

Appendix A: NOP and Initial Study and Comment Letters

NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL IMPACT REPORT

Date: March 19, 2014
To: State Clearinghouse
Office of Planning and Research
1400 Tenth Street
Sacramento, CA 95814

ORIGINAL FILED

MAR 19 2014

LOS ANGELES, COUNTY CLERK

and

Responsible Agencies, Trustee Agencies, Federal Agencies, and Interested Organizations and Individuals (see Attachment 1 for list of agencies)

Lead Agency: State of California Regional Water Quality Control Board, Los Angeles Region

Contact: Paula Rasmussen, Assistant Executive Officer
Regional Water Quality Control Board
320 West 4th Street, Suite #200
Los Angeles, CA 90013
Phone: (213) 213-576-6791
E-mail: paula.rasmussen@waterboards.ca.gov

Project Title: Former Kast Property Tank Farm Site Remediation Project - Environmental Impact Report

Project Applicant: Shell Oil Products US

Project Location: The Former Kast Property Tank Farm (Site) is a 44-acre site located in Carson, California. The site is bounded to the north by East 244th Street, Lomita Boulevard to the south, Marbella Avenue to the west, and Panama Avenue to the east (see Figure 1 attached). The Site currently is a residential neighborhood known as the Carousel Tract. Lomita Boulevard forms the jurisdictional boundary between the City of Los Angeles and the City of Carson (see Figure 2 attached).

Project Description: See Attachment 2 for a description of the Former Kast Property Tank Farm Remediation Project.

Purpose of the Notice of Preparation: The California Environmental Quality Act (CEQA) specifies that a public agency must prepare an Environmental Impact Report (EIR) for any project that it proposes to carry out or approve that may have a significant direct or indirect impact on the environment (Public Resources Code Section 21100[a]). The California Regional Water Quality Control Board, Los Angeles Region (Los Angeles Water Board) is the lead agency for the Former Kast Property Tank Farm Site Remediation Project. The Los Angeles Water Board has determined that this project may have a significant impact on the environment and has determined that an EIR will be necessary to fully evaluate the potential environmental effects.

Comments on the Notice of Preparation: Responsible agencies, trustee agencies, Federal agencies, Native American Tribes, and interested organizations and individuals are encouraged to submit comments regarding the scope and content of the Draft EIR for the Los Angeles Water Board's consideration. This Notice of Preparation (NOP) is being circulated for the required 30-day comment period. Comments on this NOP should be submitted as soon as possible and must be received no later than 5:00 p.m. on April 18, 2014. Please send written comments to: Dr. Teklewold Ayalew, Los Angeles Water Board Project Manager, 320 W. 4th Street, Suite 200, Los Angeles, CA 90013, or electronically to teklewold.ayalew@waterboards.ca.gov.

Los Angeles County Registrar / Recorder
12400 Imperial Highway, Norwalk, CA
(800)201-8999

Business Filings

NORWALK

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Wednesday, March 19, 2014 9:24 AM

Item(s)

<u>Fee</u>	<u>Qty</u>	<u>Total</u>
NoP - County Posting Fee 2014073096	1	\$75.00
Total		\$75.00

Total Documents: 1

Customer payment(s):

Prior studies, technical reports, the CEQA Initial Study and other documents related to the proposed project are available for review on the internet at <http://www.swrcb.ca.gov/rwqcb4/Kast/index.shtml> and at the following location(s):

Carson Public Library
151 E. Carson St.
Carson, CA 90745-2797
(310) 830-0901

Tuesday - Thursday: 10 am - 8 pm, Saturday:
8 am - 6 pm, Monday/Friday/Sunday: Closed

California Regional Water
Quality Control Board
Los Angeles Region
320 W. 4th Street, Suite 200
Los Angeles, CA 90013
(213) 576-6600

Electronic copies of the documents are also available on the Regional Board's website at:

<http://www.waterboards.ca.gov/losangeles/> under "Announcements"

Contact: If you have any questions or wish to discuss the project, please contact:

Susana Lagudis
Public Participation Specialist
Los Angeles Regional
Water Quality Control Board
(213) 576-6694
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Dr. Teklewold Ayalew
Project Manager
Los Angeles Regional Water Quality
Control Board
(213) 576-6739
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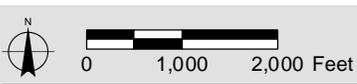
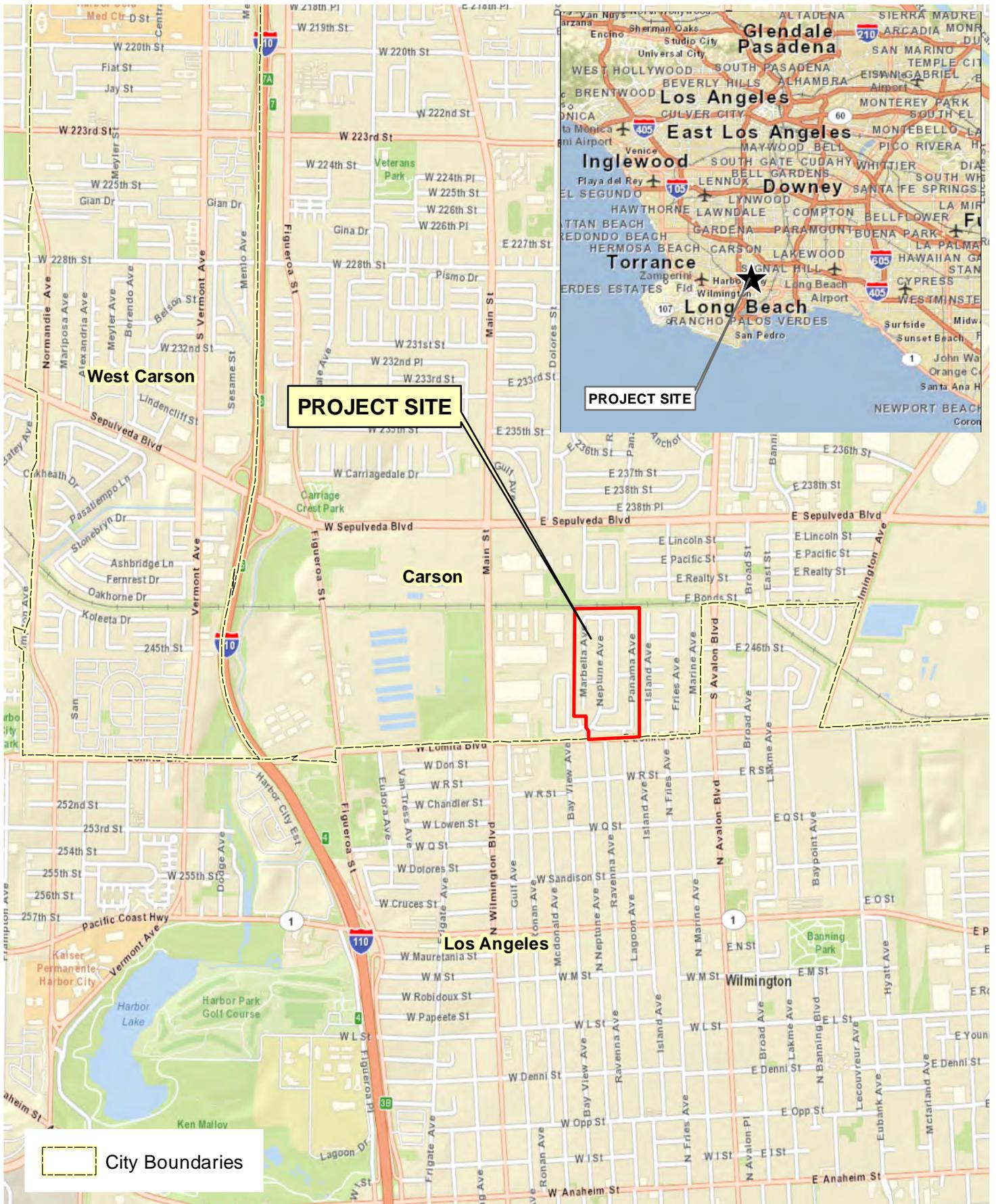
Information for the Disabled and Hearing Impaired

Persons with hearing or speech impairments can contact us by using the California Relay Service Telecommunications Device for the Deaf (TDD). TDD is reachable only from phones equipped with a TDD Device. HEARING IMPAIRED REPLAY SERVICE: TDD to voice 1-(800)-735-2929; voice to TDD 1-(800)-735-2922.

Environmental Effects To Be Evaluated in the Draft EIR

The purpose of an EIR is to identify and consider the potentially significant adverse environmental effects of a proposed project and identify measures that can reduce, avoid, or mitigate significant adverse impacts. The Los Angeles Water Board has conducted consultations with interested parties, including an inter-agency scoping conference call held on September 11, 2013, a written public comment period from September 9 through October 8, 2013 related to the Site-Specific Cleanup Goals, and a Community Open House conducted on September 24, 2013 at the Carson Community Center. In addition, the Los Angeles Water Board prepared an Initial Study on the Draft RAP, which is available at <http://www.swrcb.ca.gov/rwqcb4/Kast/index.shtml>. See Attachment 2 for a Project Description. Based on input received from previous public meetings and the Initial Study, the Los Angeles Water Board has determined that the proposed project may have a significant impact on the following resource areas:

- Air Quality
- Greenhouse Gas
- Geology and Soils
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Noise
- Transportation/Traffic
- Utilities (Solid Waste)

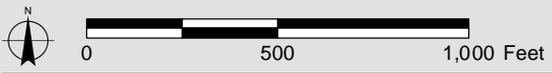


Regional and Location Map

FIGURE

1

KastSite RAP
Source: ESRI Street Map, 2009; PCR Services Corporation, 2013.



Aerial Photograph

KastSite RAP
 Source: Microsoft, 2010; PCR Services Corporation, 2014.

FIGURE
2

ATTACHMENT 1
DISTRIBUTION LIST FOR NOP - AGENCIES AND RPS

Hard Copy

State of California
Office of Planning and Research
1400 Tenth Street
Sacramento, CA 95814

California Emergency Management Agency
4671 Liberty Avenue
Los Alamitos, CA. 90720

Native American Heritage Commission
1550 Harbor Blvd., Suite 100
West Sacramento, CA. 95691

CalTrans
P.O. Box 942873
Sacramento, CA. 94273-0001

Electronic Distribution:

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United States House of Representative
ericf.boyd@mail.house.gov

State of California Office of Environmental Health Hazard Assessment
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State of California Department of Toxic Substances Control
Robert.Romero@dtsc.ca.gov
Wendy.Arano@dtsc.ca.gov

County of Los Angeles Board of Supervisors
kkatona@bos.lacounty.gov
rtahara@bos.lacounty.gov
vharris@bos.lacounty.gov

Los Angeles County Department of Public Health
abellomo@ph.lacounty.gov
clandowski@ph.lacounty.gov
crangan@ph.lacounty.gov
eramirez@ph.lacounty.gov

Attachment 1 – Distribution List for NOP – Agencies and RPs

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City of Carson

ktruong@carson.ca.us

Mayor Jim Dear

jdear@carson.city.us

South Coast Air Quality Management District

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Diamond Bar, CA 91765-4178

Ian MacMillan, Program Supervisor,

Inter-Governmental Review, Planning, Rule Development & Area Sources

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zaft@caldwell-leslie.com

ATTACHMENT 2 PROJECT DESCRIPTION

Site History

The Kast Property Tank Farm was owned and operated by Shell Oil Company (Shell) from 1924 through 1966. In 1966, Shell sold the Site to Lomita Development Company (Lomita), an affiliate of Richard Barclay and Barclay-Hollander-Curci, which developed the property into a residential neighborhood. The Site included three crude oil storage reservoirs with a total capacity of 3.5 million barrels. Reservoirs had concrete-lined bottoms and sidewalls with frame roofs on wood posts, surrounded by earth levees averaging 20 feet in height. Demolition of the three crude oil reservoirs by the Lomita began in 1966. Site redevelopment into a single family residential neighborhood began in approximately 1967, referred to as the Carousel Tract.

In 2008, residual oil was discovered in soil and groundwater at the Site. Subsequently, the Los Angeles Water Board issued orders to Shell requiring investigation and cleanup of the Site pursuant to the Porter-Cologne Water Quality Control Act (Porter-Cologne Act, California Water Code §§13000 et seq.). Comprehensive multi-media Site investigations have been underway since 2008 and have included assessments of soil, soil vapor, sub-slab soil vapor, indoor air, and groundwater impacts. To date, investigations have been conducted in city streets within the Carousel Tract, at 270 of the 285 residential properties in the Carousel Tract, the adjacent Monterey Pines and Island Avenue Tracts, the adjacent railroad right-of-way north of the Site, and at the Wilmington Middle School.

In 2011 the Los Angeles Water Board issued a Cleanup and Abatement Order (CAO) that required Shell to propose and submit a Remedial Action Plan (RAP) for the cleanup of the Carousel Tract and conduct additional site characterization and remediation pilot tests. Primary constituents of concern are methane, benzene and petroleum hydrocarbons. Shell has completed the additional site characterization and remediation pilot tests and submitted a proposed RAP, a Human Health Risk Assessment (HHRA), and a Feasibility Study Report that are currently under review by the Los Angeles Water Board. The RAP proposes how the Site will be cleaned up to achieve Site-Specific Cleanup Goals, how long the cleanup will take, and how the waste in the soil, soil vapor, and groundwater will be managed.

Proposed Project

The proposed project is the approval of the RAP and requires environmental review in compliance with the California Environmental Quality Act (CEQA). The Los Angeles Water Board will be evaluating the potential environmental impacts associated with the implementation of the RAP, in particular, the short-term impacts associated with the possible cleanup or control methods to be used and the extent of the cleanup. Shell evaluated several different methods during pilot tests for site cleanup, including:

- Soil vapor extraction (SVE);
- Excavation of soils impacted by petroleum hydrocarbons;
- Bioventing to biodegrade petroleum hydrocarbons in shallow soils;
- In-Situ chemical oxidation using ozone gas for cleanup of shallow soil; and
- Other technologies for cleanup of constituents of concern (COCs) in groundwater.

The proposed site remedy in the RAP includes shallow soil excavation, installation and long-term operation of a SVE and bioventing system, sub-slab vapor mitigation, recovery of light non-aqueous phase liquid (LNAPL) hydrocarbons from groundwater wells, monitored natural attenuation of groundwater, and implementation of a soil management plan. The proposed remediation activities are described as follows:

- Excavation of shallow soils is proposed to occur at impacted residential properties identified based on the HHRA completed for the project. Excavation would be conducted in landscaped and hardscaped areas of

Attachment 2 – Project Description

identified residences (e.g., uncovered patios, walkways, etc.). Following excavation, hardscape and landscaping would be restored to like conditions. Based on findings of the HHRA and distribution of total petroleum hydrocarbon concentrations, approximately 180-185 properties have been identified for remedial excavation.

- Installation and operation of a SVE/bioventing system is proposed to address volatile petroleum hydrocarbons, volatile organic compounds (VOCs), and methane in soil vapor and soils in areas beneath existing paved areas and concrete foundations of homes, soils remaining below the depth of excavation, and the deeper vadose zone. SVE wells and piping would be installed in City streets and on residential properties. The treatment system equipment would either be located onsite or offsite at a yet to be determined location.
- Installation of a system is proposed to vent soil vapor from beneath the slabs of approximately 30 properties based on the HHRA completed for the project.
- Recovery of LNAPL to the extent technologically and economically feasible using dedicated pumps installed in the wells is proposed to remove LNAPL that has accumulated in two monitoring wells (MW-3 and MW-12) located in City streets. The pumping would be conducted periodically (currently monthly).

Environmental Checklist Form

1. Project Title: Former Kast Property Tank Farm Site Remedial Action Plan
2. Lead Agency Name and Address: Los Angeles Regional Water Quality Control Board, 320 West 4th Street, Suite 200, Los Angeles, CA 90013
3. Contact Person and Phone Number: Paula Rasmussen, Assistant Executive Officer, (213)-576-6607
4. Project Location: City of Carson, CA: the Former Kast Property Tank Farm (Site) is a 44 acre site located in Carson, California. The Site is bounded to the north by East 244th Street, Lomita Boulevard to the south, Marbella Avenue to the west, and Panama Avenue to the east (see Figure 1 attached). The Site currently is a residential neighborhood known as the Carousel Tract (see Figure 2 attached). Lomita Boulevard forms the jurisdictional boundary between the City of Los Angeles and the City of Carson.
5. Project Sponsor's Name and Address:
Shell Oil Products US,
Attn: Douglas Weimer
20945 S. Wilmington Ave
Carson, CA 90810
6. General Plan Designation: Low Density Residential
7. Zoning: Residential
8. Description of Project: (Describe the whole action involved, including but not limited to later phases of the project, and any secondary, support, or off-site features necessary for its implementation. Attach additional sheets if necessary.)
The project is the Los Angeles Regional Water Quality Control Board's (Water Board's) approval of a Remedial Action Plan (RAP) for the cleanup of the Site submitted by Shell in response to a Cleanup and Abatement Order (CAO) issued by the Water Board in 2011. Primary constituents of concern (COCs) are methane, benzene and petroleum hydrocarbons. Additional site characterization investigations, remediation pilot tests, a Human Health Risk Assessment (HHRA) and a Feasibility Study have been completed for the Site. Additionally, Site-specific Cleanup Goals (SSCGs) for soil, soil vapor, and groundwater were established in response to the Regional Board's Review of the Revised Site-Specific Cleanup Goal Report and Directive dated January 23, 2014. The Former Kast Property Tank Farm Site Remediation Project, i.e., the RAP, has been proposed to remediate the site with the intent of achieving the SSCGs.
See Attachment A, Project Description, for a more detailed description.
9. Surrounding Land Uses and Setting: Briefly describe the project's surroundings:
The Site includes a residential community known as the Carousel Tract in an urban area within the southern portion of the City of Carson. Residential uses are located to the north, east, and south of the Site. Commercial and light manufacturing uses are located adjacent to the northwestern portion of the Site with residential uses adjacent to the southwestern portion of the Site. The BNSF railroad right-of-way is on the northern boundary of the Site. The Wilmington Middle School is located approximately 600 feet from the southwest corner of the Site.
10. Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement.)
South Coast Air Quality Management District (SCAQMD), the City of Carson, and the Occupational Safety and Health Administration (OSHA).

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

- | | | |
|--|---|--|
| <input type="checkbox"/> Aesthetics | <input type="checkbox"/> Agriculture and Forestry Resources | <input checked="" type="checkbox"/> Air Quality |
| <input type="checkbox"/> Biological Resources | <input type="checkbox"/> Cultural Resources | <input checked="" type="checkbox"/> Geology /Soils |
| <input checked="" type="checkbox"/> Greenhouse Gas Emissions | <input checked="" type="checkbox"/> Hazards & Hazardous Materials | <input checked="" type="checkbox"/> Hydrology / Water Quality |
| <input type="checkbox"/> Land Use / Planning | <input type="checkbox"/> Mineral Resources | <input checked="" type="checkbox"/> Noise |
| <input type="checkbox"/> Population / Housing | <input type="checkbox"/> Public Services | <input type="checkbox"/> Recreation |
| <input checked="" type="checkbox"/> Transportation/Traffic | <input checked="" type="checkbox"/> Utilities / Service Systems | <input checked="" type="checkbox"/> Mandatory Findings of Significance |

DETERMINATION: (To be completed by the Lead Agency) On the basis of this initial evaluation:

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





Signature _____ Printed Name _____ Date _____

Signature _____ Printed Name _____ Date _____

EVALUATION OF ENVIRONMENTAL IMPACTS:

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

Issues:

I. AESTHETICS -- Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>Discussion: The proposed remediation would occur in various locations within an existing residential neighborhood. Since the proposed work will be on residential properties and public streets, residents at this area will have a view and therefore there may be aesthetic impact on a temporary basis. Existing landscaping will be replaced in kind upon completion of excavation and soil vapor extraction (SVE) system piping installation activities.</p>				
<p>However, there are no scenic vistas or designated state scenic highways in the project area. No historic buildings are located on the site. The remediation activities would result in temporary changes to the visual environment in the residential neighborhood due to the staging of materials and equipment on site during excavation and installation of remediation systems. Equipment that may be used on the site include drill rigs, backhoes, mini-excavators, rubber-tired loaders, water buffalo trailers and soil vapor extraction equipment. Stockpiling of excavated soils would be minimized and if possible excavated soils would be loaded and transported off site the same day. Although the project would create minor short-term changes to the visual character during implementation of the remedy, the disturbed area would be restored and the visual character of the site and surroundings would not be substantially degraded.</p>				

II. AGRICULTURE AND FOREST RESOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. -- Would the project:</p>				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non- agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

II. AGRICULTURE AND FOREST RESOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>Discussion: The site is a residential development in a highly urban area with no agriculture or forest resources. The project would not conflict with existing zoning for agricultural use or convert agricultural or forest land to non-agricultural or non-forest use. Therefore, no impact would occur.</p>				

III. AIR QUALITY -- Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. -- Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Expose sensitive receptors to substantial pollutant concentrations?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Create objectionable odors affecting a substantial number of people?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p>Discussion: The Site is located within the jurisdiction of the South Coast Air Quality Management District (SCAQMD). The implementation of the RAP would result in the release of volatile organic compounds (VOCs) and/or dust due to excavation of soils impacted with VOC and semi volatile organic compounds (SVOC) and SVE system piping and bioventing installation and operation. The project proponent will be required to comply with applicable SCAQMD rules and permits to mitigate air quality impacts. Air quality impacts and feasible mitigation will be assessed in the EIR to be prepared for the project.</p>				

IV. BIOLOGICAL RESOURCES -- Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Discussion: The project site is a residential development in a highly urbanized area. The site does not contain riparian habitat, a sensitive natural community, federally protected wetlands, migratory wildlife corridors, or native wildlife nursery sites.				

V. CULTURAL RESOURCES -- Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Cause a substantial adverse change in the significance of a historical resource as defined in § 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Discussion: There are no known historic, archaeological, paleontological or unique geologic resources that exist at the site or near the site as described in a technical report entitled Cultural Resources Investigations, Former Kast Property, Carson, California, Site Cleanup No. 1230, Site ID 2040330 (URS, 2011). The remediation would result in excavation of shallow soils. However, given that the site has been previously disturbed with the removal/demolition of the reservoirs and development of homes and remediation activities would occur in these already disturbed areas, the likelihood of encountering cultural resources is considered low. Therefore, there would be no known significant cultural resources impacted by the project.				

VI. GEOLOGY AND SOILS -- Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Discussion: The project would remediate impacted soil in an existing residential development. The exposure of people or structures to adverse effects associated with ground shaking, ground failure, liquefaction, expansive soils, impacts and mitigation related to soil erosion and soil stability will be assessed in the EIR to be prepared for the project.				

VII. GREENHOUSE GAS EMISSIONS -- Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Discussion: Implementation of the RAP will involve the use of equipment used in soil removal excavation, SVE and bioventing wells installation, SVE piping trench excavation, loading and transporting of soil, SVE system compound construction, SVE system operation, and personnel vehicle movement that will generate greenhouse gas emissions (i.e., carbon dioxide) from combustion of fossil fuels in engine-powered equipment.				
Impacts and mitigation related to GHG emissions will be assessed in the EIR to be prepared for the project.				

VIII. HAZARDS AND HAZARDOUS MATERIALS -- Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Discussion: Implementation of the RAP will involve excavation of impacted soil and soil vapor extraction (SVE) of volatile organic compounds that are or may be considered hazardous.				
Items a – d: Impacts and mitigation related to potential exposure to hazardous materials will be assessed in the EIR to be prepared for the project. The nearest school is the Wilmington Middle School located approximately 600 feet southwest from the southwest corner of the site. Therefore, these issues will be evaluated in the EIR that will be prepared for the project.				
Items e and f: The nearest airport to the site is the Torrance Municipal Airport, located over 3.3 miles to the west of the site. Therefore, no impacts would occur and no further evaluation is necessary.				
Item g: Lane closures needed during the soil excavation portion of the remedy would be done in accordance with the Traffic Management Plan and Encroachment Permits from the City of Carson. These temporary lane closures are not expected to interfere with emergency access or emergency evacuation plans. There may be temporary street blockage for several minutes at a time as trucks manuever to dump loads (backfill soil as an example), but no long-term closures are expected. Drilling and trenching in the streets for well and piping installation would be required for installation of the soil vapor extraction system. Similar to installation of water and sewer lines, there may be short-term blockages of driveways to individual residential properties for less than a day. Trenching that interferes with access would be covered with steel plates to allow access at night and if construction activities are delayed. Therefore, impacts would be less than significant and no further evaluation is necessary.				

IX. HYDROLOGY AND WATER QUALITY -- Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Violate any water quality standards or waste discharge requirements?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Otherwise substantially degrade water quality?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
i) 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
j) Inundation by seiche, tsunami, or mudflow?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Discussion: The site is not located in a 100-year floodplain and implementation of the RAP would not change drainage patterns within the Tract. The implementation of the RAP would not result in a substantial alteration of existing drainage patterns, nor would it increase the rate or amount of surface runoff such that flooding would result. Potential impacts to storm water may occur if storm water is exposed to contaminated soil during excavation activities. However, implementation of required best management practices would mitigate this potential impact. Impacts relative to water quality (Items a. and f.) will be assessed in the EIR to be prepared for the project.				

X. LAND USE AND PLANNING -- Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

X. LAND USE AND PLANNING -- Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b) 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Discussion: The implementation of the RAP would not change the existing land use within the Carousel Tract. Therefore, the project would have no impact with regard to land use and planning.				

XI. MINERAL RESOURCES -- Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in the loss of availability of a locally- important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Discussion: The site has no known mineral resources and implementation of the RAP would not change the availability of mineral resources at the site. Therefore, no impact to mineral resources would occur and no further evaluation is necessary.				

XII. NOISE -- Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Exposure of persons to or generation of excessive ground-borne vibration or ground-borne noise levels?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

XII. NOISE -- Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>Discussion: The implementation of the RAP may result in temporary changes in noise and vibration levels. Noise producing equipment that may be used over the course of the project includes construction vehicles, excavation equipment, power tools, vacuum blowers and off-gas treatment units. Specific drilling and excavation equipment has not been selected at this time. The use of equipment on-site during soil removal excavation, SVE piping trench excavation, SVE well installation, as well as the temporary increase in construction vehicles, would result in a change to the existing noise levels at the Site.</p> <p>Items a., b., and d.: Impacts and mitigation related to potential noise and vibration exposure will be assessed in the EIR to be prepared for the project.</p> <p>Item c.: The implementation of the RAP would not result in a substantial permanent increase in ambient noise levels in the vicinity since the cleanup is a short-term project. Thus, long-term noise analysis is not warranted. However, Item d. will be evaluated in the EIR as indicated below.</p> <p>Items e. and f.: The nearest airport to the site is the Torrance Municipal Airport, located over 3.3 miles to the west of the site. There is no private airstrip within the vicinity of the site. Therefore, no noise impacts relative to airports would occur and no further evaluation is necessary.</p>				

XIII. POPULATION AND HOUSING -- Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>Discussion: The remediation project has no growth-inducing element and the project would not result in any impacts to population or housing. Population growth would not be affected and displacement of housing would not occur as the excavation would be conducted in landscaped and hardscaped areas of identified residences (e.g., uncovered patios, walkways, etc.). While some temporary relocation of residents may be required during excavation activities, there are a substantial number of hotel/motel rooms in the area and construction of replacement housing is not expected. Therefore, no significant impact with regards to population and housing would occur under the recommended project scope and no further analysis of the issue is necessary.</p>				

XIV. PUBLIC SERVICES -- Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Discussion: The project would not generate an increase in the demand for public services as the demand for public services is generally associated with population or employment growth. No new housing would be constructed that would generate a need for additional schools or parks. The RAP has no component or activity that would cause substantial adverse physical impacts requiring changes or impacts to fire, police, schools, parks or other public services facilities. The nature and extent of the proposed project would not generate a need for any new or physically altered governmental facilities. Therefore, no impact to public services would occur.				

XV. RECREATION -- Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Discussion: No recreational facilities are on the project site and project activities would not require new/expanded recreational facilities or increase the use of existing facilities. The nature and extent of the proposed project would not generate a need for any new or physically altered recreational facilities. Therefore, no impact relative to recreation would occur and no further analysis is necessary.				

XVI. TRANSPORTATION/TRAFFIC -- Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that result in substantial safety risks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>Discussion: Items a., e., and f.: Implementation of the RAP would result in short-term, temporary traffic. Due to the nature of the project, conflicts with adopted policies, plans or programs regarding the circulation system or alternative transportation facilities would not occur because these plans address the long-term status and maintenance of the circulation systems. As such, impacts would be less than significant and no further analysis of the plans is necessary.</p> <p>Item b.: Implementation of the RAP would require the exportation of impacted soil from the site and would therefore, generate truck trips. Thus, construction activities could adversely impact the circulation system. A traffic study will be prepared and will be included and summarized in the EIR to be prepared for the project.</p> <p>Item c: As indicated under Section VIII, Hazards and Hazardous Materials, the nearest airport to the site is the Torrance Municipal Airport, located over 3.3 miles to the west of the site. Therefore, no impacts with regard to air traffic patterns would occur and no further evaluation is necessary.</p> <p>Item d: The project would not result in any changes to the existing circulation system. Therefore, the project would not increase hazards due to a design feature and no further evaluation is necessary.</p>				

XVII. UTILITIES AND SERVICE SYSTEMS -- Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
g) Comply with federal, state, and local statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion: Items a.-c. and e.: The implementation of the RAP would not include the development of uses that would generate new wastewater flows. The Project does not propose a change in land use that would result in greater average daily flows than are currently produced. Thus, no impacts regarding wastewater would occur with Project implementation. Further analysis of this issue in the EIR is not necessary. Potential impacts regarding runoff during the proposed remediation activities are addressed in Section IX, Hydrology and Water Quality, above.

Item d: The project could result in a marginal increase in water demand during the implementation of the RAP over what currently is experienced at the site. However, the amount of water usage is expected to be nominal as it would be limited primarily to watering down the site for dust control and irrigation of newly planted vegetation, and it would be short-term, lasting only through the duration of the project. It is expected that the City's municipal water sources can accommodate the project's water requirement. Furthermore, upon completion of the RAP, land uses are not expected to change from current uses, and therefore, no change to water demand would result that would generate a long-term effect to available water supplies provided by the City. As such, a less than significant impact would occur related to water supplies. Further analysis of this issue in the EIR is not necessary.

Items f. and g.: The impacted soil that would be excavated at the site would be disposed of at a facility that can accept such waste. The landfill disposal capacity for the materials will be assessed in the EIR to be prepared for the project. The project would comply with federal, state, and local statutes and regulations related to solid waste. Therefore, no further evaluation of consistency with the regulations would be necessary.

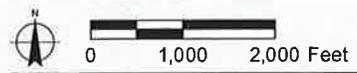
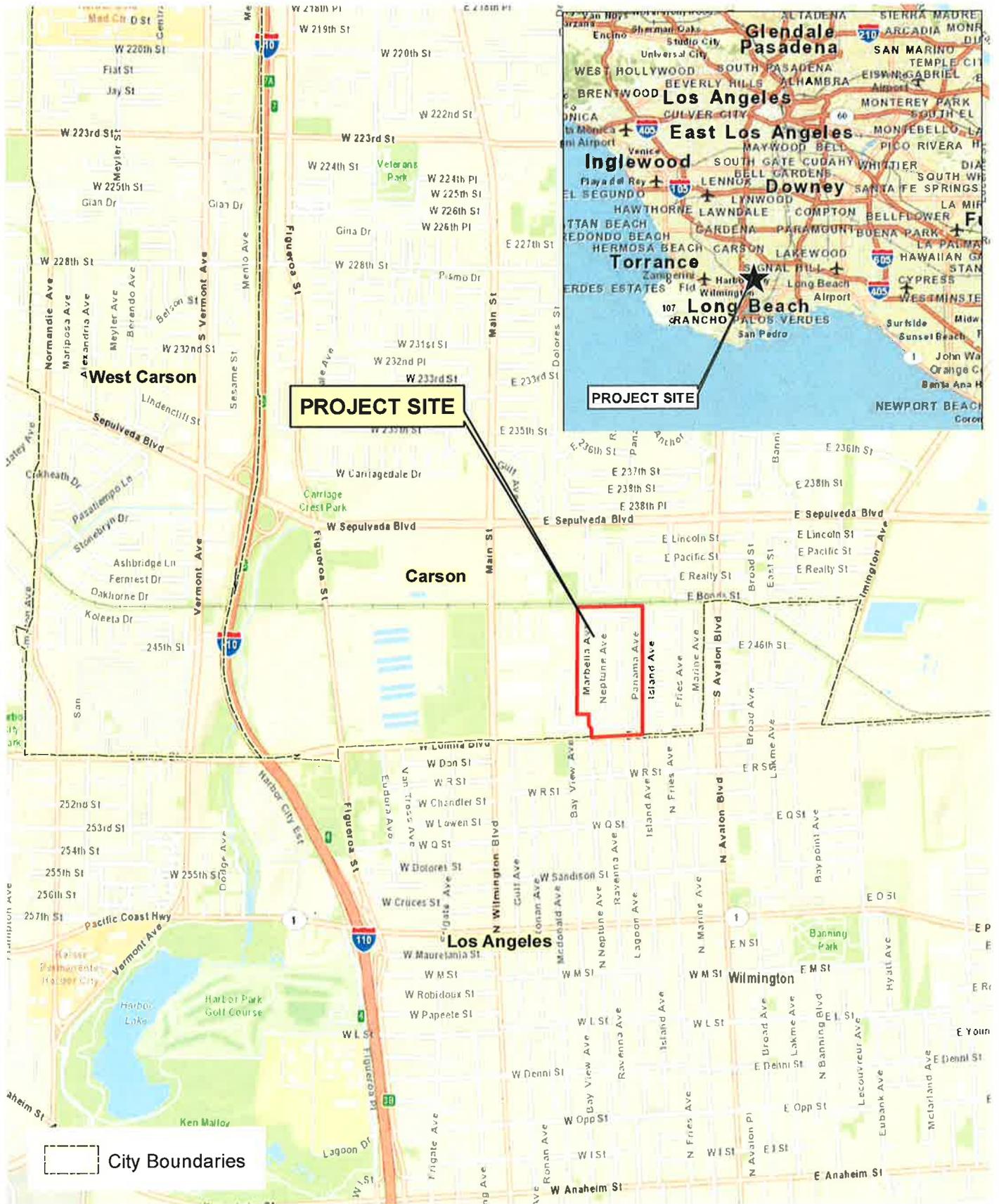
XVIII. MANDATORY FINDINGS OF SIGNIFICANCE	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, 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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion: Item a.: As analyzed in this Initial Study, the project could result in environmental impacts that would have the potential to degrade the quality of the environment. As such, an EIR will be prepared to further analyze and document the project's potentially significant impacts.

Item b.: The project is not growth inducing and would not itself result in an increase in area population, employment, or new infrastructure. The issues relevant to this project are localized and primarily limited to the immediate vicinity of the site, with the exception of impacts regarding air quality, greenhouse gas emissions, noise, and truck traffic. Cumulative impacts for these issues will be assessed in the EIR to be prepared for the project.

Item c.: Based on the preceding responses, the project could result in environmental effects that could result in substantial adverse impacts to human beings, either directly or indirectly, which requires further analysis within the EIR.

Note: Authority cited: Sections 21083 and 21083.05, Public Resources Code. Reference: Section 65088.4, Gov. Code; Sections 21080(c), 21080.1, 21080.3, 21083, 21083.05, 21083.3, 21093, 21094, 21095, and 21151, Public Resources Code; Sundstrom v. County of Mendocino, (1988) 202 Cal.App.3d 296; Leonoff v. Monterey Board of Supervisors, (1990) 222 Cal.App.3d 1337; Eureka Citizens for Responsible Govt. v. City of Eureka (2007) 147 Cal.App.4th 357; Protect the Historic Amador Waterways v. Amador Water Agency (2004) 116 Cal.App.4th at 1109; San Franciscans Upholding the Downtown Plan v. City and County of San Francisco (2002) 102 Cal.App.4th 656.



Regional and Location Map

FIGURE

1

KastSite RAP
Source: ESRI Street Map, 2009; PCR Services Corporation, 2013.



Project Site
 City Boundary



Aerial Photograph

FIGURE

2

KastSite RAP
 Source: Microsoft, 2010; PCR Services Corporation, 2014.

ATTACHMENT A

PROJECT DESCRIPTION

Site History

The Kast Property Tank Farm was owned and operated by Shell Oil Company (Shell) from 1924 through 1966. In 1966, Shell sold the Site to Lomita Development Company (Lomita), an affiliate of Richard Barclay and Barclay-Hollander-Curci, which developed the property into a residential neighborhood. The Site included three crude oil storage reservoirs with a total capacity of 3.5 million barrels. Reservoirs had concrete-lined bottoms and sidewalls with frame roofs on wood posts, surrounded by earth levees averaging 20 feet in height. Demolition of the three crude oil reservoirs by the Lomita began in 1966. Site redevelopment into a single family residential neighborhood began in approximately 1967, referred to as the Carousel Tract.

In 2008, residual oil was discovered in soil and groundwater at the Site. Subsequently, the Los Angeles Water Board issued orders to Shell requiring investigation and cleanup of the Site pursuant to the Porter-Cologne Water Quality Control Act (Porter-Cologne Act, California Water Code §§13000 et seq.). Comprehensive multi-media Site investigations have been underway since 2008 and have included assessments of soil, soil vapor, sub-slab soil vapor, indoor air, and groundwater impacts. To date, investigations have been conducted in city streets within the Carousel Tract, at 270 of the 285 residential properties in the Carousel Tract, the adjacent Monterey Pines and Island Avenue Tracts, the adjacent railroad right-of-way north of the Site, and at the Wilmington Middle School.

In 2011 the Los Angeles Water Board issued a Cleanup and Abatement Order (CAO) that required Shell to propose and submit a Remedial Action Plan (RAP) for the cleanup of the Carousel Tract and conduct additional site characterization and remediation pilot tests. Primary constituents of concern are methane, benzene and petroleum hydrocarbons. Shell has completed the additional site characterization and remediation pilot tests and submitted a proposed RAP, a Human Health Risk Assessment (HHRA), and a Feasibility Study Report that are currently under review by the Los Angeles Water Board. The RAP proposes how the Site will be cleaned up to achieve Site-Specific Cleanup Goals, how long the cleanup will take, and how the waste in the soil, soil vapor, and groundwater will be managed.

Proposed Project

The proposed project is the approval of RAP and requires environmental review in compliance with the California Environmental Quality Act (CEQA). The Los Angeles Water Board will be evaluating the potential environmental impacts associated with the implementation of the RAP, in particular, the short-term impacts associated with the possible cleanup or control methods to be used and the extent of the cleanup. Shell evaluated several different methods during pilot tests for site cleanup, including:

- Soil vapor extraction (SVE);
- Excavation of soils impacted by petroleum hydrocarbons;
- Bioventing to biodegrade petroleum hydrocarbons in shallow soils;
- In-Situ chemical oxidation using ozone gas for cleanup of shallow soil; and
- Other technologies for cleanup of constituents of concern (COCs) in groundwater.

The proposed site remedy in the RAP includes shallow soil excavation, installation and long-term operation of a SVE and bioventing system, sub-slab vapor mitigation, recovery of light non-aqueous phase liquid (LNAPL) hydrocarbons from groundwater wells, monitored natural attenuation of groundwater, and implementation of a soil management plan. The proposed remediation activities are described as follows:

- Excavation of shallow soils is proposed to occur at impacted residential properties identified based on the HHRA completed for the project. Excavation would be conducted in landscaped and hardscaped areas of identified residences (e.g., uncovered patios, walkways, etc.). Following excavation, hardscape and

Attachment A – Project Description

landscaping would be restored to like conditions. Based on findings of the HHRA and distribution of total petroleum hydrocarbon concentrations, approximately 180-185 properties have been identified for remedial excavation.

- Installation and operation of a SVE/bioventing system is proposed to address volatile petroleum hydrocarbons, volatile organic compounds (VOCs), and methane in soil vapor and soils in areas beneath existing paved areas and concrete foundations of homes, soils remaining below the depth of excavation, and the deeper vadose zone. SVE wells and piping would be installed in City streets and on residential properties. The treatment system equipment would either be located onsite or offsite at a yet to be determined location.
- Installation of a system is proposed to vent soil vapor from beneath the slabs of approximately 30 properties based on the HHRA completed for the project.
- Recovery of LNAPL to the extent technologically and economically feasible using dedicated pumps installed in the wells is proposed to remove LNAPL that has accumulated in two monitoring wells (MW-3 and MW-12) located in City streets. The pumping would be conducted periodically (currently monthly) and where a significant reduction in current and future risk to groundwater will result.



CITY OF CARSON

October 8, 2013

Mr. Sam Unger, Executive Officer
California Regional Water Quality Control Board
Los Angeles Region
320 West Fourth Street, Suite 200
Los Angeles, CA 90013

Subject: Proposed California Environmental Quality Act (CEQA) Scoping Comments
CAO R-4-2011-046 Shell Oil Kast Tank Farm Site

Dear Mr. Unger,

In response to the Los Angeles Regional Water Quality Control Board's (Regional Board) request for comments on the scope of the CEQA document, the City of Carson respectfully submits the following comments:

Following the discovery in 2008 of wide-spread contamination in the Carousel Tract, the Regional Board issued a Cleanup and Abatement Order No. R-4-2011-046 directing Shell Oil Company to investigate the Carousel Tract (former Kast Tank Farm Property) and provide remedial action to cleanup and abate the contamination from the former tank farm. The CEQA document will evaluate the types of cleanup and the extent of cleanup and is expected to fully evaluate air quality, traffic and transportation, geology and soils, greenhouse gas emissions, hydrology and water quality, noise, public services and utilities and service systems.

It is not known at this time the extent of potential excavation or other remedial activities. As such, there needs to be careful consideration to the phasing of remedial actions to ensure that basic services are maintained to the Carousel Tract and adjoining Monterey Pines development.

During the implementation of the approved remedial action, the ability to occupy the homes and maintain a semblance of normalcy may be greatly compromised. The potential for residents to move from their homes on a temporary or long term basis needs to be evaluated. Reduction in property values may also contribute to increased vacancy. The potential for a significant number of vacant or abandoned properties may create a blighted condition and increase the demand for law enforcement and fire services.

California Regional Water Quality Control Board
Los Angeles Region
October 8, 2013
Page 2

The remedial actions may necessitate a significant amount of plan review and inspection service associated with permits issued by the city, including but not limited to the Building and Safety Division, Engineering Division, and Public Works Division. Early coordination is recommended to determine the extent of inspection services that may be required. The CEQA document should evaluate the potential need to augment normal plan review and inspection services.

During pilot tests involving excavation, residents reported strong odors that were offensive to some. With the potential for a large amount of excavation to be conducted over an extended period of time, the CEQA document should provide a detailed analysis of potential odors and identify measures to minimize such impacts within the Carousel Tract and surrounding area.

City staff recommends that the CEQA document include a discussion of the health effects of air pollution (especially on sensitive receptors) due to grading and excavation, operation of equipment, mobile emissions and other activities associated with the remedial action. Such an evaluation should promote effective strategies for reducing exposure.

The City of Carson supports the efforts of the Regional Board to complete the CEQA process in a timely manner. We will extend the assistance of our staff to provide information and to answer questions as they may arise. If there are any questions, I may be reached at (310) 952-1773.

Sincerely,



Sheri Repp Loadsman
Planning Officer

cc: Mayor and City Council
Acting City Manager
Girardi & Keese
Integrated Resource Management, Inc.

Los Angeles Unified School District

Office of Environmental Health and Safety

JOHN E. DEASY, Ph.D.
Superintendent of Schools

ENRIQUE G. BOULL'T
Chief Operating Officer

JOHN STERRITT
Director, Environmental Health and Safety

April 18, 2014

Dr. Teklewold Ayalew
Los Angeles Water Board Project Manager
320 W. 4th Street
Suite 200, Los Angeles, CA 90013
teklewold.ayalew@waterboards.ca.gov.

Sent via Electronic Mail

SUBJECT: LAUSD COMMENTS ON THE NOTICE OF PREPARATION (NOP) FOR THE ENVIRONMENTAL IMPACT REPORT (EIR) FOR THE FORMER KAST PROPERTY TANK FARM SIT REMEDIATION PROJECT

Presented below are comments submitted on behalf of the Los Angeles Unified School District (LAUSD), Office of Environmental Health and Safety (OEHS), regarding the Notice of Preparation for an Environmental Impact Report (EIR) for the Former Kast Property Tank Farm Sit Remediation Project.

Overall, LAUSD is supportive of the Project, which will remediate existing and potential environmental impacts in an area approximate to LAUSD schools and the community it serves. We look forward to working with the project team and oversight agencies to ensure all measures are implemented to protect the health and safety of LAUSD students and their families, teachers, and staff.

Our comments are as follows:

1. Wilmington Middle School, located at 1700 Gulf Ave, Wilmington, CA 90744, is approximately 300' southwest of the Project Site. The school's northerly border abuts Lomita Boulevard, which is the southerly border of the Project Site. The school has approximately 2,181 students in grades 6-8.
2. The EIR should identify the Wilmington School site as an area of "sensitive receptors." The site houses children who would be more sensitive than the general population to exposures of any chemical or volatile elements. The EIR should address issues of air quality, dust, construction vehicle traffic, noise, water quality and the other significant impact areas identified in the NOP specifically to this site. In other words, LAUSD strongly recommends that analysis and findings for the significant resource areas include site specific analysis of impacts on Wilmington Middle School.

The two schools identified below are less proximate to the Project Site. However, depending on the range of potential environmental impacts, they should be identified and pertinent analysis performed regarding project impacts on students and staff.

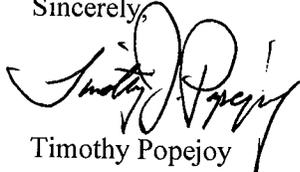
3. Broad Avenue Elementary School, located at 24815 Broad Ave, Wilmington, CA 90744, is approximately 1,200' east of the Project Site. The school has approximately 890 students in grades PK-5. The school should be identified as an area of "sensitive receptors."

4. Banning High School, located at 1527 Lakme Ave, Wilmington, CA 90744, is approximately 1,775' southeast of the Project Site. The school has approximately 3,200 students in grades 9-12. The school should be identified as an area of "sensitive receptors."

5. We also recommend that construction traffic plans and truck haul routes be integrated with District Safe School Plans for the above mentioned schools for the protection of student-pedestrians who are present during school pick-up and drop-off times on school days.

Thank you for the opportunity to comment on this important project. If you need additional information please contact Pat Schanen at (213)241-3921 or the undersigned at (213)241-3913.

Sincerely,

A handwritten signature in black ink, appearing to read "Timothy Popejoy". The signature is stylized with large, flowing loops and a prominent initial "T".

Timothy Popejoy
CEQA Project Manager
OEHS

NATIVE AMERICAN HERITAGE COMMISSION

1550 Harbor Boulevard, Suite 100
West Sacramento, CA 95691
(916) 373-3715
Fax (916) 373-5471
Web Site www.nahc.ca.gov
Ds_nahc@pacbell.net
e-mail: ds_nahc@pacbell.net



April 23, 2014

Ms. Paula Rasmussen, Assistant Executive Officer

Regional Water Quality Control Board, Region 4 (Los Angeles)

320 West 4th Street, Suite 200
Los Angeles, CA 90013

Sent by U.S. Mail

No. of Pages:

4

RE: SCH#2014031053; CEQA Notice of Preparation (NOP)n; draft
Environmental Impact Report (DEIR) for the **"Former KAST Property Tank
Farm Site Remediation Project;"** located on a 44-acre parcel in the
City of Carson; Los Angeles County, California

Dear Ms. Rasmussen

The Native American Heritage Commission (NAHC) has reviewed the
above-referenced environmental document.

The California Environmental Quality Act (CEQA) states that any project
which includes archeological resources, is a significant effect requiring the
preparation of an EIR (CEQA guidelines 15064.5(b).. To adequately comply with
this provision and mitigate project-related impacts on archaeological resources,
the Commission recommends the following actions be required:

Lead agencies should include in their mitigation plan provisions for the
identification and evaluation of accidentally discovered archeological resources,
pursuant to California Environmental Quality Act (CEQA) §15064.5(f). In areas
of identified archaeological sensitivity, a certified archaeologist and a culturally
affiliated Native American, with knowledge in cultural resources, should monitor
all ground-disturbing activities. Also, California Public Resources Code Section
21083.2 require documentation and analysis of archaeological items that meet
the standard in Section 15064.5 (a)(b)(f).

If there is federal jurisdiction of this project due to funding or regulatory
provisions; then the following may apply: the National Environmental Policy Act (NEPA
42 U.S.C 4321-43351) and Section 106 of the National Historic Preservation Act (16
U.S.C 470 *et seq.*) and 36 CFR Part 800.14(b) require consultation with culturally
affiliated Native American tribes to determine if the proposed project may have an
adverse impact on cultural resources

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QUALITY CONTROL BOARD
LOS ANGELES REGION

We suggest that this (additional archaeological activity) be coordinated with the NAHC, if possible. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. Any information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum, and not be made available for public disclosure pursuant to California Government Code Section 6254.10.

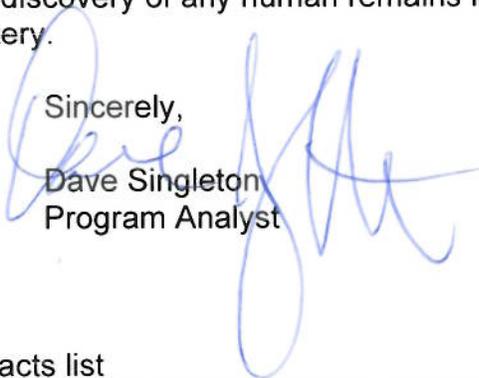
A list of appropriate Native American Contacts for consultation concerning the project site has been provided and is attached to this letter to determine if the proposed active might impinge on any cultural resources.

California Government Code Section 65040.12(e) defines "environmental justice" to provide "fair treatment of People... with respect to the development, adoption, implementation, and enforcement of environmental laws, regulations and policies." (The California Code is consistent with the Federal Executive Order 12898 regarding 'environmental justice.' Also, applicable to state agencies is Executive Order B-10-11 requires consultation with Native American tribes their elected officials and other representatives of tribal governments to provide meaningful input into the development of legislation, regulations, rules, and policies on matters that may affect tribal communities.

Lead agencies should consider first, avoidance for sacred and/or historical sites, pursuant to CEQA Guidelines 15370(a). Then if the project goes ahead then, lead agencies include in their mitigation and monitoring plan provisions for the analysis and disposition of recovered artifacts, pursuant to California Public Resources Code Section 21083.2 in consultation with culturally affiliated Native Americans.

Lead agencies should include provisions for discovery of Native American human remains in their mitigation plan. Health and Safety Code §7050.5, CEQA §15064.5(e), and Public Resources Code §5097.98 mandates the process to be followed in the event of an accidental discovery of any human remains in a location other than a dedicated cemetery.

Sincerely,


Dave Singleton
Program Analyst

CC: State Clearinghouse

Attachment: Native American Contacts list

**Native American Contacts
Los Angeles County California
April 23, 2014**

LA City/County Native American Indian Comm
Ron Andrade, Director
3175 West 6th St, Rm. 403
Los Angeles , CA 90020
randrade@css.lacounty.gov
(213) 351-5324
(213) 386-3995 FAX

Gabrielino Tongva Indians of California Tribal Council
Robert F. Dorame, Tribal Chair/Cultural Resources
P.O. Box 490
Bellflower , CA 90707
Gabrielino Tongva
gtongva@verizon.net
562-761-6417 - voice
562-761-6417- fax

Tongva Ancestral Territorial Tribal Nation
John Tommy Rosas, Tribal Admin.
Private Address
Gabrielino Tongva
tattnlaw@gmail.com
310-570-6567

Gabrielino-Tongva Tribe
Bernie Acuna, Co-Chairperson
P.O. Box 180
Bonsall , CA 92003
Gabrielino
(619) 294-6660-work
(310) 428-5690 - cell
(760) 636-0854- FAX
bacuna1@gabrielinotribe.org

Gabrieleno/Tongva San Gabriel Band of Mission
Anthony Morales, Chairperson
PO Box 693
San Gabriel , CA 91778
Gabrielino Tongva
GTTribalcouncil@aol.com
(626) 286-1232 - FAX
(626) 286-1758 - Home
(626) 286-1262 -FAX

Gabrielino-Tongva Tribe
Linda Candelaria, Co-Chairperson
P.O. Box 180
Bonsall , CA 92003
Gabrielino
palmsprings9@yahoo.com
626-676-1184- cell
(760) 636-0854 - FAX

Gabrielino /Tongva Nation
Sandonne Goad, Chairperson
P.O. Box 86908
Los Angeles , CA 90086
Gabrielino Tongva
sgoad@gabrielino-tongva.com
951-845-0443

Gabrieleno Band of Mission Indians
Andrew Salas, Chairperson
P.O. Box 393
Covina , CA 91723
Gabrielino
gabrielenoindians@yahoo.
(626) 926-4131

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of the statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is only applicable for contacting locative Americans with regard to cultural resources for the proposed SCH#2014031053; CEQA Notice of Preparation (NOP); draft Environmental Impact Report (DIEIR) for the Former KAST Property Tank Farm Remediation Project; located in the City of Carson; Los Angeles County, California

**Native American Contacts
Los Angeles County California
April 23, 2014**

Gabrielino-Tongva Tribe
Conrad Acuna,
P.O. Box 180 Gabrielino
Bonsall , CA 92003

760-636-0854 - FAX

Gabrielino /Tongva Nation
Sam Dunlap, Cultural Resources Director
P.O. Box 86908 Gabrielino Tongva
Los Angeles , CA 90086
samdunlap@earthlink.net
909-262-9351

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of the statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is only applicable for contacting locative Americans with regard to cultural resources for the proposed SCH#2014031053; CEQA Notice of Preparation (NOP); draft Environmental Impact Report (DIEIR) for the Former KAST Property Tank Farm Remediation Project; located in the City of Carson; Los Angeles County, California



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178

(909) 396-2000 • www.aqmd.gov



Dr. Teklewold Ayalew
Los Angeles Water Board Project Manager
320 W. 4th Street, Suite 200
Los Angeles, CA 90013

Notice of Preparation of a CEQA Document for the Former Kast Property Tank Farm Site Remediation Project

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. The SCAQMD staff's comments are recommendations regarding the analysis of potential air quality impacts from the proposed project that should be included in the draft CEQA document. Please send the SCAQMD a copy of the Draft EIR upon its completion. Note that copies of the Draft EIR that are submitted to the State Clearinghouse are not forwarded to the SCAQMD. Please forward a copy of the Draft EIR directly to SCAQMD at the address in our letterhead. **In addition, please send with the draft EIR all appendices or technical documents related to the air quality and greenhouse gas analyses and electronic versions of all air quality modeling and health risk assessment files. These include original emission calculation spreadsheets and modeling files (not Adobe PDF files). Without all files and supporting air quality documentation, the SCAQMD will be unable to complete its review of the air quality analysis in a timely manner. Any delays in providing all supporting air quality documentation will require additional time for review beyond the end of the comment period.**

Air Quality Analysis

The SCAQMD adopted its California Environmental Quality Act (CEQA) Air Quality Handbook in 1993 to assist other public agencies with the preparation of air quality analyses. The SCAQMD recommends that the Lead Agency use this Handbook as guidance when preparing its air quality analysis. Copies of the Handbook are available from the SCAQMD's Subscription Services Department by calling (909) 396-3720. More recent guidance developed since this Handbook was published is also available on SCAQMD's website here: www.aqmd.gov/ceqa/hdbk.html. SCAQMD staff also recommends that the lead agency use the CalEEMod land use emissions software. This software has recently been updated to incorporate up-to-date state and locally approved emission factors and methodologies for estimating pollutant emissions from typical land use development. CalEEMod is the only software model maintained by the California Air Pollution Control Officers Association (CAPCOA) and replaces the now outdated URBEMIS. This model is available free of charge at: www.caleemod.com.

The Lead Agency should identify any potential adverse air quality impacts that could occur from all phases of the project and all air pollutant sources related to the project. Air quality impacts from both construction (including demolition, if any) and operations should be calculated. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips). Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality impacts from indirect sources, that is, sources that generate or attract vehicular trips should be included in the analysis.

The SCAQMD has also developed both regional and localized significance thresholds. The SCAQMD staff requests that the lead agency quantify criteria pollutant emissions and compare the results to the recommended regional significance thresholds found here: <http://www.aqmd.gov/ceqa/handbook/signthres.pdf>. In addition to analyzing regional air quality impacts, the SCAQMD staff recommends calculating localized air quality impacts and comparing the results to localized significance thresholds (LSTs). LST's can be used in addition to the recommended regional significance thresholds as a second indication of air quality impacts when preparing a CEQA document. Therefore,

when preparing the air quality analysis for the proposed project, it is recommended that the lead agency perform a localized analysis by either using the LSTs developed by the SCAQMD or performing dispersion modeling as necessary. Guidance for performing a localized air quality analysis can be found at: <http://www.aqmd.gov/ceqa/handbook/LST/LST.html>.

In the event that the proposed project generates or attracts vehicular trips, especially heavy-duty diesel-fueled vehicles, it is recommended that the lead agency perform a mobile source health risk assessment. Guidance for performing a mobile source health risk assessment ("*Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis*") can be found at: http://www.aqmd.gov/ceqa/handbook/mobile_toxic/mobile_toxic.html. An analysis of all toxic air contaminant impacts due to the use of equipment potentially generating such air pollutants should also be included.

In addition, guidance on siting incompatible land uses (such as placing homes near freeways) can be found in the California Air Resources Board's *Air Quality and Land Use Handbook: A Community Perspective*, which can be found at the following internet address: <http://www.arb.ca.gov/ch/handbook.pdf>. CARB's Land Use Handbook is a general reference guide for evaluating and reducing air pollution impacts associated with new projects that go through the land use decision-making process.

Mitigation Measures

In the event that the project generates significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized during project construction and operation to minimize or eliminate these impacts. Pursuant to state CEQA Guidelines §15126.4 (a)(1)(D), any impacts resulting from mitigation measures must also be discussed. Several resources are available to assist the Lead Agency with identifying possible mitigation measures for the project, including:

- Chapter 11 of the SCAQMD *CEQA Air Quality Handbook*
- SCAQMD's CEQA web pages at: www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html
- CAPCOA's *Quantifying Greenhouse Gas Mitigation Measures* available here: <http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>.
- SCAQMD's Rule 403 – Fugitive Dust, and the Implementation Handbook for controlling construction-related emissions
- Other measures to reduce air quality impacts from land use projects can be found in the SCAQMD's Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning. This document can be found at the following internet address: <http://www.aqmd.gov/prdas/aqguide/aqguide.html>.

Data Sources

SCAQMD rules and relevant air quality reports and data are available by calling the SCAQMD's Public Information Center at (909) 396-2039. Much of the information available through the Public Information Center is also available via the SCAQMD's webpage (<http://www.aqmd.gov>).

The SCAQMD staff is available to work with the Lead Agency to ensure that project emissions are accurately evaluated and mitigated where feasible. If you have any questions regarding this letter, please contact me at imacmillan@aqmd.gov or call me at (909) 396-3244.

Sincerely,



Ian MacMillan

Program Supervisor, CEQA Inter-Governmental Review
Planning, Rule Development & Area Sources