

Addendum to the
Final Removal Action (Cleanup) Plan - Offsite Properties within the
Exide Preliminary Investigation Area
Final Environmental Impact Report
(State Clearinghouse No. 2016061032)

for
Parkways Cleanup Goal 80 mg/kg

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SECTION 1

Introduction

1.1 Overview

The former Exide Technologies, Inc. battery recycling facility (Exide Facility) is located at 2700 South Indiana Street, in the City of Vernon, California. The property has been used for a variety of metal fabrication and metal recovery operations since the 1920s. Exide acquired the property in 2000 and operated a battery recycling facility until 2014. A number of state and local environmental agencies regulated Exide's operations, including the Department of Toxic Substances Control (DTSC), the South Coast Air Quality Management District (SCAQMD), and the Los Angeles County Certified Unified Program Agency.

In 2013, DTSC ordered Exide to sample 39 residential properties in the northern and southern initial assessment areas (three [3] blocks each in East Los Angeles and Maywood, respectively). These areas are collectively referred to as the Initial Assessment Area. The Initial Assessment Area is the residential area where an air dispersion modeling study and health risk assessment, conducted by Exide for the SCAQMD, indicated that metal and other contaminants emitted by Exide's former operations were most likely to have deposited and created the greatest potential for harm. Sampling showed high levels of lead in soils at residential properties, leading DTSC to order Exide to sample and cleanup all 219 properties in the Initial Assessment Area.

DTSC's preliminary evaluation of subsequent soil sampling indicated that lead emissions from the former Exide Facility likely extend to a distance between 1.3 and 1.7 miles from the Exide Facility, with distances varying depending on wind direction. This area is referred to as the Preliminary Investigation Area or PIA. Based on information from the Los Angeles County Assessor's Office, the PIA is estimated to include about 10,000 residences and other sensitive land use properties, such as schools, daycares and parks. The PIA encompasses properties within the cities of Bell, Commerce, Huntington Park, Maywood, Los Angeles (Boyle Heights neighborhood), Vernon and the County of Los Angeles (East Los Angeles neighborhood).

DTSC estimated a cleanup rate of 25 to 70 properties in any one (1) week, and analyzed an average cleanup rate of 50 properties per week. DTSC took this approach for two reasons: 1) to provide a thorough and health protective analysis of the impacts of implementing the project; and 2) to allow DTSC to use the analysis in this document to support potential future cleanups if and when additional funding is authorized, which will allow such work to proceed more quickly. Cleanup is anticipated to be ongoing through 2025 with existing funding, where cleanup is occurring at a rate of approximately 80 homes per month.¹

In 2016, an Environmental Impact Report (EIR) was prepared for the Final Removal Action Plan (Cleanup Plan) Offsite Properties within the Exide PIA Project (project). The Final EIR (hereafter referred to as the Exide Cleanup Plan EIR) was approved and certified in July 2017.

1.2 Purpose of the Addendum

According to Section 15164 of the State California Environmental Quality Act (CEQA) Guidelines, an addendum to a previously certified environmental impact report (EIR) or adopted negative declaration shall be prepared by a lead or responsible agency if changes or additions to the document are necessary but none of the conditions described in Section 15162 requiring the preparation of a subsequent EIR or negative

¹ Per DTSC's Exide Residential Cleanup webpage accessed on February 5, 2024, the latest cleanup progress reported during preparation of the Draft Addendum was 4,980 properties at a rate of about 80 homes a month. Source: DTSC. 2025. Exide Residential Cleanup Webpage. Available at: <https://dtsc.ca.gov/residential-cleanup/> (accessed February 5, 2024).

declaration are applicable. An addendum need not be circulated for public review but can be included in or attached to the final EIR or adopted negative declaration. The decision-making body considers the addendum with the final EIR or adopted negative declaration prior to making a decision on the project, as modified.

Section 15162 of the State CEQA Guidelines states that, for a project covered by a certified EIR or adopted negative declaration, preparation of a subsequent EIR or negative declaration is required if one or more of the following conditions occur:

1. Substantial changes are proposed in the project that will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.
2. Substantial changes occur with respect to the circumstances under which the project is undertaken that will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.
3. New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the negative declaration was adopted, shows any of the following:
 - a. The project will have one or more significant effects not discussed in the previous EIR or negative declaration;
 - b. Significant effects previously examined will be substantially more severe than shown in the previous EIR;
 - c. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
 - d. Mitigation measures or alternatives that are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

This Addendum will show that some changes or additions to the project analyzed in the Exide Cleanup Plan EIR are necessary but none of the conditions requiring the preparation of a subsequent negative declaration are applicable.

1.3 Scope and Content of the Addendum

This Addendum uses an Environmental Checklist Form from Appendix G of the State CEQA Guidelines to compare the anticipated environmental effects of the proposed modification to the project with those disclosed in the Exide Cleanup Plan EIR and reviews whether any of the conditions requiring preparation of a subsequent EIR pursuant to Section 15162 of the CEQA Guidelines are met and whether there are new significant impacts resulting from the proposed modification to the project. The Environmental Checklist Form is used to review the potential environmental effects of the proposed modification to the project for each of the following areas:

- Aesthetics;
- Agriculture and Forestry Resources;
- Air Quality;
- Biological Resources;
- Cultural Resources;
- Energy;

- Geology and Soils;
- Greenhouse Gas Emissions;
- Hazards and Hazardous Materials;
- Hydrology and Water Quality;
- Land Use and Planning;
- Mineral Resources;
- Noise;
- Population and Housing;
- Public Services;
- Recreation;
- Transportation;
- Tribal Cultural Resources;
- Utilities and Service Systems; and
- Wildfire.

Section 3 of this Addendum includes the environmental review of the proposed modification to the project for these environmental topic areas, including a determination as to whether the proposed modification would result in an increase in the severity of the impacts identified in the Exide Cleanup Plan EIR, or any new impacts not previously considered in the Exide Cleanup Plan EIR.

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SECTION 2

Project Background and Proposed Modification

2.1 Project Background

As discussed above, an EIR was prepared for the project in 2016 and approved in 2017. The PIA analyzed in the Exide Cleanup Plan EIR is defined as an irregularly-shaped area encompassing an approximately 1.7-mile radius around the former Exide Facility located in Vernon, California. The PIA includes properties with sensitive land uses—residential properties, schools, day care centers, child care facilities, and parks—where lead released into the air from the former Exide Facility may have been deposited onto surface soil. The Cleanup Plan and EIR addressed lead-impacted soil at sensitive land use properties within the PIA. The underlying purpose of the Cleanup Plan is to select a method for cleaning up sensitive land use properties within the PIA with the highest lead concentrations in the soil and greatest potential for exposure. With the currently available funding at the time the EIR was prepared, DTSC anticipated that it would be able to cleanup approximately 2,500 sensitive land use properties within the PIA with the highest levels of lead and greatest potential exposure to sensitive individuals (i.e., children under seven (7) years of age and pregnant women) within two years of cleanup activities commencing. The EIR, however, evaluated cleaning up as many as 3,500 properties in the first year and 10,000 properties over four (4) years. DTSC estimated a cleanup rate of 25 to 70 properties in any one (1) week, and analyzed an average cleanup rate of 50 properties per week. DTSC took this approach for two reasons: 1) to provide a thorough and health protective analysis of the impacts of implementing the project; and 2) to allow DTSC to use the analysis in this document to support potential future cleanups if and when additional funding is authorized, which will allow such work to proceed more quickly.

In the time since the EIR was approved, a total of 4,980 properties have been cleaned up and cleanup is anticipated to be ongoing through 2025 with existing funding, where cleanup is occurring at a rate of approximately 80 homes per month.² However, it has been determined that cleanup of additional areas within the PIA (specifically, parkways), which were not covered in the EIR, may be required. For purposes of this Addendum, a parkway is generally defined as unpaved areas on average approximately 5 feet wide and 5 to 40 feet long located in front of sensitive land use parcels between the sidewalk and the street (within the public right of way). In some cases, parkways are located immediately abutting the parcel followed by the sidewalk and then street.

2.2 Proposed Modification to the Project

The proposed modification to the project evaluated in this Addendum includes the excavation and disposal procedures for soil containing lead, arsenic, antimony, cadmium, copper, and/or zinc in exceedance of their respective screening criteria (referred to as the “Parkways Cleanup Goal 80 mg/kg”) as documented in the *Final Revised Human Health Risk Assessment: Parkway in the Vicinity of the Exide Technologies Battery Recycling Facility* (herein referred to as the HHRA) and shown below in Table 1.

This modification to the project includes proposed cleanup of approximately 7,806 of a total of 10,374 parkways (6,426 of a total of 8,524 decision units) within the PIA based on the results of the HHRA, and shown below in Table 2. A parkway refers to an unpaved area, which generally lies between the sidewalk and the street in front of residential properties, schools, parks, daycare centers, and other sensitive land use parcels. Parkway vary in length, width, location relative to street and residence, and vary by many other

² Per DTSC’s Exide Residential Cleanup webpage accessed on February 5, 2024, the latest cleanup progress reported during preparation of the Addendum was 4,980 properties at a rate of about 80 homes a month. Source: DTSC. 2024. Exide Residential Cleanup Webpage. Available at: <https://dtsc.ca.gov/residential-cleanup/> (accessed February 5, 2024).

features. For the purposes of this Addendum (to determine which parkways require cleanup), parkway decision units were established. Parkway decision units refer to the parkway or portion of a parkway for which a sample was collected to characterize the nature and extent of metals-impacted soil. Generally, sample locations were centered in the front of a parcel laterally. In some instances, multiple smaller parkways are present adjacent to target parkways (generally divided by driveways, walkways, or other obstructions). In these cases, one sample was collected to represent the several smaller parkways. In other instances, parkways may extend laterally for a longer distance without division from driveways, walkways, or other obstructions (such as parkways at schools and parks). In these instances, multiple sample locations spaced approximately 50 to 100 feet apart were selected to divide these into individual decision units. While parkways are adjacent to parcels, some parkways may be adjacent to a single parcel, multiple parkways may be adjacent to the same parcel, or a parkway may span across multiple adjacent parcels. The *Master Excavation, Disposal, and Restoration Design Plan: Offsite Properties within the Exide Preliminary Investigation Area* (herein referred to as the *Master Excavation Plan*) documents cleanup procedures for excavation, transportation, and disposal of lead- and metals-impacted soil, and describes procedures for backfill, compaction, and restoration of the parkways with clean soil and replacement landscaping as applicable.

Table 1: Summary of Screening Criteria Used for Parkway Cleanup Goal 80 mg/kg

Criteria	Chemicals of Concern (mg/kg)					
	Lead ¹	Arsenic ²	Antimony ³	Cadmium ³	Copper ³	Zinc ³
Parkways Cleanup Goal 80 mg/kg RESIDENTIAL SCREENING CRITERIA	80	12	31	7.1	3,100	23,000

Notes:

¹ – Lead based upon target blood lead level of 1 micrograms per deciliter (µg/dl).

² – Based upon Southern California-specific upper-bound ambient level of arsenic of 12 milligram per kilogram (mg/kg).

³ – Based upon the noncancer endpoint, because the cancer endpoint was either a higher concentration or no cancer endpoint exists.

Table 2: Summary of Metal Exceedances for Parkway Cleanup Goal 80 mg/kg

Category	Parkways 80 mg/kg Cleanup Goal	
	Parkways	Parkway Decision Units
Approximate Total Number of Parkway	10,374 (9,991 sampled)	8,524 (8,124 sampled)
Approximate Total Number of Parkway with Exceedances by One or More Metals ¹	7,806	6,426
Approximate Total Number of Parkway with Exceedances due to Lead	7,757	6,389
Approximate Total Number of Parkway with Exceedances due to Arsenic	309	243
Approximate Total Number of Parkway with Exceedances due to Other Metals (Antimony, Cadmium, Copper, or Zinc)	8	7
Estimated Total Volume of Impacted Soil ^{2,3} (bcy)	36,691	36,691

Table 2: Summary of Metal Exceedances for Parkways Cleanup Goal 80 mg/kg

Category	Parkways 80 mg/kg Cleanup Goal	
	Parkways	Parkway Decision Units

Notes:

¹ – Note that the total number of parkways with exceedances reflects exceedances by one or more metals. Thus, the parkways with exceedances solely for lead (6,389), arsenic (243), and other metals (7) shown in subsequent three rows of this table are not additive.

² – A bank cubic yard, or BCY, is the calculation or measurement of 1 cubic yard of earth or rock in its natural state before it is removed from the ground.

³ – The estimated total volume of impacted soil are preliminary estimates and do not account for slope-back, limited soil excavation around “protect in place” features.

Cleanup activities are documented in greater detail in the *Master Excavation Plan*, and would generally consist of the following steps:

- Representative confirmation soil samples will be collected at parkways prior to excavation, where necessary, in accordance with the *Master Excavation Plan*. The maximum excavation depth at any parkway will be 18 inches below ground surface (bgs). The confirmation soil samples will be used to evaluate the parkways target cleanup goals (TCGs) in soil deeper than the proposed excavation depth for that parkway.
- Representative waste profile soil samples will be collected at parkways prior to excavation, in accordance with the *Master Excavation Plan*. One soil boring will be advanced from ground surface to the proposed excavation depth and composited with adjacent parkways, as appropriate. The results of the composite waste profile sample will be used to prepare the waste profile for acceptance at a disposal facility.
- Each impacted parkway would be excavated to the proposed excavation depth and extent identified per the TCGs and in accordance with the *Master Excavation Plan*. If the target excavation depths cannot be achieved due to obstructions such as tree roots or utilities, a post-excavation confirmation sample will be collected at the depth of excavation achieved. If possible, excavated soil would be temporarily contained in movable storage vessels and/or directly loaded into bins or dump trucks. The soil would then be transported off-site for disposal.
- The excavated area would be backfilled to the pre-existing grades, except as necessary to permit adequate draining before it is restored with landscaping at each property. For excavations that are 12 inches or deeper, structural soil fill material would be used to achieve backfill grades to within 6 inches of final grade. Fill material would contain enough organic and mineral content to support planting. Structural fill, unlike a pure sand fill material, contains enough fines to prevent accelerated drainage of water, and as such it is a satisfactory support for topsoil. A minimum of 6 inches of topsoil will be placed as final grade in each excavation. For 6-inch excavations, only topsoil would be used to backfill the entire 6-inch depth.

DTSC estimates an average cleanup rate of 20 parkways per week. Table 3 below shows the number of parkway cleanup locations and proposed schedule by jurisdiction.

Table 3: Total Parkway Cleanup Locations and Proposed Schedule by Jurisdiction

Task/Jurisdiction	Parkways 80 mg/kg Cleanup Goal	
	Number of Parkways Decision Units that Require Cleanup	Total Estimated Time (weeks) ¹
Project Mobilization	N/A	8
City of Bell	272	14
City of Commerce	724	36
City of Huntington Park	696	35
City of Los Angeles	1,693	85
City of Maywood	1,748	87
Unincorporated (County of Los Angeles)	1,293	65
City Vernon	0	0
Project Demobilization & Closeout	N/A	8
Total	6,426	338 weeks

Notes:

¹ – Assumes contractor can complete 20 parkways per week.

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SECTION 3

Environmental Review

3.1 Introduction

As discussed previously, the Exide Cleanup Plan EIR was certified in July 2017. No substantial changes in circumstances have occurred since the Exide Cleanup Plan EIR was prepared and no new information of substantial importance has become available since the Exide Cleanup Plan EIR was prepared.

The discussion below compares the anticipated environmental effects of the proposed modification to the project with those disclosed in the Exide Cleanup Plan EIR, per Appendix G of the State CEQA Guidelines, and provides a determination as to whether the proposed modification to the project would result in an increase in the severity of the impacts identified in the Exide Cleanup Plan EIR, or any new impacts not previously considered in the Exide Cleanup Plan EIR.

3.2 ENVIRONMENTAL ANALYSIS

3.2.1 AESTHETICS

The Exide Cleanup Plan EIR indicated that the project would result in less than significant impacts related to aesthetics. There are no scenic vistas, scenic resources, or state scenic highways within or adjacent to the PIA. While the project would temporarily change the visual character of affected properties during the cleanup due to removal of some landscaping and topsoil, equipment storage, and temporary security fencing, because of the short-term and temporary nature of the cleanup and the replacement of landscaping, the project would not substantially degrade the visual character of the properties and their surroundings. Also, equipment used for the project would not be characterized by large reflective surfaces that would cause glare from reflected sunlight that would adversely affect views in the area. The project would also not require the construction of any structures that could result in glare from reflected sunlight or require nighttime lighting as project construction would occur during the day.

The proposed modification to the project (i.e., parkway cleanup activities including contaminated soil excavation, haul, and backfilling) would occur within the PIA and would utilize small excavating and construction equipment, as well as hand tools at ground level. Similar to the project, no structures would be installed and no tall construction equipment such as cranes would be used. In addition, similar to the project, the proposed parkway cleanup activities would be short-term, include replacement landscaping, would occur during the day, and would not create new sources of light and glare. Given this, the proposed modification to the project would not result in new impacts or a substantial increase in the severity of impacts identified in the Exide Cleanup Plan EIR related to aesthetics.

Conclusion: *The proposed modification to the project would not result in new impacts or a substantial increase in the severity of impacts identified in the Exide Cleanup Plan EIR related to aesthetics.*

3.2.2 AGRICULTURE AND FORESTRY RESOURCES

The Exide Cleanup Plan EIR indicated that the project would result in no impact related to agriculture and forestry resources as there are no existing agriculture or forestry resources nor any existing agriculture and forestry zoned lands within the PIA. The proposed modification to the project would be located within the PIA. Given this, the proposed modification to the project would result in no impact to agriculture and forestry resources.

Conclusion: *The proposed modification to the project would result in no impact to agriculture and forestry resources.*

3.2.3 AIR QUALITY

The Exide Cleanup Plan EIR indicated that impacts related to air quality, specifically regional emissions of nitrogen oxides (NO_x), were found to be significant and unavoidable. The Exide Cleanup Plan EIR determined that other criteria pollutant emissions, including volatile organic compounds (VOC), carbon monoxide (CO), sulfur dioxide (SO₂), particulate matter less than 10 micrometers in diameter (PM₁₀) and particulate matter less than 2.5 micrometers in diameter (PM_{2.5}) would not exceed the regional or localized thresholds of significance. The localized emissions of NO_x would also not exceed the SCAQMD localized thresholds of significance.

The proposed modification to the project would involve parkway cleanup activities (i.e., clearing/grubbing, soil excavation, soil import, and landscaping) that would use on-road vehicles and off-road equipment (e.g., worker commute vehicles, haul trucks, skid steer loaders, excavators, forklifts, rubber tired loaders, and tractors/loaders/backhoes) for the removal of contaminated soil similar in nature to that analyzed in the Exide Cleanup Plan EIR. On-road and off-road equipment vehicle exhaust would generate criteria air pollutant emissions of VOC, NO_x, CO, SO₂, PM₁₀, and PM_{2.5}. In addition, soil excavation, soil import, and restoration activities would generate fugitive dust emissions of PM₁₀, PM_{2.5}, and lead from the contaminated soil.

The proposed modification to the project would require additional cleanup activities from those analyzed in the Exide Cleanup Plan EIR. Consistent with the Exide Cleanup Plan EIR, the proposed modification to the project would implement project design features (PDFs) that would reduce emissions from on-road vehicles and construction equipment, as well as control the possible generation and migration of dust during the excavation and handling of soil. Table 4 below summarizes the project’s maximum daily emissions as reported in the Exide Cleanup Plan EIR as well as the maximum daily emissions from the proposed modification to the project.

Table 4: Project and Proposed Modification Maximum Daily Emissions (pounds per day)

Activity/Description	VOC	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}	Lead
Project Maximum Daily Emissions ¹	26	210	324	1	88	20	<1
Proposed Modification Maximum Daily Emissions ²	0.88	15.80	26.94	0.08	2.42	0.64	<1
SCAQMD Threshold	75	100	550	150	150	55	3

Notes: VOC = volatile organic compounds; NO_x = nitrogen oxides; CO = carbon monoxide; SO₂ = sulfur dioxide; PM₁₀ = particulate matter less than 10 micrometers in diameter; PM_{2.5} = particulate matter less than 2.5 micrometers in diameter
¹ Based on Exide Cleanup Plan EIR (ESA 2017).

² Proposed modification to the project’s maximum daily emission estimates assume a worst-case scenario that cleanup activities for four parkways requiring the most excavation would occur simultaneously.

As shown in Table 4, the maximum daily emissions associated with the proposed modification to the project would not result in any additional significant adverse air quality impacts. The project’s emissions would continue to exceed the NO_x regional threshold of significance; however, with implementation of PDF AQ-1 (use of Tier 4 compliant off-road equipment), PDF AQ-2 (use of model year 2010 and newer haul trucks), and PDF AQ-3 (idling limits), the proposed modification would not result in a substantial increase in the severity of the impacts identified in the Exide Cleanup Plan EIR. As shown in Table 4, emissions of NO_x, the pollutant that was determined to exceed the SCAQMD thresholds in the Exide Cleanup Plan EIR, would only increase by approximately 7.5 percent on a worst-case day. However, it is anticipated that on a typical day, the additional emissions from the proposed activities would be lower. For the purposes of this

Addendum, the maximum daily scenario conservatively assumed that the four parkways requiring the most excavation would occur simultaneously. However, on average, the additional NO_x emissions associated with the proposed modification to the project are anticipated to be approximately 6 pounds per day, or less than a 3 percent increase from the emissions analyzed in the Exide Cleanup Plan EIR. Furthermore, implementation of PDF AQ-4 (fugitive dust control measures), PDF AQ-5 (fence line monitoring for PM emissions), PDF AQ-6 (use of polyethylene sheeting to line all transport vehicles), PDF AQ-7 (decontamination of equipment by HEPA filter or wet wash), PDF AQ-8 (haul truck decontamination), PDF AQ-9 (DTSC-approved traffic plan for truck routes), and PDF AQ-10 (daily cleanup of driveways, sidewalks, streets) would ensure the proposed modification to the project would not result in any additional significant adverse air quality impacts or a substantial increase in the severity of the impacts of the other pollutants identified in the Exide Cleanup Plan EIR. In addition, since the proposed modification to the project would involve additional cleanup activities at each parkway lasting 1 to 2 days, the additional activities would not impact the same sensitive receptors for an extended period of time; thus, the proposed modification to the project would also not be anticipated to result in any additional significant adverse localized air quality impact or a substantial increase in the severity of impacts identified in the Exide Cleanup Plan EIR.

Conclusion: *The proposed modification would not result in a substantial increase in the severity of the impacts identified in the Exide Cleanup Plan EIR related to air quality.*

3.2.4 BIOLOGICAL RESOURCES

The Exide Cleanup Plan EIR indicated that the project would result in less than significant impacts to biological resources. The PIA is located in an urbanized area that does not contain suitable habitat for candidate, sensitive, or special status species or any riparian habitat or other sensitive natural habitat identified in local or regional plans, policies, or regulations by the California Department of Fish and Wildlife (CDFW) or U.S. Fish and Wildlife Service (USFWS), does not contain any state or federally protected wetlands, does not contain a designated wildlife corridor or native wildlife nursery sites, and is not located within a Habitat Conservation Plan or Natural Community Conservation Plan. The project would require removal of some ornamental landscaping, small trees and other vegetative cover that could support raptor and/or songbird nests. However, trees with a trunk of four (4) inches or more in diameter and vegetation that is four (4) feet or taller would not be removed. Also, migratory nongame native birds species are protected under the federal Migratory Bird Treaty Act (MBTA – 16 United States Code Sections 703-712). Therefore, cleanup activities must comply with federal regulations that require activities with the potential to disturb nesting birds. Additionally, areas within the biological root zone of trees or established shrubs (dripline) would be excavated to a maximum depth of six (6) inches to preserve the integrity and survivability of the trees. With the protection of mature trees during cleanup activities, the project would not cause the violation of any policy intended for the preservation of trees.

The proposed modification to project would be located within the PIA and involve ground disturbing activities comparable to ground disturbance associated with construction that was evaluated in the Exide Cleanup Plan EIR. Similar to the project, the proposed modification to the project would require removal of some ornamental landscaping, small trees and other vegetative cover that could support raptor and/or songbird nests. However, similar to the project, trees with a trunk of four (4) inches or more in diameter and vegetation that is four (4) feet or taller would not be removed and areas within the biological root zone of trees or established shrubs (dripline) would be excavated to a maximum depth of six (6) inches to preserve the integrity and survivability of the trees. The proposed cleanup activities would also be required to comply with federal regulations that require activities with the potential to disturb nesting birds. Given this, the proposed modification to the project would not result in new impacts or a substantial increase in the severity of impacts identified in the Exide Cleanup Plan EIR related to biological resources.

Conclusion: *The proposed modification to the project would not result in a substantial increase in the severity of impacts identified in the Exide Cleanup Plan EIR related to biological resources.*

3.2.5 CULTURAL RESOURCES

The Exide Cleanup Plan EIR indicated that the project would result in less than significant impacts to cultural resources. While the Exide Cleanup Plan EIR identified eight historical resources (including public buildings and apartment complexes, were identified as resource types with the potential to have associated landscaping features that contribute to their eligibility as historical resources under CEQA), with implementation of PDF CUL-1 (historical resource survey, landscape rehabilitation recommendations report, re-landscape inspection and monitoring report), the project would not cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5 of the CEQA Guidelines and thus impacts were found to be less than significant. In addition, while the Exide Cleanup Plan EIR identified a low potential for encountering unknown archaeological resources and human remains, with implementation of PDF CUL-2 (cultural resources sensitivity training for contractor crews, treatment plan, and final report) and PDF CUL-3 (State Health and Safety Code Section 7050.5 and CEQA Guidelines Section 15064.5[e] requirements), impacts to previously unrecorded archaeological resources and human remains, respectively, were found to be less than significant.

The proposed modification to the project would involve ground disturbing activities comparable to ground disturbance associated with construction that was evaluated in the Exide Cleanup Plan EIR. Four of the eight historical resources identified in the Exide Cleanup Plan EIR have the potential to be affected by the proposed modification to the project, as shown in Table 5 below. However, implementation of PDF CUL-1 would ensure potential impacts to these historical resources would be less than significant.

Table 5: Potentially Affected Historical Resources in the Proposed Modification to the Project Area

Address and APN	Resource Name	Description	Eligibility and CHR Status Code
1015 South Lorena Street, Los Angeles (5188021900)	Lorena Street Elementary School	LAUSD elementary school and campus representing the post-1933 Long Beach Earthquake period of school construction.	Eligible for the NRHP, CRHR, and Local Designation (Status Codes of 3S, 3CS, 5S3)
2901 East Olympic Boulevard, Los Angeles (5170023001)	Wyvernwood Garden Apartments	Mid-century style garden apartment complex constructed between 1938 and 1939.	Determined eligible for the NRHP and listed in the CRHR (Status Code 2S2)
3141 East Olympic Boulevard, Los Angeles (5190026904)	Lou Costello Jr. Recreation Center	Recreation facility that was financed, constructed, and operated by renowned comedians William “Bud” Abbott and Lou Costello, then acquired by city municipal parks.	Eligible for the NRHP, CRHR, and Local Designation (Status Codes of 3S, 3CS, 5S3)
6060 Miles Avenue, Huntington Park (6310019904)	Huntington Park High School	PWA Moderne style high school constructed in 1933.	Eligible for the NRHP (Status Code 3S)

Table 5: Potentially Affected Historical Resources in the Proposed Modification to the Project Area

Address and APN	Resource Name	Description	Eligibility and CHR Status Code
-----------------	---------------	-------------	---------------------------------

Notes:

APN = Assessor’s Parcel Number; CHR = California Historical Resource; CRHR = California Register of Historical Resources; LAUSD = Los Angeles Unified School District; NRHP = National Register of Historic Places; PWA = Public Works Administration

Sources:

(1) ESA/PCR. 2016. Draft Environmental Impact Report, Draft Remedial Action (Cleanup) Plan Offsite Properties within the Exide Preliminary Investigation Area, Volume 1 of 2. Prepared for Department of Toxic Substances Control;

(2) Office of Historic Preservation. 2003. California Historical Resource Status Codes. Available:

<https://ohp.parks.ca.gov/pages/1069/files/chrstatus%20codes.pdf>. Accessed May 2023.

In addition, similar to the project, there is a low potential for encountering unknown archaeological resources and human remains. However, implementation of PDF CUL-2 and PDF CUL-3 would ensure potential impacts to unknown archaeological resources and human remains would be less than significant. Given this, the proposed modification to the project would not result in a substantial increase in the severity of the impacts identified in the Exide Cleanup Plan EIR related to cultural resources.

Conclusion: *The proposed project modification cleanup activities would not result in a substantial increase in the severity of the impacts identified in the Exide Cleanup Plan EIR related to cultural resources.*

3.2.6 ENERGY

The Exide Cleanup Plan EIR indicated that impacts related to energy were found to be less than significant. The proposed modification to the project would involve additional cleanup activities (i.e., clearing/grubbing, soil excavation, soil import, and landscaping) that would consume energy in the form of fossil fuels (e.g., gasoline and diesel fuel) for construction equipment and on-road transportation (worker commutes, soil disposal and soil import) activities. Given the short-term, temporary nature, and relatively minor areas of excavation of the parkways, the additional energy consumed would be less than significant. In addition, the proposed modification to the project would continue to implement energy efficiency measures, such as utilizing equipment and haul trucks that are certified to current emission standards (PDF AQ-1 and PDF AQ-2) and engine idling limits (PDF AQ-3), which would result in efficient use of energy and the minimization or elimination of wasteful and unnecessary consumption of energy. Given this, the proposed modification to the project would not result in any a substantial increase in the severity of the impacts identified in the Exide Cleanup Plan EIR related to energy.

Conclusion: *The proposed modification to the project would not result in a substantial increase in the severity of impacts identified in the Exide Cleanup Plan EIR related to energy.*

3.2.7 GEOLOGY AND SOILS

The Exide Cleanup Plan EIR indicated that the project would result in less than significant impacts related to geology and soils. The PIA is located in a seismically active region and could be subject to strong ground shaking in the event of an earthquake on one of the many active Southern California earthquake faults. While the Puente Hills thrust fault underlies the PIA, no evidence has been found of surface rupture on this fault. In addition, according to the California Geological Survey (CGS), the PIA is not located within a designated Alquist-Priolo Earthquake Fault Zone or City-designated fault rupture study area. Based on these considerations, the potential for surface ground rupture in the PIA is considered low. Furthermore, cleanup activities would include shallow excavation and removal of lead-impacted soils, followed by

backfill with clean soil and top cover, which would not affect any of the buildings or other structures on the properties. The cleanup of lead-impacted soil would not change the fault rupture or strong seismic ground shaking risks in the PIA over existing conditions. Therefore, the project would not cause or accelerate geologic hazards related to fault rupture or strong seismic ground shaking, which could result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury.

In accordance with the CGS Hazard Zone Map for the Los Angeles Quadrangle and South Gate Quadrangle, parts of the PIA are located in a Liquefaction Hazard Zone. However, the PIA is relatively flat and urbanized, therefore, soils have been compacted and developments have been built according to federal and state seismic safety standards which reduce the risk of seismic related ground failure, including liquefaction. In addition, with property restoration if excavations are greater than 12 inches, structural soil fill would be used to achieve backfill to six (6) inches of final grade. Backfilled structural soil and clean topsoil would be placed and compacted in accordance with approved grading plans. Thus, the cleanup activities would not change the seismic-related ground failure risks in the PIA over existing conditions. In addition, the PIA does not have any areas located in a seismically-induced Landslide Hazard Zone; therefore, the project would result in no impacts associated with landslides.

In addition, the project would not be located on a geological unit or soil that is unstable, or that would become unstable as a result of the project. In addition, the project would have no impact on paleontological resources because they would only reach depths of 18 inches below the surface and would not encounter the fossiliferous older Quaternary deposits that exist at depth. The PIA is a highly developed urban area that has been previously graded prior to development and has been exposed to foundation and fill loads. The potential for subsidence and collapsible soils in the PIA is considered low because groundwater withdrawal is restricted and managed through reinjection where necessary and the area has already been subjected to foundation loads. Although surface soils would be removed from the sensitive land use properties, the removal of this soil would not create an unstable soil condition and would not affect any of the buildings or other structures on the property, including driveways, sidewalks, etc. Adherence to sound grading practices would ensure that cleanup activities would not create new areas of instability. In addition, implementation of Best Management Practices (BMPs) (e.g., silt fencing, etc.) would limit water infiltration into excavated areas or stockpiles, if they were to occur, and would minimize creation of unstable conditions.

The project could result in the removal of existing landscaping and excavation in up to 10,000 properties within the PIA and thus has the potential to result in substantial soil erosion or the loss of topsoil. However, landscape restoration and implementation of PDF GEO-1 through PDF GEO-4 (final grading plan and grading permit, compliance with the California State Water Resources Control Board General Permit for Storm Water Discharges Associated with Construction Activity Order, implementation of Stormwater Pollution Prevention Plan [SWPPP] and BMPs, and sampling of backfill material for each supplier to ensure it is free of contamination) would control erosion and soil loss at the properties, resulting in a less than significant impact.

The proposed modification to the project would be located within the PIA and involve similar cleanup activities as the project. The additional cleanup activities could result in additional soil erosion or loss of topsoil; however, similar to the project, the proposed modification to the project would include landscape restoration and would implement the project PDF GEO-1 through PDF GEO-4, which would control erosion and soil loss at the parkways. Given this, the proposed modification to the project would not result in a substantial increase in the severity of impacts identified in the Exide Cleanup Plan EIR related to geology and soils.

Conclusion: *The proposed modification to the project would not result in a substantial increase in the severity of impacts identified in the Exide Cleanup Plan EIR related to geology and soils.*

3.2.8 GREENHOUSE GAS EMISSIONS

The Exide Cleanup Plan EIR indicated that the project would result in less than significant impacts with mitigation related to greenhouse gas (GHG) emissions. Project GHG emissions were estimated to be result in approximately 12,644 metric tons of carbon dioxide equivalents (MT CO₂e) per year, which would exceed the 10,000 MT CO₂e threshold. Based on the additional cleanup activities associated with the proposed modification, it is anticipated that the cleanup of 6,426 parkways would generate approximately 863 additional MT CO₂e per year, based on the average size of the parkways and average soil excavation/soil import volumes. As detailed in the Exide Cleanup Plan EIR, Mitigation Measure GHG-1 requires that DTSC develop and implement a GHG Reduction Plan (GHG Plan) containing feasible strategies to reduce GHG emissions for the project. The GHG Plan requires contractors implementing the cleanup activities to track hours, miles, and fuel usage, among other parameters, related to the cleanup activities and report the resultant GHG emissions every month. Based on the information provided in the tracking system, the GHG Plan requires DTSC to implement, as needed, measures to ensure that the project emissions would not exceed, on an annual basis, the threshold of 10,000 MT CO₂e. The proposed modification to the project would continue to implement Mitigation Measure GHG-1; thus, the additional GHG emissions associated with the proposed modification to the project would be reduced to a less-than-significant level with mitigation. Therefore, the proposed modification to the project would not result in a substantial increase in the severity of the impacts identified in the Exide Cleanup Plan EIR related to GHG emissions.

Conclusion: *The proposed modification to the project would not result in a substantial increase in the severity of impacts identified in the Exide Cleanup Plan EIR related to GHG emissions.*

3.2.9 HAZARDS AND HAZARDOUS MATERIALS

The Exide Cleanup Plan EIR indicated that the project would result in less than significant impacts related to hazards and hazardous materials. Cleanup activities could create a hazard to the public or environment in the PIA. However, compliance with regulations and PDFs would control and limit exposure to the public or environment resulting in a less than significant impact with regard to routine transport or disposal of hazardous materials. Specifically, BMPs, including implementation of PDF AQ-4 (fugitive dust control) and PDF HAZ-1 (dry decontamination of haul and delivery trucks that come in contact with impacted material), would be implemented to ensure that onsite materials are not tracked into the offsite environment. Furthermore, registered hazardous waste transporters, trained in hazard assessment and prevention, are required to be used, which provides additional safeguards when staging and loading soils onto the transport trucks. In addition, employees conducting and overseeing the removal activities are required to be field certified to monitor and assess field hazards and take preventative action. Therefore, it is expected that equipment involved in the excavation and consolidation of soils would be operated in a manner that prevents an acute, accidental release to the environment. Also, as discussed previously in Section 3.2.7, Geology and Soils, a SWPPP would be implemented, which contains a list of BMPs to limit stormwater discharge from the property during cleanup activities. The onsite project manager would routinely conduct property inspections including during rain events to ensure that the stormwater handling measures are operating correctly and that repairs are made as necessary. In addition, as discussed previously in Section 3.2.3, Air Quality, TAC emissions were found to be less than significant and thus would result in less than significant cancer and non-cancer health risks. Also, lead exposure was further analyzed in the Exide Cleanup Plan EIR to determine potential impacts on child and fetal (pregnant adult) development using the DTSC LeadSpread 8 model; the results of the model found that the concentrations were well below detection limits normally encountered in blood testing laboratories.

While cleanup activities would potentially transport hazardous waste to disposal sites, the potential for upset and accident conditions would be low based on the risk level analysis conducted in the Exide Cleanup EIR, which determined that the risk level from upset conditions due to track collisions resulting in a release

of impacted material would be considered “acceptable (as-is)” over the total travel distance. Compliance with applicable hazardous materials regulations and PDFs HAZ-1 through HAZ-3 (dry decontamination of haul and delivery trucks that come in contact with impacted material, health and safety plan, and SWPPP) would reduce impacts related to potential upset and accident conditions to a less than significant level.

Cleanup activities would take place at potential schools and within one-quarter mile of existing or proposed schools. These activities would be scheduled outside of school hours where deemed necessary to protect community health or required by permitting jurisdictions. Compliance with applicable hazardous materials regulations and PDFs AQ-1 through AQ-4, PDFs HAZ-1 through HAZ-3, and PDF TRANS-3 (coordination with school authorities and operators of daycare centers), would reduce impacts related to potential student exposure to a less than significant level.

The PIA is included on a list of hazardous materials sites compiled pursuant to Government Code section 65952.5. The PIA, separate from the former Exide Facility, is included on the “Cortese” list pursuant to Government Code Section 65962.5. 36 The Cleanup Plan is designed to provide a plan for cleanup and protect the public and the environment from hazards and hazardous materials. Implementation of the Cleanup Plan would result in short-term transport and disposal of impacted materials, short-term potential for upset or accidental release, and short-term emissions; however, the project would implement PDFs AQ-4 and HAZ-1 through HAZ-3 to minimize these potential hazards and impacts would be less than significant level.

The PIA includes a number of designated City and County evacuation routes. However, cleanup activities would be performed consistent with permits and requirements of the local jurisdiction. If necessary, detours and diversions would minimize disruption to emergency vehicle access. Also, as discussed further below in Section 3.2.17, Transportation, implementation of PDF TRANS-1 (traffic management plan) requires the implementation of Construction Management Plans at all properties where cleanup activities will occur, which would minimize impacts related to emergency access. With implementation of PDF TRANS-1 and compliance with permits and requirements of the local jurisdictions, impacts would be less than significant impact with regard to interfering with an adopted emergency response plan or emergency evacuation plan.

The proposed modification to the project would be located within the PIA and involve similar cleanup activities as the project. The additional cleanup activities could create a hazard to the public or environment in the PIA. however, similar to the project, the proposed modification to the project would comply with the applicable hazardous materials regulations as well as implement the project PDFs discussed above (i.e., PDFs AQ-1 through AQ-4, PDFs HAZ-1 through HAZ-3, and PDFs TRANS-1 and TRANS-3). Given this, the proposed modification to the project would not result in a substantial increase in the severity of impacts identified in the Exide Cleanup Plan EIR related to hazards and hazardous materials.

Conclusion: *The proposed modification to the project would not result in a substantial increase in the severity of impacts identified in the Exide Cleanup Plan EIR related to hazards and hazardous materials.*

3.2.10 HYDROLOGY AND WATER QUALITY

The Exide Cleanup Plan EIR indicated that impacts would be less than significant related to hydrology and water quality. Cleanup activities could affect water quality in the PIA; however, compliance with federal, state, and local water quality regulations, BMPs (e.g., silt fencing and inlet control devices, etc.), and PDF GEO-1 through PDF GEO-4 (discussed previously in Section 3.2.7, Geology and Soils) would control erosion and potential stormwater runoff at the sensitive land use properties resulting in a less than significant impact with regard to violations of water quality standards and waste discharge requirements or degradation of water quality. Moreover, implementation of the project would have a beneficial impact and ultimately improve the quality of surface waters, groundwater, and downstream receiving waters as lead-impacted

soils would be removed from the PIA. Also, while cleanup activities would temporarily alter drainage patterns, upon completion of excavation activities, backfilling and grading would restore drainage patterns to existing conditions to the extent practicable with no increase of impervious surfaces. There would be no alteration of a stream or river. Compliance with applicable federal, state, and local water quality regulations, BMPs, and PDF GEO-1 through PDF GEO-4 would reduce impacts related to drainage patterns, erosion, and runoff to a less than significant level. Given this, the project would not create or contribute runoff that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff.

Based on the nature of lead-impacted soil in general, and soil data collected within the project area to date, it is extremely unlikely that perched groundwater would be impacted by the lead in surface soils. It is also unlikely that drinking water groundwater supplies have been impacted because lead is not generally mobile in soils. As part of the project analyzed in the Exide Cleanup Plan EIR, excavation for cleanup of properties within the PIA would include removal of lead-impacted soils to depths ranging from six (6) inches to a maximum of 18 inches bgs. Soil would not be removed beneath structures, patios, driveways, or other permanent features and roads or sidewalks. Excavations would be conducted using small construction equipment and/or hand tools. For larger properties, additional equipment could include mini excavators. The type of excavation equipment used during cleanup, method of excavation, and the shallow excavation depths would not deplete or interfere with groundwater recharge. In addition, cleanup activities would not require installation of pavement or result in an increase in any impermeable surfaces that would prevent surface water from seeping into the groundwater basin. Plastic sheeting used to protect excavation sites would be short-term and would cover relatively small areas at any point in time. Although impermeable, this sheeting would not interfere with groundwater recharge. Therefore, the project would not deplete groundwater supplies or interfere with groundwater recharge in a manner that would cause a net deficit in aquifer volume or a lowering of the local groundwater table level.

The sensitive land use properties within the PIA are located outside a 100-year flood zone. In addition, the Los Angeles County Flood Control District's Flood Protection Policy Map (1980) does not show flood control dams, reservoirs, debris basins or other water basins immediately upstream or downstream from the PIA. The nearest reservoir is the Silver Lake Reservoir, located in the Hollywood Hills several miles to the north of the PIA. Any flooding from the Silver Lake Reservoir would flow to the south and avoid directly entering the Los Angeles River Channel, which flows to the north of the Hollywood Hills in the vicinity of the reservoir. Because of the distance and estimated flood path of the reservoir, the PIA would not be at risk from inundation related to the failure of a levee or dam. Moreover, the project would not construct new structures. Therefore, the project would not expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam. Also, the PIA is located more than 15 miles from either Santa Monica Bay or San Pedro Bay, at elevations ranging from approximately 152 above mean sea level in the City of Bell to approximately 254 above mean sea level in the City of Los Angeles. No large hilltop or elevated water tanks or reservoirs are within the vicinity that could cause inundation by seiche. Because of the distance of the PIA from potential tsunami sources and elevation above mean sea level, the project would not be subject to inundation by tsunami. With the relatively flat topography of the area, development is not located on either natural or engineered hillsides that would be subject to mudflow in a heavy storm event.

The proposed modification to the project would be located within the PIA and involve similar cleanup activities as the project. The additional cleanup activities could affect water quality and temporarily alter drainage patterns in the PIA; however, similar to the project, the proposed modification to the project would comply with the applicable federal, state, and local water quality regulations as well as implement the project BMPs and PDF GEO-1 through PDF GEO-4. Given this, the proposed modification to the project would not result in a substantial increase in the severity of impacts identified in the Exide Cleanup Plan EIR related to hydrology and water quality.

Conclusion: *The proposed modification to the project would not result in a substantial increase in the severity of impacts identified in the Exide Cleanup Plan EIR related to hydrology and water quality.*

3.2.11 LAND USE AND PLANNING

The Exide Cleanup Plan EIR indicated that the project would result in less than significant impacts related to land use and planning as the project, which consists of cleanup of lead-impacted soil within the PIA, would not involve development or other changes in land use that would physically divide an established community or conflict with applicable land use plan, policy, or regulation of agency with jurisdiction over the project. Similar to the project, the proposed modification to the project, which entails cleanup of lead-impacted soil in parkways within the PIA, would also not involve development or other changes in land use that would physically divide an established community or conflict with applicable land use plan, policy, or regulation of agency with jurisdiction over the project. Given this, the proposed modification to the project would not result in new impacts or a substantial increase in the severity of impacts identified in the Exide Cleanup Plan EIR related to land use and planning.

Conclusion: *The proposed modification to the project would not result in new impacts or a substantial increase in the severity of impacts identified in the Exide Cleanup Plan EIR related to land use and planning.*

3.2.12 MINERAL RESOURCES

The Exide Cleanup Plan EIR indicated that the project would result in no impact to mineral resources given that the PIA is not located in a designated Mineral Resources Zone. In addition, given that the land within the PIA is fully developed, there has been no use or availability to minerals or petroleum in the area. Furthermore, the project, which would consist of excavation up to 18 inches, would not alter land uses in the area. The proposed modification to the project would be located in the PIA and would consist of similar cleanup activities as the project. Given this, the proposed modification to the project would result in no impact to mineral resources.

Conclusion: *The proposed modification to the project would result in no impact to mineral resources.*

3.2.13 NOISE

The Exide Cleanup Plan EIR indicated that the project would result in significant and unavoidable impacts to noise (i.e., violations of established noise standards and substantial temporary increases in ambient noise levels). While the Exide Cleanup Plan EIR identified three PDFs (PDF NOI-1 through NOI-3 [implementing noise compliant reporting, Best Management Construction Practices, and equipment noise reduction measures, respectively]) and one mitigation measure (MM NOI-1 [implementing noise barriers]) to reduce construction noise levels at sensitive receptors, due to the infeasibility of installing temporary noise barriers at all locations and at all times, impacts could not be reduced to less than significant.

The scope of noise and vibration-generating activities related to the proposed modification to the project would be nearly identical to those detailed for the project in the Exide Cleanup Plan EIR. The primary difference between the two is the proposed modification to the project would occur solely at or beyond the sidewalk boundaries of studied sensitive receptor properties. Construction activities around these sidewalk work areas would be occurring at a greater distance from sensitive receptors than those analyzed in the Exide Cleanup Plan EIR. Both noise and vibratory energy dissipate with distance from the source. Thus, the noise and vibration effects resulting from the proposed modification to the project would generate lower noise and vibration levels than those identified in the Exide Cleanup Plan EIR. In addition, while the proposed modification to the project would generate truck trips (i.e., four truck trips per day), as discussed

further below in Section 3.2.17, Transportation, in this Addendum, these are not considered significant in relation to the overall project-related truck trips; furthermore, these additional truck trips would not result in a notable change in noise exposure at any receptors. Since the proposed modification to the project would not subject receptors to greater levels of noise or vibration than those already accounted for in the Exide Cleanup Plan EIR, additional and/or more stringent mitigation measures are not required. Therefore, the proposed modification to the project would not result in a substantial increase in the severity of impacts identified in the Exide Cleanup Plan EIR related to noise.

Conclusion: *The proposed modification to the project would not result in a substantial increase in the severity of impacts identified in the Exide Cleanup Plan EIR related to noise.*

3.2.14 POPULATION AND HOUSING

The Exide Cleanup Plan EIR indicated that the project would result in less than significant impacts related to population and housing. The project would not result in changes to existing land uses and does not include the construction of houses, businesses, or roadways. Implementation of the project would temporarily require workers and visitors traveling to properties within the PIA; however, due to the temporary nature of cleanup activities, the workers and visitors are not expected to create a substantial population growth. In addition, in order to meet the demands and timelines for the cleanup, a Job and Development Training Program was developed for the project as detailed in the Exide Cleanup Plan EIR, which entailed training residents of the community with environmental skills, health and safety training, and support for job placement during the cleanup. As such, some of the workers conducting the cleanup would be local residents and are expected to commute to the properties from existing residences in the project vicinity. Given this, the project would not directly or indirectly induce substantial population growth in the area. In addition, residents would be able to remain on the property during cleanup activities, though an option to relocate some residents during the cleanup could be available. Relocation of residents would be to local hotels and thus would not require the construction of new replacement housing. Following completion of cleanup activities, the same number of residences would remain within the PIA. Thus, the project would not displace existing housing or people, necessitating the construction of replacement housing elsewhere.

The proposed modification to the project would involve similar cleanup activities as the project with the exception that such cleanup activities would occur in the public right-of-way (parkways) and not within residential, school, daycare, or park properties. Similar to the project, due to the temporary nature of cleanup activities, the workers and visitors are not expected to create a substantial population growth; furthermore, the proposed modification to the project would implement a Job and Development Training Program similar to the project and thus some of the workers may consist of local residents. Also, given the cleanup activities would not occur on residential property, it is assumed the option for temporary relocation would not be needed. Regardless, the proposed modification to the project would not displace existing housing or people, necessitating the construction of replacement housing elsewhere. Given this, the proposed modification to the project would not result in new impacts or in a substantial increase in the severity of impacts identified in the Exide Cleanup Plan EIR related to population and housing.

Conclusion: *The proposed modification to the project would not result in new impacts or in a substantial increase in the severity of impacts identified in the Exide Cleanup Plan EIR related to population and housing.*

3.2.15 PUBLIC SERVICES

The Exide Cleanup Plan EIR indicated that impacts would be less than significant related to public services. The project does not include the construction or alteration of governmental facilities, other than cleanup on sensitive land use properties, which could include schools and parks. Cleanup of schools or properties adjacent to schools would be scheduled during school breaks. Following completion of cleanup activities,

the same number of residences, schools, parks and libraries would remain within the PIA. In addition, a population increase would not occur as a result of the project that would require construction of new governmental facilities in order to maintain acceptable service ratios, response times or other performance objectives.

The proposed modification to the project would involve similar cleanup activities as the project with the exception that such cleanup activities would occur in the public right-of-way (parkways) and not within residential, school, daycare, or park properties. Similar to the project, a population increase would not occur as a result of the project that would require construction of new governmental facilities in order to maintain acceptable service ratios, response times or other performance objectives. Furthermore, given that the proposed modification to the project would only occur within the public-right-of-way, in contrast to the project, it would not impact schools or parks. Given this, the proposed modification to the project would not result in any new impacts or a substantial increase in the severity of impacts identified in the Exide Cleanup Plan EIR related to public services.

Conclusion: *The proposed modification to the project would not result in any new impacts or a substantial increase in the severity of impacts identified in the Exide Cleanup Plan EIR related to public services.*

3.2.16 RECREATION

The Exide Cleanup Plan EIR indicated that the project would result in less than significant impacts related to recreation. A total of 16 parks were identified within the PIA that may experience disruptions in availability while cleanup takes place, however, following completion of cleanup activities, the same number of parks and recreational facilities would remain within the PIA. The cleanup of the parks is not expected to attract new users or increase the use of the parks by residents. As such, a localized population increase would not occur as a result of the project. Therefore, the project would not increase the use of existing parks or other recreational facilities such that substantial physical deterioration of the facilities would occur.

The proposed modification to the project would involve similar cleanup activities as the project with the exception that such cleanup activities would occur in the public right-of-way (parkways). Thus, the proposed modification to the project, in contrast to the project, would result in no disruptions to parks or recreational facilities in the PIA. Given this, the proposed modification to the project would result in no new impacts or a substantial increase in the severity of the impacts identified in the Exide Cleanup Plan EIR related to recreation.

Conclusion: *The proposed modification to the project would result in no new impacts or a substantial increase in the severity of the impacts identified in the Exide Cleanup Plan EIR related to recreation.*

3.2.17 TRANSPORTATION

The Exide Cleanup Plan EIR indicated that the project would result in less than significant impacts related to transportation and traffic. The Exide Cleanup Plan EIR concluded the addition of construction truck vehicles onto the local street system would contribute to increased traffic in the project vicinity. The project would temporarily exceed Level of Service (LOS) at study intersections under the Existing Plus Project (2016) evaluation scenario. However, because traffic increases would be transitory and temporary, and because PDF TRANS-1 (traffic management plan) would incrementally reduce peak hour trips through avoidance of peak hours to the extent feasible and by consolidating trips, impacts to intersection LOS were found to be less than significant. In addition, cleanup activities would occur within residences, parks, daycares and schools, and would not require excavation within roadways or closure of roadways. During cleanup activities, lanes may be closed or blocked due to limited space for equipment staging and soil handling activities. In addition, some sidewalks may be closed or blocked where excavation would extend

to the sidewalk. However, if lane or sidewalk closures are needed for cleanup activities, it would be completed in accordance with City or County permits and requirements. During cleanup activities, roadway access would be maintained by traffic detours and diversions, including implementation of PDF TRANS-1 (Traffic Management Plan), which would minimize disruptions to traffic flow and emergency vehicle access, as well as pedestrian, bicycle, and transit access. For example, implementation of PDF TRANS 1 would require traffic control, coordination of truck traffic, the use of flagmen, installation of safety barriers, pedestrian signage along sidewalks, and assistance of pedestrians and cyclists. With the implementation of PDF TRANS-1, potential conflicts between emergency vehicles and cleanup activities and other emergency access impacts would be reduced to less than significant levels. Also, the project would not require changes in the operational design of streets or the development of new streets. Construction traffic could contribute to roadway hazards because of the large volume of trucks and construction activity moving in and out of the streets. The Traffic Management Plan under PDF TRANS-1, coordination with jurisdictions to avoid roadwork activity under PDF TRANS-2, and limited exposure of school children under PDF TRANS-3, would reduce this impact to a less than significant level. Implementation of the PDF TRANS-1 through PDF TRANS-3 would also reduce impacts to bicycle and pedestrian facilities and bus services to less than significant levels.

The proposed modification to the project would generate a small increase in construction trip traffic (i.e., four trips per day) which would not cause any significant impacts at studied intersections and is not anticipated to contribute to a significant increase in the overall congestion in the project vicinity. In addition, any truck trips would be limited to the length of time required for the proposed modification to the project's construction. The proposed cleanup of additional areas within PIA (approximately 6,426 parkways decision units), which were not covered in the Exide Cleanup Plan EIR, includes the excavation and disposal procedures for soil containing lead, arsenic, antimony, cadmium, copper, and/or zinc in exceedance of their respective screening criteria (referred to as the "Parkways Cleanup Goal 80 mg/kg"). The excavation and haul activities would result in approximately 2,158 truckloads of soil for off-site disposal which would account for approximately 2 hauling truck trips per day. The proposed modification to the project also includes restoration of the parkways with clean soil and replacement landscaping. The soil import (clean fill) and landscaping activities would result in approximately 2,878 truckloads of soil for import which would account for approximately 2 truck trips per day. These additional truck trips are not considered significant in relation to the overall project-related truck trips and the PDF TRANS-1 through PDF TRANS-3 would also apply to the excavation and haul activities and soil import and landscaping activities. In addition, while some lanes and sidewalks may be closed or blocked during parkway cleanup activities, such closures or blockages would be completed in accordance with City or County permits and requirements. Furthermore, implementation of PDF TRANS-1 through PDF TRANS-3 would be required, which would minimize disruptions to traffic flow and emergency vehicle access, as well as pedestrian, bicycle, and transit access. Therefore, the proposed modification to the project would not result in a substantial increase in the severity of the impacts identified in the Exide Cleanup Plan EIR related to transportation and traffic.

Senate Bill 743 and Vehicle Miles Traveled

Senate Bill (SB) 743 was signed by Governor Brown in 2013 and required the Governor's Office of Planning and Research (OPR) to amend the CEQA Guidelines to provide an alternative to level of service (LOS) for evaluating transportation impacts. SB 743 specified that the new criteria should promote the reduction of greenhouse gas emissions, promote the development of multimodal transportation networks, and promote a diversity of land uses. The bill also specified that delay-based LOS could no longer be considered an indicator of a significant impact on the environment. In response, Section 15064.3 was added to the CEQA Guidelines beginning January 1, 2019. Section 15064.3(c) states that the provisions of the section shall apply statewide beginning on July 1, 2020.

CEQA Guidelines Section 15064.3, Determining the Significance of Transportation Impacts, states that vehicle miles traveled (VMT) is the most appropriate measure of transportation impacts and provides lead agencies with the discretion to choose the most appropriate methodology and thresholds for evaluating VMT. CEQA Guidelines Section 15064.7(c) allow lead agencies to adopt their own thresholds of significance that are supported by substantial evidence.

Even though the excavation, hauling activities, soil import, and landscaping activities from the proposed modification to the project would create vehicular trips, these temporary trips would only occur during construction activities; thus, no long-term VMT would be generated by the proposed modification to the project. Given this and the negligible amount of daily vehicle trips (four per day), no VMT assessment is required for the proposed modification to the project.

Conclusion: *The proposed modification to the project would not result in a substantial increase in the severity of the impacts identified in the Exide Cleanup Plan EIR related to transportation and traffic.*

3.2.18 TRIBAL CULTURAL RESOURCES

The Exide Cleanup Plan EIR indicated that the project would have no impact on Tribal cultural resources. No ancestral Native American archaeological resources were identified in the Exide Cleanup Plan EIR project area and Sacred Lands File searches through the Native American Heritage Commission (NAHC) in September 2015 and November 2016 were negative, indicating the project area was not sensitive for Tribal cultural resources. DTSC wrote to 11 California Native American tribal representatives identified by the NAHC in 2015 and as well as in 2016 prior to and during the preparation of the Exide Cleanup Plan EIR. No responses were received from these two rounds of outreach letters. In addition, no specific comments on the potential for Tribal cultural resources were received during the comment period for the Exide Cleanup Plan EIR.

The proposed modification to the project would involve ground disturbing activities comparable to level of ground disturbance associated with the project that was evaluated in the Exide Cleanup Plan EIR. Although no impact on Tribal cultural resources was identified in the Exide Cleanup Plan EIR, previously unidentified archaeological resources that may also be Tribal cultural resources could potentially be located beneath the project site. With implementation of PDF CUL-2 and PDF CUL-3 discussed above in Section 3.2.5, Cultural Resources, which were adopted for cultural resources, the proposed modification to the project would not result in any new impacts related to Tribal cultural resources.

Conclusion: *The proposed project modification cleanup activities would not result in any new impacts identified in the Exide Cleanup Plan EIR related to Tribal cultural resources.*

3.2.19 UTILITIES AND SERVICE SYSTEMS

The Exide Cleanup Plan EIR indicated that the project would have less than significant impacts related to utilities and service systems. Implementation of the project would not include the development of uses that would generate new wastewater flows, nor would the project involve a change in land use that would result in greater average daily flows than are currently produced within the PIA. During the cleanup activities, portable toilets would be available for workers. Portable toilets are not flushed directly into the municipal treatment system. Since the project anticipates no population increase and much of the project's workforce are expected to already reside in the region, no discernable increase in wastewater treatment in excess of the available capacity is anticipated. Also, while water from existing water lines would be used for dust control purposes during excavation and installation of replacement landscaping, the volume of water used would represent a small incremental increase in the region's total water demand and would not exceed the delivery capacity of existing water lines. Thus, the construction and expansion of new water and wastewater treatment facilities would not be required. In addition, the project would not result in new impermeable

surfaces and BMPs discussed previously in Section 3.2.10, Hydrology and Water Quality, would be implemented to control any surface runoff from exposed sites during cleanup; as such, the project would not impact existing storm drain systems and would not require the construction or expansion of storm drain facilities. Additionally, the landfill facilities identified for soil disposal (i.e., South Yuma County Landfill in Yuma, Arizona, La Paz Landfill in Parker, Arizona, or the Kettleman Hills Facility in Kettleman City, California for lead-impacted soils; and the Chiquita Canyon Landfill in Castaic, California, or the Simi Valley Landfill in Simi Valley, California for non-hazardous waste), from the project were determined to have sufficient permitted capacity to accommodate the project's solid waste disposal needs. Furthermore, the project would be required to comply with federal, state, and local statutes and regulations related to solid waste. Lastly, the project would not require the construction or expansion of electric power, natural gas, or telecommunication facilities.

Similar to the project, the proposed modification to the project would not include development of uses that would generate new wastewater flows, nor would it involve a change in land use that would result in greater average daily flows than are currently produced within the PIA. Portable toilets would also be available for workers similar to the project and no population increase would occur as a result of the project. Also, while the proposed modification to the project would result in a minor increase in the demand for domestic water used for the maximum watering and decontamination, it would not exceed the delivery capacity of existing water lines. Thus, the construction and expansion of new water and wastewater treatment facilities would not be required. In addition, similar to the project, the proposed modification to the project would not result in new impermeable surfaces and project BMPs would be implemented to control any surface runoff from exposed sites during cleanup; as such, the proposed modification to the project would not impact existing storm drain systems and would not require the construction or expansion of storm drain facilities. Additionally, the proposed modification to the project would use the same landfill facilities identified for soil disposal from the project, which would still have sufficient permitted capacity to accommodate the solid waste disposal needs of the proposed modification to the project (i.e., approximately 18.6 cubic yards per day [15.7 tons per day]).³ Furthermore, the proposed modification to the project would be required to comply with federal, state, and local statutes and regulations related to solid waste. Lastly, the proposed modification to the project would not require the construction or expansion of electric power, natural gas, or telecommunication facilities. Given this, the proposed modification to the project would not result in new impacts or a substantial increase in the severity of impacts identified in the Exide Cleanup Plan EIR related to utilities and service systems.

Conclusion: *The proposed modification to the project would not result in new impacts or a substantial increase in the severity of impacts identified in the Exide Cleanup Plan EIR related to utilities and service systems.*

3.2.20 WILDFIRE

As indicated in the Exide Cleanup Plan EIR, the project would result in no impact related to wildfire as the PIA is located in an urbanized area that is outside of the Very High Fire Hazard Severity Zones (VHFHSZ) according to the California Department of Forestry and Fire Protection (CAL FIRE)'s Fire Hazard Severity

³ Landfill data sources: (1) South Yuma County Landfill. 2023. Permits & Information. Available at: <http://www.southyumacountylandfill.com/permits.php> (accessed May 2023); (2) La Paz County. 2023. Landfill & Transfer Stations. Available at: <http://www.co.la-paz.az.us/468/Landfill-Transfer-Stations> (accessed May 2023); (3) Waste Management. 2023. Kettleman Hills Facility – Facility Expansion. Available at: <https://kettlemanhillslandfill.wm.com/facility-expansion/index.jsp> (accessed May 2023); (4) California Department of Resources Recycling and Recovery (CalRecycle). 2023. SWIS Facility/Site Summary – Chiquita Canyon Sanitary Landfill (19-AA-0052). Available at: <https://www2.calrecycle.ca.gov/SolidWaste/Site/Summary/1037> (accessed May 2023); and (5) CalRecycle. 2023. SWIS Facility/Site Activity Details – Simi Valley Landfill & Recycling center (56-AA-0007). Available at: <https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/608?siteID=3954> (accessed May 2023).

Zones Map for Los Angeles County. The proposed modification to the project would be located within the PIA and a review of the latest CAL FIRE's Fire Hazard Severity Zones Map for Los Angeles County indicates that the PIA remains outside a VHFHSZ.⁴ The PIA is also not located in or near state responsibility areas.⁵ Given this, the proposed modification to the project would result in no impact to wildfire.

Conclusion: *The proposed modification to the project would result in no impact related to wildfire.*

3.2.21 MANDATORY FINDINGS OF SIGNIFICANCE

The Exide Cleanup Plan EIR indicated that the project would result in significant and unavoidable impacts for air quality (with regard to regional NOx emissions and cumulatively significant with regard to NOx and ozone emissions) and noise (with regard to violations of established noise standards and substantial temporary increases in ambient noise levels). However, as discussed above, the proposed modification to the project would not result in a substantial increase in the severity of the significant and unavoidable air quality and noise impacts identified in the Exide Cleanup Plan EIR.

Conclusion: *The proposed modification to the project would not result in a substantial increase in the severity of the significant and unavoidable air quality and noise impacts identified in the Exide Cleanup Plan EIR.*

3.3 CONCLUSION

Based on the forgoing analysis, DTSC has determined that the potential environmental impacts associated with the proposed modification to the project have been analyzed and addressed in the previously prepared Exide Cleanup Plan EIR and this Addendum and would not result in conditions outlined in State CEQA Guidelines Section 15162 that would require preparation of a subsequent EIR.

⁴ CAL FIRE. 2023. FHSZ Viewer. Available at: <https://egis.fire.ca.gov/FHSZ/> (accessed May 2023).

⁵ *Ibid.*

APPENDICES

Appendix A
Air Quality and Greenhouse Gas Emissions –
CalEEMod Modeling Output Data

Exide Preliminary Investigation Area for Parkways Cleanup (80 mg/kg goal) - Maximum - Los Angeles-South Coast County, Winter

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

Exide Preliminary Investigation Area for Parkways Cleanup (80 mg/kg goal) - Maximum

Los Angeles-South Coast County, Winter

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Other Non-Asphalt Surfaces	5.14	1000sqft	0.12	5,135.91	0

1.2 Other Project Characteristics

Urbanization	Urban	Wind Speed (m/s)	2.2	Precipitation Freq (Days)	33
Climate Zone	9			Operational Year	2023
Utility Company	Southern California Edison				
CO2 Intensity (lb/MW hr)	390.98	CH4 Intensity (lb/MW hr)	0.033	N2O Intensity (lb/MW hr)	0.004

1.3 User Entered Comments & Non-Default Data

Project Characteristics - Cleanup activities only (no operations) - based on maximum values

Land Use - Based on the 4 maximum sizes of parkway (4 parkways per day)

Construction Phase - Based on anticipated schedule of 1-2 days per clean up site.

Off-road Equipment - Clean up specific equipment - assumes 2 parkways per equipment set - 4 parkways per day.

Off-road Equipment - Clean up specific equipment - assumes 2 parkways per equipment set - 4 parkways per day.

Grading - Export based on top 4 maximum excavation amounts. Assumes ratio of 1.33 of soil import to soil export.

Trips and VMT - Worker trips assumes 6 LDAs + 6 LDTs + 1 visitor per day; Vendor trips assumes 1 water truck and 1 mobile refueler - HHDT; Haul truck trips based on 17CY truck capacity. Haul truck trip lengths consistent with EIR analysis.

Area Coating - No operational emissions.

Construction Off-road Equipment Mitigation - Assumes implementation of PDFs of requiring Tier 4 Final for equipment >50hp and implementation of SCAQMD fugitive dust control requirements.

Exide Preliminary Investigation Area for Parkways Cleanup (80 mg/kg goal) - Maximum - Los Angeles-South Coast County, Winter

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

Table Name	Column Name	Default Value	New Value
tblAreaCoating	Area_Parking	308	0
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	2.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	4.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	4.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	4.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	2.00
tblConstEquipMitigation	Tier	No Change	Tier 4 Final
tblConstEquipMitigation	Tier	No Change	Tier 4 Final
tblConstEquipMitigation	Tier	No Change	Tier 4 Final
tblConstEquipMitigation	Tier	No Change	Tier 4 Final
tblConstEquipMitigation	Tier	No Change	Tier 4 Final
tblConstructionPhase	NumDays	2.00	1.00
tblConstructionPhase	NumDays	2.00	1.00
tblConstructionPhase	PhaseEndDate	4/20/2022	4/4/2022
tblConstructionPhase	PhaseStartDate	4/19/2022	4/4/2022
tblGrading	AcresOfGrading	0.00	1.50
tblGrading	AcresOfGrading	0.00	0.75
tblGrading	MaterialExported	0.00	231.00
tblGrading	MaterialImported	0.00	307.00
tblOffRoadEquipment	LoadFactor	0.36	0.36
tblOffRoadEquipment	LoadFactor	0.20	0.20
tblOffRoadEquipment	LoadFactor	0.38	0.38
tblOffRoadEquipment	LoadFactor	0.37	0.37
tblOffRoadEquipment	LoadFactor	0.20	0.20
tblOffRoadEquipment	LoadFactor	0.37	0.37
tblOffRoadEquipment	LoadFactor	0.36	0.36
tblOffRoadEquipment	OffRoadEquipmentType		Rubber Tired Loaders
tblOffRoadEquipment	OffRoadEquipmentType		Forklifts

Exide Preliminary Investigation Area for Parkways Cleanup (80 mg/kg goal) - Maximum - Los Angeles-South Coast County, Winter

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

tblOffRoadEquipment	OffRoadEquipmentType		Excavators
tblOffRoadEquipment	OffRoadEquipmentType		Skid Steer Loaders
tblOffRoadEquipment	OffRoadEquipmentType		Forklifts
tblOffRoadEquipment	OffRoadEquipmentType		Skid Steer Loaders
tblOffRoadEquipment	OffRoadEquipmentType		Rubber Tired Loaders
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	0.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	0.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	2.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	0.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	0.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	0.00
tblOffRoadEquipment	UsageHours	6.00	0.00
tblOffRoadEquipment	UsageHours	6.00	0.00
tblOffRoadEquipment	UsageHours	7.00	8.00
tblOffRoadEquipment	UsageHours	6.00	0.00
tblOffRoadEquipment	UsageHours	6.00	0.00
tblOffRoadEquipment	UsageHours	7.00	0.00
tblTripsAndVMT	HaulingTripLength	20.00	50.00
tblTripsAndVMT	HaulingTripLength	20.00	30.00
tblTripsAndVMT	HaulingTripNumber	29.00	28.00
tblTripsAndVMT	VendorTripNumber	0.00	4.00
tblTripsAndVMT	VendorTripNumber	0.00	4.00
tblTripsAndVMT	VendorVehicleClass	HDT_Mix	HHDT
tblTripsAndVMT	VendorVehicleClass	HDT_Mix	HHDT
tblTripsAndVMT	WorkerTripNumber	25.00	26.00
tblTripsAndVMT	WorkerTripNumber	15.00	26.00

2.0 Emissions Summary

Exide Preliminary Investigation Area for Parkways Cleanup (80 mg/kg goal) - Maximum - Los Angeles-South Coast County, Winter

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	1.8700e-003	0.0000	5.2000e-004	0.0000		0.0000	0.0000		0.0000	0.0000		1.1200e-003	1.1200e-003	0.0000		1.2000e-003
Energy	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Mobile	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Total	1.8700e-003	0.0000	5.2000e-004	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		1.1200e-003	1.1200e-003	0.0000	0.0000	1.2000e-003

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	1.8700e-003	0.0000	5.2000e-004	0.0000		0.0000	0.0000		0.0000	0.0000		1.1200e-003	1.1200e-003	0.0000		1.2000e-003
Energy	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Mobile	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Total	1.8700e-003	0.0000	5.2000e-004	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		1.1200e-003	1.1200e-003	0.0000	0.0000	1.2000e-003

Exide Preliminary Investigation Area for Parkways Cleanup (80 mg/kg goal) - Maximum - Los Angeles-South Coast County, Winter

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Clearing Grubbing Soil Excavation	Grading	4/4/2022	4/4/2022	5	1	
2	Soil Import Landscaping	Grading	4/5/2022	4/5/2022	5	1	

Acres of Grading (Site Preparation Phase): 0

Acres of Grading (Grading Phase): 1.5

Acres of Paving: 0.12

Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 0; Non-Residential Outdoor: 0; Striped Parking Area: 0 (Architectural Coating – sqft)

OffRoad Equipment

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Soil Import Landscaping	Graders	0	0.00	187	0.41
Soil Import Landscaping	Rubber Tired Dozers	0	0.00	247	0.40
Soil Import Landscaping	Tractors/Loaders/Backhoes	0	0.00	97	0.37
Clearing Grubbing Soil Excavation	Rubber Tired Loaders	2	8.00	203	0.36
Clearing Grubbing Soil Excavation	Forklifts	2	8.00	89	0.20
Clearing Grubbing Soil Excavation	Graders	0	0.00	187	0.41
Clearing Grubbing Soil Excavation	Excavators	2	8.00	158	0.38
Clearing Grubbing Soil Excavation	Skid Steer Loaders	2	8.00	65	0.37
Soil Import Landscaping	Forklifts	2	8.00	89	0.20

Exide Preliminary Investigation Area for Parkways Cleanup (80 mg/kg goal) - Maximum - Los Angeles-South Coast County, Winter

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

Soil Import Landscaping	Skid Steer Loaders	2	8.00	65	0.37
Clearing Grubbing Soil Excavation	Rubber Tired Dozers	0	0.00	247	0.40
Soil Import Landscaping	Rubber Tired Loaders	2	8.00	203	0.36
Clearing Grubbing Soil Excavation	Tractors/Loaders/Backhoes	2	8.00	97	0.37

Trips and VMT

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Soil Import Landscaping	6	26.00	4.00	38.00	14.70	6.90	30.00	LD_Mix	HHDT	HHDT
Clearing Grubbing Soil Excavation	10	26.00	4.00	28.00	14.70	6.90	50.00	LD_Mix	HHDT	HHDT

3.1 Mitigation Measures Construction

Use Cleaner Engines for Construction Equipment

Water Exposed Area

3.2 Clearing Grubbing Soil Excavation - 2022

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					1.6169	0.0000	1.6169	0.1757	0.0000	0.1757			0.0000			0.0000
Off-Road	1.6889	16.9732	19.1786	0.0364		0.7661	0.7661		0.7048	0.7048		3,521.5935	3,521.5935	1.1390		3,550.0674
Total	1.6889	16.9732	19.1786	0.0364	1.6169	0.7661	2.3829	0.1757	0.7048	0.8805		3,521.5935	3,521.5935	1.1390		3,550.0674

Exide Preliminary Investigation Area for Parkways Cleanup (80 mg/kg goal) - Maximum - Los Angeles-South Coast County, Winter

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.2 Clearing Grubbing Soil Excavation - 2022

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.2776	11.3945	2.1803	0.0424	1.2244	0.0868	1.3112	0.3356	0.0831	0.4187		4,642.7675	4,642.7675	0.2496	0.7367	4,868.5568
Vendor	8.8100e-003	0.2935	0.0930	9.3000e-004	0.0242	1.7700e-003	0.0260	6.6400e-003	1.6900e-003	8.3300e-003		101.7135	101.7135	5.1700e-003	0.0161	106.6506
Worker	0.0963	0.0726	0.9409	2.5200e-003	0.2906	1.8600e-003	0.2925	0.0771	1.7100e-003	0.0788		256.1346	256.1346	7.4100e-003	6.9500e-003	258.3915
Total	0.3828	11.7606	3.2141	0.0458	1.5392	0.0905	1.6297	0.4193	0.0865	0.5058		5,000.6156	5,000.6156	0.2622	0.7598	5,233.5989

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					0.7276	0.0000	0.7276	0.0791	0.0000	0.0791			0.0000			0.0000
Off-Road	0.4984	4.0352	23.7198	0.0364		0.0597	0.0597		0.0597	0.0597	0.0000	3,521.5935	3,521.5935	1.1390		3,550.0674
Total	0.4984	4.0352	23.7198	0.0364	0.7276	0.0597	0.7873	0.0791	0.0597	0.1388	0.0000	3,521.5935	3,521.5935	1.1390		3,550.0674

Exide Preliminary Investigation Area for Parkways Cleanup (80 mg/kg goal) - Maximum - Los Angeles-South Coast County, Winter

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.2 Clearing Grubbing Soil Excavation - 2022

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.2776	11.3945	2.1803	0.0424	1.2244	0.0868	1.3112	0.3356	0.0831	0.4187		4,642.7675	4,642.7675	0.2496	0.7367	4,868.5568
Vendor	8.8100e-003	0.2935	0.0930	9.3000e-004	0.0242	1.7700e-003	0.0260	6.6400e-003	1.6900e-003	8.3300e-003		101.7135	101.7135	5.1700e-003	0.0161	106.6506
Worker	0.0963	0.0726	0.9409	2.5200e-003	0.2906	1.8600e-003	0.2925	0.0771	1.7100e-003	0.0788		256.1346	256.1346	7.4100e-003	6.9500e-003	258.3915
Total	0.3828	11.7606	3.2141	0.0458	1.5392	0.0905	1.6297	0.4193	0.0865	0.5058		5,000.6156	5,000.6156	0.2622	0.7598	5,233.5989

3.3 Soil Import Landscaping - 2022

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					0.8301	0.0000	0.8301	0.0911	0.0000	0.0911			0.0000			0.0000
Off-Road	0.9527	10.0502	8.1599	0.0198		0.4131	0.4131		0.3801	0.3801		1,914.0849	1,914.0849	0.6191		1,929.5613
Total	0.9527	10.0502	8.1599	0.0198	0.8301	0.4131	1.2432	0.0911	0.3801	0.4712		1,914.0849	1,914.0849	0.6191		1,929.5613

Exide Preliminary Investigation Area for Parkways Cleanup (80 mg/kg goal) - Maximum - Los Angeles-South Coast County, Winter

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.3 Soil Import Landscaping - 2022

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.2408	9.5820	1.9958	0.0349	0.9973	0.0710	1.0683	0.2734	0.0679	0.3413		3,825.4367	3,825.4367	0.2044	0.6070	4,011.4355
Vendor	8.8100e-003	0.2935	0.0930	9.3000e-004	0.0242	1.7700e-003	0.0260	6.6400e-003	1.6900e-003	8.3300e-003		101.7135	101.7135	5.1700e-003	0.0161	106.6506
Worker	0.0963	0.0726	0.9409	2.5200e-003	0.2906	1.8600e-003	0.2925	0.0771	1.7100e-003	0.0788		256.1346	256.1346	7.4100e-003	6.9500e-003	258.3915
Total	0.3459	9.9481	3.0297	0.0384	1.3121	0.0746	1.3867	0.3571	0.0713	0.4284		4,183.2848	4,183.2848	0.2169	0.6301	4,376.4776

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					0.3735	0.0000	0.3735	0.0410	0.0000	0.0410			0.0000			0.0000
Off-Road	0.2947	3.1527	11.1605	0.0198		0.0325	0.0325		0.0325	0.0325	0.0000	1,914.0849	1,914.0849	0.6191		1,929.5613
Total	0.2947	3.1527	11.1605	0.0198	0.3735	0.0325	0.4061	0.0410	0.0325	0.0735	0.0000	1,914.0849	1,914.0849	0.6191		1,929.5613

Exide Preliminary Investigation Area for Parkways Cleanup (80 mg/kg goal) - Maximum - Los Angeles-South Coast County, Winter

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.3 Soil Import Landscaping - 2022

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.2408	9.5820	1.9958	0.0349	0.9973	0.0710	1.0683	0.2734	0.0679	0.3413		3,825.4367	3,825.4367	0.2044	0.6070	4,011.4355
Vendor	8.8100e-003	0.2935	0.0930	9.3000e-004	0.0242	1.7700e-003	0.0260	6.6400e-003	1.6900e-003	8.3300e-003		101.7135	101.7135	5.1700e-003	0.0161	106.6506
Worker	0.0963	0.0726	0.9409	2.5200e-003	0.2906	1.8600e-003	0.2925	0.0771	1.7100e-003	0.0788		256.1346	256.1346	7.4100e-003	6.9500e-003	258.3915
Total	0.3459	9.9481	3.0297	0.0384	1.3121	0.0746	1.3867	0.3571	0.0713	0.4284		4,183.2848	4,183.2848	0.2169	0.6301	4,376.4776

Exide Preliminary Investigation Area for Parkways Cleanup (80 mg/kg goal) - Maximum - Los Angeles-South Coast County, Winter

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Unmitigated	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000

4.2 Trip Summary Information

Land Use	Average Daily Trip Rate			Unmitigated	Mitigated
	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Other Non-Asphalt Surfaces	0.00	0.00	0.00		
Total	0.00	0.00	0.00		

4.3 Trip Type Information

Land Use	Miles			Trip %			Trip Purpose %		
	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Other Non-Asphalt Surfaces	16.60	8.40	6.90	0.00	0.00	0.00	0	0	0

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Other Non-Asphalt Surfaces	0.544785	0.062844	0.187478	0.127235	0.023089	0.006083	0.010475	0.008012	0.000925	0.000611	0.024394	0.000698	0.003374

Exide Preliminary Investigation Area for Parkways Cleanup (80 mg/kg goal) - Maximum - Los Angeles-South Coast County, Winter

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
NaturalGas Mitigated	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
NaturalGas Unmitigated	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000

5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
Other Non-Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Total		0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000

Exide Preliminary Investigation Area for Parkways Cleanup (80 mg/kg goal) - Maximum - Los Angeles-South Coast County, Winter

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

5.2 Energy by Land Use - NaturalGas

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
Other Non-Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Total		0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000

6.0 Area Detail

6.1 Mitigation Measures Area

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	1.8700e-003	0.0000	5.2000e-004	0.0000		0.0000	0.0000		0.0000	0.0000		1.1200e-003	1.1200e-003	0.0000		1.2000e-003
Unmitigated	1.8700e-003	0.0000	5.2000e-004	0.0000		0.0000	0.0000		0.0000	0.0000		1.1200e-003	1.1200e-003	0.0000		1.2000e-003

Exide Preliminary Investigation Area for Parkways Cleanup (80 mg/kg goal) - Maximum - Los Angeles-South Coast County, Winter

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	1.8200e-003					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Landscaping	5.0000e-005	0.0000	5.2000e-004	0.0000		0.0000	0.0000		0.0000	0.0000		1.1200e-003	1.1200e-003	0.0000		1.2000e-003
Total	1.8700e-003	0.0000	5.2000e-004	0.0000		0.0000	0.0000		0.0000	0.0000		1.1200e-003	1.1200e-003	0.0000		1.2000e-003

Exide Preliminary Investigation Area for Parkways Cleanup (80 mg/kg goal) - Maximum - Los Angeles-South Coast County, Winter

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

6.2 Area by SubCategory

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	1.8200e-003					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Landscaping	5.0000e-005	0.0000	5.2000e-004	0.0000		0.0000	0.0000		0.0000	0.0000		1.1200e-003	1.1200e-003	0.0000		1.2000e-003
Total	1.8700e-003	0.0000	5.2000e-004	0.0000		0.0000	0.0000		0.0000	0.0000		1.1200e-003	1.1200e-003	0.0000		1.2000e-003

7.0 Water Detail

7.1 Mitigation Measures Water

Exide Preliminary Investigation Area for Parkways Cleanup (80 mg/kg goal) - Maximum - Los Angeles-South Coast County, Winter

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

8.0 Waste Detail

8.1 Mitigation Measures Waste

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type
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10.0 Stationary Equipment

Fire Pumps and Emergency Generators

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type
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Boilers

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type
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User Defined Equipment

Equipment Type	Number
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11.0 Vegetation

Exide Preliminary Investigation Area for Parkways Cleanup (80 mg/kg goal) - Average - Los Angeles-South Coast County, Winter

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

Exide Preliminary Investigation Area for Parkways Cleanup (80 mg/kg goal) - Average

Los Angeles-South Coast County, Winter

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Other Non-Asphalt Surfaces	0.76	1000sqft	0.02	764.55	0

1.2 Other Project Characteristics

Urbanization	Urban	Wind Speed (m/s)	2.2	Precipitation Freq (Days)	33
Climate Zone	9			Operational Year	2023
Utility Company	Southern California Edison				
CO2 Intensity (lb/MWhr)	390.98	CH4 Intensity (lb/MWhr)	0.033	N2O Intensity (lb/MWhr)	0.004

1.3 User Entered Comments & Non-Default Data

Project Characteristics - Cleanup activities only (no operations) - based on average values

Land Use - Based on an average size of 191.14 sq. ft. per parkway (4 parkways per day)

Construction Phase - Based on anticipated schedule of 1-2 days per clean up site.

Off-road Equipment - Clean up specific equipment - assumes 2 parkways per equipment set - 4 parkways per day.

Off-road Equipment - Clean up specific equipment - assumes 2 parkways per equipment set - 4 parkways per day.

Grading - Export based on average material export of 4.65 CY per site, 4 sites per day. Assumes average of 6.2 CY of soil import per site, 4 sites per day.

Trips and VMT - Worker trips assumes 6 LDAs + 6 LDTs + 1 visitor per day; Vendor trips assumes 1 water truck and 1 mobile refueler - HHDT; Haul truck trips based on 17CY truck capacity. Haul truck trip lengths consistent with EIR analysis.

Area Coating - No operational emissions.

Construction Off-road Equipment Mitigation - Assumes implementation of PDFs of requiring Tier 4 Final for equipment >50hp and implementation of SCAQMD fugitive dust control requirements.

Exide Preliminary Investigation Area for Parkways Cleanup (80 mg/kg goal) - Average - Los Angeles-South Coast County, Winter

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

Table Name	Column Name	Default Value	New Value
tblAreaCoating	Area_Parking	46	0
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	2.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	4.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	4.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	4.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	2.00
tblConstEquipMitigation	Tier	No Change	Tier 4 Final
tblConstEquipMitigation	Tier	No Change	Tier 4 Final
tblConstEquipMitigation	Tier	No Change	Tier 4 Final
tblConstEquipMitigation	Tier	No Change	Tier 4 Final
tblConstEquipMitigation	Tier	No Change	Tier 4 Final
tblConstructionPhase	NumDays	2.00	1.00
tblConstructionPhase	NumDays	2.00	1.00
tblConstructionPhase	PhaseEndDate	4/20/2022	4/4/2022
tblConstructionPhase	PhaseStartDate	4/19/2022	4/4/2022
tblGrading	AcresOfGrading	0.00	1.50
tblGrading	AcresOfGrading	0.00	0.75
tblGrading	MaterialExported	0.00	19.00
tblGrading	MaterialImported	0.00	25.00
tblOffRoadEquipment	OffRoadEquipmentType		Rubber Tired Loaders
tblOffRoadEquipment	OffRoadEquipmentType		Forklifts
tblOffRoadEquipment	OffRoadEquipmentType		Excavators
tblOffRoadEquipment	OffRoadEquipmentType		Skid Steer Loaders
tblOffRoadEquipment	OffRoadEquipmentType		Rubber Tired Loaders
tblOffRoadEquipment	OffRoadEquipmentType		Skid Steer Loaders
tblOffRoadEquipment	OffRoadEquipmentType		Forklifts
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	0.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	0.00

Exide Preliminary Investigation Area for Parkways Cleanup (80 mg/kg goal) - Average - Los Angeles-South Coast County, Winter

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	2.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	0.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	0.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	0.00
tblOffRoadEquipment	UsageHours	6.00	0.00
tblOffRoadEquipment	UsageHours	6.00	0.00
tblOffRoadEquipment	UsageHours	7.00	8.00
tblOffRoadEquipment	UsageHours	6.00	0.00
tblOffRoadEquipment	UsageHours	6.00	0.00
tblOffRoadEquipment	UsageHours	7.00	0.00
tblTripsAndVMT	HaulingTripLength	20.00	50.00
tblTripsAndVMT	HaulingTripLength	20.00	30.00
tblTripsAndVMT	HaulingTripNumber	2.00	4.00
tblTripsAndVMT	HaulingTripNumber	3.00	4.00
tblTripsAndVMT	VendorTripNumber	0.00	4.00
tblTripsAndVMT	VendorTripNumber	0.00	4.00
tblTripsAndVMT	VendorVehicleClass	HDT_Mix	HHDT
tblTripsAndVMT	VendorVehicleClass	HDT_Mix	HHDT
tblTripsAndVMT	WorkerTripNumber	25.00	26.00
tblTripsAndVMT	WorkerTripNumber	15.00	26.00

2.0 Emissions Summary

Exide Preliminary Investigation Area for Parkways Cleanup (80 mg/kg goal) - Average - Los Angeles-South Coast County, Winter

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	2.8000e-004	0.0000	8.0000e-005	0.0000		0.0000	0.0000		0.0000	0.0000		1.7000e-004	1.7000e-004	0.0000		1.8000e-004
Energy	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Mobile	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Total	2.8000e-004	0.0000	8.0000e-005	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		1.7000e-004	1.7000e-004	0.0000	0.0000	1.8000e-004

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	2.8000e-004	0.0000	8.0000e-005	0.0000		0.0000	0.0000		0.0000	0.0000		1.7000e-004	1.7000e-004	0.0000		1.8000e-004
Energy	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Mobile	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Total	2.8000e-004	0.0000	8.0000e-005	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		1.7000e-004	1.7000e-004	0.0000	0.0000	1.8000e-004

Exide Preliminary Investigation Area for Parkways Cleanup (80 mg/kg goal) - Average - Los Angeles-South Coast County, Winter

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Clearing Grubbing Soil Excavation	Grading	4/4/2022	4/4/2022	5	1	
2	Soil Import Landscaping	Grading	4/5/2022	4/5/2022	5	1	

Acres of Grading (Site Preparation Phase): 0

Acres of Grading (Grading Phase): 1.5

Acres of Paving: 0.02

Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 0; Non-Residential Outdoor: 0; Striped Parking Area: 0 (Architectural Coating – sqft)

OffRoad Equipment

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Soil Import Landscaping	Graders	0	0.00	187	0.41
Soil Import Landscaping	Rubber Tired Dozers	0	0.00	247	0.40
Soil Import Landscaping	Tractors/Loaders/Backhoes	0	0.00	97	0.37
Clearing Grubbing Soil Excavation	Rubber Tired Loaders	2	8.00	203	0.36
Clearing Grubbing Soil Excavation	Forklifts	2	8.00	89	0.20
Clearing Grubbing Soil Excavation	Graders	0	0.00	187	0.41
Clearing Grubbing Soil Excavation	Excavators	2	8.00	158	0.38
Clearing Grubbing Soil Excavation	Skid Steer Loaders	2	8.00	65	0.37
Soil Import Landscaping	Rubber Tired Loaders	2	8.00	203	0.36

Exide Preliminary Investigation Area for Parkways Cleanup (80 mg/kg goal) - Average - Los Angeles-South Coast County, Winter

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

Soil Import Landscaping	Skid Steer Loaders	2	8.00	65	0.37
Clearing Grubbing Soil Excavation	Rubber Tired Dozers	0	0.00	247	0.40
Soil Import Landscaping	Forklifts	2	8.00	89	0.20
Clearing Grubbing Soil Excavation	Tractors/Loaders/Backhoes	2	8.00	97	0.37

Trips and VMT

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Soil Import Landscaping	6	26.00	4.00	4.00	14.70	6.90	30.00	LD_Mix	HHDT	HHDT
Clearing Grubbing Soil Excavation	10	26.00	4.00	4.00	14.70	6.90	50.00	LD_Mix	HHDT	HHDT

3.1 Mitigation Measures Construction

Use Cleaner Engines for Construction Equipment

Water Exposed Area

3.2 Clearing Grubbing Soil Excavation - 2022

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					1.5929	0.0000	1.5929	0.1721	0.0000	0.1721			0.0000			0.0000
Off-Road	1.6834	16.9222	19.1305	0.0363		0.7638	0.7638		0.7027	0.7027		3,510.6812	3,510.6812	1.1354		3,539.0669
Total	1.6834	16.9222	19.1305	0.0363	1.5929	0.7638	2.3567	0.1721	0.7027	0.8748		3,510.6812	3,510.6812	1.1354		3,539.0669

Exide Preliminary Investigation Area for Parkways Cleanup (80 mg/kg goal) - Average - Los Angeles-South Coast County, Winter

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.2 Clearing Grubbing Soil Excavation - 2022

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0397	1.6278	0.3115	6.0500e-003	0.1749	0.0124	0.1873	0.0479	0.0119	0.0598		663.2525	663.2525	0.0357	0.1053	695.5081
Vendor	8.8100e-003	0.2935	0.0930	9.3000e-004	0.0242	1.7700e-003	0.0260	6.6400e-003	1.6900e-003	8.3300e-003		101.7135	101.7135	5.1700e-003	0.0161	106.6506
Worker	0.0963	0.0726	0.9409	2.5200e-003	0.2906	1.8600e-003	0.2925	0.0771	1.7100e-003	0.0788		256.1346	256.1346	7.4100e-003	6.9500e-003	258.3915
Total	0.1448	1.9939	1.3453	9.5000e-003	0.4897	0.0160	0.5058	0.1317	0.0153	0.1469		1,021.1006	1,021.1006	0.0482	0.1283	1,060.5502

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					0.7168	0.0000	0.7168	0.0774	0.0000	0.0774			0.0000			0.0000
Off-Road	0.4972	4.0377	23.6534	0.0363		0.0595	0.0595		0.0595	0.0595	0.0000	3,510.6812	3,510.6812	1.1354		3,539.0669
Total	0.4972	4.0377	23.6534	0.0363	0.7168	0.0595	0.7763	0.0774	0.0595	0.1369	0.0000	3,510.6812	3,510.6812	1.1354		3,539.0669

Exide Preliminary Investigation Area for Parkways Cleanup (80 mg/kg goal) - Average - Los Angeles-South Coast County, Winter

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.2 Clearing Grubbing Soil Excavation - 2022

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0397	1.6278	0.3115	6.0500e-003	0.1749	0.0124	0.1873	0.0479	0.0119	0.0598		663.2525	663.2525	0.0357	0.1053	695.5081
Vendor	8.8100e-003	0.2935	0.0930	9.3000e-004	0.0242	1.7700e-003	0.0260	6.6400e-003	1.6900e-003	8.3300e-003		101.7135	101.7135	5.1700e-003	0.0161	106.6506
Worker	0.0963	0.0726	0.9409	2.5200e-003	0.2906	1.8600e-003	0.2925	0.0771	1.7100e-003	0.0788		256.1346	256.1346	7.4100e-003	6.9500e-003	258.3915
Total	0.1448	1.9939	1.3453	9.5000e-003	0.4897	0.0160	0.5058	0.1317	0.0153	0.1469		1,021.1006	1,021.1006	0.0482	0.1283	1,060.5502

3.3 Soil Import Landscaping - 2022

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					0.7982	0.0000	0.7982	0.0863	0.0000	0.0863			0.0000			0.0000
Off-Road	0.9492	10.0170	8.1443	0.0197		0.4117	0.4117		0.3788	0.3788		1,908.1728	1,908.1728	0.6171		1,923.6013
Total	0.9492	10.0170	8.1443	0.0197	0.7982	0.4117	1.2099	0.0863	0.3788	0.4651		1,908.1728	1,908.1728	0.6171		1,923.6013

Exide Preliminary Investigation Area for Parkways Cleanup (80 mg/kg goal) - Average - Los Angeles-South Coast County, Winter

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.3 Soil Import Landscaping - 2022

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0254	1.0086	0.2101	3.6700e-003	0.1050	7.4700e-003	0.1125	0.0288	7.1500e-003	0.0359		402.6776	402.6776	0.0215	0.0639	422.2564
Vendor	8.8100e-003	0.2935	0.0930	9.3000e-004	0.0242	1.7700e-003	0.0260	6.6400e-003	1.6900e-003	8.3300e-003		101.7135	101.7135	5.1700e-003	0.0161	106.6506
Worker	0.0963	0.0726	0.9409	2.5200e-003	0.2906	1.8600e-003	0.2925	0.0771	1.7100e-003	0.0788		256.1346	256.1346	7.4100e-003	6.9500e-003	258.3915
Total	0.1305	1.3747	1.2439	7.1200e-003	0.4198	0.0111	0.4309	0.1125	0.0106	0.1230		760.5256	760.5256	0.0341	0.0870	787.2985

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					0.3592	0.0000	0.3592	0.0388	0.0000	0.0388			0.0000			0.0000
Off-Road	0.2941	3.1579	11.1332	0.0197		0.0324	0.0324		0.0324	0.0324	0.0000	1,908.1728	1,908.1728	0.6171		1,923.6013
Total	0.2941	3.1579	11.1332	0.0197	0.3592	0.0324	0.3916	0.0388	0.0324	0.0713	0.0000	1,908.1728	1,908.1728	0.6171		1,923.6013

Exide Preliminary Investigation Area for Parkways Cleanup (80 mg/kg goal) - Average - Los Angeles-South Coast County, Winter

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.3 Soil Import Landscaping - 2022

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0254	1.0086	0.2101	3.6700e-003	0.1050	7.4700e-003	0.1125	0.0288	7.1500e-003	0.0359		402.6776	402.6776	0.0215	0.0639	422.2564
Vendor	8.8100e-003	0.2935	0.0930	9.3000e-004	0.0242	1.7700e-003	0.0260	6.6400e-003	1.6900e-003	8.3300e-003		101.7135	101.7135	5.1700e-003	0.0161	106.6506
Worker	0.0963	0.0726	0.9409	2.5200e-003	0.2906	1.8600e-003	0.2925	0.0771	1.7100e-003	0.0788		256.1346	256.1346	7.4100e-003	6.9500e-003	258.3915
Total	0.1305	1.3747	1.2439	7.1200e-003	0.4198	0.0111	0.4309	0.1125	0.0106	0.1230		760.5256	760.5256	0.0341	0.0870	787.2985

Exide Preliminary Investigation Area for Parkways Cleanup (80 mg/kg goal) - Average - Los Angeles-South Coast County, Winter

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Unmitigated	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000

4.2 Trip Summary Information

Land Use	Average Daily Trip Rate			Unmitigated	Mitigated
	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Other Non-Asphalt Surfaces	0.00	0.00	0.00		
Total	0.00	0.00	0.00		

4.3 Trip Type Information

Land Use	Miles			Trip %			Trip Purpose %		
	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Other Non-Asphalt Surfaces	16.60	8.40	6.90	0.00	0.00	0.00	0	0	0

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Other Non-Asphalt Surfaces	0.544785	0.062844	0.187478	0.127235	0.023089	0.006083	0.010475	0.008012	0.000925	0.000611	0.024394	0.000698	0.003374

Exide Preliminary Investigation Area for Parkways Cleanup (80 mg/kg goal) - Average - Los Angeles-South Coast County, Winter

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
NaturalGas Mitigated	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
NaturalGas Unmitigated	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000

5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
Other Non-Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Total		0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000

Exide Preliminary Investigation Area for Parkways Cleanup (80 mg/kg goal) - Average - Los Angeles-South Coast County, Winter

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

5.2 Energy by Land Use - NaturalGas

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
Other Non-Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Total		0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000

6.0 Area Detail

6.1 Mitigation Measures Area

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	2.8000e-004	0.0000	8.0000e-005	0.0000		0.0000	0.0000		0.0000	0.0000		1.7000e-004	1.7000e-004	0.0000		1.8000e-004
Unmitigated	2.8000e-004	0.0000	8.0000e-005	0.0000		0.0000	0.0000		0.0000	0.0000		1.7000e-004	1.7000e-004	0.0000		1.8000e-004

Exide Preliminary Investigation Area for Parkways Cleanup (80 mg/kg goal) - Average - Los Angeles-South Coast County, Winter

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	2.7000e-004					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Landscaping	1.0000e-005	0.0000	8.0000e-005	0.0000		0.0000	0.0000		0.0000	0.0000		1.7000e-004	1.7000e-004	0.0000		1.8000e-004
Total	2.8000e-004	0.0000	8.0000e-005	0.0000		0.0000	0.0000		0.0000	0.0000		1.7000e-004	1.7000e-004	0.0000		1.8000e-004

Exide Preliminary Investigation Area for Parkways Cleanup (80 mg/kg goal) - Average - Los Angeles-South Coast County, Winter

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

6.2 Area by SubCategory

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	2.7000e-004					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Landscaping	1.0000e-005	0.0000	8.0000e-005	0.0000		0.0000	0.0000		0.0000	0.0000		1.7000e-004	1.7000e-004	0.0000		1.8000e-004
Total	2.8000e-004	0.0000	8.0000e-005	0.0000		0.0000	0.0000		0.0000	0.0000		1.7000e-004	1.7000e-004	0.0000		1.8000e-004

7.0 Water Detail

7.1 Mitigation Measures Water

Exide Preliminary Investigation Area for Parkways Cleanup (80 mg/kg goal) - Average - Los Angeles-South Coast County, Winter

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

8.0 Waste Detail

8.1 Mitigation Measures Waste

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type
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10.0 Stationary Equipment

Fire Pumps and Emergency Generators

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type
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Boilers

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type
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User Defined Equipment

Equipment Type	Number
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11.0 Vegetation

Exide Preliminary Investigation Area for Parkways Cleanup (80 mg/kg goal) - Average - Los Angeles-South Coast County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

Exide Preliminary Investigation Area for Parkways Cleanup (80 mg/kg goal) - Average

Los Angeles-South Coast County, Annual

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Other Non-Asphalt Surfaces	0.76	1000sqft	0.02	764.55	0

1.2 Other Project Characteristics

Urbanization	Urban	Wind Speed (m/s)	2.2	Precipitation Freq (Days)	33
Climate Zone	9			Operational Year	2023
Utility Company	Southern California Edison				
CO2 Intensity (lb/MW hr)	390.98	CH4 Intensity (lb/MW hr)	0.033	N2O Intensity (lb/MW hr)	0.004

1.3 User Entered Comments & Non-Default Data

Project Characteristics - Cleanup activities only (no operations) - based on average values

Land Use - Based on an average size of 191.14 sq. ft. per parkway (4 parkways per day)

Construction Phase - Based on anticipated schedule of 1-2 days per clean up site.

Off-road Equipment - Clean up specific equipment - assumes 2 parkways per equipment set - 4 parkways per day.

Off-road Equipment - Clean up specific equipment - assumes 2 parkways per equipment set - 4 parkways per day.

Grading - Export based on average material export of 4.65 CY per site, 4 sites per day. Assumes average of 6.2 CY of soil import per site, 4 sites per day.

Trips and VMT - Worker trips assumes 6 LDAs + 6 LDTs + 1 visitor per day; Vendor trips assumes 1 water truck and 1 mobile refueler - HHDT; Haul truck trips based on 17CY truck capacity. Haul truck trip lengths consistent with EIR analysis.

Area Coating - No operational emissions.

Construction Off-road Equipment Mitigation - Assumes implementation of PDFs of requiring Tier 4 Final for equipment >50hp and implementation of SCAQMD fugitive dust control requirements.

Exide Preliminary Investigation Area for Parkways Cleanup (80 mg/kg goal) - Average - Los Angeles-South Coast County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

Table Name	Column Name	Default Value	New Value
tblAreaCoating	Area_Parking	46	0
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	2.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	4.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	4.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	4.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	2.00
tblConstEquipMitigation	Tier	No Change	Tier 4 Final
tblConstEquipMitigation	Tier	No Change	Tier 4 Final
tblConstEquipMitigation	Tier	No Change	Tier 4 Final
tblConstEquipMitigation	Tier	No Change	Tier 4 Final
tblConstEquipMitigation	Tier	No Change	Tier 4 Final
tblConstructionPhase	NumDays	2.00	1.00
tblConstructionPhase	NumDays	2.00	1.00
tblConstructionPhase	PhaseEndDate	4/20/2022	4/4/2022
tblConstructionPhase	PhaseStartDate	4/19/2022	4/4/2022
tblGrading	AcresOfGrading	0.00	1.50
tblGrading	AcresOfGrading	0.00	0.75
tblGrading	MaterialExported	0.00	19.00
tblGrading	MaterialImported	0.00	25.00
tblOffRoadEquipment	OffRoadEquipmentType		Rubber Tired Loaders
tblOffRoadEquipment	OffRoadEquipmentType		Forklifts
tblOffRoadEquipment	OffRoadEquipmentType		Excavators
tblOffRoadEquipment	OffRoadEquipmentType		Skid Steer Loaders
tblOffRoadEquipment	OffRoadEquipmentType		Rubber Tired Loaders
tblOffRoadEquipment	OffRoadEquipmentType		Skid Steer Loaders
tblOffRoadEquipment	OffRoadEquipmentType		Forklifts
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	0.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	0.00

Exide Preliminary Investigation Area for Parkways Cleanup (80 mg/kg goal) - Average - Los Angeles-South Coast County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	2.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	0.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	0.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	0.00
tblOffRoadEquipment	UsageHours	6.00	0.00
tblOffRoadEquipment	UsageHours	6.00	0.00
tblOffRoadEquipment	UsageHours	7.00	8.00
tblOffRoadEquipment	UsageHours	6.00	0.00
tblOffRoadEquipment	UsageHours	6.00	0.00
tblOffRoadEquipment	UsageHours	7.00	0.00
tblTripsAndVMT	HaulingTripLength	20.00	50.00
tblTripsAndVMT	HaulingTripLength	20.00	30.00
tblTripsAndVMT	HaulingTripNumber	2.00	4.00
tblTripsAndVMT	HaulingTripNumber	3.00	4.00
tblTripsAndVMT	VendorTripNumber	0.00	4.00
tblTripsAndVMT	VendorTripNumber	0.00	4.00
tblTripsAndVMT	VendorVehicleClass	HDT_Mix	HHDT
tblTripsAndVMT	VendorVehicleClass	HDT_Mix	HHDT
tblTripsAndVMT	WorkerTripNumber	25.00	26.00
tblTripsAndVMT	WorkerTripNumber	15.00	26.00

2.0 Emissions Summary

Exide Preliminary Investigation Area for Parkways Cleanup (80 mg/kg goal) - Average - Los Angeles-South Coast County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

Quarter	Start Date	End Date	Maximum Unmitigated ROG + NOX (tons/quarter)	Maximum Mitigated ROG + NOX (tons/quarter)
1	4-4-2022	7-3-2022	0.0118	0.0041
		Highest	0.0118	0.0041

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	5.0000e-005	0.0000	1.0000e-005	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	2.0000e-005	2.0000e-005	0.0000	0.0000	2.0000e-005
Energy	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Mobile	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Waste						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Water						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	5.0000e-005	0.0000	1.0000e-005	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	2.0000e-005	2.0000e-005	0.0000	0.0000	2.0000e-005

Exide Preliminary Investigation Area for Parkways Cleanup (80 mg/kg goal) - Average - Los Angeles-South Coast County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

2.2 Overall Operational

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	5.0000e-005	0.0000	1.0000e-005	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	2.0000e-005	2.0000e-005	0.0000	0.0000	2.0000e-005
Energy	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Mobile	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Waste						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Water						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	5.0000e-005	0.0000	1.0000e-005	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	2.0000e-005	2.0000e-005	0.0000	0.0000	2.0000e-005

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Clearing Grubbing Soil Excavation	Grading	4/4/2022	4/4/2022	5	1	
2	Soil Import Landscaping	Grading	4/5/2022	4/5/2022	5	1	

Exide Preliminary Investigation Area for Parkways Cleanup (80 mg/kg goal) - Average - Los Angeles-South Coast County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

Acres of Grading (Site Preparation Phase): 0

Acres of Grading (Grading Phase): 1.5

Acres of Paving: 0.02

Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 0; Non-Residential Outdoor: 0; Striped Parking Area: 0 (Architectural Coating – sqft)

OffRoad Equipment

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Soil Import Landscaping	Graders	0	0.00	187	0.41
Soil Import Landscaping	Rubber Tired Dozers	0	0.00	247	0.40
Soil Import Landscaping	Tractors/Loaders/Backhoes	0	0.00	97	0.37
Clearing Grubbing Soil Excavation	Rubber Tired Loaders	2	8.00	203	0.36
Clearing Grubbing Soil Excavation	Forklifts	2	8.00	89	0.20
Clearing Grubbing Soil Excavation	Graders	0	0.00	187	0.41
Clearing Grubbing Soil Excavation	Excavators	2	8.00	158	0.38
Clearing Grubbing Soil Excavation	Skid Steer Loaders	2	8.00	65	0.37
Soil Import Landscaping	Rubber Tired Loaders	2	8.00	203	0.36
Soil Import Landscaping	Skid Steer Loaders	2	8.00	65	0.37
Clearing Grubbing Soil Excavation	Rubber Tired Dozers	0	0.00	247	0.40
Soil Import Landscaping	Forklifts	2	8.00	89	0.20
Clearing Grubbing Soil Excavation	Tractors/Loaders/Backhoes	2	8.00	97	0.37

Trips and VMT

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Soil Import Landscaping	6	26.00	4.00	4.00	14.70	6.90	30.00	LD_Mix	HHDT	HHDT
Clearing Grubbing Soil Excavation	10	26.00	4.00	4.00	14.70	6.90	50.00	LD_Mix	HHDT	HHDT

3.1 Mitigation Measures Construction

Exide Preliminary Investigation Area for Parkways Cleanup (80 mg/kg goal) - Average - Los Angeles-South Coast County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

Use Cleaner Engines for Construction Equipment

Water Exposed Area

3.2 Clearing Grubbing Soil Excavation - 2022

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					8.0000e-004	0.0000	8.0000e-004	9.0000e-005	0.0000	9.0000e-005	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	8.4000e-004	8.4600e-003	9.5700e-003	2.0000e-005		3.8000e-004	3.8000e-004		3.5000e-004	3.5000e-004	0.0000	1.5924	1.5924	5.2000e-004	0.0000	1.6053
Total	8.4000e-004	8.4600e-003	9.5700e-003	2.0000e-005	8.0000e-004	3.8000e-004	1.1800e-003	9.0000e-005	3.5000e-004	4.4000e-004	0.0000	1.5924	1.5924	5.2000e-004	0.0000	1.6053

Exide Preliminary Investigation Area for Parkways Cleanup (80 mg/kg goal) - Average - Los Angeles-South Coast County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.2 Clearing Grubbing Soil Excavation - 2022

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	2.0000e-005	8.3000e-004	1.5000e-004	0.0000	9.0000e-005	1.0000e-005	9.0000e-005	2.0000e-005	1.0000e-005	3.0000e-005	0.0000	0.3008	0.3008	2.0000e-005	5.0000e-005	0.3155
Vendor	0.0000	1.5000e-004	5.0000e-005	0.0000	1.0000e-005	0.0000	1.0000e-005	0.0000	0.0000	0.0000	0.0000	0.0461	0.0461	0.0000	1.0000e-005	0.0484
Worker	4.0000e-005	4.0000e-005	4.8000e-004	0.0000	1.4000e-004	0.0000	1.4000e-004	4.0000e-005	0.0000	4.0000e-005	0.0000	0.1179	0.1179	0.0000	0.0000	0.1190
Total	6.0000e-005	1.0200e-003	6.8000e-004	0.0000	2.4000e-004	1.0000e-005	2.4000e-004	6.0000e-005	1.0000e-005	7.0000e-005	0.0000	0.4649	0.4649	2.0000e-005	6.0000e-005	0.4828

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					3.6000e-004	0.0000	3.6000e-004	4.0000e-005	0.0000	4.0000e-005	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	2.5000e-004	2.0200e-003	0.0118	2.0000e-005		3.0000e-005	3.0000e-005		3.0000e-005	3.0000e-005	0.0000	1.5924	1.5924	5.2000e-004	0.0000	1.6053
Total	2.5000e-004	2.0200e-003	0.0118	2.0000e-005	3.6000e-004	3.0000e-005	3.9000e-004	4.0000e-005	3.0000e-005	7.0000e-005	0.0000	1.5924	1.5924	5.2000e-004	0.0000	1.6053

Exide Preliminary Investigation Area for Parkways Cleanup (80 mg/kg goal) - Average - Los Angeles-South Coast County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.2 Clearing Grubbing Soil Excavation - 2022

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	2.0000e-005	8.3000e-004	1.5000e-004	0.0000	9.0000e-005	1.0000e-005	9.0000e-005	2.0000e-005	1.0000e-005	3.0000e-005	0.0000	0.3008	0.3008	2.0000e-005	5.0000e-005	0.3155
Vendor	0.0000	1.5000e-004	5.0000e-005	0.0000	1.0000e-005	0.0000	1.0000e-005	0.0000	0.0000	0.0000	0.0000	0.0461	0.0461	0.0000	1.0000e-005	0.0484
Worker	4.0000e-005	4.0000e-005	4.8000e-004	0.0000	1.4000e-004	0.0000	1.4000e-004	4.0000e-005	0.0000	4.0000e-005	0.0000	0.1179	0.1179	0.0000	0.0000	0.1190
Total	6.0000e-005	1.0200e-003	6.8000e-004	0.0000	2.4000e-004	1.0000e-005	2.4000e-004	6.0000e-005	1.0000e-005	7.0000e-005	0.0000	0.4649	0.4649	2.0000e-005	6.0000e-005	0.4828

3.3 Soil Import Landscaping - 2022

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					4.0000e-004	0.0000	4.0000e-004	4.0000e-005	0.0000	4.0000e-005	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	4.7000e-004	5.0100e-003	4.0700e-003	1.0000e-005		2.1000e-004	2.1000e-004		1.9000e-004	1.9000e-004	0.0000	0.8655	0.8655	2.8000e-004	0.0000	0.8725
Total	4.7000e-004	5.0100e-003	4.0700e-003	1.0000e-005	4.0000e-004	2.1000e-004	6.1000e-004	4.0000e-005	1.9000e-004	2.3000e-004	0.0000	0.8655	0.8655	2.8000e-004	0.0000	0.8725

Exide Preliminary Investigation Area for Parkways Cleanup (80 mg/kg goal) - Average - Los Angeles-South Coast County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.3 Soil Import Landscaping - 2022

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	1.0000e-005	5.1000e-004	1.0000e-004	0.0000	5.0000e-005	0.0000	6.0000e-005	1.0000e-005	0.0000	2.0000e-005	0.0000	0.1826	0.1826	1.0000e-005	3.0000e-005	0.1915
Vendor	0.0000	1.5000e-004	5.0000e-005	0.0000	1.0000e-005	0.0000	1.0000e-005	0.0000	0.0000	0.0000	0.0000	0.0461	0.0461	0.0000	1.0000e-005	0.0484
Worker	4.0000e-005	4.0000e-005	4.8000e-004	0.0000	1.4000e-004	0.0000	1.4000e-004	4.0000e-005	0.0000	4.0000e-005	0.0000	0.1179	0.1179	0.0000	0.0000	0.1190
Total	5.0000e-005	7.0000e-004	6.3000e-004	0.0000	2.0000e-004	0.0000	2.1000e-004	5.0000e-005	0.0000	6.0000e-005	0.0000	0.3467	0.3467	1.0000e-005	4.0000e-005	0.3588

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					1.8000e-004	0.0000	1.8000e-004	2.0000e-005	0.0000	2.0000e-005	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	1.5000e-004	1.5800e-003	5.5700e-003	1.0000e-005		2.0000e-005	2.0000e-005		2.0000e-005	2.0000e-005	0.0000	0.8655	0.8655	2.8000e-004	0.0000	0.8725
Total	1.5000e-004	1.5800e-003	5.5700e-003	1.0000e-005	1.8000e-004	2.0000e-005	2.0000e-004	2.0000e-005	2.0000e-005	4.0000e-005	0.0000	0.8655	0.8655	2.8000e-004	0.0000	0.8725

Exide Preliminary Investigation Area for Parkways Cleanup (80 mg/kg goal) - Average - Los Angeles-South Coast County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.3 Soil Import Landscaping - 2022

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	1.0000e-005	5.1000e-004	1.0000e-004	0.0000	5.0000e-005	0.0000	6.0000e-005	1.0000e-005	0.0000	2.0000e-005	0.0000	0.1826	0.1826	1.0000e-005	3.0000e-005	0.1915
Vendor	0.0000	1.5000e-004	5.0000e-005	0.0000	1.0000e-005	0.0000	1.0000e-005	0.0000	0.0000	0.0000	0.0000	0.0461	0.0461	0.0000	1.0000e-005	0.0484
Worker	4.0000e-005	4.0000e-005	4.8000e-004	0.0000	1.4000e-004	0.0000	1.4000e-004	4.0000e-005	0.0000	4.0000e-005	0.0000	0.1179	0.1179	0.0000	0.0000	0.1190
Total	5.0000e-005	7.0000e-004	6.3000e-004	0.0000	2.0000e-004	0.0000	2.1000e-004	5.0000e-005	0.0000	6.0000e-005	0.0000	0.3467	0.3467	1.0000e-005	4.0000e-005	0.3588

Exide Preliminary Investigation Area for Parkways Cleanup (80 mg/kg goal) - Average - Los Angeles-South Coast County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Unmitigated	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000

4.2 Trip Summary Information

Land Use	Average Daily Trip Rate			Unmitigated	Mitigated
	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Other Non-Asphalt Surfaces	0.00	0.00	0.00		
Total	0.00	0.00	0.00		

4.3 Trip Type Information

Land Use	Miles			Trip %			Trip Purpose %		
	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Other Non-Asphalt Surfaces	16.60	8.40	6.90	0.00	0.00	0.00	0	0	0

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Other Non-Asphalt Surfaces	0.544785	0.062844	0.187478	0.127235	0.023089	0.006083	0.010475	0.008012	0.000925	0.000611	0.024394	0.000698	0.003374

Exide Preliminary Investigation Area for Parkways Cleanup (80 mg/kg goal) - Average - Los Angeles-South Coast County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Electricity Mitigated						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Electricity Unmitigated						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
NaturalGas Mitigated	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
NaturalGas Unmitigated	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000

Exide Preliminary Investigation Area for Parkways Cleanup (80 mg/kg goal) - Average - Los Angeles-South Coast County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

5.3 Energy by Land Use - Electricity

Unmitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Other Non-Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000
Total		0.0000	0.0000	0.0000	0.0000

Mitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Other Non-Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000
Total		0.0000	0.0000	0.0000	0.0000

6.0 Area Detail

6.1 Mitigation Measures Area

Exide Preliminary Investigation Area for Parkways Cleanup (80 mg/kg goal) - Average - Los Angeles-South Coast County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	5.0000e-005	0.0000	1.0000e-005	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	2.0000e-005	2.0000e-005	0.0000	0.0000	2.0000e-005
Unmitigated	5.0000e-005	0.0000	1.0000e-005	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	2.0000e-005	2.0000e-005	0.0000	0.0000	2.0000e-005

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	5.0000e-005					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	0.0000	0.0000	1.0000e-005	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	2.0000e-005	2.0000e-005	0.0000	0.0000	2.0000e-005
Total	5.0000e-005	0.0000	1.0000e-005	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	2.0000e-005	2.0000e-005	0.0000	0.0000	2.0000e-005

Exide Preliminary Investigation Area for Parkways Cleanup (80 mg/kg goal) - Average - Los Angeles-South Coast County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

6.2 Area by SubCategory

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	5.0000e-005					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	0.0000	0.0000	1.0000e-005	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	2.0000e-005	2.0000e-005	0.0000	0.0000	2.0000e-005
Total	5.0000e-005	0.0000	1.0000e-005	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	2.0000e-005	2.0000e-005	0.0000	0.0000	2.0000e-005

7.0 Water Detail

7.1 Mitigation Measures Water

Exide Preliminary Investigation Area for Parkways Cleanup (80 mg/kg goal) - Average - Los Angeles-South Coast County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

	Total CO2	CH4	N2O	CO2e
Category	MT/yr			
Mitigated	0.0000	0.0000	0.0000	0.0000
Unmitigated	0.0000	0.0000	0.0000	0.0000

7.2 Water by Land Use

Unmitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
Other Non-Asphalt Surfaces	0 / 0	0.0000	0.0000	0.0000	0.0000
Total		0.0000	0.0000	0.0000	0.0000

Exide Preliminary Investigation Area for Parkways Cleanup (80 mg/kg goal) - Average - Los Angeles-South Coast County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

7.2 Water by Land Use

Mitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
Other Non-Asphalt Surfaces	0 / 0	0.0000	0.0000	0.0000	0.0000
Total		0.0000	0.0000	0.0000	0.0000

8.0 Waste Detail

8.1 Mitigation Measures Waste

Category/Year

	Total CO2	CH4	N2O	CO2e
	MT/yr			
Mitigated	0.0000	0.0000	0.0000	0.0000
Unmitigated	0.0000	0.0000	0.0000	0.0000

Exide Preliminary Investigation Area for Parkways Cleanup (80 mg/kg goal) - Average - Los Angeles-South Coast County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

8.2 Waste by Land Use

Unmitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
Other Non-Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000
Total		0.0000	0.0000	0.0000	0.0000

Mitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
Other Non-Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000
Total		0.0000	0.0000	0.0000	0.0000

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type
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Exide Preliminary Investigation Area for Parkways Cleanup (80 mg/kg goal) - Average - Los Angeles-South Coast County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

10.0 Stationary Equipment

Fire Pumps and Emergency Generators

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type
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Boilers

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type
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User Defined Equipment

Equipment Type	Number
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11.0 Vegetation

Appendix B
Technical Transportation Memorandum

Memorandum

To	Hiral Doshi, California Department of Toxic Substances Control
Subject	Technical Transportation Memorandum - Draft Addendum to the Final Removal Action (Cleanup) Plan - Offsite Properties within the Exide Preliminary Investigation Area Final Environmental Impact Report for Parkways Cleanup Goal 80 mg/kg
From	Nak Kim, Traffic Engineer, AECOM
Date	April 14, 2022

Overview

The former Exide Technologies, Inc. battery recycling facility (Exide Facility) is located at 2700 South Indiana Street, in the City of Vernon, California. The property has been used for a variety of metal fabrication and metal recovery operations since the 1920s. Exide acquired the property in 2000 and operated a battery recycling facility until 2014. A number of state and local environmental agencies regulated Exide's operations, including the Department of Toxic Substances Control (DTSC), the South Coast Air Quality Management District (SCAQMD), and the Los Angeles County Certified Unified Program Agency.

In 2013, DTSC ordered Exide to sample 39 residential properties in the northern and southern initial assessment areas (three [3] blocks each in East Los Angeles and Maywood, respectively). These areas are collectively referred to as the Initial Assessment Area. The Initial Assessment Area is the residential area where an air dispersion modeling study and health risk assessment, conducted by Exide for the SCAQMD, indicated that metal and other contaminants emitted by Exide's former operations were most likely to have deposited and created the greatest potential for harm. Sampling showed high levels of lead in soils at residential properties, leading DTSC to order Exide to sample and cleanup all 219 properties in the Initial Assessment Area.

DTSC's preliminary evaluation of subsequent soil sampling indicated that lead emissions from the former Exide Facility likely extend to a distance between 1.3 and 1.7 miles from the Exide Facility, with distances varying depending on wind direction. This area is referred to as the Preliminary Investigation Area or PIA. Based on information from the Los Angeles County Assessor's Office, the PIA is estimated to include about 10,000 residences and other sensitive land use properties, such as schools, daycares and parks. The PIA encompasses properties within the cities of Bell, Commerce, Huntington Park, Maywood, Los Angeles (Boyle Heights neighborhood), Vernon and the County of Los Angeles (East Los Angeles neighborhood).

DTSC estimated a cleanup rate of 25 to 70 properties in any one (1) week, and analyzed an average cleanup rate of 50 properties per week. DTSC took this approach for two reasons: 1) to provide a thorough and health protective analysis of the impacts of implementing the project; and 2) to allow DTSC to use the analysis in this document to support potential future cleanups if and when additional funding is authorized, which will allow such work to proceed more quickly. Cleanup is anticipated to be ongoing through 2025 with existing funding, where clean up is occurring at a rate of approximately 80 homes per month.¹

In 2016, an Environmental Impact Report (EIR) was prepared for the Final Removal Action Plan (Cleanup Plan) Offsite Properties within the Exide PIA Project (project). The Final EIR (hereafter referred to as the Exide Cleanup Plan EIR) was approved and certified in July 2017.

¹ Per DTSC's Exide Residential Cleanup webpage accessed on March 28, 2022, the latest cleanup progress reported during preparation of the Draft Addendum was 3,520 properties at a rate of about 80 homes a month. Source: DTSC. 2022. Exide Residential Cleanup Webpage. Available at: <https://dtsc.ca.gov/residential-cleanup/> (accessed March 28, 2022).

Proposed Modification to the Project

The proposed modification to the project evaluated in this technical memorandum includes the excavation and disposal procedures for soil containing lead, arsenic, antimony, cadmium, copper, and/or zinc in exceedance of their respective screening criteria (referred to as the "Parkways Cleanup Goal 80 mg/kg") as documented in the Revised Human Health Risk Assessment: Parkways in the Vicinity of the Exide Technologies Facility (herein referred to as the HHRA).

This modification to the project includes proposed cleanup of approximately 7,891 of a total of 10,301 parkways within the PIA based on the results of the HHRA. A parkway refers to an unpaved area, which generally lies between the sidewalk and the street in front of residential properties, schools, parks, daycare centers, and other sensitive land use parcels. Parkways vary in length, width, location relative to street and residence, and vary by many other features. For the purposes of this technical memorandum (to determine which parkways require cleanup), parkway decision units were established. Parkway decision units refer to the parkway or portion of a parkway for which a sample was collected to characterize the nature and extent of metals-impacted soil. Generally, sample locations were centered in the front of a parcel laterally. In some instances, multiple smaller parkways are present adjacent to target parkways (generally divided by driveways, walkways, or other obstructions). In these cases, one sample was collected to represent the several smaller parkways. In other instances, parkways may extend laterally for a longer distance without division from driveways, walkways, or other obstructions (such as parkways at schools and parks). In these instances, multiple sample locations spaced approximately 50 to 100 feet apart were selected to divide these into individual decision units. While parkways are adjacent to parcels, some parkways may be adjacent to a single parcel, multiple parkways may be adjacent to the same parcel, or a parkway may span across multiple adjacent parcels. The *Master Excavation, Disposal, and Restoration Design Plan: Parkways within the Exide Preliminary Investigation Area* (herein referred to as the *Master Excavation Plan*) presents the various project assets (parcels, parkways, parkway decision units, parkway cleanup groups, blocks, jurisdictions, etc.) in greater detail. Additionally, the *Master Excavation Plan* documents cleanup procedures for excavation, transportation, and disposal of lead- and metals-impacted soil, and describes procedures for backfill, compaction, and restoration of the parkways with clean soil and replacement landscaping as applicable.

Transportation Analysis

The Exide Cleanup Plan EIR indicated that the project would result in less than significant impacts related to transportation and traffic. The Exide Cleanup Plan EIR concluded the addition of construction truck vehicles onto the local street system would contribute to increased traffic in the project vicinity. The project would temporarily exceed Level of Service (LOS) at study intersections under the Existing Plus Project (2016) evaluation scenario. However, because traffic increases would be transitory and temporary, and because PDF TRANS-1 (traffic management plan) would incrementally reduce peak hour trips through avoidance of peak hours to the extent feasible and by consolidating trips, impacts to intersection LOS were found to be less than significant. In addition, cleanup activities would occur within residences, parks, daycares and schools, and would not require excavation within roadways or closure of roadways. During cleanup activities, some lanes may be closed or blocked due to limited space for equipment staging and soil handling activities. In addition, some sidewalks may be closed or blocked where excavation would extend to the sidewalk. However, if lane or sidewalk closures are needed for cleanup activities, it would be completed in accordance with City or County permits and requirements. During cleanup activities, roadway access would be maintained by traffic detours and diversions, including implementation of PDF TRANS-1 (Traffic Management Plan), which would minimize disruptions to traffic flow and emergency vehicle access, as well as pedestrian, bicycle, and transit access. For example, implementation of PDF TRANS-1 would require traffic control, coordination of truck traffic, the use of flagmen, installation of safety barriers, pedestrian signage along sidewalks, and assistance of pedestrians and cyclists. With the implementation of PDF TRANS-1, potential conflicts between emergency vehicles and cleanup activities and other emergency access impacts would be reduced to less than significant levels. Also, the project would not require changes in the operational design of streets or the development of new streets. Construction traffic could contribute to roadway hazards because of the large volume of trucks and construction activity moving in and out of the streets. The Traffic Management Plan under PDF TRANS-1, coordination with jurisdictions to avoid roadwork activity under PDF TRANS-2, and limited exposure of school children under PDF TRANS-3, would reduce this impact to a less than significant level. Implementation of the PDF TRANS-1 through PDF TRANS-3 would also reduce impacts to bicycle and pedestrian facilities and bus services to less than significant levels.

The proposed modification to the project would generate a small increase in construction trip traffic (i.e., four trips per day) which would not cause any significant impacts at studied intersections and is not anticipated to contribute to a significant increase in the overall congestion in the project vicinity. In addition, any truck trips would be limited to the length of time required for the proposed modification to the project's construction. The proposed cleanup of additional areas within PIA (specifically, 7,891 parkways), which were not covered in the Exide Cleanup Plan EIR, includes the excavation and disposal procedures for soil containing lead, arsenic, antimony, cadmium, copper, and/or zinc in exceedance of their respective screening criteria (referred to as the "Parkways Cleanup Goal 80 mg/kg"). The excavation and haul activities would result in approximately 2,158 truckloads of soil for off-site disposal which would account for approximately 2 hauling truck trips per day. The proposed modification to the project also includes restoration of the parkways with clean soil and replacement landscaping. The soil import (clean fill) and landscaping activities would result in approximately 2,878 truckloads of soil for import which would account for approximately 2 truck trips per day. These additional truck trips are not considered significant in relation to the overall project-related truck trips and the PDF TRANS-1 through PDF TRANS-3 would also apply to the excavation and haul activities and soil import and landscaping activities. In addition, while some lanes and sidewalks may be closed or blocked during parkway cleanup activities, such closures or blockages would be completed in accordance with City or County permits and requirements. Furthermore, implementation of PDF TRANS-1 through PDF TRANS-3 would be required, which would minimize disruptions to traffic flow and emergency vehicle access, as well as pedestrian, bicycle, and transit access. Therefore, the proposed modification to the project would not result in a substantial increase in the severity of the impacts identified in the Exide Cleanup Plan EIR related to transportation and traffic.

Senate Bill 743 and Vehicle Miles Traveled

Senate Bill (SB) 743 was signed by Governor Brown in 2013 and required the Governor's Office of Planning and Research (OPR) to amend the CEQA Guidelines to provide an alternative to level of service (LOS) for evaluating transportation impacts. SB 743 specified that the new criteria should promote the reduction of greenhouse gas emissions, promote the development of multimodal transportation networks, and promote a diversity of land uses. The bill also specified that delay-based LOS could no longer be considered an indicator of a significant impact on the environment. In response, Section 15064.3 was added to the CEQA Guidelines beginning January 1, 2019. Section 15064.3(c) states that the provisions of the section shall apply statewide beginning on July 1, 2020. CEQA Guidelines Section 15064.3, Determining the Significance of Transportation Impacts, states that vehicle miles traveled (VMT) is the most appropriate measure of transportation impacts and provides lead agencies with the discretion to choose the most appropriate methodology and thresholds for evaluating VMT. CEQA Guidelines Section 15064.7(c) allow lead agencies to adopt their own thresholds of significance that are supported by substantial evidence.

Even though the excavation, hauling activities, soil import, and landscaping activities from the proposed modification to the project would create vehicular trips, these temporary trips would only occur during construction activities; thus, no long-term VMT would be generated by the proposed modification to the project. Given this and the negligible amount of daily vehicle trips (four per day), no VMT assessment is required for the proposed modification to the project.

Conclusion: *The proposed modification to the project would not result in a substantial increase in the severity of the impacts identified in the Exide Cleanup Plan EIR related to transportation and traffic.*

Attachment 1

Traffic Data/Assumptions

Traffic Data & Assumptions for Comparison of Exide Cleanup Plan EIR vs. Parkways 80 mg/kg Cleanup Goal Addendum

Material Export/Import Assumptions	Exide Cleanup Plan EIR	Exide Cleanup Plan EIR Addendum - Parkways 80 mg/kg Cleanup Goal Scenario
	Assumes 6 houses (3x2) will be remediated simultaneously.	4 parkways per day
Grading and Grubbing (Vegetation Removal) Assumptions	17 CY of vegetation removal	None; assumes it is accounted for in the material excavation estimate provided in
Excavation Assumptions per Property (Average) [cubic yards]	51	4.65
Soil Import (Clean Fill) and Landscaping Assumptions per House [cubic yards]	68	6.20
Excavation Totals [cubic yards]	N/A	36,691
Soil Import (Clean Fill) Totals [cubic yards]	N/A	48,921
Excavation Assumptions per day [cubic yards]	306	18.6
Soil Import (Clean Fill) and Landscaping Assumptions per day [cubic yards]	408	24.8
Haul Truck Trip per day	18.0	1.1
Soil Import Truck Trip per day	24.0	1.5
Haul Truck Total Trips		2,158
Soil Import Truck Total Trips		2,878