CALIFORNIA ENVIRONMENTAL QUALITY ACT
INITIAL STUDY

The Department of Toxic Substances Control (DTSC) has completed the following document for this project in accordance with the California Environmental Quality Act (CEQA) [Pub. Resources Code, div. 13, § 21000 et seq] and accompanying Guidelines [Cal. Code Regs., tit. 14, § 15000 et seq].

PROJECT INFORMATION

PROJECT TITLE: Former Soco-Lynch Facility Feasibility Study and Remedial Action Plan		SITE CODING:
PROJECT ADDRESS: 3270 East Washington Blvd	CITY: Vernon	COUNTY: Los Angeles
PROJECT SPONSOR: Soco West	CONTACT: Syed Rehan, Geosyntec Consultants, Inc.	PHONE: 510-285-2770
APPROVAL ACTION UNDER CONSIDERATION BY DTSC: ☐ Initial Permit Issuance ☐ Permit Re-Issuance ☐ Permit Modification ☐ Closure Plan ☐ Removal Action Workplan ☒ Remedial Action Plan ☐ Interim Removal ☐ Regulations ☐ Corrective Measure Study/Statement of Basis ☐ Other (specify):		
STATUTORY AUTHORITY: ☐ California H&SC, Chap. 6.5 ☒ California H&SC, Chap. 6.8 ☐ Other (specify):		
DTSC PROGRAM/ADDRESS: Site Mitigation and Environmental Restoration Program	CONTACT: Farah Itani	PHONE: 714-484-5471

PROJECT DESCRIPTION:

The Department of Toxic Substances Control (DTSC) is considering approval of a Feasibility Study and Remedial Action Plan (FS/RAP) for the Former Soco-Lynch Facility located at 3270 East Washington Blvd, Vernon, California (the Site, Figures 1 and 2) pursuant to Chapter 6.8, Division 20, Sections 25323.1 and 25356.1 of the California Health & Safety Code, dated July 29, 2021.

Geosyntec Consultants Inc. (Geosyntec) prepared the FS/RAP on behalf of DTSC to describe the evaluation of potential remedial alternatives (RAs) and to present a plan to address chemicals of potential concern (COPCs) in soil and soil vapor at the Site.). The primary Site chemicals of concern (COCs) are perchloroethene, trichloroethene, cis 1,2-dichloroethene, vinyl chloride and 1,4- dioxane. The Site investigations began in 1989 and since then several soil and groundwater investigations have been completed on and off property. The soil on property and perched groundwater on and off property were identified as being impacted with the COCs Groundwater impacted by these contaminants has migrated to the southeast of the Site beneath a roadway. The areas of VOC-impacts in soil, soil vapor and/or groundwater subject to RAs (the Project) are hereafter collectively referred to as the “Project Area”. The DTSC will provide oversight for the implementation of the RA recommended in the FS/RAP in accordance with the Voluntary Cleanup Agreement, Docket No. HAS-FY 18/19-052 (Agreement).

BACKGROUND:

The Site occupies approximately 3-acres of land and is located in an industrial area of Los Angeles County in the City of Vernon. The 3.3-acre property is roughly square and is currently vacant, unpaved with no surface cover and is surrounded by fencing.

The Site is bounded to the north by East Washington Boulevard and to the east by a Los Angeles Department of Water and Power (LADWP) utilities right-of-way. Beyond the LADWP right-of-way is Downey Road, which was constructed partially on property that was occupied by a company known as the Mouren-Laurens Oil Company (MLOC) between 1941 and approximately 1956 (Figure 2).

To the south is a Burlington Northern and Santa Fe (BNSF) Railway right-of-way, with rail tracks immediately adjacent to the Property line. Along the western boundary is a property currently occupied by Washington Food Center East warehouse facility, which was previously occupied by an AKZO/Filtrol industrial facility.

Numerous environmental investigations have been conducted at the Site beginning in 1985. Volatile organic compounds (VOCs) were observed to have impacted the soil, soil vapor, and perched groundwater primarily in two areas of the Property: the Solvent Storage Area in the southeast of the Property and the Liquid Blending Area in the southwest "Triangle Area".

Following the removal of the primary VOC sources (i.e., underground storage tanks) in 1999, a soil vapor extraction (SVE) system was installed and operated, resulting in the removal of approximately 18,100 pounds of VOCs between October 2007 and January 2015 (Arcadis, 2015b).

Once the SVE operation was terminated, shallow, impacted soil was excavated. Approximately 2,670 tons of VOC-impacted soil and 140 tons of metals-impacted soil were removed from the former Liquid Blending Area, and approximately 11,160 tons of VOC-impacted soil and debris were removed from the former Solvent Storage Area. The maximum depth of excavation was approximately 25 feet bgs. In total, to date approximately 13,970 tons of impacted soil have been removed from the Property.

From the implementation of pilot studies, it was determined enhanced reductive dechlorination (ERD) or in situ chemical oxidation (ISCO) would be effective treatments for VOCs in the perched groundwater (Arcadis, 2013b).

The above activities were completed under the regulatory oversight of the Los Angeles Regional Water Quality Control Board (LARWQCB). The LARWQCB approved the 2005 RAP for the Site and the 2013 *RAP Addendum – Perched Groundwater*; the latter RAP proposed a combination of monitored natural attenuation (MNA), ERD, and ISCO for perched groundwater in Areas 1, 2, and 3, respectively (Arcadis, 2013b).

This FS/RAP is the continuation of the previously approved remedial approach in the 2013 RAP Addendum for the perched groundwater and, in addition, addresses the potential risk associated with the remaining impacted soil vapor on the Property. Soil vapor sampling conducted in 2019 and ongoing monitoring of perched groundwater indicate residual VOC impacts in soil vapor and perched groundwater. Based on the distribution of VOCs reported in soil, soil vapor, and perched groundwater, the potential risk and exposure pathway evaluation identified PCE and TCE as the primary COPCs.

The Property was purchased in 1944 by Western Chemical and Manufacturing Company (Western) from the Immanuel Presbyterian Church of Los Angles, and a second adjoining parcel was purchased by Western from the City of Los Angeles in 1946 (Arcadis Geraghty & Miller, 1998a). After a series of mergers and acquisitions, Western merged into Brenntag West, Inc. which later changed its name to Soco West, Inc.

The primary business activities at the Property involved storage, blending, and distribution of bulk industrial chemicals. Dry and liquid chemicals were handled at the Property and were distributed by truck to a wide variety of businesses in southern California. The Property received bulk chemicals from railroad cars and trucks, repackaged the materials into smaller containers for distribution, and in some cases, blended chemicals onsite. Liquid chemicals stored and handled onsite included various solvents, petroleum hydrocarbon products, acids, and caustics. Liquid chemicals were stored in aboveground storage tanks (ASTs) and underground storage tanks (USTs) in the former Liquid Blending Area (former Triangle Area, now part of the former Filtrol facility), in the former Acid-Packing Area near the center of the Property, and the former Solvent Storage Area in the southeast portion of the Property.

All buildings, ASTs, and USTs were removed from the Property by December 2001 (Arcadis, 2005).

VOCs, and primarily TCE and PCE, were first detected at elevated concentrations in soil, soil vapor, and groundwater samples as part of an underground storage tank (UST) monitoring program. Further investigations were conducted in 1988 and 1990 to prepare for a remedial investigation performed in 1992 to develop a Corrective Action Plan for the USTs. Monitoring has been ongoing since then, and the USTs were identified as the sources of these contaminants.

Soil vapor extraction was conducted between 2007 and 2015 as part of Phase II of the 1992 Corrective Action Plan. Shallow soil was also excavated and backfilled in 2013 and 2015. Perched groundwater was treated by enhanced reductive dechlorination (ERD) pilot studies in 2004 and 2012, and a benchtop ISCO feasibility study was conducted in 2013. Contamination remains in the soil, soil vapor, and perched groundwater onsite and adjacent to the Site.

PROJECT ACTIVITIES:

The purpose of this FS/RAP is to evaluate technical alternatives and present recommendations and plans for remediation of soil, soil vapor, and groundwater contaminated with VOCs at concentrations exceeding remedial action objectives (RAOs). The RAOs are site-specific cleanup goals that are protective of human health and the environment. For the purposes of this FS/RAP, the Site has been divided into three active portions and one inactive portion.

Active:

Area 1, comprising the western portion of the Property and a limited area offsite to the south, is characterized by low concentrations of chlorinated volatile organic compounds (CVOCs) which are generally decreasing over time.

Area 2, comprising the southeastern portion of the Property and the southern portion of the LADWP right-of-way, is characterized by CVOCs and elevated concentrations of 1,4 dioxane.

Area 3, comprising an area offsite to the southeast, is downgradient of the Property and the former MLOC facility, and characterized by petroleum hydrocarbons and elevated concentrations of CVOCs.

Inactive:

Area 4 was found not to contain perched groundwater during a 2013 investigation, and therefore is not considered for remedial action.

To address the remaining COPCs in soil vapor and perched groundwater, the draft FS/RAP proposes the following:

• Soil vapor extraction (SVE) in areas where COPC concentrations exceed cleanup levels.

• In situ chemical oxidation (ISCO) using alkaline activated persulfate to address the COPCs in perched groundwater in off-site downgradient areas where 1,4-dioxane is the main COPC.

• Monitored natural attenuation (MNA) for perched groundwater for on-Site portion. MNA uses natural processes to decrease or “attenuate” levels of contaminants in soil and groundwater. Small organisms (or microbes) eat the contaminants and change them into small amounts of water and gases during digestion. MNA will be used to further reduce the relatively low levels of VOCs to below cleanup goals in perched groundwater in the on-Site area.

• Institutional controls, including land use restrictions and appropriate engineering controls such as a vapor intrusion mitigation system as necessary for future buildings.

To treat the remaining contamination to below regulatory action levels, the following RAs are proposed:

- Soil Vapor Extraction (SVE) for treatment of VOCs in soil/soil vapor;
- In Situ Chemical Oxidation (ISCO) using sodium permanganate for treatment of VOCs in groundwater; and
- Monitored Natural Attenuation (MNA) for treatment of VOC-impacted groundwater

The FS/RAP proposes installation of additional vapor extraction wells with continued SVE operation to treat Areas 1 and 2 containing elevated concentrations of VOCs in soil and soil vapor. The FS/RAP also proposes MNA for perched groundwater in Area 1. The FS/RAP proposes that perched groundwater in Areas 2 and 3 be treated first with ISCO to treat relatively high concentrations of VOCs in groundwater. Pilot tests for these remedial alternatives, including ISCO, have been performed in previous remedial efforts. These tests have indicated that ISCO is an effective remedial alternative. Containment methods will be used to prevent human contact with impacted soils, prevent/minimize the downward vertical movement of VOCs to underlying soil and groundwater, and/or effectively mitigate risks associated with vapor intrusion in human-occupied buildings through operation of the subslab depressurization (SSD) system.

Implementation of the remedial actions is expected to begin in January 2022. Construction phase activities (well drilling and installation, trenching and piping, treatment system installation, etc.) are expected to take approximately three months. The SVE system across all active areas is expected to be completed in five years. In Areas 2 and 3, groundwater treatment through ISCO is expected to be completed in three years. In Area 1, MNA is expected to last up to five years. Institutional controls may be implemented throughout the duration of the project to prevent land use changes that could impact ongoing remedial activities or to limit future uses and activities at the site if RAOs are not achievable. Implementation of this component of the overall remedial strategy will be considered in the future based on the effectiveness of the proposed active RAs of the remedy to meet the RAOs.

Information on the site is available on the DTSC website at http://www.envirostor.dtsc.ca.gov/public/. DTSC's EnviroStor database number for the site is 60002627 and the site code is 301820.

Attachments:

Figure 1 - Site Location Map
Figure 2 - Site Vicinity and Location
Appendix A - CalEEMod Model Calculations (annual summary report and summer summary report)

PUBLIC AGENCIES WHOSE APPROVAL IS REQUIRED: (e.g., State Agencies, Counties, Cities, or Air Quality Districts, granting permits, financing approval, or participation agreement.)

The following agency approvals and/or permits would be required prior to implementation of the proposed remedy:

- Boring permits from the Orange County Office of Environmental Health for wells, injection, and extraction points
- Encroachment permits from the City of Vernon for work in the public right-of-way
- An access agreement with the Los Angeles Department of Water and Power (DWP) for work on the DWP right-of-way
- Waste Discharge Requirements (WDR) permit from the Santa Ana Regional Water Quality Control Board for the injection of materials into the shallow perched groundwater
- A permit from the South Coast Air Quality District (SCAQD) to discharge treated effluent from a soil vapor extraction system

NATIVE AMERICAN CONSULTATION: Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?

DTSC formally notified the 9 tribes identified in the Native American Heritage Commission (NAHC) listing on August 25, 2021. DTSC has not received any responses to the AB52 Consultation letter by October 18, 2021.

Note: Please see the Tribal Cultural Resources Section (Section 18) for additional information.

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ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact," as indicated by the checklist beginning on page 6. Please see the checklist beginning on page 6 for additional information.

☐	Aesthetics	☐	Agriculture and Forestry	☐	Air Quality
☐	Biological Resources	☐	Cultural Resources	☐	Energy
☐	Geology/Soils	☐	Greenhouse Gas Emissions	☐	Hazards and Hazardous Materials
☐	Hydrology/Water Quality	☐	Land Use/Planning	☐	Mineral Resources
☐	Noise	☐	Population/Housing	☐	Public Services
☐	Recreation	☐	Transportation	☐	Tribal Cultural Resources
☐	Utilities/Service Systems	☐	Wildfire	☐	Mandatory Findings of Significance

DETERMINATION

On the basis of this initial evaluation:

☒	I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
☐	I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
☐	I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
☐	I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
☐	I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

CERTIFICATION

I hereby certify that the statements furnished above and in the attached documentation, present the data and information required for this initial study evaluation to the best of my ability and that the facts, statements and information presented are true and correct to the best of my knowledge and belief.

Farah Itani	10/19/2021
Preparer's Signature	Date

Farah Itani	Hazardous Substances Engineer	(714) 484 - 5471
Preparer's Name	Preparer's Title	Phone #

Branch or Unit Chief Signature	Date

Branch or Unit Chief Name	Branch or Unit Chief Title	Phone #

EVALUATION OF ENVIRONMENTAL IMPACTS

1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).

2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analyses," as described in (5) below, may be cross-referenced).

5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:

   a) Earlier Analysis Used. Identify and state where they are available for review.
   b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
   c) Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.

8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.

9) The explanation of each issue should identify:

   a) the significance criteria or threshold, if any, used to evaluate each question; and
   b) the mitigation measure identified, if any, to reduce the impact to less than significance

ENVIRONMENTAL IMPACT ANALYSIS

1. AESTHETICS				
Except as provided in Public Resources Code Section 21099, would the project:	**Potentially Significant Impact**	**Less Than Significant with Mitigation**	**Less Than Significant Impact**	**No Impact**
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☐	☒
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from a publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☐	☒
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☐	☒

REGULATORY SETTING (LAWS, ORDINANCES, REGULATIONS, STANDARDS):

The Scenic Highway Program allows county and city governments to apply to the California Department of Transportation (Caltrans) to establish a scenic corridor protection program which was created by the Legislature in 1963. Its purpose is to protect and enhance the natural scenic beauty of California highways and adjacent corridors through special conservation treatment.

The General Plan for the City of Vernon (2015 Edition) notes that Vernon was founded in 1905 as an industrial city and remains so today. The City's mission is to maintain Vernon as an ideal location for industry in Southern California.

ENVIRONMENTAL SETTING (BASELINE):

The Site is located in the City of Vernon which is an industrial city of 5.2 square miles located several miles to the southeast of Downtown Los Angeles in southern California.

The Site is located in a fully developed industrial area in the City of Vernon, west of Downey Street and south of East Washington Boulevard. The Site has been zoned for industrial use by the City of Vernon. It comprises an area of 3.3 acres and is vacant, unpaved with no surface cover, and surrounded by fencing. The site is currently unused, and no residential homes are located within 0.3 miles of the site.

The Site is located approximately one mile south of Interstate 5, four miles east of interstate 110, six miles north of Interstate 405, and two miles west of interstate 710 (Figure 1). These freeways are not designated as scenic highways based on the California Scenic Highway Mapping System (https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways) provided by California Department of Transportation.

As noted in the General Plan, the mission of the City of Vernon is to maintain Vernon as an ideal location for industry. The General Plan does not include provisions for scenic vistas, scenic resources, or aesthetics.

APPLICABLE THRESHOLDS OF SIGNIFICANCE:

The Project is determined to be significant if it would have a substantial adverse effect on a scenic vista; substantially degrade the existing visual character or aesthetic quality of the site and its surroundings; substantially increase the effect of light and glare upon existing uses; and/or result in substantial terrain modifications.

ENVIRONMENTAL STUDIES PERFORMED AND METHODOLOGY:

No project-specific environmental studies related to Aesthetic Resources were prepared for the project. Readily available information was reviewed for this assessment.

IMPACT ANALYSES AND CONCLUSIONS:

Analysis as to whether or not project activities would:

a. Have a substantial adverse effect on a scenic vista?

   Impact Analysis:
   There are no scenic vistas in the immediate site vicinity. The implementation of the remedy would be limited within the Site's boundary and an adjoining area within the neighboring industrial property. No new and permanent above ground structures would be constructed with implementation of the remediation. Its implementation would not obstruct scenic resources or degrade the existing visual character of the area. Further, the implementation of the proposed project would not contribute additional light or glare within the project area as all remediation activities would be implemented and monitored during daylight hours (7 a.m. to 6 p.m.).

   Conclusion: No Impact

b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

   Impact Analysis: There are no scenic resources within the immediate project area, including trees, rock outcroppings, and historic buildings. The project area is surrounded by industrial and railway facilities, as well as City right-of-way streets. The area has been graded and the project will not impact any scenic resources.

   Conclusion: No Impact.

c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

   Impact Analysis: This project is in a Truck and Railway transportation zone. The project activity will not conflict with this zoning nor any other regulations regarding scenic quality.

   Conclusion: No Impact

d. Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area?

   Impact Analysis: The project will not affect lighting/glare in the area. Construction will be conducted during daylight hours and SVE and ISCO equipment will not create a new source of substantial light or glare.

   Conclusion: No Impact

References Used:

City of Vernon General Plan (March 2015). http://www.cityofvernon.org/images/community-services/Zoning/Introduction%202015.pdf

2. AGRICULTURE AND FORESTRY RESOURCES				
In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board.				
Would the project:	**Potentially Significant Impact**	**Less Than Significant with Mitigation**	**Less Than Significant Impact**	**No Impact**
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

REGULATORY SETTING (LAWS, ORDINANCES, REGULATIONS, STANDARDS):

Relevant regulations to project impacts on agriculture and forestry resources in the region include the Williams Act, the Public Resources Code (sections 12220 (g) and 4526), the Government Code (section 51104 (g)), and the City of Vernon General Plan.

The Williamson Act of 1965 was designed as an incentive to retain prime agricultural land and open space in agricultural use, thereby slowing its conversion to urban and suburban development. The goal of the Williamson Act is to protect agriculture and open space.

ENVIRONMENTAL SETTING (BASELINE):

According to the Vernon General Plan and the Farmland Mapping and Monitoring Project (FMMP), the City of Vernon does not contain any Prime Farmland, Unique Farmland, or Farmland of Statewide Importance parcels. Vernon was founded as an industrial city, and it's mission, as stated in the General Plan, is to provide an ideal location for industry in southern California.

The site is located in an industrialized area of Vernon. It has been used for industrial purposes since 1944. The Project Site and its vicinity are not located in an agricultural resource area; therefore, no impact would occur. No further analysis is deemed necessary.

APPLICABLE THRESHOLDS OF SIGNIFICANCE: The project is determined to be significant if it permanently affects agricultural resources.

ENVIRONMENTAL STUDIES PERFORMED AND METHODOLOGY:

A search of maps prepared by the Farmland Mapping and Monitoring Program, of the California Resources Agency, was conducted to identify any farmland near the project area. A query of Williamson Act Contracts was carried out through the California Department of Conservation to identify contracts within the city.

IMPACT ANALYSES AND CONCLUSIONS:

Analysis as to whether or not project activities would:

a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

   Impact Analysis: This project area is located on land designated as "Urban and Built-Up Land" by the California Resources Agency. The project activity will not convert any Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use.

   Conclusion: No Impact

b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?

   Impact Analysis: The site is zoned for industrial use and is not a designated land under the Williamson Act. The California Department of Conservation does not indicate any Williamson Act contracts within the City and thus there would be no impact from the project.

   Conclusion: No Impact

c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?

   Impact Analysis: The impact of project activities is restricted to the Project Area and will not cause rezoning of any areas. There are no forest lands or areas zoned for timberland or timberland production in the City and thus there would be no impact from the project.

   Conclusion: No Impact

d. Result in the loss of forest land or conversion of forest land to non-forest use?

   Impact Analysis: The site lies entirely within a fully developed area zoned for industrial use and will not result in the loss of forest land or convert forest land to non-forest use.

   Conclusion: No Impact

e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural uses?

Impact Analysis: The site lies entirely within a developed area zoned for industrial use and will not result in the loss or conversion of farmland for non-agricultural use.

Conclusion: No Impact

References Used:

California Important Farmland Finder, 2021: https://maps.conservation.ca.gov/DLRP/CIFF/

City of Vernon General Plan (March 2015). http://www.cityofvernon.org/images/community-services/Zoning/Introduction%202015.pdf

Google Earth map, accessed June 2021

3. AIR QUALITY				
Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations.				
Would the project:	**Potentially Significant Impact**	**Less Than Significant with Mitigation**	**Less Than Significant Impact**	**No Impact**
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☐	☒
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☐	☐	☒
c) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☐	☒
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☐	☒

REGULATORY SETTING (LAWS, ORDINANCES, REGULATIONS, STANDARDS):

The site is located in the South Coast Air Basin (SCAB), a 6,600-square mile area. The SCAB is an area of high air pollution potential and is under the jurisdiction of the South Coast Air Quality Management District (SCAQMD). SCAB is designated as a non-attainment area for federal and state standards for ozone, fine particulate matter (PM10), PM2.5, sulfur dioxide, lead, and sulfate.

The air quality impacts of the Project Activities listed above are determined according to criteria set by federal, state, and local pollution standards and regulations. The United States Environmental Protection Agency (US EPA) established national air quality standards pursuant to adoption of the federal Clean Air Act. The California Air Resources Board (CARB) establishes state air quality standards under the Mulford-Carrell Act.

ENVIRONMENTAL SETTING (BASELINE):

The proposed SVE system is intended to operate 24-hours per day, 7-days per week. In addition to vapor discharged from the SVE system, emissions would be generated during drilling and installation of additional SVE and groundwater monitoring wells, injection of sodium permanganate, long-term operation of the SVE system, and routine groundwater sampling. Specifically, particulates and air pollutants would be directly emitted by the engines of various drilling and construction equipment, by engines in trucks and vehicles that transport personnel and material on and off-site, and dust generated from soil excavation and backfilling of conveyance piping.

APPLICABLE THRESHOLDS OF SIGNIFICANCE: Project impact would be considered significant if the proposed project emissions meet the following criteria:

SCAQMD suggested threshold criteria (SCAQMD CEQA Handbook, 1993):

Pollutant	Threshold Criteria	
	Construction Phase (lbs/day)	Operation Phase (lbs/day)
Reactive Organic Gases (ROG)	75	55
Carbon Monoxide (CO)	550	550
Nitrous oxide (NO_X)	100	55
Sulfur Dioxide (SO_2)	150	150
Particulate Matter <10 *μm* (PM_{10})	150	150
Particulate Matter <2.5 *μm* ($PM_{2.5}$)	55	55

ENVIRONMENTAL STUDIES PERFORMED AND METHODOLOGY: Air pollutant emissions and/or ambient concentration increments from existing, project related, and cumulative sources that could potentially impact sensitive receptors within the project area or its vicinity have been estimated using the California Emissions Estimator Model 2016.3.2 (CalEEMod).

The potential air quality impact from project activities was evaluated for short-term impacts during construction phase and long-term impacts during operation phase of the remedial actions. The SCAQMD emission factors were utilized by the CalEEMod to estimate emissions of air pollutants for ROG, CO, NOx, SO2, and PM10, during proposed project construction activities. The construction phase consists of drilling and installing 20 SVE wells and 28 ISCO injection wells (12 permanent and 16 temporary), and approximately 6,000 square feet of trenching for underground SVE piping.

The construction activities are expected to be short-term (up to three months) and, as required by SCAQMD Rule 403, appropriate dust suppression measures will be implemented. The operation phase of the proposed remedial actions includes, sodium permanganate injection using injection wells, operation of the SVE system, quarterly site visits by a technician for SVE system operation and maintenance, and semi-annual groundwater monitoring. CalEEMod calculated daily peak emissions for construction phase and operation phase are provided in the following table.

Activities	ROG	CO	NO_X	SO_2	PM_{10}	$PM_{2.5}$
Construction: Well Drilling and Installation, trenching	1.41	15.60	10.03	0.035	0.77	0.600
Operation: SVE Operation, ISCO injection, and Monitoring	3.59	0.890	7.17	0.016	1.52	0.419
Suggested SCAQMD Criteria - Construction	75	550	100	150	150	55
Suggested SCAQMD Criteria - Operation	55	550	55	150	150	55
Exceeds Threshold Criteria (Yes/No)	***No***	***No***	***No***	***No***	***No***	***No***

The CalEEMod data input, assumptions, and results of the model calculation are presented in Appendix A, which includes the annual summary report and summer summary report for the proposed RAs. The annual summary report provides the model calculated annual average for criteria pollutants and greenhouse gas (GHG), which are discussed in Section 7. The summer summary report provides the model calculated daily maxima for criteria pollutants and GHG.

As noted above, the calculated data for the proposed project activities do not exceed the suggested SCAQMD criteria. Therefore, emissions that would be generated from implementation of the proposed RAs would not result in significant impact on air quality. The proposed RAs will not conflict with or obstruct implementation of the applicable air quality plan or violate any air quality standard or contribute substantially to an existing or projected air quality violation. This project will not result in cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors (e.g., ROG).

IMPACT ANALYSES AND CONCLUSIONS:

Analysis as to whether or not project activities would:

a. Conflict with or obstruct implementation of the applicable air quality plan?

Impact Analysis: The RAs are intended to capture and treat VOCs that could possibly escape into the atmosphere and reduce air quality. The RAs will comply with SCAQMD air quality standards. The project will not conflict or

obstruct implementation of the applicable air quality plan as the estimated emissions from the RAs are well below the SCAQMD suggested threshold criteria.

Conclusion: No Impact

b. Result in cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard

Impact Analysis: The project construction phase, including well drilling and installation and trenching, is expected to be completed in approximately three months. Injection of sodium permanganate as part of ISCO application will be completed at the beginning of the operation phase. As indicated in the FS/RAP, the SVE system will be in operation for up to 3.5 years. Frequency of groundwater monitoring will also be reduced after two years. Therefore, over the course of the operation phase the scope of the RAs will decrease, which will result in decreases in vehicle miles and trips traveled, as well as energy use. In consideration of the cumulatively net increase of any criteria pollutant caused by project activities, the project will not result in net increase of any criteria pollutant in the SCAB.

Conclusion: No Impact

c. Expose sensitive receptors to substantial pollutant concentrations?

Impact Analysis: The project is occurring in an industrial area of Los Angeles. There are no nearby residences. The nearest receptors to the project area are other industrial facilities, the nearest of which lies 150 feet to the west of the property boundary. There are no known sensitive receptors (such as schools, hospitals, nursing homes, or day care facilities) within one-quarter mile of the site. Sensitive receptors will not be exposed to substantial pollutant concentrations from implementation of project activities.

Conclusion: No Impact

d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Impact Analysis: Diluted TCE and PCE are odorless and granular activated carbon use to capture VOCs in soil vapor removed by SVE will also remove organic odors if any are present in the extracted vapor stream. No odors are associated with the ISCO injection.

Conclusion: No Impact

References Used:

California Emissions Estimator Model User's Guide, Version 2016.3.2. 2016.

DTSC. 2004. CEQA Initial Study Workbook, April.

Google earth map accessed June 2021.

SCAQMD. 1993. CEQA Air Quality Handbook, April.

4. BIOLOGICAL RESOURCES				
Would the project:	**Potentially Significant Impact**	**Less Than Significant with Mitigation**	**Less Than Significant Impact**	**No Impact**
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife, U.S. Fish and Wildlife Service, or NOAA Fisheries?	☐	☐	☐	☒
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☐	☒
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☐	☒
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒

REGULATORY SETTING (LAWS, ORDINANCES, REGULATIONS, STANDARDS):

According to the Federal Endangered Species Act (16 USC 1531-1543), a federally endangered species is a species of invertebrate, plant, or wildlife formally listed as facing extinction throughout all or a significant portion of its geographic range. A federally threatened species is one formally listed by the US Fish and Wildlife Service (USFWS) as likely to become endangered within the foreseeable future throughout all or a significant portion of its range. A proposed threatened or endangered species is one officially proposed by the USFWS for addition to the federal threatened or endangered species lists.

The California Endangered Species Act (Section 2050 et seq) prohibits the take of state-listed endangered and threatened species. Section 2090 of CESA requires state agencies to comply with endangered species protection and recovery and to promote conservation of these species.

The California Department of Fish and Wildlife's Natural Community Conservation Planning (NCCP) Program promotes collaborative planning efforts designed to provide for the region-wide conservation of plants, animals, and their habitats, while allowing for compatible and appropriate economic activity. Similarly, and generally in parallel, the USFWS implements the Habitat Conservation Plan (HCP) program which are planning documents required as part of an application for an incidental take permit. These plans describe the anticipated effects of the proposed take; how those impacts will be minimized or mitigated; and how the HCP is to be funded.

ENVIRONMENTAL SETTING (BASELINE):

The site is located within an urban environment in an area zoned for industrial use with little or no native vegetation or habitats. Although the project area is currently vacant and unpaved, it was paved for several decades. Construction and operation of the RAs will not reduce or modify any natural habitat.

APPLICABLE THRESHOLDS OF SIGNIFICANCE:

The project is determined to be significant if it would

- Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife (CDFW) or US Fish and Wildlife Service;
- Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the CDFW or USFWS;
- Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means;
- Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites;
- Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance; and/or • Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan.

ENVIRONMENTAL STUDIES PERFORMED AND METHODOLOGY:

A query of the California Natural Diversity DataBase (CNDDB) was completed to identify known recorded occurrences of state or federally listed threatened, endangered, candidate, sensitive, or special status species in the vicinity of the site. The US Fish and Wildlife Service National Wetland Inventory was also searched to identify any protected wetlands in the vicinity of the site which may be impacted by project activities.

IMPACT ANALYSES AND CONCLUSIONS:

Analysis as to whether or not project activities would:

a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

   Impact Analysis: The project will not modify any habitat used by any candidate, sensitive, or special status species. The site is located in an urban environment zoned for industrial use. A query of the California Natural Diversity DataBase (CNDDB) was completed to identify known recorded occurrences of state or federally listed threatened, endangered, candidate, sensitive, or special status species in the vicinity of the site. A total of 48 plant species, wildlife species, and plant communities were identified in the CNDDB search. The site area provides no suitable habitat for any of the state or federally listed threatened, endangered, candidate, sensitive, or special status species identified in the CNDDB search based on the Los Angeles, South Gate, El Monte, or Whittier, California United States Geological Service 7.5-minute topographic quadrangle maps.

   Conclusion: No Impact

b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?

   Impact Analysis: The City of Vernon is fully urbanized and has little to no green space. The project site is located in the vicinity of the Los Angeles River. This river is not considered riparian wetland as it is concrete lined in this area. The CNDDB Database lists 14 species of plants in the vicinity of the project, none of which are listed as sensitive. The project site has little to no vegetation and will not affect riparian habitat or other sensitive natural communities.

Conclusion: No Impact

c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

Impact Analysis: The site is located near the Los Angeles River, which is listed as a wetland in the United States Fish and Wildlife Service National Wetland Inventory. This wetland is not protected. The existing storm water controls in the project area will regulate and control storm water runoff from the site. Project implementation would not increase the amount of impervious surface and would not increase peak off-site storm water flows. The project would have no impact on federally protected wetlands.

Conclusion: Less than Significant Impact

d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Impact Analysis: The project area does not provide habitat for any native resident or migratory fish or wildlife species and is not located along any migratory fish or wildlife corridor. Additionally, the project site does not contain any native wildlife nursery sites. The project will not affect storm water runoff, which will be controlled and managed by the existing storm water drainage system. The project will not affect the movement of any native resident or migratory fish or other wildlife species.

Conclusion: No Impact

e. Conflict with local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Impact Analysis: The City of Vernon General Plan, Land Use Element (2007) does not identify any local policies or ordinances protecting biological resources in the project area. The project will not directly or indirectly affect any biological resources on or near the site and would thus not conflict any local policies or ordinances protecting biological resources.

Conclusion: No Impact

f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

Impact Analysis: The City of Vernon does not identify any habitat in the city, as it is heavily developed and zoned for industrial use. There is no listed habitat conservation plan in the General Plan for the city. Because of the industrial zoning, as well as the limited impacts of construction and monitoring, the project would not conflict with any adopted conservation plans that might exist.

Conclusion: No Impact

References Used:

California Department of Fish and Wildlife's California RareFind 5 and Bios 5 Natural Diversity Database (CNDDB). 2021, accessed June 10.

California Regional Conservation Plans Map: https:llnrm.dfq.ca.gov/FileHandler.ashx?Document/0=68626&inline

City of Vernon General Plan (March 2015). http://www.cityofvernon.org/images/community-services/Zoning/Introduction%202015.pdf

Google earth map accessed June 2021.

United States Fish and Wildlife Services National Wetland Inventory: https:llwww.fws.gov/wetlandsldata/Mapper.html

5. CULTURAL RESOURCES				
Would the project:	**Potentially Significant Impact**	**Less Than Significant with Mitigation**	**Less Than Significant Impact**	**No Impact**
a) Cause a substantial adverse change in the significance of a historical resource pursuant to in §15064.5?	☐	☐	☐	☒
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	☐	☐	☒
c) Disturb any human remains, including those interred outside of dedicated cemeteries?	☐	☐	☐	☒

REGULATORY SETTING (LAWS, ORDINANCES, REGULATIONS, STANDARDS):

The California Register was created to identify resources deemed worthy of preservation on a state level and was modeled closely after the National Register of Historic Places. Resources listed on the National Register are automatically listed on the California Register.

Historic properties and resources are protected pursuant Section 106, Protection of Historic Properties (36 CFR 800) and Regulatory Historic Property Regulations (33 CFR 325, Appendix C). Cultural and paleontological resources receive protection pursuant to CEQA. Native American internments and associated funerary objects received additional protection with Public Resources Code 5097.98.

ENVIRONMENTAL SETTING (BASELINE):

The site is located in a fully developed urban environment zoned for industrial use. There are no nearby cultural resources. According to the General Plan, Vernon was incorporated as an “exclusively industrial” city in 1905. However, the city intends to “assist in the effort to preserve the memory of early Los Angeles and tell the story of it’s growth and development, through taking and retaining photographs of buildings and structures that may have architectural or historic interest”.

The site and project area have previously been graded and paved, although it is currently unpaved. All project activity, including trenching, groundwater monitoring, and SVE well drilling/construction, and ISCO injection, will occur in areas that have already been disturbed, either by construction and industrial activity, or by previous remediation activity.

APPLICABLE THRESHOLDS OF SIGNIFICANCE

The project is determined to be significant if the proposed plan would:

- Cause a substantial adverse change in the significance of an historical resource as defined in Section 15064.5 of the CEQA Guidelines;
- Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5 of the CEQA Guidelines;
- Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature; or
- Disturb any human remains, including those interred outside of formal cemeteries.

ENVIRONMENTAL STUDIES PERFORMED AND METHODOLOGY:

A California Historical Landmarks search was conducted on the California State Parks Office of Historic Preservation website (http://ohp.parks.ca.gov/?paqe id=21445) for Los Angeles County. The closest historical landmark to the project is the Soto Street Bridge, approximately 0.75 miles northwest of the site.

IMPACT ANALYSES AND CONCLUSIONS:

Analysis as to whether or not project activities would:

a. Cause a substantial adverse change in the significance of a historical resource pursuant to in §15064.5?

Impact Analysis: As described in the City of Vernon General Plan, Land Use Element (2015), the City of Vernon does not have any zones for Historical Resources. No other records of nearby historical resources were found. The project will not cause an adverse change to historical resources.

Conclusion: No Impact

b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?

Impact Analysis: The City of Vernon General Plan does not mention any archaeological sites in the city. As the city is fully developed and entirely industrial, all area has been disturbed. No records of nearby archaeological resources were found. The project will not cause an adverse change to archaeological resources.

Conclusion: No Impact

c. Disturb any human remains, including those interred outside of dedicated cemeteries?

Impact Analysis: The nearest dedicated cemetery is 0.75 miles northeast of the site and does not overlap with the project area. However, if human remains are encountered, work will be suspended within a 50-foot radius of the area of discovery and an effort will be made to protect the resources while notifying the DTSC. The local coroner will also be contracted. The appropriate professionals will determine if the remains are human, and if they are associated with an archaeological deposit. If the remains are not human and are not associated with an archaeological deposit, the work may continue. If the remains are human, the appropriate law enforcement officials will be notified. These officials will visit the site and determine, with the aid of a coroner or physical/forensic anthropologist, if the remains are recent or ancient. If necessary, work will be suspended pursuant to the Native American Graves Protection and Repatriation Act (NAGPRA).

Conclusion: No Impact

References Used:

California Landmarks in Los Angeles County, California State Parks: http://ohp.parks.ca.qovl?paqe id=21445

City of Vernon General Plan (March 2015). http://www.cityofvernon.org/images/community-services/Zoning/Introduction%202015.pdf

6. ENERGY				
Would the project:	**Potentially Significant Impact**	**Less Than Significant with Mitigation**	**Less Than Significant Impact**	**No Impact**
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☒	☐
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☐	☒

REGULATORY SETTING (LAWS, ORDINANCES, REGULATIONS, STANDARDS):

The Energy Policy and Conservation Act of 1975 established the first fuel economy standards for on-road motor vehicles sold in the United States.

The National Energy Act of 1978 includes the Public Utility Regulatory Policies Act (Public Law 95-617), Energy Tax Act (Public Law 95-318), National Energy Conservation Policy Act (Public Law 95-619), Power Plant and Industrial Fuel Use Act (Public Law 95-620), and Natural Gas Policy Act (Public Law 95-621). The intent of the National Energy Act was to promote greater use of renewable energy, provide residential consumers with energy conservation audits to encourage slower growth of electricity demand, and promote fuel efficiency.

The Energy Policy Act of 1992 was enacted to reduce dependence on imported petroleum and improve air quality by addressing all aspects of energy supply and demand, including alternative fuels, renewable energy, and energy efficiency. The Energy Policy Act of 2005 was enacted to set federal energy management requirements for energy-efficient product procurement, energy savings performance contracts, building performance standards, renewable energy requirements, and use of alternative fuels.

The Energy Independence and Security Act was enacted to increase the production of clean renewable fuels; increase the efficiency of products, buildings, and vehicles; improve the federal government's energy performance; and increase U.S. energy security, develop renewable fuel production, and improve vehicle fuel economy.

The Renewable Fuel Standard Program was created by the Energy Policy Act of 2005 and amended the Clean Air Act by establishing requirements to replace certain volumes of petroleum-based fuels with renewable fuels. The 2007 Energy Independence and Security Act expanded the program and its requirements to include long-term goals of using 36 billion gallons of renewable fuels and extending annual renewable-fuel volume requirements to year 2022.

Senate Bill (SB) 1078 (Chapter 516, Statutes of 2002) required retail sellers of electricity, including investor-owned utilities and community choice aggregators, to provide at least 20 percent of their supply from renewable sources by 2017. SB 107 (Chapter 464, Statutes of 2006) changed the target date to 2010. Executive Order S-14-08 expanded the state's Renewables Portfolio Standard (RPS) to 33 percent renewable power by 2020. Executive Order S-21-09 directs the CARB, under its AB 32 authority, to enact regulations to help the state meet its RPS goal of 33 percent renewable energy by 2020. This was followed by SB 100 in 2018, which further increased the RPS to 60 percent by 2030 and added the requirement that all state's electricity come from carbon-free resources by 2045.

ENVIRONMENTAL SETTING (BASELINE):

The City of Vernon is served by the City of Vernon Light and Power Department, which is supplemented by the Southern California Edison bulk power system. The City of Vernon General Plan, Circulation and Infrastructure Element (2007) states that a new natural gas-fired power plant is intended to be constructed within the city to reduce reliance on the Southern California Edison bulk power system. These two power generators will supply power to project activities. Specifically, SVE system operation will rely on the city's power supply. This system will be operated and maintained for a total of 3.5 years and will not draw excessive power from the City's grid.

APPLICABLE THRESHOLDS OF SIGNIFICANCE:

There project is determined to be significant if there is a permanent adverse effect due to wasteful consumption of energy resources.

ENVIRONMENTAL STUDIES PERFORMED AND METHODOLOGY:

No environmental studies were required to assess the project impacts on energy consumption.

IMPACT ANALYSES AND CONCLUSIONS:

Analysis as to whether or not project activities would:

a. Result in potentially significant impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Impact Analysis: Project activities requiring significant power are restricted to the SVE system operation. All other project activities will be completed using gas-powered vehicles. The energy consumption of the project is limited to necessary uses and will have a less than significant impact.

Conclusion: Less than Significant Impact

b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Impact Analysis: Energy use will not conflict or obstruct the state or local plan for renewable energy or energy efficiency. All energy supplied through grid power will reflect renewable energy available to the city.

Conclusion: No Impact

References Used:

City of Vernon General Plan (March 2015). http://www.cityofvernon.org/images/community-services/Zoning/Introduction%202015.pdf

7. GEOLOGY AND SOILS				
Would the project:	**Potentially Significant Impact**	**Less Than Significant with Mitigation**	**Less Than Significant Impact**	**No Impact**
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:	☐	☐	☐	☒
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☐	☒
ii) Strong seismic ground shaking?	☐	☐	☐	☒
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☐	☒
iv) Landslides?	☐	☐	☐	☒
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☐	☒
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☐	☒
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☐	☒
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	☐	☐	☐	☒
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☐	☒

REGULATORY SETTING (LAWS, ORDINANCES, REGULATIONS, STANDARDS):

The Earthquake Hazards Reduction Act (Public Law 95-124, 42 U.S.C. 7701 et. seq., as amended by Public Laws 101614, 105-47, 106-503, and 108-360) was enacted in 1977 to "reduce the risks to life and property from future earthquakes in the United States through the establishment and maintenance of an effective earthquake hazards and reduction program." To accomplish this, the Act established the National Earthquake Hazards Reduction Program.

The Alquist-Priolo Earthquake Fault Zoning Act (Public Resources Code Section 2621-2624, Division 2, Chapter 7.5) was enacted in 1972 to address the hazard of surface faulting to structures for human occupancy. The primary purpose of the Alquist-Priolo Earthquake Fault Zoning Act is to prevent the construction of buildings intended for human occupancy on the surface traces of active faults. Local agencies must enforce the Alquist-Priolo Earthquake Fault Zoning Act in the development permit process, where applicable, and may be more restrictive than state law

requires. The Alquist-Priolo Earthquake Fault Zoning Act and its regulations are presented in California Department of Conservation, California Geological Survey, Special Publications (SP) 42, Fault-rupture Hazard Zones in California.

The Seismic Hazards Mapping Act of 1990 (Public Resources Code Section 2690-2699) addresses the effects of strong ground shaking, liquefaction, landslides, and other ground failures due to seismic events. Under the Seismic Hazards Mapping Act, the State Geologist is required to delineate “seismic hazard zones.” Under Public Resources Code Section 2697, cities and counties shall require, prior to the approval of a project located in a seismic hazard zone, a geotechnical report defining and delineating any seismic hazard.

ENVIRONMENTAL SETTING (BASELINE):

Project activities include groundwater monitoring, injection into groundwater, and SVE well drilling/ installation, as well as trenching for conveyance piping. Project activities are not likely to create an impact. The site is located in the southern portion of the Los Angeles Basin. The nearest known earthquake fault delineated on the California Department of Conservation's Fault Activity Map (2010) is an unnamed fault beginning approximately two miles north of the site. Displacement of this fault occurred during the Late Quaternary period. The nearest known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map (revised 2018), is the Potrero Fault located approximately 8.5 miles southwest of the site.

Sediments beneath the Property consist of the following:

- From ground surface to approximately 15 feet below ground surface (bgs) — a fine-grained zone comprised primarily of clays and silts;
- From 15 to 35 feet bgs — a coarse-grained zone comprised of sands, gravels, and cobbles;
- From approximately 35 to 40 feet bgs — a fine-grained unit comprised of silt; and
- From approximately 45 and 50 feet bgs — a perched groundwater feature less than 6 feet thick between. The sediments at this depth are fine-grained, poorly graded sand and coarse-grained, well graded sand with gravel and cobbles.
- From approximately 45 to 80 ft bgs, the Bellflower aquiclude underlies the perched aquifer. This layer consists of fine-grained clay and silts.

APPLICABLE THRESHOLDS OF SIGNIFICANCE:

Project impacts would be considered significant if it would:

- Expose people or structures to potential substantial adverse effects including the risk of loss, injury, or death involving:
    - Rupture of a known earthquake fault as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other evidence of a known fault
    - Strong seismic ground shaking
    - Seismic related ground failure including liquefaction
    - Landslides
- Result in substantial erosion, loss of topsoil, changes in topography or unstable soil conditions from excavation, grading, or filling;
- Be located on a geological unit or soil that is unstable or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse;
- Alter or destroy a unique geological feature; or
- Be located on expansive soils, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property.

To assess the risk from expansive soils, the Uniform Building Code (1994) outlines the following thresholds for Expansion Indexes (EI):

EI	Expansion Potential
0-20	Vero Low
21-50	Low
51-90	Medium

91-130	High
>130	Very High

ENVIRONMENTAL STUDIES PERFORMED AND METHODOLOGY:

No previous environmental studies were performed for the Project Site. Readily available information, including the Alquist-Priolo Earthquake Fault Zoning map, was reviewed for this assessment.

IMPACT ANALYSES AND CONCLUSIONS:

Analysis as to whether or not project activities would:

a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

Impact Analysis: The site is not located within an earthquake fault zone. The nearest earthquake fault as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning map (Special Publication 42, revised 2018) is located over eight miles southwest of the site. Because project activities are limited in scope and extent, these activities have no potential to rupture a fault or cause seismic disturbances.

Conclusion: No Impact

ii) Strong seismic ground shaking?

Impact Analysis: The proposed remedy involves activities and proposes the use of equipment that has been used at the site previously without causing ground shaking. Drilling wells to the shallow perched groundwater, injecting materials into the shallow perched groundwater, and installing soil vapor extraction wells in the vadose zone above the shallow perched groundwater have negligible potential to cause adverse effects due to strong seismic ground shaking.

Conclusion: No Impact

iii) Seismic-related ground failure, including liquefaction?

Impact Analysis: According to the City of Vernon General Plan, Land Use Element (2007), the site is not located in a liquefaction zone. Furthermore, there are no known earthquake faults within two miles of the site and as noted above, project activities will not induce strong seismic ground shaking. Thus, there is negligible potential for the project to cause adverse effects due to seismic-related ground failure during an earthquake.

Conclusion: No Impact

iv) Landslides?

Impact Analysis: The site is not located in a landslide zone. The project area is relatively flat and has been previously graded. Project activities will not result in landslides.

Conclusion: No Impact.

b. Result in substantial soil erosion or the loss of topsoil?

Impact Analysis: Project activities will not disturb the natural vegetative cover at the Site except as needed to install wells, probes, and conveyance trenching. Thus, the project will not result in substantial soil erosion or loss of topsoil.

Conclusion: No Impact

c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

Impact Analysis: No unstable geologic unit or soil has been encountered in the project area. The soils located beneath the project area are generally stable and project activities will not cause lateral spreading, subsidence, liquefaction, or collapse of soil.

Conclusion: No Impact

d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

Impact Analysis: Soils within the project area are classified as Ramona Loam by the County of Los Angeles. This soil type is not considered expansive. No expansive soils are noted in the City of Vernon General Plan, Land Use Element (2007). Therefore, there would be no impact from project activities.

Conclusion: No Impact

e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

Impact Analysis: Sewers are available for the disposal of wastewater in the project area. Moreover, the project does not entail the installation or use of septic tanks or alternative wastewater disposal systems. Therefore, there would be no impact from project activities.

Conclusion: No Impact

f. Directly or indirectly destroy a unique paleontological resources or site unique feature?

Impact Analysis: No unique paleontological resource or site were identified near the site nor does the site have any unique geologic features. The project will not impact any known paleontological resource or site or unique geologic feature. If any paleontological resource is discovered, work in the area will cease and the discovery will be immediately reported to the appropriate professionals for determination of paleontological significance.

Conclusion: No Impact

References Used:

City of Vernon General Plan (March 2015). http://www.cityofvernon.org/images/community-services/Zoning/Introduction%202015.pdf

Dept. of Conservation, California Geological Survey. 2010. Fault Activity Map of California.

Dept. of Conservation, California Geological Survey. 2018. Earthquake Fault Zones, Special Publication 42.

County of Los Angeles, Soil Type Data. 2006

8. GREENHOUSE GAS EMISSIONS				
Would the project:	**Potentially Significant Impact**	**Less Than Significant with Mitigation**	**Less Than Significant Impact**	**No Impact**
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

REGULATORY SETTING (LAWS, ORDINANCES, REGULATIONS, STANDARDS):

The City of Vernon Community Energy Association developed Greenhouse Gas (GHG) reduction targets in February of 2020. This plan includes an interim target of a 29% per-capita reduction in GHG emissions by 2025.

Governor's Executive Order S-3-05 established greenhouse gas reduction targets.

Assembly Bill 32, the *California Global Warming Solutions Act of 2006*, codified the reductions in Executive Order S-3-05 and identified the California Air Resources Board (CARB) as the agency responsible for attainment of reduction targets.

In December 2008, CARB adopted its Climate Change Scoping Plan. A Framework for Change (Scoping Plan), which contains the main strategies California will implement to achieve the required GHG reductions required by AB 32. The Scoping Plan also includes CARB recommended GHG reductions for each emissions sector of California's GHG inventory.

The City of Vernon's General Plan proposes to reduce emissions associated with automobile use and to maximize the amount of clean electrical power produced while minimizing emissions from power production plants.

ENVIRONMENTAL SETTING (BASELINE):

The project area is located in an industrial zone of the City of Vernon. The current property is unpaved and is not associated with any greenhouse gas emission, either from trips to and from the site, or from activity occurring on-site.

APPLICABLE THRESHOLDS OF SIGNIFICANCE:

The SCAQMD's Interim CEQA GHG Significant Threshold Guidance document establishes a tiered approach to determine whether GHG emissions from a project are considered significant. Under this approach, project emissions will include direct, indirect, and, to the extent information is available, life cycle emissions during construction and operation. Construction emissions will be amortized over the life of the project, defined as 5 years, added to the operation emissions, and compared to the applicable interim GHG significance threshold Tier 1. The following description of Tiers 1 through 3 is taken from SCAQMD's Interim CEQA GHG Significance Threshold Guidance document:

- Tier 1 - consists of evaluating whether the project qualifies for any applicable exemption under CEQA. If the project qualifies for an exemption, no further action is required. If the project does not qualify for an exemption, then it would move to the next tier.

- Tier 2 - consists of determining whether the project is consistent with a GHG reduction plan that may be part of a local general plan. The concept embodied in this tier is equivalent to the existing concept of consistency in CEQA Guidelines §§15064(h) (3), 15125(d), or 15152(a). The GHG reduction plan must, at a minimum, comply with AB 32 GHG reduction goals; include emissions estimates agreed upon by either GARB or the AQMD, have been analyzed under CEQA, and have a certified Final CEQA document. Further, the GHG reduction plan must include a GHG emissions inventory tracking mechanism, process to monitor progress in achieving GHG

emission reduction targets, and a commitment to remedy the excess emissions if GHG reduction goals are not met (enforcement).

If the proposed project is consistent with the qualifying local GHG reduction plan, it is not significant for GHG emissions. If the project is not consistent with a local GHG reduction plan, there is no approved plan, or the GHG reduction plan does not include all the components described above, the project would move to Tier 3.

- Tier 3 - establishes a screening significance threshold level to determine significance using a 90 percent emission capture rate approach. The 90 percent capture rate GHG significance screening level in Tier 3 for stationary sources was derived using the reported annual natural gas consumption for 1,297 permitted facilities for 2006 through 2007 to estimate the 90th percentile of the cumulative natural gas usage for all permitted facilities, which corresponds to 10,000 metric tons of CO2 equivalent emission per year (MTCO2eq/yr).

Due to the lack of applicable exemption under CEQA (Tier 1) and lack of a CEQA-approved GHG reduction plan (Tier 2) for this project, the screening significant threshold level established in Tier 3 will be used to evaluate the GHG impact of the RAs.

ENVIRONMENTAL STUDIES PERFORMED AND METHODOLOGY:

Air pollutant emissions and/or ambient concentration increments from existing, project related, and cumulative sources that could potentially impact sensitive receptors within the project area or its vicinity have been estimated using the California Emissions Estimator Model 2016.3.2 (CalEEMod). Further details of this model can be found in section 3, Air Quality. Results from this model were used to assess short and long term greenhouse gas emissions associated with project activity.

IMPACT ANALYSES AND CONCLUSIONS:

Analysis as to whether or not project activities would:

a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Impact Analysis: GHG emissions associated with project activities were estimated using SCAQMD guidance and its emission model CalEEMod. During the construction phase of project activities (e.g., drilling and installation of 20 SVE wells and 28 ISCO injection wells; trenching for conveyance piping), direct GHG emissions arise from operation of drilling and construction equipment, transporting of waste offsite, delivery of construction materials, and daily commute of workers in truck and passenger vehicles. An estimated 40 metric tons of unmitigated CO2 equivalent emissions would be generated per year. This value is well below the significance threshold of 10,000 metric tons of CO2 equivalent emissions per year (MTCO2eq/yr), established by the SCAQMD in Tier 3.

During the project operation phase, indirect GHG emissions arise from electricity usage for the SVE system and water usage for ISCO injection; direct GHG emissions arise from heavy equipment for ISCO injection, and routine truck and passenger vehicle traffic (direct emissions) for operation and maintenance of the SVE system, and groundwater monitoring. Based on emission factors provided in the CalEEMod, GHG emissions based on the operational activities are calculated to be 607.1 metric tons of CO2 equivalent emissions per year, which is well below the significance threshold established by the SCAQMD (10,000 metric tons of CO2) in Tier 3.

The CalEEMod data input, assumptions and model calculated daily maxima and annual average GHG emissions for the construction and operation phases are provided in Appendix A. These assumptions are based on typical daily maxima, and thus are conservative and overstate annual average conditions. Therefore, the GHG generated from this project will have a less than significant impact on the environment.

Conclusion: Less than significant impact

b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Impact Analysis: The applicable policy is the SCAQMD's GHG policy, which is to reduce GHG emissions to stabilize climate change. As part of this policy, the SCAQMD established performance standards and target GHG reduction objectives that will ultimately contribute to reducing GHG emissions. Further, the SCAQMD policy is to also fully implement the Governor's Executive Order S-3-05 and the Global Warming Solutions Act of 2006 (AB 32), and to reduce GHG emissions 80 percent below 1990 levels or 90 percent below current levels by 2050. On December 5, 2008, the SCAQMD Governing Board adopted the staff proposal for an interim GHG significance threshold for projects where the SCAQMD is lead agency.

The proposed RAs are consistent with the SCAQMD's policy and the Governor's Executive Order and AB 32 because the Project has been designed to ensure that operation, construction, and electricity related GHG emissions are below the SCAQMD's screening significance GHG thresholds, as shown in Appendix A. The project will not conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHG.

Conclusion: Less than significant impact

References Used:

California Air Pollution Control Officers Association (CAPCOA). 2008. CEQA and Climate Change, Evaluating and Addressing Greenhouse Gas Emissions from Projects Subject to the California Environmental Quality Act, January.

California Climate Action Registry. 2009. General Reporting Protocol, version 3. 1.

California Emissions Estimator Model User's Guide, Version 2016.3.2. 2016.

City of Vernon General Plan (March 2015). http://www.cityofvernon.org/images/community-services/Zoning/Introduction%202015.pdf

SCAQMD. 2008. Interim CEQA GHG Significance Threshold for Stationary Sources, Rules, and Plans for use by the AQMD.

9. HAZARDS AND HAZARDOUS MATERIALS				
Would the project:	**Potentially Significant Impact**	**Less Than Significant with Mitigation**	**Less Than Significant Impact**	**No Impact**
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☒	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☐	☒
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☐	☒
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☐	☒
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☐	☒

REGULATORY SETTING (LAWS, ORDINANCES, REGULATIONS, STANDARDS):

The U.S. Department of Transportation (DOT) regulates the transport of hazardous materials under Title 49 of the Code of Federal Regulations (CFR, Title 49) which prohibits the release of hazardous materials to the environment and requires all containers to meet strict standards for impact resistance, strength, and packing compatibility. In addition, Title 49 contains specific requirements for the training of drivers in inspection, operation of vehicles, loading and unloading of materials, the properties and hazards of the materials transported, and the use of vehicle controls and equipment, including operation of emergency equipment.

Titles 22 of the California Code of Regulations (CCR) address hazardous materials and wastes. Title 22 defines, categorizes, and lists hazardous wastes, specifies hazardous waste management standards and transportation requirements.

ENVIRONMENTAL SETTING (BASELINE):

As previously described, site investigation activities have identified VOCs, primarily TCE, in soil, soil vapor, and groundwater underlying the site.

The estimated investigation-derived waste (IDW) generated during project activities includes approximately 12,000 pounds of spent carbon containing VOCs from the SVE treatment system during routine SVE operations, 800 cubic yards of soil cuttings from well drilling and installation and trenching for underground conveyance piping, and up to 100 gallons of purged groundwater generated during routine groundwater sampling events. Nearly all of the IDW generated during project activities is expected to be classified as non-hazardous waste.

The only hazardous substance that will be used during the project is undiluted sodium permanganate (approximately 140,000 pounds of 40% by weight sodium permanganate). Undiluted sodium permanganate will be delivered in totes to the site by authorized hazardous material transporters. The ISCO pilot test work plan will describe methods and procedures for containing and neutralizing any spilled sodium permanganate solution. In addition, the field personnel who will implement the cleanup activities will be trained regarding potential safety and health risks associated with the hazardous waste handling activities as described in the Health and Safety Plan.

APPLICABLE THRESHOLDS OF SIGNIFICANCE:

The project is determined to be significant if it would expose people or the environment to hazardous materials or wastes in excess of Federal, State, or local regulatory standards.

ENVIRONMENTAL STUDIES PERFORMED AND METHODOLOGY:

No environmental studies were performed previously. Readily available information was reviewed for the assessment.

IMPACT ANALYSES AND CONCLUSIONS:

Analysis as to whether or not project activities would:

a. Create a significant hazard to the public or the environment throughout the routine transport, use, or disposal of hazardous materials?

   Impact Analysis: The offsite removal of IDW (e.g., soil cuttings, purged groundwater, spent carbon) will be performed by licensed hazardous waste transporters. Such transportation will be limited to RA construction and routine system operations & maintenance, performance monitoring, and carbon change-out. Undiluted sodium permanganate will be delivered to the site by authorized hazardous material transporters and field personnel will be trained regarding potential safety and health risks associated with the hazardous waste handling activities and methods and procedures for containing and neutralizing any spilled solution. The potential hazard to the current industrial setting around the site would be less than significant.

   Conclusion: Less Than Significant Impact

b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

   Impact Analysis: All IDW generated during the project would be properly characterized and transported offsite to an appropriate waste management facility in compliance with applicable federal, state, and local regulations. In the event there is an accident, trained personnel would carry out the provision of an emergency preparedness plan to prevent, detect, and address any accidents involving the release of hazardous material. In addition, worker health and safety and project waste management plans will be prepared to describe project-specific accident prevention procedures, including managing any release of sodium permanganate. Therefore, there is a less than significant hazard to the public or the environment from the project activities.

   Conclusion: Less than Significant Impact

c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Impact Analysis: The nearest school to the project area is located 0.75 miles from the site, and there are currently no schools proposed in the region. The project area has an industrial zone for one quarter mile radius around it, and newly proposed schools would not be eligible for construction in this area. Therefore, no toxic substances will be emitted within one quarter mile of an existing or proposed school.

Conclusion: No Impact

d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Impact Analysis: The site is not a listed hazardous materials site, and therefore the project would not create a significant hazard to the public or the environment.

Conclusion: No Impact

e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?

Impact Analysis: According to the City of Vernon Zoning Map (2007), the site is not located within two miles of a public airport or public use airport, nor is the site within an airport land use plan. Therefore, the project will not affect air travel.

Conclusion: No Impact

f. Impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan?

Impact Analysis: No adopted emergency response plan or emergency evacuation plan is required for the project. Likewise, construction and monitoring activities are limited to the project area and would not interfere with any other emergency response or emergency evacuation plans.

Conclusion: No Impact

g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

Impact Analysis: The site is located in a fully developed urban area away from wildlands. The project would not increase the risk of wildland fires or expose people or structures to a significant risk of loss, injury, or death from wildland fires.

Conclusion: No Impact

References Used:

City of Vernon General Plan (March 2015). http://www.cityofvernon.org/images/community-services/Zoning/Introduction%202015.pdf

10. HYDROLOGY AND WATER QUALITY				
Would the project:	**Potentially Significant Impact**	**Less Than Significant with Mitigation**	**Less Than Significant Impact**	**No Impact**
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☐	☒
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such the project may impede sustainable groundwater management of the basin?	☐	☐	☐	☒
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:	☐	☐	☐	☒
(i) result in substantial erosion or siltation on- or off-site;	☐	☐	☐	☒
(ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	☐	☐	☐	☒
(iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	☐	☐	☐	☒
(iv) impede or redirect flood flows?	☐	☐	☐	☒
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☐	☒
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☐	☒

REGULATORY SETTING (LAWS, ORDINANCES, REGULATIONS, STANDARDS):

The California Water Code, or Title 23 of the California Code of Regulations, requires that water resources be put to beneficial use to the fullest extent of which they are capable, and that the waste, unreasonable use, or unreasonable method of use of water is illegal. The conservation of water is encouraged as a reasonable and beneficial in the interest of the people and for the public welfare.

The Porter-Cologne Water Quality Act authorizes the RWQCB to regulate discharges of waste and fill material to waters of the state, including “isolated” waters and wetlands, through the issuance of waste discharge requirements (WDRs). Under Porter-Cologne all parties proposing to discharge waste that could affect the quality of waters of the state, other than into a community sewer system, shall file with the appropriate RWQCB a Report of Waste Discharge (ROWD) containing such information and data as may be required by the RWQCB.

FEMA issues flood maps which dictate design standards according to the frequency of flooding in that area.

ENVIRONMENTAL SETTING (BASELINE):

The Site is located within the Downey Plain physiographic province of the Los Angeles Basin. The site is underlain by unconsolidated alluvial sediments from Recent to Pleistocene Age (Lakewood Formation). The Site resides within the Los Angeles Forebay Area of the Central Groundwater Basin. The Los Angeles Forebay is generally described as a region of relatively uninhibited recharge; however, sediments associated with the Bellflower aquiclude have been identified in the southernmost portion of the forebay where the Site is located. The Bellflower aquiclude in this portion of the basin typically contains a relatively high percentage of sand and allows for greater vertical percolation to deeper aquifer sediments than in other areas. Aquifer systems beneath the Site include, in order of increasing depth: the semi-perched aquifer in the recent alluvium; exposition and gage aquifers in the Lakewood Formation, and the Hollydale, Jefferson, Lynwood, Silverado, and Sunnyside aquifers in the San Pedro Formation (Department of Water Resources [DWR], 1961). Regional groundwater beneath the Site is at an approximate depth of 190 feet below ground surface (bgs) with groundwater gradient to the southwest.

The lithology beneath the Site consists of coarse-grained fluvial deposits and fine-grained over-bank deposits associated with the ancestral Los Angeles River. These deposits are gradational and range from silts and clays to coarse-grained sands with gravel and cobbles to an approximate depth of 60 feet. Perched groundwater was generally encountered at approximately 45 feet below ground surface (bgs). The lithology beneath the site has been broken into three horizons:

Horizon 1: Horizon 1 consists of the alluvial sediments present beneath the Property to depths of approximately 45 feet bgs (145 feet above mean sea level [msl]) and up to 60 feet bgs offsite (130 feet above msl). These alluvial sediments are related to historical fluvial disposition of materials by the Los Angeles River. A perched groundwater layer is found in this horizon, as well as the VOC contamination at the Site.

Horizon 2: This horizon unconformably underlies Horizon 1 at depths between approximately 45 and 80 feet bgs (155 to 120 above msl) beneath the Site. Sediments within this horizon consist primarily of low permeability silt, silty clay, and clay sediments and interbedded sands that range gradationally from fine-grained silty sand to fine- to coarse-grained sand with little silt. Horizon 2 is a leaky aquitard that significantly impedes the downward vertical movement of groundwater and VOCs. Horizon 2 is believed to correspond to the Bellflower aquiclude that is known to be present in the southern portion of the Los Angeles Forebay Area at similar depths and is part of the Lakewood Formation (DWR, 1961).

Horizon 3: Horizon 3 conformably underlies Horizon 2 and is present in the Site vicinity at depths from approximately 80 feet to at least 205 feet bgs (120 feet above to 5 feet below msl). Sediments within Horizon 3 consist primarily of interbedded silty sand, fine-grained sand, and fine- to coarse-grained sand with varying gravel. Horizon 3 groundwater occurs within the Gage aquifer (DWR, 1961).

APPLICABLE THRESHOLDS OF SIGNIFICANCE:

The project is determined to be significant if it would:

- Violate any water quality standards or waste discharge standards set by the RWQCB or otherwise substantially degrade surface or groundwater quality;
- Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that the local groundwater table would be lowered;
- Substantially reduce the amount or quality of water otherwise available for public water supplies;
- Substantially alter an existing drainage such that substantial erosion, siltation, or flooding would occur in the City or property in adjacent municipalities;
- Create or substantially contribute to runoff water which would exceed the capacity of existing or planned stormwater drainage systems or create an increase in calculated peak flood discharges;
- Substantially alter a natural water course;
- Place housing or other structures within a 100-year flood hazard zone, as defined by FEMA; or
- Expose people or property to a significant risk of loss, injury, or death from flooding, including flooding by seiche inundation, dam or reservoir failure, tsunami, or mud flows.

ENVIRONMENTAL STUDIES PERFORMED AND METHODOLOGY:

Environmental sample results were compared against applicable regulatory criteria to support remediation design.

IMPACT ANALYSES AND CONCLUSIONS:

Analysis as to whether or not project activities would:

a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Impact Analysis: The project will improve the quality of the perched groundwater and will not impact surface water or the deeper regional groundwater. ISCO is proposed for remediation of VOC-impacted perched groundwater in the project area, which will involve injecting potassium permanganate into the perched groundwater. Before the work can proceed, a work plan will be prepared in part to meet the requirements of Order No. 4-2014-0187, General Waste Discharge Requirement for In Situ Groundwater Remediation at Sites within the Los Angeles Region, dated September 11, 2014, and issued by the Regional Water Quality Control Board, Los Angeles Region (RWQCB) (Waste Discharge Requirement [WDR]). Before the RWQCB issues a WDR, the RWQCB will review and approve a report of waste discharge (ROWD). Subsequently, groundwater quality will be monitored while implementing groundwater RAs to confirm compliance with the WDR. Neither water quality standards nor WDR will be violated by project activity.

Conclusion: No Impact

b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impeded sustainable groundwater management of the basin?

Impact Analysis: The proposed RA involves extracting and treating VOC-impacted groundwater, adding oxidant to create a permanganate solution, and injecting the solution back into the project area. There is no net groundwater loss in this process, thus project activities will not substantially decrease groundwater supplies. If the water-bearing zone does not provide sufficient water for preparing permanganate solution, then water will be provided by a nearby water hydrant. There may be some local changes in groundwater levels because of extraction, reinjection, and/or sampling (including purged groundwater generated during compliance sampling and MNA), but these activities are not expected to cause a significant groundwater table level change beyond the project area boundary. Similarly, project activities are not expected to impact groundwater recharge or impede sustainable management of the basin.

Conclusion: No Impact

c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

(i) result in substantial erosion or siltation on or off-site.

Impact Analysis: The site does not contain a stream or surface water body and will not result in additional impervious areas, and thus there would be no increase in erosion or siltation due to these activities.

Conclusion: No Impact

(ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on-or offsite.

Impact Analysis: The project area has been previously graded, and activities will not result in an increase in surface runoff that would result in flooding on or off site.

Conclusion: No Impact

(iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or

Impact Analysis: The RAs will not result in the additional generation of stormwater and will not exceed the capacity of the current stormwater drainage system. All groundwater extracted for monitoring purposes will be transported offsite for treatment and will not be conveyed to the stormwater drainage system.

Conclusion: No Impact

(iv) impede or redirect flood flows?

Impact Analysis: Project activity will not change the grade of the site, nor will there be any construction of facilities that would significantly impede flood flows. A small facility to house the SVE system will be constructed on-site but will not be large enough to impede or redirect flood flows significantly.

Conclusion: No impact.

d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

Impact Analysis: The site is not within FEMA flood risk zones according to the flood determination maps from the LA County Department of Public Works. The site lies outside the tsunami emergency response planning zone detailed by the California Governor's Office of Emergency Services.

Conclusion: No Impact

e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Impact Analysis: The site is located in the Coastal Plain of Los Angeles Basin. As stated above, project activities will not result in a net loss of groundwater and will not interfere with the implementation of a water quality control plan or sustainable groundwater management plan.

Conclusion: No Impact

References Used:

FEMA Flood Map Service Center, online access available at: https://msc.fema.gov/portal/home.

California Department of Water Resources (DWR). 1961. Planned Utilizations of Groundwater Basins of the Coastal Plain of Los Angeles County. Department of Water Resources Bulletin 104.

SGMA Basin Prioritization Dashboard. Accessed June, 2021: https://gis.water.ca.gov/app/bp-dashboard/final/

California Governor's Office of Emergency Services MyHazards Dashboard, Accessed June 2021: https://myhazards.caloes.ca.gov/

11. LAND USE AND PLANNING				
Would the project:	**Potentially Significant Impact**	**Less Than Significant with Mitigation**	**Less Than Significant Impact**	**No Impact**
a) Physically divide an established community?	☐	☐	☐	☒
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☐	☒

REGULATORY SETTING (LAWS, ORDINANCES, REGULATIONS, STANDARDS):

The City of Vernon General Plan designates land uses for the region.

ENVIRONMENTAL SETTING (BASELINE):

The site lies in a fully developed urban environment which is zoned for industrial use according to the City of Vernon's General Plan, Land Use Element (2007). The entire City of Vernon is zoned for industrial use.

APPLICABLE THRESHOLDS OF SIGNIFICANCE:

The proposed project is determined to be significant if it would:

- Create adverse changes in the functional role and/or predominant pattern of uses within a geographical area;
- Result in an intensification of development density that negatively changes an area's character;
- Result in a substantial loss of open space; or
- Physically divide an established community.

ENVIRONMENTAL STUDIES PERFORMED AND METHODOLOGY:

No previous environmental studies were performed. Project site land use was evaluated according to the City's general plan.

IMPACT ANALYSES AND CONCLUSIONS:

Analysis as to whether or not project activities would:

a. Physically divide an established community?

   Impact Analysis: The project activity is limited to the project area and will not divide an established community.

   Conclusion: No Impact

b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

   Impact Analysis: The project activity is limited to the project area and will not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project.

   Conclusion: No Impact

References Used:

City of Vernon General Plan (March 2015). http://www.cityofvernon.org/images/community-services/Zoning/Introduction%202015.pdf

12. MINERAL RESOURCES				
Would the project:	**Potentially Significant Impact**	**Less Than Significant with Mitigation**	**Less Than Significant Impact**	**No Impact**
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	☐	☐	☐	☒

REGULATORY SETTING (LAWS, ORDINANCES, REGULATIONS, STANDARDS):

The State Mining and Reclamation Act of 1975 (SMARA) requires that the State Mining and Geology Board (SMGB) map areas throughout the State of California that contain regionally significant mineral resources. Aggregate mineral resources within the state are classified by the SMGB through application of the Mineral Resource Zone (MRZ) system. The MRZ system is used to map all mineral commodities within identified jurisdictional boundaries. The MRZ system classifies lands that contain mineral deposits and identifies the presence or absence of substantial sand and gravel deposits and crushed rock source areas (i.e., commodities used as, or in the production of, construction materials).

The City of Vernon, Land Use Element provides guidance on land use and mineral resources.

ENVIRONMENTAL SETTING (BASELINE):

The site is located within an urban environment in an area zoned for light industrial use. Soil conditions within the City are a direct result of stream and wind deposition, and the City is not known to lie above an oil or gas field. There are no mineral extraction activities in the City.

APPLICABLE THRESHOLDS OF SIGNIFICANCE:

The project is determined to be significant if the project results in the loss of availability of a known or locally important mineral resource.

ENVIRONMENTAL STUDIES PERFORMED AND METHODOLOGY:

No environmental studies were required to assess project impacts to mineral resources given the absence of mineral resources at or near the project site.

IMPACT ANALYSES AND CONCLUSIONS:

Analysis as to whether or not project activities would:

a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

   Impact Analysis: Based on the City of Vernon's General Use Plan, Land Use Element (2007), there are no known mineral extraction activities in the City.

   Conclusion: No Impact

b. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

Impact Analysis: As noted above, there are no mineral extraction activities in the City or known mineral resources. The closest known aggregate resources are located north of the City.

Conclusion: No Impact

References Used:

City of Vernon General Plan (March 2015). http://www.cityofvernon.org/images/community-services/Zoning/Introduction%202015.pdf

13. NOISE				
Would the project result in:	**Potentially Significant Impact**	**Less Than Significant with Mitigation**	**Less Than Significant Impact**	**No Impact**
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☒	☐
b) Generation of excessive ground borne vibration or ground borne noise levels?	☐	☐	☒	☐
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

REGULATORY SETTING (LAWS, ORDINANCES, REGULATIONS, STANDARDS):

The City of Vernon's Zoning Ordinance establishes standards for maximum noise levels in the area.

ENVIRONMENTAL SETTING (BASELINE):

The site is located in a fully developed area of the City of Vernon and is zoned for industrial use.

APPLICABLE THRESHOLDS OF SIGNIFICANCE:

The City of Vernon's Zoning Ordinance puts forth the following guidelines for allowable noise as measured at the property line of the noise source:

Noise Zone	Time Interval	Allowable Exterior Noise
Lots located within one tenth (1/10) of a mile of any residence or school located in Vernon or abutting communities.	10:00 P.M. to 7:00 A.M. 7:00 A.M. to 10:00 P.M.	60 dBA 65 dBA
All other Lots	Any time	75 dBA

The project is not within 1/10 mile of any residence or school, and thus is subject to a 75 dBa allowable exterior noise.

ENVIRONMENTAL STUDIES PERFORMED AND METHODOLOGY:

No previous environmental studies were conducted. The assessment is based on readily available information.

IMPACT ANALYSES AND CONCLUSIONS:

Analysis as to whether or not project activities would result in:

a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

   Impact Analysis: The project area is not located within a "noise abatement" area of the City; thus, the noise standards and guidelines listed above apply to this project.

Construction would occur on weekdays between 7:00 am and 6:00 pm and would occur within the project area. Engineering controls (e.g., insulating acoustic blankets, flexible piping) will be installed to reduce ambient noise levels from SVE operations. Project activities, i.e., drilling, well installation, injection of materials into shallow groundwater, and soil vapor extraction and treatment, are conducted routinely without exceeding local noise ordinances.

According to a report published by the U.S. Federal Highway Administration, the average of 22 measurements of noise generated by a drill rig truck was 79 dBa at 50 feet from the truck. Because sound attenuates with distance from the source by the inverse of the distance squared, noise decreases by approximately 6 dBa with each doubling of distance from the source. Therefore, at a distance of 100 feet from the drill rig truck the average noise is expected to be 73 dBa, below the allowable level of 75 dBa. In the event that noise levels cannot be maintained below 75 dBa, sound boards will be placed between the operating equipment and the adjoining community.

Conclusion: Less than Significant Impact

b. Generation of excessive ground borne vibration or ground borne noise levels?

Impact Analysis: The project is not anticipated to generate significant ground borne vibration. Any vibration generated by the construction activities would be short-term in duration and limited to the site area, only occurring during the construction phases of the RAs. Based on the surrounding land uses, any periodic occurrence of ground-borne noise or vibration would be unnoticeable to adjacent properties and impacts would not be significant.

Conclusion: Less than Significant Impact

c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

Impact Analysis: The project is not located in the vicinity of a private airstrip or an airport land use plan, nor is it within two miles of a public airport or public use airport. There will be no impacts from the project on these areas.

Conclusion: No Impact

References Used:

City of Vernon General Plan (March 2015). http://www.cityofvernon.org/images/community-services/Zoning/Introduction%202015.pdf
City of Vernon Code of Ordinances, Table 26.4.1-7(b)(2): Noise Standards

Noise Level Handbook: https://www.fhwa.dot.gov/Environment/noise/construction_noise/handbook/handbook00.cfm; accessed online September 2021

Sound attenuation calculator: https://www.wkcgroup.com/tools-room/inverse-square-law-sound-calculator/
Accessed online September 2021

14. POPULATION AND HOUSING				
Would the Project:	**Potentially Significant Impact**	**Less Than Significant with Mitigation**	**Less Than Significant Impact**	**No Impact**
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☐	☒
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

REGULATORY SETTING (LAWS, ORDINANCES, REGULATIONS, STANDARDS):

The regulatory setting is determined by the City of Vernon General Plan, Land Use Element.

ENVIRONMENTAL SETTING (BASELINE):

The project area is in the City of Vernon and is zoned for industrial use. The surrounding areas are also zoned for industrial use. The nearest residences are approximately 2,000 feet north of the project site. The local work force includes workers that can implement the proposed remedy, so worker relocation is not required. Therefore, increases in population growth or housing demand due to the project are not anticipated.

APPLICABLE THRESHOLDS OF SIGNIFICANCE:

The project would have a significant impact if it adversely impacted the population and housing.

ENVIRONMENTAL STUDIES PERFORMED AND METHODOLOGY:

No environmental study was performed to assess the project impacts on population and housing. The assessment relied on readily available information.

IMPACT ANALYSES AND CONCLUSIONS:

Analysis as to whether or not project activities would:

a. Induce substantial unplanned population growth in area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

   Impact Analysis: The project does not involve construction of new housing or businesses that would directly or indirectly induce substantial population growth in the area.

   Conclusion: No Impact

b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

   Impact Analysis: The project will not displace people necessitating the construction of replacement housing elsewhere.

   Conclusion: No Impact

References Used:

City of Vernon General Plan (March 2015). http://www.cityofvernon.org/images/community-services/Zoning/Introduction%202015.pdf

15. PUBLIC SERVICES				
Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:	**Potentially Significant Impact**	**Less Than Significant with Mitigation**	**Less Than Significant Impact**	**No Impact**
i. Fire protection?	☐	☐	☐	☒
ii. Police protection?	☐	☐	☐	☒
iii. Schools?	☐	☐	☐	☒
iv. Parks?	☐	☐	☐	☒
v. Other public facilities?	☐	☐	☐	☒

REGULATORY SETTING (LAWS, ORDINANCES, REGULATIONS, STANDARDS):

The regulatory setting for project impacts to public services is determined by the City of Vernon General Plan, Land Use Element.

ENVIRONMENTAL SETTING (BASELINE):

The project area is in the City of Vernon and is zoned for industrial use. The surrounding areas are also zoned for industrial use.

APPLICABLE THRESHOLDS OF SIGNIFICANCE:

The project is determined to be significant if it would result in a substantial modification to existing public services.

ENVIRONMENTAL STUDIES PERFORMED AND METHODOLOGY:

No environmental study was prepared to assess the project impacts on public services. The assessment relied on readily available information.

IMPACT ANALYSES AND CONCLUSIONS:

Analysis as to whether or not project activities would:

Result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the following public services:

i. Fire protection?

Impact Analysis: Fire protection services in the City of Vernon are provided through the Consolidated Fire Protection District of Los Angeles County. Two fire stations are located within the city boundaries, one located 1 mile from the site, and the other located approximately 1.4 miles from the site. Project activities will not impact existing fire protection services.

Conclusion: No Impact

ii. Police protection?

Impact Analysis: Police protection services are provided through the Vernon Police Department, headquartered approximately 1.4 miles from the site. Project activities will not impact police protection services.

Conclusion: No Impact

iii. Schools?

Impact Analysis: There are no schools within a 0.75-mile radius. The project will not impact school services.

Conclusion: No Impact

iv. Parks?

Impact Analysis: The City of Vernon is zoned exclusively for Industrial use, with several overlaying zones. The nearest park is 0.75 miles from the project site in a neighboring city. The project will not impact parks.

Conclusion: No Impact

v. Other public facilities?

Impact Analysis: As described above, the project will not impact any public facilities.

Conclusion: No Impact

References Used:

City of Vernon General Plan (March 2015). http://www.cityofvernon.org/images/community-services/Zoning/Introduction%202015.pdf

16. RECREATION				
	Potentially Significant Impact	**Less Than Significant with Mitigation**	**Less Than Significant Impact**	**No Impact**
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☐	☒
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☐	☒

REGULATORY SETTING (LAWS, ORDINANCES, REGULATIONS, STANDARDS):

The regulatory setting is determined by the City of Vernon General Plan, Land Use Element.

ENVIRONMENTAL SETTING (BASELINE):

The project area is in the City of Vernon and is zoned for industrial use. The surrounding areas are also zoned for industrial use. The nearest park is 0.75 miles from the project site.

The City of Vernon's General Plan notes the following:

- "Given the industrial nature of Vernon, expanses of open space are not needed for recreation purposes."
- "The open spaces that exist in Vernon are limited to privately owned landscaping around buildings, utility easements, rail yards, and the Los Angeles River."

APPLICABLE THRESHOLDS OF SIGNIFICANCE:

The project is considered significant if it would result in impacts to existing parks and recreational facilities.

ENVIRONMENTAL STUDIES PERFORMED AND METHODOLOGY:

No previous environmental study was performed to assess the project impacts. The assessment is based on readily available information.

IMPACT ANALYSES AND CONCLUSIONS:

a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

   Impact Analysis: There are no existing neighborhood or regional parks or other recreational facilities within a 0.75-mile radius of the project site. The project will not impact recreational facilities in the region.

   Conclusion: No Impact

b. Does the project include recreational facilities or require construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

   Impact Analysis: The project does not include use of recreational facilities or require construction or expansion of recreational facilities and thus will not have an adverse physical effect on the environment.

   Conclusion: No Impact

References Used:

City of Vernon General Plan (March 2015). http://www.cityofvernon.org/images/community-services/Zoning/Introduction%202015.pdf

17. TRANSPORTATION				
Would the project:	**Potentially Significant Impact**	**Less Than Significant with Mitigation**	**Less Than Significant Impact**	**No Impact**
a) Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	☐	☐	☐	☒
b) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	☐	☐	☐	☒
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☐	☒
d) Result in inadequate emergency access?	☐	☐	☐	☒

REGULATORY SETTING (LAWS, ORDINANCES, REGULATIONS, STANDARDS):

The Code of Federal Regulations (CFR), Title 49, Parts 171-177 govern the transportation of hazardous materials, the types of materials defined as hazardous, and the marking of the transportation vehicles. The administering agencies for the above regulation are the California Highway Patrol (CHP) and the United States Department of Transportation (USDOT). CFR Title 40, Parts 260 – 279 provides requirements for the generation, transportation, treatment, storage, and disposal of hazardous waste.

The Circulation Element of the City of Vernon General Plan (2007) serves as the City's primary guide for transportation planning to accommodating the transportation of goods and people along roads and railways in the City. CEQA Guidelines Section 15064.3, subdivision (b) regulates project impacts to local traffic.

ENVIRONMENTAL SETTING (BASELINE):

The project is located in the City of Vernon and is zoned for industrial use. The General Plan stresses the importance of maintaining a local street system capable of safely and efficiently handling multi-axle truck traffic. The primary streets within the site vicinity are Downey Road and Washington Boulevard. The site is located approximately one mile south of Interstate 5, four miles east of interstate 110, six miles north of Interstate 405, and two miles west of interstate 710 (Figure 1).

The project is also near the Alameda Corridor, which is the key rail center of the City of Vernon.

APPLICABLE THRESHOLDS OF SIGNIFICANCE:

The project would be considered significant if it impacted transportation resources.

ENVIRONMENTAL STUDIES PERFORMED AND METHODOLOGY:

No previous environmental study was performed to assess project impacts on local transportation. The assessment is based on readily available information.

IMPACT ANALYSES AND CONCLUSIONS:

Analysis as to whether or not project activities would:

a. Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadways, bicycle, and pedestrian facilities?

Impact Analysis: Construction activities associated with project implementation would result in the temporary and short-term generation of trips for equipment deliveries and site workers. During construction activities, it is estimated that up to four additional vehicles carrying up to 8 workers would be ingressing and egressing the site each day for no more than two months. This is a fraction of a percent of the traffic estimated for Downey Road and Washington Boulevard. Maintenance and monitoring of the treatment systems and groundwater monitoring was estimated to require one to two vehicles ingressing and egressing the site each quarter. This is even less of an impact than the construction phase and will not result in a significant increase in compared to the existing traffic flow and pattern. Therefore, the project will not conflict with a program, plan, ordinance, or policy addressing the circulation system.

Conclusion: No impact

b. Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?

Impact Analysis: The project activities will not affect automobile delay. The total number of vehicle miles per day during the construction period will be an average of 24.4, which includes four vehicles travelling to and from the site as well as two total trips to the soil waste facility. During the operation and maintenance phase, vehicle miles per day will decrease significantly to an average of 0.15, which accommodates trips for the quarterly SVE system monitoring and the semi-annual groundwater monitoring. These vehicle miles will not impact automobile delay in the region and will not be in conflict or inconsistent with CEQA Guidelines Section 15064.3, subdivision (b).

Conclusion: No impact

c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Impact Analysis: The project will not impact design features or incompatible uses of streets in the site vicinity.

Conclusion: No Impact

d. Result in inadequate emergency access?

Impact Analysis: Project activity will not impact emergency access use of streets in the site vicinity.

Conclusion: No Impact

References Used:

City of Vernon General Plan (March 2015). http://www.cityofvernon.org/images/community-services/Zoning/Introduction%202015.pdf

18. TRIBAL CULTURAL RESOURCES				
Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (See Public Resources Code section 21083.3.2.) Information may also be available from the California Native American Heritage Commission's Sacred Lands File per Public Resources Code section 5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code section 21082.3(c) contains provisions specific to confidentiality.				
Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:	**Potentially Significant Impact**	**Less Than Significant with Mitigation**	**Less Than Significant Impact**	**No Impact**
a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	☐	☐	☐	☒
b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☐	☐	☒

REGULATORY SETTING (LAWS, ORDINANCES, REGULATIONS, STANDARDS

Assembly Bill 52

On September 25, 2014, Governor Jerry Brown signed into law Assembly Bill (AB) 52. California Assembly Bill 52 (AB52) specifies that any project for which a Notice of Preparation, Notice of Mitigated Negative Declaration or Notice of Negative Declaration is filed on or after July 1, 2015, the Lead agency must provide formal notification within 14 days of determining that an application for a project is complete or of a decision to undertake a project to the designated contact or tribal representative of the affiliated California Native American tribes. The tribe that is traditionally and culturally affiliated to the geographic area where a project is located must have requested that the lead agency in question provide notification to the tribe**.**

Public Resource Code Section 21047

The Public resource Code Section 21047 provides the definition of Tribal Cultural Resources.

ENVIRONMENTAL SETTING (BASELINE): A Sacred Lands File search report was receieved from the Native American Heritage Commission (NAHC) for the site on August 20, 2021. The NAHC search identiffied nine Tribal Governments listed on the NAHC contact list. DTSC mailed contact letters on August 25, 2021 to the nine contacts. As of October 18, 2021 no Tribal Government has requested a Consultation.

The Site has been used for industrial purposes since 1944 and buildings were contructed at the Site from the 1950s through 1970s. No discovery of tribal cultural resources was reported during this construction. Subsequently, all structures were removed by 2001.

However, if archaeological or tribal resources are discovered during excavation, then excavating will stop until a qualified archaeologist or appropriately licensed professional can assess the significance of the find and, if necessary, develop appropriate response measures in consultation with the DTSC, other agencies and Native American representatives. If human remains are encountered, excavating will stop and the County Coroner will be immediately notified. Work will not continue until the County Coroner has made a determination of origin and disposition. If the remains are determined to be Native American, the Coroner will notify the Native American Heritage Commission and the County Coordinator of Indian Affairs. As such, there will be no impact to tribal cultural resource.

APPLICABLE THRESHOLDS OF SIGNIFICANCE: The project is determined to be significant there is a permanent adverse change of a tribal cultural resource.

ENVIRONMENTAL STUDIES PERFORMED AND METHODOLOGY: A Sacred Lands File search report was receieved from the Native American Heritage Commission (NAHC) for the Site on August 20, 2021. The NAHC search identiffied nine Tribal Governments listed on the NAHC contact list. DTSC mailed contact letters on August 25, 2021 to the nine contacts. As of October 18, 2021 no Tribal Government has requested a Consultation.

IMPACT ANALYSES AND CONCLUSIONS:

a. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or

Impact Analysis: No tribal cultural resources, as defined in PRC Section 21074 were acknowledged by the Native American Heritage Commission, on the Project Site or in its immediate vicinity. No responses were received to the Tribal inquiries. As described in the Baseline Environmental Conditions, the Project Site has been used continuously for industrial use since 1944 and was previously disturbed for building construction in the 1950s. Based on the Project Site location, history, and absence of cultural resource findings, it is not likely that historical resources would be identified or impacted during corrective measures. However, if archaeological or tribal resources are discovered during excavation, procedures described in the Environmental Setting will be followed.

Conclusion: No impact

ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resource Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

Impact Analysis: There are no known tribal cultural resources, as defined in PRC Section 21074, on the Project Site or in its immediate vicinity. The Project Site has been used continuously for industrial use since 1944 and was previously disturbed for a building construction in the 1950s.

As previously stated, the Project Site has been previously disturbed, and no information regarding the presence of known tribal cultural resources has been provided to DTSC from the identified Tribes or from cultural resource surveys or records. The proposed project also includes a standard operating procedure whereby all possible damages caused in the event of an unanticipated discovery can be avoided. Specifically, if Tribal cultural resources are discovered during the FS/RAP implementation, procedures described in the Environmental Setting would be followed.

Conclusion: No impact

19. UTILITIES AND SERVICE SYSTEMS				
Would the project:	**Potentially Significant Impact**	**Less Than Significant with Mitigation**	**Less Than Significant Impact**	**No Impact**
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☐	☒
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	☐	☐	☐	☒
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☐	☒
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☐	☒
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☐	☒

REGULATORY SETTING (LAWS, ORDINANCES, REGULATIONS, STANDARDS):

The federal Clean Water Act establishes regulatory requirements for potable water supplies including raw and treated water quality criteria.

California's Safe Drinking Water Act stipulates drinking water quality and monitoring standards that are generally equal to or more stringent that the federal standards.

The California Water Code requires the Department of Health Services (DHS) to establish water reclamation criteria. In 1975, the DHS prepared Title 22 to fulfill this requirement. Title 22 regulates production and use of reclaimed water in California by establishing three categories of reclaimed water: primary effluent, which typically includes grit removal and initial sedimentation or settling tanks; adequately disinfected, oxidized effluent (secondary effluent) which typically involves aeration and additional settling basins; and adequately disinfected, oxidized, coagulated, clarified, filtered effluent (tertiary effluent) which typically involves filtration and chlorination. In addition to defining reclaimed water uses, Title 22 also defines requirements for sampling and analysis of effluent and requires specific design requirements for facilities.

The Urban Water Management Planning Act (California Water Code Division 6, Part 2.6 Sections 10610- 10656) was developed due to concerns over potential water supply shortages throughout California. It requires information on water supply reliability and water use efficiency measures. Urban water suppliers are required, as part of the Act, to develop and implement Urban Water Management Plans (UWMPs) to describe water supply, service area demand, population trends and efforts to promote efficient use and management of water resources. An UWMP is intended to serve as a water supply and demand planning document that is updated to reflect changes in the water supplier's service area including water supply trends, and conservation and water use efficiency policies.

ENVIRONMENTAL SETTING (BASELINE):

The site is and will continue to be served by the City of Vernon's Water Department, which is a Class I water system. This system is supplemented by the Metropolitan Water District. The City of Vernon maintains its own sewage collection system, which discharges into the Los Angeles County Sanitation Districts system. Power is supplied by a power generation system within the city as well as Southern California Edison bulk power system. These systems will supply the site with the necessary utility functions throughout the duration of the project.

APPLICABLE THRESHOLDS OF SIGNIFICANCE:

The project is significant if it would adversely impact existing public utility services or require construction of new utilities due to increased demand.

ENVIRONMENTAL STUDIES PERFORMED AND METHODOLOGY:

No environmental studies relating to utilities and service system resources were prepared for the proposed project. Readily available information was reviewed for this assessment.

IMPACT ANALYSES AND CONCLUSIONS:

Analysis as to whether or not project activities would:

a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities the construction or relocation of which could cause significant environmental effects?

   Impact Analysis: All wastewater generated during project construction and monitoring activities will be transported offsite to an appropriate waste disposal facility. The limited volume of wastewater to be managed (generated primarily during groundwater monitoring activities) is insignificant and would not result in the construction of new water or wastewater treatment facilities. The existing storm water controls in the project area will regulate and control storm water runoff from the site, Project implementation would not increase the amount of impervious surface and would not increase peak off-site storm water flows, Thus, the project will not result in the construction of new storm water drainage facilities or expansion of existing facilities. Electricity use to operate the SVE system will not exceed the existing power generation capabilities of the city and will not require the construction of additional electric power facilities.

   Conclusion: No Impact

b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?

   Impact Analysis: Municipal water will be blended with injection materials for treating the shallow groundwater. The quantity of municipal water required for the project is not significant and will not burden the city's water supply capabilities in normal, dry, or multiple dry years.

   Conclusion: No Impact

c. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

   Impact Analysis: The project will require offsite disposal of a limited volume of wastewater at a facility authorized to receive such waste. No additional demand determination is needed from the wastewater treatment provider.

   Conclusion: No Impact

d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

Impact Analysis: Solid waste generated by the project will include site soil excavated for the installation of wells, probes, and conveyance piping. Following SVE operation, SVE equipment will be recycled and/or reused to the extent possible. Equipment that cannot be recycled or reused will be disposed as solid waste. The project will not generate solid waste in excess of State or local standards or in excess of the capacity of local infrastructure or impair attainment of solid waste reduction goals.

Conclusion: No impact

e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Impact Analysis: Any solid wastes generated by the project will be handled according to all applicable federal, state, and local management and reduction statutes and regulations.

Conclusion: No Impact

References Used:

City of Vernon General Plan (March 2015). http://www.cityofvernon.org/images/community-services/Zoning/Introduction%202015.pdf

20. WILDFIRE				
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:	**Potentially Significant Impact**	**Less Than Significant with Mitigation**	**Less Than Significant Impact**	**No Impact**
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☐	☒
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☐	☒
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	☒

REGULATORY SETTING (LAWS, ORDINANCES, REGULATIONS, STANDARDS):

California's Department of Forestry and Fire Protection regulates and responds to wildfire risk in the State of California. There are no regulations directly applicable to project activity.

ENVIRONMENTAL SETTING (BASELINE):

The project area is located an urban environment which is zoned exclusively for industrial use. There is little vegetation on site, and the site has previously been graded. Surrounding buildings and facilities shelter the site from unobstructed high winds.

APPLICABLE THRESHOLDS OF SIGNIFICANCE:

The project is considered significant if it would:

- Substantially impair an emergency response/evacuation plan
- Exacerbate wildfire risks
- Require infrastructure that could exacerbate wildfire risks
- Expose people or structures to significant risks including flooding, landslides as a result of post-fire changes.

ENVIRONMENTAL STUDIES PERFORMED AND METHODOLOGY:

No environmental studies were performed to assess project impacts to wildfires or wildfire risk in the region. The assessment was based on readily available information.

IMPACT ANALYSES AND CONCLUSIONS:

Analysis as to whether or not project activities would:

a. Substantially impair an adopted emergency response plan or emergency evacuation plan?

Impact Analysis: All project activity will occur within the project area and will not impact emergency evacuation routes. Site staff will adhere to the site safety plan in order to safely respond to any wildfires should they impact the project area.

Conclusion: No Impact

b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

Impact Analysis: The project site is graded and sheltered from high winds by surrounding industrial facilities. Furthermore, there is no vegetation on site. The site does not pose a risk as a potential threat to project occupants by aiding to spread wildfire or pollutant concentrations from a wildfire.

Conclusion: No Impact

c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

Impact Analysis: The project activities do not include installing or maintaining these infrastructure elements, and thus will not exacerbate fire risk.

Conclusion: No Impact

d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

Impact Analysis: The project area has been previously graded and does not expose people or structures to risk from downslope flooding or landslide, nor to post-fire slope instability or drainage changes.

Conclusion: No Impact

21. MANDATORY FINDINGS OF SIGNIFICANCE

Based on evidence provided in this Initial Study, DTSC makes the following findings:

a. The project does not have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory.

b. The project does not have impacts that are individually limited but cumulatively considerable. ("Cumulatively considerable" means that the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)

c. The project does not have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly.

Authority: Public Resources Code 21083, 21094.5.5
Reference: Public Resources Code Sections 21094.5 and 21094.5.5