carson, CA. 90749



COUNTY OF LOS ANGELES

FIRE DEPARTMENT

1320 NORTH EASTERN AVENUE
LOS ANGELES, CALIFORNIA 90063-3294

DARYL L. OSBY
FIRE CHIEF
FORESTER & FIRE WARDEN

August 31, 2017



Ethan Edwards, Planner
City of Carson
Planning Department
701 East Carson Street
Carson, CA 90745

Dear Mr. Edwards:

NOTICE OF PREPARATION OF A SUPPLEMENTAL ENVIRONMENTAL IMPACT REPORT, "THE DISTRICT AT SOUTH BAY," WOULD RETAIN THE WIDE RANGE OF LAND USES ADOPTED BY THE CITY, INCLUDING THE FOLLOWING USES: NEIGHBORHOOD COMMERCIAL, REGIONAL COMMERCIAL (INCLUDING OUTLET COMMERCIAL), COMMERCIAL RECREATION/ENTERTAINMENT, RESTAURANT, HOTEL, AND RESIDENTIAL, SOUTH BAY, CARSON, FFER 201700090

The Notice of Preparation of a Supplemental Environmental Impact Report 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 at this time.

LAND DEVELOPMENT UNIT:

1. The development of this project must comply with all applicable code and ordinance requirements for construction, access, water mains, fire flows, and fire hydrants.

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

AGOURA HILLS
ARTESIA
AZUSA
BALDWIN PARK
BELL
BELL GARDENS
BELLFLOWER

BRADBURY
CALABASAS
CARSON
CERRITOS
CLAREMONT
COMMERCE
COVINA

CUDAHY
DIAMOND BAR
DUARTE
EL MONTE
GARDENA
GLENORA
HAWAIIAN GARDENS

HAWTHORNE
HIDDEN HILLS
HUNTINGTON PARK
INDUSTRY
INGLEWOOD
IRWINDALE
LA CANADA-FLINTRIDGE

LA HABRA
LA MIRADA
LA PUENTE
LAKEWOOD
LANCASTER
LAWDALE
LOMITA

LYNWOOD
MALIBU
MAYWOOD
NORWALK
PALMDALE
PALOS VERDES ESTATES
PARAMOUNT

PICO RIVERA
POMONA
RANCHO PALOS VERDES
ROLLING HILLS
ROLLING HILLS ESTATES
ROSEMEAD
SAN DIMAS
SANTA CLARITA

SIGNAL HILL
SOUTH EL MONTE
SOUTH GATE
TEMPLE CITY
WALNUT
WEST HOLLYWOOD
WESTLAKE VILLAGE
WHITTIER

2. The statutory responsibilities of the County of Los Angeles Fire Department's Land Development Unit are the review of, and comment on, all projects within the unincorporated areas of the County of Los Angeles. Our emphasis is on the availability of sufficient water supplies for firefighting operations and local/regional access issues. However, we review all projects for issues that may have a significant impact on the County of Los Angeles Fire Department. We are responsible for the review of all projects within contract cities (cities that contract with the County of Los Angeles Fire Department for fire protection services). We are responsible for all County facilities located within non-contract cities. The County of Los Angeles Fire Department's Land Development Unit may also comment on conditions that may be imposed on a project by the Fire Prevention Division which may create a potentially significant impact to the environment.
3. Every building constructed shall be accessible to Fire Department apparatus by way of access roadways with an all-weather surface of not less than the prescribed width. The roadway shall be extended to within 150 feet of all portions of the exterior walls when measured by an unobstructed route around the exterior of the building.
4. When involved with subdivision in a city contracting fire protection with the County of Los Angeles Fire Department, Fire Department requirements for access, fire flows, and hydrants are addressed during the subdivision tentative map stage.
5. Fire sprinkler systems are required in some residential and most commercial occupancies. For those occupancies not requiring fire sprinkler systems it is strongly suggested that fire sprinkler systems be installed. This will reduce potential fire and life losses. Systems are now technically and economically feasible for residential use.
6. The development may require fire flows up to 4,000 gallons per minute at 20 pounds per square inch residual pressure for up to a five-hour duration. Final fire flows will be based on the size of buildings, its relationship to other structures, property lines, and types of construction used.
7. Fire hydrant spacing shall be 300 feet and shall meet the following requirements:
 - a) No portion of lot frontage shall be more than 200 feet via vehicular access from a public fire hydrant.

- b) No portion of a building shall exceed 400 feet via vehicular access from a properly spaced public fire hydrant.
 - c) Additional hydrants will be required if hydrant spacing exceeds specified distances.
 - d) When cul-de-sac depth exceeds 200 feet on a commercial street, hydrants shall be required at the corner and mid-block.
 - e) A cul-de-sac shall not be more than 500 feet in-length when serving land zoned for commercial use.
8. Turning radii shall not be less than 32 feet. This measurement shall be determined at the centerline of the road. A Fire Department approved turning area shall be provided for all driveways exceeding 150 feet in-length and at the end of all cul-de-sacs.
9. Provide a minimum unobstructed width of 28 feet exclusive of shoulders except for approved security gates in accordance with Section 503.6 and an unobstructed vertical clearance "clear o sky." Fire Department vehicular access to within 150 feet of all portions of the exterior walls of the first story of the building as measured by an approved route around the exterior of the building when the height of the building above the lowest level of the Fire Department vehicular access road is more than 30 feet high or the building is more than three stories. The access roadway shall be located a minimum of 15 feet and a maximum of 30 feet from the building and shall be positioned parallel to one entire side of the building. The side of the building on which the Aerial Fire apparatus access road is positioned shall be approved by the fire code official. Fire Code 503.1.1 and 503.2.2. Cross hatch the Fire Department vehicular access on the site plan and clearly depict the required width.
10. Driveway width for non-residential developments shall be increased when any of the following conditions will exist:
- a) Provide 34 feet in-width when parallel parking is allowed on one side of the access roadway/driveway. Preference is that such parking is not adjacent to the structure.
 - b) Provide 42 feet in-width when parallel parking is allowed on each side of the access roadway/driveway.

- c) Any access way less than 34 feet in-width shall be labeled "Fire Lane" on the final recording map and final building plans.
 - d) For streets or driveways with parking restrictions: The entrance to the street/driveway and intermittent spacing distances of 150 feet shall be posted with Fire Department approved signs stating "NO PARKING - FIRE LANE" in three-inch high letters. Driveway labeling is necessary to ensure access for Fire Department use.
11. All access devices and gates shall meet the following requirements:
- a) Any single-gated opening used for ingress and egress shall be a minimum of 26 feet in-width clear-to-sky.
 - b) Any divided gate opening (when each gate is used for a single direction of travel i.e., ingress or egress) shall be a minimum width of 20 feet clear-to-sky.
 - c) Gates and/or control devices shall be positioned a minimum of 50 feet from a public right-of-way and shall be provided with a turnaround having a minimum of 32 feet of turning radius. If an intercom system is used the 50 feet shall be measured from the right-of-way to the intercom control device.
 - d) All limited access devices shall be of a type approved by the Fire Department.
 - e) Gate plans shall be submitted to the Fire Department prior to installation. These plans shall show all locations, widths, and details of the proposed gates.
12. All proposals for traffic calming measures (speed humps/bumps/cushions, traffic circles, roundabouts, etc.) shall be submitted to the Fire Department for review prior to implementation.
13. Provide three sets of alternate route (detour) plans with a tentative schedule of planned closures prior to the beginning of construction. Complete architectural/structural plans are not necessary.

14. Temporary bridges shall be designed, constructed, and maintained to support a live load of at least 70,000 pounds. A minimum vertical clearance of 13' 6' will be required throughout construction.

15. Disruptions to water service shall be coordinated with the County of Los Angeles Fire Department and alternate water sources shall be provided for fire protection during such disruptions.

Notify the County of Los Angeles Fire Department's Battalion Headquarters, Fire Station 10(BN HQ), 1860 E. Del Amo, Carson 90746-2940, (310) 632-8230 at least three days in advance of any street closures that may affect Fire/Paramedic responses in the area.

The County of Los Angeles Fire Department Land Development Unit's comments are general requirements. Specific fire and life safety requirements and conditions set during the environmental review process will be addressed and conditions set at the building and fire plan check phase. Once the official plans are submitted for review there may be additional requirements.

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.

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 or Fire Zone 4, archeological and cultural resources, and the County Oak Tree Ordinance. Potential impacts in these areas should be addressed.

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

Ethan Edwards, Planner
August 31, 2017
Page 6

HEALTH HAZARDOUS MATERIALS DIVISION:

The Health Hazardous Materials Division of the Los Angeles County Fire Department has no requirements for the project at this time. The Cal-EPA Department of Toxic Substances Control is the designated environmental oversight agency for the project.

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

Very truly yours,

A handwritten signature in blue ink, appearing to read "Michael Y. Takeshita", with a long horizontal flourish extending to the right.

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

MYT:ac



OFFICE OF THE SHERIFF



COUNTY OF LOS ANGELES

HALL OF JUSTICE

JIM McDONNELL, SHERIFF

(310) 830-1123

September 5, 2017

Mr. Saied Naaseh
City of Carson Planning Manager
701 East Carson Street
Carson, California 90745

Dear Mr. Naaseh:

Pursuant to our conversation last week, we conducted a review of the proposed site plans for The District at South Bay project. As a result, we recommend the following staffing, infrastructure, and other items:

Staffing

One 70 hour, non-relief car.

- This will allow for one deputy at the location, ten hours per day, seven days per week. The cost for this item under the current cost model is \$545,752.00.

One 40 hour, non-relief car.

- This will allow for one additional deputy at the location, ten hours per day, on what we anticipate will be the busier days of Thursday – Sunday. The cost for this item under the current cost model is \$283,507.00.

A contingency fund of \$75,000.00.

- This fund will be used to hire additional deputies on overtime when the need for additional staffing can be anticipated (holidays, special events, etc.)

211 WEST TEMPLE STREET, LOS ANGELES, CALIFORNIA 90012

A Tradition of Service
— Since 1850 —

Infrastructure and Other Items

Office space for Sheriff's Department personnel to include:

- A lobby/reception area for the public with suitable counter
- Four computer work stations
- A LiveScan fingerprint station
- A Unisex restroom(s)
- A kitchenette with a sink and space for a refrigerator and microwave
- The necessary wiring to support the required computers/electronics

This office space should be conjoined with the facility security office with walk-through access to same. This will facilitate communication and the sharing of space, resources, and Sheriff's Department personnel's access to the monitors of the facility security cameras during emergencies and other identified times of need.

An added benefit of a comfortable, well-equipped space is that it will likely draw additional, unassigned Sheriff's Department personnel to the location resulting in an increased law enforcement presence without additional costs.

A community center with a seating capacity of 40 persons and the necessary furniture to accommodate meetings (tables, chairs, etc.). This facility would be used to accommodate community gatherings and for hosting law enforcement training. This area will also serve as a potential unified command post for law enforcement and fire agencies in the event there is a need for any type of large emergency services response, such as a fire.

Four computers of the type to be designated by the Sheriff's Department

Six parking spaces designated for sheriff's department personnel only.

- Four spaces at the sheriff's department office space
- One space at each end of the facility

Two "T3" Patroller, law enforcement equipped, Segway-type vehicles for use by sheriff's department personnel on the facility, along with secure storage/charging area for same.

Automated License Plate Reader (ALPR) cameras to be installed at each entrance to the facility. Where there are multiple lanes at an entrance, each lane will have a separate ALPR camera.

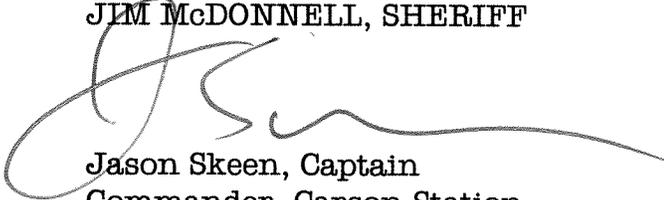
Facility security cameras to be routed to "LexRay" servers to allow viewing at Carson Sheriff's Station and the Department's Emergency Operations Bureau.

Although we have tried to anticipate our needs for the facility as accurately as possible, it is important to keep in mind the above recommendations are estimations only and based largely on preliminary and/or incomplete information. As plans for the physical design of the facility and its planned usage mature, our recommendations may require adjustment to accommodate.

If you have any questions regarding our recommendations, or would like to discuss them further, please feel free to contact Lieutenant Bill Evans or me at (310) 830-1123.

Sincerely,

JIM McDONNELL, SHERIFF

A handwritten signature in black ink, appearing to read "Jason Skeen", with a long horizontal flourish extending to the right.

Jason Skeen, Captain
Commander, Carson Station

