

CALIFORNIA ENVIRONMENTAL QUALITY ACT INITIAL STUDY

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

PROJECT INFORMATION

PROJECT TITLE: Former Freeman Products Facility Remedial Action Plan		SITE CODING: 401377
PROJECT ADDRESS: 2040 Artesia Boulevard	CITY: Torrance	COUNTY: Los Angeles
PROJECT SPONSOR: Avnet, Inc.	CONTACT: Amy Manion, PG, CHG (Ramboll US Corporation)	PHONE: (213) 943-6323 amanion@ramboll.com
APPROVAL ACTION UNDER CONSIDERATION BY DTSC: ☐ Initial Permit Issuance ☐ Permit Re-Issuance ☐ Permit Modification ☐ Closure Plan ☐ Removal Action Workplan ☒ Remedial Action Plan ☐ Interim Removal ☐ Regulations ☐ Corrective Measure Study/Statement of Basis ☐ Other (specify):		
STATUTORY AUTHORITY: ☐ California H&SC, Chap. 6.5 ☒ California H&SC, Division 45, Part 2 ☐ Other (specify):		
DTSC PROGRAM/ADDRESS: Site Mitigation and Restoration Program 5790 Corporate Avenue Cypress, California 90630	CONTACT: Scarlett Zhai Scarlett.Zhai@dtsc.ca.gov	PHONE: (714) 484-5316

PROJECT DESCRIPTION:

The Department of Toxic Substances Control (DTSC), pursuant to authority granted under Division 45, section 78000 et seq., is considering approval of a Remedial Action Plan (RAP) to address contaminants of concern in groundwater, soil, and soil vapor in an area measuring approximately 2.3 acres at the Former Freeman Products site. The RAP was prepared to address the presence of chemicals of potential concern (COPCs) in subsurface soil vapor, soil, and groundwater at and downgradient of the Site. The recommended remedial alternative consists of implementing in-situ bioremediation (ISB) at 57 locations across the project site (50 new and seven existing locations for injection wells) plus monitored natural attenuation and implementation of institutional and engineering controls.

PROJECT LOCATION:

2040, 2000, and 1942 Artesia Boulevard, Torrance, CA 90504 ("Project Site"). Assessor Parcel Numbers (APNs): 4096-002-042; 4096-002-043; 4096-002-044; 4096-002-045; 4096-004-016.

BACKGROUND:

The Former Freeman Products Site ("FFP", addressed at 2040 Artesia Boulevard) is approximately 2.3 acres in size and is located on the south side of Artesia Boulevard, between Van Ness Avenue to the west and Western Avenue to the east. FFP is located in a mixed industrial-commercial-residential area in Torrance, California. FFP is currently owned by the Roman Catholic Archdiocese of Los Angeles and occupied by the Saint Francis Korean Catholic Church. Existing development on FFP includes one approximately 40,000 square-foot single-story building that is situated on the southern half of FFP. The northern half of FFP consists of a paved parking area and isolated planters. Immediately adjacent to FFP property is the Church of Jesus Christ of Latter-Day Saints property ("LDS", addressed at 2000 Artesia Boulevard) and the RDS Industries, Inc. property ("RDS", addressed at 1942 Artesia Boulevard).

Across Artesia Boulevard to the north of FFP are apartments and commercial businesses. To the east of FFP are the LDS and RDS properties. A condominium complex and single-family residences are located west of and adjacent to FFP. The property located south of and adjacent to FFP is a commercial nursery (Kubota Growers), which is leased from, and coincident with, a Southern California Edison (SCE) power line right-of way (see Figures 1 and 2).

The Site was historically used for agricultural purposes until the construction of the original building at the Site in 1963. From 1963 to 1974, Kaag Industries, the first industrial occupant of the Site, conducted metal plating and manufactured jewelry. From 1974 until 1994, Freeman Products manufactured trophies and awards at the Site. Data show that former on-site operations have impacted subsurface soil vapor, soil, and groundwater at and downgradient of the Site.

The Site has been the subject to subsurface investigations and remediation since the facility closed in the mid-1990s. The following types of chemicals of potential concern (COPCs) have been identified for the Site: volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), total petroleum hydrocarbons (TPH), metals, and cyanide. The primary COPCs identified for the Site are trichloroethylene (TCE), tetrachloroethylene (PCE), and 1,1-dichloroethene (1,1-DCE) in all media, and 1,4-dioxane in groundwater only.

PROJECT ACTIVITIES:

On behalf of Avnet, Inc. (Avnet), Ramboll Americas Engineering Solutions, Inc. (Ramboll) prepared a Feasibility Study/Remedial Action Plan (FS/RAP) that was submitted to the Department of Toxic Substances Control (DTSC) in April 2024. The objective of the FS is to evaluate remedial technologies/processes for addressing groundwater, soil, and soil vapor impacts at the FFP property and groundwater and soil vapor impacts at downgradient properties (i.e., the LDS and RDS properties). The objective of the RAP is to summarize the proposed implementation of the recommended remedial alternative.

The recommended remedial alternative consists of the installation of six subsurface in-situ bioremediation (ISB) reactive barriers to treat groundwater impacted by chlorinated volatile organic compounds (CVOCs), most notably trichloroethene (TCE). Each barrier will consist of one row of permanent subsurface injection wells, with a total of 50 injection well locations across the FFP, LDS, and RDS properties (collectively referred to as the "Project Site", see Figure 3). The ISB reactive barriers will be oriented approximately perpendicular to the direction of groundwater flow to treat groundwater impacted with CVOCs. One reactive barrier will be located on the FFP property, three reactive barriers will be located on the LDS property, and two reactive barriers will be located on the RDS property. The injection wells will be installed on 25-foot centers, and the reactive barriers will range from 125 to 425 feet in length. The injection wells will be constructed with 4-inch diameter polyvinyl chloride (PVC) casing and screen, with screen intervals located within three defined subsurface zones defined by their depth below ground surface, namely at approximately 20-35 feet below ground surface (bgs; Zone A), 40-55 feet bgs (Zone B), and 60-75 feet bgs (Zone C).

Up to four injection events are anticipated at approximately two-year intervals, spanning a period of seven years, using mobile equipment present at the Project Site only during the injection events. Each injection event will consist of injection carbon amendment, dual valent iron (DVI), and *Dehalococcoides* (*Dhc*) microbial culture to facilitate ISB. The initial injection event will consist of injection at each of the 50 new injection well locations as well as seven existing injection well locations to treat the following areas (as shown in Figure 3):

1. Combined Core Impact Area: areas where concentrations of TCE in groundwater have been reported at greater than 1,000 micrograms per liter ($\mu\text{g/L}$).
2. Containment Area: the area east of the existing commercial building located on the RDS property and west of the eastern RDS property line where concentrations of TCE in groundwater have been reported between 5 $\mu\text{g/L}$ and 1,000 $\mu\text{g/L}$.

Subsequent injection events may be reduced in scope based on groundwater monitoring results.

The carbon amendment for injection would likely include components for short-term fermentation (e.g., lactate) and components for longer-term fermentation (e.g., emulsified vegetable oil [EVO]). The carbon amendment would also likely contain a phosphate buffer to control pH and micronutrients to promote bioremediation. Additionally, *Dhc* microorganisms would be injected (i.e. bioaugmentation) to introduce or increase *Dhc* bacterial populations for bioremediation.

The current groundwater monitoring well network consists of nine monitoring well locations with well screens in Zone A and 16 monitoring well locations in Zone B. Additional monitoring wells will be installed both laterally and vertically within the plume to monitor remedy performance at locations to be determined. Approximately 15 new well screens will be developed in Zones A, B and C. Multi-depth soil vapor probes in the Core Impact Area will also be installed on the RDS property.

Project Activities to be Conducted under DTSC's Oversight:

Potable Water Injection Test

Potable water injection testing will be conducted as an initial phase of pre-design data collection to evaluate the capacity of Zones A and B to receive injected water and provide information concerning expected injection rates under pressure as part of an amendment injection program. Potable water injection testing of Zone C is considered unnecessary, based on the favorable results of December 2016 ISCO pilot testing.

Pilot Test

As a second phase of pre-design data collection subsequent to potable water injection testing, it is anticipated that a pilot test will be conducted consisting of injection of carbon amendment, DVI, and Dhc within the Core Impact Area.

Pilot test injection will be conducted at two locations approximately 20 feet away from each other perpendicular to the flow direction. One downgradient location approximately 20 feet away from the two injection locations will be used for pilot test monitoring. The well triplets within the two pilot test injection locations and one monitoring well location will be screened in all three zones, from approximately 20 to 35 feet bgs, 40 to 55 feet bgs, and 60 to 75 feet bgs.

Evaluation of the efficacy of the pilot test injection event will be based on the results of post-injection groundwater monitoring at one monitoring location approximately 20 feet downgradient of injection well locations. Four post-injection groundwater monitoring events are anticipated at intervals of one month, two months, three months, and six months following pilot test injection.

Injection Well Drilling and Installation

Boreholes for injection wells will be drilled using hollow stem auger drilling methodology. Once each borehole is completed, injection wells will be constructed using 4-inch diameter Schedule 80 PVC well casing, with a 15-foot well screen (0.020-inch slot size screen) installed at approximate depths of 20 to 35 feet (Zone A), of 40 to 55 feet bgs (Zone B), and of 60 to 75 feet bgs (Zone C). A filter pack consisting of No. 3 sand or equivalent will be placed surrounding each injection interval well screen from the bottom of the screen to approximately one foot above the top of the screen. Above the Zone B and Zone C injection intervals, an approximate 3.5-foot layer of hydrated bentonite will be placed above the filter pack, with an approximate 0.5-foot layer of #3 sand or equivalent will be placed above the hydrated bentonite and be emplaced around the screened interval. Above the Zone A injection interval, a 2-foot layer of hydrated bentonite will be placed above the filter pack. The remainder of the annular space around the injection well casing will be sealed to the surface with Portland cement/bentonite grout. The injection wells will be finished at ground surface with traffic-rated utility boxes. Injection well drilling and installation is anticipated to take approximately 2 months.

Waste Management

Investigation derived wastes (IDW) (e.g., soil cuttings, decontamination water, and wastewater) generated during drilling activities will be placed into sealed DOT-rated 55-gallon drums and/or roll-off bins, as appropriate. The containers will be properly labelled, and temporarily staged in a designated area pending approval for subsequent disposal. Proper handling, sampling, profiling, transport, and disposal of all IDW will be coordinated and managed in accordance with appropriate state and federal regulations and guidelines.

Initial Full-Scale ISB Implementation

It is anticipated that the initial ISB injection event will consist of injecting approximately 400,400 pounds of carbon amendment and 25,800 pounds of DVI at 57 locations across the Project Site (50 new and seven existing locations for injection wells). Bioaugmentation would be conducted via injection of a preliminarily estimated 227 liters of Dhc microbial culture. A total of approximately 1,040,000 gallons of solution would be injected. The initial ISB injection event is anticipated to take approximately 2 months.

A Project Site-specific Health and Safety Plan (HASP) will be prepared to protect employees that may encounter impacted environmental media during planned field activities. All personnel will follow the guidelines, rules, and procedures contained in the HASP. At a minimum, the HASP will include identification of key personnel, an evaluation of hazards and associated controls, personnel training requirements, medical surveillance and recordkeeping requirements, personal protective equipment requirements, air monitoring/sampling procedures, spill response procedures, decontamination requirements, and an emergency response plan. Subcontractors will each be responsible for preparing their own HASP to protect the health and safety of their employees.

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

The Department of Toxic Substances Control (“DTSC”) approval is required for the overall remedy of the Site, while other public agencies may be involved through permitting or consultation.

A Waste Discharge Requirements (WDR) permit from the Los Angeles Regional Water Quality Control Board (LARWQCB) is required when injecting or discharging into the groundwater. The requirements of the WDR permit include discharger filing a Report of Waste Discharge (Water Board Form 200). A General WDR permit, consisting of Order No. R4-2014-0187 and Monitoring and Reporting Program No. CI-10283, was obtained for previous pilot studies. The authorized Injection Material Amendments listed in Order No. R4 2014-0187 include all proposed injection reagents, including carbon amendments, DVI, and Dhc. The existing WDR permit (originally obtained November 2016) will be updated for the extended injection area and change of injection reagents.

Drilling and well construction permits from the Los Angeles County Department of Environmental Health will be required for injection and monitoring wells.

A Rule 1166 Plan from the South Coast Air Quality Management District (SCAQMD) is required when excavating soil containing volatile organic compounds (VOCs) or when handling/storing VOC-contaminated soil (soil which registers 50 parts per million or greater using an organic vapor analyzer). A Rule 1166 Site-Specific Plan is required for this Project Site due to the location of a school within 1,000 feet. Per SCAQMD Rule 403, the project will implement dust control measures if project-related activities generate fugitive dust. SCAQMD Rule 1466 is not anticipated to apply to this project due to the quantity of metals-impacted soil to be generated during drilling activities (i.e. less than 50 cubic yards).

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

Assistance from DTSC’s Environmental Justice and Tribal Affairs office (EJTA) was requested to complete outreach to Native American tribes who may have knowledge of cultural resources in the project area on October 23, 2023. The State of California’s Native American Heritage Commission (NAHC) was contacted by DTSC’s EJTA Coordinator to conduct a search of the Sacred Land File (SLF) and to obtain a list of California Native American Tribes who may have knowledge of cultural resources within the project area. On November 30, 2023, the NAHC responded. The results of the SLF were negative. On June 3, 2024, outreach letters were emailed to 10 individuals, representing 7 different Tribes. A representative from one of the Tribes responded to DTSC’s outreach on June 3, 2024, and asked for more information about the project and requested a copy of the cultural resource report. Subsequent communication with aforementioned Tribal representative indicated there were concerns due to the proximity of the project to known cultural sites. As discussed in Section 18, Tribal Cultural Resources, mitigation measures have been incorporated as part of this Initial Study to reduce the potential risk of impacts from inadvertent discoveries of resources to a less than significant level.

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Figure 2 – Project Site Plan and Vicinity

Figure 3 – Bioremediation and Core Impact and Containment Areas

APPENDICES

Appendix A – Air Quality Data

Appendix B – Biological Resources Data

Appendix C – Phase I Cultural Resources Study

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

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

DETERMINATION

On the basis of this initial evaluation:

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

CERTIFICATION

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

MONTH DAY, 2026

_____ Preparer's Signature		_____ Date
_____ Scarlett Zhai Preparer's Name	_____ Supervising Hazardous Substances Engineer Preparer's Title	_____ (714) 484-5316 Phone #
_____ Branch or Unit Chief Signature		_____ Date
_____ Shahir Haddad Branch or Unit Chief Name	_____ Branch Chief, Cypress Branch or Unit Chief Title	_____ (714) 484-5368 Phone #

EVALUATION OF ENVIRONMENTAL IMPACTS

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

ENVIRONMENTAL IMPACT ANALYSIS

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

IMPACT ANALYSES AND CONCLUSIONS:

Except as provided in Public Resources Code Section 21099, would the project:

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

Impact Analysis:

FFP is approximately 2.3 acres in size and is located on the south side of Artesia Boulevard, between Van Ness Avenue to the west, and Western Avenue to the east (Figures 1 and 2). FFP and adjacent properties are located in a mixed industrial-commercial-residential area in Torrance, California. Across Artesia Boulevard, north of FFP, are apartments and commercial businesses. To the east of FFP are the LDS and RDS properties. A condominium complex and single-family residences are located west of and adjacent to FFP. The property located south of and adjacent to FFP is a commercial nursery (Kubota Growers), which is leased from, and coincident with, an SCE power line right-of-way.

The installation of injection wells at 50 locations on the FFP, LDS, and RDS properties are all subsurface wells with no aboveground features, and as such would not have a substantial adverse effect on the visual character of the area. All properties within the Project Site will be returned to their original condition once construction activities are completed. The project would be similar to the existing Project Site industrial uses and the industrial uses in the vicinity. Therefore, implementation of the proposed project would have no impact on scenic vistas.

Conclusion: No impact.

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

Impact Analysis:

There are no state scenic highways located in the vicinity of the Site. The Site itself consists of urbanized industrial development and does not contain any scenic resource features.

Conclusion: No impact.

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

Impact Analysis:

According to CEQA Guidelines Section 15387, urban areas are defined as a central city or group of contiguous cities with a population of 50,000 or more, together with adjacent densely populated areas having a population density of at least 1,000 persons per square mile (U.S. Census, 2012). According to the 2010 Census Urbanized Area Reference Map, the Project site is located within an urbanized area. As such, the potential impacts of the project under this threshold are assessed based on whether the project would conflict with applicable zoning and other regulations governing scenic quality.

The Project Site is located in an urbanized area with mixed industrial-commercial-residential uses in Torrance, California. FFP and LDS are zoned as a Light Manufacturing Zone (M1) and RDS is zoned as a Heavy Manufacturing Zone (M2). The proposed project involves the addition of subsurface injection wells at 50 locations and does not entail the construction of new buildings or other structures. Any above-ground equipment usage is temporary during well installation and/or injection events. Because the Project Site and its surroundings are already urbanized, these changes would not alter the visual character or the quality of public views of the Project Site and its surroundings. Based on review of the Torrance Municipal Code and City of Torrance General Plan (which include zoning regulations and policies concerning visual characteristics of development), no conflicts with applicable zoning or other regulations governing scenic quality have been identified. Therefore, project impacts will have no impact with respect to degradation of visual character and quality.

Conclusion: No impact.

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

Impact Analysis:

The proposed project involves the addition of subsurface injection wells at 50 locations and no new light sources. The Project Site and its surroundings are located in an urbanized environment with high levels of nighttime lighting and lacking light sensitive receptors. Nighttime operations are not proposed to change as a result of this project. There would not be a significant change in light or glare emanating from the Project Site. Therefore, no impact would occur on day or nighttime views.

Conclusion: No impact.

References Used:

City of Torrance. April 6, 2010. *City of Torrance General Plan*. Accessed from:
<https://www.torranceca.gov/Government/Departments-Offices/Departments-Offices/Community-Development/Planning-Division/Comprehensive-Planning/General-Plan>

City of Torrance Property Zoning Map. Available:
<https://www.torranceca.gov/files/assets/city/v/1/government/community-development/doc-files/gis/zoning-map-may2026.pdf>

Google Maps. Satellite and Street-View imagery of 2040, 2000, and 1942 Artesia Boulevard, Torrance, CA 90504.
<http://www.google.com/maps> (Accessed March 2025 through May 2026)

2. AGRICULTURE AND FORESTRY RESOURCES

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board.

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

IMPACT ANALYSES AND CONCLUSIONS:

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?

Impact Analysis:

There is no farmland located on or near the project site. Per review of the Department of Conservation's Important Farmland Maps, the Site and surrounding area consist entirely of lands classified as Urban and Built-Up Land.

Conclusion: No impact.

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

Impact Analysis:

No conflicts would result from the project. The Site is not zoned for agricultural and is not subject to a Williamson Act contract.

Conclusion: No impact.

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

Impact Analysis:

The Project Site is not designated or zoned for forest land, nor does it occur near forested areas. Therefore, there are no conflicts with existing zoning or forest use.

Conclusion: No impact.

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

Impact Analysis: See response 2(c) above.

Conclusion: No impact.

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

Impact Analysis:

As discussed in section 2(a) through 2(d) above, the project is not located in an environment where agricultural or forest land uses are present, thus implementation of the project does not entail any risk of such land conversions.

Conclusion: No impact.

References Used:

California Department of Conservation. 2024. California Important Farmland Finder. Accessed from: <http://maps.conservation.ca.gov/dlrp/ciff/>

United States Department of Agriculture. 2024. Web Soil Survey. Accessed from: <https://websoilsurvey.nrcs.usda.gov/app/WebSoilSurvey.aspx>

3. AIR QUALITY

Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations.

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

IMPACT ANALYSES AND CONCLUSIONS:

Would the project:

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

Impact Analysis:

The Project Site is located within the jurisdiction of the South Coast Air Quality Management District (SCAQMD). The SCAQMD is required by law to prepare a comprehensive district-wide Air Quality Management Plan (AQMP) which includes strategies to reduce emission levels to achieve and maintain state and federal ambient air quality standards, and to ensure that new sources of emissions are planned and operated to be consistent with the SCAQMD's air quality goals. On December 2, 2022, the SCAQMD Governing Board adopted the 2022 AQMP.

Project activities involve the installation of injection wells at 50 locations over an approximate two-month period, conducting injection events, and conducting abandonment of the wells. The installation and abandonment activities may pose short-term impacts on the local community, including dust from drilling, equipment and vehicle emissions, and traffic impacts to the neighboring properties. These short-term impacts can be addressed through implementation of certain measures including standard dust control and adherence to the Project Site-specific HASP. Further, the project is required to comply with all requirements of SCAQMD's fugitive dust control requirements under Rule 403, which would also control short-term fugitive dust emissions. The project's implementation and operation are not expected to pose significant long-term impacts to the community or environment.

The goal of the project is to help remediate contamination at the existing Project Site. The proposed project would not obstruct or conflict with implementation of the SCAQMD 2022 AQMP.

Conclusion: Less than significant impact.

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

Impact Analysis:

The United States Environmental Protection Agency, California Air Resources Board (CARB), and SCAQMD have established air monitoring plans designed to obtain representative data on the ambient levels of pollutants. This data is used to classify an area as attainment, unclassified, or nonattainment, depending on whether the monitored ambient air quality data indicates compliance, sufficient data is not available, or non-compliance with the ambient air quality standards, respectively. The Project Site is located in the South Coast Air Basin (SCAB), which is nonattainment for the federal and state ozone standard, the federal and state standards for particulate matter less than 2.5 microns (PM_{2.5}), and the California standard for particulate matter less than 10 microns (PM₁₀). The SCAB is designated as attainment or unclassified for federal standard for PM₁₀, carbon monoxide (CO), nitrogen dioxide (NO₂), and sulfur dioxide (SO₂).

In order to establish if a project could cause a significant contribution to ambient air quality, SCAQMD has established air quality significance thresholds for project operation and construction. Construction phase emissions at the Project Site will mainly consist of emissions from material movement due to well drilling, off-road construction equipment, and on-road construction worker, vendor, and hauling vehicles. Operational emissions for the proposed project are expected to be comprised of a negligible number of Ramboll and contractor trips to the Project Site and the operation of one diesel generator to power injection activities (e.g., pumps and ancillary equipment).

Potential air emissions associated with the project's construction phase activities were estimated using the California Emissions Estimator Model (CalEEMod®). Construction phase emissions will be short-term and anticipated to occur over a roughly two-month period during well construction and installation, and a one-month period during well abandonment following remediation. Project-specific inputs were used for construction phases and durations, equipment mix, material movement, and on-road trips, as shown in the output files presented in Appendix A.

The maximum daily criteria air pollutant emissions estimated due to construction activities are summarized in Table 1 below. The estimated emissions show that the regional daily emissions for construction are less than the SCAQMD mass daily significance thresholds for all criteria pollutants. The estimated emissions also show that the on-site daily emissions for construction are less than the localized significance thresholds for applicable criteria pollutants for a 1-acre site for a 25-m sensitive receptor distance from the Project Site boundary. Since the project impacts are minimal and temporary in nature, they will not contribute to a cumulative impact at the Project Site.

Table 1. Maximum Daily Construction Emissions						
	Maximum Daily Emissions (lb/day)					
	NO_x	VOC	PM₁₀	PM_{2.5}	SO_x	CO
Total Project Construction	0.91	0.17	0.14	0.06	0.01	11.2
Mass Daily Threshold ¹	100	75	150	55	150	550
Above Mass Daily Threshold?	No	No	No	No	No	No
On-Site Project Construction	0.75	--	0.035	0.075	--	10.7
Localized Significance Threshold ²	91	--	5	3	--	664
Above Localized Significance Threshold?	No	--	No	No	--	No
Notes: NO _x – nitrogen oxides SO _x – sulfur oxides ¹ Mass daily significance thresholds obtained from SCAQMD Air Quality Significance Thresholds. Available at: https://www.aqmd.gov/docs/default-source/ceqa/handbook/south-coast-aqmd-air-quality-significance-thresholds.pdf?sfvrsn=25 . Accessed: September 2024. ² Localized significance thresholds obtained for Southwest Coastal LA County (Source-Receptor Area 3), 1-acre site, 25-m receptor distance from the site boundary from SCAQMD Appendix C - Mass Rate LST Look-up Tables. Available at: https://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/appendix-c-mass-rate-lst-look-up-tables.pdf?sfvrsn=2 . Accessed: September 2024.						

Potential air emissions associated with the project's operation phase activities were estimated using the California Emissions Estimator Model (CalEEMod®). Operational phase emissions associated with sampling and monitoring mobile trips to/from the Project Site and operation of injection equipment will occur sporadically throughout the anticipated 20-year remediation period. The project will comply with all requirements of SCAQMD Rule 1166, Volatile Organic Compound Emissions from Decontamination of Soil, during well construction and remediation activities. Project-specific inputs were used for the trip rates, fleet mix, and the diesel generator, as shown in the output files presented in Appendix A.

The maximum daily criteria air pollutant emissions estimated due to operation of the project are summarized in Table 2 below. The estimated emissions show that the regional daily emissions for operation are less than the SCAQMD mass daily significance thresholds for all criteria pollutants. The estimated emissions also show that the on-site daily emissions for operation are less than the localized significance thresholds for applicable criteria pollutants for a 1-acre site for a 25-m sensitive receptor distance from the Project Site boundary. Since the project impacts are minimal, they will not contribute to a cumulative impact at the Project Site.

Table 2. Maximum Daily Operation Emissions						
	Maximum Daily Emissions (lb/day)					
	NO_x	VOC	PM₁₀	PM_{2.5}	SO_x	CO
Total Project Operations	1.3	0.14	0.1	0.05	0.005	1.5
Mass Daily Threshold ¹	55	55	150	55	150	550
Above Mass Daily Threshold?	No	No	No	No	No	No
On-Site Project Operations	1.22	0.13	0.03	0.03	0.005	1.32
Localized Significance Threshold ²	91	--	1	1	--	664
Above Localized Significance Threshold?	No	No	No	No	No	No
Notes: ¹ Mass daily significance thresholds obtained from SCAQMD Air Quality Significance Thresholds. Available at: https://www.aqmd.gov/docs/default-source/ceqa/handbook/south-coast-aqmd-air-quality-significance-thresholds.pdf?sfvrsn=25 . Accessed: September 2024. ² Localized significance thresholds obtained for Southwest Coastal LA County (Source-Receptor Area 3), 1-acre site, 25-m receptor distance from the site boundary from SCAQMD Appendix C - Mass Rate LST Look-up Tables. Available at: https://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/appendix-c-mass-rate-lst-look-up-tables.pdf?sfvrsn=2 . Accessed: September 2024.						

Conclusion: Less than significant impact.

c. Expose sensitive receptors to substantial pollutant concentrations?

Impact Analysis:

As discussed above and shown in Table 1, the maximum daily criteria air pollutant emissions estimated due to construction activities are less than the localized significance thresholds for applicable criteria pollutants for a 1-acre site for a 25-m sensitive receptor distance from the Project Site boundary, which are the most conservative thresholds. Localized significance thresholds represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standards and are developed based on the ambient concentrations of that pollutant for each source receptor area and distance to the nearest sensitive receptor. The most notable toxic air contaminant is diesel particulate matter during the construction phase, which is only expected to last 2 months. Therefore, emissions from project construction will not expose sensitive receptors to substantial pollutant concentrations.

Operational emissions for the proposed project are expected to be negligible, as work trips to/from the Project Site and operation of diesel-fueled injection equipment will occur infrequently over the course of remediation. Therefore, emissions from project operation will not expose sensitive receptors to substantial pollutant concentrations.

Conclusion: Less than significant impact.

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

Impact Analysis:

Construction equipment is typically fueled by diesel, which could lead to odors. However, diesel-fueled construction equipment is required by regulation to use low sulfur content fuel in accordance with SCAQMD Rule 431.2. Compliance with this rule will minimize potential odors. Given the intermittent and temporary nature of construction activities, potential odors are not expected to be discernible to off-site receptors. Diesel trucks that would be operated as part of construction or operational activities would not be allowed to idle longer than five minutes in any one location, in accordance with the CARB idling Airborne Toxics Control Measure (13 CCR §2485). Staging would be limited to areas designated by the City Public Works director to minimize impacts on residences and neighboring business operations or traffic. Therefore, construction equipment and haul trucks are not expected to

generate diesel exhaust odor greater than typically present at the Project Site. Therefore, the proposed project would not generate objectionable odors affecting a substantial number of people and there would be no impact.

Conclusion: Less than significant impact.

References Used:

CAPCOA. 2021. California Emissions Estimator Model. Available at: <http://www.aqmd.gov/caleemod/home>. Accessed: September 2024.

National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS) Attainment Status for South Coast Air Basin. Available at: <https://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/naaqs-caaqs-feb2016.pdf?sfvrsn=2>. Accessed: September 2024.

Ramboll US Corporation. January 2025. "Avnet – CEQA Initial Study: Average Trips per Day Detailed Report" (Appendix A)

SCAQMD Final 2022 Air Quality Management Plan. Available at: <https://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2022-air-quality-management-plan/final-2022-aqmp/final-2022-aqmp.pdf?sfvrsn=16>. Accessed: September 2024.

SCAQMD Rule 431.2. Sulfur Content of Liquid Fuels. Available at: <https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-431-2.pdf>. Accessed: September 2024.

SCAQMD. Rule 1166. Volatile Organic Compound Emissions from Decontamination of Soil. Available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1166.pdf>. Accessed: September 2024.

13 CCR §2485. Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling. Available at: https://www.arb.ca.gov/msprog/truck-idling/13ccr2485_09022016.pdf. Accessed: September 2024.

4. BIOLOGICAL RESOURCES

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

IMPACT ANALYSES AND CONCLUSIONS:

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 Game or U.S. Fish and Wildlife Service?

Impact Analysis:

The Project Site is currently completely developed with buildings, parking lots, and several turfed areas. The proposed project would not increase the amount of paved area at the Project Site. Research conducted for the Initial Study included queries to the following databases: Critical Habitat for Threatened and Endangered Species (USFWS 2024) California Natural Diversity Database [CNDDDB; California Department of Fish and Wildlife (CDFW) 2024], and Information for Planning and Consultation [IPaC; United States Fish and Wildlife Service (USFWS) 2024]. No critical habitat exists in the proposed project's vicinity. One species was identified based on the CNDDDB query, and ten species were identified during the IPaC query (see Appendix B). However, these identified species are not anticipated to occur due to the heavily urbanized area and lack of suitable habitat overlapping and

surrounding the Project Site. Therefore, no habitat loss would occur, and the project would have no impact on any species identified as a candidate, sensitive, or special status species.

Conclusion: Less than significant impact.

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

Impact Analysis:

The Project Site is commercial and within an urban setting that lacks vegetation suitable for habitat to sensitive species. The Project Site does not include any riparian or sensitive natural communities. No impact to riparian or sensitive natural communities would occur with implementation of the proposed project.

Conclusion: No impact.

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

Impact Analysis:

The Project Site is currently fully developed. A review of the National Wetlands Inventory (NWI) Map (USFWS 2024) shows no wetlands located at the Project Site. A concrete channel exists approximately 400 feet east of the eastern border of the RDS property boundary (i.e., the Dominguez Channel). However, the channel is concretized and is not likely to be affected by the proposed project. Further development of the Project Site would have no impact on federally protected wetland as defined by Section 404 of the Clean Water Act.

Conclusion: No impact.

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

Impact Analysis:

The proposed project would not interfere with the movement of any native resident or migratory fish or wildlife species or affect any nursery sites as compared to the current site conditions. The Project Site is fully developed and does not provide for any substantial movement or nursery habitat. No impact would occur.

Conclusion: No impact.

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

Impact Analysis:

The proposed project would not conflict with any local policies or ordinances protecting biological resources. No vegetation, including trees, would be removed through the implementation of the project. Therefore, no impact would occur.

Conclusion: No impact.

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

Impact Analysis:

The Project Site is not within the area of any adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. Therefore, no impact would occur.

Conclusion: No impact.

References Used:

California Department of Fish and Wildlife (CDFW). 2024. California Natural Diversity Database (CNDDDB). Accessed: <https://wildlife.ca.gov/Data/CNDDDB>

United States Fish and Wildlife Service. October 17, 2024. Information for Planning and Consultation (“IPaC”) correspondence and worksheet. (Appendix B)

United States Fish and Wildlife Service. 2024. National Wetlands Inventory. Available at: <https://www.fws.gov/wetlands/data/mapper.html>

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

A Phase I Cultural Resources Study which was prepared to help evaluate potential impacts to cultural resources is included as Appendix C to the Initial Study.

IMPACT ANALYSES AND CONCLUSIONS:

Would the project:

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

Impact Analysis:

There are no designated historic buildings on the Project Site and the project is not located in a historic district. The closest historic sites are the Pacific Electric Railroad Bridge (located 2.31 miles south) and Fern Avenue School (located 2.67 miles southwest), respectively, of the southern border of the Project Site.

As part of this Initial Study, a Phase I Cultural Resources Study was prepared to help evaluate potential impacts to cultural resources. As mentioned in the study, the buildings located at 2040 and 1942 Artesia Boulevard are over 50 years old and therefore potentially eligible for inclusion in the CRHR, but these buildings will not be impacted by the addition of the new injection wells or other activities associated with the proposed project. Therefore, no impact would result from the project.

Conclusion: No impact.

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

Impact Analysis:

The Project Site has been previously developed with buildings; therefore, the likelihood that intact archeological resources are present is low. Because the Project Site has been developed previously, any surficial archeological resources that may have been present at one time have likely been disturbed. Therefore, the topmost layers of soil at the Project Site are not likely to contain substantive fossils. In addition, the injection well boreholes will be approximately 12 inches in diameter and will therefore disturb a small area. In the unexpected event an unanticipated archeological resource is encountered, the contractor would stop work and notify local authorities of the finding.

As discussed in Section 18, Tribal Cultural Resources, information acquired during DTSC's tribal consultation process indicated the proposed project could result in potentially significant impacts to tribal cultural resources (i.e., a type of subsurface archeological resources) unless appropriate measures are incorporated to mitigate risks to an acceptable level. Measures identified during the tribal consultation process include tribal monitoring, cultural resources training for Site workers, measures for unanticipated discovery of Tribal Cultural Resources, and measures for inadvertent discovery of human remains. These measures align with guidance provided in the Phase I Cultural Resources Survey regarding unanticipated discovery of archaeological resources. Therefore, with

implementation of MMs TCR-1 through TCR-4, the potential for impacts on undiscovered subsurface archeological resources would be mitigated to a less than significant level.

Mitigation Measures:

Implement MMs TCR-1 through TCR-4 (refer to Section 18, Tribal Cultural Resources)

Conclusion: Less than significant impact with mitigation incorporated.

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

Impact Analysis:

The Project Site and has been previously developed with buildings, and the Site vicinity has been subject to ground disturbance from other urbanized development. There are no known human remains on or near the Project Site, and given the repeated disturbance of the Site and the surrounding area, the potential for such remains to be present is considered extremely low. Existing regulations mandate that, in the event that human remains are encountered, the contractor would stop work and notify local authorities of the findings. Project activities will occur in accordance with all appropriate state and federal regulations and guidelines, including the California Health and Safety Code Section 7050.5 and Public Resources Code Section 5097.98.

In addition to the above, as part of the tribal consultation process for this project, mitigation measures have been identified to protect against potentially significant impacts involving inadvertent discovery of Native American human remains. (See discussion in Section 18, Tribal Cultural Resources.) With implementation of MM TCR-4, potential impacts involving disturbance of human remains would be mitigated to a less than significant level.

Mitigation Measures:

Implement MMs TCR-1 through TCR-4 (refer to Section 18, Tribal Cultural Resources)

Conclusion: Less than significant impact with mitigation incorporated.

References Used:

Applied Earthworks. June 2025. *Phase I Cultural Resources Study for the Former Freeman Products In-Situ Bioremediation Project Torrance, Los Angeles County, California*

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

IMPACT ANALYSES AND CONCLUSIONS:

Would the project:

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

Impact Analysis:

Energy uses for the scope of work include use of machinery for drilling boreholes, transportation of machinery and materials to and from the Project Site, and transportation related to waste handling and disposal in accordance with appropriate state and federal regulations and guidelines. Construction impacts are considered to be industry standard and not wasteful. During the operational phase of the project, one diesel generator will be used to power injection activities (e.g., pumps and ancillary equipment). Overall, energy consumption will mostly occur during construction and during a limited portion of the operational phase. The proposed project's implementation would not result in the addition of new facilities that would necessitate energy resources. Therefore, any impacts pertaining to consumption of energy resources would be less than significant.

Conclusion: Less than significant impact.

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

Impact Analysis:

In 2015, Governor Jerry Brown signed Senate Bill 350, establishing formal goals for climate action, clean energy, and energy efficiency in California. The regulations emphasize renewable energy generation and improving building energy efficiency. In 2017, the City of Torrance released a Climate Action Plan, highlighting various energy efficiency regulations and initiatives for buildings and charging stations at parking facilities. It emphasizes retrofitting residential buildings built before 1978 to improve energy efficiency and reduce GHG emissions and adding electric vehicle charging infrastructure at multifamily and nonresidential developments. The proposed project would not lead to the construction of new buildings or facilities, thus not increasing energy demand. As such, the project would not interfere with state or local renewable energy or energy efficiency plans.

Conclusion: No impact.

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

IMPACT ANALYSES AND CONCLUSIONS:

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? Refer to Division of Mines and Geology Special Publication 42.
 - ii) Strong seismic ground shaking?
 - iii) Seismic-related ground failure, including liquefaction?

iv) Landslides?

Impact Analysis:

Per the City of Torrance General Plan (2009), Torrance is located close to multiple fault zones, making it susceptible to tectonic activity. The most significant seismic threats are posed by the Palos Verdes fault zone, the Puente Hills fault, the Newport-Inglewood fault zone, the Elysian Park fault zone, along with the Malibu Coast-Santa Monica-Hollywood fault zone, and the Whittier fault zone. The faults identified within Torrance are primarily confined to areas south of the Pacific Coast Highway (i.e., 5+ miles south of the Project Site). Exposure to seismic activity at the Project Site is no greater than other areas in Southern California.

As of 2009, Torrance did not designate any of the Alquist-Priolo Earthquake Fault Zones within its city limits. If the Palos Verdes fault becomes classified as active in the future, a segment of southern Torrance would be incorporated into an Alquist-Priolo Earthquake Fault Zone.

Per the California Department of Conservation Data Viewer, the Dominguez Channel (immediately right-adjacent to Momin Lodge) is designated as a liquefaction zone as of 1999.

While a strong seismic event on any other fault system in Southern California has the potential to create considerable levels of ground shaking throughout the City, proposed project activities are not anticipated to increase seismic ground shaking. Additionally, construction pertains to subsurface well installation, and therefore the Uniform Building Code does not apply to this scope of work. Therefore, project impacts would be less than significant.

Conclusion: No impact.

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

Impact Analysis:

Erosion is the movement of rock and soil from place to place. Erosion occurs naturally by agents such as wind and flowing water; however, grading and construction activities have the ability to greatly increase erosion if effective erosion control measures are not implemented. Common means of soil erosion from construction sites include water, wind, and being tracked off-site by vehicles.

The Project Site is in a highly urbanized, built-out area and its topography is largely flat. The Project Site has also been previously developed with buildings and concrete/asphalt paved areas. There may require a minimal amount of earthwork activity for well installment; however, the project is not anticipated to result in substantial soil erosion or the loss of topsoil. Therefore, impacts would be less than significant.

Conclusion: Less than significant impact.

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

Impact Analysis:

The Project Site is not located in an area susceptible to landslide. While the Dominguez Channel liquefaction zone is located in close proximity to the Project Site, the project activities are not expected to result in liquefaction, or an off-site landslide, lateral spreading, subsidence, or collapse. Therefore, impacts would be less than significant.

Conclusion: Less than significant impact.

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

Impact Analysis:

Expansive soil, composed of fine-grained clay, is prevalent throughout much of North Torrance and the Watteria Lake region in Southwest Torrance. This type of soil typically arises in regions that were once flood plains or lake beds. The Project Site is located in an Expansive Soil Area; however, the area is already developed and project activities are not anticipated to create substantial direct or indirect risks to life or property. Therefore, impacts would be less than significant.

Conclusion: Less than significant impact.

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

Impact Analysis:

The entire City of Torrance is served by an existing sewer system. No septic tanks or alternative wastewater disposal systems will be constructed on-Site as part of the proposed site remediation activities.

Conclusion: No impact.

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

Impact Analysis:

The Project Site has been previously developed with buildings; therefore, the likelihood that paleontological resources are present is very low. The Project Site is relatively flat and does not contain unique geologic features. Because the Project Site has been developed previously, any surficial paleontological resources that may have been present at one time have likely been disturbed. Therefore, the topmost layers of soil at the Project Site are not likely to contain substantive fossils. The project work consists of advancing borings for injection well installation and not large-scale excavation. The injection well boreholes will be approximately 12 inches in diameter and reach depths of approximately 75 feet deep and will therefore disturb a small area. In the unexpected event an unanticipated paleontological resource is encountered, and consistent with existing applicable laws and regulations, the contractor would stop work and notify local authorities of the finding. Therefore, impacts on paleontological resources or geologic features are expected to be less than significant.

Conclusion: Less than significant impact.

References Used:

California Department of Conservation Data. 2016. Landslide Susceptibility. Accessed from: <https://maps.conservation.ca.gov/cgs/lsi/>

City of Torrance. 2022. Expansive Soil Foundation Map for Residential Construction. Accessed from: <https://www.torranceca.gov/home/showpublisheddocument/73849/637860637861500000>

8. GREENHOUSE GAS EMISSIONS

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

Construction-related GHG emissions were estimated using the methodology discussed earlier under Section 3, Air Quality. Additional modeling details and assumptions are provided in Appendix A.

IMPACT ANALYSES AND CONCLUSIONS:

Would the project:

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

Impact Analysis:

On December 5, 2008, the South Coast Air Quality Management District (SCAQMD) adopted an interim CEQA Greenhouse Gas (GHG) Significance Threshold for projects where SCAQMD is the lead agency. This GHG interim threshold is set at 10,000 metric tons of CO₂ equivalent emissions (CO₂e) per year (MT/yr) for industrial projects, and 3,000 MT/yr CO₂e for residential and commercial projects. Projects with incremental increases below this threshold will not be cumulatively considerable.

Potential annual greenhouse gas emissions associated with the project's construction and operation phase activities were estimated using the California Emissions Estimator Model (CalEEMod®). Construction phase emissions will be short-term and anticipated to occur over a roughly two-month period during well construction and installation, and a one-month period during well abandonment following remediation. Construction will generate direct one-time GHG emissions through combustion of fuel in construction equipment and vehicles. Operational phase emissions associated with sampling and monitoring mobile trips to/from the Project Site and operation of injection equipment will occur sporadically throughout the anticipated 20-years remediation period. Project-specific inputs were used for construction phases and durations, equipment mix, and on-road trip rates and fleet mix, as shown in the output files presented in Appendix A.

As shown in Table 3, the project GHG emissions are well below the 10,000 MT/year CO₂e significance threshold. Additionally, annual operational emissions throughout the project may be less than what is presented based on the monitoring and sampling required in a given remediation year. Therefore, implementing the proposed project is not expected to generate significant adverse cumulative GHG air quality impacts.

Table 3. Construction and Operational Greenhouse Gas Emissions

Emission Source	Calendar Year	CO₂e Emissions (MT/year)
Construction Emissions	2025	30.5
	2045	22.3
	30-Year Amortized Emissions¹	1.8
Operational Emissions	Annual	9.8

Table 3. Construction and Operational Greenhouse Gas Emissions		
Emission Source	Calendar Year	CO₂e Emissions (MT/year)
Total (Construction + Operational)		11.6
SCAQMD Significance Threshold ²		10,000
Above Significance Threshold?		No
Notes: ¹ This approach to one-time construction GHG emissions is available at: https://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/ghgboardsynopsis.pdf?sfvrsn=2 . Accessed: September 2024. ² Mass daily significance thresholds obtained from SCAQMD Air Quality Significance Thresholds. Available at: https://www.aqmd.gov/docs/default-source/ceqa/handbook/south-coast-aqmd-air-quality-significance-thresholds.pdf?sfvrsn=25 . Accessed: September 2024.		

Conclusion: Less than significant impact.

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

Impact Analysis:

The project's proposed construction and operational activities' fuel use would generate GHG emissions. Since the project is consistent with SCAQMD's CEQA GHG Significance threshold, as discussed above, the project is not expected to generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment or conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

Conclusion: Less than significant impact.

References Used:

CAPCOA. 2021. California Emissions Estimator Model. Available at: <http://www.aqmd.gov/caleemod/home>. Accessed: September 2024.

Ramboll US Corporation. January 2025. "Avnet – CEQA Initial Study: Average Trips per Day Detailed Report" (Appendix A)

SCAQMD Interim CEQA GHG Significance Threshold for Stationary Sources, Rules and Plans, December 2008. Available at: [http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-\(ghg\)-ceqa-significance-thresholds/ghgboardsynopsis.pdf?sfvrsn=2](http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/ghgboardsynopsis.pdf?sfvrsn=2). Accessed: October 2024.

SCAQMD Final 2022 Air Quality Management Plan. Accessed from: <https://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2022-air-quality-management-plan/final-2022-aqmp/final-2022-aqmp.pdf?sfvrsn=16>.

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

IMPACT ANALYSES AND CONCLUSIONS:

Would the project:

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

Impact Analysis:

The project's purpose and need are to install injection wells at 50 locations across the Project Site and conduct ISB as part of the RAP to remediate site contamination, which will result in a benefit to the public and environment. No hazardous materials are expected to be handled during project activities (soil is expected to be non-hazardous and injection material is non-hazardous). There may be a potential for hazardous liquid to be generated in small quantities during project activities (e.g., purge water). Best management practices will be implemented to properly contain and store the liquid into sealed DOT-rated 55-gallon drums. The containers will be properly labelled, and temporarily staged in a designated area pending approval for subsequent disposal at a licensed facility such as Crosby & Overton, located in Long Beach, in accordance with applicable state and federal (i.e. Resource

Conservation and Recovery Act) regulations and guidelines. In addition, the proposed project would implement a HASP which would describe, in detail, how potential for exposures would be minimized for all personnel who enter the proposed Project Site and how migration of contaminated materials beyond the area would be prevented. Therefore, impacts would be less than significant due to the project.

Conclusion: Less than significant impact.

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

Impact Analysis:

The Site has an environmental history that includes contaminants in soils, soil vapor, and groundwater. As mentioned in the Background section of the Initial Study and section 3 of the FS/RAP, several environmental investigations have been conducted at the Site to date. The primary COPCs identified for the Site are trichloroethylene (TCE), tetrachloroethylene (PCE), and 1,1-dichloroethene (1,1-DCE) in all media, and 1,4-dioxane in groundwater only.

The project's purpose and need are to install injection wells at 50 locations across the Project Site and conduct ISB as part of the RAP to remediate contamination from historical industrial operations, which will result in a benefit to the public and environment. The RAP aims to treat the CVOs currently existing in the groundwater via injections of carbon amendment, DVI, and Dhc microbial culture to facilitate ISB. No hazardous materials are expected to be handled during project activities (soil is expected to be non-hazardous and injection material is non-hazardous). Design and implementation of the RAP is subject to review and regulation by DTSC, which ensures that the remedial activities will function as intended and avoid creating additional hazardous conditions or risk of upset. Therefore, impacts associated with the project would be less than significant.

Conclusion: Less than significant impact.

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

Impact Analysis:

The nearest existing schools are Arlington Elementary School and Casimir Middle School, located about 700 feet southwest and 1,200 feet northwest of the Project Site, respectively. The project's purpose and need are to install injection wells at 50 locations across the Project Site and conduct ISB as part of the RAP to remediate site contamination, which will result in a benefit to the public and environment through the remediation of contamination from historical industrial operations in accordance with all applicable laws, regulations and requirements. Additionally, no hazardous materials are expected to be handled during project activities (soil is expected to be non-hazardous and injection material is non-hazardous), and IDW will be properly contained, sampled, profiled, and taken to an appropriate disposal facility in accordance with state and federal regulations and guidelines. Therefore, impacts are not anticipated to occur.

Conclusion: Less than significant impact.

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

Impact Analysis:

California's list of hazardous materials compiled pursuant to Government Code Section 65962.5 (a.k.a. "the Cortese List"). The primary purpose of the Cortese List functions is to provide comprehensive, publicly accessible information about sites where hazardous waste or hazardous substances have been released or are present.

The following databases compiled pursuant to Government Code Section 65962.5 were checked (August 14, 2024) for known hazardous materials contamination at the Project Site, with results (if applicable) listed below:

- Comprehensive Environmental Response, Compensation, and Liability Information System database;
- GeoTracker search for leaking underground storage tanks (LUSTs);
- The DTSC's EnviroStor database (Hazardous Waste and Substances Site List [Cortese])
 - Freeman Products/Avnet Inc. (EPA ID: 60000835) has an active status as of February 29, 2008.
 - ALS Industries Incorporated (EPA ID: 60001257) has a status of "No Further Action" as of January 9, 2013.

The Cortese List includes DTSC's State Response sites, and the subject Site is a DTSC State Response site. While the Site appears on the Cortese List, the fundamental purpose of the subject project is to remediate existing hazardous conditions present at the Site which resulted in the Site appearing on the Cortese List. The project does not entail any new development or future operations apart from implementing the RAP.

The project's purpose and need are to install injection wells at 50 locations across the Project Site and conduct ISB as part of the RAP to remediate site contamination, which will result in a benefit to the public and environment through the remediation of contamination from historical industrial operations in accordance with all applicable laws, regulations, and requirements. The project is not expected to create a significant hazard to the public or environment as a result of being located on the sites listed above.

As such, implementing the project would not create a significant hazard to the public or the environment, and the project's impacts are considered less than significant.

Conclusion: Less than significant impact.

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

Impact Analysis:

The Project Site is located beyond two miles of any airport, with the closest airports, Hawthorne Municipal Airport, Torrance Municipal Airport, and Los Angeles International Airport, located 3.5, 4.6, and 5.5 miles northwest of the Project Site, respectively. No vertical structures will be added to the Project Site; therefore, air traffic patterns will not be affected. Therefore, no impact would occur due to the project.

Conclusion: No impact.

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

Impact Analysis:

The proposed project does not involve the development of structures that could potentially impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. Specifically, no aboveground structures will be added to the Project Site. Further, the HASP will be implemented in emergency response situations. The HASP includes contingency plans for spills, fires, or other emergencies during construction activities. The HASP would include a stop-work authority requirement for all work locations and workers and grants any worker the ability to stop work if an unsafe condition is identified that could cause substantial harm or imminent danger to health and safety of workers, the public, or the environment. As a result, if actions described in the HASP were to be implemented in response to an emergency, project management would be able to immediately suspend equipment operation until the emergency response is completed or the evacuation order is lifted. Therefore, no impact would occur due to the project.

Conclusion: No impact.

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

Impact Analysis:

The Project Site is located in a highly urbanized community and there are no wild lands in the vicinity. There would be no risk of exposing people or structures to a significant risk of loss, injury, or death involving wild land fires. Therefore, no impact would occur due to the project.

Conclusion: No impact.

References Used:

California Environmental Protection Agency. "Cortese List Background and History." Accessed from:
<https://calepa.ca.gov/sitecleanup/corteselist/Background/>

EnviroStor. FREEMAN PRODUCTS / AVNET INC. (60000835). Accessed from:
https://www.envirostor.dtsc.ca.gov/public/profile_report.asp?global_id=60000835

LA County Airport Land Use Commission (ALUC):
https://case.planning.lacounty.gov/assets/upl/project/ALUC_Airports_Aug2018_rev3.pdf

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

IMPACT ANALYSES AND CONCLUSIONS:

Would the project:

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

Impact Analysis:

The planned installation of new wells will include activities that disturb the earth, such as drilling. However, minimal earthwork is anticipated to install the injection wells, disturbing less than one acre of land. As such, a National Pollutant Discharge Elimination System permit is not required. The Project Site is already paved and developed, and project activities would not modify site features that would increase runoff. Additionally, on-site activities would require appropriate management measures, such as a Standard Urban Storm Water Mitigation Plan of the City of Torrance Municipal Code, to comply with pertinent water quality regulations.

Well installations will be performed using new PVC casing and clean annular materials. Each injection event will consist of injecting carbon amendment, including components for short-term fermentation (e.g., lactate) and components for longer-term fermentation (e.g., EVO), DVI, and Dhc microbial culture to facilitate ISB. The carbon amendment would also likely contain a phosphate buffer to control pH and micronutrients to promote bioremediation. The bioremediation program would remediate chlorinated solvents in groundwater and improve groundwater quality.

A WDR permit from the LARWQCB is required when injecting or discharging into the groundwater. The requirements of the WDR permit include discharger filing a Report of Waste Discharge (Water Board Form 200). A General WDR permit, consisting of Order No. R4-2014-0187 and Monitoring and Reporting Program No. CI-10283, was obtained for previous pilot studies. The authorized Injection Material Amendments listed in Order No. R4 2014-0187 include all proposed injection reagents, including carbon amendments, DVI, and Dhc. The existing WDR permit (originally obtained November 2016) will be updated for the extended injection area and change of injection reagents. Groundwater quality is monitored under the WDR permit, with threshold limits to constituents that are allowable in the groundwater. Discharge downgradient of the injection areas will be within the acceptable limits of the WDR permit. Additionally, in accordance with the Monitoring and Reporting Program, quarterly monitoring reports will be submitted to the LARWQCB to ensure that the project is in compliance with waste discharge requirements. Therefore, impacts would be less than significant.

Conclusion: Less than significant impact.

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

Impact Analysis:

The City of Torrance is within the West Coast Basin, and as of 1961 was an adjudicated groundwater basin. As such, it is exempt from developing a Groundwater Sustainability Plan.

Since the Project Site is currently developed, the amount of impervious surface would not change as a result of the project. No new impermeable surfaces would be created therefore no interference with groundwater recharge would occur. Additionally, the project's purpose and need are to install injection wells at 50 locations across the Project Site and conduct ISB as part of the RAP to remediate site contamination and improve water quality. As such, no impacts on groundwater are expected.

Conclusion: No impact.

- c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:
- i) Result in substantial erosion or siltation on or off site;
 - ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on-or off site;
 - 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?

Impact Analysis:

The Project Site is currently developed. The changes proposed by the project would not substantially change the drainage pattern of the Project Site or area and needed drainage system improvements would be incorporated in accordance with City requirements. Therefore, no impact on the existing drainage pattern resulting in erosion or siltation would occur.

Conclusion: No impact.

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

Impact Analysis:

The Project Site is located in Zone X of the FEMA FIRM (Map # 06037C1930F, September 26, 2008; and Map # 06037C1935F, September 25, 2008). Zone X is characterized as having a 0.2% chance for an annual flood. The proposed project would not increase exposure of housing to risks associated with flooding within a 100-year flood hazard area. According to the City of Torrance General Plan, the entire city, including the Project Site, is located in a moderate hazard area for tsunamis due to its proximity to several active offshore faults; however, the Project Site is located approximately 5.35 miles from the coastline. Therefore, a less than significant impact would occur.

Conclusion: Less than significant impact.

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

Impact Analysis:

The Project Site is located in the West Coast Basin, a groundwater basin exempted from developing a Groundwater Sustainability Plan because of its adjudication in 1961. Additionally, the Project Site is already paved so the proposed project would not increase the amount of impervious surface area on the Project Site. The Project Site is served by stormwater systems and the project would not increase the runoff going into those systems. Therefore, no changes to hydrology or water quality would occur.

The Project Site is currently developed. The changes proposed by the project would not substantially change the drainage pattern of the Project Site or area and needed drainage system improvements would be incorporated in accordance with City requirements. Additionally, the project's purpose and need are to install injection wells at 50 locations across the Project Site and conduct ISB as part of the RAP to remediate site contamination and improve water quality. Therefore, no impact to water quality or sustainable groundwater management plans are anticipated.

Conclusion: No impact.

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

IMPACT ANALYSES AND CONCLUSIONS:

Would the project:

- a. Physically divide an established community?

Impact Analysis:

The proposed project would not physically divide an established community, because it consists of the addition of injection wells at 50 total locations across already-developed properties. The basic use of the Project Site would not change. No impact would occur.

Conclusion: No impact.

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

Impact Analysis:

The Project Site is located in an area zoned for General Commercial (C-GEN), with immediately adjacent property to the south zoned as Public/Quasi-Public/Open Space (PUB), and surrounding property zoned as low (R-LO) to medium (R-HD) density residential. The project is not located in the coastal zone and is not subject to the Local Coastal Program. No changes to the General Plan land use or zoning designations are proposed or required. Therefore, the project would not conflict with any applicable land use plans and no impact would occur.

Conclusion: No impact.

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

IMPACT ANALYSES AND CONCLUSIONS:

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?

Impact Analysis:

The Project Site and surrounding properties are part of an urbanized area with no current oil or gas extraction. No mineral resource activities would be altered or displaced by the proposed project. Therefore, no impact would occur.

Conclusion: No impact.

- 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:

The Project Site and surrounding properties are part of an urbanized area with no current oil or gas extraction. No mineral resource activities would be altered or displaced by the proposed project. Therefore, no impact would occur.

Conclusion: No impact.

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

IMPACT ANALYSES AND CONCLUSIONS:

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?

Impact Analysis:

Construction noise impacts would be temporary, and construction contractors would be required to comply with Municipal Code requirements restricting hours of excessive noise generation. Project construction may involve the use of a CME-85 hollow stem auger drill rig on the Project Site. Additionally, loaded trucks carrying construction materials would operate on the Project Site during construction.

The average decibel (dB) level produced by a CME-85 hollow stem auger drill rig can vary based on numerous factors, such as the specific drilling operation, the condition of the equipment, the substrate being drilled, and the proximity of the measurement. Drill rigs like the CME-85 are heavy-duty equipment and typically produce levels of noise ranging between 80 to 100 dB within a 50-foot radius.

It should be noted that no person in the City of Torrance is permitted to use power construction equipment or conduct any exterior construction or repair work on edifices, structures, or projects near residential zones that results in noise exceeding 50 dB at the boundary lines outside the hours of 7:30 A.M. to 5:30 P.M. from Monday to Friday and 9:00 A.M. to 5:00 P.M. on Saturdays. As a result, construction noise and vibration would not be significant at these receptors because they would occur during weekdays and outside hours when people normally sleep, as well as for a temporary timeframe. Therefore, the project would not result in excessive ground-borne vibration or noise, and this impact would be less than significant. Therefore, the project would not result in exposure of persons to or generation of noise levels in excess of standards and this impact would be less than significant.

Conclusion: Less than significant impact.

- b. Generation of excessive groundborne vibration or groundborne noise levels?

Impact Analysis:

Project construction activities are anticipated to result in some vibration that may be felt on properties in the immediate vicinity of the Project Site, as commonly occurs with construction projects. The project may use a CME-85 hollow stem auger drill rig and involve trucks carrying construction materials, both of which contribute to noise on the site. The CME-85 drill rig can produce noise levels between 80 to 100 dB within a 50-foot radius, depending on various factors like drilling operation specifics and equipment condition.

Impacts from the project would be temporary, with contractors required to comply with Municipal Code restrictions on excessive noise generation hours. In Torrance, construction near residential zones cannot exceed 50 dB outside the hours of 7:30 AM to 5:30 PM on weekdays and 9:00 AM to 5:00 PM on Saturdays. Consequently, construction noise and vibration impacts would be minimal because activities are confined to daytime hours and are temporary. The project would not lead to excessive ground-borne vibration or noise beyond the standards, and this impact would be less than significant.

Conclusion: Less than significant impact.

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

Impact Analysis:

The Project Site is situated more than two miles away from any airport, with the closest airports, Hawthorne Municipal Airport, Torrance Municipal Airport, and Los Angeles International Airport, located 3.5, 4.6, and 5.5 miles northwest of the Project Site, respectively. Therefore, no impact associated with airport noise conflicts would occur.

Conclusion: No impact.

References Used:

City of Torrance Municipal Code, Chapter 6 – Noise and Torrance Muni Code Section 46.3.1.
<https://www.codepublishing.com/CA/Torrance/html/Torrance04/Torrance0406.html>

14. POPULATION AND HOUSING

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

IMPACT ANALYSES AND CONCLUSIONS:

Would the project:

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

Impact Analysis:

The project pertains to injection well installations across the site for remedial purposes, and therefore will not result in changes to land use, addition of facilities or housing units. As such, the project would not directly or indirectly induce population growth. The project will not generate any new permanent jobs. Therefore, there will be no impact on population growth.

Conclusion: No impact.

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

Impact Analysis:

There are no housing units on the Project Site or people residing on the Project Site in any form of temporary housing. The project activities will not displace any people, and as such would not necessitate the construction of replacement housing elsewhere. No impact would occur.

Conclusion: No impact.

15. PUBLIC SERVICES

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

IMPACT ANALYSES AND CONCLUSIONS:

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:

Implementation of the project activities will not result in any substantial adverse impacts to governmental facilities or the service ratios, response times, or other performance objectives of providing public services, such as fire protection, police protection, schools, parks, and other public facilities. The project activities will be implemented within the Project Site boundaries. Adherence to procedures and practices identified in the proposed project's HASP would reduce the potential for incidents to occur that would require a response from fire or police protection.

The planned activities will not impact the following resources:

- Fire protection as the land use before and after the project activities will remain the same;
- Police protection as the land use before and after the project activities will remain the same;
- Schools as the land use before and after the project activities will remain the same and will not increase the number of people in need of school services;
- Parks as the land use before and after the project activities will remain the same and will not create an increase in local population; or
- Other public facilities as the land use before and after the project activities will remain the same.

As such, additional services or facilities will not be required as a result of project's implementation.

Conclusion: No impact.

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

IMPACT ANALYSES AND CONCLUSIONS:

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

Impact Analysis:

The project does not involve construction of new parks or any other type of recreational facilities, and would not generate demand for any such facilities by introducing permanent workers or residents. The project would not directly affect any existing parks or create any new demand for parks or recreational facilities since it would not generate population growth; therefore, no impact on regional parks or recreational facilities would occur.

Conclusion: No impact.

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

Impact Analysis:

The project does not involve construction of new parks or any other type of recreational facilities; therefore, no impact would occur.

Conclusion: No impact.

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

IMPACT ANALYSES AND CONCLUSIONS:

Would the project:

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

Impact Analysis:

Construction activities would generate temporary construction-related traffic such as deliveries of equipment and materials to the Project Site and construction worker traffic. Construction traffic would be limited and temporary, and would not be substantial in relation to the existing traffic load and capacity of the street system. No conflicts with applicable congestion management programs have been identified. Additionally, no conflicts involving bicycle, pedestrian, or transit facilities have been identified, as the project would take place outside of the public right-of-way and does not require disruption of sidewalks, bike lanes, or transit stops or routes. Further, no additional traffic is expected post construction. Therefore, impacts would be less than significant.

Conclusion: Less than significant impact.

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

Impact Analysis:

CEQA Guidelines Section 15064.3(b) outlines criteria for analyzing transportation impacts, emphasizing vehicle miles traveled (VMT) as the primary measure. VMT is a measure used in transportation planning for a variety of purposes. It measures the amount of travel for all vehicles in a geographic region over a given period of time, typically a one-year period. VMT is calculated by adding all the miles driven by all the cars and trucks on all the roadways in a region. This metric plays an integral role in the transportation planning, policy-making, and revenue estimation processes due to its ability to indicate travel demand and behavior. VMT may also be used to evaluate conformity assumptions, adjust travel demand forecasts, and identify pavement maintenance needs.

Due to the nature of the proposed project not resulting in added housing units or facilities that may result in increased population, increased interaction with the site, or permanent jobs, vehicle traffic is not anticipated to change because of the project's implementation. Construction activities would generate temporary construction-related traffic such as deliveries of equipment and materials to the Project Site and construction worker traffic. The number of trips associated with these activities would be relatively limited and are not anticipated to conflict with

any applicable VMT threshold or otherwise be inconsistent with CEQA guidelines. Therefore, no impact would occur from the project.

Conclusion: No impact.

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

Impact Analysis:

The proposed project, which consists of on-site remedial activities to address soil contamination, does not involve any design features or incompatible uses that would substantially increase transportation-related hazards. Construction traffic would be temporary in nature and mainly occur along Artesia Boulevard, a multi-lane boulevard with vegetated traffic islands to partition the road. The project does not include, nor will it require, any permanent modifications to the transportation network. The proposed project would not introduce or encourage any incompatible land uses in the Project Site vicinity as it involves continuation of the current use. Therefore, the project would not increase hazards and no impact would occur.

Conclusion: No impact.

- d. Result in inadequate emergency access?

Impact Analysis:

The remedial activities would not affect emergency access to or from the Project site in the long-term because these activities would not substantially change the overall circulation system on- and off-site. During implementation of the proposed ISBR activities, construction traffic would mainly occur along Artesia Boulevard, a multi-lane boulevard with vegetated traffic islands to partition the road. The proposed project would not introduce or encourage any incompatible land uses in the Project Site vicinity as it involves continuation of the current use. Construction equipment will not impede fire and emergency access to the various properties while in operation or while staged on-site. Temporary displacement of parking will occur, particularly on the LDS property, and vehicles will use other spaces that do not block entrances or exits. Therefore, emergency access would be adequate, and no impact would occur.

Conclusion: No impact.

18. TRIBAL CULTURAL RESOURCES

Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (See Public Resources Code section 21083.3.2.) Information may also be available from the California Native American Heritage Commission's Sacred Lands File per Public Resources Code section 5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code section 21082.3(c) contains provisions specific to confidentiality.

Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	☐	☒	☐	☐
b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☒	☐	☐

A Phase I Cultural Resources Study which was prepared to help evaluate potential impacts to tribal cultural resources is included as Appendix C to the Initial Study.

IMPACT ANALYSES AND CONCLUSIONS:

- a. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:
- 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
 - A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resource Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

Impact Analysis:

As part of the process of preparing the RAP and the accompanying Initial Study, DTSC's Environmental Justice and Tribal Affairs office (EJTA) was requested to complete outreach to Native American tribes who may have knowledge of cultural resources in the project area. The State of California's Native American Heritage Commission (NAHC) was contacted by DTSC's EJTA Coordinator to conduct a search of the Sacred Land File (SLF) and to obtain a list of California Native American Tribes who may have knowledge of cultural resources within the project area. On November 30, 2023, the NAHC responded. The results of the SLF were negative. On

June 3, 2024, outreach letters were emailed to 10 individuals, representing 7 different Tribes. A representative from one of the Tribes responded to DTSC's outreach on June 3, 2024, and asked for more information about the project and requested a copy of the cultural resource report. Subsequent communication with aforementioned Tribal representative indicated there were concerns due to the proximity of the project to known cultural sites.

Through DTSC's tribal consultation process, Tribal representatives shared their knowledge of nearby Tribal Cultural Properties (TCPs). These include TCPs that were not documented in the California Historical Resource Information System. Based on information provided by EJTA as part of DTSC's tribal consultation process, the proposed project could result in potentially significant impacts to tribal cultural resources unless appropriate measures are incorporated to mitigate risks to an acceptable level. These measures include tribal monitoring, cultural resources training for Site workers, measures for unanticipated discovery of Tribal Cultural Resources, and measures for inadvertent discovery of human remains. These measures will also function to protect unanticipated discoveries of non-Tribal archaeological resources in the event they are encountered.

Mitigation Measures

MM TCR-1: Tribal Monitoring During Ground Disturbing Activities

- a. Prior to the commencement of ground disturbing activities, a Tribal Cultural Monitor(s) from or approved by consulting Tribe(s) shall be retained to monitor the Site for the presence of tribal cultural resources. Ground disturbing activities for the Project consist of pavement coring, hand auguring, and drilling.
- b. The Tribal Cultural Monitor(s) will provide daily monitoring during pavement coring and hand auguring activities. Hand auguring will be conducted from ground surface to approximately five feet deep. Soil cuttings from deeper drilling, conducted from approximately 5 to 75 feet below ground surface with a drill rig, will be spot checked as deemed appropriate by the Tribal Cultural Monitor(s). Monitoring may be reduced or halted at the discretion of the Tribal Cultural Monitor(s), in consultation with the consulting Tribe(s), the RP and DTSC or as warranted by conditions such as encountering bedrock or fill sediments.
- c. The Tribal Cultural Monitor(s) will complete daily monitoring logs for each day they are present on Site that will provide descriptions of relevant ground-disturbing activities and findings.
- d. The Tribal Cultural Monitor(s) will have the authority to halt and redirect work should any archaeological or tribal cultural resources be identified during monitoring. If archaeological or tribal cultural resources are encountered during ground disturbing activities, work within 100 feet of the find must halt and the find must be evaluated by a qualified archaeologist. A qualified archaeologist may be one who meets the Secretary of the Interior's Professional Qualification Standards for Archaeology or is listed on the Register of Professional Archaeologists.
- e. On-site tribal monitoring shall conclude upon the Tribe(s) receiving written confirmation from the designated point of contact for the Project Proponent that all ground disturbing activities and phases that may involve ground disturbing activities on the projects or in connection with the project, are complete.

MM TCR-2: Worker Cultural Resources Training

A worker cultural resources sensitivity program shall be implemented for the project. Prior to any ground-disturbing activity, an initial sensitivity training session shall be provided to all project employees, contractors, subcontractors, and other professionals prior to their involvement in any ground-disturbing activities, with subsequent training sessions occurring each quarter that ground-disturbing activities are performed, to accommodate new personnel becoming involved in the project. The sensitivity program shall address: the cultural (Native American, archaeological, and paleontological) sensitivity of the project site and a tutorial providing information on how to identify these types of resources; appropriate behavior; worker access routes and restrictions; work area cleanliness; specific procedures to be followed in the event of an inadvertent discovery; safety procedures when working with monitors; and consequences in the event of noncompliance. The Project Proponent shall notify DTSC and the Interested Tribes no less than two weeks prior to the training sessions. The program agenda and materials together with attendance rosters for the previous year shall be provided to DTSC and consulting Tribe(s).

MM TCR-3: Unanticipated Discovery and Inadvertent Discovery Plan

- a. If cultural resources of Native American origin are encountered during ground disturbing activities, all ground disturbing activities within 100 feet of the find shall cease until a qualified archaeologist can report to the site to assess the significance of the find. DTSC's Environmental Justice & Tribal Affairs office shall be notified within 24 hours of the discovery.
- b. Avoidance and preservation in place shall be the preferred manner of mitigating impacts to such resources, taking into consideration the project objectives of groundwater remediation, in order to maintain the important relationship between artifacts and their archaeological context and to preserve each resource's scientific value, as well as to preserve the cultural values ascribed to resources by the consulting Tribe(s). The feasibility of avoidance, as it relates to the project objectives of groundwater remediation, shall be determined by DTSC based on factors including groundwater contamination levels in coordination with consulting Tribe(s) and the Project Proponent.
- c. Avoidance shall be ensured by the delineation of Environmentally Sensitive Areas, including an area within 100 feet of the resource (unless a smaller buffer is agreed to between the qualified archaeologist, Tribal Cultural Monitor, Project Proponent, and DTSC), which shall be marked with exclusion markers. Protective fencing shall not identify the protected area as a cultural resource area in order to maintain location confidentiality.
- d. If the qualified archaeologist, in consultation with the consulting Tribe(s), determines that the resource is a Tribal Cultural Resource and thus significant under CEQA and/or the Tribe, they shall to prepare a Cultural Resource Treatment plan, which shall be implemented by the Project Proponent and/or its consultants in accordance with state guidelines and in consultation with the consulting Tribe(s). The Cultural Resource Treatment plan shall include guidelines on how to avoid the resource or, if avoidance of the resource is not feasible, the plan shall outline appropriate treatment of the resource in coordination with the consulting Tribe(s). Examples of appropriate mitigation for the Tribal cultural resources include, but are not limited to, protecting the cultural character and integrity of the resources, protecting traditional use of the resources, protecting the confidentiality of the resources, or heritage recovery.

TCR-4: Inadvertent Discovery of Human Remains

In the event of inadvertent discovery of human remains, all work shall be halted within a 100-foot radius and temporary protective measures shall be implemented. The County Coroner shall be notified immediately to evaluate the remains and follow the procedures and protocols set forth in Section 15064.4 (e)(1) of CEQA. DTSC shall also be notified of any inadvertent discovery of human remains within 24 hours of the discovery.

If the Coroner determines the remains are Native American in origin, the Coroner shall contact the NAHC. As provided in PRC Section 5097.98, the NAHC shall identify the person or persons believed to be most likely descended from the deceased Native American. The most likely descendent (MLD) shall be afforded the opportunity to provide recommendations concerning the future disposition of the remains and any associated grave goods as provided in PRC Section 5097.98. Per PRC Section 5097.98, the landowner shall ensure that the immediate vicinity, according to generally accepted cultural or archaeological standards or practices, where the Native American human remains are located, is not damaged or disturbed by further development activity until the landowner has discussed and conferred with the MLD regarding their recommendations, taking into account the possibility of multiple human remains.

There shall be no pictures taken or testing done on the Native American human remains. All bone, if not identifiable as human or animal, shall be treated as human remains and the appropriate protocols followed. The qualified archaeologist may recover scientifically valuable information, as appropriate and in accordance with the recommendations of the MLD and/or Tribal representative(s). Upon completion of the archeologist's assessment, a report will be prepared documenting methods and results, as well as recommendations regarding the treatment of the human remains and any associated archeological materials. The report shall be submitted to Project Proponent, the South Central Coastal Information Center, the consulting Tribe and DTSC. Tribal representatives shall be permitted to rebury the Native American human remains and associated funerary objects with the appropriate dignity, either in accordance with the recommendations of the MLD if available or in the project vicinity at a location agreed upon between the Tribe and the consultant, where the reburial would be accessible to Tribal members in perpetuity and would not be subject to further disturbance. The discovery and reburial is to be kept confidential and secure to prevent any further disturbance.

With implementation of mitigation measures TCR-1 through TCR-4 identified above, potential impacts would be reduced to a less than significant level.

Conclusion: Less than significant impact with mitigation incorporated.

References Used:

Applied Earthworks. June 2025. *Phase I Cultural Resources Study for the Former Freeman Products In-Situ Bioremediation Project Torrance, Los Angeles County, California*

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19. UTILITIES AND SERVICE SYSTEMS

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

IMPACT ANALYSES AND CONCLUSIONS:

Would the project:

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

Impact Analysis:

Implementation of the project will not require or result in the relocation or construction of new or expanded water, wastewater treatment, storm water drainage, electric power, natural gas, or telecommunications facilities. Furthermore, the installation of wells would occur at least 5 feet from any existing utilities present on the project site. As such, no impact would result from the project.

Conclusion: No impact.

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

Impact Analysis:

No new or expanded entitlements or new water resources will be needed to serve implementation of the project.

Conclusion: No impact.

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

Impact Analysis:

The proposed project does not require any new connections to existing sewer infrastructure and will not cause an increase in the amount of wastewater produced at the Project Site. No impact would result from the project.

Conclusion: No impact.

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

Impact Analysis:

Waste generation is not anticipated to impact or impair local infrastructure (i.e., landfills), and much of the waste pertaining to contaminated soils is expected to undergo treatment on-site. Eight roll-off bins of soil are estimated to be generated during project activities. If all eight bins are fully used (i.e., approximately 12 yards, or the equivalent to 18 tons for dry-normal density soil), approximately 96 yards of soil (or 144 tons) will be generated. The non-hazardous soil will be taken to a licensed disposal facility such as Soil Safe in Adelanto. Liquid waste generated (i.e., decontamination and purge water) will be taken to a licensed facility such as Crosby & Overton, located in Long Beach. As such, impacts related to solid waste would be less than significant.

Conclusion: Less than significant impact.

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

Impact Analysis:

Any solid waste activities associated with the project will comply with federal, state, and local statutes and regulations related to solid waste.

Conclusion: No impact.

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

IMPACT ANALYSES AND CONCLUSIONS:

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?

Impact Analysis:

The Project Site is not located in or near state responsibility areas or lands classified as very high fire hazard severity zones per review of CalFire Fire Hazard Severity Zone Maps. Therefore, no impacts would result from the project.

Conclusion: No impact.

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

Impact Analysis: See response 20(a) above.

Conclusion: No impact.

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

Impact Analysis: See response 20(a) above.

Conclusion: No impact.

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

Impact Analysis: See response 20(a) above.

Conclusion: No impact.

References Used:

CalFire. 2026. Fire Hazard Severity Zones in State Responsibility Area Accessed from: <https://calfire-forestry.maps.arcgis.com/apps/webappviewer/index.html?id=988d431a42b242b29d89597ab693d008>

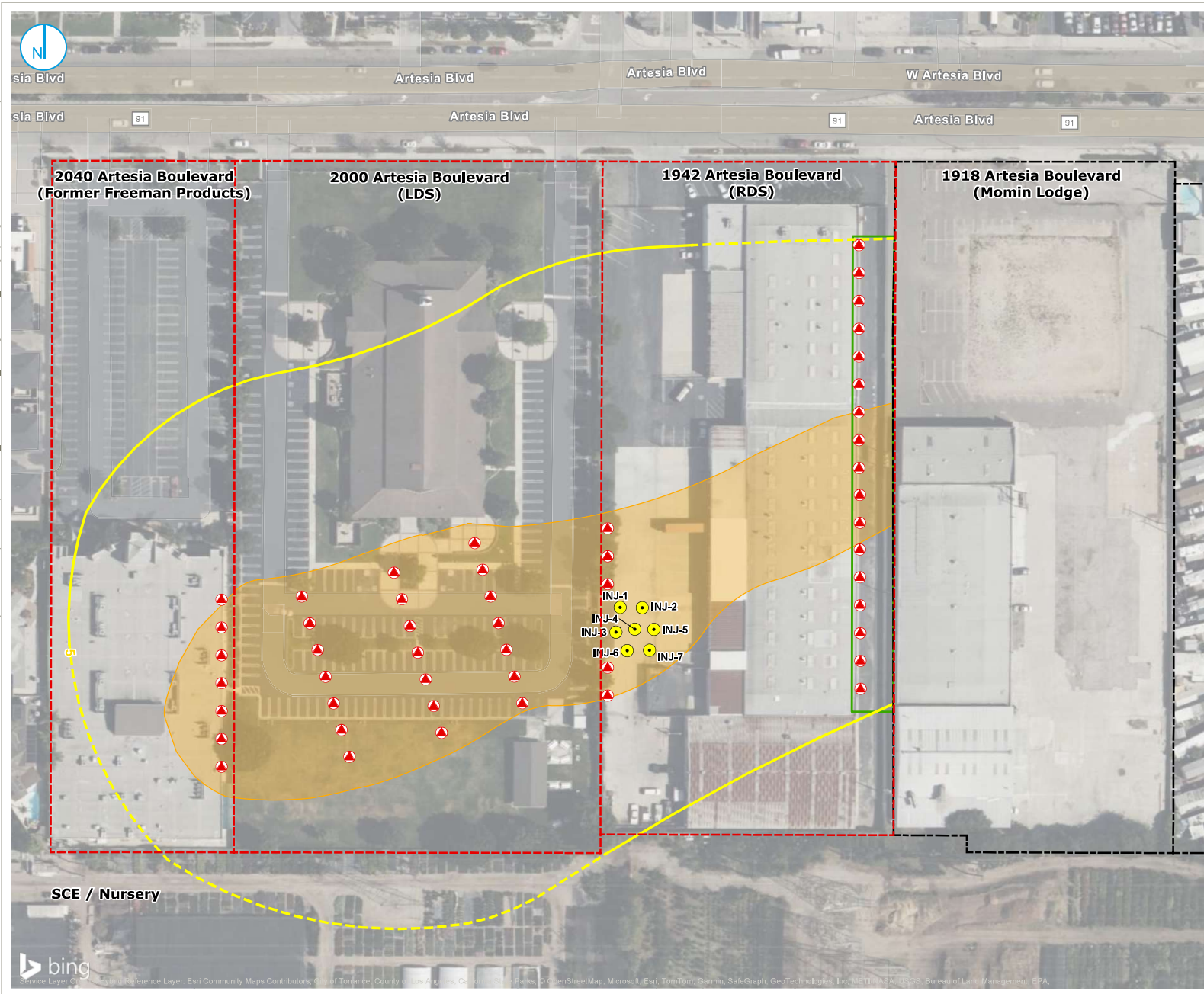
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21. MANDATORY FINDINGS OF SIGNIFICANCE**Based on evidence provided in this Initial Study, DTSC makes the following findings:**

- a. The project does not have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory. As discussed in Section 5 and Section 18, while the project could result in potentially significant effects on cultural resources and tribal cultural resources, these effects would be less than significant with the incorporation of the mitigation measures provided.
- b. The project does not have impacts that are individually limited but cumulatively considerable. (“Cumulatively considerable” means that the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)
- c. The project does not have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly.

Authority: Public Resources Code 21083, 21094.5.5

Reference: Public Resources Code Sections 21094.5 and 21094.5.5



- ▲ Proposed Injection Well Locations (50 total)
- Existing Injection Well
- Combined Impact Area (TCE = 5 to 1,000 µg/L)
- Combined Core Impact Area (TCE > 1,000 µg/L)
- Containment Area
- - - Project Site Boundary
- - - Surrounding Property Boundary

Notes

1. LDS = Church of Jesus Christ of Latter-day Saints
2. RDS = RDS Industries, Inc.
3. SCE = Southern California Edison
4. TCE = Trichloroethene
5. µg/L = micrograms per liter
6. Contours dashed where inferred.
7. Combined Core Impact Area is the area where at least one zone has TCE groundwater concentrations greater than 1,000 µg/L.
8. Combined Impact Area is the area where at least one zone has TCE groundwater concentrations greater than 5 µg/L excluding Combined Core Impact Area.
9. Containment Area is the area east of the RDS building and west of the RDS-Momin Lodge property line, and has TCE groundwater concentrations greater than 5 µg/L in at least one zone.

0 50 100
Feet

BIOREMEDIATION AT CORE IMPACT AND CONTAINMENT AREAS

Former Freeman Products
2040 Artesia Boulevard
Torrance, California

FIGURE 03

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RAMBOLL AMERICAS
ENGINEERING SOLUTIONS, INC.
A RAMBOLL COMPANY

RAMBOLL