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: Draft Remedial Action Plan, Gardena Sumps		SITE CODING: 200168-48
PROJECT ADDRESS: 1440-1450 West Artesia Boulevard	CITY: Gardena	COUNTY: Los Angeles
PROJECT SPONSOR: Atlantic Richfield Company (ARCO)	CONTACT: Wade Melton	PHONE: (360) 594-7978
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 Restoration Program 5796 Corporate Avenue Cypress, California 90630	CONTACT: Nicholas Ta Project Manager Nicholas.Ta@dtsc.ca.gov	PHONE: (714) 484-5381

PROJECT DESCRIPTION:

The Department of Toxic Substances Control (DTSC) is proposing a remedial action for soil and groundwater at the Gardena Sumps (Site). The remedial action would involve excavating the Haack Rework Area and a portion of sludge overflow along the eastern perimeter of the Cooper Sumps and consolidating the materials above the Cooper North and South Sumps (Figure 1). A cap consisting of a stabilization layer, foundation layer, low-hydraulic conductivity layer, and erosion resistance layer would be constructed above the sumps. A vapor control and monitoring system would be installed beneath the cap and around the sumps, and existing groundwater monitoring occurring at the Site would continue.

BACKGROUND:

The Site is located at 1440-1450 West Artesia Boulevard, in the southwest corner of the Artesia Boulevard and Normandie Avenue intersection, in the City of Gardena, Los Angeles County, California. Generally, the Site is bordered to the south by the Los Angeles County Department of Public Works (LACDPW) Dominguez Flood Control Channel, to the east by the Southern Pacific Railroad right-of-way and Normandie Avenue, to the west by commercial properties, and to the north by Artesia Boulevard, although a small portion of Artesia Boulevard is included within the Site.

The Site, shown on Figures 1 through 4 below, is approximately 6.48 acres of mixed-use development (i.e., residential and commercial) and primarily consists of two properties, the Cooper property and the Haack property. The Cooper property is comprised of two large sumps (referred to as the “Cooper North” and “Cooper South” sumps). The Haack property contains one modified sump (referred to as the “Haack sump”) and the “Haack Rework Area,” which is a reworked and mixed sludge-soil area south of the Haack sump. The Haack Rework Area encroaches onto the extreme northern portions of the two easternmost residential lots. Commercial property is located west of the Haack sump, and four residential properties are located south of the commercial property and the Haack sump.

The site was developed as a clay mine during the 1920s by the Moneta Brick Company. Clay mining resulted in excavations that were reportedly used for oil sludge disposal beginning in approximately 1940. By September 1946, the Haack, Cooper South and Cooper North Sumps had been filled with sludge, and vegetation had reclaimed the Haack Rework Area.

By December 1951, the western portion of the Haack Sump had been covered with dirt and was converted into a parking lot. On October 1, 1952, the northern-most strip of the Site property was sold to the State of California for a highway easement. By early 1956, Artesia Boulevard (Highway 91) had been constructed, with the southern portion of the roadway encroaching into the Haack Sump northern berm. By January 1958, the Dominguez Channel had been reconstructed and extended eastward south of the Site.

By November 1962, the bluff on the Haack Property had been excavated southward to expand the Haack parking lot, although the eastern portion of the Haack property contained sludge immediately west of the Cooper North Sump. The Haack Rework Area appeared altered and may have received soil cover from excavation activities that occurred immediately north of the Haack Rework Area. The future Cooper property was unchanged even after it was sold to Thomas Cooper in December 1977.

Currently, the two Cooper sumps are capped by a geosynthetic liner that was installed by OHM Corporation (OHM) in July 1993 as part of the DTSC's environmental program at the Site. An additional geosynthetic liner was placed over the original liner in August 2013. The Haack Sump has been covered by asphalt and a concrete slab. Currently the Haack property is leased to various tenants who operate small businesses, including a U-Haul rental agency, a metal fabricating, sand blasting and painting company, and an auto body repair shop. Three buildings and numerous small trailer-type storage structures are present on the Haack property.

Interim Remedial Actions

Since the Site was identified by the DTSC in 1981, three previous removal actions have been performed and are described below.

1. 1993-1994 Cooper Sumps Interim Cover

   In 1993, the DTSC prepared an Engineering Evaluation/Cost Analysis Report (EECAR) for the Site with the objective of preventing human dermal contact with the sludge. Between June and August 1993, the removal action was implemented. The interim cover was constructed to prevent dermal contact with the sludge over an area of approximately 114,000 square feet.

   In January 1994, a layer of clean fill dirt was placed above exposed areas of sludge on the Southern Pacific Railroad right-of-way to the east. Additionally, a fence was installed around an approximately 12,000 square foot portion of the Southern Pacific Railroad right-of-way bordering the Site.

2. 1998 Haack Property Cover

   As part of the legal settlement between the DTSC and Mr. Clarence Haack (Haack property owner), DTSC Docket #91/92-012, Mr. Haack was responsible for abating the risk to human health from the sludge on his property. A cover was constructed, reportedly consisting of a visqueen vapor barrier, with 2 inches of sand above and below to provide protection, and a concrete cap. The concrete cap included steel reinforcement within a minimum 6-inch-thick slab.

3. 2013 Cooper Sumps Additional Cover

   In August 2013, the new reinforced polypropylene (RPP) geomembrane material was hot air welded along internal seams and seam taped and hot air welded to the underlying original geomembrane along the perimeter of the existing cover.

PROJECT ACTIVITIES:

A human health risk assessment prepared for the Site identified the primary chemicals of concern to include:

Arsenic, hexavalent chromium, naphthalene, and the benzo(a)pyrene in soils;

Benzene and hydrogen sulfide in air; and

Dibenz(a,h)anthracene in groundwater.

Based on the approved Feasibility Study, the corrective actions would involve constructing a cap, excavating contaminated soils at select areas, and then constructing a cover that will eliminate the need for a retaining wall adjacent to Artesia Boulevard; this work is anticipated to accommodate future potential redevelopment of the Site as a parking lot to support future commercial development on the area of the Site outside the sump footprints. This corrective action would effectively mitigate the risk from ingestion, inhalation, and dermal contact with on-Site contaminated soils for both future non-residential and residential occupants of buildings on Site, and future landscapers and utility workers. In addition, the corrective actions would effectively mitigate the risk from dermal contact with Site groundwater through construction of a cap and institutional controls (i.e., restrictions on land use as a residence, day care center for children,

long-term care hospital, or a traditional public or private school for persons less than 21 years of age, without DTSC consent; required long-term monitoring and inspection).

Individual components of the overall corrective action involve the following activities:

1. Excavating approximately 200 cubic yards of degraded and soil-sludge mixture (Haack Rework Area);
2. Consolidating excavated degraded and soil-sludge mixture materials on site;
3. Grading at excavated areas;
4. Grading and installing a cap over the Cooper North and Cooper South sumps;
5. Installing a retaining wall system along the north side of the Haack sump;
6. Installing a vapor control and monitoring system;
7. Installing and operating a groundwater monitoring system; and
8. Restoring vegetation and the overall Site conditions.

Schedule

Construction activities would take a total of approximately 4 months. The Corrective Actions would follow the sequence of actions:

1. Mobilization and Setup: Mobilize equipment (e.g., excavators, loaders, trucks, water tanks, foam applicators), materials, and construction personnel. Set up office trailers, staging areas, temporary utilities, and access roads.
2. Vapor Monitoring and Control: Air monitoring will be conducted during excavation activities for health and safety as well as for nuisance odors.
3. Site Clearing and Demolition: Demolish and remove structures, pavement, vegetation, and debris remaining within the construction area on the Haack and Cooper properties and demolish relevant residential structures that conflict with remedy implementation.
4. Anchor Trench Excavation and Cap Stabilization Layer: Install a high-strength geotextile above the existing Cooper Sump geomembrane and anchor the perimeter of the geotextile in an anchor trench.
5. Sheet Pile Wall Installation: Sheet piles will be installed to a maximum depth corresponding to the bottom depth of the identified sludge in the Cooper North and Haack Sumps. The sheet pile cut-off wall will provide a physical barrier between the sludge remaining in the Haack and Cooper North Sumps and Artesia Boulevard and adjacent sidewalk.
6. Installation of Vapor Collection and Control System: The Vapor Collection and Control system will be comprised of below-cap horizontal vapor collection geostrips, perimeter vertical vapor migration control wells, vapor treatment system, soil vapor monitor probes, and groundwater monitor wells (Figures 3 and 4).
7. Sludge Excavation and Consolidation: Sludge and soil materials would be excavated from the Haack Rework Area, and certain overflow areas on the eastern portion of the Cooper Sumps (Figure 1). The Haack Rework Area would be excavated to an elevation of approximately 20 feet above mean sea level (amsl) (Figure 2). Anchor trench materials and sludge located along the northeast perimeter of the Cooper North Sump would be excavated to the extent sludge is found outside the limits of the anchor trench. Excavated materials would be utilized as a portion of the cap system stabilization layer and/or foundation layer.
8. Cap System Construction:
    a. Foundation Soil: The foundation soil would be placed above the high-strength geotextile (Cooper Sumps) or asphalt/concrete surface (Haack Sump). The foundation soil would consist of excavated material from the Haack Rework Area and the anchor trench excavations.
    b. Vapor Collection Layer: Rows of vapor collection geostrips would be placed at the surface of the finished foundation layer. The geostrips would generally be 6 to 12 inches wide and up to 1 inch thick, and consist of a geosynthetic filter fabric surrounding a molded polyethylene core. The molded polyethylene core provides a pathway for the vapor to travel, while the filter fabric prevents soil intrusion into the core.
    c. Low Hydraulic Conductivity Layer: The low hydraulic conductivity layer would be placed above the foundation soil and vapor collection geostrips and geocomposite and will consist of a geosynthetic clay liner (GCL) overlain by a high-density polyethylene (HDPE) geomembrane.

d. Anchor Trenches: The GCL and HDPE geomembrane would be secured by an anchor trench around the perimeter of the cap. The anchor trench would vary in configuration depending on the termination condition. Along the cap perimeter, the anchor trench would consist of a v-shaped trench filled with soil and concrete to form a surface water drainage ditch.

e. Drainage Layer: The drainage layer would overlie the low hydraulic conductivity layer and provide a means to drain surface water that percolates through the erosion resistance layer to minimize head build up on the low hydraulic conductivity layer.

f. Erosion Resistance Layer: The erosion resistance layer would overlie the drainage geocomposite and would consist of 1 foot of an aggregate base material. The aggregate base material would be resistant to foreseeable erosion effects caused by wind-scour, raindrop impact, and runoff prior to Site development.

g. Haack Protection Layer: At the northern-most portion of the Haack Sump, along the retaining wall and sheet pile wall alignment adjacent to Artesia Boulevard, the geosynthetics and sheet pile wall would be protected by landscaping in the form of decorative rock, artificial turf, and/or planter box-type vegetation structures.

h. Curb Installation: Immediately adjacent to the Artesia Boulevard sidewalk, the Haack Sump and a portion of the Cooper North Sump caps would terminate at a concrete curb. The curb would deter unintended light traffic across the slope, act as a water-stop for drainage from the slope and accommodate slight variations in the existing Haack Sump concrete slab surface elevation.

9. Final Administrative Work: Establish final Site conditions, implement monitoring and maintenance requirements (soil vapor and groundwater monitoring, operate the vapor collection system), and implement administrative controls/restrictive covenants.

10. Groundwater Monitoring: Groundwater and soil vapor monitoring would be established and documented. During initial operation, soil vapor data, including constituents extracted and their concentrations, would be collected. The need for active vapor collection would be based on the extracted soil vapor COC concentrations and associated, calculated health risk goals. If start-up data indicates that COC concentrations are below risk- based trigger concentrations, and therefore, active vapor collection is not needed, the system could be converted to a passive system which vents to the atmosphere.

PUBLIC AGENCIES WHOSE APPROVAL IS REQUIRED:

While DTSC approves the overall remedy for the Site, other public agencies may be involved through permitting or consultation such as the State Water Resources Control Board, California Department of Fish and Wildlife, U.S. Fish and Wildlife Service, and the City of Gardena.

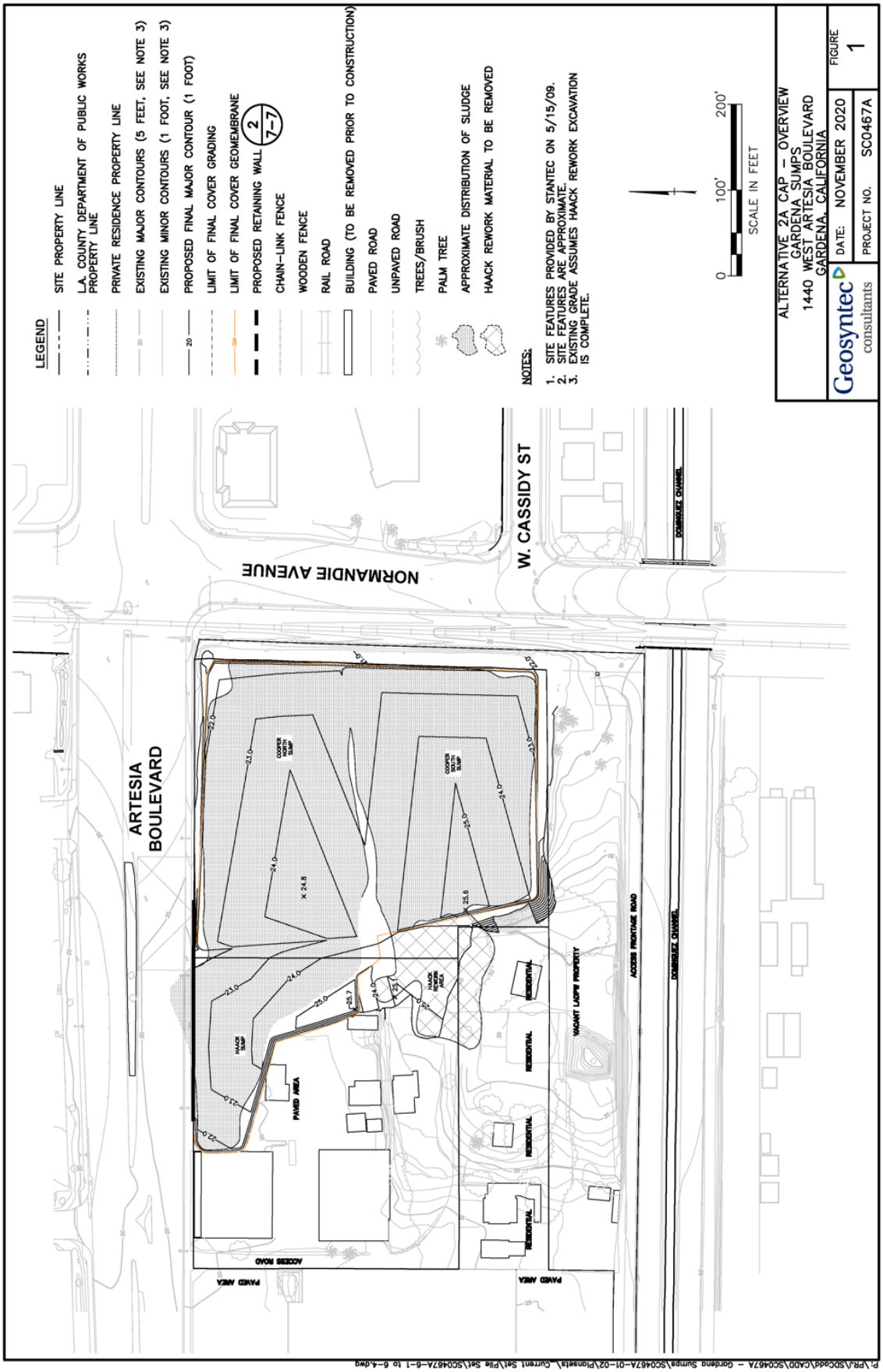
NATIVE AMERICAN CONSULTATION:

DTSC complied with the 2014 Assembly Bill 52 (AB52). DTSC provided written notification to seven tribes on the Tribal Consultation List from the Native American Heritage Commission (NAHC) regarding the Proposed Project on October 5, 2021. The notice included a brief project description, project location, and lead agency's contact information. DTSC did not receive interest from any Tribal governments contacted.

Based on the Proposed Project Site location, history, and absence of cultural resource findings during prior Site work, it is not likely that historical resources would be identified or impacted during remedial actions. However, if historical resources are discovered during remedial actions, then work would stop in that area 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 and other agencies and Native American representatives, as appropriate. Please refer to the Tribal Cultural Resources analysis (Section 18) for additional information.

REFERENCES USED:

Atlantic Richfield Company. 2021. Draft Remedial Action Plan, Gardena Sumps. https://www.envirostor.dtsc.ca.gov/public/profile_report.asp?global_id=19490135 Prepared by Geosyntec Consultants. January 18, 2021.


LEGEND
SITE PROPERTY LINE
L.A. COUNTY DEPARTMENT OF PUBLIC WORKS PROPERTY LINE
PRIVATE RESIDENCE PROPERTY LINE
EXISTING MAJOR CONTOURS (5 FEET, SEE NOTE 3)
EXISTING MINOR CONTOURS (1 FOOT, SEE NOTE 3)
PROPOSED FINAL MAJOR CONTOUR (1 FOOT)
LIMIT OF FINAL COVER GRADING
LIMIT OF FINAL COVER GEOMEMBRANE
PROPOSED RETAINING WALL 2 7-7
CHAIN-LINK FENCE
WOODEN FENCE
RAIL ROAD
BUILDING (TO BE REMOVED PRIOR TO CONSTRUCTION)
PAVED ROAD
UNPAVED ROAD
TREES/BRUSH
PALM TREE
APPROXIMATE DISTRIBUTION OF SLUDGE
HAACK REWORK MATERIAL TO BE REMOVED
NOTES:
1. SITE FEATURES PROVIDED BY STANTEC ON 5/15/09.
2. SITE FEATURES ARE APPROXIMATE.
3. EXISTING GRADE ASSUMES HAACK REWORK EXCAVATION IS COMPLETE.
0 100' 200'
SCALE IN FEET
ALTERNATIVE 2A CAP – OVERVIEW
GARDENA SUMPS
1440 WEST ARTESIA BOULEVARD
GARDENA, CALIFORNIA
Geosyntec consultants
DATE: NOVEMBER 2020
PROJECT NO. SC0467A
FIGURE 1
ARTESIA BOULEVARD
NORMANDIE AVENUE
W. CASSIDY ST
DOMINGUEZ CHANNEL
ACCESS ROAD
PAVED AREA
ACCESS FRONTAGE ROAD
VACANT LADPW PROPERTY
RESIDENTIAL
HAACK SUMP
HAACK REWORK AREA
COOPER NORTH SUMP
COOPER SOUTH SUMP
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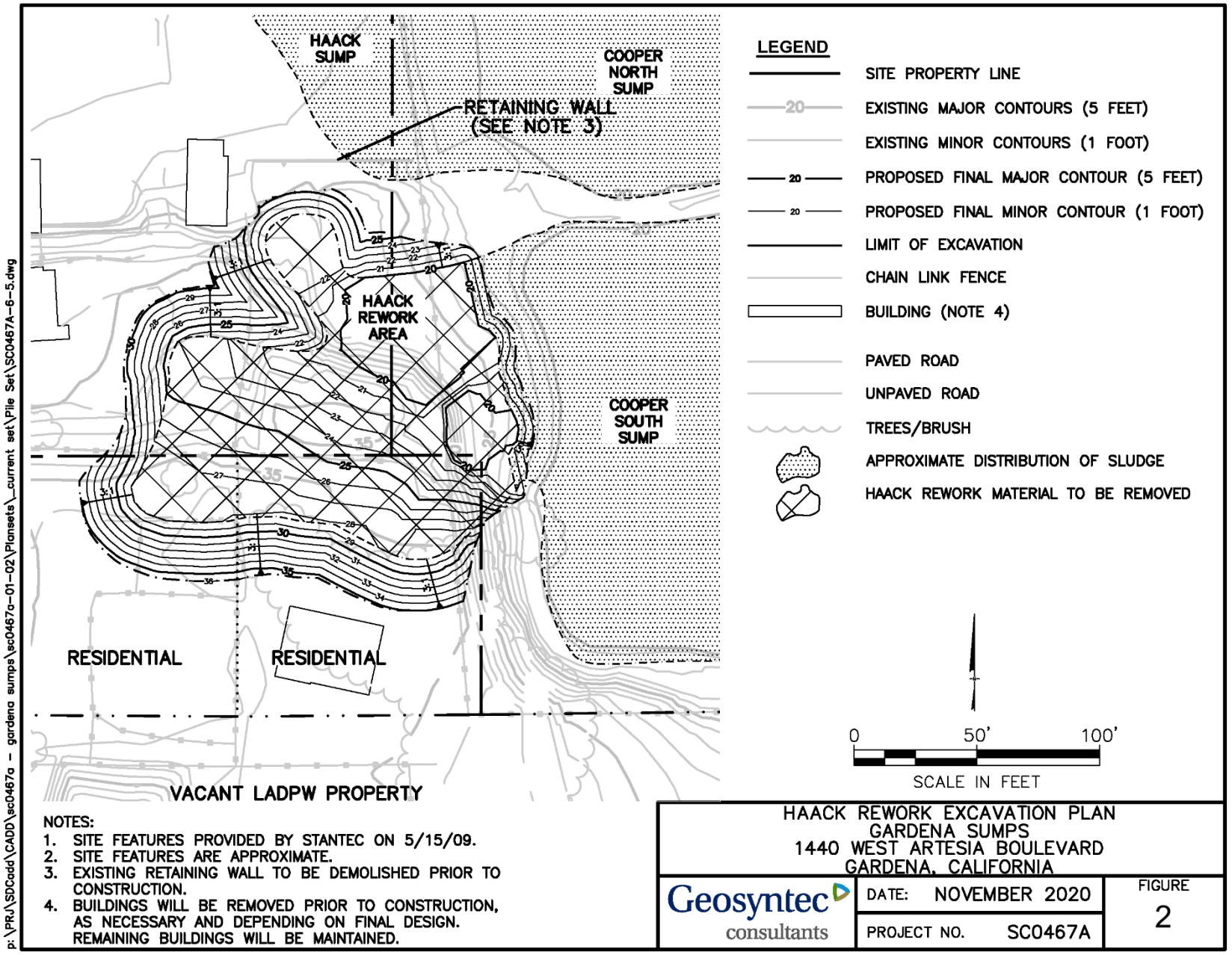

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NOTES:
1. SITE FEATURES PROVIDED BY STANTEC ON 5/15/09.
2. SITE FEATURES ARE APPROXIMATE.
3. EXISTING RETAINING WALL TO BE DEMOLISHED PRIOR TO CONSTRUCTION.
4. BUILDINGS WILL BE REMOVED PRIOR TO CONSTRUCTION, AS NECESSARY AND DEPENDING ON FINAL DESIGN. REMAINING BUILDINGS WILL BE MAINTAINED.

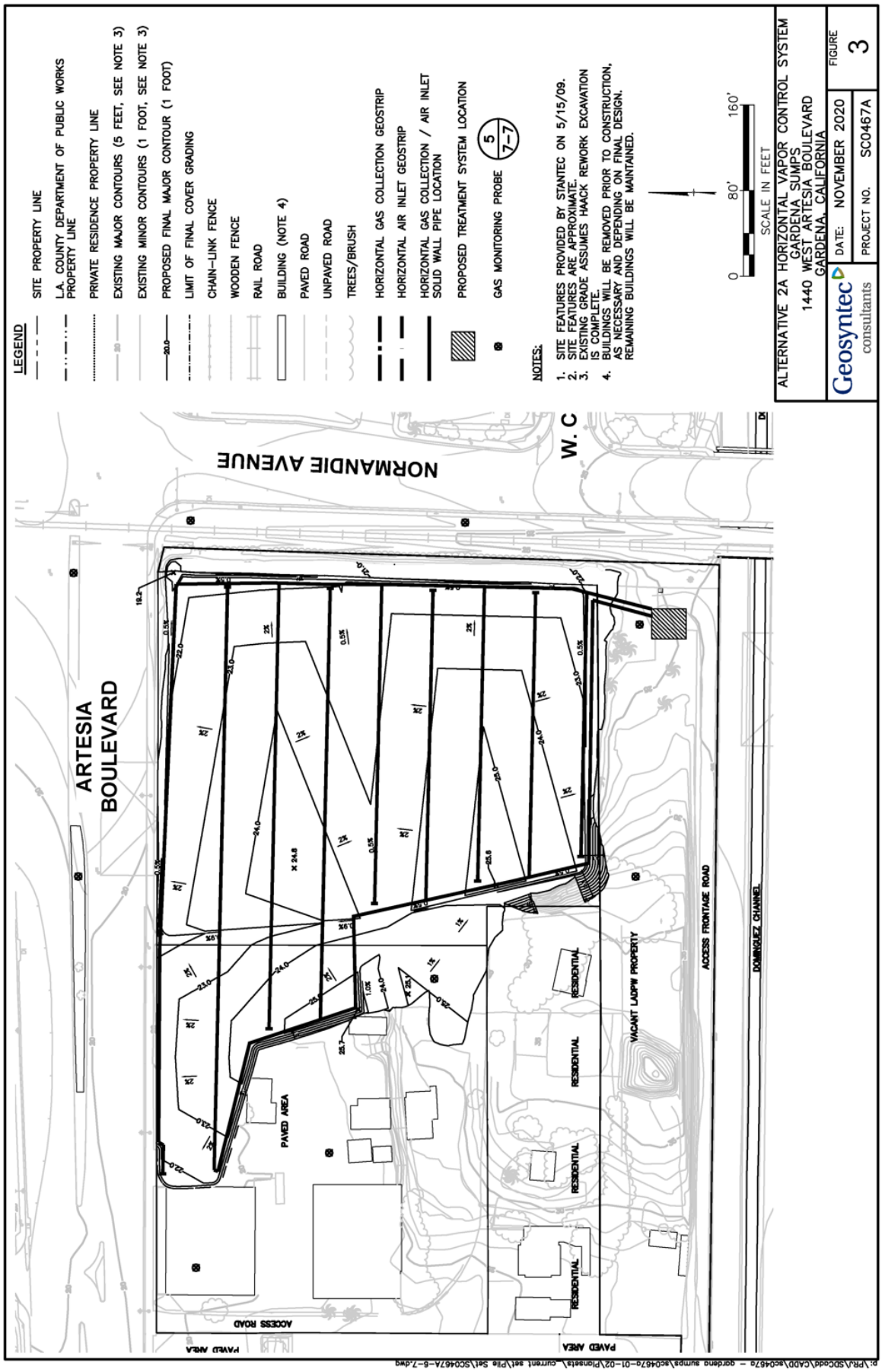
HAACK REWORK EXCAVATION PLAN
GARDENA SUMPS
1440 WEST ARTESIA BOULEVARD
GARDENA, CALIFORNIA

Geosyntec consultants

DATE: NOVEMBER 2020

PROJECT NO. SC0467A

FIGURE 2


LEGEND
SITE PROPERTY LINE
L.A. COUNTY DEPARTMENT OF PUBLIC WORKS PROPERTY LINE
PRIVATE RESIDENCE PROPERTY LINE
EXISTING MAJOR CONTOURS (5 FEET, SEE NOTE 3)
EXISTING MINOR CONTOURS (1 FOOT, SEE NOTE 3)
PROPOSED FINAL MAJOR CONTOUR (1 FOOT)
LIMIT OF FINAL COVER GRADING
CHAIN-LINK FENCE
WOODEN FENCE
RAIL ROAD
TREES/BRUSH
BUILDING (NOTE 4)
PAVED ROAD
UNPAVED ROAD
HORIZONTAL GAS COLLECTION GEOSTRIP
HORIZONTAL AIR INLET GEOSTRIP
HORIZONTAL GAS COLLECTION / AIR INLET SOLID WALL PIPE LOCATION
PROPOSED TREATMENT SYSTEM LOCATION
GAS MONITORING PROBE
NOTES:
1. SITE FEATURES PROVIDED BY STANTEC ON 5/15/09.
2. SITE FEATURES ARE APPROXIMATE.
3. EXISTING GRADE ASSUMES HAACK REWORK EXCAVATION IS COMPLETE.
4. BUILDINGS WILL BE REMOVED PRIOR TO CONSTRUCTION, AS NECESSARY AND DEPENDING ON FINAL DESIGN. REMAINING BUILDINGS WILL BE MAINTAINED.
SCALE IN FEET
0
80'
160'
ALTERNATIVE 2A HORIZONTAL VAPOR CONTROL SYSTEM
GARDENA SUMPS
1440 WEST ARTESIA BOULEVARD
GARDENA, CALIFORNIA
Geosyntec consultants
DATE: NOVEMBER 2020
PROJECT NO. SC0467A
FIGURE 3
ARTESIA BOULEVARD
NORMANDIE AVENUE
W. C
PAVED AREA
ACCESS ROAD
RESIDENTIAL
VACANT LADPW PROPERTY
ACCESS FRONTAGE ROAD
DOMINGUEZ CHANNEL
P:\PR\SDCadd\SC0467a - gardena sumps\SC0467a-01-02\Plansets_current set\Pile Set\SC0467A-6-7.dwg

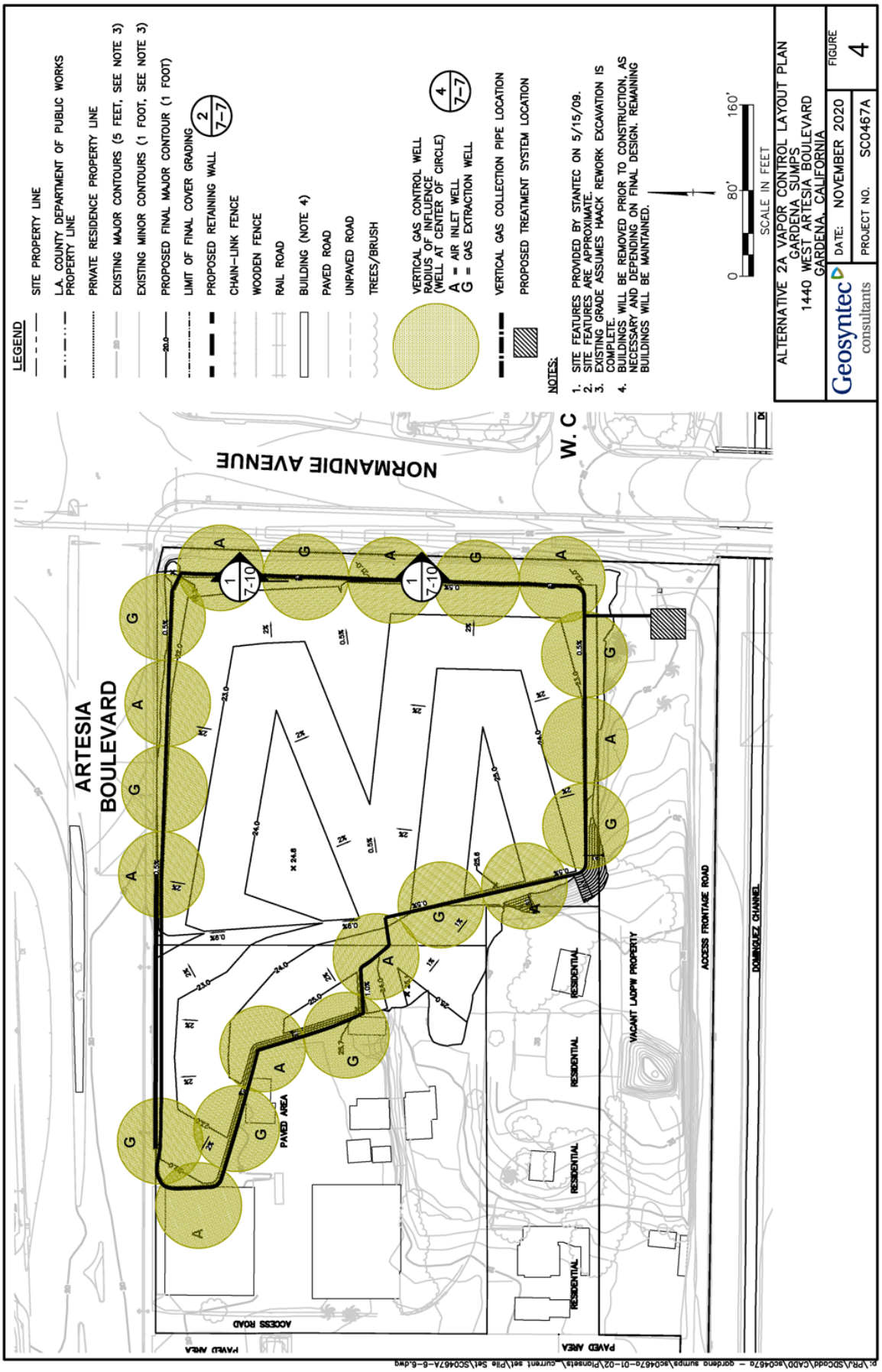

LEGEND
SITE PROPERTY LINE
L.A. COUNTY DEPARTMENT OF PUBLIC WORKS PROPERTY LINE
PRIVATE RESIDENCE PROPERTY LINE
EXISTING MAJOR CONTOURS (5 FEET, SEE NOTE 3)
EXISTING MINOR CONTOURS (1 FOOT, SEE NOTE 3)
PROPOSED FINAL MAJOR CONTOUR (1 FOOT)
LIMIT OF FINAL COVER GRADING
PROPOSED RETAINING WALL
CHAIN-LINK FENCE
WOODEN FENCE
RAIL ROAD
BUILDING (NOTE 4)
PAVED ROAD
UNPAVED ROAD
TREES/BRUSH
VERTICAL GAS CONTROL WELL RADIUS OF INFLUENCE (WELL AT CENTER OF CIRCLE)
A = AIR INLET WELL
G = GAS EXTRACTION WELL
VERTICAL GAS COLLECTION PIPE LOCATION
PROPOSED TREATMENT SYSTEM LOCATION
NOTES:
1. SITE FEATURES PROVIDED BY STANTEC ON 5/15/09.
2. SITE FEATURES ARE APPROXIMATE.
3. EXISTING GRADE ASSUMES HAACK REWORK EXCAVATION IS COMPLETE.
4. BUILDINGS WILL BE REMOVED PRIOR TO CONSTRUCTION, AS NECESSARY AND DEPENDING ON FINAL DESIGN. REMAINING BUILDINGS WILL BE MAINTAINED.
0
80'
160'
SCALE IN FEET
ALTERNATIVE 2A VAPOR CONTROL LAYOUT PLAN
GARDENA SUMPS
1440 WEST ARTESIA BOULEVARD
GARDENA, CALIFORNIA
Geosyntec consultants
DATE: NOVEMBER 2020
PROJECT NO. SC0467A
FIGURE 4
NORMANDIE AVENUE
W. C
ARTESIA BOULEVARD
PAVED AREA
ACCESS ROAD
RESIDENTIAL
VACANT LADPW PROPERTY
ACCESS FRONTAGE ROAD
DOMINGUEZ CHANNEL

TABLE OF CONTENTS

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 14. Please see the checklist beginning on page 14 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

SUMMARY OF MITIGATION

DTSC has determined that mitigation measure(s) would not be required beyond those actions incorporated as part of the Proposed Project to ensure that potential impacts would remain at a less-than-significant level.

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.

Nicholas T. Ta

Preparer's Signature	Date
	2/14/2021

Preparer's Name	Preparer's Title	Phone #
Nicholas Ta	Project Manager	(714) 484-5381

Branch Chief Signature	Date
A. Edward Morelan	February 11, 2022

Branch Chief Name	Branch Chief Title	Phone #
A. Edward Morelan, PG, CEG	Chief	(714) 484-5440

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):

California Scenic Highway Program

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.

City of Gardena 2006 General Plan

The Community Design Plan within the City of Gardena 2006 General Plan does not contain any policies related to visual character that are applicable to the proposed cleanup activities.

ENVIRONMENTAL SETTING (BASELINE):

The Project Site is located in an existing urban area of the City of Gardena at the southwest intersection of West Artesia Boulevard / South Normandie Avenue. The Project Site is a historical excavation site for clay for industrial purposes. In the 1930's, the excavations were then used for the disposal of oily hazardous wastes. This disposal continued until the late 1950's. The wastes disposed of onsite included refinery wastes, tank bottom sludges, and rinse water acids. There are four sumps onsite, two of which are visible and the other two are buried.

Visible features of the Project Site are consistent with a vacant industrial lot along with storage of commercial vehicles (part of a U-Haul storage facility). The areas surrounding the Project Site include mixed use (residential and office) located adjacent to the west and southwest, along with commercial to the north and east. Industrial uses are located to the south across the Dominguez Channel. Lastly, a sliver of residential uses extends behind commercial uses located to the east of the Project Site.

APPLICABLE THRESHOLDS OF SIGNIFICANCE:

The significance determination in this visual analysis is based on consideration of: (1) the extent of change related to visibility of the Proposed Project Site from key public vantage points; (2) the degree of visual contrast and compatibility in scale and character between project activities and the existing surroundings; (3) conformance of the proposed

project with public policies regarding visual and urban design quality; and (4) potential adverse effects on scenic vistas and scenic resources.

ENVIRONMENTAL STUDIES PERFORMED AND METHODOLOGY:

No project-specific environmental studies related to aesthetic resources were prepared for the proposed project. However, the methodology employed for assessing potential aesthetic impacts involved considering the existing viewshed and the project activities that have the potential to change the project-area visual character.

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:

The Proposed Project would implement remedial actions to address impacted soil and groundwater including excavation of the Haack Rework Area and portion of sludge overflow of the Cooper Sumps, consolidation of materials above the Cooper North and South Sumps, construction of a cap above the sumps, installation of a vapor control and monitoring system beneath the cap and around the sumps, and continuation of groundwater monitoring.

No new above ground structures or modifications to existing structures would occur with implementation of the Proposed Project. Therefore, no adverse effects on the view of the nearest scenic ridge or waterway local vantage points would occur. The nearest scenic vista (Rolling Hills of Palos Verdes) is six miles away to the south/southwest. Temporary construction activities at the Proposed Project Site would occur for approximately 4 months. The short-term construction activities would not result in any long-term adverse effects to a scenic vista.

Conclusion:

Components of the proposed remedial actions and the short-term construction activities would not have the potential to substantially affect the view of a scenic ridge or waterway. Therefore, there would be no impact.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ 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:

The nearest roadway to the Proposed Project Site that is officially designated as a California State Scenic Highway is a section of Route 27, located over 10 miles to the northwest from the Site. The nearest roadway to the Proposed Project Site that is identified as eligible for California State Scenic Highway Program is a segment of Highway 1, located over 10 miles to the southeast from the Site (CalTrans, 2021). There are no views of the Proposed Project Site from these sections of Route 27 or Highway 1.

The Proposed Project Site has been used for industrial purposes for over a half century and currently is used for ongoing as vacant land and industrial uses. No scenic resources would be damaged with implementation of the proposed remedial actions.

Conclusion:

Scenic resources (e.g., trees, rock outcroppings, historic buildings) would not be disturbed or damaged through implementation of proposed remedial actions. Implementation of the proposed project would not result in any impacts to scenic resources.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ 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:

Publicly accessible vantage points of the Proposed Project Site include adjacent roadways of West Artesia Boulevard and South Normandie Avenue along with the Dominguez Channel. The Proposed Project Site has been used historically for waste disposal and commercial vehicle storage and the visual character of the Proposed Project Site currently reflects the Site's long-term uses.

Construction activities would occur for approximately four months at the Proposed Project Site. Even though implementation of the proposed remedial actions would alter the visual character or quality of the Proposed Project Site, the remedial actions would result in improving the existing visual quality of the Site. Specifically, implementation of remedial actions to address impacted soil and groundwater (i.e., sludge excavation, materials consolidation, cap construction) would remove views of the existing sludge and temporary plastic covering from offsite locations.

Conclusion:

Based on the temporary nature of the construction activities and the overall improved end-state of the Proposed Project Site, no impact related to substantially degrading the existing visual character or quality of public views of the Proposed Project Site would occur.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ 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 Proposed Project activities would be conducted during daytime hours with the potential for some work to occur after sunset. The proposed project would not require any night-shift or swing-shift work. The nearest sensitive receptor (i.e., residences) is located across South Normandie Avenue and adjacent to the west of the Proposed Project Site. Any nighttime lighting used during construction activities would be occasional and limited to a relatively small work area and would not introduce any new temporary or permanent sources of substantial light or glare that would adversely affect daytime or nighttime views in the area.

Conclusion:

Project activities would not require nor introduce a new temporary or permanent source of substantial light or glare that would adversely affect views in the project area. Therefore, implementation of the proposed remedial actions would result in a less-than-significant impact.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☒ Less Than Significant Impact

☐ No Impact

References Used:

California Department of Transportation. 2021. California Scenic Highway Program. https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways (Accessed April 2021).

City of Gardena. 2006. City of Gardena General Plan. https://www.cityofgardena.org/general-plan/ (Accessed April 2021).

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):

No laws, ordinances, regulations, or standards protecting agriculture or forestry resources are applicable to the Proposed Project.

ENVIRONMENTAL SETTING (BASELINE):

The Proposed Project Site is not located in or near any agricultural or forestry resources. The Proposed Project Site has been used continuously since 1930s for waste storage and has active commercial vehicle storage.

APPLICABLE THRESHOLDS OF SIGNIFICANCE:

The list of agriculture or forestry resource effects that may be considered significant contained in Appendix G of the CEQA Guidelines (Environmental Checklist) was used to establish a threshold of significance.

ENVIRONMENTAL STUDIES PERFORMED AND METHODOLOGY:

Based on the lack of agricultural or forestry resources in or near the Proposed Project Site, no environmental studies relating to agriculture or forestry resources were prepared for the Proposed Project.

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:

The closest designated Farmland is approximately 17 miles from the Proposed Project Site (DRLP, 2021). Project-related activities would remain within the Proposed Project Site boundaries. Therefore, no impact to designated Farmland would occur.

Conclusion:

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

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

Impact Analysis:

The Proposed Project Site is not located in a Non-Participating County for the Williamson Act or Program (DLRP, 2017). Therefore, project-related activities would not conflict with any Williamson Act contracts. The Proposed Project Site is zoned for Industrial and Vacant uses and would not conflict with any existing agricultural zoning. No impact would occur.

Conclusion:

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ 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:

There is no land with existing zoning of forest land or timberland within the Proposed Project Site. Proposed Project-related activities would not conflict with existing zoning or cause rezoning of forest land or timberland, as none exists within the Proposed Project Site boundaries. Therefore, there would be no impact to forest land or timberland.

Conclusion:

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

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

Impact Analysis:

There are no forests or timberland on or near the Proposed Project Site and the Proposed Project would not convert any land to forest or timberland (CCC, 2005). Therefore, there would be no impact.

Conclusion:

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ 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 Proposed Project would not conflict with existing zoning for, or cause rezoning of, forest land, timberland, or agricultural land. Therefore, there would be no impact.

Conclusion:

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

References Used:

California Department of Conservation, Division of Land Resource Protection (DLRP). 2021. California Important Farmland Finder. https://maps.conservation.ca.gov/DLRP/CIFF/ (Accessed April 2021)

DLRP. 2017. The Williamson Act Status Report 2016-17. https://www.conservation.ca.gov/dlrp/wa/Documents/stats_reports/2018%20WA%20Status%20Report.pdf (Accessed April 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):

Federal Regulations

- Clean Air Act (1970)—The Environmental Protection Agency (EPA) is responsible for implementing most aspects of the Clean Air Act, including setting National Ambient Air Quality Standards (NAAQS) for major air pollutants; setting hazardous air pollutant (HAP) standards; approving state attainment plans; setting motor vehicle emission standards; issuing stationary source emission standards and permits; and establishing acid rain control measures, stratospheric O_3 protection measures, and enforcement provisions. Under the Clean Air Act, NAAQS are established for the following criteria pollutants: O_3, CO, NO_2, SO_2, PM_{10}, $PM_{2.5}$, and lead. The NAAQS describe acceptable air quality conditions designed to protect the health and welfare of the citizens of the nation. States with areas that exceed the NAAQS must prepare a state implementation plan that demonstrates how those areas will attain the standards within mandated time frames.
- Hazardous Air Pollutants—The 1977 federal Clean Air Act amendments required EPA to identify national emission standards for hazardous air pollutants to protect public health and welfare. HAPs include certain volatile organic chemicals, pesticides, herbicides, and radionuclides that present a tangible hazard, based on scientific studies of exposure to humans and other mammals.

State Regulations

- California Clean Air Act—the Federal Clean Air Act delegates the regulation of air pollution control and the enforcement of the NAAQS to the states. In California, the task of air quality management and regulation has been legislatively granted to California Air Resources Board (CARB), with subsidiary responsibilities assigned to air quality management districts and air pollution control districts at the regional and county levels. CARB has established California Ambient Air Quality Standards (CAAQS), which are generally more restrictive than the NAAQS. Air quality is considered “in attainment” if pollutant levels are continuously below the CAAQS and violate the standards no more than once each year. The NAAQS and CAAQS are presented in Table 9, “Ambient Air Quality Standards.”
- Air Toxics Program—the California TAC list identifies more than 700 pollutants, of which carcinogenic and non-carcinogenic toxicity criteria have been established for a subset of these pollutants pursuant to the California Health and Safety Code. The Legislature enacted the Air Toxics “Hot Spots” Information and Assessment Act of 1987 (AB 2588) to address public concern over the release of TACs into the atmosphere. AB 2588 law requires facilities emitting toxic substances to provide local air pollution control districts with information that will allow an assessment of the air toxics problem, identification of air toxics emissions

sources, location of resulting hotspots, notification of the public exposed to significant risk, and development of effective strategies to reduce potential risks to the public over 5 years.

Local Regulations

- The South Coast Air Quality Management District (SCAQMD) published their Air Quality Significance Thresholds in April 2019. The purpose of their thresholds is to assist lead agencies in evaluating air quality impacts of projects and plans proposed in the Los Angeles Air Basin. The SCAQMD provides a CEQA Air Quality Handbook to assist the CEQA practitioner in conducting an air quality analysis (SCAQMD 2021). In this section, air quality is evaluated against numbers set forth in the SCAQMD guidance.

ENVIRONMENTAL SETTING (BASELINE):

The climate of South Coast Air Basin is a year-round mild-to-hot and mostly dry climate for the Los Angeles metropolitan area. The climate is classified as a Mediterranean climate, which is a type of dry subtropical climate. It is characterized by seasonal changes in rainfall—with a dry summer and a rainy winter season.

The South Coast Air Basin has a hot-summer Mediterranean climate with hot, dry summers and mild-to-warm winters with increased precipitation. While the typical dry-summer and wet-winter pattern typical of most Mediterranean climates is part of the climate of the South Coast Air Basin, precipitation annually is lower than in many typical Mediterranean climates, giving it semi-arid characteristics.

Average high temperatures are in the lower 80's Fahrenheit (F) with overnight lows in the lower 60's F. During this season there is essentially no rainfall, and both July and August average less than 0.05 of an inch of monthly precipitation. The winter wet season normally runs from November through April. The normal seasonal rainfall measured at downtown Los Angeles is 14.77 inches of which 92% falls between November 1 and April 30. While there is a great increase in rainfall in the winter months, the winter months in Los Angeles are still frequently sunny and pleasant with mild-to-warm temperatures with average highs range from the upper 60's F to lower 70's F with cooler overnight lows in the upper 40's and lower 50's F.

Many industrial facilities, including chemical plants and refineries that generate emissions, are located within the South Coast Air Basin. Although pollution levels in the basin are often reduced due to prevailing marine winds from the west, operations at these industrial facilities can result in short-term elevated emissions of pollutants, making buffer zones around the facilities important. Receptors residing downwind of these facilities may be more exposed to pollutants for longer periods than receptors residing elsewhere.

The South Coast Air Basin is in attainment for National Ambient Air Quality Standards (NAAQS) and the California Ambient Air Quality Standards (CAAQS) for the following pollutants: carbon monoxide, nitrogen dioxide, sulfur dioxide, sulfates, hydrogen sulfide, and vinyl chloride. The South Coast Air Basin is in non-attainment for lead, fine particulate matter less than 2.5 microns in size ($PM_{2.5}$) and ozone with respect to both NAAQS and CAAQS. In addition, the South Coast Air Basin is in non-attainment with respect to the CAAQS for respirable particulate matter less than 10 microns in size (PM_{10}) (SCAQMD, 2016).

As previously mentioned, the Proposed Project Site is located within the South Coast Air Basin and the SCAQMD is primarily responsible for enforcing air quality standards, in accordance with standards set by the California Air Resources Board (CARB) and the United States Environmental Protection Agency.

APPLICABLE THRESHOLDS OF SIGNIFICANCE:

The 2019 SCAQMD Air Quality Significance Thresholds for average daily air emissions are shown in Table 3.1 below. If project-related average daily emissions are below these thresholds, the impacts are considered less than significant, even if peak days have emissions over the thresholds.

TABLE 3.1

THRESHOLDS OF SIGNIFICANCE FOR CONSTRUCTION-RELATED CRITERIA AIR POLLUTANTS AND PRECURSORS

Criteria Pollutant or Precursor	Average Daily Emissions Threshold of Significance (pounds/day)
NOx	100
VOC	75
PM_{10}	150
$PM_{2.5}$	55

SOx	150
CO	550
Lead	3

Notes:
NOx = nitrogen oxide
VOC = volatile organic compound
PM_{10} = particulate matter less than 10 microns in size
$PM_{2.5}$ = particulate matter less than 2.5 microns in size
SOx = sulfur oxide
CO = carbon monoxide

ENVIRONMENTAL STUDIES PERFORMED AND METHODOLOGY:

California Emissions Estimator Model ® (CalEEMod, Version 2016.3.2) was run to determine if project-related air emissions exceed SCAQMD Air Quality Significance Thresholds. The CalEEMod results are summarized in Table 3.2 below, and the model basis information is summarized in Attachment A. Complete CalEEMod Input and Output is provided in Attachment A. The following construction equipment was considered in modeling air emissions:

- On-road trucks (worker transportation),
- Forklifts,
- Loaders,
- Pavers,
- Rollers,
- Excavators,
- Grader,
- Rubber tire dozer,
- Backhoes, and
- Generator.

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:

Construction-related activities would result in emissions of ozone precursors (NOx and reactive organic gases [ROG]), particulates (PM_{10} and $PM_{2.5}$), air toxics, and greenhouse gases (project-related greenhouse gas emissions are analyzed separately in Section 8 of this Initial Study/Negative Declaration). Emissions for construction activities associated with implementing the proposed remedial actions were performed in accordance with the April 2019 SCAQMD Air Quality Significance Thresholds, using the California Emissions Estimator Model ® (CalEEMod, Version 2016.3.2) and the results are shown in Table 3.2 below. The CalEEMod Input and Output model results are provided in Attachment A.

TABLE 3.2

THRESHOLDS OF SIGNIFICANCE FOR CONSTRUCTION-RELATED CRITERIA AIR POLLUTANTS AND PRECURSORS

Criteria Pollutant or Precursor	SCAQMD Average Daily Emissions Threshold of Significance (lb/day)	Estimated Unmitigated Proposed Project Maximum Daily Emissions (lb/day)	Is Threshold of Significance Exceeded?
NOx	100	1.76	NO
VOC	75	0.20	NO
PM_{10}	150	0.31	NO
$PM_{2.5}$	55	0.20	NO
SOx	150	0.003	NO
CO	550	1.91	NO
Lead	3	N/A	N/A

Notes:
Lb = pounds
NOx = nitrogen oxide
VOC = volatile organic compound
PM_{10} = particulate matter less than 10 microns in size
$PM_{2.5}$ = particulate matter less than 2.5 microns in size
SOx = sulfur oxide
CO = carbon monoxide

As shown in Table 3.2, project-related construction activities would generate air emissions below 2019 SCAQMD Air Quality Significance Thresholds for construction impacts (SCAQMD 2019).

The proposed project would also require the preparation and implementation of a Dust Control Plan to ensure the construction activities would comply with the SCAQMD Regulation 6 requirements for PM_{10} and visible dust emissions. Specifically, the proposed project would include best management practices (BMPs) that would conform to the SCAQMD CEQA Guidelines to reduce emissions from construction equipment which include:

- Using alternative fueled construction equipment when available,
- Minimizing idling time to a maximum of 5 minutes,
- Maintaining properly tuned equipment, and
- Limiting the hours of operation of heavy-duty equipment and/or the amount of equipment in use.

In addition, the following measures may be implemented to reduce the emissions from heavy duty trucks, as appropriate.

- Using cleaner fueled vehicles, when available;
- Using particulate traps and catalytic oxidizers, when available; and/or
- Choosing a haul route that provides the maximum buffer to sensitive receptors (e.g., pre-schools, nursing homes).

Conclusion:

The CalEEMod results indicate that the project-related emissions would be below the 2019 SCAQMD Air Quality Significance Thresholds for construction projects. The short-term construction activities of the proposed project and implementation of appropriate and feasible control strategies (e.g., dust control plan, BMPs) would not conflict with or obstruct implementation of the SCAQMD Air Quality Management Plan. Therefore, project impacts are considered less than significant.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☒ Less Than Significant Impact

☐ 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 Proposed Project Site is non-attainment for ozone, PM_{10}, and $PM_{2.5}$ (SCAQMD, 2016). As shown in Table 3.2 above, the Proposed Project-related emissions of these pollutants would not exceed any of the thresholds of significance established in the 2019 SCAQMD Air Quality Significance Thresholds.

Health Effects of Criteria Air Pollutants

Reactive organic gases (ROG) and nitrous oxides (NO_x) are precursors to ozone (O_3), for which the South Coast Air Basin (SCAB) is designated as nonattainment with respect to the NAAQS and CAAQS. The health effects associated with O_3 are generally associated with reduced lung function. The contribution of ROG and NO_x to regional ambient O_3 concentrations is the result of complex photochemistry. The increases in O_3 concentrations in the SCAB due to O_3 precursor emissions tend to be found downwind from the source location to allow time for the photochemical reactions to occur. However, the potential for exacerbating excessive O_3 concentrations would also depend on the time of year that the ROG emissions would occur because exceedances of the O_3 NAAQS and CAAQS tend to occur between April and October when solar radiation is highest. The holistic effect of a single project's emissions of O_3 precursors is speculative due to the lack of quantitative methods to reliably and meaningfully assess this impact. Thus, a project's ROG and NOx emissions are evaluated in the context of the NSAQMD significance thresholds, which define the levels of emissions that can occur without causing or contributing to violations of the NAAQS or CAAQS. In turn, the NAAQS and CAAQS define the pollutant concentrations above which adverse health effects are expected to occur. Nonetheless, because ROG and NO_x emissions associated with project construction would be potentially significant before mitigation, the project could minimally contribute to regional O_3 concentrations and the associated health effects.

Health effects related to particle pollution (PM_{10} and $PM_{2.5}$), Health studies have shown a significant association between exposure to particle pollution and health risks, including premature death. Health effects may include cardiovascular effects such as cardiac arrhythmias and heart attacks, and respiratory effects such as asthma attacks and bronchitis. Exposure to particle pollution can result in increased hospital admissions, emergency room visits, absences from school or work, and restricted activity days, especially for those with pre-existing heart or lung disease, older people, and children. The size of particles is directly linked to their potential for causing health problems. Fine particles ($PM_{2.5}$) pose the greatest health risk. These fine particles can get deep into lungs, and some may even get into the bloodstream. Exposure to these particles can affect a person's lungs and heart. Coarse particles ($PM_{10\text{-}2.5}$) are of less concern, although they can irritate a person's eyes, nose, and throat.

Conclusion:

Construction activities associated with implementing the proposed project would generate emissions of non-attainment pollutants that are below the thresholds of significance identified in the 2019 SCAQMD Air Quality Significance Thresholds. Therefore, implementation of the proposed project would result in a less-than-significant impact to the net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☒ Less Than Significant Impact

☐ No Impact

c. Expose sensitive receptors to substantial pollutant concentrations?

Impact Analysis:

The California Air Resources Board (CARB) defines sensitive receptors as children, elderly, asthmatics, or others who are at a heightened risk of negative health outcomes due to exposure to air pollution. For the purposes of this analysis, the locations where these populations can typically congregate (e.g., schools, hospitals) are considered sensitive receptor locations. Remedial actions associated with implementing the proposed project would take place in an area zoned for Mixed Use Overlay as part of the Artesia Corridor

Specific Plan to develop an existing underutilized brownfield commercial and industrial site into a mixed-use development. The closest sensitive receptor (Gardena High School) is located ¼ miles to the southeast of the Proposed Project Site.

The proposed remedial actions will perform air monitoring at the working areas and up- and down-wind areas near the Site perimeter. Dust will be monitored with particulate monitors while volatile organic compounds (VOCs) will be monitored with photoionization detectors (PIDs). Additional actions will be implemented, as necessary, such as the use of vapor suppression foams, soil, plastic sheeting, and/or spray-applied covers, to prevent exposing offsite sensitive receptors to onsite activities.

Conclusion:

A school is located within ¼ mile from the Proposed Project Site. Implementation of dust monitoring and dust minimization actions will keep potential impacts of exposing sensitive receptors to pollutant concentrations at a less-than-significant level.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☒ Less Than Significant Impact

☐ No Impact

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

Impact Analysis:

Implementation of proposed remedial actions have the potential to generate odors during the operation of construction equipment, such as those experienced from diesel engine exhaust. The closest receptor of odors are residences located adjacent to the Proposed Project Site.

The proposed remedial actions will perform air monitoring at the working areas and up- and down-wind areas near the Site perimeter. Odors, such as those indicating hydrogen sulfide or sulfur dioxide, will be monitored with personal indicator badges. Nuisance odors will be evaluated by an onsite, trained individual.

Conclusion:

Project-related odors during construction activities would be actively monitored to ensure no discernable odors are experienced by the closest receptors (i.e., residences). Therefore, implementation of the remedial actions would not result in emissions that could adversely affect a substantial number of people.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☒ Less Than Significant Impact

☐ No Impact

References Used:

South Coast Air Quality Management District (SCAQMD). 2021. Air Quality Analysis Handbook. http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook (Accessed May 25, 2021)

SCAQMD. 2016. National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS) Attainment Status for South Coast Air Basin.

SCAQMD. 2019. SCAQMD Air Quality Significance Thresholds. April 2019.

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):

Applicable statutes and regulations to the Proposed Project include:

Federal Endangered Species Act (ESA): (16 United States Code (USC) § 1531-1544, 50 Code of Federal Regulations (CFR) Part 17). The Federal ESA provides a program for the conservation of threatened and endangered plants and animals and the habitats in which they are found.

Federal Migratory Bird Treaty Act (MBTA): (16 USC § 703-712, 50 CFR Part 21). The MBTA makes it illegal to take, possess, import, export, transport, sell, purchase, barter, or offer for sale, purchase, or barter, any migratory bird, or the parts, nests, or eggs of such a bird except under the terms of a valid Federal permit.

California Endangered Species Act (CESA): (Fish and Game Code (FGC) chapter 1.5, sections 2050-2115.5, California Code of Regulations (CCR), title 14, chapter 6, § 783.0-787.9). CESA protects or preserves all native species of fishes, amphibians, reptiles, birds, mammals, invertebrates, and plants, and their habitats, threatened with extinction and those experiencing a significant decline which, if not halted, would lead to a threatened or endangered designation.
CESA states that all native species of fishes, amphibians, reptiles, birds, mammals, invertebrates, and plants, and their habitats, threatened with extinction and those experiencing a significant decline which, if not halted, would lead to a threatened or endangered designation, will be protected or preserved.

Additionally, the California FGC § 3503 prohibits the take, possession, or needless destruction of the nest or eggs of any bird; and § 3513 prohibits the take or possession of any migratory nongame bird or part there of as designated in the MBTA. Any birds in the orders Falconiformes or Strigiformes (birds of prey, such as hawks and owls) are protected under FGC 3503.5, which makes it unlawful to take, posses, or destroy their nest or eggs.

ENVIRONMENTAL SETTING (BASELINE):

The Proposed Project Site is surrounded by urban uses. There are no wetlands on the Proposed Project Site.

APPLICABLE THRESHOLDS OF SIGNIFICANCE:

The list of biological resource effects that may be considered significant contained in Appendix G of the CEQA Guidelines (Environmental Checklist) was used to establish a threshold of significance.

ENVIRONMENTAL STUDIES PERFORMED AND METHODOLOGY:

Reconnaissance-level biological resources surveys were not conducted because of the urban nature of the Proposed Project Site and nearby areas.

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:

Urban development surrounding the Proposed Project Site and other activities in the general project vicinity has reduced or, in some cases, eliminated connectivity to undisturbed natural habitats in the area. However, some animals have adapted to these types of conditions and are expected to traverse the Proposed Project Site such as raptors and other birds protected by the MBTA and California FGC Code. However, the Proposed Project Site does not contain any habitat suitable for foraging or nesting and implementation of remedial actions would not result in direct disturbance of any biological habitat. There would be no impact to special status species.

Conclusion:

The Proposed Project Site does not contain any suitable habitat for foraging or nesting of special status species. Therefore, proposed remedial actions would not have the potential to adversely affect special status species.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ 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 Proposed Project Site does not contain any riparian habitat or sensitive natural community. The Site is completely disturbed and is surrounded by a developed, urban area. Implementation of remedial actions would not result in direct disturbance of any riparian habitat or sensitive natural community. There would be no impact.

Conclusion:

Riparian habitat is not located on the Proposed Project Site and implementation of proposed remedial actions would not have the potential to effect on any riparian habitat or other sensitive natural community.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ 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:

Construction activities would not occur in any wetland areas and would only occur on the Proposed Project Site. The Site is completely disturbed and is surrounded by a developed, urban area. Implementation of remedial actions would not result in direct disturbance of any wetlands. There would be no impact.

Conclusion:

Wetlands are not located on the Proposed Project Site and implementation of remedial actions would not have the potential to affect any state or federally protected wetlands.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No 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:

Based on the temporary nature and duration of the remedial actions and the location of the Proposed Project Site, which is a heavily disturbed urban setting, the proposed project would not have the potential to interfere 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.

Conclusion:

There are no established native resident or migratory wildlife corridors, or native wildlife nursery sites located on or near the Proposed Project Site. The remedial actions would not have no impact.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

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

Impact Analysis:

There are no biological resources on the Proposed Project Site that are protected by local policies or ordinances.

Conclusion:

Implementation of the proposed remedial actions would not conflict with any local polices or ordinances for the purposes of protecting biological resources.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ 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 Proposed Project Site is not located in any adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. The Proposed Project is not in conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

Conclusion:

The proposed remedial actions would not have the potential to conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

References Used:

California Department of Fish and Wildlife (CDFW). 1971. FGC 3503. http://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?sectionNum=3503.&lawCode=FGC (Accessed November 2018).

U.S. Fish and Wildlife Service. 2019. Information for Planning and Consultation. https://ecos.fws.gov/ipac/location/FE4PMUV7LJFKZAMKSYDM4KAJDE/resources

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 definition of historical resources can be found in PRC §21084.1 and 14 CCR § 15064.5. Unique archaeological resources are defined in PRC § 21083.2 and 14 CCR § 15064.5. Tribal cultural resources are defined in PRC Div. 13 Section 21074.

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 (PRC 21081.3.1). Please refer to Section 18, Tribal Cultural Resources, of this Initial Study for additional discussion.

If remains are found on Site, the County Coroner will make the determination of origin and disposition, pursuant to Public Resources Code (PRC) § 5097.98. If the remains are determined to be Native American, the Coroner would notify the NAHC (per Health and Safety Code (HSC) 7050.5(c)) The NAHC would identify and notify the person(s) who might be the most likely descendent, who would make recommendations for the appropriate and dignified treatment of the remains (PRC Div. 5 section 5097.98). The descendants shall complete their inspection and make recommendations for treatment within 48 hours of being granted access to the Site (CEQA Guidelines, CCR section 15064.5(e); HSC section 7050.5).

ENVIRONMENTAL SETTING (BASELINE):

There are numerous archaeological Sites within the Los Angeles Basin that have been recorded with the Archaeological Inventory Report, Northwest Information Center (NWIC) at California State University Sonoma (CCCCD, 2005). However, the Archaeological Inventory Report indicates the Proposed Project Site is in a largely urbanized area excluded from the archeological sensitivity survey.

APPLICABLE THRESHOLDS OF SIGNIFICANCE:

To be eligible for the California Register, a prehistoric or historic-period property must be significant at the local, state, and/or federal level under one or more of the following four criteria:

1. Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
2. Is associated with the lives of persons important in our past;
3. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or,
4. Has yielded, or may be likely to yield, information important in prehistory or history.

A resource eligible for the California Register must meet one of the criteria of significance described above and retain enough of its historic character or appearance (integrity) to be recognizable as a historical resource and to convey the reason for its significance. It is possible that a historic resource may not retain sufficient integrity to meet the criteria for listing in the National Register, but it may still be eligible for listing in the California Register.

ENVIRONMENTAL STUDIES PERFORMED AND METHODOLOGY:

Based on the lack of undisturbed areas on or near the Proposed Project Site, no environmental studies relating to cultural resources were prepared for the Proposed Project.

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:

Historical resources, as defined by 14 CCR section 15064.5, have not been identified at the Proposed Project Site. The Proposed Project Site has been used continuously for over 80 years for storage of industrial waste materials. Based on the Proposed Project Site location, history, and absence of resource findings during prior Site work, it is highly unlikely that historical resources would be identified or impacted. However, if historical resources are discovered during the Proposed Project activities, then ground disturbing activities within 25 feet would 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, ARCO, and other agencies and Native American representatives, as appropriate.

Conclusion:

The Proposed Project would not include demolition, elimination, or manipulation of a historical resource. In addition, the finding of a historical resource during implementation of the remedial actions is unlikely based on the Proposed Project Site history and conditions, and absence of findings during prior onsite work. Therefore, the Proposed Project would not cause a substantial adverse change in the significance of a known historical resource.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☒ Less Than Significant Impact

☐ No Impact

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

Impact Analysis:

Archaeological resources, as defined by 14 CCR section 15064.5, have not been identified at the Proposed Project Site. The Proposed Project Site has been used continuously for more than 80 years for storage of industrial waste materials. Based on the Proposed Project Site location, history, and absence of resource findings during prior onsite work, it is highly unlikely that archaeological resources would be identified or impacted. In addition, there is no unique geologic feature at the Site and the presence of a unique paleontological resource in the Proposed Project work area is unlikely. However, if archaeological resources are discovered during the Proposed Project activities, then ground disturbing activities within 25 feet would 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, ARCO, and other agencies and Native American representatives.

Conclusion:

The Proposed Project would not include demolition, elimination, or manipulation of an archaeological resource. In addition, the finding of an archaeological resource during implementation of the remedial actions is unlikely based on the Proposed Project Site history and conditions, and absence of findings during prior onsite work. Therefore, the Proposed Project would not cause a substantial adverse change in the significance of a known archaeological resource.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☒ Less Than Significant Impact

☐ No Impact

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

Impact Analysis:

There are no known human remains on or near the Site and given the repeated disturbance of the Site and the surrounding area, and the findings of the cultural resource study, the potential for such remains to be present is considered extremely low. If human remains are encountered, the County Coroner would be immediately notified. No further ground disturbing activities shall occur within 25 feet of the work area until the County Coroner has made a determination of origin and disposition, pursuant to PRC § 5097.98. If the remains are determined to be Native American, the Coroner would notify the NAHC (per Health and Safety Code 7050.5(c)) and the County Coordinator of Indian Affairs.

Conclusion:

Implementation of remedial actions is not expected to encounter or disturb any human remains, including those interred outside of dedicated cemeteries. If human remains are encountered, procedures will be followed to prevent disturbing the remains and ensure compliance with applicable codes and regulations.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☒ Less Than Significant Impact

☐ No Impact

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):

In 2015, Governor Brown signed Senate Bill 350 to codify climate, clean energy, and energy efficiency goals. The regulations focus on generating energy through renewable sources and increasing the energy efficiency of buildings.

ENVIRONMENTAL SETTING (BASELINE):

Electrical power and natural gas are provided to the Proposed Project Site by Southern California Edison (SCE) and Southern California Gas (SoCal Gas)respectively. SCE obtains its electricity supplies from power plants and natural gas fields in northern California and from energy purchased outside its service area and delivered through high voltage transmission lines. SoCal Gas obtains its natural gas supplies from natural gas fields in northern California and from sources outside of California.

APPLICABLE THRESHOLDS OF SIGNIFICANCE:

The list of energy resource effects that may be considered significant contained in Appendix G of the CEQA Guidelines (Environmental Checklist) was used to establish a threshold of significance.

ENVIRONMENTAL STUDIES PERFORMED AND METHODOLOGY:

Based on the lack of significant increase in energy demand from the Proposed Project Site, no environmental studies relating to energy resources were prepared for the Proposed Project.

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:

To implement the Proposed Project, it is expected that construction equipment (e.g., tractors, excavators, loaders, generators, trucks, light-duty vehicles) would use petroleum fuels (diesel and gasoline products) and would not use on-site electricity or natural gas sources. Implementation of the proposed remedial actions would occur over a short duration (4 months) and, therefore, the wasteful, inefficient, or unnecessary use of petroleum fuels would not occur. Construction contractors would use existing office space at the Proposed Project Site. Implementation of the proposed project would not result in adding any new facilities that would increase the demand for energy resources.

Conclusion:

The Proposed Project would not add new facilities that could increase the demand for energy resources. Construction activities would use equipment in accordance with manufacturer's specifications. Therefore, implementation of the proposed remedial action would not result in a wasteful, inefficient, or unnecessary consumption of energy resources. In addition, implementation of proposed remedial actions would not result in a new permanent energy demand.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☒ Less Than Significant Impact

☐ No Impact

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

Impact Analysis:

In 2015, Governor Brown signed Senate Bill 350 to codify climate, clean energy, and energy efficiency goals. The regulations focus on generating energy through renewable sources and increasing the energy efficiency of buildings. Implementation of proposed remedial actions would not result in constructing any new buildings that would increase the demand for energy resources, renewable or otherwise.

Conclusion:

The Proposed Project would not construct new facilities or permanent structures and would not generate any new energy demands. Therefore, the Proposed Project would not conflict with or obstruct any state or local plan for renewable energy or energy efficiency.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

References Used:

California Legislative Information. 2015. SB-350 Clean Energy and Pollution Reduction Act of 2015. October. https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201520160SB350 (Accessed November 2018).

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 waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☐	☒
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☐	☒

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

No laws, ordinances, regulations, or standards protecting geological or soil resources are applicable to the Proposed Project.

ENVIRONMENTAL SETTING (BASELINE):

The Site is located in the Los Angeles Coastal Plain and is underlain by a thick sequence of marine and continental sediments that were deposited in a broad synclinal depression. According to borings conducted in 1986, 1992, and 1994, sediments underlying the Site, to the maximum explored depth of 92 feet below ground surface (bgs), consist primarily of a mixture of clays and silts with interbeds of sand.

APPLICABLE THRESHOLDS OF SIGNIFICANCE:

The list of geological and soils resource effects that may be considered significant contained in Appendix G of the CEQA Guidelines (Environmental Checklist) was used to establish a threshold of significance.

ENVIRONMENTAL STUDIES PERFORMED AND METHODOLOGY:

Site lithology has been characterized through investigations completed as part of the Site investigations. Soil samples were also collected and characterized.

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 Proposed Project Site is located in an Earthquake Fault Zone; however, no known earthquake fault crosses the site (CGS, 2021). Site workers would only be present for a short duration during Proposed Project activities (4 months) and, therefore, the potential for exposure to substantial risk of injury to people would be limited. In addition, the Proposed Project includes installation of a soil cover and cap that would not expose people or structures to significant impacts from fault rupture associated effects.

Conclusion:

The Proposed Project Site is identified as being in an Earthquake Fault Zone. However, the risk of loss, injury, or death involving from onsite ruptures would be limited because of the short duration of project activities and the installation of a soil cover and cap that would reduce the potential exposure of people or structures to significant impacts from fault rupture associated effects.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☒ Less Than Significant Impact

☐ No Impact

ii) Strong seismic ground shaking?

Impact Analysis:

The Proposed Project Site is located in a seismically active area and the site may be exposed to moderate to strong shaking in the event of an earthquake in the region (CGS, 2021).

Implementation of remedial actions would require the use of heavy equipment and would place numerous workers onsite. Site workers would only be present for approximately 4 months; therefore, the potential for substantial risk or injury to people from seismic ground shaking would be limited. In addition, the Proposed Project includes installation of a soil cover and cap that would not expose people or structures to significant impacts from strong seismic ground shaking if it were to occur.

Conclusion:

Even though the Proposed Project Site is in a seismically active area and the site may be exposed to moderate to strong shaking if an earthquake occurred, the Proposed Project activities would occur outdoors away from any structures. Therefore, the risk of loss, injury, or death from strong seismic ground shaking would be negligible.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☒ Less Than Significant Impact

☐ No Impact

iii) Seismic-related ground failure, including liquefaction?

Impact Analysis:

The Proposed Project Site is located in a Liquefaction Zone and, therefore, has a high liquefaction susceptibility (CGS, 2021). Due to liquefaction, which generally occurs at depths shallower than 50 ft-bgs, soils may lose their ability to support structures. However, proposed remedial actions would not involve building new structures.

Site workers would only be present for the short project duration (4 months), therefore the potential for substantial risk or injury to people would be limited. In addition, the Proposed Project includes installation of a soil cover and cap that would not expose people or structures to significant impacts from seismic-related ground failure, including liquefaction.

Conclusion:

Even though the Proposed Project Site is in a high liquefaction susceptible area, remedial actions would not involve activities that would place buildings or people at risk of loss, injury, or death at significant risk if liquefaction.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☒ Less Than Significant Impact

☐ No Impact

iv) Landslides?

Impact Analysis:

The Proposed Project Site is not located in an area that could be adversely affected by landslides (CDC, 2021). In addition, the proposed corrective actions would be performed on a flat area and there is little potential for substantial risk or injury from landslides.

Conclusion:

No landslide impacts from the on the Site or nearby areas would occur relating to placing people or buildings at risk loss, injury, or death involving landslides.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

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

Impact Analysis:

The proposed cap would decrease the amount of potential soil erosion by preventing storm water runoff contact and water intrusion into the soil. The proposed cap would also be graded to direct runoff to onsite drainage features to reduce storm water runoff and soil erosion. In addition, the proposed project would obtain a grading permit from the City of Gardena before commencement of remedial actions.

Conclusion:

Design of the proposed remedial actions (i.e., cap) would limit the potential for soil erosion or loss of topsoil on the Proposed Project Site. Impacts related to soil erosion and loss of topsoil would be less than significant.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☒ Less Than Significant Impact

☐ 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:

The Proposed Project Site is flat with very little relief therefore the potential for slope instability, lateral spreading, or collapse are minimal. The soils beneath the Proposed Project Site would not be subject to subsidence because remedial actions would not involve the removal of groundwater.

In addition, remediation of the Proposed Project Site would not involve any activities that could result in liquefaction of existing onsite soils or imported soils (process by which saturated, unconsolidated soil or sand is converted into a suspension during an earthquake). The vibrations associated with the proposed work would be incapable of approximating those necessary to cause liquefaction.

Conclusion:

Characteristics of existing soils on the Proposed Project Site would not be unstable or become unstable as a result of implementing the proposed project. This would be considered a less-than-significant impact.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☒ Less Than Significant Impact

☐ 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:

Expansive soils are characterized by their ability to undergo volume change due to variations in moisture content. The Proposed Project Area is located on an area underlain by clay. Clay is a type of soil type exhibits expansive characteristics (Geology, 2021). However, implementation of proposed remedial actions would not involve construction of new structures or facilities. Engineering considerations have been incorporated into the design of the remedial actions including compaction of materials prior to construction of the cap.

Conclusion:

Proposed remedial actions would not result in any new structures or facilities being placed on expansive soils. In addition, remedial actions have been engineered to consider compaction of materials prior to construction of the cap. Therefore, substantial risk to life or property from expansive soils would be less than significant.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☒ Less Than Significant Impact

☐ 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:

The proposed project activities would not require the use of septic tanks or alternative wastewater disposal systems nor involve construction of such new systems.

Conclusion:

The use or construction of septic tanks or alternative wastewater disposal systems are not part of the proposed remedial actions. No impact involving septic tanks or alternative wastewater disposal systems as a result of onsite soils would occur.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

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

Impact Analysis:

The Proposed Project Site has been used continuously for sludge storage for the past 70 years. There are no unique geologic features at the Site and the presence of a unique paleontological resource in the Proposed Project work area is unlikely. This is because work would primarily occur above the existing grade or within the upper 5 feet, which is primarily comprised of sludge. The Proposed Project is not expected to encounter or destroy any unique paleontological resources or geological features.

Conclusion:

There is no unique geologic feature at the Site and the presence of a unique paleontological resource in the Proposed Project work area is unlikely.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

References Used:

Geology.com https://geology.com/articles/expansive-soil.shtml

California Department of Conservation, California Geological Survey (CGS). 2021. Earthquake Zones of Required Investigation. https://maps.conservation.ca.gov/cgs/EQZApp/app/ (Accessed April 21, 2021).

International Conference of Building Officials. 1994. Uniform Building Code, Seventh Printing. May 1.

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 South Coast Air Quality Management District (SCAQMD) 2019 Air Quality Significance Thresholds recommend that greenhouse gases (GHGs) for projects be quantified and that the lead agency should make a determination on the significance of construction-related GHG emissions.

ENVIRONMENTAL SETTING (BASELINE):

Greenhouse gases are global pollutants, unlike criteria air pollutants that are of regional or local concern. The largest anthropogenic source of GHGs is the combustion of fossil fuels, which results primarily in emissions of carbon dioxide (CO_2). Other GHGs include methane, nitrous oxide, fluorinated gases, ozone, and sulfur hexafluoride. To account for the differences of the warming effects of various GHGs, emissions are standardized into carbon dioxide equivalents (CO_2e).

A GHG emissions inventory is available for the SCAQMD area for 2009 (SCAQMD, 2021). In 2009, approximately 5,928 metric tons (MMT) CO_2e were attributable to the SCAQMD area. Mobile sources contributed 672 MMT, stationary combustion sources contributed 2,042 metric tons, and purchased electricity contributed 3,212 MMT.

APPLICABLE THRESHOLDS OF SIGNIFICANCE:

The SCAQMD Air Quality Significance Thresholds identify an operation-related maximum annual threshold of significance for industrial facility projects of 10,000 metric tons of CO_2e per year (SCAQMD, 2019).

ENVIRONMENTAL STUDIES PERFORMED AND METHODOLOGY:

California Emissions Estimator Model ® (CalEEMod, Version 2016.3.2) was run to identify project-related greenhouse gas emissions (BREEZE, 2017). The CalEEMod results and the model basis information are provided in Attachment A.

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:

Implementation of proposed remedial actions would generate GHG emissions through mobilization of construction equipment; onsite delivery of materials, equipment and supplies; offsite shipment of waste materials; onsite use of vehicles and heavy equipment; worker commutes to the Proposed Project Site; and demobilization activities. The CalEEMod was run to identify the potential greenhouse gas emissions generated by implementation of proposed remedial actions. Results of the model indicate that remedial actions would generate approximately 50 metric tons of CO_2e per year during the construction period (Attachment A). Carbon dioxide equivalent, or CO_2e, is a term for

describing different greenhouse gases in a common unit. For any quantity and type of greenhouse gas, CO_2e signifies the amount of CO_2 which would have the equivalent global warming impact (Ecometrica 2012).

Although the SCAQMD Air Quality Significance Thresholds do not provide a construction-related threshold of significance for GHG emissions, construction-related CO_2e emissions were compared to operation-related maximum annual threshold of significance for industrial facility projects. Construction activities associated with implementation of remedial actions would generate approximately 50 metric tons of CO_2e per year. This amount of CO_2e falls below the SCAQMD Air Quality Significance Thresholds operation-related maximum annual threshold of significance for industrial facilities of 10,000 metric tons of CO_2e per year.

Conclusion:

The proposed project would not result in a new permanent stationary or non-stationary source of GHGs and construction-related GHG emissions would be short-term and temporary. In addition, the estimated CO_2e emissions from implementing the remedial actions (50 metric tons of CO_2e per year) would fall below SCAQMD Air Quality Significance Thresholds operation-related maximum annual threshold of significance for industrial facility projects (10,000 metric tons of CO_2e per year). Therefore, GHG emissions resulting from implementation of the proposed project are considered to have a less-than-significant impact on the environment.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☒ Less Than Significant Impact

☐ No Impact

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

Impact Analysis:

The SCAQMD is responsible for regulating GHG emissions in the project area. The SCAQMD 2019 Air Quality Significance Thresholds identify an operation-related maximum annual threshold of significance for industrial facility projects of 10,000 metric tons of CO_2e per year. However, construction-related CO_2e emissions were compared to operation-related maximum annual threshold of significance for industrial facility projects. Construction activities associated with implementation of remedial actions would generate approximately 50 metric tons of CO_2e per year. This amount of CO_2e falls below the SCAQMD Air Quality Significance Thresholds operation-related maximum annual threshold of significance for industrial facilities of 10,000 metric tons of CO_2e per year.

Conclusion:

The operation of construction equipment during implementation of remedial actions at the Proposed Project Site would be short-term and temporary and would not conflict with any applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases. All remedial actions would be performed in compliance with the SCAQMD rules and polices. No impact related to conflict with a GHG reduction plan would occur.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

References Used:

South Coast Air Quality Management District (SCAQMD). 2009. SCAQMD's GHG Emissions, Climate Change. https://www.aqmd.gov/nav/about/initiatives/climate-change/scaqmd's-ghg-emissions (Accessed April 22, 2021).

SCAQMD. 2019. SCAQMD Air Quality Significance Thresholds. April 2019.

BREEZE Software. 2017. California Emissions Estimator Model ®, Version 2016.3.2. http://www.caleemod.com/ (Accessed May 2021).

California Air Resources Board. 2006. Assembly Bill No. 32. September 27.

Ecometrica 2012. Greenhouse Gases, CO_2, CO_2e, and Carbon: What Do All These Terms Mean? August 2012. Matthew Brander

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):

Federal laws and regulations:

- Resource Conservation and Recovery Act (RCRA) Title 42 United States Code and 40 Code Federal Regulations (CFR) Parts 260-279. More specifically, hazardous waste generators are governed by 40 CFR part 262, subpart E and transporters of hazardous waste governed by 40 CFR part 263. RCRA gives EPA the authority to control hazardous waste from the generation, transportation, treatment, storage, and disposal of hazardous waste. RCRA also set forth a framework for the management of non-hazardous solid waste.

- The U.S. Department of Transportation Pipeline and Hazardous Materials Safety Administration regulates the transport of hazardous materials through Title 49 of the Code of Federal Regulations, Subchapter C.

State laws and regulations:

- Hazardous Waste Control Law (Health and Safety Code (HSC) Chapter 6.5) and 22 California Code of Regulations (CCR). The law establishes regulations and incentives which ensure that the generators of hazardous

waste employ technology and management practices for the safe handling, treatment, recycling, and destruction of their hazardous wastes prior to disposal. Article 6 of HSC Chapter 6.5 discusses the transportation of hazardous waste.

- California Vehicle Code: Divisions 2, 6, 12, 13, 14, 15 also apply to transportation of hazardous materials.

ENVIRONMENTAL SETTING (BASELINE):

Since the Site was identified by the DTSC in 1981, three removal actions have been performed. The following section summarizes the removal actions completed at the Site.

1993-1994 Interim Cover

In 1993, the DTSC prepared an Engineering Evaluation/Cost Analysis Report (EECAR) for the Site with the objective of preventing human dermal contact with the sludge. Between 14 June and 6 August 1993, the removal action was implemented. The interim cover was constructed to prevent dermal contact with the sludge over an area of approximately 114,000 square feet (sf).

Between 10 January and 24 January 1994, a layer of clean fill dirt was placed above exposed areas of sludge on the Southern Pacific Railroad right-of-way to the east. Additionally, a fence was installed around an approximately 12,000 sf portion of the Southern Pacific Railroad right-of-way bordering the Site.

1998 Haack Property Cover

As part of the legal settlement between the DTSC and Mr. Clarence Haack (Haack property owner), DTSC Docket #91/92-012, Mr. Haack was responsible for abating the risk to human health from the sludge on his property. A cover was constructed, reportedly consists of a 6-mil thick visqueen vapor barrier, with 2 inches of sand above and below to provide protection, and a concrete cap. The concrete cap included steel reinforcement within a minimum 6-inch-thick slab.

2013 Additional Cover

In August 2013. The new 45-mil reinforced polypropylene (RPP) geomembrane material was hot air welded along internal seams and seam taped and hot air welded to the underlying original geomembrane along the perimeter of the existing cover by Barber-Webb Co., Inc (BW).

The human health risk assessment concluded the primary risk driving chemicals to include:

Soil: arsenic, hexavalent chromium, naphthalene, and the benzo(a)pyrene;

Air: benzene, hydrogen sulfide; and

Groundwater: dibenz(a,h)anthracene.

APPLICABLE THRESHOLDS OF SIGNIFICANCE:

The list of hazards and hazardous materials effects that may be considered significant contained in Appendix G of the CEQA Guidelines (Environmental Checklist) was used to establish a threshold of significance**.**

ENVIRONMENTAL STUDIES PERFORMED AND METHODOLOGY:

Human health and ecological risk assessments performed for the Proposed Project Site are summarized in the Draft Remedial Action Plan, Gardena Sumps (Geosyntec Consultants, 2021).

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:

Hazardous materials used during implementation of remedial actions would include fuels and oils for standard operation of construction equipment. Proper storage and disposal and compliance with applicable laws and regulations governing the management of hazardous materials and hazardous waste would minimize potential impacts associated with the use of such materials. Construction activities are estimated to occur

over a 4-month period during use and transport of hazardous materials, and management and/or transport of waste generated would occur.

Remedial actions would primarily involve installation of a soil cap. The routine management, storage, and transport of materials would be consistent with all applicable federal and state laws. Any storage of hazardous or impacted materials would occur in a designated material-handling area with secondary containment. Accidental releases of hazardous or remediation materials would be minimized through the implementation of a Storm Water Pollution Prevention Plan (SWPPP), and with enhanced spill response training for construction workers. In addition, the proposed project would implement a Health and Safety Plan (HASP) which would describe, in detail, how potential for exposures would be minimized for all personnel who enter the Proposed Project Site and how migration of contaminated materials beyond the area would be prevented.

Conclusion:

The adherence to the SWPPP, HASP, and standard practices, implementation of remedial actions would not a create a significant hazard to the public or the environment throughout the routine transport, use, or disposal of hazardous materials. Project-related impacts would be less than significant.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☒ Less Than Significant Impact

☐ No 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:

Implementation of remedial actions at the Proposed Project Site have the potential to release hazardous materials into the environment during disturbance of contaminated soils; from an accidental release of fuel, oil, or maintenance chemicals from construction equipment; and/or from dust generated during construction activities. During construction activities, potential spills or releases of hazardous materials would be minimized through the following:

- Preparation and implementation of a SWPPP;
- Preparation and implementation of a HASP including requirements for workers and other construction management components such as dust and off-Site migration control; and
- Workers undertake training for all construction activities involving work in proximity to potentially contaminated soils in accordance with California Occupational Safety and Health Administration standards, contained in Title 8 of the CCR.
- Establishment and implementation of health and safety provisions for monitoring exposure to construction workers, procedures to be undertaken in the event that previously unreported contamination is discovered, and emergency procedures and responsible personnel.

Conclusion:

Remedial actions would be required to adhere to the requirements of hazardous waste management plans (i.e., HASP, SWPPP) and to implement standard practices. Therefore, the proposed project potential to 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 would be less than significant.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☒ Less Than Significant Impact

☐ No 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:

Gardena High School is located within one-quarter mile of the Proposed Project Site. However, the proposed remedial actions would not involve activities that would disturb the existing oil sludge in such a way that could impact offsite areas, including the Gardena High School.

Conclusion:
Implementation of remedial actions at the Proposed Project Site would occur within one-quarter mile of the Gardena High School. Activities associated with the remedial actions would not disturb the existing oil sludge in such a way that could impact offsite areas, including the Gardena High School.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☒ Less Than Significant Impact

☐ 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 Proposed Project Site is not included on the list of hazardous materials sites compiled pursuant to Government Code Section 65962.5.

Conclusion:

The Proposed Project Site is not included on the list of hazardous materials sites compiled pursuant to Government Code Section 65962.5; therefore, no impact would occur.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ 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:

The Proposed Project Site is not located within the boundaries of an airport land use plan. The closest airport to the site is Zamperini Field Airport which is located approximately 5 miles to the south in the City of Torrance.

Conclusion:

The proposed remedial actions would not occur in an area located within an airport land use plan nor within two miles of a public airport or public use airport. Therefore, implementation of the project would not result in a safety hazard or excessive noise for people residing or working in the project area.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

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

Impact Analysis:

In the event of an emergency during proposed remedial actions, a Project Health and Safety Plan (HASP) will be developed and implemented which outlines the actions to protect workers during remedy implementation. The HASP includes contingency plans for spills, fires, or other emergencies during construction activities.

The transportation of equipment and materials to and from the Proposed Project Site have the potential to impair implementation or interfere with the existing emergency response plan and/or evacuation plan. Specifically, trucks carrying equipment and materials could slow down the flow of traffic on public streets and potentially impede emergency response or evacuation efforts. However, the HASP includes a stop-work authority requirement for all work locations and workers and grants any worker the ability to stop work if an unsafe condition is identified that could cause substantial harm or imminent danger to health and safety of workers, the public, or the environment. As a result, if actions described in the HASP were to be implemented in response to an emergency, project management would be able to immediately suspend equipment and material transportation until the emergency response is completed or the evacuation order is lifted.

Conclusion:

The proposed project would implement a HASP that would allow for suspending construction activities that could impair implementation of an adopted emergency response plan or emergency evacuation plan. Impacts to an adopted emergency response plan or emergency evacuation plan are considered less than significant.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☒ Less Than Significant Impact

☐ 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 Proposed Project Site is not located in an area with environmental conditions conducive to wildland fires. The project site is in an area lacking dry vegetation (urban area). However, operation of construction equipment on the during remedial actions has the limited potential to spark a fire.

Conclusion:

Although construction equipment has a minimal potential to spark a fire during remedial actions, implementation of BMPS would substantially limit the potential for a wildland fire that exposes people or structures to a significant risk of loss, injury or death to occur. Impacts from wildland fires during implementation of the remedial actions are considered less than significant.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☒ Less Than Significant Impact

☐ No Impact

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 State Water Resources Control Board and the Regional Water Quality Control Boards (collectively Water Boards) share authority to implement the Federal Clean Water Act (CWA, 33 U.S.C. §1251 et seq.) and California's Porter-Cologne Water Quality Control Act (California Water Code, Section 7). The CWA establishes the basic structure for regulating discharges of pollutants into the waters of the United States and regulating quality standards for surface waters.

The Water Boards enforce waste discharge requirements through National Pollutant Discharge Elimination System (NPDES) permits. The Porter-Cologne Act mandates the Regional Water Board to develop, adopt and implement a Basin Plan for the Region. The Water Quality Control Plan for the Los Angeles Basin (Los Angeles Region Basin Plan) is the master policy document that contains descriptions of the legal, technical, and programmatic bases of water quality regulation in the Region.

The following are also applicable:

- The State Board published a resolution (SWRCB Resolution No. 88-63, as revised by Resolution No. 2006-0008) adopting policy regarding sources of drinking water where exceptions are provided for waters meeting certain criteria.

- The U.S. Environmental Protection Agency promulgated numeric water quality criteria for priority toxic pollutants and other water quality standards provisions to be applied to inland surface waters, enclosed bays and estuaries in California (California Toxics Rule, CTRs).

- A California Stormwater Construction General Permit is required for construction projects disturbing more than 1 acre. The legally responsible person is required to electronically file permit registration documents consisting of a notice of intent, risk assessment, site map, SWPPP, annual fee, and signed certification statement through the State Water Board's Storm Water Multi-Application and Report Tracking System.

ENVIRONMENTAL SETTING (BASELINE):

The Site is located in the Coastal Plain of Los Angeles Groundwater Basin (California Regional Water Quality Control Board, 2014). Surface water bodies within a one-mile radius of the Proposed Project Site include the Dominguez Channel adjacent to the south. The Proposed Project Site does not include wetlands.

The Proposed Project Site is zoned Mixed Use Overlay for the Artesia Corridor Specific Plan and is mostly covered with sludge ponds. Commercial and residential properties are located adjacent to the Proposed Project Site directly to the west and south.

Groundwater is encountered at the Proposed Project Site at depths ranging from approximately 3 to 8 feet above mean sea level. Shallow groundwater generally flows to the south from Artesia Boulevard to the Dominguez Channel or flows to the east. Shallow groundwater at the Proposed Project Site is impacted primarily with gasoline range organics (GRO), Bis(2-ethylhexyl)Phthalate, beryllium, cadmium, and nickel.

The Water Quality Control Plan for the Los Angeles Groundwater Basin (Basin Plan) identifies numerous sources of historic pollution in the groundwater resulting from polycyclic aromatic hydrocarbons (PAHs) and also contains remnants of persistent legacy pesticides as well as PCBs. Oil pumping also had a large presence in the area historically with some wells still in operation.

APPLICABLE THRESHOLDS OF SIGNIFICANCE:

The list of hydrology and water quality effects that may be considered significant contained in Appendix G of the CEQA Guidelines (Environmental Checklist) was used to establish a threshold of significance**.**

ENVIRONMENTAL STUDIES PERFORMED AND METHODOLOGY:

The hydrogeological conditions have been characterized through investigations completed as part of the Site investigations. Groundwater samples were also collected and characterized.

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 objectives of the proposed remedial actions include improving water quality conditions by 1) excavating contaminated materials in the Haack Rework Area and a portion of sludge overflow along the eastern perimeter of the Cooper Sumps and then consolidating the materials above the Cooper North and South Sumps and 2) constructing a cap consisting of a stabilization layer, foundation layer, low-hydraulic conductivity layer, and erosion resistance layer above the sumps.

Construction activities during implementation of onsite remedial actions would not violate any water quality standards or water discharge requirements. A site-specific SWPPP would be prepared by a certified Qualified SWPPP Developer and implemented to ensure surface water bodies are not impacted during construction

activities. Associated BMPs (e.g., drainage ditch) as part of the SWPPP would be implemented during construction to prevent runoff into surface water bodies. After completion of construction activities, storm water runoff from the Site would continue to be captured by a v-shaped trench filled with soil and concrete to form surface water drainage ditches. The proposed cap will include grading to divert stormwater to the drainage ditches and prevent stormwater from ponding on the cap (Figure 3).

Conclusion:

The proposed remedial actions are anticipated to improve surface water quality and groundwater quality and result in the overall reduction of contaminant mass permeating into surface and groundwater systems. Project activities would not violate any water quality standards, waste discharge requirements, or otherwise substantially degrade surface or groundwater quality. Impacts are considered to be less than significant.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☒ Less Than Significant Impact

☐ 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:

Groundwater would not be extracted as part of implementation of the remedial actions. Contaminated groundwater beneath the site would remain isolated. Construction of the cap above the sumps would result in a small reduction of groundwater recharge. However, implementation of the proposed remedial actions would not substantially interfere with the overall recharge of the Los Angeles Groundwater Basin because the footprint of the proposed impervious surfaces (i.e., cap) is very small compared to the overall groundwater basin.

Conclusion:

Implementation of the remedial actions would not interfere substantially with groundwater recharge of the Los Angeles Groundwater Basin. A less-than-significant impact is expected to occur.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☒ Less Than Significant Impact

☐ 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:

Construction of the proposed cap above the sumps would not substantially increase the paved surface area of the Site, and the existing storm water controls on the Proposed Project Site are sufficient for the additional runoff.

Currently, the sumps are unpaved and surface water (i.e., precipitation) infiltrates through the subsurface. Construction of the proposed cap above the sumps would affect the current drainage pattern slightly, but as intended by design to direct runoff to prevent ponding and infiltration. Storm water would not pond on the cap and the runoff from the cap would be captured by a v-shaped trench filled with soil and concrete to form surface water drainage ditches.

Runoff from the cap would be managed in accordance with all applicable laws and regulations and implementation of the SWPPP would ensure erosion or siltation does not occur on- or offsite during construction activities.

Conclusion:

Implementation of the remedial actions would result in slight changes to onsite drainage patterns. However, the proposed remedial actions would not substantially alter the existing drainage pattern of the overall Proposed Project Site or project area in a manner which would result in substantial erosion or siltation on- or offsite. Consequently, impacts are considered to be less than significant.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☒ Less Than Significant Impact

☐ 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:

Construction of the cap above the sumps would increase the paved surface area of the Site and slightly increase runoff. However, the existing, operating storm water controls at the Proposed Project Site are sufficient to prevent flooding due to the increase in paved surface.

Currently, the Site is unpaved and surface water (i.e., precipitation) can infiltrate through the subsurface. The cap to be constructed at this area would be designed to direct storm water runoff so that ponding and flooding would not occur. Storm water would not pond on the cap and the runoff from the cap would be captured by a v-shaped trench filled with soil and concrete to form surface water drainage ditches.

Conclusion:

Although the proposed remedial actions would create minor alterations to existing drainage patterns on the Proposed Project Site, it would not substantially alter the rate or amount of surface runoff in a manner which would result in flooding on- or offsite. Impacts related to flooding are considered to be less than significant.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☒ Less Than Significant Impact

☐ No Impact

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

Impact Analysis:

Construction of a cap above the sumps would slightly increase the paved surface area of the Site. However, the increase in runoff would not exceed the capacity of existing storm water controls at the Site. The cap is designed to cover contaminated soil and would, therefore, reduce sources of polluted runoff.

Precipitation would not infiltrate through the cap. The cap would be graded to direct storm water runoff to the newly constructed v-shaped trench filled with soil and concrete to form surface water drainage ditches. This drainage system would be designed with adequate capacity for the runoff, even during wet years, and no exceedance of capacity is anticipated. The cap designed to cover contaminated soil and would, therefore, reduce potential sources of polluted runoff.

In addition, requirements of the SWPPP would be followed and associated BMPs would be implemented during construction activities to ensure activities would not create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff. BMPs can include structural BMPs such as silt fences, sedimentation ponds,

erosion control blankets, and temporary or permanent seeding, while non-structural BMPs can include picking up trash and debris, sweeping up nearby sidewalks and streets, maintaining equipment, and training site staff on erosion and sediment control practices.

Conclusion:

Construction activities and implementation of proposed remedial actions would not create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☒ Less Than Significant Impact

☐ No Impact

(iv) impede or redirect flood flows?

Impact Analysis:

According to the FEMA Flood Map, the Proposed Project Site does not lie within a 100-year flood hazard area (Los Angeles County, 2021). In addition, the proposed remedial actions would not involve building any structures which could impede or redirect flood flows.

Conclusion:

Activities associated with proposed remedial actions would not construct any structures which could impede or redirect flood flows. Therefore, no impact would occur.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

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

Impact Analysis:

The Proposed Project Site is not located in an area at risk from tsunami inundation (CDC 2021). The Proposed Project Site is not susceptible to seiche inundation because there are no major landlocked bodies of water within or near the site.

Conclusion:
Implementation of proposed remedial actions would not occur in an area at risk to seiche or from tsunami inundation. Therefore, the potential for release of pollutants from the Proposed Project Site would not occur. No impact would occur.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

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

Impact Analysis:

The objectives of the proposed remedial actions include improving water quality conditions by constructing a cap above the sumps. The caps would reduce the infiltration of water through contaminated soil and, thus, decrease the potential for contaminants to migrate from soil to groundwater.

Conclusion:

Construction activities during implementation of site remedial actions would not violate any water quality standards or water discharge requirements identified in any water quality control plan or sustainable groundwater management plan.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

References Used:

California Department of Conservation (CDC). 2021. Department of Conservation Tsunami Inundation Map, https://www.conservation.ca.gov/cgs/tsunami/maps. Accessed: April 23, 2021).

Los Angeles County. 2021. Flood Zone Determination Website. https://dpw.lacounty.gov/floodzone/ (Accessed April 23, 2021).

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):

City of Gardena Zoning Code provides restrictions and regulations on land uses and identifies the Proposed Project Site as a Mixed Use Overlay for the Artesia Corridor Specific Plan. The City of Gardena General Plan designates the land use of the Proposed Project Site as Mixed Use Overlay and designates the adjacent areas as General Commercial and Public/Institutional.

ENVIRONMENTAL SETTING (BASELINE):

The Artesia Corridor Specific Plan refers to the Proposed Project Site as an area to develop an existing underutilized brownfield commercial and industrial site into a well-designed and attractive mixed-use development. The Proposed Project Site is expected to redevelop sometime in the future and most likely in-line with the vision established by the City's Artesia Corridor Specific Plan. However; any specific, future development of the Proposed Project Site has not yet been determined.

APPLICABLE THRESHOLDS OF SIGNIFICANCE:

The list of land use and planning resource effects that may be considered significant contained in Appendix G of the CEQA Guidelines (Environmental Checklist) was used to establish a threshold of significance.

ENVIRONMENTAL STUDIES PERFORMED AND METHODOLOGY:

Based on the lack of land use changes in or near the Proposed Project Site, no environmental studies relating to land use and planning were prepared for the Proposed Project.

IMPACT ANALYSES AND CONCLUSIONS:

Analysis as to whether or not project activities would:

a. Physically divide an established community?

Impact Analysis:

There are no residential areas or developed community on the Proposed Project Site. Implementation of the proposed remedial actions would not physically divide the nearby established community.

Conclusion:

Proposed remedial actions would not have the potential to physically divide an established community based on the distance between the Proposed Project Site and nearest developed community. No impact would occur.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ 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 proposed remedial actions are intended to be a remedy to previous environmental effects (i.e., storage of sludge in sumps). Implementation of the proposed remedial actions would not conflict with land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect but would improve the existing environment.

Conclusion:

The proposed remedial actions would remedy previous environmental effects and would not conflict with land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. No impact would occur.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

References Used:

City of Gardena. Zoning Information. 2021. https://www.cityofgardena.org/zoning-information/ (Accessed April 23, 2021).

City of Gardena. 2006. Artesia Corridor Specific Plan. https://www.cityofgardena.org/artesia-corridor/ (Accessed April 23, 2021).

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):
No laws, ordinances, regulations, or standards protecting mineral resources are applicable to the Proposed Project.

ENVIRONMENTAL SETTING (BASELINE):

Proposed Project Site is located in an urban, developed area of the City of Gardena which has been identified as Urban Land by the California Department of Conservation and has been designated as Mixed Use Overlay for the Artesia Corridor Specific Plan.

APPLICABLE THRESHOLDS OF SIGNIFICANCE:

The list of mineral resource effects that may be considered significant contained in Appendix G of the CEQA Guidelines (Environmental Checklist) was used to establish a threshold of significance.

ENVIRONMENTAL STUDIES PERFORMED AND METHODOLOGY:

Based on the lack of mineral resources in or near the Proposed Project Site, no environmental studies relating to mineral resources were prepared for the Proposed Project.

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:

The Proposed Project Site is located in an urban, developed area and no known mineral resources of value to the region and the residents of the state exist on the Site.

Conclusion:

The cap would not prevent access to potential mineral resources if the Proposed Project Site and surrounding area are ever reclassified. Therefore, no impacts would occur.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ 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:

The Proposed Project Site is located in an urban, developed area and is not located in an area identified as a mineral resource area.

Conclusion:

The Proposed Project Site is not likely to contain significant mineral deposits and the proposed remedial actions would not prevent access to mineral resources if the Proposed Project Site and surrounding area are ever reclassified. Therefore, no impacts would occur.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

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 groundborne vibration or groundborne 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 Noise Plan of the City of Gardena discusses the City's goal to improve the overall environment in the City by reducing annoying and physically harmful levels of noise for existing and future residents, and for all land uses. The City adopted noise levels in commercial districts at 65 dB community noise equivalent level (CNEL) between 7 a.m. to 10 p.m., and 60 dB from 10 p.m. to 7 a.m. The noise levels are calculated using a 15-minute average noise level.

The City of Gardena Municipal Code (Chapter 8.36) addresses impacts that are due to construction noise. The noise ordinance states that noise associated with construction and grading are exempt from restrictions in the noise ordinance if they occur between 7 a.m. and 6 p.m. on weekdays and between 9 a.m. and 6 p.m. on weekends and holidays (Section 8.36.080(G)).

ENVIRONMENTAL SETTING (BASELINE):

The Proposed Project Site is located in an urban, developed area of the City of Gardena and currently zoned for future mixed-use development as part of the Artesia Corridor Specific Plan. Existing ambient noise in the area of the Proposed Project Site includes commercial business activities to the north, east, and south and vehicle trips along nearby roads (e.g., Artesia Boulevard, Normandie Avenue).

APPLICABLE THRESHOLDS OF SIGNIFICANCE:

For purposes of this analysis, noise effects may be considered significant if project activities would result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the Proposed Project Site in excess of City noise level standard of 65 dB CNEL or result in generation of excessive ground-borne vibration or ground-borne noise levels.

ENVIRONMENTAL STUDIES PERFORMED AND METHODOLOGY:

The Federal Highway Administration (FHWA) developed the Roadway Construction Noise Model (RCNM), which has become the industry-accepted standard model for calculating construction noise levels at specific receptor locations. Model inputs include the type and number of pieces of heavy construction equipment, their usage factors, distance to a receptor, and estimated shielding reduction (if any). The noise modeling for the proposed remedial actions were analyzed according to default construction equipment list from the air quality impact analysis for the Proposed Project. To reflect a conservative analysis, a reasonable worst-case scenario was modeled, assuming that each piece of modeled equipment would operate simultaneously at a reasonable distance from one another at the nearest possible locations to each modeled receptor. The modeled receptor locations represent the closest existing sensitive receptors to the Proposed Project Site.

The City uses CNEL for regulating noise levels throughout the City. CNEL is the average equivalent sound level over a 24-hour period, with a penalty added for noise during the nighttime hours of 7:00 p.m. to 10:00 p.m. and of 10:00 p.m. to 7:00 a.m. During the evening period, 5 dB is added to take into account the decrease in community background noise between the hours of 7:00 p.m. to 10:00 p.m. During the nighttime period, 10 dB is added to take into account the decrease in community background noise between the hours of 10:00 p.m. to 7:00 a.m. However, construction activities associated with implementing the proposed remedial actions would occur only during daytime hours and would not be subject to the noise penalty applied to CNEL. Therefore, this analysis uses Leq, the equivalent continuous sound level in decibels measured over a stated period of time (typically one hour), for the purposes of measuring project-generated noise.

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 Proposed Project would use heavy equipment for 1) excavation of the Haack Rework Area and a portion of sludge overflow along the eastern perimeter of the Cooper Sumps, 2) consolidation of materials above the Cooper North and South Sumps, and 3) construction of a cap consisting of a stabilization layer, foundation layer, low-hydraulic conductivity layer, and erosion resistance layer above the sumps. In addition, a vapor control and monitoring system and groundwater monitoring system would be installed beneath the cap and around the sumps.

Remedial actions would occur over 4 months during daytime hours which meet the City of Gardena's requirement for construction activities to occur during normal work hours of the day to provide relative quiet during the more sensitive evening and early morning periods (Municipal Code Section 8.36.080(G)).

The City uses CNEL for regulating noise levels, however, construction activities associated with implementing the proposed remedial actions would occur only during daytime hours and would not be subject to the noise penalty applied to CNEL. Therefore, this analysis uses Leq for the purposes of measuring noise generated during construction activities and is considered relevant and appropriate. Leq is the equivalent continuous sound level in decibels, equivalent to the total sound energy measured over a stated period of time (typically one hour).

The Proposed Project Site is located adjacent to the nearest noise sensitive receptors (i.e., residences). Using the RCNM, noise levels generated by the loudest construction equipment anticipated to be used for remedial actions (i.e., paver, loader, excavator) at the Proposed Project Site are predicted to be 81.1 Leq dBA at 50 feet (closest distance between the Proposed Project Site and nearest residence) (FHWA 2006) (Attachment B). Based on this predicted noise level, temporary noise levels during construction activities are anticipated to be noticed at nearby receptors (e.g., residences) and construction activities would meet City regulations.

Conclusion:

The Proposed Project would meet City of Gardena's requirement that construction activities shall be concentrated during the hours of the day. However, noise levels generated during construction activities would be highly discernible from the existing ambient noise levels in the Proposed Project Site area because of the distance (50 feet) to the nearest noise receptor (e.g., residence). With construction activities occurring only during City of Gardena allowable hours, the Proposed Project would have a less than significant impact.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☒ Less Than Significant Impact

☐ No Impact

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

Impact Analysis:

Implementation of proposed remedial actions would require the use of heavy construction equipment (i.e., paver, loader, excavator) at the Proposed Project Site. Ground-borne vibration and noise generated by the use of these heavy construction equipment could be felt at the nearest receptor (i.e., residence) because of the relatively close distance to construction activities (50 feet). However, ground-borne vibration and ground-borne noise levels would not occur at levels that would be considered excessive because the ground would substantially attenuate vibration and noise.

Conclusion:

Construction equipment used during proposed remedial actions would not generate excessive ground-borne vibration or noise felt at the nearest receptor. A less-than-significant impact would occur.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☒ Less Than Significant Impact

☐ No 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 Proposed Project Site is not located within an airport land use plan, vicinity of a private airstrip, or within two miles of a public airport or public use airport. The closest airport to the site is Zamperini Field Airport which is located approximately 5 miles to the south in the City of Torrance.

Conclusion:
The proposed remedial actions would not the potential to expose people residing or working in the project area to excessive noise levels generated by a nearby airport or airfield. No impact would occur.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

References Used:

City of Gardena Municipal Code. https://www.codepublishing.com/CA/Gardena/html/Gardena08/Gardena0836.html (Accessed April 28, 2021).

Federal Highway Administration (FHWA). February 15, 2006. Roadway Construction Noise Model. https://www.fhwa.dot.gov/environment/noise/construction_noise/rcnm/ (Accessed July 2, 2019).

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):

No laws, ordinances, regulations, or standards protecting population and housing resources are applicable to the Proposed Project.

ENVIRONMENTAL SETTING (BASELINE):

City of Gardena Zoning Code provides restrictions and regulations on land uses and identifies the Proposed Project Site as a Mixed-Use Overlay for the Artesia Corridor Specific Plan. The City of Gardena General Plan designates the land use of the Proposed Project Site as Mixed-Use Overlay and designates the adjacent areas as General Commercial and Public/Institutional.

The Artesia Corridor Specific Plan refers to the Proposed Project Site as an area to develop an existing underutilized brownfield commercial and industrial site into a well-designed and attractive mixed-use development. The Proposed Project Site is expected to redevelop sometime in the future and most likely in-line with the vision established by the City's Artesia Corridor Specific Plan. However, any specific, future development of the Proposed Project Site has not yet been determined.

APPLICABLE THRESHOLDS OF SIGNIFICANCE:

The list of population and housing resource effects that may be considered significant contained in Appendix G of the CEQA Guidelines (Environmental Checklist) was used to establish a threshold of significance.

ENVIRONMENTAL STUDIES PERFORMED AND METHODOLOGY:

Based on the lack of housing on the Proposed Project Site, no environmental studies relating to population and housing resources were prepared for the Proposed Project.

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:

Implementation of the proposed remedial actions are intended to clean up or cap contaminated soils and could allow for future development at the Proposed Project Site. As a result, remediation of contaminated soils and construction of a cap could allow for increased population growth, such as new mixed use land uses envisioned in the Artesia Corridor Specific Plan. However, the potential future population growth is planned for by the City of Gardena.

Conclusion:

The Proposed Project could have the potential to allow for future population growth; however, the potential growth is planned for in the City's Artesia Corridor Specific Plan. No impact would occur.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

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

Impact Analysis:
Implementation of the proposed remedial actions are intended to clean up or cap contaminated soils at the Proposed Project Site. Remediation of contaminated soils would not require removing any existing people or housing.

Conclusion:
The Proposed Project would not have the potential to displace substantial numbers of existing people or housing.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

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**
Fire protection?	☐	☐	☒	☐
Police protection?	☐	☐	☒	☐
Schools?	☐	☐	☐	☒
Parks?	☐	☐	☐	☒
Other public facilities?	☐	☐	☒	☐

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

No laws, ordinances, regulations, or standards protecting public services resources are applicable to the Proposed Project.

ENVIRONMENTAL SETTING (BASELINE):

City of Gardena Zoning Code provides restrictions and regulations on land uses and identifies the Proposed Project Site as a Mixed-Use Overlay for the Artesia Corridor Specific Plan. The City of Gardena General Plan designates the land use of the Proposed Project Site as Mixed Use Overlay and designates the adjacent areas as General Commercial and Public/Institutional.

Public parks located within 1 mile of the Proposed Project Site includes Gardena Willows Wetland Preserve (located ¼ mile to the east) and Guenser Park (located ¾ mile to the west). Gardena High School is located ¼ mile to the southeast of the Site. Gardena Police Department is located 1 mile to the northwest of the Site. Los Angeles County Fire Department Station 158 is located 1 mile to the north and Memorial Hospital of Gardena is located 1.5 miles to the north of the Site. Lastly, the Gardena Mayme Library is located 1 mile to the northwest of the Site.

APPLICABLE THRESHOLDS OF SIGNIFICANCE:

The list of public services resource effects that may be considered significant contained in Appendix G of the CEQA Guidelines (Environmental Checklist) was used to establish a threshold of significance.

ENVIRONMENTAL STUDIES PERFORMED AND METHODOLOGY:

Based on the less than significant impact of the Proposed Project Site to public services resources, no environmental studies relating to public services resources were prepared for the Proposed Project.

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:

Fire protection?

Impact Analysis:

The closest fire station to the Proposed Project Site is Los Angeles County Fire Department Station #158, located at 16560 West 162nd Street in Gardena. The drive distance between the Proposed Project Site and Station #86 is 1.3 miles. Potential demands on fire protection services may increase slightly during the construction period as a result of unforeseen events related to the scope of work. However, ongoing adherence to procedures and practices identified in the Proposed Project's HASP would reduce the potential for incidents to occur that would require a fire district response.

Conclusion:

Ongoing adherence to procedures and practices identified in the Proposed Project's HASP would reduce the potential for incidents to occur that would require response from fire protection services. After completion of remedial actions, the Proposed Project would not cause an increase in demand on fire protection, as compared to the current demand.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☒ Less Than Significant Impact

☐ No Impact

Police protection?

Impact Analysis:

The Proposed Project Site is located in the jurisdiction of the City of Gardena's Police Department. Potential demands on law enforcement or emergency response services could increase slightly during the construction period as a result of unforeseen events or circumstances. However, risks to human health and safety would be minimized through ongoing adherence to procedures and practices identified in the Proposed Project's HASP.

Conclusion:

Ongoing adherence to procedures and practices identified in the Proposed Project's HASP would reduce the need for police protection services. After completion of remedial actions, the project would not cause an increase in demand on police protection, as compared to current demand.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☒ Less Than Significant Impact

☐ No Impact

Schools?

Impact Analysis:

The closest schools to the Proposed Project Site include Gardena High School which is located ¼ mile to the southeast. The Proposed Project would not result in an increase in population or associated increase in demand on these schools.

Conclusion:

Remedial actions would not create a demand for existing or new school facilities. No impact to school facilities would occur.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

Parks?

Impact Analysis:

The nearest neighborhood parks to the Site include the Gardena Willows Wetland Preserve (located ¼ mile to the east) and Guenser Park (located ¾ mile to the west). The Proposed Project would not result in an increase in population or associated increase in demand on parks.

Conclusion:

Remedial actions would not create a demand for existing or new park facilities. No impact to park facilities would occur.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

Other public facilities?

Impact Analysis:

The closest hospital to the Proposed Project Site is the Memorial Hospital of Gardena, located approximately 1.5 miles to the north at 1145 West Redondo Beach Boulevard in Gardena. Construction activities could result in a slight increase in demands for services at the medical center. The potential for incidents requiring medical attention would be minimized through adherence with the Proposed Project's HASP.

Conclusion:

Ongoing adherence to procedures and practices identified in the Proposed Project's HASP would reduce the need for other public facilities and services. After remedial actions complete, the project would not cause an increase in demand on other public facilities and services, as compared to current demand.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☒ Less Than Significant Impact

☐ No Impact

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):

No laws, ordinances, regulations, or standards protecting agriculture or forestry resources are applicable to the Proposed Project.

ENVIRONMENTAL SETTING (BASELINE):

Public parks located within 1 mile of the Proposed Project Site includes Gardena Willows Wetland Preserve (located ¼ mile to the east) and Guenser Park (located ¾ mile to the west). Gardena High School is located ¼ mile to the southeast of the Site. The Gardena Willows Wetland Preserve aims at restoring, maintaining, and enhancing the preserve's unique natural habitat and native flora and fauna for the enjoyment, enrichment, and education of present and future generations. Guenser Park is located in the City of Torrance and provides amenities including picnic areas, barbecues, a playground, a softball diamond, a basketball court, a horseshoe court, and a fitness course.

APPLICABLE THRESHOLDS OF SIGNIFICANCE:

The list of recreational resource effects that may be considered significant contained in Appendix G of the CEQA Guidelines (Environmental Checklist) was used to establish a threshold of significance.

ENVIRONMENTAL STUDIES PERFORMED AND METHODOLOGY:

Based on the lack of impacts to recreational resources in or near the Proposed Project Site, no environmental studies relating to recreational resources were prepared for the Proposed Project.

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:

The nearest neighborhood park is Guenser Park, located ¾ miles west of the Proposed Project Site in a residential district. Implementation of proposed remedial actions would not directly increase the permanent resident population in the area because no habitable structures are planned as part of the project.

Conclusion:

The Proposed Project would not increase the use of existing neighborhood and regional parks, other recreational parks, or other recreational facilities, such that substantial physical deterioration of the facility would occur or be accelerated. No impact to the use of existing neighborhood and regional parks or other recreational facilities would occur.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ 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 Proposed Project Site does not contain any existing recreational facilities. Implementation of proposed remedial actions would not involve or require construction of any recreational facilities.

Conclusion:

The proposed project would not construct or cause the need for construction of additional recreational facilities. No impact to existing or need for additional recreational facilities would occur.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

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):

Federal laws and regulations:

- Resource Conservation and Recovery Act (RCRA) Title 42 United States Code Subtitle C and 40 Code Federal Regulations (CFR) Parts 260-279. More specifically, transporters of hazardous waste are governed by 40 CFR part 263. RCRA gives EPA the authority to control hazardous waste from the generation, transportation, treatment, storage, and disposal of hazardous waste.

- The U.S. Department of Transportation Pipeline and Hazardous Materials Safety Administration regulates the transport of hazardous materials through Title 49 of the Code of Federal Regulations, Subchapter C.

State laws and regulations:

- Hazardous Waste Control Law (Health and Safety Code (HSC) Chapter 6.5) and 22 California Code of Regulations (CCR). The law establishes regulations and incentives which ensure that the generators of hazardous waste employ technology and management practices for the safe handling, treatment, recycling, and destruction of their hazardous wastes prior to disposal. Article 6 of HSC Chapter 6.5 discusses the transportation of hazardous waste.

- California Vehicle Code: Divisions 2, 6, 12, 13, 14, 15 also apply to transportation of hazardous materials.

Local laws and regulations:

The Los Angeles County Metropolitan Transportation Authority (MTA) is the agency responsible for planning and operating regional transit facilities and services in Los Angeles County. The MTA prepares the Congestion Management Plan (CMP) mandated by State Law, which defines the countywide transportation network, establishes service level targets for network routes, and identifies strategies to reduce congestion.

ENVIRONMENTAL SETTING (BASELINE):

Artesia Boulevard and Normandie Avenue provide the main access routes into the Proposed Project Site. Artesia Boulevard becomes State Highway 91 to the east of Normandie Avenue and is included in the MTA CMP. Interstate 110 located approximately 1 mile east of the Site is also included in the MTA CMP.

State Highway 91 in the Proposed Project area operates at Level of Service (LOS) E during the AM and PM peak hours. Interstate 110 in the Proposed Project area operates at LOS E or better during the AM and PM peak hours (MTA CMP 2010). According to the CMP, since 2001, the proportion of intersections that achieved operating efficiencies in the LOS range between A and D has steadily increased with each successive update to the CMP.

APPLICABLE THRESHOLDS OF SIGNIFICANCE:

The list of transportation resource effects that may be considered significant contained in Appendix G of the CEQA Guidelines (Environmental Checklist) was used to establish a threshold of significance. LOS has been the standard by which transportation impacts of major developments and changes to roads were measured. LOS was formally defined in the 1965 Highway Capacity Manual as a "qualitative measure of the effect of a number of factors, which include speed and travel time, traffic interruptions, freedom to maneuver, safety, driving comfort and convenience, and operating cost". It is better understood today that LOS does not accurately reflect vehicle travel as it only focuses on individual local intersections and roadway segments and not on the entire vehicle trip. In 2013, the State of California passed Senate Bill (SB) 743 which required the Office Planning and Research (OPR) to amend the CEQA Guidelines to provide an alternative to LOS for evaluating transportation impacts. LOS was replaced with Vehicle Miles Traveled (VMT) as "the most appropriate metric of a project's potential transportation impacts". VMT data are used primarily by transportation agencies, environmental agencies, and consultants to perform a variety of functions such as allocating resources, estimating vehicle emissions, computing energy consumption, and assessing traffic impacts.

Section 15064.3(b) of the CEQA Guidelines states the following:

(b) Criteria for Analyzing Transportation Impacts.

(1) Land Use Projects. Vehicle miles traveled exceeding an applicable threshold of significance may indicate a significant impact. Generally, projects within one-half mile of either an existing major transit stop or a stop along an existing high-quality transit corridor should be presumed to cause a less than significant transportation impact. Projects that decrease vehicle miles traveled in the project area compared to existing conditions should be presumed to have a less than significant transportation impact.

(2) Transportation Projects. Transportation projects that reduce, or have no impact on, vehicle miles traveled should be presumed to cause a less than significant transportation impact. For roadway capacity projects, agencies have discretion to determine the appropriate measure of transportation impact consistent with CEQA and other applicable requirements. To the extent that such impacts have already been adequately addressed at a programmatic level, such as in a regional transportation plan EIR, a lead agency may tier from that analysis as provided in Section 15152.

(3) Qualitative Analysis. If existing models or methods are not available to estimate the vehicle miles traveled for the particular project being considered, a lead agency may analyze the project's vehicle miles traveled qualitatively. Such a qualitative analysis would evaluate factors such as the availability of transit, proximity to other destinations, etc. For many projects, a qualitative analysis of construction traffic may be appropriate.

(4) Methodology. A lead agency has discretion to choose the most appropriate methodology to evaluate a project's vehicle miles traveled, including whether to express the change in absolute terms, per capita, per household or in any other measure. A lead agency may use models to estimate a project's vehicle miles traveled, and may revise those estimates to reflect professional judgment based on substantial evidence. Any assumptions used to estimate vehicle miles traveled and any revisions to model outputs should be documented and explained in the environmental document prepared for the project. The standard of adequacy in Section 15151 shall apply to the analysis described in this section.

ENVIRONMENTAL STUDIES PERFORMED AND METHODOLOGY:

Based on the less than significant impact to transportation resources in or near the Proposed Project Site, no environmental studies relating to transportation resources were prepared for the Proposed Project.

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:

The proposed remedial actions would not affect public roadways in the long-term because these activities would not substantially affect the overall circulation system. The Proposed Project would add some traffic to roadways during the 4-month construction period due to delivery of materials and supplies to the Site, removal of wastes from the Site, and workers traveling to and from the Site. The Proposed Project would not have any long-term effects on congestion levels.

During construction, periodic movement of heavy equipment would occur using Artesia Boulevard or Normandie Avenue. It is anticipated that up to 30 heavy haul truck trips (10 truck trips for hauling away contaminated soils, 20 truck trips for importing fill soil) would occur over the 4-month construction period. The trucks would primarily enter and exit the Proposed Project Site at Artesia Boulevard. As these trips would be intermittent, the remedial actions would not substantially increase the traffic on any public street system. It is anticipated that an Encroachment Permit with City of Gardena-approved Traffic Plan may be required for the truck traffic to and from the Proposed Project Site. The permit will be to be obtained before commencement of remedy construction, if required.

Prior to entering the Site, all haulers will demonstrate that their vehicles are properly registered, operational, and placarded in compliance with Federal, State and Local laws, for the type of material being transported. In addition, Arco will require that all haulers provide transport in accordance with City of Gardena Public Works and California Department of Transportation permitted transportation safety requirements. The Proposed Project would implement traffic congestion management by minimizing truck transport to off-peak hours, reducing the number of trucks per day, caravanning trucks to and from the site, and spacing out trucks leaving the site. Therefore, the Proposed Project is considered a less-than-significant impact in relation to congestion management.

The closest bike lane to the Proposed Project Site extends along Normandie Avenue adjacent to the Site. The nearest bus line (Metro Route #130 and #344) operates along Artesia Boulevard adjacent to the Site. The temporary increase in truck traffic during implementation of remedial actions would not affect any program, plan, ordinance or policy relating to these transportation facilities.

Conclusion:

The proposed project would not incorporate any activities, short-term or long-term, that would have the ability to conflict with any program, plan, ordinance or policy addressing the circulation system, including transit, roadways, bicycle and pedestrian facilities in the project area.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☒ Less Than Significant Impact

☐ No Impact

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

Impact Analysis:

Vehicle miles traveled (VMT) is a measure used in transportation planning for a variety of purposes. It measures the amount of travel for all vehicles in a geographic region over a given period of time, typically a one-year period. VMT is calculated by adding all the miles driven by all the cars and trucks on all the roadways in a region. This metric plays an integral role in the transportation planning, policy-making, and revenue estimation processes due

to its ability to indicate travel demand and behavior. VMT may also be used to evaluate conformity assumptions, adjust travel demand forecasts, and identify pavement maintenance needs. Implementation of remedial actions would not generate additional long-term vehicle trips or change circulation patterns in the project area.

Conclusion:

The proposed remedial actions would not increase long-term vehicle miles traveled levels from/to the Proposed Project Site consistent with Section 15064.3(b) of the CEQA Guidelines. There would be no impact.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ 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 proposed project involves onsite remedial actions to address soil and groundwater contamination. The proposed remedial actions would not contain a design feature or incompatible use that would substantially increase traffic hazards because the activities would not alter the public roadways system. The current intersection at Artesia Boulevard and Normandie Avenue is light controlled for safe traffic movements to/from the Proposed Project Site and this condition would not change.

Conclusion:

Implementation of the remedial actions would not include any design features or incompatible uses which would substantially increase hazards. No impacts related to increased hazards due to a geometric design feature or incompatible uses would occur.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

d. Result in inadequate emergency access?

Impact Analysis:

The proposed remedial actions would not affect emergency access to/from the Proposed Project Site in the long-term because these activities would not substantially change the overall circulation system on- and offsite. In addition, all construction equipment would be located and stored onsite and would not have the potential to block access roads.

Conclusion:

Emergency access to/from the Proposed Project Site would not change with implementation of remedial actions. No impacts related to inadequate emergency access would occur.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

References Used:

Los Angeles County Metropolitan Transportation Authority (MTA). *2010 Congestion Management Program*. Available at: https://planning.lacity.org/eir/ConventionCntr/DEIR/files/references/2010%20Congestion%20Management%20Plan.pdf Accessed May 25, 2021.

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):

Tribal cultural resources are defined in PRC Div. 13 Section 21074. 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 (PRC 21081.3.1).

If remains are found on Site, the County Coroner will make the determination of origin and disposition, pursuant to Public Resources Code (PRC) § 5097.98. If the remains are determined to be Native American, the Coroner would notify the NAHC (per Health and Safety Code 7050.5(c)) The NAHC would identify and notify the person(s) who might be the most likely descendent, who would make recommendations for the appropriate and dignified treatment of the remains (PRC Div. 5 section 5097.98). The descendants shall complete their inspection and make recommendations for treatment within 48 hours of being granted access to the Site (CEQA Guidelines, CCR section 15064.5(e); HSC section 7050.5).

ENVIRONMENTAL SETTING (BASELINE):

There are no known tribal cultural resources, as defined in PRC Div. 13 Section 21074, on the Proposed Project Site or in its immediate vicinity. The Proposed Project Site has been used continuously for over 70 years for storage of sludge.

DTSC complied with the 2014 Assembly Bill 52 (AB52). DTSC provided written notification to seven tribes on the Tribal Consultation List from the NAHC regarding the Proposed Project on October 5, 2021. The notice included a brief project description, project location, and lead agency's contact information. DTSC did not receive interest from any Tribal governments.

APPLICABLE THRESHOLDS OF SIGNIFICANCE:

Tribal cultural resources are defined as either 1) sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either included or determined to be eligible for inclusion in the California Register of Historical Resources (California Register) or listed in a local register of historical resources or 2) a resource determined by the lead agency, in its discretion and supported by substantial evidence, is a tribal cultural resource (OPR, 2017).

To be eligible for the California Register, a prehistoric or historic-period property must be significant at the local, state, and/or federal level under one or more of the following four criteria:

1. Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
2. Is associated with the lives of persons important in our past;
3. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or,
4. Has yielded, or may be likely to yield, information important in prehistory or history.

A resource eligible for the California Register must meet one of the criteria of significance described above and retain enough of its historic character or appearance (integrity) to be recognizable as a historical resource and to convey the reason for its significance. It is possible that a historic resource may not retain sufficient integrity to meet the criteria for listing in the National Register, but it may still be eligible for listing in the California Register.

ENVIRONMENTAL STUDIES PERFORMED AND METHODOLOGY:

Based on the unlikely potential for unknown cultural resources to be located on the Proposed Project Site, no environmental studies relating to cultural resources were prepared for the Proposed Project.

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:

   There are no known tribal cultural resources, as defined in PRC Section 21074, on the Proposed Project Site or in its immediate vicinity. As described in the Baseline Environmental Conditions, the Proposed Project Site has been used continuously for over 70 years for sludge storage. Based on the Proposed Project Site location, history, and absence of cultural resource findings during prior Site work, it is not likely that historical resources would be identified or impacted during remedial actions. However, if tribal cultural resources are discovered during remedial actions, work would stop in that area 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 and other agencies and Native American representatives, as appropriate.

   Specifically, in the event of discovery of human remains during ground-disturbing activities, work within 25 feet of the discovery shall stop immediately and the County Coroner shall be notified to determine its origin. The County Coroner would determine disposition within 48 hours. If the remains are Native American, the County Coroner would be responsible for contacting the NAHC within 24 hours. The NAHC would identify and notify the person(s) who might be the most likely descendent, who would make recommendations for the appropriate and dignified treatment of the remains (PRC Div. 5 section 5097.98). The descendants shall complete their inspection and make recommendations for treatment within 48 hours of being granted access to the Site (CEQA Guidelines, CCR section 15064.5(e); HSC section 7050.5).

   In the event of discovery of potential cultural or archaeological resources, excavation activities would be immediately suspended in the immediate area and surrounding 25 feet along with contacting and informing the DTSC Project Manager [Nicholas Ta at (714) 484-5381; Nicholas.ta@dtsc.ca.gov]. After discussion with

their Tribal Chairperson or respective Cultural Resources Managers or Tribal Historic Preservation Officers and in collaboration with DTSC (including the Office of Environmental Equity) and the property owner, any measures deemed necessary to record and/or protect the cultural or archaeological resource(s) would be implemented.

Conclusion:

The Proposed Project would not include the demolition, elimination, or manipulation of a known tribal cultural resource. In addition, the finding of an unknown tribal cultural resource during implementation of remedial actions is unlikely based on the site history and conditions and absence of findings during prior onsite work. However, the proposed project includes measures that would be implemented if discovery of unknown tribal cultural resource were uncovered during remedial actions. The proposed project would not cause a substantial adverse change in the significance of a tribal cultural resource and impacts would be less than significant.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☒ Less Than Significant Impact

☐ 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 Proposed Project Site or in its immediate vicinity. The Proposed Project Site been used continuously for over 70 years for sludge storage.

On October 5, 2021, the DTSC formally notified the seven tribes identified in the NAHC listing. By December 6, 2021, no tribal Government responded to the AB52 Consultation letter and requested consultation. In addition, the tribes communicated with did not identify any known tribal cultural resources that may be affected by the Proposed Project. However, the Proposed Project 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 remedial actions, work would stop in that area 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 and other agencies and Native American representatives, as appropriate. As previously stated, the Proposed Project Site has been previously disturbed and no information regarding the presence of known tribal cultural resources has been provided to the DTSC from the contacted tribes or from cultural resource surveys or records.

Conclusion:

As no known tribal cultural resources occur at the Proposed Project Site or would be affected by the Proposed Project, and implementation of the contingency set forth in Section 18 (a)(i) would reduce impacts to unknown tribal cultural resources during excavation activities, impacts would be less than significant.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☒ Less Than Significant Impact

☐ No Impact

References Used:

Governor's Office of Planning and Research (OPR). 2017. Technical Advisory, AB52 and Tribal Cultural Resources in CEQA. June 2017.

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):

No laws, ordinances, regulations, or standards protecting utilities and service systems resources are applicable to the Proposed Project.

ENVIRONMENTAL SETTING (BASELINE):

Golden State Water Company (GSWC) serves the City of Gardena. Water delivered to customers in the Proposed Project area includes a blend of groundwater pumped from the West and Central Coast Groundwater Basins and imported water from the Colorado River Aqueduct and State Water Project (imported and distributed by Metropolitan Water District of Southern California (MWD)). In 2002 approximately 40 percent of the Southwest District's (a water district of GSWC) potable water was from groundwater wells and approximately 60 percent from imported water from MWD. According to the GSWC there is sufficient water supply capacity to serve the City of Gardena and local communities. Currently, 58,800 gallons per minute (gpm) of water is available in the Southwest System through wells and connections with MWD. Current maximum daily demand plus fire flow is 39,000 gpm.

The City of Gardena, along with the County Sanitation Districts of Los Angeles County (Sanitation Districts) provide wastewater service to the residents of the City. Wastewater generated in the City are conveyed to the treatment facilities at the District's Joint Water Pollution Control Plant (JWPCP) located in the City of Carson, which is part of a larger regional treatment system. The JWPCP has a design capacity of 385 million gallons per day (mgd) and currently processes an average flow of 319.9 mgd.

Phoenix Waste and Recycling Services provides refuse and recycling service for single family homes, apartments buildings, condominiums and townhouses (2 to 4 units) in the City of Gardena. Waste Resources of Gardena provides solid waste collection service for businesses and apartments, condominiums and townhouses with more than five units in the City. Phoenix Waste's collected waste is transported to the Commerce Refuse-To-Energy

Facility transformation station located at 5926 Shella Street in the City of Commerce and Waste Resources' waste is transported to the Southeast Resources Recovery Facility (SERRF) located at 120 Henry Ford Avenue in the City of Long Beach. In addition, the Carson Transfer Station and Materials Recovery Facility located at 321 W. Francisco Street in the City of Carson is used as well.

Waste is then disposed at numerous landfills, including the Puente Hills Landfill No. 6 located at 2800 South Workman Mill Road, Whittier. According to information from the City, the current household waste disposal averages approximately 21,000 tons per year (one-quarter of the City's overall waste disposal) and commercial disposal averages approximately 62,000 tons per year (three-quarters of the City's overall disposal).

APPLICABLE THRESHOLDS OF SIGNIFICANCE:

The list of utilities and service systems resource effects that may be considered significant contained in Appendix G of the CEQA Guidelines (Environmental Checklist) was used to establish a threshold of significance.

ENVIRONMENTAL STUDIES PERFORMED AND METHODOLOGY:

Based on the less than significant impacts to utilities and service systems resources in or near the Proposed Project Site, no environmental studies relating to utilities and service systems resources were prepared for the Proposed Project.

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:

The proposed remedial actions would not create the need for or result in the construction of new or expanded water or wastewater treatment, electric power, natural gas, or telecommunications facilities.

The construction of the soil cap would affect the current drainage pattern slightly; however, the intended design would direct runoff to prevent ponding and percolation. Runoff from the cap would be captured by a v-shaped trench filled with soil and concrete to form surface water drainage ditches.

Runoff from the Site would be managed in accordance with all applicable laws and regulations and the construction of the new storm water drainage features would be performed in accordance with the Construction SWPPP.

Conclusion:

Activities associated with the proposed project would not require new or expanded water or wastewater treatment, electric power, natural gas, or telecommunications facilities. Impacts to these facilities would be less than significant.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☒ Less Than Significant Impact

☐ 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:

Implementation of remedial actions would require approximately four months to complete. The primary source of water required during construction activities would be supplied by the existing onsite non-potable fire

protection water system. If needed, additional water would be transported to the Proposed Project Site by water trucks.

Conclusion:

Sufficient water supplies from existing entitlements and resources onsite are available to serve the needs of remedial actions during the anticipated 4-month construction period. The remedial actions would not create long-term, future demand for water supply beyond existing conditions. Impacts to water supplies would be less than significant.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☒ Less Than Significant Impact

☐ 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:

Implementation of remedial actions would not generate wastewater that would require a wastewater treatment provider. Wastewater generated during equipment decontamination activities would be containerized, profiled, and disposed at an appropriate offsite facility.

Conclusion:

Construction activities associated with remediation of the Proposed Project Site would not create a demand for wastewater treatment at any wastewater treatment provider. No impact to a wastewater treatment provider would occur.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ 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 associated with remedial actions would comprise of approximately 200 cubic yards of contaminated soil. Contaminated soil would be transported to an appropriate facility for disposal based on final waste characterization results. Facilities considered for disposal of contaminated soil include:

- Clean Harbors Landfill in Buttonwillow, California; or
- US Ecology Landfill in Beatty, Nevada;

Each of these facilities have sufficient permitted capacity to receive the anticipated 200 cubic yards of contaminated soil; however, the capacity to accept would be confirmed in advance of transport to a facility.

Conclusion:

Solid waste generated by remedial actions would be served by a landfill with sufficient permitted capacity to accept the contaminated soil. A less-than-significant impact would occur to solid waste facilities.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☒ Less Than Significant Impact

☐ No Impact

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

Impact Analysis:

Implementation of remedial actions would generate approximately 200 cubic yards of contaminated soil. Disposal of contaminated soil and asphalt/base rock would comply with all federal, state, and local statues and regulations related to solid waste including, but not limited to: characterization, storage, labeling, transport, and disposal.

Conclusion:

Disposal of contaminated soil and asphalt/base rock would comply with all federal, state, and local statues and regulations related to solid waste. Therefore, no impacts related to compliance with federal, state, and local management and reduction statutes and regulations related to solid waste would occur.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ No Impact

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):

No laws, ordinances, regulations, or standards protecting wildfire resources are applicable to the Proposed Project.

ENVIRONMENTAL SETTING (BASELINE):

State Responsibility Areas are boundaries adopted by the Board of Forestry and Fire Protection and are areas where the California Department of Forestry and Fire (CAL FIRE) has a financial responsibility for fire suppression and prevention. Review of the California State Responsibility Area Viewer indicate the Proposed Project Site is not located in a Very High Hazard Severity Zone (VHFHSZ) but is located in a Local Responsibility Area. The closest area classified as a VHFHSZ is located 18 miles northwest of the Proposed Project Site (CAL FIRE 2007).

APPLICABLE THRESHOLDS OF SIGNIFICANCE:

The list of wildfires resource effects that may be considered significant contained in Appendix G of the CEQA Guidelines (Environmental Checklist) was used to establish a threshold of significance.

ENVIRONMENTAL STUDIES PERFORMED AND METHODOLOGY:

Based on the less than significant impacts to wildfire resources in or near the Proposed Project Site, no environmental studies relating to wildfire resources were prepared for the Proposed Project.

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:

Please refer to the analysis provided in Section 9(f) of this Initial Study.

Conclusion:

Please refer to the conclusion provided in Section 9(f) of this Initial Study.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☒ Less Than Significant Impact

☐ 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 Proposed Project Site is not located in an area with environmental conditions conducive to wildland fires. The project site is in an urban area lacking dry vegetation. However, operation of construction equipment on the during remedial actions has the limited potential to spark a fire. However, construction activities would implement BMPs which address fire prevention methods such as:

- restricting vehicles from driving or parking on dry vegetation during fire sensitive times of the year; and
- wetting dry construction areas before commencing activities, and wetting throughout the day, as appropriate.

Conclusion:

Although construction equipment has a minimal potential to spark a fire during remedial actions, implementation of BMPS would substantially limit the potential for a wildland fire that exposes people or structures to a significant risk of loss, injury or death to occur. Impacts from wildland fires during implementation of the remedial actions are considered less than significant.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☒ Less Than Significant Impact

☐ 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:

Implementation of remedial actions would not require the installation or maintenance of associated infrastructure (e.g., fuel breaks, emergency water sources, power lines, other utilities) that could exacerbate fire risk or could result in temporary or ongoing impacts to the environment. The Remedial actions would require construction of temporary access roads of compacted clean soil or imported clean gravel to facilitate access to work areas. However, the temporary access roads would overall reduce wildfire risk during the implementation of remedial actions by incorporating soil or gravel.

Conclusion:

The proposed remedial actions would not install any infrastructure that could exacerbate fire risk or could result in temporary or ongoing impacts to the environment. No impact would occur.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☐ Less Than Significant Impact

☒ 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:

Landslides tend to occur where slopes are steeper with higher relief. The Proposed Project Site is flat with very little relief. The proposed remedial actions would not significantly change the existing slope of the Proposed Project Site.

In addition, construction of the soil cap would affect the current drainage pattern slightly; however, the intended design would direct runoff to prevent ponding and percolation. Runoff from the cap would be captured by a v-shaped trench filled with soil and concrete to form surface water drainage ditches.

Conclusion:

The proposed remedial actions would not create steep slopes or disturb any landslide-prone areas. In addition, proposed remedial actions would not expose people or structures to risk from uncontrolled storm water runoff. These impacts are considered less than significant.

☐ Potentially Significant Impact

☐ Less Than Significant With Mitigation Incorporated

☒ Less Than Significant Impact

☐ No Impact

References Used:

California Department of Forestry and Fire (CAL FIRE), 2007. Contra Costa County Fire Hazard Severity Zone Maps for State Responsibility Area. November. https://osfm.fire.ca.gov/divisions/wildfire-planning-engineering/wildland-hazards-building-codes/fire-hazard-severity-zones-maps/ (Accessed April 28, 2021).

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

Attachment A – Air Quality

Attachment B - Noise