



VENICE AUXILIARY PUMPING PLANT (VAPP)

(SCH #2015111038)

ADDENDUM TO THE ENVIRONMENTAL IMPACT REPORT
For the VAPP – 128 Hurricane St. Lot Oilwell Abandonment

v. October 29, 2021

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1.0 Introduction

Section 15160 of the CEQA Guidelines explains that there are a number of examples of variations in EIRs, because the documents are tailored to different situations and intended uses. The variations are not exclusive. Lead Agencies may use variations consistent with the guidelines to meet the needs of other circumstances. (State of California, 2020)

The CEQA process allows for an Addendum EIR when the lead agency finds and identifies information about additional impacts of a proposed project that was not included in the original Project EIR. Specifically, Section 15164 Addendum to an EIR of the CEQA Guidelines states (State of California, 2020):

- (a) The lead agency or responsible agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred.
- (b) An addendum to an adopted negative declaration may be prepared if only minor technical changes or additions are necessary or none of the conditions described in Section 15162 calling for the preparation of a subsequent EIR or negative declaration have occurred.
- (c) An addendum need not be circulated for public review but can be included in or attached to the final EIR or adopted negative declaration.
- (d) The decision-making body shall consider the addendum with the final EIR prior to making a decision on the project.
- (e) A brief explanation of the decision not to prepare a subsequent EIR pursuant to Section 15162 should be included in an addendum to an EIR, the lead agency's findings on the project, or elsewhere in the record. The explanation must be supported by substantial evidence.

Section 15162 of the CEQA Guidelines provides the criteria for preparing a Subsequent EIR or Negative Declaration. However, this project does not include substantial changes that involve any new significant environmental effects or a substantial increase in the severity of previously identified significant effects.

No substantial changes occur with respect to the circumstances under which the project is undertaken that will require major revisions of the previously approved EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.

There is new information of substantial importance, which was not known and could not have been known with reasonable diligence at the time the previous EIR was certified; however, there are no additional severe significant effects, new mitigation measures, or new available but not adopted Alternatives. Here, the City has opted to prepare an Addendum to assess the minor modifications of the Project that have transpired since preparation of the EIR (State of California, 2020).

The CEQA process allows for an Addendum EIR when the lead agency finds and identifies information about additional impacts of a proposed project that were not included in the original Project EIR. The lead agency can prepare a Draft Addendum EIR to add these new environmental impacts of the Proposed Project.

The addition of the VAPP Project's oil well abandonment and remediation of the 128 Hurricane St. lot; and the new designation of the adjacent Venice Grand Canal and Ballona Lagoon waters as a U.S. Essential Fisheries Habitat area were not analyzed or included in the VAPP EIR. The VAPP EIR did not address Hazards or Hazardous Materials.

Therefore, the City of Los Angeles has decided to prepare a Draft Addendum EIR. to the previously certified EIR because some changes or additions are necessary, but none are any of the conditions described in CEQA Section 15162 calling for preparation of a subsequent EIR have occurred. The Addendum of the EIR need not be circulated for public review but can be included in or attached to the Final EIR. The decision making body shall consider the addendum with the Final EIR prior to making a decision on the project. A brief explanation of the decision not to prepare a subsequent EIR pursuant to CEQA § 15162 should be included in an addendum to an EIR, the lead agency's findings on the project, or elsewhere in the record. Also, the explanation must be supported by substantial evidence. (State of California, 2016)

2.0 Project Overview

The purpose of this Addendum EIR is to update the VAPP DRAFT EIR and FINAL EIR with new and additional information about the project site that do not cause new significant impacts.

This addendum includes: the new designation of the Venice Grand Canal and Ballona Lagoon as an U. S. National Marine Fisheries Service (NMFS) Essential Fisheries Habitat; the 128 Hurricane St lot oil well abandonment, including soil removal and soil remediation (See *Figure 4 - 128 Hurricane St. Lot Site Plan* and *Figure 5 - VAPP Site Plan*).

Then the following 128 Hurricane St lot construction:

- Impervious area, including seven parking spaces and four bicycle spaces; and sidewalk, is approximately 3,031 square feet or 0.07 acres.
- Pervious area, including landscaped and open space area, is approximately 1,199 square feet or 0.03 acres.

Additionally, proposed improvements will include installation of a public art on the Site to comply with the City of LA Public Works Improvement Arts Program. The three-dimensional public art will be in the landscaped and open space on the south side of the Site. This area will be open to public access.

The Site will serve as the Laydown Area 1 for Stage 1 of the redevelopment. Access to the Site during construction will be from Hurricane Street.

3.0 Project Background

This Addendum to the previously certified Final Environmental Impact Report for the Venice Auxiliary Pumping Plant (State Clearinghouse #2015111038) has been prepared by the City of Los Angeles to evaluate the environmental effects of the new U.S. NOAA Essential Fish Habitat designation, the oil well abandonment, soil removal, soil remediation, and the construction of the 128 Hurricane St. lot of the Venice Auxiliary Pumping Plant Project.

The Proposed Project is located at 128 Hurricane St., Venice, CA 90292 (Proposed Project) as part of the Venice Auxiliary Pumping Plant (VAPP) Project. The 128 Hurricane St lot is one of three vacant lots that make up the VAPP Project. It is the westerly lot of the three.

The Site is approximately 4,230 square feet and is assigned to the Los Angeles County Assessor's Parcel Number 422-5010-016. The Site is bordered to the north and west by residences; to the east by the City of LA Department of Public Works Venice Pumping Plant, and to the south by a CA Coastal Access Trail and Ballona Lagoon Grand Canal *Figure 3-Project Location Map*. The site is currently a vacant pervious lot and was recently used for the storage of vehicles and other miscellaneous items during the various public construction projects (Ninyo & Moore, 2016)

3.1 Previous Environmental Document

The Draft EIR was circulated for review and comments from the public and other interested parties, agencies, and organizations for over 45 calendar days, beginning on October 27, 2016, and closing on December 15, 2016.

The Final Environmental Impact Report for the Venice Auxiliary Pumping Plant (hereinafter referenced as the VAPP Final EIR) was certified by the City of Los Angeles City Council on August 9, 2017. It evaluated the potential environmental impacts resulting from construction of the VAPP.

4.0 Purpose for Addendum

The purpose of this Addendum to the EIR is to add the new information and analysis contained in the new Essential Fish Habitat Assessment for the VAPP (Ninyo & Moore, 2016) (AECOM, 2019); the Phase II ESA, Phase II ESA amendment; and the Remediation Action Plan. The analysis contained in the VAPP EIR did not include the Phase II ESA, Phase II ESA amendment; the Remediation Action Plan; and the new U. S. National Marine Fisheries Service (NMFS) Essential Fish Habitat Assessment's designation.

This Addendum EIR includes additional information the following environmental impact areas:

- Biological Resources – Essential Fish Habitat Assessment
- Hazards and Hazardous Materials – Soil removal, soil remediation and transport, and oil well abandonment

It should be noted, however, that the additional required sections and analysis that were not in the approved VAPP EIR, per CEQA are included in this Addendum EIR.

The focus of this Addendum EIR is specifically for:

- The Phase II ESA + Amendment for a limited subsurface soil and groundwater sampling and analysis; the exact location and abandonment of the oil well
- The Remediation Action Plan for soil removal and remediation of the 128 Hurricane St. lot
- The new Essential Fish Habitat Assessment for the VAPP U. S. National Marine Fisheries Service waterway designation of the adjacent waters Grand Canal and Ballona Lagoon as US Fisheries areas.

5.0 Proposed Project Modifications

1. Designate the waterways adjacent to the Project Site a U. S. National Marine Fisheries Service Essential Fisheries Habitat;
2. Phase II ESA soil removal plan for the 128 Hurricane St. lot for lead and TPH-d-impacted soil where the concentrations exceed residential screening level;
3. Remediation Action Plan with soil removal and remediation plans for the 128 Hurricane St. lot for lead and TPH-d-impacted soil where the concentrations exceed residential screening level; this includes agency oversight;
4. Abandon oil production well based on current CalGEM requirements, using the new Remediation Action Plan (RAP) oil well abandonment plan

6.0 Environmental Impact Analysis

This addendum environmental impact analysis provides new evidence, as required in CEQA Section 15162(e) that supports the City's decision not to prepare a Subsequent EIR pursuant to CEQA Guidelines Section 15162.

6.1 Biological Resources

This section describes the affected environment and regulatory setting for the biological resources and jurisdictional areas of the Project Site and associated study area (see *Figure 2 – Study Area Map*). It also describes the potential impacts that would result from implementation of the Venice Auxiliary Pumping Plant Project, including the 128 Hurricane St. lot on these resources and where necessary, to reduce or avoid such impacts.

Environmental Setting

The environmental setting information and analysis in this section is summarized from the *Biological Resources and Habitat Assessment* and *Jurisdictional Delineation Report* (ICF, 2016) (Appendix F).

Within this section, the term “study area” refers to the Project Site plus an additional 500-foot buffer area surrounding the Project Site. Special-status species referred to in this section include those plants and wildlife species listed as threatened or endangered under federal or state endangered species acts (California Department of Fish and Wildlife [CDFW] 2015a),

plant species designated by the California Native Plant Society (CNPS) with a California Rare Plant Rank (CRPR) or other plants of local concern (CNPS 2015), and wildlife that is designated as a California Species of Special Concern, as defined by CDFW (CDFW 2015a).

The biological resources and jurisdictional delineation were conducted to provide recommendations for design and construction of the VAPP at the Project Site. Thus, the recommendations presented address biological resources and jurisdictional issues, including the newly designated essential fish habitat, and jurisdictional areas, including waters of the United States and California and wetlands.

Ballona Lagoon and the Grand Canal lie within the neighborhood of Venice in Los Angeles, California, and are muted tidal, nearshore estuarine waters connected to Marina del Rey near its terminus in Santa Monica Bay (*Figure 1 – Project Vicinity Map*). The community of Venice experiences a mean annual temperature of 63 degrees Fahrenheit (°F; 17.2 Celsius [°C]), with a mean annual precipitation of approximately 13 inches. (U.S. Climate Data, 2019). Elevations in the study area, where Ballona Lagoon, Grand Canal, and Hurricane Street approximately come together, ranges from just below sea level to 3-feet above sea level. Although surrounded by development, aquatic features and their margin in the study area are primarily preserved open space with minimal-impact infrastructure.

The Project is approximately 0.75 mile upstream (north-northwest) of the Marina del Rey Channel and is at Grand Canal, just beyond where Ballona Lagoon transitions into the canal (*Figure 3 – Project Location Map*). Tidal exchange into Ballona Lagoon and Grand Canal occurs through three tide gates that pass underneath Via Marina and link the lagoon and the canal to the Pacific Ocean via the Marina Del Rey Channel. According to an older document from the State of California's Natural Resources Agency that is available online, one of the three gates is maintained in the open position, and the average tidal regime is restricted, and ranges from approximately -2 feet to +2.5 feet National Geodetic Vertical Datum (State of California, 2007). Debris racks with an approximately 2-inch grid on the inside and outside of the gate facility protect it from debris, effectively preventing larger fish from passing through. All of the fresh water entering Ballona Lagoon and Grand Canal is urban run-off; these features have been isolated from Ballona Creek.

The debris racks that control tidal flow to the Project Site were inspected on March 7, 2019, and found to have considerable potential to limit the movement of fishes. On the Marina Channel (Pacific Ocean) side of the gate facility, the debris rack spans all three tide gates. Two of the gates are slide gates, and one is a flap gate. On the Ballona Lagoon side of the facility, only the flap gate is protected by a debris rack, and the two bays leading to the slide gates are unprotected, open culverts. When the facility was observed, on an outgoing tide, substantial flow was traveling out of the lagoon through the flap gate, and there was a drop at the interior debris rack between the water surface in the lagoon and that in the Marina Channel. In addition to the 2-inch grid, depending on gate operation, fish movement through this facility could also be limited by water velocities, water surface drops (or jump heights), and passage through the flap gate, if that is the gate primarily used.

South of the Project, Ballona Lagoon ranges in width between 95 and 275-feet, and is about 4,000-feet in length, and includes approximately 14.5 acres of open water habitat and approximately 1.5 acre of intertidal habitat (State of California, 2007). Grand Canal, at the Project and to the north, is a narrower channel that, due to its uniform width and banks, appears

artificially excavated. It links the Venice Canals with the Pacific Ocean via Ballona Lagoon, and then the Marina del Rey Channel. The lagoon and canal floors are composed of soft mud and varying amounts of sand and gravel (Jones, 2012). In the Ballona Lagoon-Grand Canal transition, the waterway substrate is characterized by sandy silts mixed with clay (State of California, 2007). The Grand Canal channel itself is 48 feet (14.6 meters) in width at its floor, and between 0 and 3.5 feet (1.7 meters) in depth (Jones, 2012).

The Ballona Lagoon ecosystem supports narrow bands of coastal strand and coastal salt marsh vegetation communities and intertidal and subtidal soft-bottom communities. Residential development with heavy nearby commercial activity is the predominant land use type adjacent to the Grand Canal and Ballona Lagoon. The wetlands and tidal ecosystem of Ballona Lagoon is a valuable stopover for migratory birds, and possesses potential rearing grounds for smaller fish.

Regulatory Setting

Another review of the various federal, state, regional, and local government regulatory requirements was conducted to identify regulations that provide protection to essential fish habitats and their biological resources. This section summarizes the various regulatory requirements that are relevant to the Proposed VAPP Project, including the 128 Hurricane St. lot.

Federal Laws

Endangered Species Act of 1973 (16 U.S.C. Sections 1531 to 1543)

The Endangered Species Act of 1973 (ESA) and subsequent amendments provide guidance for the conservation of federally listed species and the habitats upon which they depend.

Interagency Consultation and Biological Assessments (ESA Section 7)

ESA Section 7 provides a means for authorizing take of threatened or endangered species by federal agencies and applies to actions that are conducted, permitted, or funded by a federal agency. It requires federal agencies to consult with the U.S. Fish and Wildlife Service (USFWS) or National Marine Fisheries Service (NMFS), as appropriate, to ensure that actions they authorize, fund, or carry out are not likely to jeopardize the continued existence of threatened or endangered species or result in the destruction or adverse modification of critical habitat for these species. If a Proposed Project “may affect” a listed species or destroy or modify critical habitat, the lead agency is required to prepare a biological assessment evaluating the nature and severity of the potential effect.

Section 404 of the Clean Water Act of 1977 (33 U.S.C. Sections 1251 to 1376)

The Clean Water Act of 1977 (CWA) serves as the primary federal law protecting the quality of the nation’s surface waters, including wetlands. Under Section 404, the U.S. Army Corps of Engineers (USACE) and the U.S. Environmental Protection Agency (EPA) regulate the discharge of dredged and fill materials into the waters of the United States. These waters are

primarily defined as navigable waterways or water features (including wetlands) that have a significant nexus to navigable waters. Project sponsors must obtain authorization from USACE for all discharges of dredged or fill materials into waters of the United States before proceeding with a proposed activity. Individual Section 404 permits may only be issued for a least environmentally damaging practicable alternative. Compliance with CWA Section 404 requires compliance with several other environmental laws and regulations. The USACE cannot issue an individual permit or verify the use of a general permit until the requirements of National Environmental Policy Act of 1969 (NEPA), ESA, the Coastal Zone Management Act (CZMA) and the National Historic Preservation Act (NHPA) have been met. Additionally, no permit can be issued or verified until a water quality certification, or waiver of certification, has been issued pursuant to CWA Section 401.

State Laws

California Coastal Act (Public Resource Code Division 20, Section 30000 et seq.)

The California Coastal Act is the state's Coastal Zone Management Program, as referenced under the CZMA, above. The California Coastal Act defines the "coastal zone" of California as extending generally 1,000 feet (305 meters) inland from the coast and 3 miles (5 kilometers) seaward. In certain areas, the inland boundary can extend up to 5 miles (8 kilometers). The California Coastal Act requires a Coastal Development Permit (CDP) from either the Coastal Commission or the City Engineer, as a local permit issuing agency. For this project, the work within the Grand Canal will require a state CDP, while work outside of the canal will require both state and local CDPs.

Porter-Cologne Water Quality Control Act (California Water Code Division 7)

The Porter-Cologne Water Quality Control Act (Porter-Cologne) established nine Regional Water Quality Control Boards (RWQCBs). These boards oversee water quality on a day-to-day basis at the local and/or regional level, and prepare and update water quality control plans. The RWQCBs also issue Section 401 water quality certifications under the federal Clean Water Act. Porter-Cologne also grants ultimate authority to the State Water Resources Control Board (SWRCB) over state water rights and water quality policy.

Additional Biological Reports

Essential Fish Habitat Assessment

Essential fish habitat, also known as EFH, includes all types of aquatic habitat and, in practice, specifies where a certain fish species lives and reproduces. Congress established the EFH mandate in 1996 to improve the nation's main fisheries law—the Magnuson-Stevens Fishery Conservation and Management Act—highlighting the importance of healthy habitat for commercial and recreational fisheries.

Essential fish habitat covers federally managed fish and invertebrates, but it does not apply to strictly freshwater species. These areas provide the habitats that shelter and sustain marine fish. Depending on the fish species, EFH could include the deep sea, coral reefs, kelp forests,

bays, wetlands, and rivers that connect to the ocean. Essential fish habitat includes all types of aquatic habitat where fish spawn, breed, feed, or grow to maturity (NOAA Fisheries, 2019).

Ballona Lagoon and the Grand Canal has been newly considered an Essential Fish Habitat for *Pacific Coast Groundfish and Coastal Pelagic Species* (Appendix C).

The extent of EFH for these commercially important species is designated in the Pacific Coast Groundfish Fishery Management Plan (FMP) and the Coastal Pelagic Species FMP, and defined as follows:

1. The overall extent of Pacific Coast Groundfish EFH is identified as all waters and substrate within the following areas:
 - a. Depths less than or equal to 1,914 fathoms (3,500 meters) to MHHW or the upriver extent of saltwater intrusion, defined as upstream and landward to where ocean-derived salts measure less than 0.5 part per thousand during the period of average annual low flow.
 - b. Seamounts in depths greater than 3,500 meters as mapped in the EFH assessment GIS.

Areas designated as Habitat Areas of Particular Concern (HAPCs) not already identified by the above criteria.

2. The overall extent of Coastal Pelagic Species EFH is tied to sea surface water temperatures within the Economic Exclusion Zone (EEZ) of U.S. Waters. The east-west geographic boundary of EFH for each individual coastal pelagic finfish and market squid is defined to be all marine and estuarine waters from the shoreline along the coasts of California, Oregon, and Washington offshore to the limits of the EEZ, and above the thermocline where sea surface temperatures range between 50°F to 79°F (10°C to 26°C).

Potential EFH in the project study area is shown in *Figure 2 – Study Area Map*. The extent of the project study area was determined in part based on the linear distance over which in-water construction noise may propagate. Grand Canal and Ballona Lagoon are tidal, predominantly saline, and may be accessible to some life stages of species managed under the Pacific Coast Groundfish and Coastal Pelagic FMPs. The potential EFH in the project study area includes all areas below MHHW, and is characterized as having predominantly sandy and silty substrates, although in some areas hardened, manmade surfaces are present. Ballona Lagoon and Grand Canal do not have any substantial inputs from freshwater tributaries, except urban runoff during storms. Water in the system is predominantly marine in origin, which presumably maintains the salinity at an average level that is close to seawater.

During the site visit, there were abundant California horn snails (*Cerithidea californica*), diverse foraging shorebirds and ducks, and disturbances at the water surface likely to have been made by fishes, which may be indicators of productive benthic habitat in Ballona Lagoon and Grand Canal. We did not observe eelgrass or other submerged aquatic vegetation. These species may use the estuarine waters of the Action Area during at least one life stage; engaging in rearing, foraging, and growth in these tidal channels. Estuarine areas are also considered to be HAPCs, as identified in EFH for Pacific Coast Groundfish (Pacific Fishery Management Council, 2016).

Environmental Impacts

Methodology

Potential significant impacts associated with the Proposed Project were identified from the *Biological Resources and Habitat Assessment* and *Jurisdictional Delineation Report*, Appendix F. These reports presented findings, conclusions, and recommendations concerning development of the Project Site that were based on an analysis of the existing biological resources and jurisdictional areas contained within the study area and which could be affected by the Proposed Project during construction and operation. The VAPP Habitat Mitigation and Monitoring Plan (HMMP) was prepared in anticipation of permit requirements of the U.S. Army Corps of Engineers (USACE), Regional WaterQuality Control Board (RWQCB), and California Coastal Commission (CCC). Once permits have been issued, this HMMP will be updated in accordance with applicable permit conditions.

The biological resources and jurisdictional delineation were conducted to provide recommendations for design and construction of the VAPP at the Project Site. Thus, the recommendations are incorporated into project design and construction plans and specifications, and address biological resources and jurisdictional issues, including special-status plants and wildlife, threatened and endangered plants and wildlife, sensitive plant communities, essential fish habitat, non-listed special-status animals, nesting birds, raptor foraging, wildlife corridors, environmentally sensitive habitat areas, and jurisdictional areas, including waters of the United States and California and wetlands.

Direct impacts occur when sensitive biological resources are altered through project implementation, such as through vegetation removal, habitat modifications, and injury or death of wildlife species. Indirect impacts may occur from elevated levels of noise or lighting, changes in surface water hydrology, or increased erosion or sedimentation. These types of indirect impacts can affect vegetation communities or their potential use by sensitive wildlife species.

Checklist Questions:

The criteria used to determine the significance of an impact on biological resources are based on *L.A. CEQA Thresholds Guide*. A project would normally have a significant impact on biological resources if it could result in:

BIO-1 Would the project 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?

BIO-2 Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

BIO-3 Would the project 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?

Construction Impact Analysis

The analysis below describes the temporary and permanent short-term and long-term direct and indirect impacts on the newly designated essential fish habitat area as a result of the Proposed Project during construction.

- BIO-1 Would the project result in the loss of individuals, or the reduction of existing habitat, of a state or federal listed endangered, threatened, rare, protected, or candidate species, or a Species of Special Concern or federally listed critical habitat?
- BIO-2 Would the project result in the loss of individuals or the reduction of existing habitat of a locally designated species or a reduction in a locally designated natural habitat or plant community?
- BIO-3 Interference with habitat such that normal species behaviors are disturbed (e.g., from the introduction of noise, light) to a degree that may diminish the chances for long-term survival of a sensitive species.

The analyses below address additional potential impacts that could occur to biological resources and the newly designated essential fish habitat during construction related to the loss or reduction of critical habitat, federally designated natural habitat, and sensitive species.

Potential Effects to Essential Fish Habitat

The Proposed Project, with respect to potential effects to EFH, can be described in four phases: in-water cofferdam installation; dewatering and excavation in the cofferdam; installation of below-grade structures; and cofferdam removal and site restoration. The VAPP Habitat Mitigation and Monitoring Plan (HMMP) will address any direct or indirect impacts to biological resources in the Ballona Lagoon and the Grand Canal. The purpose of the VAPP HMMP is to outline the implementation, maintenance, monitoring and management of waters and habitats provided as mitigation to offset temporary construction impacts associated with the project. Construction activities in upland areas would not have appreciable effects on EFH because implementation of the SWPPP would protect EFH from contaminated runoff or siltation.

Cofferdam Installation

Installation of the cofferdam would produce the majority of the Project effects on EFH, although said effects are mostly minimal and temporary. Activities expected to affect EFH during the cofferdam installation are pile driving of soldier piles and sheet piles into the substrate, and dewatering of the area in the cofferdam. The footprint of the cofferdam contains 0.92 acre of tidal waters and 0.012 acre of tidal wetland. Pile driving would disturb the sediment in Grand Canal, increase turbidity; and produce underwater noise, temporarily affecting EFH outside of the cofferdam area. These effects are expected to occur for less than 1 week. This area is approximately 3.8 acres in size.

Increased turbidity from pile placement may temporarily impact fish foraging and reduce algal photosynthesis, but suspended particulates would settle soon after completion of the cofferdam. Water quality monitoring would be conducted during construction to maintain turbidity within parameters established by the Regional Water Quality Control Board (RWQCB) in their Section 401 Certification. Localized turbidity may temporarily deter fish from foraging in the project study area (*Figure 2 –Study Area Map*) until the cessation of cofferdam construction.

Piles for cofferdam construction would be installed using a vibratory driver or hydraulic push methods. Hydraulic push methods do not generate intense underwater noise, vibratory drivers produce less intense underwater noise than impact drivers, and noise from vibratory drivers are not expected to cause barotrauma to fish (CALTRANS, 2015). However, underwater noise from pile driving may still cause temporary hearing shifts or behavioral changes in fish. During vibratory pile driving, the areas of Grand Canal and Ballona Lagoon that are exposed to pile driving noise may be used by fish at a lower rate, or abandoned altogether as fish move away from the noise source. When considering underwater noise impacts, the areas affected are typically limited to the areas where the sound can propagate in a straight line from the source. Because there is a corner in the waterway where the Grand Canal meets Ballona Lagoon, underwater noise would not effectively propagate much south of the pile-driving location. In Grand Canal, a series of slight bends would limit noise propagation to the area extending approximately 1,600 feet (500 meters) to the north. Following the completion of pile-driving activity, fish are expected to resume use of the area affected by pile-driving noise emissions.

Minor hydrological changes to the constricted channel outside of the cofferdam are expected. With the width of the Grand Canal reduced by the cofferdam, flow velocity in the remaining channel width is likely to increase. Should the velocity increase enough, the eastern bank may experience cutting and erosion, causing sediment deposition into the canal. However, the tide gate at the mouth of Ballona Lagoon restricts tidal flows through the Action Area; and based on observations made during the site visit, Grand Canal and Ballona Lagoon typically do not flow fast enough to re-suspend sediments, even with some constriction of the channel. Upstream and downstream flows in the Canal would pass through the half of the waterway's width not obstructed by the cofferdam, and therefore still allow the movement of fish, transport of nutrients, and persistence of hydrological parameters, such as temperature, salinity, and tidal flows.

Dewatering and Excavation

Following completion of the cofferdam, any impounded water would be pumped out, and the substrate in the cofferdam excavated. During this process, any fish or invertebrates in the cofferdam area would likely be rescued. Water pumped from the cofferdam impoundment would most likely be discharged into the sanitary sewer system as permitted through an industrial waste permit from the City. If there are any discharges to surface waters, they would occur in accordance with the requirements of RWQCB permitting, and therefore would not adversely affect EFH.

Dewatering and excavation would cause benthic macroinvertebrate losses in the cofferdam (0.092 acre of tidal waters and 0.012 acre of tidal wetland), but because the area is very small in relation to the overall tidal waters of Grand Canal and Ballona Lagoon (approximately 30 acres), this loss would not significantly affect forage for Pacific Coast

Groundfish or Coastal Pelagic Species. Excavation into the EFH substrate would further cause macroinvertebrate mortality; however, these impacts, like those of the dewatering, would be temporary.

Installation of Below Grade Structures

Once the excavated pit is dewatered, concrete grout may be jetted into the soil at the bottom of the pit to reduce groundwater percolation and to create a stable surface capable of supporting the new diversion structures, if needed. The new diversion structure would then be installed, along with the 66-inch connector, and the new diversion structure would be tied into the existing CIS. Because these concrete structures would be buried under 18 feet or more of sediment, they would have no direct interaction with the waters of Grand Canal or Ballona Lagoon, and would not affect water quality or EFH.

Cofferdam Removal and Site Restoration

Prior to removal of the cofferdam, stockpiled material would be returned to the excavation. During the removal of the cofferdam, during which the piles are expected to be direct-pulled with a crane from upland areas and surface flows restored to the dewatered area, some resuspension of sediment and temporary increases in turbidity may occur. The magnitude of these effects is expected to be no greater than those discussed for cofferdam installation, and would be more limited in duration, because removal of the cofferdam would only take 1 or 2 days.

Following removal of the cofferdam, the benthic macroinvertebrate community prey base would recolonize and stabilize in the affected area. Although this prey base would take time to recolonize, the area is very small, and prey base in the remainder of Grand Canal and Ballona Lagoon would continue to support EFH. Because the completed diversion structure would not protrude above the grade of the canal, and would be deep enough to avoid any long-term change to the substrate, there is no permanent alteration of EFH associated with the Proposed Project.

Restoration of the project study area would be supported by revegetation and re-contouring the grade of the western bank. Therefore, the Proposed Project's minimal lasting effects would be ameliorated by natural and facilitated restoration.

The project would not result in the loss of individuals, or the reduction of existing habitat, of a state or federal listed endangered, threatened, rare, protected, or candidate species, or a Species of Special Concern or federally listed critical habitat. Also, the project would not result in the loss of individuals or the reduction of existing habitat of a locally designated species or a reduction in a locally designated natural habitat or plant community. There will be no interference with essential fish habitat such that normal species behaviors are disturbed from the introduction of temporary construction noise and vibration to a degree that may diminish the chances for long-term survival of a sensitive species. Therefore, with the implementation of previously approved mitigation measures, including the Project's Habitat Management and Mitigation Plan (HMMP), impacts associated with biological resources and to jurisdictional areas during construction would be **less than significant**.

Operational Impacts

There are no operational effects to estuarine waters or EFH expected. The new wastewater facility is a closed system that would be better suited to handle increased wastewater surges than the current system. Therefore, its installation represents the most responsible measure to prevent future wastewater discharges into Grand Canal and Ballona Lagoon. Therefore; **no impacts** associated with biological resources would occur during operation; no mitigation is required.

6.2 Hazards and Hazardous Materials

This section describes the applicable laws and regulations for hazards and hazardous materials, and assesses how the construction and operation of the 128 Hurricane St. lot (the Hurricane St. lot) would alter them.

This chapter describes the environmental and regulatory setting for hazards and hazardous materials and characterizes new findings for the oil well abandonment implementation within the 128 Hurricane St. lot. (see *Figure 4 – 128 Hurricane St. Lot Site Plan*)

A hazardous material is any substance that, because of its quantity, concentration, or physical or chemical properties, may pose a hazard to human health and the environment. Under *California Code of Regulations* (CCR) Title 22, the term “hazardous substance” refers to both hazardous materials and hazardous wastes. Both of these are classified according to four properties: (1) toxicity, (2) ignitability, (3) corrosiveness, and (4) reactivity (CCR Title 22, Chapter 11). A hazardous material is defined in CCR Title 22 as:

[a] substance or combination of substances which, because of its quantity, concentration, or physical, chemical or infectious characteristics, may either (1) cause, or significantly contribute to, an increase in mortality or an increase in serious irreversible, or incapacitating reversible, illness; or (2) pose a substantial present or potential hazard to human health or environment when improperly treated, stored, transported or disposed of or otherwise managed (CCR Title 22 Section 66260.10).

Hazardous materials in various forms can cause death, serious injury, long-lasting health effects, and damage to buildings, homes, and other property. Hazards to human health and the environment can occur during production, storage, transportation, use, or disposal of hazardous materials.

Hazardous materials information in this chapter is based in part on the *Preliminary Geologic Hazards Evaluation City of Los Angeles Los Angeles, California*, prepared by Ninyo & Moore in February of 2018.

Environmental Setting

The 128 Hurricane Street parcel is located on the alluvial plain of Ballona Creek, at the northwest edge of the Peninsular Ranges Geomorphic Province of California. The Hurricane St. lot has not been developed with structures from at least 1928. Surrounding the Hurricane Street. Lot, the area has been developed with various oil production facilities from at least 1938

through 1952, and with residential properties from at least 1963 onward. The adjacent, Venice Pumping Plant was constructed in 1963 (Ninyo & Moore, 2016)

The upper 2-feet of soil beneath the Hurricane St. lot appears to be fill material consisting of light brown silty and sand. Underlying the fill material, soil is predominantly brown to gray fine sand and silty sand from the surface to maximum depth explored, which was 20 feet below ground surface (bgs). A sandy clay layer was encountered in some borings, the variable depth between 3.5 and 4 feet bgs. Concrete debris was also encountered in some of the borings.

The Project Site is within the Santa Monica Sub-basin of the Coastal Plain of Los Angeles Groundwater Basin. Groundwater was encountered at approximately 5 feet bgs. Reportedly, groundwater is expected to flow toward the southwest, to the Pacific Ocean (McAlister GeoScience, 2016). The site lies to the west of the hydrologic barrier, the water is not considered potable.

A former oil production well on site is referred to as of the *McDonald 2* (API 03713842) well, according to the CalGEM/DOGGR well finder website. The exact location of the well was recently discerned on the northwest portion of the lot. It has a total depth of 5,860 feet bgs (*Figure 8 – Amended Proposed Excavation Area*). The *McDonald 2* oil well was reported abandoned in 1932. A permit to re-abandon the well was issued in 2002 and renewed annually from 2004 to 2008.

The Project Site is located in a designated methane zone and is within the Playa del Rey Oilfield. (City of Los Angeles, 2020) The nearby area has had oil pipelines, storage tanks and vaults. According to the CalGEM/DOGGR well finder website, numerous other historical oil production wells are also located within the Site vicinity.

Regulatory Setting

Hazardous materials are substances that have the potential to cause a health hazard or harm to the environment with improper management or disposal. Hazardous substances are typically toxic, corrosive, ignitable, explosive, or chemically reactive, and may occur at a given location naturally, as a result of recent industrial or construction activities, or from historical uses.

Federal, state, and local laws regulate the use and management of hazardous or potentially hazardous or explosive substances. Hazardous substances are defined in the Federal Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Section 101(14), and also in the California Code of Regulations (CCR), Title 22, Chapter 11, Article 2, Section 66261. Hazardous waste is the by-product of processes and/or activities that can pose a substantial or potential hazard to human health or the environment from improper management or disposal.

For this analysis, soil that is excavated from a site containing hazardous materials would be considered a hazardous waste if it exceeded specific CCR Title 22 criteria. Remediation (cleanup and safe removal/disposal) of hazardous wastes found at a site is required if excavation of these materials is performed; it may also be required if certain other activities are proposed. Even if soil or groundwater at a contaminated site does not have the characteristics

required to be defined as hazardous wastes, remediation of the site is subject to jurisdictional authority. Cleanup requirements are determined on a case-by-case basis by the agency taking lead jurisdiction.

Federal

Federal Toxic Substances Control Act (1976) and the Resource Conservation and Recovery Act of 1976

The Federal Toxic Substances Control Act (1976) and the Resource Conservation and Recovery Act of 1976 (RCRA) established a program administered by the U.S. Environmental Protection Agency (EPA) for the regulation of the generation, transportation, treatment, storage, and disposal of hazardous waste. Hazardous waste in California is regulated primarily under the authority of the RCRA (United States Code [USC] Title 42, Section 6901 et seq.). RCRA was amended in 1984 by the Hazardous and Solid Waste Act (HSWA), which affirmed and extended the "cradle to grave" system of regulating hazardous wastes. The use of certain techniques for the disposal of some hazardous wastes was specifically prohibited by HSWA.

Comprehensive Environmental Response, Compensation, and Liability Act

CERCLA, commonly known as Superfund, was enacted by Congress on December 11, 1980. This law provided broad federal authority to respond directly to releases or threatened releases of hazardous substances that may endanger public health or the environment. CERCLA established requirements concerning closed and abandoned hazardous waste sites, provided for liability of persons responsible for releases of hazardous waste at these sites, and established a trust fund to provide for cleanup when no responsible party could be identified. CERCLA also enabled the revision of the National Contingency Plan (NCP). The NCP provided the guidelines and procedures needed to respond to releases and threatened releases of hazardous substances, pollutants, or contaminants. The NCP also established the National Priorities List (NPL). CERCLA was amended by the Superfund Amendments and Reauthorization Act (SARA) on October 17, 1986.

The Emergency Planning and Community-Right-to-Know Act

The Emergency Planning and Community Right-to-Know Act (EPCRA) of 1986 was created to help communities plan for chemical emergencies and to respond to concerns regarding environmental and safety hazards resulting from the storage and handling of toxic chemicals. EPCRA requires the reporting of storage, use, and releases of hazardous substances to the federal, state, and local governments.

Department of Transportation Hazardous Materials Regulations (49 CFR 100–185)

U.S. Department of Transportation (DOT) Hazardous Materials Regulations cover all aspects of hazardous materials packaging, handling, and transportation such as Parts 107 (Hazardous Materials Program), 130 (Oil Spill Prevention and Response), 172 (Emergency Response),

173 (Packaging Requirements), 177 (Highway Transportation), 178 (Packaging Specifications), and 180 (Packaging Maintenance). Enforcement of these DOT regulations is shared by administrations under delegations from the Secretary of the DOT including the Federal Highway Administration that enforces all regulations pertaining to motor carriers.

State

California Environmental Protection Agency

The California Environmental Protection Agency (CalEPA) was created in 1991. It unified California's environmental authority in a single cabinet-level agency and brought the California Air Resources Board, State Water Resources Control Board (SWRCB), RWQCB, CalRecycle, Department of Toxic Substances Control (DTSC), Office of Environmental Health Hazard Assessment, and Department of Pesticide Regulation under one agency. These agencies were placed under the CalEPA "umbrella" for the protection of human health and the environment to ensure the coordinated deployment of state resources. Their mission is to restore, protect, and enhance the environment and ensure public health, environmental quality, and economic vitality.

Department of Toxic Substances Control

DTSC, a department of CalEPA, is the primary agency in California for regulating hazardous waste, cleaning up existing contamination, and finding ways to reduce the amount of hazardous waste produced in California. DTSC regulates hazardous waste primarily under the authority of the federal RCRA and the California Health and Safety Code (primarily Division 20, Chapters 6.5 through 10.6, and CCR Title 22, Division 4.5). Other laws that affect hazardous waste are specific to handling, storage, transportation, disposal, treatment, reduction, cleanup, and emergency planning. Title 22, Article 3 highlights the procedures of identifying hazardous waste into these 4 categories: ignitable, corrosive, reactive, and toxic. Article 5 categorizes hazardous waste into acutely hazardous waste, extremely hazardous waste, non-RCRA hazardous waste, RCRA hazardous waste, special waste, and universal waste. Title 22 of the CCR also underscores the guidelines for managing hazardous waste, which includes storing, housekeeping, record keeping, and inspecting waste (State of California, 2002)

The DTSC Environmental Health Standards for the Management of Hazardous Waste is included in CCR, Title 22, Division 4.5. All hazardous waste generators must comply with the guidelines, which are enforced by DTSC, for identifying, labeling, accumulating, preparing, and preventing outcomes related to hazardous waste.

Cortese List

Government Code 65962.5 requires CalEPA to develop a hazardous waste and substances site list (Cortese List), which includes: hazardous waste sites according to DTSC and the Health and Safety Code; contaminated public drinking water wells sites listed by the State Department of Health Services; Underground Storage Tank (UST) leaks, solid waste facilities, and hazardous waste sites listed by the SWRCB; and other sites as designated by various other state and local governments. Section 6592.5 requires that the Cortese list be at least annually updated. The Cortese List complies with the CEQA requirements in providing information about the location of hazardous materials release sites.

Porter-Cologne Water Quality Control Act

The Porter-Cologne Water Quality Control Act restricts disposal of wastes or any other activity that may degrade waters of the state. The Act requires cleanup of wastes that are below hazardous concentrations but could impact ground and surface water quality (Section 13002). The Act established nine Region and State Water Boards, which are primarily responsible for protecting water quality in California. The Regional Water Boards regulate discharges by issuing permits through NPDES for waste discharge requirements for non-point source discharges. Anyone discharging materials or proposing to discharge materials that could affect water quality must file a report of waste discharge, unless the discharge would be into a community sewer system (California Water Board, 2014).

California Hazardous Waste Control Law

The California Hazardous Waste Control Law (HWCL) is administered by the California Environmental Protection Agency (CAL/EPA) to regulate hazardous wastes. The HWCL lists 791 chemicals and about 300 common materials that may be hazardous.

The HWCL also:

- Establishes criteria for identifying, packaging and labeling hazardous wastes;
- Prescribes management controls;
- Establishes permit requirements for treatment, storage, disposal and transportation; and
- Identifies some wastes that cannot be disposed of in landfills.

Hazardous substances are defined by state and federal regulations to protect public health and the environment. Hazardous wastes are hazardous substances that no longer have a practical use. Hazardous materials have certain chemical, physical, or infectious properties that cause them to be considered hazardous. According to CCR, Title 22, Chapter 11, Article 3, substances having a characteristic of toxicity, ignitability, corrosivity, or reactivity are considered to be hazardous. Examples of hazardous wastes include material that has been abandoned, discarded, spilled, contaminated, or is being stored prior to proper disposal. (State of California, 2016)

Toxic substances may cause short-term or long-lasting health effects, ranging from temporary effects to permanent disability, or death. For example, toxic substances can cause eye or skin irritation, disorientation, headache, nausea, allergic reactions, acute poisoning, chronic illness, or other adverse health effects if human exposure exceeds certain levels (the level depends on the substance involved). Carcinogens (substances known to cause cancer) are a special class of toxic substance. Examples of toxic substances include most heavy metals, pesticides, and benzene (a carcinogenic component of gasoline). Ignitable substances are hazardous because of their flammable properties. Gasoline, hexane, and natural gas are examples of ignitable substances. Corrosive substances are chemically active and can damage other materials or cause severe burns upon contact. Examples of corrosive substances include strong acids and bases such as sulfuric (battery) acid or lye. Reactive substances may cause explosions or generate gases or fumes. Explosives, pressurized canisters, and pure sodium metal (reacts violently with water) are examples of reactive materials.

Other types of hazardous materials include radioactive and biohazardous materials. Radioactive materials and wastes contain radioisotopes, which are atoms with unstable nuclei that emit ionizing radiation to increase their stability. Radioactive waste mixed with chemical hazardous wastes is referred to as "mixed wastes." Biohazardous materials and wastes include anything derived from living organisms. They may be contaminated with disease-causing agents, such as bacteria or viruses.

Environmental Health Standards for the Management of Hazardous Waste (22 CCR Div. 4.5, Section 66001 et seq.)

These standards establish requirements for the management and disposal of hazardous waste in accordance with the provisions of the California Hazardous Waste Control Act and Federal RCRA.

Unified Hazardous Waste and Hazardous Materials Management Regulatory Program

Senate Bill 1082 (1993) established the Unified Hazardous Waste and Hazardous Materials Management Regulatory Program (Unified Program). The Unified Program consolidates, coordinates, and makes consistent the following hazardous materials and hazardous waste program elements:

- Hazardous Waste Generation, Including On-Site Treatment under Tiered Permitting – This program regulates businesses that generate any amount of a hazardous waste. Proper handling, recycling, treating, storing, and disposing of hazardous waste are key elements to this program. Tiered permitting regulates the onsite treatment of hazardous waste.
- Aboveground Petroleum Storage Tank (APST) Spill Prevention, Control, and Countermeasure Planning (SPCCP) – Facilities with a single tank or cumulative aboveground storage capacities of 1,320 gallons or greater of petroleum-based liquid product (gasoline, diesel, lubricants, etc.) must develop an SPCC plan. An SPCC plan must be prepared in accordance with the oil pollution prevention guidelines in 40 CFR 112. This plan must include procedures, methods, and equipment at the facility to prevent discharges of petroleum from reaching navigable waters. A Registered Professional Engineer must certify an SPCC plan, and a complete copy of the plan must be maintained on site.
- Underground Storage Tanks (USTs) – This program regulates the construction, operation, repair, and removal of UST systems used to store hazardous materials and/or waste.
- California Accidental Release Prevention Program (CalARP) – This program requires any business that handles more than threshold quantities of an extremely hazardous substance to develop a Risk Management Plan (RMP). The RMP is implemented by the business to prevent or mitigate releases of regulated substances that could have offsite consequences through hazard identification, planning, source reduction, maintenance, training, and engineering controls.
- Hazardous Material Release Response Plans and Inventories (Business Plans) – Hazardous Materials Business Plans HMBPs contain basic information on the location, type, quantity, and health risks of hazardous materials and/or waste. Each business must prepare

a HMBP if that business uses, handles, or stores a hazardous material and/or waste or an extremely hazardous material in quantities greater than or equal to the following:

- 55 gallons for a liquid,
- 500 pounds of a solid,
- 200 cubic feet for any compressed gas, and
- Threshold planning quantities of an extremely hazardous substance.

Uniform Fire Code Hazardous Materials Management Plans and Inventories

Hazardous Materials Management Plans/Hazardous Materials Inventory Statements HMMP/HMIS and the Business Plan provide vital facility chemical and emergency response information to regulators, first responders, and the public with respect to community-right-to-know laws and emergency response preparedness. A fire chief may also require submission of the HMMP/HMIS below the state Business Plan reporting threshold quantity amounts for building occupancy type and fire code permits.

A Certified Unified Program Agency (CUPA) is a county, city, or joint powers agency that is approved and designated by Cal-EPA to implement the Unified Program and responsible for all six program elements of the Unified Program within its jurisdiction. Los Angeles Fire Department is the CUPA for the City.

California Code of Regulations, Title 8—Industrial Relations

Occupational safety standards exist in federal and state laws to minimize worker safety risks from both physical and chemical hazards in the workplace.

The California Occupational Safety and Health Administration (Cal/OSHA) is the primary agency responsible for developing and enforcing standards for safe workplaces and work practices. They assume primary responsibility for worker safety in the handling and use of chemicals in the workplace, as delegated by the federal Occupational Safety and Health Act. Cal/OSHA standards are generally more stringent than federal regulations.

The employer is required to monitor worker exposure to listed hazardous substances and notify workers of exposure (State of California, 2016) The regulations specify requirements for employee training, availability of safety equipment, accident-prevention programs, and hazardous substance exposure warnings. These standards would apply to construction activities. [What about monitoring community member exposure?](#)

California Labor Code (Division 5, Parts 1, 6, 7, and 7.5)

The *California Labor Code* is a collection of regulations that include regulation of the workplace to ensure appropriate training on the use and handling of hazardous materials and operation of equipment and machines that use, store, transport, or dispose of hazardous materials. Division 5, Part 1, Chapter 2.5, ensures that employees who are in charge of handling hazardous materials are appropriately trained and informed with respect to the materials they handle.

Division 5, Part 7, ensures that employees who work with volatile flammable liquids are outfitted with appropriate safety gear and clothing.

Regional

SCAQMD Rule 1166, Volatile Organic Compound Emissions from Decontamination of Soil

Rule 1166 was adopted by the SCAQMD on August 5, 1988 and subsequently amended in 1995 and 2001. The rule sets requirements to control the emission of Volatile Organic Compounds (VOC) during the excavating, grading, handling, and/or treating of VOC-contaminated soil. Prior to these activities, an approved mitigation plan must be obtained from SCAQMD.

SCAQMD Rule 1403

The purpose of this rule is to specify work practice requirements to limit asbestos emissions from building demolition and renovation activities, including the removal and associated disturbance of asbestos-containing materials (ACM), such as underground utility pipes, which may be applicable in some instances on the Project site. The requirements for demolition and renovation activities include asbestos surveying, notification, ACM removal procedures and time schedules, ACM handling and clean-up procedures, and storage, disposal, and landfilling requirements for asbestos-containing waste materials (ACWM). All operators are required to maintain records, including waste shipment records, and are required to use appropriate warning labels, signs, and markings. Applicability of this rule, in whole or in part, is applicable to owners and operators of any demolition or renovation activity, and the associated disturbance of asbestos.

Local

City of Los Angeles

City of Los Angeles Fire Code

The Los Angeles City Fire Code prescribes laws for hazardous material storage and handling, and safeguarding of life and property from fire, explosion, panic, or other hazardous conditions may arise in the use of buildings, structures, or other premises. City of Los Angeles Municipal Code Chapter 5, Article 7, City of Los Angeles Fire Department Hazardous Materials Section. (City of Los Angeles, 2017)

The City of Los Angeles Fire Department Hazardous Materials Section is the administrative agent for the California Health and Safety Code, California Code of Regulations related to emergency planning and community right to know laws, and federal SARA Title III. There are three units within this department that process information related to hazardous materials. The Disclosure Unit is responsible for enforcing the disclosure law, which requires all establishments storing, producing, or utilizing hazardous substances to inventory on-site; this includes new businesses, as well as existing businesses. The Business Plan Unit ensures that businesses take the right measures to mitigate any dangers. The Risk Management and Prevention Program (RMPP) Unit is responsible for evaluating RMPP's that businesses have to submit. An

RMPP is intended to reduce risks associated with the handling of acutely hazardous materials and is required of businesses that handle 55 gallons, 500 pounds, or 200 cubic feet or more of such materials.

City of Los Angeles Fire Department Haz Mat Program

The City LAFD provides emergency response and guidance to hazardous materials incidents within the City. The City LAFD Haz Mat Program utilizes a unified approach with allied agencies (i.e. Los Angeles County Fire Department or County LAFD) and many stakeholders to provide preparedness, prevention, response, mitigation and resiliency to hazardous materials emergencies. The City LAFD is an all-hazards response organization, and the Haz Mat Program is designed to address the natural, technological, or purposeful response challenges, including chemical, biological, radiological, nuclear and explosive (CBRNE) threats to our community and national security.

In compliance with California state guidelines, each governmental agency designated by the State of California as a CUPA is authorized to apply statewide standards to each facility within its jurisdiction that treats hazardous waste on site or generates hazardous waste, USTs, or stores hazardous materials. In May of 2008, DTSC delegated corrective action oversight authority under Chapter 6.5 of Division 20 of California Health and Safety Code to implement corrective action under consent agreement at CUPA facilities within its jurisdiction. CUPA's are mandated by the State to establish a single billing statement process for the collection of the fees and surcharges associated with the practices of each of the regulated businesses. The City LAFD is concerned with public safety and the environment as it relates to the management of hazardous materials and hazardous waste.

City LAFD and the Police Department (LAPD) are first responders if a hazardous-materials or a hazardous-waste release incident is reported via 911. They work with many partnering and supportive agencies. A step by step notification, the *Hazardous Materials Incident Contingency Plan* protocol is published by the California Office of Emergency Services (OES). (State of California, 2020). The notification process begins with calling 911 whereby City LAFD is notified of all releases and includes other agency notifications, as necessary. Some of the key partnering and supportive agencies are described further below.

City Department of Public Works, Bureau of Sanitation (LASAN), Watershed Protection Division assists the City LAFD in ensuring that the quality of surface water and the watershed are protected during any hazardous materials incidents and response, including chemical and biological releases, such as biological waste from homeless occupancies.

Other partnering support comes from the County LAFD. In 1991, the responsibility for the Los Angeles County Hazardous Materials Control Program was transferred from the LA County Health Department to Deputy Health Officers at the County LAFD.¹ The County LAFD Deputy Health Officers assist the City 1 Guidelines of Director of Health Services and Forester and Fire Warden in Performance of Hazardous Materials Control Program Activities, February 17, 1998, as supplied by Deputy Fire Chief Fernando Florez, County LAFD, Health & Hazardous Materials Division, Emergency Operations Unit, July 12, 2019.

LAFD in matters regarding public health and hazardous materials and waste release per a 1997 Memorandum of Understanding (MOU) between the City LAFD and the County LAFD. Various

CUPA responsibilities are outlined in this MOU; the County LAFD is identified as a CUPA Partnering Agency, in the areas of site mitigation, criminal investigations, and emergency response. (Florez, 2019) In addition, the LA County Public Health Department continues to provide the City with expertise in other areas of public health such as communicable diseases, pathogens, vector and rodent control, severe biological and toxicological threats (e.g., anthrax, etc. (Florez F. , 2019)). The LA County Public Health Department has been “Health Officer” for the City since 1964. In addition, the County LAFD, Health and Hazardous Materials Division provides Tier 2 hazardous waste assessment and mitigation services. (County of Los Angeles Fire Department, 2008)

City of Los Angeles General Plan Safety Element

Goal 1

A city where potential injury, loss of life, property damage and disruption of the social and economic life of the city due to fire, water related hazard, seismic event, geologic conditions or release of hazardous materials disasters is minimized.

Policy 1.1.4

Health/environmental protection. Protect the public and workers from the release of hazardous materials and protect City water supplies and resources from contamination resulting from accidental release or intrusion resulting from a disaster event, including protection of the environment and public from potential health and safety hazards associated with program implementation. (City of Los Angeles, 2020)

City of Los Angeles Emergency Operations Organization and Hazard Mitigation Plan

The Department of Emergency Operations Organization (EEO) within the City is responsible for the City's emergency preparations (planning, training and mitigation), response and recovery operations. The EEO is comprised of all agencies of the City's government and centralizes command and information coordination to enable its unified chain-of-command to operate efficiently and effectively in managing the City's resources.

The 2018 Hazard Mitigation Plan (HMP) is prepared to lessen the vulnerability to disasters and to reduce risks from natural hazards. An HMP serves as a guide for decision makers as they commit City resources to minimize the effects of natural hazards. The HMP integrates with existing planning mechanisms such as building and zoning regulations, long-range planning mechanisms, and environmental planning. The planning process includes conducting a thorough hazard vulnerability analysis, creating community disaster mitigation priorities, and developing subsequent mitigation strategies and projects. (City of Los Angeles, 2020)

Los Angeles City Building Code

Division 71 of the Los Angeles Building Code sets forth regulations for the control of methane intrusion emanating from geologic formations. The methane seepage regulations specify site

testing requirements and methane mitigation standards for all new buildings and paved areas (i.e., 5,000 square feet of paved area within 15 feet of an exterior wall of a commercial, industrial, institutional, or residential building) within designated methane zones or methane buffer zones. (City of Los Angeles, 2020)

Additional Geotechnical Studies

Phase II ESA

In August 2018, a Phase II ESA (Appendix A) which included a limited subsurface soil and groundwater sampling and analysis was conducted. The Phase II ESA report concluded:

- A buried flat concrete structure was observed and a nearby magnetic peak during the geophysical survey. The magnetic peak is believed to be the location of the former oil production well. The concrete feature may require removal and additional investigation and sampling.
- Soil samples exhibited lead and total petroleum hydrocarbons (TPH; primarily weathered diesel and oil fractions). The results indicated that past on-site activities related to oil production may have impacted the Site.
 1. Lead concentrations ranged from 3.4 milligrams per kilogram (mg/kg) (SB-4-5) to 160 mg/kg (SO-2-5).
 2. TPH as diesel (TPH-d) concentrations ranged from 6.4 mg/kg (SO-7-5) to 4,600 mg/kg (SO-9-2.5) TPH as oil (TPH-o) concentrations ranged from 5.0 mg/kg (SO-8-5) to 8,200 mg/kg (SO-9-2.5).
- Multiple shallow soil samples (2 and 4 feet bgs) exceeded commercial and/or residential screening levels for TPH-d and TPH as gasoline (TPH-g).
- Shallow soil samples (2 and 5 feet bgs) in the western portion of the Site exhibited elevated levels of lead that exceeded the commercial screening level, but not the residential screening level.
- Groundwater was encountered between 4 and 6 feet bgs. Groundwater quality is poor and not suited for beneficial uses. All groundwater concentrations were below non-drinking water screening levels.
- Methane was not detected from shallow gas probes,
- Site is classified as a Level I Site Design Level.
- No venting is required for hardscaping, but a passive ventilation system would be required for all future building construction.

Phase II ESA Amendment

In May 2019, an Amendment to Phase II ESA (Appendix B) updated the range of soil that could be tested onsite (AECOM 2018). The City of LA recently proposed the current development plan after the Phase II ESA had been submitted. The Phase II ESA was

amended according to the City of LA's current development plan and was submitted to the City on April 30, 2020. The following recommendations have been amended:

- The extent of the soil excavation and removal was determined by the amount of soil that exceeds residential screening levels due to proposed use as a parking lot and open space area.
- Total soil to be removed is 260 cubic yards (350 tons) as shown in *Table 1 - Excavation Areas and Total Soil Removal*.
- Three areas of excavation were identified and are estimated to produce approximately 160 cubic yards (215 tons) of impacted soil.
- Contingency soil removal due to confirmation sampling in the field is proposed to be 100 cubic yards (135 tons).
- Incomplete records of proper abandonment of the former production well necessitates uncovering the well casing and conducting a leak test under CalGEM supervision.
- Depending on leak testing results, CalGEM could require a complete re-abandonment of the production well or allow development over the well casing.
- A passive ventilation system will not be required due to the Site being developed as a hardscape parking lot less than 5,000 square feet and landscaped open space.

Remediation Action Plan

CalGEM requires the re-abandonment of the oil well, since it is deemed a Recognized Environmental Condition (REC), at the Project Site (Ninyo & Moore, 2016) A Remediation Action Plan (RAP) (Appendix B), dated July 2020, implements a course of action for the 128 Hurricane St. lot to abandon the active oil well, excavate and remove the soil that is contaminated around the oil well, backfill the site with new soil, and then design the proposed parking lot and open space project with Methane Building Standards.

The RAP considers the remediation threshold of this Site to be at the residential screening level. There are five locations that exceed residential screening levels. Soil excavation and removal are the best-selected remedies for remediation of TPH and Title 22 metals contamination considering the size, nature, and level of contamination at the site.

The volume of impacted soil to be removed is estimated to be 160 cubic yards or 215 tons. The total of impacted soil plus contingency to be removed is 260 cubic yard or 350 tons. Total volume and weight of excavated soil is summarized on *Table 1 - Excavation Areas and Total Soil Removal*.

This RAP was submitted to the oversight agencies, including the County of Los Angeles Fire Department-Health Hazardous Materials Division (LACFD-HHMD), The City of LA Fire Department, the California Department of Toxic Substances Control (DTSC), the Los Angeles Regional Water Quality Control Board (LARWQCB), and possibly the California Geologic Energy Management Division (CalGEM), for their review and approval to excavate and dispose of shallow residual hydrocarbon-impacted soil, provide a status update on a former on-site oil production well, and to address the methane issues in the soil vadose zone.

Agencies Notification Records

There are no records on GeoTracker or Envirostar for the Site and therefore there is no specific oversight agencies assigned. The City communicated with relevant regulatory agencies regarding voluntary oversight and additional requirements for the soil removal workplan. The City of LA and LACFD declined voluntary oversight and did not state additional requirements. (State of California, 2020) (State of California, 2020)

The DTSC and LARWQCB require an application for voluntary oversight to be submitted with the RAP. The application is included in Appendix E. Both agencies will review the application to determine which agency will be the lead regulator.

The South Coast Air Quality Management District (SCAQMD) requires implementing Rules 1166 and 1466 for air monitoring during soil removal, which includes site-specific plans, notification prior to field work, and dust control measures. The City of LA Department of Building Safety (LADBS) will not require methane mitigation or permitting for the soil removal work plan.

Oil Well Abandonment

There is an on-site abandoned former oil production well, as shown in *Figure 3 - Project Location Map and Figure 5 - VAPP Site Plan*. According to the CalGEM/DOGGR well finder website, a historical oil production well is present on the site (McDonald 2, API 03713842). According to CalGEM, this historical oil production well has a total depth of 5,860 feet bgs. The well went dry and was abandoned in May 1932. The bottom of the hole was plugged at 2,018 feet bgs. Various cement plugs were placed in the hole from 1,996 to 1,929 feet and 729 to 675 feet bgs. All other spaces were filled with heavy mud. The hole had been cemented at deeper depths prior to this final abandonment.

Based on a review of documents, a permit to re-abandon the well was issued in 2002 and renewed annually from 2004 to 2008. CalGEM requires the re-abandonment of the oil well at the Project Site in the Playa Del Rey oil field. (State of California, 2020)

Soil Removal Work Plan

Soil removal and remediation was chosen as the best cleanup alternatives due to the shallow depth and small volume of the lead and TPH-d-impacted residual soil.

The volume of impacted soil to be removed is estimated to be 160 cubic yards or 215 tons. The total of impacted soil plus contingency to be removed is 260 cubic yard or 350 tons. (*Figure 8 - Amended Proposed Excavation Area*) Total volume and weight of excavated soil is summarized on *Table 1 - Excavation Areas and Total Soil Removal*.

Pre-field Activities

Prior to conducting excavation of impacted soils, the following tasks will be completed:

- Schedule site access for required field activities.
- All proposed excavation areas will be clearly marked with white paint as required by Underground Service Alert (USA)
 - USA will be contacted at least 48 hours in advance to identify the location of on-site utilities.

- The location of the utilities from the previous Phase II ESA geophysical survey will be marked.
- Health and Safety Plan (HASP) - update with site-specific plan requirements prior to field activities.
- Los Angeles County Department of Public Works Building Safety Department - obtain a temporary grading permit
- The State of California, Division of Occupational Safety and Health – notify for the Annual T-1 Trench Permit requirement for the excavation/trenching activities
- A Waste Management Plan will be made with the qualified subcontractor to store, transport, and dispose of the hazardous and non-hazardous waste off site.
- SCAQMD – notify for Rule 1166 and 1466 requirement of site-specific plans to be submitted prior to field work implementation

Health and Safety Plan

A Site-specific and Project-specific HASP will be updated to cover field staff health and safety associated with the RAP implementation activities. All field personnel are required to implement the procedures presented in the HASP while conducting on-site field work.

Site Clearing and Debris Removal

Buried concrete and wood debris in excavation areas EA-1 and EA-2 should be broken up and removed using a drill attachment on an excavator. Construction debris will be stockpiled separately. Any vegetation will be cleared as necessary.

Soil Remediation Work Plan

Excavation Methodology

Soil will be excavated using a blade attachment on an excavator to prevent mixing of soils during excavation. Soil will be stockpiled in an area outside of the excavation areas. Each excavation area will have its own soil stockpile. If odor or staining is encountered, the soil will be segregated. During excavation, a Photoionization Detector (PID) will be used to monitor the presence and level of organic vapors from the excavation area.

Each excavation area will be excavated to the proposed extent and depth as summarized in the following sections.

Soil Excavation Work Plan

Each excavation area will be excavated to the proposed extent and depth as summarized in the following sections.

Soil Excavation Activities including Estimate Quantities

There are three proposed Excavation Areas (EA). See *Figure 8 - Amended Proposed Excavation Area* for Excavation Area Site Map. The volume of impacted soil to be removed is in five locations and is estimated to be 160 cubic yards or 215 tons:

*Table 1
Excavation Areas and Total Soil Removal*

EA-1	60 cy/82 tons
EA-1-1	22 cy/30 tons
EA-2	15 cy/20 tons
EA-2-1	19 cy/25 tons
EA-3	43 cy/58 tons

The total of impacted soil plus contingency to be removed is 260 cubic yard or 350 tons. Total volume and weight of excavated soil is in *Table 1 - Excavation Areas and Total Soil Removal*.

Provided below is a rationale for each EA and a proposed extent of excavation. The locations of the proposed excavation areas and historical sample locations are shown on *Figure 8 - Amended Proposed Excavation Area* and *Figure 9 - Proposed Excavation Area and Confirmation Sampling Locations*.

Excavation Area-1 (EA-1)

EA-1 is centered around the location of the abandoned oil production well as shown in *Figures 8 - Amended Proposed Excavation Area*. Part of the excavation may include buried concrete and debris removal. The excavation area was chosen due to the borings exceeding residential screening levels for lead and TPH-d. Approximately 60 cubic yards of soil (82 tons) are estimated to be removed and stockpiled from EA-1.

- Boring SO-2 concentrations exceeded the California residential screening level for lead of 80 mg/kg;
- Borings SO-2 and SO-13 concentrations exceeded California residential screening level of 230 mg/kg for TPH-d.

The depth of the proposed excavation is estimated to be 3.5 feet bgs, The lateral extent of the excavation area was chosen as approximately 5 feet in all directions based on the nearest sampling location. The excavation was extended to the northwestern and southwestern parcel boundaries of the Site to ensure removal of impacted soil. One boring (SO-2) within EA-1 will require greater depth for excavation.

Excavation Sub-Area-1-1 (EA-1-1)

EA-1-1 is a sub-area of EA-1, centered around the location of the abandoned oil production well as shown in *Figure 8 - Amended Proposed Excavation Area*. Part of the excavation may include buried concrete and debris removal. The excavation area was chosen due to the borings exceeding residential screening levels for lead and TPH-d. Approximately 22-cubic yards of soil (30 tons) are estimated to be removed and stockpiled from EA-1-1.

- Boring SO-2 lead concentration of 160 mg/kg at 5 feet bgs exceeds California residential screening level of 80 mg/kg

EA-1-1 requires deeper excavation to 1 foot below the impacted soil sample for a total of 6 feet bgs. Excavation extends to the western site boundary and approximately 5 feet to the northwest, northeast, and southeast.

Excavation Area-2 (EA-2)

EA-2 is centered around soil boring SB-4 and extends to boring SO-4 to connect with EA-1 (*Figure 8 - Amended Proposed Excavation Area*). The excavation area was chosen due to the borings exceeding residential screening levels for lead and TPH-d. Approximately 15 cubic yards of soil (20 tons) are estimated to be removed and stockpiled from EA-2. Part of the excavation may include buried concrete and debris removal.

- Boring SB-4 concentrations exceeding California residential screening level of 230 mg/kg for TPH-d (with a concentration of 670 mg/kg at 3.5 feet bgs).
- Boring SO-4, between SO-1 and SB-4, has detectable concentrations of TPH-d.

EA-2 requires that the depth of the proposed excavation is estimated to be 3.5 feet bgs. The lateral extent was chosen to connect EA-1 and EA-2, because boring SO-4, between SO-1 and SB-4, has detectable concentrations of TPH-d. One boring (SB-4) within EA-2 will require greater depth and is mentioned in the following subsection for Excavation Sub-Area-2-1 (EA-2-1).

Excavation Sub-Area-2-1 (EA-2-1)

EA-2-1 is a Subarea of EA-2. The excavation area was chosen due to the borings exceeding residential screening levels for lead and TPH-d. Approximately 19 cubic yards of soil (25 tons) are estimated to be removed and stockpiled from EA-2-1.

- Boring SB-4's TPH-d concentration of 670 mg/kg at 3.5 feet bgs exceeds the California residential screening level of 230 mg/kg

EA-2-1 requires deeper excavation to 1 foot below the impacted soil sample for a depth of 4.5 feet bgs. The excavation extends 5 feet on either side of the boring.

Excavation Area-3 (EA-3)

EA-3 bounds the southwestern Site boundary and goes just beyond SO-11 to the northwest. The excavation area was chosen due to the borings exceeding residential screening levels for lead and TPH-d. Approximately 43 cubic yards of soil (58 tons) are estimated to be removed and stockpiled from EA-3.

- Boring SO-9 concentration exceeding the California residential lead screening level of 80 mg/kg and
- Borings SB-6, SO-8, SO-9, and SO-11 concentrations exceeding California residential screening level of 230 mg/kg for TPH-d (*Figure 5 - Amended Proposed Excavation Area*).

EA-3 lateral extent is approximately 5 to 10 feet based on the nearest boring. The depth of the proposed excavation is estimated to be 3.5 feet bgs

Excavation Area Confirmation Sampling

Forty-six primary soil confirmation samples will be collected, prior to backfilling, to show that no lead or TPH-d impacted soils remain within the newly excavated areas. Five duplicates will be sampled for a total of 51 soil confirmation samples.

Samples Locations and Depth by Areas

Provided below is a proposed confirmation sampling plan for each excavation area and shown on *Figure 9 - Proposed Excavation Area and Confirmation Sampling Locations*. DTSC recommends sampling on every sidewall and every 50 square feet at the bottom of the excavation.

EA-1

In EA-1, soil samples were collected from all four sidewalls at a depth of approximately 0.5 feet bgs and 13 excavation floor samples per 7-foot by 7-foot grid at a depth of 3.5 feet. The total number of confirmation samples for EA-1 is 18 samples.

EA-1-1

In EA-1-1, soil samples were collected from all four sidewalls at a depth of approximately 0.5 feet bgs and two excavation floor samples per 7-foot by 7-foot grid at a depth of 6 feet. The total number of confirmation samples for EA-1-1 is seven samples.

EA-2

In EA-2, soil samples were collected from all four sidewalls at a depth of approximately 0.5 feet bgs and three excavation floor samples per 7-foot by 7-foot grid at a depth of 3.5 feet. The total number of confirmation samples for EA-2 is eight samples.

EA-2-1

In EA-2-1, soil samples were collected from all four sidewalls at a depth of approximately 0.5 feet bgs and two excavation floor samples per 7-foot by 7-foot grid at a depth of 5 feet. The total number of confirmation samples for EA-2-1 is seven samples.

EA-3

In excavation area EA-3, soil samples were collected from all four sidewalls at a depth of approximately 0.5 feet bgs and six excavation floor samples per 7-foot by 7-foot grid at a depth of 3.5 feet. The total number of confirmation samples for EA-3 is 11 samples.

Soil Sample Sampling and Analysis

All soil samples will be collected in eight-ounce jars from the bucket of the excavator. Samples will be labeled, capped, and stored on ice and submitted to a California-certified laboratory. All samples will be analyzed for TPH-d by United States Environmental Protection Agency (EPA) Method 8015 (M) and total lead by EPA Method 6010B. The laboratory will hold all samples and analyze for Soluble Threshold Limit Concentration (STLC) if the total lead results exceed 10 times the STLC and for Toxicity Characteristic Leaching Procedure (TCLP) if the total lead results exceeds 20 times the STLC.

The excavated areas will be widened and/or deepened, if the soil confirmation sampling data results show elevated TPH-d and/or lead concentrations exceeding residential screening levels.

Contingency for Proposed Remedial Excavation

A contingency of 100-cubic yards (cy) requiring further excavation is included. This contingency would be approximately 100-cubic yards (135-tons) of additional soil for confirmation sampling and proposed remedial excavation areas. The volume of impacted soil to be removed is estimated to be 160-cubic yards or 215-tons. The total of impacted soil plus contingency to be removed is 260-cubic yard or 350-tons. Total volume and weight of excavated soil is summarized on *Table 1 - Excavation Areas and Total Soil Removal*.

Backfilling

Grading will consist of approved imported fill graded to previous levels according to LA County's temporary guidelines. There will be approximately up to 35 new, additional truck trips.

Soil Profiling and Disposal

All excavated soils will be stockpiled (each EA will have its own soil stockpile) and will be profiled by analyzing a composite sample prior to disposal. A composite waste sample will be analyzed for VOCs by EPA method 8260B, TPH-g, -d, and -o by modified EPA method 8015 (M), and Title 22 Metals by EPA method 6010. If a metal concentration exceeds 10 times the Total Threshold Limit Concentration (TTLC), STLC will be run on the sample. If metal concentrations exceed 20 times the TTLC, and/or STLC exceeds the TTLC, TCLP will be run on the sample. Soil will be segregated if it has an odor or stain.

Upon receiving soil profile analytical results for each stockpile, soil and construction debris will be loaded into trucks and transported and disposed of properly. Soil with acceptable concentrations will be classified and disposed as non-hazardous waste. Non-hazardous waste shall be transported by a licensed hauler to a permitted waste disposal facility. The hazardous waste shall be transported by a licensed hauler to a permitted hazardous waste disposal facility. Prior to leaving the Site, trucks will be inspected to ensure the load is properly covered and clean. A manifest or bill of lading will be prepared for each truck leaving the Site. Due to the small size of all the excavations and the vacancy of the lot, traffic control is not needed for this soil removal work plan.

Methane zone

The Site is in a designated methane zone and is within the Playa del Rey Oilfield. The nearby area has had oil pipelines, storage tanks and vaults. According to the CalGEM/DOGGR well finder website, numerous other historical oil production wells are located in the Hurricane St. lot

vicinity. (State of California, 2020). The project is subject to City of Los Angeles Department of Building and Safety Methane Ordinance. (City of Los Angeles, 2010-2020) Only Methane Building Standards are necessary for the development of the parking lot and landscaping due to the size of the lot (less than 5,000 square feet) and the non-detects of methane in soil vapor probe samples.

Sites with Hazardous Materials Identified in Environmental Databases

There are no records on GeoTracker or Envirostar for the 128 Hurricane St. lot and therefore there is no specific oversight agencies assigned. According to the CalGEM/DOGGR well finder website, the McDonald 2 well, API 03713842, the former oil production well on site, as shown on *Figure 8 – Amended Proposed Excavation Area*.

The McDonald 2 well has a total depth of 5,860 feet below ground surface (bgs) and was abandoned in 1932. A permit to re-abandon the well was issued in 2002 and renewed annually from 2004 to 2008. According to CalGEM/DOGGR, the well has not been re-abandoned, and the permit to re-abandon was cancelled. CalGEM requires the re-abandonment of the oil well, since it, is deemed a Recognized Environmental Condition (REC).

The 128 Hurricane St lot has not been developed with structures from at least 1928, up through the time of this report. The area surrounding the site was developed with oil production facilities from at least 1938 through 1952, and with residential properties from at least 1963 through the time of this report. The Venice Pumping Plant appeared east of the 128 Hurricane St. lot from at least 1963. (Ninyo & Moore, 2016)

Proximity to Schools and Childcare Facilities

The project is located .4 miles south of the closest school Anchorage Street School located on Pacific Ave. The Proposed Project is not within one-quarter mile of an existing or proposed school. Therefore, the project will have no impact to hazards pertaining to the proximity to schools and childcare facilities.

Proximity to Airports and Airstrips

The project is located 7 miles northwest of the Los Angeles International Airport. The project is not located within an airport land use plan or where such a plan has not been adopted, is not within the vicinity of a private airstrip, is not within two miles of a public airport or public use airport, and the project will not result in a safety hazard for people residing or working in the project area. Therefore, the project will have no impact to hazards pertaining to airports or private airstrips.

Emergency Response Plan

The City LAFD is responsible for emergency medical services and fire protection in Los Angeles. In the event of an emergency, the City LAFD along with other City agencies would implement all appropriate emergency procedures outlined in the Hazard Mitigation Plan (City of Los Angeles, 2020) The plan was implemented to reduce risks from disasters to the people, property, economy, and environment within the City.

Wildfire

There are no designated, potential wildfire areas near the Proposed Project site. Therefore, the Proposed Project will not expose people or structures to a significant risk of loss, injury or death involving wildland fires. Therefore, the project will have no impact to wildfire.

Environmental Impacts

Methodology

This section evaluates the potential hazards and hazardous materials impacts that would result from the implementation of the Proposed Project. The hazards and hazardous materials analysis is based on the review of additional technical reports and federal, state, and local agency documents including the City of Los Angeles General Plan Safety Element and the United States Geological Survey and State Department of Conservation seismic hazard zone and hazards reports and maps. (State of California, 2020) (City of Los Angeles, 2020)

Checklist Questions

The *L.A. CEQA Thresholds Guide* (2006) states that, the determination of significance of impacts with respect to hazards (risk of upset/emergency preparedness), health hazards, or hazardous materials, shall be made on a case-by-case basis, considering several factors as follows: In accordance with Appendix G of the CEQA Guidelines, the Proposed Project would have a significant effect on hazards and hazardous materials if it would:

- HAZ-1: Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?
- HAZ-2: 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?
- HAZ-3: 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?
- HAZ-4: Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

The analyses below address additional potential impacts that could occur due to hazards and hazardous materials and the oil well abandonment during construction and operation.

Construction Impact Analysis

The construction impacts discussion below identifies and considers applicable regulations for the Proposed Project, thereby taking into account the regulatory framework factor in the analysis where appropriate.

- HAZ-1: Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

HAZ-2: 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?

There will be a **less than significant construction impact** and **no impact during operations**.

Oil Well Abandonment

The scope consists the following:

1. Pre-field activities and preparation of site-specific HASP.
2. Obtain permit from CalGEM.
3. Excavate around the well and make it safe for the welder and backhoe to install the wellhead to the casing and install the cellar ring around the well.
4. Install wellhead and cellar ring.
5. Mobilize the rig and all drilling equipment.
6. Remedial Action Plan Including Soil Removal Workplan 128 Hurricane Street, Venice, California
7. Prepared for: City of Los Angeles Bureau of Engineering AECOM 11
8. Install blowout preventer equipment approved by CalGEM.
9. Drill out old cement and cleanout the well to a total re-abandon depth.
10. Cement and perforating well per CalGEM Permit to surface.
11. Demobilize rig and equipment.
12. Remove cellar ring, cut casing to a final depth.
13. Gas test install I.D. plate and backfill with compaction wheel.
14. Schedule all required CalGEM inspections.
15. Dispose of waste generated from wells re-abandonment.
16. Complete reporting.

It takes approximately **four to six months** to perform re-abandonment of an oil production well depending on CalGEM inspections and approval.

Routine Transport, Disposal, and Handling of Hazardous Materials

The Project construction activities would involve the transport, and disposal of hazardous materials that include contaminated soil and debris from an abandoned oil well that are typically used in oil well abandonment remediation projects.

The total of impacted soil plus contingency to be removed is 260 cubic yard or 350 tons. The haul trucks will be no larger than

Soil and construction debris will be loaded into trucks and transported and disposed of properly. Soil with acceptable concentrations will be classified and disposed as non-hazardous waste. Non-hazardous waste shall be transported by a licensed hauler to a permitted waste disposal facility.

The hazardous waste shall be transported by a licensed hauler to a permitted hazardous waste disposal facility. Prior to leaving the Site, trucks will be inspected to ensure the load is properly covered and clean. A manifest or bill of lading will be prepared for each truck leaving the Site.

Due to the small size of all the excavations and the vacancy of the lot, traffic control is not needed for this soil removal work plan.

Buried concrete and wood debris in excavation areas EA-1 and EA-2 will be broken up and removed using a drill attachment on an excavator. Construction debris will be stockpiled separately. Any vegetation will be cleared as necessary.

Such transport and disposal would be compliant with applicable regulations such as those under RCRA, OSHA, DOT, California Labor Code, and the CCR. Moreover, the hazardous materials in the soil and debris are in small amounts, and any spills that may occur would be contained and cleaned according to the Materials Safety Data Sheet in the appropriate manner. The City LAFD is the designated enforcement agency for the City that regulates hazardous materials identified by U.S. EPA and CalEPA. Any potential construction-related hazardous releases would be from contaminated soil and oil and would not include substances listed in 40 CFR 355 Appendix A: Extremely Hazardous Substances and Their Threshold Planning Quantities. Any such releases would be small and localized. Any spills that may occur would be contained and cleaned according to the Materials Safety Data Sheet (MSDS)/Globally Harmonized System (GHS) in the appropriate manner.

Other Releases of Hazardous Materials

During excavation related to the soil removal, soil remediation and oil well abandonment construction under the Project, contaminated soil may be encountered, which may involve a release of hazardous materials into the environment. There is a possibility that contingency soil amounts of up to 100 cubic yards could also be excavated and analyzed for contamination on site. The probability of encountering contamination during construction work is very low based on the prior soil sampling.

Groundwater was encountered at the site at approximately 5 feet bgs. EA-1-1 requires deeper excavation to 1 foot below the impacted soil sample for a total of 6 feet bgs. Excavation extends to the western site boundary and approximately 5 feet to the northwest, northeast, and southeast. If groundwater is encountered, its risk to the environment, including sensitive receptors, would be evaluated and applicable law and regulations would be implemented as required. Handling of hazardous materials and hazardous waste, in the City, for the Project, would follow all applicable federal, state and local regulations.

Specifically, if ground water is encountered as part of deep excavation and construction, then dewatering procedures and permit requirements of the National Pollutant Discharge Elimination System (NPDES) would be applicable. Discharges of treated or untreated groundwater generated from dewatering operations or other applicable wastewater discharges not specifically covered in other general or individual NPDES permits are currently regulated under a regional general permit, General Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties.

Furthermore, in the event of storm water discharges during construction, it would be covered under Phase 1 Los Angeles County Municipal Stormwater NPDES Permit (MS4 Permit) for the City. Section 402 of the CWA establishes the NPDES permit, which is applicable to all discharges to waters of the United States, including stormwater associated with construction activities, industrial operations, municipal drainage systems, and point sources, to protect surface water quality. Under the current Phase 1 MS4 permit for Los Angeles County (Order No. R4-2012-175), MS4 Permit (State of California, 2012). MS4 permits require that cities and counties develop and implement programs and measures, including BMPs, control techniques, system design and engineering methods, and other measures, as appropriate, to reduce the discharge of pollutants in stormwater to the maximum extent practicable (MEP) and achieve water quality standards. The MS4 permit also includes construction requirements for implementation of minimum construction site BMPs, for erosion, sediment, non-stormwater management, and waste management on all construction sites that are less than 1 acre.

Contaminated soils are considered hazardous waste under the California Health and Safety Code. Therefore, BOE Standard Specifications Section 02310, Subsection 3.3, Contaminated Soil would be implemented for routine construction activities. This includes, and is not limited to, a site-specific Health and Safety Plan, OSHA Trainings, and soils testing per the SCAQMD Rule 1166 permit, and required procedures in the CCR, Title 22.

Actions and procedures for handling unknown substances as those required in CCR Title 8, Section 5192, Subsection G, enforced by the California Department of Industrial Relations specifies mandatory regulations to assist employees and employers in certain grave circumstances for the training and use of Level A and Level B of Personal Protective Equipment and gear for worker safety would be applicable.

The type and extent of the contamination will dictate the appropriate response and remediation appropriate for the site and the agencies to be notified. When the presence of VOCs from contaminated soil is suspected, which would generally be detected initially by strong odor per SCAQMD Rule 1166 for petroleum hydrocarbons, SCAQMD would be notified. Under Rule 1166 samples would be taken to measure the level of contamination in the soil before identifying the site as contaminated. If the VOC levels exceed 50 parts per million (ppm), a site mitigation plan, pursuant to Rule 1166, would be prepared, which may include use of soil vapor suppressants, covers over and below the soil, containerization, or removal of the contaminated material. Offsite disposal of hydrocarbon contaminated waste would be pursuant under EPA's Title 40, Environment and Title 49 Transportation Code of Federal Regulation Section 172.704 as enforced by the DOT.

Applicable Existing Law and Hazardous Material Releases

To further support the no impact determination for the Project, potential scenarios are outlined below. These scenarios demonstrate that adequate local response and regulations, understandings and practices are in place to avoid significant impact should a hazardous materials or hazardous waste release potentially occur or be discovered during the continuation of construction activities from the Project.

Scenario A: Immediate Threat to Public Safety and/or Public Health and the Environment

– Generally, the City LAFD CUPA Section investigates spills of hazardous materials and enforces the cases through either an administrative penalty or through the Office of the City Attorney Environmental Justice Unit. The City LAFD and LAPD are first responders to any hazardous materials or hazardous waste releases that qualify as an immediate threat to public safety or the environment. As stated above, such a scenario that would constitute an immediate threat to public safety or the environment is not anticipated and would be rare, since applicable law and standard design features would address construction-related releases, and any construction-related releases are expected to be small and localized.

Regardless, State law requires spills of hazardous materials from construction-related activities as stated above to be reported to the City LAFD, CUPA, and OES. These first responders are trained to ensure public safety and the proper management of hazardous materials, hazardous waste, and emergency response within the City. In addition, the City's LASAN is an assisting agency, if there is an imminent threat to the watershed or surface water quality from sidewalks that might drain to street, from curb-side to curb side and storm drain runoff ways. Depending on the type of release, partnering responders may also include the County LAFD, U.S. Coast Guard, State Office of Emergency Services, National Response Center, Highway Patrol, etc.). The Deputy Health Officers of the County LAFD, Health and Hazardous Materials Division respond to incidents within the City and support the City LAFD, as a partnering CUPA agency, to fully evaluate imminent threats to public health, including those originating from biological and chemical releases, such as hazardous materials spills, release and abandonment. The notification protocol is detailed in Appendix E1, with a summary of associated scenarios, regulations, and participating response agencies.

Scenario B: Non-Immediate Threat and No Equipment Involved - This scenario can result in several different outcomes. The release case can be referred from the City LAFD, as CUPA lead, to any of the below agencies or directly reported to the below agencies from the responsible party.

- County LAFD, Health and Hazardous Materials Division, Site Mitigation Unit – A regulated business owner, public party or private party that would be responsible for release and/or cleanup, could request assistance. They are typically low to medium risk release, and the agreement for oversight of cleanup is voluntary and reimbursed to the County LAFD. In addition, the County LAFD is tasked with assessment and enforcement for Tier 2 hazardous waste facilities. Tier 2 infers Conditional Authorization for onsite treatment of most hazardous waste streams with only one hazardous characteristic and quantities.
- Los Angeles County Department of Public Health – Assists with pathogenic public health risks, communicable diseases, and/or terrorist public health risks such as anthrax

threats, etc. Other related long-term public health inspection and control programs are also operated by the County within the City.

- LARWQCB, Site Cleanup Unit – If no equipment leaks are associated with the release or the source is unknown under this scenario and there is a perceived threat to surface water or groundwater quality, the case may be referred to this unit of the LARWQCB for cleanup oversight.
- DTSC and U.S. EPA – See Scenario B.

Conclusion

The release, routine transport and disposal of hazardous materials from construction activities from the Project would involve small amounts and be addressed through applicable law. Releases from existing groundwater and soil contamination is not expected, but would be addressed through standard City BOE conditions and applicable law that address the proper handling and disposal of contaminated material. As a result, the Project would not create a significant hazard through the routine transport, use, or disposal of hazardous materials; therefore, there is a **less than significant impact, no further mitigation is required.**

Therefore, the project does not add any impacts.

HAZ-3: *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?*

There will be no impact.

According to the CalGEM/DOGGR well finder website, the *McDonald 2* well, API 03713842, the former oil production well on site, as shown on *Figure 8 - Amended Proposed Excavation Area*, is deemed a Recognized Environmental Condition (REC) (Ninyo & Moore, 2016) CalGEM requires the re-abandonment of the oil well.

The *McDonald 2* well has a total depth of 5,860 feet below ground surface (bgs) and was abandoned in 1932. A permit to re-abandon the well was issued in 2002 and renewed annually from 2004 to 2008. According to CalGEM/DOGGR, the well has not been re-abandoned, and the permit to re-abandon was cancelled.

This project will re-abandon the oil well, which includes the removal and remediation of the lead and TPH-d-impacted residual soil. All necessary Project design Standards and Specifications will be incorporated into project's construction drawings.

The volume of impacted soil to be removed is estimated to be approximately 160-cubic yards or 215 tons. The total of impacted soil plus contingency to be removed is approximately 260-cubic yards or 350 tons. The Project construction would add up to 35 more truck trips over an approximately six-month period. Mitigation measures that have been previously approved in the Draft EIR apply to these additional haul trips. This increase will not introduce any new transportation impacts. Total volume and weight of excavated soil is summarized on *Table 1 - Excavation Areas and Total Soil Removal*.

Conclusion

The Project would not create a significant hazard to the public or the environment because the oil well will be abandoned, and the contaminated soil will be removed and remediated, then replaced with new soil. The site will no longer be a REC.

Releases from existing groundwater and soil contamination is not expected, but would be addressed through standard City BOE conditions and applicable laws that address the proper handling and disposal of contaminated material. Also, the Project's additional haul truck trips, with the use and implementation of the previously approved Draft EIR Mitigation Measures, will not create new transportation impacts. As a result, the Project would not create a significant hazard through the routine transport, use, or disposal of hazardous materials; therefore there is **no impact**.

HAZ-4: Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

There will be no impact.

Project construction activity could occur near emergency service facilities (e.g., fire stations and hospital) and along roadways used by emergency service providers. Per standard procedures, adequate emergency access would be maintained during lane closures along secondary highways and collector streets. Where feasible, for construction staging, traffic control would be employed to reroute pedestrians around the sidewalk construction area and signage would be posted to direct pedestrians and drivers. Construction managers and personnel would follow Work Area Traffic Control Handbook (WATCH) and/or Manual on Uniform Traffic Control Devices (MUTCD) guidelines to ensure the safety of vehicle, pedestrian, and bicycle traffic during re-routing. Compliance with such existing standard industry practices such as traffic control and signage, and requirements such as with those in the WATCH manual and "most recent of edition of the SSPWC Greenbook adopted by the Bureau of Engineering" would provide adequate emergency access. Access roads would be available for emergency personnel as required in the most recent copy of the BOE Brownbook; and traffic control, signage, and coordination with Los Angeles Department of Transportation (as appropriate) would occur. (City of Los Angeles, 2012)

Furthermore, in the unforeseen event of any hazardous material emergencies, the California Hazardous Material Incident Contingency Plan (HMICP), developed by the State's Office of Emergency Services (OES), includes several different scenarios of emergency responses to reduce confusion, improve safety, organize and coordinate actions in case of major unforeseen circumstances. The HMICP would be utilized by local governments to clarify agency roles and relationships concerning hazardous material emergencies.

Conclusion

As a result, the Project would not hinder or impair an adopted emergency response or evacuation plan or route because of the standard procedures and compliance with standard industry practices and there is **no impact**.

Operational Impacts

There will be no operational impacts. The proposed uses of a parking lot, open space, and coastal access does not add any operational impacts to hazards and hazardous materials for the Project; therefore, there is **no impact**.

Therefore, with regard to the criteria set forth in CEQA Guidelines Section 15162(a), the changes proposed would not result in any new significant impact with respect to hazards and hazardous materials.

6.3 Cumulative Impacts

The VAPP project, either individually or cumulatively, will not result in significant impacts to biological resources in the newly designated Essential Fish Habitat in the Grand Canal and Ballona Lagoon. No significant effects would occur on biological resources and no other known projects in the vicinity of the Proposed Project that, when considered together, would result in significant adverse impacts to the wildlife and habitats in the vicinity of the Project Site. Therefore, cumulative impacts related to biological resources would be: **less than significant**.

Are these the city's conclusions or those of an independent evaluation?

As identified in the Draft EIR, cumulative noise and vibration impacts are significant and unavoidable. There are related projects proposed in relatively close proximity to the Project Site (within 0 to 0.5 miles). The following sections discuss the cumulative impacts that could occur if construction of these related projects occurs simultaneously with the 128 Hurricane St. lot Project. There are no additional construction or operation cumulative impacts from the Draft EIR.

Related projects, including some portions of the projects in Marina del Rey could still be occurring and overlap with the VAPP 128 Hurricane St. lot construction period. This would bring additional construction activity into the immediate vicinity of the Project Site.

Because the 128 Hurricane St. lot project construction noise and vibration impacts are predicted to have no additional impact to the VAPP Project, and no new mitigation measures required, the cumulative impact would also have no impact beyond what was already analyzed as **significant and unavoidable** in the Draft EIR.

Vibration from construction activities is assessed based on distinct single events using the instantaneous vibration (PPV) from a single piece of equipment. Therefore, the vibration levels experienced at any specific time at a given receptor are typically dominated by a single piece of construction equipment, and the cumulative increase due to additional pieces of equipment is minimal.

Because the 128 Hurricane St. lot project construction vibration impacts are predicted to have no additional impact to the VAPP Project, with no new mitigation measures required, the cumulative impact would also have no impact beyond what was already analyzed as **significant and unavoidable** in the Draft EIR.

7.0 Summary of Environmental Effects

Biology

Regarding the criteria set forth in CEQA Guidelines Section 15162(a), the changes proposed would not result in any new significant impact with respect to biological resources. The project would not result in the loss of individual resources or the permanent reduction of existing habitat, of a state or federal listed endangered, threatened, rare, protected, or candidate species, or a Species of Special Concern or federally listed critical habitat. Also, the project would not result in the loss of individuals or the reduction of existing habitat of a locally designated species or a reduction in a locally designated natural habitat or plant community. There will be no interference with essential fish habitat such that normal species behaviors are disturbed from the introduction of construction noise and vibration to a degree that may diminish the chances for long-term survival of a sensitive species; therefore, **less than significant impacts** would occur during construction and no mitigation is required. Therefore, with regard to the criteria set forth in CEQA Guidelines Section 15162(a), the changes proposed would not result in any new significant impact with respect to biological resources.

Hazards and Hazardous Materials

Regarding the criteria set forth in CEQA Guidelines Section 15162(a), the changes proposed would not result in any new significant impact with respect to hazards and hazardous materials. The Project would not create new significant hazard to the public or the environment because the oil well will be abandoned, and the contaminated soil will be removed and remediated, then replaced with new soil. Releases from existing groundwater and soil contamination is not expected, but would be addressed through standard City BOE conditions and applicable laws and regulations that address the proper handling and disposal of contaminated material. Upon remediation, the site will no longer be a REC. The Project would not create a significant hazard through the routine transport, use, or disposal of hazardous materials. Therefore, with regard to the criteria set forth in CEQA Guidelines Section 15162(a), the changes proposed would not result in any new significant impact with respect to hazards and hazardous materials.

Cumulative

Because the 128 Hurricane St. lot project construction noise and vibration impacts are predicted to have no additional impact to the VAPP Project, with no new mitigation measures required, the cumulative impact would also have no impact beyond what was already analyzed as **significant and unavoidable** in the Draft EIR. Therefore, with regard to the criteria set forth in CEQA Guidelines Section 15162(a), the changes proposed would not result in any new significant impact with respect to cumulative impacts.

8.0 Determination

The analysis of the Project modifications supports the determination that the proposed changes are relatively minor and would not involve new significant environmental effects, or result in a substantial increase in the severity of previously identified significant effects which would call

for, as provided in Section 15162(b) of the State CEQA Guidelines, the preparation of a Subsequent EIR or Negative Declaration. Therefore, the City has elected to prepare this variation of an Addendum to the approved EIR as the appropriate form of documentation to meet the statutory requirements of CEQA.

This Addendum to the EIR environmental analysis evaluates the potential impacts of the proposed modifications in relation to the current environmental conditions, and in consideration of the environmental findings for the Project. The analysis contained herein demonstrates that all of the impact issues previously examined in the approved EIR would remain unchanged with the proposed modifications.

9.0 Appendices

- A. VAPP Phase II ESA
- B. VAPP 128 Hurricane St. - Phase II ESA Amendment with Removal Action Workplan
- C. Essential Fish Habitat Assessment
- D. Habitat Management Mitigation Plan (HMMP)
- E. VAPP 128 Hurricane St. Voluntary Oversight Application
- F. Venice Wetlands Jurisdictional Delineation Report
- G. Sea Level Rise Report
- F. VAPP 128 Hurricane St. Site Plan

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