Initial Study/Negative Declaration

Remediation Action Plan (RAP) for the Former Mouren-Laurens Oil Company and Leach Oil Company Sites Project

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ACRONYM LIST

Acronym	Definition
AAM	Annual Arithmetic Mean
AB	Assembly Bill
ADT	Average Daily Trips
AQMP	Air Quality Management Plan
BMP	Best Management Practice
CAAQS	California Ambient Air Quality Standards
CalEEMod	California Emissions Estimator Model
CAL FIRE	California Department of Forestry and Fire Prevention
CALGreen Code	California Green Building Standards Code
Caltrans	California Department of Transportation
CARB	California Air Resources Board
CBC	California Building Code
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CNEL	Community Noise Equivalent Level
CO	carbon monoxide
CO_2	carbon dioxide
Cortese List	Hazardous Waste and Substances Site List
cy	cubic yards
dB	decibel
dBA	A-weighted decibel scale
DPM	diesel particulate matter
DTSC	Department of Toxic Substances Control
EIR	Environmental Impact Report
EMFAC	EMissions FACtor
EO	Executive Order
ESA	Environmental Site Assessment
FEMA	Federal Emergency Management Agency
FMMP	Farmland Mapping and Monitoring Program
ft	feet
FTA	Federal Transportation Administration
GHG	greenhouse gas
HCP	Habitat Conservation Plan
HVAC	heating, ventilation, and air conditioning
I	Interstate
in/sec	inches per second
IP-GZ	Industrial Preservation-Green Zone
IS	Initial Study
kBTU	One thousand British Thermal Units
km	kilometer
LACM	Natural History Museum of Los Angeles County

Acronym	**Definition**
LDN	day-night average sound level
L_{eq}	energy average
L_{eq} dBA	Equivalent Continuous Noise Level in A-weighted decibels
L_{max}	maximum noise level
L_{min}	minimum noise level
LOC	Leach Oil Company, Inc.
LST	localized significance threshold
MBTA	Migratory Bird Treaty Act
MG	Million Gallons
MGD	million gallons of wastewater per day
mg/m^3	milligrams per cubic meter
MLOC	Mouren-Laurens Oil Company
ND	Negative Declaration
mph	miles per hour
MPO	metropolitan planning organization
MRZs	Mineral Resources Zones
MRZ-1	Mineral Resource Zone-1 (an area with no significant mineral deposits)
MRZ-2	Mineral Resource Zone-2 (an area with significant mineral deposits)
MRZ-3	Mineral Resource Zone-3 (an area containing known mineral resources of undetermined significance)
msl	mean sea level
$MTCO_2e$	metric tons of carbon dioxide equivalent
$MTCO_2e/yr$	metric tons of carbon dioxide equivalent per year
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NCCP	Natural Community Conservation Plan
NPDES	National Pollutant Discharge Elimination System
NO	nitric oxide
NO_2	nitrogen dioxide
NOx	nitrogen oxide
O_3	ozone
OEHHA	Office of Environmental Health Hazard Assessment
OPR	Office of Planning and Research
PM2.5	fine particulate matter with a diameter of 2.5 microns or less
PM10	respirable particulate matter with a diameter of 10 microns or less
ppm	parts per million
ppv	peak particle velocity
RCP	Regional Comprehensive Plan
rms	root mean square
RR	Regulatory Requirements
RTP/SCS	Regional Transportation Plan/Sustainable Communities Strategy
RWQCB	Los Angeles Regional Water Quality Control Board
SB	Senate Bill

Acronym	**Definition**
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCCIC	South-Central Coastal Information Center
SCE	Southern California Edison
SCGC	Southern California Gas Company
SFRWQCB	San Francisco Bay Regional Water Quality Control Board
SIP	State Implementation Plan
SLF	Sacred Lands File
SO_2	sulfur dioxide
SoCAB	South Coast Air Basin
SR	State Route
SWRCB	State Water Resources Control Board
TACs	toxic air contaminants
T-Bact	best available control technology for toxics
TCP	Traffic Control Plan
$\mu g/m^3$	micrograms per cubic meter
Qyf	young alluvial deposit
USEPA	U.S. Environmental Protection Agency
USFWS	U.S. Fish and Wildlife Service
UWMP	Urban Water Management Plan
VHFHSZ	Very High Fire Hazard Severity Zone
VMT	vehicle miles traveled
VOC	volatile organic compound

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1.0 INTRODUCTION

1.1 PURPOSE OF THE INITIAL STUDY

The purposes of this Initial Study (IS) are to (1) describe the proposed Remediation Action Plan (RAP) for the Former Mouren-Laurens Oil Company and Leach Oil Company Sites Project (hereinafter referred to as the Project), located in unincorporated Los Angeles County (County), near the City of Compton (City) and (2) provide an evaluation of potential environmental impacts associated with implementation of the RAP. As no potentially significant impacts are identified, no mitigation measures are required. The Project is the approval and implementation of the RAP for the Former Mouren-Laurens Oil Company and Leach Oil Company Sites, at 641, 705, 717, and 719 East Compton Boulevard; 625 East Compton Boulevard; and 15006 South Avalon Boulevard in Compton, California. This IS was prepared pursuant to the California Environmental Quality Act (CEQA), as amended (Section 21000 et. seq. of the *Public Resources Code*) and in accordance with the State CEQA Guidelines (Title 14, Section 15000 et. seq. of the *California Code of Regulations*).

Pursuant to Section 15367 of the State CEQA Guidelines, the Los Angeles Regional Water Quality Control Board (hereinafter referred to as the RWQCB) is the lead agency for the Project. The lead agency is the public agency that has the principal responsibility for carrying out or approving a project that may have a significant effect on the environment. The RWQCB, as the lead agency, has the authority for Project approval and certification of the accompanying environmental documentation. In addition to addressing the potential environmental impacts that would result from the proposed Project, this IS/ Negative Declaration (ND) serves as the primary environmental document for future activities associated with the Project.

The RWQCB, as the lead agency, has reviewed and revised, as necessary, all submitted drafts and technical studies and has commissioned the preparation of this IS/ND to reflect its independent judgment. This IS/ND evaluates the potential environmental impacts of Project implementation; and includes impact determinations from the environmental analyses. The findings include either less than significant or no impact conclusions. Therefore, no mitigation measures are proposed .

1.2 CALIFORNIA ENVIRONMENTAL QUALITY ACT COMPLIANCE

In accordance with CEQA and the State CEQA Guidelines, an IS has been prepared for the proposed Project and its potential environmental impacts. The IS indicates that the Project would have no impacts or less than significant impacts, with no mitigation required, and therefore, the Project requires the preparation of an IS/ND.

This IS/ND serves as the environmental document that presents the analysis of Project impacts on each of the environmental topics in the CEQA Environmental Checklist provided in Section 4.0. This document will serve to inform the RWQCB decision makers, representatives of affected trustee and responsible agencies, and other interested parties of the potential environmental effects that may occur with approval and implementation of the proposed Project.

1.3 PROJECT SUMMARY

1.3.1 LOCATION

The former Mouren-Laurens Oil Company, Inc. site (MLOC Site) and Leach Oil Company, Inc. site (LOC Site) (collectively, Site or Sites) are situated next to each other in an unincorporated portion of Los Angeles County near the City of Compton, California.

MLOC Site

The MLOC Site consists of four parcels at 641, 705, 717, and 719 East Compton Boulevard. The parcel numbers assigned by the Los Angeles County Assessor Office are 6137-004-030, 6137-004-031, 6137-004-032, and 6137-004-033. The combined total area of the parcels is 3.76 acres.

LOC Site

The LOC Site consists of three parcels at 625 East Compton Boulevard and 15006 South Avalon Boulevard. The parcel numbers assigned by the Los Angeles County Assessor's Office are 6137-004-028, 6137-004-029, and 6137-004-006. The combined total area of the parcels is 1.24 acres.

Refer to Exhibit 1, Regional Location and Local Vicinity and Exhibit 2, Existing Project Site.

1.3.2 PROJECT PROPONENT

Mouren-Laurens Oil Company, Inc.
Contact: Timothy Cronin, Esq.
750 Menlo Avenue, Suite 320
Menlo Park, CA 94025
(415) 254-3876

1.3.3 EXISTING GENERAL PLAN AND ZONING

General Plan Land Use Designation: Light Industrial (IL)

Zoning Classification: Light Manufacturing (M-1)- Industrial Preservation-Green Zone (IP-GZ)

1.3.4 EXISTING SETTING

Project Site

The existing setting is described below. Exhibits 3a and 3b, Site Photos, depict the existing conditions of the MLOC and LOC Sites.

Regional Location and Local Vicinity

Exhibit 1

RAP for the Former Mouren-Laurens and Leach Oil Sites Project

N W E S

0 1,000 2,000 Feet

PSOMAS

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Legend

- Approximate Property Line
- FireHydrant
- Conduit_Trench
- Conduit
- Gas_lines
- Electric_line
- Water_Lines
- Fence
- Buildings
- Former/ Existing Aboveground Storage Tanks

Notes

1. All locations are approximate.

Sources

1. Basemap courtesy of Esri, photo from April 2020.

Source: EKI Environment & Water, May 2021

Existing Project Site

Exhibit 2

RAP for the Former Mouren-Laurens and Leach Oil Sites Project

N W E S

Map not to scale

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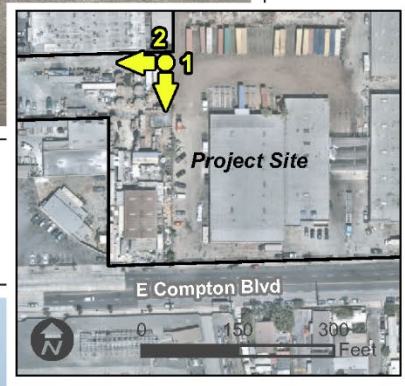

Photo 1. Looking south towards the Mouren-Laurens Oil Company Inc. Site and Compton Blvd.

Photo 2. Looking west towards the Leach Oil Company Inc. Site and Avalon Blvd.

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Site Photographs

Exhibit 3a

RAP for the Former Mouren-Laurens and Leach Oil Sites Project

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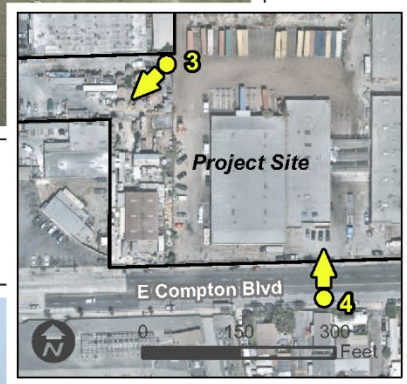

Photo 3. Looking southwest towards the Leach Oil Company Inc. Site.

Photo 4. Looking north towards the Mouren-Laurens Oil Company Inc. Site.

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Site Photographs

Exhibit 3b

RAP for the Former Mouren-Laurens and Leach Oil Sites Project

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MLOC Site

Four buildings exist at the MLOC Site as shown on Exhibit 2, Existing Project Site. The Site is currently used for warehousing operations. The MLOC Site is currently owned by Rev 973, LLC.

LOC Site

There is only one building at the LOC Site. The 4000 square feet metal building is a warehouse with two small offices. The remainder of the Site is unoccupied and contains remnants of structures used in historical waste oil refining operations. The LOC Site is currently owned by Leach Property Management and Patricia Leach.

Surrounding Land Uses

The Project site is located within a highly urbanized area and is immediately surrounded by light industrial/manufacturing uses on the west and north sides. Further to the east is St. Albert the Great Middle School and to the south across E. Compton Boulevard are St. Albert the Great School and Catholic Church. Single family residential development is to the south across E. Compton Boulevard and to the east across S. Stanford Avenue. The Warwick Terrace Apartments are to the northeast (north of St. Albert the Great Middle School), and Roy Campanella Park is to the east of the Warwick Terrace Apartments, across from S. Stanford Avenue. A general store is located adjacent on the southwest side of LOC Site.

1.4 SUMMARY OF FINDINGS

Based on the environmental checklist form prepared for the Project and supporting environmental analysis (Section 4.0), the proposed Project would have no impact or less than significant impacts in all topics.

According to CEQA, it is appropriate to prepare an IS/ND for the proposed Project because there are no significant environmental impacts or the environmental impacts are less than significant.

1.5 INTENDED USES OF THIS DOCUMENT

This IS/ND has been prepared to determine the appropriate level of environmental documentation required for the proposed Project pursuant to CEQA. This document will also serve as a basis for soliciting comments and input from members of the interested parties, general public, and public agencies regarding the proposed Project. The Draft IS/ND will be circulated for 30 days, during which comments concerning the analysis should be sent to:

Regional Water Quality Control Board
Attention: Adnan Siddiqui
320 4th Street, Suite 200
Los Angeles, CA 90013
adnan.siddiqui@waterboards.ca.gov

1.6 ORGANIZATION OF THE INITIAL STUDY

The IS/ND is organized into sections, as described below.

- **Section 1.0: Introduction.** This section provides an introduction, Project summary, and overview of the conclusions in the IS/ND.
- **Section 2.0: Project Location and Environmental Setting.** This section provides a brief description of the Project location, relevant background, operational history, hydrogeology, environmental investigations and nature of contamination, and a description of the existing conditions of the Project site and vicinity.
- **Section 3.0: Project Description.** This section provides a description of the proposed Project, a statement of purpose and need, and necessary discretionary approvals.
- **Section 4.0: Environmental Checklist.** The completed Environmental Checklist Form based on Appendix G of the State CEQA Guidelines provides an overview of the potential environmental impacts that may or may not result from Project implementation. The Environmental Checklist Form also includes "mandatory findings of significance", as required by CEQA.
- **Section 5.0**: **List of Preparers.** This section identifies the list of preparers for the IS/ND.
- **Section 6.0: References.** This section identifies the references used to prepare the IS/ND.

2.0 PROJECT LOCATION AND ENVIRONMENTAL SETTING

2.1 PROJECT BACKGROUND

The former MLOC Site and LOC Site are situated next to each other in an unincorporated portion of Los Angeles County near the City of Compton, California. The Sites have a similar operational history with some overlap in ownership. Operations at both Sites resulted in the discharge of petroleum hydrocarbons, volatile organic compounds (VOCs), semi-VOCs, and other waste to the ground and the waters of the State, creating contamination. Both Sites pose a threat to human health and the environment because of the concentrations of various chemicals in soil, soil vapor, and groundwater.

The RWQCB has overseen site assessment and cleanup at the MLOC Site since 1987. Prior to transfer of regulatory oversight of the LOC Site from the California Department of Toxic Substances Control (DTSC) to the RWQCB in 2009 due to the similar operational history of the Sites and comingling of contaminant plumes, LOC operated a hazardous waste treatment, storage, and disposal facility (TSDF) under a DTSC Standardized Permit Grant of Interim Status starting in October 1993. The interim status granted to the TSDF was terminated by statute on January 1, 1998. In 2008, DTSC made a final decision to deny a Standardized Hazardous Waste Facility Permit to LOC for the TSDF. Due to this designation, the LOC Site must meet the closure performance standards in California Code of Regulations, Title 22, Division 4.5, Chapter 15.

In 1998, Rev 973, LLC (Rev) became the sole owner of the MLOC Site. Immediately after that, Rev initiated litigation in Los Angeles Superior Court against former owners and/or operators of the MLOC Site and LOC Site related to contamination at the MLOC Site. A Special Master was appointed, and environmental investigations were performed at the Sites by an independent consultant who implemented the work proposed by the litigating parties' consultants. In 2014, the RWQCB issued Cleanup and Abatement Order Nos. R4-2014-0117 and R4-2014-0118 (CAOs or Orders) to clean up and abate the effects of waste discharged at the Sites.

In 2020, RAP was submitted to the RWQCB on behalf of Rev 973, LLC by Partner Engineering. The RWQCB found the RAP inadequate and deficient in addressing the cleanup of COCs at the Sites.

In July 2021, an updated RAP (Appendix A to this IS/ND) was prepared to address the RWQCB's concerns (EKI 2021). The updated RAP was prepared by EKI Environment & Water, Inc. (EKI) and submitted on behalf of MLOC Parties. The updated RAP proposed a conceptual approach to address the contamination present in soil, soil vapor, and groundwater at and under the Sites. The RWQCB concurred with the approach provided in the updated RAP. In addition, the RWQCB prepared a Fact Sheet and distributed the Fact Sheet to interested parties and to the owners and occupants of properties located within a 500-foot radius of the Sites to solicit comments on the updated RAP. In April 2022, the RWQCB issued a detailed response (Appendix B of this IS/ND) to the updated RAP, with its approval subject to compliance with conditions including preparation of CEQA document.

2.2 PROJECT LOCATION

Both the MLOC and LOC Sites are located within the Metro Planning Area, which is one of 11 long-range planning areas established by the General Plan for how the unincorporated communities will grow in the future. Within the Metro Planning Area, the Project Sites are located within the West Rancho Dominguez-Victoria Community, as shown on Exhibit 1, Regional Location, Local Vicinity.

The MLOC Site consists of four parcels at 641, 705, 717, and 719 East Compton Boulevard, for a total area of 3.76 acres. The LOC Site consists of three parcels at 625 East Compton Boulevard and 15006 South Avalon Boulevard, for a total area of 1.24 acres.

2.3 SITE ACCESS

Local vehicular access to the MLOC Site is currently provided by one driveway located along East Compton Boulevard to the south and access to the LOC Site is provided by one driveway located along Avalon Boulevard to the west. Within a regional context, the Project site is located approximately 2 miles east of Interstate (I) 110, and approximately 3 miles north of California State Route (SR)-91.

2.4 SURROUNDING LAND USES AND DEVELOPMENT

The Project site is located within a highly urbanized portion of unincorporated Los Angeles County, which primarily includes a mix of industrial/commercial and residential uses. The Project site is bound by industrial uses to the north; industrial uses and St. Albert the Great Middle School to the east; East Compton Boulevard and residential uses to the south; and Avalon Boulevard and industrial uses to the west.

2.5 EXISTING PHYSICAL CONDITIONS

2.5.1 HYDROGEOLOGY AND SUBSURFACE CONDITIONS

The MLOC and LOC Sites are situated within Central Basin of the Los Angeles County Coastal Plain in the proximity of the Avalon-Compton Fault. Alluvial material consisting of clay, silt, sand, and gravel underlie both Sites. The Site is underlain by Bellflower Aquiclude followed by Gardena Aquifer. The Exposition Aquifer is absent. The maximum depth of investigation at the MLOC Site is 139 feet below ground surface (bgs). Based on the boring logs, there are two groundwater zones identified within the Bellflower Aquiclude: a thin perched groundwater zone located at approximately 60 feet bgs and the basal groundwater zone at 80 feet bgs. The perched groundwater zone has been dry since 2019. Gardena/Gage Aquifer occurs below the Basal Aquifer separated by an aquitard. There are several groundwater monitoring wells screened within the perched and basal groundwater zones, and the groundwater flow is towards the south-southeast. Review of available lithologic data indicates that the stratigraphy beneath the MLOC and LOC Sites consists generally of the following:

- 0 to 15 feet ft bgs Clayey silt/silty clay unit with minor thin sand interbeds
- 15 to 40 ft bgs Fine sand unit with minor thin silt interbeds
- 40 to 45 ft bgs Silt unit with minor sand interbeds
- 45 to 60 ft bgs Fine sand unit with moderate thin silt and clay interbeds
- 60 to 73 ft bgs Silt unit with clay and sand interbeds
- 73 to 110 ft bgs Fine sand unit (Basal Aquifer).
- 110-130 ft bgs Silt and Clay
- 130-139 ft bgs (maximum explored depth) Gardena-Gage Aquifer

2.6 PLANNING CONTEXT

2.6.1 GENERAL PLAN AND ZONING DESIGNATIONS

Both the MLOC and LOC Sites have a General Plan land use designation of Light Industrial (IL) (Los Angeles County 2014), which allows for light industrial uses, including light manufacturing, assembly, warehouse and distribution (Los Angeles County 2024a).

Both the MLOC and LOC Sites are zoned Light Manufacturing (M-1)-Industrial Preservation-Green Zone (IP-GZ) (DRP 2024). The Light Manufacturing Zone (M-1) allows for light industry, repair, wholesale, and packaging, including manufacturing, assembly, distribution, and storage of goods that have low nuisance impacts but excluding raw-materials production, processing or bulk handling. Zone M-1 will also accommodate retail and service commercial uses to serve local employees and visitors (Los Angeles County 2024b).

2.7 HISTORIC SITE USES

2.7.1 MLOC SITE

The MLOC Site was the location of an active oil production well until 1955. MLOC began operations at the site between 1956 and 1958. Various individuals owned the MLOC Site until 1965, when Joseph Mouren-Laurens and his wife, Emma Mouren-Laurens became the owners of the Site. In 1979, John Mouren-Laurens, along with John's wife Mireille Mouren-Laurens, became owners of the property and operated at the MLOC Site. In 1998, the property was acquired by Rev 973, LLC.

MLOC was engaged in blending and packaging of both new and recycled/refined/reclaimed motor oils, transmission oils, and antifreeze for retail. Tanker trucks from oil refineries delivered both new and recycled/refined/reclaimed motor oil to the above ground storage tanks. From these ASTs, oil was piped into a plant where it was blended and packaged for retail. In addition, one underground pipeline transferred recycled/refined/reclaimed oil from the adjacent LOC Site to the ASTs located in the northern portion of the Site. Aboveground storage tanks were concentrated in a tank farm situated along the northern boundary of the MLOC Site and next to and inside the buildings as depicted on Exhibit 2,

Existing Project Site. The site operations also included various phases of receiving, processing, and packaging of chemicals. For over 50 years, the Site was used for oil storage, blending and repackaging of recycled/refined/reclaimed oil, petroleum products, cleaning agents, and commercially available chemicals. Based on the available information, the usage, storage, and transfer of chemicals and/or hazardous materials at the Site, at a minimum, include crude oil, processed oil (motor oil, transmission oil), solvents, antifreeze, resins, urethane and household cleaning agents. A general summary of historical activities in each building, is as follows:

Building No. 1 – The building was constructed between 1956 and 1958. MLOC conducted blending and repackaging operations in the warehouse portion of this building. During this period, portions of the building were leased for office space. The second underground pipeline (Pipeline No. 2), approximately 130 ft long, consists of four underground pipes, each 4 inches in diameter, that extend from the former northern aboveground storage tank farm to Building 1 where used oil and other materials were processed and packaged (EKI 2021).

Building No. 2 – The building was constructed in 1965. At one time a portion was leased to SanWare Company, which operated a spray booth. Other tenants used the building for repackaging of cleaners, fiberglass boat manufacturing and urethane processes and packaging.

Building No. 3 – Various tenants occupied and conducted operations in the building. Urethane Systems blended urethane chemicals, blending of hair and beauty products. Hazardous waste manifests indicate shipping of non-RCRA hazardous waste liquid from this building.

Building No. 4 – In the 1990s, John Mouren-Laurens started a new business called Premier Chemicals. It purchased bulk glass cleaners, pine cleaner, carpet cleaner, fabric softener, laundry detergent, shampoo, odor eliminator cleaner, and dishwashing liquid for repackaging and retail sale.

2.7.2 LOC SITE

Telovis Oil Company, an oil recycling business, operated on the LOC Site beginning in the 1940s. In May 1960, Joseph Mouren-Laurens acquired Telovis. In 1966, George Leach acquired Telovis and renamed it the Leach Oil Company, Inc. (LOC).

The LOC Site has been used for various phases of receiving, processing waste oil into usable oil products, and packaging of waste oil. The oil reclamation process included one or more boiler units and a reclamation pond and involved application of concentrated acids. The operations conducted at the LOC Site included various methods to store and process hazardous waste, which included storage tanks, skim ponds, and pipelines.

The first underground pipeline, approximately 170 ft long and 6 inches in diameter, extends from an aboveground point on the LOC Site just west of the LOC Site/MLOC Site property line to an underground manifold box near the northern aboveground storage tank farm on the MLOC Site (Pipeline No. 1). Leach Oil Company LOC used this underground pipeline to

transport used oil from the LOC Site to the MLOC Site. Sometime in 1960s, George Leach of the Leach Oil Company LOC ceased using this underground pipeline and removed the aboveground portion on the LOC Site while leaving in place the underground pipeline on the MLOC Site (EKI 2021).

In subsequent years after the underground pipeline was abandoned and the aboveground portion on the LOC Site was removed, re-refined lubricating oil was shipped from the LOC Site in tanker trucks or was blended, canned and resold in cases and drums. Re-refining operations were phased out beginning in the late 1970s or early 1980s. In the mid-1980s, an attempt was made using a thermal process to convert the oil to fuel-grade oil, but it was discontinued within a year because it was not profitable. Patricia Leach has owned and operated the Site at least since 1985.

The LOC Site contained a number of aboveground storage tanks, underground storage tanks, underground product pipeline(s), and a skim pond. A hazardous waste storage area, aboveground storage tanks that held oil feedstocks, and process equipment consisting of heaters, oil-water separators, and clay mixing tanks, occupy the central part of the LOC Site. The northwestern portion of the LOC Site was a truck loading area and is presently utilized for vehicle parking (EKI 2021). LOC used various processes to recycle used oil at the LOC Site. Used oil was re-refined or otherwise recovered by an acid-clay process, a thermal process, and by gravity separation. Written records of Site operations, and chemicals used and stored at the LOC Site are not available; however, there are reports of violations and unauthorized discharge of waste as well as poor housekeeping and record keeping. In 1989, a former employee of the Leach Oil Company reported to the Los Angeles County Fire Department that LOC had intentionally discharged waste onto the MLOC property.

LOC operated a hazardous waste TSDF under a Standardized Permit Grant of Interim Status starting October 1, 1993. In 1995, the California Attorney General's Office filed a lawsuit against Leach Oil Company for violating California Hazardous Waste Control laws. LOC's Standardized Permit Grant of Interim Status was terminated by law on January 1, 1998. In 2008, DTSC denied a Standardized Hazardous Waste Facility Permit for LOC because of "Leach Oil's long history of repeated and recurring violations of the State hazardous waste laws and regulations." LOC has not been authorized to operate TSDF since January 1998.

2.8 NATURE AND EXTENT OF CHEMICAL IMPACTS

COCs are chemicals that are determined to possibly pose a threat to human health and the environment at a given site. Petroleum hydrocarbons; petroleum hydrocarbon related constituents, such as benzene and ethylbenzene; chlorinated solvents; 1,4-dioxane; N-nitrosodimethylamine (NDMA); and metals, such as lead, are the primary COCs within the Site media. On-site, the VOCs have migrated to soils and volatilized and leached to groundwater south of the MLOC and LOC Sites. Releases from other upgradient properties are also contributing COCs detected in groundwater downgradient and upgradient of the Sites. This contamination is expressed by samples taken at existing aquifer groundwater monitoring wells within the surrounding area.

2.9 EVIDENCE OF CHEMICAL RELEASES

2.9.1 MLOC SITE

Contaminants in soil and groundwater are distributed across the MLOC Site where petroleum products were kept in aboveground storage tanks and drums outside buildings. Oil was released from these aboveground storage tanks and drums in addition to underground pipelines that conveyed oil from the LOC Site and between the various aboveground storage tanks and Building 1 where oil blending and packaging operations were performed.

Chemical releases have occurred at the MLOC Site since at least the 1960s. In 1987, oil-saturated soil and oil residue was discovered at the property and in the gutter and catch basin along East Compton Boulevard. In response, the RWQCB issued Cleanup and Abatement Order No. 87-147 that required John P. Mouren-Laurens and MLOC to clean up the oily deposits and chemical spill residuals, to abate effects thereof, and to "assess the site and characterize the extent of soil and groundwater contamination from past disposal practices." MLOC restricted its business due to inspections, violations, and other spills and releases that happened in 1989 and 1992 through 1995 (EKI 2021).

Data collected from environmental investigations conducted at the Site indicate that wastes discharged at the Site due to the industrial operations consist of solvents, petroleum hydrocarbons, volatile organic compounds (VOCs), semi-volatile organic compounds (semiVOCs), polychlorinated biphenyls (PCBs), metals, pesticides and emergent chemicals such as 1,4-Dioxane.

2.9.2 LOC SITE

Numerous chemical releases have taken place at the LOC Site. In 1951, 4,000 to 5,000 gallons of oil leaked from an underground storage tank at the property. An underground structure at the LOC Site referred to as the "Skim Pond" (more aptly described as a sump), collected used oil and acidic wastewater during re-refining operations, which likely resulted in soil and groundwater contamination on the MLOC Site. Available soil and groundwater data indicate releases of VOCs and/or petroleum hydrocarbons also occurred at process equipment and aboveground storage tank locations on the LOC Site (EKI 2021).

The data collected from environmental investigations conducted at the Site indicate that waste discharges occurred during industrial operations at the Site. The following chemicals have been detected in soil, soil vapor, and/or groundwater:

- Petroleum hydrocarbons, acetone, toluene, total xylenes, benzene, ethylbenzene, isopropyl alcohol, 2-butanone (MEK), tetrachloroethylene (PCE), trichloroethylene (TCE), 1,1-dichloroethene (1,1-DCE), 1,1,1-trichloroethane (TCA), vinyl chloride, semi-volatile organic compounds (semiVOCs), polychlorinated biphenyls (PCBs), metals, pesticides, and emergent chemicals such as 1,4-Dioxane

Groundwater monitoring results confirm that VOCs and 1,4-dioxane have migrated offsite downgradient towards south of the MLOC and LOC Sites. Groundwater investigations also indicate that releases from other upgradient sources are contributing VOCs, in particular TCE detected in groundwater at the Sites.

2.10 REMEDIAL INVESTIGATIONS

Multiple investigations were performed at the Sites by various consultants to characterize the nature and extent of contamination. Beginning in 1987 until 2002, at least ten site characterization investigations were performed at MLOC site by various consultants. After the Court appointed an independent consultant, multiple investigations were performed at both Sites, first by Waterstone Environmental, Inc., beginning in 2005-2006 and later by MK Environmental Consulting Inc. (MK).

Since 1987, the site characterization work included installation and sampling of soil borings, multi-depth soil vapor probes, cone penetrometer (CPT) borings, and groundwater wells. The latest soil and soil vapor sampling was performed at the MLOC site in November 2020. There have been 29 permanent groundwater monitoring wells installed. Six groundwater monitoring wells were installed offsite and 23 onsite locations. Eighteen wells are screened within the Basal Aquifer, ten wells within the Perched Aquifer, and one well is screened within Gardena Aquifer. The latest groundwater monitoring occurred in December 2020. The Perched Aquifer wells have gone dry since 2019.

The results of the investigations reflect that the soil, soil vapor, and groundwater beneath the Sites are impacted from historical operations conducted at the Sites. Data gaps remain, particularly in soil vapor plume delineation at LOC site.

2.11 PREVIOUS REMOVAL ACTIONS

Removal actions are measures required to prevent, minimize, or mitigate contamination that might otherwise result from the release or threatened release of a hazardous substance. Removal actions include stabilization or elimination of hazardous substances in drums, barrels, tanks, or other bulk storage containers that may pose a threat of release. Such measures were performed at the MLOC and LOC Sites.

2.11.1 MLOC SITE

All oil-soaked dirt was scraped and removed from the MLOC Site per the requirements of Cleanup and Abatement Order No. 87-147. In addition, Rev decontaminated, demolished, and removed aboveground storage tanks and associated piping from the MLOC Site. However, two underground pipelines remain at the MLOC Site.

2.11.2 LOC SITE

Aboveground storage tanks at the LOC Site were originally installed on gravel layers placed over soil. In 1990, LOC removed approximately 400 cubic ft of oil-containing gravel and soil beneath the tanks to a depth of roughly 4 ft bgs. In 2010, removal of liquid and sludge from the Skim Pond occurred.

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3.0 PROJECT DESCRIPTION

3.1 PROPOSED PROJECT SUMMARY

The Project is the approval and implementation of the 2021 updated RAP in accordance with the RWQCB direction in the detailed response dated April 22, 2022. The updated RAP addresses the contamination of the MLOC and LOC Sites through a series of actions. The implementation of the updated RAP requires development of various studies and workplans and their implementation under RWQCB oversight after receiving RWQCB approval. The proposed remedial approach will require at least: (1) demolition activities, (2) baseline risk assessment and development of cleanup goals, (3) additional assessment to fill data gaps, (4) on-site structures removal, (5) targeted soil excavation, (6) pilot testing and bench-scale testing, (7) SVE system operation, (8) sparging system operation, (9) in-situ chemical oxidation, (10) monitoring specific to each remedial technology to evaluate efficacy of the remedy (11) monitored natural attenuation, and (12) execution of a deed restriction and environmental covenant. Workplans will be required to collect additional information prior to activating the full-scale remedy.

3.2 REMEDIAL ACTION OBJECTIVES

Section 13304 of the California Water Code authorizes the RWQCB to order and oversee the cleanup and abatement of waste that is discharged or threatened to be discharged into waters of the State. RAP defines remedial action objectives (RAOs) as being designed to remove, treat in-situ, isolate, and reduce concentrations of COCs present in soil, soil vapor, and groundwater to protect human health, groundwater resources, and the environment. RAOs also should facilitate the evaluation of remedial alternatives that will meet numerical cleanup goals based on the reasonably anticipated land use of the site in question.

The RWQCB requires that the cleanup at both Sites be conducted under the authority of the Porter-Cologne Water Quality Control Act, pursuant to the requirements stated in the CAOs issued for the Sites. Additionally, because the LOC Site was a TSDF, it must also meet the closure performance standards pursuant to California Code of Regulations, Title 22, Division 4.5, Chapter 15.

3.3 CLEANUP GOALS

The soil, soil vapor, and the groundwater at the Sites are impacted with COCs and required remediation as proposed in the updated RAP. Therefore, cleanup goals must be developed for the COCs to protect public health, water resources, and the environment. Cleanup goals for soil and groundwater in compliance with the State Water Resources Control Board (SWRCB) Resolution No. 92-49: *Policies and Procedures for Investigation and Cleanup and Abatement of Discharges Under Water Code Section 13304.95* should protect human health, groundwater and surface water resources, environment, and beneficial uses set forth in the RWQCB's Water Quality Control Plan for the Los Angeles Region (Basin Plan). The groundwater cleanup goals for the site could be based on background levels and/or

maximum contamination levels (MCLs). State MCLS are developed pursuant to California Code of Regulations (22 CCR) by the Division of Drinking Water.

Tier 1 screening levels such as the U.S. EPA-established RSLs and the SFRWQCB established ESLs are numerical thresholds for chemicals if present in soil, soil vapor, or groundwater at a site at those concentrations, the Site may be considered safe. The Tier 1 level is used to screen if a COC-containing site pose a significant threat to human health, groundwater resources, and the environment. A site-specific risk assessment may be necessary to evaluate the potential threat to individuals based on the site use. The risk assessment and modeling with using site-specific data may be used to develop site-specific cleanup goals for the remedies implemented at the MLOC and LOC Sites. The risk assessment and Cleanup Goals will be submitted to the RWQCB.

3.4 REMEDIAL ACTION IMPLEMENTATION APPROACH

The updated RAP provides a reasonable approach to address contamination at the Sites. It is emphasized that the specifics of each task in the updated RAP are dependent upon the additional information collected during data gap investigations and results of pilot testing and bench-scale testing. The conceptual approach proposed in the updated RAP is sequential, consisting of several steps that may overlap during implementation. Remedial actions will be implemented consistent with the Orders and the RWQCB April 22, 2024 letter as described in further detail below.

3.4.1 PRE-REMEDIATION DEMOLITION

Existing aboveground storage tanks and process equipment remaining on the LOC Site will be demolished to prepare the property for remediation. Underground sumps, trenches, and pipelines associated with former operations at the MLOC and LOC Sites also will be removed. Debris generated from these activities will be segregated into recyclable and non-recyclable materials and transported to and disposed of at appropriate off-Site, permitted facilities.

An underground pipeline removal and assessment workplan will be submitted to the RWQCB. The workplan will address potential for encountering free product inside or in soil below the pipelines.

3.4.2 DATA GAP INVESTIGATION AND IMPACTED SOIL EXCAVATION

There are data gaps remaining in the delineation of COCs distribution at the Sites. Limited soil vapor data from the early 2000s exist from LOC site. In addition, soil borings are needed to determine the extent of excavation, particularly around skim pond located at LOC site. Therefore, a data gap investigation work plan will be submitted to the RWQCB. Subsequently a soil excavation workplan will be developed and submitted to RWQCB.

3.4.3 VOC REMOVAL

Soil Vapor Extraction (SVE) is recognized as a proven technology. This technology applies a vacuum to create a negative pressure that causes movement of vapors toward extraction wells. The vapors are collected from the subsurface then treated to remove COCs. The SVE wells will be installed within the vadose zone and will be nested with two screen intervals between 5 feet bgs to 65 feet bgs. It is estimated that 15-30 SVE wells will be required but the final number will be based on the result of pilot testing. Air sparging is an in-situ remedial technology that involves injecting air into groundwater, which transfers volatile constituents dissolved in the groundwater into vapor. The vapors are then vented through the unsaturated zone where they are collected by SVE wells for aboveground treatment. The air sparging wells will be screened into the Basal Aquifer, likely at 100 to 105 feet bgs. It is expected that 5-10 air sparging wells will be install at the Site. A pilot study will be conducted to determine the radius of influence, establish COC removal rates, and operating parameters for design and construction of full-scale SVE/air sparging systems at the MLOC and LOC Sites. The purpose of SVE and air sparging is to remove VOCs and sufficient contaminant mass so that biodegradation is no longer impeded by oxygen depletion in the subsurface. Refer to Exhibit 4, Proposed Soil Excavation Areas and Exhibit 5, Vapor Extraction/Air Sparging Well Locations and Depths.

An SVE/air sparging pilot test work plan for the Sites will be developed and submitted to the RWQCB. Based on the pilot test results, a full-scale SVE system and air sparging system design will be developed and submitted to the RWQCB.

3.4.4 IN-SITU CHEMICAL OXIDATION (ISCO)

ISCO is a technique that uses chemicals to clean up soil and groundwater contaminated with hazardous chemicals. ISCO is a type of advanced oxidation process that involves injecting chemicals called oxidants underground through temporary injection points. The oxidants will primarily be injected into Basal Aquifer, which is located 73-110 feet bgs. Additional injections may be done in highly impacted areas within the vadose or within perched water zone between the depths of 50-65 feet bgs. The total number of injection points at the Site is expected to be between 10-20 locations. Once the oxidant is pumped down the wells, it spreads into the surrounding soil and groundwater where it mixes and reacts with contaminants. Common oxidants include hydrogen peroxide, potassium permanganate, sodium persulfate, ozone, and permanganate. 1,4-dioxane may not be amenable to volatilization via sparging. Bench-scale testing will be performed to select the suitable oxidant for ISCO.

3.4.5 PERFORMANCE EVALUATIONS

SWRCB Resolution No. 92-49 requires a discharger to address the effects of its waste discharge in a manner that promotes attainment of either background water quality (i.e., water quality that existed before the discharge) or the best water quality that is reasonable if background water quality cannot be restored.

Legend

- Soil Boring Location (AEI, 2001)
- Soil Boring Location (Ralph Stone, 1989)
- Soil Boring Location (Clayton, 2000)
- Soil Boring Location (MRM, 1996)
- Cone Penetrometer Test Boring and Groundwater Boring Location (Waterstone, 2011)
- Hydropunch Ground Water Location (Waterstone, 2006)
- Abandoned Piazometer Location (Clayton, 2000 abandoned by Waterstone, 2009)
- Soil Boring and Soil Gas Sampling Location (MKECI, 2020)
- Soil Gas Survey Probe Location (Waterstone, 2006 and Waterstone, 2011)
- Shallow Soil Boring Location (40' to 55' bgs) (Waterstone, 2006 and Waterstone, 2011)
- Deep Soil Boring Location (90' bgs) (Watersone, 2006)
- Perched Zone Monitoring Well
- Water Table Aquifer Monitoring Well Location - On-Site or Downgradient (Waterstone, 2006, 2009, & 2011; AE, 2001)
- Water Table Aquifer Monitoring Well - Upgradient (MKECI, Oct 2020)
- Gardena Aquifer Monitoring Well (Waterstone, 2009)
- FireHydrant
- Conduit_Trench
- Buildings
- Former/ Existing Aboveground Storage Tanks
- Conduit
- Gas Line
- Electric Line
- Water Line
- Fence
- Approximate Property Line
- Likely Soil Excavation Areas

Abbreviations

SVE = soil vapor extraction

Sources

1. Basemap courtesy of Esri, photo from April 2020.
2. Adapted from Mouren Laurens Remediation Figure 2, Waterstone Environmental, Inc. 01/2011.

Source: EKI Environment & Water, May 2021

Proposed Soil Excavation Areas

Exhibit 4

RAP for the Former Mouren-Laurens and Leach Oil Sites Project

N W E S

Map not to scale

PSOMAS

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Legend

- Soil Boring Location (AEI, 2001)
- Soil Boring Location (Ralph Stone, 1989)
- Soil Boring Location (Clayton, 2000)
- Soil Boring Location (MRM, 1996)
- Cone Penetrometer Test Boring and Groundwater Boring Location (Waterstone, 2011)
- Hydropunch Ground Water Location (Waterstone, 2006)
- Abandoned Piazometer Location (Clayton, 2000 abandoned by Waterstone, 2009)
- Soil Boring and Soil Gas Sampling Location (MKECI, 2020)
- Soil Gas Survey Probe Location (Waterstone, 2006 and Waterstone, 2011)
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- Deep Soil Boring Location (90' bgs) (Watersone, 2006)
- Perched Zone Monitoring Well
- Water Table Aquifer Monitoring Well Location - On-Site or Downgradient (Waterstone, 2006, 2009, & 2011; AE, 2001)
- Water Table Aquifer Monitoring Well - Upgradient (MKECI, Oct 2020)
- Gardena Aquifer Monitoring Well (Waterstone, 2009)
- FireHydrant
- Conduit_Trench
- Buildings
- Former/ Existing Aboveground Storage Tanks
- Conduit
- Gas Line
- Electric Line
- Water Line
- Fence
- Approximate Property Line
- Likely Soil Excavation Areas
- Proposed 15-feet Deep SVE Well (Assumed 25-feet Radius of Influence)
- Proposed 40-feet Deep SVE Well (Assumed 50-feet Radius of Influence)
- Proposed 65-feet Deep SVE Well (Assumed 30-feet Radius of Influence)
- Proposed 95-feet Deep Air Sparge (Assumed 30-feet Zone of Influence)

Abbreviations
SVE = soil vapor extraction

Sources
1. Basemap courtesy of Esri, photo from April 2020.
2. Adapted from Mouren Laurens Remediation Figure 2, Waterstone Environmental, Inc. 01/2011.

Source: EKI Environment & Water, May 2021

Proposed Soil Vapor Extraction/Air Sparging Well Locations and Depths

Exhibit 5

RAP for the Former Mouren-Laurens and Leach Oil Sites Project

N W E S

Map not to scale

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During the implementation of each remedy at the Sites, data will be collected at regular intervals from predetermined monitoring locations on a schedule included in the remedy-specific implementation plan. Groundwater data compiled from existing monitoring wells will also be used to compare the actual performance of remedial technologies to expected performance.

3.4.6 MONITORED NATURAL ATTENUATION

Monitored natural attenuation (MNA) will follow active remediation by SVE, air sparging, and ISCO. MNA refers to the reliance on natural processes to finish site cleanup. Natural processes (e.g., biodegradation, dispersion, dilution, sorption, and volatilization), under favorable conditions, act without human intervention to reduce the mass, toxicity, mobility, volume, and/or concentration of contaminants in soil or groundwater.

RWQCB considers MNA acceptable in certain circumstances and under specific conditions. For example, MNA might be appropriate where a source area is being actively remediated, and MNA is proposed primarily at the fringes of the plume.

3.4.7 CONSTRUCTION

Certain construction activities are anticipated during implementation of the RAP. Construction activities would occur in phases, including demolition of the remaining ASTs and process equipment; excavation and demolition associated with the underground sumps, trenches and pipelines; excavation associated with the removal of contaminated soil; SVE and air sparging well construction; and surface restoration, occurring after excavation and after the full scale remedial system has been installed.

Construction activities would require drilling to install SVE and air sparging wells, as well as installing multi-depth soil vapor probes. Pilot tests will be conducted prior to installation of full scale SVE and air sparging systems. The actual number of SVE, air sparging, and soil vapor probes will be determined based on the results of the pilot tests. Drilling activities would be five days per week, Monday through Friday between 8 AM till 5 PM.

3.4.8 SOIL IMPORT/EXPORT

Implementation of the Project is expected to remove approximately 150 to 250 cubic yards (cy) of soil associated with the excavation/demolition of the underground sump, trenches, and pipelines, and the removal of approximately 60 to 100 cy of contaminated soil from this excavation, for source removal. In some areas with high concentrations of COCs adsorbed to soil such as the skim pond area, additional impacted soil will be removed. The extent of the limits of the excavation will be determined from data gap investigation; however, it is expected that total soil removal will not be exceed 5,000 cy.

Haul trucks with a capacity of 17 cy per load would be utilized to transport the contaminated soil. Inert (non-contaminated) soil would be exported to Azuza Land Reclamation Landfill (owned and operated by Waste Management) in Azuza; Chiquita Canyon Landfill (owned and operated by Waste Connections) located in Santa Clarita; and/or Simi Valley Landfill

(owned and operated by Waste Management) located in Simi Valley. Contaminated soil would be directed towards Soil Safe in Adelanto (owned and operated by Soil Safe), or the US Ecology Facility (owned by the State of Nevada and operated by US Ecology) located in Beatty, Nevada. The soil generated at the site will be sampled for waste classification and then disposed offsite to an appropriate TSDF facility under waste manifest.

3.4.9 IMPLEMENTATION TIMEFRAME

The Implementation of the updated RAP is expected to begin within 90 days after RAP approval. Based on the multiple tasks to be carried out from demolition, excavation, active remediation, monitoring, it is expected that it will take approximately 14 years for RAP to be implemented and the Sites to become eligible for no further action determination from the RWQCB.

4.0 ENVIRONMENTAL CHECKLIST

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 on the following pages.

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

DETERMINATION: (To be completed by the Lead Agency.)

On the basis of this initial evaluation:

☒ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☐ I find that although the proposed Project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the Project have been made by or agreed to be the Project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Russ Colby Digitally signed by Russ Colby Date: 2025.02.19 12:24:23 -08'00' Water Boards

Signature	02/19/2025 Date
Russ Colby Printed Name	Los Angeles Regional Water Quality Control Board For

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 Analysis," 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.

4.1 AESTHETICS

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

Impact Analysis

Would the Project:

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

Less than Significant Impact. Scenic vistas are generally defined as natural landscapes that form views of unique flora, geological, or other natural features that are generally free from urban intrusions. Typical scenic vistas include views of mountains, hills, uninterrupted open spaces and waterbodies. The County does not recognize specific views or corridors that are identified for conservation purposes; however, it recognizes the importance of the varied topography including the foothills, mountains, the Los Angeles Basin, and the coastline (Los Angeles County 2014a). The Project is located within an urbanized setting in the County immediately surrounded by light industrial/manufacturing uses on all sides, and no scenic vistas are located or visible within the vicinity of the Project.

The Project is approval and implementation of the 2021 updated RAP to address the contamination of the MLOC and LOC Sites through a series of remedial actions. Short-term activities such as pre-remediation demolition, excavation at Skim Pond on the LOC Site and the two underground pipelines on the MLOC Site, and installation of a concrete or asphalt cover system would not significantly impact the existing visual setting at the Project site, as the proposed activities may not be uncommon within a similar area with light industrial/manufacturing uses. The Project site will include concrete and asphalt pavement to serve as a cover system, which prevents contact with soil containing metals and other non-VOCs. In the long term, the appearance of the Project site will remain similar to the current visual setting, as the cover system would not significantly alter site conditions.

As such, the short- and long-term conditions of the Project site would not have an adverse impact on a scenic vista or block long-distance views of the surrounding views, as none exists

in the area or the surroundings that can be impacted. Therefore, impacts related to scenic vistas would be less than significant, and no mitigation is required.

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

No Impact. Based on the California Department of Transportation (Caltrans) California State Scenic Highway System Map, there are no designated State scenic highways within the Project vicinity (Caltrans 2024). The closest eligible scenic highway is Route 1 (starting in Long Beach), which is located approximately 35 miles south of the Project site and not visible from the site. The Project site has been disturbed and developed and does not contain areas with native vegetation. There are no scenic resources, including significant trees, rock outcroppings, and historic buildings in the vicinity of the Project site. Therefore, the proposed Project would not have an adverse effect on scenic resources (including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway) or a locally designated or scenic corridor. There would be no impact, and no mitigation is required.

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?

Less than Significant Impact. The Project is in an urbanized area and not located near any scenic resources or scenic highways. The visual character of the immediate area surrounding the Project site is representative of a built-out urban environment containing light industrial/manufacturing uses. The implementation of the RAP will include temporary activities such as the partial removal of existing on-site materials, grading, waste removal, and installation of a concrete or asphalt cover system, which will involve use of heavy equipment, stockpiling of materials, vehicle staging and parking areas, and exposing underlying soils. Upon completion, the remediated site will remain similar to the current visual setting.

The Project site is in an urban area and will remain consistent with the on-site zoning and General Plan Land Use designation and does not propose any changes that would conflict with the applicable regulations governing scenic quality. As such impacts would be less than significant, and no mitigation is required.

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

No Impact. The Project site is in an area that is already subject to significant ambient lighting from the existing light industrial/manufacturing uses surrounding the site. Existing light sources include exterior building lights, parking lot pole lights, and interior building lights. During RAP implementation activities, heavy equipment, haul trucks, and employee vehicles associated with the Project will utilize typical headlights and safety lighting after dusk which,

while visible, would not stand out in the surrounding urban setting. The lighting would not be more intense than the surrounding uses, and no lighting that is considered of high intensity such as high wattage security lighting is proposed. Additionally, it is anticipated that the proposed activities would primarily occur during the daytime hours.

Further, the remediation activities would not involve use of materials that would create glare restricting visibility, causing hazards to motorists on the surrounding streets and nuisance for pedestrians and other viewers. Therefore, the Project would not substantially alter existing light experienced on the site or in the vicinity or cause glare during the remediation or post-remediation. Therefore, impacts related to light and glare would be less than significant, and no mitigation is required.

Mitigation Measures

Project implementation would not result in significant impacts related to Aesthetics; therefore, no mitigation measures are required.

4.2 AGRICULTURE AND FOREST RESOURCES

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220[g]), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104[g])?	☐	☐	☐	☒
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

Impact Analysis

Would the Project:

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

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

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

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

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

No Impact. The Project site is in an urbanized light industrial area surrounded by the same and does not include agricultural uses. Based on review of the California Important Farmland Finder Map, prepared by the California Department of Conservation (DOC), Farmland

Mapping and Monitoring Program (FMMP), there are no lands designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance on or near the Project site (DOC 2024). The Project site is classified as "Urban and Built-Up Land" which is land occupied by structures with a building density of at least 1 unit to 1.4 acres, or approximately 6 structures to a 10-acre parcel. The Project site is not being used, nor anticipated to be used or zoned for agricultural purposes. The Project site is not subject to a Williamson Act contract, and the site does not contain Prime Farmland or Farmland of Statewide Importance.

Additionally, no forest land or timberland, as defined in the California Public Resources Code (Sections 12220[g] and 4526, respectively), occur on the Project site or in the surrounding area. Therefore, the proposed Project would not result in the conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural uses or forest land to non-forest use. Accordingly, no impacts to agricultural resources, forest land, or timberland would result from Project implementation, and no mitigation is required.

Mitigation Measures

Project implementation would not result in significant impacts related to Agriculture and Forest Resources; therefore, no mitigation measures are required.

4.3 AIR QUALITY

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☐	☒	☐
c) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
d) Result in other emissions (such as those leading to odors adversely affecting a substantial number of people?	☐	☐	☒	☐

Introduction

Existing Setting

An analysis of potential air quality impacts associated with the proposed Project was prepared and is summarized below.

Elements of the proposed Project that may have potential air quality impacts include (1) Project "Construction" (including demolition of remaining ASTs and process equipment; Excavation/Demolition of underground sumps, trenches, and pipelines; excavation of contaminated soil, SVE Well Installation; and Re-Paving) and (2) Project "Operations" consisting of operation of the SVEs and air sparging systems and infrequent maintenance at the Project site.

The Project site is located in the Los Angeles County portion of the South Coast Air Basin (SoCAB), and, for air quality regulation and permitting, is under the jurisdiction of the SCAQMD. The SoCAB is a 6,600-square-mile area bound by the Pacific Ocean to the west; the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east; and the San Diego County line to the south. The SoCAB includes all of Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino counties, in addition to the San Gorgonio Pass area of Riverside County. SoCAB's terrain and geographical location (i.e., a coastal plain with connecting broad valleys and low hills) determine its distinctive semi-arid climate, which is characterized by moderate temperatures, oceanic influence, and precipitation that is limited to a few storms during the winter (i.e., November through April).

Air Quality Background Information

SCAQMD has established quantitative thresholds for short-term (construction) emissions and long-term (operational) emissions for the following criteria pollutants: ozone, carbon monoxide, nitrogen oxides, sulfur dioxide, and particulate matter 10 and 2.5 microns. The characteristics and health effects of these criteria pollutants are described below:

- Ozone (O_3) is a nearly colorless gas that is formed by photochemical reaction (when nitrogen dioxide is broken down by sunlight). Ground-level O_3 exposure can cause a variety of health problems, including lung irritation, wheezing, coughing, pain when taking a deep breath, and breathing difficulties during exercise or outdoor activities; permanent lung damage; aggravated asthma; and increased susceptibility to respiratory illnesses.
- Carbon monoxide (CO) is a colorless and odorless toxic gas which, in the urban environment, is associated primarily with the incomplete combustion of fossil fuels in motor vehicles. CO combines with hemoglobin in the bloodstream and reduces the amount of oxygen that can be circulated through the body. High CO concentrations can lead to headaches, aggravation of cardiovascular disease, and impairment of central nervous system functions.
- Nitrogen oxides (NO_x) are yellowish-brown gases, which at high levels can cause breathing difficulties. NO_x are formed when nitric oxide (a pollutant from internal combustion processes) combines with oxygen.
- Sulfur dioxide (SO_2) is a colorless, pungent gas formed primarily by the combustion of sulfur-containing fossil fuels. Health effects include acute respiratory symptoms and difficulty in breathing for children.
- Particulate Matter 10 (PM10) and Particulate Matter 2.5 (PM2.5) refer to particulate matter less than ten microns and two and one-half microns in diameter, respectively. Particulates of these sizes cause a greater health risk than larger-sized particles since fine particles can more easily cause irritation. Particulate matter includes both aerosols and solid particles. An example of particulate matter is fugitive dust. Short-term exposure to high PM2.5 levels is associated with premature mortality and increased hospital admissions and emergency room visits. Long-term exposure to high PM2.5 levels is associated with premature mortality and development of chronic respiratory disease. Short-term exposure to high PM10 levels is associated with hospital admissions for cardiopulmonary diseases, increased respiratory symptoms, and possible premature mortality.

Toxic Air Contaminants

Carcinogenic risks (i.e., cancer risks) are estimated as the incremental probability that an individual will develop cancer as a direct result of exposure to potential carcinogens. The estimated risk is expressed as a probability (e.g., 10 in 1 million). A risk level of 1 in 1 million implies a likelihood that up to 1 person out of 1 million equally exposed people would contract cancer to the specific concentration over 30 years residential period. This would be in addition to those cancer cases that would normally occur in an unexposed population of

one million people (OEHHA 2015). The Hazard Index (HI) expresses the potential for chemicals to result in non-cancer-related health impacts. HIs are expressed using decimal notation (e.g., 0.001). A calculated HI exposure less than 1.0 will likely not result in adverse non-cancer-related health effects over a lifetime of exposure. However, an HI greater than 1.0 does not necessarily mean that adverse effects will occur (OEHHA 2015). Pursuant to SCAQMD Rule 1401(d)(1), the risks associated with potential exposure to emissions from a source equipped with the best available control technology for toxics (T-BACT) and from all emissions sources included within a "project" are acceptable if the incremental cancer risk (1) is less than 10 in 1 million and (2) is less than 1 in 1 million for sources not equipped with T-BACT.

The Multiple Air Toxics Exposure Study V (MATES V) is a monitoring and evaluation study conducted in the SoCAB. According to the MATES V Study, the carcinogenic risk from air toxics in the Basin has improved from the past. While toxic air pollutants decreased by more than 54 percent from 2012 to 2018, the cancer risk for residents of the SoCAB was 455 in one million in the year 2018 (SCAQMD 2021). The results of this Study indicate that diesel exhaust is the primary contributor to air toxics risk within the SoCAB.

Existing Air Quality Conditions

Air quality data for the Project site is represented by the Compton-700 North Bulls Road monitoring station (Ozone and NO2), the I-710 Near Road monitoring station (NO2, PM2.5), the Central LA monitoring station (CO), and Long Beach Signal Hill (PM10). The monitoring data presented in Table 2, Air Quality Levels Measured at nearby Monitoring Stations, were obtained from the California Air Resources Board (CARB 2023) and SCAQMD (SCAQMD 2024). Federal and State air quality standards are presented in Table 1 with the number of times those standards were exceeded in calendar years 2021, 2022, and 2023.

TABLE 1
AIR QUALITY LEVELS MEASURED AT NEARBY MONITORING STATIONS

Pollutant	California Standard	National Standard	Year	Max. Level[a]	State Standard Days Exceeded[b]	National Standard Days Exceeded[b, c]
O_3 (1 hour)	0.09 ppm	None	2021	0.085	0	0
			2022	0.111	1	0
			2023	.084	0	0
O_3 (8 hour)	0.070 ppm	0.070 ppm	2021	0.077	1	1
			2022	0.085	1	1
			2023	0.071	2	1
PM10 (24 hour)	50 µg/m³	150 µg/m³	2021	N/A	N/A	N/A
			2022	57.9	N/A	0
			2023	81.2	N/A	0
PM10 (AAM)	20 µg/m³	None	2021	N/A	–	–
			2022	25.1	–	–
			2023	22.0	–	–
NO_2 (1 hour)	0.18 ppm	0.100 ppm	2021	0.09	0	0
			2022	0.09	0	0
			2023	0.07	0	0
NO_2 (AAM)	0.030 ppm	0.053 ppm	2021	0.02	0	0
			2022	0.02	0	0
			2023	0.02	0	0
CO (1 hour)	20 ppm	35 ppm	2021	2	0	0
			2022	1.7	0	0
			2023	1.4	0	0
CO (8 hour)	9 ppm	9 ppm	2021	1.6	0	0
			2022	1.5	0	0
			2023	1.2	0	0
PM2.5 (24 Hour)	None	35 µg/m³	2021	84.6	-	7
			2022	39.0	–	1
			2023	58.3	–	1
PM2.5 (AAM)	12 µg/m³	9 µg/m³	2021	13.01	N/A	N/A
			2022	11.91	N/A	N/A
			2023	10.6	N/A	N/A

O_3: ozone; ppm: parts per million; PM10: respirable particulate matter with diameter of 10 microns or less; µg/m3: micrograms per cubic meter; AAM: Annual Arithmetic Mean; NO2: nitrogen dioxide; CO: carbon monoxide; PM2.5: fine particulate matter with a diameter of 2.5 microns or less.

NA: Not Available
Source: CARB 2023.

Regulatory Background

The U.S. Environmental Protection Agency (USEPA) defines seven criteria air pollutants: O_3, CO, NO_2, SO_2, PM10, PM2.5, and lead. These pollutants are called criteria pollutants because the USEPA has established National Ambient Air Quality Standards (NAAQS) for the concentrations of these pollutants (Shown in Table 3) (USEPA 2023). The California Air Resources Board (CARB) has also established standards for the criteria pollutants, known as California Ambient Air Quality Standards (CAAQS), and the State standards are generally more restrictive than the NAAQS. When a region has air quality that fails to meet the standards, USEPA and CARB designate the region as "nonattainment" and the regional air quality agency must develop plans to attain the standards.

Based on monitored air pollutant concentrations, USEPA and CARB designate an area's status in attaining the NAAQS and the CAAQS, respectively, for selected criteria pollutants. These attainment designations are shown in Table 2.

TABLE 2
ATTAINMENT STATUS OF CRITERIA POLLUTANTS
IN THE SOUTH COAST AIR BASIN

Pollutant	State	Federal
O_3 (1 hour)	Nonattainment	No Standards
O_3 (8 hour)	Nonattainment	Extreme Nonattainment
PM10	Nonattainment	Attainment/Maintenance
PM2.5	Nonattainment	Serious Nonattainment
CO	Attainment	Attainment/Maintenance
NO_2	Attainment	Attainment
SO_2	Attainment	Attainment
Lead	No Standard	Attainment/Nonattainment*
All others	Attainment/Unclassified	No Standards

O_3: ozone; PM10: particulate matter 10 microns or less in diameter; PM2.5: particulate matter 2.5 microns or less in diameter; CO: carbon monoxide; NO_2: nitrogen dioxide; SO_2: sulfur dioxide.

* The Los Angeles County portion of the SoCAB is designated nonattainment for lead; the remainder of the SoCAB is designated attainment.

Source: SCAQMD 2017; USEPA 2023.

CARB is responsible for coordinating and administering both the federal and State air pollution control programs in California. In this capacity, CARB conducts research, sets the CAAQS (as shown in Table 3), compiles emission inventories, develops suggested control measures, oversees local programs, and prepares the State Implementation Plan (SIP). For regions that do not attain the CAAQS, CARB requires the air districts to prepare plans for attaining the standards. These plans are then integrated into the SIP. CARB establishes emissions standards for (1) motor vehicles sold in California, (2) consumer products (e.g., hair spray, aerosol paints, barbecue lighter fluid), and (3) various types of commercial equipment. It also sets fuel specifications to further reduce vehicular emissions.

TABLE 3
CALIFORNIA AND NATIONAL AMBIENT AIR QUALITY STANDARDS

Pollutant	Averaging Time	California Standards	National Standards	
			Primary[a]	Secondary[b]
O_3	1 Hour	0.09 ppm (180 µg/m³)	—	—
	8 Hour	0.070 ppm (137 µg/m³)	0.070 ppm (137 µg/m³)	Same as Primary
PM10	24 Hour	50 µg/m³	150 µg/m³	Same as Primary
	AAM	20 µg/m³	–	Same as Primary
PM2.5	24 Hour	–	35 µg/m³	Same as Primary
	AAM	12 µg/m³	9.0 µg/m³	15.0 µg/m³
CO	1 Hour	20 ppm (23 mg/m³)	35 ppm (40 mg/m³)	—
	8 Hour	9.0 ppm (10 mg/m³)	9 ppm (10 mg/m³)	—
	8 Hour (Lake Tahoe)	6 ppm (7 mg/m³)	—	—
NO_2	AAM	0.030 ppm (57 µg/m³)	0.053 ppm (100 µg/m³)	Same as Primary
	1 Hour	0.18 ppm (339 µg/m³)	0.100 ppm (188 µg/m³)	—
SO_2	24 Hour	0.04 ppm (105 µg/m³)	—	—
	3 Hour	—	—	0.5 ppm (1,300 µg/m³)
	1 Hour	0.25 ppm (655 µg/m³)	0.075 ppm (196 µg/m³)	—
Lead	30-day Avg.	1.5 µg/m³	—	—
	Calendar Quarter	—	1.5 µg/m³	Same as Primary
	Rolling 3-month Avg.	—	0.15 µg/m³	
Visibility Reducing Particles	8 Hour	Extinction coefficient of 0.23 per km – visibility ≥ 10 miles (0.07 per km – ≥30 miles for Lake Tahoe)	**No National Standards**	
Sulfates	24 Hour	25 µg/m³		
Hydrogen Sulfide	1 Hour	0.03 ppm (42 µg/m³)		
Vinyl Chloride	24 Hour	0.01 ppm (26 µg/m³)		

O_3: ozone; ppm: parts per million; µg/m³: micrograms per cubic meter; PM10: respirable particulate matter 10 microns or less in diameter; AAM: Annual Arithmetic Mean; —: No Standard; PM2.5: fine particulate matter 2.5 microns or less in diameter; CO: carbon monoxide; mg/m³: milligrams per cubic meter; NO_2: nitrogen dioxide; SO_2: sulfur dioxide; km: kilometer.

[a] *National Primary Standards:* The levels of air quality necessary, within an adequate margin of safety, to protect the public health.

[b] *National Secondary Standards:* The levels of air quality necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant.

Note: More detailed information in the data presented in this table can be found at the CARB website (www.arb.ca.gov).

Source: CARB 2016

The SCAQMD was established in 1977 by merging the individual air pollution control districts of the four counties within the SoCAB: Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino counties. The SCAQMD in coordination with local governments and the private sector, develops the Air Quality Management Plan (AQMP) for the SoCAB to meet NAAQS and CAAQS. The AQMP is the most important air management document for the SoCAB because it provides the blueprint for meeting State and federal ambient air quality standards.

The current regional plan applicable to the Project is SCAQMD's 2022 AQMP. The SCAQMD is responsible for ensuring that the SoCAB meets the NAAQS and CAAQS by reducing emissions from stationary (area and point), mobile, and indirect sources. To accomplish this goal, the SCAQMD prepares AQMPs in conjunction with the Southern California Association of Governments (SCAG), County transportation commissions, and local governments; develops rules and regulations; establishes permitting requirements for stationary sources; inspects emissions sources; and enforces such measures through educational programs or fines, when necessary, as indicated above.

Sensitive Air Quality Receptors

Sensitive receptors include, but are not limited to, children, the elderly, persons with preexisting respiratory or cardiovascular illness, and athletes and others who engage in frequent exercise. These sensitive receptor uses include, but are not limited to, sensitive receptors at schools, parks, hospitals, high-density residential areas, and convalescent homes. The closest sensitive receptors to the Project site are the mobile home park that occupies the frontage along the south side of Compton Boulevard, 80 feet south of the Project site. Other sensitive receptors include Saint Albert the Great Middle School, located 230 feet to the east of the Site and the apartments located 175 feet to the northeast.

SCAQMD Thresholds of Significance

The SCAQMD's Air Quality Analysis Handbook provides significance thresholds for both construction and operation of projects within the SCAQMD's jurisdictional boundaries (SCAQMD 2023). The SCAQMD recommends that projects be evaluated in terms of the quantitative thresholds established to assess both the regional and localized impacts of project-related air pollutant emissions. The County of Los Angeles uses the current SCAQMD thresholds to determine whether a proposed project would have a significant impact. These SCAQMD thresholds are identified in Table 4.

TABLE 4
SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
AIR QUALITY SIGNIFICANCE THRESHOLDS

Mass Daily Thresholds[a]		
Pollutant	**Construction**	**Operation**
NOx	100 lbs/day	55 lbs/day
VOC	75 lbs/day	55 lbs/day
PM10	150 lbs/day	150 lbs/day
PM2.5	55 lbs/day	55 lbs/day
SOx	150 lbs/day	150 lbs/day
CO	550 lbs/day	550 lbs/day
Lead	3 lbs/day	3 lbs/day
TACs, Odor, and GHG Thresholds		
TACs (including carcinogens and non-carcinogens)	Maximum Incremental Cancer Risk ≥ 10 in 1 million Cancer Burden > 0.5 excess cancer cases (in areas ≥ 1 in 1 million) Chronic & Acute Hazard Index ≥ 1.0 (project increment)	
Odor	Project creates an odor nuisance pursuant to South Coast AQMD Rule 402	
GHG	10,000 MT/yr CO_2e for industrial facilities	
Ambient Air Quality Standards for Criteria Pollutants[b, c]		
NO_2 1-hour average annual arithmetic mean	South Coast AQMD is in attainment; project is significant if it causes or contributes to an exceedance of the following attainment standards: 0.18 ppm (State) 0.03 ppm (State) and 0.0534 ppm (federal)	
PM10 24-hour average annual average	10.4 µg/m³ (construction)[c] & 2.5 µg/m³ (operation) 1.0 µg/m³	
PM2.5 24-hour average	10.4 µg/m³ (construction)[c] & 2.5 µg/m³ (operation)	
SO_2 1-hour average 24-hour average	0.25 ppm (State) & 0.075 ppm (federal – 99th percentile) 0.04 ppm (State)	
Sulfate 24-hour average	25 µg/m³ (State)	
CO 1-hour average 8-hour average	South Coast AQMD is in attainment; project is significant if it causes or contributes to an exceedance of the following attainment standards: 20.0 ppm (State) and 35 ppm (federal) 9.0 ppm (State/federal)	
Lead 30-day average Rolling 3-month average	1.5 µg/m³ (State) 0.15 µg/m³ (federal)	

NOx: nitrogen oxides; lbs/day: pounds per day; VOC: volatile organic compound; PM10: respirable particulate matter with a diameter of 10 microns or less; PM2.5: fine particulate matter with a diameter of 2.5 microns or less; SOx: sulfur oxides; CO: carbon monoxide; TACs: toxic air contaminants; GHG: greenhouse gases; South Coast AQMD: South Coast Air Quality Management District; MT/yr CO_2e: metric tons per year of carbon dioxide equivalents; NO_2: nitrogen dioxide; ppm: parts per million; µg/m³: micrograms per cubic meter; SO_2: sulfur oxides; CO: carbon monoxide.

[a] Source: South Coast AQMD CEQA Handbook (South Coast AQMD 1993)
[b] Ambient air quality thresholds for criteria pollutants based on South Coast AQMD Rule 1303, Table A-2 unless otherwise stated
[c] Ambient air quality threshold is based on South Coast AQMD Rule 403

Source: South Coast AQMD 2023.

These regional emission thresholds cannot be used to correlate whether a specific health impact would occur to an individual receptor. These significance thresholds were developed to assist Lead Agencies with a consistent threshold that could be used to determine whether a project's emissions could significantly contribute to the total emissions occurring within an air basin. The totality of the air basin's emissions would determine whether it would be in attainment of the CAAQS and NAAQS.

LST Thresholds of Significance

Short-term local impacts to nearby sensitive receptors from on-site emissions of NO_2, CO, PM10, and PM2.5 are examined based on SCAQMD's localized significance threshold (LST) methodology. To assess local air quality impacts for development projects without complex dispersion modeling, the SCAQMD developed screening (lookup) tables to assist lead agencies in evaluating impacts. The LST method was developed to provide a conservative estimate of the level of project-generated air pollutants that have the potential to exceed the NAAQS or CAAQS, which could consequently result in adverse health impacts. Exceedance of the LST does not describe the prevalence or magnitude of health effects but rather assesses the potential for a project-related health effect to occur. The LST method cannot provide an estimate of health effects related to ozone. Reactive organic gases (ROGs) and NO_x are pollutants that contribute to the formation of ozone, otherwise known as ozone precursors. It would be too speculative to determine how an individual project could affect the formation of ozone, and how it could affect the health for a specific receptor: ozone does not fully form within the proximity of a project site, and the formation of ozone is affected by solar irradiance, meteorological conditions, presence of ozone precursors from other sources, and other factors. As such, modeling of ozone concentrations is conducted on the "macro" scale of an air basin for all pollutant sources within the basin, and not for an individual project. Consequently, the LST analysis focuses on a project-level analysis of the four criteria pollutants of greatest concern (CO, NO_x, PM_{10}, and $PM_{2.5}$).

The LST method is recommended to be limited to projects that would involve five acres or less of site disturbance on its peak day. For the purposes of an LST analysis, SCAQMD considers receptors where it is possible that an individual could remain for 1 hour for NO_2 and CO exposure and 24 hours for PM10 and PM2.5 exposure. The emissions limits in the lookup tables are based on the SCAQMD's Ambient Air Quality Standards (SCAQMD 2022).

Impact Analysis

Would the Project:

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

Less than Significant Impact. As discussed above, the SCAQMD develops rules and regulations, establishes permitting requirements for stationary sources, inspects emissions sources, and enforces such measures through educational programs or fines, when necessary. The SCAQMD is directly responsible for reducing emissions from stationary (area and point), mobile, and indirect sources and has prepared an AQMP that establishes a program of rules and regulations directed at attaining the NAAQS and CAAQS.

The current regional plan applicable to the Project is SCAQMD's 2022 AQMP. The SCAQMD is responsible for ensuring that the SoCAB meets the NAAQS and CAAQS by reducing emissions from stationary (area and point), mobile, and indirect sources. To accomplish this goal, the SCAQMD prepares AQMPs in conjunction with the Southern California Association of Governments (SCAG), County transportation commissions, and local governments; develops rules and regulations; establishes permitting requirements for stationary sources; inspects emissions sources; and enforces such measures through educational programs or fines, when necessary, as indicated above.

The 2022 AQMP was adopted on December 2, 2022, by the SCAQMD Governing Board. The 2022 AQMP is a regional and multi-agency effort among the SCAQMD, CARB, SCAG, and USEPA. The 2022 AQMP includes an analysis of emissions, meteorology, atmospheric chemistry, regional growth projections, and the impact of existing control measures. The purpose of the 2022 AQMP is to set forth a comprehensive program that would promote reductions in criteria pollutants, greenhouse gases (GHGs), and toxic risk and efficiencies in energy use, transportation, and goods movement. The 2022 AQMP incorporates the latest scientific and technical information and planning assumptions, including SCAG's 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS); updated emission inventory methods for various source categories; and SCAG's latest growth forecasts. The 2022 AQMP includes strategies and measures necessary to meet the NAAQS. The AQMP is based on projections of energy usage and vehicle trips from land uses within the SoCAB.

The main purpose of an AQMP is to bring an area into compliance with the requirements of federal and State air quality standards. For a project to be consistent with the AQMP, the pollutants emitted from the project should not (1) exceed the SCAQMD CEQA air quality significance thresholds or (2) conflict with or exceed the assumptions in the AQMP.

With respect to the first criterion, based on the air quality modeling analysis conducted for the proposed Project, provided below, construction and operation of the Project would not exceed the SCAQMD's CEQA thresholds of significance and consequently would not result in an increase in the frequency or severity of existing air quality violations nor cause or contribute to new violations, or delay timely attainment of air quality standards or the interim emissions reductions in the AQMP. Therefore, the Project is consistent with the first criterion.

With respect to the second criterion, the proposed Project was assessed as to whether it would exceed the assumptions in the AQMP. Both the MLOC and LOC Sites have a General Plan land use designation of Light Industrial (IL) (Los Angeles County 2014), which allows for light industrial uses, including light manufacturing, assembly, warehouse and distribution (Los Angeles County 2024a).

The proposed Project is consistent with the General Plan's vision, which in turn is consistent with the AQMP (refer to Section 4.11 – Land Use and Planning for a more detailed discussion regarding the Project's consistency with the County General Plan). The proposed Project is not anticipated to exceed the AQMP assumptions for the Project site and is found to be consistent with the AQMP for the second criterion. Therefore, the Project would not result in

an inconsistency with the SCAQMD's 2022 AQMP. Less than significant impacts would occur, and no mitigation is required.

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?

Less than Significant Impact. A project may have a significant impact where project-related emissions would exceed federal, State, or regional standards or thresholds, or where project-related emissions would substantially contribute to an existing or projected air quality violation. As identified in Table 4, Los Angeles County is a nonattainment area for O_3, PM10, and PM2.5. The Project would generate PM10, PM2.5, and O_3 precursors (NOx and volatile organic compound [VOC]) during short-term construction and long-term operations. The SCAQMD has developed construction and operations thresholds to determine whether projects would considerably contribute toward a violation of ambient air quality standards.

Construction Activities

Air pollutant emissions would occur from construction equipment exhaust; dust from demolition and excavation activities; exhaust and particulate emissions from trucks hauling demolition and construction debris, soil, and other materials to and from the Project site; from automobiles and light trucks driven to and from the Project site by construction workers; and VOCs from asphalt paving operations. The proposed Project would comply with applicable SCAQMD rules and regulations, including Rule 403 (AQ-RR-1) for fugitive dust control. Rule 403 measures include regular watering of active grading areas and unpaved roads, limiting vehicle speeds on unpaved surfaces, stabilizing stockpiled earth, and curtailing grading operations during high wind conditions. Watering of active grading and demolition areas is included in the California Emissions Estimator Model (CalEEMod) emissions analysis and results in reduced PM10 and PM2.5 emissions. Emission reductions associated with compliance with this rule have been included in the emissions calculations. A summary of CalEEMod inputs utilized for the quantification of emissions is provided below:

Construction Phase	Duration	Equipment Used	Import/Export of Material	One Way Haul Truck Trip Distance
Demolition of remaining ASTs and process equipment	1/1/2025-1/31/2025	1 Concrete/Industrial Saw 3 Excavators 2 Rubber Tired Dozers	None	*55 miles (Simi Valley Landfill)*
Excavation/Demolition - Underground sumps, trenches, and pipelines	2/1/2025-3/31/2025	1 Rubber Tired Dozer 3 Tractors/Loaders/Backhoes 1 Excavator 1 Grader	200 CY Inert Soil 2.3 tons of pipe	*55 miles (Simi Valley Landfill)*
Excavation - Removal of contaminated soil	32/1/2025 - 3/31/2025	1 Excavator	80 CY Contaminated soil	*314 miles (Nevada Facility)*
SVE Well Construction	2/1/2025-3/31/2025	1 Bore/Drill Rig 2 Forklifts 2 Welders	None	*55 miles (Simi Valley Landfill)*
Re-paving	4/1/2026-4/28/2026	1 Cement and Mortar Mixers 1 Paver 2 Paving Equipment 2 Rollers 1 Tractor/ Loader/ Backhoe	None	*55 miles (Simi Valley Landfill)*

The Project would involve the export of both inert (non-contaminated) soil/materials and contaminated soil. The following export locations have been identified as potential sites for the placement of exported materials:

Inert Materials

- Azusa Land Reclamation Landfill (34 miles - Azusa, CA)
- Chiquita Canyon Landfill (54 miles - Santa Clarita, CA)
- Simi Valley Landfill (55 miles - Simi Valley, CA)

Contaminated Materials

- Soil Safe (95 miles - Adelanto, CA)
- US Ecology Facility (314 miles - Beatty, NV)

Regional Emissions Thresholds – Maximum Daily Regional Emissions

Table 5, Estimated Maximum Daily Regional Construction Emissions, presents the estimated maximum daily emissions during construction of the proposed Project and compares the estimated emissions with the SCAQMD's daily regional emission thresholds. As shown in Table 5, Project construction mass daily emissions would be less than the SCAQMD's thresholds for all criteria air pollutants, and the impact would be less than significant. No mitigation is required.

TABLE 5
ESTIMATED MAXIMUM DAILY REGIONAL CONSTRUCTION EMISSIONS

Year	Emissions (lbs/day)					
	VOC	**NOx**	**CO**	**SO_2**	**PM10**	**PM2.5**
2025	2	23	27	<1	4	2
2026	1	7	10	<1	1	<1
Maximum Daily Emissions	**2**	**23**	**27**	**<1**	**4**	**2**
SCAQMD Thresholds	***75***	***100***	***550***	***150***	***150***	***55***
Exceeds SCAQMD Thresholds?	**No**	**No**	**No**	**No**	**No**	**No**

lbs/day: pounds per day; VOC: volatile organic compound; NOx: nitrogen oxides; CO: carbon monoxide; SO_2: sulfur dioxide; PM10: respirable particulate matter 10 microns or less in diameter; PM2.5: fine particulate matter 2.5 microns or less in diameter; SCAQMD: South Coast Air Quality Management District.

Source: SCAQMD 2023 (thresholds); see Appendix C for CalEEMod model outputs.

Operational Activities

Project operations would involve the operation of 1 SVE system and 1 air sparging system, located at the Leach Oil site; surface piping would be connected to these systems and fed into the ground at various locations throughout the Project site.

Regional Emissions Thresholds – Maximum Daily Regional Emissions

Table 6, Estimated Maximum Daily Regional Operational Emissions, presents the estimated maximum daily emissions during operation of the proposed Project and compares the estimated emissions with the SCAQMD's daily regional emission thresholds. As shown in Table 6, Project operation mass daily emissions would be less than the SCAQMD's thresholds for all criteria air pollutants, and the impact would be less than significant. No mitigation is required.

TABLE 6
ESTIMATED MAXIMUM DAILY REGIONAL OPERATIONAL EMISSIONS

Year	Emissions (lbs/day)					
	VOC	**NOx**	**CO**	**SO_2**	**PM10**	**PM2.5**
Mobile	<1	<1	<1	<1	<1	<1
Area	<1	<1	<1	<1	<1	<1
Energy	<1	<1	<1	<1	<1	<1
Water	<1	<1	<1	<1	<1	<1
Waste	<1	<1	<1	<1	<1	<1
SCAQMD Thresholds	***75***	***100***	***550***	***150***	***150***	***55***
Exceeds SCAQMD Thresholds?	**No**	**No**	**No**	**No**	**No**	**No**

The Project would be required to comply with SCAQMD Rule 1166, VOC Emissions From Decontamination of Soil (AQ-RR-2). Rule 1166 requires an approved mitigation plan be obtained from SCAQMD prior to commencing the excavation or grading of soil containing

VOCs. Rule 1166 requires effective strategies for maintaining VOC levels within regulatory limits, such as segregating VOC-contaminated stockpiles from non-VOC-contaminated stockpiles such that mixing of the stockpiles does not take place; spraying VOC-contaminated soil stockpiles with water and/or approved vapor suppressant and covering them with plastic sheeting for all periods of inactivity lasting more than one hour; and conducting a daily visual inspection of all covered VOC-contaminated soil stockpiles to ensure the integrity of the plastic-covered surfaces, and keeping a daily inspection record. Additionally, in compliance with Rule 1166, all contaminated soil would be safely exported off-site to approved treatment facilities. The Project would either export contaminated soil to Soil Safe located in Adelanto, California or the US Ecology Facility located in Beatty, Nevada. All necessary SCAQMD permits would be obtained prior to pilot testing and full-scale operation of the SVE and air sparging systems. Implementation of regulatory requirements prior to and during Project construction and operations would minimize the potential for air quality impacts. As shown above, the Project's operational emissions would be less than the SCAQMD CEQA significance thresholds for all criteria pollutants. Therefore, the Project's operational impact on regional emissions would be less than significant, and no mitigation is required.

c) Expose sensitive receptors to substantial pollutant concentrations?

Less than Significant Impact. A significant impact may occur when a project generates pollutant concentrations to a degree that would significantly affect sensitive receptors, which include populations that are more susceptible to the effects of air pollution than the population at large. Exposure of sensitive receptors is addressed for the following situations: Construction-phase localized emissions, carbon monoxide (CO) hotspots, and toxic air contaminants (TACs, specifically diesel particulate matter [DPM]) from on-site construction. Operational, long-term TACs may be generated by some industrial land uses; commercial land uses (e.g., gas stations and dry cleaners); and diesel trucks on freeways and are therefore addressed qualitatively.

Construction-Phase Localized Significance Thresholds

As stated above, in addition to the mass daily emissions thresholds established by the SCAQMD, short-term local impacts to nearby sensitive receptors from on-site emissions of NO_2, CO, PM10, and PM2.5 are examined based on SCAQMD's localized significance threshold (LST) methodology, which is recommended to be limited to projects that would result in five acres or less of site disturbance on the peak day. The emissions screening thresholds used in this analysis are for receptors within 25 meters (82 feet) of the Project site for NO_x, and CO, PM10, and PM2.5; the thresholds for receptors farther away would be higher, and the Project emissions would be a smaller fraction of the thresholds.

SCAQMD recommends calculating the Project disturbance area by assigning the values contained in Table 7, below, to the Project's construction equipment mix (SCAQMD).

TABLE 7
SCAQMD LST METHODOLOGY:
SITE DISTURBANCE BY EQUIPMENT TYPE

Equipment Type	Acres/8hr-day
Crawler Tractors	0.5
Graders	0.5
Rubber Tired Dozers	0.5
Scrapers	1

SCAQMD 2008

Table 8, below, details the number of construction equipment that are anticipated to be used during the peak day of each construction phase; the third column of Table 8 indicates the maximum amount of site acreage on each phase's peak day, in accordance with SCAQMD LST Methodology.

TABLE 8
CONSTRUCTION EQUIPMENT AND MAXIMUM SITE DISTURBANCE BY CONSTRUCTION PHASE

Construction Phase	Equipment Used	Acres of Site Disturbance/8-hr Day *
Demolition of remaining ASTs and process equipment	1 Concrete/Industrial Saw 3 Excavators 2 Rubber Tired Dozers	1
Excavation/Demolition - Underground sumps, trenches, and pipelines	1 Rubber Tired Dozer 3 Tractors/Loaders/Backhoes 1 Excavator 1 Grader	1
Excavation - Removal of contaminated soil	1 Excavator	0
SVE Well Construction	1 Bore/Drill Rig 2 Forklifts 2 Welders	0
Re-paving	1 Cement and Mortar Mixers 1 Paver 2 Paving Equipment 2 Rollers 1 Tractor/Loader/Backhoe	0

*Calculated based on SCAQMD LST Methodology (SCAQMD 2008)

Based on the values in the tables above, Project construction would result in 1 acre of site disturbance on the peak day. The thresholds shown are from the lookup tables for a site disturbance area that is 1 acre. Maximum daily particulate emissions would occur during the Excavation/Demolition phase, while maximum NOx and CO emissions would occur during the Demolition of Remaining ASTs and Process Equipment phase. As shown in Table 9, localized emissions for all criteria pollutants would be less than their respective screening

thresholds. Therefore, localized air quality impacts would be less than significant, no mitigation is required.

TABLE 9
CONSTRUCTION-PHASE
LOCALIZED SIGNIFICANCE THRESHOLD EMISSIONS

Emissions and Thresholds	Emissions (lbs/day)			
	NOx	CO	PM10	PM2.5
Project maximum daily on-site emissions	**22**	**20**	**3**	**2**
Localized Significance Threshold	**46**	**231**	**4**	**3**
Exceed threshold?	**No**	**No**	**No**	**No**

lbs/day: pounds per day; NOx: nitrogen oxides; CO: carbon monoxide; PM10: respirable particulate matter 10 microns or less in diameter; PM2.5: fine particulate matter 2.5 microns or less in diameter.

Note: Data is for SCAQMD Source Receptor Area 12, South Central Los Angeles County

Source: SCAQMD 2009 (thresholds); see Appendix C for CalEEMod model outputs.

Carbon Monoxide Hotspot

In an urban setting, vehicle exhaust is the primary source of CO. Consequently, the highest CO concentrations generally are found close to congested intersections. Under typical meteorological conditions, CO concentrations tend to decrease as the distance from the emissions source (e.g., congested intersection) increases. The proposed Project would result in a negligible increase in peak morning and evening traffic volumes resulting from construction and Project site maintenance during operations. The Project contribution of vehicle trips are not of sufficient magnitude to result in a substantial contribution to CO concentrations at localized intersections. As such, Project-related vehicles would not result in a significant impact related to CO hotspots.

Toxic Air Contaminant Emissions from On-Site Construction

Construction activities would result in short-term, Project-generated emissions of DPM from the exhaust of off-road, heavy-duty diesel equipment used for site preparation (e.g., demolition, excavation, and grading); paving; building construction; and other miscellaneous activities. CARB identified DPM as a TAC in 1998. The dose to which receptors are exposed is the primary factor used to determine health risk. Dose is a function of the concentration of a substance or substances in the environment and the duration of exposure to the substance. Thus, the risks estimated for a maximally exposed individual are higher if a fixed exposure occurs over a longer time period. According to the Office of Environmental Health Hazard Assessment, health risk assessments—which determine the exposure of sensitive receptors to TAC emissions—should be based on a 40-year exposure period; however, such assessments should be limited to the period/duration of activities associated with the Project.

There would be relatively few pieces of off-road, heavy-duty diesel equipment in operation, and the total construction period of approximately 482 days would be relatively short when compared to a 40-year exposure period. The period for which offroad construction

equipment is used would be even less. Combined with the highly dispersive properties of DPM and additional reductions in particulate emissions from newer construction equipment, as required by USEPA and CARB regulations, construction emissions of TACs would not expose sensitive receptors to substantial emissions of TACs. The impact would be less than significant, and no mitigation is required.

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

Less than Significant Impact. Potential operational odors could be created by short term operation of diesel-fueled construction equipment at the Project site. These odors would be temporary and would not constitute a significant impact. According to the SCAQMD's *CEQA Air Quality Handbook*, land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding (SCAQMD 1993). The proposed Project does not include any uses identified by the SCAQMD as being associated with odors and, therefore, would not produce objectionable odors. The Project uses are also regulated from nuisance odors or other objectionable emissions by SCAQMD Rule 402. Rule 402 prohibits the discharge from any source of air contaminants or other material which would cause injury, detriment, nuisance, or annoyance to people or the public. The proposed Project is not considered by the SCAQMD to constitute a public nuisance. As such, the Project would have a less than significant impact with regard to other emissions. No mitigation is required. In 2010, removal of liquid and sludge from the Skim Pond occurred. Soils within the former skim pond will be removed and are expected to have little or no odor. The SVE system off gases will either be destroyed using a thermal oxidizer or captured in carbon vessels, which will avoid fugitive odors. During SVE operation, any fugitive emissions will be within the limits in accordance with the SCAQMD permit for the Site.

Mitigation Measures

Project implementation would not result in significant impacts related to Air Quality; therefore, no mitigation measures are required.

4.4 BIOLOGICAL RESOURCES

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	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 or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☒	☐
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☐	☒
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒

Impact Analysis

Would the Project:

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 or U.S. Fish and Wildlife Service?

No Impact. The Project site is within an urban area and surrounded by a mix of light industrial/manufacturing uses. The entire Project site and immediate surrounding areas are developed and do not support native plant communities or native habitat. The site contains minimal scattered ornamental trees and some ruderal vegetation (around the skim pond), and no native vegetation or habitat occurs on-site.

Due to the high level of anthropogenic disturbances onsite and in the surrounding are, no special-status reptilian species are expected to occur within the Project site. Due to the

nature of the site, it provides minimal foraging habitat for bird or mammal species that have adapted to human disturbance. Common animal species that are typically found in urban areas, such as small mammals, birds, small reptiles, and insects may occur onsite, but the site does not provide natural habitats for sensitive plant and animal species.

Review of the U.S. Fish and Wildlife Service's (USFWS') Critical Habitat for Threatened and Endangered Species shows there are no designated critical habitat areas on or near the Project site (USFWS 2024). The nearest critical habitat is in Palos Verdes, approximately 10 miles to the southwest.

Since there are no natural or sensitive biological resources on the Project site, the proposed Project would not impact any candidate, sensitive, or special status species, as identified in the local or regional plans, policies, or regulations by the California Department of Fish and Wildlife (CDFW) or USFWS. There would be no impact on sensitive species, and no mitigation is required.

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 Wildlife or US Fish and Wildlife Service?

No Impact. Riparian habitat is composed of trees and other vegetation and physical features normally found on the stream banks and flood plains associated with streams, lakes, or other bodies of water. The Project site and the surrounding area are largely urbanized and surrounded by existing development. The site supports minimal scattered vegetation and does not contain riparian habitat or sensitive natural vegetation communities identified by CDFW and USFWS. There would be no impact pertaining to riparian habitats or sensitive natural vegetation communities, and no mitigation is required.

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?

No Impact. The Project site is largely paved and does not support State or federally protected wetlands. There are no jurisdictional drainages or wetlands located on the Project site. Therefore, no impacts associated with federally protected wetlands would occur, and no mitigation is required.

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?

Less than Significant Impact. The Project site is fully developed and is surrounded by a mix of light industrial/manufacturing uses and roadways. As shown on General Plan Figure 9.2, Regional Habitat Linkages, the Project site is isolated from regional wildlife corridors and linkages (Los Angeles County 2014c). In addition, there are no riparian corridors, creeks, or useful patches of steppingstone habitat (natural areas) within or connecting the Project site to any identified wildlife corridors or linkages. As a result, implementation of the proposed Project would not disrupt or have any adverse effects on any migratory corridors or linkages

in the surrounding area. The Project would not affect the movement of any native resident or migratory fish or wildlife species or established native resident or migratory wildlife corridors, as the Project is part of none. Also, there are no native wildlife nursery sites on or near the Project site.

Due to the presence of trees and vegetation on the Project site, there is the potential for birds protected by the Federal Migratory Bird Treaty Act (MBTA) and Sections 3503, 3503.5, and 3513 of the California Fish and Game Code to nest at the site. The MBTA protects common and special status migratory birds and their nests and eggs. Bird species protected under the provisions of the MBTA are identified by the List of Migratory Birds (50 CFR Section 10.13, as amended). Multiple sections of California Fish and Game Code provide protection for nesting birds and raptors. Section 3503 makes it unlawful to take, possess, or needlessly destroy the nest or eggs of any bird. Section 3503.5 specifically addresses raptors (i.e., birds of prey in the orders Falconiformes and Strigiformes) and makes it unlawful to take, possess, or destroy these birds or their nests or eggs. Section 3513 prohibits the take or possession of migratory non-game birds or any part of such bird, as designated by the MBTA. As such, the Project is subject to all requirements as set forth by the MBTA during construction and operations.

Overall, potential impacts related to interference with the movement of any native resident or migratory fish or wildlife species or with an established native resident or migratory wildlife corridor, or the use of native wildlife nursery sites would be less than significant, and no mitigation would be required.

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

No Impact. As stated above, the Project site is fully developed and located within an area surrounded by light industrial/manufacturing uses and roadways with no existing native or sensitive biological resources on-site.

The Project does not include any trees on-site and therefore would not affect the County's tree preservation policies including the Oak Tree Ordinance and Los Angeles County Oak Woodlands Conservation Management Plan. Additionally, as shown on General Plan Figure 9.3, Significant Ecological Areas and Coastal Resources Areas Policy Map, the Project site is not located within Significant Ecological Areas (SEA) or Coastal Resources Area (Los Angeles County 2015). Therefore, no impact would occur related to a conflict with local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance, and no mitigation is required.

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?

No Impact. The Project site is not within the boundaries of any adopted Habitat Conservation Plan (HCP), Natural Community Conservation Plan (NCCP), or other approved local, regional, or State habitat conservation plan. Therefore, the proposed Project would not

conflict with the provisions of an adopted HCP, NCCP, or other approved conservation plan. No impacts would occur, and no mitigation is required.

Mitigation Measures

Project implementation would not result in significant impacts related to Biological Resources; therefore, no mitigation measures are required.

4.5 CULTURAL RESOURCES

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

Introduction

Existing Setting

Background research was conducted on the Project site to establish a thorough and accurate historic context and to confirm the development history of the property. This included a search of historic and archaeological records (0.5-mile radius around the site) conducted by Psomas on November 4, 2024, at the South-Central Coastal Information Center (SCCIC), located on the campus of California State University, Fullerton. The SCCIC houses records of the California Historical Resources Information System for Los Angeles, Orange, Ventura, and San Bernardino Counties. The Cultural Resources Record Search, including the SCCIC records, is included in Appendix D of this IS/ND.

The SCCIC record search identified two prior cultural resources studies (Table 10) within the 0.5-mile search radius; however, neither of the two studies occurred within the Project site.

TABLE 10
CULTURAL RESOURCE STUDIES WITHIN 0.5-MILE OF THE PROJECT SITE

Report No.	Year	Author(s)	Affiliation	Type of Study	Title of Study	Proximity to Project Site
LA-01290	1983	Chavez, David		Archaeological, Field study	Cultural Resources Evaluation for the Compton Co-generation Plant, City of Compton, California	Outside
LA-07400	2005	Billat, Lorna	EarthTouch, Inc.	Archaeological, Field study	Project Name: Darlan, Project Number: CA-6374a	Outside

Source: SCCIC, 2024.

The SCCIC records search did identify one previously recorded cultural resource (built environment resource) within a 0.5-mile of the Project site. Cultural Resource P-19-190179 is identified as McKinley Elementary School. The school includes two buildings, which are examples of educational architecture from their respective periods. The main building of the elementary school campus was designed by T.C. Kistner and completed in 1927, and the kindergarten building (circa 1940s) is located just south of the main building. The school is not located within the Project site.

Historic Map Review

United States Geological Survey (USGS) historic maps indicate that in 1896 there was one road and one building within the Project area. There were several additional roads, buildings and two intermittent streams within the Project's 0.5-mile search radius. In 1944, at least three buildings were built within the Project area. There was an increase in development within the 0.5-mile search radius, which included several additional roads and buildings. Oil wells and the Spanish American Institute were also located nearby. The previously mentioned intermittent stream no longer appeared.

Impact Analysis

Would the Project:

a) Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?

No Impact. A significant impact could occur if the Project were to disturb historic resources that presently exist within the Project site. Section 15064.5 of the CEQA Guidelines generally defines a historic resource as a resource that is (1) listed in or determined to be eligible for listing in the California Register of Historical Resources (California Register); (2) included in a local register of historical resources (pursuant to Section 5020.1(k) of the Public Resources Code); or (3) identified as significant in an historical resources survey (meeting the criteria in Section 5024.1(g) of the Public Resources Code). Additionally, any object, building, structure, site, area, place, record, or manuscript that a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing on the California Register. The California Register automatically includes all properties listed in the National Register of Historic Places (NRHP) and those formally determined to be eligible for listing in the National Register.

The SCCIC record search and literature review identified one built structure that may be considered a historic resource near the Project site. McKinley Elementary School (P-19-190179) is located approximately 0.4-mile south of the Project site, but outside of the proposed area of work. Therefore, the Project would not cause an adverse change in the significance of a historical resource. No impact would occur, and no mitigation is required.

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

No Impact. Based on the records searches conducted, no archaeological resources were discovered on the Project site or within the 0.5-mile search radius of the site. While there is always a possibility that buried historical and/or archaeological materials would be uncovered during necessary subsurface excavations for a project, given the nature of the proposed Project and that no grading and construction activities would occur as part of the Project, uncovering buried resources is unlikely. Therefore, no impacts pertaining to adverse change in significance of an archaeological resource would occur, and no mitigation is required.

c) Disturb any human remains, including those interred outside of formal cemeteries?

No Impact. There is no indication that human remains are present within the Project site, and the SCCIC records search does not identify evidence of human remains within the 0.5-mile search radius of the site. There are State and federal regulations in place in case of disturbance to human remains during grading and excavation; however, given the nature of the proposed Project and that no grading and construction activities would occur as part of the Project, uncovering and/or disturbing human remains would be unlikely. Therefore, no impact on human remains would occur, and no mitigation is required.

Mitigation Measures

Project implementation would not result in significant impacts related to Cultural Resources; therefore, no mitigation measures are required.

4.6 ENERGY

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

Impact Analysis

Energy calculations and data are provided in Appendix E to this IS/ND.

Existing Setting

Southern California Edison (SCE) and the Southern California Gas Company (SCGC) are utility companies that currently provide and would continue to provide electrical and natural gas services to the Project site.

Regulatory Setting

Federal

Energy Independence and Security Act of 2007

The Energy Independence and Security Act (EISA) of 2007 (Public Law 110–140) seeks to provide the nation with greater energy independence and security by increasing the production of clean renewable fuels; improving vehicle fuel economy; and increasing the efficiency of products, buildings, and vehicles. It also seeks to improve the energy performance of the federal government. The EISA sets increased Corporate Average Fuel Economy Standards; the Renewable Fuel Standard; appliance energy efficiency standards; building energy efficiency standards; and accelerated research and development tasks on renewable energy sources (e.g., solar energy, geothermal energy, and marine and hydrokinetic renewable energy technologies), carbon capture, and sequestration.

State

CEQA

The CEQA Guidelines, Section 15126.2(b), acknowledge that wasteful, inefficient, or unnecessary use of energy, or wasteful use of energy resources, may result in a significant environmental impact, and Appendix F of the CEQA Guidelines, is based on the requirement in California Public Resources Code Section 21100(b)(3) that mitigation measures be proposed to "reduce the wasteful, inefficient, and unnecessary consumption of energy."

Appendix F states, in relevant part:

> The goal of conserving energy implies the wise and efficient use of energy. The means of achieving this goal include:
>
> 1. Decreasing overall per capita energy consumption,
> 2. Decreasing reliance on fossil fuels such as coal, natural gas, and oil, and
> 3. Increasing reliance on renewable energy sources.

Appendix F further requires EIRs to include a discussion of the potential energy impacts of the proposed projects.

Renewables Portfolio Standard

The California Renewables Portfolio Standard (RPS) was established in 2002 under Senate Bill (SB) 1078 and was amended in 2006 and 2011. The RPS program requires investor-owned utilities, electric service providers, and community choice aggregators to increase the use of eligible renewable energy resources to 33 percent of total procurement by 2020. The CPUC is required to provide quarterly progress reports regarding the State's progress toward RPS goals.

Senate Bill 350

SB 350, signed on October 7, 2015, is the Clean Energy and Pollution Reduction Act of 2015. SB 350 implements some of the goals of Executive Order (EO) B-30-15. Based on California Legislative Information 2015, the objectives of SB 350 are:

1. To increase from 33 percent to 50 percent, the procurement of California's electricity from renewable sources; and
2. To double the energy efficiency savings in electricity and natural gas final end uses of retail customers through energy efficiency and conservation.

The text of SB 350 sets a December 31, 2030 target for 50 percent of electricity to be generated from renewable sources. The RPS requires the public utilities within California to achieve 100 percent electricity generation from renewable energy sources by 2045.

California Energy Commission

In 1974, the California Energy Commission (CEC) was created to be the State's principal energy planning organization and to meet the energy challenges facing the State in response to the 1973 oil embargo. The CEC is charged with seven basic responsibilities when designing State energy policy:

- Advancing State Energy Policy;
- Achieving Energy Efficiency;
- Certifying Thermal Power Plants;

- Investing in Energy Innovation;
- Transforming Transportation;
- Developing Renewable Energy; and
- Preparing for Energy Emergencies.

State Alternative Fuels Plan

AB 118 requires the CEC to prepare a plan to increase the use of alternative fuels in California. The State Alternative Fuels Plan was prepared by the CEC with the CARB and in consultation with other federal, State, and local agencies to reduce petroleum consumption, to increase use of alternative fuels (e.g., ethanol, natural gas, liquefied petroleum gas, electricity, and hydrogen), to reduce greenhouse gas (GHG) emissions, and to increase in-state production of biofuels. The State Alternative Fuels Plan recommends a strategy that combines private capital investment, financial incentives, and advanced technology that will increase the use of alternative fuels, result in significant improvements in the energy efficiency of vehicles and reduce trips and vehicle miles traveled through changes in travel habits and land management policies.

Local

Los Angeles County – OurCounty Climate Action Plan

At a local level, the County has adopted OurCounty, the Los Angeles Countywide Sustainability Plan (County of Los Angeles 2019). OurCounty is identifies 12 goals that outline the vision for a sustainable Los Angeles County. The plan identifies lead County entities and partners who will work to bring the 12 goals to fruition, implementing related strategies and actions identified in the document (Los Angeles County 2019).

Los Angeles County General Plan

The Los Angeles County General Plan has developed policy actions that would assist in energy conservation within the County. The Conservation and Natural Resources Element guides the long-term conservation of natural resources and preservation of available open space areas. The following goals and policies are applicable to energy:

Goal C/NR 12: Sustainable management of renewable and non-renewable energy resources.

- Policy C/NR 12.1: Encourage the production and use of renewable energy resources.
- Policy C/NR 12.2: Encourage the effective management of energy resources, such as ensuring adequate reserves to meet peak demands.
- Policy C/NR12.3: Encourage distributed systems that use existing infrastructure and reduce environmental impacts.

Would the Project:

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

Less than Significant Impact. The following analysis evaluates the Project's potential to increase the demand for energy through construction and operation of the Project, day-to-day operations, and fuel consumption associated with Project construction.

Energy Consumption During Construction

Project construction would require the use of construction equipment for demolition; excavation; SVE/AS system installation; and re-paving activities. All off-road construction equipment is assumed to use diesel fuel. The use of non-diesel construction equipment is often not feasible for most construction projects due to power and efficiency needs, lack of infrastructure for refueling or recharging non-diesel equipment, cost of non-diesel equipment, and availability of non-diesel equipment. Construction also includes the vehicles of construction workers and vendors traveling to and from the Project site. Construction emissions are estimated for the Project using the CalEEMod model, as detailed in Section 4.3, Air Quality, of this IS/ND. Estimates of fuel consumption (diesel fuel and gasoline) from construction equipment, construction trucks, and construction worker vehicles are based on default construction equipment assumptions and trip estimates from CalEEMod and the Project team, and fuel efficiencies from the EMissions FACtor 2021 model (EMFAC 2021). Fuel consumption estimates are presented in Table 9, Project Energy Consumption Estimates During Construction. CalEEMod output sheets and detailed energy calculations are included in Appendix E. As shown in Table 11, Energy Use During Construction, a total of 9,024 gallons of gasoline and 7,994 gallons of diesel fuel is estimated to be consumed during Project construction.

TABLE 11
ENERGY USE DURING CONSTRUCTION

Source	Gasoline – gallons	Diesel Fuel – gallons
Construction Equipment	4,306	7,635
Worker Trips	3,417	8
Vendor Trips	1,301	13
Haul Trucks	0	337
Total	**9,024**	**7,994**

Sources: based on data from CalEEMod, OffRoad, and EMFAC2021. Energy data can be found in Appendix E to this IS/ND.

Fuel energy consumed during construction would be temporary in nature and would not represent a significant demand on energy resources. The Project would also implement best management practices such as requiring equipment to be properly maintained and minimize

idling. Furthermore, there are no unusual Project characteristics that would necessitate the use of construction equipment that would be less energy-efficient than at comparable construction sites in other parts of the State. Therefore, the proposed construction activities would not result in inefficient, wasteful, or unnecessary fuel consumption.

Operations

The energy consumption of a PEVES500 SVE system can vary significantly based on the size of the system, the contamination level, and the duration of operation. The PEVES500 would utilize electricity from the grid as a power source. Generally, energy consumption associated with the SVE systems is due to the continuous operation of blowers or vacuum pumps to extract vapors from the soil. The Project is required by the RWQCB to remediate various COCs present in the underlying soils and groundwater. As the Project is mandatory and since there are no alternatives to the SVE/AS system, the consumption of energy used to power the SVE/AS would not constitute a wasteful, unnecessary, or inefficient consumption of energy resources. Project operations during SVE startup would require up to two vehicle trips per day to the Site from Irvine (35 miles one way). For ongoing maintenance and measurements, once the system is operating there would be fewer trips to the Site to conduct O&M. These trips are expected to consume up to 504 gallons of gasoline. Energy consumption from maintenance activities was quantified and is presented below in Table 12.

TABLE 12
ENERGY USE DURING OPERATIONS

Land Use	Gasoline	Diesel	Natural Gas (kBTU/yr)	Electricity (kWh/yr)
Project Land Uses	504	0	0	0

kBTU/yr: one thousand British Thermal Units; kWh/yr: kilowatt hours per year.
Sources: Energy data can be found in Appendix E of this IS/ND.

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

Less than Significant Impact. The Project involves the implementation of a RAP that was prepared to remediate various COCs present in the underlying soils and groundwater. The Project's implementation is required by the RWQCB to remediate various COCs present in the underlying soils and groundwater. The implementation of the proposed Project would not conflict with, or obstruct, the implementation of the County General Plan and the OurCounty CAP. The Project's consistency with the aforementioned documents is discussed below.

Los Angeles County – OurCounty CAP

As discussed in Section 4.8 – Greenhouse Gas Emissions, the Project would not conflict with the County's OurCounty Climate Action Plan (CAP) as the Project's SVE and air sparging systems would utilize electricity rather than diesel fuel. In addition, the Project would

consume a nominal amount of energy during implementation of the RAP and operation of the SVE and air sparging systems. As such, the Project would not conflict with the goals outlined in the CAP and potential impacts would be less than significant.

Los Angeles County General Plan Conservation and Natural Resources Element

The Conservation and Natural Resources Element guides the long-term conservation of natural resources and preservation of available open space areas. The Conservation and Natural Resources Element addresses the following conservation areas: Open Space Resources; Biological Resources; Local Water Resources; Agricultural Resources; Mineral and Energy Resources; Scenic Resources; and Historic, Cultural and Paleontological Resources (DPW 2024a).

As identified under the Regulatory Setting, the following goals and policies are applicable to energy:

Goal C/NR 12: Sustainable management of renewable and non-renewable energy resources.

- Policy C/NR 12.1: Encourage the production and use of renewable energy resources.
- Policy C/NR 12.2: Encourage the effective management of energy resources, such as ensuring adequate reserves to meet peak demands.
- Policy C/NR12.3: Encourage distributed systems that use existing infrastructure and reduce environmental impacts.

As indicated previously, the Project involves the implementation of a RAP to remediate onsite contamination. While the use of SVE/AS systems to remediate various COCs would consume energy, the Project would assist the County in achieving Goal C/NR 12 by remediating local groundwater supplies, which furthers the County's ability to obtain water from local sources, thereby minimizing energy required to convey water derived from non-local sources. As such, the Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency and less than significant impacts would occur.

Mitigation Measures

Project implementation would not result in significant impacts related to Energy; therefore, no mitigation measures are required.

4.7 GEOLOGY AND SOILS

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	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?	☐	☐	☒	☐
ii) Strong seismic groundshaking?	☐	☐	☒	☐
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
iv) Landslides?	☐	☐	☒	☐
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☒	☐
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☒	☐
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	☐	☐	☐	☒
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☒	☐

Impact Analysis

Would the Project:

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?

Less Than Significant Impact. Ground rupture occurs when movement on a fault break through the surface. Under the 1972 Alquist-Priolo Earthquake Fault Zoning Act, California law requires the State Geologist to identify such faults, establish protective regulatory zones known as "Earthquake Fault Zones" (or prior to 1991, "Special Studies Zones") about the traces of these faults, then publish and disseminate maps of these zones to prevent the construction of residential buildings on top of the traces of active faults. As shown on Figure 5.6-2, Map of Seismic Hazards Los Angeles County, the Project site is located within a

State of California Alquist-Priolo Earthquake Fault Zone (Los Angeles County 2014d). During construction, including partial removal of existing onsite materials, grading, and installation of a concrete or asphalt cover system, on-site personnel may be subject to ground rupture; however, the Project would be required to comply with all applicable State and local regulations governing demolition and construction activities (e.g., excavation, removal of contaminated soil, and provision of a cover system). In addition, the Project implementation would not involve construction of habitable/residential structures or structures whose height, mass, or materials would pose a hazard in the event of an earthquake. The Project would comply with all applicable regulatory requirements and site-specific structural design of the cap in accordance with the geotechnical recommendations to minimize the risk of loss, injury, or death resulting from ground rupture. Therefore, there would be a less than significant impact from ground rupture with compliance with regulations, and no mitigation is required.

ii) Strong seismic groundshaking?

Less than Significant Impact. Strong seismic ground shaking has the potential to occur on the Project area and in the surrounding area due to high rates of seismic activity throughout Southern California. The extent of ground shaking associated with an earthquake depends on the size of the earthquake and the geologic material of the underlying area. As discussed above, the Project is within an earthquake fault zone. However, all areas within the County and Southern California are subject to seismic shaking from local faults.

As previously indicated, the Project would involve short-term activities such as the partial removal of existing on-site materials, grading, and installation of a concrete or asphalt cover system, during which time on-site personnel may be subject to ground rupture; however, the Project would be required to comply with all applicable State and local regulations governing demolition and construction activities (e.g., excavation, removal of contaminated soil, and provision of a cover system). Additionally, the Project implementation would not involve construction of habitable structures or structures whose height, mass, or materials would pose a hazard in the event of an earthquake. With compliance with all applicable regulatory requirements and site-specific structural design of the cap in accordance with the geotechnical recommendations, the risk of loss, injury, or death resulting from strong ground shaking would be minimized. Therefore, there would be a less than significant impact from strong seismic ground shaking, and no mitigation is required.

iii) Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. Liquefaction is a process whereby strong seismic shaking causes unconsolidated, water-saturated sediment to temporarily lose strength and behave as a fluid. This process can lead to near-surface or surface ground failure that can result in extensive damage to or catastrophic failure of buildings, roads, utility lines, and other man-made structures. Liquefaction can manifest as lateral ground spreading or flow, localized sand boils (i.e., eruptions of fluidized sediment), or rapid subsidence and an accompanying loss of bearing strength. Liquefaction is generally known to occur in loose, saturated, relatively clean, fine-grained cohesionless soils at depths shallower than approximately 50 ft.

However, as shown on Figure 5.6-2, Map of Seismic Hazards Los Angeles County, the Project site is not located within a liquefaction zone (Los Angeles County 2014d). Additionally, based on the lack of shallow ground water and soil type (clayey silt/silty clay within the first 15 ft bgs) the potential for liquefaction to impact the site is considered low. Therefore, the Project would not result in a substantial adverse effect, including the risk of loss, injury, or death, due to seismic-induced ground failure, including liquefaction. Therefore, less than significant impacts would occur, and no mitigation is required.

iv) Landslides?

Less Than Significant Impact. The propensity for earthquake-induced landslides is greatest in hilly areas, with steep slopes and bedrock or soils that are prone to mass movement. As shown on Figure 5.6-2, Map of Seismic Hazards Los Angeles County, the Project site is not located within a landslide zone (Los Angeles County 2014d). As the Project site is relatively level with limited gradient changes of the site and surrounding areas, the potential for landslides at the Project site is considered low. Therefore, the Project would not result in a substantial adverse effect, including the risk of loss, injury, or death, due to landslides. Therefore, less than significant impacts would occur, and no mitigation is required.

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

Less than Significant Impact. The Project site is disturbed and developed and has a relatively flat topography. Project implementation will occur through a series of remedial actions including pre-remediation demolition; used oil removal; VOC removal; and provision of cover systems. No soil erosion would occur as the majority of site is paved, and the unpaved area in the back of the site would not be disturbed by the Project. Also, excavation will involve removal of contaminated soil and exporting it off-site for disposal. Even though the potential impacts related to soil erosion or the loss of topsoil would be less than significant, the Project would be required to prepare a Stormwater Pollution Prevention Plan (SWPPP) after initiating remediation. Therefore, the impacts would be a less than significant impact, and no mitigation is required.

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?

Less than Significant Impact. As discussed above, the Project site is not located in a potential liquefaction zone and the potential for landslides at the site is considered low. Additionally, the Project would not introduce any new topographical features or elements that would change the existing geologic setting of the Project area, as the majority of the area is paved. As such, on-site geologic and soils issues such as on-site soil stability including landslides, lateral spreading, subsidence, liquefaction, and collapse are not significant due to the nature of the site. Therefore, implementation of the proposed Project would not result in impacts associated with unstable geologic conditions. Therefore, impacts would be less than significant. No mitigation is required.

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?

Less than Significant Impact. Expansive soils are characterized by their ability to undergo significant volume changes (shrink or swell) due to variations in moisture content. Expansive soils contain significant amounts of clay particles that swell considerably when wet and shrink when dried. Based on the 2021 updated RAP, the first 15 ft bgs within the Coastal Plain of Los Angeles consists of clayey silt/silty clay with minor thin sand interbeds. As stated in the General Plan 2025 Draft EIR, in most areas within the County, expansive soil is not of concern. However, projects within the County are required to adhere to existing building code and grading requirements. The Project would comply with all applicable regulatory requirements and site-specific structural design of the cap in accordance with the geotechnical recommendations to minimize the risk of expansive soils. In addition, the Project would not involve construction of residential or habitable structures and would not create substantial direct or indirect risks to life or property. Therefore, Project impacts related to expansive soils would be less than significant, and no mitigation is required.

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?

No Impact. The use of septic tanks or alternative wastewater disposal systems is not proposed by the Project. Therefore, no impact would result, and no mitigation is required.

f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Less than Significant Impact. The following analysis is based on the results of a geologic map and records check conducted through the Natural History Museum (NHM) of Los Angeles County. The paleontological records search was completed on November 13, 2024.

The Project site is within the Coastal Plain of Los Angeles Basin, which is characterized by Quaternary period sediment deposits from Holocene (10,000 years ago to the present) to Pleistocene (between 2.5 million years to 10,000 years ago) ages. According to the USGS 7.5-Minute Venice and Inglewood quadrangles Geologic map, the Project site is underlain by both young Holocene and older Pleistocene surficial sediments. Young Holocene alluvial deposits are comprised of unconsolidated and undissected alluvial sediments, which exhibit gravel, sand, and clay derived mostly from the Santa Monica mountains. Older Pleistocene surficial sediments consist of alluvial gravel, sand, and clay deposits.

The NHM paleontological record search involved a thorough search of the NHM paleontology collections for the locality and taxa (populations of an organism or organisms) for the area surrounding the Project site. While the record search did not identify any fossil localities within the Project site, six fossil localities were discovered nearby in soils that may lie beneath the Project site.

As indicated above, the Project site is generally underlain by Quaternary-aged young Holocene and older Pleistocene surficial soils, which may exhibit known and unknown extinct species. While there is always a possibility for an unanticipated discovery of significant scientific resources (i.e., fossils) if ground disturbing activities from a project occur within undisturbed native soils, the proposed remediation would not involve grading and construction activities. Soil excavation activities at the Skim Pond on the LOC Site and underground pipelines removal on the MLOC Site, with the purpose of removing contaminated soil, is not expected to extend into the undisturbed native soi. However, it is noted that implementation of the proposed Project may include borings in areas not previously disturbed or into native soil. Thus, even though the records search did not identify any fossil localities within the Project site, if boring or soil excavation activities encounter unknown paleontological resources, a qualified Paleontologist will be retained to examine the find, as part of the Project (Project Design Feature [PDF]). The potential impacts would be less than significant with the PDF, and no mitigation is required.

Therefore, the Project's potential impact pertaining to direct or indirect destruction of a unique paleontological or geologic feature would be less than significant with the PDF, and no mitigation is required.

Mitigation Measures

Project implementation would not result in significant impacts related to Geology and Soils; therefore, no mitigation measures are required.

4.8 GREENHOUSE GAS EMISSIONS

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

Introduction

This section discusses the existing GHG emissions setting and the Project's potential impacts related to GHG emissions. GHG emissions were calculated for the Project by using CalEEMod version 2022.1.1.0 (CAPCOA 2022). CalEEMod is a computer program accepted by the SCAQMD that can be used to estimate criteria pollutant and GHG emissions associated with land development projects in California. CalEEMod has separate databases for specific counties and air districts. The Los Angeles County database was used for the Project. For this analysis, the results are expressed in metric tons of carbon dioxide equivalent per year ($MTCO_2e/yr$).

Existing Setting

Climate change refers to any significant change in measures of climate (e.g., average temperature, precipitation, or wind patterns) over a period of time. Climate change may result from natural factors, natural processes, and human activities that change the composition of the atmosphere and alter the surface and features of the land. Significant changes in global climate patterns have recently been associated with global warming, which is an average increase in the temperature of the atmosphere near the Earth's surface; this is attributed to an accumulation of GHG emissions in the atmosphere. GHGs trap heat in the atmosphere which, in turn, increases the Earth's surface temperature. Some GHGs occur naturally and are emitted to the atmosphere through natural processes, while others are created and emitted solely through human activities. The emissions of GHGs through fossil fuel combustion along with other human activities are associated with global warming.

GHGs, as defined under California's Assembly Bill (AB) 32, include carbon dioxide (CO_2), methane, nitrous oxide, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride. General discussions on climate change often include water vapor, atmospheric ozone, and aerosols in the GHG category. Water vapor and atmospheric ozone are not gases that are formed directly in the construction or operation of development projects, nor can they be controlled in these projects. Aerosols are not gases. While these elements have a role in climate change, they are not considered by either regulatory bodies, such as CARB, or climate change groups, such as the California Climate Action Registry, as gases to be reported or analyzed for control. Therefore, no further discussion of water vapor, atmospheric ozone, or aerosols is provided.

Regulatory Background

On June 1, 2005, Governor Arnold Schwarzenegger signed Executive Order (EO) S-3-05, which calls for a reduction in GHG emissions to the year 2000 level by 2010, to year 1990 levels by 2020, and to 80 percent below 1990 levels by 2050.

The principal overall State plan and policy adopted for the purpose of reducing GHG emissions is AB 32 (California Global Warming Solutions Act of 2006). AB 32 establishes regulatory, reporting, and market mechanisms to achieve quantifiable reductions in GHG emissions and establishes a cap on statewide GHG emissions. AB 32 recognizes that California is the source of substantial amounts of GHG emissions. The statute states the following:

> Global warming poses a serious threat to the economic well-being, public health, natural resources, and the environment of California. The potential adverse impacts of global warming include the exacerbation of air quality problems, a reduction in the quality and supply of water to the state from the Sierra snowpack, a rise in sea levels resulting in the displacement of thousands of coastal businesses and residences, damage to marine ecosystems and the natural environment, and an increase in the incidences of infectious diseases, asthma, and other human health-related problems.

In order to avert these consequences, AB 32 establishes a State goal of reducing GHG emissions to 1990 levels by the year 2020, codifying the goal of EO S-3-05.

CARB approved a Climate Change Scoping Plan as required by AB 32 in 2008; this plan is required to be updated every five years. The Climate Change Scoping Plan proposes a "comprehensive set of actions designed to reduce overall carbon GHG emissions in California, improve our environment, reduce our dependence on oil, diversify our energy sources, save energy, create new jobs, and enhance public health" (CARB 2008). The Climate Change Scoping Plan has a range of GHG-reduction actions which include direct regulations, alternative compliance mechanisms, monetary and non-monetary incentives, voluntary actions, market-based mechanisms such as a cap-and-trade system, and an AB 32 implementation regulation to fund the program. On February 10, 2014, CARB released the Draft Proposed First Update to the Climate Change Scoping Plan (CARB 2014). The board approved the final First Update to the Climate Change Scoping Plan on May 22, 2014. The first update describes California's progress towards AB 32 goals, stating that "California is on track to meet the near-term 2020 greenhouse gas limit and is well positioned to maintain and continue reductions beyond 2020 as required by AB 32" (CARB 2014). The 2017 Scoping Plan Update incorporates the 40 percent reduction to 1990 emissions levels by 2030. The 2022 Scoping Plan assesses progress towards achieving carbon neutrality by 2045 or earlier through the reduction of emissions by 85 percent below 1990 levels (CARB 2022b).

The Sustainable Communities and Climate Protection Act of 2008, Senate Bill (SB) 375, established a process to coordinate land use planning, regional transportation plans, and funding priorities in order to help California meet the GHG reduction goals established in AB 32. SB 375 required the SCAG to incorporate the SCS into its RTPs that will achieve GHG

emission reduction targets though several measures, including land use decisions. SCAG's SCS is included in the SCAG 2024-2050 RTP/SCS (SCAG 2024). The goals and policies of the RTP/SCS that reduce VMT focus on transportation and land use planning that include building infill projects; locating residents closer to where they work and play; and designing communities so there is access to high quality transit service.

On April 29, 2015, Governor Brown signed EO B-30-15, which ordered an interim statewide GHG emission reduction target to reduce GHG emissions to 40 percent below 1990 levels by 2030 to ensure California meets its target of reducing GHG emissions to 80 percent below 1990 levels by 2050. Five key goals for reducing GHG emissions through 2030 include (1) increasing renewable electricity to 50 percent; (2) doubling the energy efficiency savings achieved in existing buildings and making heating fuels cleaner; (3) reducing petroleum use in cars and trucks by up to 50 percent; (4) reducing emissions of short-lived climate pollutants; and (5) managing farms, rangelands, forests, and wetlands to increasingly store carbon. EO B-30-15 also directs CARB to update the Climate Change Scoping Plan to express the 2030 target in terms of million metric tons of carbon dioxide equivalent.

On September 8, 2016, the Governor signed Senate Bill 32 (SB 32) to codify the GHG reduction goals of EO B-30-15, requiring the State to reduce GHG emissions by 40 percent below 1990 levels by 2030 (Health and Safety Code Section 38566). As stated above, this goal is expected to keep the State on track to meet the goal set by EO S-3-05 of reducing GHG emissions by 80 percent below 1990 levels by 2050.

AB 197 was signed at the same time to ensure that the SB 32 goals are met by requiring CARB to provide annual reports of GHGs, criteria pollutants, and TACs by facility, City and sub-county level, and sector for stationary sources and at the County level for mobile sources. It also requires the CARB to prioritize specified emission reduction rules and regulations and to identify specified information for emission reduction measures (e.g., alternative compliance mechanism, market-based compliance mechanism, and potential monetary and nonmonetary incentive) when updating the Scoping Plan.

SB 350, signed October 7, 2015, is the Clean Energy and Pollution Reduction Act of 2015. SB 350 is the implementation of some of the goals of EO B-30-15. The objectives of SB 350 are as follows:

3. To increase from 33 percent to 50 percent, the procurement of our electricity from renewable sources
4. To double the energy efficiency savings in electricity and natural gas final end uses of retail customers through energy efficiency and conservation

The text of SB 350 sets a December 31, 2030, target for 50 percent of electricity to be generated from renewable sources. SB 350 also requires the State to double statewide energy efficiency savings in electricity and natural gas end uses by 2030. Additionally, SB 350 sets requirements for large utilities to develop and submit integrated resources plans, which detail how utilities would meet their customers' resource needs, reduce GHG emissions, and integrate clean energy resources (CEC 2023a).

On September 10, 2018, Governor Brown signed SB 100, the 100 Percent Clean Energy Act of 2018. SB 100 requires renewable energy and zero-carbon resources to supply 100 percent of electric retail sales to end-use customers and 100 percent of electricity procured to serve state agencies by December 31, 2045. This policy requires the transition to zero-carbon electric systems that do not cause contributions to increase of GHG emissions elsewhere in the western electricity grid (CEC 2023b). SB 100 also creates new standards for the Renewable Portfolio Standard goals established by SB 350 in 2015. Specifically, the bill increases required energy from renewable sources for both investor-owned utilities and publicly owned utilities from 50 percent to 60 percent by 2030.

Further, on September 10, 2018, Governor Brown also signed California EO B-55-18, which sets a new statewide goal of carbon neutrality as soon as possible, and no later than 2045 and achieve net negative emissions thereafter. EO B-55-18 was added to the existing Statewide targets of reducing GHG emissions, including the targets previously established by Governor Brown of reducing emissions to 40 percent below 1990 levels by 2030 (EO B-30-15 and SB 32), and by Governor Schwarzenegger of reducing emissions to 80 percent below 1990 levels by 2040 (EO S-3-05).

At a local level, the County has adopted OurCounty, the Los Angeles Countywide Sustainability Plan (County of Los Angeles 2019). OurCounty is identifies 12 goals that outline the vision for a sustainable Los Angeles County. The plan identifies lead County entities and partners who will work to bring the 12 goals to fruition, implementing related strategies and actions identified in the document (Los Angeles County 2019).

Thresholds of Significance

The CEQA Amendments for Greenhouse Gas Emissions state in Section 15064.4(a) that lead agencies should "make a good faith effort, to the extent possible on scientific and factual data, to describe, calculate or estimate" GHG emissions. The CEQA Amendments note that an agency may identify emissions by either selecting a "model or methodology" to quantify the emissions or by relying on "qualitative analysis or other performance-based standards" (CNRA 2009b). Section 15064.4(b) of the CEQA Guidelines provides that the lead agency should consider the following when assessing the significance of impacts from GHG emissions on the environment (CNRA 2009b):

- The extent a project may increase or reduce GHG emissions as compared to the environmental setting;
- Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project; and
- The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions.

All of these are considered in the impact analysis presented in this section. Appendix G, Environmental Checklist Form, of the CEQA Guidelines does not prescribe specific significance thresholds for GHG. Rather, Appendix G of the CEQA Guidelines asks whether

the project would conflict with a plan, policy, or regulation adopted to reduce GHG emissions or would generate GHG emissions that would significantly affect the environment, indicating that the determination of what is a significant effect on the environment should be left to the lead agency. Accordingly, CEQA does not prescribe specific methodologies for performing an assessment; they do not establish specific thresholds of significance; and they do not mandate specific mitigation measures. Rather, CEQA emphasizes the lead agency's discretion to determine the appropriate methodologies and thresholds of significance consistent with the manner in which other impact areas are handled in CEQA (CNRA 2009b).

Lead agencies should consider all feasible means, supported by substantial evidence and subject to monitoring and reporting, of mitigating the significant effects of GHG emissions. As pertinent to a project, these potential mitigation measures, set forth in Section 15126.4(c) of the CEQA Guidelines, may include (1) measures in an existing plan or mitigation program for the reduction of GHG emissions that are required as part of the lead agency's decision; (2) reductions in GHG emissions resulting from a project through implementation of project design features; (3) off-site measures, including offsets, to mitigate a project's emissions; and (4) carbon sequestration measures (CNRA 2009b).

According to Appendix G of the State CEQA Guidelines, a proposed project will normally have a significant adverse environmental impact related to GHG emissions if it will:

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

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

CEQA Section 21068 defines a "significant effect on the environment" as a substantial, or potentially substantial, adverse change in the environment. With respect to global climate change, no one project can individually create a direct impact on what is a global problem (i.e., no project will, by itself, raise the temperature of the planet).

However, the emissions generated by a project may be "cumulatively considerable", meaning "that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects" (State CEQA Guidelines, Section 15065[a][3]). Section 15064(h)(3) of the State CEQA Guidelines adds that a lead agency may determine that a project's incremental contribution to a cumulative effect is not cumulatively considerable if the Project will comply with the requirements in a previously approved plan or mitigation program (including, but not limited to, water quality control plan, air quality attainment or maintenance plan, integrated waste management plan, habitat conservation plan, natural community conservation plan, plans or regulations for the reduction of greenhouse gas emissions) that provides specific requirements that will avoid or substantially lessen the cumulative problem within the geographic area in which the Project is located.

Generally, the evaluation of an impact under CEQA requires measuring data from a proposed project against a "threshold of significance" (State CEQA Guidelines, Section 15064.7).

Furthermore, "when adopting thresholds of significance, a lead agency may consider thresholds of significance previously adopted or recommended by other public agencies or recommended by experts, provided the decision of the lead agency to adopt such thresholds is supported by substantial evidence" (State CEQA Guidelines, Section 15064.7[c]). For GHG emissions and global warming, there is not, at this time, one established, universally agreed-upon threshold of significance by which to measure an impact, and the County has not adopted a local threshold of significance for GHG emissions. In considering GHG emission reductions, the goal is not to reduce emissions to less than a specific threshold on a project-by-project basis. This policy would be a disincentive to the creation of large projects that can achieve emissions reductions in greater quantities and more efficiently than small projects. Rather, the goal for GHG emission reductions on the plan and project level is to make a substantial contribution to the larger statewide and regional emissions reductions goals that have been and are being developed. As such, the project was analyzed to determine if it would substantially contribute to the larger Statewide and regional GHG reductions goals that have been established.

For the Project, for Threshold 4.7(a), existing and proposed GHG emissions were calculated by using CalEEMod version 2022.1.1.0 (CAPCOA 2022). CalEEMod is a computer program accepted by the SCAQMD that can be used to estimate criteria pollutant and GHG emissions associated with land development projects in California. CalEEMod has separate databases for specific counties and air districts. The Los Angeles County database was used for the Project. The model calculates emissions of carbon monoxide (CO); sulfur dioxide (SO_2); respirable particulate matter less than 10 micrometers in diameter (PM10); fine particulate matter less than 2.5 micrometers in diameter (PM2.5); the O_3 precursors volatile organic compounds (VOC) and oxides of nitrogen (NOx); and the GHG emissions of Bio-CO_2, NBio-CO_2, Total CO_2, CH_4, N_2O, and CO_2e. For this analysis, the results are expressed in $MTCO_2e$/yr. See Section 4.3, Air Quality, of the IS/ND, for discussion of the CalEEMod inputs, adjustments, outputs, and other characteristics for construction-related and operational emissions. The CalEEMod results were then compared to the Tier 3 GHG thresholds developed and used by SCAQMD, which the County had determined are appropriate based on substantial evidence to use for purposes of determining the significance of the Project's GHG impacts.

Beginning in April 2008, the SCAQMD convened a Working Group to provide guidance to local lead agencies on determining significance for GHG emissions in their CEQA documents. The Working Group was scheduled to meet once per month. On December 5, 2008, the SCAQMD Governing Board adopted its staff proposal for an interim CEQA GHG significance threshold of 10,000 $MTCO_2e$ per year ($MTCO_2e$/yr)[1] for industrial projects where the SCAQMD is the lead agency. In September 2010, the Working Group presented a revised tiered approach to determining GHG significance for residential and commercial projects (SCAQMD 2010). These proposals have not yet been considered by the SCAQMD Board.

At Tier 1, GHG emissions impacts would be less than significant if the proposed Project qualifies under a categorical or statutory CEQA exemption. At Tier 2, for projects that do not meet the Tier 1 criteria, the GHG emissions impact would be less than significant if the

[1] GHG emissions are commonly expressed as $MTCO_2e$. Larger quantities of emissions, such as on the world or State scale, are expressed in $MMTCO_2e$.

proposed Project is consistent with a previously adopted GHG reduction plan that meets specific requirements.[2] At Tier 3, the Working Group proposes extending the 10,000 $MTCO_2e$/yr screening threshold currently applicable to industrial projects where the SCAQMD is the lead agency, described above, to other lead agency industrial projects. For residential and commercial projects (that is, non-industrial projects), the Working Group proposes the following Tier 3 screening values: either (1) a single 3,000 $MTCO_2e$/yr threshold for all land use types or (2) separate thresholds of 3,500 $MTCO_2e$/yr for residential projects, 1,400 $MTCO_2e$/yr for commercial projects, and 3,000 $MTCO_2e$/yr for mixed-use projects. These screening values were developed from a survey of CEQA projects. It is estimated that projects with emissions above these values would produce 90 percent of the anticipated GHG emissions from residential/commercial projects and projects below the screening level would contribute 10 percent or less of the regional GHG emissions from land development. Therefore, a project with emissions less than the applicable screening value would be considered to have less than significant GHG emissions. Projects with emissions greater than the Tier 3 screening values would be analyzed at Tier 4 by one of three methods:

1. **A Percent Emission Reduction Target.** This method is used by the Sacramento Metropolitan and San Joaquin Valley Air Districts and the City of San Diego. The SCAQMD Working Group made no recommendation relative to this method.
2. **Early Implementation of Applicable AB 32 Scoping Plan Measures.** The Working Group assumes implementation of AB 32 measures would be incorporated in method 3 below.
3. **Efficiency Targets.** On the project level, 2020 GHG emissions should not exceed 4.8 $MTCO_2e$/year per service population (SP) where SP is project residents plus employees. Further, 2035 GHG emissions should not exceed 3.0 $MTCO_2e$/year per SP (SCAQMD 2010).

Projects with GHG emissions not meeting the Tier 4 targets would be required to provide mitigation in the form of real, quantifiable, and verifiable offsets to achieve the target thresholds. The offsets may be achieved through project design features, other on-site methods, or by off-site actions, such as energy efficiency upgrade of existing buildings.

In summary, to date, the SCAQMD Board has adopted an interim CEQA significance threshold for GHGs for industrial projects where the SCAQMD is the lead agency and continues to consider screening levels under CEQA for residential, commercial, and mixed-use projects. This proposed screening and mitigation proposal from SCAQMD remains a work in progress; the Working Group has not convened since the fall of 2010. The proposal has not been considered or approved for use by the SCAQMD Board. However, the SCAQMD Tier 3

[2] The plan must (a) quantify GHG emissions, both existing and projected over a specified time period, resulting from activities within a defined geographic area; (b) establish a level, based on substantial evidence, below which the contribution to GHG emissions from activities covered by the plan would not be cumulatively considerable; (c) identify and analyze the GHG emissions resulting from specific actions or categories of actions anticipated within the geographic area; (d) specify measures or a group of measures, including performance standards, that substantial evidence demonstrates, if implemented on a project-by-project basis, would collectively achieve the specified emissions level; (e) establish a mechanism to monitor the plan's progress toward achieving the level and to require amendment if the plan is not achieving specified levels; and (f) be adopted in a public process following environmental review (State CEQA Guidelines, Section 15183.5).

thresholds are widely used throughout the SoCAB, and because they are designed to capture 90 percent of the anticipated GHG emissions from residential/commercial projects and projects, the County has determined to apply this threshold to the Project for determining the significance of its GHG impacts.

For Threshold 4.7(b), to assess whether the Project would conflict with a plan or policy adopted for the purpose of reducing GHGs, this analysis examines whether the Project would conflict with CARB's 2022 Scoping Plan, SCAG's Connect SoCal 2024-2050, and the County's General Plan.

Impact Analysis

Would the Project:

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

Less than Significant Impact. GHG emissions resulting from Project construction were estimated using CalEEMod, which is designed to model construction and operational emissions for land development projects and allows for the input of project- and County-specific information. For modeling purposes, construction activities were based on the Project's construction assumptions and default assumptions derived from CalEEMod.

The estimated construction GHG emissions for the proposed Project would be 327.4 $MTCO_2e$, as shown in Table 13, Estimated Greenhouse Gas Emissions from Construction.

TABLE 13
ESTIMATED GREENHOUSE GAS
EMISSIONS FROM CONSTRUCTION

Year	Emissions ($MTCO_2e$)
2025	253
2026	53
Total	**306**

$MTCO_2e$: metric tons of carbon dioxide equivalent

Notes:

- Totals may not add due to rounding variances.
- Detailed calculations in Appendix C.

Operational phase GHG emissions would come primarily from vehicular trips associated with ongoing maintenance and from the consumption of electricity to power the SVE and air sparging systems. While the Project's operation would result in GHG emissions, the Project would remediate various COCs present in the underlying groundwater, reduce the contaminant threat to drinking water aquifers, and reduce the reliance on imported water. While trips to the Project site would be less frequent, operational emissions have been conservatively quantified by modeling (1) 2 one-way trips per day for maintenance and testing purposes and (2) energy (electricity) consumption from the SVE and air sparging

systems. The estimated operations GHG emissions for the proposed Project is shown in Table 14, below.

TABLE 14
ESTIMATED GREENHOUSE GAS EMISSIONS
FROM PROJECT OPERATIONS

Source	Emissions ($MTCO_2e/yr^a$)
Mobile	2
Energy	19
Total	**21**

$MTCO_2e$/yr: metric tons of carbon dioxide equivalent per year; SCAQMD: South Coast Air Quality Management District.

Because impacts from construction activities occur over a relatively short period of time, they contribute a relatively small portion of the overall lifetime Project GHG emissions. In addition, GHG emission reduction measures for construction equipment are relatively limited. The SCAQMD recommends that construction emissions be amortized over a 30-year project lifetime so that GHG reduction measures address construction GHG emissions as part of the operational GHG reduction strategies (SCAQMD 2008). Therefore, construction and operational emissions are combined by amortizing the construction and operations over an assumed 30-year Project lifetime. This combination is shown in Table 15, Estimated Total Project Annual Greenhouse Gas Emissions, using the proposed Project's amortized construction and operational emissions.

TABLE 15
ESTIMATED TOTAL PROJECT ANNUAL
GREENHOUSE GAS EMISSIONS

Source	Emissions ($MTCO_2e/yr^a$)
Construction (Amortized)	10
Operations	21
Total[b]	**32**
SCAQMD Threshold	**10,000**
Exceeds Threshold?	**No**

$MTCO_2e$/yr: metric tons of carbon dioxide equivalent per year; SCAQMD: South Coast Air Quality Management District.

[a] Total derived by dividing construction emissions (see Table 11) by 30.
[b] Total annual emissions are the sum of amortized construction emissions and operational emissions.

The SCAQMD has adopted a threshold of 10,000 $MTCO_2e$ per year for industrial land use projects. As shown, the estimated GHG emissions from the Proposed Project would be less than this suggested threshold. The impact would be less than significant, and no mitigation is required.

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

Less than Significant Impact. As discussed above, the principal State plan and policy adopted for the purpose of reducing GHG emissions is AB 32, whose quantitative goal is to reduce GHG emissions to 1990 levels by 2020. This goal is further supplemented by SB 32, which established a reduction target of at least 40 percent below 1990 emissions by 2030, and by EO B-30-15 and EO S-3-05, which set an 80 percent reduction below 1990 emissions by 2050.

The purpose of the RAP is to remediate the Project site; thus, the intent of the Project is to minimize existing emissions at the Project site. Therefore, although implementation of the RAP would result in a slight, temporary increase in GHG emissions in the short-term, overall, the Project would be considered consistent with the general goals of AB 32 in that it aims to reduce overall emissions generated by the Site.

At a regional level, SCAG has adopted Connect SoCal, the 2024–2050 Regional Transportation Plan/Sustainable Communities Strategy. Rooted in the 2008 and 2012 RTP/SCS plans, Connect SoCal's "Core Vision" centers on maintaining and better managing the existing transportation network while expanding mobility choices. The proposed Project is neither a housing development project nor a transportation project that would increase population within the State or increase vehicle miles travelled (VMT). As discussed under Threshold 4.7a, the Project would also not result in substantial amounts of GHG emissions from either the implementation phase or the operations phase.

Although the Project would generate vehicle trips and VMT, the number of trips associated with maintenance activities during the Project's operation would be minimal and is not expected to last more than 14 years. As shown in Table 4.7-4, the Project would result in emissions which are below the SCAQMD's draft interim significance threshold for GHGs. As such, GHG emissions generated by the Project are not considered to be substantial.

Moreover, the Project would not conflict with the goals outlined in ConnectSocal, which are to build and maintain an integrated multimodal transportation network; develop, connect and sustain communities that are livable and thriving; create a healthy region for the people of today and tomorrow; and support a sustainable, efficient and productive regional economic environment that provides opportunities for all residents. A less than significant impact would occur.

At a local level, the County has adopted the OurCounty Climate Action Plan (CAP). OurCounty is a regional sustainability plan for Los Angeles County (County of Los Angeles 2019). OurCounty identifies 12 goals, 10 of which are relevant to the Project; Project consistency with the 10 relevant goals is detailed below.

Goal	Would the Project Conflict?
Goal 1: Resilient and healthy community environments where residents thrive in place	**Project would not conflict.** The Project would remediate the existing contamination at the Project site, resulting in reduced emissions and associated health benefits. As such, the Project would be consistent with this goal.
Goal 2: Buildings and infrastructure that support human health and resilience	**Project would not conflict.** While the Project does not involve the construction of buildings, the Project would remediate the existing contamination at the Project site, resulting in reduced emissions and associated health benefits. As such, the Project would be not conflict with this goal.
Goal 3: Equitable and sustainable land use and development without displacement	**Project would not conflict.** The Project would remediate existing contamination and would not result in the displacement of any residents. As such, the Project would not conflict with this goal.
Goal 4: A prosperous LA County that provides opportunities for all residents and businesses and supports the transition to a green economy	**Project would not conflict.** The Project would remediate existing contamination, allowing for future development and use of the Project site. As such, the Project would not conflict with this goal.
Goal 5: Thriving ecosystems, habitats, and biodiversity	**Project would not conflict.** As discussed in Section 4.4, Biological Resources, the Project would result in less than significant impacts to biological resources. As such, the Project would not conflict with this goal.
Goal 6: Accessible parks, beaches, recreational waters, public lands, and public spaces that create opportunities for respite, recreation, ecological discovery, and cultural activities	**Project would not conflict.** As discussed in Section 4.16, Recreation, the Project would result in less than significant impacts to recreational resources. As such, the Project would not conflict with this goal.
Goal 7: A fossil fuel-free LA County	**Project would not conflict.** The Project's SVE and air sparging systems would utilize electricity rather than diesel fuel. As such, the Project would not conflict with this goal.
Goal 8: A convenient, safe, clean, and affordable transportation system that enhances mobility and quality of life while reducing car dependency	**Project would not conflict.** As discussed in Section 4.17, Transportation, the Project would result in less than significant impacts to transportation. As such, the Project would not conflict with this goal.
Goal 9: Sustainable production and consumption of resources	**Project would not conflict.** As discussed in Section 4.6, Energy, the Project would consume a nominal amount of energy during implementation of the RAP and operation of the SVE and air sparging systems. As such, the Project would not conflict with this goal.
Goal 10: A sustainable and just food system that enhances access to affordable, local, and healthy food	**Project would not conflict.** The Project does not involve any elements that would impact the County's food system. As such, the Project would not conflict with this goal.

As shown above, the Project does not conflict with the OurCounty Plan; therefore, the Project would have less than significant impacts regarding conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions, and no mitigation measures are required.

Mitigation Measures

Project implementation would not result in significant impacts related to GHG emissions; therefore, no mitigation measures are required.

4.9 HAZARDS AND HAZARDOUS MATERIALS

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

Impact Analysis

Would the Project:

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

Less than Significant Impact. The Project would involve short-term activities such as demolition (i.e., existing aboveground storage tanks and process equipment on the LOC Site and underground sumps, trenches, and pipelines associated with former operations at the MLOC and LOC Sites), excavation, and removal of contaminated soil and VOC and export for disposal off-site. During excavation activities and transport of contaminated soil, the soil would be covered to avoid release into the air. Additionally, upon demolition of the underground sumps, trenches, and pipelines, the materials will be separated into recyclables and non-recyclables and subsequently disposed at appropriate off-site permitted facilities.

Project operations would involve the operation of one SVE system and one air sparging system, located at the LOC site; surface piping would be connected to these systems and fed into the ground at various locations throughout the Project site.

The Project would be required to comply with SCAQMD Rule 1166, VOC Emissions From Decontamination of Soil (RR-1). Rule 1166 requires an approved mitigation plan be obtained from SCAQMD prior to commencing the excavation or grading of soil containing VOCs. Rule 1166 requires effective strategies for maintaining VOC levels within regulatory limits, such as segregating VOC-contaminated stockpiles from non-VOC-contaminated stockpiles such that mixing of the stockpiles does not take place; spraying VOC-contaminated soil stockpiles with water and/or approved vapor suppressant and covering them with plastic sheeting for all periods of inactivity lasting more than one hour; and conducting a daily visual inspection of all covered VOC-contaminated soil stockpiles to ensure the integrity of the plastic-covered surfaces, and keeping a daily inspection record. Additionally, in compliance with Rule 1166, all contaminated soil would be safely exported off-site to approved treatment facilities. The Project would either export contaminated soil to Soil Safe located in Adelanto, California or the US Ecology Facility located in Beatty, Nevada. All necessary SCAQMD permits would be obtained prior to pilot testing and full-scale operation of the SVE and air sparging systems. Implementation of regulatory requirements prior to and during Project implementation would minimize the potential for significant hazard to the public or environment.

Once implementation of the RAP has been completed, the remaining on-site materials would be contained under the asphalt/concrete cover system. The objective of the cover system is to prevent contact with soil containing metals and other non-VOCs and to minimize hazardous compounds to protect human health and the environment. Similarly, the objective of the Project is to remediate the previous contaminations on the MLOC and LOC sites to protect human health and the environment, maintain protection over time, and minimize untreated waste. As such, the Project would not create a significant hazard to the public or environment. Impacts would be less than significant, and no mitigation is required.

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?

Less than Significant Impact. The purpose of the Project is remediation of existing contaminated sites to meet the remedial action and cleanup goals protective of human health and the environment, maintaining protection over time, and minimizing untreated waste. As previously stated, during construction activities and export of contaminated soil off-site, the Project would be required to comply with all applicable regulations, including SCAQMD Rule 403 and 1166 to ensure that hazardous materials are not released into the environment during demolition, excavation, and removal of contaminated soil. Once implementation of the RAP has been completed, the remaining on-site materials would be contained under the asphalt/concrete cover system, to prevent contact with soil containing metals and other non-VOCs. Therefore, with implementation of remediation activities, an accidental release of hazardous materials in the long run is unlikely.

Thus, the Project would not create a significant hazard to the public involving the release of hazardous materials into the environment. As such, there would be a less than significant impact, and no mitigation is required.

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

Less than Significant Impact. St. Albert the Great Middle School is located 250 ft east of the Project site, Wonderland Angeles Pre-School is located approximately 500 ft south of the Project site, and Enterprise Middle School is located approximately 0.25 mile southeast of the Project site. As stated above in Threshold 4.9(a), during construction and export of contaminated soil off-site, a potential exists for the accidental release or spill of hazardous substances. As such, the Project would be required to comply with all applicable regulations, including SCAQMD Rule 403 and 1166 to ensure that hazardous materials are not released into the environment. In addition, the General Permit requires preparation of a Project-specific SWPPP after remediation is initiated, which describes practices to reduce pollutants in stormwater discharges by implementing best management practices (BMPs). The BMPs would minimize soil contamination outside the Project limits during excavation and soil transport. Once implementation of the RAP has been completed, the remaining on-site materials would be contained under the asphalt/concrete cover system, similar to the existing condition. Therefore, the accidental release of hazardous materials would be minimal, and the Project would not likely emit hazardous materials within one-quarter mile of a school. As such, there would be a less than significant impact, and no mitigation is required.

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?

Less than Significant Impact. The Project site is on the list compiled to Government Code Section 6562.5, commonly referred to as the "Cortese List." The Project is designed to remediate the contamination and protect the public and the environment from hazards and hazardous materials. As discussed above, while the Project may result in short-term exposure to emissions, with compliance with regulatory requirements the impacts would be less than significant. During operations, the Project would include an asphalt or concrete cover system, similar to the existing condition, to contain potentially hazardous materials after implementation of the RAP. As such, the Project would not create a significant hazard to the public or environment. There would be a less than significant impact, and no mitigation is required.

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?

No Impact. The Project site is located approximately 0.80 mile northwest of Compton/Woodley Airport. However, the Project site is not within the Airport's 65 CNEL

noise contour boundaries or the Runway Protection Zone (RPZ). The Project would not expose people working within the Project site to excessive noise levels and safety hazards. As a result, no impacts would occur, and no mitigation is required.

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

Less than Significant Impact. The Project site is located 1.2 miles east of the I-110, 1.5 miles north of the SR-91, 1 mile east of Figueroa Street, and directly adjacent to Avalon Boulevard. According to the General Plan Figure 12.6, Disaster Routes Map, the I-110 and SR-91 are considered Freeway Disaster Routes, and Avalon Boulevard and Figuroa Street are considered Highway Disaster Routes (Los Angeles County 2014e).

It is anticipated that construction staging areas during implementation of the RAP would occur onsite, and no street or lane closures such that would interfere with adopted emergency response or emergency evaluation plans would result.

Operationally, the Project would not impact the emergency evacuation of adjacent land uses as remediation of the site in the long-term would rely on monitored natural attenuation (MNA), which will occur after active remediation by SVE and air sparging. MNA specifically refers to reliance on natural processes to finish site cleanup. Under favorable conditions, natural processes such as biodegradation, dispersion, dilution, sorption, and volatilization act without human intervention to reduce the mass, toxicity, mobility, volume, or concentration of contaminants in soil or groundwater.

Therefore, implementation of the RAP, during construction or operations, would not interfere with an adopted emergency plan. The Project would have less than significant impacts, and no mitigation is required.

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

No Impact. The Project site is located in a highly urbanized area of the County and is not designated as a Fire Hazard Severity Zone within a State responsibility area or designated as a Very High Fire Hazard Severity Zone (VHFHSZ) within a local responsibility area, as defined by the California Department of Forestry and Fire Prevention (CAL FIRE) (CAL FIRE 2023). Rather, the site is within a non-VHFHSZ area. In addition, there are no large, undeveloped areas and/or steep slopes on or near the site that may pose wildfire hazards. The Project would be required to adhere to construction provisions as provided in the County Code of Ordinances, the CBC and California Fire Code. Implementation of the RAP would not expose people or structures directly or indirectly to a significant risk of loss or death associated with wildland fires. No impact would occur, and no mitigation is required.

Mitigation Measures

Project implementation would not result in significant impacts related to Hazards and Hazardous Materials; therefore, no mitigation measures are required.

4.10 HYDROLOGY AND WATER QUALITY

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

Impact Analysis

Would the Project:

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

Less than Significant Impact. Implementation of the RAP would require short-term construction activities such as the pre-remediation demolition; excavation of contaminated soil; SVE and air sparging system installation; and installation of a concrete or asphalt cover system. Therefore, the Project has the potential to result in short-term construction impacts to surface water quality. Stormwater runoff from the construction site may contain loose soils, organic matter, sediments, and spills or leaks from heavy equipment and machinery, such as fuel, oil, and grease and heavy metals.

The Clean Water Act (CWA) and the Porter-Cologne Water Quality Control Act establish the framework for regulating pollutant discharges from construction activities to waters of the United States, through the National Pollutant Discharge Elimination System (NPDES).

Because the Project would involve construction activity that disturbs more than one acre of land, the Project would require compliance with the SWRCB's NPDES General Permit for Stormwater Discharges Associated with the Construction and Land Disturbance Activities (General Permit). The General Permit requires preparation of a Project-specific SWPPP after remediation is initiated, which describes practices to reduce pollutants in stormwater discharges by implementing best management practices (BMPs). While the Project would not involve mass grading activities, it would comply with SCAQMD Rule 403 (RR-AQ-1) for fugitive dust, which includes measures such as regular watering of active grading and unpaved areas, limiting vehicle speeds on unpaved surfaces, stabilizing stockpiled earth, and curtailing grading operations during high wind conditions. As such, substantial pollutants, including sediment, would not be introduced into storm water runoff during Project construction.

Most of the Project site is covered with concrete and would not change with implementation of the Project. As such, the cover system would continue to prevent precipitation from infiltrating into underlying materials and groundwater. Additionally, the cover system would prevent the exposure of surface water runoff to hazardous materials, and the Project would not result in the violation of any water quality standards. As such, construction and operation of the Project would not have the potential to degrade surface or ground water quality. Impacts would be less than significant pursuant to this threshold, and no mitigation is required.

b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project impede sustainable groundwater management of the basin?

Less Than Significant Impact. Based on the RAP, groundwater within the perched zone was previously encountered at 60 ft bgs between 1999 and 2013. This perched zone is presently depleted of groundwater, and most monitoring wells with screening intervals above 65 ft bgs were found to be dry in 2019 and 2020 (EKI 2021). Based on these findings, project excavation at the Skim Pond on the LOC Site and the two underground pipelines on the MLOC Site would avoid contact with groundwater. SWRCB Resolution No. 92-49 requires a discharger to address the effects of its waste discharge in a manner that promotes attainment of either background water quality (i.e., water quality that existed before the discharge), or the best water quality that is reasonable if background water quality cannot be restored. During operations, the Project would implement groundwater quality monitoring to observe the success of the remedial activities and would not involve direct or indirect withdrawals of groundwater. The cover system would also prevent precipitation from infiltrating into underlying materials and groundwater. Therefore, the Project would not deplete groundwater supplies or interfere substantially with groundwater recharge. As such, potential impacts related to groundwater recharge would be less than significant, and no mitigation is required.

c) Substantially alter the existing drainage pattern of the site or area, including 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;

Less than Significant Impact. In the existing conditions, surface stormwater runoff from the existing Project site flows towards the south and west to the existing gutters along Avalon Boulevard and Compton Boulevard. There is currently no storm drain system on-site, and all drainage sheet flows off-site and to the public streets along Avalon Boulevard and Compton Boulevard. Given the amount of impervious area would not change, the drainage pattern would not be significantly altered. Additionally, as stated above, the Project will prepare a SWPPP after initiating remediation and implementing BMPs during various phases of remediation and comply with the County's Building Code, specifically Code of Ordinances Title 26, Appendix J, which addresses grading, excavation and earthwork construction. Impacts would be less than significant pursuant to this threshold, and no mitigation is required.

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

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

Less than Significant Impact. As stated above, given the amount of impervious area would not change, the drainage pattern would not be significantly altered. As such, the Project's stormwater runoff volumes during proposed conditions would be similar to existing conditions and would not result in additional flooding on- or off-site. As such, implementation of the RAP would not exceed capacity of existing or planned stormwater drainage systems. Impacts would be less than significant pursuant to this threshold and no mitigation is required.

iv) impede or redirect flood flows?

Less than Significant Impact. The Federal Emergency Management Agency (FEMA) has prepared flood insurance rate maps for use in administering the National Flood Insurance Program. According to the FEMA flood map, the site is in Zone X, an area of minimal flood hazard (FEMA 2024).

As stated above, the existing Project site is mostly paved, the Project would not significantly alter the drainage pattern. Similarly, the Project would not result in increased stormwater runoff volumes compared to existing conditions. As such, implementation of the RAP would not substantially impede or redirect flood flows. Project impacts would be less than significant pursuant to this threshold and no mitigation is required.

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

No Impact. Tsunamis are waves generated by undersea earthquakes or landslides. The site is more than nine miles from the Pacific Ocean and, as shown on the Department of Conservation California Geological Survey (CGS) Tsunami Hazard Area Map, the Project site is not within a tsunami inundation area (CGS 2024). As such, the potential for the Project site to be adversely impacted by earthquake-induced tsunamis is considered negligible.

A seiche is the resonant oscillation of a body of water, such as a lake, reservoir, bay, or harbor. Seiche hazards exist where ground shaking causes water to splash out of the body of water and inundate nearby areas and structures. Seiches are caused by strong winds and rapid changes in atmospheric pressure. Earthquakes, tsunamis, and severe storm fronts may also cause seiches. The Project site is more than nine miles from the Pacific Ocean, and there are no large bodies of water upstream of the site that may be subject to seiche. Therefore, the potential for the Project site to be adversely impacted by earthquake-induced seiches is low.

Lastly, as indicated above, per the FEMA flood map, the Project site is in Zone X, which is an area of minimal flood hazard (FEMA 2024). The Project site is not located within the 0.2 percent annual chance (500 year) of flooding. As such, no flood hazards are anticipated. Impacts related to tsunami, seiche, or flooding would be less than significant pursuant to this threshold and no mitigation is required.

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

Less than Significant Impact. The Los Angeles RWQCB Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties applies to the waterbodies near and groundwater underlying the Project site. The Project site is located within the Coastal Plain of Los Angeles Groundwater Basin, Central Subbasin, which does not have a designated groundwater sustainability plan (DWR 2025).

The Project proposes to remediate the existing contaminated Project site, to meet the remedial action and cleanup goals established for the Project, which are to protect human health, groundwater resources, and the environment, maintain protection over time, and minimize untreated waste. As stated in the RAP, the existing VOCs on-site from historic hazardous uses have volatilized and leached into the groundwater and migrated south of the MLOC and LOC Site. Releases from other surrounding commercial and industrial uses are contributing to the groundwater contamination, as expressed by samples taken at existing aquifer monitoring wells within the surrounding area (EKI 2021). As such, one of the Project's goals is to remediate VOCs and cleanup contaminants, which in turn, would result in cleaner groundwater quality. During construction, the Project would implement BMPs to ensure the reduction of pollutants from construction activities. During operations, the Project would implement groundwater quality monitoring to observe the success of the remedial activities. The cover system would also prevent precipitation from infiltrating into underlying materials and groundwater.

Therefore, potential impacts pertaining to obstruction of implementing a water quality control plan or sustainable groundwater management plan would be less than significant pursuant to this threshold and no mitigation is required.

Mitigation Measures

Project implementation would not result in significant impacts related to Hydrology and Water Quality; therefore, no mitigation measures are required.

4.11 LAND USE AND PLANNING

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

Impact Analysis

Would the Project:

a) Physically divide an established community?

No Impact. As stated in Section 2.0, Project Description, the Project is approval and implementation of the RAP for the Former Mouren-Laurens Oil Company and Leach Oil Company sites in unincorporated Los Angeles County. There are no residential uses or established communities located within the Project site, as the site is currently occupied by structures ancillary to the site's use for oil production. No permanent structures would be built, with the exception of the wells that would be used as part of the remediation. As a result, there would be no impact to an established community, and no mitigation is required.

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?

Less than Significant Impact. The Project involves the implementation of a RAP for several properties located within unincorporated Los Angeles County. Both the MLOC and LOC Sites have a General Plan Land Use designation of Light Industrial (IL). This designation allows for light industrial uses, including light manufacturing, assembly, warehouse, and distribution centers. Both sites are zoned Light Manufacturing (M-1)-Industrial Preservation-Green Zone (IP-GZ). The M-1 Zone allows for light industry, repair, wholesale, and packaging, including manufacturing, assembly, distribution, and storage of goods that have low nuisance impacts but excluding raw-materials production, processing or bulk handling. Zone M-1 will also accommodate retail and service commercial uses to serve local employees and visitors (Los Angeles County 2024b).

The existing uses on the Project site are consistent with the said designations discussed above, and implementation of the proposed Project would not change the land use and zoning designations. Therefore, the Project would not result in a conflict with any land use plan or policy. Additionally, the existing uses are compatible with the surrounding uses, and in the absence of any changes proposed, the Project would remain consistent with the existing surrounding uses, which are a mix of industrial and commercial uses.

It is noted that Project's consistency with the regional plans is not analyzed, as the proposed Project is not of Statewide, regional, or area-wide significance, as defined by Section 15206 of the CEQA Guidelines.

Los Angeles County Code

As stated previously, the Project site is zoned Light Manufacturing (M-1), Industrial Preservation (IP), Green Zone (GZ) (Los Angeles County 2024b). The Project's implementation would not result in a conflict with the site's underlying zoning designations. As discussed, the Project involves the approval and implementation of the RAP that was prepared to address soil and groundwater contamination present onsite. The Project would not require a zone change or general plan amendment; thus, no loss in land designated for industrial uses would occur. In addition, the Project's implementation would benefit the site through remediation of existing soil and groundwater contamination, thus improving the site for future users. Therefore, the Project would be consistent with the IP designation.

The Project would also be consistent with the GZ designation, as the Project would assist the County in achieving the County's environmental justice goals by remediating soil and groundwater contamination present on properties located within a disadvantaged community.

Therefore, the Project would not cause a significant environmental impact, as the Project would not conflict with any applicable land use plan, policy, or regulation. As a result, impacts would be less than significant, and no mitigation is required.

Mitigation Measures

Project implementation would not result in significant impacts related to Land Use and Planning; therefore, no mitigation measures are required.

4.12 MINERAL RESOURCES

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

Impact Analysis

Would the Project:

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?

No Impact. The Surface Mining and Reclamation Act of 1975 (SMARA, Public Resources Code, Sections 2710-2796) provides a comprehensive surface mining and reclamation policy with the regulation of surface mining operations to assure that adverse environmental impacts are minimized and mined lands are reclaimed to a usable condition. SMARA also encourages the production, conservation, and protection of the State's mineral resources (DMR 2024). Under SMARA, the California Geological Survey designates Mineral Resources Zones (MRZs) according to the presence of or potential for underlying mineral resources. MRZ-1 is an area with no significant mineral deposits; MRZ-2 is an area with significant mineral deposits; and MRZ-3 is an area containing known mineral resources of undetermined significance. The Project site is designated as MRZ-1 (DMG 1982). Therefore, the Project's implementation would not result in a loss of availability of a known mineral resource. In addition, there is no active mining occurring on-site (DMR 2016).

Furthermore, a review of the California Department of Conservation, Geologic Energy Management Division Well Finder indicates that there is a single oil well (Well Number Compton 1) located at the Project site; however, the well is plugged and is not presently drilling (CalGEM 2024). As a result, no impacts to mineral resources would occur, and no mitigation is required.

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?

No Impact. As indicated above, there are no mineral, oil, or energy extraction and/or generation activities located within the Project site. Therefore, in light of the MRZ-1 designation and in the absence of any active mining on the on the site, the Project would not result in the loss of locally important mineral resources. No impact would occur, and no mitigation is required.

Mitigation Measures

Project implementation would not result in significant impacts related to Mineral Resources; therefore, no mitigation measures are required.

4.13 NOISE

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

Introduction

An analysis of potential noise and vibration impacts associated with the proposed Project was prepared and is presented summarized below, and the Noise Calculations are included as Appendix F to this IS/ND.

Noise and Vibration Concepts

Noise

"Sound" is a vibratory disturbance created by a moving or vibrating source and is capable of being detected. "Noise" is defined as sound that is loud, unpleasant, unexpected, or undesired and may therefore be classified as a more specific group of sounds. The effects of noise on people can include general annoyance; interference with speech communication; sleep disturbance; and, in the extreme, hearing impairment (Caltrans 2013a).

Sound pressure levels are described in units called the decibel (dB). Decibels are measured on a logarithmic scale. A doubling of the energy of a noise source (such as doubling of traffic volume) would increase the noise level by 3 dB. The human ear is not equally sensitive to all frequencies within the sound spectrum. To accommodate this phenomenon, the A-scale was devised; the A-weighted decibel scale (dBA) approximates the frequency response of the average healthy ear when listening to most ordinary everyday sounds and is used in this analysis. Human perception of noise has no simple correlation with acoustic energy. Due to subjective thresholds of tolerance, the annoyance of a given noise source is perceived very differently from person to person. The most common sounds vary between 40 dBA (very quiet) to 100 dBA (very loud). Normal conversation at 3 feet is approximately 60 dBA, while loud jet engine noises at 1,000 feet equate to 100 dBA, which can cause serious discomfort. Table 16 shows the relationship of various noise levels in dBA to commonly experienced noise events.

TABLE 16
NOISE LEVELS FOR COMMON EVENTS

Common Outdoor Activities	Noise Level (dBA)	Common Indoor Activities
	110	Rock Band
Jet fly-over at 300 m (1,000 ft)	100	
Gas lawn mower at 1 m (3 ft)	90	
Diesel truck at 15 m (50 ft) at 80 km/hr (50 mph)	80	Food blender at 1 m (3 ft); garbage disposal at 1 m (3 ft)
Noisy urban area, daytime gas lawn mower at 30 m (100 ft)	70	Vacuum cleaner at 3 m (10 ft)
Commercial area, heavy traffic at 90 m (300 ft)	60	Normal speech at 1 m (3 ft)
Quiet urban daytime	50	Large business office, dishwasher in next room
Quiet urban nighttime	40	Theater, large conference room (background)
Quiet suburban nighttime	30	Library
Quiet rural nighttime	20	Bedroom at night, concert hall (background)
	10	Broadcast/recording studio
Lowest threshold of human hearing	0	Lowest threshold of human hearing

dBA: A-weighted decibels; m: meter; ft: feet; km/hr: kilometers per hour.
Source: Caltrans 2013a.

Two equal noise sources, when heard together, do not "sound twice as loud" as one of the sources. As stated above, a doubling of noise sources results in a noise level increase of 3 dBA. It is widely accepted that (1) the average healthy ear can barely perceive changes of a 3 dBA increase or decrease, (2) a change of 5 dBA is readily perceptible, and (3) an increase (decrease) of 10 dBA sounds twice (half) as loud (Caltrans 2013a).

From the source to the receiver, noise changes both in the level and frequency spectrum. The most obvious change is the decrease in noise level as the distance from the source increases. Sound from a small, localized source (approximating a "point" source) radiates uniformly outward as it travels away from the source in a spherical pattern. For point sources, such as HVAC units or construction equipment, the sound level attenuates (or drops off) at a rate of 6 dBA for each doubling of distance (i.e., if the noise level is 70 dBA at 25 feet, it is 64 dBA at 50 feet). Vehicle movement on a road makes the source of the sound appear to emanate from a line (line source) rather than a point when viewed over some time interval. The sound level attenuates or drops off at a rate of 3 dBA per doubling of distance for line sources.

A large object in the path between a noise source and a receiver can significantly attenuate noise levels at that receiver location. The amount of attenuation provided by this "shielding" depends on the size of the object and the frequencies of the noise levels. Natural terrain or landform features as well as man-made features (e.g., buildings and walls) can significantly alter noise exposure levels. For a noise barrier to work, it must be high enough and long

enough to block the view from the receiver to a road or other noise source. Effective noise barriers can reduce outdoor noise levels at the receptor by up to 15 dBA.

Several rating scales (or noise "metrics") exist to analyze effects of noise on a community. These scales include the equivalent noise level (L_{eq}), L_{max}, and L_{min}, which are respectively the average, highest, and lowest A-weighted sound levels that occur during a noise event, and the Community Noise Equivalent Level (CNEL). Average noise levels over a period of minutes or hours are usually expressed as dBA L_{eq}, which is the equivalent noise level for that period of time. The period of time averaging may be specified; for example, $L_{eq(3\text{-}hour)}$ would be a three-hour average. Noise of short duration (i.e., substantially less than the averaging period) is averaged into ambient noise during the period of interest. Thus, a loud noise lasting a few seconds may have minimal effect on the measured sound level averaged over a one-hour period.

To evaluate community noise impacts, CNEL was developed to account for human sensitivity to nighttime noise. CNEL represents the 24-hour average sound level with a penalty for noise occurring at night. The CNEL computation divides a 24-hour day into three periods: daytime (7:00 AM to 7:00 PM), evening (7:00 PM to 10:00 PM), and nighttime (10:00 PM to 7:00 AM). The evening sound levels are assessed an approximately 5-dBA penalty, and the nighttime sound levels are assigned a 10-dBA penalty prior to averaging with daytime hourly sound levels.

Vibration

Vibration is an oscillatory motion through a solid medium in which the amplitude of the motion can be described in terms of displacement, velocity, or acceleration. Vibration is normally associated with activities such as railroads or vibration-intensive stationary sources but can also be associated with construction equipment such as jackhammers, pile drivers, and hydraulic hammers. Vibration displacement is the distance that a point on a surface moves away from its original static position. The instantaneous speed that a point on a surface moves is described as the velocity, and the rate of change of the speed is described as the acceleration. Each of these descriptors can be used to correlate vibration to human response, building damage, and acceptable equipment vibration levels. During construction of a project, the operation of construction equipment can cause ground borne vibration. During the operational phase of a project, receptors may be subject to levels of vibration that can cause annoyance due to noise generated from vibration of a structure or items within a structure. Analysis of this type of vibration is best measured in velocity and acceleration.

The three main wave types of concern in the propagation of ground borne vibrations are surface or Rayleigh waves, compression or P-waves, and shear or S-waves.

- Surface or Rayleigh waves travel along the ground surface. They carry most of their energy along an expanding cylindrical wave front, similar to the ripples produced by throwing a rock into a lake. The particle motion is more or less perpendicular to the direction of propagation (known as retrograde elliptical).

- Compression or P-waves are body waves that carry their energy along an expanding spherical wave front. The particle motion in these waves is longitudinal, in a push-pull motion. P-waves are analogous to airborne sound waves.
- Shear or S-waves are also body waves, carrying their energy along an expanding spherical wave front. Unlike P-waves, however, the particle motion is transverse, or perpendicular to the direction of propagation.

The peak particle velocity (PPV) or the root mean square (rms) velocity is usually used to describe vibration amplitudes. The PPV is defined as the maximum instantaneous peak of the vibration signal and the rms is defined as the square root of the average of the squared amplitude of the signal. The PPV is more appropriate for evaluating potential building damage and also used for evaluating human response.

The units for PPV are normally inches per second (in/sec). Often, vibration is presented and discussed in VdB units in order to compress the range of numbers required to describe the vibration. In this study, all PPV velocity levels are in in/sec and all vibration levels are in VdB relative to one microinch per second.

The threshold of human perception is approximately 0.3 in/sec PPV. Typically, groundborne vibration generated by human activities attenuates rapidly with distance from the source of the vibration. Even the more persistent Rayleigh waves decrease relatively quickly as they move away from the source of the vibration. Manmade vibration problems are, therefore, usually confined to short distances (500 feet or less) from the source.

Construction generally includes a wide range of activities that can generate groundborne vibration. In general, blasting and demolition of structures and pile driving generate the highest vibrations. Heavy trucks can also generate groundborne vibrations, which vary depending on vehicle type, weight, and pavement conditions. Potholes, pavement joints, discontinuities, differential settlement of pavement, and other anomalies all increase the vibration levels from vehicles passing over a road surface. Construction vibration is normally of greater concern than vibration of normal traffic on streets and freeways with smooth pavement conditions.

Existing Setting

Psomas conducted ambient noise monitoring at five locations representing the adjoining land uses around the Project site on December 11, 2024, and December 18, 2024. Two sets of short-term (approximately 20 minutes each) noise level measurements were conducted at three of the measurement locations and one short-term measurement was taken at each of the two remaining locations. The noise measurements were conducted using a Lason Davis Laboratories Model 831 (LD 831) sound level meter (SLM). The measurement microphone was placed approximately five feet above the ground and equipped with a windscreen. The SLM was set to "A"-weighted decibel reading and a time response of "slow."

The meteorological conditions were documented at the time of the noise monitoring. Overall, the sky was cloudy at the time of the noise monitoring, and temperatures ranged from 54 to 61 degrees Fahrenheit (^{0}F), with relative humidity measured at 24 percent. There was a light

breeze with wind speeds varying from 3 to 4 miles per hour. Table 17, Existing Measured Noise Levels at the Project Site, summarizes the results of the noise monitoring.

TABLE 17
EXISTING MEASURED NOISE LEVELS AT THE PROJECT SITE

Noise Monitoring Location Description	Primary Noise Sources	Measurement Start/End Time	Measured Noise Levels (dBA)		
			L_{eq}	L_{min}	L_{max}
Northern portion of Leach Oil Site, adjacent to tanks and skim pond	Truck noise: trucks idling and maneuvering, back-up alarms, horns, exhaust; birds chirping; industrial noise emanating from the north; ambient.	Start: 9:00 AM End: 9:20 AM	57.5	53.4	63.7
		Start: 9:31 AM End: 9:51 AM	59.9	55.6	70.2
West side of Avalon Boulevard, opposite the Project site	Traffic, wind, distant industrial (drills and saws), distant back-up alarms, truck horns.	Start: 10:11 AM End: 10:31 AM	70.0	52.0	80.2
		Start: 10:32 AM End: 10:52 AM	71.5	48.9	89.5
South side of Compton Boulevard, opposite the Project site	Traffic; trucks idling and maneuvering; truck horns; truck back-up alarms; distant barking dogs; forklifts; distant industrial.	Start: 11:13 AM End: 11:33 AM	69.2	47.4	92.8
		Start: 11:35 AM End: 11:55 AM	67.0	57.1	81.5
North side of Compton Boulevard adjacent to Saint Albert the Great Middle School	Children playing; traffic; pedestrians talking; truck back-up alarms; distant aircraft overflights; truck idling; birds chirping.	Start: 1:26 PM End: 1:46 PM	67.0	44.4	85.4
West side of Stanford Avenue, adjacent to the Multi-family residential	Traffic; distant aircraft overflights; birds chirping; pedestrians talking; distant lawn mower.	Start: 1:51 PM End: 2:11 PM	58.9	41.3	77.5

dBA: A-weighted decibels
L_{eq}: average measured noise level
L_{min}: minimum measured noise level
L_{max}: maximum measured noise level
Source: Psomas; noise data in Appendix F

As shown in Table 15, existing measured L_{eq} ranged from 57.5 to 71.5 dBA, with the highest noise levels recorded along the west side of Avalon Boulevard and north and south sides of Compton Boulevard. The predominant source of noise around the Project site is traffic traveling along the adjacent roadways as well as noise emanating from trucks. Other sources of noise during the measurements included distant industrial activities, birds chirping, wind, and children playing.

Sensitive Receptors

The State of California defines noise-sensitive receptors as those land uses that require serenity or are otherwise adversely affected by noise events or conditions (State of California 2015). The land use categories requiring the lowest noise thresholds are schools, libraries, churches, hospitals, and residences. Schools, libraries, churches, hospitals, and residences proximate to the Project site are referred to as the Project's "noise sensitive receptors" due to sensitivity of these uses to noise exposure.

The closest noise sensitive receptors to the Project site include the mobile home park that occupies the frontage along the south side of Compton Boulevard, opposite the Project site. Other noise sensitive receptors include Saint Albert the Great Middle School, located 230 feet to the east of the Site and the apartments located 175 feet to the northeast.

Regulatory Setting

Noise Criteria

Public agencies have established noise guidelines and standards to protect citizens from potential hearing damage and various other adverse physiological and social effects associated with noise. The Project is located within Los Angeles County. For the evaluation of potential noise impacts, this analysis assumes compliance with the noise policies and regulations established by the County of Los Angeles.

State of California

The California Buildings Standards Code, Title 24 of the *California Code of Regulations*, also known as the CBC, establishes building standards, including noise insulation standards, applicable to all occupancies throughout the State. The most recent building standards adopted by the legislature and used throughout the State is the 2022 version. Section 1206.4, Allowable interior noise levels, states "Interior noise levels attributable to exterior sources shall not exceed 45 dB in any habitable room. The noise metric shall be either the day-night average sound level (L_{dn}) or the CNEL, consistent with the noise element of the local general plan." (DGS 2021). These noise standards are for new construction in California for the purposes of interior compatibility with exterior noise sources. The regulations specify that acoustic studies must be prepared for new buildings with habitable rooms that are near major transportation noises, and where such noise sources create an exterior noise level of 60 dBA CNEL/L_{dn} or higher.

County of Los Angeles

The County of Los Angeles has established guidelines and standards in the County General Plan (Los Angeles County 2024) and the Los Angeles County Code, described in greater detail below.

Los Angeles County General Plan

The Los Angeles County General Plan includes a Noise Element to reduce and limit the exposure of the general public to excessive noise levels. The Noise Element sets the goals and policy direction for the management of noise in the unincorporated areas (Los Angeles County 2024). The County maintains the health and welfare of its residents with respect to noise through nuisance abatement ordinances and land use planning.

The General Plan identifies the following relevant Noise Goals:

- Policy N 1.3: Minimize impacts to noise-sensitive land uses by ensuring adequate site design, acoustical construction, and use of barriers, berms, or additional engineering controls through Best Available Technologies (BAT).
- Policy N 1.4: Enhance and promote noise abatement programs in an effort to maintain acceptable levels of noise as defined by the Los Angeles County Exterior Noise Standards and other applicable noise standards.
- Policy N 1.5: Ensure compliance with the jurisdictions of State Noise Insulation Standards (Title 24, California Code of Regulations and Chapter 35 of the Uniform Building Code), such as noise insulation of new multifamily dwellings constructed within the 60 dB (CNEL or Ldn) noise exposure contours.
- Policy N 1.6: Ensure cumulative impacts related to noise do not exceed health-based safety margins.

Los Angeles County Code

The County Noise Control Ordinance, Title 12 of the County Code, was adopted by the Los Angeles County Board of Supervisors in 1977 "…to control unnecessary, excessive, and annoying noise and vibration…." It declares that the purpose of the County policy is to "…maintain quiet in those areas which exhibit low noise levels and to implement programs aimed at reducing noise in those areas within the county where noise levels are above acceptable values." (Section 12.08.010 of the County Code). Title 12, Chapter 12.08 – Noise Control and Chapter 12.12 – Building Construction Noise of the County Code sets standards related to noise in the County. Below are excerpts of County Codes that are relevant to the Project.

Chapter 12.08 – Noise Control

Section 12.08.380 - Noise Zones Designated

Receptor properties described hereinafter in this chapter are hereby assigned to the following noise zones:

Noise Zone I—Noise-sensitive area; Noise Zone II—Residential properties; Noise Zone III—Commercial properties; Noise Zone IV—Industrial properties.

Section 12.08.390 - Exterior noise standards—Citations for violations authorized when.

A. Unless otherwise herein provided, the following exterior noise levels shall apply to all receptor properties within a designated noise zone:

Noise Zone	Designated Noise Zone Land Use (Receptor property)	Time Interval	Exterior Noise Level (dB)
I	Noise-sensitive area	Anytime	45
II	Residential properties	10:00 pm to 7:00 am (nighttime)	45
		7:00 am to 10:00 pm (daytime)	50
III	Commercial properties	10:00 pm to 7:00 am (nighttime)	55
		7:00 am to 10:00 pm (daytime)	60
IV	Industrial properties	Anytime	70

B. Unless otherwise herein provided, no person shall operate or cause to be operated, any source of sound at any location within the unincorporated county, or allow the creation of any noise on property owned, leased, occupied or otherwise controlled by such person which causes the noise level, when measured on any other property either incorporated or unincorporated, to exceed any of the following exterior noise standards:

Standard No. 1 shall be the exterior noise level, which may not be exceeded for a cumulative period of more than 30 minutes in any hour. Standard No. 1 shall be the applicable noise level from subsection A of this section; or, if the ambient L50 exceeds the foregoing level, then the ambient L50 becomes the exterior noise level for Standard No. 1.

Standard No. 2 shall be the exterior noise level, which may not be exceeded for a cumulative period of more than 15 minutes in any hour. Standard No. 2 shall be the applicable noise level from subsection A of this section plus 5dB; or, if the ambient L25 exceeds the foregoing level, then the ambient L25 becomes the exterior noise level for Standard No. 2.

Standard No. 3 shall be the exterior noise level, which may not be exceeded for a cumulative period of more than five minutes in any hour. Standard No. 3 shall be the applicable noise level from subsection A of this section plus 20dB; or, if the ambient L8.3 exceeds the foregoing level, then the ambient L8.3 becomes exterior noise level for Standard No. 3.

Standard No. 4 shall be the exterior noise level, which may not be exceeded for a cumulative period of more than one minute in any hour. Standard No. 4 shall be the applicable noise level from subsection A of this section plus 15dB; or, if the ambient L1.7 exceeds the foregoing level, then the ambient L1.7 becomes the exterior noise level for Standard No. 4.

Standard No. 5 shall be the exterior noise level which may not be exceeded for any period of time. Standard No. 5 shall be the applicable noise level from subsection A of this section plus 20dB; or, if the ambient L0 exceeds the foregoing level then the ambient L0 becomes the exterior noise level for Standard No. 5.

C. If the measurement location is on a boundary property between two different zones, the exterior noise level utilized in subsection B of this section to determine the exterior standard shall be the arithmetic mean of the exterior noise levels in subsection A of the subject zones. Except as provided for above in this subsection C, when an intruding noise source originates on an industrial property and is impacting another noise zone, the applicable exterior noise level as designated in subsection A shall be the daytime exterior noise level for the subject receptor property.

D. The ambient noise histogram shall be measured at the same location along the property line utilized in subsection B of this section, with the alleged intruding noise source inoperative. If for any reason the alleged intruding noise source cannot be turned off, the ambient noise histogram will be estimated by performing a measurement in the same general area of the alleged intruding noise source but at a sufficient distance such that the noise from the alleged intruding noise source is at least 10dB below the ambient noise histogram in order that only the actual ambient noise histogram be measured. If the difference between the ambient noise histogram and the alleged intruding noise source is 5 to 10dB, then the level of the ambient noise histogram itself can be reasonably determined by subtracting a one-decibel correction to account for the contribution of the alleged intruding noise source.

E. In the event the intrusive exceeds the exterior noise standards as set forth in subsections B and C of this section at a specific receptor property and the health officer has reason to believe that this violation at said specific receptor property was unanticipated and due to abnormal atmospheric conditions, the health officer shall issue an abatement notice in lieu of a citation. If the specific violation is abated, no citation shall be issued therefore. If, however, the specific violation is not abated, the health officer may issue a citation.

12.08.400 - Interior noise standards.

A. No person shall operate or cause to be operated within a dwelling unit, any source of sound, or allow the creation of any noise, which causes the noise level when measured inside a neighboring receiving dwelling unit to exceed the following standards:

Standard No. 1 The applicable interior noise level for cumulative period of more than five minutes in any hour; or

Standard No. 2 The applicable interior noise level plus 5dB for a cumulative period of more than one minute in any hour; or

Standard No. 3 The applicable interior noise level plus 10dB or the maximum measured ambient noise level for any period of time.

B. The following interior noise levels for multifamily residential dwellings shall apply, unless otherwise specifically indicated, within all such dwellings with windows in their normal seasonal configuration.

Noise Zone	Designated Land Use	Time Interval	Allowable Interior Noise Level (dB)
All	Multifamily	10 pm—7 am	40
	Residential	7 am—10 pm	45

C. If the measured ambient noise level reflected by the L50 exceeds that permissible within any of the interior noise standards in subsection A of Section 12.08.390, the allowable interior noise level shall be increased in 5dB increments in each standard as appropriate to reflect said ambient noise level (L50).

Part 4 – Specific Noise Restrictions

2.08.440 - Construction noise.

A. Operating or causing the operation of any tools or equipment used in construction, drilling, repair, alteration or demolition work between weekday hours of 7:00 p.m. and 7:00 a.m., or at any time on Sundays or holidays, such that the sound therefrom creates a noise disturbance across a residential or commercial real-property line, except for emergency work of public service utilities or by variance issued by the health officer is prohibited.

B. Noise Restrictions at Affected Structures. The contractor shall conduct construction activities in such a manner that the maximum noise levels at the affected buildings will not exceed those listed in the following schedule:

1. At Residential Structures.

a. Mobile Equipment. Maximum noise levels for nonscheduled, intermittent, short-term operation (less than 10 days) of mobile equipment:

	Single-family Residential	Multi-family Residential	Semi residential/ Commercial
Daily, except Sundays and legal holidays, 7:00 a.m. to 8:00 p.m.	75 dBA	80 dBA	85 dBA
Daily, 8:00 p.m. to 7:00 a.m. and all day Sunday and legal holidays	60 dBA	64 dBA	70 dBA

b. Stationary Equipment. Maximum noise level for repetitively scheduled and relatively long-term operation (periods of 10 days or more) of stationary equipment:

	Single-family Residential	Multi-family Residential	Semi residential/ Commercial
Daily, except Sundays and legal holidays, 7:00 a.m. to 8:00 p.m.	60 dBA	65 dBA	70 dBA
Daily, 8:00 p.m. to 7:00 a.m. and all day Sunday and legal holidays	50 dBA	55 dBA	60 dBA

2. At Business Structures.

a. Mobile equipment. Maximum noise levels for nonscheduled, intermittent, short-term operation of mobile equipment:

Daily, including Sunday and legal holidays, all hours: maximum of 85dBA.

C. All mobile or stationary internal-combustion-engine powered equipment or machinery shall be equipped with suitable exhaust and air-intake silencers in proper working order.

D. In case of a conflict between this chapter and any other ordinance regulating construction activities, provisions of any specific ordinance regulating construction activities shall control.

Part 5 - Exemptions

The following activities set out in this chapter shall be exempted from the provisions of this chapter:

A. Emergency Exemption. The emission of sound for the purpose of alerting persons to the existence of an emergency, or the emission of sound in the performance of emergency work;

B. Warning Devices. Warning devices necessary for the protection of public safety, as for example police, fire and ambulance sirens, and train horns;

C. Outdoor Activities. Activities conducted on public playgrounds and public or private school grounds, including but not limited to school athletic and school entertainment events;

D. Exemption from Exterior Noise Standards. The following activities are exclusively regulated by the prohibitions of Part 4 of this chapter:

1. Construction,
2. Stationary nonemergency signaling devices,
3. Emergency signaling devices,
4. Refuse collection vehicles,
5. Residential air-conditioning or refrigeration equipment,
6. Forced-air blowers.

Part 6 - Variances

12.08.580 - Conditions for granting variances—Health officer authority.

A. Variances from the requirements of this chapter may be granted by the health officer for a period of not to exceed two years, subject to such terms, conditions and requirements as he may deem reasonable. A variance may be granted only if the health officer makes the findings that:

    1. Additional time is necessary for the applicant to alter or modify his activity, operation or noise source to comply with this chapter; or

    2. The activity, operation or noise source cannot feasibly be done in a manner that would comply with the provisions of this chapter, and no other reasonable alternative is available to the applicant.

B. In granting a variance, the health officer may prescribe any conditions or requirements he deems necessary to minimize adverse effects upon the community or the surrounding neighborhood.

C. In granting variances, the health officer shall consider the magnitude of nuisance caused by the offensive noise, the uses of property within the area of impingement by the noise, operations carried on under existing nonconforming rights or conditional use permits or zone variances, the time factors related to study, design, financing and construction of remedial work, the economic factors related to age and useful life of the equipment, the general public interest, health and welfare, the feasibility of plans submitted for correction, and the effect on the community if the variance was refused.

Chapter 12.12 - BUILDING CONSTRUCTION NOISE

12.12.030 - Construction Noise Prohibited When.

Except as otherwise provided in this chapter, a person, on any Sunday, or at any other time between the hours of 8:00 p.m. and 6:30 a.m. the following day, shall not perform any construction or repair work of any kind upon any building or structure, or perform any earth excavating, filling or moving, where any of the foregoing entails the use of any air compressors; jackhammers; power-driven drill; riveting machine; excavator, diesel-powered truck, tractor or other earth moving equipment; hand hammers on steel or iron, or any other machine, tool, device or equipment which makes loud noises to the disturbance of persons occupying sleeping quarters in a dwelling, apartment, hotel, mobile home, or other place of residence.

12.12.040 - Exemptions—Certain zoned areas.

The provisions of this chapter do not apply in any territory which is in a zone in which the Zoning Ordinance, codified in Title 22 of this code, prohibits any residential use and which is not less than 500 feet from any territory in any residential zone as defined in Section 201 of Ordinance 1494, or any territory in a residential zone in any city.

Vibration Criteria

Public agencies have established vibration guidelines and standards to protect citizens and structures from potential structural damage and annoyance and various other adverse physiological and social effects associated with vibration. The Project is located within Los Angeles County. For the evaluation of potential vibration impacts, this analysis assumes compliance with the vibration policies and regulations established by the County of Los Angeles.

County of Los Angeles

Los Angeles County Code

Title 12, Chapter 12.08 – Noise Control of the County Code sets standards related to vibration in the County. Below are excerpts of County Codes that are relevant to the Project.

12.08.560 - Vibration.

Operating or permitting the operation of any device that creates vibration which is above the vibration perception threshold of any individual at or beyond the property boundary of the source if on private property, or at 150 feet (46 meters) from the source if on a public space or public right-of-way is prohibited. The perception threshold shall be a motion velocity of 0.01 in/sec over the range of 1 to 100 Hertz.

Impact Analysis

Would the Project 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?

Less than Significant Impact.

Construction Noise

The implementation of the proposed Project would entail temporary site preparation activities, which includes noise generated from demolition of storage tanks; excavation for removal of tanks and contaminated soil; drilling/boring for soil sampling; SVE/AS systems installation; and paving. The analysis of construction noise involved the modeling of average (L_{eq}) construction noise levels using the Federal Highway Administration (FHWA) Roadway Construction Noise Model (RCNM) Version 1.1, which allows for quantification of noise levels emanating from individual machinery. Average noise levels represent the noise levels that would typically occur during construction and were calculated using the distance between the closest noise sensitive uses/receptors and the center of the construction activity (for example, the center for the excavation of contaminated soil was placed at the center of the skim pond). The degree to which noise-sensitive receptors are affected by noise from construction activities depends heavily on their proximity to each other. Noise levels are

evaluated at neighboring receptors based on their corresponding thresholds for construction noise established by the County. Estimated noise levels attributable to construction of the proposed Project are shown in Table 18, Average Construction Noise Levels at Adjacent Receptors, and calculations are included in Attachment B, Noise and Vibration Data.

TABLE 18
AVERAGE CONSTRUCTION NOISE LEVELS AT ADJACENT RECEPTORS

	North – Industrial		South – Mobile Home Park		East – St Albert the Great School and Multi-family Residential		West – Industrial	
Construction Phase	**Project L_{eq}* (dBA)**	**Exceeds Daytime L_{eq} Limit of 85 dBA?**	**Project L_{eq}* (dBA)**	**Exceeds Daytime L_{eq} Limit of 75 dBA?**	**Project L_{eq}* (dBA)**	**Exceeds Daytime L_{eq} Limit of 75 dBA?**	**Project L_{eq}* (dBA)**	**Exceeds Daytime L_{eq} Limit of 85 dBA?**
Demolition	75	No	58	No	45	No	61	No
Excavation of Soil	70	No	60	No	45	No	60	No
Drilling/Boring	65	No	61	No	47	No	59	No
SVE/AS Installation	73	No	69	No	55	No	67	No

L_{eq} dBA: average noise energy level in A-weighted decibels

* Based on calculated Leq at distances from center of Project temporary construction activities.

Source (construction equipment noise levels): RCNM. Noise data in Appendix F.

Typical average hourly noise levels (L_{eq}) from Project-related construction activities would be 45 to 75 dBA at the nearest off-site receptors. It should be noted that the construction noise calculations conservatively assume simultaneous operation of all equipment during each construction phase. Relative to existing ambient noise levels around the Project site, the Project construction would result in no increase in hourly noise levels at the measurement location along the west side of Avalon Boulevard, west of the Project site; increases of up to 2 dB in average hourly noise levels south of the Project site, increases of 5 to 17 dB in average hourly noise levels at the façade of the building north of the Project site; and no increases in hourly noise levels at the measurement locations east of the site. Therefore, average Project construction noise level increases would be clearly noticeable at the nearest areas north of the Project site; however, there are no exterior areas of frequent human use in such areas. Short-term Project-related site preparation and soil sampling noise levels are anticipated to be below the County's 75 dBA and 85 dBA L_{eq} noise thresholds for residential and commercial properties, respectively. Therefore, noise impacts related to the above Project activities are anticipated to be less than significant.

<u>On-road Construction Noise</u>

Truck trips are needed for delivery of construction equipment and materials as well as the export of approximately 280 cubic yards of excavated soils. Noise generated from truck trips would increase the ambient noise level generated by vehicle and truck traffic. Noise level

increases of 3 dBA are barely perceptible in outdoor environments. A 3-dB increase is thus used as the threshold of significance for off-site vehicular noise impacts. For traffic noise levels to be increased by 3 dB by the Project, Project-related traffic would have to result in a doubling of the existing traffic volumes on local roadways in the Project area. Because Project traffic volumes would be far below the existing high volume of trucks and passenger vehicles already traveling along the adjacent roadways (Avalon Boulevard and Compton Boulevard), off-site traffic noise increases due to Project-related traffic would be well below 3 dB. As a result, less than significant impacts from on-road construction vehicle trips would occur.

Operational Noise

The main Project operational noise source would be the SVE/AS systems to be used for removal of VOCs and contaminants from soil within the Project site. The Project proponent plans to use an acoustic curtain around the system to control noise from the unit. Project operations noise was calculated using measurements collected at similar SVE/AS systems. These noise levels are presented below in Table 19.

TABLE 19
SVE/AS SYSTEM OPERATIONAL NOISE

Location	Average Noise Levels (dBA)
At the SVE/AS and within the acoustic curtain	87.4
10 ft from SVE/AS and within the acoustic curtain	78.2
10 ft from SVE/AS and outside the acoustic curtain	73.5
20 ft from SVE/AS and outside the acoustic curtain	69.6

Source: EKI Environment & Water, Inc. 2024
ft: feet; dBA: decibels

The analysis of operational noise considered noise generated by a single SVE/AS system positioned within the back center of the Leach Oil Company Site (the center of operational noise was positioned at the center of the skim pond, the location where the dumping of various compounds occurred). Surface piping would be connected to the SVE/AS system, extend into the ground, and branch out to various locations throughout the Project site, where VOCs would be conveyed through the surface piping to the SVE/AS system unit. The noise levels measured at 20 feet from the SVE/AS system outside the acoustic curtains were used to quantify operational noise, which is presented below in Table 20. As indicated previously, the SVE/AS system would operate for 24 hours. Therefore, the County's nighttime stationary source thresholds were utilized to determine Project impacts.

TABLE 20
NIGHTTIME OPERATIONAL NOISE AT NEARBY RECEPTORS

Nighttime Operational Noise							
North – Industrial		South – Mobile Home Park (380 ft)		East – St Albert the Great School and Multi-family Residential (590 ft)***		West – Industrial (357 ft)	
Project Hourly L_{eq}* (dBA)	Exceeds Nighttime Hourly L_{eq} Limit of 60 dBA?**	Project Hourly L_{eq}* (dBA)	Exceeds Nighttime Hourly L_{eq} Limit of 50 dBA?**	Project Hourly L_{eq}* (dBA)	Exceeds Nighttime Hourly L_{eq} Limit of 55 dBA?**	Project Hourly L_{eq}* (dBA)	Exceeds Nighttime Hourly L_{eq} Limit of 60 dBA?**
55	No	44	No	30	No	45	No

Hourly L_{eq} (dBA): average noise energy level in A-weighted decibels in a one-hour period

ft: feet

* Based on calculated L_{eq} at distances from the SVE/AS unit.

**Nighttime limits are applicable between 8:00 PM and 7:00 AM, Monday through Saturday, and any time on Sunday or a Federal holiday.

*** 10-dB noise reduction was applied to account for shielding provided by the intervening structures located onsite.

Source (construction equipment noise levels): RCNM. Noise and Vibration Data in Attachment B.

As shown in Table 18, operational noise is anticipated to be below the County's nighttime stationary equipment noise limits applicable to single- and multi-family residential and industrial land uses. As a result, potential operational noise impacts are anticipated to be less than significant, and no mitigation is required.

b) Generation of excessive groundborne vibration or groundborne noise levels?

Less than Significant Impact. Pile driving and blasting are generally the sources of the most severe vibration during construction of projects. Neither pile driving nor blasting would be used during the Project construction. Conventional construction equipment would be used for demolition, excavation, drilling, and SVE/AS installation. Table 21 summarizes typical vibration levels measured during construction activities for various vibration-inducing pieces of equipment (FTA, 2018).

Vibration generated during Project site preparation and soil sampling activities would be minimal and limited to the duration of the construction phase. In addition, the Project would require neither the use of unusual equipment nor any pile driving or blasting. Construction induced vibration was modeled using data and methodology published by the FTA.

TABLE 21
VIBRATION LEVELS FOR CONSTRUCTION EQUIPMENT

Equipment		PPV at 25 ft (in/sec)
Pile driver (impact)	upper range	1.518
	typical	0.644
Pile driver (sonic)	upper range	0.734
	typical	0.170
Vibratory roller		0.210
Large bulldozer		0.089
Caisson drilling		0.089
Loaded trucks		0.076
Jackhammer		0.035
Small bulldozer		0.003

PPV: peak particle velocity; ft: feet; in/sec: inches per second.
Source: Caltrans 2013; FTA 2018.

The shortest distance from the nearest existing buildings to demolition, excavation, and drilling locations identified in Figures 16 and 17 of the RAP would be between 30 to 40 feet. At such distances, groundborne vibration levels from a small bulldozer, anticipated to be employed during the demolition and soil excavation activities, would be below 0.003 in/sec PPV. In addition, groundborne vibration from a hollow stem auger drill, to be utilized during the drilling of boreholes to collect soil samples, would not be perceptible at locations of nearby buildings.

Project-related vibration levels would be below the Los Angeles County vibration velocity limit of 0.01 in/sec. Therefore, the proposed Project would not generate or expose persons or structures to excessive groundborne vibration. Project related vibration impacts would be less than significant.

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?

No Impact. The Project site is located approximately 0.80 miles northwest of Compton/Woodley Airport. Nevertheless, the Project site is not situated within the aforementioned Airport's 65 CNEL noise contour boundaries (DRP 2014). The Project site is not located within the vicinity of a private airstrip. Aircraft overflights do not significantly contribute to the noise environment at the Project site, and the Project would not expose people working within the Project site to excessive aircraft noise levels. There would be no impact related to aircraft noise exposure at the Project site, and no mitigation is required.

Mitigation Measures

Project implementation would not result in significant impacts related to Noise; therefore, no mitigation measures are required.

4.14 POPULATION AND HOUSING

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

Impact Analysis

Would the Project:

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)?

No Impact. The proposed Project is the approval and implementation of the RAP. No direct or indirect population growth would occur: the Project will not result in direct population growth and will not extend urban services such as roadways, infrastructure, and other improvements.

The Project involves the implementation of the RAP for the Former Mouren-Laurens Oil Company and Leach Oil Company Sites. No development is contemplated as part of this Project. Implementation of the Project would not require extending or improving infrastructure in a manner that would facilitate off-site growth in the area. Furthermore, the Project does not propose residential units and would therefore not generate an increase in population or directly induce unplanned population growth. As a result, no impacts would occur.

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

No Impact. Activities on the Project site include oil extraction-related uses. There are no housing units located on-site. As such, implementation of the Project would not displace any residents or housing units. Therefore, no impacts related to displacement of housing and associated residents would result with Project's implementation, and no replacement housing or mitigation is required.

Mitigation Measures

Project implementation would not result in significant impacts related to Population and Housing; therefore, no mitigation measures are required.

4.15 PUBLIC SERVICES

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) 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:				
i) Fire protection?	☐	☐	☒	☐
ii) Police protection?	☐	☐	☒	☐
iii) Schools?	☐	☐	☐	☒
iv) Parks?	☐	☐	☐	☒
v) Other public facilities?	☐	☐	☐	☒

Impact Analysis

Would the Project:

a) 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:

i) Fire protection?

Less than Significant Impact. Fire protection services are provided to the unincorporated community of West Rancho Dominguez and the Project site by the Los Angeles County Fire Department (LACoFD). The LACoFD operates a total of 177 stations throughout the County, and the closest station to the Project site is LACoFD Station 14, located approximately 3.5 miles to the northwest of the site.

The LACoFD also provides four 24-hour Haz-Mat units geographically located throughout the County, with the closest Haz-Mat team (Haz-Mat 105) located approximately 3.63 miles southeast of the Project site at 18915 South Santa Fe Avenue in the City of Compton.

The Project involves the implementation of the RAP to address various COCs present within the Former Mouren-Laurens Oil Company and Leach Oil Company Sites. The Project would be required to comply with all applicable codes, ordinances, and regulations (including the Los Angeles County Code and California Fire Code) regarding fire prevention and suppression measures, fire hydrants and sprinkler systems, emergency access, premises identification requirements, emergency responder radio coverage requirements, and other

similar requirements. In addition, remediation activities would be under the oversight of various agencies including the SCAQMD, RWQCB, and the Los Angeles County Fire Department, among others. Close coordination with these aforementioned agencies, including with the LACoFD, would minimize any potential impacts that may be associated with remediating hazardous COCs, such as flammable VOCs, that could result in increased calls for fire protection and hazardous materials services. Therefore, in light of compliance with regulatory requirements, the impacts related to fire protection services would be less than significant impacts, and no mitigation is required.

ii) Police protection?

Less than Significant Impact. Law enforcement services are provided to the unincorporated community of West Rancho Dominguez and the Project site by the Los Angeles County Sheriff's Department (LASD). The closest LASD station to the Project site is the South Los Angeles Station, located approximately 3 miles northwest of the site along the south side of Imperial Highway.

The Project involves the implementation of the RAP to address various COCs present within the Former Mouren-Laurens Oil Company and Leach Oil Company Sites. The Project site would be secured throughout the remediation process, from demolition and site preparation through completion of the remediation process. The existing security measures such as controlled access, security cameras and lighting will be in place during and following the remediation. No additional services beyond the existing level of service to the Project site is required. The Project's potential impacts would be less than significant impact, and no mitigation is required.

iii) Schools?

No Impact. The proposed Project is implementation of a RAP and does not involve construction of residential units that would increase student populations and hence demand for school services. Therefore, no impacts associated with the need for new or physically altered government facilities, such as schools, would occur, and no mitigation is required.

iv) Parks?

No Impact. The Project involves the implementation of the RAP to remediate COCs present within the Former Mouren-Laurens Oil Company and Leach Oil Company Sites. The proposed Project does not involve construction of uses that would generate population and increase demand for park and recreation facilities. Therefore, no increase in the use of existing public park facilities would occur that would result in physical deterioration of existing parks, nor would the Project's implementation require the need for new or physically altered facilities. No impact would occur, and no mitigation is required.

v) Other public facilities?

No Impact. The Project involves the implementation of the RAP to remediate COCs present within the Former Mouren-Laurens Oil Company and Leach Oil Company Sites. The

proposed Project would not introduce new residents into the area, which would increase the use of existing library services. As such, the Project would not require the construction of new or alteration of existing library facilities, and no physical impacts would result. No impacts would occur, and no mitigation is required.

Mitigation Measures

Project implementation would not result in significant impacts related to Public Services; therefore, no mitigation measures are required.

4.16 RECREATION

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

Impact Analysis

Would the Project:

a) 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?

No Impact. The Project is the approval and implementation of a RAP, and it would not introduce new residents into the area that would increase use of existing parks causing deterioration of the facilities or increase demand for parks and recreation facilities requiring construction of new or expansion of existing facilities.

Project implementation would result in short-term employment generation; however, these employees would likely be residents of the County and thus would not increase demand for parks and recreational facilities. Thus, no impacts would occur, and no mitigation is required.

b) Include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?

No Impact. As described above, the Project would not increase the County's residential population, and the nominal increase in employees would be temporary (employment lasting the duration of remediation). Because the residential population would not increase, no demand for recreational facilities would result such that expansion of existing or construction of new recreational facilities would be required. Therefore, no potential impacts on the environment would occur because of construction activities. In addition, due to its nature, the Project is exempt from payment of Quimby Act Parkland and Open Space acquisition fees. As such, no impacts are expected to occur, and no mitigation is required.

Mitigation Measures

Project implementation would not result in significant impacts related to Recreation; therefore, no mitigation measures are required.

4.17 TRANSPORTATION

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

Impact Analysis

Would the Project:

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

Less than Significant Impact. The following transportation-related programs and plans, including the Mobility Element of the Los Angeles County General Plan, the Los Angeles County Vision Zero Action Plan (Los Angeles County Department of Public Works (DPW) 2019), the Willowbrook/West Rancho Dominguez Community Pedestrian Plan (DPH 2024), and the Los Angeles County 2012 Bicycle Master Plan (DPW 2012)discuss existing transit, roadways, bicycle, and pedestrian facilities within the County and City and in the vicinity of the Project site.

Transit

The Project site is currently served by Los Angeles Metro (LA Metro), which offers bus service along Compton Boulevard with LA Metro Line 127 and along Avalon Boulevard with LA Metro Line 51. There are two LA Metro Line 127 stops located along both sides of Compton Boulevard and two LA Metro Line 51 stops located along both sides of Avalon Boulevard. The Project would result in less than significant impacts to transit service, as the Project involves the implementation of a RAP that was prepared to remediate various COCs present in the underlying soils and groundwater. Additionally, the Project would not result in conditions which would require the removal, relocation, and/or closure of the aforementioned bus stops. As such, the Project would not conflict with any programs, plans, or ordinances addressing transit facilities serving the Project site.

Roadways

Within a local context, the Project site occupies frontage along the east side of Avalon Boulevard, which is designated as a Major Highway in the County's General Plan Mobility

Element (DPW 2022b). Avalon Boulevard has a right-of-way width of 100 ft, two lanes of travel in each direction, raised center medians, and dedicated left-turn lanes. Meanwhile, the segment of Compton Boulevard that extends along the south side of the Project site is currently designated as a Secondary Highway. Compton Boulevard has a right-of-way width of 80 ft, two lanes of travel in each direction, and dedicated left-turn lanes. The Project's implementation would result in less than significant impacts to the adjacent roadways, as the Project involves the implementation of a RAP that was prepared to remediate various COCs present in the underlying soils and groundwater. Implementation of the RAP would not result in any lane or street closure that would restrict traffic on these roadways. In addition, an estimated 16 haul trucks with a capacity of 17 cy would be used during the remediation activities. The adjacent roadways would be able to accommodate temporary increases in Project-trips. As such, the Project would not conflict with any programs, plans, or ordinances addressing roadway facilities serving the Project site.

Bicycle and Pedestrian Facilities

Los Angeles County (as of the time of this document's preparation) is currently in the midst of updating the 2012 County of Los Angeles Bicycle Master Plan. Nevertheless, the County continues to be governed by the current Bicycle Master Plan. According to the Los Angeles County Bikeways Map, neither Avalon Boulevard nor Compton Boulevard contain any bicycle facilities (DPW 2024a). As such, no impacts related to bicycle facilities is anticipated.

Plans published to address issues experienced by pedestrians include the County's Vision Zero Action Plan and the Willowbrook/West Rancho Dominguez Community Pedestrian Plan (DPW 2019). Existing pedestrian facilities within the Project site include sidewalks and crosswalks at the intersection of Avalon Boulevard and Compton Boulevard. Various pedestrian infrastructure improvement projects and recommended actions were identified in the Willowbrook/West Rancho Dominguez Community Pedestrian Plan.

The Project's implementation would not physically impact any pedestrian facilities, nor would result in increased usage of that would result in a deterioration in performance metrics. In addition, the Project's implementation would not require the closure or removal of any pedestrian facilities, nor would the Project's remediation and operation preclude the implementation of the infrastructure improvement projects identified in the Willowbrook/West Rancho Dominguez Community Pedestrian Plan or any of the policies identified in the Vision Zero Action Plan. As such, the Project would not conflict with any programs, plans, or ordinances addressing bicycle and pedestrian facilities serving the Project site.

Therefore, there would be a less than significant impact, and no mitigation measures are required.

b) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

Less than Significant Impact. Section 15064.3(b)(1) of the State CEQA Guidelines refers to evaluating transportation impacts using vehicle miles traveled (VMT) for land use projects. It should be noted that the proposed Project is not a land use project; it is rather a short-term, remediation-based activity and would not generate any long-term change in traffic conditions.

The CEQA Guidelines Section 15064.3(b) states that, for many projects, a qualitative analysis of construction traffic may be appropriate. The VMT generated by the Project would occur on a short-term basis during pre-remediation demolition and site preparation, used oil and VOC removal, and excavation (contaminated soil removal) for worker trips throughout the duration of the Project. VMT refers to the amount and distance of automobile travel attributable to a project. The term "automobile" refers to on-road passenger vehicles, specifically cars and light trucks. Agencies are not required to include heavy-duty freight vehicles in their CEQA analyses under SB 743. Furthermore, it needs to be recognized that the VMT analysis of on-road passenger vehicles and light trucks is not required if total trips do not exceed 110 daily trips. If trips exceed the threshold of 110 trips per day, only then a quantitative VMT analysis would be required. The proposed Project would result in approximately 97 personal/work vehicles (on-road, passenger vehicles) traveling each day to and from the Project site, which is below the threshold of 110 daily trips. Therefore, preparation of a VMT analysis is not required.

As such, the Project would not conflict or be inconsistent with Section 15064.3(b) of the State CEQA Guidelines. There would be a less than significant impact, and no mitigation is required.

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

No Impact. The Project would not involve any permanent change to the roadway configurations and circulation in the Project area that would create hazards due to a geometric design feature. Additionally, the Project involves the implementation of a RAP, which would not require any change in land use, such that would represent an incompatible use. Therefore, remediation and operation of the Project would not increase traffic hazards or represent the introduction of an incompatible use. As a result, there would be no impact, and no mitigation is required.

d) Result in inadequate emergency access?

No Impact. Construction activities for the Project, including staging and worker parking would occur on site. All construction staging areas would be prohibited to occur on the street or within the public right-of-way. Additionally, full closure of any roadways (i.e., Compton Boulevard and Avalon Boulevard) or any lanes within these roadways is not anticipated. In the absence of any closure, the Project would not alter traffic patterns within the area around the site, during various phases of remediation, such that inadequate emergency access would result.

Therefore, no impact would occur with implementation of the Project, and no mitigation is required. In the long term, emergency access would remain the same and no impact pertaining to emergency access would occur. No mitigation is required.

Mitigation Measures

Project implementation would not result in significant impacts related to Transportation; therefore, no mitigation measures are required.

4.18 TRIBAL 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 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:				
1. 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	☐	☐	☒	☐
2. 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.	☐	☐	☒	☐

Introduction

This section evaluates the Project's potential to have adverse effects on Tribal Cultural Resources. The analysis in this section is based on the results of the archaeological records searches conducted by Psomas and consultation with California Native American Tribes, conducted by the RWQCB for the Project, as required by CEQA per AB 52.

Additionally, an inquiry was made to the California Native American Heritage Commission (NAHC) by Psomas to request a review of the Sacred Lands File (SLF) database regarding the possibility of Native American cultural resources and/or sacred sites in the Project vicinity that are not documented on other databases, and included in Appendix D. The NAHC results were negative.

Consistent with AB 52, the RWQCB provided notice of its decision to undertake the proposed Project to California Native American Tribes that requested to be on the CEQA project notification list. The notification invited each tribe to respond to the RWQCB in writing within 30 days if it sought AB 52 consultation. The following tribes were notified of the Project through their representatives: the Gabrieleno Band of Mission Indians – Kizh Nation, the Gabrielino/Tongva San Gabriel Band of Mission Indians, the Quechan Tribe of the Fort Yuma Reservation, the Rincon Band of Luiseno Indians, the San Manuel Band of Mission Indians (now the Yuhaaviatam of San Manuel Nation), and the Pala Band of Mission Indians. One tribe, the Yuhaaviatam of San Manuel Nation, responded to RWQCB's notice indicating that it would not be requesting consultation. The RWQCB did not receive any requests for consultation from any tribes who received the notice. Accordingly, no meetings were requested, and no consultation under AB 52 was conducted. Tribal consultation in accordance with AB 52 requirements is deemed complete.

Impact Analysis

Would the Project:

a) 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:

1. ***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)?***
2. ***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.***

Less than Significant Impact. As discussed in Section 4.5, Cultural Resources, the SCCIC record searches and literature review did not identify any previously recorded precontact or tribal cultural resources within the Project site. Furthermore, the SLF search did not identify the Project site as sensitive for known sacred lands/sites as the NAHC results were negative. The RWQCB did not receive information from any tribes as to whether tribal cultural resources were located within the Project area.

The Project site is underlain by sediment that has already been disturbed. Therefore, the Project is not anticipated to result in significant impacts to tribal cultural resources, if any, that are listed or may be 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). Project excavation at the Skim Pond on the LOC Site and the two underground pipelines on the MLOC Site would not extend into native soil not previously disturbed. However, implementation of the proposed Project may include borings in areas not previously disturbed or into native soil. Thus, despite the negative result from the SLF search, although unlikely, there may be a possibility that the Project encounter tribal cultural resources during boring activities. If that occurs, all work will stop, and a Native American Representative will be invited to evaluate the find, as part of the Project (Project Design Feature [PDF]).

Mitigation Measures

Implementation would not result in significant impacts related to Tribal Cultural Resources; therefore, no mitigation measures are required.

4.19 UTILITIES AND SERVICE SYSTEMS

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

Impact Analysis

Would the Project:

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?

Less than Significant Impact.

Water

Water services are currently provided to the Project site by the Golden State Water Company (GSWC)(DPW 2024b). According to GSWC's 2020 Urban Water Management Plan (UWMP), GSWC Southwest has reliable supplies to meet its retail customer demands through 2045 (GSWC 2020). The Project involves the implementation of the RAP for the Former Mouren-Laurens Oil Company and Leach Oil Company Sites. Any water consumed during the Project's construction (remediation) and operations phases would be temporary and would be sourced using existing water lines and sources. Given that the Project would involve the remediation of the Project site, it is not anticipated that the Project would require the relocation of, or the construction of, new or expanded water facilities. Therefore, there would be a less than significant impact, and no mitigation is required.

Wastewater Treatment

Wastewater generated from the Project site is collected and treated by the Los Angeles County Sanitation Districts, which consist of 24 independent special districts.

The Project site is situated within Sanitation District 8. Wastewater generated at the Project site is treated at the A.K. Warren Water Resource Facility located in the City of Carson. The A.K. Warren Water Resource Facility, the Sanitation Districts' oldest and largest wastewater treatment plant, serves a population of approximately 3.5 million people and treats an average of 260 MGD of wastewater, with a design capacity of 400 MGD (LACSD 2024c).

Any effluent from the Project would be temporarily impounded onsite within the storage tanks that are typically ancillary to the single-stall portable toilets that would be used onsite during the Project's remediation. This effluent would then be pumped from the tanks and transported to the A.K. Warren Water Resource Facility. The Project would not require the relocation or construction of new or expanded wastewater or storm facilities. Sewer lines for the Project would be connected to existing County sewer lines. Therefore, impacts would be less than significant, and no mitigation is required.

Storm Drainage

As stated previously, the Project would include an asphalt/concrete cover system to contain hazardous materials on-site. The cover system would also prevent precipitation from infiltrating into underlying materials and groundwater, as well as preventing the exposure of surface water runoff to hazardous materials. This system would be subject to compliance with all applicable local, State, and federal laws, and regulations, which would ensure the Project's impacts would be less than significant. The Project would not require the relocation of or new or expanded storm drainage facilities. Therefore, impacts related to stormwater facilities would be less than significant, and no mitigation is required.

Dry Utilities

Natural gas, electricity, and telecommunication services are provided to the Project site by the Southern California Gas Company, SCE, and various telecommunications companies including Time Warner Cable, Charter Communication, Cox Communications, AT&T U-verse, and Verizon, respectively. The Project's projected natural gas usage is shown in Table 10, in Section 4.6, Energy and the projected electricity usage is shown in Table 11, in Section 4.6, Energy. The Project involves the implementation of the RAP for the Former Mouren-Laurens Oil Company and Leach Oil Company Sites. Project construction would not encroach into the public right-of-way.

Therefore, the Project would not require the construction or expansion of water or wastewater infrastructure and treatment facilities, stormwater drainage, electric power, natural gas, and telecommunications facilities. Impacts would be less than significant, and no mitigation is required.

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

Less than Significant Impact. Water services are provided to the Project site, and the community of West Rancho Dominguez as a whole, by the GSWC. The Project site is situated within the GSWC's Southwest Service Area. According to GSWC's 2020 UWMP, GSWC Southwest has reliable supplies to meet its retail customer demands in normal, single dry years, and five consecutive dry year conditions through 2045 (GSWC 2020). Water consumed during the Project's remediation and operation phases would be temporary and would be sourced using existing water lines and sources. The amount of water used during Project remediation would be minimal and increases in water consumption can be adequately accommodated by the GSWC. Therefore, impacts related to water supplies would be less than significant, and no mitigation is required.

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?

Less than Significant Impact. As stated above, the Project site is situated within Sanitation District 8, which is located within the service boundaries of the A.K. Warren Water Resource Facility located in the City of Carson. The A.K. Warren Water Resource Facility treats an average of 260 MGD of wastewater and has a design capacity of 400 MGD (LACSD 2024c). Any effluent from the Project would be temporarily impounded onsite within the storage tanks that are typically ancillary to the single-stall portable toilets that would be used onsite during the Project's remediation phase. This effluent would then be pumped from the tanks and transported to the A.K. Warren Water Resource Facility. The Project's uses would contribute a very minimal amount of wastewater when compared to the wastewater capacity of the A.K. Warren Water Resource Facility. The Project would not exceed the capacity of the aforementioned wastewater treatment facility. As such, impacts would be less than significant, and no mitigation is required.

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?

Less than Significant Impact. Waste Management of Los Angeles County provides commercial waste collection for the community of West Rancho Dominguez, including the Project site. The proposed Project includes excavation, and the estimated 280 cy of soil removed from the Project site would be transported to various locations depending on the circumstances, including Waste Management's facility in Azusa; Chiquita Canyon or Waste Management's facility in the City of Simi Valley; soil safe in Adelanto, and the US Ecology Nevada Inc facility in Beatty, Nevada. Project construction is not anticipated to generate significant quantities of solid waste with the potential to affect the capacity of regional landfills. Further, all construction activities would be subject to conformance with relevant federal, State, and local requirements related to solid waste disposal. Specifically, the Project would be required to demonstrate compliance with the California Integrated Waste Management Act of 1989 (AB 939), which requires all California cities to "reduce, recycle,

and re-use solid waste generated in the State to the maximum extent feasible." AB 939 requires that at least 50 percent of waste produced is recycled, reduced, or composted. The Project would also be required to demonstrate compliance with the 2022 Green Building Code, which includes design and construction measures that act to reduce waste through material conservation and other construction-related efficiency measures. It should be noted that debris generated from pre-remediation demolition activities will be segregated into recyclable and non-recyclable materials and transported to and disposed of at appropriate off-site, permitted facilities. With the existing practices in place and compliance with the regulations discussed above, the Project's demolition -related solid waste impacts would be less than significant, and no mitigation is required.

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

Less than Significant Impact. As stated above, the proposed Project would comply with all federal, State, and local statutes and regulations related to solid waste, including the California Integrated Waste Management Act and City recycling programs. Specifically, the Project would be subject to AB 939, which requires that at least 50 percent of waste produced is recycled, reduced, or composted, and would be required to comply with Section 4.408 of the 2022 California Green Building Code Standards, which requires that at least 65 percent of nonhazardous construction and demolition waste from nonresidential construction operations be recycled and/or salvaged for reuse. Therefore, the Project would comply with all federal, State and local management and reduction regulations related to solid waste in addition to maintaining their current recycling practices in place. Impacts would be less than significant, and no mitigation is required.

Mitigation Measures

Project implementation would not result in significant impacts related to Utilities and Service Systems; therefore, no mitigation measures are required.

4.20 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 Incorporated	Less Than Significant Impact	No Impact
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?		☐	☐	☒
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☐	☒
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☐	☒
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	☒

Impact Analysis

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the Project:

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

No Impact. The proposed Project is located within a highly urban context and is not designated as a Fire Hazard Severity Zone within a State responsibility area or designated as a Very High Fire Hazard Severity Zone (VHFHSZ) within a local responsibility area, as defined by CAL FIRE (CAL FIRE 2023). Rather, the site is within a non-VHFHSZ area. As discussed in Section 4.8, Hazards and Hazardous Materials, the Project site is located near the I-110 and SR-91, which are considered Freeway Disaster Routes, and near Avalon Boulevard and Figuroa Street, which are considered Highway Disaster Routes (Los Angeles County 2014e).

During construction activities, no street closures such that would interfere with adopted emergency response or emergency evaluation plans would result. Temporary lane closure may occur during hauling of construction equipment and material to and from the site. The Project would comply with all conditions set forth in the Project specific Traffic Control Plan (TCP), which would be reviewed and approved by the County prior to initiation of construction activities. Therefore, with implementation of the required TCP, the temporary closure of a few lanes along Compton Boulevard and Avalon Boulevard would not result in a significant interference of emergency evacuation routes. Operationally, the Project would not affect emergency response or emergency evacuation of adjacent land uses as remediation of the site in the long-term would rely on natural processes underground to finish site cleanup.

In the event that an emergency evacuation route is needed, the Project could utilize nearby potential evacuation routes including the nearby highways and freeways. However, the implementation of the RAP, during either construction or operations, would not impair implementation or physically interfere with an adopted emergency plan. Additionally, because Checklist Response thresholds 4.20a through 4.20d apply only to those projects that are "located in or near state responsibility areas or lands classified as very high fire hazard severity zones", no impacts related to these thresholds would occur, and no mitigation is required.

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?

No Impact. The Project site is in a highly urbanized area of the City, and there are no large, undeveloped areas and/or steep slopes on or near the site that would exacerbate fire risks such that would expose the Project site and its employees to wildfire related hazards. The site and the surrounding areas are not located in designated VHFHSZ, as identified by CAL FIRE. Therefore, the Project is not expected to exacerbate wildfire risks and create pollutants associated with wildfire or uncontrolled spread of wildfire. Additionally, because the Wildfire threshold questions 4.20a through 4.20d, above, apply only to those projects that are "located in or near state responsibility areas or lands classified as very high fire hazard severity zones", no impacts related to these thresholds would occur, and no mitigation is required.

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?

No Impact. As previously described, the proposed Project is not within a designated VHFHSZ as defined by CAL FIRE. As discussed previously, the site is in a highly urbanized area and surrounded by developed land on all sides. Implementation of the RAP would not require construction of any buildings or structures, or any associated infrastructure that would exacerbate fire risk such that would result in a significant temporary or ongoing impact. Additionally, because the Wildfire threshold questions 4.20a through 4.20d, above, apply only to those projects that are "located in or near state responsibility areas or lands classified as very high fire hazard severity zones", no impacts related to these thresholds would occur, and no mitigation is required.

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?

No Impact. As previously described, the proposed Project is not within a designated VHFHSZ as defined by CAL FIRE. The Project is in a highly urbanized area that is in a generally flat topographical area away from downslope or landslide areas. Specifically, implementation of the Project would not 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. Additionally, because the Wildfire threshold questions 4.20a through 4.20d, above, apply only to those projects that are "located in or near state responsibility areas or lands classified as very high fire hazard severity zones", no impacts related to these thresholds would occur, and no mitigation is required.

Mitigation Measures

Project implementation would not result in significant impacts related to Wildfire; therefore, no mitigation measures are required.

4.21 MANDATORY FINDINGS OF SIGNIFICANCE

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Does the project 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) Does the project have impacts that are individually limited, but cumulatively considerable? ('Cumulatively considerable' means that the incremental effects of a 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) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☒	☐

Impact Analysis:

Would the Project:

a) 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?

Less than Significant Impact. There are no sensitive biological resources, habitats, or species on the Project site that would be affected by the Project. As indicated in Section 4.4, Biological Resources, of this IS/ND, given the current developed condition and the existing trees and shrubs on the site, migratory birds may nest on the vegetation on-site. However, compliance with the MBTA would avoid impacts to active bird nests during construction of the Project. Impacts on migratory birds would be less than significant.

Additionally, as discussed in Section 4.5, Cultural Resources, potential impacts to unknown cultural resources and human remains from implementation of the Project would be less than significant as the Project would not involve mass grading and encroaching into undisturbed soil such that would result in potential impacts to cultural resources and human remains. Therefore, Project does not have the potential to restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory. Overall, impacts would be less than significant

b) Have impacts that are individually limited, but cumulatively considerable? ('Cumulatively considerable' means that the incremental effects of a 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)

Less than Significant Impact. All reasonably foreseeable future developments in the County and nearby City of Compton would be subject to the same or similar environmental laws, regulations, and ordinances that have been described throughout this document. Furthermore, all development projects are in the County guided by the policies identified in the County's General Plan and by the ordinances established in the Los Angeles County Code. Therefore, compliance with applicable land use and environmental laws, regulations, and ordinances would ensure that environmental effects associated with the proposed Project would not combine with effects from reasonably foreseeable future development in the area to cause cumulatively considerable significant impacts. Cumulative impacts would therefore be less than significant, and no mitigation is required.

c) Have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

Less Than Significant Impact. As detailed throughout this IS/ND, the proposed Project would not exceed any significance thresholds or result in significant impacts in the environmental categories typically associated with indirect or direct effects to human beings, such as aesthetics, air quality, hazards and hazardous materials, noise, public services, or transportation. As such, impacts would be less than significant, and no mitigation is required.

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