



VOLUME II

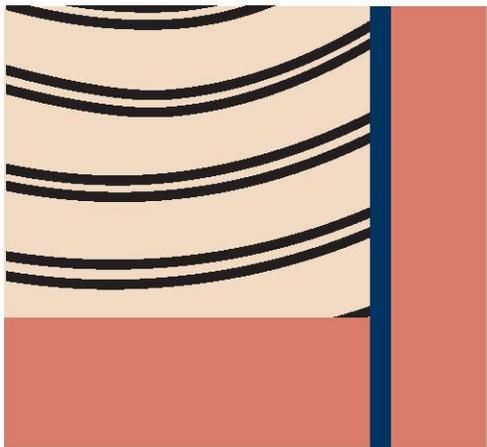
FINAL SUPPLEMENTAL ENVIRONMENTAL IMPACT REPORT

THE DISTRICT AT SOUTH BAY SPECIFIC PLAN AMENDMENT



SCH No. 2005051059

APRIL 2022



VOLUME II

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THE DISTRICT AT SOUTH BAY SPECIFIC PLAN AMENDMENT

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I. INTRODUCTION TO THE 2022 FINAL SEIR

I.A CONTENTS AND PURPOSE OF THE 2022 FINAL SEIR

This document (2022 Final Supplemental Environmental Impact Report [SEIR]) provides the following:

- Responses to environmental comments received on the 2021 Draft Supplemental Environmental Impact Report (2021 Draft SEIR) during the public review period, which began on October 29, 2021, and concluded on December 13, 2021 (CEQA Guidelines Section 15088(a)(b)(c));
- Incorporates any additions or revisions to the 2021 Draft SEIR necessary to clarify or supplement information contained therein (CEQA Guidelines Section 15088(d)); and
- Includes a Mitigation Monitoring and Reporting Program (MMRP) that identifies enforcement and monitoring agencies responsible for the implementation of the mitigation measures identified in the 2021 Draft SEIR (CEQA Guidelines Section 15097).

Therefore, the 2021 Draft SEIR and the 2022 Final SEIR are together referred to as the 2022 SEIR. As required by CEQA Guidelines Section 15132, the 2022 Final SEIR includes: (1) the Draft EIR (in Volume I); (2) comments received on the 2021 Draft SEIR (in Volume II); (3) responses of the Lead Agency (i.e., the City of Carson) to significant environmental comments raised by the commenters (in Volume II); and (4) a list of persons, organizations, and public agencies commenting on the 2021 Draft SEIR (in Volume II). In addition, Volume II includes corrections and additions to the 2021 Draft SEIR and the MMRP.

Pursuant to CEQA Guidelines Section 15090, the Lead Agency is required to certify that the 2022 SEIR (comprised of the 2021 Draft SEIR and the 2022 Final SEIR) has been completed in accordance with CEQA; that the information presented in the 2022 SEIR has been presented to, reviewed by, and considered by the Lead Agency's decision-making body prior to consideration of approval of the project; and it reflects the Lead Agency's independent judgment and analysis.

I.B FORMAT OF THE FINAL SEIR

This 2022 Final SEIR consists of the following four chapters:

- I. **Introduction to the 2022 Final SEIR.** This chapter includes a brief introduction of the content and purpose of the 2022 Final SEIR, the public review process, a summary of the environmental impacts of the 2021 Project as analyzed in the 2021 Draft SEIR, and a comparison of the impacts of the 2021 Project to the impact determinations for the 2018 Project contained in the certified 2018 Final SEIR.

- II. **Mitigation Monitoring and Reporting Program.** The MMRP presented in this chapter sets forth the mitigation measures imposed by the Lead Agency for implementation of the 2021 Project and takes into account all the revisions resulting from agency and public comments on the 2021 Draft SEIR or as voluntarily initiated by the Lead Agency. The MMRP identifies the mitigation measure and to which planning area it applies; the timing of implementation; the implementing party; the entity responsible for enforcement; and the responsible monitoring agency. Mitigation measures are listed by environmental topic.
- III. **Additions and Corrections to the 2021 Draft SEIR.** This chapter sets forth the corrections and clarifications made to the 2021 Draft SEIR based on comments received from the responding agencies and public, or as voluntarily initiated by the Lead Agency.
- IV. **Response to Written Comments.** This chapter presents all comments received by the Lead Agency during the 2021 Draft SEIR’s 45-day public review period, as well as the Lead Agency’s responses to significant environmental comments raised.

I.C PUBLIC REVIEW PROCESS

The City of Carson circulated an NOP for the 2021 Project on April 16, 2021, concluding on May 17, 2021. During the 30-day comment period, a total of seven comment letters were received by six agencies and one group, including: (1) Native American Heritage Commission (NAHC); (2) Los Angeles County Sanitation Districts (Sanitation Districts); (3) South Coast Air Quality Management District (SCAQMD); (4) California Department of Fish and Wildlife (CDFW); (5) California Department of Transportation (Caltrans); (6) California Air Resources Board (CARB); and (7) Southwest Regional Council of Carpenters. In addition, a public scoping meeting was held on April 29, 2021, which was attended by members of the public; no comments were received during the public scoping meeting. The NOP and comment letters received during the NOP comment period are included in Appendix A of the 2021 Draft SEIR.

The 2021 Draft SEIR was provided to the State Clearinghouse and in compliance with CEQA, was circulated for a 45-day review period beginning on October 29, 2021, and concluding on December 13, 2021.¹ A total 7 comment letters were received by five agencies and two groups, including: (1) Los Angeles County Fire Department (LACoFD); (2) Caltrans; (3) SCAQMD; (4) CDFW; (5) Gabrieleno Band of Mission Indians – Kizh Nation; and (6) Latham and Watkins on behalf of CAM-Carson LLC.

Following the public review period, written responses have been prepared for all significant environmental comments received, and these comments and responses have been incorporated into this 2022 Final SEIR. No final actions (e.g., approval or denial) will be taken on the 2021 Project until the 2022 Final SEIR has been reviewed by and considered by the Lead Agency’s decision-

¹ *Public Resources Code Section 21091.*

making body, determined to be completed in accordance with CEQA, and concluded that it reflects the Lead Agency's independent judgment and analysis. Dates of public hearings related to the environmental review and approval process have been and will be published and officially noticed in accordance with all legal requirements.

I.D ENVIRONMENTAL IMPACTS COMPARISON BETWEEN THE PREVIOUS SEIRS AND THE 2022 SEIR

The 2021 Draft SEIR was prepared to augment and supplement the environmental analysis previously provided in the following documents: (i) the previously certified 2006 Final EIR (2006 FEIR) for a project development located on the former Cal Compact Landfill Site in the City of Carson (also known and referred to as the 157-Acre Site), along with a separate 11-acre site located north of Del Amo Boulevard (which was not formerly part of the Cal Compact Landfill, but has been developed with the Evolve South Bay apartment complex) pursuant to the Carson Marketplace Specific Plan approved by the City Council of the City of Carson (City) in 2006; (ii) an Addendum to the 2006 FEIR adopted by the City in 2009 to address changes in the remediation activities at the 157-Acre Site; and (iii) the previously certified 2018 Supplemental Final EIR (2018 SEIR) for a revised project proposal for the 157-Acre Site (the 2018 Project), which included a revision and re-naming of the Carson Marketplace Specific Plan adopted for the 157-Acre Site as the District at South Bay Specific Plan (the 2018 Specific Plan). This 2022 SEIR has been prepared to evaluate the 2021 Project as compared to the previously approved 2018 Project (and if applicable, the 2006 Project) to determine whether the 2021 Project would result in new significant environmental effects or a substantial increase in the severity of previously identified significant environment effects as compared to the projects evaluated in either the 2006 FEIR and/or the 2018 SEIR. **Table I-1, Environmental Impacts Comparison Chart**, provides a summary of environmental impacts associated with the 2021 Project and a comparison to the impact determinations contained in the certified 2006 FEIR and/or the certified 2018 SEIR. The majority of the 2021 Project's environmental impacts are described in Table I-1 as "similar" to the impacts of the 2018 Project. A "similar" designation indicates that although the impacts disclosed by the 2022 SEIR may be slightly greater or slightly reduced from the impacts disclosed in the 2018 SEIR, as such impacts would result in the same conclusions under both the 2022 SEIR and the 2018 SEIR (i.e., less than significant, less than significant with mitigation, or significant and unavoidable).

**Table I-1
Environmental Impacts Comparison Chart**

Environmental Topic	Significant and Unavoidable	Not Significant with Mitigation	Less than Significant	Comparison to 2018 SEIR
Aesthetics – Scenic Vista			X	Similar
Aesthetics – Scenic Resources			X	Similar
Aesthetics – Scenic Quality – Construction	X			Similar
Aesthetics – Scenic Quality – Operation			X	Similar
Aesthetics – Light and Glare			X	Similar
Agriculture and Forestry			X	Similar
Air Quality – Construction		X		Reduced
Air Quality – Operations	X			Similar
Biological Resources			X	Similar
Cultural Resources			X	Similar
Energy			X	Similar
Geology and Soils		X		Similar
Greenhouse Gas Emissions			X	Similar
Hazards and Hazardous Materials		X		Similar
Hydrology and Water Quality			X	Similar
Land Use and Planning			X	Similar
Mineral Resources			X	Similar
Noise – Construction (Project-Level and Cumulative)	X			Similar
Noise – Operation (Project-Level)		X		Similar
Noise – Operations (Cumulative)	X			Different and Greater
Population and Housing			X	Similar
Public Services – Fire Protection		X		Similar
Public Services – Police Protection		X		Similar
Public Services – Schools			X	Similar
Public Services – Parks			X	Similar
Public Services – Libraries			X	Similar
Recreation			X	Similar

**Table I-1
Environmental Impacts Comparison Chart**

Environmental Topic	Significant and Unavoidable	Not Significant with Mitigation	Less than Significant	Comparison to 2018 SEIR
Transportation – Circulation System			X	Not applicable; not considered in 2018 SEIR
Transportation – VMT	X			Not applicable; not considered in 2018 SEIR
Transportation – Increase Hazards			X	Similar
Transportation – Emergency Access			X	Similar
Utilities – Water		X		Similar
Utilities – Wastewater		X		Similar
Utilities – Solid Waste		X		Similar
Wildfire			X	Not applicable; not considered in 2018 SEIR

As indicated in Table I-1, the 2022 SEIR discloses new significant impacts associated with the 2021 Project with respect to significant and unavoidable cumulative operational roadway noise. Specifically, significant unavoidable impacts would occur under the Future Plus Project scenario in 2024, 2025, and 2026 at three roadway segments: Main Street between Lenardo Drive and Torrance Boulevard; Del Amo Boulevard between Main Street and Stamps Drive; and Lenardo Drive between I-405 Freeway southbound ramp and Avalon Boulevard).

In addition, the 2021 Project would result in an impact reduction in comparison to the 2018 Project with respect to regional construction emissions. Specifically, under the 2018 SEIR, impacts related to regional construction emissions for volatile organic compounds (VOCs) and carbon monoxide (CO) were found to be significant and unavoidable. However, the 2022 SEIR found these impacts to be less than significant with mitigation.

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II. MITIGATION MONITORING AND REPORTING PROGRAM

This Mitigation Monitoring and Reporting Program (MMRP) has been prepared in accordance with Public Resources Code Section 21081.6 and CEQA Guidelines Section 15091(d), which require a public agency to adopt a program for monitoring or reporting on the changes it has required in the project or conditions of approval to substantially lessen significant environmental effects. Specifically, Public Resources Code Section 21081.6 states: "... the [lead] agency shall adopt a reporting or monitoring program for the changes made to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment ... The ... program ... shall be designed to ensure compliance during project implementation." The City of Carson, specifically the Planning Division of the Community Development Department, is the Lead Agency for the 2021 Project.

The intent of the MMRP is to (1) verify satisfaction of the required mitigation measures of the MMRP; (2) provide a methodology to document implementation of the required mitigation; (3) provide a record of the Monitoring Program; (4) identify monitoring responsibility; and (5) establish administrative procedures for the clearance of mitigation measures.

The MMRP, which is provided by **Table II-1**, lists each mitigation measure and project design feature (PDF) contained in the 2021 Draft SEIR organized by topic (e.g., aesthetics, air quality, biological resources). Mitigation measures are listed first, with PDFs, which will carry the same implementation and enforceability requirements as mitigation measures, following the mitigation measures. In some cases, a 2018 mitigation measure is now included as a 2021 PDF due to compliance with current regulatory requirements, and that makes them part of the unmitigated modeling scenario, in which case it is noted as such in Table II-1.

For each mitigation measure and PDF, Table II-1 also provides the following:

- The planning area to which the mitigation measure or PDF applies;
- The phase of the 2021 Project during which the mitigation measure or PDF would be monitored (i.e., prior to issuance of a building permit, construction, or occupancy);
- The entity responsible for implementation;
- The enforcement agency (i.e., the agency with the authority to enforce the mitigation measure or PDF);
- The responsible monitoring agency (i.e., the agency to which reports involving feasibility, compliance, and implementation would be submitted); and

- A series of columns that will allow written verify of implementation of the mitigation measure or PDF.

The “Implementing Party means the party or parties responsible for implementing the mitigation measure, which may include the City, the Carson Reclamation Authority (CRA), or the applicable Applicant(s). Where the term “Applicant(s) Horizontal” is used in the MMRP, it refers to the entity responsible for construction, operation, and/or maintenance, as applicable, of the horizontal infrastructure improvements, including, for example, structural slab/foundations, piles and pile caps, underground/under-slab utilities or other infrastructure. Where the term “Applicant(s) Vertical” or is used, it refers to the developer or entity responsible for construction, operation, and/or maintenance of any above-grade or at-grade (vertical) improvements, including, for example, signage and lighting improvements, open space improvements, and buildings. In the case of building protection systems, they include both horizontal and vertical components and, as such, the Implementing Party is both “Applicant(s) Horizontal” and “Applicant(s) Vertical.”

Under the heading “Enforcement Agency” in the table below, the City of Carson Department of Community Development, Planning Division refers to the Director or his/her designee.

With respect to PA2, CAM-Carson LLC has vested rights to a project proposal that was approved for development by the City (following certification of the 2018 Final SEIR) pursuant to a Development Agreement between the City and CAM-Carson LLC, dated September 6, 2018; therefore, if CAM-Carson LLC pursues its project proposal, the compliance requirements for PA2 would be limited to those mitigation measures that were identified in the certified 2018 Final SEIR.

**Table II-1
Mitigation Monitoring and Reporting Program**

Mitigation Measures	Applicable to				Monitoring Phase	Implementing Party	Enforcement Agency	Responsible Monitoring Agency	Verification of Compliance		
	PA1	PA2	PA3	City of Carson					Initials	Date	Remarks
I. Aesthetics											
Mitigation Measure B-1: The buildings in PA3 at the western boundary of the Project Site (i.e., Buildings A and D) shall maintain a 70-foot setback from the property line adjacent to the Torrance Lateral. The minimum setback for all buildings greater than 60 feet in height along the Torrance Lateral, adjacent to residential uses, shall be 250 feet.			•		Prior to issuance of a building permit/Pre-Construction	Applicant(s) Vertical	City of Carson Department of Community Development, Planning Division	City of Carson Department of Community Development, Planning Division			
Mitigation Measure B-2: The distribution, placement, and orientation of signs along the I-405 Freeway shall be in substantial compliance with the signage concepts and in compliance with the sign standards in the 2021 Specific Plan Amendment.		•	•	•	Prior to issuance of a building permit for PA2 (for building/wall mounted signage During administrative review for freeway pylon signs	Applicant(s) Vertical; and City, CRA, and applicable sign owner (for freeway pylon signs)	City of Carson Department of Community Development, Planning Division	City of Carson Department of Community Development, Planning Division			

**Table II-1
Mitigation Monitoring and Reporting Program**

Mitigation Measures	Applicable to				Monitoring Phase	Implementing Party	Enforcement Agency	Responsible Monitoring Agency	Verification of Compliance		
	PA1	PA2	PA3	City of Carson					Initials	Date	Remarks
Mitigation Measure B-3a: If any portion of the illuminated surface of the sign is visible from a residential use within 1,000 feet of said sign at night, then the proposed modified Project sign luminance shall be reduced to less than 300 cd/m ² at night.	•	•	•	•	Prior to issuance of a building permit for PA1, PA2, and PA3 During administrative review for freeway pylon signs	Applicant(s) Vertical; City, CRA, and applicable sign owner (for freeway pylon signs)	City of Carson Department of Community Development, Planning Division	City of Carson Department of Community Development, Planning Division			
Mitigation Measure B-3b: If any portion of the illuminated surface of the sign is visible from a residential use within 1,000 feet of said sign, sign area and/or sign luminance shall be limited so that the light trespass illuminance is less than 0.74 foot-candle at said residential property line.	•	•	•	•	Prior to issuance of a building permit for PA1, PA2, and PA3 During administrative review for freeway pylon signs	Applicant(s) Vertical; City, CRA, and applicable sign owner (for freeway pylon signs)	City of Carson Department of Community Development, Planning Division	City of Carson Department of Community Development, Planning Division			
Mitigation Measure B-4: All Project development shall undergo site plan review by the Community Development Director (or a designee) to ensure that the following design measures have been implemented: <ul style="list-style-type: none">• Landscaping. All Landscaping shall be consistent with a plant palette of native trees, shrubs, and groundcovers that shall add uniformity to the Project Site. Plants shall be selected to support and	•	•	•		Prior to issuance of a building permit/Pre-Construction	Applicant(s) Vertical	City of Carson Department of Community Development, Planning Division	City of Carson Department of Community Development, Planning Division			

**Table II-1
Mitigation Monitoring and Reporting Program**

Mitigation Measures	Applicable to				Monitoring Phase	Implementing Party	Enforcement Agency	Responsible Monitoring Agency	Verification of Compliance		
	PA1	PA2	PA3	City of Carson					Initials	Date	Remarks
<p>complement the themes of the various Project components. Specially themed landscaping treatments shall occur at key locations (e.g., freeway edge and channel slope). Of more detailed note: (1) continuous shrub and ground cover plantings shall be provided in the medians and edges of internal streets with vertical landscape and/or sculptural hardscape elements on average every 50 feet along the edges; (2) a minimum of 5% landscape coverage shall be provided in parking lots, including landscaping adjacent to edges of parking fields; and (3) 50% landscape coverage of visible concrete surfaces shall be provided on the edges of parking structures adjacent and visible to residences, not inclusive of commercial over podium.</p> <ul style="list-style-type: none"> ● Buildings. Buildings shall include the following design features: varied and articulated building façades, with a variety of architectural accent materials for exterior treatment at visually accessible locations. ● Accessory Facilities and Walls. Wall facades shall be varied and articulated. Accessory facilities such as trash bins, storage areas, etc., shall be covered and screened as set forth in the 2021 Specific Plan Amendment. ● Lighting. Lighting shall be limited in intensity, light control methods, and pole heights, so as to be directed on site, and not interfere with off-site activities. ● Signage. A comprehensive sign program shall be prepared for each Planning Area that provides the 											

**Table II-1
Mitigation Monitoring and Reporting Program**

Mitigation Measures	Applicable to				Monitoring Phase	Implementing Party	Enforcement Agency	Responsible Monitoring Agency	Verification of Compliance		
	PA1	PA2	PA3	City of Carson					Initials	Date	Remarks
final design, size, location, and illuminance of signage within a Planning Area. As part of the application submittal for the comprehensive sign program, if necessary, a technical lighting study shall be prepared to ensure that the proposed signs comply with Mitigation Measures B-3a and B-3b regarding illuminance, and that no spillover or adverse effects to adjacent residential uses shall occur.											
2021 SEIR PDF-A1: Sign lighting luminance shall not exceed 500 candelas per square meter (cd/m ²) at night from 45 minutes after sunset until 45 minutes prior to sunrise, and 10,000 cd/m ² during day-time hours from 45 minutes after sunrise until 45 minutes prior to sunset.	•	•	•		Prior to issuance of a building permit/Pre-Construction; Prior to the issuance of the first occupancy permit/Post-Construction	Applicant(s) Vertical	City of Carson Department of Community Development, Planning Division	City of Carson Department of Community Development, Planning Division			
2021 SEIR PDF-A2: Sign lighting where sign illumination has the potential to exceed 500 cd/m ² will include an electronic control mechanism to reduce sign luminance to 500 cd/m ² at any time when ambient sunlight is less than 100 foot-candles (fc).	•	•	•		Prior to issuance of a building permit/Pre-Construction; Prior to issuance of a certificate of occupancy	Applicant(s) Vertical	City of Carson Department of Community Development, Planning Division	City of Carson Department of Community Development, Planning Division			

**Table II-1
Mitigation Monitoring and Reporting Program**

Mitigation Measures	Applicable to				Monitoring Phase	Implementing Party	Enforcement Agency	Responsible Monitoring Agency	Verification of Compliance		
	PA1	PA2	PA3	City of Carson					Initials	Date	Remarks
2021 SEIR PDF-A3: Sign owners and/or Applicants shall submit documentation for the City’s review and approval verifying the luminance of applicable signage and confirm that the electronic control mechanism is functioning so as to achieve the necessary transition of luminance as required by 2021 SEIR PDF-A1 and PDF-A2 on an annual basis, or as otherwise required by the Community Development Director (or a designee). If the City determines based on the review of the documentation that adjustments are necessary, the sign owners and/or Applicants responsible for the signage shall make the adjustments to the satisfaction of the City.	•	•	•		Prior to issuance of a building permit/Pre-Construction	Sign owner and/or Applicant(s) Vertical	City of Carson Department of Community Development, Planning Division	City of Carson Department of Community Development, Planning Division			
2021 SEIR PDF-A4: On PA3, vegetation and tree canopy along project perimeter near offsite residents adjacent to project area shall be improved and maintained. Trees should be selected by a registered arborist as appropriate for the location. Tree canopy coverage along the perimeter shall have a width of at least 20 feet with continuous unbroken coverage within 5 years subject to any limitations posed by the underlying geotechnical conditions or the specimen requirements, or other limitations, in the Specific Plan.			•		At plan check/Pre-construction; Prior to issuance of a certificate of occupancy for PA3(a)/ Post-Construction	Applicant(s) Vertical	City of Carson Department of Community Development, Planning Division	City of Carson Department of Community Development, Planning Division			
III. Air Quality											
Mitigation Measure G-1: SCAQMD Rule 403 requirements are regulations that are part of the unmitigated modeling scenario; therefore, this mitigation measure is now 2021 SEIR PDF-C3. A placeholder for this mitigation measure is provided here to maintain consistent numbering of the mitigation measures.	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

**Table II-1
Mitigation Monitoring and Reporting Program**

Mitigation Measures	Applicable to				Monitoring Phase	Implementing Party	Enforcement Agency	Responsible Monitoring Agency	Verification of Compliance		
	PA1	PA2	PA3	City of Carson					Initials	Date	Remarks
Mitigation Measure G-2: All construction equipment shall be properly tuned and maintained in accordance with manufacturer’s specifications. Maintenance records and data sheets, including design specifications and emissions control tier classification shall be maintained on site and furnished to the lead agency or regulatory agencies upon request. (Applicable to PA1, PA2, and PA3.)	•	•	•		Prior to the issuance of a grading permit/ Construction	Applicant(s) Horizontal and Applicant(s) Vertical, as applicable	SCAQMD, City of Carson Department of Community Development, Building and Safety Division	City of Carson Department of Community Development, Building and Safety Division			
Mitigation Measure G-3: General contractors shall maintain and operate construction equipment so as to minimize exhaust emissions. During construction, trucks and vehicles in loading and unloading queues would turn their engines off, when not in use, to reduce vehicle emissions. Construction emissions should be phased and scheduled to avoid emissions peaks and discontinued during second-stage smog alerts.	•	•	•		Prior to the issuance of a grading permit/ Construction	Applicant(s) Horizontal and Applicant(s) Vertical, as applicable	SCAQMD	City of Carson Department of Community Development, Building and Safety Division			
Mitigation Measure G-4: This measure was replaced by 2021 SEIR PDF-C4 as it is a quantified part of the unmitigated modeling scenario. A placeholder for this mitigation measure is provided here to maintain consistent numbering of the mitigation measures.	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Mitigation Measure G-5: This measure was replaced by 2021 SEIR PDF-C5 as it is a quantified part of the unmitigated modeling scenario. A placeholder for this mitigation measure is provided here to maintain consistent numbering of the mitigation measures.	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

**Table II-1
Mitigation Monitoring and Reporting Program**

Mitigation Measures	Applicable to				Monitoring Phase	Implementing Party	Enforcement Agency	Responsible Monitoring Agency	Verification of Compliance		
	PA1	PA2	PA3	City of Carson					Initials	Date	Remarks
Mitigation Measure G-6: This measure was replaced by 2021 SEIR PDF-C1 requiring some Tier 4 and zero-emissions construction equipment. A placeholder for this mitigation measure is provided here to maintain consistent numbering of the mitigation measures.	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Mitigation Measure G-7: To reduce VOC emissions associated with construction activities, painting within each of the Planning Areas would not overlap and would also use low-VOC paints pursuant to SCAQMD Rule 1113. (Applicable to PA1, PA2, and PA3.)	•	•	•		Prior to the issuance of a grading permit/ Construction	Applicant(s) Horizontal and Applicant(s) Vertical, as applicable	SCAQMD	City of Carson Department of Community Development, Building and Safety Division			
Mitigation Measure G-8: Each Applicant shall comply with SCAQMD Rule 402 to reduce potential nuisance impacts due to odors from construction activities. (Applicable to PA1, PA2, and PA3.)	•	•	•		Prior to the issuance of a grading permit/ Construction	Applicant(s) Horizontal and Applicant(s) Vertical, as applicable	SCAQMD	City of Carson Department of Community Development, Building and Safety Division			
Mitigation Measure G-9: All construction vehicle tires shall be washed at the time these vehicles exit the Project Site, or use vehicle tracking pad per approved SWPPP. (Applicable to PA1, PA2, and PA3.)	•	•	•		Prior to the issuance of a grading permit/ Construction	Applicant(s) Horizontal and Applicant(s) Vertical, as applicable	SCAQMD	City of Carson Department of Community Development, Building and Safety Division			
Mitigation Measure G-10: All fill material carried by haul trucks shall be covered by a tarp or other means.	•	•	•		Prior to the issuance of a grading permit/ Construction	Applicant(s) Horizontal and Applicant(s) Vertical, as applicable	SCAQMD	City of Carson Department of Community Development, Building and Safety Division			

**Table II-1
Mitigation Monitoring and Reporting Program**

Mitigation Measures	Applicable to				Monitoring Phase	Implementing Party	Enforcement Agency	Responsible Monitoring Agency	Verification of Compliance		
	PA1	PA2	PA3	City of Carson					Initials	Date	Remarks
Mitigation Measure G-11: Any intensive dust-generating activity such as grinding concrete shall be controlled to the greatest extent feasible. (Applicable to PA1, PA2, and PA3.)	•	•	•		Prior to the issuance of a grading permit/ Construction	Applicant(s) Horizontal and Applicant(s) Vertical, as applicable	SCAQMD	City of Carson Department of Community Development, Building and Safety Division			
Mitigation Measure G-12: Each Applicant shall provide documentation to the City indicating both on- and off-site air-borne risks associated with construction have been evaluated to the satisfaction of DTSC (in accordance with all DTSC requirements/regulations), and at a minimum, perimeter air monitoring shall be completed for dust, particulates, and constituents determined to be Constituents of Concern (COCs). (Applicable to PA1, PA2, and PA3.)	•	•	•		Prior to the issuance of a grading permit/Pre-Construction	Applicant(s) Horizontal and Applicant(s) Vertical, as applicable	City of Carson Department of Community Development, Building and Safety Division	City of Carson Department of Community Development, Building and Safety Division			
Mitigation Measure G-13: All point source facilities shall obtain all required permits from SCAQMD. The issuance of these permits by SCAQMD shall require the operators of these facilities to implement Best Available Control Technology and other required measures that reduce emissions of criterial air pollutants.	•	•	•		Prior to the issuance of a grading permit/Pre-Construction	Applicant(s) Horizontal and Applicant(s) Vertical, as applicable	SCAQMD	City of Carson Department of Community Development, Building and Safety Division			
Mitigation Measure G-14: This measure was combined with a 2018 SEIR PDF; refer to 2021 SEIR PDF-O3. A placeholder for this mitigation measure is provided here to maintain consistent numbering of the mitigation measures.	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

**Table II-1
Mitigation Monitoring and Reporting Program**

Mitigation Measures	Applicable to				Monitoring Phase	Implementing Party	Enforcement Agency	Responsible Monitoring Agency	Verification of Compliance		
	PA1	PA2	PA3	City of Carson					Initials	Date	Remarks
Mitigation Measure G-15: This measure was replaced by 2021 SEIR PDF-O7 as it is an updated regulatory requirement modeled as part of the unmitigated scenario. PA1 and PA3 would be required to comply with the 2019 Title 24 Energy Efficiency Standards whereas PA2 would still be held to the CALGreen standards at the time of the issuance of the building permit. A placeholder for this mitigation measure is provided here to maintain consistent numbering of the mitigation measures.	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Mitigation Measure G-16: All fixtures used for lighting of exterior common areas shall be regulated by automatic devices to turn off lights when they are not needed, but a minimum level of lighting should be provided for safety.	•	•	•		Prior to the issuance of a building permit/Pre-Construction	Applicant(s) Vertical	City of Carson Department of Community Development, Building and Safety Division	City of Carson Department of Community Development, Building and Safety Division			
Mitigation Measure G-17: Building materials shall comply with all applicable SCAQMD rules and regulations. The 2021 Project shall incorporate the use of low-VOC architectural coating pursuant to SCAQMD Rule 1113 for repainting and maintenance/touch-up of the non-residential buildings and residential buildings for all common/non-living space/outdoor areas. (Applicable to PA1, PA2, and PA3.)	•	•	•		Ongoing during Operation	Applicant(s) Vertical	SCAQMD	City of Carson Department of Community Development, Building and Safety Division			
Mitigation Measure G-18: Each Applicant shall, to the extent feasible, schedule deliveries during off-peak traffic periods to encourage the reduction of trips during the most congested periods. (Applicable to PA1, PA2, and PA3.)	•	•	•		Ongoing during Construction/ Ongoing during Post-Construction	Applicant(s) Horizontal and Applicant(s) Vertical, as applicable	City of Carson Department of Community Development, Building and Safety Division	City of Carson Department of Community Development, Building and Safety Division			

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Mitigation Monitoring and Reporting Program**

Mitigation Measures	Applicable to				Monitoring Phase	Implementing Party	Enforcement Agency	Responsible Monitoring Agency	Verification of Compliance		
	PA1	PA2	PA3	City of Carson					Initials	Date	Remarks
Mitigation Measure G-19: Each Applicant shall coordinate with the MTA and the City of Carson and Los Angeles Department of Transportation to provide information with regard to local bus and rail services. (Applicable to PA1, PA2, and PA3.)	•	•	•		Ongoing during Post-Construction	Applicant(s) Vertical	City of Carson Department of Community Development, Planning Division	City of Carson Department of Community Development, Planning Division			
Mitigation Measure G-20: During site plan review, consideration shall be given regarding the provision of safe and convenient access to bus stops and public transportation facilities.	•	•	•		Site Plan Review/Pre-Construction	Applicant(s) Vertical	City of Carson Department of Community Development, Planning Division	City of Carson Department of Community Development, Planning Division			
Mitigation Measure G-21: Each Applicant shall pay a fair-share contribution for a low-emissions shuttle service between the Project Site and other major activity centers within the 2021 Project vicinity (i.e., the Metro Rail Blue Line station at Del Amo Boulevard and Santa Fe Avenue and the Carson Transfer Station at the South Bay Pavilion). (Applicable to PA1, PA2, and PA3(b). Not applicable to PA3(a) as it is an industrial land use.)	•	•	• (PA 3(b))		Prior to Certificate of Occupancy/ Post-Construction	Applicant(s) Vertical	City of Carson Department of Community Development, Planning Division	City of Carson Department of Community Development, Planning Division			
Mitigation Measure G-22: This measure is included as part of 2021 SEIR PDF-O5. A placeholder for this mitigation measure is provided here to maintain consistent numbering of the mitigation measures.	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Mitigation Measure G-23: This measure is included as part of 2021 SEIR PDF-O5. A placeholder for this mitigation measure is provided here to maintain consistent numbering of the mitigation measures.	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

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Mitigation Measures	Applicable to				Monitoring Phase	Implementing Party	Enforcement Agency	Responsible Monitoring Agency	Verification of Compliance		
	PA1	PA2	PA3	City of Carson					Initials	Date	Remarks
Mitigation Measure G-24: This measure is included as part of 2021 SEIR PDF-O5. A placeholder for this mitigation measure is provided here to maintain consistent numbering of the mitigation measures.	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Mitigation Measure G-25: This measure was removed in the 2018 SEIR. A placeholder for this mitigation measure is provided here to maintain consistent numbering of the mitigation measures.	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Mitigation Measure G-26: Mitigation Measure G-26 is removed as the revisions to Mitigation Measure G-7 incorporates schedule changes and low-VOC content coating use. A placeholder for this mitigation measure is provided here to maintain consistent numbering of the mitigation measures.	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Mitigation Measure G-27: The on-site residential units shall not contain any hearths, either wood burning, natural gas, or propane. (Applicable to PA1, PA2, and PA3.)	•	•	•		Prior to issuance of a building permit/Pre-Construction	Applicant(s) Vertical (Residential only)	City of Carson Department of Community Development, Building and Safety and Planning Divisions	City of Carson Department of Community Development, Building and Safety and Planning Divisions			
Mitigation Measure G-28: This measure is replaced by 2021 SEIR PDF-O6 as it is part of the unmitigated scenario. A placeholder for this mitigation measure is provided here to maintain consistent numbering of the mitigation measures.	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

**Table II-1
Mitigation Monitoring and Reporting Program**

Mitigation Measures	Applicable to				Monitoring Phase	Implementing Party	Enforcement Agency	Responsible Monitoring Agency	Verification of Compliance		
	PA1	PA2	PA3	City of Carson					Initials	Date	Remarks
Mitigation Measure G-29: The 2021 Project shall designate at least 8 percent of all commercial parking spaces for priority parking for carpool/vanpool and/or clean air vehicles and comply with California Green Building Standards Code (CALGreen). (Applicable to PA2.)		•			Prior to issuance of building permit/Pre-Construction; Prior to issuance of Certificate of Occupancy/ Post-Construction	Applicant(s) Vertical	City of Carson Department of Community Development, Planning Division	City of Carson Department of Community Development, Planning Division			
2021 SEIR PDF-C1: Mobile off-road construction equipment (wheeled or tracked) and all diesel-fueled off-road construction equipment used during construction of the 2021 Project shall meet the USEPA Tier 4 final standards, either as original equipment or equipment retrofitted to meet the Tier 4 final standards. In the event of specialized equipment use where Tier 4 equipment is not commercially available at the time of construction, then the equipment shall, at a minimum, meet the Tier 3 standard. Zero-emissions construction equipment shall be incorporated when commercially available at no more than a 30 percent price differential compared to non-zero-emissions equipment. For purposes of this project design feature, “commercially available” is defined as equipment built by the original manufacturer and available for lease or hire within 20 miles of the City of Carson and available in a similar timeframe to fossil-fueled options. If Tier 4 Final engine equipment or zero-emissions equipment is not commercially available, the contractor must show proof	•	•	•		Prior to the issuance of a grading permit/ Construction	Applicant(s) Horizontal and Applicant(s) Vertical, as applicable	SCAQMD	City of Carson Department of Community Development, Planning Division			

**Table II-1
Mitigation Monitoring and Reporting Program**

Mitigation Measures	Applicable to				Monitoring Phase	Implementing Party	Enforcement Agency	Responsible Monitoring Agency	Verification of Compliance		
	PA1	PA2	PA3	City of Carson					Initials	Date	Remarks
that the equipment is not commercially available by providing letters from at least two independent rental companies, each of which must own or operate a construction equipment fleet with total maximum horsepower of greater than 2,500 horsepower, for each piece of off-road equipment where the Tier 4 Final engine or zero-emissions equipment is not available. This requirement shall be incorporated into applicable bid documents, purchase orders, and contracts with successful contractors demonstrating 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 shall be available upon request at the time of mobilization of each applicable unit of equipment. (Modified from a 2018 SEIR PDF) (Applicable to PA1, PA2, and PA3.)											
2021 SEIR PDF-C2: Limiting excavations to avoid exposing landfill contents. (Applicable to PA1, PA2, and PA3.)	•	•	•		Prior to the issuance of a grading permit/ Construction	Applicant(s) Horizontal and Applicant(s) Vertical, as applicable	City of Carson Department of Community Development, Building and Safety Division	City of Carson Department of Community Development, Building and Safety Division			
2021 SEIR PDF-C3: General contractors shall implement a fugitive dust control program pursuant to the provisions of SCAQMD Rule 403. Grading in PA1 and PA3 shall be prohibited on days when the SCAQMD Air Quality Index Forecast exceeds 100 for particulates or ozone for the Project Site. (Modified from 2018 SEIR Mitigation Measure G-1) (Applicable to PA1, PA2, and PA3.)	•	•	•		Prior to the issuance of a grading permit/ Construction	Applicant(s) Horizontal and Applicant(s) Vertical, as applicable	SCAQMD	City of Carson Department of Community Development, Planning Division			

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Mitigation Monitoring and Reporting Program**

Mitigation Measures	Applicable to				Monitoring Phase	Implementing Party	Enforcement Agency	Responsible Monitoring Agency	Verification of Compliance		
	PA1	PA2	PA3	City of Carson					Initials	Date	Remarks
2021 SEIR PDF-C4: Electric hook-ups to the power grid or battery power shall be used rather than temporary diesel- or gasoline-powered generators for electric construction tools, such as saws, drills, and compressors, whenever feasible. For PA3 and PA1, mobile off-road construction equipment of less than 50 horsepower shall be electric. including: air compressors, concrete/industrial saws, welders and plate compactors. Mobile off-road construction equipment with a power rating of 19 kilowatts or less shall be battery powered. If generators need to be used to reach remote portions of the site, non-diesel generators shall be used. (Modified from 2018 SEIR Mitigation Measure G-4) (Applicable to PA1, PA2, and PA3.)	•	•	•		Prior to the issuance of a grading permit/ Construction	Applicant(s) Horizontal and Applicant(s) Vertical, as applicable	SCAQMD	City of Carson Department of Community Development, Building and Safety Division			
2021 SEIR PDF-C5: All construction vehicles shall be prohibited from idling in excess of 5 minutes per occurrence and location, both on and off site. (Applicable to PA2.) All construction vehicles shall be prohibited from idling in excess of 2 minutes per occurrence and location, both on and off site. Individual pieces of diesel-powered off-road diesel equipment shall be prohibited from being in the “on” position for more than 10 hours per day. (Modified from 2018 SEIR Mitigation Measure G-5) (Applicable to PA1 and PA3.)	•	•	•		Prior to the issuance of a grading permit/ Construction	Applicant(s) Horizontal and Applicant(s) Vertical, as applicable	SCAQMD	City of Carson Department of Community Development, Building and Safety Division			

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Mitigation Monitoring and Reporting Program**

Mitigation Measures	Applicable to				Monitoring Phase	Implementing Party	Enforcement Agency	Responsible Monitoring Agency	Verification of Compliance		
	PA1	PA2	PA3	City of Carson					Initials	Date	Remarks
2021 SEIR PDF-C6: All fleet-contracted on-road heavy-duty haul trucks used for remediation and construction hauling activities shall be model year 2014 or newer if diesel fueled. The requirement for the use of 2014 or newer vehicles does not apply to delivery trucks or other non-contracted fleets. (Applicable to PA1, PA2, and PA3.)	•	•	•		Prior to the issuance of a grading permit/Pre-Construction	Applicant(s) Horizontal and Applicant(s) Vertical, as applicable	SCAQMD	City of Carson Department of Community Development, Building and Safety Division			
2021 SEIR PDF-C7: Contractors shall conduct routine inspections (at least once per calendar week during active construction) to verify compliance with construction mitigation and to identify other opportunities to further reduce construction impacts. Inspection reports shall be maintained on site throughout the construction period. (Applicable to PA1, PA2, and PA3.)	•	•	•		Ongoing during Construction	Applicant(s) Horizontal and Applicant(s) Vertical, as applicable	SCAQMD	City of Carson Department of Community Development, Building and Safety Division			
2021 SEIR PDF-C8: 2021 Project contractors shall provide information on transit and ride sharing programs and services to construction employees. As can be safely accommodated (at the sole discretion of the construction Site Supervisor), provide for meal options on site, or shuttle buses between the site and nearby meal destinations for use by construction contractors. (Applicable to PA1, PA2, and PA3.)	•	•	•		Ongoing during Construction	Applicant(s) Horizontal and Applicant(s) Vertical, as applicable	City of Carson Department of Community Development, Planning Division	City of Carson Department of Community Development, Building and Safety Division			
2021 SEIR PDF-C9: During construction, the amount of daily grading disturbance area shall be limited to 10 acres (excluding remediation activities). (Applicable to PA3.)			•		Ongoing during Construction	Applicant(s) Horizontal	City of Carson Department of Community Development, Planning Division	City of Carson Department of Community Development, Building and Safety Division			

**Table II-1
Mitigation Monitoring and Reporting Program**

Mitigation Measures	Applicable to				Monitoring Phase	Implementing Party	Enforcement Agency	Responsible Monitoring Agency	Verification of Compliance		
	PA1	PA2	PA3	City of Carson					Initials	Date	Remarks
2021 SEIR PDF-O1: The 2021 Project would include an impervious barrier to control odiferous and air toxic emissions in compliance with the approved RAP. (Applicable to PA1, PA2, and PA3.)	•	•	•		Prior to the issuance of a building permit/Pre-Construction; Prior to issuance of a certificate of occupancy/ Post-Construction	Applicant(s) Horizontal	City of Carson Department of Community Development, Building and Safety Division	City of Carson Department of Community Development, Building and Safety Division			
2021 SEIR PDF-O2: All stationary-source emissions sources (e.g., landfill gas flares, emergency generator) would utilize Best Available Control Technology (BACT) to meet SCAQMD requirements, and would maintain appropriate SCAQMD permits.) (Applicable to PA1, PA2, and PA3.)	•	•	•		Ongoing during operation/ Post-Construction	Applicant(s) Vertical	City of Carson Department of Community Development, Planning Division	City of Carson Department of Community Development, Planning Division			
2021 SEIR PDF-O3: Land uses within the Project Site shall not allow for high levels of potential (i) toxic contaminants or (ii) odors. All TAC sources shall be permitted through SCAQMD as appropriate. (Modified from a 2018 SEIR PDF and 2018 SEIR Mitigation Measure G-14) (Applicable to PA1, PA2, and PA3.)	•	•	•		Site Plan Review/Pre-Construction	Applicant(s) Vertical	City of Carson Department of Community Development, Planning Division	City of Carson Department of Community Development, Planning Division			
2021 SEIR PDF-O4: All residential and non-residential buildings shall meet or exceed the more stringent of the 2019 California Title 24 Efficiency standards or others adopted by the City. (Modified from 2018 SEIR Mitigation Measure G-15) (Applicable to PA1, PA2, and PA3.)	•	•	•		Prior to the issuance of a building permit/Pre-Construction	Applicant(s) Vertical	City of Carson Department of Community Development, Building and Safety Division	City of Carson Department of Community Development, Building and Safety Division			

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Mitigation Monitoring and Reporting Program**

Mitigation Measures	Applicable to				Monitoring Phase	Implementing Party	Enforcement Agency	Responsible Monitoring Agency	Verification of Compliance		
	PA1	PA2	PA3	City of Carson					Initials	Date	Remarks
2021 SEIR PDF-O5: The Applicant(s) of each planning area within the Project Site shall implement the following trip demand measures:											
a) Provide bicycle racks located at convenient locations throughout the 2021 Project. (Modified from 2018 SEIR Mitigation Measure G-22) (Applicable to PA1, PA2, and PA3.)	•	•	•		Prior to Certificate of Occupancy/ Post-Construction	Applicant(s) Horizontal and Applicant(s) Vertical, as applicable	City of Carson Department of Community Development, Planning Division	City of Carson Department of Community Development, Planning Division			
b) Provide bicycle paths along the main routes throughout the Project Site consistent with the 2021 Specific Plan Amendment. (Modified from 2018 SEIR Mitigation Measure G-23) (Applicable to PA1, PA2, and PA3.)	•	•	•		Prior to issuance of a grading permit/Pre-Construction	Applicant(s) Vertical	City of Carson Department of Community Development, Planning and Traffic Engineering Divisions	City of Carson Department of Community Development, Planning and Traffic Engineering Divisions			
c) Provide convenient pedestrian access throughout the Project Site. (Modified from 2018 SEIR Mitigation Measure G-24) (Applicable to PA1, PA2, and PA3.)	•	•	•		Prior to issuance of a building permit/Pre-Construction	Applicant(s) Vertical	City of Carson Department of Community Development, Planning Division	City of Carson Department of Community Development, Planning Division			
d) Provide on-site shower facilities for use by all employees bicycling/walking to work. (Applicable to the light industrial uses in PA3(a).)			• (PA 3(a))		At plan check/Pre-Construction; Prior to issuance of a certificate of	Applicant(s) Vertical	City of Carson Department of Community Development, Building and Safety Division	City of Carson Department of Community Development, Building and Safety Division			

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Mitigation Measures	Applicable to				Monitoring Phase	Implementing Party	Enforcement Agency	Responsible Monitoring Agency	Verification of Compliance		
	PA1	PA2	PA3	City of Carson					Initials	Date	Remarks
					occupancy for PA3(a)						
e) Light industrial tenants shall provide preferential parking for employees using vehicles displaying valid “clean air vehicle” decals issued by the California Department of Motor Vehicles. Percentage of parking to be allotted by facility shall be governed by City or CALGreen standards. (Applicable to the light industrial uses in PA3(a).)			• (PA 3(a))		Prior to issuance of a certificate of occupancy for PA3(a)/ Post-Construction	Applicant(s) Vertical	City of Carson Department of Community Development, Building and Safety Division	City of Carson Department of Community Development, Building and Safety Division			
f) Each light industrial tenant within PA3(a) shall be responsible for having a designated coordinator to oversee a carpool match or other ride-share program for the facility. The programs for all tenants shall be interlinked to provide expanded resources for ride-share/carpool opportunities. (Applicable to the light industrial uses in PA3(a).)			• (PA 3(a))		Ongoing during operation of PA3(a)/Post-Construction	Applicant(s) Vertical	City of Carson Department of Community Development, Planning Division	City of Carson Department of Community Development, Planning Division			
2021 SEIR PDF-O6: The 2021 Project shall incorporate outdoor electrical outlets such that 10 percent of outdoor landscaping equipment can be electrically powered. (2018 SEIR Mitigation Measure G-28) (Applicable to PA1, PA2, and PA3.)	•	•	•		Prior to issuance of a building permit/Pre-Construction	Applicant(s) Horizontal and Applicant(s) Vertical, as applicable	City of Carson Department of Community Development, Building and Safety and Planning Divisions	City of Carson Department of Community Development, Building and Safety and Planning Divisions			

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Mitigation Measures	Applicable to				Monitoring Phase	Implementing Party	Enforcement Agency	Responsible Monitoring Agency	Verification of Compliance		
	PA1	PA2	PA3	City of Carson					Initials	Date	Remarks
2021 SEIR PDF-07: Electric vehicle charging stations shall be provided as follows:											
a) The Applicant of PA1 shall provide passenger vehicle charging stations for a minimum of 6 percent parking spaces (169 spaces). Compliance shall be in accordance with CALGreen Code applicable at the time building permits are issued. (Applicable to PA1.)	•				At plan check/Pre-Construction; Prior to issuance of a certificate of occupancy for PA1/Post-Construction	Applicant(s) Vertical	City of Carson Department of Community Development, Building and Safety Division	City of Carson Department of Community Development, Building and Safety Division			
b) The Applicant of PA3 shall provide passenger vehicle charging stations for a minimum of 10 percent parking spaces (82 spaces). Compliance shall be in accordance with CALGreen Code applicable at the time building permits are issued. (Applicable to PA3.)			•		At plan check/Pre-Construction; Prior to issuance of a certificate of occupancy for PA3/Post-Construction	Applicant(s) Vertical	City of Carson Department of Community Development, Building and Safety Division	City of Carson Department of Community Development, Building and Safety Division			
c) Each of the Applicant(s) of PA1 and PA3 shall install Level 2 or better electric vehicle charging stations for a combined total of 325 spaces on site between the beginning of construction and December 2039 (the 325 spaces are in addition to the CALGreen Code requirement of 169 spaces in PA1 and 82 spaces in PA3). If on-site charging stations cannot be accommodated, charging stations may be distributed throughout the city. The 325 electrovoltaic (EV) supplied spaces will be provided for passenger and	•		•		At plan check/Pre-Construction; Prior to issuance of a certificate of occupancy for PA1 and PA2/Post-Construction	Applicant(s) Vertical	City of Carson Department of Community Development, Building and Safety Division	City of Carson Department of Community Development, Building and Safety Division			

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Mitigation Measures	Applicable to				Monitoring Phase	Implementing Party	Enforcement Agency	Responsible Monitoring Agency	Verification of Compliance		
	PA1	PA2	PA3	City of Carson					Initials	Date	Remarks
light-duty vehicles. Level 4 EV charging for trucks can be substituted at 0.11 truck spaces for every passenger vehicle space in PA3. Passenger and light-duty vehicle and truck charging requirements can be satisfied on or off site; however, on-site charging will be prioritized. (Applicable to PA1 and PA3.)											
d) Provide infrastructure, as the parking area is developed, to support the energy load for electric truck vehicle charging. Truck charging infrastructure shall be designed to support a minimum of 25 percent of the truck parking spaces for each of the light industrial use in PA3(a). (Applicable to the uses in PA3(a).)			<ul style="list-style-type: none"> • (PA 3(a)) 		Prior to issuance of a building permit/Pre-Construction	Applicant(s) Vertical	City of Carson Department of Community Development, Planning Division	City of Carson Department of Community Development, Planning Division			
e) Meet CALGreen Tier 2 green building standards, including all provisions related to designated parking for clean air vehicles, electric vehicle charging, and bicycle parking. (Applicable to the light industrial uses in PA3.)			<ul style="list-style-type: none"> • 		Prior to issuance of a building permit/Pre-Construction	Applicant(s) Vertical	City of Carson Department of Community Development, Planning Division	City of Carson Department of Community Development, Planning Division			
2021 SEIR PDF-08: All on-site equipment, such as forklifts and yard trucks shall be electric with the necessary electrical infrastructure and charging stations provided. (Applicable to PA3.)			<ul style="list-style-type: none"> • 		Ongoing during operation/ Post-Construction	Applicant(s) Vertical	City of Carson Department of Community Development, Planning Division	City of Carson Department of Community Development, Planning Division			

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Mitigation Measures	Applicable to				Monitoring Phase	Implementing Party	Enforcement Agency	Responsible Monitoring Agency	Verification of Compliance		
	PA1	PA2	PA3	City of Carson					Initials	Date	Remarks
2021 SEIR PDF-O9: When not in use all truck engines shall be turned off. Idling will be limited to 2 minutes or less per occurrence and location for PA3. Idling and operation restrictions shall be posted for view from both on-site and off-site personnel. Appropriate signage shall identify idling restrictions and contact information to report violations to CARB and SCAQMD within PA3. Idling restrictions of 5 minutes or less per occurrence and location are applicable to PA1 and PA2. (Applicable to PA1, PA2, and PA3.)	•	•	•		Ongoing during operation/ Post-Construction	Applicant(s) Vertical	City of Carson Department of Community Development, Planning Division	City of Carson Department of Community Development, Planning Division			
2021 SEIR PDF-O10: All dock doors shall be equipped with electric plugs for electric transportation refrigeration units (TRUs). All TRUs operating on site would be required to be electric (no diesel-powered TRUs permitted at all in PA3(a)) and certification and maintenance records shall be maintained for all TRUs. (Applicable to the light industrial uses in PA3(a).)			• (PA 3(a))		At plan check/Pre- Construction; Prior to issuance of a certificate of occupancy for PA3(a)/ Post- Construction	Applicant(s) Vertical	City of Carson Department of Community Development, Building and Safety Division	City of Carson Department of Community Development, Building and Safety Division			
2021 SEIR PDF-O11: To the extent feasible and permitted by local codes and regulations, all emergency-standby generators shall be non-diesel. If diesel generators are required, generators will conform to EPA Tier 4 emissions standards. (Applicable to the light industrial uses in PA3(a).)			• (PA 3(a))		At plan check/Pre- Construction; Prior to issuance of a certificate of occupancy for PA3(a)/ Post- Construction	Applicant(s) Vertical	City of Carson Department of Community Development, Building and Safety Division	City of Carson Department of Community Development, Building and Safety Division			

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	PA1	PA2	PA3	City of Carson					Initials	Date	Remarks
2021 SEIR PDF-O12: Restrict queuing on public streets where there are sensitive air quality receptors (e.g., residential or recreation related uses). Tenants shall train managers and employees on efficient scheduling and load management to eliminate unnecessary queuing and idling of trucks. Staff in charge of keeping vehicle records shall be trained in diesel technologies and compliance with CARB regulations by attending CARB-approved courses as well as maintaining on-site records demonstrating compliance. (Applicable to uses in PA3(a).)			• (PA 3(a))		Prior to PA3(a) tenant occupation/ Post-Construction	Applicant(s) Vertical	City of Carson Department of Community Development, Planning Division	City of Carson Department of Community Development, Planning Division			
2021 SEIR PDF-O13: As applicable, tenants shall be required to enroll in U.S. EPA's SmartWay program and shall use carriers that are SmartWay carriers. (Applicable to the uses in PA3(a).)			• (PA 3(a))		Prior to PA3(a) tenant occupation/ Post-Construction	Applicant(s) Vertical	City of Carson Department of Community Development, Planning Division	City of Carson Department of Community Development, Planning Division			
2021 SEIR PDF-O14: Tenants shall be provided with information on incentive programs, such as the Carl Moyer Program and Voucher Incentive Program, to upgrade their fleets. (Applicable to the uses in PA3(a).)			• (PA 3(a))		Prior to PA3(a) tenant occupation/ Post-Construction	Applicant(s) Vertical	City of Carson Department of Community Development, Planning Division	City of Carson Department of Community Development, Planning Division			

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Mitigation Measures	Applicable to				Monitoring Phase	Implementing Party	Enforcement Agency	Responsible Monitoring Agency	Verification of Compliance		
	PA1	PA2	PA3	City of Carson					Initials	Date	Remarks
2021 SEIR PDF-O15: All light industrial buildings shall implement a combination of sky lights and solar photovoltaic (PV) infrastructure such that a minimum of 25 percent of the rooftops will include solar PV arrays at buildout. In addition, 25 percent of the rooftops not otherwise covered with solar shall be structurally designed and installed to accommodate solar in the future. (Applicable to uses in PA3(a).)			<ul style="list-style-type: none"> (PA 3(a)) 		Prior to issuance of building permits/Pre-Construction; Prior to issuance of a certificate of occupancy for PA3(a)/ Post-Construction	Applicant(s) Vertical	City of Carson Department of Community Development, Planning Division	City of Carson Department of Community Development, Planning Division			
2021 SEIR PDF-O16: For the uses within PA3(a), leasing preference shall be given to prospective tenants with facility-owned and operated fleet that is alternative/ zero-emissions. At a minimum, warehouse tenants/owners and/or operators shall ensure that all truck fleets accessing the 2021 Project's light industrial uses shall meet or exceed the 2014 model-year emissions equivalent engine standards as currently defined in California Code of Regulations Title 13, Division 3, Chapter 1, Article 4.5, Section 2025. Light Industrial tenants shall ensure that of all trucks of model year 2021 and newer 75 percent will be zero- or near-zero-emissions vehicles by 2035, and 100 percent zero- or near-zero-emissions vehicles by 2040. Facility operators shall maintain records on site demonstrating compliance with this requirement and shall make records available to inspection by local jurisdiction, air districts, and the State upon request. (Applicable to the uses in PA3(a).)			<ul style="list-style-type: none"> (PA 3(a)) 		Prior to issuance of a certificate of occupancy for PA3(a)/ Post-Construction	Applicant(s) Vertical	City of Carson Department of Community Development, Planning Division	City of Carson Department of Community Development, Planning Division			

**Table II-1
Mitigation Monitoring and Reporting Program**

Mitigation Measures	Applicable to				Monitoring Phase	Implementing Party	Enforcement Agency	Responsible Monitoring Agency	Verification of Compliance		
	PA1	PA2	PA3	City of Carson					Initials	Date	Remarks
2021 SEIR PDF-O17: For the uses within PA3(a), building structures, walls or vegetation between the dock doors/truck loading areas and any sensitive receptors located within 1,000 feet of the loading areas shall be installed. (Applicable to the light industrial uses in PA3(a).)			• (PA 3(a))		Prior to issuance of building permits/Pre-Construction	Applicant(s) Vertical	City of Carson Department of Community Development, Planning Division	City of Carson Department of Community Development, Planning Division			
2021 SEIR PDF-O18: For the uses within PA3(a), the following signage shall be posted:											
a) Both interior- and exterior-facing signs shall be posted, including signs directed at all dock and delivery areas, identifying idling restrictions and contact information to report violations to CARB, SCAQMD, and the building manager. (Applicable to PA3(a).)			• (PA 3(a))		Prior to issuance of a certificate of occupancy for PA3(a)/ Post-Construction	Applicant(s) Vertical	City of Carson Department of Community Development, Planning Division	City of Carson Department of Community Development, Planning Division			
b) Signage shall be posted that clearly identifies the designated entry and exit points from the public street for trucks and service vehicles in order to minimize entrances directly adjacent to sensitive receptors. (Applicable to PA3(a).)			• (PA 3(a))		Prior to issuance of a certificate of occupancy for PA3(a)/ Post-Construction	Applicant(s) Vertical	City of Carson Department of Community Development, Planning Division	City of Carson Department of Community Development, Planning Division			
c) Signage shall be posted indicating that all parking and maintenance of trucks must be within designated on-site areas and not within surrounding community or public streets. (Applicable to PA3(a).)			• (PA 3(a))		Prior to issuance of a certificate of occupancy for PA3(a)/ Post-Construction	Applicant(s) Vertical	City of Carson Department of Community Development, Planning Division	City of Carson Department of Community Development, Planning Division			

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Mitigation Monitoring and Reporting Program**

Mitigation Measures	Applicable to				Monitoring Phase	Implementing Party	Enforcement Agency	Responsible Monitoring Agency	Verification of Compliance		
	PA1	PA2	PA3	City of Carson					Initials	Date	Remarks
2021 SEIR PDF-O19: For the uses within PA3, cool pavement shall be used to the maximum extent feasible unless prevented by geotechnical conditions associated with the existing landfill. (Applicable to the light industrial uses in PA3.)			•		Prior to issuance of building permits/Pre-Construction; Prior to issuance of a certificate of occupancy for PA3/Post-Construction	Applicant(s) Vertical	City of Carson Department of Community Development, Planning Division	City of Carson Department of Community Development, Planning Division			
2021 SEIR PDF-O20: For the uses within PA3(a), PA3(a) employees shall be provided dining options onsite or shuttle service shall be provided between the facility and nearby dining destinations. (Applicable to the light industrial uses in PA3(a).)			• (PA 3(a))		Ongoing during operation/ Post-Construction	Applicant(s) Vertical	City of Carson Department of Community Development, Planning Division	City of Carson Department of Community Development, Planning Division			
IV. Biological Resources											
Mitigation Measure K-1. Impacts to nesting birds would be avoided in PA3 by conducting all construction activities outside of the bird nesting season (i.e., from September 15 to February 14 for most birds, from July 1 to January 1 for raptors). However, if construction activities must occur during the nesting season, the following measures shall apply: A. Prior to work during the bird nesting season (February 15 to September 15 for most birds, January 1 to June 31 for raptors), a qualified biologist shall conduct a pre-construction survey of all suitable habitat for the presence of nesting birds	•	•	•		Prior to construction during the bird nesting season/Pre-Construction	Applicant(s) Horizontal	City of Carson Department of Community Development, Planning Division	City of Carson Department of Community Development, Planning Division			

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Mitigation Measures	Applicable to				Monitoring Phase	Implementing Party	Enforcement Agency	Responsible Monitoring Agency	Verification of Compliance		
	PA1	PA2	PA3	City of Carson					Initials	Date	Remarks
<p>no more than 7 days prior to construction activities, including any ground-disturbing activities (e.g., staging, mobilization, grading), as well as prior to any vegetation removal within the Project Site. The results of the pre-construction survey shall be valid for 7 days; if vegetation removal activities do not commence within 7 days following the survey or if activities cease for more than 7 consecutive days, a new pre-construction nesting bird survey shall be conducted before construction resumes.</p> <p>B. If any active nests are found during a pre-construction nesting bird survey, a buffer of up to 300 feet for most bird species and 500 feet for raptors, or as determined appropriate by the qualified biologist (based on species-specific tolerances and site-specific conditions), shall be delineated, flagged, and avoided until the nesting cycle is complete (i.e., the qualified biologist determines that the young have fledged or the nest has failed). The qualified biologist may also recommend other measures to minimize disturbances to active nests that may include but are not limited to limiting the duration of certain activities, placing sound barriers (e.g., noise blankets), or visual barriers (e.g., straw bales), and/or providing full-time monitoring by a qualified biologist.</p> <p>C. As a provisional additional mitigation element, in case surveys identify burrowing owl as present on site, such occurrence shall be documented and CDFW shall be notified. Although it is considered highly unlikely that a pair of burrowing owls might</p>											

**Table II-1
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Mitigation Measures	Applicable to				Monitoring Phase	Implementing Party	Enforcement Agency	Responsible Monitoring Agency	Verification of Compliance		
	PA1	PA2	PA3	City of Carson					Initials	Date	Remarks
attempt to nest on the site (due to disturbance, limited food resources, and presence of coyotes), if an active burrowing owl nest is encountered, a minimum buffer of 500 feet shall be delineated, flagged, and avoided by construction activity until the nesting cycle is complete (i.e., the qualified biologist determines that the young have fledged or the nest has failed). A qualified biologist may recommend other measures as noted in Item B, above. However, CDFW will be consulted prior to any reduction of avoidance buffers or implementation of other measures, such as passive relocation.											
VII. Geology and Soils											
<p>Mitigation Measure E-1: In accordance with City of Carson Municipal Code, each Applicant shall comply with site-specific recommendations set forth in engineering geology and geotechnical reports prepared to the satisfaction of the City of Carson Building Official, as follows:</p> <ul style="list-style-type: none"> The engineering geology report shall be prepared and signed by a California Certified Engineering Geologist and the geotechnical report shall be prepared and signed by a California Registered Civil Engineer experienced in the area of geotechnical engineering. Geology and geotechnical reports shall include site-specific studies and analyses for all potential geologic and/or geotechnical hazards. Geotechnical reports shall address the design of pilings, foundations, walls below grade, retaining walls, shoring, subgrade preparation for floor slab 	•	•	•		Prior to issuance of a grading permit/Pre-Construction	Applicant(s) Horizontal and Applicant(s) Vertical, as applicable	City of Carson Department of Community Development, Building and Safety Division	City of Carson Department of Community Development, Building and Safety Division			

**Table II-1
Mitigation Monitoring and Reporting Program**

Mitigation Measures	Applicable to				Monitoring Phase	Implementing Party	Enforcement Agency	Responsible Monitoring Agency	Verification of Compliance		
	PA1	PA2	PA3	City of Carson					Initials	Date	Remarks
<p>support, paving, earthwork methodologies, and dewatering, where applicable.</p> <ul style="list-style-type: none"> • Geology and geotechnical reports may be prepared separately or together. • Where the studies indicate, compensating siting and design features shall be required. • Laboratory testing of soils shall demonstrate the suitability of underlying native soils to support driven piles to the satisfaction of the City of Carson Building Official. 											
<p>Mitigation Measure E-2: Due to the classification of portions of the Project Site as a liquefaction zone, each Applicant shall demonstrate that liquefaction either (a) poses a sufficiently low hazard to satisfy the defined acceptable risk criteria, in accordance with CGS Special Bulletin 117A, or (b) implements suitable mitigation measures to effectively reduce the hazard to acceptable levels (CCR Title 14, Section 3721). The analysis of liquefaction risk shall be prepared by a registered civil engineer and shall be submitted to the satisfaction of the City building official.</p>	•	•	•		Prior to issuance of a grading permit/Pre-Construction	Applicant(s) Horizontal and Applicant(s) Vertical, as applicable	City of Carson Department of Community Development, Building and Safety Division	City of Carson Department of Community Development, Building and Safety Division			
<p>Mitigation Measure E-3: Any roads realigned from the existing configuration, or otherwise located in areas underlain by waste soils, shall comply with site-specific recommendations as set forth in engineering, geology, and geotechnical reports prepared to the satisfaction of the City of Carson building officials.</p>	•	•	•		Prior to issuance of a grading permit/Pre-Construction	Applicant(s) Horizontal	City of Carson Department of Community Development, Building and Safety Division	City of Carson Department of Community Development, Building and Safety Division			

**Table II-1
Mitigation Monitoring and Reporting Program**

Mitigation Measures	Applicable to				Monitoring Phase	Implementing Party	Enforcement Agency	Responsible Monitoring Agency	Verification of Compliance		
	PA1	PA2	PA3	City of Carson					Initials	Date	Remarks
IX. Hazards and Hazardous Materials											
Mitigation Measure D-1: To the extent each Applicant desires to refine or modify requirements in the RAP, the Applicant shall provide documentation to the City indicating DTSC approval of such refinements or modifications prior to commencement of construction.	•	•	•		Prior to issuance of grading permit/Pre-Construction	Applicant(s) Horizontal	Department of Toxic Substances Control (DTSC), CRA	California Environmental Protection Agency (Cal EPA), DTSC, CRA			
Mitigation Measure D-2: Each Applicant shall provide documentation to the City indicating DTSC shall permit any proposed residential uses prior to issuance of a building permit for residential development.	•	•	•		Prior to issuance of building permit/Pre-Construction	Applicant(s) Horizontal	DTSC	Cal EPA, DTSC, CRA			
Mitigation Measure D-3: Each Applicant shall provide documentation to the City indicating that both on- and off-site risks associated with RAP construction have been evaluated to the satisfaction of the DTSC, and at a minimum, perimeter air monitoring shall be completed for dust, particulates, and constituents determined to be Constituents of Concern (COCs). Should the air monitoring indicate any violations of air quality as defined in the RAP, then construction activities causing the exceedance shall cease until modifications have been implemented to remedy the exceedances.	•	•	•		Prior to issuance of grading or building permits/Pre-Construction; Ongoing during Construction	Applicant(s) Horizontal	DTSC, CRA	Cal EPA, DTSC, CRA			

**Table II-1
Mitigation Monitoring and Reporting Program**

Mitigation Measures	Applicable to				Monitoring Phase	Implementing Party	Enforcement Agency	Responsible Monitoring Agency	Verification of Compliance		
	PA1	PA2	PA3	City of Carson					Initials	Date	Remarks
Mitigation Measure D-4: Each Applicant shall provide to the City documentation indicating that (1) a cell-specific risk assessment has been prepared by the Applicant and approved by DTSC demonstrating that the risk of exposure for occupancy of that cell is within acceptable levels to DTSC and (2) DTSC has approved a remedial action completion report documenting that the remedial systems are properly functioning prior to issuance of a Certificate of Occupancy.	•	•	•		Prior to issuance of a Certificate of Occupancy	Applicant(s) Horizontal	DTSC, CRA	Cal EPA, DTSC, CRA			
Mitigation Measure D-5: This measure was removed in the 2018 SEIR. A placeholder for this mitigation measure is provided here to maintain consistent numbering of the mitigation measures.	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Mitigation Measure D-6: Each Applicant's construction contractor shall incorporate the contingency plan recommended under the July 9, 2008, Oil/Water Well Investigation report by Arcadis into construction specifications. The contingency plan shall be physically on site during any earthwork activities and implemented in the event that a previously unknown well is encountered at the Project Site.	•	•	•		Prior to issuance of any grading, excavation, haul route, foundation, or building permits/Pre-Construction; Ongoing during Construction	Applicant(s) Horizontal	City of Carson Department of Community Development, Building and Safety Division	City of Carson Department of Community Development, Building and Safety Division			

**Table II-1
Mitigation Monitoring and Reporting Program**

Mitigation Measures	Applicable to				Monitoring Phase	Implementing Party	Enforcement Agency	Responsible Monitoring Agency	Verification of Compliance		
	PA1	PA2	PA3	City of Carson					Initials	Date	Remarks
XIII. Noise											
<p>Mitigation Measure H-1: Prior to the issuance of any grading, excavation, haul route, foundation, or building permits, each Applicant shall provide proof satisfactory to the Building and Safety and the Community Development Department that all construction documents require contractors to comply with City of Carson Municipal Code Sections 4101(i) and (j), which requires all construction and demolition activities, including pile driving, to occur between 7:00 a.m. and 8:00 p.m. Monday through Saturday and that a noise management plan for compliance and verification has been prepared by a monitor retained by the Applicant. At a minimum, the plan shall include the following requirements:</p> <ol style="list-style-type: none"> Noise-generating equipment operated at the Project Site shall achieve a minimum noise level reduction of 10 dBA lower than the reference noise levels used in this analysis, as listed below, to be verified by submittal of manufacturer specifications, evidence of retrofit (i.e., mufflers, intake silencers, lagging, and/or engine enclosures), or monitoring data. All equipment shall be properly maintained to ensure that no additional noise, due to worn or improperly maintained parts, would be generated. 	•	•	•		Prior to issuance of any grading, excavation, haul route, foundation, or building permits/Pre-Construction; Ongoing during Construction	Applicant(s) Horizontal and Applicant(s) Vertical, as applicable	City of Carson Department of Community Development, Planning Division	City of Carson Department of Community Development, Building and Safety Division			

**Table II-1
Mitigation Monitoring and Reporting Program**

Mitigation Measures			Applicable to				Monitoring Phase	Implementing Party	Enforcement Agency	Responsible Monitoring Agency	Verification of Compliance		
			PA1	PA2	PA3	City of Carson					Initials	Date	Remarks
Equipment Type	Reference Noise Level at 50 Feet (dBA L _{max})	Mitigated Noise Level at 50 Feet (dBA L _{max})											
Welder	74	64											
Forklift	75	65											
Tractor Trailer	76	66											
Paver	77	67											
Air Compressor	78	68											
Loader													
Concrete Mixer Trucks	79	69											
Water Trucks													
Rollers	80	70											
Trencher													
Excavators													
Cranes	81	71											
Dozer	82	72											
Compactor	83	73											
Scraper	84	74											
Grader	85	75											
Concrete Saw													
Pavement Scarifier	90	80											

**Table II-1
Mitigation Monitoring and Reporting Program**

Mitigation Measures	Applicable to				Monitoring Phase	Implementing Party	Enforcement Agency	Responsible Monitoring Agency	Verification of Compliance		
	PA1	PA2	PA3	City of Carson					Initials	Date	Remarks
2. Pile drivers used within 1,500 feet of sensitive receptors shall be equipped with noise control techniques (e.g., use of noise attenuation shields or shrouds) having a minimum quieting factor of 10 dBA, or equivalent measures shall be used to result in a minimum reduction of 10 dBA at the source.											
3. Effective continuous temporary sound barriers (at least 8-foot-tall as measured from the grade upon which the noise-producing equipment are operating) equipped with noise blankets rated to achieve sound level reductions of at least 20 dBA shall enclose the active construction work area to block line-of-site between the construction equipment and occupied noise-sensitive receptors. In the alternative, equivalent measures may be used that will achieve sound level reductions of at least 20 dBA, or such lesser fraction thereof required to reach 65 dBA, at the boundary of occupied residential uses.											
4. Loading and staging areas must be located on site and away from the most noise-sensitive uses surrounding the site as determined by the Building and Safety and the Community Development Department.											
5. An approved haul route authorization that avoids noise-sensitive land uses to the maximum extent feasible.											
6. A construction relations officer shall be designated to serve as a liaison with residents, and a contact telephone number shall be provided to residents.											

**Table II-1
Mitigation Monitoring and Reporting Program**

Mitigation Measures	Applicable to				Monitoring Phase	Implementing Party	Enforcement Agency	Responsible Monitoring Agency	Verification of Compliance		
	PA1	PA2	PA3	City of Carson					Initials	Date	Remarks
Mitigation Measure H-2: A deep dynamic compaction (DDC) Pilot Program was performed in April 2008 by Tetra Tech to observe and review vibration impacts of DDC activities (2018 SEIR p. IV.H-17). Therefore, this mitigation measure has been implemented, and it is removed from this 2021 SEIR. A placeholder for this mitigation measure is provided here to maintain consistent numbering of the mitigation measures.	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Mitigation Measure H-3: Continuous vibration monitoring shall be conducted on an ongoing basis during DDC and pile driving activities. All vibration levels measured by the monitors shall be logged with documentation of the measurements provided to the City. If DDC and/or pile driving vibration levels at any time exceed the 0.2 inch per second (in/s) PPV (at the residential side of Torrance Lateral) or 2.0 in/s PPV (at Development District 3 [DD3]) threshold levels, DDC and/or pile driving activity shall immediately stop, until modified construction methods are established that would reduce the vibration levels to less than the applicable threshold levels, as defined above.	•	•	•		Ongoing during Construction	Applicant(s) Horizontal	City of Carson Department of Community Development, Building and Safety and Planning Divisions	City of Carson Department of Community Development, Building and Safety and Planning Divisions			
Mitigation Measure H-4: A construction and construction-related monitor satisfactory to the Community Development Director (or a designee) shall be retained by each Applicant to document compliance with the mitigation measures. Said Monitor's qualifications, identification, address, and telephone number shall be listed in the contracts and shall be placed in the pertinent files of the Community Development Department. The Monitor will be required	•	•	•		Prior to issuance of any grading, excavation, haul route, foundation, or building permits/Pre-Construction;	Applicant(s) Horizontal and Applicant(s) Vertical, as applicable	City of Carson Department of Community Development, Planning Division	City of Carson Department of Community Development, Planning Division			

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Mitigation Monitoring and Reporting Program**

Mitigation Measures	Applicable to				Monitoring Phase	Implementing Party	Enforcement Agency	Responsible Monitoring Agency	Verification of Compliance		
	PA1	PA2	PA3	City of Carson					Initials	Date	Remarks
<p>to monitor all construction and construction-related activities on the Project Site on a periodic basis; keep all written records, which shall be open for public inspection; and to file monthly reports with the City and appropriate permit granting authorities. In addition:</p> <ol style="list-style-type: none"> Information shall be provided on a weekly basis regarding construction activities and their duration. A Construction Relations Officer shall be established and funded by the Applicant, and approved by the Community Development Director (or a designee), to act as a liaison with neighbors and residents concerning on-site construction activity. As part of this mitigation measure, the Applicant shall establish a 24-hour telephone construction hotline, which will be staffed between the hours of 8:00 a.m. and 5:00 p.m. on a Monday through Saturday basis throughout the 2021 Project's entire construction period for the purposes of answering questions and resolving disputes with adjacent property owners. The hotline number shall be posted on the Project Site. The Applicant shall require in all construction and construction-related contracts and subcontracts, provisions requiring compliance with special environmental conditions included in all relevant entitlement approval actions of the City of Carson. Such provisions shall also include retention of the power to effect prompt corrective action by the Applicant, its representative, or prime contractor, subcontractor, or operator to correct noticed noncompliance. 					Ongoing during Construction						

**Table II-1
Mitigation Monitoring and Reporting Program**

Mitigation Measures	Applicable to				Monitoring Phase	Implementing Party	Enforcement Agency	Responsible Monitoring Agency	Verification of Compliance		
	PA1	PA2	PA3	City of Carson					Initials	Date	Remarks
3. During construction, loading and staging areas must be located on site and away from occupied noise-sensitive uses surrounding the Project Site as determined by the Community Development Director.											
Mitigation Measure H-5: Mitigation Measure H-5 is no longer required as daytime and nighttime impacts associated with parking lot noise have been analyzed in this 2021 SEIR, and impacts have been found to be less than significant without the incorporation of mitigation. A placeholder for this mitigation measure is provided here to maintain consistent numbering of the mitigation measures.	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Mitigation Measure H-6: All parking structures shall be located a minimum of 150 feet from an off-site residential structure use located to the south and west (across the Torrance Lateral) unless the exterior wall of the parking structure that faces the off-site residential use is a solid wall or provides acoustical louvers (or equivalent noise reduction measures).	•	•			Prior to issuance of a grading permit/Pre-Construction	Applicant(s) Vertical	City of Carson Department of Community Development, Planning Division	City of Carson Department of Community Development, Planning Division			
Mitigation Measure H-7: Mitigation Measure H-7 is not required as the daytime and nighttime operation, even with the inclusion of trucks on the Project Site, have been studied in this 2021 SEIR, and impacts have been found to be less than significant without the incorporation of mitigation. A placeholder for this mitigation measure is provided here to maintain consistent numbering of the mitigation measures.	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

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Mitigation Measures	Applicable to				Monitoring Phase	Implementing Party	Enforcement Agency	Responsible Monitoring Agency	Verification of Compliance		
	PA1	PA2	PA3	City of Carson					Initials	Date	Remarks
Mitigation Measure H-8: This measure was removed in the 2018 SEIR. A placeholder for this mitigation measure is provided here to maintain consistent numbering of the mitigation measures.	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Mitigation Measure H-9: This measure was removed in the 2018 SEIR. A placeholder for this mitigation measure is provided here to maintain consistent numbering of the mitigation measures.	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Mitigation Measure H-10: This measure was removed in the 2018 SEIR. A placeholder for this mitigation measure is provided here to maintain consistent numbering of the mitigation measures.	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
XV. Public Services											
Fire Protection											
Mitigation Measure I.1-1: Prior to construction, each Applicant shall submit buildings plans to the Los Angeles County Fire Department (LACoFD) for review. Based on such plan check, any additional fire safety recommendations shall be implemented to the satisfaction of the LACoFD.	•	•	•		Prior to issuance of a building permit/Pre-Construction	Applicant(s) Vertical	Los Angeles County Fire Department (LACoFD)	LACoFD			
Mitigation Measure I.1-2: Each Applicant shall provide adequate ingress/egress access points for emergency response to the satisfaction of the LACoFD.	•	•	•		Prior to issuance of a building permit/Pre-Construction	Applicant(s) Vertical	LACoFD	LACoFD			

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Mitigation Measures	Applicable to				Monitoring Phase	Implementing Party	Enforcement Agency	Responsible Monitoring Agency	Verification of Compliance		
	PA1	PA2	PA3	City of Carson					Initials	Date	Remarks
Mitigation Measure I.1-3: Each Applicant shall comply with all applicable fire code and ordinance requirements for construction, access, water mains, fire flows, and fire hydrants as required by the LACoFD.	•	•	•		Prior to issuance of a building permit/Pre-Construction	Applicant(s) Horizontal and Applicant(s) Vertical, as applicable	LACoFD	LACoFD			
Mitigation Measure I.1-4: Every building shall be accessible to LACoFD apparatus by way of access roadways, with an all-weather surface of not less than the width prescribed by the LACoFD. The roadway shall extend to within 150 feet of all portions of exterior building walls when measured by an unobstructed route around the exterior of the building or as otherwise required by the LACoFD according to Los Angeles County Fire Code.	•	•	•		Prior to issuance of a building permit/Pre-Construction	Applicant(s) Horizontal and Applicants Vertical, as applicable	LACoFD	LACoFD			
Mitigation Measure I.1-5: Requirements for access, fire flows, and hydrants shall be addressed during the City's subdivision tentative map stage or prior to the transfer of any portion of the Project Site to the Applicant.	•	•	•		Prior to issuance of a building permit/Pre-Construction	Applicant(s) Horizontal	LACoFD	LACoFD			
Mitigation Measure I.1-6: Fire sprinkler systems shall be installed in all residential and commercial occupancies to the satisfaction of the LACoFD.	•	•	•		Prior to issuance of a building permit/Pre-Construction	Applicant(s) Vertical	LACoFD	LACoFD			

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Mitigation Measures	Applicable to				Monitoring Phase	Implementing Party	Enforcement Agency	Responsible Monitoring Agency	Verification of Compliance		
	PA1	PA2	PA3	City of Carson					Initials	Date	Remarks
<p>Mitigation Measure I.1-7: Each Applicant shall ensure that adequate water pressure is available to meet Code-required fire flow. Based on the size of the buildings, proximity of other structures, and construction type, a maximum fire flow up to 4,000 gallons per minute (gpm) at 20 pounds per square inch (psi) residual pressure for up to a four-hour duration may be required.</p>	•	•	•		Prior to issuance of a building permit/Pre-Construction	Applicant(s) Horizontal and Applicant(s) Vertical, as applicable	LACoFD	LACoFD			
<p>Mitigation Measure I.1-8: Fire hydrant spacing shall be as required by the LACoFD according to Los Angeles County Fire Code, which is anticipated to be 300 feet and meeting the following requirements:</p> <ul style="list-style-type: none"> • No portion of a lot's frontage shall be more than 200 feet via vehicular access from a properly spaced fire hydrant; • No portion of a building shall exceed 400 feet via vehicular access from a properly spaced fire hydrant; • Additional hydrants shall be required if spacing exceeds specified distances; • When a cul-de-sac depth exceeds 200 feet on a commercial street, hydrants shall be required at the corner and mid-block; • A cul-de-sac shall not be more than 500 feet in length, when serving land zoned for commercial use; and • Turning radii in a commercial zone shall not be less than 32 feet. The measurement shall be determined at the centerline of the road. A turning area shall be provided for all driveways exceeding 150 feet in length at the end of all cul-de-sacs, to the satisfaction of the LACoFD. 	•	•	•		Prior to issuance of a building permit/Pre-Construction	Applicant(s) Horizontal and Applicant(s) Vertical, as applicable	LACoFD	LACoFD			

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Mitigation Measures	Applicable to				Monitoring Phase	Implementing Party	Enforcement Agency	Responsible Monitoring Agency	Verification of Compliance		
	PA1	PA2	PA3	City of Carson					Initials	Date	Remarks
Mitigation Measure I.1-9: All on-site driveways and roadways shall provide a minimum unobstructed (clear-to-sky) width of 28 feet. The on-site driveways shall be within 150 feet of all portions of the exterior walls of the first story of any building. The centerline of the access driveway shall be located parallel to, and within 30 feet of, an exterior wall on one side of the proposed structure or as otherwise required by the LACoFD according to Los Angeles County Fire Code.	•	•	•		Prior to issuance of a building permit/Pre-Construction	Applicant(s) Vertical	LACoFD	LACoFD			
Mitigation Measure I.1-10: All on-site driveways shall be provided as required by the LACoFD according to Los Angeles County Fire Code, which is anticipated to be a minimum unobstructed (clear-to-sky) width of 28 feet but may be increased under the following conditions: <ul style="list-style-type: none"> • If parallel parking is allowed on one side of the access roadway/driveway, the roadway width shall be 34 feet; and • If parallel parking is allowed on both sides of the access roadway/driveway, the roadway width shall be 36 feet in a residential area or 42 feet in a commercial area. 	•	•	•		Prior to issuance of a building permit/Pre-Construction	Applicant(s) Vertical	LACoFD	LACoFD			
Mitigation Measure I.1-11: The entrance to any street or driveway with parking restrictions shall be posted with LACoFD-approved signs stating “NO PARKING – FIRE LANE” in 3-inch-high letters, at intermittent distances of 150 feet. Any access-way that is less than 34 feet in width shall be labeled “Fire Lane” on the final tract map and final building plans.	•	•	•		Prior to issuance of a building permit/Pre-Construction	Applicant(s) Horizontal	LACoFD	LACoFD			

**Table II-1
Mitigation Monitoring and Reporting Program**

Mitigation Measures	Applicable to				Monitoring Phase	Implementing Party	Enforcement Agency	Responsible Monitoring Agency	Verification of Compliance		
	PA1	PA2	PA3	City of Carson					Initials	Date	Remarks
<p>Mitigation Measure I.1-12: The following standards apply to the 2021 Project’s residential component or as otherwise required by the LACoFD according to Los Angeles County Fire Code:</p> <ul style="list-style-type: none"> • A cul-de-sac shall be a minimum of 34 feet in width and shall not be more than 700 feet in length; • The length of the cul-de-sac may be increased to 1,000 feet if a minimum 36-foot-wide roadway is provided; and • An LACoFD-approved turning radius shall be provided at the terminus of all residential cul-de-sacs. 	•	•			Prior to issuance of a building permit/Pre-Construction	Applicant(s) Vertical (Residential only).	LACoFD	LACoFD			
<p>Mitigation Measure I.1-13: This measure was removed from the 2018 SEIR. A placeholder for this mitigation measure is provided here to maintain consistent numbering of the mitigation measures.</p>	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
<p>Mitigation Measure I.1-14: All access devices and gates shall meet the following requirements or as otherwise required by the LACoFD according to Los Angeles County Fire Code:</p> <ul style="list-style-type: none"> • Any single-gated opening used for ingress and egress shall be a minimum of 26 feet clear-to-sky; • 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; • 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 	•	•	•		Prior to issuance of a building permit/Pre-Construction	Applicant(s) Vertical	LACoFD	LACoFD			

**Table II-1
Mitigation Monitoring and Reporting Program**

Mitigation Measures	Applicable to				Monitoring Phase	Implementing Party	Enforcement Agency	Responsible Monitoring Agency	Verification of Compliance		
	PA1	PA2	PA3	City of Carson					Initials	Date	Remarks
<p>system is used, the 50 feet shall be measured from the right-of-way to the intercom control device;</p> <ul style="list-style-type: none"> All limited access devices shall be of a type approved by LACoFD; and Gate plans shall be submitted to LACoFD prior to installation. These plans shall show all locations, widths, and details of the proposed gates. 											
<p>Mitigation Measure I.1-15: All proposals for traffic calming measures (speed humps/bumps/cushions, traffic circles, roundabouts, etc.) shall be submitted to LACoFD for review prior to implementation.</p>	•	•	•		Prior to issuance of a building permit/Pre-Construction	Applicant(s) Horizontal and Applicant(s) Vertical, as applicable	LACoFD	LACoFD			
<p>Mitigation Measure I.1-16: 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.</p>	•	•	•		Prior to issuance of a building permit/Pre-Construction	Applicant(s) Horizontal and Applicant(s) Vertical, as applicable	LACoFD	LACoFD			
<p>Mitigation Measure I.1-17: Any 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" shall be required throughout construction.</p>	•	•	•		Prior to issuance of a building permit/Pre-Construction	Applicant(s) Horizontal and Applicant(s) Vertical, as applicable	LACoFD	LACoFD			
<p>Mitigation Measure I.1-18: Disruptions to water services shall be coordinated with LACoFD, and alternate water sources shall be provided for fire protection during such disruptions.</p>	•	•	•		As needed during Construction; As needed during Operation	Applicant(s) Horizontal and Applicant(s) Vertical, as applicable	LACoFD	LACoFD			

**Table II-1
Mitigation Monitoring and Reporting Program**

Mitigation Measures	Applicable to				Monitoring Phase	Implementing Party	Enforcement Agency	Responsible Monitoring Agency	Verification of Compliance		
	PA1	PA2	PA3	City of Carson					Initials	Date	Remarks
Police											
Mitigation Measure I.2-1: The Applicant shall provide private security services within PA2 and PA3 that are occupied by commercial development. On-site security services shall maintain an ongoing dialogue with the Sheriff's Department so as to maximize the value of the security service provided.	•	•	•		Prior to issuance of a certificate of occupancy/ Ongoing during Operation	Applicant(s) Vertical	City of Carson Public Safety Services Division	City of Carson Public Safety Services Division			
Mitigation Measure I.2-2: This 2021 SEIR deletes this mitigation measure in lieu of Mitigation Measure I.2-8, which requires the payment of an annual CFD fee to fund Sheriff's Department services, facilities, and equipment that would offset the impacts of the 2021 Project. A placeholder for this mitigation measure is provided here to maintain consistent numbering of the mitigation measures.	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Mitigation Measure I.2-3: The Applicant shall install video cameras throughout the commercial development within PA2 and PA3 with a digitally recorded feed to the substation that is also accessible via the internet at the Carson Sheriff's Station.		•	•		Prior to issuance of a certificate of occupancy/ Ongoing during Operation	Applicant(s) Vertical	City of Carson Public Safety Services Division	City of Carson Public Safety Services Division			

**Table II-1
Mitigation Monitoring and Reporting Program**

Mitigation Measures	Applicable to				Monitoring Phase	Implementing Party	Enforcement Agency	Responsible Monitoring Agency	Verification of Compliance		
	PA1	PA2	PA3	City of Carson					Initials	Date	Remarks
Mitigation Measure I.2-4: The Applicant shall develop jointly with the Sheriff's Department a community policing plan, subject to final review and approval by the Sheriff's Department.		•	•		Prior to issuance of a certificate of occupancy/ Ongoing during Operation	Applicant(s) Vertical	City of Carson Public Safety Services Division	City of Carson Public Safety Services Division			
Mitigation Measure I.2-5: Each Applicant shall develop a private security plan that shall be provided to the Sheriff's Department for input on the adequacy of the private security plan and provide further recommendations, as necessary, to be incorporated into the private security plan.	•	•	•		Prior to issuance of a certificate of occupancy/ Ongoing during Operation	Applicant(s) Vertical	City of Carson Department of Community Development, Planning Division	City of Carson Department of Community Development, Planning Division			
Mitigation Measure I.2-6: The management of the entertainment venues (e.g., performance pavilion) located within the Project Site shall annually notify the Sheriff's Station in advance of planned activities.		•	•		Ongoing during Operation	Applicant(s) Vertical	City of Carson Public Safety Services Division	City of Carson Public Safety Services Division			
Mitigation Measure I.2-7: The Sheriff's Department Crime Prevention Unit shall be contacted for advice on crime prevention programs that could be incorporated into the Project, including Neighborhood Watch.	•	•	•		Prior to issuance of a certificate of occupancy/ Ongoing during Operation	Applicant(s) Vertical	City of Carson Public Safety Services Division	City of Carson Public Safety Services Division			

**Table II-1
Mitigation Monitoring and Reporting Program**

Mitigation Measures	Applicable to				Monitoring Phase	Implementing Party	Enforcement Agency	Responsible Monitoring Agency	Verification of Compliance		
	PA1	PA2	PA3	City of Carson					Initials	Date	Remarks
Mitigation Measure I.2-8: Applicant(s) of PA1, PA2, and PA3 shall pay an annual Citywide Community Facilities District (CFD) fee payment as part of their fair-share contribution for Sheriff department services, facilities, and equipment that is required to offset the impacts of the Project.	•	•	•		Prior to issuance of a building permit; on ongoing annually	Applicant(s) Vertical	City of Carson Department of Community Development, Planning Division	City of Carson Department of Community Development, Planning Division			
Parks and Recreation											
Mitigation Measure I.4-1: Residential uses of the 2021 Project shall provide park and recreation facilities that would be met through the provision of park space, on-site improvements, and/or, the payment of in-lieu Development Impact Fees (DIF).	•	•			Prior to the issuance of a building permit/Pre-Construction	Applicant(s) Vertical (Residential only)	City of Carson Department of Community Development, Planning Division	City of Carson Department of Community Development, Planning Division			
Mitigation Measure I.4-2: Residential uses of the 2021 Project shall meet the intent of Municipal Code Sections 9128.15 and 9128.54 through the provision of private open space as defined therein and/or the provision of additional amenities that meet the recreational needs of Project residents, e.g., health clubs.	•	•			Prior to the issuance of a building permit/Pre-Construction	Applicant(s) Vertical (Residential only)	City of Carson Department of Community Development, Planning Division	City of Carson Department of Community Development, Planning Division			

**Table II-1
Mitigation Monitoring and Reporting Program**

Mitigation Measures	Applicable to				Monitoring Phase	Implementing Party	Enforcement Agency	Responsible Monitoring Agency	Verification of Compliance		
	PA1	PA2	PA3	City of Carson					Initials	Date	Remarks
<p>Mitigation Measure I.4-3: Public open space for residential uses of the 2021 Project shall be calculated on a per-unit basis:</p> <ul style="list-style-type: none"> ● For PA1: <ul style="list-style-type: none"> – Studio and 1-Bedroom Units: a minimum of 150 sf per unit – 2-Bedroom Units: a minimum of 220 sf per unit – 3+-Bedroom Units: a minimum of 250 sf per unit – All with a minimum dimension of 15 feet in any direction 	●	●			Prior to the issuance of a building permit/Pre-Construction	Applicant(s) Vertical (Residential only)	City of Carson Department of Community Development, Planning Division	City of Carson Department of Community Development, Planning Division			
Libraries											
<p>Mitigation Measure I.5-1:^d Applicants for residential uses shall pay a fair-share contribution for the improvement of library facilities that are required to offset impacts of the 2021 Project, subject to approval of the County of Los Angeles Public Library.</p>	●	●			Prior to the issuance of a building permit/Pre-Construction	Applicant(s) Vertical (Residential only)	City of Carson Department of Community Development, Planning Division	City of Carson Department of Community Development, Planning Division			
XVII. Transportation											
<p>Mitigation Measure C-1: A Construction Traffic Management Plan shall be developed by the contractor and approved by the City of Carson to alleviate construction period impacts, which may include but is not limited to the following measures:</p> <ul style="list-style-type: none"> ● In the unlikely case that on-site truck staging areas are insufficient, provide off-site truck staging in a legal area (per the local jurisdiction’s municipal code) furnished by the construction truck contractor. 	●	●	●		Prior to issuance of a grading permit/Pre-Construction; during Construction	Applicant(s) Horizontal and Applicant(s) Vertical, as applicable	City of Carson Department of Public Works, Traffic Engineering Division	City of Carson Department of Public Works, Traffic Engineering Division			

**Table II-1
Mitigation Monitoring and Reporting Program**

Mitigation Measures	Applicable to				Monitoring Phase	Implementing Party	Enforcement Agency	Responsible Monitoring Agency	Verification of Compliance		
	PA1	PA2	PA3	City of Carson					Initials	Date	Remarks
<p>Anticipated truck access to the Project Site will be off Lenardo Drive and Stamps Drive.</p> <ul style="list-style-type: none"> • Schedule deliveries and pick-ups of construction materials during non-peak commute travel periods (e.g., early morning, midday) to the extent possible and coordinate to reduce the potential of trucks waiting to load or unload for protracted periods. • As a vehicular travel lane, parking lane, bicycle lane, and/or sidewalk closures are anticipated, worksite traffic control plan(s), approved by the City of Carson, should be implemented to route vehicular traffic, bicyclists, and pedestrians around any such closures. • Establish requirements for loading/unloading and storage of materials on the Project Site, including the locations where parking spaces would be affected, the length of time traffic travel lanes would be blocked, and sidewalk closures or pedestrian diversions to ensure the safety of the pedestrian and access to local businesses and residences. • Ensure that access will remain unobstructed for land uses in proximity to the Project Site during project construction. • Coordinate with the City and emergency service providers to ensure adequate access is maintained to the Project Site and neighboring businesses and residences. 											

**Table II-1
Mitigation Monitoring and Reporting Program**

Mitigation Measures	Applicable to				Monitoring Phase	Implementing Party	Enforcement Agency	Responsible Monitoring Agency	Verification of Compliance		
	PA1	PA2	PA3	City of Carson					Initials	Date	Remarks
Mitigation Measure C-2: This measure was removed in the 2018 SEIR. A placeholder for this mitigation measure is provided here to maintain consistent numbering of the mitigation measures.	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Mitigation Measure C-2.1: Mitigation Measure C-2.1, which reduces an LOS impact, is no longer required pursuant to SB 743. A placeholder for this mitigation measure is provided here to maintain consistent numbering of the mitigation measures.	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Mitigation Measure C-3: Mitigation Measure C-3, which reduces an LOS impact, is no longer required pursuant to SB 743. A placeholder for this mitigation measure is provided here to maintain consistent numbering of the mitigation measures.	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Mitigation Measure C-4: This measure was removed in the 2018 SEIR. A placeholder for this mitigation measure is provided here to maintain consistent numbering of the mitigation measures.	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Mitigation Measure C-5: Mitigation Measure C-5, which reduces an LOS impact, is no longer required pursuant to SB 743. A placeholder for this mitigation measure is provided here to maintain consistent numbering of the mitigation measures.	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Mitigation Measure C-6: Mitigation Measure C-6, which reduces an LOS impact, is no longer required pursuant to SB 743. A placeholder for this mitigation measure is provided here to maintain consistent numbering of the mitigation measures.	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

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Mitigation Monitoring and Reporting Program**

Mitigation Measures	Applicable to				Monitoring Phase	Implementing Party	Enforcement Agency	Responsible Monitoring Agency	Verification of Compliance		
	PA1	PA2	PA3	City of Carson					Initials	Date	Remarks
2021 SEIR Mitigation Measure C-6.1: Mitigation Measure C-6.1, which reduces an LOS impact, is no longer required pursuant to SB 743. A placeholder for this mitigation measure is provided here to maintain consistent numbering of the mitigation measures.	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Mitigation Measure C-7: This measure was removed in the 2018 SEIR. A placeholder for this mitigation measure is provided here to maintain consistent numbering of the mitigation measures.	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Mitigation Measure C-8: Mitigation Measure C-8, which reduces an LOS impact, is no longer required pursuant to SB 743. A placeholder for this mitigation measure is provided here to maintain consistent numbering of the mitigation measures.	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Mitigation Measure C-9: Mitigation Measure C-9, which reduces an LOS impact, is no longer required pursuant to SB 743. A placeholder for this mitigation measure is provided here to maintain consistent numbering of the mitigation measures.	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Mitigation Measure C-10: This measure was removed in the 2018 SEIR. A placeholder for this mitigation measure is provided here to maintain consistent numbering of the mitigation measures.	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Mitigation Measure C-10.1: Mitigation Measure C-10.1, which reduces an LOS impact, is no longer required pursuant to SB 743. A placeholder for this mitigation measure is provided here to maintain consistent numbering of the mitigation measures.	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

**Table II-1
Mitigation Monitoring and Reporting Program**

Mitigation Measures	Applicable to				Monitoring Phase	Implementing Party	Enforcement Agency	Responsible Monitoring Agency	Verification of Compliance		
	PA1	PA2	PA3	City of Carson					Initials	Date	Remarks
Mitigation Measure C-11: Mitigation Measure C-11, which reduces an LOS impact, is no longer required pursuant to SB 743. A placeholder for this mitigation measure is provided here to maintain consistent numbering of the mitigation measures.	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Mitigation Measure C-12: This measure was removed in the 2018 SEIR. A placeholder for this mitigation measure is provided here to maintain consistent numbering of the mitigation measures.	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Mitigation Measure C-13: This measure was removed in the 2018 SEIR. A placeholder for this mitigation measure is provided here to maintain consistent numbering of the mitigation measures.	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Mitigation Measure C-14: Mitigation Measure C-14, which reduces an LOS impact, is no longer required pursuant to SB 743. A placeholder for this mitigation measure is provided here to maintain consistent numbering of the mitigation measures.	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Mitigation Measure C-15: This measure was removed in the 2018 SEIR. A placeholder for this mitigation measure is provided here to maintain consistent numbering of the mitigation measures.	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Mitigation Measure C-16: Mitigation Measure C-16, which reduces an LOS impact, is no longer required pursuant to SB 743. A placeholder for this mitigation measure is provided here to maintain consistent numbering of the mitigation measures.	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

**Table II-1
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Mitigation Measures	Applicable to				Monitoring Phase	Implementing Party	Enforcement Agency	Responsible Monitoring Agency	Verification of Compliance		
	PA1	PA2	PA3	City of Carson					Initials	Date	Remarks
Mitigation Measure C-17: This measure was removed in the 2018 SEIR. A placeholder for this mitigation measure is provided here to maintain consistent numbering of the mitigation measures.	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
<p>Mitigation Measure C-18: The PA1, PA2, and PA3 Applicant(s) shall implement a Transportation Demand Management (TDM) Program aimed at discouraging single-occupancy vehicle trips and encouraging alternative modes of transportation, such as carpooling, taking transit, walking, and biking. The TDM Program shall be subject to review and approval prior to issuance of certificate of occupancies by the City of Carson Department of Public Works subject to the requirements specified below. Mandatory strategies in the TDM Program shall include the TDM strategies summarized below. This TDM program is estimated to reduce total VMT per service population by about 2 percent based on the trip reduction methodology described in the California Air Pollution Control Officers Association (CAPCOA) <i>Quantifying Greenhouse Gas Mitigation Measures</i> report.</p> <ul style="list-style-type: none"> • <i>Unbundled Parking</i>—Unbundling parking typically separates the cost of purchasing or renting parking spaces from the cost of the purchasing or renting a dwelling unit. Saving money on a dwelling unit by forgoing a parking space acts as an incentive that minimizes auto ownership. Similarly, paying for parking (by purchasing or leasing a space) acts as a disincentive that discourages auto ownership and trip-making. (Applicable to PA1.) 	•	•	•		Prior to the issuance of the first occupancy permit/Post-Construction	Applicant(s) Vertical	City of Carson Department of Public Works, Traffic Engineering Division	City of Carson Department of Public Works, Traffic Engineering Division			

**Table II-1
Mitigation Monitoring and Reporting Program**

Mitigation Measures	Applicable to				Monitoring Phase	Implementing Party	Enforcement Agency	Responsible Monitoring Agency	Verification of Compliance		
	PA1	PA2	PA3	City of Carson					Initials	Date	Remarks
<ul style="list-style-type: none"> ● <i>Rideshare Programs</i>—Rideshare programs typically include the provision of an on-site transit and rideshare information center that provides assistance to help people form carpools or access transit alternatives. Rideshare programs often also include priority parking for carpools. Rideshare programs are more commonly provided for Project Site employees but residents could also benefit from a similar program. (Applicable to PA1 and PA3.) ● <i>Transit Pass Discount Program</i>—Transit pass discount programs are typically negotiated with transit service providers to purchase transit passes in bulk and, therefore, at a discounted rate. Discounted passes are then sold to interested residents or employees, helping them to obtain price discounts through the economies of scale of bulk purchasing. Transit pass discount programs are generally provided to Project Site employees but could also be sold to residents. (Applicable to PA1 and PA3.) ● <i>Bicycle Parking and Bike Share Program</i>—The 2021 Project shall include bicycle facilities within the Project Site as well as short-term bicycle parking. The 2021 Project could provide additional complementary amenities such as long-term bicycle parking, self-service bike repair area, and potentially a bike share service among residents, employees and visitors of the Project Site. (Applicable to PA1 and PA3.) ● <i>Car Share Program</i>—A car share program is a model of car rental where people rent cars for short 											

**Table II-1
Mitigation Monitoring and Reporting Program**

Mitigation Measures	Applicable to				Monitoring Phase	Implementing Party	Enforcement Agency	Responsible Monitoring Agency	Verification of Compliance		
	PA1	PA2	PA3	City of Carson					Initials	Date	Remarks
periods of time, often by the hour. The programs are attractive to customers who make only occasional use of a vehicle, as well as others who would like occasional access to a vehicle of a different type than they use day-to-day. (Applicable to PA1 and PA3.)											
XIX. Utilities and Service Systems											
Water Supply											
Mitigation Measure J.1-1: The Building Department and the Community Development Department shall review building plans to ensure that water-reducing measures are utilized, as required by Title 20 and Title 24 of the California Administrative Code. These measures include, but are not limited to, water conserving dishwashers, low-volume toilet tanks, and flow control devices for faucets.	•	•	•		Prior to the issuance of a building permit/Pre-Construction	Applicant(s) Vertical	City of Carson Department of Community Development, Planning and Building and Safety Divisions	City of Carson Department of Community Development, Planning and Building and Safety Divisions			
Mitigation Measure J.1-2: The 2021 Project shall comply with the City’s landscape ordinance, “A Water Efficient Landscape Ordinance,” as required by the State Water Conservation Landscape Act.	•	•	•		Prior to issuance of Certificate of Occupancy	Applicant(s) Horizontal and Applicant(s) Vertical, as applicable	City of Carson Department of Community Development, Planning Division	City of Carson Department of Community Development, Planning Division			
Mitigation Measure J.1-3: Each Applicant shall provide reclaimed water for the 2021 Project’s non-potable water needs, if feasible.	•	•	•		Prior to issuance of Certificate of Occupancy	Applicant(s) Horizontal and Applicant(s) Vertical, as applicable	City of Carson Department of Community Development, Planning Division	City of Carson Department of Community Development, Planning Division			

**Table II-1
Mitigation Monitoring and Reporting Program**

Mitigation Measures	Applicable to				Monitoring Phase	Implementing Party	Enforcement Agency	Responsible Monitoring Agency	Verification of Compliance		
	PA1	PA2	PA3	City of Carson					Initials	Date	Remarks
Mitigation Measure J.1-4: Landscaping of the Project Site shall utilize xeriscape (low-maintenance, drought-resistant) plantings.	•	•	•		At site plan review/Pre-Construction; Prior to issuance of Certificate of Occupancy	Applicant(s) Horizontal and Applicant(s) Vertical, as applicable	City of Carson Department of Community Development, Planning Division	City of Carson Department of Community Development, Planning Division			
Mitigation Measure J.1-5: Automatic irrigation systems shall be set to ensure irrigation during early morning or evening hours to minimize water loss due to evaporation. Sprinklers must be reset to water less in cooler months and during rainfall season so that water is not wasted on excessive landscape irrigation.	•	•	•		At site plan review/Pre-Construction; Prior to issuance of Certificate of Occupancy	Applicant(s) Horizontal and Applicant(s) Vertical, as applicable	City of Carson Department of Community Development, Planning Division	City of Carson Department of Community Development, Planning Division			
Mitigation Measure J.1-6: The 2021 Project shall be designed to recycle all water used in cooling systems to the maximum extent possible.	•	•	•		At site plan review/Pre-Construction; Prior to issuance of Certificate of Occupancy	Applicant(s) Vertical	City of Carson Department of Community Development, Planning Division	City of Carson Department of Community Development, Planning Division			
Mitigation Measure J.1-7: To the maximum extent feasible, reclaimed water shall be used during the grading and construction phase of the 2021 Project for the following activities: (1) dust control, (2) soil compaction, and (3) concrete mixing.	•	•	•		Ongoing during Pre-Construction	Applicant(s) Horizontal and Applicant(s) Vertical, as applicable	City of Carson Department of Community Development, Planning Division	City of Carson Department of Community Development, Planning Division			

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Mitigation Measures	Applicable to				Monitoring Phase	Implementing Party	Enforcement Agency	Responsible Monitoring Agency	Verification of Compliance		
	PA1	PA2	PA3	City of Carson					Initials	Date	Remarks
Mitigation Measure J.1-8: Water lines and hydrants shall be sized and located so as to meet the fire flow requirements established by the Los Angeles County Fire Department.	•	•	•		Prior to issuance of a grading permit/Pre-Construction	Applicant(s) Horizontal and Applicant(s) Vertical, as applicable	LACoFD	LACoFD			
Wastewater											
Mitigation Measure J.2-1: All required sewer improvements shall be designed and constructed according to the standards of the City of Carson and County of Los Angeles.	•	•	•		At site plan review/Pre-Construction; Prior to issuance of Certificate of Occupancy	Applicant(s) Horizontal	City of Carson Department of Community Development, Building and Safety Division	City of Carson Department of Community Development, Building and Safety Division			
Mitigation Measure J.2-2: Fee payment is required prior to the issuance of a permit to connect to district sewer facilities.	•	•	•		Prior to issuance of a building permit/Pre-Construction	Applicant(s) Vertical	City of Carson Department of Community Development, Building and Safety Division	City of Carson Department of Community Development, Building and Safety Division			
Mitigation Measure J.2-3: The Building and Safety and Planning Divisions of the Community Development Department shall review building plans to ensure that water-reducing measures are utilized, as required by Title 24 of the California Administrative Code. These measures include, but are not limited to, water-conserving dishwashers, low-volume toilet tanks, and flow-control devices for faucets.	•	•	•		Prior to issuance of a building permit/Pre-Construction	Applicant(s) Vertical	City of Carson Department of Community Development, Building and Safety and Planning Divisions	City of Carson Department of Community Development, Building and Safety and Planning Divisions			

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Mitigation Monitoring and Reporting Program**

Mitigation Measures	Applicable to				Monitoring Phase	Implementing Party	Enforcement Agency	Responsible Monitoring Agency	Verification of Compliance		
	PA1	PA2	PA3	City of Carson					Initials	Date	Remarks
Mitigation Measure J.2-4: When available, the 2021 Project shall use reclaimed water for the irrigation system and for other appropriate purposes such as during construction.	•	•	•		Prior to issuance of a building permit/Pre-Construction	Applicant(s) Horizontal and Applicant(s) Vertical, as applicable	City of Carson Department of Community Development, Building and Safety and Planning Divisions	City of Carson Department of Community Development, Building and Safety and Planning Divisions			
Solid Waste											
Mitigation Measure J.3-1: All structures constructed or uses established within any part of the Project Site shall be designed to be permanently equipped with clearly marked, durable, source-sorted recycling bins at all times to facilitate the separation and deposit of recyclable materials.	•	•	•		Prior to the issuance of the first occupancy permit/Post-Construction	Applicant(s) Horizontal and Applicant(s) Vertical, as applicable	City of Carson Department of Community Development, Planning Division	City of Carson Department of Community Development, Planning Division			
Mitigation Measure J.3-2: Primary collection bins shall be designed to facilitate mechanized collection of such recyclable wastes for transport to on- or off-site recycling facilities.	•	•	•		Prior to the issuance of the first occupancy permit/Post-Construction	Applicant(s) Vertical	City of Carson Department of Community Development, Planning Division	City of Carson Department of Community Development, Planning Division			

**Table II-1
Mitigation Monitoring and Reporting Program**

Mitigation Measures	Applicable to				Monitoring Phase	Implementing Party	Enforcement Agency	Responsible Monitoring Agency	Verification of Compliance		
	PA1	PA2	PA3	City of Carson					Initials	Date	Remarks
Mitigation Measure J.3-3: Each Applicant shall coordinate with the City of Carson to continuously maintain in good order for the convenience of patrons, employees, and residents clearly marked, durable, and separate recycling bins on the same lot, or parcel to facilitate the deposit of recyclable or commingled waste metal, cardboard, paper, glass, and plastic therein; maintain accessibility to such bins at all times, for collection of such wastes for transport to on- or off-site recycling plants; and require waste haulers to utilize local or regional material recovery facilities as feasible and appropriate.	•	•	•		Prior to the issuance of the first occupancy permit/Post-Construction	Applicant(s) Vertical	City of Carson Department of Community Development, Planning Division	City of Carson Department of Community Development, Planning Division			
Mitigation Measure J.3-4: Any existing on-site roads that are torn up shall be ground on site and recycled into the new road base.	•	•	•		Prior to the issuance of the first occupancy permit/Post-Construction	Applicant(s) Horizontal	City of Carson Department of Community Development, Planning Division	City of Carson Department of Community Development, Planning Division			
Mitigation Measure J.3-5: Compaction facilities for non-recyclable materials shall be provided in every occupied building greater than 20,000 square feet in size to reduce both the total volume of solid waste produced and the number of trips required for collection, to the extent feasible.	•	•	•		At site plan review/Pre-Construction; Prior to issuance of Certificate of Occupancy	Applicant(s) Vertical	City of Carson Department of Community Development, Planning Division	City of Carson Department of Community Development, Planning Division			

**Table II-1
Mitigation Monitoring and Reporting Program**

Mitigation Measures	Applicable to				Monitoring Phase	Implementing Party	Enforcement Agency	Responsible Monitoring Agency	Verification of Compliance		
	PA1	PA2	PA3	City of Carson					Initials	Date	Remarks
Mitigation Measure J.3-6: All construction debris shall be recycled in a practical, available, accessible manner, to the extent feasible, during the construction phase.	•	•	•		Ongoing during Construction	Applicant(s) Horizontal and Applicant(s) Vertical, as applicable	City of Carson Department of Community Development, Planning Division	City of Carson Department of Community Development, Planning Division			

SOURCE: ESA 2022.

N/A = Not Applicable

- ^a The 2018 mitigation measures have been carried forward to this 2021 Draft SEIR and are reflected herein. In some cases, the 2018 Final SEIR mitigation measures have been revised to address the potential impacts that may result from the 2021 Project. Edits to the 2018 Final SEIR mitigation measures are provided as strikethrough for removed text and double underline for added text. In addition, new mitigation measures that are proposed to reduce impacts resulting from the 2021 Project are shown entirely with double underline.
- ^b These mitigation measures are both reflected in the 2021 Specific Plan Amendment and considered regulatory requirements.
- ^c These mitigation measures are reflected in the 2021 Specific Plan Amendment.
- ^d These mitigation measures are considered regulatory requirements.

III. ADDITIONS AND CORRECTIONS TO THE 2021 DRAFT SEIR

III.A INTRODUCTION

This chapter provides a means by which the updates or clarifications to the 2021 Draft SEIR are presented in one place. Clarifications to the 2021 Draft SEIR are provided as a result of responses to public and agency comments received in response to the 2021 Draft SEIR during the public review period of October 29 through December 13, 2021, and/or new information that has become available since publication of the 2021 Draft SEIR. Comments were provided by agencies, by the general public, and during comments at a public meeting and Planning Commission workshop. The preparers of the 2021 Draft SEIR also reviewed the documents for any additional errata updates. This information, below, is presented as a correction, update, and addition to the 2021 Draft SEIR, and replaces the specified references in the 2021 Draft SEIR as noted herein. The changes described in this chapter do not result in any new or increased significant environmental impacts that would result from the 2021 Project. The revised text does not provide new information that identifies new significant environmental impacts and does not identify mitigation measures that, if implemented, would result in significant environmental impacts; as well, considerably different alternatives or mitigation measures were not identified that would clearly lessen the significant environmental impacts of the proposed project but that the lead agency declines to adopt. In sum, the text changes provided below do not change any of the conclusions presented in the 2021 Draft SEIR in a manner that would require recirculation of the 2022 SEIR.

Updates in this 2022 Final SEIR are noted as either additions with double underline or deletions with ~~double strikethrough~~. This is to further distinguish updates in the 2022 Final SEIR from updates to mitigation measures in the 2021 Draft SEIR, which highlighted those updates to show modifications to the mitigation measures originally adopted in the certified 2018 SEIR, depicting those additions with a single underline or deletions with a ~~single strikethrough~~.

III.B ADDITIONS AND CORRECTIONS

III.B.1 Chapter I, Summary

a. Volume I, p. I-31, I. Aesthetics, third row, fifth column, Mitigation Measure B-4

...

- **Signage.** A comprehensive sign program shall be prepared for each Planning Area that provides the final design, size, location, and illuminance of signage within a Planning Area. As part of the application submittal for the comprehensive sign program, if necessary, a technical lighting study shall be prepared to ensure that the proposed signs comply with Mitigation Measures B-3a and B-3b regarding illuminance, and that no spillover or adverse effects to adjacent residential uses shall occur.

b. Volume I, p. I-32, III. Air Quality, first row, third column, following 2021 SEIR PDF-A3

2021 SEIR PDF-A4: On PA3, vegetation and tree canopy along project perimeter near offsite residents adjacent to project area shall be improved and maintained. Trees should be selected by a registered arborist as appropriate for the location. Tree canopy coverage along the perimeter shall have a width of at least 20 feet with continuous unbroken coverage within 5 years subject to any limitations posed by the underlying geotechnical conditions or the specimen requirements, or other limitations, in the Specific Plan.

c. Volume I, p. I-33, III. Air Quality, second row, third column

2021 SEIR PDF-C1: Mobile off-road construction equipment (wheeled or tracked) and all diesel-fueled off-road construction equipment used during construction of the 2021 Project shall meet the USEPA Tier 4 final standards, either as original equipment or equipment retrofitted to meet the Tier 4 final standards. In the event of specialized equipment use where Tier 4 equipment is not commercially available at the time of construction, then the equipment shall, at a minimum, meet the Tier 3 standard. Zero-emissions construction equipment shall be incorporated when commercially available at no more than a 30 percent price differential compared to non-zero-emissions equipment. For purposes of this project design feature, "commercially available" is defined as equipment built by the original manufacturer and available for lease or hire within 20 miles of the City of Carson and available in a similar timeframe to fossil-fueled options. If Tier 4 Final engine equipment or zero-emissions equipment is not commercially available, the contractor must show proof that the equipment is not commercially available by providing letters from at least two independent rental companies, each of which must own or operate a construction equipment fleet with total maximum horsepower of greater than 2,500 horsepower, for each piece of off-road equipment where the Tier 4 Final engine or zero-emissions equipment is not available. This requirement shall be incorporated into applicable bid documents, purchase orders, and contracts with successful contractors demonstrating 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 shall be available upon request at the time of mobilization of each applicable unit of equipment. (Modified from 2018 SEIR PDF Mitigation Measure G-6) (Applicable to PA1, PA2, and PA3; zero-emissions construction equipment use is not required for PA2.)

d. Volume I, p. I-33, III. Air Quality, second row, third column

2021 SEIR PDF-C3: General contractors shall implement a fugitive dust control program pursuant to the provisions of SCAQMD Rule 403. Grading in PA1 and PA3 shall be prohibited on days when SCAQMD Air Quality Index Forecast exceed 100 for particulates or ozone for the Project Site. (Modified from 2018 SEIR Mitigation Measure G-1).^{8a} (Applicable to PA1, PA2, and PA3.)

^{8a} SCAQMD Rule 403 requirements are regulations that are part of the unmitigated modeling scenario; therefore, this mitigation measure is now 2021 SEIR PDF-C3.

e. Volume I, p. I-33, III. Air Quality, second row, fifth column

Mitigation Measure G-7: To reduce VOC emissions associated with construction activities, ~~the contractor for PA1 shall ensure that VOC emissions from architectural coating activities have low VOC content, or that architectural coating activities for PA1 do not occur at the same time as architectural coating activities for PA2~~ painting within each of the Planning Areas would not overlap and would also use low-VOC paints pursuant to SCAQMD Rule 1113. (Applicable to PA1, PA2, and PA3.)

f. Volume I, p. I-34, III. Air Quality, third column

2021 SEIR PDF-C4: Electric hook-ups to the power grid or battery power shall be used rather than temporary diesel- or gasoline-powered generators for electric construction tools, such as saws, drills, and compressors, whenever feasible. For PA3 and PA1, mobile off-road construction equipment of less than 50 horsepower shall be electric, including: air compressors, concrete/industrial saws, welders and plate compactors. Mobile off-road construction equipment with a power rating of 19 kilowatts or less shall be battery powered. If generators need to be used to reach remote portions of the site, non-diesel generators shall be used. (Applicable to PA1, PA2, and PA3.)

...

2021 SEIR PDF-C6: All fleet-contracted on-road heavy-duty haul trucks used for remediation and construction hauling activities from PA1 and PA3 shall be model year 2014 or newer if diesel fueled. The requirement for the use of 2014 or newer vehicles does not apply to delivery trucks or other non-contracted fleets. (Applicable to PA1, PA2, and PA3.)

2021 SEIR PDF-C7: Contractors shall conduct routine inspections (at least once per calendar week during active construction) to verify compliance with construction mitigation and to identify other opportunities to further reduce construction impacts. Inspection reports shall be maintained on site throughout the construction period. (Applicable to PA1, PA2, and PA3.)

2021 SEIR PDF-C8: 2021 Project contractors shall provide information on transit and ride sharing programs and services to construction employees. As feasible can be safely accommodated (at the sole discretion of the construction Site Supervisor), provide for meal options on site, or shuttle buses between the site and nearby meal destinations for use by construction contractors. (Applicable to PA1, PA2, and PA3.)

2021 SEIR PDF-C9: During construction, the amount of daily grading disturbance area shall be limited to 10 acres (excluding remediation activities). (Applicable to PA3.)

g. Volume I, p. I-34, III. Air Quality, fifth column

Mitigation Measure G-17: Building materials shall comply with all applicable SCAQMD rules and regulations. ~~The use of low-VOC cleaning products shall be required in all hotels.~~ The 2021 Project shall incorporate the use of low-VOC architectural coating pursuant to SCAQMD Rule 1113 for repainting and maintenance/touch-up of the non-residential buildings and residential buildings for all common/non-living space/outdoor areas. (Applicable to PA1, PA2, and PA3.)

Mitigation Measure G-21: Each Applicant shall pay a fair-share contribution for a low-emissions shuttle service between the Project Site and other major activity centers within the 2021 Project vicinity (i.e., the Metro Rail Blue Line station at Del Amo Boulevard and Santa Fe Avenue and the Carson Transfer Station at the South Bay Pavilion). (Applicable to PA1, ~~and PA2, and PA3(b).~~ Not applicable to PA3(a) as it is an industrial land use.)

h. Volume I, p. I-35, III. Air Quality, third column

2021 SEIR PDF-O4: All residential and non-residential buildings shall meet or exceed the more stringent of the 2019 California Title 24 Efficiency standards or others adopted by the City. (Applicable to PA1, PA2, and PA3; ~~PA2 applicability is limited to the Title 24 efficiency standards effective at the time construction began.~~)

2021 SEIR PDF-O5: The Applicant(s) of each planning area within the Project Site shall implement the following trip demand measures:

- a) Provide bicycle racks located at convenient locations throughout the 2021 Project. (Applicable to PA1, PA2, and PA3.)
- b) Provide bicycle paths along the main routes throughout the Project Site consistent with the 2021 Specific Plan Amendment. (Applicable to PA1, PA2, and PA3.)
- c) Provide convenient pedestrian access throughout the Project Site. (Applicable to PA1, PA2, and PA3.)
- d) Provide on-site shower facilities for use by all employees bicycling/walking to work. (Applicable to the light industrial uses in PA3(a).)

- e) Light industrial tenants shall provide preferential parking for employees using vehicles displaying valid “clean air vehicles” decals issued by the California Department of Motor Vehicles. Percentage of parking to be allotted by facility shall be governed by City or CALGreen standards. (Applicable to the light industrial uses in PA3(a).)
- f) Each light industrial tenant within PA3(a) shall be responsible for having a designated coordinator to oversee a carpool match or other ride-share program for the facility. ~~To the extent feasible, the~~ programs for all tenants shall be interlinked to provide expanded resources for ride-share/carpool opportunities. (Applicable to the light industrial uses in PA3(a).)

i. Volume I, p. I-36, III. Air Quality, third column

2021 SEIR PDF-07: Electric vehicle charging stations shall be provided as follows:

- a) The Applicant of PA1 shall provide passenger vehicle charging stations for a minimum of 6 percent parking spaces (169 spaces). Compliance shall be in accordance with CALGreen Code applicable at the time building permits are issued. (Applicable to PA1.)
- b) The Applicant of PA3 shall provide passenger vehicle charging stations for a minimum of 10 percent parking spaces (82 spaces). Compliance shall be in accordance with CALGreen Code applicable at the time building permits are issued. (Applicable to PA3.)
- c) Each of the Applicant(s) of PA1 and PA3 shall install Level 2 or better electric vehicle charging stations for a combined total of 325 spaces on site between the beginning of construction and December 2039 (the 325 spaces are in addition to the CALGreen Code requirement of 169 spaces in PA1 and 82 spaces in PA3). If on-site charging stations cannot be accommodated, charging stations may be distributed throughout the city. The 325 electrovoltaic (EV) supplied spaces will be provided for passenger and light-duty vehicles. Level 4 EV charging for trucks can be substituted at 0.11 truck spaces for every passenger vehicle space in PA3. Passenger and light-duty vehicle and truck charging requirements can be satisfied on or off site; however, on-site charging will be prioritized. (Applicable to PA1 and PA3.)
- d) Provide infrastructure, as the parking area is developed, to support the energy load for electric truck vehicle charging. Truck charging infrastructure shall be designed to support a minimum of 25 percent of the truck parking spaces for each of the light industrial use in PA3(a). (Applicable to the uses in PA3(a).)
- e) Meet CALGreen Tier 2 green building standards, including all provisions related to designated parking for clean air vehicles, electric vehicle charging, and bicycle parking. (Applicable to the light industrial uses in PA3.)

j. Volume I, p. I-37, III. Air Quality, third column

2021 SEIR PDF-09: When not in use all truck engines shall be turned off. Idling will be limited to 2 minutes or less per occurrence and location for PA3. Idling and operation restrictions shall be posted for view from both on-site and off-site personnel. Appropriate signage shall identify idling restrictions and contact information to report violations to CARB and SCAQMD within PA3. ~~Consistent with the 2018 SEIR, idling restrictions of 5 minutes or less per occurrence and location are~~ applicable to PA1 and PA2. (Applicable to P1, PA2, and PA3.)

k. Volume I, p. I-37, III. Air Quality, third column

2021 SEIR PDF-015: All light industrial buildings shall implement a combination of sky lights and solar photovoltaic (PV) infrastructure such that a minimum of 25 percent of the rooftops will include solar PV arrays at buildout. In addition, 25 percent of the rooftops not otherwise covered with solar shall be structurally designed and installed to accommodate solar in the future. (Applicable to uses in PA3(a).)

l. Volume I, p. I-38, III. Air Quality, first row, third column

2021 SEIR PDF-016: For the uses within PA3(a), leasing preference shall be given to prospective tenants with a facility-owned and operated fleet that is alternative/zero-emissions. All owned or contracted fleets. At a minimum, warehouse tenants/owners and/or operators shall ensure that all truck fleets accessing the 2021 Project’s light industrial uses shall meet or exceed the 2014 model-year emissions equivalent engine standards as currently defined in California Code of Regulations Title 13, Division 3, Chapter 1, Article 4.5, Section 2025. Light Industrial tenants shall ensure that of all trucks of model year 2021 and newer 75 percent will be zero- or near-zero-emissions vehicles by 2035, and 100 percent zero- or near-zero-emissions vehicles by 2040. Facility operators shall maintain records on site demonstrating compliance with this requirement and shall make records available to inspection by local jurisdiction, air districts, and the State upon request. (Applicable to the uses in PA3(a).)

2021 SEIR PDF-O17: For the uses within PA3(a), building structures, walls or vegetation between the dock doors/truck loading areas and any sensitive receptors located within 1,000 feet of the loading areas shall be installed. (Applicable to the light industrial uses in PA3(a).)

2021 SEIR PDF-O18: For the uses within PA3(a), the following signage shall be posted:

- a) Both interior- and exterior-facing signs shall be posted, including signs directed at all dock and delivery areas, identifying idling restrictions and contact information to report violations to CARB, SCAQMD, and the building manager. (Applicable to PA3(a).)
- b) Signage shall be posted that clearly identifies the designated entry and exit points from the public street for trucks and service vehicles in order to minimize entrances directly adjacent to sensitive receptors. (Applicable to PA3(a).)
- c) Signage shall be posted indicating that all parking and maintenance of trucks must be within designated on-site areas and not within surrounding community or public streets. (Applicable to PA3(a).)

2021 SEIR PDF-O19: For the uses within PA3, cool pavement shall be used to the maximum extent feasible unless prevented by geotechnical conditions associated with the existing landfill. (Applicable to the light industrial uses in PA3.)

2021 SEIR PDF-O20: For the uses within PA3(a), PA3(a) employees shall be provided dining options onsite or shuttle service shall be provided between the facility and nearby dining destinations. (Applicable to the light industrial uses in PA3(a).)

m. Volume I, p. I-38, IV. Biological Resources, first row, fifth column

Mitigation Measure K-1. Impacts to nesting birds would be avoided in PA3 by conducting all construction activities outside of the bird nesting season (i.e., from September ~~4~~ 15 to February 14 for most birds, from July 1 to January ~~4~~ 1 for raptors). However, if construction activities must occur during the nesting season, the following measures shall apply:

- A. Prior to work during the bird nesting season (February 15 to ~~August 31~~ September 15 for most birds, January ~~15~~ 1 to June 31 for raptors), a qualified biologist shall conduct a pre-construction survey of all suitable habitat for the presence of nesting birds no more than 7 days prior to construction activities, including any ground-disturbing activities (e.g., staging, mobilization, grading), as well as prior to any vegetation removal within the Project Site. The results of the pre-construction survey shall be valid for 7 days; if vegetation removal activities do not commence within 7 days following the survey or if activities cease for more than 7 consecutive days, a new pre-construction nesting bird survey shall be conducted before construction resumes.
- B. If any active nests are found during a pre-construction nesting bird survey, a buffer of up to 300 feet for most bird species and 500 feet for raptors, or as determined appropriate by the qualified biologist (based on species-specific tolerances and site-specific conditions), shall be delineated, flagged, and avoided until the nesting cycle is complete (i.e., the qualified biologist determines that the young have fledged or the nest has failed). The qualified biologist may also recommend other measures to minimize disturbances to active nests that may include but are not limited to limiting the duration of certain activities, placing sound barriers (e.g., noise blankets), or visual barriers (e.g., straw bales), and/or providing full-time monitoring by a qualified biologist.
- C. As a provisional additional mitigation element, in case surveys identify burrowing owl as present on site, such occurrence shall be documented and CDFW shall be notified. Although it is considered highly unlikely that a pair of burrowing owls might attempt to nest on the site (due to disturbance, limited food resources, and presence of coyotes), if an active burrowing owl nest is encountered, a minimum buffer of 500 feet shall be delineated, flagged, and avoided by construction activity until the nesting cycle is complete (i.e., the qualified biologist determines that the young have fledged or the nest has failed). A qualified biologist may recommend other measures as noted in Item B, above. However, CDFW will be consulted prior to any reduction of avoidance buffers or implementation of other measures, such as passive relocation.

n. Volume I, pp. I-50 to I-51, XVII. Transportation, Threshold b, fifth column, Mitigation Measure C-1

Mitigation Measure C-1: A Construction Traffic Management Plan shall be developed by the contractor and approved by the City of Carson to alleviate construction period impacts, which may include but is not limited to the following measures:

- In the unlikely case that on-site truck staging areas are insufficient, provide off-site truck staging in a legal area (per the local jurisdiction’s municipal code) furnished by the construction truck contractor. Anticipated truck access to the Project Site will be off-~~Street B and Street A~~ Lenardo Drive and Stamps Drive.

- Schedule deliveries and pick-ups of construction materials during non-peak commute travel periods (e.g., early morning, midday) to the extent possible and coordinate to reduce the potential of trucks waiting to load or unload for protracted periods.
- As a vehicular travel lane, parking lane, bicycle lane, and/or sidewalk closures are anticipated, worksite traffic control plan(s), approved by the City of Carson, should be implemented to route vehicular traffic, bicyclists, and pedestrians around any such closures.
- Establish requirements for loading/unloading and storage of materials on the Project Site, including the locations where parking spaces would be affected, the length of time traffic travel lanes would be blocked, and sidewalk closures or pedestrian diversions to ensure the safety of the pedestrian and access to local businesses and residences.
- Ensure that access will remain unobstructed for land uses in proximity to the Project Site during project construction.
- Coordinate with the City and emergency service providers to ensure adequate access is maintained to the Project Site and neighboring businesses and residences.

o. Volume I, p. I-51, Mitigation Measure C-18

Mitigation Measure C-18: The PA1, PA2, and PA3 Applicant(s) shall implement a Transportation Demand Management (TDM) Program aimed at discouraging single-occupancy vehicle trips and encouraging alternative modes of transportation, such as carpooling, taking transit, walking, and biking. The TDM Program shall be subject to review and approval prior to issuance of certificate of occupancies by the City of Carson Department of Public Works subject to the requirements specified below. Mandatory strategies in the TDM Program shall include the TDM strategies summarized below. This TDM program is estimated to reduce total VMT per service population by about 2 percent based on the trip reduction methodology described in the California Air Pollution Control Officers Association (CAPCOA) *Quantifying Greenhouse Gas Mitigation Measures* report.

III.B.2 Chapter II, 2021 Project Description

a. Volume I, p. II-15, first paragraph, second sentence

... Following the transfer of the 157-Acre Site from CM LLC to the CRA in 2015, significant additional remediation work began on Cell 2 (PA2) in October 2018, but was halted in October 2019 ~~due to disagreements between the CRA and CAM regarding CAM's failure to reimburse the CRA for expenses it incurred with respect to pre-development activities on PA2 on CAM's behalf for various reasons outside the control of the City.~~ ...

b. Volume I, p. II-15, Section II.G, first paragraph, third sentence

As noted above, the previously approved 2018 Project covered PA1, PA2, and PA3 pursuant to the 2018 Specific Plan. PA1 included the provision for up to 1,250 residential units and/or commercial uses pursuant to Mixed-Use Marketplace (MU-M) zoning, which will remain the same under the 2021 Project.¹⁹ In PA2, the 2018 Project included the allowance for up to 714,000 sf of regional commercial uses and up to 15,000 sf of restaurant uses within a Commercial Marketplace (CM)

¹⁹ The "Mixed-Use Marketplace" land use category provides opportunities for the vertical or horizontal integration of housing with commercial services. MU-M does not, however, require a mix of uses and development can consist entirely of either residential or commercial uses.

zone,^{19a} which will also remain the same under the 2021 Project. The 2018 Project also analyzed PA3, which included 1,123,333 sf of regional retail, neighborhood-serving retail, restaurant, recreation/entertainment, and hospitality uses (e.g., theater, gym, hotel, etc.) within a CM zone. The only change in land uses proposed under the 2021 Project will occur within PA3.

c. Volume I, p. II-19, Table II-1, Footnote e

^e *The Carson Country Mart's 273,906 sf (6.29 acres) of total active and passive open spaces include: a 6,365 sf arrival plaza, 26,265 sf food and beverage plaza area, 22,740 sf dog park, 3,343 sf performance pavilion, 19,400 sf botanic garden, 25,400 sf children's play area, 19,490 sf bioretention garden, 1,800 sf beer garden, 2,990 sf games terrace, 35,210 sf event lawn, 2,975 sf sculpture garden, and 4,425 sf water feature and iconic element, planted open spaces and buffers, and 570 sf ~~arrival~~ area for a potential pedestrian community bridge. In addition, this area also includes 1.17 acres of planted open spaces and 1.2 acres of planted buffer areas on west and south sides of park.*

d. Volume I, p. II-23, Item (xiii) and Footnote 23

(xiii) A 570 sf ~~arrival~~ area for a connection to a potential future pedestrian community bridge;²³ and

e. Volume I, p. II-40, Section II.J.2.e, first paragraph

Electricity, natural gas, and telecommunications utilities will be installed, designed, and sized to meet the needs of the land uses proposed under the 2021 Project. The precise location will be determined upon submittal of future tract maps and will be approved by the Director of Public Works; ~~where feasible, these~~. All electrical utilities will be placed provided underground, and other utilities will also be placed underground unless such placement conflicts with the RAP.

III.B.3 Chapter III, Introduction to the Analysis

a. Volume I, p. III-2, first full paragraph

To determine whether the 2021 Project would result in any new impacts or increases in the severity of impacts that were previously disclosed in the 2006 FEIR and/or 2018 SEIR, this analysis considers the impacts that would result from construction and operation of the 2021 Project under current environmental and regulatory requirements and applicable mitigation measures. The analysis contained herein compares impacts under the 2021 Project to those identified in the 2006

^{19a} The "Commercial Marketplace" land use category includes commercial uses intended to serve a broad population base and offer a wide range of services to both the community and the region. Typical uses in this category include regional commercial uses such as outlets, major department stores and promotional retail-type stores, grocery stores and smaller neighborhood commercial retail and services uses. Additional uses include commercial recreation and entertainment uses such as movie theaters and arcades, hotels, restaurants, and highway-oriented retail and service uses. Residential uses in portions of PA 2 are permitted with the approval of an administrative permit, with CEQA review as applicable.

²³ The ~~arrival~~ area would serve a potential pedestrian bridge that is contemplated for a potential future project located at 21207 South Avalon Boulevard.

FEIR and/or 2018 SEIR and also includes implementation of ~~the 2018 SEIR~~ mitigation measures, either as adopted in the 2018 Mitigation Monitoring and Reporting Program (MMRP) and/or as revised in this 2021 SEIR, as well as new mitigation measures provided in this 2021 SEIR. With respect to Planning Area 2 (PA2), CAM-Carson LLC has vested rights to a project proposal that was approved for development by the City (following certification of the 2018 Final SEIR) pursuant to a Development Agreement between the City and CAM-Carson LLC, dated September 6, 2018; therefore, if CAM-Carson LLC pursues its project proposal, the compliance requirements for PA2 would be limited to those mitigation measures that were identified in the certified 2018 Final SEIR and associated MMRP.

III.B.4 Section IV.A, Land Use and Planning

a. Volume I, p. IV.A-11, first paragraph and Footnote 50

Separately, within the Carson Country Mart, approximately 1.59 acres would contain a pedestrian circulation system (e.g., sidewalks, public parkways, and other paths of travel), restrooms, trash and recycling areas, and the maintenance road adjacent to the Torrance Lateral. Pedestrian and bicycle pathways and exercise areas would connect the Carson Country Mart's various programmed and non-programmed areas. In addition, a 570 sf ~~arrival~~ area would be provided for a connection to a potential future pedestrian community bridge on the southeastern portion of PA3(b).⁵⁰

b. Volume I, p. IV.A-11, second paragraph

In addition, PA3(a) would include 0.62 acres of an Enhanced Parkway along the north side of Lenardo Drive that would include a 20- to ~~50~~ 40-foot-wide linear park, including shade trees and native planting; a meandering pedestrian pathway; and a sidewalk along Lenardo Drive from Main Street to the area across from the vehicular entrance for Building A, which may be used by employees of the Project Site and residents of the PA1 project. Landscaping would also be planted between the light industrial buildings and the Torrance Lateral, as well as between the light industrial buildings and all along Lenardo Drive.

c. Volume I, p. IV.A-12, last paragraph, second sentence, and Footnote 52

As with the 2018 Project, the 2021 Project is an infill development within an existing urban setting that provides a continuation of existing and intended development patterns within the City of Carson and incorporates a mix of uses and associated infrastructure, including sidewalks and bike paths connecting the Project Site to the adjacent neighborhoods. In addition, the 2021

⁵⁰ ~~The arrival~~ area would serve a potential pedestrian bridge that is contemplated for a potential future project located at 21207 South Avalon Boulevard.

Project may include a 570 sf ~~arrival~~ area for a connection to a potential future pedestrian community bridge on the southeastern portion of PA3(b).⁵² In addition, the 2021 Project provides a system of roads and sidewalks that would physically connect the Project Site, both internally (between PA1, PA2, and PA3(b)) and externally (with the community). ...

d. Volume I, p. IV.A-15, third paragraph, penultimate sentence

Privately Maintained and Publicly Accessible Open Space: The Carson Country Mart, located in PA3(b), would provide 11.12 acres of privately maintained, publicly accessible community-serving commercial use area that would include a variety of passive and active spaces, programmed areas and amenities intended to serve local City residents and to activate the area. The Carson Country Mart's 273,906 sf (6.29 acres) of total active and passive spaces are proposed to include: a 6,365 sf arrival plaza, 26,265 sf food and beverage plaza area, 22,740 sf dog park, 3,343 sf performance pavilion, 19,400 sf botanic garden, 25,400 sf children's play area, 19,490 sf bioretention garden, 1,800 sf beer garden, 2,990 sf games terrace, 35,210 sf event lawn, 2,975 sf sculpture garden, 4,425 sf water feature and iconic element, planted open spaces and buffers, and 570 sf ~~arrival~~ area to serve a potential pedestrian community bridge proposed as a component of the potential future project located at 21207 South Avalon Boulevard. In addition, this area also includes 1.17 acres of planted open spaces and 1.2 acres of planted buffer areas on west and south sides of the Carson Country Mart.

⁵² As previously noted, the ~~arrival~~ area would serve a potential pedestrian bridge that is contemplated for a potential future project located at 21207 South Avalon Boulevard.

e. Volume I, pp. IV.A-14 to IV.A-28, Table IV.A-1

**Table IV.A-1
2021 Project Consistency with City of Carson General Plan**

Relevant Policy	Analysis of Project Consistency
Land Use Element (2004)	
...	
LU-8.3 Locate higher density residential uses in proximity to commercial centers in order to encourage pedestrian traffic and provide a consumer base for commercial uses.	<p>Consistent. The 2021 Project includes the potential for high-density residential development within a mixed-use project containing up to 711,500 sf of regional commercial floor area and 33,800 sf of neighborhood serving commercial space. The 2021 Project would provide up to 1,250 residential units in PA1 at an allowed density of 60 dwelling units per acre (du/ac). Densities above 60 du/ac, and up to 80 du/ac, are authorized in PA1 with a General Plan Amendment. At these densities, the residential uses would be considered high density residential or urban residential based on the city's 2004 General Plan. The 2021 Project also includes a pedestrian circulation system throughout the Project Site connecting the various components of the 2021 Project as well as with the surrounding area from Main Street, Del Amo Boulevard, and Avalon Boulevard. In addition, the 2021 Project would include a 570 sf arrival area for a potential pedestrian community bridge that is contemplated for a cumulative project located to the south of the Project Site connecting that cumulative project to the 2021 Project. The 2021 Project would provide a development within the central part of the city at a location near the Carson Civic Center, Dignity Health Sports Park, California State University at Dominguez Hills, the SouthBay Pavilion, and Evolve South Bay, as well as nearby proposed projects, including Imperial Avalon and a mixed-use residential project on Main Street, thus contributing to the mix of uses in the area. Thus, the 2021 Project would locate residential uses in proximity of commercial uses; would provide bicycle connections within the Project Site with connections to planned bike lanes on Del Amo Boulevard, Main Street, and Avalon Boulevard consistent with the city's Master Plan of Bikeways; would provide internal pedestrian access opportunity; and would locate regional commercial space in proximity of the I-405 Freeway, thereby encouraging an enhanced consumer base for the commercial uses.</p>
...	
LU-13.1 Promote a rhythmic and ceremonial streetscape along the City's arterial roadways, continuing the use of landscaped medians.	<p>Consistent. As shown in Figure II-9, which is provided in Chapter II, <i>2021 Project Description</i>, of this 2021 SEIR, when entering the Project Site from the north, at Main Street and Lenardo Drive, the 2021 Project would include the provision of 0.62 acres of Enhanced Parkway within PA3(a) that would parallel Lenardo Drive and would include a 20- to 50 <u>40</u>-foot-wide linear park with shade trees, native planting, a meandering pedestrian pathway, and a sidewalk. Landscaping would continue along Lenardo Drive and in its medians throughout the Project Site, culminating with the open space provided in the Carson Country Mart in the southeast portion of the Project Site. Thus, the 2021 Project would contribute to the provision of landscaped medians in the city.</p>
...	

**Table IV.A-1
2021 Project Consistency with City of Carson General Plan**

Relevant Policy		Analysis of Project Consistency
City of Carson General Plan, Housing Element (2014–2021)—Policies		
...		
City of Carson General Plan, Economic Development Element (2013)—Policies		
...		
Open Space and Conservation Element		
...		
Transportation and Infrastructure Element		
<u>TI-1.1</u>	<u>Enforce the City’s revised truck route system.</u>	Not Applicable. This policy is for the City to enforce and is not applicable to development projects.
<u>TI-1.2</u>	<u>Devise strategies to protect residential neighborhoods from truck traffic.</u>	Consistent. The 2021 Project is located adjacent to the I-405 Freeway interchange, and within a few blocks of the I-405 Freeway interchange with Main Street and the I-110 Freeway interchange with Figueroa Street. Thus, proximity to nearby freeway interchanges would ensure reduced travel through residential neighborhoods and the 2021 Project would not conflict with this policy.
<u>TI-1.3</u>	<u>Ensure that the City’s designated truck routes provide efficient access to and from the I-405, I-110, and Route 91 Freeways, as well as the Alameda Corridor.</u>	Not Applicable. This policy is directed at the City and is not applicable to a development project.
<u>TI-1.4</u>	<u>Ensure that all new commercial projects have properly designed truck loading facilities.</u>	Consistent. The distribution center/fulfillment center uses within the 2021 Project include parking and loading facilities designed for heavy trucks, along with wider driveway aisles, internal roadways, and curb radii within the portion of PA3 dedicated for the distribution center/fulfillment center uses. Refer to 2021 Draft SEIR Section II.J, <i>Utilities and Infrastructure</i> , for further details on the site plan and layout.
<u>TI-1.5</u>	<u>Require that all new construction or reconstruction of streets or corridors that are designated as truck routes accommodate projected truck volumes and weights.</u>	Consistent. Streets within the Project Site would be designed to accommodate the truck volumes and weights of the trucks that would access the distribution center/fulfillment center uses within PA3(a). Design plans would be reviewed by the City to ensure consistency with applicable design standards and code requirements.
<u>TI-2.7</u>	<u>Provide all residential, commercial and industrial areas with efficient and safe access to major regional transportation facilities.</u>	Consistent. As indicated in the 2021 Draft SEIR, the 2021 Project is located in close proximity to the I-405 Freeway interchange with Avalon Boulevard and within a few blocks of the I-405 Freeway interchange with Main Street and the I-110 Freeway interchange with Figueroa Street, which allows for quick, safe and easy access to and from the regional transportation system. Thus, the 2021 Project, as with the 2018 Project, would provide efficient and safe access to major regional transportation facilities for residential, commercial, and industrial uses within the Project Site.

**Table IV.A-1
2021 Project Consistency with City of Carson General Plan**

Relevant Policy	Analysis of Project Consistency
<p><u>TI-5.1</u> <u>Ensure that Transportation Demand Management (TDM) policies are considered during the evaluation of new developments within the City, including but not limited to: ridesharing, carpooling and vanpooling, flexible work schedules, telecommuting and car/vanpool preferential parking.</u></p>	<p>Consistent. <u>Mitigation Measure C-18 requires that the PA1, PA2, and PA3 applicants implement a Transportation Demand Management (TDM) that aims at discouraging single-occupancy vehicle trips and encouraging alternative modes of transportation, such as carpooling, using public transit, walking and biking. Refer to 2021 Draft SEIR Section IV.C.6.b, <i>Mitigation for VMT Impact</i>, for specifics.</u></p>
<p><u>TI-6.3</u> <u>Ensure that new roadway links are constructed as designated in the Circulation Element, and link with existing roadways in neighboring jurisdictions in order to allow efficient access into and out of the City.</u></p>	<p>Consistent. <u>The 2021 Project's internal roadways Stamps Drive and Lenardo Drive will connect the Project Site to the existing roadways consistent with the Transportation and Infrastructure Element in effect at the time of the certification of the SEIR. The 2021 Project would create efficient access into and out of the Project Site connected to the roadways in the vicinity and to neighboring jurisdictions. Refer to 2021 Draft SEIR Section II.J, <i>Utilities and Infrastructure</i>, for further details on the site plan and layout.</u></p>
<p><u>TI-7.1</u> <u>Provide landscaped medians and greenbelts along major arterials, when economically feasible.</u></p>	<p>Consistent. <u>The 2021 Project's internal roadways Stamps Drive and Lenardo Drive will include landscaped medians. Refer to 2021 Draft SEIR Section II.J, <i>Utilities and Infrastructure</i>, for further details on the site plan and layout.</u></p>

SOURCE: ESA 2021.

^a City of Carson, Community Facilities District Report – Community Facilities District No. 2012-2 of the City of Carson (The Boulevard at South Bay – Capital Improvements), September 12, 2012.

^b There are two annual CFD fees that would be applicable to the 2021 Project to support infrastructure improvement on and off site. The Citywide CFD funds support Citywide sheriff services; street sweeping; sidewalk cleaning and maintenance; maintenance of parkways and open space; maintenance of roadways; and flood and storm protection services. CFD No. 2012-2, as amended or modified from time to time, supports public on-site and/or off-site improvements related to potential impacts specifically occurring as a result of the 2021 Project, including street facilities; storm control facilities; sewer improvements; domestic water facilities; Sanitation District facilities; park, recreational, and open space facilities; school facilities; fire facilities; and library facilities.

f. Volume I, p. IV.A-29, second full paragraph, first sentence

The 2021 Project would provide approximately 0.62 acres of Enhanced Parkway along the south side of Lenardo Drive that would include a 20- to ~~50~~ 40-foot-wide linear park including shade trees, native planting, a meandering pedestrian pathway, and a sidewalk from Main Street to the area across from the vehicular entrance for Building A within PA3(a). ...

g. Volume I, p. IV.A-33, Table IV.A-2, Item 6, second column

Consistent. The 2021 Project includes the provision for pedestrian and bicycle transit within the Project Site with connections to the surrounding neighborhood and with nearby public transit routes. In addition, 0.62 acres of Enhanced Parkway would be provided on the north side of Lenardo Drive, just east of Main Street to the west of the light industrial uses on PA3(a). A meandering pedestrian pathway would be provided within the 20- to ~~50~~ 40-foot linear park, which would provide a comfortable and safe walking opportunity for residents of PA1. In addition, the 2021 Project includes 11.12 acres of community serving

commercial uses within an activated green environment within PA3(b) which would include a variety of passive and active open spaces, programmed areas and amenities including tables and seating areas, botanic garden, children's play area, bioretention garden, beer garden, games terrace, event lawn and a sculpture garden as well as restrooms, walkways, planted spaces, and planted buffers. This area would provide nearby residents both on and off site the opportunity to spend time outdoors and to walk, thereby promoting a healthier and more active lifestyle. The 2021 Project would provide regional and neighborhood-serving commercial uses, which would be easily accessible to Project residents and residents of the surrounding neighborhoods.

h. Volume I, p. IV.A-35, first full paragraph, last sentence

The 711,500 sf of regional commercial uses within PA2 as well as the 33,800 sf of neighborhood commercial uses within PA3(b) would contribute to the mix of uses in the area and would provide a regional destination. In addition, as indicated above, pedestrian access would be provided from the residential units within PA1 to the commercial uses within PA2 and PA3(b). As shown in Figure II-9, PA3(a) would include 0.62 acres of Enhanced Parkway on the south side of Lenardo Drive. A meandering pedestrian pathway would be provided within the 20- to ~~50~~ 40-foot-wide linear park, which would provide an outdoor walking opportunity for residents of PA1 within the Project Site.

III.B.5 Section IV.B, Aesthetics

a. Volume I, p. IV.B-25, preceding last bullet

- 2021 SEIR PDF-A4: On PA3, vegetation and tree canopy along project perimeter near offsite residents adjacent to project area shall be improved and maintained. Trees should be selected by a registered arborist as appropriate for the location. Tree canopy coverage along the perimeter shall have a width of at least 20 feet with continuous unbroken coverage within 5 years subject to any limitations posed by the underlying geotechnical conditions or the specimen requirements, or other limitations, in the Specific Plan.

b. Volume I, p. IV.B-39, Mitigation Measure B-4, last bullet

- Signage. A comprehensive sign program shall be prepared for each Planning Area that provides the final design, size, location, and illuminance of signage within a Planning Area. As part of the application submittal for the comprehensive sign program, if necessary, a technical lighting study shall be prepared to ensure that the proposed signs comply with Mitigation Measures B-3a and B-3b regarding illuminance, and that no spillover or adverse effects to adjacent residential uses shall occur.

III.B.6 Section IV.C, Transportation

a. Volume I, p. IV.C-4, Footnote 75

⁷⁵ Policy ~~TI-2.7~~ TI-2.1, though related to transportation, is no longer relevant to the CEQA analysis since its focus is on intersection LOS. SB 743 specifically removes LOS analysis from the assessment of potential transportation impacts.

b. Volume I, p. IV.C-10, Section IV.C.5.c(1), second paragraph

The 2021 Project is located adjacent to freeway interchanges and along truck routes to ensure reduced travel on local streets not designated as truck routes. ~~As part of the 2021 Specific Plan Amendment, the portion of Avalon Boulevard near the I-405 Freeway interchange will be designated as a truck route to allow direct heavy truck access between the freeway and the Project Site.~~

c. Volume I, p. IV.C-13, Mitigation Measure C-1

Mitigation Measure C-1: A Construction Traffic Management Plan shall be developed by the contractor and approved by the City of Carson to alleviate construction period impacts, which may include but is not limited to the following measures:

- In the unlikely case that on-site truck staging areas are insufficient, provide off-site truck staging in a legal area (per the local jurisdiction’s municipal code) furnished by the construction truck contractor. Anticipated truck access to the Project sSite will be off-~~Street B and Street A~~ Lenardo Drive and Stamps Drive.
- Schedule deliveries and pick-ups of construction materials during non-peak commute travel periods (e.g., early morning, midday) to the extent possible and coordinate to reduce the potential of trucks waiting to load or unload for protracted periods.
- As a vehicular travel lane, parking lane, bicycle lane, and/or sidewalk closures are anticipated, worksite traffic control plan(s), approved by the City of Carson, should be implemented to route vehicular traffic, bicyclists, and pedestrians around any such closures.
- Establish requirements for loading/unloading and storage of materials on the Project sSite, including the locations where parking spaces would be affected, the length of time traffic travel lanes would be blocked, and sidewalk closures or pedestrian diversions to ensure the safety of the pedestrian and access to local businesses and residences.
- Ensure that access will remain unobstructed for land uses in proximity to the Project sSite during project construction.
- Coordinate with the City and emergency service providers to ensure adequate access is maintained to the Project sSite and neighboring businesses and residences.

d. Volume I, p. IV.C-17, Mitigation Measure C-18

Mitigation Measure C-18: The PA1, PA2, and PA3 Applicant(s) shall implement a Transportation Demand Management (TDM) Program aimed at discouraging single-occupancy vehicle trips and encouraging alternative modes of transportation,

such as carpooling, taking transit, walking, and biking. The TDM Program shall be subject to review and approval prior to issuance of certificate of occupancies by the City of Carson Department of Public Works subject to the requirements specified below. Mandatory strategies in the TDM Program shall include the TDM strategies summarized below. This TDM program is estimated to reduce total VMT per service population by about 2 percent based on the trip reduction methodology described in the California Air Pollution Control Officers Association (CAPCOA) *Quantifying Greenhouse Gas Mitigation Measures* report.

III.B.7 Section IV.D, Air Quality

a. Volume I, p. IV.D-34, Section IV.D.5.a(4)(d)(i), first paragraph, fifth sentence

Dispersion modeling was performed using the USEPA-approved AERMOD with meteorological data from the representative SCAQMD monitoring station located in South Coastal County LA (Long Beach). SCAQMD specifically recommends that projects use the nearest representative SCAQMD meteorological station for modeling, which is usually the nearest station; however, an interfering terrain feature may dictate the use of an alternate station. Emissions sources were located on the Project Site corresponding to the areas of construction activity. For example, while grading would occur over the whole 157-Acre Site, building construction and architectural coating activities would be isolated to areas of the site where buildings would be located. Multiple volume sources were used to represent the construction emissions sources and truck access routes on the Project Site projected by the 2021 Project. ...

b. Volume I, p. IV.D-38, 2021 SEIR PDF-C1

- **2021 SEIR PDF-C1:** Mobile off-road construction equipment (wheeled or tracked) and all diesel-fueled off-road construction equipment used during construction of the 2021 Project shall meet the USEPA Tier 4 final standards, either as original equipment or equipment retrofitted to meet the Tier 4 final standards. In the event of specialized equipment use where Tier 4 equipment is not commercially available at the time of construction, then the equipment shall, at a minimum, meet the Tier 3 standard. Zero-emissions construction equipment shall be incorporated when commercially available at no more than a 30 percent price differential compared to non-zero-emissions equipment. For purposes of this project design feature, “commercially available” is defined as equipment built by the original manufacturer and available for lease or hire within 20 miles of the City of Carson and available in a similar timeframe to fossil-fueled options. If Tier 4 Final engine equipment or zero-emissions equipment is not commercially available, the contractor must show proof that the equipment is not commercially available by providing letters from at least two independent rental companies, each of which must own or operate a construction equipment fleet with total maximum horsepower of greater than 2,500 horsepower, for each piece of off-road equipment where the Tier 4 Final engine or zero-emissions equipment is not available.

This requirement shall be incorporated into applicable bid documents, purchase orders, and contracts with successful contractors demonstrating 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 shall be available upon request at the time of mobilization of each applicable unit of equipment. (Modified from 2018 SEIR PDF Mitigation Measure G-6) (Applicable to PA1, PA2, and PA3; ~~zero-emissions construction equipment use is not required for PA2.~~)

c. Volume I, p. IV.D-39, 2021 SEIR PDF-C2 and PDF-C3

- **2021 SEIR PDF-C2:** Limiting excavations to avoid exposing landfill contents. (~~2018 SEIR PDF~~) (Applicable to PA1, PA2, and PA3.)
- **2021 SEIR PDF-C3:** General contractors shall implement a fugitive dust control program pursuant to the provisions of SCAQMD Rule 403. Grading in PA1 and PA3 shall be prohibited on days when SCAQMD Air Quality Index Forecast exceed 100 for particulates or ozone for the Project Site. (Modified from 2018 SEIR Mitigation Measure G-1)¹¹⁴ (Applicable to PA1, PA2, and PA3.)

d. Volume I, p. IV.D-39, 2021 SEIR PDF-C4, PDF-C5, and PDF-C6

- **2021 SEIR PDF-C4:** Electricity from power poles Electric hook-ups to the power grid or battery power shall be used rather than temporary diesel- or gasoline-powered generators shall be used to the extent for electric construction tools, such as saws, drills, and compressors, whenever feasible. For PA3 and PA1, mobile off-road construction equipment of less than 50 horsepower shall be electric. including: air compressors, concrete/industrial saws, welders and plate compactors. Mobile off-road construction equipment with a power rating of 19 kilowatts or less shall be battery powered. If generators need to be used to reach remote portions of the site, non-diesel generators shall be used. (Modified from 2018 SEIR Mitigation Measure G-4)¹¹⁵ (Applicable to PA1, PA2, and PA3.)
- **2021 SEIR PDF-C5:** All construction vehicles shall be prohibited from idling in excess of 5 minutes per occurrence and location, both on and off Property site. (Applicable to PA2.) All construction vehicles shall be prohibited from idling in excess of 2 minutes per occurrence and location, both on and off site. Individual pieces of diesel-powered off-road diesel equipment shall be prohibited from being in the “on” position for more than 10 hours per day. (Modified from 2018 SEIR Mitigation Measure G-5)¹¹⁶ (Applicable to PA1 and PA3.)

¹¹⁴ SCAQMD Rule 403 requirements are regulations that are part of the unmitigated modeling scenario; therefore, this mitigation measure is now 2021 SEIR PDF-C3.

¹¹⁵ Mitigation Measure G-4 was replaced by 2021 SEIR PDF-C4 as it is a quantified part of the unmitigated modeling scenario.

¹¹⁶ Mitigation Measure G-5 was replaced by 2021 SEIR PDF-C5 as it is a quantified part of the unmitigated modeling scenario.

- **2021 SEIR PDF-C6:** All fleet-contracted on-road heavy-duty haul trucks used for remediation and construction hauling activities from PA1 and PA3 shall be model year 2014 or newer if diesel fueled. The requirement for the use of 2014 or newer vehicles does not apply to delivery trucks or other non-contracted fleets. (Applicable to PA1, PA2, and PA3.)

e. Volume I, pp. IV.D-39 and IV.D-40, 2021 SEIR PDF-C7 and PDF-C8

- **2021 SEIR PDF-C7:** Contractors shall conduct routine inspections (at least once per calendar week during active construction) to verify compliance with construction mitigation and to identify other opportunities to further reduce construction impacts. Inspection reports shall be maintained on site throughout the construction period. (Applicable to PA1, PA2, and PA3.)
- **2021 SEIR PDF-C8:** 2021 Project contractors shall provide information on transit and ride sharing programs and services to construction employees. As feasible can be safely accommodated (at the sole discretion of the construction Site Supervisor), provide for meal options on site, or shuttle buses between the site and nearby meal destinations for use by construction contractors. (Applicable to PA1, PA2, and PA3.)
- **2021 SEIR PDF-C9:** During construction, the amount of daily grading disturbance area shall be limited to 10 acres (excluding remediation activities). (Applicable to PA3.)

f. Volume I, p. IV.D-40, 2021 SEIR PDF-O1 and PDF-O2

- **2021 SEIR PDF-O1:** The proposed modified-2021 Project would include an impervious barrier to control odiferous and air toxic emissions in compliance with the approved RAP. (~~2018 SEIR PDF~~) (Applicable to PA1, PA2, and PA3.)
- **2021 SEIR PDF-O2:** All stationary-source emissions sources (e.g., landfill gas flares, emergency generator) would utilize Best Available Control Technology (BACT) to meet SCAQMD requirements, and would maintain appropriate SCAQMD permits. (~~2018 SEIR PDF~~) (Applicable to PA1, PA2, and PA3.)

g. Volume I, p. IV.D-41, 2021 SEIR PDF-O4 and PDF-O5

- **2021 SEIR PDF-O4:** All residential and non-residential buildings shall meet or exceed the more stringent of the 2016-2019 California Title 24 Efficiency standards for water, heating, space heating, and cooling, by a minimum of 5 percent or achieve equivalent energy efficiency savings by other means or others adopted by the City. (Modified from 2018 SEIR Mitigation Measure G-15)¹¹⁸ (Applicable to PA1, PA2, and PA3; ~~PA2 applicability is limited to the Title 24 efficiency standards effective at the time construction began.~~)

¹¹⁸ This measure was replaced by 2021 SEIR PDF-O7 as it is a regulatory requirement modeled as part of the unmitigated scenario.

- **2021 SEIR PDF-O5:** The ~~Developer~~ Applicant(s) of each planning area within the Project Site shall implement the following trip demand measures:
 - a) ~~The Applicant shall p~~Provide bicycle racks located at convenient locations throughout ~~The District at South Bay~~ the 2021 Project. (Modified from 2018 SEIR Mitigation Measure G-22)¹¹⁹ (Applicable to PA1, PA2, and PA3.)
 - b) ~~The Applicant shall p~~Provide bicycle paths along the main routes throughout ~~The District at South Bay~~ the Project Site consistent with the 2021 Specific Plan Amendment. (Modified from 2018 SEIR Mitigation Measure G-23)¹²⁰ (Applicable to PA1, PA2, and PA3.)
 - c) ~~The Applicant shall p~~Provide convenient pedestrian access throughout ~~The District at South Bay~~ the Project Site. (Modified from 2018 SEIR Mitigation Measure G-24)¹²¹ (Applicable to PA1, PA2, and PA3.)
 - d) Provide on-site shower facilities for use by all employees bicycling/walking to work. (Applicable to the light industrial uses in PA3(a).)
 - e) Light industrial tenants shall provide preferential parking for employees using vehicles displaying valid “clean air vehicles” decals issued by the California Department of Motor Vehicles. Percentage of parking to be allotted by facility shall be governed by City or CALGreen standards. (Applicable to the light industrial uses in PA3(a).)
 - f) Each light industrial tenant within PA3(a) shall be responsible for having a designated coordinator to oversee a carpool match or other ride-share program for the facility. To the extent feasible, the programs for all tenants shall be interlinked to provide expanded resources for ride-share/carpool opportunities. (Applicable to the light industrial uses in PA3(a).)

h. Volume I, p. IV.D-42, following Item d

- d) Provide infrastructure, as the parking area is developed, to support the energy load for electric truck vehicle charging. Truck charging infrastructure shall be designed to support a minimum of 25 percent of the truck parking spaces for each of the light industrial use in PA3(a). (Applicable to the uses in PA3(a).)
- e) Meet CALGreen Tier 2 green building standards, including all provisions related to designated parking for clean air vehicles, electric vehicle charging, and bicycle parking. (Applicable to the light industrial uses in PA3.)

¹¹⁹ 2018 Mitigation Measure G-22 was moved to the 2021 SEIR PDF section because bicycle and pedestrian pathways are part of the 2021 Project Description; therefore, bicycle parking would be part of the 2021 Project to accommodate bicycle access.

¹²⁰ 2018 Mitigation Measure G-23 was moved to the 2021 SEIR PDF section because bicycle and pedestrian pathways are part of the 2021 Project Description.

¹²¹ 2018 Mitigation Measure G-24 was moved to the 2021 SEIR PDF section because bicycle and pedestrian pathways are part of the 2021 Project Description.

i. Volume I, p. IV.D-42, 2021 SEIR PDF-09

- **2021 SEIR PDF-09:** When not in use all truck engines shall be turned off. Idling will be limited to 2 minutes or less per occurrence and location for PA3. Idling and operation restrictions shall be posted for view from both on-site and off-site personnel. Appropriate signage shall identify idling restrictions and contact information to report violations to CARB and SCAQMD within PA3. Consistent with the 2018 SEIR, idling restrictions of 5 minutes or less per occurrence and location are applicable to PA1 and PA2. (Applicable to P1, PA2, and PA3.)

j. Volume I, p. IV.D-42, 2021 SEIR PDF-012

- **2021 SEIR PDF-012:** Restrict queuing on public streets where there are sensitive air quality receptors (e.g., residential or recreation related uses). Restrict queuing on public streets where there are sensitive air quality receptors (e.g., residential or recreation related uses). Tenants shall train managers and employees on efficient scheduling and load management to eliminate unnecessary queuing and idling of trucks. Staff in charge of keeping vehicle records shall be trained in diesel technologies and compliance with CARB regulations by attending CARB-approved courses as well as maintaining on-site records demonstrating compliance. (Applicable to uses in PA3(a).)

k. Volume I, p. IV.D-43, 2021 SEIR PDF-015 and PDF-016

- **2021 SEIR PDF-015:** All light industrial buildings shall implement a combination of sky lights and solar photovoltaic (PV) infrastructure such that a minimum of 25 percent of the rooftops will include solar PV arrays at buildout. In addition, 25 percent of the rooftops not otherwise covered with solar shall be structurally designed and installed to accommodate solar in the future. (Applicable to uses in PA3(a).)
- **2021 SEIR PDF-016:** For the uses within PA3(a), leasing preference shall be given to prospective tenants with a facility-owned and operated fleet that is alternative/zero-emissions. ~~All owned or contracted fleets.~~ At a minimum, warehouse tenants/owners and/or operators shall ensure that all truck fleets accessing the 2021 Project's light industrial uses shall meet or exceed the 2014 model-year emissions equivalent engine standards as currently defined in California Code of Regulations Title 13, Division 3, Chapter 1, Article 4.5, Section 2025. Light Industrial tenants shall ensure that of all trucks of model year 2021 and newer 75 percent will be zero- or near-zero-emissions vehicles by 2035, and 100 percent zero- or near-zero-emissions vehicles by 2040. Facility operators shall maintain records on site demonstrating compliance with this requirement and shall make records available to inspection by local jurisdiction, air districts, and the State upon request. (Applicable to the uses in PA3(a).)
- **2021 SEIR PDF-017:** For the uses within PA3(a), building structures, walls or vegetation between the dock doors/truck loading areas and any sensitive receptors located within 1,000 feet of the loading areas shall be installed. (Applicable to the light industrial uses in PA3(a).)
- **2021 SEIR PDF-018:** For the uses within PA3(a), the following signage shall be posted:

- a) Both interior- and exterior-facing signs shall be posted, including signs directed at all dock and delivery areas, identifying idling restrictions and contact information to report violations to CARB, SCAQMD, and the building manager. (Applicable to PA3(a).)
- b) Signage shall be posted that clearly identifies the designated entry and exit points from the public street for trucks and service vehicles in order to minimize entrances directly adjacent to sensitive receptors. (Applicable to PA3(a).)
- c) Signage shall be posted indicating that all parking and maintenance of trucks must be within designated on-site areas and not within surrounding community or public streets. (Applicable to PA3(a).)
- **2021 SEIR PDF-O19:** For the uses within PA3, cool pavement shall be used to the maximum extent feasible unless prevented by geotechnical conditions associated with the existing landfill. (Applicable to the light industrial uses in PA3.)
- **2021 SEIR PDF-O20:** For the uses within PA3(a), PA3(a) employees shall be provided dining options onsite or shuttle service shall be provided between the facility and nearby dining destinations. (Applicable to the light industrial uses in PA3(a).)

l. Volume I, p. IV.D-48, last paragraph, last sentence

... With respect to reducing emissions from heavy-duty trucks within neighborhoods, the 2021 Project will reduce emissions by (1) implementing a phase-in of zero-emissions vehicles by 2040; (2) increase in EV charging stations beyond existing regulatory obligations and incorporating electrical infrastructure to support potential future truck EV charging stations; (3) banning the use of diesel TRUs within PA3; (4) by locating industrial facilities close to the intersection of two major freeways, it limits the distance along collector streets that the trucks proposed by the 2021 Project will have to travel to access freeways and leave the neighborhoods; and (5) implementing signage on site to direct trucks to appropriate truck access routes.

m. Volume I, p. IV.D-49, first paragraph, fourth sentence

The CERP identifies four actions to reduce impacts to schools, childcare centers, and homes including: reducing exposure through public outreach to schools and childcare centers, reduce exposure to harmful air pollutants at schools, reduce exposures to harmful air pollutants at homes; and increase green space in areas where people spend time. ... The 2021 Project is located adjacent to freeway interchanges ~~and along truck routes~~ to ensure ~~that trucks do not need to~~ reduced travel on local streets not designated as truck routes. ...

n. Volume I, p. IV.D-49, following first paragraph, new Table IV.D-5a

Table IV.D-5a, 2021 Project Consistency with CERP, summarizes the 2021 Project’s general consistency with the CERP.

Table IV.D-5a
2021 Project Consistency with CERP [New]

<u>Community Air Quality Priorities^a</u>	
<u>Policies</u>	<u>Project Consistency</u>
<u>Increased enforcement of CARB’s Truck and Bus and Idling Rules to reduce diesel emissions (including during non-business hours)</u>	<u>Consistent.</u> The 2021 Project would implement 2021 SEIR PDF-09 to include signage with idling restrictions and contact information to report violations to CARB and SCAQMD. The 2021 Project would also implement 2021 SEIR PDF-012 to require staff in charge of keeping vehicle records to attend CARB-approved courses and to maintain on-site records demonstrating compliance.
<u>Accountability for truck owners and truck drivers, when trucks violate CARB idling regulations</u>	<u>Consistent.</u> See above.
<u>Additional outreach to commercial fleets, warehouses, and other facilities that operate heavy-duty diesel trucks and additional incentives for truck retrofits or truck replacements with zero-emission technologies once they become feasible, and near-zero technologies until that time</u>	<u>Consistent.</u> The 2021 Project would implement a phase-in of ZE vehicles by 2040, will increase EV charging stations beyond applicable regulatory obligations, and incorporate electrical infrastructure to support potential future ZE truck technology. As stated in 2021 SEIR PDF-010, the 2021 Project would also require plug-in TRUs within PA3(a). Further, as stated in 2021 SEIR PDF-016, light industrial tenants shall ensure that of all trucks of model year 2021 and newer 75 percent will be ZE or NZE vehicles by 2035, and 100 percent ZE or NZE vehicles by 2040.
<u>Evaluate designated truck routes</u>	<u>Consistent.</u> The 2021 Project is located adjacent to the I-405 Freeway interchange, and within a few blocks of the I-405 Freeway interchange with Main Street and the I-110 Freeway interchange with Figueroa Street. Thus, proximity to nearby freeway interchanges would ensure reduced travel through residential neighborhoods. Further, as noted on 2021 Draft EIR p. IV.D-48 and in the 2022 District at South Bay Specific Plan, signage will be implemented on site to direct trucks to appropriate truck routes.
<u>Improving the complaint systems designed to report illegal truck idling or truck travel on local roadways</u>	<u>Consistent</u> As noted above, 2021 SEIR PDF-09 requires the provision of signage to indicate idling restrictions and contact information to report violations of idling restrictions to CARB and SCAQMD. As noted on 2021 Draft EIR p. IV.D-48 and in the 2022 District at South Bay Specific Plan, signage will be implemented on site to direct trucks to appropriate truck routes.
<u>New regulations that require the use of zero-emission trucks as soon as they become available</u>	<u>Consistent.</u> As stated above, 2021 SEIR PDF-016 mandates that ZE and NZE trucks be used on site in future key years. This is more stringent than CARB’s Advanced Clean Truck Rule (see below), which only applies to truck manufacturers, phasing out the sales of diesel medium- and heavy-duty trucks and requiring they sell ZE and NZE trucks at targeted rates in future year. Diesel trucks may remain in the statewide inventory, operating legally, for many years or decades after the target years in CARB’s ACT regulations.

**Table IV.D-5a
2021 Project Consistency with CERP [New]**

Upcoming Rule Development/Activities from U.S. EPA, CARB, and the Ports (as of 2019)^b				
<u>Agency</u>	<u>Upcoming Action</u>	<u>Expected Decision</u>	<u>Expected Phase-In Period</u>	<u>2021 Project's Anticipated Implementation Strategy</u>
<u>U.S. EPA</u>	<u>Cleaner Truck Initiative – In response to a petition from SCAQMD, U.S. EPA has committed to updating its truck engine standard to reduce NO_x emissions.</u>	<u>2020–2021</u>	<u>2024</u>	<u>The 2021 Project would implement 2021 SEIR PDF-C6, which requires that all fleet-contracted on-road heavy-duty haul trucks used for remediation and construction hauling activities from PA1 and PA3 shall be model year 2014 or newer if diesel fueled.</u>
<u>CARB</u>	<u>Transport Refrigeration Unit Regulation – Measure to reduce residual risk from TRUs by transitioning to ZE technologies.</u>	<u>2019</u>	<u>2025–2030</u>	<u>The 2021 Project would require the use of plug-in electric TRUs in PA3(a) as detailed in 2021 SEIR PDF-O10.</u>
<u>CARB</u>	<u>Drayage Truck Rule – Updated regulation to transition to ZE trucks.</u>	<u>2022</u>	<u>2026</u>	<u>2021 SEIR PDF-O16 requires the early adoption of ZE and NZE trucks throughout PA3(a).</u>
<u>CARB</u>	<u>Advanced Clean Truck Rule – Requires truck manufacturers to sell an increasing percentage of ZE trucks by 2030 (up to 15% or 50%, depending on truck type). Also will require one-time fleet reporting for large businesses.</u>	<u>2019</u>	<u>2024–2030</u>	<u>Deliveries to the 2021 Project would be made by trucks subject to the Advanced Clean Truck Rule. In addition, 2021 SEIR PDF-O16 requires the early adoption of ZE and NZE trucks throughout PA3(a).</u>
<u>CARB</u>	<u>Zero-Emission Fleet Rule – Would require fleets to transition to zero-emissions.</u>	<u>2022</u>	<u>2024</u>	<u>2021 SEIR PDF-O16 requires the early adoption of ZE and NZE trucks throughout PA3(a).</u>
<u>CARB</u>	<u>Heavy-Duty Low NOX Rule – Would set new statewide engine standards for NOX reduction from trucks by 2026, and additional reductions including and after 2027.</u>	<u>2020</u>	<u>2024</u>	<u>2021 SEIR PDF-O16 requires that the Light Industrial tenants shall ensure that of all trucks of model year 2021 and newer 75 percent will be ZE or NZE vehicles by 2035, and 100 percent ZE or NZE vehicles by 2040.</u>
<u>Ports</u>	<u>Clean Truck Program – Will establish a rate that trucks need to pay to enter the Ports beginning in 2020 if they are not NZE. Only ZE trucks will be exempt from payment of the rate by 2035.</u>	<u>2019</u>	<u>2020–2035</u>	<u>N/A</u>
South Coast AQMD Efforts^c				
	<u>Action 1: Reduce Truck Idling</u>		<u>See above.</u>	
	<u>Action 2: Reduce Emissions from Heavy-Duty Trucks</u>		<u>See above.</u>	

Table IV.D-5a
2021 Project Consistency with CERP [New]

NOTES:

CARB = California Air Resources Board; SCAQMD = South Coast Air Quality Management District; ZEV = zero-emissions vehicle; EV = electric vehicle; ZE = zero-emissions; TRU = transportation refrigeration units; NZE = near-zero-emissions; ACT = Advanced Clean Trucks

^a South Coast Air Quality Management District, Community Emissions Reduction Plan for Wilmington, Carson, West Long Beach, September 2019, <https://www.aqmd.gov/docs/default-source/ab-617-ab-134/steering-committees/wilmington/cerp/final-cerp-wcwlb.pdf?sfvrsn=8>, p. 5d-1

^b Ibid, Table 5d-1

^c Ibid, pp. 5d-4 through 5d-9

o. Volume I, p. IV.D-52, Table IV.D-7

Table IV.D-7
2021 Project Regional Operational Emissions (Unmitigated) (lbs/day)

	VOC	NOx	CO	SOx	PM10	PM2.5
Maximum Daily Emissions (Year 2026)						
Area	83	20	112	<1	2	2
Energy	1	7	4	<1	1	1
Mobile	130	476	1,182	5	461	129
<u>TRU</u>	<u><1</u>	<u><1</u>	<u><1</u>	<u><1</u>	<u><1</u>	<u><1</u>
Stationary ^a	4	5	37	<1	1	1
Total 2021 Project	218	508	1,335	6	465	132
SCAQMD Significance Threshold	55	55	550	150	150	55
Significant?	Yes	Yes	Yes	No	Yes	Yes
2018 SEIR	193	578	1,633	9	384	113
<i>Difference (2021 Project minus 2018 SEIR)</i>	25	(70)	(298)	(3)	81	19
Maximum Daily Emissions (2035)						
Area	83	20	112	<1	2	2
Energy	1	7	4	<1	1	1
Mobile	83	293	892	4	460	127
<u>TRU</u>	<u><1</u>	<u><1</u>	<u><1</u>	<u><1</u>	<u><1</u>	<u><1</u>
Stationary ^a	4	5	37	<1	1	1
Total 2021 Project	171	325	1,045	4	463	130
SCAQMD Significance Threshold	55	55	55	150	55	55
Significant?	Yes	Yes	Yes	No	Yes	Yes
2018 SEIR	193	578	1,633	9	384	113
<i>Difference (2021 Project minus 2018 SEIR)</i>	(22)	(253)	(588)	(4)	80	18

**Table IV.D-7
2021 Project Regional Operational Emissions (Unmitigated) (lbs/day)**

	VOC	NO _x	CO	SO _x	PM10	PM2.5
Maximum Daily Emissions (2040)						
Area	83	20	112	<1	2	2
Energy	1	7	4	<1	1	1
Mobile	67	169	803	3	459	126
<u>TRU</u>	<u><1</u>	<u><1</u>	<u><1</u>	<u><1</u>	<u><1</u>	<u><1</u>
Stationary ^a	4	5	37	<1	1	1
Total 2021 Project	155	201	956	4	463	130
SCAQMD Significance Threshold	55	55	550	150	150	55
Significant?	Yes	Yes	Yes	No	Yes	Yes
2018 SEIR	193	578	1,633	9	384	113
<i>Difference (2021 Project minus 2018 SEIR)</i>	<i>(38)</i>	<i>(377)</i>	<i>(677)</i>	<i>(5)</i>	<i>79</i>	<i>17</i>

SOURCE: ESA 2021.

NOTES:

Emissions quantities are rounded to "whole number" values. As such, the "total" values presented herein may be one unit more or less than actual values. Exact values (i.e., non-rounded) are provided in the CalEEMod model printout sheets and/or calculation worksheets that are presented in Appendix D1 of this 2021 SEIR.

^a Emissions due to Stationary Sources are from the operation of the on-site flare system, LGCCS, and Condensate System.

p. Volume I, p. IV.D-56, Table IV.D-9

**Table IV.D-9
2021 Project Localized Construction Emissions (Unmitigated)**

	NO _x	CO	PM ₁₀ ^a	PM _{2.5} ^a
Maximum Daily Emissions (LST Screening Analysis) (lbs/day)^b				
PA1	22	109	5	3
PA2	21	114	6	3
PA3	21	86	5	3
Maximum Daily (with overlapping phases)	52	310	14	7
SCAQMD Daily Screening Threshold	68	1,530	14	8
Potentially Significant?	No	No	Yes^c	No
2018 SEIR	66	627	49	18
<i>Difference (2021 Project minus 2018 SEIR)</i>	<i>(14)</i>	<i>(317)</i>	<i>(35)</i>	<i>(11)</i>
	NO₂	CO	PM₁₀	PM_{2.5}

Maximum Daily Concentration (Dispersion Modeling) ($\mu\text{g}/\text{m}^3$)^d				
Maximum Daily Impact (1-hour Highest)	469 <u>183</u>	—	—	—
Threshold	339	—	—	—
Maximum Daily Impact (1-hour 8th Highest)	434 <u>135</u>	—	—	—
Threshold	188	—	—	—
Maximum Daily Impact (24 hour)	—	—	1.98	—
Threshold	—	—	10.4	—
Maximum Daily Impact (Annual)	333 <u>35</u>	—	0.57	0.8
Threshold	57	—	1	10.4
Significant?	No	—	No	No
2018 SEIR (24 hour)	—	—	5	1.8
<i>Difference (2021 Project minus 2018 SEIR)</i>	—	—	(3)	(1)

SOURCE: ESA 2021.

NOTES:

Emissions quantities are rounded to “whole number” values. As such, the “total” values presented herein may be one unit more or less than actual values. Exact values (i.e., non-rounded) are provided in the CalEEMod model printout sheets and/or calculation worksheets that are presented in Appendix D1 of this 2021 SEIR.

- ^a PM10 emissions estimates are based on compliance with SCAQMD Rule 403 requirements for fugitive dust suppression, which require that no visible dust be present beyond the Project Site boundaries.
- ^b LST Screening Analysis and Screening thresholds are based on SCAQMD mass look-up screening levels for SRA 4 and conservatively assuming 5 acres of disturbance daily with sensitive receptors located within 25 meters of the Project Site. Mass look-up screening levels are based on allowable maximum emissions that would not cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standard, which is developed based on ambient concentrations of that pollutant for each specific SRA.
- ^c PM10 emissions are potentially significant under the SCAQMD mass lookup table screening analysis; therefore, an air dispersion modeling analysis was necessary to determine if the Project has significant construction emissions impacts.
- ^d Maximum Daily (with overlapping phases) takes into account the overall schedule and the overlap of subphases. The maximum planning area reports the maximum for each planning area, regardless of the subphase and in isolation from the other planning areas. Therefore, Maximum Daily emissions do not represent the sum of the individual planning area emissions as the maximum subphases for each may not overlap.

q. Volume I, p. IV.D-62, Table IV.D-10

**Table IV.D-10
2021 Project Construction Risk (Unmitigated)**

	Cancer	Chronic	Acute ^a
Maximum Risk			
2021 Project Maximum Risk (Receptor #66437)	3.93 2.81	0.001	0.0003
SCAQMD Numeric Indicators	10	1	1
Significant?	No	No	No
2018 SEIR Maximum Risk	1.20	—	—
<i>Difference (2021 Project minus 2018 SEIR)^b</i>	2.73	—	—

SOURCE: ESA 2021.

NOTES:

Risk is rounded. As such, the “total” values presented herein may be one unit more or less than actual values. Exact values (i.e., non-rounded) are provided in Appendix D1 of this 2021 SEIR.

^a Particulate Matter does not have an acute risk.

^b Modeling differences between the 2018 and 2021 analyses result in higher relative risk compared to construction activities. Because values for chronic and acute were reported as “<1” and the 2021 values are substantially below regulatory thresholds, the difference between the 2018 and 2021 values is not quantified.

r. Volume I, p. IV.D-62, Table IV.D-11

**Table IV.D-11
2021 Project Localized Operational Emissions (Unmitigated)**

	NOx	CO	PM10 ^a	PM2.5 ^a
Maximum Daily Emissions (Year 2026; Screening Analysis) (lbs/day)				
PA1	25	115	3	3
PA2	2	6	2	1
PA3	10	17	5	2
Maximum Daily	38	138	10	5
SCAQMD Daily Significance Threshold ^b	68	1,530	4	2
Potentially Significant?	No	No	Yes^c	Yes^c
2018 SEIR	53	164	14	11
<i>Difference (2021 Project minus 2018 SEIR)</i>	(15)	(26)	(4)	(6)

	NO ₂	CO	PM10	PM2.5
Maximum Daily Concentration (Year 2026; Refined Analysis) (µg/m³)				
Maximum Daily Impact (1-hour Highest)	473 <u>190</u>	—	—	—
Threshold	339	—	—	—
Maximum Daily Impact (1-hour 8th Highest)	434 <u>142</u>	—	—	—
Threshold	188	—	—	—
Maximum Daily Impact (24 hour)	—	—	2.09	—
Threshold	—	—	2.5	—
Maximum Daily Impact (Annual)	34 <u>36</u>	—	0.97	0.81
Threshold	57	—	1	2.5
Significant?	No	—	No	No
2018 SEIR (24 hour)	—	—	—	—
Difference (2021 Project minus 2018 SEIR)	—	—	—	—

SOURCE: ESA 2021.

NOTES:

Emissions quantities are rounded to “whole number” values. As such, the “total” values presented herein may be one unit more or less than actual values. Exact values (i.e., non-rounded) are provided in the CalEEMod model printout sheets and/or calculation worksheets that are presented in Appendix D1 of this 2021 SEIR.

- ^a PM10 emissions estimates are based on compliance with SCAQMD Rule 403 requirements for fugitive dust suppression, which require that no visible dust be present beyond the Project Site boundaries.
- ^b Significance thresholds are based on SCAQMD mass look-up screening levels for SRA 4 and conservatively assuming 5 acres of disturbance daily with sensitive receptors located within 25 meters of the Project Site. Mass look-up screening levels are based on allowable maximum emissions that would not cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standard, which is developed based on ambient concentrations of that pollutant for each specific SRA.
- ^c PM10 and PM2.5 emissions are potentially significant under the SCAQMD mass lookup table screening analysis; therefore, an air dispersion modeling analysis was necessary to determine if the Project has significant operations emissions impacts.

s. Volume I, p. IV.D-64, Table IV.D-12

**Table IV.D-12
2021 Project Combined Risk (Unmitigated)**

	Cancer Risk (per million)				
	Total	Construction	Operational	Chronic	Acute
8-Year Construction Risk Scenario					
Off-Site Receptor #37	1.33 <u>1.63</u>	0.97	0.36 <u>0.66</u>	0.0005 <u><0.01</u>	0.0003 <u><0.01</u>
DD3 Receptor #725	0.70 <u>1.02</u>	0.52	0.18 <u>0.65</u>	0.0008 <u><0.01</u>	0.0004 <u><0.01</u>
On-Site Receptor #17887 ^a	0.36 <u>0.78</u>	—	0.36 <u>0.78</u>	0.00032 <u><0.01</u>	0.00007 <u><0.01</u>
Carson Country Mart, Receptor #94937 ^b	0.46 <u>1.16</u>	—	0.46 <u>1.16</u>	0.00044 <u><0.01</u>	0.00015 <u><0.01</u>

**Table IV.D-12
2021 Project Combined Risk (Unmitigated)**

	Cancer Risk (per million)				
	Total	Construction	Operational	Chronic	Acute
4-Year Construction Risk Scenario					
Off-Site Receptor #37	4.44 <u>4.81</u>	3.93	0.48 <u>0.88</u>	0.004 <u><0.01</u>	0.0003 <u><0.01</u>
DD3 Receptor #725	1.72 <u>2.16</u>	1.29	0.43 <u>0.87</u>	0.002 <u><0.01</u>	0.0040 <u><0.01</u>
On-Site Receptor #17887 ^a	0.48 <u>1.05</u>	—	0.48 <u>1.05</u>	0.00030 <u><0.01</u>	0.00007 <u><0.01</u>
Carson Country Mart, Receptor #04937 ^b	0.62 <u>1.58</u>	—	0.62 <u>1.58</u>	0.00044 <u><0.01</u>	0.000045 <u><0.01</u>
30-Year Operational Risk Scenario					
Off-Site Receptor #3788	1.10 <u>2.81</u>	—	1.10 <u>2.81</u>	0.00033 <u><0.01</u>	<u><0.01</u>
DD3 Receptor #725693	0.98 <u>1.90</u>	—	0.98 <u>1.90</u>	0.00029 <u><0.01</u>	<u><0.01</u>
On-Site Receptor #17887 ^a	1.10 <u>2.27</u>	—	1.10 <u>2.27</u>	0.00033 <u><0.01</u>	<u><0.01</u>
Carson Country Mart, Receptor #04937 ^b	1.40 <u>3.40</u>	—	1.40 <u>3.40</u>	0.00044 <u><0.01</u>	<u><0.01</u>
SCAQMD Numeric Indicators Significant?	10 No			1 No	1 No
2018 SEIR Reported Values					
Off-Site Receptor ^c	2.7	0	2.7	<0.01	<0.01
DD3 Receptor ^c	2.1	0	2.7	<0.01	<0.01
On-Site Receptor	3.6	N/A	3.6	<0.01	<0.01

SOURCE: ESA 2021.

NOTES:

Risk is rounded. As such, the “total” values presented herein may be one unit more or less than actual values. Exact values (i.e., non-rounded) are provided in Appendix D1 of this 2021 SEIR.

The 8-year construction scenario includes risk from construction of the 2021 Project beginning with horizontal construction of PA2 in 2018 and ending with 22 years of operational activities after construction of the 2021 Project is completed. The 4-year construction scenario does not include the horizontal construction of PA2 that was completed in 2018 and 2019 and ending with 26 years of operational activities after the 2021 Project is completed. The 30-year scenario only takes into account 30 years of operational activities after construction is completed.

- ^a While the 2021 Project/2018 Project is not required to determine risk to itself, the risk to on-site receptors from operation of the Project Site is provided for informational purposes and is not included as part of the significance finding.
- ^b Carson Country Mart receptors are conservatively estimated as residential receptors as a worst-case risk potential for those in the nearby neighborhoods.
- ^c Construction emissions show 0.0 for all receptors because as on-site truck emissions during operation represent the greatest portion of risk, risk is higher for receptors when the 30-year risk is all operational related. Construction emissions are low (as seen in Table IV.B-2). This analysis represents the worst-case scenario.

t. Volume I, p. IV.D-68, Mitigation Measure G-7

Mitigation Measure G-7: ~~The Applicant shall utilize coatings and solvents that are consistent with applicable SCAQMD rules and regulations. Should sub-phasing within any of the Planning Areas result in the overlap of construction and operation, construction shall be coordinated and managed to ensure that Property-wide coating activities would not result in the exceedance of maximum operational ROC emissions as shown in Table IV.G 14. Construction ROC emissions can be limited through the use of pre-fabricated and pre-coated materials, limiting the amount of daily coating activities, and tenant coordination. To reduce VOC emissions associated with construction activities, the contractor for PA1 shall ensure that VOC emissions from architectural coating activities have low VOC content, or that architectural coating activities for PA1 do not occur at the same time as architectural coating activities for PA2 painting within each of the Planning Areas would not overlap and would also use low-VOC paints pursuant to SCAQMD Rule 1113. (Applicable to PA1, PA2, and PA3.)~~

u. Volume I, p. IV.D-69, Mitigation Measure G-17

Mitigation Measure G-17: Building materials shall comply with all applicable SCAQMD rules and regulations. ~~The use of low-VOC cleaning products shall be required in all hotels.~~ The 2021 Project shall incorporate the use of low-VOC architectural coating pursuant to SCAQMD Rule 1113 for repainting and maintenance/touch-up of the non-residential buildings and residential buildings for all common/non-living space/outdoor areas. (Applicable to PA1, PA2, and PA3.)

v. Volume I, p. IV.D-70, Mitigation Measure G-21

Mitigation Measure G-21: ~~The Each Applicant shall pay a fair-share contribution for a low-emissions shuttle service between the Property-Project Site and other major activity centers within the 2021 Project vicinity (i.e., the Metro Rail Blue Line station at Del Amo Boulevard and Santa Fe Avenue and the Carson Transfer Station at the South Bay Pavilion). (Applicable to PA1, ~~and PA2,~~ and PA3(b). Not applicable to PA3(a) as it is an industrial land use.)~~

w. Volume I, p. IV.D-75, first full paragraph, penultimate sentence

... Only one of these 14 warehouse/industrial use projects (CP 35, which is discussed in detail below), would result in potential truck access routes that would pass by the receptors within approximately one quarter mile of the 2021 Project. The other 13 industrial CPs would have access to a freeway on- and off-ramp prior to passing by the 2021 Project receptors and, therefore, would likely not have a substantial contribution to risk to the 2021 Project receptors.

x. Volume I, p. IV.D-81, Table IV.D-14

**Table IV.D-14
2021 Project Regional Operational Emissions (Mitigated) (lbs/day)**

	VOC	NOx	CO	SOx	PM10	PM2.5
Maximum Daily Emissions (Year 2026)						
Area	80	1	104	0	1	1
Energy	1	7	4	0	1	1
Mobile	130	476	1,182	5	461	129
<u>TRU</u>	<u>≤1</u>	<u>≤1</u>	<u>≤1</u>	<u>≤1</u>	<u>≤1</u>	<u>≤1</u>
Stationary ^a	4	5	37	0	1	1
Total 2021 Project	216	490	1,327	6	463	131
SCAQMD Significance Threshold	55	55	550	150	150	55
Significant?	Yes	Yes	Yes	No	Yes	Yes
2018 SEIR	193	578	1,633	9	384	113
<i>Difference (2021 Project minus 2018 SEIR)</i>	23	(89)	(306)	(3)	80	18
Maximum Daily Emissions (Year 2035)						
Area	80	1	104	0	1	1
Energy	1	7	4	0	1	1
Mobile	83	293	892	4	460	127
<u>TRU</u>	<u>≤1</u>	<u>≤1</u>	<u>≤1</u>	<u>≤1</u>	<u>≤1</u>	<u>≤1</u>
Stationary ^a	4	5	37	0	1	1
Total 2021 Project	169	306	1,037	4	462	129
SCAQMD Significance Threshold	55	55	550	150	150	55
Significant?	Yes	Yes	Yes	No	Yes	Yes
2018 SEIR	193	578	1,633	9	384	113
<i>Difference (2021 Project minus 2018 SEIR)</i>	(24)	(272)	(596)	(4)	78	16

**Table IV.D-14
2021 Project Regional Operational Emissions (Mitigated) (lbs/day)**

	VOC	NOx	CO	SOx	PM10	PM2.5
Maximum Daily Emissions (Year 2040)						
Area	80	1	104	0	1	1
Energy	1	7	4	0	1	1
Mobile	67	169	803	3	459	126
<u>TRU</u>	<u>≤1</u>	<u>≤1</u>	<u>≤1</u>	<u>≤1</u>	<u>≤1</u>	<u>≤1</u>
Stationary ^a	4	5	37	0	1	1
Total 2021 Project	153	183	948	4	461	128
SCAQMD Significance Threshold	55	55	550	150	150	55
Significant?	Yes	Yes	Yes	No	Yes	Yes
2018 SEIR	193	578	1,633	9	384	113
<i>Difference (2021 Project minus 2018 SEIR)</i>	<i>(40)</i>	<i>(396)</i>	<i>(685)</i>	<i>(5)</i>	<i>78</i>	<i>15</i>

SOURCE: ESA 2021.

NOTES:

Emissions quantities are rounded to “whole number” values. As such, the “total” values presented herein may be one unit more or less than actual values. Exact values (i.e., non-rounded) are provided in the CalEEMod model printout sheets and/or calculation worksheets that are presented in Appendix D1 of this 2021 SEIR.

^a Emissions due to stationary sources are from the operation of the on-site flare system.

y. Volume I, p. IV.D-71, Mitigation Measure C-18

Mitigation Measure C-18: The PA1, PA2, and PA3 Applicant(s) shall implement a Transportation Demand Management (TDM) Program aimed at discouraging single-occupancy vehicle trips and encouraging alternative modes of transportation, such as carpooling, taking transit, walking, and biking. The TDM Program shall be subject to review and approval prior to issuance of certificate of occupancies by the City of Carson Department of Public Works subject to the requirements specified below. Mandatory strategies in the TDM Program shall include the TDM strategies summarized below. This TDM program is estimated to reduce total VMT per service population by about 2 percent based on the trip reduction methodology described in the California Air Pollution Control Officers Association (CAPCOA) *Quantifying Greenhouse Gas Mitigation Measures* report.

III.B.8 Section IV.F, Biological Resources

a. Volume I, p. IV.F-2, first full paragraph, fifth sentence

ESA conducted biological reconnaissance surveys in July 2020 and April 2021 for the 2021 Project. ... In addition to general surveys, focused surveys for burrowing owl (*Athene cunicularia*) were conducted at PA3, including three full sweeps of the Project Site, ~~were~~

~~completed~~ on July 14, 2021, and were conducted in accordance with the standard CDFW protocols as described in the Staff Report on Burrowing Owl Mitigation.¹⁵⁶ ...

b. Volume I, p. IV.F-17, first partial paragraph

... biological surveys and focused surveys for the burrowing owl at PA3. Impacts would be **less than significant with implementation of the identified mitigation measure**.

c. Volume I, p. IV.F-17, Section IV.F.6, first paragraph

This 2021 SEIR proposes the following new ~~and voluntary~~ mitigation measure ~~to ensure that there are no impacts to common or sensitive avian species, although the analysis does not indicate there is a likelihood that nesting birds would occur on site~~ for PA3 out of an abundance of caution to both implement the Migratory Bird Treaty Act and reduce the severity of an already less-than-significant impact to common or sensitive nesting birds; therefore, impacts would be less than significant before mitigation.¹⁶⁴

Mitigation Measure K-1. Impacts to nesting birds would be avoided in PA3 by conducting all construction activities outside of the bird nesting season (i.e., from September ~~1~~ 15 to February 14 for most birds, from July 1 to January ~~14~~ 1 for raptors). However, if construction activities must occur during the nesting season, the following measures shall apply:

- A. Prior to work during the bird nesting season (February 15 to ~~August 31~~ September 15 for most birds, January ~~15~~ 1 to June 31 for raptors), a qualified biologist shall conduct a pre-construction survey of all suitable habitat for the presence of nesting birds no more than 7 days prior to construction activities, including any ground-disturbing activities (e.g., staging, mobilization, grading), as well as prior to any vegetation removal within the Project Site. The results of the pre-construction survey shall be valid for 7 days; if vegetation removal activities do not commence within 7 days following the survey or if activities cease for more than 7 consecutive days, a new pre-construction nesting bird survey shall be conducted before construction resumes.
- B. If any active nests are found during a pre-construction nesting bird survey, a buffer of up to 300 feet for most bird species and 500 feet for raptors, or as determined appropriate by the qualified biologist (based on species-specific tolerances and site-specific conditions), shall be delineated, flagged, and avoided until the nesting cycle is complete (i.e., the qualified biologist determines that the young have fledged or the nest has failed). The qualified

¹⁵⁶ California Department of Fish and Wildlife, Staff Report on Burrowing Owl Mitigation, March 7, 2012.

¹⁶⁴ As noted in Chapter III, Introduction to the Analysis, of this 2021 SEIR, the mitigation measure numbering system from the 2018 SEIR was maintained in this 2021 SEIR, even if the section numbering for the 2021 SEIR section is different. In this case, this section number is "F," but mitigation measures are numbered "K" as this is new mitigation being included in the 2021 SEIR.

biologist may also recommend other measures to minimize disturbances to active nests that may include but are not limited to limiting the duration of certain activities, placing sound barriers (e.g., noise blankets), or visual barriers (e.g., straw bales), and/or providing full-time monitoring by a qualified biologist.

- C. As a provisional additional mitigation element, in case surveys identify burrowing owl as present on site, such occurrence shall be documented and CDFW shall be notified. Although it is considered highly unlikely that a pair of burrowing owls might attempt to nest on the site (due to disturbance, limited food resources, and presence of coyotes), if an active burrowing owl nest is encountered, a minimum buffer of 500 feet shall be delineated, flagged, and avoided by construction activity until the nesting cycle is complete (i.e., the qualified biologist determines that the young have fledged or the nest has failed). A qualified biologist may recommend other measures as noted in Item B, above. However, CDFW will be consulted prior to any reduction of avoidance buffers or implementation of other measures, such as passive relocation.

III.B.9 Section IV.G, Energy

a. *Volume I, p. IV.G-26, 2021 SEIR PDF-C1*

- **2021 SEIR PDF-C1:** Mobile off-road construction equipment (wheeled or tracked) and all diesel-fueled off-road construction equipment used during construction of the 2021 Project shall meet the USEPA Tier 4 final standards, either as original equipment or equipment retrofitted to meet the Tier 4 final standards. In the event of specialized equipment use where Tier 4 equipment is not commercially available at the time of construction, then the equipment shall, at a minimum, meet the Tier 3 standard. Zero-emissions construction equipment shall be incorporated when commercially available at no more than a 30 percent price differential compared to non-zero-emissions equipment. For purposes of this project design feature, “commercially available” is defined as equipment built by the original manufacturer and available for lease or hire within 20 miles of the City of Carson and available in a similar timeframe to fossil-fueled options. If Tier 4 Final engine equipment or zero-emissions equipment is not commercially available, the contractor must show proof that the equipment is not commercially available by providing letters from at least two independent rental companies, each of which must own or operate a construction equipment fleet with total maximum horsepower of greater than 2,500 horsepower, for each piece of off-road equipment where the Tier 4 Final engine or zero-emissions equipment is not available. This requirement shall be incorporated into applicable bid documents, purchase orders, and contracts with successful contractors demonstrating 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 shall be available upon request at the time of mobilization of each applicable unit of

equipment. (Modified from 2018 SEIR PDF Mitigation Measure G-6) (Applicable to PA1, PA2, and PA3; ~~zero-emissions construction equipment use is not required for PA2.~~)

b. Volume I, p. IV.G-26, 2021 SEIR PDF-C2

- **2021 SEIR PDF-C2:** Limiting excavations to avoid exposing landfill contents. (~~2018 SEIR PDF~~) (Applicable to PA1, PA2, and PA3.)

c. Volume I, p. IV.G-26, 2021 SEIR PDF-C4

- **2021 SEIR PDF-C4:** ~~Electricity from power poles~~ Electric hook-ups to the power grid or battery power shall be used rather than temporary diesel- or gasoline-powered generators shall be used to the extent for electric construction tools, such as saws, drills, and compressors, whenever feasible. For PA3 and PA1, mobile off-road construction equipment of less than 50 horsepower shall be electric, including: air compressors, concrete/industrial saws, welders and plate compactors. Mobile off-road construction equipment with a power rating of 19 kilowatts or less shall be battery powered. If generators need to be used to reach remote portions of the site, non-diesel generators shall be used. (Modified from 2018 SEIR Mitigation Measure G-4)²¹⁷ (Applicable to PA1, PA2, and PA3.)

d. Volume I, p. IV.G-27, 2021 SEIR PDF-C6

- **2021 SEIR PDF-C6:** All fleet-contracted on-road heavy-duty haul trucks used for remediation and construction hauling activities from PA1 and PA3 shall be model year 2014 or newer if diesel fueled. The requirement for the use of 2014 or newer vehicles does not apply to delivery trucks or other non-contracted fleets. (Applicable to PA1, PA2, and PA3.)

e. Volume I, p. IV.G-27, 2021 SEIR PDF-C8

- **2021 SEIR PDF-C8:** 2021 Project contractors shall provide information on transit and ride sharing programs and services to construction employees. As feasible can be safely accommodated (at the sole discretion of the construction Site Supervisor), provide for meal options on site, or shuttle buses between the site and nearby meal destinations for use by construction contractors. (Applicable to PA1, PA2, and PA3.)

f. Volume I, p. IV.G-27, 2021 SEIR PDF-O4 and PDF-O5

- **2021 SEIR PDF-O4:** All residential and non-residential buildings shall meet or exceed the more stringent of the 2016-2019 California Title 24 Efficiency standards for water, heating, space heating, and cooling, by a minimum of 5 percent or achieve equivalent energy efficiency savings by other means or others adopted by the City. (Modified from

²¹⁷ Mitigation Measure G-4 was replaced by 2021 SEIR PDF-C4 as it is a quantified part of the unmitigated modeling scenario.

2018 SEIR Mitigation Measure G-15)²¹⁹ (Applicable to PA1, ~~PS2,~~ and PA3, ~~PA2~~ applicability is limited to the Title 24 efficiency standards effective at the time construction began.)

- **2021 SEIR PDF-O5:** The ~~Developer~~ Applicant(s) of each planning area within the Project Site shall implement the following trip demand measures:
 - a) ~~The Applicant shall p~~Provide bicycle racks located at convenient locations throughout ~~The District at South Bay~~ the 2021 Project. (Modified from 2018 SEIR Mitigation Measure G-22)²²⁰ (Applicable to PA1, PA2, and PA3.)
 - b) ~~The Applicant shall p~~Provide bicycle paths along the main routes throughout ~~The District at South Bay~~ the Project Site consistent with the 2021 Specific Plan Amendment. (Modified from 2018 SEIR Mitigation Measure G-23)²²¹ (Applicable to PA1, PA2, and PA3.)
 - c) ~~The Applicant shall p~~Provide convenient pedestrian access throughout ~~The District at South Bay~~ the Project Site. (Modified from 2018 SEIR Mitigation Measure G-24)²²² (Applicable to PA1, PA2, and PA3.)
 - d) Provide on-site shower facilities for use by all employees bicycling/walking to work. (Applicable to the light industrial uses in PA3(a).)
 - e) Light industrial tenants shall provide preferential parking for employees using vehicles displaying valid “clean air vehicles” decals issued by the California Department of Motor Vehicles. Percentage of parking to be allotted by facility shall be governed by City or CALGreen standards. (Applicable to the light industrial uses in PA3(a).)
 - f) Each light industrial tenant within PA3(a) shall be responsible for having a designated coordinator to oversee a carpool match or other ride-share program for the facility. ~~To the extent feasible,~~ The programs for all tenants shall be interlinked to provide expanded resources for ride-share/carpool opportunities. (Applicable to the light industrial uses in PA3(a).)

²¹⁹ This measure was replaced by 2021 SEIR PDF-O7 as it is a regulatory requirement modeled as part of the unmitigated scenario.

²²⁰ 2018 Mitigation Measure G-22 was moved to the 2021 SEIR PDF section because bicycle and pedestrian pathways are part of the 2021 Project Description; therefore, bicycle parking would be part of the 2021 Project to accommodate bicycle access.

²²¹ 2018 Mitigation Measure G-23 was moved to the 2021 SEIR PDF section because bicycle and pedestrian pathways are part of the 2021 Project Description.

²²² 2018 Mitigation Measure G-24 was moved to the 2021 SEIR PDF section because bicycle and pedestrian pathways are part of the 2021 Project Description.

g. Volume I, p. IV.G-28, 2021 SEIR PDF-07

- **2021 SEIR PDF-07:** Electric vehicle charging stations shall be provided as follows:
 - a) The Applicant of PA1 shall provide passenger vehicle charging stations for a minimum of 6 percent parking spaces (169 spaces). Compliance shall be in accordance with CALGreen Code applicable at the time building permits are issued. (Applicable to PA1.)
 - b) The Applicant of PA3 shall provide passenger vehicle charging stations for a minimum of 10 percent parking spaces (82 spaces). Compliance shall be in accordance with CALGreen Code applicable at the time building permits are issued. (Applicable to PA3.)
 - c) Each of the Applicant(s) of PA1 and PA3 shall install Level 2 or better electric vehicle charging stations for a combined total of 325 spaces on site between the beginning of construction and December 2039 (the 325 spaces are in addition to the CALGreen Code requirement of 169 spaces in PA1 and 82 spaces in PA3). If on-site charging stations cannot be accommodated, charging stations may be distributed throughout the city. The 325 electrovoltaic (EV) supplied spaces will be provided for passenger and light-duty vehicles. Level 4 EV charging for trucks can be substituted at 0.11 truck spaces for every passenger vehicle space in PA3. Passenger and light-duty vehicle and truck charging requirements can be satisfied on or off site; however, on-site charging will be prioritized. (Applicable to PA1 and PA3.)²²⁴
 - d) Provide infrastructure, as the parking area is developed, to support the energy load for electric truck vehicle charging. Truck charging infrastructure shall be designed to support a minimum of 25 percent of the truck parking spaces for each of the light industrial use in PA3(a). (Applicable to the uses in PA3(a).)
 - e) Meet CALGreen Tier 2 green building standards, including all provisions related to designated parking for clean air vehicles, electric vehicle charging, and bicycle parking. (Applicable to the light industrial uses in PA3.)

h. Volume I, p. IV.G-29, 2021 SEIR PDF-09

- **2021 SEIR PDF-09:** When not in use all truck engines shall be turned off. Idling will be limited to 2 minutes or less per occurrence and location for PA3. Idling and operation restrictions shall be posted for view from both on-site and off-site personnel. Appropriate signage shall identify idling restrictions and contact information to report violations to CARB and SCAQMD within PA3. ~~Consistent with the 2018 SEIR, idling restrictions of 5 minutes or less per occurrence and location are applicable to PA1 and PA2.~~ (Applicable to PA1, PA2, and PA3.)

²²⁴ *At the discretion of the Applicant(s) of PA2, additional EV charging stations may be incorporated beyond those required of PA2 as part of the 2018 SEIR mitigation requirements.*

i. Volume I, pp. IV.G-29 to IV.G-30, 2021 SEIR PDF-O15 and PDF-O16

- **2021 SEIR PDF-O15:** All light industrial buildings shall implement a combination of sky lights and solar photovoltaic (PV) infrastructure such that a minimum of 25 percent of the rooftops will include solar PV arrays at buildout. In addition, 25 percent of the rooftops not otherwise covered with solar shall be structurally designed and installed to accommodate solar in the future. (Applicable to uses in PA3(a).)
- **2021 SEIR PDF-O16:** For the uses within PA3(a), leasing preference shall be given to prospective tenants with a facility-owned and operated fleet that is alternative/zero-emissions. ~~All owned or contracted fleets~~ At a minimum, warehouse tenants/owners and/or operators shall ensure that all truck fleets accessing the 2021 Project’s light industrial uses shall meet or exceed the 2014 model-year emissions equivalent engine standards as currently defined in California Code of Regulations Title 13, Division 3, Chapter 1, Article 4.5, Section 2025. Light Industrial tenants shall ensure that of all trucks of model year 2021 and newer 75 percent will be zero- or near-zero-emissions vehicles by 2035, and 100 percent zero- or near-zero-emissions vehicles by 2040. Facility operators shall maintain records on site demonstrating compliance with this requirement and shall make records available to inspection by local jurisdiction, air districts, and the State upon request. (Applicable to the uses in PA3(a).)

j. Volume I, p. IV.G-43, Mitigation Measure G-21

Mitigation Measure G-21: ~~The~~ Each Applicant shall pay a fair-share contribution for a low-emissions shuttle service between the ~~Property~~ Project Site and other major activity centers within the 2021 Project vicinity (i.e., the Metro Rail Blue Line station at Del Amo Boulevard and Santa Fe Avenue and the Carson Transfer Station at the South Bay Pavilion). (Applicable to PA1, ~~and PA2,~~ and PA3(b). Not applicable to PA3(a) as it is an industrial land use.)

k. Volume I, p. IV.G-43, Mitigation Measure C-18

Mitigation Measure C-18: The PA1, PA2, and PA3 Applicant(s) shall implement a Transportation Demand Management (TDM) Program aimed at discouraging single-occupancy vehicle trips and encouraging alternative modes of transportation, such as carpooling, taking transit, walking, and biking. The TDM Program shall be subject to review and approval prior to issuance of certificate of occupancies by the City of Carson Department of Public Works subject to the requirements specified below. Mandatory strategies in the TDM Program shall include the TDM strategies summarized below. This TDM program is estimated to reduce total VMT per service population by about 2 percent based on the trip reduction

methodology described in the California Air Pollution Control Officers Association (CAPCOA) *Quantifying Greenhouse Gas Mitigation Measures* report.

III.B.10 Section IV.H, Greenhouse Gas Emissions

a. Volume I, p. IV.H-44, 2021 SEIR PDF-C1, PDF-C2, and PDF-C4

- **2021 SEIR PDF-C1:** Mobile off-road construction equipment (wheeled or tracked) and all diesel-fueled off-road construction equipment used during construction of the 2021 Project shall meet the USEPA Tier 4 final standards, either as original equipment or equipment retrofitted to meet the Tier 4 final standards. In the event of specialized equipment use where Tier 4 equipment is not commercially available at the time of construction, then the equipment shall, at a minimum, meet the Tier 3 standard. Zero-emissions construction equipment shall be incorporated when commercially available at no more than a 30 percent price differential compared to non-zero-emissions equipment. For purposes of this project design feature, “commercially available” is defined as equipment built by the original manufacturer and available for lease or hire within 20 miles of the City of Carson and available in a similar timeframe to fossil-fueled options. If Tier 4 Final engine equipment or zero-emissions equipment is not commercially available, the contractor must show proof that the equipment is not commercially available by providing letters from at least two independent rental companies, each of which must own or operate a construction equipment fleet with total maximum horsepower of greater than 2,500 horsepower, for each piece of off-road equipment where the Tier 4 Final engine or zero-emissions equipment is not available. This requirement shall be incorporated into applicable bid documents, purchase orders, and contracts with successful contractors demonstrating 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 shall be available upon request at the time of mobilization of each applicable unit of equipment. (Modified from 2018 SEIR PDF-Mitigation Measure G-6) (Applicable to PA1, PA2, and PA3; ~~zero-emissions construction equipment use is not required for PA2.~~)
- **2021 SEIR PDF-C2:** Limiting excavations to avoid exposing landfill contents. (~~2018 SEIR PDF-~~) (Applicable to PA1, PA2, and PA3.)
- **2021 SEIR PDF-C4:** ~~Electricity from power poles~~ Electric hook-ups to the power grid or battery power shall be used rather than temporary diesel- or gasoline-powered generators shall be used to the extent for electric construction tools, such as saws, drills, and compressors, whenever feasible. For PA3 and PA1, mobile off-road construction equipment of less than 50 horsepower shall be electric. including: air compressors, concrete/industrial saws, welders and plate compactors. Mobile off-road construction equipment with a power rating of 19 kilowatts or less shall be battery powered. If generators need to be used to reach remote portions of the site, non-diesel generators

shall be used. (Modified from 2018 SEIR Mitigation Measure G-4)³⁴⁵ (Applicable to PA1, PA2, and PA3.)

b. Volume I, p. IV.H-45, 2021 SEIR PDF-C6

- **2021 SEIR PDF-C6:** All fleet-contracted on-road heavy-duty haul trucks used for remediation and construction hauling activities from PA1 and PA3 shall be model year 2014 or newer if diesel fueled. The requirement for the use of 2014 or newer vehicles does not apply to delivery trucks or other non-contracted fleets. (Applicable to PA1, PA2, and PA3.)

c. Volume I, p. IV.H-45, 2021 SEIR PDF-C7

- **2021 SEIR PDF-C7:** Contractors shall conduct routine inspections (at least once per calendar week during active construction) to verify compliance with construction mitigation and to identify other opportunities to further reduce construction impacts. Inspection reports shall be maintained on site throughout the construction period. (Applicable to PA1, PA2, and PA3.)

d. Volume I, p. IV.H-45, 2021 SEIR PDF-C8

- **2021 SEIR PDF-C8:** 2021 Project contractors shall provide information on transit and ride sharing programs and services to construction employees. As feasible can be safely accommodated (at the sole discretion of the construction Site Supervisor), provide for meal options on site, or shuttle buses between the site and nearby meal destinations for use by construction contractors. (Applicable to PA1, PA2, and PA3.)

e. Volume I, p. IV.H-45, 2021 SEIR PDF-O2

- **2021 SEIR PDF-O2:** All stationary-source emissions sources (e.g., landfill gas flares, emergency generator) would utilize Best Available Control Technology (BACT) to meet SCAQMD requirements, and would maintain appropriate SCAQMD permits. ~~(2018 SEIR PDF)~~ (Applicable to PA1, PA2, and PA3.)

f. Volume I, p. IV.H-45, 2021 SEIR PDF-O4 and PDF-O5

- **2021 SEIR PDF-O4:** All residential and non-residential buildings shall meet or exceed the more stringent of the 2016-2019 California Title 24 Efficiency standards for water, heating, space heating, and cooling, by a minimum of 5 percent or achieve equivalent energy efficiency savings by other means or others adopted by the City. (Modified from 2018 SEIR Mitigation Measure G-15)³⁴⁷ (Applicable to PA1, PA2, and PA3; ~~PA2 applicability is limited to the Title 24 efficiency standards effective at the time construction began.~~)

³⁴⁵ Mitigation Measure G-4 was replaced by 2021 SEIR PDF-C4 as it is a quantified part of the unmitigated modeling scenario.

³⁴⁷ This measure was replaced by 2021 SEIR PDF-O7 as it is a regulatory requirement modeled as part of the unmitigated scenario.

- **2021 SEIR PDF-O5:** ~~The Developer Applicant(s)~~ of each planning area within the Project Site shall implement the following trip demand measures:
 - a) ~~The Applicant shall p~~Provide bicycle racks located at convenient locations throughout ~~The District at South Bay~~ the 2021 Project. (Modified from 2018 SEIR Mitigation Measure G-22)³⁴⁸ (Applicable to PA1, PA2, and PA3.)
 - b) ~~The Applicant shall p~~Provide bicycle paths along the main routes throughout ~~The District at South Bay~~ the Project Site consistent with the 2021 Specific Plan Amendment. (Modified from 2018 SEIR Mitigation Measure G-23)³⁴⁹ (Applicable to PA1, PA2, and PA3.)
 - c) ~~The Applicant shall p~~Provide convenient pedestrian access throughout ~~The District at South Bay~~ the Project Site. (Modified from 2018 SEIR Mitigation Measure G-24)³⁵⁰ (Applicable to PA1, PA2, and PA3.)
 - d) Provide on-site shower facilities for use by all employees bicycling/walking to work. (Applicable to the light industrial uses in PA3(a).)
 - e) Light industrial tenants shall provide preferential parking for employees using vehicles displaying valid “clean air vehicles” decals issued by the California Department of Motor Vehicles. Percentage of parking to be allotted by facility shall be governed by City or CALGreen standards. (Applicable to the light industrial uses in PA3(a).)
 - f) Each light industrial tenant within PA3(a) shall be responsible for having a designated coordinator to oversee a carpool match or other ride-share program for the facility. To the extent feasible, the programs for all tenants shall be interlinked to provide expanded resources for ride-share/carpool opportunities. (Applicable to the light industrial uses in PA3(a).)

g. Volume I, p. IV.H-46, 2021 SEIR PDF-O7

- **2021 SEIR PDF-O7:** Electric vehicle charging stations shall be provided as follows:
 - a) The Applicant of PA1 shall provide passenger vehicle charging stations for a minimum of 6 percent parking spaces (169 spaces). Compliance shall be in accordance with CALGreen Code applicable at the time building permits are issued. (Applicable to PA1.)
 - b) The Applicant of PA3 shall provide passenger vehicle charging stations for a minimum of 10 percent parking spaces (82 spaces). Compliance shall be in

³⁴⁸ 2018 Mitigation Measure G-22 was moved to the 2021 SEIR PDF section because bicycle and pedestrian pathways are part of the 2021 Project Description; therefore, bicycle parking would be part of the 2021 Project to accommodate bicycle access.

³⁴⁹ 2018 Mitigation Measure G-23 was moved to the 2021 SEIR PDF section because bicycle and pedestrian pathways are part of the 2021 Project Description.

³⁵⁰ 2018 Mitigation Measure G-24 was moved to the 2021 SEIR PDF section because bicycle and pedestrian pathways are part of the 2021 Project Description.

- accordance with CALGreen Code applicable at the time building permits are issued. (Applicable to PA3.)
- c) Each of the Applicant(s) of PA1 and PA3 shall install Level 2 or better electric vehicle charging stations for a combined total of 325 spaces on site between the beginning of construction and December 2039 (the 325 spaces are in addition to the CALGreen Code requirement of 169 spaces in PA1 and 82 spaces in PA3). If on-site charging stations cannot be accommodated, charging stations may be distributed throughout the city. The 325 electrovoltaic (EV) supplied spaces will be provided for passenger and light-duty vehicles. Level 4 EV charging for trucks can be substituted at 0.11 truck spaces for every passenger vehicle space in PA3. Passenger and light-duty vehicle and truck charging requirements can be satisfied on or off site; however, on-site charging will be prioritized. (Applicable to PA1 and PA3.)³⁵²
- d) Provide infrastructure, as the parking area is developed, to support the energy load for electric truck vehicle charging. Truck charging infrastructure shall be designed to support a minimum of 25 percent of the truck parking spaces for each of the light industrial use in PA3(a). (Applicable to the uses in PA3(a).)
- e) Meet CALGreen Tier 2 green building standards, including all provisions related to designated parking for clean air vehicles, electric vehicle charging, and bicycle parking. (Applicable to the light industrial uses in PA3.)

h. Volume I, p. IV.H-47, 2021 SEIR PDF-O9

- **2021 SEIR PDF-O9: When not in use all truck engines shall be turned off. Idling will be limited to 2 minutes or less per occurrence and location for PA3. Idling and operation restrictions shall be posted for view from both on-site and off-site personnel. Appropriate signage shall identify idling restrictions and contact information to report violations to CARB and SCAQMD within PA3. ~~Consistent with the 2018 SEIR, idling restrictions of 5 minutes or less per occurrence and location are applicable to PA1 and PA2.~~ (Applicable to PA1, PA2, and PA3.)**

i. Volume I, p. IV.H-48, 2021 SEIR PDF-O15 and PDF-O16

- **2021 SEIR PDF-O15: All light industrial buildings shall implement a combination of sky lights and solar photovoltaic (PV) infrastructure such that a minimum of 25 percent of the rooftops will include solar PV arrays at buildout. In addition, 25 percent of the rooftops not otherwise covered with solar shall be structurally designed and installed to accommodate solar in the future. (Applicable to uses in PA3(a).)**
- **2021 SEIR PDF-O16: For the uses within PA3(a), leasing preference shall be given to prospective tenants with a facility-owned and operated fleet that is alternative/zero-emissions. ~~All owned or contracted fleets~~ At a minimum, warehouse tenants/owners and/or operators shall ensure that all truck fleets accessing the 2021 Project's light industrial uses shall meet or exceed the 2014 model-year emissions equivalent engine**

³⁵² *At the discretion of the Applicant(s) of PA2, additional EV charging stations may be incorporated beyond those required of PA2 as part of the 2018 SEIR mitigation requirements.*

standards as currently defined in California Code of Regulations Title 13, Division 3, Chapter 1, Article 4.5, Section 2025. Light Industrial tenants shall ensure that of all trucks of model year 2021 and newer 75 percent will be zero- or near-zero-emissions vehicles by 2035, and 100 percent zero- or near-zero-emissions vehicles by 2040. Facility operators shall maintain records on site demonstrating compliance with this requirement and shall make records available to inspection by local jurisdiction, air districts, and the State upon request. (Applicable to the uses in PA3(a).)

j. Volume I, p. IV.H-73, Mitigation Measure G-21

Mitigation Measure G-21: ~~The Each~~ Applicant shall pay a fair-share contribution for a low-emissions shuttle service between the ~~Property~~ Project Site and other major activity centers within the 2021 Project vicinity (i.e., the Metro Rail Blue Line station at Del Amo Boulevard and Santa Fe Avenue and the Carson Transfer Station at the South Bay Pavilion). (Applicable to PA1, ~~and PA2,~~ and PA3(b). Not applicable to PA3(a) as it is an industrial land use.)

k. Volume I, p. IV.H-73, Mitigation Measure C-18

Mitigation Measure C-18: The PA1, PA2, and PA3 Applicant(s) shall implement a Transportation Demand Management (TDM) Program aimed at discouraging single-occupancy vehicle trips and encouraging alternative modes of transportation, such as carpooling, taking transit, walking, and biking. The TDM Program shall be subject to review and approval prior to issuance of certificate of occupancies by the City of Carson Department of Public Works subject to the requirements specified below. Mandatory strategies in the TDM Program shall include the TDM strategies summarized below. This TDM program is estimated to reduce total VMT per service population by about 2 percent based on the trip reduction methodology described in the California Air Pollution Control Officers Association (CAPCOA) *Quantifying Greenhouse Gas Mitigation Measures* report.

III.B.11 Chapter VI, Alternatives

a. Volume I, p. VI-53, penultimate paragraph, last sentence

... Of the 6.29 acres, 2.36 acres would be open space/parks and 3.93 acres would programmed spaces, including: a 6,365-square-foot (sf) arrival plaza, 26,265 sf food and beverage plaza area, 22,740 sf dog park, 3,343 sf performance pavilion, 19,400 sf botanic garden, 25,400 sf children's play area, 19,490 sf bioretention garden, 1,800 sf beer garden, 2,990 games terrace, 35,210 sf event lawn, 2,975 sf sculpture garden, 4,425 sf water feature and iconic element, 570 sf ~~arrival~~ area of pedestrian community bridge, 50,774 sf of planted open spaces, and 52,159 sf of planted buffer areas on the western and southern portions of the Carson Country Mart.

III.B.12 Chapter VII, Other Environmental Considerations

a. Volume I, p. VII-9, second full paragraph and Footnote 427

The Carson Country Mart will provide for approximately 273,906 sf (or 6.29 acres) of programmed spaces and open space/amenity areas that would include an arrival plaza; food and beverage plaza area; dog park; performance pavilion and event lawn; botanic garden; children's play area; bioretention garden; beer garden; games terrace; sculpture garden; water feature; ~~arrival~~ an area for connection to a potential, future pedestrian community bridge;⁴²⁷ and planted open spaces and planted buffer areas on the western and southern portions of the Carson Country Mart.

III.B.13 Appendix D, Air Quality, Energy, and Greenhouse Gas Emissions Documentation

a. Volume II, Appendix D1

Appendix D1 has been updated to include technical revisions made in response to comments in Letter SCAQMD, as discussed further in Chapter IV, *Response to Written Comments*. Revisions include but are not limited to remodeling of truck idling emissions, revisions related to the scalars used in the AERMOD dispersion modeling, and revisions related to utilizing the maximum NO₂ concentration over that last three years instead of the average NO₂ concentration over that last three years, among other changes.

III.B.14 Figure

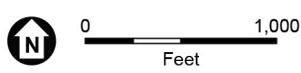
The following figure has been revised:

- Volume I, p. II-35, Figure II-16, Vehicular Circulation Concept

⁴²⁷ The ~~arrival~~ area would serve a potential pedestrian bridge that is contemplated for a potential future project located at 21207 South Avalon Boulevard.



- Specific Plan Boundary (168 acres)
- Planning Areas 1, 2, & 3 (157 acres)
- Development District 3 Boundary (11 acres)
- Torrance Lateral Drainage Channel
- Lenardo Drive
- Stamps Drive (Del Amo Entry)
- Stamps Drive (Typical)
- M Potential Bus Pullout or Traffic Lane Bus Stop
- ◀▶ Signalized Access
- STOP Stop Sign



Note: this is a graphic representation of a planning concept. All graphics in this document are conceptual and should not be interpreted literally. Other solutions, locations and/or concepts may be proposed and reviewed during site plan review and other permit and mapping processes.

D:\160573_10 - The District SEIR Addendum\05 Graphics-GIS-Modeling\Illustrator

SOURCE: ESA, 2021

The District at South Bay Specific Plan Amendment

Figure II-16
Vehicular Circulation Concept [Revised]



IV. RESPONSES TO WRITTEN COMMENTS

IV.A INTRODUCTION

California Code of Regulations Title 14 (CEQA Guidelines) Section 15088(a) states that “The lead agency shall evaluate comments on environmental issues received from persons who reviewed the draft EIR and shall prepare a written response. The lead agency shall respond to comments that were received during the noticed comment period.” In accordance with these requirements, this chapter of the 2022 Final SEIR provides responses to each of the written comment received regarding the 2022 SEIR. **Table IV-1, Summary of Commenters on the 2021 Draft SEIR**, provides a list of public agencies, Native American tribal government, and private entities that provided comments on the 2021 Draft SEIR.

**Table IV-1
Summary of Commenters on the 2021 Draft SEIR**

Letter Name	Summary of Written Comment	Date Received	Page Comments and Responses Begin
Public Agencies			
LACoFD	County of Los Angeles Fire Department	11/17/2021	IV-2
Caltrans	California Department of Transportation	12/7/2021	IV-5
SCAQMD	South Coast Air Quality Management District	12/10/2021	IV-8
CDFW	California Department of Fish and Wildlife	12/13/2021	IV-34
Native American Tribal Government			
Gabrieleno	Gabrieleno Band of Mission Indians–Kizh Nation	11/9/2021	IV-45
Private Entities			
CAM-Carson	CAM-Carson LLC	12/13/2021	IV-46

Section IV.B, *Comments and Responses on the 2021 Draft SEIR*, presents comments submitted during the 45-day public review comment period for the 2021 Draft SEIR from the commenters listed in Table IV-1. Each letter is assigned a letter name and arranged by public agencies first, and then by the Native American Tribal Government and private entities in chronological order, as indicated in Table IV-1. Each comment that requires a response within the letters is assigned a number. For example, the first Public Agency to provide comments was the County of Los Angeles Fire Department (LACoFD). The first comment received from LACoFD is therefore labeled Comment LACoFD-1 and the responses to each comment are correspondingly numbered, (i.e., Response LACoFD-1). A copy of each comment letter is provided in Appendix

A, Original Comment Letters, of this 2022 Final SEIR. Note that the comments have been transcribed from the original letters word for word and no corrections have been made to typographical and/or formatting errors.

Where responses result in a change to the 2021 Draft SEIR, it is noted and shown in as either additions with double underline, or deletions with ~~double strikethrough~~. The resulting change is identified in Chapter III, *Additions and Corrections to the 2021 Draft SEIR*, of this 2022 Final SEIR. As required by the CEQA Guidelines Section 15088 (c), the focus of the responses to comments is on “the disposition of significant environmental issues raised.” Therefore, detailed responses are not provided for comments that do not relate to environmental issues.

IV.B COMMENTS AND RESPONSES ON THE 2021 DRAFT SEIR

IV.B.1 Public Agencies

a. County of Los Angeles Fire Department (LACoFD)

(1) Comment LACoFD-1

PLANNING DIVISION:

We have no comments.

For any questions regarding this response, please contact Kien Chin, Planning Analyst, at (323) 881-2404 or Kien.Chin@fire.lacounty.gov.

(a) Response LACoFD-1

The comment acknowledges that no comments are provided from the Planning Division. No further response is provided.

(2) Comment LACoFD-2

LAND DEVELOPMENT UNIT:

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

This project does not propose construction of structures or any other improvements at this time. Therefore, until actual construction is proposed the project will not have a significant impact to the County of Los Angeles Fire Department’s Land Development Unit.

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.

(a) Response LACoFD-2

As indicated in the comment, the 2021 Project must and would comply with all applicable County of Los Angeles Fire Department code and ordinance requirements for construction, access, water main, fire flows, and fire hydrants. An analysis regarding site access, water, fire flow, and fire hydrants is provided within Chapter VI, *Effects Found Not to Be Significant* (on 2021 Draft SEIR pp. VI-42 and VI-43). Further, as stated on 2021 Draft SEIR p. VI-57, “The 2018 SEIR concluded that the 2018 Project would not significantly impact the City’s adopted emergency response plan/emergency plan and would include roadways and access features in order to meet the requirements of the LACoFD as required by Mitigation Measure I.1-2 (2018 SEIR p. VI-26).”

With respect to construction impacts relative to fire department access, Mitigation Measures C-1 (Construction Traffic Management Plan), contained in the 2021 Draft SEIR on p. IV.C-13, provides various measures to ensure that access to the site would remain unobstructed during construction activities.

All impacts related to fire access and fire control as a result of construction and operation of the 2021 Project were determined to be less than significant or less than significant after mitigation.

(3) Comment LACoFD-3**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 ½ feet above mean 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.

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

(a) Response LACoFD-3

Analysis regarding erosion control, watershed management, and archeological and cultural resources is provided within Chapter VI, *Effects Found Not to Be Significant* (on 2021 Draft SEIR p. VI-14 for erosion, 2021 Draft SEIR pp. VI-33 and VI-34 for watershed-related impacts, and Draft SEIR pp. IV-7 through IV-9). Impacts for these topics were found to be less than significant.

In addition, analysis regarding rare and endangered species, and vegetation is provided in Section IV.F, Biological Resources (on 2021 Draft SEIR pp. IV.F-13 and IV.F-14). As discussed therein, implementation of the 2021 Project would not give rise to new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to rare and endangered species. All impacts related to biological resources would remain less than significant without mitigation; however, Mitigation Measure K-1 is voluntarily proposed to further reduce an already less-than-significant impact by avoiding unlikely impacts to on-site nesting birds in compliance with state and federal laws that protect nesting birds.

The Project Site, a former landfill, does not contain any oak trees and, therefore, would not be subject to the Los Angeles County Oak Tree Ordinance.

As it relates to fuel modification, the wildfire topic was scoped out of the 2021 Draft SEIR, as discussed within the Notice of Preparation dated April 16, 2021, as the Project Site is not located in or near any State Responsibility Areas or lands classified as Very High Fire Hazard Severity Zones. Therefore, no impacts would occur as it relates to wildfires.

(4) Comment LACoFD-4

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. The Cal-EPA Department of Toxic Substances Control is the regulatory environmental oversight agency on record for the project site.

Please contact HHMD senior typist-clerk, Perla Garcia at (323) 890-4035 or Perla.garcia@fire.lacounty.gov if you have any questions.

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

(a) Response LACoFD-4

The comment acknowledges that no comments are provided; therefore, no response is necessary.

b. California Department of Transportation (Caltrans)

(1) Comment Caltrans-1

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The City of Carson will be considering an amendment to The District at South Bay Specific Plan adopted by the City and related improvements (2021 Project). Specifically, the 2021 Project would modify the scope of the 2018 Project to ultimately consist of approximately 2,312,390 square feet of light industrial, regional commercial, restaurant/cafe, neighborhood-serving commercial/retail, restaurants with a drive-thru component, and food & beverage kiosks, no more than 1,250 residential units, and 6.29 acres of passive/active open space/amenity areas. Overall, with these proposed modifications, the overall square footage is an increase to the square footage studied for the project in the 2006 EIR and 2018 SEIR. The 2006 EIR and 2018 SEIR both previously assessed the proposed remediation of the project site and the 2021 Project would continue to undertake remediation under the approved Remedial Action Plan.

(a) Response Caltrans-1

This comment provides a general introduction and accurate summary of the 2021 Project. The comment does not raise significant environmental issues associated with construction or operation of the 2021 Project and, therefore, the comment is acknowledged, and no further response is provided. It is acknowledged that the 2021 Project would be required to comply with the approved Remedial Action Plan (RAP) and all California Department of Toxic Substances (DTSC) requirements and regulations applicable to remediation and development of the Project Site.

(2) Comment Caltrans-2

As a reminder, the mission of Caltrans is to provide a safe and reliable transportation network that serves all people and respects the environment. Senate Bill 743 (2013) has been codified into CEQA law. It mandates that CEQA review of transportation impacts of proposed developments be modified by using Vehicle Miles Traveled (VMT) as the primary metric in identifying transportation impacts. As a reminder, Vehicle Miles Traveled (VMT) is the standard transportation analysis metric in CEQA for land use projects after the July 1, 2020 statewide implementation date. You may reference The Governor's Office of Planning and Research (OPR) website for more information.

<http://opr.ca.gov/ceqa/updates/guidelines/>

This development should incorporate multi-modal and complete streets transportation elements that will actively promote alternatives to car use and better manage existing parking assets. Prioritizing and allocating space to efficient modes of travel such as bicycling and public transit can allow streets to transport more people in a fixed amount of right-of-way.

Caltrans supports the implementation of complete streets and pedestrian safety measures such as road diets and other traffic calming measures. Please note the Federal Highway Administration (FHWA) recognizes the road diet treatment as a proven safety countermeasure, and the cost of a road diet can be significantly reduced if implemented in tandem with routine street resurfacing.

(a) Response Caltrans-2

The 2021 Draft SEIR addressed multi-modal and complete streets design elements included in the 2021 Project in Section II.J, *2021 Project Description*, pp. II-36 to II-38. All signalized intersections within the Project Site will provide protected pedestrian crossings. Buffered and striped bicycle paths will be provided along Stamps Drive from Del Amo Boulevard to Lenardo Drive and along Lenardo Drive from Main Street to the southeastern portion of the Project Site. Four bus stops with shelters are proposed on Lenardo Drive with service to be determined in coordination with Carson Circuit Transit System, the primary provider of mass transportation in the City of Carson; Long Beach Transit; the Los Angeles Metropolitan Transit Authority (Metro); Torrance Transit; and the Los Angeles Department of Transportation (LADOT). In addition, a shuttle funded by PA-1 and PA-2 will be available to employees and visitors to PA-3. The shuttle will provide connections to the Metro Blue Line Station. The VMT analysis did not include this as a mitigation measure.

Additionally, as addressed in Section IV.C, *Transportation*, pp. IV.C-17 and IV.C-18, the 2021 Project proposes to implement a Transportation Demand Management (TDM) program to help mitigate the significant VMT impact. The TDM program shall include unbundled parking for the residents of PA1, rideshare programs for the employees and residents of PA1 and PA3, a transit pass discount program for the employees and residents of PA1 and PA3, bicycle parking and bike share program for employees, visitors, and residents of PA1 and PA3, and a car share program for employees and residents of PA1 and PA3.

(3) Comment Caltrans-3

The 2021 Project is expected to produce total VMT per service population greater than the VMT impact threshold, and thus results in a significant VMT impact. Mitigation measures were proposed to reduce total VMT per service population for the Project, but the measures are not expected to reduce total VMT per service population below the VMT impact threshold, and therefore a significant and unavoidable VMT impact would remain.

For the City's consideration, we encourage the Lead Agency to evaluate the potential of Transportation Demand Management (TDM) strategies and Intelligent Transportation System (ITS) applications in order to better manage the transportation network, as well as transit service and bicycle or pedestrian connectivity improvements.

For additional TDM options, please refer to the Federal Highway Administration's *Integrating Demand Management into the Transportation Planning Process: A Desk Reference* (Chapter 8). This reference is available online at:

<http://www.ops.fhwa.dot.gov/publications/fhwahop12035/fhwahop12035.pdf>

(a) Response Caltrans-3

Refer to Response Caltrans-2 for a discussion of feasible TDM strategies, and transit, bicycle, and pedestrian connectivity improvements included in the 2021 Project.

(4) Comment Caltrans-4

We concur that *"the site on which the 2021 Project would be developed is comprised of approximately 157 acres located southwest of the San Diego Freeway (I-405) and north of the Avalon Boulevard Interchange. The Project proposes to provide signalized vehicular ingress and egress at three primary locations: Street "B" & Del Amo Boulevard, Street "A" & I-405 Southbound Ramps/Avalon Boulevard, and Main Street & Street "A"."*

(a) Response Caltrans-4

The comment does not raise significant environmental issues associated with construction or operation of the 2021 Project and, therefore, the comment is acknowledged, and no further response is provided.

(5) Comment Caltrans-5

Please be reminded that any work performed within the State right-of-way will require an Encroachment Permit from Caltrans if the improvement project is at State facility such as the signal improvement on I-405 Southbound ramps/Avalon Blvd. as mentioned above. Any modifications to State facilities must meet all mandatory design standard and specifications.

Storm water run-off is a sensitive issue for Los Angeles and Ventura counties. Please be mindful that projects should be designed to discharge clean run-off water. Additionally, discharge of storm water run-off is not permitted onto State highway facilities without any storm water management plan.

(a) Response Caltrans-5

The comment does not raise significant environmental issues associated with construction or operation of the 2021 Project; therefore, the comment is acknowledged, and no further response is provided. Regarding any worked performed with the State right-of-way, the 2021 Project would obtain any encroachment permits and meet all mandatory design standards and specifications, as need. As it relates to stormwater runoff, as discussed further Chapter VI, *Effects Not Found to Be Significant*, all stormwater from the Project Site would be contained in

an on-site drainage system and discharged to the Torrance Lateral in compliance with the City's drainage control requirements, which contain stringent regulatory requirements. New development proposed under the 2021 Project must include drainage control features that address water quality and water quantity control to minimize adverse effects to downstream locations.

(6) Comment Caltrans-6

Additionally, the project will generate heavy construction vehicles and worker personal vehicles during the construction period. Transportation of heavy construction equipment and/or materials, which requires the use of oversized-transport vehicles on State highways, will require a transportation permit from Caltrans. It is recommended that large size truck trips be limited to off-peak commute periods.

(a) Response Caltrans-6

The comment does not raise significant environmental issues associated with construction or operation of the 2021 Project and, therefore, the comment is acknowledged, and no further response is provided. As noted in this comment, a transportation permit will be obtained from Caltrans for the transportation of heavy construction equipment and/or materials, as needed during construction of the 2021 Project.

(7) Comment Caltrans-7

If you have any questions, please feel free to contact Mr. Alan Lin the project coordinator at (213) 269-1124 and refer to GTS # LA-2017-03748AL-NOP.

(a) Response Caltrans-7

This comment provides a conclusion to this comment letter. No response is provided.

c. South Coast Air Quality Management District (SCAQMD)

(1) Comment SCAQMD-1

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. The City of Carson is the California Environmental Quality Act (CEQA) Lead Agency for the Proposed Project. The following comments on the Draft SEIR include recommended revisions to the CEQA air dispersion modeling parameters and the localized NO₂ air quality impact analysis, recommended revisions to two existing project design features and one mitigation measure, and a discussion of South Coast AQMD permits that the Lead Agency should include in the Final SEIR.

(a) Response SCAQMD-1

This comment provides a general introduction. The comment does not raise significant environmental issues associated with construction or operation of the 2021 Project; therefore, the comment is acknowledged, and no further response is provided.

(2) Comment SCAQMD-2

Based on the Draft SEIR, the Proposed Project consists of construction and operation of 1,250 residential units, 745,300 square feet of commercial uses, 1,567,090 square feet of light industrial uses, and 273,906 square feet of park amenities/passive open space on a 157-acre site. The Proposed Project is located at 20400 South Main Street on the southeast corner of East Del Amo Boulevard and East Main Street within the City of Carson in the designated AB 617 Wilmington, Carson, West Long Beach community.

The Proposed Project site was formerly developed as a Class II Landfill site between 1959 through 1965 and received 6.2 million cubic yards of solid municipal waste and 7.8 million cubic yards of waste during operations. Since landfill closure, the site has undergone remediation activities under direction of two Remedial Action Plans (RAPs) prepared and approved by the Department of Toxic Substances Control (DTSC). The RAPs divided the 157-acre site into the Lower Operable Unit and the Upper Operable Unit, and each RAP was subject to separate CEQA clearance. As part of remediation efforts, Landfill Gas Control and Collection System components have been installed onsite, and additional components such as horizontal and vertical collector wells and piping will be installed in the future.

The Lead Agency has previously prepared several CEQA documents for the Proposed Project since 2006. The original 2006 Final EIR analyzed construction and operation of 1,995,125 square feet of commercial uses and 1,550 residential units¹. The Proposed Project was revised in 2018 to include construction and operation of 1,601,500 square feet of commercial uses, 1,250 residential units, and 350 hotel rooms. The City of Carson prepared a Final SEIR (also referred to as the 2018 Final SEIR) to analyze these changes² and certified it before approving the changes (referred to as the approved Project). The approved Project and the Proposed Project presented in this 2021 Draft SEIR remain unchanged in Planning Area (PA) 1 and PA 2; however, the Proposed Project analyzed in this 2021 Draft SEIR replaces the commercial uses in the approved Project with 1,567,090 square feet of light industrial uses and park amenities/passive open space³.

Construction of the Proposed Project is anticipated to occur in nine phases over three planning areas (PA 1, PA 2, and PA 3) and will begin in 2022. Beginning in 2024, PA 3 will be fully operational; PA 2 will follow in 2025; and PA 1 will be the last to be operational by 2026⁴. Construction within each PA will consist of remediation and relocation of landfill trash with

¹ Draft SEIR. Page II-8 to II-11.

² Ibid.

³ Ibid. Page II-15.

⁴ Ibid. Page IV.D-25.

backfilling, as required⁵. The Proposed Project will include 24 project design features for air quality. These features include requiring the use of Tier 4 construction equipment, or zero-emissions equipment where available, and 2014 or newer diesel fueled on-road heavy-duty haul trucks during construction activities, among others. During operations, project design features include a leasing preference to tenants with facility-owned and operated fleets that are alternative-fueled or zero-emissions, and a requirement that all owned or contracted fleets must meet or exceed 2014 model-year emissions standards, among others⁶. Once operational, the Proposed Project is anticipated to generate 42,791 trip-ends per day, 1,418 of which would be made by light-, medium-, and heavy-heavy-duty trucks traveling to and from PA 2 and PA 3⁷. Although the tenant for the Proposed Project is unknown, the Proposed Project may include up to 76,379 square feet of refrigerated logistics uses; therefore, 39 trucks are anticipated to include transportation refrigeration units (TRUs)⁸. However, only trucks with electric TRUs will be permitted to operate within the light industrial portion of PA 3, therefore only seven of the 39 trucks were analyzed as using a diesel-fueled TRU in the Draft SEIR⁹. Based on the Draft SEIR, existing off-site sensitive receptors are located to the south and west of the Project site, directly adjacent to the Proposed Project¹⁰.

(a) Response SCAQMD-2

The comment provides a description of the 2021 Project and does not raise significant environmental issues associated with construction or operation of the 2021 Project. Therefore, the comment is acknowledged, and no further response is provided.

(3) Comment SCAQMD-3

Based on a review of the Draft SEIR and supporting technical documents, South Coast AQMD staff has five main comments. A summary of these comments is provided as follows with additional details provided in the attachment.

(a) Response SCAQMD-3

This comment provides a general introduction to the comments raised in this letter. Responses to the comments contained in this letter are provided below in Responses SCAQMD-4 to SCAQMD-8 and SCAQMD-10 to SCAQMD-21.

(4) Comment SCAQMD-4

1. CEQA Air Dispersion Modeling Parameters: The air dispersion modeling performed in the Draft SEIR represented all heavy-duty trucks idling as discrete point sources and utilized

⁵ *Ibid.* Page II-45.

⁶ *Ibid.* Pages IV.D-38 to IV.D-43.

⁷ *Ibid.* Page IV.E-14.

⁸ *Ibid.* Pages IV.D-31 to IV.D-32.

⁹ *Ibid.*

¹⁰ *Draft SEIR.* Page IV.D-7.

hour-of-day variable emissions for stationary and mobile sources. South Coast AQMD staff recommends the Lead Agency use volume sources in the air dispersion model to represent heavy-duty truck idling and adjust the hour-of-day variable emission scalar such that a complete emission inventory for annual concentrations, which will then be used in HARP2 to calculate cancer risks, is modeled in the Final SEIR.

(a) Response SCAQMD-4

The 2021 Draft SEIR addressed the dispersion modeling in Section IV.D.5.a.(4)(d)(i), *Dispersion Modeling*, pp. IV.D-34 to IV.D-35, with supporting data provided in its Appendix D. Refer to Response SCAQMD-15 for a more detailed discussion regarding modeling truck idling as volume sources instead of point sources. In response to this comment, truck idling emissions were remodeled as volume sources and changes as a result of the modeling are outlined in Response SCAQMD-15.

Refer to Response SCAQMD-16 for a more thorough discussion of the variable emission scalar factors. The emission scalar factors used in the 2021 Draft SEIR accounts for non-continuous emission sources by utilizing a variable emission scalar based on the daily emission rates divided by the operational hours to align with the emissions scalars. The scalars were re-implemented into air dispersion modeling performed in response to the comments provided herein. Therefore, a complete emission inventory with annual concentrations was used in the CARB Hot Spots Analysis & Reporting Program (HARP2) to calculate cancer risk in the 2021 Draft SEIR. As shown in Response SCAQMD-15 and Response SCAQMD-16, the less-than-significant conclusion utilizing volume sources instead of point sources and the use of the emission scalar factors is the same as that presented in the 2021 Draft SEIR. No new significant impacts were identified.

(5) Comment SCAQMD-5

2. CEQA Air Quality Impact Analysis – Localized NO₂ Impacts Analysis: The Lead Agency analyzed the Proposed Project's localized NO₂ impacts by modeling the Project's own NO₂ concentrations and adding the peak concentration to a three-year average background NO₂ concentration. The Lead Agency should use the peak observed NO₂ background concentration over a three-year period instead of an averaged three-year background concentration to calculate the Proposed Project's NO₂ concentrations in the Final SEIR.

(a) Response SCAQMD-5

The 2021 Draft SEIR addressed the 2021 Project's localized NO₂ impact pursuant to the analysis set forth in IV.D, *Air Quality*, pp. IV.D-55 to IV.D-66, with supporting data provided in its Appendix D, pp. 112 and 113. The commenter requested that the localized NO₂ impact analysis use the peak observed NO₂ background concentration over a three-year period instead of an

averaged three-year maximum background concentration, which was previously used to calculate the 2021 Project’s NO₂ concentrations.

The approach used in the 2021 Draft SEIR is consistent with SCAQMD guidance related to the use of background concentrations for pollutants subject to the National Ambient Air Quality Standards (NAAQS).¹ The 1-hour NO₂ analysis used the 3-year average of the 98th percentile of the daily maximum 1-hour average background concentrations. In response to this comment, the 2021 Project’s localized 1-hour NO₂ California Ambient Air Quality Standard (CAAQS) and annual NO₂ NAAQS analyses were re-evaluated using the peak observed NO₂ concentration from the years 2017, 2018, and 2019 (the years for which the three-year average was used in the 2021 Draft SEIR). The results of this re-evaluation are provided below.

For the 1-hour NO₂ CAAQS, using the peak NO₂ concentrations for the background instead of the three-year average concentration added to the maximum 1-hour 2021 Project increment did not result in a change to the impact determination, as both construction and operational LST NO₂ concentrations would be below the significance thresholds and impacts would remain less than significant as concluded in the 2021 Draft SEIR. For the 1-hour NO₂ NAAQS, use of background concentrations consistent with the SCAQMD modeling guidance added to the maximum 1-hour 2021 Project increment did not result in a change to the impact determination, as both construction and operational LST NO₂ concentrations would be below the significance thresholds and impacts would remain less than significant as concluded in the 2021 Draft SEIR.

Based on the revised analysis described above, and updated in Appendix D1, the table below provides an updated construction summary table.

LST – Construction Summary

Pollutant	Averaging Period	Background (ug/m3)	Project (ug/m3)	Project + Background (ug/m3)	CAAQS (ug/m3)	NAAQS (ug/m3)	Exceed?
NO2	1-Hour (H1H)	154.8 168.6	14.1	168.9 182.6	339	N/A	no
	1-Hour (H8H)	120.5	13.2 14.1	133.7 134.6	N/A	188	no
	Annual	32.3 33.7	0.96	33.2 34.7	57	100	no

Table IV.D-9, pp. IV.D-56 and IV.D-57, of the 2021 Draft SEIR shall be revised as follows, and this revision has been incorporated into Chapter III, *Additions and Corrections to the 2021 Draft SEIR*:

¹ SCAQMD, *South Coast AQMD Modeling Guidance for AERMOD*, <http://www.aqmd.gov/home/air-quality/meteorological-data/modeling-guidance#Background>.

**Table IV.D-9
2021 Project Localized Construction Emissions (Unmitigated)**

	NOx	CO	PM10 ^a	PM2.5 ^a
Maximum Daily Emissions (LST Screening Analysis) (lbs/day)^b				
PA1	22	109	5	3
PA2	21	114	6	3
PA3	21	86	5	3
Maximum Daily (with overlapping phases)	52	310	14	7
SCAQMD Daily Screening Threshold	68	1,530	14	8
Potentially Significant?	No	No	Yes^c	No
2018 SEIR	66	627	49	18
<i>Difference (2021 Project minus 2018 SEIR)</i>	<i>(14)</i>	<i>(317)</i>	<i>(35)</i>	<i>(11)</i>
	NO ₂	CO	PM10	PM2.5
Maximum Daily Concentration (Dispersion Modeling) (µg/m³)^d				
Maximum Daily Impact (1-hour Highest)	469 <u>183</u>	—	—	—
Threshold	339	—	—	—
Maximum Daily Impact (1-hour 8th Highest)	434 <u>135</u>	—	—	—
Threshold	188	—	—	—
Maximum Daily Impact (24 hour)	—	—	1.98	—
Threshold	—	—	10.4	—
Maximum Daily Impact (Annual)	33 <u>35</u>	—	0.57	0.8
Threshold	57	—	1	10.4
Significant?	No	—	No	No
2018 SEIR (24 hour)	—	—	5	1.8
<i>Difference (2021 Project minus 2018 SEIR)</i>	<i>—</i>	<i>—</i>	<i>(3)</i>	<i>(1)</i>

SOURCE: ESA 2021.

NOTES:

Emissions quantities are rounded to “whole number” values. As such, the “total” values presented herein may be one unit more or less than actual values. Exact values (i.e., non-rounded) are provided in the CalEEMod model printout sheets and/or calculation worksheets that are presented in Appendix D1 of this 2021 SEIR.

- ^a PM10 emissions estimates are based on compliance with SCAQMD Rule 403 requirements for fugitive dust suppression, which require that no visible dust be present beyond the Project Site boundaries.
- ^b LST Screening Analysis and Screening thresholds are based on SCAQMD mass look-up screening levels for SRA 4 and conservatively assuming 5 acres of disturbance daily with sensitive receptors located within 25 meters of the Project Site. Mass look-up screening levels are based on allowable maximum emissions that would not cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standard, which is developed based on ambient concentrations of that pollutant for each specific SRA.
- ^c PM10 emissions are potentially significant under the SCAQMD mass lookup table screening analysis; therefore, an air dispersion modeling analysis was necessary to determine if the Project has significant construction emissions impacts.
- ^d Maximum Daily (with overlapping phases) takes into account the overall schedule and the overlap of subphases. The maximum planning area reports the maximum for each planning area, regardless of the subphase and in isolation from the other planning areas. Therefore, Maximum Daily emissions do not represent the sum of the individual planning area emissions as the maximum subphases for each may not overlap.

Based on the revised analysis described above, and updated in Appendix D1, the table below provides an updated construction summary table.

LST – Construction Summary

Pollutant	Averaging Period	Background (ug/m3)	Project (ug/m3)	Project + Background (ug/m3)	CAAQS (ug/m3)	NAAQS (ug/m3)	Exceed?
NO2	1-Hour (H1H)	454.8 168.6	18.47 21.8	473.0 190.4	339	N/A	no
	1-Hour (H8H)	120.5	13.49 21.8	133.7 142.3	N/A	188	no
	Annual	32.3 33.7	1.75 2.3	34.0 34.7	57	100	no

The revision above includes the modeling revisions from point sources to volume sources, as discussed in Response SCAQMD-15.

Additional revisions regarding 2021 Project’s operational NO₂ emissions from transportation refrigeration units (TRUs) have been made as part of Response SCAQMD-10 and Response SCAQMD-15. As a result of the TRU revisions, Table IV.D-11, p. IV.D-62, of the 2021 Draft SEIR shall be revised as follows (this revision includes the TRU emissions additions as well as modeling revisions from point sources to volume sources and includes TRU emissions) and this revision has been incorporated into Chapter III, *Additions and Corrections to the 2021 Draft SEIR*:

**Table IV.D-11
2021 Project Localized Operational Emissions (Unmitigated)**

	NOx	CO	PM10 ^a	PM2.5 ^a
Maximum Daily Emissions (Year 2026; Screening Analysis) (lbs/day)				
PA1	25	115	3	3
PA2	2	6	2	1
PA3	10	17	5	2
Maximum Daily	38	138	10	5
SCAQMD Daily Significance Threshold ^b	68	1,530	4	2
Potentially Significant?	No	No	Yes ^c	Yes ^c
2018 SEIR	53	164	14	11
Difference (2021 Project minus 2018 SEIR)	(15)	(26)	(4)	(6)
	NO ₂	CO	PM10	PM2.5
Maximum Daily Concentration (Year 2026; Refined Analysis) (µg/m³)				
Maximum Daily Impact (1-hour Highest)	473 <u>190</u>	—	—	—
Threshold	339	—	—	—
Maximum Daily Impact (1-hour 8th Highest)	434 <u>142</u>	—	—	—
Threshold	188	—	—	—
Maximum Daily Impact (24 hour)	—	—	2.09	—
Threshold	—	—	2.5	—
Maximum Daily Impact (Annual)	34 <u>36</u>	—	0.97	0.81
Threshold	57	—	1	2.5
Significant?	No	—	No	No
2018 SEIR (24 hour)	—	—	—	—
Difference (2021 Project minus 2018 SEIR)	—	—	—	—

SOURCE: ESA 2021.

NOTES:

Emissions quantities are rounded to “whole number” values. As such, the “total” values presented herein may be one unit more or less than actual values. Exact values (i.e., non-rounded) are provided in the CalEEMod model printout sheets and/or calculation worksheets that are presented in Appendix D1 of this 2021 SEIR.

^a PM10 emissions estimates are based on compliance with SCAQMD Rule 403 requirements for fugitive dust suppression, which require that no visible dust be present beyond the Project Site boundaries.

^b Significance thresholds are based on SCAQMD mass look-up screening levels for SRA 4 and conservatively assuming 5 acres of disturbance daily with sensitive receptors located within 25 meters of the Project Site. Mass look-up screening levels are based on allowable maximum emissions that would not cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standard, which is developed based on ambient concentrations of that pollutant for each specific SRA.

^c PM10 and PM2.5 emissions are potentially significant under the SCAQMD mass lookup table screening analysis; therefore, an air dispersion modeling analysis was necessary to determine if the Project has significant operations emissions impacts.

(6) Comment SCAQMD-6

3. Recommended Revisions to Existing Project Design Features (PDFs): The Lead Agency requires the use of clean off-road construction equipment if commercially available (2021 SEIR PDF-C1). Additional information on how commercial availability will be determined should be provided in the Final SEIR. Additionally, the Lead Agency should expand the requirement for using alternative-fueled and zero-emissions trucks during operation to all trucks accessing the Proposed Project, not limited to those trucks that are owned or contracted by warehouse tenants (2021 SEIR PDF-O16).

(a) Response SCAQMD-6

The 2021 Draft SEIR addressed the 2021 Project's project design features (PDFs) in Section IV.H.5.b.(2), *Project Design Features*. To make sure this definition of commercially available is clear, the 2021 Draft SEIR PDF-C1, p. IV.H-44, paragraph 3, sentence 12 of the 2021 Draft SEIR, has been revised as follows:

- 2021 SEIR PDF-C1:** Mobile off-road construction equipment (wheeled or tracked) used during construction of the ~~proposed modified Project~~ **2021 Project** shall meet the USEPA Tier 4 final standards, either as original equipment or equipment retrofitted to meet the Tier 4 final standards. In the event of specialized equipment use where Tier 4 equipment is not commercially available at the time of construction, then the equipment shall, at a minimum, meet the Tier 3 standard. Zero-emissions construction equipment shall be incorporated when commercially available. For purposes of this project design feature, "commercially available" is defined as equipment built by the original manufacturer and available for lease or hire within 20 miles of the City of Carson and available in a similar time frame to fossil-fueled options. If Tier 4 Final engine equipment or zero-emissions equipment is not commercially available, the contractor must show proof that the equipment is not commercially available by providing letters from at least two independent rental companies, each of which must own or operate a construction equipment fleet with total maximum horsepower of greater than 2,500 horsepower, for each piece of off-road equipment where the Tier 4 Final engine or zero-emissions equipment is not available. This requirement shall be incorporated into applicable bid documents, purchase orders, and contracts with successful contractors demonstrating 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 shall be available upon request at the time of mobilization of each applicable unit of equipment. (Modified from 2018 SEIR PDF Mitigation Measure G-6) (Applicable to PA1, PA2, and PA3; ~~zero-emissions construction equipment use is not required for PA2.~~)

This correction has also been incorporated into Chapter III, *Additions and Corrections to the 2021 Draft SEIR*.

Refer to Response SCAQMD-19 regarding expanding the requirement of 2021 Draft SEIR PDF-O16 regarding implementation of South Coast AQMD Rule 2305 – Warehouse Indirect Source

Rule to all trucks accessing the Project Site. As discussed in Response SCAQMD-19, 2021 Draft SEIR PDF-O16 has been modified to expand the requirements to all truck fleets accessing the 2021 Project's light industrial uses to further support and facilitate implementation of South Coast AQMD Rule 2305 – Warehouse Indirect Source Rule.

(7) Comment SCAQMD-7

4. Recommended Revisions to Existing Mitigation Measure (MM) G-7: The Lead Agency will require implementation of MM G-7 to reduce significant VOC emissions from architectural coatings to 74.9 pounds per day (lbs/day) by requiring either the use of low VOC content architectural coatings or no overlapping architectural coating phases. South Coast AQMD staff recommends the Lead Agency strengthen MM G-7 to include both requirements in the Final SEIR.

(a) Response SCAQMD-7

The 2021 Draft SEIR presents Mitigation Measure G-7 in Section IV, *Air Quality*, Subsection IV.D.6, Mitigation Measures, Table I-5, p. IV.D-68. The commenter recommends that Mitigation Measure G-7 include both components of the mitigation measure (low/no-VOC content for architectural coatings and ensuring that architectural coating activities for PA1 do not overlap with PA2). As discussed on 2021 Draft SEIR p. IV.D-78, implementation of Mitigation Measure G-7, would reduce VOC emissions from 113 lbs per day, as identified in 2021 Draft SEIR Table IV.D-6, to between 64 and 74.9 lbs per day depending on if construction phasing is staggered such that there is no overlap between architectural coating of PA1 and PA2 or low/no VOC coatings are used. As such, VOC emissions would be reduced to below 75 lbs per day using either method (as detailed in subsection IV.D.8a, Construction), and the potential project impact would be reduced to less than significant with the implementation of the identified mitigation measures. Thus, the 2021 Project would have a less-than-significant impact with mitigation, utilizing either of the components outlined in Mitigation Measure G-7 and both parts of the mitigation are not required to reduce VOC emissions to less than significant.

Although VOCs will be reduced under Mitigation Measure G-7 to below significance thresholds, Mitigation Measure G-7 will be modified, based on the comment request, as shown below. This correction has also been incorporated into Chapter III, *Additions and Corrections to the 2021 Draft SEIR*:

Mitigation Measure G-7: ~~The Applicant shall utilize coatings and solvents that are consistent with applicable SCAQMD rules and regulations. Should sub-phasing within any of the Planning Areas result in the overlap of construction and operation, construction shall be coordinated and managed to ensure that Property-wide coating activities would not result in the exceedance of maximum operational ROC emissions as shown in Table IV.G-14. Construction ROC emissions can be limited through the use of pre-fabricated and pre-coated~~

~~materials, limiting the amount of daily coating activities, and tenant coordination. To reduce VOC emissions associated with construction activities, painting within each of the planning areas would not overlap and would also use low-VOC paints pursuant to SCAQMD Rule 1113. the contractor for PA1 shall ensure that VOC emissions from architectural coating activities have low VOC content, or that architectural coating activities for PA1 do not occur at the same time as architectural coating activities for PA2. (Applicable to PA1, PA2, and PA3.)~~

(8) Comment SCAQMD-8

5. Responsible Agency and South Coast AQMD Permits: Since the Proposed Project will require the use of six new stationary source emergency generators, permit(s) from South Coast AQMD will be required. Additionally, due to ongoing remediation efforts that involve landfill excavation and landfill gas management, implementation of the Proposed Project may require additional permit(s) or plan approvals from South Coast AQMD. Therefore, the Lead Agency should identify South Coast AQMD as a CEQA Responsible Agency for the Proposed Project in the Final SEIR and consult early with South Coast AQMD Engineering and Permitting.

(a) Response SCAQMD-8

The 2021 Draft SEIR addressed Responsible Agencies in Section II.O, *2021 Project Approvals*, p. II-48. The commenter requests that if a permit from SCAQMD is required, SCAQMD is a Responsible Agency for the proposed 2021 Project and should be identified in the Final EIR. According to CEQA Guidelines Section 15381, a “responsible agency” for CEQA purposes, includes all public agencies other than the lead agency which have discretionary approval power over the project. Thus, by this definition, the SCAQMD is a responsible agency since it has discretionary approval over the emergency generators and the remediation activities through the permit process. Section II.O states “this 2021 Draft SEIR may be used by the City and other governmental entities, as responsible agencies, for all other approvals needed in connection with the 2021 Project, whether or not such agencies or specific approvals are listed below.”

Additionally, as mentioned in Section IV.D, *Air Quality*, the Project Site currently has five current SCAQMD Permits to operate associated with it (p. IV.D-9), and as discussed in 2021 SIER PDF-O2, all stationary-source emissions sources (e.g., landfill gas flares, emergency generators) would maintain appropriate SCAQMD permits (p. IV.D-40).

Is it acknowledged herein in this 2022 Final SEIR that the SCAQMD may be a Responsible Agency under CEQA for the 2021 Project if SCAQMD air quality permits or plan approvals are required.

(9) Comment SCAQMD-9

South Coast AQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact Alina Mullins, Air Quality

Specialist, at amullins@aqmd.gov, should you have any questions or wish to discuss the comments.

(a) Response SCAQMD-9

The comment does not raise significant environmental issues associated with construction or operation of the 2021 Project and, therefore, the comment is acknowledged, and no further response is provided.

(10) Comment SCAQMD-10

South Coast AQMD Staff's Summary of Air Quality Analysis and Health Risk Assessment in the Draft SEIR

In the Air Quality Analysis Section of the Draft SEIR, the Lead Agency quantified the Proposed Project's maximum daily construction and operational emissions and compared them to the respective South Coast AQMD's recommended regional and localized CEQA air quality significance thresholds. Additionally, the analysis was also compared against the air quality impact findings from the 2018 Final SEIR to determine if the 2021 Draft SEIR would result in new impacts or those that were more severe than those found in the 2018 Final SEIR.

Construction emissions in this Draft SEIR included emissions from landfill excavation, hauling due to trash relocation, and up to 450,000 cubic yards of soil import activities¹¹. Additionally, both the construction and operational impacts analysis accounted for emission reductions associated with implementation of 24 project design features (PDFs). PDFs for construction include, but are not limited to, the following: requirements for construction equipment to meet Tier 4 standards or Tier 3 standards at minimum with zero-emissions equipment to be incorporated as available; mobile off-road construction equipment less than 50 horsepower to be electric; idling restrictions of 2 minutes per occurrence; and on-road diesel fueled haul trucks to be model year 2014 or greater. For operation, PDFs include, but are not limited trip demand measures; electric landscaping equipment; minimum of 251 parking spaces be equipped with electric vehicle charging; electric on-site cargo handling equipment; electric plugs for TRUs and restrictions for diesel TRUs in PA 3; leasing preference to facility-owned and operated fleets that are alternative or zero emission; requirements for all owned or contracted fleets to meet or exceed 2014 model year emission standards; and lastly, tenants must ensure that all 75 percent of trucks model year 2021 and newer will be zero- or near-zero emissions by 2035 and 100 percent by 2040.

(a) Response SCAQMD-10

This comment provides a general summary of the 2021 Project's PDFs applicable to construction and operations used in the air quality analysis, Section IV.D, *Air Quality*, of the 2021 Draft

¹¹ Draft SEIR, Appendix D 1 Assumptions and 2 Air Quality Calculations.

SEIR. As this comment does not raise significant environmental issues associated with construction of the 2021 Project, the comment is acknowledged.

In the 2021 Draft SEIR, TRU emissions were not analyzed in operations as they were assumed to be negligible due to electric plug-in requirements from 2021 Draft SEIR PDF-O10 (p. IV.D-42). Any emissions from on-road travel, both off-site and on-site, from non-hybrid TRU vehicles (i.e., having small onboard diesel internal combustion engines), was assumed negligible relative to vehicle running exhaust emissions. However, to ensure a conservative analysis, TRU emissions resulting from on-road travel of non-hybrid vehicles were calculated and added to the 2021 Project operational emissions as part of this 2022 Final SEIR. Thus, Table IV.D-7, *2021 Project Regional Operational Emissions (Unmitigated) (lbs/day)*, and Table IV.D-14, *2021 Project Regional Operational Emissions (Mitigated) (lbs/day)*, of the 2021 Draft SEIR have been modified accordingly and are presented below. As evidenced in the tables below, emissions from TRUs would be negligible because of 2021 Draft SEIR PDF-O10, which requires TRUs to be electrically plugged-in when idling. As such, the significance conclusion including the TRU emissions resulting from on-road travel of non-hybrid vehicles would be the same as that analyzed in the 2021 Draft SEIR.

The 2021 Draft SEIR Table IV.D-7, p. IV.D-52 and Table IV.D-14, p. IV.D-81 have been revised as follows and these revisions have been incorporated into Chapter III, *Additions and Corrections to the 2021 Draft SEIR*:

Table IV.D-7
2021 Project Regional Operational Emissions (Unmitigated) (lbs/day)

	VOC	NOx	CO	SOx	PM10	PM2.5
Maximum Daily Emissions (Year 2026)						
Area	83	20	112	<1	2	2
Energy	1	7	4	<1	1	1
Mobile	130	476	1,182	5	461	129
<u>TRU</u>	<u><1</u>	<u><1</u>	<u><1</u>	<u><1</u>	<u><1</u>	<u><1</u>
Stationary ^a	4	5	37	<1	1	1
Total 2021 Project	218	508	1,335	6	465	132
SCAQMD Significance Threshold	55	55	550	150	150	55
Significant?	Yes	Yes	Yes	No	Yes	Yes
2018 SEIR	193	578	1,633	9	384	113
<i>Difference (2021 Project minus 2018 SEIR)</i>	25	(70)	(298)	(3)	81	19

**Table IV.D-7
2021 Project Regional Operational Emissions (Unmitigated) (lbs/day)**

	VOC	NOx	CO	SOx	PM10	PM2.5
Maximum Daily Emissions (2035)						
Area	83	20	112	<1	2	2
Energy	1	7	4	<1	1	1
Mobile	83	293	892	4	460	127
<u>TRU</u>	<u><1</u>	<u><1</u>	<u><1</u>	<u><1</u>	<u><1</u>	<u><1</u>
Stationary ^a	4	5	37	<1	1	1
Total 2021 Project	171	325	1,045	4	463	130
SCAQMD Significance Threshold	55	55	55	150	55	55
Significant?	Yes	Yes	Yes	No	Yes	Yes
2018 SEIR	193	578	1,633	9	384	113
<i>Difference (2021 Project minus 2018 SEIR)</i>	<i>(22)</i>	<i>(253)</i>	<i>(588)</i>	<i>(4)</i>	<i>80</i>	<i>18</i>
Maximum Daily Emissions (2040)						
Area	83	20	112	<1	2	2
Energy	1	7	4	<1	1	1
Mobile	67	169	803	3	459	126
<u>TRU</u>	<u><1</u>	<u><1</u>	<u><1</u>	<u><1</u>	<u><1</u>	<u><1</u>
Stationary ^a	4	5	37	<1	1	1
Total 2021 Project	155	201	956	4	463	130
SCAQMD Significance Threshold	55	55	550	150	150	55
Significant?	Yes	Yes	Yes	No	Yes	Yes
2018 SEIR	193	578	1,633	9	384	113
<i>Difference (2021 Project minus 2018 SEIR)</i>	<i>(38)</i>	<i>(377)</i>	<i>(677)</i>	<i>(5)</i>	<i>79</i>	<i>17</i>

SOURCE: ESA 2021.

NOTES:

Emissions quantities are rounded to "whole number" values. As such, the "total" values presented herein may be one unit more or less than actual values. Exact values (i.e., non-rounded) are provided in the CalEEMod model printout sheets and/or calculation worksheets that are presented in Appendix D1 of this 2021 SEIR.

^a Emissions due to Stationary Sources are from the operation of the on-site flare system, LGCCS, and Condensate System.

Table IV.D-14
2021 Project Regional Operational Emissions (Mitigated) (lbs/day)

	VOC	NOx	CO	SOx	PM10	PM2.5
Maximum Daily Emissions (Year 2026)						
Area	80	1	104	0	1	1
Energy	1	7	4	0	1	1
Mobile	130	476	1,182	5	461	129
<u>TRU</u>	<1	<1	<1	<1	<1	<1
Stationary ^a	4	5	37	0	1	1
Total 2021 Project	216	490	1,327	6	463	131
SCAQMD Significance Threshold	55	55	550	150	150	55
Significant?	Yes	Yes	Yes	No	Yes	Yes
2018 SEIR	193	578	1,633	9	384	113
<i>Difference (2021 Project minus 2018 SEIR)</i>	23	(89)	(306)	(3)	80	18
Maximum Daily Emissions (Year 2035)						
Area	80	1	104	0	1	1
Energy	1	7	4	0	1	1
Mobile	83	293	892	4	460	127
<u>TRU</u>	<1	<1	<1	<1	<1	<1
Stationary ^a	4	5	37	0	1	1
Total 2021 Project	169	306	1,037	4	462	129
SCAQMD Significance Threshold	55	55	550	150	150	55
Significant?	Yes	Yes	Yes	No	Yes	Yes
2018 SEIR	193	578	1,633	9	384	113
<i>Difference (2021 Project minus 2018 SEIR)</i>	(24)	(272)	(596)	(4)	78	16
Maximum Daily Emissions (Year 2040)						
Area	80	1	104	0	1	1
Energy	1	7	4	0	1	1
Mobile	67	169	803	3	459	126
<u>TRU</u>	<1	<1	<1	<1	<1	<1
Stationary ^a	4	5	37	0	1	1
Total 2021 Project	153	183	948	4	461	128
SCAQMD Significance Threshold	55	55	550	150	150	55
Significant?	Yes	Yes	Yes	No	Yes	Yes
2018 SEIR	193	578	1,633	9	384	113
<i>Difference (2021 Project minus 2018 SEIR)</i>	(40)	(396)	(685)	(5)	78	15

SOURCE: ESA 2021.

NOTES:

Emissions quantities are rounded to "whole number" values. As such, the "total" values presented herein may be one unit more or less than actual values. Exact values (i.e., non-rounded) are provided in the CalEEMod model printout sheets and/or calculation worksheets that are presented in Appendix D1 of this 2021 SEIR.

^a Emissions due to stationary sources are from the operation of the on-site flare system.

(11) Comment SCAQMD-11

Based on the analysis, the Lead Agency found that construction of the Proposed Project would result in 113 pounds per day (lbs/day) of VOC emissions¹², which is above South Coast AQMD's CEQA significance threshold for regional construction VOC emissions at 75 lbs/day. Mitigation Measure (MM) G-7 would require the use of low VOC content architectural coatings or require a restriction on overlapping architectural coating activities between PA 1 and PA 2. With implementation of this mitigation measures, regional construction VOC emissions were reduced to less than significant between 64 lbs/day to 74.9 lbs/day, depending on which portion of MM G-7 is selected¹³.

(a) Response SCAQMD-11

The 2021 Draft SEIR discusses construction VOC emissions in Section IV.D, Air Quality, subsection IV.D.8a, Construction, p. IV.D-77, with supporting data provided in Appendix D. With incorporation of Mitigation Measure G-7, VOC emissions would be below the SCAQMD significance threshold and VOC impacts would be less than significant. In addition, refer to Response SCAQMD-7 for a more detailed discussion of modifications to strengthen Mitigation Measure G-7.

(12) Comment SCAQMD-12

The Lead Agency also found that that the Proposed Project's regional operational air quality impacts would be significant for VOC, NO_x, CO, PM₁₀, and PM_{2.5}¹⁴. Implementation of MMs G-12 to G-13, G-15 to G-21, G-25, G-29, and C-18 would require various emission reduction measures such as energy efficient lighting; delivery schedules that avoid overlap or peak hours; priority parking for clean air vehicles; implementation of a transportation demand management program. However, the Lead Agency found that operation of the Proposed Project would still result in significant and unavoidable air quality impacts for VOC, NO_x, CO, PM₁₀, and PM_{2.5}¹⁵. The Lead Agency also quantified air quality impacts from overlapping construction and operation activities and compared the overlapping emissions to South Coast AQMD's recommended air quality CEQA significance threshold for operation. Based on the analysis, the Lead Agency found that overlapping activities would result in significant and unavoidable air quality impacts for VOC, NO_x, CO, PM₁₀, and PM_{2.5}¹⁶.

(a) Response SCAQMD-12

This comment provides a general summary of the 2021 Project's regional operational air quality emissions and impacts and PDFs and mitigation measures applicable to operations used in the air

¹² *Ibid.* Table IV.D-6, Page IV.D-51.

¹³ *Ibid.* Page IV.D-78.

¹⁴ *Ibid.* Table IV.D-7, Page IV.D-52.

¹⁵ *Ibid.* Page IV.D-73.

¹⁶ *Ibid.* Page IV.D-54.

quality analysis, Section IV.D, *Air Quality*, of the 2021 Draft SEIR. As this comment does not raise significant environmental issues associated with operational emissions of the 2021 Project, the comment is acknowledged, and no further response is provided.

(13) Comment SCAQMD-13

In the Draft SEIR, the Lead Agency quantified the Proposed Project's localized construction and operational emissions and compared them to the applicable South Coast AQMD's localized significance thresholds. Based on the analysis, the Lead Agency found that the Proposed Project's localized construction and operational air quality impacts would be less than significant¹⁷.

(a) Response SCAQMD-13

This comment provides a general summary of the 2021 Project's localized construction and operational air quality emissions and impacts as analyzed in the air quality analysis, Section IV.D, *Air Quality*, of the 2021 Draft SEIR. As this comment does not raise significant environmental issues associated with the localized construction and operational emissions of the 2021 Project, the comment is acknowledged, and no further response is provided.

(14) Comment SCAQMD-14

Additionally, the Lead Agency calculated cancer risks from Proposed Project's construction and operational activities and took into consideration the cancer risk to the on-site residential receptors being developed in PA 1 of the Proposed Project for informational purposes only. Based on the analysis, the Lead Agency found that the cancer inhalation risk from construction activities would be 4.41 in one million; cancer inhalation risk from operation would be 1.1 in one million¹⁸. Both construction and operational cancer risks were found to be below South Coast AQMD's CEQA significance threshold of 10 in one million for cancer risk¹⁹. Finally, the Lead Agency discussed South Coast AQMD Rules 2305 and 316 in the Draft SEIR²⁰.

(a) Response SCAQMD-14

This comment provides a general summary of the 2021 Project's construction and operational cancer risks to on-site residential receptors used for informational purposes only, as provided in Section IV.D, *Air Quality*, of the 2021 Draft SEIR. It also acknowledges that SCAQMD Rules 2305 and 316 were discussed in the 2021 Draft SEIR. As this comment does not raise significant environmental issues associated with cancer risks to on-site residential receptors resulting from the 2021 Project, the comment is acknowledged, and no further response is provided.

¹⁷ *Ibid.* Pages IV.D-55 to IV.D-62.

¹⁸ *Ibid.* Page IV.D-64.

¹⁹ South Coast AQMD's CEQA significance threshold of 10 in one million for cancer risk is based on the most current methodology recommended by the California Office of Environmental Health Hazard assessment.

²⁰ Draft SEIR. Pages IV.G-13 to IV.G-14.

(15) Comment SCAQMD-15

1. CEQA Air Dispersion Modeling Parameters

Based on a review of the air dispersion modeling performed using AERMOD, South Coast AQMD staff has the following comments regarding the modeling parameters.

a) *Truck Idling Modeled as Point Sources*

South Coast AQMD staff found that the Lead Agency modeled truck idling as discrete point sources in various locations within the Proposed Project site. The Proposed Project will have 1,418 daily truck trips. Due to the nature of warehousing and commercial operations, it is reasonably foreseeable that truck idling may occur across the entire Proposed Project site including ingress or egress from the site, and not limited to discrete locations modeled in AERMOD. Additionally, modeling point sources in AERMOD requires specific information about a source's stack, such as the temperature, velocity, and flow rate exiting the stack and the stack's diameter. It is reasonably foreseeable that the Proposed Project will service a diverse truck fleet with different engines and exhaust systems, and that not every truck will have stack parameters similar to the ones used in the modeling. Therefore, South Coast AQMD staff recommends that the Lead Agency use a series of volume sources to account for onsite truck idling. Alternatively, the Lead Agency can provide additional information to justify that modeling truck idling as discrete point across the Proposed Project site is appropriate. When modeling idling emissions from a truck with cargo container as a point source, it is important to note that the cargo container has a downwash effect on the plume released from nearby stacks such that wind flowing over or around the container creates a cavity of recirculating winds in the area near the container, and the cavity causes increased vertical dispersion of plumes emitted from stacks on or near the container. Therefore, the building downwash parameters should be used in AERMOD.

(a) *Response SCAQMD-15*

The 2021 Draft SEIR addressed the dispersion modeling in Section IV.D.5.a.(4)(d)(i), *Dispersion Modeling*, pp. IV.D-34 to IV.D-35, with supporting data provided in Appendix D. The commenter requested that truck idling be modeled as volume sources instead of point sources and to account for the building downwash effect for point sources. Although point sources represent a vertical flow of air dispersion from hot exhaust sources, like those of idling trucks, the 2021 Project has been remodeled using volume sources for truck idling sources instead of point sources in response to this comment. Volume source parameters were based on information provided in the US EPA's 2012 *Haul Road Working Group Final Report*² and the US DOT FHA's 2019 *Federal Size Regulations for Commercial Motor Vehicles*.³ Stationary sources (i.e., emergency backup generator exhaust) remained as point sources. To account for the

² https://www.epa.gov/sites/default/files/2020-10/documents/haul_road_workgroup-final_report_package-20120302.pdf

³ https://ops.fhwa.dot.gov/freight/publications/size_regs_final_rpt/

building downwash effect for point sources, building parameters were used for the remaining stationary point sources. The 2021 Draft SEIR Table IV.D-11, p. IV.D-62, has been modified as shown in Response SCAQMD-5, and this revision has been incorporated into Chapter III, *Additions and Corrections to the 2021 Draft SEIR*.

As shown in revisions to Table IV.D-11 shown in Response SCAQMD-5, the significance conclusion utilizing volume sources instead of point sources is the same as that presented in the 2021 Draft SEIR.

(16) Comment SCAQMD-16

b) Use of Hour-of-Day Variable Emissions

The Lead Agency modeled multiple stationary and mobile sources using the hour-of-day variable emission factor option in AERMOD to account for the sources' non-continuous operations. The stationary and mobile sources were assumed to operate for only 16 hours per day²¹. The resulting concentrations were then used to calculate construction and operational cancer risks using HARP2. However, in doing so, the Lead Agency did not properly account for concentrations from non-continuous operations. According to the HARP2 User Guide, in order to maintain a consistent emission inventory when the hour of day option is selected, annual emissions are required to sum to 31,536 kg/yr (i.e. $31,536 \text{ kg/yr} = 1 \text{ g/s} * 3600 \text{ s/hr} * 8760 \text{ hr/yr}$)²². Because of this requirement, hourly emissions should be adjusted accordingly when using variable emissions. For example, if the stationary sources will only operate for 16 hours a day, then an adjustment to the variable emission scalar is needed and should be 1.5 (i.e. $1.5 \text{ g/s} * 3600 \text{ s/hr} * 5,840 \text{ hr/yr} = 31,536 \text{ kg/yr}$).

(a) Response SCAQMD-16

The 2021 Draft SEIR addressed the dispersion modeling in Section IV.D.5.a.(4)(d)(i), *Dispersion Modeling*, pp. IV.D-34 to IV.D-35, with supporting data provided in Appendix D. The commenter states that the 2021 Project didn't properly account for concentrations from non-continuous operations. The AERMOD air dispersion model allows for the use of scalars to vary emissions on an hourly basis to represent the actual occurrences of activity. A scalar is a real number (fraction or integer) that has a magnitude but not a direction and is often used as a multiplicative modifier. For example, if a project's construction emissions are generated during a workday from 7:00 a.m. to 4:00 p.m., a scalar factor of 1 could be assigned to the 7:00 a.m. to 4:00 p.m. time period when construction activity is occurring and a scalar factor of 0 could be assigned to the 4:00 p.m. to 7:00 a.m. time period when construction activity is not taking place during the overnight hours. If scalar factors are not assigned properly, the emissions and corresponding modeled concentrations could be underreported as the commenter suggests.

²¹ *Draft SEIR, Appendix D, 5d.iii.*

²² *User Manual for HARP2, Pages 31 to 32. Accessed at: <https://ww2.arb.ca.gov/sites/default/files/classic/toxics/harp/docs2/harp2admrtuserguide.pdf>.*

The scalars used in the AERMOD dispersion modeling for the 2021 Project, as revised in this 2022 Final SEIR, were verified for accuracy of implementation in response to this comment. Scalars were not applied to equipment that is assumed to operate continuously, but rather only to equipment that is assumed to operate less than 24 hours per day. The scalars were based on the daily emissions from the equipment for the total time the equipment would be operated (for example, some equipment would operate for 16 hours in a day). To obtain the scalar value, the daily emissions from each piece of equipment were divided by the number of hours that equipment would operate each day (e.g., 16 hours, not the full 24-hour day). This yields a scalar which gives emissions in grams/second by piece of equipment. A scalar factor of zero is assigned to non-operating hours in the dispersion model that produce no emissions in order to zero out any potential modeled concentrations from these non-operating hours. The dispersion modeling used a scalar of 1.0 for those hours the equipment would be operating. Therefore, the emission scalars used in the HARP2 model, as revised in this 2022 Final SEIR, are justified and accounted for both continuous and non-continuous equipment operations. Thus, the revised modeling in this 2022 Final SEIR properly accounts for concentrations from non-continuous operations for the 2021 Project. The results of the HARP2 analysis, as revised in this 2022 Final SEIR, which includes verification of the scalar factors as discussed above, use of volume sources for truck idling as discussed in Response SCAQMD-15.

Additional technical modifications to the emissions analysis and associated health risk assessment (HRA) were made, which includes minor reassessment of operational emissions from TRUs. Table IV.D-7, *2021 Project Regional Operational Emissions (Unmitigated) (lbs/day)*, and Table IV.D-14, *2021 Project Regional Operational Emissions (Mitigated) (lbs/day)*, of the 2021 Draft SEIR have been modified accordingly to account for these minor operational emissions from TRUs. As evidenced in these tables, emissions from TRUs would be negligible because of the 2021 Draft SEIR PDF-O10, which requires TRUs to be electric plug-ins when on-site. Further, any potential impacts from usage of onboard diesel internal combustion engines while traveling on-road would not be substantial. The significance determinations for all studied air pollutants remains unchanged after inclusion of the negligible TRU emissions. The 2021 Draft SEIR Table IV.D-7, p. IV.D-52, and Table IV.D-14, p. IV.D-81, were revised as shown in Response SCAQMD-10, and those revisions have also been incorporated into Chapter III, *Additions and Corrections to the 2021 Draft SEIR*.

For the HRA, emissions were added from TRUs for on-road off-site and on-site travel. Idling restrictions were applied per the Airborne Toxic Control Measure for In-Use Diesel-Fueled Transport Refrigeration Units (TRU) and TRU Generator Sets, and Facilities Where TRUs Operate. Additionally, the EMFAC2021 emissions factors were obtained for TRUs and used for emissions calculations. These parameters were included in the air dispersion modeling and the emissions were added to the CARB Hot Spots Analysis & Reporting Program (HARP2) model to determine the cancer risk. The operational cancer risk is presented in Table IV.D-12, *2021*

Project Combined Risk (Unmitigated), p. IV.D-64 of the 2021 Draft SEIR. Based on the HRA remodeling, this table will be modified as follows, and this correction has also been incorporated into Chapter III, *Additions and Corrections to the 2021 Draft SEIR*:

**Table IV.D-12
2021 Project Combined Risk (Unmitigated)**

	Cancer Risk (per million)				
	Total	Construction	Operational	Chronic	Acute
8-Year Construction Risk Scenario					
Off-Site Receptor #37	4.33 <u>1.63</u>	0.97	0.36 <u>0.66</u>	0.0005 <u><0.01</u>	0.0003 <u><0.01</u>
DD3 Receptor #725	0.70 <u>1.02</u>	0.52	0.18 <u>0.65</u>	0.0008 <u><0.01</u>	0.0004 <u><0.01</u>
On-Site Receptor #17887 ^a	0.36 <u>0.78</u>	—	0.36 <u>0.78</u>	0.00032 <u><0.01</u>	0.00007 <u><0.01</u>
Carson Country Mart, Receptor #94937 ^b	0.46 <u>1.16</u>	—	0.46 <u>1.16</u>	0.00044 <u><0.01</u>	0.000045 <u><0.01</u>
4-Year Construction Risk Scenario					
Off-Site Receptor #37	4.44 <u>4.81</u>	3.93	0.48 <u>0.88</u>	0.004 <u><0.01</u>	0.0003 <u><0.01</u>
DD3 Receptor #725	1.72 <u>2.16</u>	1.29	0.43 <u>0.87</u>	0.002 <u><0.01</u>	0.0040 <u><0.01</u>
On-Site Receptor #17887 ^a	0.48 <u>1.05</u>	—	0.48 <u>1.05</u>	0.00030 <u><0.01</u>	0.00007 <u><0.01</u>
Carson Country Mart, Receptor #94937 ^b	0.62 <u>1.58</u>	—	0.62 <u>1.58</u>	0.00044 <u><0.01</u>	0.000045 <u><0.01</u>
30-Year Operational Risk Scenario					
Off-Site Receptor #3788	1.10 <u>2.81</u>	—	1.10 <u>2.81</u>	0.00033 <u><0.01</u>	<u><0.01</u>
DD3 Receptor #725693	0.98 <u>1.90</u>	—	0.98 <u>1.90</u>	0.00029 <u><0.01</u>	<u><0.01</u>
On-Site Receptor #17887 ^a	1.10 <u>2.27</u>	—	1.10 <u>2.27</u>	0.00033 <u><0.01</u>	<u><0.01</u>
Carson Country Mart, Receptor #94937 ^b	1.40 <u>3.40</u>	—	1.40 <u>3.40</u>	0.00044 <u><0.01</u>	<u><0.01</u>
SCAQMD Numeric Indicators	10			1	1
Significant?	No			No	No
2018 SEIR Reported Values					
Off-Site Receptor ^c	2.7	0	2.7	<0.01	<0.01
DD3 Receptor ^c	2.1	0	2.7	<0.01	<0.01
On-Site Receptor	3.6	N/A	3.6	<0.01	<0.01

**Table IV.D-12
2021 Project Combined Risk (Unmitigated)**

	Cancer Risk (per million)				
	Total	Construction	Operational	Chronic	Acute
SOURCE: ESA 2021.					
NOTES:					
<i>Risk is rounded. As such, the "total" values presented herein may be one unit more or less than actual values. Exact values (i.e., non-rounded) are provided in Appendix D1 of this 2021 SEIR.</i>					
<i>The 8-year construction scenario includes risk from construction of the 2021 Project beginning with horizontal construction of PA2 in 2018 and ending with 22 years of operational activities after construction of the 2021 Project is completed. The 4-year construction scenario does not include the horizontal construction of PA2 that was completed in 2018 and 2019 and ending with 26 years of operational activities after the 2021 Project is completed. The 30-year scenario only takes into account 30 years of operational activities after construction is completed.</i>					
<i>^a While the 2021 Project/2018 Project is not required to determine risk to itself, the risk to on-site receptors from operation of the Project Site is provided for informational purposes and is not included as part of the significance finding.</i>					
<i>^b Carson Country Mart receptors are conservatively estimated as residential receptors as a worst-case risk potential for those in the nearby neighborhoods.</i>					
<i>^c Construction emissions show 0.0 for all receptors because as on-site truck emissions during operation represent the greatest portion of risk, risk is higher for receptors when the 30-year risk is all operational related. Construction emissions are low (as seen in Table IV.B-2). This analysis represents the worst-case scenario.</i>					

As shown in the above tables, the HRA was remodeled to account for the DPM emissions from TRUs and the significance conclusions to all pollutant impact areas remains unchanged after inclusion of the negligible TRU emissions.

(17) Comment SCAQMD-17

2. CEQA Air Quality Impacts Analysis – Localized NO2 Impacts Analysis

In the Draft SEIR, the Lead Agency analyzed the Proposed Project's localized NO₂ impacts by modeling the Proposed Project's own NO₂ concentrations in AERMOD and adding the resulting maximum concentration from the Proposed Project itself to a three-year average background concentration²³. Based on this analysis, the Lead Agency found that localized NO₂ impacts would be less than significant. The Lead Agency's use of a three-year average background concentration is not appropriate. As discussed in the South Coast AQMD's Final Localized Significance Threshold Methodology, when determining whether or not construction activities would create significant adverse localized air quality impacts, the observed peak concentrations for a three-year period should be utilized²⁴. Therefore, South Coast AQMD staff recommends the Lead Agency revise the localized NO₂ impacts analysis to identify the peak background NO₂ concentration observed over the last three years of available monitoring data (not a three-year average NO₂ background concentration) and add that concentration to the Proposed Project's own peak NO₂ concentration for comparison to the NAAQS and CAAQS.

²³ Draft SEIR. Appendix D. The District at South Bay LST - Monitoring Data. PDF page 110.

²⁴ South Coast AQMD Final Localized Significance Threshold Methodology. Accessed at: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/final-lst-methodology-document.pdf>.

(a) Response SCAQMD-17

Refer to Response SCAQMD-5 for a discussion of the requested revision to utilize the maximum NO₂ concentration over that last three years instead of the average NO₂ concentration over that last three years. As discussed in Response SCAQMD-5, NO₂ concentrations would not exceed the significance thresholds and impacts would remain the same as disclosed in the 2021 Draft SEIR.

(18) Comment SCAQMD-18**3. Recommended Revisions to Existing Project Design Features (PDFs)***a) 2021 SEIR PDF-C1*

2021 SEIR PDF-C1 requires that the during construction, all off-road equipment meet Tier 4 Final emission standards, with a minimum requirement to meet Tier 3 standards if Tier 4 is not commercially available when construction begins. Additionally, the PDF requires that zero-emission construction equipment be incorporated when commercially available. South Coast AQMD staff recommends that the Lead Agency provide additional information on how “availability” will be defined and determined in the Final SEIR. The recommended information would establish a clear set of standards and criteria for assessing the commercial availability and feasibility of using both Tier 4 Final and zero-emission construction equipment, provide public transparency in the Lead Agency’s decision-making regarding Tier 4 Final and zero-emission construction equipment, demonstrate a commitment by the Lead Agency to using Tier 4 Final and zero-emission construction equipment, ensure implementation of Tier 4 Final and zero-emission construction equipment when it is available, strengthen the Proposed Project’s mitigation monitoring and reporting program, and facilitate the purpose and goal of CEQA on public disclosure.

(a) Response SCAQMD-18

Refer to Response SCAQMD-6 for a discussion of the requested revision to 2021 Draft SEIR PDF-C1 regarding commercial availability of Tier 4 final engines and zero-emissions equipment. As discussed therein, 2021 Draft SEIR PDF-C1 has been modified in the 2022 Final SEIR to provide additional information on how “commercial availability” is defined and determined in the Final SEIR.

(19) Comment SCAQMD-19*b) 2021 SEIR PDF-O16*

2021 SEIR PDF-O16 requires 1) for the industrial uses within PA 3, a leasing preference will be given to prospective tenants that have facility-owned and operated fleets that are alternative or zero-emissions; 2) all owned and contracted fleets shall meet or exceed the 2014 model-year emissions equivalent engine standards; 3) light industrial tenants will ensure that all truck models 2021 and newer are 75 percent zero-emissions or near-zero emissions by 2035 and

100 percent zero-emissions or near-zero emissions by 2040; and 4) all operators are to maintain records demonstrating compliance with these requirements and make the records available for inspection purposes. Since the Proposed Project will have different tenants/owners and operators and to further reduce the Proposed Project's significant and unavoidable NOx emissions during operation, South Coast AQMD staff recommends that the Lead Agency strengthen the PDF as follows to require the use of alternative-fueled and zero-emissions trucks during operation by all trucks accessing the Proposed Project, not limited to those trucks that are owned or contracted by warehouse tenants. This recommendation would support and facilitate implementation of South Coast AQMD Rule 2305 – Warehouse Indirect Source Rule.

2021 SEIR PDF-O16: For the uses within PA 3(a), leasing preference shall be given to prospective tenants with facility-owned and operated fleet that is alternative/zero-emissions. At a minimum, warehouse tenants/owners and/or operators shall ensure that all truck fleets accessing the Proposed Project's industrial uses ~~All owned and contracted fleets~~ shall meet or exceed the 2014 model-year emissions equivalent engine standards as currently define in the California Code of Regulations title 13, Division 3, Chapter 1, Article 4.5. Section 2025. Light Industrial tenants shall ensure that of all trucks of model year 2021 and newer 75 percent will be zero- or near-zero-emission vehicles by 20235, and 100 percent zero- or near-zero-emission vehicles by 2040. Facility operators shall maintain records on site demonstrating compliance with this requirement and shall make records a viable to inspection by local jurisdiction, air districts, and the State upon request.

(a) Response SCAQMD-19

2021 Draft SEIR PDF-O16 has been modified based on the request in the comment to support and facilitate implementation of South Coast AQMD Rule 2305 – Warehouse Indirect Source Rule. The modifications are shown below. This modification has been incorporated into Chapter III, *Additions and Corrections to the 2021 Draft SEIR*. This modification also responds to an earlier comment (refer to Response SCAQMD-6).

- 2021 SEIR PDF-O16:** For the uses within PA3(a), leasing preference shall be given to prospective tenants with a facility-owned and operated fleet that is alternative/zero-emissions. ~~All owned or contracted fleets~~ At a minimum, warehouse tenants/owners and/or operators shall ensure that all truck fleets accessing the 2021 Project's light industrial uses shall meet or exceed the 2014 model-year emissions equivalent engine standards as currently defined in California Code of Regulations Title 13, Division 3, Chapter 1, Article 4.5, Section 2025. Light Industrial tenants shall ensure that of all trucks of model year 2021 and newer 75 percent will be zero- or near-zero-emissions vehicles by 2035, and 100 percent zero- or near-zero-emissions vehicles by 2040. Facility operators shall maintain records on site demonstrating compliance with this requirement and shall make records available to inspection by local jurisdiction, air districts, and the State upon request. (Applicable to the uses in PA3(a).)

(20) Comment SCAQMD-20

4. Recommended Revisions to Existing Mitigation Measure (MM) G-7

In the Draft SEIR, the Lead Agency found that the Proposed Project would result in 64 lbs/day to 74.9 lbs/day of VOC emissions after implementation of MM G-7, which offers two mutually exclusive options to reduce VOC emissions from architectural coating during construction. These options require that either the construction contractor ensure that architectural coatings have either low or no VOC content, or that architectural coating activities between PA 1 and PA 2 do not overlap. Since it is not known at this time what option within MM G-7 will be utilized, VOC emissions from construction may be 74.9 lbs/day, which is just slightly below South Coast AQMD's recommended CEQA significance threshold for VOC emissions during construction at 75 lbs/day. CEQA requires that the Lead Agency consider all feasible mitigation measures that go beyond what is required by law be utilized to minimize or eliminate any significant adverse impacts. Therefore, South Coast AQMD staff recommends that the Lead Agency revise MM G-7 as follows to require both options be utilized to further reduce VOC emissions during construction:

Mitigation Measure G-7: To reduce VOC emissions associated with construction activities, the contractor for PA 1 shall ensure that VOC emissions from architectural coating activities have low/no VOC content ~~or~~ and ensure that architectural coating activities for PA 1 do not occur at the same time as architectural coating activities for PA 2.

(a) *Response SCAQMD-20*

Refer to Response SCAQMD-7 for a discussion of the requested revision to Mitigation Measure G-7. A modification to Mitigation Measure G-7 has been incorporated as discussed therein.

(21) Comment SCAQMD-21

5. Responsible Agency and South Coast AQMD Permits

The Draft SEIR contemplates the use of six new stationary source emergency generators to be installed and operated within the industrial area of the Proposed Project. Since implementation of the Proposed Project requires the use of stationary equipment, including but may not be limited to, emergency generator(s), permits from South Coast AQMD are required. Additionally, due to the site's historical usage as a former landfill and due to the ongoing remediation efforts, including landfill excavation and waste relocation, implementation of the Proposed Project may require additional permits or landfill excavation plans to be approved by South Coast AQMD. Therefore, South Coast AQMD staff recommends the Lead Agency consult with South Coast AQMD Engineering and Permitting to identify additional South Coast AQMD rules and regulations that the Proposed Project may be subject to. The Final SEIR should include a list of stationary equipment that will require South Coast AQMD permits and identify South Coast AQMD as a Responsible Agency for the Proposed Project. Any assumptions used in the Final SEIR will be used as the basis for permit conditions and limits for the Proposed Project. The 2015 revised Office of Environmental Health Hazard Assessment (OEHHA) methodology is

being used by South Coast AQMD for determining operational health risks for permitting applications and also for all CEQA projects where South Coast AQMD is the Lead Agency. Please contact South Coast AQMD's Engineering and Permitting staff at (909) 396-3385 for questions on permits. For more general information on permits, please visit South Coast AQMD's webpage at: <http://www.aqmd.gov/home/permits>.

(a) Response SCAQMD-21

Refer to Response SCAQMD-8 for a discussion regarding the SCAQMD as a Responsible Agency. SCAQMD permits will be required for landfill gas flares and emergency generators and the Lead Agency will consult with the SCAQMD Engineering and Permitting staff regarding SCAQMD rules and regulations as appropriate. A list of SCAQMD Rules and Regulations that are relevant to the 2021 Project are discussed in Section IV.D.3.c.(1), *South Coast Air Quality Management District*. Additionally, the 2021 Draft SEIR discusses the permitted stationary sources in Section IV.D.5.a.(3), *Operational Impacts*, which include uses such as the landfill gas collection and control system, groundwater extraction and treatment system, and six emergency back-up generators. As discussed in Section IV.D.5.a.(4), *Toxic Air Contaminants*, the construction health risk assessment (HRA) performed for the 2021 Project was performed in accordance with the revised OEHHA Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments. As discussed in Response SCAQMD-16, the health risk assessment has been revised in this 2022 Final SEIR to include technical modifications. The results of the HARP2 analysis, as revised in this 2022 Final SEIR, would result in a maximum cancer risk of approximately 4.81 in one million, which is below the significance threshold of 10 in one million. As was concluded in the 2021 Draft SEIR, cancer risk impacts would be less than significant, and no new significant impacts are identified.

(22) Comment SCAQMD-22

Conclusion

Pursuant to California Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(b), South Coast AQMD staff requests that the Lead Agency provide South Coast AQMD staff with written responses to all comments contained herein prior to the certification of the Final SEIR. In addition, issues raised in the comments should be addressed in detail giving reasons why specific comments and suggestions are not accepted. There should be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information will not suffice (CEQA Guidelines Section 15088(c)). Conclusory statements do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful, informative, or useful to decision makers and to the public who are interested in the Proposed Project. Further, if the Lead Agency makes the findings that the recommended revisions to existing 2021 SEIR PDF-C1, 2021 SEIR PDF-O16, and MM G-7 are not feasible, the Lead Agency should describe the specific reasons supported by substantial evidence for rejecting them in the Final SEIR (CEQA Guidelines Section 15091).

(a) Response SCAQMD-22

This comment is a summary to the comment letter. Written responses, as required by CEQA Guidelines Section 15088(b), to all comments contained within this comment letter are provided in Responses SCAQMD-1 through SCAQMD-21, above. No further response to this comment is provided.

d. California Department of Fish and Wildlife (CDFW)

(1) Comment CDFW-1

The California Department of Fish and Wildlife (CDFW) has reviewed the Supplemental Environmental Impact Report (SEIR) from the City of Carson (City; Lead Agency) for The District at South Bay Specific Plan Amendment (Project). Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

CDFW's Role

CDFW is California's Trustee Agency for fish and wildlife resources and holds those resources in trust by statute for all the people of the State [Fish & G. Code, §§ 711.7, subdivision (a) & 1802; Pub. Resources Code, § 21070; California Environmental Quality Act (CEQA) Guidelines § 15386, subdivision (a)]. CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species (Id., § 1802). Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect State fish and wildlife resources.

CDFW is also submitting comments as a Responsible Agency under CEQA (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381). CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code, including lake and streambed alteration regulatory authority (Fish & G. Code, § 1600 et seq.). Likewise, to the extent implementation of the Project as proposed may result in "take", as defined by State law, of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.), or CESA-listed rare plant pursuant to the Native Plant Protection Act (NPPA; Fish & G. Code, § 1900 et seq.), CDFW recommends the Project proponent obtain appropriate authorization under the Fish and Game Code.

(a) Response CDFW-1

This comment identifies CDFW’s role and authority in the CEQA process and references how it may exercise its authority, particularly with reference to the Streambed Alteration Agreement process, or if project implementation may result in “take” of species protected under CESA.

With respect to CDFW’s authority under California Fish and Game Code Section 1600 et al., and as stated on 2021 Draft SEIR Appendix F1 p. 11, “[t]he Project Site does not contain any resources that would be regulated under the CWA or California Fish and Game Code Section 1600 et al., and there are no potential off-site impacts that could be regulated under the CWA or California Fish and Game Code Section 1600 et al.” Further, with respect to the “take” of species protected under CESA, no listed or candidate species of plants or wildlife proposed for listing by CDFW under the CESA were determined to have any potential to occur on the Project Site. Therefore, the 2021 Project would not result in a “take,” as defined by state law, of any species protected under CESA.

(2) Comment CDFW-2

Project Description and Summary

Objective: The Project includes the adoption and implementation of the District at South Bay Specific Plan Amendment (2021 Specific Plan Amendment). Under the 2021 Specific Plan Amendment, the Project would retain the wide range of land uses included in The District at South Bay Specific Plan that was approved by the City in 2018 (2018 Specific Plan). The Project does not propose any changes to the residential or regional commercial uses previously approved under the 2018 Specific Plan for 61 acres of the 157-acre site (i.e., Planning Areas 1 and 2). Instead, the Project proposes to replace the general commercial and hotel uses that were previously approved under the 2018 Specific Plan (within Planning Area 3) with light industrial uses, and separate commercial uses. This will be included with privately maintained, publicly accessible open space and community amenity areas. Specifically, in Planning Area 3, the Project will replace the previously approved general commercial uses under the 2018 Specific Plan with a maximum of 1,567,090 square feet (sf) of light industrial development and supportive office uses and the Carson Country Mart. The Carson Country Mart will consist of passive and active uses including a dog park, botanic garden, children’s play area, plaza areas, garden terrace, flexible event/social lawn, performance pavilion, beer garden, water feature, sculpture garden, bioretention garden, games terrace, and pedestrian and bicycle pathways.

Ultimately, the Carson Country Mart will include up to 10,000 sf of commercial/retail uses, 12,600 sf of restaurants (with drive-through capability), a 2,200 sf walk-up cafe adjacent to the dog park and event lawn, and 9,000 sf of food and beverage kiosks.

Location: The 157-acre site is generally located at 20400 South Main Street in the City of Carson, approximately 17 miles south of downtown Los Angeles and approximately 6.5 miles east of the Pacific Ocean. The Project site is located in the South Bay area of Los Angeles

County. It is located west of the San Diego Freeway (Interstate 405 [1-405] Freeway), south of Del Amo Boulevard, and north of the Avalon Boulevard interchange with the 1-405 Freeway.

(a) Response CDFW-2

This comment presents the commenter’s summary of the 2021 Project but does not raise significant environmental issues associated with construction or operation of the 2021 Project; therefore, the comment is acknowledged, and no further response is provided.

(3) Comment CDFW-3

Comments and Recommendations

CDFW offers the comments and recommendations below to assist the City in adequately identifying, avoiding, and/or mitigating the Project’s significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources. CDFW recommends the measures or revisions below be included in a science-based monitoring program that contains adaptive management strategies as part of the Project’s CEQA mitigation, monitoring, and reporting program (Pub. Resources Code, § 21081.6; CEQA Guidelines, § 15097).

(a) Response CDFW-3

This comment provides a general introduction to the comments raised in this letter. Responses to the comments contained in this letter are provided below in Responses CDFW-4 through CDFW-11.

With respect to the recommendation for a science-based monitoring program, there is one mitigation measure related to biological resources, which has been identified to further reduce an already less-than-significant impact related to nesting birds and to maintain compliance with the Migratory Bird Treaty Act (Mitigation Measure K-1). All mitigation measures, including Mitigation Measure K-1, would be subject to a Mitigation Monitoring and Reporting Program (MMRP), which is provided in Chapter II, *Mitigation Monitoring and Reporting Program*, of this 2022 Final SEIR. The MMRP identifies each mitigation measure identified in this 2022 Final SEIR; the timing of implementation; the implementing party; the entity responsible for enforcement; the monitoring agency; and the agency responsible for verification of compliance. Mitigation Measure K-1 is an adaptive mitigation/management strategy as it provides measures for when nesting bird surveys should occur and whether the surveys need to be repeated depending on when construction activities occur relative to the surveys (i.e., if over 7 days after the survey); measures that would be required if active nests are found during the surveys; and additional provisional measures if burrowing owls are present, recognizing that none of the previously conducted focused surveys, including six separate site visits, found burrowing owls.

(4) Comment CDFW-4

Specific Comments

Comment #1: Impacts to Wading Bird Habitat

Issue: The Project will remove water retention/detention basins on site that are often utilized by wading birds, ducks, and shorebirds.

Specific impacts: The SEIR states, “avian species are attracted to the surface water and wet soil conditions associated with the basins on site, including mallard (*Anas platyrhynchos*), ruddy duck (*Oxyura jamaicensis*), American avocet (*Recurvirostra americana*), and black necked stilt (*Himantopus mexicanus*).” There will be a loss of foraging habitat for a variety of avian species in the vicinity.

Why impacts would occur: The Project site will be entirely graded and redeveloped, and the multiple retention/detention basins on site will be completely removed. The variety of birds that currently utilize this site will no longer have the ability to forage. This will force individuals to the surrounding area, which lowers the carrying capacity of the surrounding habitat by putting more pressure on the resources available to the individuals currently occupying these areas.

Evidence impacts would be significant: The Project may have an adverse effect on avian species that utilize the site for foraging activities. In addition, the forced movement of individuals to surrounding areas lowers the carrying capacity of the surrounding habitat by putting more pressure on the resources available to the individuals currently occupying these areas. The Project will modify the habitat, resulting in a net loss of what is already little habitat available.

Recommended Potentially Feasible Mitigation Measure(s):

Mitigation Measure: Due to the loss of functional foraging habitat, CDFW recommends mitigating this loss at a 1:1 ratio on site. These on-site areas should provide foraging habitat for wading birds and include requisite elements for wading birds, such as snags, shade, native wetland vegetation, and other vegetation beneficial to birds and insects.

(a) Response CDFW-4

The 2021 Draft SEIR did not indicate that the basins on site are “often” utilized by birds. Rather the text specified on 2021 Draft SEIR p. IV.F-3 states that “as a result of ongoing remediation activities, the Project Site contains several artificial detention/retention basins and roadside drainage ditches. The largest of the basins occupy several acres in area. These features frequently hold water, but are periodically maintained in compliance with the National Pollutant Discharges Elimination System (NPDES) Construction General Permit and lack any permanent vegetation that provides biological resource value. Two of the three basins have a geomembrane liner, which prevents the establishment of any vegetation, and the third basin occasionally contains low-growing, non-native vegetation. A description of the remediation activities that have occurred on the 157-Acre Site is described in Section II.F, Remediation Activities, of this 2021 SEIR.”

The commenter assumes that these artificial, frequently maintained, and frequently dry basin areas on the site provide foraging habitat for avian species. The information presented in the 2021 Draft SEIR strongly suggests that these areas, while they may attract birds when they are wet, do not provide substantial or significant foraging value; further, as they are often dry, it would be more accurate to indicate that the basins may “occasionally” offer an attraction to birds flying over or through the area. The 2021 Draft SEIR p. IV.F-3 further describes the degraded, existing biological conditions of the Project Site, stating the following:

The 157-Acre Site is located in a highly urbanized area and has been subjected to intensive past land uses and recent disturbance. The Project Site was used as a landfill site between 1959 and 1965, prior to the incorporation of the City of Carson, for the deposition of waste/refuse from areas throughout Los Angeles County. Waste received at the landfill included organic wastes, such as solvents, oils, and sludges, as well as heavy metals, paint sludges, and inorganic salts. As a result of the deposition of these materials, hazardous substances detected in subsurface soil and groundwater on the 157-Acre Site consist of volatile organic compounds (VOCs), heavy metals, and petroleum hydrocarbons, and therefore, the 157-Acre Site is listed by the Department of Toxic Substances Control (DTSC) as a hazardous substances release site. Subsequent to use of the site as a landfill, there have been remediation activities and grading and contouring that occurred in approximately 2009 in preparation for the previously approved 2006 development proposal pursuant to the Remedial Action Plan (RAP), which resulted in large amounts of dirt and landfill cap materials that have been stockpiled on site. As a result, the Project Site is highly disturbed and does not exhibit any naturally occurring habitat or any areas dominated by native vegetation, or support special status biological resources. The Project Site presently contains bare ground, with a number of piles of crushed concrete debris, stockpiled landfill waste, several detention and retention ponds, a landfill gas collection and control system, and a groundwater extraction and treatment facility.

The removal of the limited foraging opportunities associated with the artificial detention/retention basins and roadside drainage ditches, as well as the conversion of the remainder of the Project Site to a developed condition, would not adversely affect foraging for “a variety of avian species” but would only affect a limited number of individual birds that do not reside on site but are moving through the area and, as a result, was not determined to be a significant impact under CEQA. Therefore, no mitigation is required.

The comment also offers an opinion that removal of these artificial basin areas would force “individuals to the surrounding area, which lowers the carrying capacity of the surrounding habitat by putting more pressure on the resources available to the individuals currently occupying these areas.” First, the area immediately surrounding the Project Site is densely populated urban development. Moving further away, within a 5-mile radius, there are two golf courses and one regional park (Lake Machado) where aquatic resources may offer foraging

opportunities to ducks, stilts, and other birds that require aquatic resources. However, there is no evidence that “the surrounding habitat” is at or near its carrying capacity. Encyclopedia Britannica defines carrying capacity as “the average population density or population size of a species below which its numbers tend to increase and above which its numbers tend to decrease because of shortages of resources. The carrying capacity is different for each species in a habitat because of that species’ particular food, shelter, and social requirements.” While it is true that reducing habitat in one area can lead to increased competition in adjacent areas, as stated above, the on-site basin areas do not support any resident populations since the basins are only wet for short time periods, have very low forage values, and are subject to regular maintenance. The individual birds that visit the basins on-site are just that, visitors. They stop briefly and then depart, and do not comprise resident populations. As a result, it is highly likely, if not certain, that the visiting birds in question already use the two previously mentioned golf courses and Lake Machado, as well as other available aquatic habitats in the region. Therefore, the loss of the on-site basins would not impact the carrying capacity of other “nearby” land uses that contain aquatic features. Lastly, it is even more speculative and unlikely that removal of the few artificial, regularly maintained and only occasionally wet basins from the site would impact any of these transient species’ regional populations.

(5) Comment CDFW-5

Additional Recommendations

Coyotes: The SEIR states, “During surveys conducted in both 2020 and 2021, a family group of coyotes (*Canis latrans*) were observed and at least one den was noted near the north end of the Project Site.” In order to prevent potential interaction during construction activities with coyotes known to be on site, CDFW recommends the following.

1. Outside of breeding and pupping season, sound or visual stimuli should be utilized to keep coyotes away from the den area.
2. Once it is confirmed that coyotes have left the den, it may be necessary for exclusionary fencing to be constructed that discourages coyotes from returning to the site during construction activities. Such a fence may have the following design characteristics.
 - a. Fence height should be a minimum of 5-1/2 feet and should be built higher on sloping terrain.
 - b. Net wire-mesh should be no larger than 6 inches between stays.
 - c. To deter digging under, bury a galvanized wire-mesh apron, attached securely to the bottom of the fence, 4 to 6 inches below the soil and extending outward at least 15 inches.
3. An extra degree of protection against coyotes scaling a fence can be obtained by installing a wire-mesh overhang of at least 18 inches, slanted outward, or roller-type devices designed

to be attached to the top of a fence, which prevent coyotes from getting a foothold in their attempts to climb or jump over (Timm 2007).

4. Maintain fencing on site until the den area is graded.

(a) Response CDFW-5

Coyotes are not a special-status species and have no legal protection; therefore, no “take” under the California Endangered Species Act could occur, and, as a result, no mitigation is required. Further, they are often considered a nuisance in urban areas where they frequently prey on domestic pets. The commenter’s recommendations regarding ways to prevent potential interactions with coyotes as a result of construction (i.e., impacts) are acknowledged, but are not required to be implemented pursuant to a significant impact disclosed in the 2021 Draft SEIR.

(6) Comment CDFW-6

Ephemeral Ditch: Figure IV F-1 Biological Observations on the Project Site indicates a lined ephemeral ditch on the southeast corner of the Project area. From the information provided by the SEIR and aerial photography, it is unclear where this ditch flows and if there is any potential connectivity at this time with the Carson Lateral. If there is connectivity, Project activities may be subject to notification pursuant to Fish and Game Code section 1600 et seq. CDFW recommends the SEIR clarify where this ephemeral ditch flows and whether there is any connectivity with other streams (i.e., the Carson Lateral).

(a) Response CDFW-6

The “lined ephemeral ditch” is a lined depression or catchment. The subject ditch or depression occasionally holds rainwater runoff from the adjacent higher landform until it evaporates, but does not connect to the Torrance lateral or any other stream.

(7) Comment CDFW-7

Nesting Birds. CDFW recommends avoiding any construction activity during nesting season. If not feasible, CDFW recommends modifying Mitigation Measure K-1 by including the underlined language and excluding the ~~strikethrough~~ as follows:

Impacts to nesting birds would be avoided by conducting all construction activities outside of the bird nesting season (i.e., from September 4 15 to February 14 for most birds, from July 1 to January 14 1 for raptors). However, if construction activities must occur during the nesting season, the following measures shall apply:

A. Prior to work during the bird nesting season (February 15 to ~~August 31~~ September 15 for most birds, January 15 1 to June 31 for raptors), a qualified biologist shall conduct a pre-construction survey of all suitable habitat for the presence of nesting birds no more than 7 days prior to construction activities, including any ground-disturbing activities (e.g., staging, mobilization, grading), as well as prior to any vegetation removal within the Project site. The

results of the pre-construction survey shall be valid for 7 days; if vegetation removal activities do not commence within 7 days following the survey or if activities cease for more than 7 consecutive days, a new pre-construction nesting bird survey shall be conducted before construction resumes.

It should be noted that the temporary halt of project activities within nesting buffers during nesting season does not constitute effective mitigation for the purposes of offsetting Project impacts associated with habitat loss. Additional mitigation would be necessary to compensate for the removal of nesting habitat within the project site based on acreage of impact and vegetation composition. Mitigation ratios should increase with the occurrence of an SSC and should further increase with the occurrence of a CESA-listed species.

(a) Response CDFW-7

It is expected that birds, if they occur on-site prior to construction activities, would be finished nesting by mid-July or early August, at the latest. Further, it is also expected that there is no particularly suitable nesting habitat on site for large birds of prey (e.g., raptors) to nest. The 2021 Draft SEIR concludes that there would be a less-than-significant impact to nesting birds. Accordingly, Mitigation Measure K-1 is conservatively imposed by the lead agency out of an abundance of caution to both to maintain compliance with Fish and Game Code Section 3503 and the federal Migratory Bird Treaty Act and reduce the severity of an already less-than-significant impact to nesting birds. However, as requested by CDFW, Mitigation Measure K-1 has been revised as follows:

Mitigation Measure K-1. Impacts to nesting birds would be avoided in PA3 by conducting all construction activities outside of the bird nesting season (i.e., from September 15 to February 14 for most birds, from July 1 to January 1 for raptors). However, if construction activities must occur during the nesting season, the following measures shall apply:

- A. Prior to work during the bird nesting season (February 15 to August 31 September 15 for most birds, January 1 to June 30 for raptors), a qualified biologist shall conduct a pre-construction survey of all suitable habitat for the presence of nesting birds no more than 7 days prior to construction activities, including any ground-disturbing activities (e.g., staging, mobilization, grading), as well as prior to any vegetation removal within the Project Site. The results of the pre-construction survey shall be valid for 7 days; if vegetation removal activities do not commence within 7 days following the survey or if activities cease for more than 7 consecutive days, a new pre-construction nesting bird survey shall be conducted before construction resumes.
- B. If any active nests are found during a pre-construction nesting bird survey, a buffer of up to 300 feet for most bird species and 500 feet for raptors, or as determined appropriate by the qualified biologist (based on species-specific tolerances and site-specific conditions), shall be delineated, flagged, and

avoided until the nesting cycle is complete (i.e., the qualified biologist determines that the young have fledged or the nest has failed). The qualified biologist may also recommend other measures to minimize disturbances to active nests that may include but are not limited to limiting the duration of certain activities, placing sound barriers (e.g., noise blankets), or visual barriers (e.g., straw bales), and/or providing full-time monitoring by a qualified biologist.

- C. As a provisional additional mitigation element, in case surveys identify burrowing owl as present on site, such occurrence shall be documented and CDFW shall be notified. Although it is considered highly unlikely that a pair of burrowing owls might attempt to nest on the site (due to disturbance, limited food resources, and presence of coyotes), if an active burrowing owl nest is encountered, a minimum buffer of 500 feet shall be delineated, flagged, and avoided by construction activity until the nesting cycle is complete (i.e., the qualified biologist determines that the young have fledged or the nest has failed). A qualified biologist may recommend other measures as noted in Item B, above. However, CDFW will be consulted prior to any reduction of avoidance buffers or implementation of other measures, such as passive relocation.

Mitigation Measure K-1 is a new mitigation measure identified in the 2021 Draft SEIR and, as such, is shown in the 2021 Draft SEIR as underlined text; in order to show the additional revisions to Mitigation Measure K-1 suggested by CDFW, new text proposed in the 2022 Final SEIR is provided as double-underlined text and deleted text is shown in double-strikeout.

(8) Comment CDFW-8

Rodenticides. CDFW recommends the SEIR prevent the use of second-generation anticoagulant rodenticides on all future housing development associated with the Project.

(a) Response CDFW-8

In September 2020, Governor Gavin Newsom signed into law Assembly Bill 1788, which prohibits almost all uses of second-generation anticoagulant rodenticides (SGARs) statewide. Rodenticide products containing brodifacoum, bromadiolone, difenacoum, or difethialone have been restricted materials in California since 2014. They are only available for use by licensed pest control applicators in California, and no such materials are proposed as part of the 2021 Project. Further, as a state law, compliance with AB 1788 is assumed as a matter of regulatory compliance, and no mitigation is required.

(9) Comment CDFW-9

Data. CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database [i.e., California Natural Diversity Database

(CNDDDB)] which may be used to make subsequent or supplemental environmental determinations [Pub. Resources Code, § 21003, subd. (e)]. Accordingly, CDFW recommends that the subsequent CEQA documents include measures where lead agencies of individual projects report any special status species detected during preparation of project-level environmental impact analyses/environmental documents. Special status species information should be submitted to the CNDDDB by completing the Online Field Survey Form (CDFW 2021). The lead agency should ensure all pertinent data has been properly submitted, with all applicable data fields filled out, prior to finalizing/adopting an environmental document.

(a) Response CDFW-9

No special status species were detected during surveys for the 2021 Project, except wide-ranging raptors briefly flying overhead. In general, only nesting observations of special status raptor species are reported to the CNDDDB. Therefore, the comment is acknowledged, and no further action is required. In addition, for clarification, the District at South Bay Specific Plan Amendment SEIR is a project-level document.

(10) Comment CDFW-10

Mitigation and Monitoring Reporting Plan. CDFW recommends the City update the Project's environmental document to include mitigation measures recommended in this letter. CDFW provides comments to assist project proponents in developing mitigation measures that are specific, detailed (i.e., responsible party, timing, specific actions, location), and clear in order for a measure to be fully enforceable and implemented successfully via a mitigation monitoring and/or reporting program (CEQA Guidelines, § 15097; Pub. Resources Code, § 21081.6). The City is welcome to coordinate with CDFW to further review and refine the Project's mitigation measures. Per Public Resources Code section 21081.6(a)(1), CDFW has provided the City with a summary of our suggested mitigation measures and recommendations in the form of an attached Draft Mitigation and Monitoring Reporting Plan (MMRP; Attachment A).

(a) Response CDFW-10

Attachment A reiterates the comments made in the body of the CDFW comment letter; therefore, this response refers back to previously provided responses. Refer to Response CDFW-4 for a discussion of the recommended mitigation measure related to wading birds. Refer to Response CDFW-5 for a discussion of the recommended mitigation measure related to coyotes. Refer to Response CDFW-6 for a discussion of the ephemeral ditch. Refer to Response CDFW-7 for a discussion of the recommended mitigation measure related to nesting birds. Refer to Response CDFW-8 for a discussion of rodenticides. Refer to Response CDFW-9 for a discussion of reporting information to the CNDDDB. In addition, as stated in Response CDFW-3, all mitigation measures, including Mitigation Measure K-1, would be subject to an MMRP, which is provided in Chapter II, *Mitigation Monitoring and Reporting Program*, of this 2022 Final SEIR. The MMRP identifies each mitigation measure identified in this 2022 Final SEIR; the timing of

implementation; the implementing party; the entity responsible for enforcement; the monitoring agency; and the agency responsible for verification of compliance.

(11) Comment CDFW-11

Filing Fees

The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of filing fees is necessary. Fees are payable upon filing of the Notice of Determination and serve to help defray the cost of environmental review by CDFW. Payment of the fee is required for the underlying Project approval to be operative, vested, and final (Cal. Code Regs., tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089).

(a) Response CDFW-11

The 2022 CDFW filing fee for an EIR will be paid when, and if, a Notice of Determination is filed with the Los Angeles County Clerk. The filing fee is not required if a project has an impact on fish and/or wildlife; instead, the Legislature authorized CDFW to impose and collect an environmental document filing fee to defray the costs of managing and protecting California's fish and wildlife resources, which includes consulting with public agencies, reviewing environmental documents, recommending mitigation measures, and developing monitoring requirements (Fish & Game Code Section 711.4(a)).

(12) Comment CDFW-12

Conclusion

We appreciate the opportunity to comment on the Project to assist the City of Carson in adequately analyzing and minimizing/mitigating impacts to biological resources. CDFW request an opportunity to review and comment on any response that the City has to our comments and to receive notification of any forthcoming hearing date(s) for the Project [CEQA Guidelines, § 15073(e)]. If you have any questions or comments regarding this letter, please contact Felicia Silva, Environmental Scientist, at (562) 292-8105 or by email at Felicia.Silva@wildlife.ca.gov.

(a) Response CDFW-12

As required by CEQA Guidelines Section 15088(b), the City of Carson will provide a written response, either in written or electronic format, to a public agency (in this case, CDFW) on comments made by CDFW at least 10 days prior to the certification hearing for the District at South Bay Specific Plan Amended SEIR. In addition, the City of Carson will provide notification of any future hearing date(s) relative to 2022 EIR on the City's website. Also, the CEQA Guideline section cited in the comment refers to the public review requirements for a negative declaration or mitigated negative declaration.

(13) Comment CDFW-13**References:**

[CDFW] California Department of Fish and Wildlife. 2021. Submitting Data to the CNDDDB. Available from: <https://wildlife.ca.gov/Data/CNDDDB/Submitting-Data>

[CDFW] California Department of Fish and Wildlife. 2020. Natural Communities. Accessed at: <https://wildlife.ca.gov/Data/VegCAMP/Natural-Communities#sensitive%20natural%20communities>

R. M. Timm, UC Research & Extension Center, Hopland; C. C. Coolahan, USDA-APHIS Wildlife Services, Sacramento, CA.; R. O. Baker, emeritus, CA State Polytechnic Univ.-Pomona; and S. F. Beckerman, USDA-APHIS Wildlife Services, Springfield, IL. Produced by 1PM Education and Publications, University of California Statewide 1PM Program. 2007. Accessed at: <http://ipm.ucanr.edu/PMG/PESTNOTES/pn74135.html>

(a) Response CDFW-13

The provision of references is acknowledged, and no response is required.

IV.B.2 Native American Tribal Government**a. Gabrieleno Band of Mission Indians–Kizh Nation (Gabrieleno)****(1) Comment Gabrieleno-1**

Thank you for your letter regarding the project above. This is to concur that we are in agreement with the Specific Plan Amendment. However, our Tribal government would like to request consultation for any and all future projects when ground disturbance will be occurring within this location.

(a) Response Gabrieleno-1

The 2021 Draft SEIR addressed tribal cultural resources in Chapter VI, *Effects Found Not to Be Significant*, starting on p. VI-59. In summary, no identified tribal cultural resources as defined in PRC Section 21074(a)(1) that are listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k) have been identified within the Project Site. Further, consultation was initiated and concluded in 2017 and 2020 between the City and the Kizh Nation. In 2017, at the conclusion of consultation, the tribe asked to be contacted if anything should change regarding excavation into native soils. In 2020, at the conclusion of consultation, the tribe stated that no further consultation would be required provided that development activities did not require excavation beyond what was previously proposed. Should future implementation of the 2021 Project be subject to additional CEQA review (e.g., if excavation activities are substantially

different than assumed in 2017 and 2020), the future project(s) would also be subject to the consultation requirements of Assembly Bill (AB) 52 and, in that case, the City will inform the Kizh Nation of the proposed future project(s).

IV.B.3 Private Entities

a. CAM-Carson LLC (CAM-Carson)

(1) Comment CAM-Carson-1

We submit this letter on behalf of our client CAM-Carson LLC. As the City is aware, CAM-Carson LLC entered into certain agreements related to the development of Planning Area 2 of the Districts at South Bay in 2018, and CAM-Carson filed litigation against the Carson Reclamation Authority (CRA) and the City related to such agreements.

The Draft Supplemental Impact Report (SEIR) released in October 2021 states that remediation was halted due to disputes between CAM-Carson and the CRA regarding CAM-Carson's failure to reimburse for certain expenses. (SEIR, Project Description, page II-15.) That is a mischaracterization of the dispute and does not accurately reflect the facts and issues as detailed in CAM-Carson's operative complaint and reflected in documentary evidence. Among other issues, as noted elsewhere in the SEIR, the CRA did not, and still does not, have sufficient funds to complete the remediation that was required to be completed prior to CAM-Carson undertaking its construction under the relevant agreements. The mischaracterization of the dispute with CAM-Carson should be deleted from, or corrected in, the SEIR.

Given the limited time available, CAM-Carson has not fully assessed the proposed amendments to the Specific Plan and related environmental review and reserves its right to comment further at a later date.

(a) Response CAM-Carson-1

The commenter indicated that the Draft EIR mischaracterized the circumstances under which remediation was halted at the Project Site. This comment does not raise a significant environmental issue; however, as requested, the text on 2021 Draft SEIR p. II-15, first paragraph, has been revised as follows:

Remediation of the Cal Compact Landfill commenced in 2009 by CM LLC through its contractor, Tetra Tech Inc., which involved the installation of various features associated with the GETS, the LGCCS, and construction of a slab for the future LOC. Following the transfer of the 157-Acre Site from CM LLC to the CRA in 2015, significant additional remediation work began on Cell 2 (PA2) in October 2018, but was halted in October 2019 ~~due to disagreements between the CRA and CAM regarding CAM's failure to reimburse the CRA for expenses it incurred with respect to pre-development activities on PA2 on CAM's behalf for various reasons outside of the sole control of the City.~~ Once remediation re-commences, the installation of the remedial systems necessary to serve

Cell 2 are expected to be completed within 6 months. Aside from the already-installed remedial improvements on Cells 3 and 5, no remediation activities have occurred in Cell 1 (PA1) or Cells 3, 4, and 5 (PA3). In connection with the remedial activities currently being performed on the 157-Acre Site and ongoing operations and maintenance of the 157-Acre Site, the 157-Acre Site currently includes groundwater and landfill gas treatment facilities that serve the entire 157-Acre Site as well as construction trailers and equipment located on Cell 1, subsurface utilities located on Cell 2, and soil, refuse, and material stockpiles and construction materials stored in various locations on the 157-Acre Site.

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