

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 TITLE: Interim Measure Work Plan, Lead Contaminated Soils-Northern and Southern Assessment Areas		CALSTARS CODING: 30021448
PROJECT ADDRESS: Northern Assessment Area: East Olympic Blvd., & Indiana St.; Southern Assessment Area – 52 nd St. and Everett Ave.	CITY: Southern Assessment Area: Maywood Northern Assessment Area: Unincorporated Boyle Heights and East Los Angeles	COUNTY: Los Angeles
PROJECT SPONSOR: Department of Toxic Substances Control	CONTACT: Peter Ruttan	PHONE: 916/255-3630

APPROVAL ACTION UNDER CONSIDERATION BY DTSC:

- Initial Permit Issuance Permit Renewal Permit Modification Closure Plan
 Removal Action Workplan Remedial Action Plan Interim Removal Regulations
 Other (specify):
 Interim Measures Work Plan

STATUTORY AUTHORITY:

- California H&SC, Chap. 6.5 California H&SC, Chap. 6.8 Other (specify):

DTSC PROGRAM/ ADDRESS: Sacramento Office, 8800 Cal Center Drive, Sacramento, CA 95826-3200	CONTACT: Peter Ruttan	PHONE: 916/255-3630
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PROJECT DESCRIPTION:

The Department of Substances (DTSC) Control has reviewed and approved a Draft Interim Measure Work Plan (IMWP) for the purpose of mitigating potential health risks from lead impacted soils in off-site residential properties located in the Northern Assessment Area and the Southern Assessment Area. The Northern Assessment Area encompasses portions of the unincorporated communities of Boyle Heights and East Los Angeles, and the Southern Assessment Area is located within the city of Maywood (collectively referred to as Assessment Areas). A total of 213 homes in the Assessment Areas may require soil removal work; 89 homes in the Northern Assessment Area and 124 in the Southern Assessment Area. The Draft IMWP describes the work necessary to complete soil removal work at properties where the sampling shows lead in soils at concentrations warranting removal in yard areas. The boundaries of the Assessment Areas and their juxtaposition to the Exide Technologies (Exide) Vernon Facility are shown on the attached Figures 1 and 2.

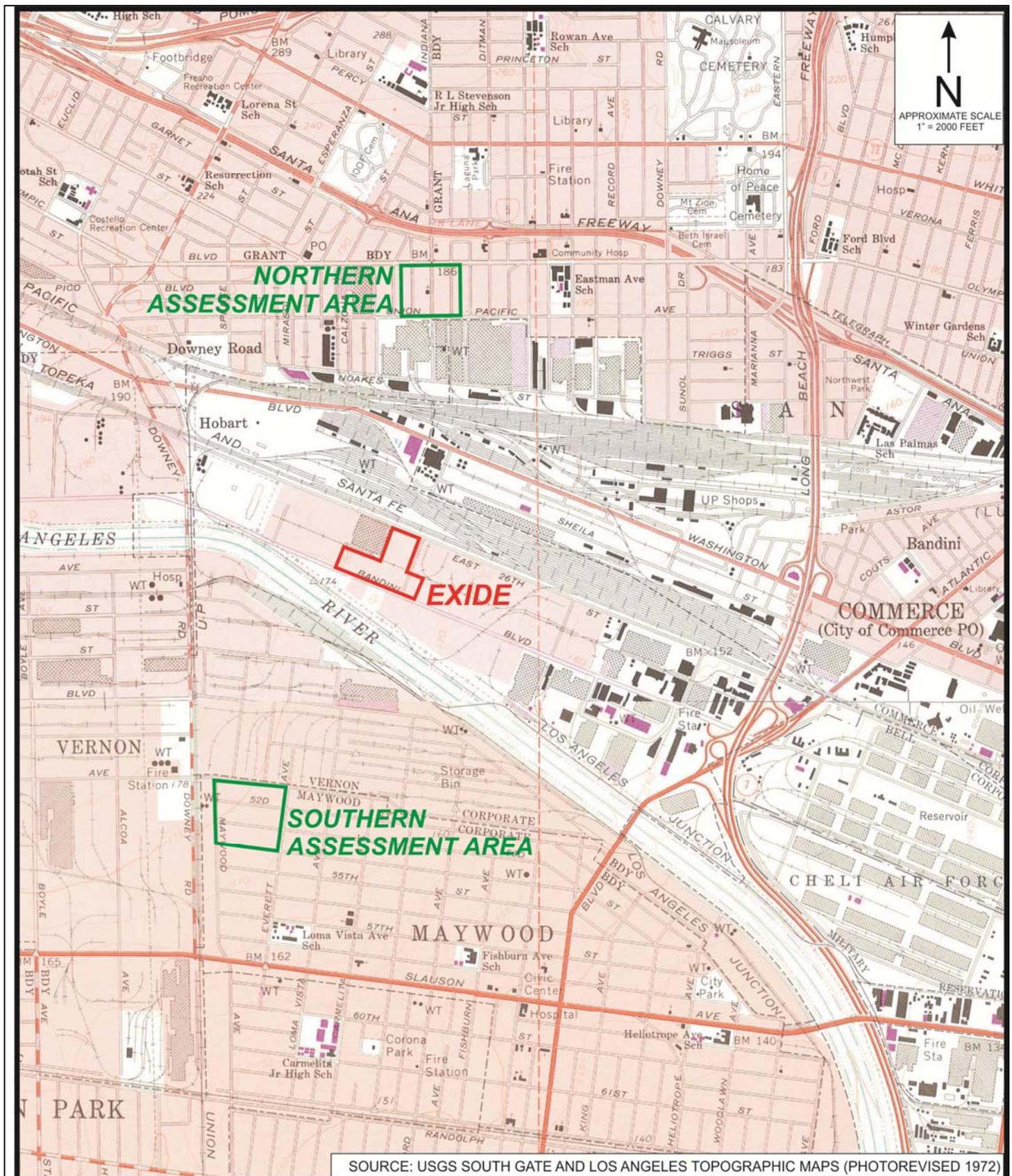


Figure 1

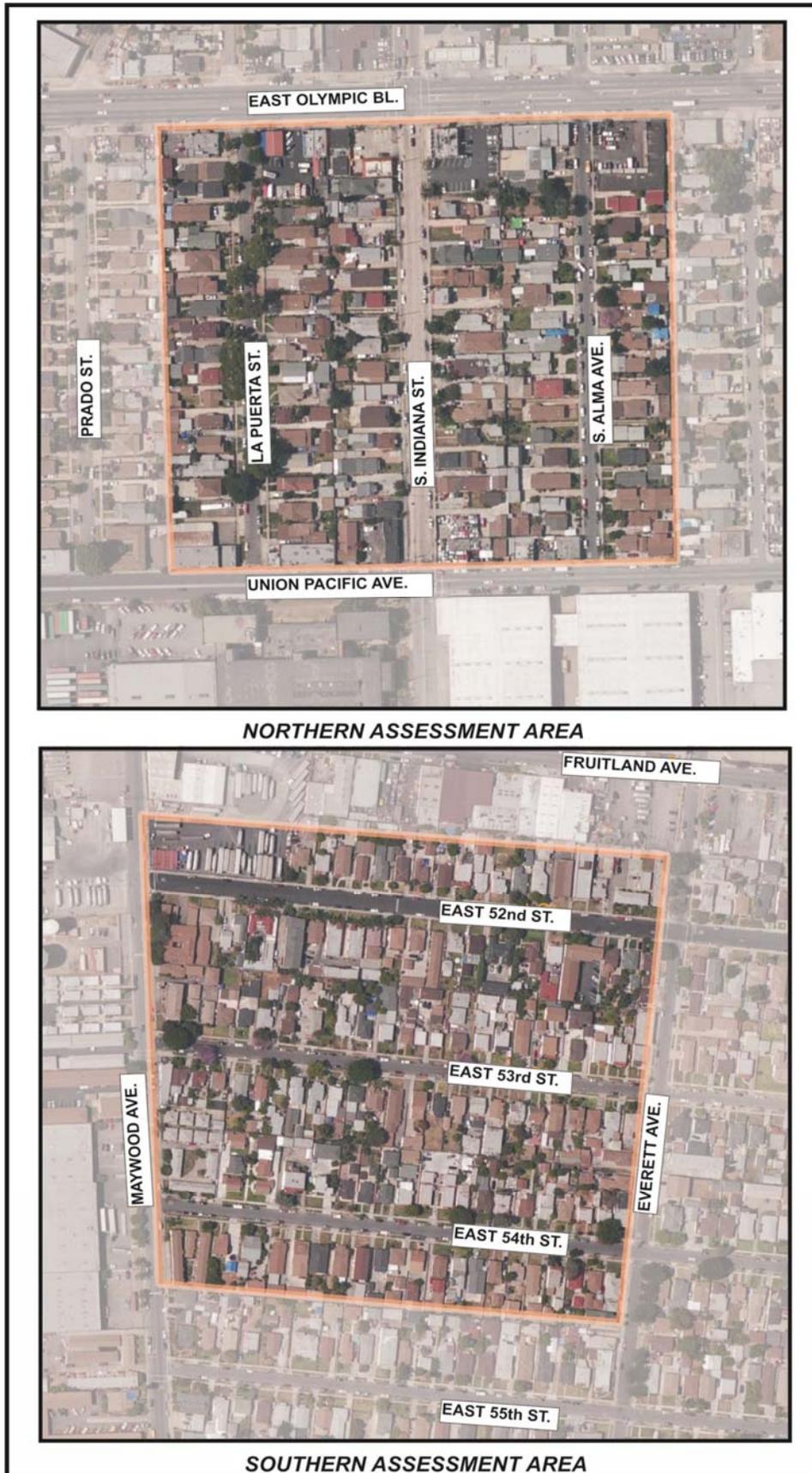


Figure 2

The surface of the Assessment Area properties generally consists of landscaping that includes trees, lawn and shrubs, flowerbeds, concrete driveways, walkways and patios. Each property is served by subsurface utilities that include electricity, gas, water, and sewer.

Public Outreach

Prior to the start of removal activities on a property, meetings will be held with each property owner/tenant to describe the soil removal and restoration activities to be performed on the property. Additional topics to be discussed will include protection of property and sentimental yard fixtures, relocation options, the means of paying per diem expenses, interior cleaning work, property security and post-restoration watering and care.

DTSC will prepare a flyer describing the work to be performed to leave with the residents. The flyer will include a 24-hour toll-free bilingual (English and Spanish) hotline provided by Exide's Contractor (Contractor) for residents or immediate and local neighbors to call if any questions or concerns arise during the work. A sign will be displayed at each property undergoing interim measures work that displays the toll-free hotline information line. The hotline will be an answering service that will collect the caller's contact information and forward to the Contractor and/or DTSC. If it is an emergency situation which must be dealt with immediately, the Contractor will report to the site to address the issue. If it is not an emergency, the issue will be addressed at the appropriate time during business hours. The sign will be placed near the street on the property where excavation is occurring. The sign shall read: "For information about the current work activities please call 1-800-XXX-XXXX" with the actual phone number displayed once it is established. The hotline will be discontinued following cessation of the interim measures work.

In addition to the residents where soil removal work is being performed, DTSC will notify local neighbors of the planned work. This notification will be in the form of a flyer mailed or given to the residents. DTSC will determine which residents in proximity to the work will be notified.

Permitting

All required permits pertaining to excavation and traffic control will be obtained prior to mobilization to the site by the California licensed Contractor charged with performing the interim measures work. The following permits are expected to be required for this work:

- Grading and Drainage Permit
- Lane Closure (Traffic Control) Permit

Landscape Activities

Prior to soil removal activities, the Contractor will assess all vegetation on the property (excluding trees) and create a Landscape Inventory, which will be approved by a licensed Landscape Architect hired by the Contractor. The Landscape Inventory will document the number and type of vegetation on each property and any planter walls, ornamental features such as decorative blocks, etc. that would have to be removed along with an installed replacement cost. Additionally, a sketch of the property along with location of each type of vegetation, planter walls, etc. will be developed. The Contractor will review the Landscape Inventory and sketch with the property owner and obtain the property owner's signature documenting agreement that the number, type and location are accurate. The replacement plants will be of similar species as existing plants indicated on the Landscape Inventory and be of nursery stock as available. The property owner will be given the option of restoring all plants on the property or accept monetary compensation as provided on the Landscape Inventory. If the property owner opts for vegetation replacement, the Contractor will install the plants per the Landscape Inventory that were removed during excavation or damaged during the work along with planter walls, decorative blocks and other ornamental features.

Removal Limits

The areas of soil removal are dependent on concentrations of lead in soils. The Interim Measures work will be performed at those properties in the Assessment Areas with lead concentrations exceeding 80 milligrams per kilogram (mg/kg)(also referred to herein as part-per million [ppm]). The soil removal areas to be typically excavated by the Contractor to a depth as shown on Figure 3. The maximum depth of excavation is expected to be no more than 18 inches; excavation depths may be less depending on concentrations of lead found in the soil. Areas within the biological root zone of trees will be excavated to a maximum depth of six inches in order to preserve the integrity and survivability of the trees. Excavations will be conducted using small construction equipment proposed by the Contractor (e.g., mini-excavator, skid steers). Hand excavations may be conducted in proximity to structures, utilities, mature trees or other areas, as needed, that would be difficult to excavate around or that may become damaged by equipment. Soil removal will not be performed beneath or inside structures, roads, sidewalks, brick patios, driveways or other inaccessible or permanent features. Excavations against houses, garages, outbuildings, driveways, sidewalks, structural perimeter walls and fences and patios will be limited to six inches for a one foot offset from the structure and slope downward one-vertical to 1 horizontal (1H:1V) to the full 18-inch removal depth as necessary. If all homes in the Assessment area require soil removal work, the total amount of soil per yard is assumed not to average approximately 75 cubic yards. Approximately 6,675 cubic yards of soil is assumed to be removed for disposal in the Northern Assessment Area and approximately 9,300 cubic yards of soil is assumed to be removed for disposal from the Southern Assessment Area for a total of 15,975 cubic yards of soil.

If a planter is not structurally sound, the planter will be removed (with the permission of the property owner), the soil removed, and the planter rebuilt by the Contractor. Shrubs and other plants (excluding trees) will be removed and disposed off-site; trees will be left in place.

Erosion and Dust Control

In order to prevent any sediment from leaving the work area during soil disturbance activities, silt socks will be used on the perimeter of the property as needed. Additionally, inlet control devices will be utilized in case of a rain event. Actual erosion control devices will be proposed by the Contractor performing the work and will be shared with DTSC for review and approval at least one week prior to the beginning of field work or at the pre-excavation meeting.

The work will require the spraying of water as a mist on the excavation areas prior to removal in order to prevent fugitive dust during construction. The amount of water will not saturate the soils, and no runoff is expected during this operation. Although not anticipated to be needed to prevent off-site migration of soil, silt socks (compost filled fabric tubes), silt fence or similar measures will be installed along the perimeter of the excavations. Water spraying during loading, if necessary, will be conducted while the transport vehicle is located on a decontamination area consisting of plastic sheeting and a water collection point provided by the Contractor. All water used for loading and/or decontamination will be captured and transported to approved facility for treatment and disposal. Dry decontamination methods (i.e. shovels to remove any fallen soil, brushes to loosen caked on soil, etc. followed by HEPA vacuuming) are anticipated to be used on transport trucks and on excavation equipment following construction.

The Contractor will provide water absorption materials to capture all water prior to leaving the property. This would include any leaks in hoses or stormwater from a rain event that may happen during construction. All captured water would be transported to an approved facility for treatment and disposal.

Excavation Area Safety

At the end of each day, the Contractor shall install orange safety fencing, as needed, along the edges of excavation to restrict access to the areas. The Contractor shall follow applicable sections of “Article 6 – Excavations” in California Occupational Safety and Health Administration’s Construction Safety Orders. The

Contractor shall notify Underground Service Alert (USA) 48 hours prior to initiating excavation activities.

The Contractor will identify the disposal facility, based on the characterization results, prior to removal work. The trucks/rolloffs will proceed directly to the disposal facility after loading and decontamination. The precautions the Contractor will utilize to prevent track-out from trucks or roll-off bins will be a decontamination area consisting of plastic sheeting. The vehicles will undergo dry decontamination methods (i.e. shovels to remove any fallen soil, brushes to loosen caked on soil, etc. followed by HEPA vacuuming) as necessary. Following the transport vehicle departure, the Contractor will remove any residual soils from the decontamination area using the techniques discussed above. Transport vehicle departure will be scheduled when the transport vehicle has reached its limit of weight or volume. Actual times for departure will be determined by the Contractor in the field.

A map that shows the planned local route to the disposal facility is provided as Figure 3 below. The map begins at the intersections of Olympic Boulevard and South Indiana Street for the Northern Assessment Area and at the corner of Maywood Avenue and Fruitland Avenue for the Southern Assessment Area to provide a level of confidentiality to the properties to be remediated.

Protection of Existing Structures

Throughout site preparation, removal, and restoration activities, the Contractor will implement procedures to protect existing property features from damage. Procedures will include safe working distances, warning tape, manual digging and temporary fencing and barriers. At the completion of work on a daily basis, and as necessary during the course of work, driveways and sidewalks on the property will be cleaned using high efficiency particulate air (HEPA) certified vacuums. If a wet method is necessary (e.g., power spray), the Contractor will ensure that the water is collected in a manner such that sediment is prevented from entering stormwater inlets or other structures. Any damage to public or private properties shall be addressed by the Contractor at no expense to the property owner or any other party.

Dust Suppression and Air Quality Monitoring

Additionally, the Contractor shall take measures to minimize any potential intrusion of fugitive dust into the residential structures by dust suppression techniques and by requesting all residence windows and doors be closed prior to excavation activities. A rule of “no visible dust” will be applied to all aspects of the work.

Air monitoring will be performed by Exide’s Consultant during excavation activities to ensure that there is no fugitive dust from the excavation activities. Real-time particulate monitors and personal air monitors (PAMs) will be utilized during the operations.

Real-time Particulate Monitors Exide will utilize three (3) particulate dust monitors at an excavation area daily. Particulate dust monitors measure the total dust in the air. A monitor will be placed downwind of the excavation area to provide a baseline dust concentration. A monitor will be placed upwind of the excavation to monitor any dust coming from sources unrelated to the work. The third monitor will be placed at the closest entryway to the home to understand any particulates in proximity to the work. A Dust Trak model 8530 or model 8532 will be utilized which measure total suspended particles (TSP) in the air. This monitor measures aerosol particulates corresponding to PM10 size fractions. The monitors will be placed each day of excavation prior to soil disturbance activities and review the levels relative to the real-specific action level on ½ hour intervals during the work. The action level shall be the South Coast Air Quality Management District’s standard for PM10 which is 50 micrograms per cubic meter (ug/m³). This concentration will be above the upwind monitor reading which will be considered the baseline reading. If the downwind or entryway monitor shows a level above the action level, the upwind monitor will be checked to see if there is an upwind source for the increased dust level, the Contractor will be informed, and the monitor will be checked again in 10 minutes to determine whether the level has dropped below the action level. If it has not, the Contractor will be

instructed to slow the work and increase the dust suppression techniques.

In addition to the three dust monitors, a Gilian GilAir-5 model PAM co-located with a dust monitor will be placed at each location during the excavation work. The PAMs will be analyzed for lead content at an off-site laboratory after completion of the excavation work to be reviewed and documented for future use. The date, start time, end time and air flow will be recorded on the cassette for analysis purposes.

Transportation Routes

Excavated material will be transported via surface streets directly to the off-site disposal facility. Backfill will be transported directly to the residential property. The Contractor will control construction vehicular traffic to make sure activities are performed safely and efficiently. The Contractor and his personnel will remain cognizant of the nature of this work within residential neighborhoods. Speed limits will be established and implemented by signs and flagmen, as necessary, to minimize dust generation and maintain a safe environment for workers and local residents, including children. All trucks hauling excavated or backfill soil will be tarped during transportation.

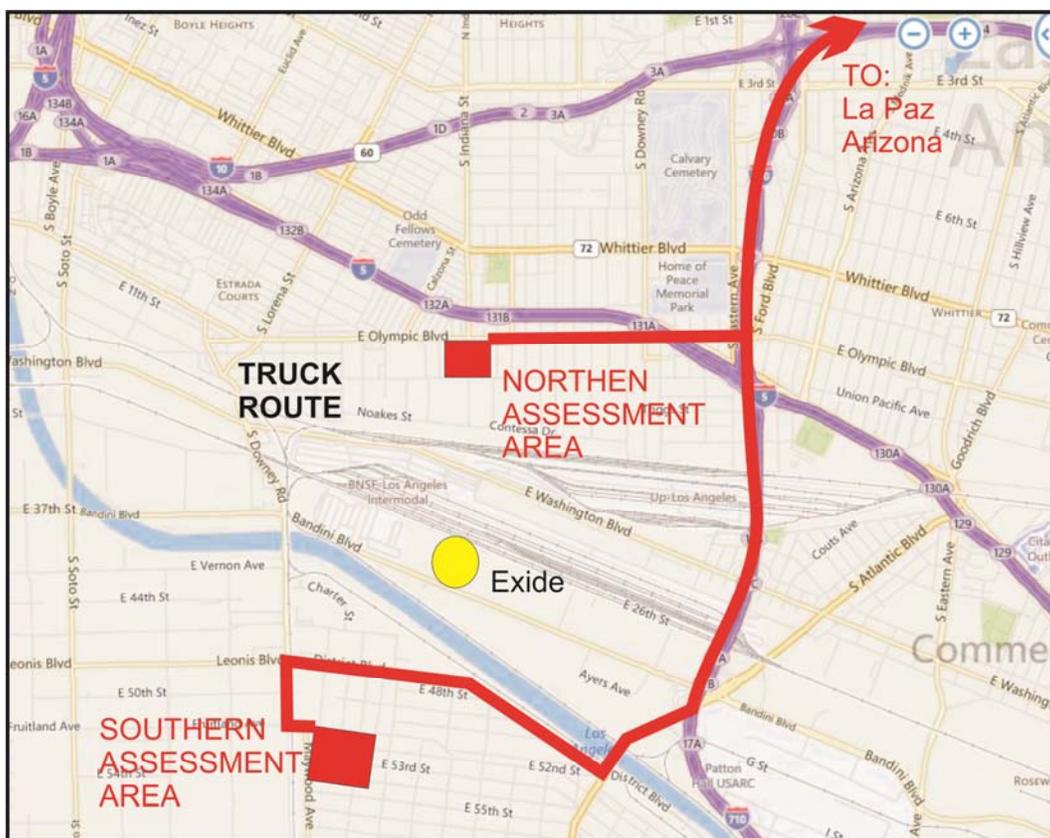


Figure 3

Restoration

Structural soil fill material will be used to achieve backfill grades to within 3 inches of final grade for excavation areas that are 12 inches or greater. Soil samples of any fill materials will be collected prior to use and submitted by the Contractor for laboratory analysis. The sampling procedures will follow DTSC's *Information Advisory for Clean Imported Fill Material*, dated October 2001. Sample analysis results will be compared to the DTSC Residential Screening Values. Soil fill materials will be free from roots and other organic matter, trash, debris, and stones larger than three inches in any dimension. Soil fill materials will be placed in loose, 8-inch lifts and compacted by mechanical methods. Topsoil material will be a natural, friable soil with organic content of at least 2%, and nutrients sufficient to sustain grass growth and free of any trash or other deleterious debris. The maximum particle size will be 3/4 inch and rocks greater than 1/8 inch shall not be greater than 5% total by weight. The Contractor will screen the topsoil, as required, so the maximum

particle size is not exceeded. Topsoil samples will be collected prior to use and submitted by the Contractor for laboratory analysis, and the results will be compared to the DTSC Residential Screening Values as well as determining the appropriate soil nutrients and organic content.

Scheduling

Soil removal activities will begin on properties according to priority status within two weeks of DTSC approval of the IMWP. The Contractor will be expected to work on soil removal at two properties in the Assessment Area concurrently. Backfill and restoration will immediately follow the soil removal. Interior cleaning will be performed within two weeks of completion of exterior work on the property. All work is subject to property owner approval as demonstrated by signing the access agreement. Exide will notify DTSC as soon as practicable if circumstances beyond its or the Contractor's control such as extended rain events, unforeseen material or obstacles in the yard or difficulties in obtaining access prevent the work from being completed according to this schedule.

For the purpose of this analysis, it is assumed that 2 lots will be completed per week and it will take 538 operational days. This would be considered a "worst case" scenario, since it is anticipated that less than 215 properties will have soil removal.

ENVIRONMENTAL IMPACT ANALYSIS:

1. Aesthetics

Project Activities Likely to Create an Impact:

- Excavation of soil in front yards
- Disturbance of ornamental vegetation during excavation activities
- Temporary trucks and other equipment

Description of Baseline Environmental Conditions:

The Assessment Areas are residential neighborhoods located in an urbanized setting. The topography is generally flat. The boundaries of the Assessment Areas and their juxtaposition to the Exide Technologies (Exide) Vernon Facility are shown on Figures 1 and 2, above.

The surface of the Assessment Area properties generally consists of landscaping that includes trees, lawn and shrubs, flowerbeds, concrete driveways, walkways and patios. Each property is served by subsurface utilities that include electricity, gas, water, and sewer.

The assessment areas consist of residential developments with lot sizes approximately 5,200 square feet. Similar residential neighborhoods surround the assessment areas. There are also industrial areas in proximity to the assessment areas, and railroad tracks.

Analysis as to whether or not project activities would:

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

Impact Analysis:

The project is located in an urbanized area with flat topography. There are no scenic vistas in the vicinity of the project and there will be no impact to a scenic vista.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

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

Impact Analysis:

The project is in an urbanized area with no scenic resources. There are no state scenic highways in the vicinity of the project. There will be no impact.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

- c. Substantially degrade the existing visual character or quality of the site and its surroundings.

Impact Analysis:

The project may temporarily alter the existing visual character of the site through the removal of lawns and other ornamental landscaping of individual properties. This impact would be temporary in nature, since all landscaping will be replaced in accordance with the property owner's request. After the new landscaping is installed, it is anticipated that the visual character and quality of the site will be improved. This impact is less than significant.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

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

Impact Analysis:

There will be no nighttime work during implementation of the work plan and artificial lighting will not be necessary to conduct the clean-up operations. There will be no source of artificial light or glare and no impact.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

2. Agricultural Resources

Project Activities Likely to Create an Impact:

None.

Description of Baseline Environmental Conditions:

The Assessment Areas are in a highly urbanized area characterized by existing residential neighborhoods and surrounding industrial uses. No agricultural land uses are located in proximity to the assessment areas. Further, there are no agricultural resources, i.e. food crops grown for commercial purposes, located in the immediate area.

Analysis as to whether or not project activities would:

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

Impact Analysis:

There is no farmland located in the vicinity of the project site; therefore, no farmland will be converted to a non-agricultural use and there will be no impact.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

- b. Conflict with existing zoning or agriculture use, or Williamson Act contract.

Impact Analysis:

The proposed project will not conflict with existing zoning and there are no agricultural uses or Williamson Act contracts in the project vicinity. There will be no impact.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

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

Impact Analysis:

There will be no changes in the existing environment which will convert Farmland to non-agricultural uses since there is no Farmland in the vicinity of the project. There will be no impact.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

3. Air Quality

Project Activities Likely to Create an Impact:

- Excavation of contaminated soil
- Truck traffic required to export contaminated soil and import backfill material
- Equipment required to excavate soil and restore landscaping

Description of Baseline Environmental Conditions:

The area surrounding the Assessment Areas consists of residential and commercial/industrial uses. Possible receptors may include workers and local commercial/industrial and residential population surrounding the Assessment Areas. Federal, state and local governments have been empowered to regulate the emission of airborne pollutants and have established air quality standards for protection of public health. The U.S. Environmental Protection Agency established national ambient air quality standards pursuant to adoption of federal Clean Air Act. The California Air Resources Board (CARB) establishes state air quality standards under the mandate of the Mulford-Carrell Act. California standards have been established for ozone (O₃), carbon monoxide (CO), nitrogen oxide (NO_x), sulfur dioxide (SO_x), particulate matter, lead, sulfates, hydrogen sulfide, vinyl chloride and visibility reducing particles. Local control in air quality management is provided by the State through air pollution control districts or air quality management districts, including the South Coast Air Quality Management District (SCAQMD) for the Assessment Area. SCAQMD monitors air quality in the South Coast Air Basin (SCAB) and has adopted an Air Quality Management Plan (AQMP) to reduce air pollution to healthful levels. A summary of federal and State air quality standards is provided in Table 1 and potential health effects in Table 2.

It is the responsibility of the SCAQMD to ensure that state and federal ambient air quality standards (AAQS) are achieved and maintained in its geographical jurisdiction. Health-based air quality standards have been established by California and by the federal government for the following criteria air pollutants: ozone, carbon monoxide (CO), nitrogen dioxide (NO₂), PM₁₀, PM_{2.5}, sulfur dioxide (SO₂) and lead. Further, California has additional standards for sulfates, hydrogen sulfide, vinyl chloride, and visibility. Attainment of the state and federal ambient air quality standards protect sensitive receptors and the public in general from the adverse effects of criteria pollutants that are known to have adverse human health effects. These standards are established to protect sensitive receptors within a margin of safety from adverse health impacts due to exposure to air pollution.

The primary air quality concerns for the Work Plan excavation activities are dust emissions (generated from excavating, backfilling and landscaping operations) and vehicle emissions (associated with operations of gasoline and diesel powered heavy-duty mobile construction equipment).

SCAQMD has two rules, which address excavation (Rules 1150 and 1166), and one, which addresses fugitive dust (Rule 403). Rule 1150 applies to the excavation of sanitary landfills and does not apply to this project. Rule 1166 applies to the excavation of soils containing VOCs. VOCs are not a COC at the Site; therefore, Rule 1166 does not apply to this project.

Several elements of Rule 403, such as protocols for control of potential fugitive dust emissions, have been incorporated into this Work Plan. Excavation, loading, and transport of impacted soils will be in compliance with Rule 403 prevention, reduction, and control measures for fugitive dust emissions. However, notification of the SCAQMD is required only for large operations (disturbing more than 100 acres or moving more than 10,000 cubic yards per day (CY)). It is anticipated that less than 1000 sq. or less than 50 CY of contaminated soils will be generated per day for disposal. Therefore, no notification or filing of a Fugitive Dust Emission Control Plan is required due to the project size.

Air quality impacts are determined according to the criteria set by the federal, state and local pollution standards. The short term impacts on the air pollutants (i.e., O₃, CO, NO_x, SO_x and PM₁₀) from the fugitive dust and construction equipment due to construction activities have been analyzed. Control measures will be instituted to prevent excessive amount of fugitive dust and vehicle emissions, as necessary during all phases of project implementation. The SCAQMD Guidelines describe such measures.

Based on the above discussion in the Baseline Environmental Conditions, the proposed project (Interim Measure Soil Removal Activities) will not have a significant adverse impact on air quality, and therefore requires no mitigation measures.

The following best management practices will, however; be implemented during the removal action, where feasible, to minimize project emissions:

- Individual truck idling in excess of five consecutive minutes will be prohibited, unless allowed under Title 13 of the California Code of Regulations §2485 (CARB's Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling).
- Suspend any excavating and grading operations when wind speeds (as instantaneous gusts) exceed 20 miles per hour.
- Ensure that all construction equipment is properly tuned and maintained prior to and for the duration of construction.
- Portable engines and portable engine-driven equipment units used at the project work Site, with the exception of on-road and off-road motor vehicles, require CARB Portable Equipment Registration or a SCAQMD permit.
- Provide adequate ingress and egress to minimize vehicle idling and traffic congestion.
- All contractors will comply with all applicable SCAQMD rules (including Rule 403) and regulations in carrying out project activities.

To reduce the potential for significant hazardous air emissions the following project controls will be included:

- Apply water to all unstabilized disturbed areas 3 times per day, or as needed.
- Maintain slow speeds with all vehicles
- Load significantly impacted soil directly into transportation trucks to minimize soil handling
- During dumping, minimize soil drop height into transportation trucks or stockpiles
- During transport, cover or enclose trucks transporting soils
- Place stockpiled soil in areas shielded from prevailing winds
- Covering of soil stockpiles during non-work hours to abate dispersion by wind and rain

Excavation areas will be controlled with physical barriers (e.g., perimeter fencing with tarps), soil wetting and air monitoring (at property perimeter and work area) to avoid or control dust generation. Water will be used periodically to control any fugitive dust from blowing onto other properties. In times of high wind conditions (e.g., wind speed in excess of 20 miles per hour), all excavation areas will be securely covered to prevent excessive amounts of dust. The areas that require excavation and earth-moving operation will be minimized to prevent excessive amounts of dust.

As soil is excavated, it will be temporarily stored in staging areas on-site until laboratory results and off-site transportation and disposal are available. At the staging areas, all excavated soils will be placed on an impermeable barrier and covered with tarps or other proper materials to prevent any runoff and /or dust generation. During non-excavation hours, excavated soil stockpiles will be covered with plastic sheeting or other physical barriers that minimize movement of materials from the Site by wind, water, or any other mechanism. The temporary on-site storage of excavated soil wastes will be secured and properly labeled with hazardous waste signs until off-site transportation and disposal are ready.

All excavated or import fill materials will be shipped in trucks covered with tarps.

Air quality impacts are determined according to the criteria set on the federal, State, and local pollution standards/ regulations. Impacts would be considered significant if the proposed project emissions met any of the criteria in Table 1 below:

Table 1. Air Quality Significance Thresholds (Mass Daily)	
Pollutant	Construction Threshold (lbs/day)
Volatile Organic Compound (VOC) [Reactive Organic Gases (ROG)]	75
Carbon Monoxide (CO)	550
Nitrogen Oxides (NO _x)	100
Sulfur Oxides (SO _x)	150
Fine Particulate Matter (PM _{2.5})	55
Respirable Particulate Matter (PM ₁₀)	150
Lead	3

SOURCE: South Coast Air Quality Management District, SCAQMD Air Quality Significance Thresholds, <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf?sfvrsn=2>

The primary air quality concerns for the soil removal and property restoration activities are dust emissions generated from excavating, backfilling, and landscaping operations and vehicle emissions associated with operations of gasoline and diesel powered construction equipment including backhoes and excavators.

Emissions estimates have been calculated for the pollutants identified in Table 1 utilizing the California Emissions Estimator Model (CalEEMOD) Version CalEEMOD.2013.2.2. The complete CalEEMOD output reports are included in Attachment A.

Estimating construction equipment exhaust emissions requires estimates of hours of operation by type of equipment and equipment horsepower. Table 2 provides a summary of equipment and operational assumptions that were used as input parameters for the CalEEMOD emission estimates. In order to calculate the emissions related to the project, two separate phases were created within CalEEMOD. These phases include Phase 1: Excavation and Phase 2: Backfilling. Phase 1 is intended to capture activities related to excavation and transportation of contaminated soil and Phase 2 is intended to capture activities related to site restoration work including import of fill material and restoration of landscaping.

Table 2 : Operational Assumptions for CalEEMOD	
Phase	Assumptions for Input Parameters
Phase I - Excavation	1 Mini-Excavator (25 hp) operating at a load factor of 0.41 for 8 hours per day
	1 Skid Steer Loader (66 hp) operating at a load factor of 0.4 for 8 hours per day
	100 mile offhaul trip within SCAQMD*
	15050 total tons of contaminated soil to be excavated and transported for disposal
	20 tons per truck
	215 total sites to be addressed
	Site average of 70 tons of soil for excavation and disposal
	Two sites to be addressed per week = 538 total operation days
	10 total acres to be disturbed
	Phase I and Phase II work to occur concurrently

	Exposed areas will be watered 3 times per day *
	Ground cover of disturbed area will be replaced *
Phase II - Backfilling	1 Skid Steer Loader (66 hp) operating at a load factor of 0.37 for 8 hours per day
	1 Compactor (5 hp) operating at a load factor of 0.41 for 7 hours per day
	25 mile truck import trip within SCAQMD***
	15050 total tons to be imported for backfill
	215 total sites to be addressed
	Site average of 70 tons of soil for excavation and disposal
	Two sites to be addressed per week = 538 total operation days
	20 tons per truck
	10 total acres to be disturbed
	Phase I and Phase II work to occur concurrently
	Exposed areas will be watered 3 times per day *
	Ground cover of disturbed area will be replaced *
* Transport of contaminated material to La Paz, Arizona.	
**The SMAQMD CEQA Guide, revised June 2014, attributes 74% reduction in PM emissions to replacing ground cover of disturbed area (Page 3-11).watering 3 times per day and 5% reduction of PM with	
*** Import fill material assumed to be locally sourced within the SCAQMD.	

An assessment of the significance of the air emissions from the project has been prepared using the mass daily limits (pounds per day) as specified by the SCAQMD and is presented in Table 3.

Contaminant	Total Project Emissions (lbs)	Project Daily Average Emissions (lb/day)*	SCAQMD Mass Daily Threshold (lb/day)
ROG	303.8	0.5647	75
CO	3069.0	5.7045	550
NOx	3662.8	6.8082	100
SOx	6.7	0.0125	150
PM2.5	213.0	0.3959	55
PM10	439.6	0.8171	150
Lead	0.136**	0.0003	3
*Calculated by dividing total project emissions by project duration (538 days)			
**Lead concentrations calculated by assuming all Fugitive PM10 emissions are from the sites and contain lead at a concentration of 400 mg/Kg.			

Analysis as to whether or not project activities would:

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

Impact Analysis:

All work will be done in accordance with the SCAQMD Air Quality Management plan; therefore, the project will not conflict with the plan or obstruct implementation of the 2012 SCAQMD air quality plans..

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

- b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation.

Impact Analysis:

As shown in Table 2 above, the project will not violate any air quality standard or contribute substantially to an existing or projected air quality violation.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

- c. 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 (including releasing emissions which exceed quantitative thresholds for ozone precursors).

Impact Analysis:

The project area is in a designated non-attainment area for 24-hour PM_{2.5} and PM₁₀. While the operation of the proposed project will generate dust and other air pollutants, the short-term duration, relative low daily emissions, and no addition of fixed-sources, would likely not result in a cumulative considerable net increase in any criteria pollutant. This is a less than significant impact.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

- d. Expose sensitive receptors to substantial pollutant concentrations.

Impact Analysis:

There are three schools within ¼ mile of the truck route for the Northern Assessment Area and three schools located with ¼ mile of the Southern Assessment Area. The project will not generate substantial pollutant concentrations and project control measures described above will ensure that dust will be controlled and particulate matter will be monitored. If a downwind or entryway monitor shows a level above the action level, the upwind monitor will be checked to see if there is an upwind source for the increased dust level. If the level remains high, work will be slowed and dust suppression techniques will be increased. This will be a less than significant impact.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

- e. Create objectionable odors affecting a substantial number of people.

Impact Analysis:

Short term odors will be created mostly due to diesel fumes associated with construction equipment; however, due to the minimal amount of equipment operating on a daily basis, the objectionable odors are not anticipated to affect a substantial number of people.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

f. Result in human exposure to Naturally Occurring Asbestos.

Impact Analysis:

The area is not located in an area known to have naturally occurring asbestos. Project activities will only involve the removal of up to 18 inches of fill material. No native soil will be disturbed and there will be no potential to expose persons to naturally occurring asbestos.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

4. Biological Resources

Project Activities Likely to Create an Impact:

- Excavation activities associated with removal of contaminated soil and landscaping

Description of Baseline Environmental Conditions:

The Assessment Areas are in a highly urbanized area characterized by existing residential neighborhoods and surrounding industrial uses. There are no open space or natural areas in or adjacent to the Assessment Areas. The Los Angeles River is nearby; however, it has been channelized and entirely lined in cement through the area. Native habitats were likely removed from the Assessment Area during housing development. Yards consist of ornamental landscaping, lawns and cement patios and driveways. Biological resources in the area are limited to small common species associated with urban environments.

Analysis as to whether or not project activities would:

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

Impact Analysis:

The proposed project will not disturb habitat suitable for candidate, sensitive, or special status species. These species are not present at or near the assessment areas.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

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

Impact Analysis:

The proposed project will not impact riparian habitat, aquatic communities, other sensitive natural communities or wetlands because no such habitat is located at or near the project site.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

- c. Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.

Impact Analysis:

There are no wetlands present on or near the assessment areas and there will be no removal, filling or hydrologic interruption as a result of project activities.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

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

Impact Analysis:

The assessment areas are located in a highly urbanized environment surrounded by residential and industrial uses. There are no wildlife migration routes or wildlife nursery sites located at or near the assessment areas.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

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

Impact Analysis:

Biological resources will not be impacted by this project. Project activities near ornamental trees will limit excavation depth to 6 inches in order to preserve the existing trees. Since no trees or other biological resources will be removed there will be no conflict with local policies or ordinances.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

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

Impact Analysis:

There are no Habitat Conservation Plans, Natural Community Conservation Plans or other types of conservation plans in the project area. There will be no impact.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

5. Cultural Resources

Project Activities Likely to Create an Impact:

- Excavation of contaminated soil

Description of Baseline Environmental Conditions:

The Assessment Areas are located in a developed urbanized locale that is underlain with fill material. The Assessment Areas are developed with single-family residential units built between the 1920's and the present. None of these structures are listed or eligible for listing in the California Register of Historical Resources and these buildings are not considered to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military or cultural annals of California.

Analysis as to whether or not project activities would:

- a. Cause a substantial adverse change in the significance of a historical resource as defined in 15064.5.

Impact Analysis:

The project involves excavation of contaminated soil and some removal and replacement of landscape vegetation. No buildings will be removed or altered in any way. There is no impact.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

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

Impact Analysis:

There are no known archeological resources in the assessment areas. Excavation depths will be limited to 18 inches. All excavation will be in non-native soils and there is no potential to encounter archeological resources.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact

No Impact

- c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

Impact Analysis:

No paleontological resources have been identified in the Assessment Areas. Excavation depth will not exceed 18 inches and will be limited to non-native soils. There is no potential to encounter paleontological resources. The project will have no impact on paleontological resources.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

- d. Disturb any human remains, including those interred outside of formal cemeteries.

Impact Analysis:

The project will not disturb human remains. Excavation depth will not exceed 18 inches and will be limited to non-native soils. There is no potential to encounter human remains. The project will have no impact on human remains.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

:

6. Geology and Soils

Project Activities Likely to Create an Impact:

None.

Description of Baseline Environmental Conditions:

The Assessment areas are located at an average elevation of 180 feet above mean sea level, in the Coastal Plain of Los Angeles within the Peninsular Range Geomorphic Province. The Assessment Areas and surrounding properties have a generally flat topography. Soil contamination has been identified or is suspected in a number of locations throughout the Assessment Areas.

The Los Angeles area is considered a seismically active region and seismic shaking could occur from earthquakes generated by active faults in the region. The Assessment Areas are developed with typically single-family one-story structures.

Analysis as to whether or not project activities would:

- a. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

- ❖ Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault. (Refer to Division of Mines and Geology Special Publication 42).
- ❖ Strong seismic ground shaking.
- ❖ Seismic-related ground failure, including liquefaction.
- ❖ Landslides.

Impact Analysis:

Project activities are limited to excavation of contaminated soil to a maximum depth of 18 inches. No construction will occur as part of the project activities. The excavation of limited amounts of soil in the Assessment Areas will not result in increased seismic activity and will not be affected by seismic activity. There will be no impact related to increased hazards from seismic events.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

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

Impact Analysis:

The Assessment Areas are generally flat and no soil erosion will result from project activities. The soil being excavated is fill material and not native topsoil. There is no impact related to soil erosion or the loss of topsoil.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

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

Impact Analysis:

The removal and replacement of 6 – 18 inches of non-native soil will not cause soil to become unstable. The topography of the site assessment areas is flat with no potential for landslide. Lateral spreading, subsidence, liquefaction and collapse will not occur as a result of project activities.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

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

Impact Analysis:

No buildings will be constructed during implementation of this project. The project will not create substantial risks to life or property. There will be no impact.

Conclusion:

- Potentially Significant Impact
- Potentially Significant Unless Mitigated
- Less Than Significant Impact
- No Impact

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

Impact Analysis:

The Assessment Areas are already developed with residential uses, highly urbanized, and connected to public sewer systems. There will be no impact related to the use of septic tanks or alternative wastewater disposal systems.

Conclusion:

- Potentially Significant Impact
- Potentially Significant Unless Mitigated
- Less Than Significant Impact
- No Impact

7. Greenhouse Gas Emissions

Project Activities Likely to Create an Impact:

- Excavation
- Backfilling
- Hauling of import fill
- Hauling of soil for disposal
- Transportation of workers to the site

Description of Baseline Environmental Conditions:

The site is located within the jurisdiction of the SCAQMD, which has not established significance thresholds for construction activities. The project will generate greenhouse gases (GHG) from the consumption of fossil fuels by construction equipment, dump trucks, and worker vehicles. Two separate species of GHG have been quantified for this project: Carbon dioxide (CO2) and methane (CH4). Quantification of these species was performed utilizing CalEEMOD. In order to estimate the GHG emissions from construction activities, operational assumptions were made and are presented in Table 1 below.

Table 1 : Operational Assumptions for CalEEMOD	
Phase	Assumptions for Input Parameters
Phase I - Excavation	1 Mini-Excavator (25 hp) operating at a load factor of 0.41 for 8 hours per day
	1 Skid Steer Loader (66 hp) operating at a load factor of 0.4 for 8 hours per day
	100 mile offhaul trip within SCAQMD*
	15050 total tons of contaminated soil to be excavated and transported for disposal
	20 tons per truck
	215 total sites to be addressed

	Site average of 70 tons of soil for excavation and disposal
	Two sites to be addressed per week = 538 total operation days
	10 total acres to be disturbed
	Phase I and Phase II work to occur concurrently
	Exposed areas will be watered 3 times per day *
	Ground cover of disturbed area will be replaced *
Phase II - Backfilling	1 Skid Steer Loader (66 hp) operating at a load factor of 0.37 for 8 hours per day
	1 Compactor (5 hp) operating at a load factor of 0.41 for 7 hours per day
	25 mile truck import trip within SCAQMD***
	15050 total tons to be imported for backfill
	215 total sites to be addressed
	Site average of 70 tons of soil for excavation and disposal
	Two sites to be addressed per week = 538 total operation days
	20 tons per truck
	10 total acres to be disturbed
	Phase I and Phase II work to occur concurrently
	Exposed areas will be watered 3 times per day *
	Ground cover of disturbed area will be replaced *
* Transport of contaminated material to La Paz, Arizona.	
**The SMAQMD CEQA Guide, revised June 2014, attributes 74% reduction in PM emissions to replacing ground cover of disturbed area (Page 3-11).watering 3 times per day and 5% reduction of PM with	
*** Import fill material assumed to be locally sourced within the SCAQMD.	

Table 2 below summarizes the results of the estimated GHG emissions from CalEEMOD. The CalEEMOD output report is included as Attachment A.

Table 2: Project GHG Emissions Summary			
Greenhouse Gas	Total Project Emissions (pounds)	Project Daily Average Emissions (lb/day)	GWP
CO2	718173.7	1334.90	1
CH4	92.2	0.17	21
CO2e	720109.6	1338.49	NA

Analysis as to whether or not project activities would:

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

Impact Analysis:

Greenhouse gas emissions would be generated as part of the project for a limited duration (excavation, backfilling, hauling). As indicated in the Table 2 above, these activities would not produce substantial amounts of GHGs. The project would not create a new permanent source of air emissions, as defined by

SCAQMD guidelines. As such, the project related GHG emissions are not subject to the thresholds of significance that apply to the operational impacts created by new permanent sources.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

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

Impact Analysis:

The proposed project would involve relatively short duration excavation activities that would generate temporary, low-level GHG emissions. The proposed project does not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing GHG emissions.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

8. Hazards and Hazardous Materials

Project Activities Likely to Create an Impact:

- Excavation, removal and disposal of contaminated soil

Description of Baseline Environmental Conditions:

Screening sampling conducted in November 2013 on 39 properties located in the Southern and Northern Assessment Areas found lead concentrations exceeding 80 milligrams per kilogram (mg/kg). Further delineation of the extent of lead contamination in the Assessment Areas is underway.

Analysis as to whether or not project activities would:

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

Impact Analysis:

If all homes are deemed to require remediation, no more than 6,675 cubic yards of soil are anticipated to be removed and disposed of in the Northern Assessment Area and approximately 9,300 cubic yards of soil will be removed from the southern area for a total of 15,975 cubic yards of soil. The contractor will identify the disposal facility, based on characterization results, prior to removal work. The trucks/rollouts will proceed directly to the off-site disposal facility after loading and decontamination. Speed limits will be established and implemented by signs and flagmen, as necessary, to minimize dust generation and maintain a safe environment for workers and local residents, including children. All trucks hauling excavated or backfill soil will be tarped during transportation. The precautions the Contractor will utilize to prevent track-out from trucks or roll-off bins will be a decontamination area consisting of plastic sheeting. The vehicles will undergo dry decontamination methods (i.e. shovels to remove any fallen soil, brushes to loosen caked on

soil, etc... followed by HEPA vacuuming) as necessary. Following the transport vehicles departure, the Contractor will remove any residual soils from the decontamination area using the above techniques. Transport vehicle departure will be scheduled when the transport vehicle has reached its limit of weight or volume. Hazards to the public or the environment related to the transport of hazardous waste will be less than significant.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

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

Impact Analysis:

No specific studies were conducted to examine risk of upset hazards to the public and the environment. The risk of upset associated with the proposed project is low because of the level of contamination and the fact that the contaminated soil material will be transported off-site by licensed, experienced haulers. Licensed haulers are trained to understand Department of Transportation regulations and safety protocols when hauling hazardous materials in accordance with Title 49 of the Code of Federal Regulations (CFR) Parts 171-179 and 40 CFR Section 263 Sub Part C. Title 49 Parts 171-179 addresses the hazardous materials regulations and associated protocol including hazardous materials communications, emergency response information, training requirements, security plans, requirements for shipments and packages, as well as regulations specific to various forms of transportation. Sub Part C identifies the immediate action and discharge clean up measures required in the event of a hazardous waste discharge. The driver has been instructed on spill control, containment and failure procedures, who to contact in case of emergency while transporting the materials (e.g. California Highway Patrol), and how the truck is to be labeled to ensure the consistent communication of information to first responders. The remediation activities include hazards that may be caused by human error or machinery failure. Should an accidental spill occur on the highway, Department of Transportation regulations for spills will be observed. Potential receptors include anyone who comes in direct contact with the soil by way of direct skin contact, inhalation, or by ingestion. If a spill occurs, the driver of the truck will notify the local authorities for implementation of cleanup activities. Since the trucks will be appropriately labeled, any spill clean-up workers will be able to adequately don the appropriate protective gear to deal with this soil.

In the event of an emergency or spill during transport to the treatment facility, the driver of the hauling truck will use the following procedures:

- Park the vehicle in the most secure area available, away from homes, traffic, waterways, and businesses
- Stay with the vehicle until appropriate support has arrived; move a safe distance away from the vehicle or spill material if danger exists
- Notify the appropriate emergency contacts

Impacted soil spilled off-site will be properly removed and cleaned up pursuant to directions of local authorities (e.g., California Highway Patrol, city, county, etc.).

Risks associated with the dust and particulates at work area will be minimized through use of dust suppression activities and securing the property and excavation areas to prevent unauthorized access to work areas. Dust monitoring equipment will be used, if necessary, as identified in the IMWP.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

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

Impact Analysis:

There are three schools located within ¼ mile of the Southern Assessment Area including:

Loma Vista Elementary School
 Fishburn Avenue Elementary School
 Maywood Elementary
 San Antonia Elementary

There are also three schools located within ¼ mile of the Northern Assessment Area including:

Eastman Avenue Elementary School
 Robert Louis Stevenson Middle School
 Rowan Avenue Elementary School
 Volunteers of America Salazar Park Head Start

The project will involve the removal of lead contaminated soil. Project control measures described above in the project description will ensure that the soil is handled in a manner that is safe and will not expose children to hazardous materials, substances or waste.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

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

Impact Analysis:

The two assessment areas are not located on a hazardous materials site pursuant to Government Code Section 65962.5. There is no impact.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

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

Impact Analysis:

A Site Health and Safety Plan has been prepared for the project. The Health and Safety Plan identifies the location of the nearest hospital where personnel are to be taken for treatment. Project activities will not interfere with or impair the implementation of any emergency response or evacuation plan.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

References Used:

9. Hydrology and Water Quality

Project Activities Likely to Create an Impact:

- Excavation of contaminated soil
- Dust Control

Description of Baseline Environmental Conditions:

The assessment areas are in a highly urbanized area characterized by existing residential neighborhoods and surrounding commercial/industrial uses. There are no open space or natural areas in or adjacent to the assessment areas. The Los Angeles River is nearby; however, it has been channelized and entirely lined with cement through the area.

Analysis as to whether or not project activities would:

- a. Violate any water quality standards or waste discharge requirements.

Impact Analysis:

The work will require the spraying of water as a mist on the excavation areas prior to removal in order to prevent fugitive dust during construction as discussed. The amount of water will not saturate the soils, and no runoff is expected during this operation. Although not anticipated to be needed to prevent off-site migration of soil, silt socks (compost filled fabric tubes), silt fence or similar measures will be installed along the perimeter of the excavations. Water spraying during loading, if necessary, will be conducted while the transport vehicle is located on a decontamination area consisting of plastic sheeting and a water collection point provided by the Contractor. All water used for loading and/or decontamination will be captured and transported to an approved facility for treatment and disposal. Dry decontamination methods (i.e. shovels to remove any fallen soil, brushes to loosen caked on soil, etc. followed by HEPA vacuuming) are anticipated to be used on transport trucks and on excavation equipment following construction. The Contractor will provide water absorption materials to capture all water prior to leaving the property. This would include any leaks in hoses or stormwater from a rain event that may happen during construction. All captured water would be transported to an approved facility for treatment and disposal. No impact to water quality is anticipated.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

- b. Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted).

Impact Analysis:

The project will require a minimal amount of water to be used as dust suppression. The water will be sprayed as a mist in order to prevent fugitive dust. This amount of water will be minimal and will not deplete groundwater supplies or interfere with groundwater recharge. This impact will be less than significant.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

- c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on or off-site.

Impact Analysis:

The project is located on a developed urban site. There are no streams or rivers in the project vicinity and the removal of a limited amount of contaminated material will not alter the course of a stream or river. No erosion or siltation will result and there will be no impact.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

- d. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off-site.

Impact Analysis:

Project activities will be limited to excavation of contaminated soils in exposed front and back yards of existing homes. No alteration in drainage patterns or alteration of the course of a stream or river will result. No increase in surface runoff will occur as a result of remedial activities; therefore, there is no impact.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

- e. Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff.

Impact Analysis:

Project activities will be limited to excavation of contaminated soils in exposed front and back yards of existing homes. The project will ensure that water will not saturate soils. No increase in surface runoff will occur as a result of remedial activities; therefore, there is no impact.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

- f. Otherwise substantially degrade water quality.

Impact Analysis:

The project involves the excavation of limited amounts of contaminated soils and will not degrade water quality. There will be no impact as a result of project activities.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

- g. Place within a 100-year flood hazard area structures which would impede or redirect flood flows.

Impact Analysis:

The site assessment areas are located outside the 100-year flood hazard area and no structures are proposed. There will be no impact.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

- h. Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam.

Impact Analysis:

There are no levees or dams near the project area so the project will not expose people or structures to a risk of flooding. There will be no impact.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

- i. Inundation by seiche, tsunami or mudflow.

Impact Analysis:

The project is not located near a large body of water and will not result in inundation by seiche. The project is not located in the vicinity of the coastline and will not result in inundation by tsunami. The topography of the site is flat and no mudflow will result from the project. There will be no impact.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

References Used:

10. Land Use and Planning

Project Activities Likely to Create an Impact:

None.

Description of Baseline Environmental Conditions:

The Northern and Southern Assessment Areas are residential neighborhoods located in an urbanized setting. The topography is generally flat. The boundaries of the Assessment Areas and their juxtaposition to the Exide Technologies (Exide) Vernon Facility are shown on the attached Figures 1 and 2.

The surface of the Assessment Area properties generally consists of landscaping that includes trees, lawn and shrubs, flowerbeds, concrete driveways, walkways and patios. Each property is served by subsurface utilities that include electricity, gas, water, and sewer.

The Assessment Areas consist of residential developments with lot sizes approximately 5,200 square feet. Similar residential neighborhoods surround the assessment areas. There are also commercial/industrial areas and railroad tracks in proximity to the Assessment Areas.

Analysis as to whether or not project activities would:

- a. Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect.

Impact Analysis:

The project involves excavation on existing residential properties in a residential neighborhood. There will be no conflict with any land use plan, policy or regulation. There will be no impact.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

- b. Conflict with any applicable habitat conservation plan or natural community conservation plan.

Impact Analysis:

There are no habitat conservation plans or natural community conservation plans in the project area. There will be no impact.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

*References Used:***11. Mineral Resources**

Project Activities Likely to Create an Impact:

None.

Description of Baseline Environmental Conditions:

The Northern and Southern Assessment Areas are residential neighborhoods located in an urbanized setting. The topography is generally flat. The surface of the Assessment Area properties generally consists of landscaping that includes trees, lawn and shrubs, flowerbeds, concrete driveways, walkways and patios. Each property is served by subsurface utilities that include electricity, gas, water, and sewer. There are no known mineral resources on the project site.

Analysis as to whether or not project activities would:

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

Impact Analysis:

There are no known mineral resources in the Assessment Areas. There will be no impact.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 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:

No mineral resources are identified on the project site in the general plan, or other land use plan.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

*References Used:***12. Noise**

Project Activities Likely to Create an Impact:

- Excavation of impacted soil by using appropriate construction equipment (may include excavator, backhoe, and front-end loader), and loading excavated soil and debris into dump trucks
- Transportation of impacted soil and debris to appropriate off-site permitted disposal facilities
- Transportation of clean fill material from off-site locations

Description of Baseline Environmental Conditions:

The Assessment Areas are located in a developed residential area. The Northern Assessment Area is located in the unincorporated communities of Boyle Heights and East Los Angeles. The Southern Assessment Area is located within the City of Maywood. Activities will be conducted between the hours of 8:00 am and 5:00 pm for five days, Monday through Friday. Noise activities will be associated with the temporary use of excavators and truck traffic. No permanent structures, buildings or facilities will be constructed that will generate noise. Existing noise in the project area would primarily include vehicles traveling on city and county streets as well as operation of excavation equipment.

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

- a. Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.

Impact Analysis:

Project activities will be limited to weekday work between the hours of 8:00 a.m. and 5:00 p.m. Noise increase over ambient conditions will be minimal and not exceed standards set forth in local general plans, ordinances or standards of other agencies. This is a less than significant impact.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

- b. Exposure of persons to or generation of excessive groundbourne vibration or groundbourne noise levels.

Impact Analysis:

Excavation areas will be limited in size and depth, using small equipment and hand tools. No groundbourne vibration or groundbourne noise will occur. There will be no impact.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

- c. A substantial permanent increase in ambient noise levels in the vicinity above levels existing without the project.

Impact Analysis:

Activities resulting from implementation of the IMWP are temporary in nature. No permanent increase in ambient noise levels will occur. There will be no impact.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

- d. A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project.

Impact Analysis:

The Assessment Areas are located in an urban, residential/industrial area of Los Angeles County and each are within two miles of major freeways. There already exists a significant amount of ambient noise at the Assessment Areas from existing traffic and industrial activities. The project activities are temporary and

will not create a permanent increase in noise levels. Construction activities will be limited to the hours of 8 a.m. to 5 p.m., Monday through Friday, and measures will be taken to minimize the temporary increase as discussed in item (a) and (b) above. Workers will be provided with hearing protection devices. The proposed project will not substantially increase the ambient noise level above levels as noted above and the impact is less than significant.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

References Used:

13. Population and Housing

Project Activities Likely to Create an Impact:

- Excavation of impacted soil by using appropriate construction equipment (may include excavator, backhoe, and front-end loader), and loading excavated soil and debris into dump trucks
- Transportation of impacted soil and debris to appropriate off-site permitted disposal facilities
- Transportation of clean fill material from off-site locations

Description of Baseline Environmental Conditions:

The Northern Assessment Area is located in the unincorporated communities of Boyle Heights and East Los Angeles. The 2000 Census indicated that Boyle Heights had a population of 92,785 and in 2011, the population was 95% Hispanic or Latino. The median income in 2000 was \$33,235. East Los Angeles, located immediately east of Boyle Heights had a population of 126,496 as of the 2010 Census with 97.1% of the population Hispanic or Latino. The median income in 2010 was \$36,755. The Northern Assessment under consideration for this interim measure work consists of 91 residences and an area approximately 10 acres in size.

The Southern Assessment Area is located in the City of Maywood. According to the 2010 Census, the city had a population of 27,395 with 97.4% of the population Hispanic or Latino. The median income in 2010 was \$36,540. The Southern Assessment Area consists of 124 residences and is approximately 15 acres in size.

Analysis as to whether or not project activities would:

- a. Induce substantial 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 is located in an existing built out residential neighborhood. No homes or businesses are proposed and there will be no additional population growth as a result of the remedial action. There will be no impact.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

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

Impact Analysis:

Housing units will not be displaced during the remedial activities. Work will be conducted in the yards where there is a potential for contact with contaminated soil. There will be no impact.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

- c. Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere.

Impact Analysis:

The project may involve the temporary relocation of existing residents. Residents will be offered the option of relocating to a hotel during remedial activities on the property. All costs for the hotel stay will be on a direct pay basis and a per diem allowance (based on family size) for meals and incidentals while away from the residence. The per diem rate will be based on the State Government rate established for the Los Angeles area. It is anticipated that a local full service hotel from one of the major chains will be utilized with nearby restaurants for available for meals as a convenience to the residents. If the residents have pets, lodging will be provided at a hotel that allows pets. Each individual family will be consulted in order to provide the most convenience for the family. In the event that residents opt to relocate during the work, a security guard will be provided to watch the property overnight. If residents chose to remain in their home, air conditioners will be offered to them in the summer months. The air conditioners will be left in place until work at the property is completed. This will be a less than significant impact.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

References Used:

14. Public Services

Project Activities Likely to Create an Impact:

None.

Description of Baseline Environmental Conditions:

The Assessment Areas are located in a developed residential area. The Northern Assessment Area is located in the unincorporated communities of Boyle Heights and East Los Angeles. The Southern Assessment Area is located within the City of Maywood. Interim Measure work will consist of removal of contaminated soil and restoration of landscaping. Facilities are already in place and will remain.

Analysis as to whether or not project activities would:

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

- ❖ Fire protection
- ❖ Police protection

- ❖ Schools
- ❖ Parks
- ❖ Other public facilities

Impact Analysis:

No permanent structures, buildings or facilities will be constructed that will require new or expanded facilities.

Conclusion:

- Potentially Significant Impact
- Potentially Significant Unless Mitigated
- Less Than Significant Impact
- No Impact

15. Recreation

Project Activities Likely to Create an Impact:

None.

Description of Baseline Environmental Conditions:

The Assessment Areas are located in a developed residential area. The Northern Assessment Area is located in the unincorporated communities of Boyle Heights and East Los Angeles. The Southern Assessment Area is located within the City of Maywood. Interim Measure work will consist of removal of contaminated soil and restoration of landscaping.

Analysis as to whether or not project activities would:

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

Impact Analysis:

The proposed activities do not involve the construction of new housing or other facilities. There will be no increase in the use of existing recreational facilities. There will be no impact.

Conclusion:

- Potentially Significant Impact
- Potentially Significant Unless Mitigated
- Less Than Significant Impact
- No Impact

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

Impact Analysis:

The proposed activities do not involve the construction of new or expanded recreational facilities. There will be no impact.

Conclusion:

- Potentially Significant Impact
- Potentially Significant Unless Mitigated
- Less Than Significant Impact

No Impact

16. Transportation and Traffic

Project Activities Likely to Create an Impact:

- Transportation of impacted soil and debris to appropriate off-site permitted disposal facility.
- Transportation of clean fill material from off-site locations

Description of Baseline Environmental Conditions:

The Assessment Areas are located in a developed residential area. The Northern Assessment Area is located in the unincorporated communities of Boyle Heights and East Los Angeles. The Southern Assessment Area is located within the City of Maywood. Activities will be conducted between the hours of 8:00 am and 5:00 pm for five days, Monday through Friday.

Analysis as to whether or not project activities would:

- a. Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections).

Impact Analysis:

It anticipated that there will be an estimated eight trips per day. The truck haul routes are located on main thoroughfares that can be characterized as commercial industrial streets with no residences. The streets are designed to handle truck traffic and an increase of 8 trucks per day will be a less than significant impact.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

- b. Exceed, either individually or cumulatively, a level of service standard established by the country congestion management agency for designated roads or highway.

Impact Analysis:

It anticipated that there will be an estimated eight trips per day. The level of service (LOS) standard in Los Angeles County is “D.” The truck haul routes are located on main thoroughfares that can be characterized as commercial industrial streets with no residences. The streets are designed to handle truck traffic and an increase of 8 trucks per day will not exceed a level of service standard. This will be a less than significant impact.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

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

Impact Analysis:

The project will not utilize any streets that have sharp curves or dangerous intersections. There will be no impact related to design features.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

- d. Result in inadequate emergency access.

Impact Analysis:

The project will involve utilizing trucks on established streets serving mostly industrial and commercial uses. Project measures will ensure there is adequate emergency access. This is a less than significant impact.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

- e. Result in inadequate parking capacity.

Impact Analysis:

The project will work on two adjacent houses at the same time utilizing minimal equipment. There is adequate parking available to accommodate the equipment and trucks. This is a less than significant impact.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

- f. Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks).

Impact Analysis:

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

17. Utilities and Service Systems

Project Activities Likely to Create an Impact:

None.

Description of Baseline Environmental Conditions:

The Northern and Southern Assessment areas are built out residential neighborhoods located in an urbanized setting. The topography is generally flat. Utilities are already in place.

Analysis as to whether or not project activities would:

- a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board.

Impact Analysis:

There will be no wastewater generated as part of the project activities. There will be no impact.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

- b. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.

Impact Analysis:

There will be no new construction of housing and no need for new or expanded wastewater treatment facilities. There will be no impact.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

- c. Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.

Impact Analysis:

There will be no new construction of housing and no need for new or expanded wastewater treatment facilities. There will be no impact.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

- d. Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed.

Impact Analysis:

The project will have minimal temporary water needs primarily related to dust suppression during excavation activities. No new or expanded entitlements will be needed. There will be no impact.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

- e. Result in determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the projects projected demand in addition to the providers existing commitments.

Impact Analysis:

There will be increase in the need for wastewater treatment. There will be no impact.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

- f. Be served by a landfill with sufficient permitted capacity to accommodate the projects solid waste disposal needs.

Impact Analysis:

It is anticipated that the contaminated soil will be taken to a facility in Arizona. The landfill will have sufficient permitted capacity to accommodate the soil removed from the Assessment Areas. There will be no impact.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

- g. Comply with federal, state, and local statutes and regulations related to solid waste.

Impact Analysis:

Activities proposed to be completed will be in compliance with the federal, state, and local statutes and regulations related to solid waste.

Conclusion:

- Potentially Significant Impact
 Potentially Significant Unless Mitigated
 Less Than Significant Impact
 No Impact

Mandatory Findings of Significance

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

- a. The project has does not have the potential to 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, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory.
- b. The project has 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 has does not have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly.

Determination of Appropriate Environmental Document:

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

The proposed project COULD NOT HAVE a significant effect on the environment. A **Negative Declaration** will be prepared.

The proposed project COULD HAVE a significant effect on the environment. However, 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.

The proposed project MAY HAVE a significant effect on the environment. An **Environmental Impact Report** is required.

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.

The proposed project COULD HAVE a significant effect on the environment. However, all potentially significant effects (a) have been analyzed adequately in an earlier Environmental Impact Report or Negative Declaration pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier Environmental Impact Report or Negative Declaration, including revisions or mitigation measures that are imposed upon the proposed project. Therefore, nothing further is required.

REFERENCES:

DTSC; “Interim Measures Work Plan, Northern and Southern Assessment Area”; September 15, 2014.

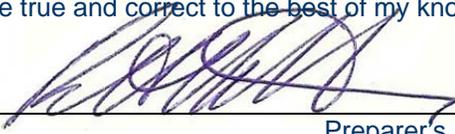
Google Earth, 2014

¹ DTSC: “DTSC Review of February 18, 2014 Off-Site Soil Sampling Report and Order, Exide Technologies, Vernon, CA (Stipulation and Order, Docket HWCA P3- 12/13-010, OAH No. 2013050540, and Corrective Action Consent Order, Docket No.:P3-01/02-010); March 10, 2014

SCAQMD Final 2012 Air Quality Management Plan.
<http://www.aqmd.gov/ceqa/handbook/signthres.pdf>

Certification:

I hereby certify that the statements furnished above and in the attached exhibits, 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.

		9/16/2014
Preparer's Signature		Date
Peter Ruttan	Project Manager	916-255-3630
Preparer's Name	Preparer's Title	Phone #
		9/16/2014
Branch or Unit Chief Signature		Date
Ed Nieto	Supervisor	916-255-3578
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