

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: In Situ Thermal Remediation Work Plan, 2136 South Hathaway Street		SITE CODING: 400928-48
PROJECT ADDRESS: 2136 South Hathaway Street	CITY: Santa Ana	COUNTY: Orange
PROJECT SPONSOR: Embee Processing	CONTACT: James Watson	PHONE: (714) 546-9842
APPROVAL ACTION UNDER CONSIDERATION BY DTSC:		
<input type="checkbox"/> Initial Permit Issuance <input type="checkbox"/> Permit Re-Issuance <input type="checkbox"/> Permit Modification <input type="checkbox"/> Closure Plan <input checked="" type="checkbox"/> Removal Action Workplan <input type="checkbox"/> Remedial Action Plan <input type="checkbox"/> Interim Removal <input type="checkbox"/> Regulations <input type="checkbox"/> Corrective Measure/Study/Statement of Basis <input type="checkbox"/> Other (specify):		
STATUTORY AUTHORITY:		
<input checked="" type="checkbox"/> California H&SC, Chap. 6.5 <input type="checkbox"/> California H&SC, Chap. 6.8 <input type="checkbox"/> Other (specify):		
DTSC PROGRAM/ADDRESS: Site Mitigation and Restoration Program 5796 Corporate Avenue Cypress, California 90630	CONTACT: Angela Turner Project Manager Angela.turner@dtsc.ca.gov	PHONE: (714) 484-5477

PROJECT DESCRIPTION:

The Department of Toxic Substances Control (DTSC) is proposing a In Situ Thermal Remediation (ISTR) Work Plan (Work Plan) for the remediation of volatile organic compounds (VOCs) in soil and groundwater at the Embee Facility (Site). The remedial action would involve using heat to volatilize VOCs in and groundwater which are then captured in the gas phase using vapor extraction.

Because of its effectiveness at removing VOCs from low permeability soils, ISTR is considered the most effective available alternative for treatment of separate phase VOCs in heterogeneous formations and can also be implemented to the full depth required at the Site. Further, the heat would enhance the natural attenuation by increasing the rate of microbial biodegradation thereby allowing for biodegradation of VOCs on the margin of the treatment area where boiling temperatures would not be achieved. ISTR would also be installed and operated under the existing structures at the site without significant disruption to facility operations.

ISTR can be operated under an active facility and is anticipated to achieve treatment within 34 months of startup.

BACKGROUND:

The Site is located at 2136 South Hathaway Street in the City of Santa Ana, Orange County, California (refer to Figure 1). The site is surrounded by existing industrial properties. The Site encompasses approximately 225,000 square feet (5.2 acres) and includes several buildings and associated structures (refer to Figure 2).

The site was historically used for metal plating and finishing which included the use of chromium, tin, nickel, and copper. Tetrachloroethylene (PCE), trichloroethylene (TCE), and 1,1,1-trichloroethane (TCA) were historically used as vapor degreasing agents in the grinding and metal finishing operation. These vapor degreasers led to soil and groundwater impacts on the western side of the property where VOCs are present in low permeability shallow zone clay soils and interbedded clays, silts, and sands in the deeper zone.

VOCs, chromium (including hexavalent chromium), and perchlorate are the primary contaminants of concern (COCs) at the Site and the focus of ongoing interim measures. Figure 2 shows the areas of concern where COCs have been historically stored, used in processes, or observed in soil and/or groundwater along with the maximum extent of the treatment areas.

PROJECT ACTIVITIES:

The project Site has been divided into three zones (Vadose Zone, A Zone, and C Zone) to implement remediation activities. For purpose of defining the treatment zone, the vadose zone extends to approximately 20 feet below grade surface (bgs), the A Zone has been assumed to extend from 20 feet to 40 feet bgs, and the C Zone from 40 feet to 60 feet bgs. The Work Plan remediation objective would be to reduce the concentration of PCE and TCE in groundwater located under the A Zone to less than 100 micrograms per liter ($\mu\text{g/L}$) and to reduce the concentration of PCE and TCE in the more-permeable groundwater in the C Zone to less than 50 $\mu\text{g/L}$. Within the vadose zone, the goal would be to reduce chlorinated VOCs (CVOC) concentrations in soil by a percentage similar to that of the underlying A Zone groundwater. The Site final cleanup goals would be risk-based for protection of onsite and offsite receptors, as well as the beneficial use of groundwater.

The project would use the method of ISTR known as electrical resistance heating (ERH). ERH passes an electrical current through the soil and groundwater that requires treatment. The electrical current warms the soil and then boils a portion of the soil moisture into steam. Specifically, the electrical energy would evaporate the target contaminants and provide steam as a carrier gas to sweep CVOCs to vapor recovery (VR) screens. The extracted steam would then be condensed above grade and the residual air would be cooled to ambient conditions. The recovered CVOC vapors would be treated using conventional methods such as granular activated carbon (GAC). Water from the condenser will be conveyed through two liquid-phase 5,000-pound GAC vessels plumbed in series. At the project Site, the subsurface would be energized with sufficient electrical current to produce enough steam to sweep the average soil pore 500 to 1,000 times and remove the volatile contaminants.

The key activities that would be completed for the installation of the ISTR treatment system include:

- Installing electrodes, recovery wells, sensor wells, and monitoring points.
- Constructing a vapor extraction system.
- Installing field piping, electrical, and controls systems.
- Installing vapor and groundwater treatment systems.

Installation of Wells

Well Layout

The layout of the wells (i.e., electrode, soil vapor extraction, temperature and pressure sensors, groundwater monitoring) that would be utilized during the ISTR implementation would include 64 electrodes completed with in-well vapor recovery, 9 temperature sensor wells, and 9 dual completion (shallow and deep) groundwater monitoring wells. The ISTR electrode wells will be spaced on approximate 14 to 16-foot centers throughout the treatment area. Electrode spacing would vary depending on the area where it is being installed. The soil vapor extraction (SVE) wells would be co-located with the electrodes to extract vapors and steam generated during the heating process.

Temperature sensors would be used to monitor in situ temperatures and heating progress within the treatment area. Sensor wells would be constructed of 1.5-inch-diameter, Schedule 40 carbon steel pipe, and would extend to approximately 30 and 60 feet bgs depending on the target depth of the treatment area. Resistance Temperature Detectors would be installed within the interior of the well at 5-foot intervals from 5 to 30 or 60 feet bgs.

Pressure monitoring wells would be co-located with the temperature monitoring points and would be utilized to demonstrate pneumatic (vacuum) control of the treatment area. Pressure monitoring wells would be installed to a total depth of approximately 20 feet bgs and would be screened from 5 to 20 feet bgs. The wells would be constructed using 1-inch-diameter, 0.010-inch wire-wrapped stainless-steel screen from 5 feet bgs to 20 feet bgs, and 1-inch-diameter, Schedule 40 carbon steel pipe from 20 ft bgs to grade. The annulus surrounding the wire-wrapped screen would be backfilled with #2/12 Lonestar sand, or equivalent. A neat cement seal would be installed from 5 feet bgs to grade surface. Pressure/vacuum measurements would be obtained from these wells on a regular basis throughout the remediation to confirm the unsaturated zone is not becoming pressurized and contributing to vapor migration outside of the capture zone of the SVE system.

Groundwater monitoring well pairs would monitor groundwater concentrations within and down gradient of the treatment area. Groundwater monitoring wells would be installed in the 2139 South Santa Fe Street building area (four well pairs within the treatment area) and in the 2148 South Hathaway Street building area (two well pairs within the treatment area, and two well pairs down gradient of the treatment area). One well pair would be installed within the 2150 South Santa Fe Street treatment area. The monitoring wells would be constructed using 2-inch-diameter, 0.010-inch, wire-wrapped stainless-steel screen from approximately 15 to 35 feet bgs and 45 to 60 feet bgs to monitor the A and C Zones, respectively. All of the wells would be finished with stainless-steel casing if located within the heated volume. The surface completion of each well would include National Pipe Tapered fittings so that the well casing can be properly sealed with

a specialty cap during operations. The annular space surrounding the screen intervals to 2-feet above the top of the screens would be backfilled with #2/12 Lonestar sand, or equivalent. Neat cement seal would be installed from the sand to grade surface.

Well Drilling and Installation

Wells and electrodes would be installed using solid and/or hollow-stem flight augers, sonic drilling methods (for angled borings), and hand auger for shallow electrodes in the process areas of each building. Wells drilled with solid flight augers would be installed by advancing the augers to total depth, removing the augers from the borehole, then constructing the well casing and annular backfill in the open boring. Wells drilled using hollow-stem augers or sonic would be installed by advancing the augers to total depth, constructing the well casing inside the auger, and simultaneously removing the augers from the borehole while backfilling the annulus.

Waste Management

Drill cuttings would be managed to minimize the volume of hazardous waste generated. Drill cuttings from each soil boring would be transferred to a plastic-lined roll-off box, which would be stored near the proposed ISTR treatment compound. The soil bin would be closed and locked at the end of each workday. The soil bin and drums would be labeled to identify the type of waste and potential hazards associated with its content. Soils would be characterized in accordance with the disposal facility's permit requirements and applicable state and federal regulations.

Decontamination water generated during system installation, as a result of routine maintenance activities, and during decommissioning of the equipment would be containerized at the end of each day and disposed based on the classification of the waste to a certified disposal facility.

Piping and Electrical Systems

The piping and electrical work for the ISTR treatment system would be constructed after the electrode and VR wells are in place. Because of the variability of access in different parts of the treatment area, the system wells (i.e., heating, recovery, sensor, monitoring wells), piping, and electrical systems within the target treatment area would be constructed with aboveground completions where possible and below grade everywhere else.

A vacuum header pipe system would be utilized for the VR wells in the treatment area. The system would consist of a main header trunk line with branches extending to the individual extraction wells. The system would be constructed of carbon steel pipe with temperature- and chemical-resistant hose connections to allow sufficient leak-free operation, and flexibility for thermal expansion during operation.

A power control unit (PCU) would be constructed within the treatment compound to provide power to the electrodes. The PCU would be powered by an electrical connection through Southern California Edison (SCE). Electricity from the PCU would be adjusted to the proper voltage to deliver to the electrodes. Conductors would be installed from the PCU to the electrodes. Conductors would be installed either above or below grade depending on current usage of the area.

Vapor Recovery System

The vapor-phase effluent would pass through a heat exchanger designed to cool the extracted vapors and condense steam out of the vapor stream. The heat exchanger would be cooled by cool water fed from a cooling tower located in the treatment system compound. The vapor-phase effluent would then pass through another knockout tank to remove the condensate before passing through the main vacuum blower for the VR system. The effluent from the vacuum blower would be passed through a series of in-line, with a minimum of 2,000-pound vapor-phase GAC vessels.

Atmospheric discharge would be in accordance with the permit to be obtained from the SCAQMD and would be monitored to ensure compliance with permit conditions. A standby GAC vessel would also be available if monitoring data suggests that it would be needed to comply with the permit conditions. Liquids removed from the vapor stream at the knockout tanks would be discharged to the sanitary sewer under a required permit from the Orange County Sanitary District. The permit would allow for discharge of the condensate to the sanitary sewer using an existing sewer inlet located at 2148 South Hathaway Street. If necessary, for permit conditions, water from the condenser will be conveyed through two liquid-phase GAC vessels plumbed in series.

Lay Down and Compound Areas

The ISTR treatment equipment compound would be located to the west of 2148 South Hathaway Street. Piping and cables to the treatment region would be routed to the treatment compound. Figure 3 shows the compound location and conceptual layout, located approximately 150 feet west of the treatment area.

Equipment lay-down areas would be identified and delineated in the parking lot west of 2139 South Santa Fe Street. Lay-down areas would be used to secure equipment and supplies during construction. The lay-down areas would be located

in low-traffic areas to minimize disruption but would need to be in close proximity to the construction area. Lay-down areas would also be fenced off prior to construction.

Well Abandonment

Existing wells located on the site within and immediately adjacent to the remediation treatment area would require abandonment because they are constructed with polyvinyl chloride (PVC) casing, which would be damaged at the subsurface temperatures that will be achieved during ISTR. Well abandonment would follow applicable Orange County Health Care Agency (OCHCA) and California regulations.

Permits

The ISTR system will require a separate power drop provided by SCE, an air permit from the South Coast Air Quality Management District (SCAQMD) for the soil vapor extraction and carbon treatment system, as well as a wastewater permit from the Orange County Sanitation District (OCSD). Permits would be required from the OCHCA before existing wells are abandoned. All permits and power requests would be submitted to the requisite agency for approval.

Schedule

Construction activities would take a total of approximately 3 to 6 months.

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 Santa Ana.

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:

Embee Processing. 2022. *In Situ Thermal Remediation Work Plan 2136 South Hathaway Street, Santa Ana, California*. Prepared by Stantec. March 14, 2022.

Embee Processing. 2023. *Interim Measures Work Plan: In Situ Thermal Remediation Work Plan 2136 South Hathaway Street, Santa Ana, California*. Prepared by Stantec. February 24, 2023.

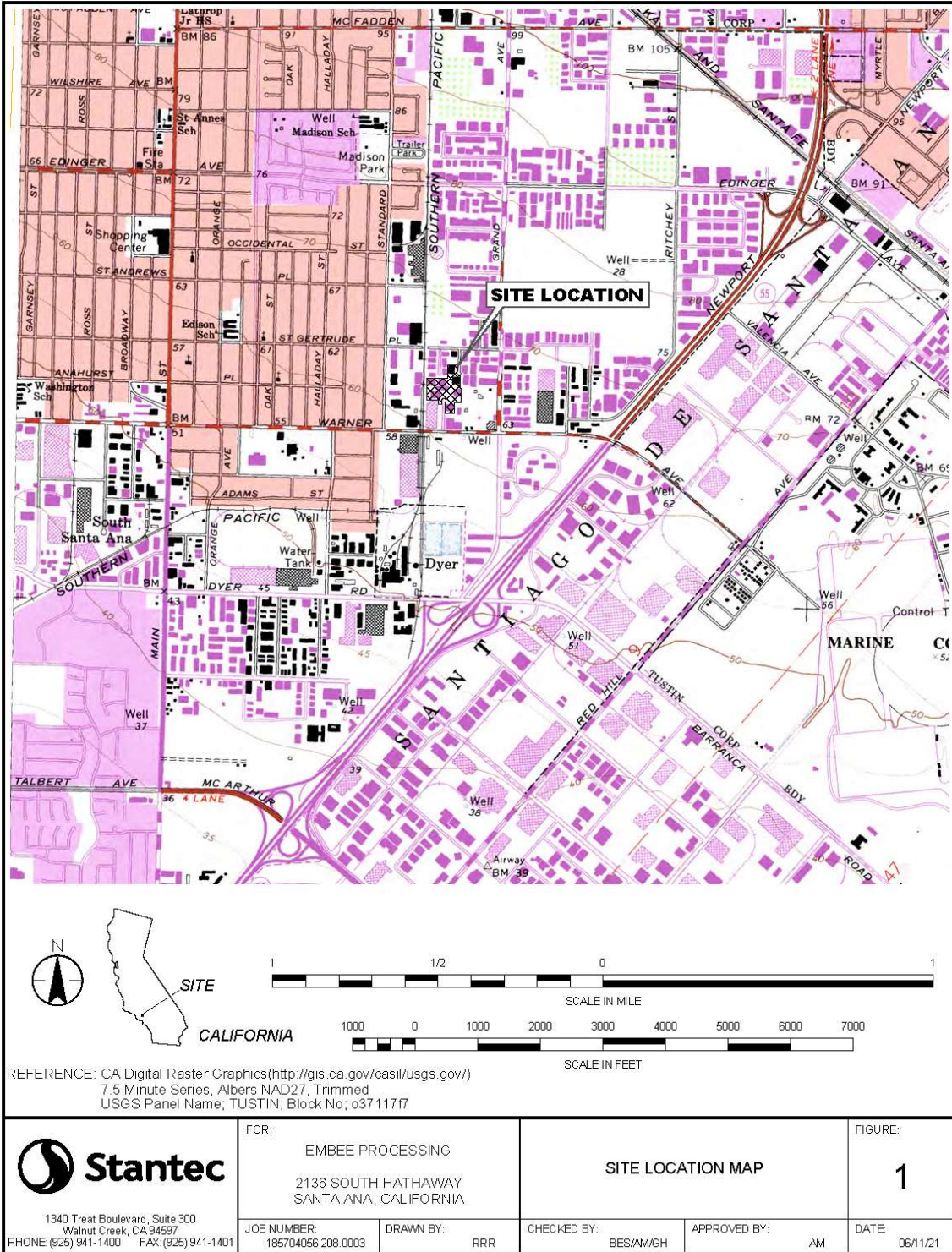
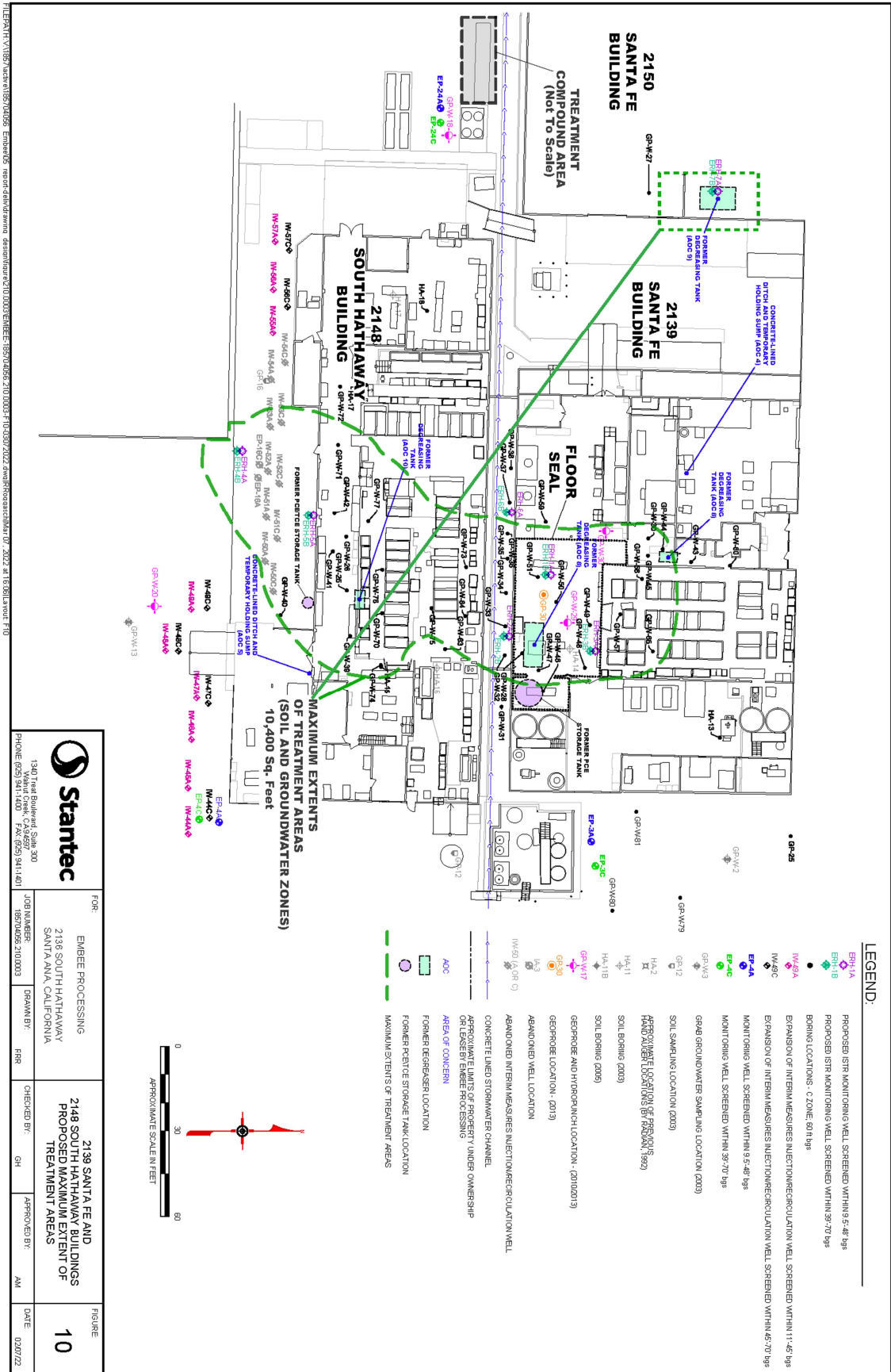


Figure 1
Project Location



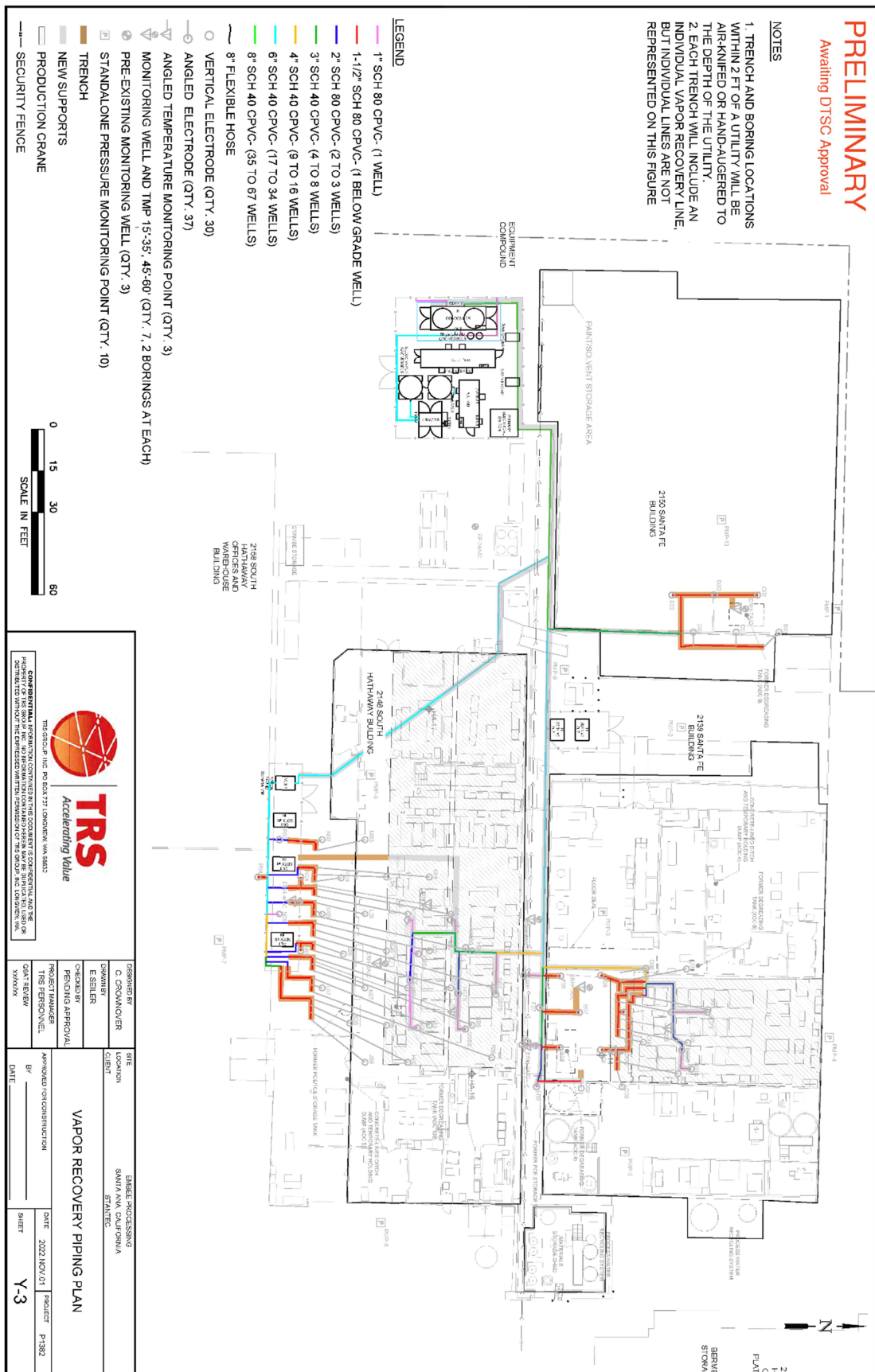


Figure 3
Compound Location and Conceptual Layout

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Attachment A – Air Quality

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.

<input type="checkbox"/>	Aesthetics	<input type="checkbox"/>	Agriculture and Forestry	<input type="checkbox"/>	Air Quality
<input type="checkbox"/>	Biological Resources	<input type="checkbox"/>	Cultural Resources	<input type="checkbox"/>	Energy
<input type="checkbox"/>	Geology/Soils	<input type="checkbox"/>	Greenhouse Gas Emissions	<input type="checkbox"/>	Hazards and Hazardous Materials
<input type="checkbox"/>	Hydrology/Water Quality	<input type="checkbox"/>	Land Use/Planning	<input type="checkbox"/>	Mineral Resources
<input type="checkbox"/>	Noise	<input type="checkbox"/>	Population/Housing	<input type="checkbox"/>	Public Services
<input type="checkbox"/>	Recreation	<input type="checkbox"/>	Transportation	<input type="checkbox"/>	Tribal Cultural Resources
<input type="checkbox"/>	Utilities/Service Systems	<input type="checkbox"/>	Wildfire	<input type="checkbox"/>	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:

<input checked="" type="checkbox"/>	I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
<input type="checkbox"/>	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.
<input type="checkbox"/>	I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
<input type="checkbox"/>	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.
<input type="checkbox"/>	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.



Preparer's Signature

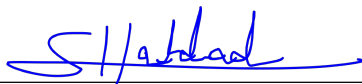
April 23, 2024

Date

Angela Turner
Preparer's Name

Project Manager
Preparer's Title

(714) 484-5477
Phone #



Branch Chief Signature

4.24.24

Date

Shahir Haddad, PE
Branch Chief Name

Chief
Branch Chief Title

(714) 484-5368
Phone #

EVALUATION OF ENVIRONMENTAL IMPACTS

- 1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
- 2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.
- 4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less-than-significant level (mitigation measures from "Earlier Analyses," as described in (5) below, may be cross-referenced).
- 5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
 - a) Earlier Analysis Used. Identify and state where they are available for review.
 - b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c) Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
- 6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
- 7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
- 8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.
- 9) The explanation of each issue should identify:
 - a) the significance criteria or threshold, if any, used to evaluate each question; and
 - b) the mitigation measure identified, if any, to reduce the impact to less than significance.

ENVIRONMENTAL IMPACT ANALYSIS

1. AESTHETICS				
Except as provided in Public Resources Code Section 21099, would the project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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 Santa Ana General Plan

The Urban Design Element within the City of Santa Ana General Plan, public review draft April 2022, does not contain any policies related to visual character that are applicable to the proposed cleanup activities.

ENVIRONMENTAL SETTING (BASELINE):

The proposed project site is located in the center of an existing industrial area of the City of Santa Ana at the northern end of South Hathaway Street. The proposed project site is a historically industrial site and was used for metal plating and finishing. Tetrachloroethylene (PCE), trichloroethylene (TCE), and 1,1,1-trichloroethane (TCA) were historically used as vapor degreasing agents in the grinding and metal finishing operation. Visible features of the proposed project site are consistent with existing, surrounding industrial 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 the use of in situ thermal remediation (ISTR), known as electrical resistance heating (ERH), which passes an electrical current through the soil and groundwater that requires treatment. The key activities that would be completed for the installation of the ISTR treatment system would include installing electrodes, recovery wells, sensor wells, and monitoring points; constructing a vapor extraction system; installing field piping, electrical, and controls systems; and installing vapor and groundwater treatment systems.

New above ground structures would be constructed temporarily with implementation of the proposed project. However, these structures would not be distinguishable from existing industrial infrastructure on the project site and on the adjacent properties. Therefore, no adverse effects on the view of the nearest scenic ridge or local vantage points would occur. The nearest scenic vista (Santiago Peak) is approximately 19 miles away to the east. Temporary construction activities at the proposed project site would occur for approximately 3 to 6 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 vista. 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 91, located over 5 miles to the northeast 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 6 miles to the west from the site (CalTrans, 2022). There are no views of the proposed project site from these sections of Route 91 or Highway 1.

The proposed project site has been used continuously since 1962 for a metal finishing business at its current location and currently is used for ongoing 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 South Hathaway Street and South Santa Fe Street. The proposed project site has been used historically for industrial operations and the visual character of the proposed project site currently reflects the site's long-term uses.

Construction activities would occur for approximately 3 to 6 months at the proposed project site. Even though implementation of the proposed remedial actions would minimally alter the visual character or quality of the proposed project site, the remedial actions would not conflict with any applicable zoning and other regulations governing scenic quality.

Conclusion:

Based on the temporary nature of the construction activities at the proposed project site, no impact related to conflicting with applicable zoning and other regulations governing scenic quality at 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 Standard Avenue to the west of the proposed project site. Views towards the project site are blocked by industrial buildings and these residents do not have any direct views of the 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 no 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 Santa Ana. 2022. City of Santa Ana General Plan. <https://www.santa-ana.org/documents/april-2022-general-plan-urban-design-element/> (Accessed May 2022).

2. AGRICULTURE AND FORESTRY RESOURCES				
<p>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.</p>				
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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 1962 for a metal finishing business at its current location.

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 over 10 miles from the proposed project site (DRLP, 2022). 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:

There is no farmland or vacant/fallow lands located near the proposed project site. Therefore, project-related activities would not have the ability to conflict with any Williamson Act contracts. The proposed project site is zoned for industrial 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. 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 May 2022)

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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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 O₃ protection measures, and enforcement provisions. Under the Clean Air Act, NAAQS are established for the following criteria pollutants: O₃, CO, NO₂, SO₂, PM₁₀, 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 March 2023. 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 2023a). 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 (PM₁₀) (SCAQMD, 2023b).

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)
NO _x	100
VOC	75
PM ₁₀	150
PM _{2.5}	55

SOx	150
CO	550
Lead	3

Notes:

NOx = nitrogen oxide

VOC = volatile organic compound

PM₁₀ = particulate matter less than 10 microns in sizePM_{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 2022.1.1.14) was run to determine if project-related air emissions exceed SCAQMD Air Quality Significance Thresholds (March 2023). 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,
- Augers,
- Backhoes, and
- Generators.

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 (PM₁₀ 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 SCAQMD Air Quality Significance Thresholds (March 2023), using the California Emissions Estimator Model ® (CalEEMod, Version 2022.1.1.14) 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?
NO _x	100	5.0	NO
VOC	75	0.5	NO
PM ₁₀	150	1.0	NO
PM _{2.5}	55	0.7	NO
SO _x	150	<0.1	NO
CO	550	5.0	NO
Lead	3	N/A	N/A

Notes:

Lb = pounds

NO_x = nitrogen oxide

VOC = volatile organic compound

PM₁₀ = particulate matter less than 10 microns in sizePM_{2.5} = particulate matter less than 2.5 microns in sizeSO_x = sulfur oxide

CO = carbon monoxide

As shown in Table 3.2, project-related construction activities would generate air emissions below 2023 SCAQMD Air Quality Significance Thresholds for construction impacts. In addition, the proposed ISTR system would require an air permit from the SCAQMD for the soil vapor extraction and carbon treatment system.

Conclusion:

The CalEEMod results indicate that the project-related emissions would be below the 2023 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, PM₁₀, and PM_{2.5} (SCAQMD, 2023b). 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 2023 SCAQMD Air Quality Significance Thresholds.

Health Effects of Criteria Air Pollutants

Reactive organic gases (ROG) and nitrous oxides (NO_x) are precursors to ozone (O₃), for which the South Coast Air Basin (SCAB) is designated as nonattainment with respect to the NAAQS and CAAQS. The health effects associated with O₃ are generally associated with reduced lung function. The contribution of ROG and NO_x to regional ambient O₃ concentrations is the result of complex photochemistry. The increases in O₃ concentrations in the SCAB due to O₃ 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 O₃ concentrations would also depend on the time of year that the ROG emissions would occur because exceedances of the O₃ 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 O₃ precursors is speculative due to the lack of quantitative methods to reliably and meaningfully assess this impact. Thus, a project's ROG and NO_x 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 O₃ concentrations and the associated health effects.

Health effects related to particle pollution (PM₁₀ 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_{10-2.5}) 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 2023 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 industrial uses. The closest sensitive receptors (Century High School, Madison Elementary School, Edison Elementary School) are located approximately 1 mile distant to the proposed project site. Activities associated with the proposed remedial actions would not generate any substantial pollutant concentrations. Therefore, the project would not have the ability to expose sensitive receptors to substantial pollutant concentrations.

Conclusion:

Schools are located within 1 mile from the proposed project site. However, implementation of remediation actions would not involve activities with the potential to expose sensitive receptors to substantial pollutant concentrations and no impact would occur.

- 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 an in situ thermal remediation (ISTR), known as electrical resistance heating (ERH), which passes an electrical current through the soil and groundwater that requires treatment. The key activities that would be completed for the installation of the ISTR treatment system would include installing electrodes, recovery wells, sensor wells, and monitoring points; constructing a vapor extraction system; installing field piping, electrical, and controls systems; and installing vapor and groundwater treatment systems. The proposed ISTR system would require an air permit from the SCAQMD for the soil vapor extraction and carbon treatment system. Compliance with the SCAQMD air permit would ensure emissions from the vapor treatment system do not adversely affect a substantial number of people.

Conclusion:

Project-related odors during operation of the ISTR during remedial actions activities would be actively monitored to ensure compliance with required air permit(s) and, therefore, no discernable odors would be 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). 2023a. *Air Quality Analysis Handbook*. <http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook> (Accessed July 11, 2023)
- SCAQMD. 2023b. *National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS) Attainment Status for South Coast Air Basin*. <http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/naaqs-caoqs-feb2016.pdf> (Accessed July 11, 2023)
- SCAQMD. 2023c. *SCAQMD Air Quality Significance Thresholds*. <https://www.aqmd.gov/docs/default-source/ceqa/handbook/south-coast-aqmd-air-quality-significance-thresholds.pdf?sfvrsn=25> (Accessed July 11, 2023).

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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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 thereof 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, possess, or destroy their nest or eggs.

ENVIRONMENTAL SETTING (BASELINE):

The proposed project site is surrounded by urban and industrial 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 and industrial 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. 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 an urban, industrialized 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:

Remedial actions 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 an urban, industrialized 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 industrial 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 remedial actions would not 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:

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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Disturb any human remains, including those interred outside of dedicated cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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 since 1962 for a metal finishing business at its current location. 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, Embee Processing, 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 development. 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 since 1962 for a metal finishing business at its current location. 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, Embee Processing, 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 project 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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 Pacific Gas & Electric Company (PG&E), 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. PG&E 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 due to wasteful, inefficient, or unnecessary consumption, 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:

The remedial action would use heat to volatilize volatile organic compounds (VOCs) in soil (in situ) which would then be captured in the gas phase using vapor extraction. Heating would be achieved through physical heating (conduction) of the soil using steam or direct heating (heater wells would apply a heat source directly to the soil and groundwater) or through electrical resistance heating (ERH) using an electrical, alternating current is passed through soil and the soils resistance generates heat along the path that the current travels.

The existing power supplies present at the site would not support the additional electrical demand of the in situ thermal remediation (ISTR) system. Therefore, the ISTR contractor would be required to work with Southern California Edison (SCE) to provide a project specific power drop that can be used by the facility. Utility power would be delivered to a central control system and used for remedial actions. Approximately 95% of the energy would be adjusted to the proper voltage and delivered to electrodes for soil and groundwater heating. The other 5% would be used for auxiliary loads and would include the vapor recovery and steam condensation equipment.

Even though operation of the ISTR would incrementally increase electricity use at the project site, the electricity would be used for a beneficial use (cleanup of contaminated soils). In addition, operation of the ISTR would occur for approximately 3 to 6 months and would not result in any long-term operations. For these reasons, implementation

of the remedial actions would not result in the wasteful, inefficient, or unnecessary use of electricity or petroleum fuels. Implementation of the proposed project would not result in adding any new facilities that would increase the long-term demand for energy resources.

Conclusion:

Even though the proposed project would add new facilities (e.g., ISTR) that would increase the demand for energy resources (i.e., electricity) at the project site, implementation of the proposed remedial action would not result in a wasteful, inefficient, or unnecessary consumption of energy resources. Consumption of additional energy resources would be for the purpose of a beneficial use. 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.ca.gov/faces/billNavClient.xhtml?bill_id=201520160SB350 (Accessed May 3, 2022).

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.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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 project 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. The local geology and hydrogeology consist of dense clay soils that extend to approximately 40 feet below ground surface (bgs) with interbedded sand. More permeable sand zones are observed deeper. On the project site the lithology is classified into two zones, the upper clay dominated unit with interbedded discontinuous sand layers identified as the A-Zone and the deeper contiguous sandy zone identified as the C-Zone. The A-Zone generally extends from 10 to 43 feet bgs, while the C-Zone extends from 40 to 70 feet bgs. The A-Zone (shallow) primarily consists of silts and clays

with sandy interbeds that increase in frequency toward the base of the zone. The sandy interbeds appear to be laterally discontinuous. The C-Zone (deep) generally has thicker and more laterally continuous sandy beds.

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 remedial actions (34 months) and, therefore, the potential for exposure to substantial risk of injury to people would be limited

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 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 34 months; therefore, the potential for substantial risk or injury to people from seismic ground shaking would be limited.

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 remedial actions would occur for a short duration (34 months) that would reduce the potential exposure of people or structures to significant impacts from strong seismic ground shaking.

- 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 (34 months), therefore the potential for substantial risk or injury to people would be limited and 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 remedial actions would not substantially increase the amount of potential soil erosion by preventing storm water runoff contact and water intrusion into the soil. The proposed wells would not substantially affect the coverage of impermeable surfaces on the project site. Therefore, substantial soil erosion or the loss of topsoil would not occur with implementation of the proposed remedial actions.

Conclusion:

Remedial actions associated with the proposed project would not increase the potential for soil erosion or loss of topsoil on the proposed project site. Impacts related to soil erosion and loss of topsoil would not occur.

- 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 (process by which saturated, unconsolidated soil or sand is converted into a suspension during an earthquake). The vibrations associated with the proposed work, such as operation of auger drills, 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. Therefore, the remedial actions would not create a substantial direct or indirect risk to life or property.

Conclusion:

Proposed remedial actions would not result in any new structures or facilities being placed on expansive soils. Therefore, substantial risk to life or property from expansive soils would not occur.

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 since 1962 for a metal finishing business at its current location. 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. 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 May 2, 2022).

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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

The South Coast Air Quality Management District (SCAQMD) 2023 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 (CO₂). 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, 2023). 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, 2023).

ENVIRONMENTAL STUDIES PERFORMED AND METHODOLOGY:

California Emissions Estimator Model® (CalEEMod, Version 2022.1.1.14) was run to identify project-related greenhouse gas emissions. 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; 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 134 metric tons of CO_{2e} per year during the construction period (refer to 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, CO₂e signifies the amount of CO₂ 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 CO₂e 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 CO₂e per year. This amount of CO₂e falls below the SCAQMD Air Quality Significance Thresholds operation-related maximum annual threshold of significance for industrial facilities of 10,000 metric tons of CO₂e 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 CO₂e emissions from implementing the remedial actions (134 metric tons of CO₂e 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 CO₂e 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 Air Quality Significance Thresholds (March 2023) identify an operation-related maximum annual threshold of significance for industrial facility projects of 10,000 metric tons of CO₂e per year. However, construction-related CO₂e 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 134 metric tons of CO₂e per year. This amount of CO₂e falls below the SCAQMD Air Quality Significance Thresholds operation-related maximum annual threshold of significance for industrial facilities of 10,000 metric tons of CO₂e 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 July 11, 2023).

SCAQMD. 2023c. *SCAQMD Air Quality Significance Thresholds*. <https://www.aqmd.gov/docs/default-source/ceqa/handbook/south-coast-aqmd-air-quality-significance-thresholds.pdf?sfvrsn=25> (Accessed July 11, 2023).

Ecometrica 2012. Greenhouse Gases, CO₂, CO₂e, 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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):

The proposed project site has been used continuously since 1962 for a metal finishing business at its current location and currently is used for ongoing industrial uses. The metal plating and finishing business involved the use of chromium, tin, nickel, and copper. Tetrachloroethylene (PCE), trichloroethylene (TCE), and 1,1,1-trichloroethane (TCA) were historically used as vapor degreasing agents in the grinding and metal finishing operation. These vapor degreasers led to soil and groundwater impacts on the western side of the property where VOCs are present in low permeability shallow zone clay soils and interbedded clays, silts, and sands in the deeper zone.

VOCs, chromium (including hexavalent chromium), and perchlorate are the primary contaminants of concern (COCs) at the site and the focus of ongoing interim measures. Figure 2 shows the areas of concern where COCs have been historically stored, used in processes, or observed in soil and/or groundwater along with the maximum extent of the treatment areas.

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 *In Situ Thermal Remediation Work Plan 2136 South Hathaway Street, Santa Ana, California* (Stantec, 2022).

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 an anticipated 3- to 6-month period during use and transport of hazardous materials, and management and/or transport of waste generated would occur.

The proposed project would implement remedial actions to address impacted soil and groundwater including the use of in situ thermal remediation (ISTR), known as electrical resistance heating (ERH), which passes an electrical current through the soil and groundwater that requires treatment. The key activities that would be completed for the installation of the ISTR treatment system would include installing electrodes, recovery wells, sensor wells, and monitoring points; constructing a vapor extraction system; installing field piping, electrical, and controls systems; and installing vapor and groundwater treatment systems.

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. 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 HASP and standard practices, implementation of remedial actions would not 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 slight 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 HASP including requirements for workers and other construction management components;
- 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; and
- 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) 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:

Century High School, Madison Elementary School, and Edison Elementary School are located within one mile of the proposed project site. However, the proposed remedial actions would not involve activities that would disturb the existing contaminated soils in such a way that could impact offsite areas, including the school.

Conclusion:

Implementation of remedial actions at the proposed project site would occur within one mile of two elementary schools and a 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 schools.

- 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 included on the list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. However, the purpose of the remedial actions is to cleanup contaminated soils on the site. Therefore, proposed activities would not create a significant hazard to the public or the environment.

Conclusion:

The proposed project site is included on the list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. The proposed remedial actions would remove, not create, a significant hazard to the public or the environment. 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 located within the boundaries of the John Wayne Airport Land Use Plan. John Wayne Airport (JWA) which is located approximately 2.5 miles to the south of the project site in the City of Santa Ana. Specifically, the project site is located inside the Notification Area for JWA but is located outside all Safety Zones (e.g., traffic pattern zone). Therefore, the remedial actions associated with the proposed project would not create a safety hazard for the JWA.

Conclusion:

The proposed remedial actions would occur in an area located within the John Wayne Airport Land Use Plan. However, implementation of the project would not result in a safety hazard related to the operations at the JWA.

- 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. The HASP would include 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 operation 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 best management practices (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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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:			<input checked="" type="checkbox"/>	
(i) result in substantial erosion or siltation on- or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(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	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(iv) impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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 project site is located in the Coastal Plain of Los Angeles Groundwater Basin (California Regional Water Quality Control Board, 2014). There are no surface water bodies within a one-mile radius of the proposed project and the Proposed project site does not include wetlands.

Groundwater is encountered at the proposed project site at depths ranging from approximately 20 to 60 feet below ground surface (bgs). The regional groundwater system consists of several aquifers, which are hydrologically connected in some areas (Forebay Area) and typically connected only in limited quantities through leaky aquitards in other areas (Pressure Area). The depth, thickness, and presence/absence of these aquifers are dependent upon location within the synclinal basin. Specifically, depth to the regional aquifers is typically greatest toward the synclinal axis and the aquifer formations are also typically thickest in these locations.

The Forebay Area is described as the area where deep infiltration of rainwater occurs. Deep infiltration occurs in these areas primarily because the horizontal confining beds (i.e., clay) of the Lakewood and Recent formations are thin or absent and the synclinal sediments of the San Pedro Formation are dipping near the ground surface. These areas are typically along the north and northeastern limbs of the syncline (near the cities of Anaheim and Fullerton). Wells installed at multiple depths in the Forebay Area generally have similar hydraulic head measurements due to the absence of confining conditions. In areas of groundwater extraction, downward movement of groundwater may occur along the dip of the aquifers.

The Pressure Area, within which the project site is located, is described as the area where deep infiltration of rainwater or vertical movement of groundwater is limited because of thick flat lying fine grained sediments. The Pressure Area is generally along the axis of the San Pedro Formation syncline where bedding is nearly horizontal. The San Pedro Formation is overlain by the nearly flat lying sediments of the Lakewood and Recent formations. The relatively thick sections of silt and clay in the Recent, Lakewood, and upper portions of the San Pedro Formations form leaky aquitards (and potentially-complete aquicludes) that preclude the vertical movement of groundwater.

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 implementing in situ thermal remediation (ISTR) which would use physical heating (conduction) of the soil using steam or direct heating (using heater wells that apply a heat source directly to the soil and groundwater) or use electrical resistance heating (ERH), where an electrical, alternating current is passed through soil and the soils resistance generates heat along the path that the current travels. The extracted steam would then be condensed above grade, would be cooled to ambient conditions, and would be treated. Remedial actions would be intended to improve groundwater quality and would not violate any water quality standards or water discharge requirements.

Conclusion:

The proposed remedial actions are anticipated to improve groundwater quality and result in the overall reduction of contaminant mass in the groundwater system. 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.

Wells and electrodes would be installed using solid and/or hollow-stem flight augers, sonic drilling methods (for angled borings), and hand auger for shallow electrodes in the process areas of each building. Wells drilled with solid flight augers would be installed by advancing the augers to total depth, removing the augers from the borehole, then constructing the well casing and annular backfill in the open boring. Wells drilled using hollow-stem augers or sonic would be installed by advancing the augers to total depth, constructing the well casing inside the auger, and simultaneously removing the augers from the borehole while backfilling the annulus.

Construction of the wells would not result in reducing groundwater discharge because the project site is currently covered with impervious surfaces and construction of wells would not change the overall amount of impervious surfaces on the project site. Therefore, 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 wells 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 wells would not substantially increase or decrease the paved surface area of the site. Runoff from the project site would not change and would continue to be managed in accordance with all applicable laws and regulations.

Conclusion:

Implementation of the remedial actions would not result in any substantial changes to onsite drainage patterns. Therefore, 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 wells would not substantially increase or decrease the paved surface area of the site. The existing, operating storm water controls at the proposed project site would continue to prevent flooding due to paved surfaces at the site.

Conclusion:

The proposed remedial actions would not alter the overall, existing drainage patterns on the proposed project site and, therefore, 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 the wells would not substantially increase or decrease the paved surface area of the site. The existing, operating storm water controls at the proposed project site would continue to prevent polluted runoff.

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 (Flood Factor, 2022). 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 2022). 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 implementing in situ thermal remediation (ISTR) to contaminated soils and groundwater at the project site. Operation of the ISTR would decrease the potential for contaminants to migrate from soil or 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:

DTSC 1324 (Revised 03/14/2019)

California Department of Conservation (CDC). 2022. Department of Conservation Tsunami Inundation Map, <https://www.conservation.ca.gov/cgs/tsunami/maps>. (Accessed May 5, 2022).

Flood Factor. 2022. Flood risk overview for Orange County. https://floodfactor.com/county/orange-county-california/6059_fsid/ (Accessed May 5, 2022).

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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

City of Santa Ana Zoning Code provides restrictions and regulations on land uses and identifies the proposed project site and adjacent parcels as M1, Light Industrial. Similarly, the City of Santa Ana General Plan designates the land use of the proposed project site and adjacent parcels as IND, Industrial.

ENVIRONMENTAL SETTING (BASELINE):

The City of Santa Ana General Plan refers to the proposed project site as an area that provides space for light and heavy manufacturing, warehousing, processing, and distribution activities.

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., operation of an ISTR to remove VOCs in soil and groundwater). 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 Santa Ana. Zoning Information. 2022. https://storage.googleapis.com/proudcity/santaanaca/uploads/2022/03/Zoning_FULL_CITY.pdf (Accessed May 17, 2022).
- City of Santa Ana. 2022. General Plan, Land Use Element. <https://www.santa-ana.org/general-plan-documents/> (Accessed May 17, 2022).

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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

No laws, ordinances, regulations, or standards protecting mineral resources are applicable to the proposed project.

ENVIRONMENTAL SETTING (BASELINE):

The proposed project site is located in an urban, developed area of the City of Santa Ana which has been identified as Urban Land by the California Department of Conservation and has been designated as industrial in the City of Santa Ana General 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

The Noise Element of the City of Santa Ana General Plan identifies its purpose to appraise noise levels in the community, prepare noise contours to guide land use decisions, and establish measures that address current and future noise impacts. This element works to ensure that the City limits the exposure of the community to excessive noise levels in noise-sensitive areas and at noise-sensitive times of day. The City adopted noise levels that exceed 65 dB community noise equivalent level (CNEL) to be unacceptable for various land use categories. CNEL is a measure that weights the average noise levels for the evening hours (7:00 p.m. to 10:00 p.m.), increasing them by 5 dB, and weights the late evening and morning hour noise levels (10:00 p.m. to 7:00 a.m.) by 10 dB. The daytime noise levels are combined with these weighted levels and are averaged to obtain a CNEL value.

The City of Santa Ana Municipal Code (Article VI, Noise Control) addresses impacts that are due to construction noise. The noise ordinance states that noise sources associated with construction, repair, remodeling, or grading of any real property, provided said activities do not take place between the hours of 8:00 p.m. and 7:00 a.m. on weekdays, including Saturday, or any time on Sunday or a federal holiday (Section 18.314(e)).

ENVIRONMENTAL SETTING (BASELINE):

The proposed project site is located in an urban, developed area of the City of Santa Ana and currently zoned for industrial development as part of the City’s General Plan. Existing ambient noise in the area of the proposed project site includes industrial activities and vehicle trips along nearby roads (e.g., South Grand Avenue, East Saint Gertrude Place, East Warner Avenue, South Standard 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 L_{eq} , 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 drilling of wells and trenching for the larger ISTR system. Remedial actions would occur over 34 months during daytime hours which meet the City of Santa Ana'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 18.314(e)).

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 L_{eq} for the purposes of measuring noise generated during construction activities and is considered relevant and appropriate. L_{eq} 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 approximately ¼-mile to the nearest noise sensitive receptors (i.e., residences aligning South Standard Avenue). Using the RCNM, noise levels generated by the loudest construction equipment anticipated to be used for remedial actions (i.e., auger, loader, excavator) at the proposed project site are predicted to be 46.7 L_{eq} dBA at 1,100 feet (closest distance between the proposed project site and nearest residence) (FHWA 2006). 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 be allowed in accordance with City regulations.

Conclusion:

The proposed project would meet City of Santa Ana's requirement that construction activities shall be concentrated during the hours of the day. In addition, noise levels generated during construction activities would not be discernible from the existing ambient noise levels in the proposed project site area because of the distance (1,100 feet) to the nearest noise receptor (e.g., residence). 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., auger, loader, excavator) at the proposed project site. Ground-borne vibration and noise generated by the use

of these heavy construction equipment would not be felt at the nearest receptor (i.e., residence) because of the distance to construction activities (1,100 feet). Therefore, 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 John Wayne Airport which is located approximately 2.5 miles to the south of the project site in the City of Santa Ana.

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 Santa Ana Municipal Code. https://library.municode.com/ca/santa_ana/codes/code_of_ordinances?nodeId=PTIITHCO_CH18HESA_ARTVINOCO_S18-312EXNOST (Accessed May 17, 2022).

Federal Highway Administration (FHWA). February 15, 2006. Roadway Construction Noise Model. https://www.fhwa.dot.gov/environment/noise/construction_noise/rcnm/ (Accessed May 17, 2022).

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)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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 Santa Ana Zoning Code provides restrictions and regulations on land uses and identifies the proposed project site as a Industrial. The City of Santa Ana General Plan designates the land use of the proposed project site and adjacent area as Industrial.

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 contaminated soils and groundwater. Remediation of contaminated soils and groundwater would not change the underlying use of the site for industrial uses and would not allow for increased population growth.

Conclusion:

The proposed project would not have the potential to allow for future population growth. 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 contaminated soils and groundwater at the proposed project site. Remediation of contaminated soils and groundwater 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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 Santa Ana Zoning Code provides restrictions and regulations on land uses and identifies the proposed project site for industrial uses. The City of Santa Ana General Plan designates the land use of the proposed project site and the adjacent areas as industrial.

Public parks located within 1 mile of the proposed project site includes Delhi Park (located 1/2 mile to the southwest). Century High School is located 3/4 mile to the north of the site. Santa Ana Police Department is located 3 miles to the northwest of the site. Orange County Fire Department Station 79 is located 1/4-mile to the south and Kindred Hospital of Santa Ana is located 4 miles to the northwest of the site. Lastly, the Orange County Library is located 1/2-mile to the north 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 Orange County Fire Department Station #79, located at 1320 East Warner Avenue in Santa Ana. The drive distance between the proposed project site and Station #79 is also ¼-mile. 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 Santa Ana'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 is Century High School which is located ¾-mile to the north. 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 is Delhi Park (located ½ mile to the southwest). 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 Kindred Hospital of Santa Ana, located approximately 4 miles to the northwest at 1901 College Avenue in Santa Ana. Construction activities could result in a slight increase in demands for services at the hospital. 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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 include Delhi Park (located ½-mile to the southwest). Delhi Park is located in the City of Santa Ana and is a 10.40-acre neighborhood park that offers a soccer mini pitch court, fitness court, basketball court, a multipurpose field, ball diamond, and playground for tots/youth.

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 Delhi Park, located ½-mile southwest 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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 Transportation Authority (OCTA) is the agency responsible for planning and operating regional transit facilities and services in Orange County. The OCTA 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):

East Saint Gertrude Place, South Grand Avenue, and South Standard Avenue provide the main access routes into the proposed project site. None of the nearby roadways or Highways (Highway 55 is located approximately 1 mile to the east) are included in the OCTA 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 anticipated 3- to 6-month construction period due to delivery of materials and supplies

to the site, removal of any 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 East Saint Gertrude Place, South Grand Avenue, or South Standard Avenue. It is anticipated that heavy truck trips would be only associated with moving equipment associated with the ISTR system to the site. The trucks would primarily enter and exit the proposed project site on South Hathaway Street which connects to East Saint Gertrude Place. As these trips would be intermittent, the remedial actions would not substantially increase the traffic on any public street system. 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. Overall, the proposed project is considered a less-than-significant impact in relation to congestion management.

There are no bike lanes in the vicinity of the project site. The nearest bus line (OCTA Route #55) operates along East Saint Gertrude Place near 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.

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:

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	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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 50 years for industrial purposes.

DTSC complied with the 2014 Assembly Bill 52 (AB52). DTSC provided written notification to ten tribes on the Tribal Consultation List from the NAHC regarding the proposed project on September 19, 2023. 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 50 years for industrial uses. 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, remediation activities would be immediately suspended in the immediate area and surrounding 25 feet along with contacting and informing the DTSC Project Manager (Angela Turner at (714) 484-5477; angela.turner@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 remediation 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 50 years for industrial uses.

On September 19, 2023, the DTSC formally notified the ten tribes identified in the NAHC listing. By October 31, 2023, 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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):

Water delivered to customers in the proposed project area originates from groundwater pumps (62 percent of its water supply and purchases the remainder (38 percent) from the Metropolitan Water District of Southern California. The City of Santa Ana, along with the Orange County Sanitation District, provide wastewater service to the residents of the City. Republic Services provides refuse and recycling service in the City of Santa Ana.

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 and operation of the ISTR system would not affect the current drainage pattern of the site. Runoff on the site would continue to be collected in the existing drainage system.

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 34 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 3- to 6-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:

The proposed remediation activities would not generate substantially increase the amounts of solid waste needing transport offsite.

Conclusion:

Any minimal solid waste generated by remedial actions would be served by the existing solid waste service provider. 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 would not generate substantially increase the amounts of solid waste needing transport offsite.

Conclusion:

Any minimal solid waste generated by remedial actions 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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 11 miles south 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.

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.

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.

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 May 18, 2022).

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