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: Boeing Torrance Southern Parcel Corrective Measures Study		CALSTARS CODING: 22120-400224-48-39
PROJECT ADDRESS: 3100 West Lomita Boulevard	CITY: Torrance	COUNTY: Los Angeles
PROJECT SPONSOR: Mark Allen	CONTACT: mark.h.allen2@boeing.com	PHONE: 818-466-8769

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):Corrective Measures Study Report

STATUTORY AUTHORITY:

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

DTSC PROGRAM/ ADDRESS:	CONTACT:	PHONE:
Corrective Action Unit 8800 Cal Center Drive Sacramento, California 95826	Wayne Lorentzen wlorentz@dtsc.ca.gov	916-255-3883

PROJECT DESCRIPTION:

The California Department of Toxic Substances Control (DTSC) is proposing to select remedies recommended in a Corrective Measures Study (CMS) Report prepared by The Boeing Company (Boeing) for the southern portion of the former Boeing facility. Selecting the remedies would allow Boeing to implement the corrective measures recommended in the CMS Report and obtain a Corrective Action Complete with Controls determination from DTSC for the southern portion of the property. If DTSC selects the remedies and the remedies are implemented, corrective action will be terminated in the southern portion of the site, and the existing Corrective Action Consent Agreement between DTSC and Boeing would be revised to include only the northern portion of the property.

Background

The site is comprised of approximately 26 acres with five buildings located on the northern portion of the site and a parking lot on the southern portion. The site is located in the City of Torrance, Los Angeles County. Commercial and industrial operations are located north and east of the site. The Torrance Memorial Medical Center is located to the west of the site, and the Torrance Municipal Airport is located to the south.

Hughes Aircraft Company began operations at the former farm site with their Electron Dynamics Division in 1967. Hughes Aircraft Company operated six waste management units at the site until 1994. The six waste management units included a vaulted solvent storage tank, two hazardous waste drum storage areas, a container storage area, a 3,000-gallon waste solvent storage tank, and a 500-gallon waste solvent storage tank. DTSC approved closure of four of the six waste management units, and Hughes Aircraft Company entered into a Corrective Action Consent Agreement in 1995 with DTSC for the investigation and cleanup of leaks from the 3,000 and 500-gallon solvent storage tanks.

Boeing purchased the Hughes Aircraft Electron Dynamics Division operations in 2000 and sold the operations to L3 Communications in 2005. Boeing sold the property to RREEF America REIT III Corporation (RREEF) in October 2006. RREEF is considering plans to split the property into northern and southern parcels.

Boeing has maintained responsibility for carrying out the activities specified in the Corrective Action Consent Agreement which includes the characterization of the site and submittal of a CMS Report to evaluate corrective measure alternatives for impacted areas. Boeing conducted investigation activities for groundwater, soil gas, soil, and indoor air, and submitted a characterization report, the Site Assessment Summary Report, dated May 14, 2007. DTSC approved the report in 2007. Boeing prepared a Health Risk Assessment for the entire site which was approved by DTSC in 2007. Boeing has submitted a CMS Report for the northern portion of the site and a CMS Report for the southern portion. DTSC has accepted the CMS Report for the southern portion (Former EDD Site Property Parceling Document) and is proposing to select the recommended remedies. DTSC will follow a similar process for the northern portion of the site and will evaluate the CMS Report for the northern portion separately.

The Site Assessment Summary Report provides the details of the site investigation. The site investigation included sampling activities for groundwater, soil, soil gas, and indoor air. All sampling activities were conducted in accordance with the United States Environmental Protection Agency's prescribed sampling procedures, SW-846. All compounds detected in groundwater, soil, soil gas, and indoor air were identified as constituents of concern and were used to develop the Human Health Risk Assessment for the entire site.

Boeing conducted a Human Health Risk Assessment to estimate potential human health risks associated with residual concentrations of chemicals detected at the site. The major parameters in the risk assessment included concentrations of chemicals in media, physical properties of the soil, exposure frequency, exposure duration, body weight, averaging time for carcinogenic effects, averaging time for non-carcinogenic effects, soil ingestion rate, skin surface area, soil to skin adherence factor, breathing rate, transfer factors for inhalation of vapors and particulates, cancer slope factors, and chronic non-cancer reference doses. These parameters and others were used to develop cumulative risk-based concentrations across the site to indicate where risk-based decisions need to be made. DTSC considers the point-of-departure to be $1x10^{-6}$ for risk-based decisions, and this value was used to determine where remedies need to be developed for the southern portion of the site.

Assumptions made in the risk assessment include the following:

Parameter		Units	Construction Worker	Commercial Worker	Hypothetical Resident	
					Adult	Child
General Exposure Parameters						
EF	Exposure frequency	d/yr	90	250	350	350
ED	Exposure duration	yr	1	25	24	6
BW	Body weight	kg	70	70	70	15
AT_c	Averaging time for carcinogenic effects	d	25,550	25,550	25,550	25,550
AT_{nc}	Averaging time for noncarcinogenic effects	d	365	9,125	8,760	2,190
Ingestion of Soil						
IR	Soil ingestion rate	mg/d	330	50	100	200
Dermal Contact with Soil						
SA	Skin surface area	cm^2	5,700	5,700	5,700	2,900
AF	Soil-to-skin adherence factor	–	0.8	0.07	0.07	0.2
Inhalation of Particulates and Vapors						
BR	Breathing rate	m^3/d	20	20	20	10

Model Input Parameter	Value Used	Rationale
Soil Properties		
Average Soil / Groundwater Temperature (Ts), °C	19	Area-specific average
Depth below grade to bottom of enclosed space floor (L_F), cm	15	Slab construction
Soil gas sampling depth below grade (Ls), cm	--	Depth at which samples were collected
Thickness of soil stratum A (h_A), cm	Ls	Depth-to-soil gas sample
Soil stratum A SCS soil type	SIC	Silty clays soil type
Stratum A soil dry bulk density, gm/cm^3	1.49	Site-specific geomean value based on soil physical property testing[a]
Stratum A soil total porosity, unitless	0.376	Site-specific geomean value based on soil physical property testing[a]
Stratum A soil water-filled porosity, cm^3/cm^3	0.289	Site-specific geomean value based on soil physical property testing[a]
Stratum B soil dry bulk density, gm/cm^3	1.55	Site-specific geomean value based on soil physical property testing[a]
Stratum B soil total porosity, unitless	0.347	Site-specific geomean value based on soil physical property testing[a]
Stratum B soil water-filled porosity, cm^3/cm^3	0.165	Site-specific geomean value based on soil physical property testing[a]
Stratum C soil dry bulk density, gm/cm^3	1.51	Site-specific geomean value based on soil physical property testing[a]
Stratum C soil total porosity, unitless	0.405	Site-specific geomean value based on soil physical property testing[a]
Stratum C soil water-filled porosity, cm^3/cm^3	0.253	Site-specific geomean value based on soil physical property testing[a]
Crack-to-total-area ratio (η), unitless	0.005	Default assumption
Commercial Building Parameters		
Enclosed space floor thickness (L_{crack}), cm	10	Default assumption
Enclosed space floor length (L_B), cm	1000	Default assumption (10 meters)
Enclosed space floor width (W_B), cm	1000	Default assumption (10 meters)
Enclosed space height (H_B), cm	366	Proposed ceiling height (12 feet or 3.66 meters)
Floor-wall seam crack width (w), cm	0.1	Default assumption
Indoor air exchange rate (ER), hour^{-1}	1	Default commercial building assumption
Average vapor flow rate into building (Qsoil), L/m	5	Based on 5 L/min per 100 m^2 of building floor space
Residential Building Parameters		
Enclosed space floor thickness (L_{crack}), cm	10	Default assumption
Enclosed space floor length (L_B), cm	1000	Default assumption (10 meters)
Enclosed space floor width (W_B), cm	1000	Default assumption (10 meters)
Enclosed space height (H_B), cm	244	Proposed ceiling height (8 feet or 2.44 meters)
Floor-wall seam crack width (w), cm	0.1	Default assumption
Indoor air exchange rate (ER), hour^{-1}	0.5	Default residential building assumption
Average vapor flow rate into building (Qsoil), L/m	5	Based on 5 L/min per 100 m^2 of building floor space

The risk assessment did not presume a use scenario, and instead was developed for both commercial and residential scenarios and for both acute and chronic exposure risk. The receptors used in the risk assessment included potential future residents, onsite construction workers, and commercial/industrial workers. The pathways used in the risk assessment included inhalation of indoor air vapors, inhalation of outdoor air vapors, inhalation of particulates in outdoor air, dermal contact with shallow soil, and incidental ingestion of shallow soils. The only complete pathway for groundwater is the infiltration of agricultural chemicals applied before 1967 and the subsequent volatilization to soil gas. Boeing conducted additional deeper sampling for these chemicals found in shallow soil and showed that the chemicals have been relatively immobile over the last 40 years and remain in shallow surface soils. The surface above these soils is paved. There are no groundwater impacts from this facility in the southern portion of the site.

With the exception of a small area along the southeast corner of the southern portion of the property (soil gas probes 1313 and 1315), no soil or soil vapor sampling location exceeds a cumulative cancer risk of 1 x 10^{-6} or a cumulative non-cancer hazard of 1 for commercial workers. The exceedance in this area is attributed to a cumulative sum of risks from compounds in soil and soil vapor. For example, tetrachloroethene was detected at 5,000,000 micrograms per cubic meter (ug/m3) and trichloroethene at 600,000 ug/m3 in soil gas in this area. Tetrachloroethene was detected at 190,000 micrograms per kilogram (ug/kg) and trichloroethene at 31,000 ug/kg in soil samples in the same area. The primary risk at these locations is from vapor intrusion to indoor air. There are currently no buildings at the site. The California Human Health Screening Levels for tetrachloroethene and tricholoroethene in shallow soil gas for commercial/industrial scenarios are 603 ug/m3 and 1,770 ug/m3 respectively. Groundwater in the southern parcel is not a potential source of TCE or PCE that could produce future soil vapors. The groundwater from the adjacent northern parcel does not flow south and is not a potential source of further TCE or PCE contamination within the southern parcel.

Although samples of lead in the southern portion of the site showed concentrations above the California Modified Preliminary Remediation Goal for residential scenarios (150 mg/kg), the concentrations of lead in this area do not exceed the United States Environmental Protection Agency's Preliminary Remediation Goal for Industrial scenarios (800 mg/kg). The maximum concentration of lead detected in soil in this area was 459 mg/kg.

The lead in soil and contaminants in soil gas would be left in place with the proposed remedies, and the land would be restricted.. If the proposed remedies are selected and successfully implemented, the corrective action at the site could be considered complete by DTSC, and DTSC may issue a Corrective Action Complete With Controls Determination. The facility boundary for corrective action under the existing consent agreement would be redrawn to exclude the project area. If contaminants in the project area are cleaned up later to residential risk-based concentrations established in the risk assessment, the property owner could request DTSC to terminate the Land Use Covenant and release the property to unrestricted use.

No regulated units, hazardous waste handling or storage, or other facility operations have ever been located on the southern portion of the property. The investigation activities resulted in the discovery of a localized area of shallow soil containing concentrations of lead that were above background levels. Polychlorinated biphenyls (PCBs), other metals, fuel-related volatile organic compounds (VOCs), petroleum hydrocarbons, and semi-volatile organic compounds were also detected sporadically in the same location. Additional sampling was conducted to determine the extent of contamination and to determine whether concentrations of these compounds were above risk-based concentrations. The analysis indicated that the concentrations of these compounds were all below commercial risk-based concentrations established in the Health Risk Assessment.

VOCs exceeding commercial risk-based concentrations were discovered in the south-east corner of the site directly adjacent to the neighboring ALCOA facility. Surface soil excavations were conducted in 2008 in accordance with ALCOA's Soil Grading Workplan and conducted under a Corrective Action Consent Agreement between ALCOA and DTSC. The excavations were conducted to remove VOC impacted soils near the surface and improve ALCOA's soil vapor extraction (SVE) system operations. ALCOA has installed the SVE system to reduce soil gas contaminant concentrations on the ALCOA property. The SVE system is located directly adjacent to the VOC impacted soils on the former Boeing property. Under DTSC oversight, ALCOA is planning to continue operation of the SVE system until a final remedy is selected for the ALCOA site.

The CMS Report includes a proposal to address the lead-contaminated soils exceeding the calculated cumulative residential risk-based concentration for lead and the VOC-impacted soils exceeding the calculated cumulative commercial risk-based concentration for specific VOCs. The CMS Report recommends implementation of institutional controls as remedies for the contaminated soils in the southern portion of the property. The recommended institutional controls include a Land Use Covenant to restrict the future use of the property, a soil vapor monitoring and contingency plan to monitor soil vapor concentrations and to conduct indoor air monitoring if concentrations increase above a hazard threshold, and a soil management plan to ensure proper handling of contaminated soils.

Project Activities

With DTSC approval, the property owner would conduct annual sampling activities at two existing semi-permanent soil vapor probes. If laboratory analysis of samples indicates that concentrations of VOCs in soil vapor exceed a calculated cumulative risk of 1×10^{-6} for commercial workers, the property owner would conduct subslab and/or indoor air sampling of VOCs in any buildings constructed less than 100 feet from the soil vapor probes. The calculated cancer risk-based concentration established in the risk assessment for commercial workers for tetracholorethene is 9,400 ug/m3 at 0 to 5 feet below surface. The calculated cancer risk-based concentration established for trichloroethene is 28,000 ug/m3. Annual sampling would continue until the neighboring property achieves cleanup goals for soil vapor or DTSC determines that at least two successive rounds of sampling indicates that no unacceptable risk remains for commercial workers. If sampling indicates that risk-based concentrations have been exceeded, the property owner will be required to implement corrective action in accordance with the Resource Conservation and Recovery Act. A new CEQA Evaluation may be required for any additional actions conducted under corrective action.

With DTSC approval, the property owner would also implement a soil management plan that would contain restrictions on the handling and management of soils on the property. DTSC and the property owner would also record a Land Use Covenant to restrict the future land use of the property to commercial and industrial use only. The Land Use Covenant would also prohibit construction of any new buildings in areas where concentrations of contaminants exceed the stated risk-based concentrations. The Land Use Covenant would also include a designation of restricted areas for locations of future buildings and a requirement to provide access to responsible

parties for soil vapor sampling. The institutional controls would not restrict groundwater use or utility workers. An Operation and Maintenance Agreement would not be required, but annual Land Use Covenant inspections would be required by DTSC.

ENVIRONMENTAL IMPACT ANALYSIS:

1. Aesthetics

Project Activities Likely to Create an Impact: None

Description of Baseline Environmental Conditions: The site is located in a commercial area bordered by a municipal airport on the south and the Torrance Memorial Medical Center on the west. Industrial and commercial sites border the remaining areas. The site and surrounding areas consist almost entirely of buildings and paved parking areas. Roadway corridors run along the North (Lomita Boulevard) and the South (Skypark Drive) boundaries of the property. Figure 1 is a satellite image of the Boeing site and the surrounding areas. Site visibility from Skypark Drive is limited by tall Oleanders planted along the fenceline. Site visibility from Lomita Boulevard is limited by the buildings constructed on the northern portion of the property.

Analysis as to whether or not project activities would:

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

Impact Analysis: The project activities consist of institutional controls and sampling from existing soil vapor probes. These activities would not effect any scenic vistas.

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 nearest officially designated state scenic highway is State Route 2 in the Angeles National Forest which is 28 miles from the site. Route 110, a historic parkway, is located 19 miles north of the site. A portion of State Route 1 in Los Angeles County is eligible as a State Scenic Highway but has not been officially designated as such. The project activities consist of institutional controls and sampling from existing soil vapor probes. These activities would not damage scenic resources.

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 site is a paved parking area for the northern portion of the property. Visibility from Skypark Drive is limited by tall bushes planted along the fenceline. The project activities consist of institutional controls and sampling from existing soil vapor probes. These activities would not degrade the visual character or quality of the site and its surroundings.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

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

Impact Analysis: The project activities consist of institutional controls and sampling from existing soil vapor probes. Sampling activities would be conducted annually from existing soil vapor probes. These activities would not create a new source of substantial light glare.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

References Used:

California Department of Transportation (Caltrans), California Scenic Highway Program, available online at www.dot.ca.gov/hq/LandArch/scenic_highways/index.htm, July 23, 2009.

2. Agricultural Resources

Project Activities Likely to Create an Impact: None

Description of Baseline Environmental Conditions: As shown on Figure 2, the site is zoned M2 for Heavy Manufacturing by the City of Torrance. There are no agricultural resources located near the site.

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: As shown on Figure 3, the site is not designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance on the Los Angeles Important Farmland Map prepared by the California Department of Conservation. The project activities consist of institutional controls and sampling from existing soil vapor probes. These activities would not convert important farmland to non-agricultural use.

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: As shown on Figure 2, the site is zoned M2 for Heavy Manufacturing by the City of Torrance. There are no agricultural zonings near the site. As shown on Figure 4, the site is not under contract with the Williamson Act. The project activities consist of institutional controls and sampling from existing soil vapor probes. These activities would not conflict with existing zoning or agricultural use, or Williamson Act contracts.

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: As shown on Figure 2, the site is zoned M2 for Heavy Manufacturing by the City of Torrance. There are no agricultural zonings near the site. The project activities consist of institutional controls and sampling from existing soil vapor probes. These activities would not cause changes that would result in conversion of farmland to non-agricultural uses.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

References Used:

California Department of Conservation, Division of Land Resource Protection, Los Angeles County Important Farmland 2006, available online at ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2006/los06.pdf, July 23, 2009.

California Department of Conservation, Division of Land Resource Protection, California Williamson Act 2006, available online at ftp://ftp.consrv.ca.gov, July 23, 2009.

3. Air Quality

Project Activities Likely to Create an Impact: None

Description of Baseline Environmental Conditions: The Torrance area average high temperatures range from 66 to 79 degrees Fahrenheit with summer highs in the low 80's and winter lows in the high 40's. The average rainfall is 12.5 inches per year.

Analysis as to whether or not project activities would:

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

Impact Analysis: The South Coast Air Quality Management District adopted the 2007 Air Quality Management Plan on June 1, 2007. The Plan will be updated in 2010. The project activities consist of institutional controls and sampling from existing soil vapor probes. Sampling would be conducted annually, and emissions from mobilization of sampling equipment and subsequent shipment of samples for analysis would not exceed significance thresholds and would be less than significant. These activities would not conflict with or obstruct implementation of the 2007 Air Quality Management Plan.

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: Currently, the South Coast Air Basin is designated as non-attainment for 8-hour ozone, PM-10, and PM-2.5. The project activities consist of institutional controls and sampling from existing soil vapor probes. Sampling would be conducted annually, and emissions from mobilization of sampling equipment and subsequent shipment of samples for analysis would not exceed significance thresholds and would be less than significant. These activities would 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: Currently, the South Coast Air Basin is designated as non-attainment for 8-hour ozone, PM-10, and PM-2.5. The project activities consist of institutional controls and sampling from existing soil vapor probes. Sampling would be conducted annually, and emissions from mobilization of sampling equipment and subsequent shipment of samples for analysis would not exceed significance thresholds and would be less than significant. These activities would not result in a cumulatively considerable net increase of any criteria pollutant.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☒ Less Than Significant Impact
☐ No Impact

d. Expose sensitive receptors to substantial pollutant concentrations.

Impact Analysis: The project activities consist of institutional controls and sampling from existing soil vapor probes. Sampling would be conducted annually, and emissions from mobilization of sampling equipment and subsequent shipment of samples for analysis would be less than significant. These activities would not expose sensitive receptors to substantial pollutant concentrations.

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: The project activities consist of institutional controls and sampling from existing soil vapor probes. Sampling would be conducted annually, and emissions from mobilization of sampling equipment and subsequent shipment of samples for analysis would be less than significant. These activities would not create objectionable odors.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

f. Result in human exposure to Naturally Occurring Asbestos (see also Geology and Soils, f.).

Impact Analysis: The project activities consist of institutional controls and sampling from existing soil vapor probes. Disturbance of soils is not anticipated, and Naturally Occurring Asbestos is not present at the site. The entire site is paved. Project activities would not result in human exposure to Naturally Occurring Asbestos.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

References Used:

4. Biological Resources

Project Activities Likely to Create an Impact: None

Description of Baseline Environmental Conditions: The site is located in an industrial area of Torrance. The site consists of a paved parking area with limited vegetation.

Analysis as to whether or not project activities would:

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

Impact Analysis: The site consists of a paved parking area. Wildlife is not present at the site. The project activities consist of institutional controls and sampling from existing soil vapor probes. Project activities would not effect any species.

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 Game or U.S. Fish and Wildlife Service.

Impact Analysis: The site consists of a paved parking area. Riparian habitats and natural communities are not present at the site. The project activities consist of institutional controls and sampling from existing soil vapor probes. Project activities would not effect any riparian habitat or sensitive natural communities.

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: The site consists of a paved parking area. Wetlands are not present at the site. The project activities consist of institutional controls and sampling from existing soil vapor probes. Project activities do not include excavation or construction and would not effect federally protected wetlands.

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 site consists of a paved parking area. Fish or wildlife species are not present at the site. Wildlife corridors and wildlife nursery sites are not present at the site. The project activities consist of institutional controls and sampling from existing soil vapor probes. Project activities would not interfere with the movement of any fish or wildlife species, or with wildlife corridors or nursery sites.

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: The site consists of a paved parking area. The project activities consist of institutional controls and sampling from existing soil vapor probes. Project activities do not include removal of trees or other biological resources and would not conflict with local policies protecting biological resources.

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: The site consists of a paved parking area. The project activities consist of institutional controls and sampling from existing soil vapor probes. Project activities do not include removal of trees or other biological resources and would not conflict with local policies protecting biological resources.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

References Used:

5. Cultural Resources

Project Activities Likely to Create an Impact: None

Description of Baseline Environmental Conditions: The site consists of a paved parking area, and no structures are present. Prior to the industrial use of the site, the land was used for farming. Project activities do not include excavation of soils.

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 site is not listed in the California Register of Historical Resources and contains no buildings or structures. The site has not been associated with California historical events nor with the lives of important persons in the past. The site does not embody distinctive characteristics of historical significance and has not yielded historical information. The project activities consist of institutional controls and sampling from existing soil vapor probes. Project activities do not include demolition or excavation of soils.

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: The site has not been associated with California historical events nor with the lives of important persons in the past. The site does not embody distinctive characteristics of historical significance and has not yielded historical information. The project activities consist of institutional controls and sampling from existing soil vapor probes. Project activities do not include demolition or excavation of soils.

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: The site does not embody distinctive characteristics of historical significance and has not yielded historical information. The project activities consist of institutional controls and sampling from existing soil vapor probes. Project activities do not include demolition or excavation of soils.

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 activities consist of institutional controls and sampling from existing soil vapor probes. Project activities do not include demolition or excavation of soils.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

References Used:

6. Geology and Soils

Project Activities Likely to Create an Impact: None

Description of Baseline Environmental Conditions: The site consists of a flat paved parking area. Project activities do not include excavation of soils.

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 do not include soil excavation or demolition of any structure. Project activities are limited to institutional controls and sampling from existing vapor probes.

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: Project activities do not include soil excavation or demolition of any structure. Project activities are limited to institutional controls and sampling from existing vapor probes.

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: Project activities do not include soil excavation or demolition of any structure. Project activities are limited to institutional controls and sampling from existing vapor probes.

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: Project activities do not include soil excavation or demolition of any structure. Project activities are limited to institutional controls and sampling from existing vapor probes.

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 waste water disposal systems where sewers are not available for the disposal of water.

Impact Analysis: Project activities do not include soil excavation or installation of tank systems. Project activities are limited to institutional controls and sampling from existing vapor probes.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

f. Be located in an area containing naturally occurring asbestos (see also Air Quality, f.).

Impact Analysis: Project activities do not include soil excavation or demolition of any structure. The site is a paved parking area. Project activities are limited to institutional controls and sampling from existing vapor probes.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

References Used:

7. Hazards and Hazardous Materials

Project Activities Likely to Create an Impact: None

Description of Baseline Environmental Conditions: Hazardous materials are not handled on the southern portion of the property; they are stored and handled on the northern portion of the property where site operations occur. Soils containing hazardous concentrations of tetrachloroethylene (PCE) and trichloroethylene (TCE) in soil vapor exist at depth near the southeast corner of the site. Soils containing hazardous concentrations of lead are also present under the paved parking area.

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: Project activities do not include excavation or extraction of contaminated soils. The soils containing lead would be left under pavement and would be subject to a soil management plan. The soils containing PCE and TCE are expected to be remediated through operation of a soil vapor extraction system on the adjoining property. These soils would also be subject to a soil management plan. Project activities would also include annual soil vapor sampling from existing soil vapor probes on the property. The transportation and disposal of soil gas samples would create a less than significant hazard to the public or environment.

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: Project activities would consist of institutional controls including a soil management plan to ensure existing contamination is contained. Hazards to the public from accidental release of collected soil gas samples would be less than significant.

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: The project activities consist of institutional controls and sampling from existing soil vapor probes. Hazardous emissions associated with sampling activities would be less than significant.

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 project activities consist of institutional controls and sampling from existing soil vapor probes. Emissions from annual sampling activities would be a less than significant hazard to the public or environment.

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: The project activities consist of institutional controls and sampling from existing soil vapor probes. Project activities would not impair implementation of any emergency response or evacuation plan.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

References Used:

8. Hydrology and Water Quality

Project Activities Likely to Create an Impact: None

Description of Baseline Environmental Conditions: Groundwater is present at approximately 85 feet below ground surface at the site. The site is located in the West Coast Basin. The Gage and Silverado aquifers underlie the site. Groundwater generally flows to the east. The Pacific Ocean and Harbor Lake are located within 3 miles of the site.

Analysis as to whether or not project activities would:

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

Impact Analysis: The Los Angeles Regional Water Quality Control Board has designated the West Coast Basin for beneficial uses of municipal, industrial, and agricultural water supplies. The project activities consist of institutional controls and sampling from existing soil vapor probes. Lead contaminated soils would remain under cap and would be subject to a soil management plan. Soil sampling was conducted for lead to determine whether concentrations of lead in soil would pose a significant health risk from dermal contact with soil or leaching of lead to groundwater. The sampling analysis indicated that lead concentrations were below commercial risk-based concentrations and would not pose significant risk from groundwater. The depth to groundwater is 85 feet below ground surface, and the area of contamination is beneath a paved cover. Under DTSC oversight, the adjoining property owner to the east, ALCOA, has implemented a pilot study for soil vapor extraction. The system will operate until a final remedy is established for ALCOA. Operation of the system is expected to result in decreasing concentrations of VOCs in soil gas near the southeast corner of the property and in groundwater at the ALCOA property until concentrations are below risk-based

levels. Significant leaching of VOC contaminated soils in the southeast corner to groundwater is unlikely due to the continued operation of the soil vapor extraction system by ALCOA. There are no known groundwater impacts in the project area.

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 deficient 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 activities consist of institutional controls and sampling from existing soil vapor probes. Project activities do not include groundwater extraction and would not substantially deplete groundwater supplies or interfere with groundwater recharge.

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 activities consist of institutional controls and sampling from existing soil vapor probes. Project activities do not include excavation or disturbance of soils and would not alter existing drainage patterns.

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: The project activities consist of institutional controls and sampling from existing soil vapor probes. Project activities do not include excavation or disturbance of soils and would not alter existing drainage patterns.

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: The project activities consist of institutional controls and sampling from existing soil vapor probes. Project activities do not include excavation and would not create or contribute runoff water.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

f. Otherwise substantially degrade water quality.

Impact Analysis: The Los Angeles Regional Water Quality Control Board has designated the West Coast Basin for beneficial uses of municipal, industrial, and agricultural water supplies. The project activities consist of institutional controls and sampling from existing soil vapor probes. Lead contaminated soils would remain under cap and would be subject to a soil management plan. Significant leaching of lead contaminated soils to groundwater is unlikely due to the immobile nature of lead, the depth to groundwater of 85 feet below ground surface, and the paved cover. Under DTSC oversight, the adjoining property owner to the east, ALCOA, has implemented a pilot study for soil vapor extraction. The system will operate until a final remedy is established for ALCOA. Operation of the system is expected to result in decreasing concentrations of VOCs in soil gas and groundwater near the southeast corner of the property until concentrations are below risk based levels. Significant leaching of VOC contaminated soils in the southeast corner to groundwater is unlikely due to the continued operation of the soil vapor extraction system by ALCOA.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☒ Less Than Significant Impact
☐ No Impact

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

Impact Analysis: The project activities consist of institutional controls and sampling from existing soil vapor probes. Project activities do not include construction or alteration of structures and would not impede flood flows.

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: The project activities consist of institutional controls and sampling from existing soil vapor probes. Project activities do not include construction or alteration of structures and would not expose people or structures to flooding.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

i. Inundation by sieche, tsunami or mudflow.

Impact Analysis: The project activities consist of institutional controls and sampling from existing soil vapor probes. Project activities would not result in inundation by sieche, tsunami or mudflow.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact

☒ No Impact

References Used:

Los Angeles Regional Water Quality Control Board, Water Quality Control Plan, available online at http://www.swrcb.ca.gov, July 27, 2009.

9. Land Use and Planning

Project Activities Likely to Create an Impact: None

Description of Baseline Environmental Conditions: As shown on Figure 2, the site is zoned M2 for Heavy Manufacturing by the City of Torrance.

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 activities consist of institutional controls and sampling from existing soil vapor probes. Project activities would not conflict with any applicable land use plan, policy, or regulation of an agency.

   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: The project activities consist of institutional controls and sampling from existing soil vapor probes. Project activities would not conflict with any applicable habitat conservation plan or natural community conservation plan.

   Conclusion:
   ☐ Potentially Significant Impact
   ☐ Potentially Significant Unless Mitigated
   ☐ Less Than Significant Impact
   ☒ No Impact

References Used:

10. Mineral Resources

Project Activities Likely to Create an Impact: None

Description of Baseline Environmental Conditions: As shown on Figure 2, the site is zoned M2 for Heavy Manufacturing by the City of Torrance. There are no known significant mineral resources located at the 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: The project activities consist of institutional controls and sampling from existing soil vapor probes. Project activities would not result in the loss of availability of known mineral resources.

   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: The project activities consist of institutional controls and sampling from existing soil vapor probes. Project activities would not result in the loss of availability of mineral resource recovery sites.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

References Used:

11. Noise

Project Activities Likely to Create an Impact: None

Description of Baseline Environmental Conditions: As shown on Figure 2, the site is zoned M2 for Heavy Manufacturing by the City of Torrance.

Analysis as to whether or not project activities would:

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: The project activities consist of institutional controls and sampling from existing soil vapor probes. Project activities are not likely to generate excessive noise levels. Noise generated from sampling equipment and vehicles mobilized annually would be less than significant.

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: The project activities consist of institutional controls and sampling from existing soil vapor probes. Project activities would not generate groundbourne vibration or noise.

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: The project activities consist of institutional controls and sampling from existing soil vapor probes. Project activities are not likely to generate excessive noise levels. Noise generated from sampling equipment and vehicles mobilized annually would be less than significant.

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 project activities consist of institutional controls and sampling from existing soil vapor probes. Project activities are not likely to generate excessive noise levels. Noise generated from sampling equipment and vehicles mobilized annually would be less than significant.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☒ Less Than Significant Impact
☐ No Impact

References Used:

12. Population and Housing

Project Activities Likely to Create an Impact: None

Description of Baseline Environmental Conditions: As shown on Figure 2, the site is zoned M2 for Heavy Manufacturing by the City of Torrance.

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 activities consist of institutional controls and sampling from existing soil vapor probes. Project activities do not include construction of infrastructure and would not induce substantial population growth.

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: The project activities consist of institutional controls and sampling from existing soil vapor probes. Project activities do not include demolition of infrastructure and would not displace existing housing.

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 activities consist of institutional controls and sampling from existing soil vapor probes. Project activities do not include construction or demolition of infrastructure and would not displace people.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

References Used:

13. Public Services

Project Activities Likely to Create an Impact: None

Description of Baseline Environmental Conditions: As shown on Figure 2, the site is zoned M2 for Heavy Manufacturing by the City of Torrance.

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: The project activities consist of institutional controls and sampling from existing soil vapor probes. Project activities do not include alteration of roads or structures, and annual sampling activities would not result in a significant increase of workers to the area. Project activities will not result in adverse physical impacts to any government facilities or services.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

References Used:

14. Recreation

Project Activities Likely to Create an Impact: None

Description of Baseline Environmental Conditions: As shown on Figure 2, the site is zoned M2 for Heavy Manufacturing by the City of Torrance.

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 project activities consist of institutional controls and sampling from existing soil vapor probes. Annual sampling activities would not result in a significant increase of workers to the area. Project activities will not result in a significant increased use of existing neighborhoods, parks, or recreational facilities.

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 project activities consist of institutional controls and sampling from existing soil vapor probes. Annual sampling activities would not result in a significant increase of workers to the area. Project activities do not include construction of facilities and would not require construction or expansion of recreational facilities.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

References Used:

15. Transportation and Traffic

Project Activities Likely to Create an Impact: None

Description of Baseline Environmental Conditions: As shown on Figure 2, the site is zoned M2 for Heavy Manufacturing by the City of Torrance.

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: The project activities consist of institutional controls and sampling from existing soil vapor probes. Annual sampling activities would not result in a significant increase of workers to the area and would not cause a substantial increase in traffic.

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: The project activities consist of institutional controls and sampling from existing soil vapor probes. Annual sampling activities would not result in a significant increase of workers to the area and would not cause a substantial increase in traffic.

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 activities consist of institutional controls and sampling from existing soil vapor probes. Project activities do not include alteration of any structure or roadway feature and would not increase hazards due to a design feature.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

d. Result in inadequate emergency access.

Impact Analysis: The project activities consist of institutional controls and sampling from existing soil vapor probes. Project activities do not include alteration of any structure or roadway feature and would not result in inadequate emergency access.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

e. Result in inadequate parking capacity.

Impact Analysis: The project activities consist of institutional controls and sampling from existing soil vapor probes. Project activities do not include alteration of any structure or roadway feature and would not result in a significant increase of workers to the area. Annual sampling activities would not significantly decrease available parking, and the project would not result in inadequate parking capacity.

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: The project activities consist of institutional controls and sampling from existing soil vapor probes. Project activities do not include alteration of any structure or roadway feature and would not result in a significant increase of workers to the area. The project would not conflict with adopted transportation policies, plans or programs.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

References Used:

16. Utilities and Service Systems

Project Activities Likely to Create an Impact: None

Description of Baseline Environmental Conditions: As shown on Figure 2, the site is zoned M2 for Heavy Manufacturing by the City of Torrance.

Analysis as to whether or not project activities would:

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

Impact Analysis: The project activities consist of institutional controls and sampling from existing soil vapor probes. Annual sampling activities would not generate substantial amounts of wastewater.

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: The project activities consist of institutional controls and sampling from existing soil vapor probes. Annual sampling activities would not generate substantial amounts of wastewater.

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: The project activities consist of institutional controls and sampling from existing soil vapor probes. Project activities would not require construction or expansion of new storm water drainage facilities.

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 activities consist of institutional controls and sampling from existing soil vapor probes. Annual sampling activities would not require substantial amounts of water and would not require new or expanded entitlements.

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: The project activities consist of institutional controls and sampling from existing soil vapor probes. Annual sampling activities would not generate substantial amounts of wastewater.

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: The project activities consist of institutional controls and sampling from existing soil vapor probes. Annual sampling activities would not generate substantial amounts of solid waste.

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: The project activities consist of institutional controls and sampling from existing soil vapor probes. Annual sampling activities would not generate substantial amounts of solid waste and would comply with all applicable regulations.

Conclusion:
☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

References Used:

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.

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.

Wayne Lorentzen	Project Manager	(916)255-3883
Preparer's Name	Preparer's Title	Phone #

Preparer's Signature — 11-4-09 Date

Rizgar Ghazi	Unit Chief	(916) 255-6665
Unit Chief Name	Unit Chief Title	Phone #

Unit Chief Signature — 11-4-09 Date

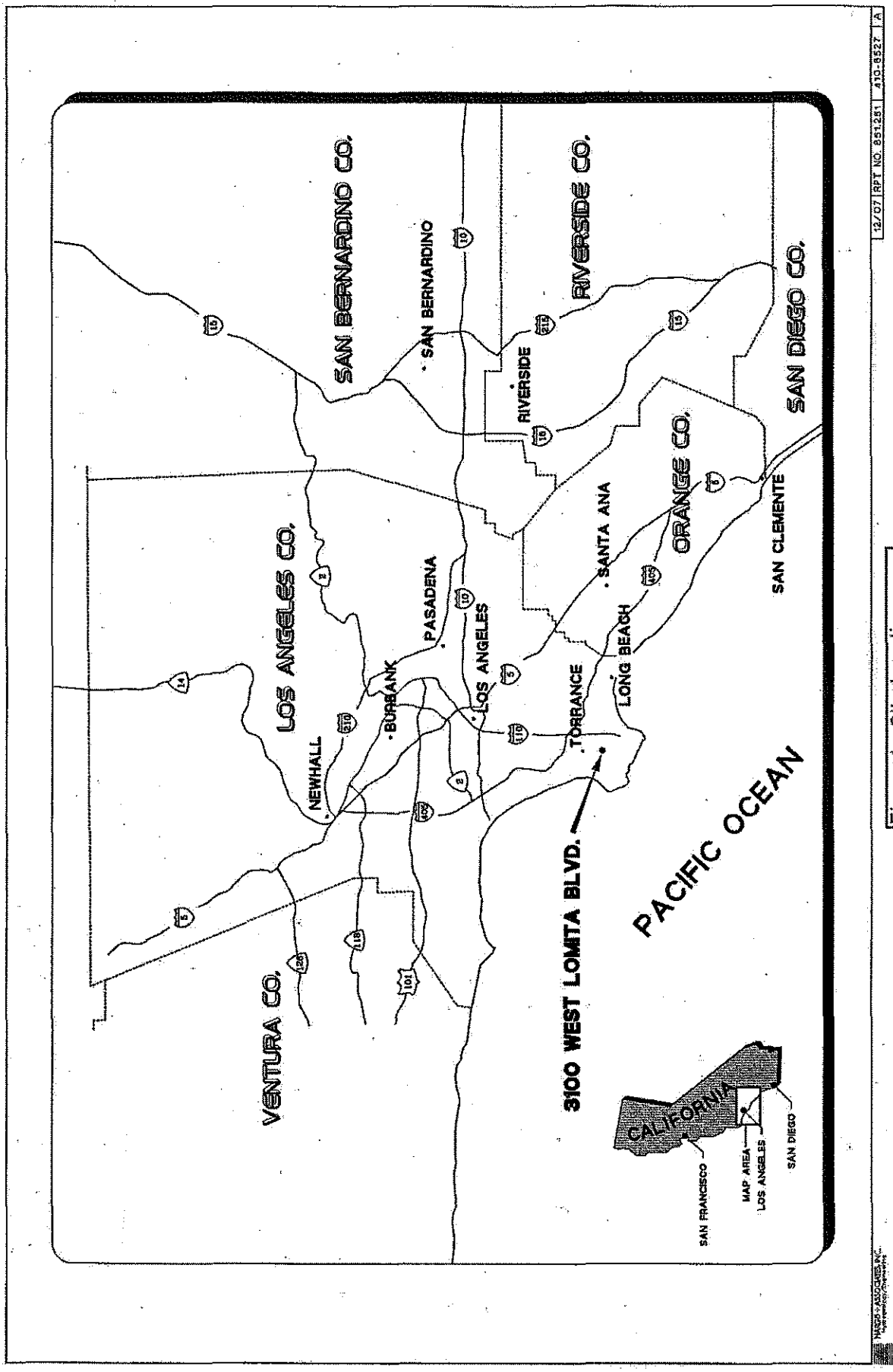
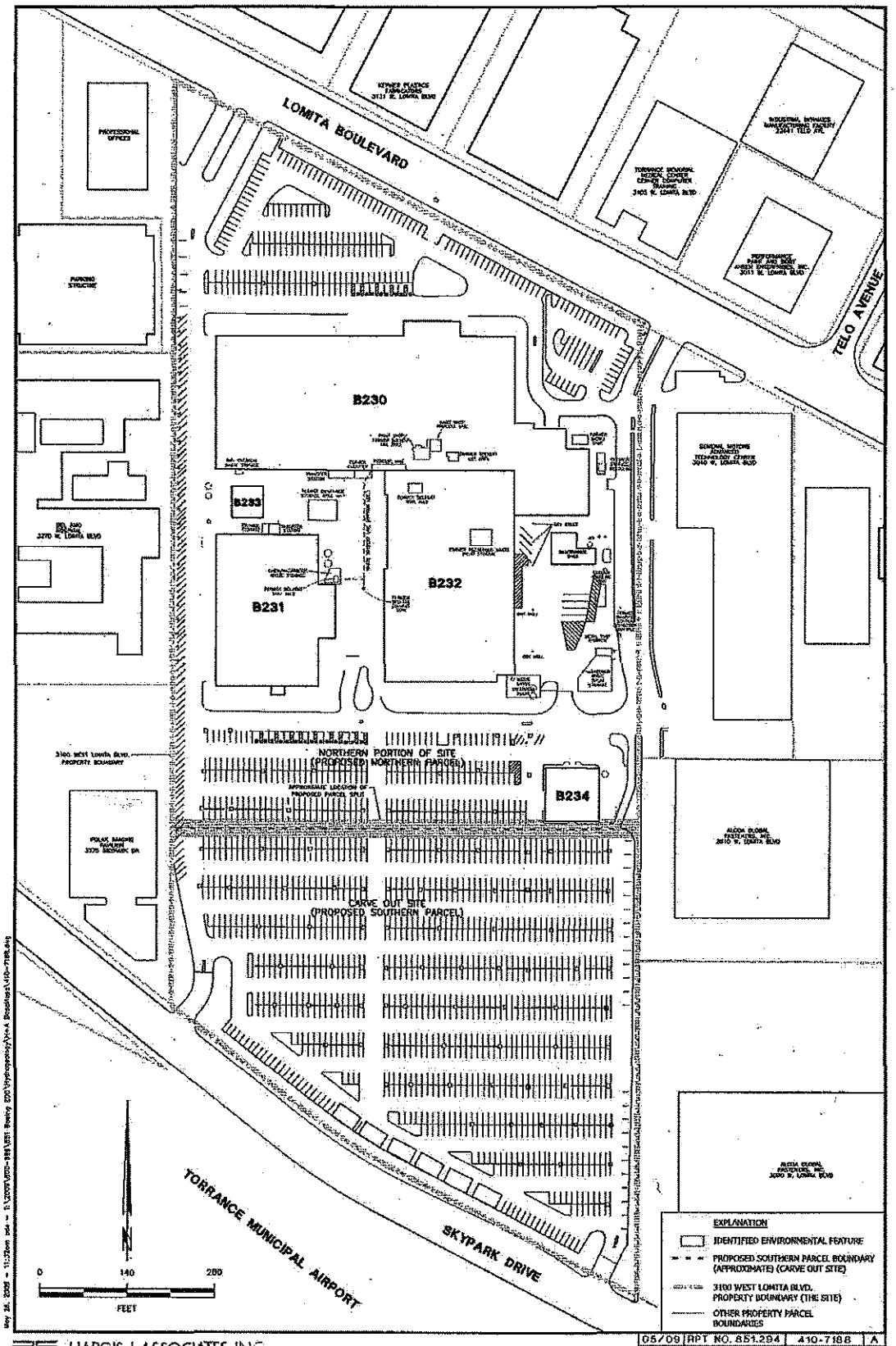


Figure 1 - Site Location



HARGIS + ASSOCIATES, INC
Hydrogeology/Engineering

Figure 2 - Plot Plan