City of Los Angeles
Department of City Planning • Environmental Analysis Section
City Hall • 200 N. Spring Street, Room 750 • Los Angeles, CA 90012

FINAL ENVIRONMENTAL IMPACT REPORT

SOUTHEAST LOS ANGELES COMMUNITY PLAN AREA

This document, together with the Draft EIR and its appendices, comprise the Final EIR as required under the California Environmental Quality Act

4051 South Alameda Street Project

Case Number: ENV-2012-920-EIR
State Clearinghouse Number: 2014061030

Project Location: 4051 South Alameda Street, Los Angeles, California, 90058
Council District: 9

Project Description: Parcel Map No. AA-2012-919-PMLA and a Site Plan Review to permit the subdivision of one 562,314 net square-foot parcel into four lots (Lot 1: 3.23 net acres, Lot 2: 3.23 net acres, Lot 3: 3.23 net acres, and Lot 4: 3.23 net acres) in the M2-2 Zone. The project includes the construction of four industrial buildings consisting of Building 1: 115,973 square feet and 123 parking spaces, Building 2: 133,680 square feet and 79 parking spaces, Building 3: 116,724 square feet and 96 parking spaces, and Building 4: 113,743 square feet and 106 parking spaces. The applicant is requesting the merger of the right-of-way of 40th Place and the two alleys north and south of 40th Place.

APPLICANT:
Tony Yu
Pima Alameda Partners, LLC

PREPARED BY:
Sapphos Environmental, Inc.

ON BEHALF OF:
The City of Los Angeles
Department of City Planning
Environmental Analysis Section

JUNE 2016

TABLE OF CONTENTS

Section		Page
I	Introduction	I-1
II	List of Commenters	II-1
III	Responses to Comments	III-1
IV	Corrections and Additions to the Draft EIR	IV-1
V	Mitigation Monitoring Plan	V-1

Appendices

Appendix A	Comment Letters on the Draft EIR
Appendix B	LADOT Traffic Study Policies and Procedures
Appendix C	Caltrans Guide for the Preparation of Traffic Impact Studies
Appendix D	Preliminary Health Risk Evaluation – Lancer Site, January 18, 1995
Appendix E	Site Investigation Report – Lancer Site, October 29, 2003
Appendix F	Phase I Environmental Site Assessment, September 1, 2006
Appendix G	Phase II and Limited Phase III Environmental Site Assessment, October 9, 2006
Appendix H	Phase I/II Environmental Site Assessment, May 25, 2006
Appendix I	Hexavalent Chromium Analysis, November 3, 2006
Appendix J	Preliminary Risk Assessment, May 31, 2007
Appendix K	Soil Vapor Survey, March 2011
Appendix L	DTSC Arsenic Strategies
Appendix M	DTSC Human Health Risk Assessment (HHRA) Note
Appendix N	DTSC Letter on Site Characterization and Health Risk Assessment
Appendix O	Local Hire Agreement
Appendix P	City Bureau of Sanitation Letter, January 14, 2016

I. INTRODUCTION

A. INTRODUCTION

Before approving a project, the California Environmental Quality Act (CEQA) requires the lead agency to prepare and certify a Final Environmental Impact Report (Final EIR). The contents of a Final EIR are specified in Section 15132 of the CEQA Guidelines, as follows:

> *The Final EIR shall consist of:*
>
> *(a) The Draft EIR or a revision of the Draft.*
>
> *(b) Comments and recommendations received on the Draft EIR either verbatim or in summary.*
>
> *(c) A list of persons, organizations, and public agencies commenting on the Draft EIR.*
>
> *(d) The responses of the Lead Agency to significant environmental points raised in the review and consultation process.*
>
> *(e) Any other information added by the lead agency.*

As described in Sections 15088, 15089, 15090 and 15132 of the State *CEQA Guidelines,* the Lead Agency must evaluate comments received on the Draft EIR and prepare written responses and consider the information contained in a Final EIR before approving a project. The evaluation and response to public comments is an important part of the CEQA process as it allows the following: (1) the opportunity to review and comment on the methods of analysis contained within the Draft EIR; (2) the ability to detect any omissions that may have occurred during preparation of the Draft EIR; (3) the ability to check for accuracy of the analysis contained within the Draft EIR; (4) the ability to share expertise; and (5) the ability to discover public concerns.

Project Summary

The proposed project includes the construction of a new industrial park consisting of four buildings. Building 1 consists of a single story with a mezzanine that occupies approximately 115,973 total square feet and provides 123 parking spaces; Building 2 consists of two stories that occupy approximately 133,680 total square feet and provides 79 parking spaces; Building 3 consists of a single story with a mezzanine that occupies approximately 116,724 total square feet and provides 96 parking spaces; and Building 4 consists of a single story with a mezzanine that occupies approximately 113,743 total square feet and provides 106 parking spaces. In total, the proposed project would occupy approximately 353,375 square feet of warehouse space, 112,745 square feet of office space, and 14,000 square feet of manufacturing space. The heights of each of the four buildings range from 37 feet to a maximum building height of 40 feet. Consistent with the policies of the Urban Design Chapter of the Southeast Los Angeles Community Plan, the proposed project design includes the installation of shielded exterior area lighting wall packs mounted to the faces of the buildings 29 feet above the finished floor to provide nighttime light shielding for the nearest residence, a duplex located approximately 150 feet west of the proposed project site at 4015 and 4017 Long Beach Avenue West. Surface parking would be located adjacent to the front and side facades of the four proposed buildings. The proposed project has been designed with the

rear of Buildings 1 and 2 and the rear of Buildings 3 and 4 facing each other, and the remaining three faces of each building have been designed with pedestrian-scale features such as decorative concrete panels in different shades of beige with gray trim and glazing to break up the building facades, mechanical roof equipment completely screened from view, enclosure of trash areas, and operable windows on the mezzanine level. A landscape buffer would separate the public sidewalks from the parking lots, and the following street dedications would be made to the city:

- 5' street widening on Martin Luther King, Jr. Blvd.
- 8.5 street widening on the north and 12.5' street widening on the south of South Alameda Street
- 22' street widening on 41st Street

Pedestrian/vehicular conflicts would be minimized through a perimeter sidewalk with clearly defined driveways located at breaks in a continuous landscape strip.

The following table shows the ROW dedications for the streets surrounding the project site:

Street Name	Existing SELACP			SELACP Update			Mobility Plan Update		
	Class.	ROW Width (feet)	Roadway Width (feet)	Class.	ROW Width (feet)	Roadway Width (feet)	Class.	ROW Width (feet)	Roadway Width (feet)
41st Street	Major Hwy Class II	104	80	Collector	64	44	Collector	66	40
Alameda Street	Major Hwy Class II	104	80	Major Street	---	---	Avenue III	72	46
Martin Luther King Blvd.	Local (Standard)	60	36	Local (Standard)	60	36	Local (Standard)	60	36
Long Beach Ave. [1]	Major Hwy Class II	104	80	Collector	64	44	Boulevard I	136	100

The project has been reviewed under the existing Transportation Element standards. However, the required dedications under Mobility Plan 2035 would be as in the table above.

The City of Los Angeles Zoning Ordinance designates the proposed project area as "M2-2," Light Industrial Zone.[2] The purpose of the M2 zoning classification is to allow for lower-impact industrial uses such as clothing design and manufacturing, furniture design and manufacturing, packaging and assembly, warehouse/distribution, biomedical research/manufacturing, and wholesale sales. Light industry also includes a variety of "neighborhood industrial services" that benefit from the close geographic relationship to customers, wholesalers, and related services. Such uses include animal hospitals and kennels, automobile service and painting, lumber yards and specialty construction materials.

[1] Long Beach Avenue is designated as a Major Highway II in the existing SELACP and proposed update to the SELACP which requires a dedicated right-of-way width of 104 feet and a roadway width of 80 feet The current dedicated right-of-way width of Long Beach Avenue is 140 feet which includes 60 feet of right-of-way for the Metro Blue Line light rail line. Long Beach Avenue is designated as a Boulevard I in Mobility Plan 2035 which requires a dedicated right-of-way width of 136 feet which includes the 60 feet of Blue Line right-of-way. The currently dedicated right-of-way width of 140 feet complies with the requirements of the existing and proposed SELACP and Mobility Plan 2035.

[2] City of Los Angeles Municipal Code, Chapter 1, Article 2, Section 12.19.

B. BACKGROUND

As defined by Section 15050 of the CEQA Guidelines, the City of Los Angeles Planning Department is the Lead Agency for the Project. A Notice of Preparation (NOP) was prepared and circulated on June 17, 2014, through July 17, 2014, for the required 30-day public review period to solicit input on the scope and content of the EIR. The NOP and letters of comment received on the NOP are Appendices I and II, respectively, of the Draft EIR.

The Draft EIR was completed and forwarded to the Governor's Office of Planning and Research (OPR), and a Notice of Completion (NOC) was posted at both OPR and the Office of Los Angeles County Clerk on January 22, 2015. Copies of the Draft EIR and Notice of Availability (NOA) were mailed to 350 representatives and interested parties. The Draft EIR was made available for public review at the City of Los Angeles website until March 9, 2015, for a period of 46 days (January 22, 2015, through March 9, 2015). An NOA of the Draft EIR for public review was advertised in the *Los Angeles Times* newspaper, as well as sent via regular mail to 85 public agency representatives and 265 interested parties, including private organizations and individuals.

In addition, copies of the Draft EIR were available during the public review period at three local libraries:

Vernon Branch Library
4504 South Central Avenue
Los Angeles, CA 90011
(323) 234-9106

Junipero Serra Library
4607 South Main Street
Los Angeles, CA 90037
(323) 234-1685

Los Angeles Central Library
630 West 5th Street
Los Angeles, CA 90071
(213) 228-7000

Although the 46-day public comment period closed on March 9, 2015, at 5 p.m., the City received and accepted the submittal of thirteen (13) late letters of comment from individuals and one (1) late letter of comment from a City agency. In total, the City received seven (7) letters of comment from agencies and eighty-one (81) letters of comment from individuals and organizations.

The 4051 South Alameda Street Project EIR comprises two sections consisting of the Draft EIR and the Final EIR. Both of these sections will be submitted to the decision-makers including the City Council for their use, consideration, and certification prior to taking action on the proposed project.

C. ORGANIZATION OF THE FINAL EIR

Together with the Draft EIR, this document constitutes the Final EIR for the Project and includes the following sections:

Section I. Introduction: This section provides an introduction to the Final EIR.

Section II. List of Commenters: This section includes a list of the persons and agencies who submitted comments on the Draft EIR. Original comment letters are also included in Appendix A, Comment Letters on the Draft EIR.

Section III. Responses to Comments: This section includes responses to each of the comments submitted by persons and agencies listed in Section II.

Section IV. Corrections and Additions to the Draft EIR: This section provides corrections and additions to the Draft EIR, based on comments received during and after the public review period and based on staff-initiated text changes. These changes are minor and do not add significant new information that would affect the analysis or conclusions presented in the Draft EIR. They do not add significant new information to the Draft EIR or result in more severe significant environmental impacts associated with the proposed project; and do not require recirculation of the Draft EIR. CEQA only requires recirculation of a Draft EIR when "significant new information" is added to a Draft EIR. Section 15088.5 of the CEQA Guidelines states that "New information added to an EIR is not 'significant' unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project's proponents have declined to implement." CEQA Guidelines Section 15088.5 also provides that "Recirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR."

Section V. Mitigation Monitoring Plan: This section includes all of the mitigation measures identified to reduce or avoid environmental impacts of the project and notes the monitoring phase, the enforcement phase, and the applicable department or agency responsible for ensuring that each mitigation measure is implemented.

Appendices: The appendices to this document include copies of all the comments received on the Draft EIR and additional information cited to support the responses to comments:

Appendix A	Comment Letters on the Draft EIR
Appendix B	LADOT Traffic Study Policies and Procedures
Appendix C	Caltrans Guide for the Preparation of Traffic Impact Studies
Appendix D	Preliminary Health Risk Evaluation – Lancer Site, January 18, 1995
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Appendix N	DTSC Letter on Site Characterization and Health Risk Assessment
Appendix O	Local Hire Agreement
Appendix P	City Bureau of Sanitation Letter, January 14, 2016

II. LIST OF COMMENTERS

The agencies and organizations/persons listed below provided written or email comments on the Draft EIR to the City of Los Angeles (City) during and after the formal public review period from January 22, 2015, to March 9, 2015. Copies of the comments are included in Appendix A to this document. Copies of the Draft EIR and NOA were mailed to 85 public agency representatives, including 8 to responsible agencies.

A. FEDERAL AGENCIES

The City did not receive a letter of comment from any federal agency.

B. STATE AGENCIES

B1. California Department of Transportation
Rick Holland, Acting Branch Chief, Community Planning & LD/IGR Review
District 7 Office of Transportation and Planning
100 S. Main Street, MS 16
Los Angeles, CA 90012

B2. California Department of Toxic Substances Control
Haissam Y. Solloum, P.E., Senior Engineer
Brownfields and Environmental Restoration Program – Chatsworth Office
9211 Oakdale Ave.
Chatsworth, CA 91311

B3. California Public Utilities Commission
Chi Cheung To, P.E.
Utilities Engineer
Rail Crossings and Engineering Section
Safety and Enforcement Division
320 West 45th Street, Suite 500
Los Angeles, CA 90013

B4. Governor's Office of Planning and Research
Scott Morgan, Director, State Clearinghouse
1400 10th Street
Sacramento, CA 95812-3044

B5. Governor's Office of Planning and Research
Scott Morgan, Director, State Clearinghouse
1400 10th Street
Sacramento, CA 95812-3044

C. REGIONAL AND LOCAL AGENCIES

No letters of comment were received from regional and local agencies.

D. CITY AGENCIES AND RELATED ENTITIES

D1. City of Los Angeles Department of Water and Power
Earl Moosbrugger, PE
Resources Development and Supply Assessment Group
Water Resources
111 N. Hope St., Room 1450
Los Angeles, CA 90012

D2. City of Los Angeles Department of Sanitation
Ali Poosti, Division Manager
Wastewater Services Division
2714 Media Center Dr.
Los Angeles CA 90065

E. INDIVIDUALS

An NOA of the Draft EIR for public review was sent to 265 interested parties as well as 220 property owners and occupants within a 500-foot radius of the proposed project.[1]

The City received 81 letters of comment from interested parties.

E1. Victorina Alcoser
E2. Andrew Altamirano
E3. Jose Angel Amigon
E4. Victoria Angon
E5. Eulalia Baranda
E6. Valerie Belt
E7. Michelle Black
E8. Silvia Borges
E9. Craig Borstein
E10. Bruce Campbell
E11. Bruce Campbell
E12. Bruce Campbell
E13. Bruce Campbell
E14. Bruce Campbell
E15. Bruce Campbell
E16. Antonio Cano
E17. Jesus Chagoya
E18. Carmelo Cruz
E19. Juan Diego
E20. Leticia Flores
E21. Gwendolyn Forrest
E22. Janneth Garcia
E23. Maria Garcia
E24. Artemio Gonzalez
E25. Crystal Gonzalez
E26. Maria V. Gonzalez
E27. Ira Gottlieb and Bush Gottlieb

[1] These addresses and 500-foot radius map are on file at the City of Los Angeles Planning Department.

E28. Lisa Green
E29. Nallely Hernandez
E30. Norma Hernandez
E31. Salvador E. Hernandez
E32. Fousto Herrera
E33. Karen Iglesias
E34. Arcadio Jacinto
E35. David Jo
E36. Kathy Knight
E37. Bryan Lee
E38. Carlos Lopez
E39. Jose Lopez
E40. Maria Lorenzo
E41. Adulfo Marin
E42. Juliana Martinez
E43. Mario Montano
E44. Leslie Jeanne Morava
E45. Leonile Munoz
E46. Jack Neff
E47. Jack Neff
E48. Ernesto Nevarez
E49. Ernesto Nevarez
E50. Senorina Nieva
E51. Erika Perrez
E52. Linda Piera-Avila
E53. Efrain Pinoa
E54. John Quigley
E55. William Ramirez
E56. R.S. Rense
E57. Anahi Reyes
E58. Anne Richardson
E59. Miriam Rodriguez
E60. Abel Ruiz
E61. Samuel Ruiz
E62. Eugene Ruyle
E63. Eugene Ruyle
E64. Marilyn Sanchez
E65. Fernando Santay
E66. Damien Serrano
E67. Ramya Sivasubramanian and Spencer Eldred
E68. Nancy Smith
E69. Jonathan Sosa
E70. Laura Soto
E71. Lisa Taylor
E72. Mr. Tezozomoc
E73. Mr. Tezozomoc
E74. Mr. Tezozomoc
E75. Sonia Torres
E76. Jose Urias
E77. Enrique Vasquez
E78. Teresa Ventura

E79. Ayanna Ware
E80. Marcy Winograd
E81. Carol Yost

The following 88 individuals' names were included in a petition sent in by Mr. Tezozomoc:

Alberto Alonso-Fradejas
Andrew Altamirano
Leon Arellano
Eve Avila
Radhika Balakrishnan
Stephen Bartlett
Valerie Belt
Zoe Brent
Geovanni Brewer
Heather Chang
M. Jahi Chappell
Emma Cramp
Maureen Cruise
Ariana DeLena
Rebecah Ericksen
Maritza Estrada
Gwendolyn Forrest
Nicole Frazier
Sonia Gamboa
Joel Garcia
L. Geraghty
Sheila Goldner
Sissel Hawkes
Helgaleena Healingline
Frank Hill
Susette Horspool
Alfredo Huante
Tanya Kerssen
Paula Kleihauer
Cindyroy Komoto
Brigget LeClair
Jose Lopez
Rachel Lujan
Patricia Maddock
Brent Maddock
Tomas Madrigal
Alec Marken
Michelle Mascarenhas
Kathleen Masser
Richard Matthews
Jimi McKay
Sara Mersha
Jean Molina
Mario Montano
Sergio Monteiro

Jesse Moorman
Leslie Morava
Tirso Moreno
Jack Neff
Cordula Ohman
Lauren Ornelas
Molly Ortiz
Victor Ortiz
Linda Piera-Avila
Perias Pillay
Martha Pool
John Quigley
Tristan Quinn-Thibodeau
Juan Ramirez
Nicole Richardson
Denise Robb
Lorraine Sanchez
Keith Sauter
Scarlettah Schaefer
Margaret Schultz-Akerson
Paul Sheldon
Nancy Smith
Megg Sohn
Anna Sorkina
Lauren Spetoskey
Allie Splain
Camilla Maria Vittoria Succetti
Giovanni Andrea Succetti
Lisa Taylor
Amaru Tejeda
Ivana Topalovic
Thuha Tran
Genaro Ulloa
Gene Ulmer
Stacy Valdez
Dona Van Bloemen
Ayanna Ware
Meredyth Wilson
Marcy Winograd
Elaine Wittert
Erica Wohldmann
Will Yeager
Carol Yost

III. RESPONSES TO COMMENTS

INTRODUCTION

This section contains a summary of the distribution list for the Draft EIR and a listing of the parties that provided comments during the public review period. The distribution list/respondents have been divided into the following categories:

A. Federal Agencies
B. State Agencies
C. Regional and Local Agencies
D. City Agencies and Related Entities
E. Individuals

Table 3-1, *Summary of Comments on the Draft EIR*, provides a list of the comment letters received and a summary of issues raised in response to the Draft EIR.

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Table 3-1
Summary of Comments on the Draft EIR

Letter No.	SUMMARY OF WRITTEN COMMENTS	Project Description	Environmental Setting	Aesthetics and Views	Air Quality	Archaeological/Paleontological Resources	Historical Resources	Geology	Greenhouse Gas Emissions	Hazards and Hazardous Materials	Hydrology and Water Quality	Land Use and Planning	Noise	Population, Housing, and Employment	Public Services	Recreation	Transportation and Circulation	Utilities	Alternatives	Other CEQA Considerations	Other Comments	EXPLANATION OF OTHER
Public Agencies																						
B1	State of California Department of Transportation Rick Holland, Acting Branch Chief, Community Planning & LD/IGR Review District 7 Office of Transportation and Planning 100 S. Main Street, MS 16 Los Angeles, CA 90012																X					
B2	State of California Department of Toxic Substances Control Haissam Y. Solloum, P.E., Senior Engineer Brownfields and Environmental Restoration Program – Chatsworth Office 9211 Oakdale Ave. Chatsworth, CA 91311									X												
B3	State of California Public Utilities Commission Chi Cheung To, P.E. Utilities Engineer Rail Crossings and Engineering Section Safety and Enforcement Division 320 West 45th Street, Suite 500 Los Angeles, CA 90013																X	X				
B4	State of California Governor's Office of Planning and Research Scott Morgan, Director, State Clearinghouse 1400 10th Street Sacramento, CA 95812-3044																			X		Acknowledgment of receipt and distribution to State agencies

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Letter No.	SUMMARY OF WRITTEN COMMENTS	Project Description	Environmental Setting	Aesthetics and Views	Air Quality	Archaeological/Paleontological Resources	Historical Resources	Geology	Greenhouse Gas Emissions	Hazards and Hazardous Materials	Hydrology and Water Quality	Land Use and Planning	Noise	Population, Housing, and Employment	Public Services	Recreation	Transportation and Circulation	Utilities	Alternatives	Other CEQA Considerations	Other Comments	EXPLANATION OF OTHER
B5	State of California Governor's Office of Planning and Research Scott Morgan, Director, State Clearinghouse 1400 10th Street Sacramento, CA 95812-3044																			X		Acknowledgment of transmittal of comments received after the close of the comment period
D1	City of Los Angeles Department of Water and Power Earl Moosbrugger, PE Resources Development and Supply Assessment Group Water Resources 111 N. Hope St., Room 1450 Los Angeles, CA 90012																	X				
D2	City of Los Angeles Department of Sanitation Ali Poosti, Division Manager Wastewater Services Division 2714 Media Center Dr. Los Angeles CA 90065																	X				

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Individuals and Businesses																						
E1	Victorina Alcoser No address provided																				X	Support of project
E2	Andrew Altamirano Andrew_altamirano@yahoo.com				X												X				X	Environmental Justice
E3	Jose Angel Amigon 516 E 61st Los Angeles, CA 90003																				X	Support of project
E4	Victoria Angon No address provided																				X	Support of project
E5	Eulalia Baranda No address provided																				X	Support of project
E6	Valerie Belt vbelt@hotmail.com				X												X				X	Environmental Justice
E7	Michelle Black 2200 Pacific Coast Highway, Suite 318 Hermosa Beach, CA 90254	X	X		X					X		X	X			X			X	X		Adequacy of mitigation measures
E8	Silvia Borges No address provided																				X	Support of project
E9	Craig Borstein 11766 Wilshire Blvd., Suite 820 Los Angeles, CA 90025	X	X	X													X					
E10	Bruce Campbell madroneweb@aol.com	X	X		X					X							X			X		Request for recirculation of Draft EIR because NOP comments letters were not included in Draft EIR appendix. City classification of project as not regional in significance.
E11	Bruce Campbell madroneweb@aol.com	X	X		X					X							X			X		

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E12	Bruce Campbell madroneweb@aol.com																X			X	X	Environmental Justice, Request for recirculation of Draft EIR because NOP comments letters were not included in Draft EIR appendix
E13	Bruce Campbell madroneweb@aol.com				X															X		Environmental Justice, Request for recirculation of Draft EIR because NOP comments letters were not included in Draft EIR appendix, Cumulative impacts
E14	Bruce Campbell madroneweb@aol.com	X			X												X				X	Environmental justice
E15	Bruce Campbell madroneweb@aol.com																					Request for recirculation of Draft EIR because NOP comments letters were not included in Draft EIR appendix
E16	Antonio Cano No address provided																				X	Support for project
E17	Jesus Chagoya No address provided																				X	Support for project
E18	Carmelo Cruz No address provided																				X	Support for project
E19	Juan Diego No address provided																				X	Support for project
E20	Leticia Flores lety@impact4989.com																				X	Support for project
E21	Gwendolyn Forrest gmforrest@hotmail.com				X																X	Environmental justice
E22	Janneth Garcia janneth@impact4989.com																				X	Support for project
E23	Maria Garcia No address provided																				X	Support for project

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E24	Artemio Gonzalez temo0335@gmail.com																				X	Support for project
E25	Crystal Gonzalez crystal.t.gonzalez@gmail.com															X						
E26	Maria V. Gonzalez 4865 Ascot Ave. Los Angeles, CA 90011																				X	Support for project
E27	Ira Gottlieb buddyg@bushgottlieb.com															X						
E28	Lisa Green lisaannverde@gmail.com															X						
E29	Nallely Hernandez sach.nelly@gmail.com																				X	Support for project
E30	Norma Hernandez No address provided																				X	Support for project
E31	Salvador E. Hernandez No address provided																				X	Support for project
E32	Fousto Herrera No address provided																				X	Support for project
E33	Karen Iglesias kareni2@me.com																				X	Support for project
E34	Arcadio Jacinto No address provided																				X	Support for project
E35	David Jo No address provided																				X	Support for project
E36	Kathy Knight Kathy.knight@verizon.net											X				X					X	Environmental justice. Healthy activity of gardening for families not analyze in EIR
E37	Bryan Lee No address provided																				X	Support for project
E38	Carlos Lopez No address provided																				X	Support for project
E39	Jose Lopez joseclopez@hotmail.com				X												X				X	Environmental justice.
E40	Maria Lorenzo No address provided																				X	Support for project

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E41	Adulfo Marin No address provided																				X	Support for project
E42	Juliana Martinez No address provided																				X	Support for project
E43	Mario Montano mmontano@coloradocollege.edu				X												X				X	Environmental justice
E44	Leslie Jeanne Morava leslie.morava@gmail.com				X								X			X	X				X	Environmental justice
E45	Leonile Munoz No address provided																				X	Support for project
E46	Jack Neff jackneff01@yahoo.com	X			X				X	X		X					X	X		X	X	Organization of Draft EIR. Request for extension of comment period. Developers request for concessions. Environmental justice
E47	Jack Neff jackneff01@yahoo.com																			X		Request for extension of comment period.
E48	Ernesto Nevarez 52041 Panorama Dr. Morongo Valley, CA 92256									X							X					
E49	Ernesto Nevarez portofaztlan@yahoo.com																			X		Request for acknowledgment of second submittal of comments
E50	Senorina Nieva No address provided																				X	Support for project
E51	Erika Perrez No address provided																				X	Support for project
E52	Linda Piera-Avila lindap_a@verizon.net				X							X				X					X	Environmental justice
E53	Efrain Pinoa No address provided																				X	Support for project
E54	John Quigley spectralq@aol.com				X							X	X			X				X	X	Cumulative impacts. Environmental justice

Table 3-1
Summary of Comments on the Draft EIR

Letter No.	SUMMARY OF WRITTEN COMMENTS	Project Description	Environmental Setting	Aesthetics and Views	Air Quality	Archaeological/Paleontological Resources	Historical Resources	Geology	Greenhouse Gas Emissions	Hazards and Hazardous Materials	Hydrology and Water Quality	Land Use and Planning	Noise	Population, Housing, and Employment	Public Services	Recreation	Transportation and Circulation	Utilities	Alternatives	Other CEQA Considerations	Other Comments	EXPLANATION OF OTHER
E55	William Ramirez No address provided																				X	Support for project
E56	R.S. Rense rippost@verizon.net																				X	Opposition to project. Request that it be made a park.
E57	Anahi Reyes No address provided																				X	Support for project
E58	Anne Richardson 610 S. Ardmore Avenue Los Angeles, CA 90005 arichardson@publiccounsel.org				X											X					X	Disputing the economic benefits of the project.
E59	Miriam Rodriguez No address provided																				X	Support for project
E60	Abel Ruiz No address provided																				X	Support for project
E61	Samuel Ruiz No address provided																				X	Support for project
E62	Eugene Ruyle cuyleruyle@mac.com				X				X										X		X	Environmental justice
E63	Eugene Ruyle Eugene.ruyle@csulb.edu											X							X			
E64	Marilyn Sanchez No address provided																				X	Support for project
E65	Fernando Santay No address provided																				X	Support for project
E66	Damien Serrano No address provided																				X	Support for project
E67	Ramya Sivasubramanian and Spencer Eldred 1314 2nd Street Santa Monica, CA 90401 seldred@nrdc.org				X				X			X				X			X		X	Request for acknowledgment of attached comments. Questioning adequacy of mitigation measures
E68	Nancy Smith nancysourceress@gmail.com				X												X				X	Environmental justice
E69	Jonathan Sosa seldred@nrdc.org																				X	Support for project

Table 3-1
Summary of Comments on the Draft EIR

Letter No.	SUMMARY OF WRITTEN COMMENTS	Project Description	Environmental Setting	Aesthetics and Views	Air Quality	Archaeological/Paleontological Resources	Historical Resources	Geology	Greenhouse Gas Emissions	Hazards and Hazardous Materials	Hydrology and Water Quality	Land Use and Planning	Noise	Population, Housing, and Employment	Public Services	Recreation	Transportation and Circulation	Utilities	Alternatives	Other CEQA Considerations	Other Comments	EXPLANATION OF OTHER
E70	Laura Soto seldred@nrdc.org																				X	Support for project
E71	Lisa Taylor lisathetay@gmail.com				X							X	X			X						
E72	Mr. Tezozomoc tezozomoc@hotmail.com				X												X				X	Environmental justice
E73	Mr. Tezozomoc tezozomoc@hotmail.com																			X		Request to be informed of hearing and decision information
E74	Mr. Tezozomoc tezozomoc@hotmail.com																			X		Attached petition containing signatures of 88 persons opposed to the project
E75	Sonia Torres No address provided																				X	Support for project
E76	Jose Urias No address provided																				X	Support for project
E77	Enrique Vasquez No address provided																				X	Support for project
E78	Teresa Ventura No address provided																				X	Support for project
E79	Ayanna Ware tollyzeekay@gmail.com				X												X				X	Environmental justice
E80	Marcy Winograd winogradteach@gmail.com											X				X					X	Environmental justice
E81	Carol Yost yost@hotmail.com				X												X				X	Environmental justice

A. FEDERAL AGENCIES

No letters of comment were received from federal agencies.

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B. STATE AGENCIES

LETTER NO. B1

California Department of Transportation
Rick Holland, Acting Branch Chief, Community Planning & LD/IGR Review
District 7 Office of Transportation and Planning
100 S. Main Street, MS 16
Los Angeles, CA 90012

COMMENT NO. B1-1

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The proposed project includes the construction of a new industrial park consisting of four warehousing facility buildings totaling 480,000 square feet gross floor area including ancillary office spaces.

Attached please find Caltrans letter prepared on July 14, 2014. In the Draft Environmental Impact Report (DEIR) prepared in January 2015 and in the Appendix IS-5 Traffic Impact Study (TIS) prepared on September 26, 2012, Caltrans traffic concerns have not been addressed.

RESPONSE NO. B1-1

The City of Los Angeles (City) has noted the reference to concerns raised in Caltrans' July 14, 2014 letter. The concerns raised in the July 14, 2014 letter are addressed below.

Regarding the necessity of a traffic analysis of the State's highway facilities, the traffic analysis was conducted per scope of study identified in a memorandum of understanding (MOU) signed in consultation with the City of Los Angeles Department of Transportation (LADOT). Since the proposed project site is entirely within the jurisdiction of the City, LADOT requires the traffic study to follow the guidelines established in its "Traffic Study Policies and Procedures" document. The most recent version of the guidelines, dated August 2014, includes a section that addresses the need for analysis of State highway facilities. The following is an excerpt from LADOT guidelines relevant to State highway facilities (refer to Section E, page 8 of Traffic Study Policies and Procedures, which is included as Appendix B of the Final EIR):

> *FREEWAY IMPACT ANALYSIS SCREENING CRITERIA*
>
> *Pursuant to the Freeway agreement executed in October 2013 between LADOT and Caltrans District 7, traffic studies may be required to conduct a focused freeway impact analysis in addition to the CMP analysis described above. If the proposed project meets any of the following criteria, the applicant will be directed to the Caltrans' Intergovernmental Review section for a determination on the need for analysis and, if necessary, the methodology to be utilized for a freeway impact analysis:*
>
> - *The project's peak hour trips would result in a 1-percent or more increase to the freeway mainline capacity of a freeway segment operating at LOS E or F (based on an assumed capacity of 2,000 vehicles per hour per lane); or*
> - *The project's peak hour trips would result in a 2-percent or more increase to the freeway mainline capacity of a freeway segment operating at LOS D (based on an assumed capacity of 2,000 vehicles per hour per lane); or*

- *The project's peak hour trips would result in a 1-percent or more increase to the freeway mainline capacity of a freeway off-ramp operating at LOS E or F, based on an assumed ramp capacity of 1,500 vehicles per hour per lane); or*
- *The project's peak hour trips would result in a 2-percent or more increase to the freeway mainline capacity of a freeway off-ramp operating at LOS D, based on an assumed ramp capacity of 1,500 vehicles per hour per lane).*

Accordingly, the proposed project's traffic study and existing conditions section on freeway segment analysis included an analysis of the proposed project's estimated trip generation and distribution, existing traffic counts, lane configuration and level of service (LOS). Information for freeway segment and ramp intersections was analyzed to determine if the proposed project meets the agreed upon criteria in order to proceed with freeway impact analysis using the Caltrans Guide for the Preparation of Traffic Impact Studies (latest version, December 2002, which is included as Appendix C to the Final EIR). The freeway segments of I-10 EB (East of Alameda Street, and West of Alameda Street) as well as I-10 WB (East of Alameda Street, and West of Alameda Street) were analyzed. The results of this analysis indicated that the proposed project does not meet any of the criteria requiring a freeway impact analysis. At freeway LOS E or F, project trips must increase freeway peak hour volume by 100 in either direction (i.e., 1 percent of 5-lane freeway capacity, 10,000 vehicles per hour). The existing I-10 Freeway segments in the study area are operating at LOS F. The project contributes a maximum of 22 trips in both EB and WB direction of the freeway (Table IV G.3, p. IV.G-8 of the Draft EIR) during the peak hour, which is less than the 100 trips threshold requiring additional impact analysis.

The comments raised in the NOP letter on July 14, 2014, concerning cumulative traffic impacts are addressed in the Draft EIR Section IV.G Traffic, page IV.G-17, and in the Traffic Impact Study (Appendix III IS-5 of the Draft EIR, pages 22 through 24, and Addendum to Traffic Impact Study, Appendix IX to the Draft EIR, pages 2, 5, 7–9, and 23). Project trip assignments to I-10 and on/off ramps were completed for use in the screening level evaluation to determine if the project traffic contribution to freeway and off-ramps is large enough for the analysis of remaining items mentioned in the July 14, 2014, letter. As discussed above, the screening level evaluation showed that the project traffic contribution to freeway and off-ramps is not large enough to warrant further analysis.

The City has determined that the project is not regionally significant, as defined by Section 15206(b)(2) of the CEQA Guidelines, since the project is not an industrial, manufacturing, or processing plant, or industrial park that plans to house more than 1,000 persons, occupy more than 40 acres of land, or encompass more than 650,000 square feet of floor area. The proposed project consists of 994 planned employees. The project area is 12.9 acres, and the total floor area of all four proposed buildings is 480,120 square feet. Therefore, the project meets none of the criteria that require it to be considered as regionally significant. Therefore, the proposed project is not of regional significance and would not change trip patterns or induce growth of trips regionally.

A cumulative analysis was undertaken for all the study surface intersections as required by LADOT Policy and Procedures. However, because the number of peak-hour trips generated by the proposed project would not exceed the applicable threshold of 100 peak-hour trips in either direction on the I-10 Freeway, the project's traffic contribution to freeways and off-ramps was determined to be not large enough to include in the analysis as per LADOT "Traffic Study Policies and Procedures" document. As a result, a cumulative analysis was determined not to be required for freeways and off-ramps.

COMMENT NO. B1-2

Again, the TIS did not include a traffic analysis of the State's highway facilities. There are 1,021/171 AM/PM cumulative peak hour trips.

RESPONSE NO. B1-2

As discussed in Response to Comment No. B1-1, the City of Los Angeles (City) has noted the necessity of a traffic analysis of the State's highway facilities. The traffic analysis was conducted per scope of study identified in the MOU signed in consultation with LADOT. Since the proposed project site is entirely within the jurisdiction of the City of Los Angeles, LADOT requires the traffic study to follow the guidelines established in its "Traffic Study Policies and Procedures" document. The most recent version of the guidelines, dated August 2014, includes a section that addresses the need for analysis of State highway facilities. The following is an excerpt from LADOT guidelines relevant to State highway facilities (refer to Section E, page 8 of Traffic Study Policies and Procedures, which is included as Appendix B of the Final EIR):

> *FREEWAY IMPACT ANALYSIS SCREENING CRITERIA*
>
> *Pursuant to the Freeway agreement executed in October 2013 between LADOT and Caltrans District 7, traffic studies may be required to conduct a focused freeway impact analysis in addition to the CMP analysis described above. If the proposed project meets any of the following criteria, the applicant will be directed to the Caltrans' Intergovernmental Review section for a determination on the need for analysis and, if necessary, the methodology to be utilized for a freeway impact analysis:*
>
> - *The project's peak hour trips would result in a 1-percent or more increase to the freeway mainline capacity of a freeway segment operating at LOS E or F, based on an assumed capacity of 2,000 vehicles per hour per lane); or*
> - *The project's peak hour trips would result in a 2-percent or more increase to the freeway mainline capacity of a freeway segment operating at LOS D (based on an assumed capacity of 2,000 vehicles per hour per lane); or*
> - *The project's peak hour trips would result in a 1-percent or more increase to the freeway mainline capacity of a freeway off-ramp operating at LOS E or F, based on an assumed ramp capacity of 1,500 vehicles per hour per lane); or*
> - *The project's peak hour trips would result in a 2-percent or more increase to the freeway mainline capacity of a freeway off-ramp operating at LOS D, based on an assumed ramp capacity of 1,500 vehicles per hour per lane).*

Accordingly, the proposed project's traffic study and existing conditions section on freeway segment analysis included an analysis of the proposed project's estimated trip generation and distribution, existing traffic counts, lane configuration and LOS. Information for freeway segment and ramp intersections was analyzed to determine if the proposed project meets the agreed upon criteria in order to proceed with freeway impact analysis using the Caltrans Guide for the Preparation of Traffic Impact Studies (latest version, December 2002). The freeway segments of I-10 EB (East of Alameda Street, and West of Alameda Street) as well as I-10 WB (East of Alameda Street, and West of Alameda Street) were analyzed. The results of this analysis indicated that the proposed project does not meet any of the criteria requiring a freeway impact analysis. At freeway LOS E or F, project trips must increase freeway peak hour volume by 100 in either direction (i.e., 1 percent of 5-lane freeway capacity, 10,000 vehicles per hour). The existing I-10 Freeway segments in the study area are operating at LOS F. The project contributes a maximum of 22 trips in both EB and WB direction of the freeway (Page IV.G-8, Table IV.

G.3) during the peak hour, which is less than the 100 trips threshold requiring additional impact analysis.

Cumulative traffic impacts are addressed in Draft EIR Section IV.G Traffic, page IV.G-17, and in the Traffic Impact Study (Appendix III IS-5 of the Draft EIR, pages 22 through 24, and Addendum to Traffic Impact Study, Appendix IX to the Draft EIR, pages 5, 7–9, and 23). The City has determined that the project is not regionally significant, as defined by Section 15206(b)(2) of the CEQA Guidelines, since the project is not an industrial, manufacturing, or processing plant, or industrial park that plans to house more than 1,000 persons, occupy more than 40 acres of land, or encompass more than 650,000 square feet of floor area. The proposed project consists of 994 planned employees. The project area is 14 acres, and the total floor area of all four proposed buildings is 480,120 square feet. Therefore, the project meets none of the criteria that require it to be considered as regionally significant. Therefore, the proposed project is not of regional significance and would not change trip patterns or induce growth of trips regionally. Section IV.G Traffic, page IV.G-17 and the Traffic Impact Study (Appendix III IS-5 of the Draft EIR, pages 22 through 24, and Addendum to Traffic Impact Study, Appendix IX to the Draft EIR, pages 5, 7–9, and 23) in the Draft EIR discuss in detail why additional cumulative analysis, including further discussion of state facilities in the vicinity of the project, would not be required under CEQA.

COMMENT NO. B1-3

In addition, the SOLA Village Project, a mixed use project consisting of 2.53 million square feet of development, is a few blocks away from the project site. Based on the size of the both of these projects, a significant cumulative traffic impact to the State facilities may occur.

RESPONSE NO. B1-3

Your comment regarding the cumulative traffic impacts from the proposed project has been noted. The criteria to determine if a traffic study should include a freeway impact analysis is outlined in LADOT's "Traffic Study Policies and Procedures" document (August 2014) (refer to Section E, page 8 of Traffic Study Policies and Procedures, Appendix B of the Final EIR). The procedures require an EIR to compare a project's traffic generation and distribution data to existing freeway traffic volumes, lane configuration, and LOS information. The SOLA Village Project will be required to conduct a freeway impact analysis if it exceeds the trip generation and distribution requirements for LADOT's Traffic Study on the freeway facilities. The Notice of Preparation (NOP) for the SOLA project (July 2014) was subsequent to that of the proposed project (June 2014). As required by Section 15125(a) of the State California Environmental Quality Act (CEQA) Guidelines, the project environmental setting was described based on the conditions as they existed at the time of publication of the NOP. The SOLA Village Project would need to consider a combination of projects along with the proposed project in the cumulative impact discussion as guided by standards of practicality and reasonableness for each of the related past, present, and probable future projects.

COMMENT NO. B1-4

As a reminder, in Caltrans' Guide "The level of service (LOS) for operating State highway facilities is based upon measures of effectiveness (MOEs). Caltrans endeavors to maintain a target LOS at the transition between LOS 'C' and LOS 'D' on State highway facilities. If an existing State highway facility is operating at less than the appropriate target LOS, the existing MOE should be maintained." The existing LOS on the freeway should be disclosed regardless of how many trips will be assigned to the highway. Currently the LOS on I-10 and I-110 are operating at or near capacity during peak hours. Additional vehicle trips from the project or related projects may contribute significant impacts to the I-10 and I-110. The decision makers should be aware of this issue and be prepared to mitigate cumulative traffic impacts in the future.

RESPONSE NO. B1-4

The City of Los Angeles has noted the comment relating to LOS and cumulative traffic impacts. To analyze cumulative traffic impacts, traffic study guidelines require an analysis of trip generation, distribution and level of service at key intersections and roadways using the list of all planned and approved projects in the vicinity of the project that would be assumed to be built prior to construction of the project. Accordingly, a list of such projects was obtained from the City and a total of five projects were identified for cumulative traffic analysis. The estimated traffic volume from these projects was added to project traffic volumes and the existing traffic volumes (multiplied by a traffic growth factor to account for any smaller projects and population growth through the opening year of the project). The intersection level of service determined with this combined volume was used to measure cumulative traffic impacts. A cumulative analysis was undertaken for all the study surface intersections as required by LADOT Policy and Procedures. However, as discussed in Response to Comment Nos. B1-1 and B1-2 above, the project's traffic contribution to freeways and off-ramps was determined to be not large enough to include in the analysis. As a result, a cumulative analysis was deemed unnecessary for freeways and off-ramps.

LOS F (more demand than capacity) criteria were used in the traffic study to determine if freeway impact analysis would be required for the proposed project. The proposed project's traffic contribution for freeway I-10 eastbound and westbound segments, east and west of Alameda Street, as well as the intersection of I-10 eastbound off ramp at Alameda Street and the intersection of I-10 westbound off ramp is no more than 22 vehicles (in terms of passenger car equivalent) in any direction during any peak hour. Considering five lanes of travel on the freeway, any traffic impact of this amount of traffic from the proposed project alone would be insignificant. Specifically, with respect to the MOE for the nearest highway on-ramps at I-10 eastbound ramps at Alameda Street and I-10 westbound ramps at Alameda Street, LOS E (at or near capacity level) criteria were used in the traffic study to determine if freeway impact analysis would be required for the project. The project's traffic contribution is no more than 22 vehicles (in terms of passenger car equivalent) in any direction during any peak hour, which does not constitute a significant impact, based on the City's criteria established in the traffic study policies and procedure per agreement with Caltrans, in relation to the baseline condition, the future baseline with project, or the future baseline with related projects. The October 2014 Addendum to the Traffic Impact Study, (Appendix IX in Volume VI of the Draft EIR) includes an analysis of I-10 freeway ramps and mainline segments (at Alameda Street) to show that the project-related 22 vehicles per hour would not be considered significant to change LOS from the existing MOE. The 22-project related trips do not include cumulative trips. The I-10 freeway segments at Alameda Street are currently at LOS E, but ramp intersections are at LOS C during the peak hours and these facilities would not worsen with project traffic. Cumulative trips on Freeway segments were not estimated as the project's contribution to freeway segments did not meet volume threshold for further analysis as per the LADOT "Traffic Study Policies and Procedures" document. The proposed project is a relocation of four light manufacturing facilities to a new location (per project plans); thus, although all 351 project-related trips were analyzed for purpose of the traffic study in accordance with the ITE Manual, the majority of the trips (over 50 percent) already occur in the baseline conditions. No trip subtraction was taken due to any existing on-street project traffic in order to assume a conservative worst-case scenario. No-project baseline conditions, as discussed in Alternative A of Chapter IV Alternatives, is based on the assumption that no project would be constructed and the existing conditions at the site would remain unchanged.

COMMENT NO. B1-5

In the spirit of mutual cooperation, we encourage the City to work with Caltrans in an effort to evaluate traffic impacts, identify potential improvements, and establish a funding mechanism that helps mitigate cumulative transportation impacts in the area.

RESPONSE NO. B1-5

Your comment encouraging mutual cooperation between the City and Caltrans is noted. The City is working with Caltrans on these issues as evidenced by inclusion of a Freeway Impact Analysis Screening Criteria in its "Traffic Study Policies and Procedures" document (August 2014).

LETTER NO. B2

California Department of Toxic Substances Control
Haissam Y. Solloum, P.E., Senior Engineer
Brownfields and Environmental Restoration Program – Chatsworth Office
9211 Oakdale Ave.
Chatsworth, CA 91311

COMMENT NO. B2-1

The Department of Toxic Substances Control (DTSC) has received the Draft Environmental Impact Report (EIR) for the subject property.

The DTSC review of the Draft EIR revealed that Hazardous Substances are present at the subject project site. Based on this review the following are DTSC's comments.

RESPONSE NO. B2-1

This comment provides introductory transmittal comments and states that the DTSC review of the Draft EIR revealed the presence of Hazardous Materials on the project site. Comments on the Draft EIR, including the comment that Hazardous Materials are present at the subject project site, follow with responses.

COMMENT NO. B2-2

1. During the Initial Study Phase, DTSC made comments indicating that concentrations of Hazardous Substances are present at the site. Property owners provided DTSC with various investigation reports confirming the presence of Hazardous Substances at the site.

RESPONSE NO. B2-2

During the Initial Study phase, concerns were raised about the potential for the subject property to contain hazardous substances. A Human Health Screening Evaluation (HHSE) prepared by Kleinfelder and dated July 15, 2014, was performed and submitted to the California Environmental Protection Agency, Department of Toxic Substances Control (DTSC) for review during October 2014, and is included as Appendix VIII in Volume VI of the Draft EIR. The HHSE was undertaken using U.S. EPA Risk Screening Levels based on guidance published by DTSC in 2013: *Human Health Risk Assessment (HHRA) Note3 – DTSC Recommended Methodology for Use of EPA Regional Screening Levels (RSL) in the Human Risk Assessment Process at Hazardous Waste Sites and Permitted Facilities*. The HHSE indicates that there are no constituents of potential concern (COPCs) present in environmental media (soil, soil vapor, or groundwater) at concentrations that may be associated with adverse health effects under future industrial land uses. The HHSE resulted in a determination that further investigation or mitigation to protect subsurface utility workers during construction or employees during operation of the facility is not warranted, based on cancer and non-cancer risk levels being below established regulatory standards.

The results of the HHSE in coordination with several surface and subsurface investigations conducted at the proposed project site indicate that the concentrations of herbicides, organochlorine pesticides, hexavalent chromium, volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), polychlorinated biphenyls (PCBs) and total petroleum hydrocarbons (TPH) are generally below regulatory limits for commercial land use. Elevated concentrations of certain metals (primarily lead and

arsenic) were detected in a limited number of samples, but in no discernible pattern. Based on the analytical results, the available data do not indicate any significant release of contamination to the Property (p. IV.E-4 and p. IV.E-9-10 of the Draft EIR). The HHSE states that no COPCs are present (Appendix VIII in Volume VI of the Draft EIR), and all investigation reports were submitted to DTSC for review during the Initial Study/NOP phase.

The following reports were reviewed in the preparation of the HHSE, and are included as Appendices D through K in the Final EIR:

- Preliminary Health Risk Evaluation – Lancer Site, January 18, 1995. Prepared by Hart Crowser, Inc. (excerpt) (Appendix D to Final EIR)
- Site Investigation Report – Lancer Site, October 29, 2003. Prepared by Pacific Edge Engineering, Inc. (Appendix E to Final EIR)
- Phase I Environmental Site Assessment, September 1, 2006. Prepared by Professional Service Industries, Inc. (PSI). (Appendix F to Final EIR)
- Phase II and Limited Phase III Environmental Site Assessment, October 9, 2006. Prepared by PSI. (Appendix G to Final EIR)
- Phase I/II Environmental Site Assessment, May 25, 2006. Prepared by Advantage Environmental Consultants, LLC. (Appendix H to Final EIR)
- Hexavalent Chromium Analysis, November 3, 2006. Prepared by PSI. (Appendix I to Final EIR)
- Preliminary Risk Assessment, May 31, 2007. Prepared by PSI. (Appendix J to Final EIR)
- Soil Vapor Survey, March 2011. Prepared by SCS Engineers. (Appendix K to Final EIR)
- Phase I Environmental Site Assessment, June 2013. Prepared by SCS Engineers. (Appendix VII to Draft EIR)

The site was found to be suitable for commercial/industrial development based on the conceptual site model described in the HHSE, which identified subsurface utility workers and on-site employees as appropriate human receptor groups, and as presented in a comparison of the maximum concentration of any analyte detected at least once in soil or soil vapor to levels of regulatory concern. The HHSE methods, approach, and findings are discussed in more detail in the following responses. The HHSE can be found in Volume VI, Appendix VIII of the Draft EIR.

Collectively, these reports provide a representative summary of environmental conditions on the subject site based on:

1. <u>The number and location of soil and soil vapor samples that have been collected and analyzed for chemical constituents of potential concern based on past land uses.</u> As summarized in the Phase I ESA (page 15) and documented in the reports identified above, 176 soil samples have been collected from 146 locations across the subject site, and 16 soil vapor samples have been collected from 14 locations across the subject site. The sampling locations were distributed to provide information representative of conditions across the site.

2. <u>The breadth of chemical analyses performed on the soil and soil vapor samples collected from the subject site.</u> As summarized in the HHSE (page 2), the soil samples were analyzed for petroleum hydrocarbons by Environmental Protection Agency (EPA) Methods 418.1 and 8015M, semi-volatile organic compounds (SVOCs) by EPA Method 8270C, volatile organic compounds (VOCs) by EPA Method 8260B, California Title 22 metals by EPA Method 6010B, hexavalent chromium by EPA Method 7199,

organochlorine pesticides, and polychlorinated biphenyls (PCBs) by EPA Method 8081A/8082, and herbicides by EPA Method 8151. Soil vapor samples collected from five or 15 feet below ground surface were analyzed for VOCs by EPA Method 8260B. The sample types and analytical methods broadly provide information representative of conditions across the site. Each chemical type generally representative of environmental conditions on property developed in an urban setting was addressed by the analyses performed.

3. The quality of the analytical data developed from the analysis of environmental samples collected from the subject site. As summarized in the HHSE (page 2), laboratory analytical reports, including analysis of quality assurance/quality control samples, were available and reviewed for most soil data and for the soil vapor data. The analytical results appear to be of adequate quality and suitable for use in a risk assessment based on the analysis of laboratory blank samples, LCS, matrix spike and matrix spike duplicate samples, all of which were within acceptable control ranges. Reporting limits apparently were sufficiently low to detect concentrations of health concern.

Based on the HHSE, understanding the regulatory points of departure for risk management, a cumulative cancer risk of 1×10^{-6} indicates that there may be one additional case of cancer for every 1,000,000 people in a population exposed to the COPCs under the exposure conditions identified in the HHSE. To put this cancer risk in perspective, the background rate of cancer in the United States is approximately 1 in 3 (American Cancer Society, 2010). Therefore, of the roughly 300,000,000 citizens of the United States, 100,000,000 can expect to develop some form of cancer at some time in their lives. If the entire population of the United States were to reside on a site where, due to chemical contamination, the excess lifetime cancer risk was 1×10^{-6}, then an additional 300 individuals might develop some form of cancer as a result, and the total number of cancer cases would be 100,000,300.

As indicated on page 10 of the HHSE, the analysis was performed consistent with the guidance provided by the DTSC, using Risk Screening Levels for estimating cancer risk and non-cancer risk. Threshold values for risk management decisions based on Cal/EPA and federal EPA policy are 1×10^{-6} (one in one million) for cancer risks and a non-cancer hazard quotient of 1.0. For lead, which is evaluated by different methodology than all other constituents of concern, the threshold for risk management decisions based on Cal/EPA policy is a soil concentration of 320 mg/kg; therefore, where lead concentrations in soil are less than 320 mg/kg, action is not required.

The results of the analysis are provided in Tables 4 and 5 of the HHSE for the construction scenario based on a subsurface utility worker. Using the methods described in the HHSE, the total cancer risk was determined to be 7×10^{-7} which is less than the Cal/EPA regulatory point of departure of 1×10^{-6} for risk management decisions based on cancer risk. The non-cancer risk was 0.867 which is less than the Cal/EPA regulatory point of departure of 1.0 for risk management decisions based on non-cancer risk. The results of the analysis are provided in Tables 6 and 7 of the HHSE for the operational phase of the project based on an analysis for potential soil vapor intrusion. Using the methods described in the HHSE, the total cancer risk was determined to be 6×10^{-7} which is less than the Cal/EPA regulatory point of departure of 1×10^{-6} for risk management decisions based on cancer risk. The non-cancer risk was 0.009 which is less than the Cal/EPA regulatory point of departure of 1.0 for risk management decisions based on non-cancer risk.

According to the Phase I Environmental Site Assessment prepared by SCS Engineers dated June 2013 and included as Appendix VII, Volume V of the Draft EIR (Phase I ESA), the subject site has supported residential and commercial land uses since the early 1900s as described in previous environmental reports (Pacific Edge 2003; Advantage 2006; PSI 2006-2007; GeoSystems 2007; SCS Engineers 2011)

summarized on pages 11–16 of the Phase I ESA. These land uses are detailed in Figure IV.E-1 Historical Hazardous Materials Land Uses at 4051 South Alameda Project Site of the Draft EIR. Based on information in the Phase I, Phase II, and limited Phase III Environmental Site Assessments prepared by Professional Services Industries, Inc. in 2006 and summarized in the Phase I ESA, the site has been cleared of all residential and commercial land uses, and the infrastructure removed without additional developments since 2006 (Appendix VII of the Draft EIR). Releases of hazardous materials that require mitigation or remediation have not occurred as a result of residential and commercial land uses.

Based on the Phase I ESA, there is no expected potential for the release of hazardous materials at the current vacant project site (Appendix VII in Volume V of the Draft EIR). There have been past land uses on adjoining property that likely have contributed to the presence of some hazardous materials on those sites (see Figure IV.E-1, Historic Hazardous Materials Land Uses at 4051 South Alameda Street Project Site), however no recognized environmental conditions regarding the proposed project site being exposed to contamination migrating from off-site sources have been observed (pg. IV.E-4 of the Draft EIR). The Phase I ESA indicated that the concentrations of herbicides, organochlorine pesticides, hexavalent chromium, VOCs, SVOCs, PCBs, and TPH were generally below regulatory limits for commercial land use, however elevated concentrations of certain metals (primarily lead and arsenic) were detected in a limited number of samples but below levels that would pose a risk or hazards to people or property (pg. IV.E-9-10 of the Draft EIR).

As further detailed in the HHSE, four of 141 soil samples contained arsenic at a concentration that exceeded the background concentration of 12 mg/kg. Four of 142 soil samples contained lead at a concentration greater than 320 mg/kg, and three of those samples only slightly exceeded the limit (334, 335, and 354 mg/kg). The range of arsenic concentrations reported in 141 samples was 0.25 mg/kg to 90.3 mg/kg with an average concentration of 2.5 mg/kg and a 95% upper confidence limit on the average concentration of 3.9 mg/kg. Further investigation or mitigation is not considered to be warranted since the 95% upper confidence limit of the average concentration is 3.9 mg/kg as compared to the estimated background concentration of 12 mg/kg; and only four of 141 soil samples contained arsenic at a concentration greater than 12 mg/kg. The range of lead concentrations reported in 142 samples was 0.42 mg/kg to 726 mg/kg with an average concentration of 70.9 mg/kg and a 95% upper confidence limit on the average concentration of 92.2 mg/kg. Because actual exposures of subsurface utility workers is likely to be best represented by an average of site soil concentrations, and because the 95% upper confidence limit of the average concentration is 92.2 mg/kg as compared to the acceptable concentration of 320 mg/kg, further investigation or mitigation is not considered to be warranted based on the presence of lead in site soil.

As documented in the HHSE, the total cancer risk was 7×10^{-7}, which is less than the Cal/EPA regulatory point of departure for risk management decisions based on cancer risk (i.e., 1×10^{-6}). The non-cancer hazard index was determined to be 0.867, which is below the Cal/EPA regulatory point of departure for risk management decisions based on non-cancer hazard (i.e., 1.0) (pg. IV.E-9 of the Draft EIR).

The Department of Toxic Substances Control (DTSC) has reviewed the site characterization and health risk assessment for the site and has concluded that the site is suitable for Industrial/Commercial use, and that future development or rezoning of the property for other than Industrial/Commercial use will require additional analysis and risk evaluation by DTSC to determine the suitability of the site for such use (included as Appendix N to the Final EIR).[1]

[1] Department of Toxic Substances Control. 22 December 2015. Letter from Brownfields and Environmental Restoration Program—Chatsworth Office, Haissam Y. Salloum, Senior Engineer, to City of Los Angeles, Department of City Planning, William Lamborn.

COMMENT NO. B2-3

2. DTSC did not receive oversight evidence of a Regulatory Agency making a determination that concentrations of hazardous substances do not require further action.

3. Regulatory Agency oversight and determination is required to clear this site for development.

RESPONSE NO. B2-3

As set forth above, the results of the HHSE in coordination with several surface and subsurface investigations conducted at the proposed project site indicated that the concentrations of herbicides, organochlorine pesticides, hexavalent chromium, volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), polychlorinated biphenyls (PCBs) and total petroleum hydrocarbons (TPH) were generally below regulatory limits for commercial land use. There were elevated concentrations of certain metals (primarily lead and arsenic) detected in a limited number of samples, but in no discernible pattern. Based on the analytical results, the available data do not indicate any significant release of contamination to the Property (Pg. IV.E-4 of the Draft EIR). Indeed, all of the available evidence supports the conclusion that there are no COPCs present in environmental media (soil, soil vapor, or groundwater) at concentrations that may be associated with adverse health effects under future industrial land uses. The Department of Toxic Substances Control (DTSC) has reviewed the site characterization and health risk assessment for the site and has concluded that the site is suitable for Industrial/Commercial use, and that future development or rezoning of the property for other than Industrial/Commercial use will require additional analysis and risk evaluation by DTSC to determine the suitability of the site for such use (included as Appendix N to the Final EIR).[2]

COMMENT NO. B2-4

4. Based on the aforementioned comments a release of Hazardous Substances is present at the site. Any decision on required action for this release should be made by an authorized regulatory agency. This issue should be complied with prior to finalizing the EIR and it should be clearly stated in the EIR along with supporting documents. The EIR should identify how any required investigation and/or remediation will be conducted, and which government agency will provide oversight.

RESPONSE NO. B2-4

Multiple studies summarized in Section IV.E and attached as Appendices VII and VIII in Volumes V and VI of the Draft EIR document the absence of COPC's at concentrations that may be adverse. Please see Response to Comment No. B2-2 for more detailed information with respect to the absence of hazardous materials at the project site at concentrations that may be associated with adverse health effects under future industrial land uses. The project applicant entered into a Voluntary Cleanup Agreement with the Department of Toxic Substances Control (DTSC) in connection with DTSC's review of the available documentation regarding the presence of hazardous materials at the site. DTSC has reviewed the site characterization and health risk assessment for the site and has concluded that the site is suitable for Industrial/Commercial use, and that future development or rezoning of the property for other than Industrial/Commercial use will require additional analysis and risk evaluation by DTSC to determine the suitability of the site for such use (included as Appendix N to the Final EIR).[3]

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[2] Department of Toxic Substances Control. 22 December 2015. Letter from Brownfields and Environmental Restoration Program—Chatsworth Office, Haissam Y. Salloum, Senior Engineer, to City of Los Angeles, Department of City Planning, William Lamborn.

[3] Department of Toxic Substances Control. 22 December 2015. Letter from Brownfields and Environmental Restoration

COMMENT NO. B2-5

5. DTSC provides guidance for Preliminary Endangerment Assessment preparation and cleanup oversight through the Voluntary Cleanup Program (VCP). For additional information on the VCP please visit DTSC's website at www.dtsc.ca.gov.

RESPONSE NO. B2-5

Your comment regarding the availability of Preliminary Endangerment Assessment and cleanup oversight has been noted. The project applicant entered into a Voluntary Cleanup Agreement with the Department of Toxic Substances Control (DTSC) in connection with DTSC's review of the available documentation regarding the presence of hazardous materials at the site. The DTSC has reviewed the site characterization and health risk assessment for the site and has concluded that the site is suitable for Industrial/Commercial use, and that future development or rezoning of the property for other than Industrial/Commercial use will require additional analysis and risk evaluation by DTSC to determine the suitability of the site for such use (included as Appendix N to the Final EIR).[4]

Program—Chatsworth Office, Haissam Y. Salloum, Senior Engineer, to City of Los Angeles, Department of City Planning, William Lamborn.

[4] Department of Toxic Substances Control. 22 December 2015. Letter from Brownfields and Environmental Restoration Program—Chatsworth Office, Haissam Y. Salloum, Senior Engineer, to City of Los Angeles, Department of City Planning, William Lamborn.

LETTER NO. B3

California Public Utilities Commission
Chi Cheung To, P.E.
Utilities Engineer
Rail Crossings and Engineering Section
Safety and Enforcement Division
320 West 45th Street, Suite 500
Los Angeles, CA 90013

COMMENT NO. B3-1

The California Public Utilities Commission (Commission) has jurisdiction over the safety of highway-rail crossings (crossings) in California. The California Public Utilities Code requires Commission approval for the construction or alteration of crossings and grants the Commission exclusive power on the design, alteration and closure of crossings. The Commission's Rail Crossings Engineering Branch (RCEB) is in receipt of the *Draft Environmental Impact Report (DEIR)* for the 4051 South Alameda Street project. The City of Los Angeles (City) is the lead agency.

RESPONSE NO. B3-1

This comment provides introductory transmittal comments and does not directly address the contents of the Draft EIR. Comments on the project and Draft EIR follow with responses.

COMMENT NO. B3-2

The 41st Street at-grade crossing (ID: CPUC No. 001BBH-486.13 and DOT No. 747835D) and the 38th Place crossing (ID: CPUC No. 001BG-486.00 and DOT No. 747607R) are located immediately on the west and east sides of the project site respectively. Currently, there are over 100 combined light-rail and freight train movements per day at the 41st Street crossing, with a maximum speed of 30 miles per hour.

According to the DEIR, the proposed Industrial Park Warehouse project will generate approximately 342 truck trips per day. While the DEIR concludes that the additional traffic would not significantly affect the level of service of the key intersections in the surrounding roadway system, RCEB has concerns on whether the existing simultaneous preemption at the above crossings can adequately clear design vehicles off the tracks prior to train arrivals. RECB recommends the City to investigate current preemption operations at the two (2) crossing locations and implement appropriate safety mitigations if it is needed. Any development adjacent to or near the railroad right-of-way (ROW) should be planned with the safety of the rail corridor in mind.

RESPONSE NO. B3-2

Your comment regarding concerns about the clearance of design vehicles off tracks prior to train arrivals has been noted. Existing simultaneous preemption adequately clears vehicles as shown in the Level of Service (LOS) analysis for adjacent intersections in Appendix IX in Volume VI of the Draft EIR, Addendum to Traffic Impact Study, page 5. According to the Institute of Transportation Engineers *Trip Generation Manual*, 9th Edition, the number of truck trips estimated to be generated by the proposed project is 351.

There are two at-grade rail crossings in the vicinity of the proposed project. The 41st Street at-grade crossing is located immediately on the west side of the project site, while the 38th Place at-grade crossing

is located immediately on the east side of the project site. According to the Addendum to Traffic Impact Study prepared by Traffic Design, Inc. dated October 3, 2014 and included as Appendix IX in Volume VI of the Draft EIR, the proposed project's traffic distribution shows that a maximum of 28 vehicles will use the 41st Street at-grade crossing to travel outbound to the west during the PM peak hour, while a maximum of 7 vehicles will use 38th Place at-grade crossing to travel inbound from the east during the AM and PM peak hours. These crossings are currently used by existing traffic, and are adequately equipped with various warning and safety devices to alert and prevent traffic crossing during train movements across 41st Street and 38th Place, and allow safe crossings of traffic when there are no train movements. Therefore, no additional safety measures are deemed necessary at these at-grade rail crossings to accommodate traffic from the proposed project. Therefore, the proposed project's truck trips are not expected to impact the operation of existing safety devices at the rail road crossings

Although a typical warehouse project of this size is assumed to generate 351 truck trips per day, under Alternative C only, this project is expected not to exceed 75 truck trips per day. Of these, a total of 7 truck trips will be during the AM peak hour (5 inbound, 2 outbound) and 7 during the PM peak hour (2 inbound, 5 outbound). Trucks will travel primarily in the north-south direction and will have minimal travel needs to go east-west crossing railroad tracks. However, the current air quality and noise analysis is conducted to describe the full effects of the 351-truck projects, and the rail crossings' analysis is written to describe full effect of the entire 351 truck trips, to take into account the "worst case" and most conservative scenario of development. The project's traffic distribution shows that a maximum of 28 vehicles will use the 41st Street at-grade crossing to travel outbound to the west during the p.m. peak hour, while a maximum of seven vehicles will use 38th Place at-grade crossing to travel inbound from the east during the a.m. and p.m. peak hours. These crossings are currently used by existing traffic, and are adequately equipped with various warning and safety devices to alert and prevent traffic crossing during train movements across 41st Street and 38th Place, and allow safe crossings of traffic when there are no train movements. Therefore, no additional safety measures are deemed necessary at these at-grade rail crossings to accommodate traffic from the proposed project. Therefore, the proposed project's truck trips are not expected to impact the operation of existing safety devices at the rail road crossings. Additionally, the proposed project is not of regional significance and would not change trip patterns or induce growth of trips regionally.

COMMENT NO. B3-3

Modification to an existing public rail crossing requires authorization from the Commission. RCEB representatives are available for consultation on any potential safety impacts or concerns at crossings. Please continue to keep RCEB informed of the project's development. More information can be found at: http://www.cpuc.ca.gov/PUC/safety/Rail/Crossings/index.htm.

RESPONSE NO. B3-3

Your comment regarding the modification of an existing public rail crossing has been noted. No modifications to existing public rail crossings are proposed. Your name and contact information have been added to the project distribution list, and the City will keep the Rail Crossings and Engineering Section informed of the proposed project's development.

LETTER NO. B4

Governor's Office of Planning and Research
Scott Morgan, Director, State Clearinghouse
1400 10th Street
Sacramento, CA 95812-3044

COMMENT NO. B4-1

The enclosed comment(s) on your Draft EIR was (were) received by the State Clearinghouse after the end of the state review period, which closed on March 6, 2015. We are forwarding these comments to you because they provide information or raise issues that should be addressed in your final environmental document.

The California Environmental Quality Act does not require Lead Agencies to respond to late comments. However, we encourage you to incorporate these additional changes into your final environmental document and to consider them prior to taking action on the proposed project.

Please contact the State Clearinghouse at (916) 445-0613 if there are any questions concerning the environmental review process. If there is a question regarding the above-named project, please refer to the 10-digit State Clearinghouse number (2014061030) when contacting this office.

RESPONSE NO. B4-1

Thank you for forwarding five letters in response to the proposed project that were received after the end of the State review period. These comments have been incorporated into the Final EIR.

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LETTER NO. B5

Governor's Office of Planning and Research
Scott Morgan, Director, State Clearinghouse
1400 10th Street
Sacramento, CA 95812-3044

COMMENT NO. B5-1

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on March 6, 2015, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

"A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

RESPONSE NO. B5-1

This comment acknowledges receipt of the Draft EIR by the State Clearinghouse and that circulation of the Draft EIR to State Agencies has occurred through the State Clearinghouse. The comment documents that State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act (CEQA), have been met. This comment provides introductory transmittal comments and does not directly address the contents of the Draft EIR.

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C. REGIONAL AND LOCAL AGENCIES

No letters of comment were received from regional and local agencies.

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D. CITY AGENCIES AND RELATED ENTITIES

LETTER NO. D1

City of Los Angeles Department of Water and Power
Earl Moosbrugger, PE
Resources Development and Supply Assessment Group
Water Resources
111 N. Hope St., Room 1450
Los Angeles, CA 90012

COMMENT NO. D1-1

We are submitting to you the following comments to the Draft Environmental Impact Report (DEIR) for the 4051 South Alameda Street Project (City Case No. ENV-2012-920-EIR; State Clearinghouse No. 2014061030). These comments reflect our review of the Water Supply chapter only for matters related to water resources for the project; you may receive additional comments from other divisions at LADWP, separately, for other respective areas in the DEIR, such as water infrastructure capacity, etc.

RESPONSE NO. D1-1

This comment provides introductory transmittal comments and does not directly address the contents of the Draft EIR. Comments on the project and Draft EIR follow with responses.

COMMENT NO. D1-2

1. The last sentences of the first paragraphs of p. IV.H-5 and p. B-175 of the DEIR – see excerpt below – indicate a 2007-2011 average annual flow value. Footnote 7 (p.IV.H-5) and 6 (p. B-175) specify the source (dated May 2008) for the 2007-2011 average annual flow value; however, the source does not contain the 2007-2011 actual/projected average annual flow values. Therefore, please replace the footnotes on p.IV.H-5 and p. B-175.

Paragraph Excerpt from DEIR, p. IV.H-5 and p. B-175 of Attachment B of Appendix III of DEIR:

"To serve the residents, businesses, and industries of Los Angeles, the LADWP has more than 7,200 miles of pipelines; 699,600 service connections; 59,346 fire hydrants; over 70 pumping stations; and 110 reservoirs and tanks. From 2007 to 2011, the LADWP supplied about 197 billion gallons of water annually for the City's residential and business services.[6]"

Foot note Excerpt from DEIR, p.IV.H-5 and p. B-175 of Attachment B of Appendix III of DEIR:

" Villaraigosa, Antonio R. Securing L.A.'s Water Supply. Prepared by the City of Los Angeles Department of Water and Power. May 2008."

Replace footnote above from DEIR, p.IV.H-5 and p. B-175 with the following, and include the date accessed within the quote below:

"City of Los Angeles, Department of Water and Power, ladwp.com > About Us > Water > Past & Present (https://www.ladwp.com/ladwp/faces/ladwp/aboutus/awater/a-w-pastandpresent?_adf.ctrl-state=il7srf7qf_4&_afrLoop=399895236462180) – Accessed on X/XX/20XX."

RESPONSE NO. D1-2

Your comment has been noted. The requested correction to Section IV.H-5, Utilities and Service Systems (page IV.H-5) has been completed, as noted in Section IV, *Corrections and Additions to the Draft EIR* (Page IV-5), of this Final Environmental Impact Report.

COMMENT NO. D1-3

2. The first sentence after the bullet point list of p. B-178 of Attachment B of Appendix III of DEIR – see excerpt below – appears to imply that sufficient water supplies are available to serve the proposed project because a water supply assessment is not required for this project.

Excerpt from DEIR, p. B-178

"Therefore, the proposed project would not result in significant impacts to utilities and service systems, and no further analysis related to having sufficient water supplies available to serve the proposed project from existing entitlements and resources is warranted."

However, the methodology for determining whether the project's demand is included in supply projections is not based on water supply assessment requirements. Instead, it is based on demographic projections included in the Regional Transportation Plan by the Southern California Association of Governments. Therefore, additional clarification should be provided as follows:

Replace above Excerpt from DEIR, p. B-178 of Attachment B of Appendix III of DEIR:

"Proposed Project is consistent with growth projections anticipated by the SCAG. Consistency with the demographic projection for the City from the 2012 RTP is required for Proposed Project. City's water demand projection in the 2010 UWMP was developed based on the 2008 Regional Transportation Plan (RTP) demographic projection by the Southern California Association of Governments (SCAG) using the 2000 U.S. Census for the City. The 2012 RTP demographic projection for the City was based on the 2010 U.S. Census, and is lower than the 2008 RTP demographic projection. The region's economic growth is usually a major factor behind net migration and the consequent population growth. The economic recession of 2007-2009 had a negative impact on the region's population growth, resulting in decrease in population growth from 2000 Census to 2010 Census. Our preliminary analysis shows that the City water demand projection to year 2035 based on demographic projection from 2012 RTP using population, housing and employment, as well as water conservation, and weather will be lower than the City's water demand projection in the 2010 UWMP. As a result, City's water supply projections in the 2010 UWMP are sufficient to meet the City's water demand projections based on the 2012 RTP."

RESPONSE NO. D1-3

Your comment regarding demographic projections has been noted. The recommended text has been added to Section IV.H of the Draft EIR (see Section IV, *Corrections and Additions to the Draft EIR*, of the Final EIR). Attachment B of Appendix III of the Draft EIR consists of the Initial Study for the proposed project, which is not revised as part of the Draft EIR review process.

"The proposed project is consistent with growth projections anticipated by the SCAG. Consistency with the demographic projection for the City from the 2012 RTP is required for Proposed Project. The City's water demand projection in the 2010 UWMP was developed based on the 2008 Regional Transportation Plan (RTP) demographic projection by the Southern California Association of Governments (SCAG)

using the 2000 U.S. Census for the City. The 2012 RTP demographic projection for the City was based on the 2010 U.S. Census, and is lower than the 2008 RTP demographic projection. The region's economic growth is usually a major factor behind net migration and the consequent population growth. The economic recession of 2007-2009 had a negative impact on the region's population growth, resulting in decrease in population growth from 2000 Census to 2010 Census. Our preliminary analysis shows that the City water demand projection to year 2035 based on demographic projection from 2012 RTP using population, housing and employment, as well as water conservation, and weather will be lower than the City's water demand projection in the 2010 UWMP. As a result, City's water supply projections in the 2010 UWMP are sufficient to meet the City's water demand projections based on the 2012 RTP."

COMMENT NO. D1-4

3. The last sentence of the third paragraph of p.IV.H-8 of the DEIR, see below in bold, appears to imply that the project would not require new water and wastewater treatment facilities or expansion of existing treatment plants because of sufficient capacity at Hyperion Treatment Plant.

Excerpt from DEIR, p. IV.H-8

"**Therefore, with the increased expansion of the HTP service area and a remaining capacity of approximately 88 mgd at HTP, there would be no impacts to utilities and service systems related to the construction of new water or wastewater treatment facilities.**"

However, with respect to water treatment, it is not accurate to estimate the capacity of the existing water treatment plant (LAAFP – Los Angeles Aqueduct Filtration Plant) to meet project demand based on wastewater treatment plant data. Please remove any reference to water treatment from the last sentence of the third paragraph of p.IV.H-8 of the DEIR and address water treatment, separately, using the following:

"The maximum water treatment capacity at the LAAFP is 600 million gallons per day, or approximately 672,000 acre-feet per year (AFY). LAAFP typically treats water from LAA (Los Angeles Aqueduct) and purchases from MWD (Metropolitan Water District). The current average annual flow through LAAFP is approximately 362 million gallons per day, or 405,000 AFY – Acre-feet per year – (averaged over CY 2013). Exhibit 11E, of LADWP's 2010 Urban Water Management Plan (UWMP), shows that the total annual water supplies from LAA and MWD between years 2020 through 2035 are less than 470,000 AFY. The project's water demand is accounted for in the City's future projected demands. Consequently, the current treatment capacity of LAAFP is estimated to be adequate to accommodate future demands. Therefore, there would be no impacts to utilities and service systems related to the construction of new water treatment facilities."

RESPONSE NO. D1-4

Your comment has been noted. Reference to the water treatment on page IV.H-8 of the Draft EIR has been removed and replaced by the text recommended (also see Section IV, *Corrections and Additions to the Draft EIR*, of the Final EIR):

"The maximum water treatment capacity at the LAAFP is 600 million gallons per day, or approximately 672,000 acre-fee per year (AFY). LAAFP typically treats water from LAA (Los Angeles Aqueduct) and purchases from MWD (Metropolitan Water District). The current average annual flow through LAAFP is approximately 362 million gallons per day, or 405,000 AFY – Acre-feet per year – (averaged over CY 2013). Exhibit 11E, of LADWP's 2010 Urban Water Management Plan (UWMP), shows that the total annual water supplies from LAA and MWD between years 2020 through 2035 are less than 470,000

AFY. The project's water demand is accounted for in the City's future projected demands. Consequently, the current treatment capacity of LAAFP is estimated to be adequate to accommodate future demands. Therefore, there would be no impacts to utilities and service systems related to the construction of new water treatment facilities."

COMMENT NO. D1-5

4. The last sentence of the last paragraph of p. B-177 of Attachment B of Appendix III of the DEIR – see excerpt below in bold – appears to imply that the project would not require new water and wastewater treatment facilities or expansion of existing treatment plants because of sufficient capacity at Hyperion Treatment Plant.

Excerpt from DEIR, p. B-177 of Attachment B of Appendix III of DEIR:

"**Therefore, with the increased expansion of the HTP service area and a remaining capacity of approximately 88 mgd at HTP, there would be no impacts to utilities and service systems related to the construction of new water or wastewater treatment facilities or expansion of facilities, causing significant environmental effects and no further analysis is warranted."**

However, with respect to water treatment, it is not accurate to estimate the capacity of the existing water treatment plant (LAAFP – Los Angeles Aqueduct Filtration Plant) to meet project demand based on wastewater treatment plant data. Please remove any reference to water treatment from the last sentence of the last paragraph of p. B-177 of Attachment B of Appendix III of the DEIR and address water treatment, separately, using the following:

"The maximum treatment capacity at the LAAFP is 600 million gallons per day, or approximately 672,000 acre-feet per year (AFY). LAAFP typically treats water from LAA and purchases from MWD. The current average annual flow through LAAFP is approximately 362 million gallons per day, or 405,000 AFY (averaged over CY 2013). Exhibit 11E, of LADWP's 2010 Urban Water Management Plan (UWMP), shows that the total annual water supplies from LAA and MWD between years 2020 through 2035 are less than 470,000 AFY. The project's water demand is accounted for in the City's future projected demands. Consequently, the current treatment plant capacity of LAAFP is estimated to be adequate to accommodate future demands. Therefore, there would be no impacts to utilities and service systems related to the construction of new water treatment facilities."

RESPONSE NO. D1-5

Your comment has been noted. As indicated in Response to Comment No. D1-4, the recommended text has been added to Section IV.H of the Draft EIR (see Section IV, *Corrections and Additions to the Draft EIR*, of the Final EIR, p. IV-7). Attachment B of Appendix III of the Draft EIR consists of the Initial Study for the proposed project, which is not revised as part of the Draft EIR review process.

LETTER NO. D2

City of Los Angeles Department of Sanitation
Ali Poosti, Division Manager
Wastewater Services Division
2714 Media Center Dr.
Los Angeles CA 90065

COMMENT NO. D2-1

This is in response to your January 22, 2015 letter requesting a review of your proposed industrial building project located at 4051 South Alameda Street, Los Angeles, CA 90058. The Bureau of Sanitation has conducted a preliminary evaluation of the potential impacts to the wastewater and stormwater systems for the proposed project

RESPONSE NO. D2-1

This comment provides introductory transmittal comments and does not directly address the contents of the Draft EIR. Comments on the project and Draft EIR follow with responses.

COMMENT NO. D2-2

WASTEWATER REQUIREMENT

The Bureau of Sanitation, Wastewater Engineering Services Division (WESD) is charged with the task of evaluating the local sewer conditions and to determine if available wastewater capacity exists for future developments. The evaluation will determine cumulative sewer impacts and guide the planning process for any future sewer improvements projects needed to provide future capacity as the City grows and develops.

Projected Wastewater Discharges for the Proposed Project:

Type Description	Average Daily Flow per Type Description (GPO/UNIT)	Proposed No. Units	Average Daily Flow (GPD)
Proposed			
Warehouse	30 GPD/1000 SQ.FT	365,945 SQ.FT	10,978
Office Space	170 GPD/1000 SQ.FT	85,181 SQ.FT	14,481
Manufacturing	50 GPD/1000 SQ.FT	29,896 SQ.FT	1,495
Total			**26,954**

SEWER AVAILABILITY

The sewer infrastructure in the vicinity of the proposed project includes an existing 8-inch line that discharges into a 10-inch line on Martin Luther King Jr. Blvd, an existing 8-inch line on 41st St., an existing 8-inch line on 40th Pl., and an existing 10-inch line on Long Beach Ave. The sewage from all these sewers feed into a 10-inch line on Long Beach Ave before discharging into a 45-inch line on 41st Pl. Figure 1 shows the details of the sewer system within the vicinity of the project. The current flow level (d/D) in the 8-inch line that discharges into a 10-inch line on Martin Luther King Jr. Blvd. and the 8-inch line on 40th Pl. cannot be determined at this time without additional gauging.

The current approximate flow level (diD) and the design capacities at *diD* of 50% in the sewer system are as follows:

Pipe Diameter (in)	Pipe Location	Current Gauging d/D (%)	50% Design Capacity
8	Martin Luther King Jr. Blvd.	25	198,599 GPD
10	Martin Luther King Jr. Blvd.	*	360,084 GPD
8	40th Pl.	*	229,323 GPD
8	41st St.	*	229,323 GPD
10	Long Beach Ave. East	*	394,453 GPD
45	41'1 Pl.	30	294,000 GPD
45	41st Pl.	41	427,000 GPD

* No gauging available

Based on the estimated flows, it appears the sewer system might be able to accommodate the total flow for your proposed project. Further detailed gauging and evaluation will be needed as part of the permit process to identify a specific sewer connection point. If the public sewer has insufficient capacity then the developer will be required to build sewer lines to a point in the sewer system with sufficient capacity. A final approval for sewer capacity and connection permit will be made at that time. Ultimately, this sewage flow will be conveyed to the Hyperion Treatment Plant, which has sufficient capacity for the project.

RESPONSE NO. D2-2

Your comment regarding the flow level of the sewer system within the vicinity of the project and the Hyperion Treatment Plant capacity has been noted.

As mentioned in Section IV.H, *Utilities and Service Systems*, of the Draft EIR, the City's Bureau of Sanitation has conducted a preliminary evaluation of the potential impacts to the wastewater and stormwater systems for the proposed project and estimated that the proposed project would generate 26,954 gallons per day of wastewater discharges. Based on the estimated flows within the existing sewer system, the Bureau of Sanitation has determined that the sewer system may be adequate. Additional analysis by the project applicant has indicated that the estimated discharge from the project will be 132,000 gallons per day as shown in Appendix P of the Final EIR. Given that the conservative estimate of the proposed project's discharge is expected to be 132,000 gallons per day, and the City's gauged capacity for the existing sewer system is 822,375 gallons per day, even with the project's discharge contribution there would still be 690,375 gallons per day of remaining capacity in the City's existing system. The City Bureau of Sanitation subsequently has reviewed the project applicant's calculations and revised its estimate of discharge for the project to be 132,000 GPD which is in accordance with the project applicant's calculations. This is reflected in the comment letter dated January 14, 2016[5] (Appendix P to the Final EIR). However, further gauging and evaluation may be required as part of the permit process, and that final approval for sewer capacity and connection permit will be made at that time. Section IV, *Corrections and Additions to the Draft EIR*, on page IV-19 discusses the BOS comment letter dated January 14, 2016.

[5] Poosti, Ali, City of Los Angeles, Division Manager, Wastewater Engineering Services Division, Bureau of Sanitation. January 14, 2016. Subject: 4051 South Alameda Street Project – Notice of Completion and Availability of Draft EIR (REVISED).

To further clarify the distinction between the estimated generation of wastewater discharges from the proposed project and the availability and flow rates of the existing sewer system, the language in Section IV.H-8 of the Draft EIR has been revised as follows:

"The proposed project would not result in significant impacts to utilities and service systems in relation to the construction of new water or wastewater treatment facilities or expansion of facilities. The proposed project site would continue to be serviced by existing City water and wastewater utility lines. The City's Bureau of Sanitation has conducted a preliminary evaluation of the potential impacts to the wastewater and storm water systems for the proposed project and estimated that the proposed project would generate 26,954 gallons per day of wastewater discharges.[6] Based on the estimated flows for the existing sewer system, the Bureau of Sanitation has determined that the sewer system may be adequate. However, additional analysis by the project applicant has indicated that the estimated discharge from the project will be 132,000 gallons per day. Given that the conservative estimate of the proposed project's discharge is expected to be 132,000 gallons per day, and the City's gauged capacity for the existing sewer system is 822,375 gallons per day, even with the project's discharge contribution there would still be 690,375 gallons per day of remaining capacity in the City's existing system. The City Bureau of Sanitation subsequently has reviewed the project applicant's calculations and revised its estimate of discharge for the project to be 132,000 GPD which is in accordance with the project applicant's calculations. This is reflected in the comment letter dated January 14, 2016[7] (Appendix P to the Final EIR). However, further gauging and evaluation may be required as part of the permit process, and that final approval for sewer capacity and connection permit will be made at that time."

To address Mitigation Measure Utilities and Service Systems-1, the City Bureau of Engineering has requested additional gauging as part of the permit process to support the sizing and location of sewer connections. The Draft EIR has made a determination that the stormwater and sewer capacity would be adequate and therefore would not result in a significant impact.

COMMENT NO. D2-3

STORMWATER REQUIREMENTS

The Bureau of Sanitation, Watershed Protection Division (WPD) is charged with the task of ensuring the implementation of the Municipal Stormwater Permit requirements within the City of Los Angeles. We anticipate the following requirements would apply for this project.

POST-CONSTRUCTION MITIGATION REQUIREMENTS

The project requires implementation of stormwater mitigation measures. These requirements are based on the Standard Urban Stormwater Mitigation Plan (SUSMP) and the recently adopted Low Impact Development (LID) requirements. The projects that are subject to SUSMP/LID are required to incorporate measures to mitigate the impact of stormwater runoff. The requirements are outlined in the guidance manual titled *"Development Best Management Practices Handbook -Part B: Planning Activities"*. Current regulations prioritize infiltration, capture/use, and then biofiltration as the preferred stormwater control measures. The relevant documents can be found at: www.lastormwater.org. It is advised that input regarding SUSMP requirements be received in the early phases of the project from

[6] Poosti, Ali, City of Los Angeles, Division Manager, Wastewater Engineering Services Division, Bureau of Sanitation. 24 July 2014. NOP Response Letter. Subject: 4051 South Alameda Street Project – Notice of Preparation EIR.

[7] Poosti, Ali, City of Los Angeles, Division Manager, Wastewater Engineering Services Division, Bureau of Sanitation. January 14, 2016. Subject: 4051 South Alameda Street Project – Notice of Completion and Availability of Draft EIR (REVISED).

WPD's plan-checking staff.

GREEN STREETS

The City is developing a Green Street Initiative that will require projects to implement Green Street elements in the parkway areas between the roadway and sidewalk of the public right-of-way to capture and retain stormwater and urban runoff to mitigate the impact of stormwater runoff and other environmental concerns. The goals of the Green Street elements are to improve the water quality of stormwater runoff, recharge local ground water basins, improve air quality, reduce the heat island effect of street pavement, enhance pedestrian use of sidewalks, and encourage alternate means of transportation. The Green Street elements may include infiltration systems, biofiltration swales, and permeable pavements where stormwater can be easily directed from the streets into the parkways and can be implemented in conjunction with the SUSMP/LID requirements.

RESPONSE NO. D2-3

Your comment regarding post-construction mitigation requirements has been noted. It is acknowledged and understood that there are Standard Urban Stormwater Mitigation Plan / Low Impact Development (SUSMP/LID) post construction requirements. It is further understood that the City is developing a Green Street Initiative with standard plans for Green Streets that can be implemented in conjunction with SUSMP/LID regulations, if applicable and approved at the time of preparation of the SUSMP.[8] The State CEQA Guidelines state the purpose of the EIR is to identify the significant effects on the environment of a project, to identify alternatives to the project, and to indicate the manner in which those significant effects can be mitigated or avoided. The Draft EIR did not identify any significant effects to utility systems, and no mitigation measures were recommended during construction. It is understood that there are state and local regulations that the project will have to adhere to during post construction, such as SUSMP and LID regulations, as well as Green Street Initiative policies if they are adopted by the City of Los Angeles in association with the anticipated consideration of the Complete Streets Manual as Chapter 9 of the City of Los Angeles Mobility Plan 2035 of the City General Plan.

COMMENT NO. D2-4

CONSTRUCTION REQUIREMENTS

The project is required to implement stormwater control measures during its construction phase. All projects are subject to a set of minimum control measures to lessen the impact of stormwater pollution. In addition for projects that involve construction during the rainy season that is between October 1 and April 15, a Wet Weather Erosion Control Plan is required to be prepared. Also projects that disturb more than one-acre of land are subject to the California General Construction Stormwater Permit. As part of this requirement a Notice of Intent (NOI) needs to be filed with the State of California and a Storm Water Pollution Prevention Plan (SWPPP) needs to be prepared. The SWPPP must be maintained on-site during the duration of construction.

RESPONSE NO. D2-4

Your comment regarding construction requirements has been noted. It is understood that the project will disturb more than 1 acre of land and is required to implement stormwater control measures during its construction phase under Order 2009-0009-DWQ amended by 2010-0014-DWQ & 2012-0006-DWQ 10.

[8] City of Los Angeles Bureau of Engineering. Accessed 18 June 2015. *Index to Current Standard Plans.* Available at: http://eng.lacity.org/techdocs/stdplans/index.htm

The General Construction Stormwater Permit regulates storm water runoff from construction sites. To obtain coverage under this General Permit, dischargers shall electronically file the Permit Registration Documents (PRDs), which includes a Notice of Intent (NOI), Storm Water Pollution Prevention Plan (SWPPP), and other compliance related documents required by this General Permit and mail the appropriate permit fee to the State Water Board. It is understood that as part of compliance with the General Construction Stormwater Permit that a Wet Weather Erosion Control Plan is required to be prepared for any construction during the rainy season that is between October 1 and April 15.

COMMENT NO. D2-5

SOLID RESOURCE REQUIREMENTS

The City has a standard requirement that applies to all proposed residential developments of four or more units or where the addition of floor areas is 25 percent or more, and all other development projects where the addition of floor area is 30 percent or more. Such developments must set aside a recycling area or room for onsite recycling activities.

RESPONSE NO. D2-5

Your comment regarding solid resource requirements has been noted. It is understood that a recycling area for on-site recycling activities is required to be set aside, based upon city standard requirements.

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E. INDIVIDUALS

LETTER NO. E1

Victorina Alcoser

COMMENT NO. E1-1

I have lived in Los Angeles, CA for 9 years. I have worked at IMPACT for 5 years. Thanks to this job, I am able to support my family. I am very happy to be working for this company. I'm thankful to my boss, who is a good person.

RESPONSE NO. E1-1

Your comment on the proposed project has been noted. Your concerns will be taken into consideration by the decision makers prior to taking action on the proposed project.

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LETTER NO. E2

Andrew Altamirano

COMMENT NO. E2-1

South LA Sweatshops will have long term detrimental health impact to the residents of South Central Los Angeles

The City Planning Department has announced its intention to allow 4 warehouses to be built with a substandard Draft Environmental Impact Report (Case Number: ENV-2012-920-EIR, AA-2012-919-PMLA, DIR-2013-887-SPR), a move Farm representatives and the community say will have long term detrimental health impacts for local South LA residents. Plans call for 4 warehouse facilities that will draw some 75 diesel big rigs into the area every day, creating an intolerable concentration of diesel fumes and particulate matter in a neighborhood in a warehousing district already saturated with such exhaust, posing the danger of increased risks of cancer, emphysema, asthma, and increased hospitalizations to poor people of color who live in the district. South Central Farm representative Tezozomoc said, "This is an unmistakable and undeniable threat to the health and well being of the people who live here, and that the City Planning Department has accepted a substandard Draft Environmental Impact Report on behalf of PIMA is a clear cut example of environmental racism." I call on the city, " to unconditionally reject the DEIR and return the land to the community to anchor an environmental justice project to begin to clean up the community".

RESPONSE NO. E2-1

Your comment in regard to the health risks from the diesel truck trips generated by the proposed project has been noted. The construction phase air quality impact analysis can be found in the Impact Analysis portion of Section IV.B *Air Quality* of the Draft EIR. Construction related toxic air contaminants (TACs) from diesel particulate emissions will be short-lived (3 months), and therefore do not require a Health Risk Assessment (HRA) from the Office of Environmental Health Hazard Assessment (OEHHA). Diesel particulate emissions only affect the population on a long-term (70-year) basis for cancer impacts, so the impact of short-term TACs from the construction of the proposed project is considered less than significant, as analyzed in Section IV.B (pages IV.B-15 through -18) of the Draft EIR. Construction emissions were analyzed for the six main criteria air pollutants as evident in Table IV.B-8. Emissions from VOCs, NOx, CO, SOx, and $PM_{2.5}$ were calculated to be below the SCAQMD significance threshold. PM_{10}, does have a significant impact during the construction phase, but it can be reduced to below the level of significance with mitigation measures.

For the operations of the proposed project, Section IV.G, *Transportation/Traffic* of the Draft EIR considered 351 truck trips/day based on Institute of Transportation Engineers guidelines. Of the 351, EMFAC 2011, an emissions factor model, estimates that on average 9 percent of the total trucks are diesel fueled trucks for an estimate of 31 diesel fueled trucks, as mentioned in the Human Health Risk Analysis portion of Section IV.B *Air Quality* of the Draft EIR. Because the total daily truck trips are greater than 100, a refined Health Risk Assessment for operational impacts was conducted that identified sensitive receptors and individual cancer risk. Diesel particulate is the majority of health risk among the TACs emitted from both diesel- and gasoline-fueled vehicles, so only diesel particulate emissions are considered for the Health Risk Assessment. As described in Section IV.B (page IV.B-22) of the Draft EIR, the resulting maximum potential cancer risk is 0.3 in a million, which is only 3 percent of the cancer risk threshold of 10 in a million as set by the South Coast Air Quality Management District Rule 1401. In addition to the cancer risk, operational emissions associated with the proposed project for the six main criteria air pollutants are quantified in Table IV.B-9, *Unmitigated Estimated Daily Operational*

Emissions, of the Draft EIR, and were found to be below thresholds of significance established by SCAQMD. Therefore, the proposed project would not result in significant human health risks related to diesel emissions. Further details on the air quality impacts analysis in the operational phase can be found in pages IV.B-18 to B-22 of the Draft EIR.

With Alternative C, Reduced Truck Operations, truck trips would be limited to 75 truck trips per day. As a result, the maximum cancer risk drops to 0.6 percent of the allowable threshold. The alternatives with clean fuel trucks and reduced truck operations would result in fewer diesel emissions.

CEQA centers on whether a project may have a significant effect on the physical environment (CEQA Guidelines, 15064(d)). The purpose of an environmental impact report is to identify the significant effects on the environment of a project, to identify alternatives to the project, and to indicate the manner in which those significant effects can be mitigated or avoided (Pub. Res. Code, §21002.1 subd. (a)). Environmental justice is not considered an area of impact under CEQA, and CEQA does not ask that a project mitigate preexisting conditions. As noted in CEQA Guidelines Section 15064(b), the significance of an activity may vary with the environmental setting. Where there already is a high pollution burden on a community, the relevant question is whether an additional amount of pollution should be considered significant in light of the serious nature of the existing problem.[9]

The Existing Conditions section in Section IV.B *Air Quality* of the Draft EIR includes ambient air quality data gathered from the local air quality monitoring stations. The average concentrations and days above the standard for each criteria air pollutant are listed in Table IV.B-6 *Summary of 2010-2012 Ambient Air Quality Data in the Proposed Project Vicinity* on page IV.B-11 of the Draft EIR. The Air Quality impact analysis relative to the impacts of the proposed project has been further detailed above in this Response to Comment No. E2-1, and is located in Section IV.B *Air Quality* of the Draft EIR. In the Draft EIR, sensitive receptors are defined on page IV.B-11. There are two maps showing their locations: Figure IV.B-1 *Sensitive Receptors* and Figure IV. B-2 *Receptor Grid and Sensitive Receptors*.

COMMENT NO. E2-2

It is clear that Los Angeles City has failed the residents of South LA by considering a substandard DEIR. In 2008 the City of Los Angeles reviewed a project submitted by Horowitz to do one warehouse that encompassed 437,196 sq. ft. (see Case No. ENV-2008-799-MND, VTT-61482, DIR-2008-841-SPR, aka 41st and Alameda Warehouse Project) and at that time there would be 264 truck trips per day. In the recent DEIR PIMA will be developing 481,022 sq. ft. of warehouse space; comprised of 4 buildings and over 2000 car trips per day. In PIMA's proposal they claim a mere 75 trip trucks a day. There is a difference of 189 truck trips per days for a warehouse space that is 10% larger. There is a difference of 70% in truck trips. What is problematic with this assumption is that all further analysis will be based on the underspecified 75 truck trips per day. While this under estimation of the truck trips may get the project approved by the City; the city under Jan Perry has supported this project, it will have long negative impact on the residents of South Los Angeles. In the realm of Air Quality Health Risk Assessment the truck trips are further down estimated to 31 diesel fueled trucks per day. The Kleinfelder's Health Risk Analysis is faulty because it also assumes a degraded amount of truck trips per day; 75 truck trips per day.

[9] Harris, Kamala D. 10 July 2012. *Environmental Justice at the Local and Regional Level: Legal Background*. Prepared by State of California Department of Justice. Available at: http://oag.ca.gov/sites/all/files/agweb/pdfs/environment/ej_fact_sheet.pdf

RESPONSE NO. E2-2

The City of Los Angeles has noted the concern about the discrepancy in the number of truck trips and the resulting health risks. A total of 351 truck trips is assumed in the Air Quality Health Risk Assessment (Appendix V in Volume IV of the Draft EIR) and Section IV.B, *Air Quality*, of the Draft EIR based on the Addendum to the Traffic Impact Study (Appendix IX in Volume VI of the Draft EIR). Of the 351 truck trips, EMFAC 2011 estimates that on average 9 percent of the total trucks are diesel fueled trucks for an estimate of 31 diesel-fueled trucks as mentioned in the Human Health Risk Analysis portion of Section IV.B *Air Quality* of the Draft EIR.

The Draft EIR states on page IV.G-13 that

> *It is calculated that the proposed project will generate approximately 1,966 net passenger car equivalent (PCE) trips per average day. The average weekday net new peak hour PCE trips will be approximately 179 trips during the a.m. peak hour and 190 trips during the p.m. peak hours (Figure IV.G-6, Distribution of Project Traffic, and Figure IV.G-7, Existing [2014] plus Project Traffic Volumes). The traffic analysis also considered the distribution of trips during a.m. and p.m. peak hours in the vicinity of the proposed project (Figure IV.G- 8, Project Traffic at Driveways and Adjacent Intersections).*
>
> *While these estimates were developed based on the ITE's Trip Generation Manual, the project applicant has indicated that truck trips associated with operation of the proposed project would not exceed 75 daily truck trips, which has therefore been analyzed as Alternative C in this Draft EIR (see Attachment E to the Initial Study, which is Appendix III of this Draft EIR).*

The 75 truck trips identified in Alternative C stem from the existing operations at various facilities, which will be consolidated in the proposed project. Currently, there is a maximum of 33 truck trips/day total for the various facilities. The proposed project build out is not expected to significantly increase this number of trips; hence, 75 daily truck trips were taken as the assumption in Alternative C of the Draft EIR.

COMMENT NO. E2-3

Regional Air Quality

The air quality in Southern California does not meet the state and federal standards. The American Lung Association consistently gives Los Angeles County failing grades in the amount of ozone and particulate pollution in the air. Although smog levels are impacted by seasons and weather patterns, smog is visible in the air on most days.

RESPONSE NO. E2-3

The City of Los Angeles has noted the comment about poor air quality in the region as defined by the American Lung Association. The American Lung Association gives an "F" rating for ozone, particulate pollution (24-hour), and particulate pollution (annual) for Los Angeles County. In regard to the California Ambient Air Quality Standards, Los Angeles County has also been designated nonattainment for ozone, PM_{10}, $PM_{2.5}$, nitrogen dioxide, and lead. The Draft EIR evaluates the proposed project with respect to the State CEQA Guidelines. Construction and operations emissions were modeled and compared to the South Coast Air Quality Management District (SCAQMD) Significance Thresholds. Only the PM_{10} construction emissions were found to exceed the SCAQMD significance threshold by 5.6 lbs/day. Mitigation measures are described in the Draft EIR on page IV.B-23 and IV.B-24, which reduce air quality impacts below the threshold of significance. All other criteria pollutants are expected to be below the SCAQMD significance

thresholds for both construction and operation phases. The proposed project is expected to be consistent with the regional 2012 Air Quality Management Plan. Please see pages IV.B-16, IV.B-17, and IV.B-19 of the Draft EIR for further information regarding the proposed project's consistency with state and regional air quality plans.

LETTER NO. E3

Jose Angel Amigon

COMMENT NO. E3-1

My name is Jose Angel Amigón. I live at 516 E. 61st Street, Los Angeles, CA 90003 and I have worked for IMPACT since 2002. I am a floor assistant, a position I am very proud of. Each day I try to improve my performance and am very grateful for this job in being able to support my family.

RESPONSE NO. E3-1

Your comment on the proposed project has been noted. Your concerns will be taken into consideration by the decision makers prior to taking action on the proposed project.

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LETTER NO. E4

Victoria Angon

COMMENT NO. E4-1

Hello, my name is Victoria Angon. I've lived in South Central Los Angeles, California for 17 years. I've worked at IMPACT since January 7, 2004. My position is to inspect all finished work. I like my job and am very happy with my boss and coworkers. Since I've been working with my boss for 11 years, thanks to him, I am able to support my family.

RESPONSE NO. E4-1

Your comment on the proposed project has been noted. Your concerns will be taken into consideration by the decision makers prior to taking action on the proposed project.

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LETTER NO. E5

Eulalia Baranda

COMMENT NO. E5-1

I have work for IMPACT for around 25 years under my employer Tony. I have no complaints. I am happy with the way the working environment operates. I have gained a lot of experience through them teaching me. I like what I do because I know I can achieve good results.

Tony is a generous and good person who cares for his employees. Tony makes sure that everything is running smoothly to get the results that are needed. It is a pleasure working for Tony and I am grateful having to be part of this company for a long time that I seek to continue.

RESPONSE NO. E5-1

Your comment on the proposed project has been noted. Your concerns will be taken into consideration by the decision-makers prior to taking action on the proposed project.

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LETTER NO. E6

Valerie Belt

COMMENT NO. E6-1

South LA Sweatshops will have long term detrimental health impact to the residents of South Central Los Angeles

The City Planning Department has announced its intention to allow 4 warehouses to be built with a substandard Draft Environmental Impact Report (Case Number: ENV-2012-920-EIR, AA-2012-919-PMLA, DIR-2013-887-SPR), a move Farm representatives and the community say will have long term detrimental health impacts for local South LA residents. Plans call for 4 warehouse facilities that will draw some 75 diesel big rigs into the area every day, creating an intolerable concentration of diesel fumes and particulate matter in a neighborhood in a warehousing district already saturated with such exhaust, posing the danger of increased risks of cancer, emphysema, asthma, and increased hospitalizations to poor people of color who live in the district. South Central Farm representative Tezozomoc said, "This is an unmistakable and undeniable threat to the health and well being of the people who live here, and that the City Planning Department has accepted a substandard Draft Environmental Impact Report on behalf of PIMA is a clear cut example of environmental racism." I call on the city, " to unconditionally reject the DEIR and return the land to the community to anchor an environmental justice project to begin to clean up the community".

RESPONSE NO. E6-1

Your comment in regard to the health risks from the diesel truck trips generated by the proposed project has been noted. The construction phase air quality impact analysis can be found in the Impact Analysis portion of Section IV.B *Air Quality* of the Draft EIR. Construction related toxic air contaminants (TACs) from diesel particulate emissions will be short-lived (3 months), and therefore do not require a Health Risk Assessment (HRA) from the Office of Environmental Health Hazard Assessment (OEHHA). Diesel particulate emissions only affect the population on a long-term (70-year) basis for cancer impacts, so the impact of short-term TACs from the construction of the proposed project is considered less than significant, as analyzed in Section IV.B (pages IV.B-15 through -18) of the Draft EIR. Construction emissions were analyzed for the six main criteria air pollutants as evident in Table IV.B-8. Emissions from VOCs, NOx, CO, SOx, and $PM_{2.5}$ were calculated to be below the SCAQMD significance threshold. PM_{10}, does have a significant impact during the construction phase, but it can be reduced to below the level of significance with mitigation measures.

For the operations of the proposed project, Section IV.G *Transportation/Traffic* of the Draft EIR considered 351 truck trips/day based on Institute of Transportation Engineers guidelines. Of the 351, EMFAC 2011, an emissions factor model, estimates that on average 9 percent of the total trucks are diesel fueled trucks for an estimate of 31 diesel fueled trucks, as mentioned in the Human Health Risk Analysis portion of Section IV.B *Air Quality* of the Draft EIR. Because the total daily truck trips are greater than 100, a refined Health Risk Assessment for operational impacts was conducted that identified sensitive receptors and individual cancer risk. Diesel particulate is the majority of health risk among the TACs emitted from both diesel- and gasoline-fueled vehicles, so only diesel particulate emissions are considered for the Health Risk Assessment. As described in Section IV.B (page IV.B-22) of the Draft EIR, the resulting maximum potential cancer risk is 0.3 in a million, which is only 3 percent of the cancer risk threshold of 10 in a million as set by the South Coast Air Quality Management District Rule 1401. In addition to the cancer risk, operational emissions associated with the proposed project for the six main criteria air pollutants are quantified in Table IV.B-9 *Unmitigated Estimated Daily Operational Emissions*

of the Draft EIR, and were found to be below thresholds of significance established by SCAQMD. Therefore, the proposed project would not result in significant human health risks related to diesel emissions. Further details on the air quality impacts analysis in the operational phase can be found in pages IV.B-18 to B-22 of the Draft EIR.

With Alternative C, Reduced Truck Operations, truck trips would be limited to 75 truck trips per day. As a result, the maximum cancer risk drops to 0.6 percent of the allowable threshold. The alternatives with clean fuel trucks and reduced truck operations would result in fewer diesel emissions.

CEQA centers on whether a project may have a significant effect on the physical environment (CEQA Guidelines, 15064(d)). The purpose of an environmental impact report is to identify the significant effects on the environment of a project, to identify alternatives to the project, and to indicate the manner in which those significant effects can be mitigated or avoided (Pub. Res. Code, §21002.1 subd. (a)). Environmental justice is not considered an area of impact under CEQA, and CEQA does not ask that a project mitigate preexisting conditions. As noted in CEQA Guidelines Section 15064(b), the significance of an activity may vary with the environmental setting. Where there already is a high pollution burden on a community, the relevant question is whether an additional amount of pollution should be considered significant in light of the serious nature of the existing problem.[10]

The Existing Conditions section in Section IV.B *Air Quality* of the Draft EIR includes ambient air quality data gathered from the local air quality monitoring stations. The average concentrations and days above the standard for each criteria air pollutant are listed in Table IV.B-6 *Summary of 2010-2012 Ambient Air Quality Data in the Proposed Project Vicinity* on page IV.B-11 of the Draft EIR. The Air Quality impact analysis relative to the impacts of the proposed project has been further detailed above in this Response to Comment No. E6-1, and is located in Section IV.B *Air Quality* of the Draft EIR. In the Draft EIR, sensitive receptors are defined on page IV.B-11. There are two maps showing their locations: Figure IV.B-1 *Sensitive Receptors* and Figure IV. B-2 *Receptor Grid and Sensitive Receptors*.

COMMENT NO. E6-2

It is clear that Los Angeles City has failed the residents of South LA by considering a substandard DEIR. In 2008 the City of Los Angeles reviewed a project submitted by Horowitz to do one warehouse that encompassed 437,196 sq. ft. (see Case No. ENV-2008-799-MND, VTT-61482, DIR-2008-841-SPR, aka 41st and Alameda Warehouse Project) and at that time there would be 264 truck trips per day. In the recent DEIR PIMA will be developing 481,022 sq. ft. of warehouse space; comprised of 4 buildings and over 2000 car trips per day. In PIMA's proposal they claim a mere 75 trip trucks a day. There is a difference of 189 truck trips per days for a warehouse space that is 10% larger. There is a difference of 70% in truck trips. What is problematic with this assumption is that all further analysis will be based on the underspecified 75 truck trips per day. While this under estimation of the truck trips may get the project approved by the City; the city under Jan Perry has supported this project, it will have long negative impact on the residents of South Los Angeles. In the realm of Air Quality Health Risk Assessment the truck trips are further down estimated to 31 diesel fueled trucks per day. The Kleinfelder's Health Risk Analysis is faulty because it also assumes a degraded amount of truck trips per day; 75 truck trips per day.

[10] Harris, Kamala D. 10 July 2012. *Environmental Justice at the Local and Regional Level: Legal Background*. Prepared by State of California Department of Justice. Available at: http://oag.ca.gov/sites/all/files/agweb/pdfs/environment/ej_fact_sheet.pdf

RESPONSE NO. E6-2

The City of Los Angeles has noted the concern about the discrepancy in the number of truck trips and the resulting health risks. A total of 351 truck trips is assumed in the Air Quality Health Risk Assessment (Appendix V in Volume IV of the Draft EIR) and Section IV.B, *Air Quality*, of the Draft EIR based on the Addendum to the Traffic Impact Study (Appendix IX in Volume VI of the Draft EIR). Of the 351 truck trips, EMFAC 2011 estimates that on average 9 percent of the total trucks are diesel-fueled trucks for an estimate of 31 diesel-fueled trucks as mentioned in the Human Health Risk Analysis portion of Section IV.B *Air Quality* of the Draft EIR.

The Draft EIR states on page IV.G-13 that

> *It is calculated that the proposed project will generate approximately 1,966 net passenger car equivalent (PCE) trips per average day. The average weekday net new peak hour PCE trips will be approximately 179 trips during the a.m. peak hour and 190 trips during the p.m. peak hours (Figure IV.G-6, Distribution of Project Traffic, and Figure IV.G-7, Existing [2014] plus Project Traffic Volumes). The traffic analysis also considered the distribution of trips during a.m. and p.m. peak hours in the vicinity of the proposed project (Figure IV.G- 8, Project Traffic at Driveways and Adjacent Intersections).*
>
> *While these estimates were developed based on the ITE's Trip Generation Manual, the project applicant has indicated that truck trips associated with operation of the proposed project would not exceed 75 daily truck trips, which has therefore been analyzed as Alternative C in this Draft EIR (see Attachment E to the Initial Study, which is Appendix III of this Draft EIR).*

The 75 truck trips identified in Alternative C stem from the existing operations at various facilities, which will be consolidated in the proposed project. Currently, there is a maximum of 33 truck trips/day total for the various facilities. The proposed project build out is not expected to significantly increase this number of trips; hence, 75 daily truck trips were taken as the assumption in Alternative C of the Draft EIR.

COMMENT NO. E6-3

Regional Air Quality

The air quality in Southern California does not meet the state and federal standards. The American Lung Association consistently gives Los Angeles County failing grades in the amount of ozone and particulate pollution in the air. Although smog levels are impacted by seasons and weather patterns, smog is visible in the air on most days.

RESPONSE NO. E6-3

The City of Los Angeles has noted the comment about poor air quality in the region as defined by the American Lung Association. The American Lung Association gives an "F" rating for ozone, particulate pollution (24-hour), and particulate pollution (annual) for Los Angeles County. In regard to the California Ambient Air Quality Standards, Los Angeles County has also been designated nonattainment for ozone, PM_{10}, $PM_{2.5}$, nitrogen dioxide, and lead. The Draft EIR evaluates the proposed project with respect to the State CEQA Guidelines. Construction and operations emissions were modeled and compared to the South Coast Air Quality Management District (SCAQMD) Significance Thresholds. Only the PM_{10} construction emissions were found to exceed the SCAQMD significance threshold by 5.6 lbs/day. Mitigation measures are described in the Draft EIR on page IV.B-23 and IV.B-24, which reduce air quality impacts below the threshold of significance. All other criteria pollutants are expected to be below the SCAQMD significance

thresholds for both construction and operation phases. The proposed project is expected to be consistent with the regional 2012 Air Quality Management Plan. Please see pages IV.B-16, IV.B-17, and IV.B-19 of the Draft EIR for further information regarding the proposed project's consistency with state and regional air quality plans.

LETTER NO. E7

Michelle Black
Chatten-Brown & Carstens
2200 Pacific Coast Highway Suite 318
Hermosa Beach, CA 90254

COMMENT NO. E7-1

On behalf of Mr. Tezozomoc of the South Central Farmers, we submit these comments on the draft environmental impact report ("DEIR") prepared for the 4051 South Alameda Street Project ("Project" or "warehouse project"). The Project would authorize construction of four massive warehouse buildings containing nearly one-half million square feet of development on 14 acres formerly occupied by the South Central Farm, a mere 150 feet from the nearest residence. Specifically, the warehouse project would contain 365,945 square feet of warehouse space, 85,181 square feet of office space, and 29,896 square feet of manufacturing space, albeit for undisclosed purposes. Notably, the Project would require significant widening of South Alameda Street, Long Beach Avenue, and 41st Street, reducing the streets' safety and utility for neighborhood pedestrians. It would also develop 2.6 acres of the Project site that had been promised as a park after the City's settlement with the former landowner.

The South Central Farmers are comprised of approximately 350 families residing in the community surrounding the Project site. From 1994 to 2006, the South Central Farmers operated the Project site as the South Central Community Garden. At 14 acres, the garden was one of the largest urban community gardens in the United States, growing 100 to 150 different species of fruits, vegetables, herbs. The garden also grew Mesoamerican traditional plants unavailable in local or national markets. The garden served as a focal point for the farmers and their families until the farmers were evicted in 2006. Although the farmers were promised relocation to additional farm sites due to the then-property owner's desire to develop the property, only a portion of the promised acreage has ever been made available, and the Project site has remained vacant. The South Central Farmers now truck in fresh produce grown in Buttonwillow and Lake Hughes, but nothing has been done to alleviate the food desert in their community. The 3-acre soccer field promised by the then-property owner has also never been constructed, leaving the surrounding neighborhood without its beloved community garden and without any other green space to replace this lost community center.

RESPONSE NO. E7-1

The comment addressing the preservation of community character and alleviation of food desert through establishment of a community garden has been noted, and will be taken into consideration by the decision makers prior to taking action on the proposed project.

The applicant acknowledges the former interim use of the project site as a community garden that occurred under previous ownership. However, the use was discontinued in 2006, and the project site is currently vacant underutilized land in an industrially zoned area. Appendix XII and Section III.E of the Draft EIR provide details of a 2003 settlement agreement between the prior owner and the City of Los Angeles to dedicate 2.6 acres of the property for maintenance of a park for recreation and park purposes, and subsequent amendment of the agreement to allow the proposed project to be developed. This amendment for the cash pledge provided the City or a nonprofit organization with the funds to dedicate a park in a more appropriate location than the project site, which is industrially zoned and isolated to the west and east by major rail lines. The City Council accordingly determined that establishment of an active use park on the property is inappropriate due to the property's location in an industrial corridor, and authorized execution of a Cash Pledge Agreement whereby a payment in the amount of $3,573,365 was

made to improve and provide recreational and park facilities at more suitable alternate sites in the vicinity of the property (see Report of the Chief Legislative Analyst, Ordinance No. 181949, and City Council Motion included in Appendix XII of the Draft EIR). The value of the cash pledge was determined on the basis of the pro rata value of the 2.6 acres to be set aside for recreational purposes pursuant to the settlement agreement relative to the overall purchase price of the project site. For further information on the site background and cash pledge agreement for park and recreational uses, please see page IV-11 of Section IV, *Corrections and Additions to the Draft EIR* of this Final EIR, and pages III-6 and III-7 and Appendix XII of the Draft EIR.

As stated in the Draft EIR and summarized above, the project's cash pledge agreement will contribute to open space in the City in a more suitable location, while the project site would be developed consistent with its Community Plan designation, goals and policies, and the project objectives.

In regard to concerns about street widening and pedestrian safety, Page III-1 of the Draft EIR describes the street widening dedications that would be made to the City as part of the proposed project:

- 5' street widening on Martin Luther King, Jr. Blvd.
- 8.5' street widening on the north and 12.5' street widening on the south of South Alameda Street22' street widening on 41st Street

The City Bureau of Engineering process for street dedication allows the City to obtain necessary public street right-of-way from private property owners to meet City standards. Every street in the City of Los Angeles is classified according to its prescribed transportation use. The categories include Major and Secondary Highways, Collector Streets, and various classifications of local and hillside streets. Each type of street has a required right-of-way width, roadway width, and sidewalk width. In order to enforce these requirements, the Bureau of Engineering has the authority to obtain the necessary right-of-way from private property owners when the properties are developed. One of two methods of obtaining the necessary right-of-way occurs through a Highway Dedication clearance on a Department of Building and Safety Building Permit Application (B&S Application). In addition to the right-of-way dedication, the private property owner may be required to make necessary improvements such as roadway widening and installation of curb, gutter, curb ramps, and sidewalk. If the existing public right-of-way is already fully improved, the private property owner is requested to construct additional sidewalk over the newly dedicated property, repair or replace broken and off grade sidewalk, and close unused driveways.

The existing dedicated ROW for the streets surrounding the project site are shown in the table below:

Street Name	Location in Relation to Project Site	Existing ROW ½ Width (dedicated)	Proposed ROW ½ Width
41st Street	South	30 feet	52 feet
Alameda Street	East	23.5 feet	36 feet
East Martin Luther King Junior Boulevard	North	25 feet	30 feet
Long Beach Avenue East	West	70 feet	70 feet

The following table shows the required ROW and street widths for the streets surrounding the project site as described in the existing Southeast Los Angeles Community Plan (SELACP), the proposed update to the SELACP, and the update to the Mobility Element of the City's General Plan (Mobility Plan 2035):

Street Name	Existing SELACP			SELACP Update			Mobility Plan 2035		
	Class.	ROW ½ Width (feet)	Roadway ½ Width (feet)	Class.	ROW ½ Width (feet)	Roadway ½ Width (feet)	Class.	ROW ½ Width (feet)	Roadway ½ Width (feet)
41st Street	Major Hwy Class II	52	40	Collector	32	22	Collector	33	20
Alameda Street	Major Hwy Class II	52	40	Major Street	---	---	Avenue III	36	23
Martin Luther King Blvd.	Local (standard)	30	18	Local (standard)	30	18	Local (standard)	30	18
Long Beach Ave. [11]	Major Hwy Class II	52	40	Collector	32	22	Boulevard I	68	50

The project will comply with applicable street dedications to the satisfaction of the pertinent City agencies including Planning, DOT, and BOE. Additionally, the proposed street dedications will comply with all City street dedication requirements upon reclassification of 41st Street as a collector street.

In addition to the street widening, the proposed project would include a perimeter sidewalk with clearly defined driveways located at breaks in a continuous landscape strip to minimize pedestrian/vehicular conflicts.

The analysis in the Draft EIR, Section IV.B, *Air Quality*, on pages IV.B-11 and IV.B-12, identified 64 sensitive receptors within a 500-foot radius of the proposed project. These are shown in Figure IV.B-1, *Sensitive Receptors*. The nearest sensitive receptor, a duplex residential unit, is located approximately 150 feet west of the proposed project site across Long Beach Avenue. The analysis of potential impacts to sensitive receptors is located in the Draft EIR, Section IV.B, *Air Quality*, on pages IV.B-17 through IV.B-22. The conclusion of the analysis is that the proposed project, with mitigation measures, would result in less than significant air quality impacts to sensitive receptors.

COMMENT NO. E7-2

The South Central Farmers are particularly concerned about the warehouse project's contribution to the region's already poor air quality and the corresponding impacts on community health. While the DEIR purports to have analyzed the Project's likely air emissions and to have performed a health risk assessment, these analyses are based upon an inadequate project description and an underestimation of daily truck trips. The Project will also adversely impact the community by foreclosing the opportunity to develop the Project site into much-needed community green space. These impacts could be reduced or avoided entirely by feasible alternatives to the warehouse project. In particular, the South Central Farmers have for years advocated returning the Project site to use as a community garden. In addition to avoiding the Project's admittedly significant impacts on air quality, cultural resources, transportation and traffic, and utilities and service systems, the community garden or a parks and recreation alternative would alleviate the area's park shortage and provide a focal point for community activities and gatherings, while buffering residences from dense industrial uses located to the east.

RESPONSE NO. E7-2

[11] Long Beach Avenue is designated as a Major Highway II in the existing SELACP and proposed update to the SELACP which requires a dedicated right-of-way width of 104 feet and a roadway width of 80 feet The current dedicated right-of-way width of Long Beach Avenue is 140 feet which includes 60 feet of right-of-way for the Metro Blue Line light rail line. Long Beach Avenue is designated as a Boulevard I in Mobility Plan 2035 which requires a dedicated right-of-way width of 136 feet which includes the 60 feet of Blue Line right-of-way. The currently dedicated right-of-way width of 140 feet complies with the requirements of the existing and proposed SELACP and Mobility Plan 2035.

The comment addressing the land use and potential alternatives has been noted. The project applicant recognizes the need for open space in the community, and a cash pledge was made to support maintenance and improvement of local parks, such that there would be no potential for a net adverse effect on recreation facilities that serve the area in which the project is located. Additionally, all potentially significant impacts from the proposed project will be reduced to below thresholds of significance through mitigation measures with the exception of impact to traffic at Alameda Street and East Washington Boulevard during the PM peak hour (see pages I-7 to I-14 and IV.G-13 of the Draft EIR and pages IV-8, and IV-14 through IV-18 of Section IV, *Corrections and Additions to the Draft EIR* of this Final EIR).

The applicant acknowledges the former interim use of the project site as a community garden that occurred under previous ownership. However, the use was discontinued in 2006, and the project site is currently vacant underutilized land in an industrially zoned area. Appendix XII and Section III.E of the Draft EIR provide details of a 2003 settlement agreement between the prior owner and the City of Los Angeles to dedicate 2.6 acres of the property for maintenance of a park for recreation and park purposes, and subsequent amendment of the agreement to allow the proposed project to be developed. This amendment for the cash pledge provided the City or a nonprofit organization with the funds to dedicate a park in a more appropriate location than the project site, which is industrially zoned and isolated to the west and east by major rail lines. The City Council accordingly determined that establishment of an active use park on the property is inappropriate due to the property's location in an industrial corridor, and authorized execution of a Cash Pledge Agreement whereby a payment in the amount of $3,573,365 was made to improve and provide recreational and park facilities at more suitable alternate sites in the vicinity of the property (see Report of the Chief Legislative Analyst, Ordinance No. 181949, and City Council Motion included in Appendix XII of the Draft EIR). The value of the cash pledge was determined on the basis of the pro rata value of the 2.6 acres to be set aside for recreational purposes pursuant to the settlement agreement relative to the overall purchase price of the project site. For further information on the site background and cash pledge agreement for park and recreational uses, please see pages IV-3 and IV-4 of Section IV, *Corrections and Additions to the Draft EIR* of this Final EIR, and pages III-6 and III-7 and Appendix XII of the Draft EIR.

Section 15126.6 of the CEQA Guidelines requires an EIR to describe a range of reasonable alternatives to a project or to the location of a project that would feasibly attain most of the basic objectives of a project but would avoid or substantially lessen any of the significant effects of a project, and evaluate the comparative merits of the alternatives. The discussion of alternatives, however, need not be exhaustive, but rather the discussion must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. An EIR is not required to consider alternatives that are deemed "infeasible." In developing alternatives, the following factors are considered: (i) ability to meet most of the basic project objectives, (ii) feasibility, or (iii) ability to avoid or substantially lessen significant environmental impacts.

As set forth in Section VI of the Draft EIR on pages VI-3 to VI-4, the Community Garden alternative, requested through public comments, considered development of the project for an alternate land use, specifically a community garden. However, this alternative was withdrawn from consideration as it does not meet the basic project objectives:

- A community garden or park would not attain the objective of providing a minimum of 480,000 square feet of light industrial space, consistent with the existing land use designation and zoning.

- A community garden or park would not provide light manufacturing jobs within 3 miles

of an existing garment manufacturing labor force in the Southeast Los Angeles Community Plan Area.

- A community garden or park would not allow for development of an industrial park that is along the Alameda Corridor to take advantage of distribution efficiency opportunities.

- A community garden or park would not facilitate the ability of existing garment labor force, located in close proximity to the project site to utilize existing public transit system and other multi-modal transportation opportunities in vicinity of proposed project.

- A community garden or park would not preserve and/or redevelop the industrial sector of the Southeast Los Angeles Community Plan Area to accommodate emerging technologies, thus providing an enhanced employment base for the Community Plan Area's population.

- A community garden or park would not benefit the Southeast Los Angeles Community Plan area population as economic stimulation through employment opportunities, attracting commercial and industrial tenants to the area, and providing tax revenue for the City would not occur.

The proposed use of the property as light manufacturing is consistent with land use planning objectives articulated in the Southeast Los Angeles Community Plan. The City of Los Angeles Southeast Los Angeles Community Plan has designated the project site as light industrial. The land use designation discourages nonindustrial uses and uses that compromise job-producing potential. Plan Goal 3 supports sufficient land for a variety of industrial uses with maximum employment opportunities, which are safe for the environment and the work force, and which have minimal adverse impacts on adjacent uses. The South East Los Angeles Community Plan further supports the retention and redevelopment of the industrial sector through Objective 3-1, Policy 3-1.1, and Objective 3-2, Policy 3-2.1:

> **Objective 3-1** To provide for existing and future industrial uses which contribute job opportunities for residents and which minimize environmental and visual impacts to the community.
>
> **Policies 3-1.1** Designate lands for the continuation of existing industry and development of new industrial parks, research and development uses, light manufacturing, and similar uses which provide employment opportunities.
>
> **Objective 3-2** To retain industrial plan designations to maintain the industrial employment base for community residents and to increase it whenever possible.
>
> **Policies 3-2.1** The significant, large industrially planned parcels located in predominantly industrial areas associated with the railroad transportation facilities along Alameda and in the Slauson area should be protected from development by other uses which do not support the industrial base of the community, and the City.

The Southeast Los Angeles Community Plan's open space goals and objectives support the preservation of existing open space and the development of new open space, in balance with new development, to serve the recreational, environmental, health and safety needs of the community. The objectives further note that the "Plan Map designates lands for open spaces including parklands." As noted above, the project site is in an industrial corridor adjacent to the Alameda Corridor rail line, and it is not designated

for open space on the plan map. The area surrounding the proposed project site is developed almost exclusively with light and heavy industrial uses, with limited small lot single family residential homes intermixed with light/industrial warehouse uses to the south and residential areas farther to the west. The Alameda Corridor rail line is located directly to the east and runs below grade in the project area, and also includes the Southern Pacific Railroad right-of-way across South Alameda Street. The Metro Blue Line light rail is located immediately to the west of the project site. The nearest designated open space is the Ross Snyder Recreation Center, located 0.2 mile west of the proposed project.

As stated in the Draft EIR and summarized above, the project's cash pledge agreement will contribute to open space in the City in a more suitable location, while the project site would be developed consistent with its Community Plan designation, goals and policies, and the project objectives.

With respect to potential air quality impacts, the emissions modeling and results of the analysis highlighted in the *Air Quality Health Risk Assessment for the Proposed Alameda Industrial Park* dated September 17, 2014 (Appendix V in Volume IV of the Draft EIR, referred to here as the HRA), demonstrate that the proposed project anticipates 351 truck trips. Alternative C, Reduced Truck Operations, is the environmentally superior alternative and proposes limiting truck trips to 75 per day. The anticipated number of truck trips for Alternative C was derived from empirical data for existing operations, including the maximum foreseeable expansion of operations. As part of the characterization of the baseline conditions, the Addendum to Traffic Impact Study attached as Appendix IX in Volume VI of the Draft EIR documented that there is a maximum of 33 existing trips/day total for the various facilities proposed to be consolidated at the project site. The proposed project build out is not expected to significantly increase this number of trips. However, the maximum probable scenario of 75 daily truck trips was taken as a conservative assumption in Alternative C, as analyzed in the Draft EIR.

The relatively small incremental increase in air quality emissions is able to be mitigated due, among other things, to the following factors:

a. The Addendum to the Traffic Impact Study (October 3, 2014; Appendix IX, Volume VI of the Draft EIR) shows that even at 351 truck trips per day, the level of service at the surrounding intersections is not expected to be significantly impacted with the exception of traffic impacts at the intersection of Alameda Street and East Washington Boulevard. Under Alternative C, the project would not generate traffic at the ITE-recommended rate (i.e., 351 truck trips per day), which is based on surveys conducted nationally at typical warehouse facilities. Under Alternative C, the project would generate no more than 75 truck trips per day, and an analysis with this reduced number of truck trips results in no significant impacts at any of the study intersections. Thus, there will be no meaningful changes to emissions from idle time due to the addition of project truck traffic.

b. The applicant has specified that truck traffic will consist of cargo vans and box trucks only; no large diesel semi-tractor trucks are included in the daily traffic to the site, thus further reducing potentially harmful emissions.

c. The HRA conservatively assumed 351 trucks per day based on the proposed project and not Alternative C, Reduced Truck Operations.

d. Per the approved EMFAC 2011 emissions factor model, the size vehicles anticipated could be either diesel or gasoline powered. EMFAC distributions specific to Los Angeles County show that 9 percent of 351 daily truck trips on average (i.e., 31 trucks per day) are expected to be diesel powered.

e. Per the HRA and assuming 351 truck trips per day, the maximum cancer risk is estimated to be only 3 percent of the allowable threshold of 10 in one million.

f. With Alternative C, Reduced Truck Operations, truck trips would be limited to 75 truck trips per day. As a result, the maximum cancer risks drop to 0.6 percent of the allowable threshold.

Criteria pollutants generated during construction and operation of the proposed project are calculated to be well below acceptable thresholds except with respect to PM_{10} emissions during construction, which can be fully mitigated through implementation of the following mitigation measures:

- Air-1: During the construction phase of the project, the project applicant shall apply soil stabilizers for all unpaved roads (80 percent reduction in $PM_{2.5}$ and PM_{10} emissions).

- Air-2: During the construction phase of the project, the project applicant shall water exposed areas three times a day (61 percent reduction in $PM_{2.5}$ and PM_{10} emissions).

- Air-3: During the construction phase of the project, the project applicant shall ensure that vehicular speeds are reduced to 15 miles per hour on unpaved roads.

Emissions of VOCs will be further reduced below acceptable levels through implementation of the following mitigation measure:

- Air-7: The project applicant shall ensure low VOC paint is applied for interior and exterior uses [250 EF (g/L)].

Construction-related toxic air contaminants (TACs) from diesel particulate emissions will be short-lived (3 months), and therefore do not require a Health Risk Assessment from the Office of Environmental Health Hazard Assessment (OEHHA). Diesel particulate emissions only affect the population on a long-term (70-year) basis for cancer impacts so the impacts of short-term TACs from the construction of the proposed project are considered less than significant and were not quantified as part of the Draft EIR.

For operations of the proposed project, there will be an estimated 31 diesel fueled trucks/day out of a total 351 total truck trips/day under the most conservative scenario. Because the total of 351 is greater than 100 daily truck trips, a refined Health Risk Assessment for operational impacts was conducted that identified sensitive receptors and individual cancer risk (Appendix V in Volume IV of the Draft EIR). The maximum potential cancer risk is 0.3 in a million. This is only 3 percent of the cancer risk threshold of 10 in a million. Therefore, the proposed project would not result in the significant human health risks related to diesel emissions. The alternatives with clean fuel trucks and reduced truck operations would result in even fewer diesel emissions.

Operational emissions generated from mobile sources will be further reduced below acceptable levels through implementation of the following mitigation measures:

Air-4

The project applicant shall establish incentives for increased transit frequency- in compliance with the transportation demand management and trip reduction measures set forth in Section 12.26J of the Los Angeles Municipal Code, which include the following requirements for non-residential projects with more than 100,000 square feet of floor area.

(a) Development in excess of 25,000 square feet of gross floor area. The owner shall provide a bulletin board, display case, or kiosk (displaying transportation information) where the greatest number of employees are likely to see it. The transportation information displayed should include, but is not limited to, the following:

(1) Current routes and schedules for public transit serving the site;

(2) Telephone numbers for referrals on transportation information including numbers for the regional ridesharing agency and local transit operations;

(3) Ridesharing promotion material supplied by commuter-oriented organizations;

(4) Regional/local bicycle route and facility information;

(5) A listing of on-site services or facilities which are available for carpoolers, vanpoolers, bicyclists, and transit riders.

(b) Development in excess of 50,000 square feet of gross floor area. The owner shall comply with Paragraph (a) above and in addition shall provide:

(1) A designated parking area for employee carpools and vanpools as close as practical to the main pedestrian entrance(s) of the building(s). This area shall include at least ten percent of the parking spaces required for the site. The spaces shall be signed and striped sufficient to meet the employee demand for such spaces. The carpool/vanpool parking area shall be identified on the driveway and circulation plan upon application for a building permit;

(2) One permanent, clearly identified (signed and striped) carpool/vanpool parking space for the first 50,000 to 100,000 square feet of gross floor area and one additional permanent, clearly identified (signed and striped) carpool/vanpool parking space for any development over 100,000 square feet of gross floor area;

(3) Parking spaces clearly identified (signed and striped) shall be provided in the designated carpool/vanpool parking area at any time during the building's occupancy sufficient to meet employee demand for such spaces. Absent such demand, parking spaces within the designated carpool/vanpool parking area may be used by other vehicles;

(4) No signed and striped parking spaces for carpool/vanpool parking shall displace any handicapped parking;

(5) A statement that preferential carpool/vanpool spaces are available on-site and a description of the method for obtaining permission to use such spaces shall be included on the required transportation information board;

(6) A minimum vertical clearance of 7 feet 2 inches shall be provided for all parking spaces and accessways used by vanpool vehicles when located within a parking structure;

(7) Bicycle parking shall be provided in conformance with Section 12.21A16 of this Code.

(c) Development in excess of 100,000 square feet of gross floor area. The owner shall comply with Paragraphs (a) and (b) above and shall provide:

(1) A safe and convenient area in which carpool/vanpool vehicles may load and unload passengers other than in their assigned parking area;

(2) Sidewalks or other designated pathways following direct and safe routes from the external pedestrian circulation system to each building in the development;

(3) If determined necessary by the City to mitigate the project impact, bus stop improvements shall be provided. The City will consult with the local bus service providers in determining appropriate improvements. When locating bus stops and/or planning building entrances, entrances shall be designed to provide safe and efficient access to nearby transit stations/stops;

(4) Safe and convenient access from the external circulation system to bicycle parking facilities on-site.

Air-5

The project applicant shall improve the pedestrian network for the project site to internally link all uses and connect with existing or planned external streets and pedestrian facilities contiguous with the project site. The project applicant shall identify street trees and streetscape improvements to connect site access points to nearby transit and bicycle facilities.

Air-6

The project applicant shall provide traffic calming measures through street improvements. The applicant will be dedicating additional right-of-way along 41st Street, Alameda Street, and Martin Luther King, Jr. Boulevard. In connection with the street dedications and development of the proposed project, the applicant will be upgrading existing sidewalks, curb and gutter, as well as street trees, street lighting, and street furniture around the entire perimeter of the property in consultation with the City Department of Transportation and Department of Public Works. Upgrades to the existing sidewalks will require new curb cuts and crosswalks and the replacement of existing traffic signals at intersections. Additional traffic control devices will be installed as necessary and required to facilitate safe traffic circulation in and around the proposed project site.

In addition to the above mitigation measures, emissions generated from mobile sources will be further reduced below acceptable levels as a result of the On-Road Heavy-Duty Diesel Vehicles Regulation Amendments approved by CARB in April 2014. The main objective of this regulation is to reduce emissions from heavy-duty diesel trucks and buses by installing new filters and upgrading engines. The regulation mandates that all new heavy-duty trucks and buses must have particulate matter filters that meet CARB requirements by January 1, 2012. Lighter and older heavy trucks must be replaced starting in January 1, 2015. All trucks and buses are required to have model year 2010 engines or equivalent by January 1, 2023. The scope of the regulation includes both public and private vehicles. This language has been added to Section IV, *Corrections and Additions to the Draft EIR* on Page IV-13.

COMMENT NO. E7-3

The California Environmental Quality Act (CEQA) serves two basic, interrelated functions: ensuring environmental protection and encouraging governmental transparency. (*Citizens of Goleta Valley v. Bd. of Supervisors* (1990) 52 Cal. 3d 553, 564.) CEQA requires full disclosure of a project's significant environmental effects so that decisionmakers and the public are informed of these consequences before the project is approved, to ensure that government officials are held accountable for these consequences.

(*Laurel Heights Improvement Ass'n of San Francisco v. Regents of the University of California* (1988) 47 Cal.3d 376, 392.) The environmental impact report (EIR) process is the "heart of CEQA" and is the chief mechanism to effectuate its statutory purposes. (*In Re Bay-Delta Programmatic EIR Coordinated Proceedings* (2008) 43 Cal. 4th 1143, 1162.) The South Central Farmers are concerned that the DEIR fails to adequately disclose, analyze, and mitigate many of the warehouse project's significant adverse environmental impacts. Also of great concern is the DEIR's failure to adequately and accurately consider feasible alternatives to the Project that would reduce the Project's many significant adverse impacts.

RESPONSE NO. E7-3

Section 15126.6 of the CEQA Guidelines requires an EIR to describe a range of reasonable alternatives to a project or to the location of a project that would feasibly attain most of the basic objectives of a project but would avoid or substantially lessen any of the significant effects of a project, and evaluate the comparative merits of the alternatives. The discussion of alternatives, however, need not be exhaustive, but rather the discussion must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. An EIR is not required to consider alternatives that are deemed "infeasible." In developing alternatives, the following factors are considered: (i) ability to meet most of the basic project objectives, (ii) feasibility, or (iii) ability to avoid or substantially lessen significant environmental impacts.

As set forth in Section VI of the Draft EIR on pages VI-3 to VI-4, the Community Garden alternative, requested through public comments, considered development of the project for an alternate land use, specifically a community garden. However, this alternative was withdrawn from consideration as it does not meet the basic project objectives:

- A community garden or park would not attain the objective of providing a minimum of 480,000 square feet of light industrial space, consistent with the existing land use designation and zoning.

- A community garden or park would not provide light manufacturing jobs within 3 miles of an existing garment manufacturing labor force in the Southeast Los Angeles Community Plan Area.

- A community garden or park would not allow for development of an industrial park that is along the Alameda Corridor to take advantage of distribution efficiency opportunities.

- A community garden or park would not facilitate the ability of existing garment labor force, located in close proximity to the project site to utilize existing public transit system and other multi-modal transportation opportunities in vicinity of proposed project.

- A community garden or park would not preserve and/or redevelop the industrial sector of the Southeast Los Angeles Community Plan Area to accommodate emerging technologies, thus providing an enhanced employment base for the Community Plan Area's population.

- A community garden or park would not benefit the Southeast Los Angeles Community Plan area population as economic stimulation through employment opportunities, attracting commercial and industrial tenants to the area, and providing tax revenue for the City would not occur.

The proposed use of the property as light manufacturing is consistent with land use planning objectives articulated in the Southeast Los Angeles Community Plan. The City of Los Angeles Southeast Los Angeles Community Plan has designated the project site as light industrial. The land use designation discourages nonindustrial uses and uses that compromise job-producing potential. Plan Goal 3 supports sufficient land for a variety of industrial uses with maximum employment opportunities, which are safe for the environment and the work force, and which have minimal adverse impacts on adjacent uses. The South East Los Angeles Community Plan further supports the retention and redevelopment of the industrial sector through Objective 3-1, Policy 3-1.1, and Objective 3-2, Policy 3-2.1:

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The Southeast Los Angeles Community Plan's open space goals and objectives support the preservation of existing open space and the development of new open space, in balance with new development, to serve the recreational, environmental, health and safety needs of the community. The objectives further note that the "Plan Map designates lands for open spaces including parklands." As noted above, the project site is in an industrial corridor adjacent to the Alameda Corridor rail line, and it is not designated for open space on the plan map. The area surrounding the proposed project site is developed almost exclusively with light and heavy industrial uses, with limited small lot single family residential homes intermixed with light/industrial warehouse uses to the south and residential areas farther to the west. The Alameda Corridor rail line is located directly to the east and runs below grade in the project area, and also includes the Southern Pacific Railroad right-of-way across South Alameda Street. The Metro Blue Line light rail is located immediately to the west of the project site. The nearest designated open space is the Ross Snyder Recreation Center, located 0.2 mile west of the proposed project.

The applicant acknowledges the former interim use of the project site as a community garden that occurred under previous ownership. However, the use was discontinued in 2006, and the project site is currently vacant underutilized land in an industrially zoned area. Appendix XII and Section III.E of the Draft EIR provide details of a 2003 settlement agreement between the prior owner and the City of Los Angeles to dedicate 2.6 acres of the property for maintenance of a park for recreation and park purposes, and subsequent amendment of the agreement to allow the proposed project to be developed. This amendment for the cash pledge provided the City or a nonprofit organization with the funds to dedicate a park in a more appropriate location than the project site, which is industrially zoned and isolated to the west and east by major rail lines. The City Council accordingly determined that establishment of an active use park on the property is inappropriate due to the property's location in an industrial corridor, and authorized execution of a Cash Pledge Agreement whereby a payment in the amount of $3,573,365 was made to improve and provide recreational and park facilities at more suitable alternate sites in the vicinity of the property (see Report of the Chief Legislative Analyst, Ordinance No. 181949, and City Council

Motion included in Appendix XII of the Draft EIR). The value of the cash pledge was determined on the basis of the pro rata value of the 2.6 acres to be set aside for recreational purposes pursuant to the settlement agreement relative to the overall purchase price of the project site. For further information on the site background and cash pledge agreement for park and recreational uses, please see pages IV-3 and IV-4 of Section IV, *Corrections and Additions to the Draft EIR* of this Final EIR, and pages III-6 and III-7 and Appendix XII of the Draft EIR.

As stated in the Draft EIR and summarized above, the project's cash pledge agreement will contribute to open space in the City in a more suitable location, while the project site would be developed consistent with its Community Plan designation, goals and policies, and the project objectives.

The proposed project has mitigated all significant impacts to below a level of significance through mitigation measures with the exception of traffic impacts at the intersection of Alameda Street and East Washington Boulevard (see pages I-7 to I-14 and IV.G-13 of the Draft EIR and pages IV-8, and IV-14 through IV-18 of Section IV, *Corrections and Additions to the Draft EIR* of this Final EIR). The alternatives considered are Alternative A, No Project Alternative; Alternative B, Use of Clean Fuel Trucks; and Alternative C, Reduced Truck Operations. These alternatives provide ways to reduce the environmental impact of the proposed project while meeting its basic objectives.

COMMENT NO. E7-4

I. An Inadequate Project Description Prevents a Complete Analysis of the Project's Potentially Significant Environmental Impacts.

CEQA requires an EIR to contain a project description that gives a "general description of the project's technical, economic, and environmental characteristics." (CEQA Guidelines § 15124(c)). It must also "include detail sufficient to enable those who did not participate in its preparation to understand and to consider meaningfully the issues raised by the proposed project." (*Association of Irritated Residents v. County of Madera* (2003) 107 Cal.App.4th 1383, 1390.) Here, the DEIR discloses that the Project would construct four warehouses to be used for garment manufacturing, but it does not specify the aspects of garment manufacturing that would occur. This failure to describe key elements of the Project prevents the public and decisionmakers from fully evaluating the Project's likely impacts and the accuracy of the information presented in the EIR. (*San Joaquin Raptor/Wildlife Rescue Center v. County of Stanislaus* (1994) 27 Cal.App.4th 713, 730-35 [the project description cannot fail to describe key elements of the Project].)

For example, the types of activities occurring in the warehouse will impact the number of workers needed onsite, which will impact the number of shifts, the modes of transportation used by employees, and the Project's likely impacts on traffic and noise. The types of activities will also impact the number of truck trips per day due to deliveries and shipping of finished products, which impact the diesel and other pollutant emissions, which impact the Project's affect on community health. If the warehouses will include dyeing of fabrics, chemicals used in the process and measures for containment and disposal must be disclosed in the DEIR. As none of this information is contained in the DEIR, the DEIR lacks much of the required analysis, and the public and City decisionmakers have been denied the opportunity to fully understand the Project and its likely consequences for the community. "Environmental review derives its vitality from public participation." (*Ocean View Estates Homeowners Ass'n, Inc. v. Montecito Water Dist.* (2004) 116 Cal.App.4th 396, 400.)

RESPONSE NO. E7-4

The EIR project description is consistent with the guidelines provided in Section 15124 of the State

CEQA Guidelines:

- The project is located in an industrial zoned M2 area, under which a variety of industrial and warehouse uses are permitted per LAMC § 12.19. The project description and level of detail concerning the type of industrial use based on the ITE traffic rates for the corresponding land use category is sufficient to be used to evaluate impacts on traffic, noise, and inputs to the air quality model. Additionally the project will have to comply with regulations regarding handling of hazardous materials, as specified in the Draft EIR. The location and boundary are described in Section B of the Project Description. Project address is at 4051 South Alameda Street, consisting of four proposed buildings containing approximately 353,375 square feet of warehouse space, 112,745 square feet of office space, 14,000 square feet of manufacturing space, and 404 surface parking spaces. Heights, size, and parking space allocation for each of the buildings, and a Project Location Map showing the precise boundary of the project, are included as Figure II.A-3 of the Draft EIR. The Project Objectives sought by the proposed project are discussed in Section III.C, *Project Objectives* of the Draft EIR. The underlying goal of the proposed project is to enhance the industrial sector of the Southeast Los Angeles Community Plan Area by enhancing the employment base.

    - A general description of the project's technical and environmental characteristics can be found in Section III.B, *Project Characteristics* of the Draft EIR. This section provides a summary of site-specific recommendations, local hire agreement, and construction scenario and phasing plan. Site ingress and egress locations for construction, emergency evacuation planning, and safety and security issues are described. The intended use of the Draft EIR is discussed in Section I.A, *Introduction*.

Sufficient information has been provided in the project description, including the construction scenario, to allow a detailed analysis of the environmental consequences of the proposed project. The routine use, storage, and transport of hazardous materials was evaluated in Section IV.E, *Hazards and Hazardous Materials*, of the Draft EIR. The routine use and storage of chemicals is regulated pursuant to 42 U.S. Code Section 11021 that requires the facility owner to prepare a list of available Material Safety Data Sheets. The proposed project would be required to comply with all relevant federal, state, and local statutes and regulations.

COMMENT NO. E7-5

II. The EIR Fails to Consider Alternatives to the Project.

A. The EIR Fails to Consider a Reasonable Range of Alternatives.

The City has a duty under CEQA to evaluate a reasonable range of alternatives to the warehouse project, especially in light of its significant acknowledged and unacknowledged adverse impacts. "One of [an EIR's] major functions . . . is to ensure that *all reasonable alternatives* to proposed projects are thoroughly assessed by the responsible official." (*Laurel Heights I, supra*, 47 Cal.3d at 400, quoting *Wildlife Alive v. Chickering* (1976) 18 Cal.3d 190, 197; emphasis in original.) Further, "Under CEQA, the public agency bears the burden of *affirmatively demonstrating* that...the agency's approval of the proposed project *followed meaningful consideration of alternatives* and mitigation measures." (*Mountain Lion Foundation v. Fish and Game Commission* (1997) 16 Cal.4th 105, 134, emphasis added.) Just as the EIR is the "heart of CEQA", the alternatives analysis is the "core of the EIR." (Guidelines, § 15003(a); *Laurel Heights Improvement Assn. v. Regents* (1988) 47 Cal.3d 376, 392; *Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal 3d 553, 564.)

The EIR's alternatives analysis fails to satisfy CEQA's statutory mandate by analyzing no actual alternative to the Project other than the compulsory "no project" alternative. While the DEIR lists three alternatives, these alternatives consist of (A) No Project Alternative, (B) Use of Clean Fuel Trucks, (C) Reduced Truck Operations. None of these alternatives includes an alternative use to the warehouse project or to its location. None of these alternatives address the Project's significant impact on utilities and service systems, or on its contribution to the already-severe air quality along the Alameda Corridor.

The unreasonably narrow range of alternatives likely derives from unreasonably narrow project objectives. Use of unduly narrow project objectives violates CEQA. (*In Re Bay Delta Coordinated Environmental Impact Report Proceedings* (2008) 43 Cal. 4th 1143, 1166 ["a lead agency may not give a project's purpose an artificially narrow definition"].) The project objectives include a requirement of at least 480,000 square feet of light industrial space, location within 3 miles of an existing garment manufacturing labor force in the Southeast Los Angeles Community Plan Area, location along the Alameda Corridor, and provision of enhanced employment opportunities and tax revenue. No information is given about why 480,000 square feet is necessary, or why it must be located in one place, at the expense of a planned 2.6-acre park.

The lead agency must exercise its independent judgment on project objectives, and must not uncritically accept the applicant's objectives. (Pub. Resources Code § 21082.1 (c)(1); *Uphold Our Heritage v. Town of Woodside* (2007) 147 Cal.App.4th 587]; *Preservation Action Council v. City of San Jose* (2006) 141 Cal.App.4th 1336, 1352; *Save Round Valley Alliance v. County of Inyo* (2007) 157 Cal.App.4th 1437, 1460.) The City should take this opportunity to think about what would most benefit this community. The DEIR must be revised to include alternatives to the Project, including alternatives that preserve some of the site's 14 acres as open space, and the community garden and park alternatives. The revised DEIR should also consider alternative locations to the project site for the warehouse project, which could conceivably be located on any industrial zoned land in the area.

RESPONSE NO. E7-5

See Response to Comment No. E7-3 above that addresses the consistency of the consideration of reasonable alternatives, in relation to Section 15126.6(a) of the State CEQA Guidelines.

As specified in Section 15126.6(b) of the State CEQA Guidelines, the purpose of the consideration of alternatives is to identify ways to mitigate or avoid the significant effects that the project may have on the environment and allows for the consideration of alternatives to the "project or location" which are capable of avoiding or substantially lessening any significant effects of the project. The proposed project was specifically located to avail itself of the existing labor pool that resides in close proximity to the proposed project site. The significant impacts of the proposed project are related to traffic trip generation. The proposed project has mitigated all significant impacts to below a level of significance through mitigation measures with the exception of traffic impacts at the intersection of Alameda Street and East Washington Boulevard.

Relocation to an alternative site would not change the trip generation; therefore, the consideration of alternative locations is not an effective means of avoiding or substantially lessening any significant effects of the proposed project. Alternative locations would likely not achieve the project goals and objectives related to minimizing worker travel as by locating the proposed project in close proximity to the existing public transit system and other multimodal transportation alternatives, and would likely increase average vehicle miles travelled per employee. The Draft EIR provides an alternative that would avoid and substantially lessen the effects of the project by limiting the number of daily truck trips and thus meets the requirements of Section 15126.6(b) of the State CEQA Guidelines requiring the consideration alternatives to avoid or substantially lessen the effects of the project.

Consistent with the provisions of Section 15124(b) of the State CEQA Guidelines, the project description included the consideration of six objectives that allowed the City to develop a reasonable range of alternatives to evaluate in the EIR. The objectives are based on the applicant's documented need for additional space to meet their business planning objectives, and site selection and project design consistent with the policies and goals of the adopted City of Los Angeles General Plan and the Southeast Los Angeles Community Plan. The project objectives are as follows:

- Construct a new industrial park that provides a minimum of 480,000 square feet of light industrial space to facilitate garment manufacturing.
- Locate a new industrial park within 3 miles of an existing garment manufacturing labor force in the Southeast Los Angeles Community Plan Area.
- Develop an industrial park that is along the Alameda Corridor to take advantage of distribution efficiency opportunities.
- Provide opportunities for the proposed project's labor force to utilize existing public transit systems and other multi-modal transportation opportunities in the vicinity of the proposed project.
- Preserve and/or redevelop the industrial sector of the Southeast Los Angeles Community Plan Area to accommodate emerging technologies, thus providing an enhanced employment base for the Community Plan Area's population.
- The Southeast Los Angeles Community Plan Area population stands to benefit from the proposed project due to economic stimulation through employment opportunities, attracting commercial and industrial tenants to the area, and providing tax revenue for the City.

The first of the six objectives was based on the applicant's anticipated space requirements to accommodate the anticipated garment manufacturing, consistent with the City of Los Angeles light manufacturing land use designation and Zoning Ordinance. The applicant is currently operating facilities in proximity to the proposed project site and has exceeded the capacity of the existing facility. The requirement for the minimum square feet is based on their documented need for additional space. The second and fifth objectives are consistent with the adopted goals and objectives of the Southeast Los Angeles Community Plan Area to encourage the provision of jobs in proximity to labor resources and to preserve or redevelop industrial land uses in the plan area, as discussed in Section IV.F, *Land Use* section of the Draft EIR (see page IV.F-4). The third and fourth objectives are consistent with the adopted goals and objectives of the Transportation Element of the City of Los Angeles General Plan and the Southeast Los Angeles Community Plan which encourage development in conjunction with existing infrastructure and use of the transit system to move people and goods, as discussed in Section IV.G, *Transportation/Traffic* section of the Draft EIR (see pages IV.G-3 and -4). The sixth and final objective was also crafted in alignment with the Southeast Los Angeles Community Plan to promote economic stimulation in the plan area through employment opportunities and tax revenue from the industrial land uses.

COMMENT NO. E7-6

B. The EIR Rejects and Fails to Analyze Feasible Park and Community Garden Alternatives.

In order to achieve CEQA's substantive mandate to avoid or reduce adverse environmental impacts, *potentially* feasible alternatives must be analyzed so that the decisionmaking process regarding feasibility can be subject to public review. "If an alternative is identified as at least potentially feasible, an in-depth discussion is required." (*Save Round Valley Alliance v. County of Inyo* (2007) 157 Cal. App. 4th 1437, 1457.)

CEQA imposes a high standard for the rejection of alternatives. A reasonable alternative may only be eliminated from consideration in the EIR if the alternative would not meet most of the basic project objectives, is infeasible, or would not reduce significant environmental impacts. (Guidelines § 15126.6(c); *Save Round Valley Alliance v. County of Inyo* (2007) 157 Cal.App.4th 1437, 1457.) An alternative is considered feasible if it is "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and technological factors." (Public Resources Code § 21061.1.) Such alternatives must be discussed "even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly." (Guidelines § 15126.6(b).) A project need only feasibly attain "most" of the project objectives, not all of them, to require analysis. (CEQA Guidelines §15126.6(a)(f).)

The South Central Farmers, National Resources Defense Council ("NRDC"), Center for Biological Diversity, and other community advocates have proposed several feasible alternatives aimed at increasing community resiliency and quality of life that would reduce or entirely avoid the Project's significant adverse impacts on air quality, traffic and transportation, and utilities and service systems. An in-depth discussion of these alternatives was required in the EIR, but not provided. (*Save Round Valley, supra*, 157 Cal.App.4th 1457; see 3 AR 1066-1192.)

Based on inapplicable limitations, the DEIR asserts that an alternative reinstituting the community garden alternative is infeasible because it would not comply with applicable zoning. (DEIR, p. VI-3.) The Light Industrial Zone applicable to the project site allows for agricultural uses by right. (Los Angeles Municipal Code, Chapter 1, Article 2, Section 12.19 ("M2" LIGHT INDUSTRIAL ZONE) [M2 Zone allows "[a]ny open lot use permitted in an 'A' or 'R' Zone, which does not involve the use of buildings or structures other than accessory buildings incident to the use of the land."]; see also DEIR, p. I-5; DEIR, p. II-3.) Further, a community garden alternative would bring economic benefit and community value. Before their removal, 350 families farmed the project site, which produced large amounts of both healthy and economically beneficial produce not otherwise available in the community. The farmers were invested in the community, and thousands of people benefited. Urban parks and gardens are economically beneficial to those located outside of the immediate community, as well. According to the Trust for Public Land (TPL), Long Island's parks provide $2.74 billion in annual economic benefits. (See, http://www.tpl.org/nassau-and-suffolk-counties-park-benefit-report.) These benefits include health benefits of $164 million per year due to the use of parks for outdoor exercise, a one-time property value increase of $5.8 billion due to proximity to open space, benefits due to water filtration, and $288 million in benefits due to the area's thriving agriculture industry. (*Ibid.*) Specifically, TPL's report cited local visits to strawberry fields in the spring and pumpkin patches in the fall, each of which are possible if a community garden alternative is implemented. These benefits will greatly exceed those brought to the community by the creation of low-wage jobs in the warehouse project. The DEIR's analysis also fails to account for grant funding and the assistance of foundations if a community garden alternative were implemented. Such funding and assistance has been offered to maintain a community garden on this site in the past.

RESPONSE NO. E7-6

The City acknowledges the economic benefits that urban parks provide on Long Island and the availability of grant funding assistance for community gardens. Section 15126.6 of the CEQA Guidelines

requires an EIR to describe a range of reasonable alternatives to a project or to the location of a project that would feasibly attain most of the basic objectives of a project but would avoid or substantially lessen any of the significant effects of a project, and evaluate the comparative merits of the alternatives. The discussion of alternatives, however, need not be exhaustive, but rather the discussion must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. An EIR is not required to consider alternatives that are deemed "infeasible." In developing alternatives, the following factors are considered: (i) ability to meet most of the basic project objectives, (ii) feasibility, or (iii) ability to avoid or substantially lessen significant environmental impacts.

As set forth in Section VI of the Draft EIR on pages VI-3 to VI-4, the Community Garden alternative, requested through public comments, considered development of the project for an alternate land use, specifically a community garden. The City acknowledges that the M2 zone allows "Open Lot" uses permitted in an A or R zone. However, the Community Garden alternative does not meet the basic project objectives:

- A community garden or park would not attain the objective of providing a minimum of 480,000 square feet of light industrial space, consistent with the existing land use designation and zoning.

- A community garden or park would not provide light manufacturing jobs within 3 miles of an existing garment manufacturing labor force in the Southeast Los Angeles Community Plan Area.

- A community garden or park would not allow for development of an industrial park that is along the Alameda Corridor to take advantage of distribution efficiency opportunities.

- A community garden or park would not facilitate the ability of existing garment labor force, located in close proximity to the project site to utilize existing public transit system and other multi-modal transportation opportunities in vicinity of proposed project.

- A community garden or park would not preserve and/or redevelop the industrial sector of the Southeast Los Angeles Community Plan Area to accommodate emerging technologies, thus providing an enhanced employment base for the Community Plan Area's population.

- A community garden or park would not benefit the Southeast Los Angeles Community Plan area population as economic stimulation through employment opportunities, attracting commercial and industrial tenants to the area, and providing tax revenue for the City would not occur.

The proposed use of the property as light manufacturing is consistent with land use planning objectives articulated in the Southeast Los Angeles Community Plan. The City of Los Angeles Southeast Los Angeles Community Plan has designated the project site as light industrial. The land use designation discourages nonindustrial uses and uses that compromise job-producing potential. Plan Goal 3 supports sufficient land for a variety of industrial uses with maximum employment opportunities, which are safe for the environment and the work force, and which have minimal adverse impacts on adjacent uses. The South East Los Angeles Community Plan further supports the retention and redevelopment of the industrial sector through Objective 3-1, Policy 3-1.1, and Objective 3-2, Policy 3-2.1:

Objective 3-1 To provide for existing and future industrial uses which contribute job

opportunities for residents and which minimize environmental and visual impacts to the community.

Policies 3-1.1 Designate lands for the continuation of existing industry and development of new industrial parks, research and development uses, light manufacturing, and similar uses which provide employment opportunities.

Objective 3-2 To retain industrial plan designations to maintain the industrial employment base for community residents and to increase it whenever possible.

Policies 3-2.1 The significant, large industrially planned parcels located in predominantly industrial areas associated with the railroad transportation facilities along Alameda and in the Slauson area should be protected from development by other uses which do not support the industrial base of the community, and the City.

The Southeast Los Angeles Community Plan's open space goals and objectives support the preservation of existing open space and the development of new open space, in balance with new development, to serve the recreational, environmental, health and safety needs of the community. The objectives further note that the "Plan Map designates lands for open spaces including parklands." As noted above, the project site is in an industrial corridor adjacent to the Alameda Corridor rail line, and it is not designated for open space on the plan map. The area surrounding the proposed project site is developed almost exclusively with light and heavy industrial uses, with limited small lot single family residential homes intermixed with light/industrial warehouse uses to the south and residential areas farther to the west. The Alameda Corridor rail line is located directly to the east and runs below grade in the project area, and also includes the Southern Pacific Railroad right-of-way across South Alameda Street. The Metro Blue Line light rail is located immediately to the west of the project site. The nearest designated open space is the Ross Snyder Recreation Center, located 0.2 mile west of the proposed project site.

The applicant acknowledges the former interim use of the project site as a community garden that occurred under previous ownership. However, the use was discontinued in 2006, and the project site is currently vacant underutilized land in an industrially zoned area. Appendix XII and Section III.E of the Draft EIR provide details of a 2003 settlement agreement between the prior owner and the City of Los Angeles to dedicate 2.6 acres of the property for maintenance of a park for recreation and park purposes, and subsequent amendment of the agreement to allow the proposed project to be developed. This amendment for the cash pledge provided the City or a nonprofit organization with the funds to dedicate a park in a more appropriate location than the project site, which is industrially zoned and isolated to the west and east by major rail lines. The City Council accordingly determined that establishment of an active use park on the property is inappropriate due to the property's location in an industrial corridor, and authorized execution of a Cash Pledge Agreement whereby a payment in the amount of $3,573,365 was made to improve and provide recreational and park facilities at more suitable alternate sites in the vicinity of the property (see Report of the Chief Legislative Analyst, Ordinance No. 181949, and City Council Motion included in Appendix XII of the Draft EIR). The value of the cash pledge was determined on the basis of the pro rata value of the 2.6 acres to be set aside for recreational purposes pursuant to the settlement agreement relative to the overall purchase price of the project site. For further information on the site background and cash pledge agreement for park and recreational uses, please see pages IV-3 and IV-4 of Section IV, *Corrections and Additions to the Draft EIR* of this Final EIR, and pages III-6 and III-7 and Appendix XII of the Draft EIR.

As stated in the Draft EIR and summarized above, the project's cash pledge agreement will contribute to open space in the City in a more suitable location, while the project site would be developed consistent with its Community Plan designation, goals and policies, and the project objectives.

COMMENT NO. E7-7

Although suggested during NOP comments and completely feasible, the DEIR improperly omits the park or recreation alternative from complete analysis. Only half of Los Angeles residents live within walking distance of a park. (2014 City Park Facts, Trust for Public Land, p. 12, available at http://www.tpl.org/sites/default/files/files_upload/2014_CityParkFacts.pdf .) Children have even less park access than the typical Angeleno. For example, Los Angles has only one park playground per 1,000 residents, falling near the bottom of over 100 cities surveyed by the Trust for Public Land in 2014. (2014 City Park Facts, Trust for Public Land, p. 13, available at http://www.tpl.org/sites/default/files/files_upload/2014_CityParkFacts.pdf.) Within the City, the project site's council district has the least park acreage per child of any district in Los Angeles. (See http://www.environment.ucla.edu/reportcard/article1455.html.)

This lack of park access has disastrous results for society and public health. In park-poor neighborhoods, children play in streets, alleyways, or vacant lots instead of on grassy meadows or soccer fields, if they go outside at all. The Trust for Public Land considers this "a national crisis of inactivity that has contributed to higher rates of obesity, diabetes, asthma, anxiety, and depression." (See, TPL website at http://www.tpl.org/our-work/parks-for-people.) Research suggests that parks promote public health and revitalize local economies while connecting people and communities. For these reasons, the Southeast Los Angeles Community Plan, within which the project site is located, highlights the need for additional open space in the community. (DEIR, at p. IV.A-11.) The DEIR fails to show why the warehouse project could not be financially and physically feasible if constructed on 11.4 acres of the project site, which would allow the designation of 2.6 acres of the project site as a much need community park. This alternative should be combined with analysis of an off-site alternative and analyzed in a recirculated DEIR.

RESPONSE NO. E7-7

The comment addressing concerns about public health and park access in park-poor neighborhoods has been noted. The project applicant recognizes the need for open space in the community, and a cash pledge was made in lieu of the dedication of the 2.6 acres pledged pursuant to the 2003 settlement agreement regarding the Lancer Property, to support maintenance and improvement of local parks, such that there would be no potential for a net adverse effect on recreation facilities that serve the area in which the project is located.

Pursuant to the 2003 settlement agreement regarding the Lancer Property, Libaw-Horowitz pledged to dedicate approximately 2.6 acres of the property back to the City of Los Angeles Department of Recreation and Parks or to a nonprofit community organization that would use and maintain the property for recreation and settlement purposes. The sale of the Lancer Property included the pledged 2.6 acres. The amendment of the pledge agreement to substitute a cash pledge for the dedication of the 2.6 acres allows for the proposed industrial park to be developed and provides the City with the funds to dedicate a park in a more appropriate location than the proposed project site, which is industrially zoned and isolated to the east and west by major rail lines. The City Council accordingly authorized execution of a Cash Pledge Agreement whereby a payment in the amount of $3,573,365 was made to improve and provide recreational and park facilities in the vicinity of the property (see Report of the Chief Legislative Analyst, Ordinance No. 181949, and City Council Motion included in Appendix XII of the Draft EIR). The value of the cash pledge was determined on the basis of the pro rata value of the 2.6 acres to be set aside for recreational purposes pursuant to the settlement agreement relative to the overall purchase price of the project site.

Section 15126.6 of the CEQA Guidelines requires an EIR to describe a range of reasonable alternatives to a project or to the location of a project that would feasibly attain most of the basic objectives of a project but would avoid or substantially lessen any of the significant effects of a project, and evaluate the comparative merits of the alternatives. The discussion of alternatives, however, need not be exhaustive, but rather the discussion must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. An EIR is not required to consider alternatives that are deemed "infeasible." In developing alternatives, the following factors are considered: (i) ability to meet most of the basic project objectives, (ii) feasibility, or (iii) ability to avoid or substantially lessen significant environmental impacts.

As set forth in Section VI of the Draft EIR on pages VI-3 to VI-4, the Community Garden alternative, requested through public comments, considered development of the project for an alternate land use, specifically a community garden. However, as further detailed in Response to Comment Nos. E7-1, E7-2, E7-3, E7-5, and E7-6, above, this alternative was withdrawn from consideration as it does not meet the basic project objectives. The proposed use of the property as light manufacturing is consistent with land use planning objectives articulated in the Southeast Los Angeles Community Plan. As stated in the Draft EIR and summarized above, the project's cash pledge agreement will contribute to open space in the City in a more suitable location, while the project site would be developed consistent with its Community Plan designation, goals and policies, and the project objectives.

COMMENT NO. E7-8

III. The Project's Mitigation Measures are Impermissibly Vague.

CEQA requires that a project not be approved when there are significant adverse impacts if there are feasible alternatives or mitigation measures that can reduce those impacts. (Publ. Resources Code § 21002; 21002.1(b); CEQA Guidelines Sections 15091(a); 15092(b).) As the DEIR failed to analyze any true alternatives to the Project that would avoid or reduce its disclosed and undisclosed significant impacts, the EIR was required to incorporate mitigation measures. (Pub. Resources Code § 21002.2; Guidelines § 15126.4.)

Specifically, the CEQA Guidelines require any mitigation measure to be "fully enforceable through permit conditions, agreements, or other legally-binding instruments." (CEQA Guidelines § 15126.4(a)(2);(CEQA Guidelines § 15097; see also *Lincoln Place Tenants Ass'n v. City of Los Angeles* (2005) 130 Cal.App.4th 1491, 1508 ["Mitigating conditions are not mere expressions of hope."]).) Unfortunately, many of the mitigation measures included in the warehouse project are vague and unenforceable or do not require the most effective mitigation measures feasible to reduce adverse impacts.

For example, mitigation measure Air-4, states that the developer "shall establish incentives for increased transit frequency", but no description is given of what incentives will be given and who they will be offered to. As a result, it is impossible for decisionmakers and the public to evaluate whether this proposed mitigation measure will be effective. Without the incorporation of performance standards, it is also impossible for the City or the community to determine if the developer has complied with the measures. Mitigation measure Air-6 is similarly vague, reading that the developer "shall provide traffic calming measures through street improvements," but these street improvements are never disclosed. In addition to preventing the public and decisionmakers from evaluating the effectiveness of this measure, the failure to provide sufficient information prevents the City from evaluating whether the street calming measures will actually reduce traffic impacts or if they will result in unintended adverse impacts.

Mitigation measure Traffic-3 would reclassify 41st street as a "Collector Street" and requires its widening

by 22 feet. However, 41st street west of the Project site is surrounded by residences and passes through a recreation center. Would this conversion to a collector street be accompanied by higher speeds? If so, the DEIR must evaluate the safety and desirability of such a change to this neighborhood.

Other mitigation measures are impermissibly deferred and this too violates CEQA. (*Endangered Habitats League v County of Orange* (2005) 131 Cal. App. 4th 777, 793-94; Guidelines Section 15126.4(a)(1)(B).) CEQA requires all mitigation measures for a project to be formulated during the environmental review process so their efficacy can be analyzed in the EIR. (*San Joaquin Raptor Rescue Center v. County of Merced* (2007) 149 Cal.App.4th 645, 669-670.) Courts have prohibited the deferral of mitigation measures because "[t]here cannot be meaningful scrutiny [of an environmental review document] when the mitigation measures are not set forth at the time of project approval." (*Oro Fino Gold Mining Corp. v. County of El Dorado* (1990) 225 Cal.App.3d 872, 884.) Deferral of the development of mitigation is only allowable where "specific performance criteria" are required at the "time of project approval." (*Sacramento Old City Association v. City Council of Sacramento* (1991) 229 Cal.App.3d 1011, 1029.)

Mitigation measure Utilities and Service Systems-1 requires the applicant to either "have further sewer system gauging obtained to identify specific sewer connection point based on the capacity of the public sewer or build sewer lines to a point in the system with sufficient capacity." As this mitigation measure makes it clear that the necessary analysis has not yet been conducted, the DEIR proposes impermissibly deferred mitigation. The sewer gauging should be done prior to project approval so that the EIR may mitigate the potential impacts of constructing new sewer lines. At the very least, construction of new sewer lines requires ground disturbance and often impacts roads such that they must be closed during construction of sewer lines and afterward for repair. CEQA requires these impacts to be disclosed now.

RESPONSE NO. E7-8

CEQA Guidelines §15126.4(a) requires lead agencies to consider feasible mitigation measures to avoid or substantially reduce a project's significant environmental impacts. The mitigation measures listed in the Draft EIR are in accordance with the CEQA Air Quality Handbook, written in 1993, as prepared by SCAQMD.

Emissions of criteria pollutants generated during construction and operation of the proposed project are calculated to be well below acceptable thresholds except with respect to PM_{10} emissions during construction, which can be fully mitigated through implementation of the following mitigation measures:

- Air-1: During the construction phase of the project, the project applicant shall apply soil stabilizers for all unpaved roads (80 percent reduction in $PM_{2.5}$ and PM_{10} emissions).

- Air-2: During the construction phase of the project, the project applicant shall water exposed areas three times a day (61 percent reduction in $PM_{2.5}$ and PM_{10} emissions).

- Air-3: During the construction phase of the project, the project applicant shall ensure that vehicular speeds are reduced to 15 miles per hour on unpaved roads.

Emissions of VOCs during construction will be further reduced below acceptable levels through implementation of the following mitigation measure:

- Air-7: The project applicant shall ensure low VOC paint is applied for interior and exterior uses [250 EF (g/L)].

Because the Draft EIR demonstrates that there are no significant adverse impacts on air quality during operation of the proposed project, the adoption of measures necessary to mitigate such impacts is not required. The Draft EIR nevertheless proposes Mitigation Measures Air-4 and Air-6 to further reduce potential emissions of criteria air pollutants. Mitigation Measure Air-4 is:

Air-4

The project applicant shall establish incentives for increased transit frequency~~.~~ in compliance with the transportation demand management and trip reduction measures set forth in Section 12.26J of the Los Angeles Municipal Code, which include the following requirements for non-residential projects with more than 100,000 square feet of floor area.

(a) Development in excess of 25,000 square feet of gross floor area. The owner shall provide a bulletin board, display case, or kiosk (displaying transportation information) where the greatest number of employees are likely to see it. The transportation information displayed should include, but is not limited to, the following:

(1) Current routes and schedules for public transit serving the site;

(2) Telephone numbers for referrals on transportation information including numbers for the regional ridesharing agency and local transit operations;

(3) Ridesharing promotion material supplied by commuter-oriented organizations;

(4) Regional/local bicycle route and facility information;

(5) A listing of on-site services or facilities which are available for carpoolers, vanpoolers, bicyclists, and transit riders.

(b) Development in excess of 50,000 square feet of gross floor area. The owner shall comply with Paragraph (a) above and in addition shall provide:

(1) A designated parking area for employee carpools and vanpools as close as practical to the main pedestrian entrance(s) of the building(s). This area shall include at least ten percent of the parking spaces required for the site. The spaces shall be signed and striped sufficient to meet the employee demand for such spaces. The carpool/vanpool parking area shall be identified on the driveway and circulation plan upon application for a building permit;

(2) One permanent, clearly identified (signed and striped) carpool/vanpool parking space for the first 50,000 to 100,000 square feet of gross floor area and one additional permanent, clearly identified (signed and striped) carpool/vanpool parking space for any development over 100,000 square feet of gross floor area;

(3) Parking spaces clearly identified (signed and striped) shall be provided in the designated carpool/vanpool parking area at any time during the building's occupancy sufficient to meet employee demand for such spaces. Absent such demand, parking spaces within the designated carpool/vanpool parking area may be used by other vehicles;

(4) No signed and striped parking spaces for carpool/vanpool parking shall displace any handicapped parking;

(5) A statement that preferential carpool/vanpool spaces are available on-site and a description of the method for obtaining permission to use such spaces shall be included on the required transportation information board;

(6) A minimum vertical clearance of 7 feet 2 inches shall be provided for all parking spaces and accessways used by vanpool vehicles when located within a parking structure;

(7) Bicycle parking shall be provided in conformance with Section 12.21A16 of this Code.

(c) Development in excess of 100,000 square feet of gross floor area. The owner shall comply with Paragraphs (a) and (b) above and shall provide:

(1) A safe and convenient area in which carpool/vanpool vehicles may load and unload passengers other than in their assigned parking area;

(2) Sidewalks or other designated pathways following direct and safe routes from the external pedestrian circulation system to each building in the development;

(3) If determined necessary by the City to mitigate the project impact, bus stop improvements shall be provided. The City will consult with the local bus service providers in determining appropriate improvements. When locating bus stops and/or planning building entrances, entrances shall be designed to provide safe and efficient access to nearby transit stations/stops;

(4) Safe and convenient access from the external circulation system to bicycle parking facilities on-site.

In addition, the proposed project would hire a minimum of 10 percent of its workforce from residents living within one mile of the proposed project site, assuming that there is a demand for local hires and approximately 10% of employees would be locally available. The project is expected to generate a localized demand for transportation in the immediate surrounding area. The Addendum to the Traffic Impact Study (Appendix IX in Volume VI of the Draft EIR) anticipates that those locally employed will not use their vehicles, but rather will use public transit or active transportation methods. Figure IV.G-4, *Public Transportation* in the Draft EIR, demonstrates the proximity of the DASH Bus Stops and Metro Blue Line service relative to the proposed project site. As a result, the requirement for local employment is likely to increase transit use.

Mitigation Measure Air-6 is:

Air-6

The project applicant shall provide traffic calming measures through street improvements. The applicant will be dedicating additional right-of-way along 41st Street, Alameda Street, and Martin Luther King, Jr. Boulevard. In connection with the street dedications and development of the proposed project, the applicant will be upgrading existing sidewalks, curb and gutter, as well as street trees, street lighting, and street furniture around the entire perimeter of the property in consultation with the City Department of Transportation and Department of Public Works. Upgrades to the existing sidewalks will require new curb cuts and crosswalks and the replacement of existing traffic signals at intersections. Additional traffic control devices will be installed as necessary and required to facilitate safe traffic circulation in and around the proposed project site.

Traffic calming measures help reduce traffic and balance it with other forms of active transportation on the street. The project applicant also has a local hire agreement to shift employees' mode of transport from personal vehicles to local transit use, carpooling, biking or walking. Potential street improvements could include crosswalks, sidewalks, street lighting, curb modifications, street parking, and efforts to improve vehicular circulation. The proposed project will also be required to comply with the transportation demand management and trip reduction measures set forth in Section 12.26J of the Los Angeles Municipal Code, which include the following requirements for non-residential projects with more than 100,000 square feet of floor area. These specific TDM measures have been incorporated into Measure Air-4 on page IV-4 of Section IV, *Corrections and Additions to the Draft EIR*.

(a) Development in excess of 25,000 square feet of gross floor area. The owner shall provide a bulletin board, display case, or kiosk (displaying transportation information) where the greatest number of employees are likely to see it. The transportation information displayed should include, but is not limited to, the following:

(1) Current routes and schedules for public transit serving the site;

(2) Telephone numbers for referrals on transportation information including numbers for the regional ridesharing agency and local transit operations;

(3) Ridesharing promotion material supplied by commuter-oriented organizations;

(4) Regional/local bicycle route and facility information;

(5) A listing of on-site services or facilities which are available for carpoolers, vanpoolers, bicyclists, and transit riders.

(b) Development in excess of 50,000 square feet of gross floor area. The owner shall comply with Paragraph (a) above and in addition shall provide:

(1) A designated parking area for employee carpools and vanpools as close as practical to the main pedestrian entrance(s) of the building(s). This area shall include at least ten percent of the parking spaces required for the site. The spaces shall be signed and striped sufficient to meet the employee demand for such spaces. The carpool/vanpool parking area shall be identified on the driveway and circulation plan upon application for a building permit;

(2) One permanent, clearly identified (signed and striped) carpool/vanpool parking space for the first 50,000 to 100,000 square feet of gross floor area and one additional permanent, clearly identified (signed and striped) carpool/vanpool parking space for any development over 100,000 square feet of gross floor area;

(3) Parking spaces clearly identified (signed and striped) shall be provided in the designated carpool/vanpool parking area at any time during the building's occupancy sufficient to meet employee demand for such spaces. Absent such demand, parking spaces within the designated carpool/vanpool parking area may be used by other vehicles;

(4) No signed and striped parking spaces for carpool/vanpool parking shall displace any handicapped parking;

(5) A statement that preferential carpool/vanpool spaces are available on-site and a description

of the method for obtaining permission to use such spaces shall be included on the required transportation information board;

(6) A minimum vertical clearance of 7 feet 2 inches shall be provided for all parking spaces and accessways used by vanpool vehicles when located within a parking structure;

(7) Bicycle parking shall be provided in conformance with Section 12.21A16 of this Code.

(c) Development in excess of 100,000 square feet of gross floor area. The owner shall comply with Paragraphs (a) and (b) above and shall provide:

(1) A safe and convenient area in which carpool/vanpool vehicles may load and unload passengers other than in their assigned parking area;

(2) Sidewalks or other designated pathways following direct and safe routes from the external pedestrian circulation system to each building in the development;

(3) If determined necessary by the City to mitigate the project impact, bus stop improvements shall be provided. The City will consult with the local bus service providers in determining appropriate improvements. When locating bus stops and/or planning building entrances, entrances shall be designed to provide safe and efficient access to nearby transit stations/stops;

(4) Safe and convenient access from the external circulation system to bicycle parking facilities on-site.

As proposed, the current number of project related trips do not exceed the thresholds from Metro's Congestion Management Program (CMP). It should also be noted that all study intersections are expected to operate at an acceptable level of service, with the exception of traffic impacts at the intersection of Alameda Street and East Washington Boulevard. Alternative C, which would limit truck trips to 75 daily for the proposed project would not result in significant traffic impacts at the intersection of Alameda Street and East Washington Boulevard. Off-site traffic impacts as analyzed by an increase in V/C ratio is not considered significant for the proposed project.

Mitigation Measure Traffic-3 is, "41st Street shall be reclassified to a Collector Street. A Collector Street requires a 22-foot half-width roadway within a 32-foot half-width right-of-way." 41st Street will be classified as a collector street (with 44 feet roadway width and 64 feet right-of-way width) per recommendation of the City's Southeast Los Angeles Community Plan. This condition has been required by the DOT as stated in its approval letter dated October 4, 2013 (Appendix XI of the Draft EIR). Therefore, the project is required to dedicate land along its 41st Street frontage so that 41st Street is upgraded to a collector street width standard between Alameda Street and Long Beach Avenue. Because the street width west of Long Beach Avenue cannot be upgraded to new collector street standard under current conditions, there is no reason to have an increased speed limit on 41st Street, and existing safety features of the street will continue to be maintained.

To address Mitigation Measure Utilities and Service Systems-1, the City of Los Angeles Bureau of Engineering has requested additional gauging to support the sizing and location of sewer connections. However, the Draft EIR has already made a determination that the storm water and sewer capacity would be adequate, and therefore there would be no significant impact. Therefore, the City's actions provide an additional check that is part of standard City review processes, and should not be considered deferred mitigation.

COMMENT NO. E7-9

IV. The Greenhouse Gas Analysis and Mitigation is Inadequate.

Based on the unsupportable conclusion that the Project will not generate significant greenhouse gas ("GHG") emissions, the DEIR fails to incorporate any mitigation measures for greenhouse gases. (DEIR p. I-12.) Given that the Project would construct nearly one-half million square feet of building space from raw materials, that it would require the use of electricity to operate, and that it would depend on trucks for the delivery of raw materials and the shipment of finished goods, this conclusion lacks substantial evidence. The DEIR must be revised to analyze the GHG emission that would be generated by the Project and to include specific and enforceable mitigation measures to reduce those emissions. We hereby incorporate the comments submitted by the Center for Biological Diversity on the 2008 project proposed for this site.

RESPONSE NO. E7-9

Your comment regarding greenhouse gas emissions and mitigation measures has been noted. The emissions modeling was conducted in CalEEMod2013.2.2, which is a statewide model, accepted by SCAQMD, to calculate air quality and GHG emissions in land use projects. Based on emissions modeling, unmitigated construction emissions equal approximately 643.22 metric tons of CO_{2e}. Operational emissions equal approximately 2,090.25 metric tons of CO_{2e} per year. The operational GHG emissions can be attributed to mobile sources associated with the proposed project's approximate 353,375 square feet of warehouse space. In the absence of regional thresholds adopted for GHG emissions, the California Air Resources Board (CARB) has suggested a threshold of 25,000 metric tons of CO_{2e} per year was utilized for the quantitative analysis of GHG emissions. Additionally, based on the suggested thresholds proposed by the California Air Pollution Control Officers Association (CAPCOA), the proposed project would be expected to have the potential to result in significant impacts related to global climate change if the proposed project emits more than 25,000 metric tons of CO_{2e} per year. Because the proposed project's construction and operational emissions are not expected to exceed the CARB recommended threshold of 25,000 metric tons of CO_{2e} per year, mitigation measures are not required. The GHG impact analysis can be found in Section IV.D in the Draft EIR. Compliance with the following mandatory measures in the Los Angeles Green Building Code will further reduce the project's direct GHG emissions below acceptable levels:

- 99.05.106.5.3.1. Electric Vehicle Supply Wiring. Provide a minimum number of 208/240 V 40 amp, ground AC outlet(s), that is equal to 5 percent of the total number of parking spaces, rounded up to the next whole number. The outlet(s) shall be located in the parking area.

- 99.05.203.1.3. Energy Efficiency. Exceed California Energy Code requirements, based on the 2008 Energy Efficiency Standards, by 15 percent.

- 99.05.210.1. ENERGY STAR Equipment and Appliances. Residential grade equipment and appliances provided and installed shall be ENERGY STAR labeled if ENERGY STAR is applicable to the equipment or appliance.

- 99.05.211.4. Prewiring for Future Electrical Solar System. Install conduit from building roof, eave, or other locations approved by the Department to the electrical service equipment. The conduit shall be labeled as per the Los Angeles Fire Department

requirements.

- 99.05.303.2. Twenty Percent Savings. A schedule of plumbing fixtures and fixture fittings that will reduce the overall use of potable water within the building by 20 percent shall be provided. The reduction shall be based on the maximum allowable water use per plumbing fixture, and fittings as required by the California Building Standards Code.

- 99.05.410.1. Recycling by Occupants. Provide readily accessible areas that serve the entire building and are identified for the depositing, storage, and collection of non-hazardous materials for recycling, including (at a minimum) paper, corrugated cardboard, glass, plastics and metals.

Responses to comments submitted by the Center for Biological Diversity are addressed in Response to Comment Nos. E7-15 through E7-43 below.

COMMENT NO. E7-10

V. The EIR's Air Quality Analysis Understates Project Impacts and the Project's Likely Impacts to Human Health.

CEQA requires environmental review of a Project's potentially adverse impacts on human beings. (Guidelines § 15065 subd. (a)(2).) The project site is located along the Alameda Corridor connecting the Ports of Los Angeles and Long Beach to downtown heavy rail lines and is heavily traversed by diesel trucks and railroads. Existing air quality is among the worst in the South Coast Air Basin, and childhood asthma rates far exceed the average. Under these existing conditions, any Project contributions to poor air quality are cumulatively considerable. "One of the most important environmental lessons evident from past experience is that environmental damage often occurs incrementally from a variety of small sources." (*King County Farm Bureau v. City of Hanford* (1990) 221 Cal.App.3d 692.) This is particularly true with regard to air quality.

The health hazards of poor air quality are well documented. Countless peer-reviewed studies have been published documenting the dangers of living near freeways due to their emissions of ultra fine diesel particulate matter and other air pollutants. Ultra fine particulate matter causes cardiovascular and neuron damage. (See http://www.arb.ca.gov/research/health/healthup/jan03.pdf; see also http://ehp03.niehs.nih.gov/article/fetchArticle.action?articleURI=info%3Adoi%2F10.1289%2Fehp.10029 73, both incorporated by reference.) Life expectancy rises as fine particle pollution drops. (See, http://articles.latimes.com/2012/dec/04/science/la-sci-sn-fine-particle-pollution-20121204, citing Harvard School of Public Health Study published in *Epidemiology*.) More than 90 percent of the particles in diesel exhaust are ultra fine particles, which are easily inhaled into the lung. (Matsuoka, Hricko, et al. Global Trade Impacts: Addressing the Health, Social, and Environmental Consequences of Moving International Freight Through Our Communities, March 2011, p. 17, available at http://departments.oxy.edu/uepi/, herein incorporated.) Diesel particulate matter also contains gases such as acetaldehyde, acrolein, benzene, 1,3-butadiene, formaldehyde and polycyclic aromatic hydrocarbons, increasing the hazards to human health. (Matsuoka, Hricko, et al. Global Trade Impacts: Addressing the Health, Social, and Environmental Consequences of Moving International Freight Through Our Communities, March 2011, p. 17, available at http://departments.oxy.edu/uepi/, herein incorporated.) Consequently, diesel particulate matter was declared a toxic air contaminant by the California Air Resources Board in 1998. According to the Air Resources Board, "Diesel particulate matter may cause cancer, premature death, and other health problems." (See http://www.arb.ca.gov/enf/hdvip/ccdet/saej1667.htm; see also, http://www.arb.ca.gov/ch/communities/ra/westoakland/documents/factsheet0308.pdf.) These other health problems include asthma, bronchitis, and heart disease. (Miller et al., Long Term Exposure to Air

Pollution and Incidence of Cardiovascular Events in Women, New England Journal of Medicine, 356:5 (2007) 447-458, available at http://burningissues.org/car-www/pdfs/miller-women-cv-NEJM4-2007.pdf, herein incorporated; see also http://www.ehib.org/page.jsp?page_key=90#pm_health.)

These pollutants have been correlated with asthma, congestive heart failure, autism, and other ailments, with the greatest impact on sensitive receptors such as children and the elderly, many of whom live near the Project site.

A study released just last week linked chronic exposure to microscopic air pollutants in vehicle exhaust, such as that experienced by the residents of this community, to deaths from heart disease. (Associations of Mortality with Long-Term Exposures to Fine and Ultrafine Particles, Species and Sources: Results from the California Teachers Study Cohort, Ostro et al., available online at http://ehp.niehs.nih.gov/wp-content/uploads/advpub/2015/1/ehp.1408565.acco.pdf, herein incorporated.) According to the *Los Angeles Times*' coverage of the study, "The finding bolsters evidence that ultrafine particles… contributor to health problems among people living near traffic." (LA Times, Feb. 25, 2015 http://www.latimes.com/local/lanow/la-tiny-pollutants-linked-to-heart-disease-deaths-20150225-story.html .) Major roadways were among the most ubiquitous of hundreds of sources of ultrafine particle pollution examined in the study.

Given the environmental baseline, the DEIR's air quality analysis and health risk assessment are of particular importance to the City's evaluation of the Project and to the surrounding community. As the Project's truck trips will likely comprise the majority of the Project's air pollution emissions, these analyses are based on the developer's estimated numbers of daily truck trips. Unfortunately, the numbers reported appear to underestimate the Project's true contributions to poor air quality – and especially to diesel emissions – and therefore appear to understate the significance of the Project's air quality impacts.

RESPONSE NO. E7-10

See Response to Comment No. E7-2 above as it relates to health and air quality, including diesel emissions and the methodology for estimated truck trips generated by the proposed project.

"Cumulatively considerable" means that the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects. This requires a local lead agency to determine whether pollution from a proposed project will have significant effects on any nearby communities, when considered together with any pollution burdens those communities already are bearing, or may bear from probably future projects. Where there already is a high pollution burden on a community, the relevant question is whether any additional amount of pollution should be considered significant in light of the serious nature of the existing problem.[12] An evaluation of the cumulative impacts to air quality/pollution has been disclosed in Section IV.B, *Air Quality*, of the Draft EIR, in particular on pages IV.B-22 and IV.B-23.

Emissions of criteria pollutants generated during construction and operation of the proposed project are calculated to be well below acceptable thresholds except with respect to PM_{10} emissions during construction, which can be fully mitigated through implementation of Mitigation Measures Air-1, Air-2, and Air-3.

In addition to the above mitigation measures, emissions generated from mobile sources will be further

[12] Harris, Kamala D. 10 July 2012. *Environmental Justice at the Local and Regional Level: Legal Background*. Prepared by State of California Department of Justice. Available at: http://oag.ca.gov/sites/all/files/agweb/pdfs/environment/ej_fact_sheet.pdf

reduced below acceptable levels as a result of the On-Road Heavy-Duty Diesel Vehicles Regulation Amendments approved by CARB in April 2014. The main objective of this regulation is to reduce emissions from heavy-duty diesel trucks and buses by installing new filters and upgrading engines. The regulation mandates that all new heavy-duty trucks and buses must have particulate matter filters that meet CARB requirements by January 1, 2012. Lighter and older heavy trucks must be replaced starting in January 1, 2015. All trucks and buses are required to have model year 2010 engines or equivalent by January 1, 2023. The scope of the regulation includes both public and private vehicles. This language has been added to Section IV, *Corrections and Additions to the Draft EIR* on Page IV-9.

The Draft EIR demonstrates that there are no significant adverse impacts on air quality during operation of the proposed project. Therefore the adoption of mitigation is not required. The Draft EIR nevertheless proposes Mitigation Measures Air-4 and Air-6 to further reduce potential emissions of criteria air pollutants. Mitigation Measure Air-4 is:

Air-4

The project applicant shall establish incentives for increased transit frequency- in compliance with the transportation demand management and trip reduction measures set forth in Section 12.26J of the Los Angeles Municipal Code, which include the following requirements for non-residential projects with more than 100,000 square feet of floor area.

(a) Development in excess of 25,000 square feet of gross floor area. The owner shall provide a bulletin board, display case, or kiosk (displaying transportation information) where the greatest number of employees are likely to see it. The transportation information displayed should include, but is not limited to, the following:

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(4) Regional/local bicycle route and facility information;

(5) A listing of on-site services or facilities which are available for carpoolers, vanpoolers, bicyclists, and transit riders.

(b) Development in excess of 50,000 square feet of gross floor area. The owner shall comply with Paragraph (a) above and in addition shall provide:

(1) A designated parking area for employee carpools and vanpools as close as practical to the main pedestrian entrance(s) of the building(s). This area shall include at least ten percent of the parking spaces required for the site. The spaces shall be signed and striped sufficient to meet the employee demand for such spaces. The carpool/vanpool parking area shall be identified on the driveway and circulation plan upon application for a building permit;

(2) One permanent, clearly identified (signed and striped) carpool/vanpool parking space for the first 50,000 to 100,000 square feet of gross floor area and one additional permanent, clearly identified (signed and striped) carpool/vanpool parking space for any development over 100,000 square feet of gross floor area;

(3) Parking spaces clearly identified (signed and striped) shall be provided in the designated carpool/vanpool parking area at any time during the building's occupancy sufficient to meet employee demand for such spaces. Absent such demand, parking spaces within the designated carpool/vanpool parking area may be used by other vehicles;

(4) No signed and striped parking spaces for carpool/vanpool parking shall displace any handicapped parking;

(5) A statement that preferential carpool/vanpool spaces are available on-site and a description of the method for obtaining permission to use such spaces shall be included on the required transportation information board;

(6) A minimum vertical clearance of 7 feet 2 inches shall be provided for all parking spaces and accessways used by vanpool vehicles when located within a parking structure;

(7) Bicycle parking shall be provided in conformance with Section 12.21A16 of this Code.

(c) Development in excess of 100,000 square feet of gross floor area. The owner shall comply with Paragraphs (a) and (b) above and shall provide:

(1) A safe and convenient area in which carpool/vanpool vehicles may load and unload passengers other than in their assigned parking area;

(2) Sidewalks or other designated pathways following direct and safe routes from the external pedestrian circulation system to each building in the development;

(3) If determined necessary by the City to mitigate the project impact, bus stop improvements shall be provided. The City will consult with the local bus service providers in determining appropriate improvements. When locating bus stops and/or planning building entrances, entrances shall be designed to provide safe and efficient access to nearby transit stations/stops;

(4) Safe and convenient access from the external circulation system to bicycle parking facilities on-site.

Mitigation Measure Air-6 is:

Air-6

The project applicant shall provide traffic calming measures through street improvements. The applicant will be dedicating additional right-of-way along 41st Street, Alameda Street, and Martin Luther King, Jr. Boulevard. In connection with the street dedications and development of the proposed project, the applicant will be upgrading existing sidewalks, curb and gutter, as well as street trees, street lighting, and street furniture around the entire perimeter of the property in consultation with the City Department of Transportation and Department of Public Works. Upgrades to the existing sidewalks will require new curb cuts and crosswalks and the replacement of existing traffic signals at intersections. Additional traffic control devices will be installed as necessary and required to facilitate safe traffic circulation in and around the proposed project site.

Traffic calming measures help reduce traffic and balance it with other forms of active transportation on the street. Potential street improvements could include crosswalks, sidewalks, street lighting, curb

modifications, street parking, and efforts to improve vehicular circulation.

The proposed project will also be required to comply with the transportation demand management and trip reduction measures set forth in Section 12.26J of the Los Angeles Municipal Code, which include the following requirements for non-residential projects with more than 100,000 square feet of floor area. These specific TDM measures have been incorporated into Measure Air-4 on page IV-4 Section IV, Corrections and Additions.

(a) Development in excess of 25,000 square feet of gross floor area. The owner shall provide a bulletin board, display case, or kiosk (displaying transportation information) where the greatest number of employees are likely to see it. The transportation information displayed should include, but is not limited to, the following:

(1) Current routes and schedules for public transit serving the site;

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(5) A statement that preferential carpool/vanpool spaces are available on-site and a description of the method for obtaining permission to use such spaces shall be included on the required transportation information board;

(6) A minimum vertical clearance of 7 feet 2 inches shall be provided for all parking spaces and accessways used by vanpool vehicles when located within a parking structure;

(7) Bicycle parking shall be provided in conformance with Section 12.21A16 of this Code.

(c) Development in excess of 100,000 square feet of gross floor area. The owner shall comply with Paragraphs (a) and (b) above and shall provide:

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(3) If determined necessary by the City to mitigate the project impact, bus stop improvements shall be provided. The City will consult with the local bus service providers in determining appropriate improvements. When locating bus stops and/or planning building entrances, entrances shall be designed to provide safe and efficient access to nearby transit stations/stops;

(4) Safe and convenient access from the external circulation system to bicycle parking facilities on-site.

COMMENT NO. E7-11

The EIR assumes that the nearly one-half million square feet of industrial warehouse space will draw only 75 diesel trucks per day. By contrast, a similar, but slightly smaller project evaluated by the city in 2008 at the project site assumed generation of 264 truck trips per day. (Case No. ENV-2008-799-MND, VTT-61482, DIR-2008-841-SPR.) The DEIR fails to include sufficient information about the Project to justify the claimed 70 percent *reduction* in diesel truck trips that accompany the Project's 10 percent *increase* in size. The DEIR's analysis of air quality impacts and health risks must be repeated in a revised DEIR that provides substantial evidence for its conclusions. This EIR must also include feasible and enforceable mitigation measures for the operation of the trucks. If this EIR purports to rely on cleaner technologies or other methods of shipping and receiving than diesel trucks, it must be demonstrated that these technologies and methods are both feasible and available to the Project.

RESPONSE NO. E7-11

Your comment regarding the number of truck trips and the resulting air quality impacts has been noted. As noted in Response to Comment No. E7-2, above, the size of delivery trucks anticipated for this project consist of 9 percent (or 31) diesel-fueled trucks on average per day based on a conservative projection of 351 truck trips per day consistent with trip generation rates published by the Insitute of Transportation Engineers. See Response to Comment No. E7-2 above as it relates to health and air quality, including diesel emissions and the methodology for estimated truck trips generated by the proposed project.

Section VI, *Alternatives*, of the Draft EIR examines the following alternatives: Alternative A, No Project Alternative; Alternative B, Use of Clean Fuel Trucks; and Alternative C, Reduced Truck Operations. These alternatives provide ways to reduce the environmental impact of the proposed project. The project applicant has indicated that truck trips associated with operation of the proposed project would not exceed 75 daily truck trips, which has therefore been analyzed as Alternative C. This assumption stems from the

existing operations at various facilities, which will be consolidated in the proposed project. Currently, there is a maximum of 33 truck trips/day total for the various facilities. The proposed project build out is not expected to significantly increase this number of trips; hence the 75 daily truck trips was taken as the conservative assumption in Alternative C of the Draft EIR.

COMMENT NO. E7-12

VI. The EIR Fails to Adequately Consider the Project's Noise Impacts on Surrounding Residential Neighborhoods.

The Initial Study found the Project's noise impacts insignificant resulting in the DEIR's failure to analyze and mitigate the Project's noise impacts on the community. (Initial Study, Exhibit B, p. 116, 124.) However, this conclusion lacks substantial evidence. First, the project description provides insufficient information about the project to accurately evaluate its proposed noise impacts. This is important, given that homes are located within 153 feet of the Project site. The Initial Study contemplates heating and air conditioning equipment and traffic, but none of the operations of the proposed warehouse itself. (*Id.* at 124.) Second, existing community noise levels are so high that any additional noise levels are considered cumulatively considerable and require mitigation.

According to the U.S. Environmental Protection Agency, exposure to high noise levels presents a "health risk in that noise may contribute to the development and aggravation of stress related conditions such as high blood pressure, coronary disease, ulcers, colitis, and migraine headaches…Growing evidence suggests a link between noise and cardiovascular problems. There is also evidence suggesting that noise may be related to birth defects and low birth-weight babies. There are also some indications that noise exposure can increase susceptibility to viral infection and toxic substances." (EPA Noise Effects Handbook, http://www.nonoise.org/library/handbook/handbook.htm, incorporated by reference; see also EPA *Noise: A Health Problem* http://www.nonoise.org/library/epahlth/epahlth.htm#heart%20disease, incorporated by reference.)

Potentially deadly cardiovascular impacts can be triggered by long-term average exposure to noise levels as low as 55 decibels. (See, World Health Organization Media Centre, http://www.euro.who.int/eprise/main/WHO/MediaCentre/PR/2009/20091008_1?language [elevated blood pressure and heart attacks], incorporated by reference; http://whqlibdoc.who.int/hq/1999/a68672.pdf [finding demonstrated cardiovascular impacts, including ischemic heart disease and hypertension after long-term exposure to 24 hour average noise values of 65-70 dBA], incorporated by reference.) Exposure to even moderately high levels of noise during a single eight-hour period triggers the body's stress response. In turn, the body increases cortisol production, which stimulates vasoconstriction of blood vessels that results in a five to ten point increase in blood pressure. Over time, this noise-induced stress can result in hypertension and coronary artery disease, both of which increase the risk of heart attack death. (World Health Organization Media Centre, http://www.euro.who.int/eprise/main/WHO/MediaCentre/PR/2009/20091008_1?language [elevated blood pressure and heart attacks], incorporated by reference; http://whqlibdoc.who.int/hq/1999/a68672.pdf [finding demonstrated cardiovascular impacts, including ischemic heart disease and hypertension after long-term exposure to 24 hour average noise values of 65-70 dBA], incorporated by reference.) Studies on the use of tranquilizers, sleeping pills, psychotropic drugs, and mental hospital admission rates suggest that high noise levels cause adverse impacts on mental health.

High noise levels also have dramatic developmental impacts on small children, many of whom might reside near the Project. Children who are exposed to higher average noise levels have heightened sympathetic arousal, expressed by increased stress hormone levels, and elevated resting blood pressure. Without mitigation, the Project might expose community members to levels of noise that are unsafe for

cardiovascular health, mental health, societal well being, and child development.

The noise study performed with the Initial Study concluded that the existing ambient noise levels in the community already vastly exceed those at which residential development is permitted in the City of Los Angeles. (Initial Study, Exhibit B, pp. 118, 121.) The State of California does not consider areas with ambient noise levels above 60 dbA acceptable for residential use. (*Id.* at p. 118.) Multi-family residential uses are "normally acceptable" only below 65 dBA. (*Ibid.*) Residential uses up to 70 dBA are permitted only when precautions are taken to reduce indoor noise levels. (*Ibid.*) Even so, the noise study reported average ambient noise levels of 63-75 dBA Leq with maximum noise levels of up to 94 dBA Leq. If the Project will contribute to *any* increase in community noise levels, the Project will have significant cumulative impacts that must be disclosed, analyzed, and mitigated in the EIR. (*Los Angeles Unified School Dist. v. City of Los Angeles* (1997) 58 Cal.App.4th 1019, 1026.) This EIR has failed to do so. The DEIR must be revised to include analysis of the proposed warehouse operations and to include specific, feasible and enforceable mitigation that protects sensitive receptors that reside as close as 153 feet away.

RESPONSE NO. E7-12

Your comment regarding the potential detrimental health impacts of noise and the requirement for mitigation measures to address noise levels cumulatively generated by the proposed project has been noted. As a result of the Initial Study, refinements to the project design features were made. As seen on page A-8 of the Initial Study, Sections 1.3.2, 2.6.1.1, and 2.8, and Figure 1.3.2-1 of the Noise Technical Report, a Temporary Noise Barrier is included as a project design feature to reduce the exposure of the nearest homes located 153 feet from the proposed project site. As described in Section XII, *Noise* of the Initial Study (page B-124 of the Initial Study), the noise barrier would reduce noise levels by 6 dBA, to below the 75 dBA level allowed at sensitive receptors during construction pursuant to *Section 112.05 of the Los Angeles Municipal Code.* The City of Los Angeles CEQA Thresholds Guide states that a project would normally have a significant impact on noise levels from construction if:

- Construction activities lasting more than one day would exceed existing ambient exterior noise levels by 10 dBA or more at a noise sensitive use;
- Construction activities lasting more than 10 days in a three month period would exceed existing ambient exterior noise levels by 5 dBA or more at a noise sensitive use; or
- Construction activities would exceed the ambient noise level by 5 dBA at a noise sensitive uses between the hours of 9:00 p.m. and 7:00 a.m. Monday through Friday, before 8:00 a.m. or after 6:00 p.m. on Saturday, or at any time on Sunday.

Furthermore, the City's Noise Regulation states that the baseline ambient noise shall be the actual measured ambient noise level or the City's presumed ambient noise level, whichever is greater. As shown in Section 2.7 of the Noise Technical Report and in the Impact Analysis contained in Section XII, *Noise*, of the Initial Study, Appendix III, Volume III of the Draft EIR, the proposed project would not exceed the thresholds set forth in the City's CEQA Threshold Guide and thus would be in compliance with the City's noise regulation. As presented in Section XII, *Noise* of the Initial Study (based on data collected from November 1, 2013), the existing daytime ambient noise levels at the seven monitoring locations ranged from 51.5 dBA (L_{eq}) at monitoring location A6 to 94.0 dBA (L_{eq}) at monitoring location A4. The average L_{eq} for daytime ambient noise levels ranged from 63.9 dBA (L_{eq}) at monitoring location A3 to 75.2 dBA (L_{eq}) at monitoring location A4. As indicated in Tables XII-7 and XII-8 of Section XII, *Noise* of the Initial Study, the noise levels associated with building equipment and traffic to the proposed project area are consistent with existing noise levels and would not result in an audible increase in ambient noise levels.

COMMENT NO. E7-13

Conclusion

As proposed, the warehouse project would have significant and unavoidable adverse impacts on a community already facing the noise and air pollution of the Alameda Corridor and the City's densest industrial development. Even so, the DEIR fails to consider alternatives to the Project such as a community garden that have broad community support and that would meet the City's economic objectives. Due to the deficiencies outlined above, the DEIR requires revision and recirculation. The South Central Farmers hope that the City's revised DEIR more accurately discloses, analyzes, and mitigates the Project's likely impacts and that it considers alternatives to the Project that will increase, *not decrease*, the quality of life for local families.

RESPONSE NO. E7-13

See Response to Comment Nos. E7-1 through E7-12 above. As discussed in Response to Comment No. E7-2, the community garden/recreation alternatives were analyzed but withdrawn from consideration as alternatives as they did not meet basic project objectives. With regard to cumulative air quality impacts, as discussed in Response to Comment No. E7-10, emissions of criteria pollutants generated during construction and operation of the proposed project are calculated to be well below acceptable thresholds except with respect to PM_{10} emissions during construction, which can be fully mitigated through implementation of Mitigation Measures Air-1, Air-2, and Air-3. The Draft EIR demonstrates that there are no significant adverse impacts on air quality during operation of the proposed project.

In addition to the above mitigation measures, emissions generated from mobile sources will be further reduced below acceptable levels as a result of the On-Road Heavy-Duty Diesel Vehicles Regulation Amendments approved by CARB in April 2014. The main objective of this regulation is to reduce emissions from heavy-duty diesel trucks and buses by installing new filters and upgrading engines. The regulation mandates that all new heavy-duty trucks and buses must have particulate matter filters that meet CARB requirements by January 1, 2012. Lighter and older heavy trucks must be replaced starting in January 1, 2015. All trucks and buses are required to have model year 2010 engines or equivalent by January 1, 2023. The scope of the regulation includes both public and private vehicles. This language has been added to Section IV, Corrections and Additions on Page IV-9.

Therefore the adoption of mitigation is not required. The Draft EIR nevertheless proposes Mitigation Measures Air-4 and Air-6 to further reduce potential emissions of criteria air pollutants. Mitigation Measure Air-4 is:

> **Air-4**
>
> The project applicant shall establish incentives for increased transit frequency~~,~~ in compliance with the transportation demand management and trip reduction measures set forth in Section 12.26J of the Los Angeles Municipal Code, which include the following requirements for non-residential projects with more than 100,000 square feet of floor area.
>
> **(a) Development in excess of 25,000 square feet of gross floor area.** The owner shall provide a bulletin board, display case, or kiosk (displaying transportation information) where the greatest number of employees are likely to see it. The transportation information displayed should include, but is not limited to, the following:
>
> (1) Current routes and schedules for public transit serving the site;

(2) Telephone numbers for referrals on transportation information including numbers for the regional ridesharing agency and local transit operations;

(3) Ridesharing promotion material supplied by commuter-oriented organizations;

(4) Regional/local bicycle route and facility information;

(5) A listing of on-site services or facilities which are available for carpoolers, vanpoolers, bicyclists, and transit riders.

(b) Development in excess of 50,000 square feet of gross floor area. The owner shall comply with Paragraph (a) above and in addition shall provide:

(1) A designated parking area for employee carpools and vanpools as close as practical to the main pedestrian entrance(s) of the building(s). This area shall include at least ten percent of the parking spaces required for the site. The spaces shall be signed and striped sufficient to meet the employee demand for such spaces. The carpool/vanpool parking area shall be identified on the driveway and circulation plan upon application for a building permit;

(2) One permanent, clearly identified (signed and striped) carpool/vanpool parking space for the first 50,000 to 100,000 square feet of gross floor area and one additional permanent, clearly identified (signed and striped) carpool/vanpool parking space for any development over 100,000 square feet of gross floor area;

(3) Parking spaces clearly identified (signed and striped) shall be provided in the designated carpool/vanpool parking area at any time during the building's occupancy sufficient to meet employee demand for such spaces. Absent such demand, parking spaces within the designated carpool/vanpool parking area may be used by other vehicles;

(4) No signed and striped parking spaces for carpool/vanpool parking shall displace any handicapped parking;

(5) A statement that preferential carpool/vanpool spaces are available on-site and a description of the method for obtaining permission to use such spaces shall be included on the required transportation information board;

(6) A minimum vertical clearance of 7 feet 2 inches shall be provided for all parking spaces and accessways used by vanpool vehicles when located within a parking structure;

(7) Bicycle parking shall be provided in conformance with Section 12.21A16 of this Code.

(c) Development in excess of 100,000 square feet of gross floor area. The owner shall comply with Paragraphs (a) and (b) above and shall provide:

(1) A safe and convenient area in which carpool/vanpool vehicles may load and unload passengers other than in their assigned parking area;

(2) Sidewalks or other designated pathways following direct and safe routes from the external pedestrian circulation system to each building in the development;

(3) If determined necessary by the City to mitigate the project impact, bus stop improvements shall be provided. The City will consult with the local bus service providers in determining appropriate improvements. When locating bus stops and/or planning building entrances, entrances shall be designed to provide safe and efficient access to nearby transit stations/stops;

(4) Safe and convenient access from the external circulation system to bicycle parking facilities on-site.

Mitigation Measure Air-6 is:

Air-6

The project applicant shall provide traffic calming measures through street improvements. The applicant will be dedicating additional right-of-way along 41st Street, Alameda Street, and Martin Luther King, Jr. Boulevard. In connection with the street dedications and development of the proposed project, the applicant will be upgrading existing sidewalks, curb and gutter, as well as street trees, street lighting, and street furniture around the entire perimeter of the property in consultation with the City Department of Transportation and Department of Public Works. Upgrades to the existing sidewalks will require new curb cuts and crosswalks and the replacement of existing traffic signals at intersections. Additional traffic control devices will be installed as necessary and required to facilitate safe traffic circulation in and around the proposed project site.

Traffic calming measures help reduce traffic and balance it with other forms of active transportation on the street. Potential street improvements could include crosswalks, sidewalks, street lighting, curb modifications, street parking, and efforts to improve vehicular circulation. The proposed project will also be required to comply with the transportation demand management and trip reduction measures set forth in Section 12.26J of the Los Angeles Municipal Code, which include the following requirements for non-residential projects with more than 100,000 square feet of floor area. These specific TDM measures have been incorporated into Measure Air-4 on page IV-4 of Section IV, Corrections and Additions.

(a) Development in excess of 25,000 square feet of gross floor area. The owner shall provide a bulletin board, display case, or kiosk (displaying transportation information) where the greatest number of employees are likely to see it. The transportation information displayed should include, but is not limited to, the following:

(1) Current routes and schedules for public transit serving the site;

(2) Telephone numbers for referrals on transportation information including numbers for the regional ridesharing agency and local transit operations;

(3) Ridesharing promotion material supplied by commuter-oriented organizations;

(4) Regional/local bicycle route and facility information;

(5) A listing of on-site services or facilities which are available for carpoolers, vanpoolers, bicyclists, and transit riders.

(b) Development in excess of 50,000 square feet of gross floor area. The owner shall comply with Paragraph (a) above and in addition shall provide:

(1) A designated parking area for employee carpools and vanpools as close as practical to the

main pedestrian entrance(s) of the building(s). This area shall include at least ten percent of the parking spaces required for the site. The spaces shall be signed and striped sufficient to meet the employee demand for such spaces. The carpool/vanpool parking area shall be identified on the driveway and circulation plan upon application for a building permit;

(2) One permanent, clearly identified (signed and striped) carpool/vanpool parking space for the first 50,000 to 100,000 square feet of gross floor area and one additional permanent, clearly identified (signed and striped) carpool/vanpool parking space for any development over 100,000 square feet of gross floor area;

(3) Parking spaces clearly identified (signed and striped) shall be provided in the designated carpool/vanpool parking area at any time during the building's occupancy sufficient to meet employee demand for such spaces. Absent such demand, parking spaces within the designated carpool/vanpool parking area may be used by other vehicles;

(4) No signed and striped parking spaces for carpool/vanpool parking shall displace any handicapped parking;

(5) A statement that preferential carpool/vanpool spaces are available on-site and a description of the method for obtaining permission to use such spaces shall be included on the required transportation information board;

(6) A minimum vertical clearance of 7 feet 2 inches shall be provided for all parking spaces and accessways used by vanpool vehicles when located within a parking structure;

(7) Bicycle parking shall be provided in conformance with Section 12.21A16 of this Code.

(c) Development in excess of 100,000 square feet of gross floor area. The owner shall comply with Paragraphs (a) and (b) above and shall provide:

(1) A safe and convenient area in which carpool/vanpool vehicles may load and unload passengers other than in their assigned parking area;

(2) Sidewalks or other designated pathways following direct and safe routes from the external pedestrian circulation system to each building in the development;

(3) If determined necessary by the City to mitigate the project impact, bus stop improvements shall be provided. The City will consult with the local bus service providers in determining appropriate improvements. When locating bus stops and/or planning building entrances, entrances shall be designed to provide safe and efficient access to nearby transit stations/stops;

(4) Safe and convenient access from the external circulation system to bicycle parking facilities on-site.

As discussed in Response to Comment No. E7-12 above, the noise levels associated with building equipment and traffic to the proposed project area are consistent with existing noise levels and would not result in an audible increase in ambient noise levels. In sum, the project would not result in significant and unavoidable adverse impacts to noise or air quality. The proposed project has mitigated all significant impacts to below a level of significance through mitigation measures with the exception of traffic impacts

at the intersection of Alameda Street and East Washington Boulevard. Under Alternative C, the project would generate no more than 75 truck trips per day, and an analysis with this reduced number of truck trips results in no significant impacts at any of the study intersections.

COMMENT NO. E7-14

Thank you for your consideration of these comments. We join in the comments submitted by the Natural Resources Defense Council and Public Counsel on this draft EIR and hereby incorporate them by reference. In addition, pursuant to Public Resources Code section 21092.2, we hereby request notice of all future meetings and environmental notices issued pursuant to CEQA at this site. We look forward to reviewing the revisions to this draft environmental impact report.

RESPONSE NO. E7-14

Your name and contact information has been added to the project distribution list and you will be kept informed of future public hearings and documents.

In Comment No. E7-9, above, the law firm of Chatten-Brown & Carstens, incorporated by reference, a letter of comment submitted by the Center for Biological Diversity in response to circulation for public review, a mitigated negative declaration for an industrial park project proposed in 2008. The 2008 MND was for an industrial park project proposed by The Horowitz Group, the property owner prior to 2012, for a different project applicant. The previous project was proposed prior to the City action in 2011 to allow for substitution of a cash pledge for the dedication of 2.6 acres for on-site development of a park on the property. Responses are provided in light of the current disposition of the property.

The following comments are submitted on behalf of Matthew Vespa for the Center for Biological Diversity as allowed by law. The letter is regarding the 2008 project and not the present Draft EIR. Comments follow with responses.

COMMENT NO. E7-15

These comments are submitted on behalf of the Center for Biological Diversity ("Center"), the South Central Farmers Action Fund, Rufina Juarez and Tezozomoc on the Mitigated Negative Declaration ("'MND") and Initial Study for the 41st and Alameda Warehouse Project; Case No. ENV-2008-799-MND, VTT-61482, DIR-2008-841-SPR ("'the Project"). The Project contemplates the construction of a warehouse facility and distribution center with approximately 643,000 square feet of warehouse and ancillary support space site including 345 parking spaces on 10.04 acres of vacant land that was historically used as a community garden for underserved residents of south central Los Angeles.

The Center is a non-profit environmental organization working through its Climate Air, and Energy Program to reduce greenhouse gas emissions to protect biological diversity, our environment, and public health. The Center has over 40,000 members including members in the City of Los Angeles who would be negatively impacted by the Project.

South Central Farmers Action Fund is a nonprofit public benefit corporation and is not organized for the private gain of any person. It is organized under the Nonprofit Public Benefit Corporation Law for public purposes. The specific purpose of the corporation shall be to educate the public and promote the need for and benefits of preserving, maintaining, acquiring, and cultivating farm land in urban areas, and to work with other groups and individuals that promote the need for and benefits of urban farm land throughout California and the United States, and to carry on other public purposes and activities associated with these goals as allowed by law.

RESPONSE NO. E7-15

Your comments on the 2008 MND and Initial Study for the 41st and Alameda Warehouse Project have been noted. The City acknowledges the Center's and South Central Farmers Action Fund's interest in protecting the environment, farmlands, biodiversity and public health.

COMMENT NO. E7-16

The MND cavalierly dismisses Project impacts on global warming on the grounds that: 1) warehouse demand would require construction someplace else even if the project were not built; and 2) consolidation of existing facilities would not increase fuel consumption. Initial Study at III-80. This type of conclusory analysis is exactly the type of "clearly erroneous or inaccurate" reasoning condemned by the California Environmental Quality Act ("CEQA"). CEQA Guidelines § 15384(a). Indeed, the MND's flawed approach is in direct contravention of guidance by the California Office of Planning and Research calling for the full quantification of greenhouse gas emissions from new development (California Office of Planning and Research 2008).

RESPONSE NO. E7-16

The concerns expressed by the Center for Biological Diversity regarding the lack of analysis of the effects of the 2008 project on global warming are not relevant to the Draft EIR for the proposed project. Section IV.D *Greenhouse Gas Emissions* of the Draft EIR, provides a thorough evaluation of the impacts of both the construction and operational phases of the project on greenhouse gas emission, consistent with the guidance established in Appendix G of the State CEQA Guidelines. Please refer to the Air Quality and Greenhouse Gas Emissions Technical Report (Appendix IV in Volume IV of the Draft EIR) for further detail.

COMMENT NO. E7-17

In addition, the City of Los Angeles City Attorney and City Council have also emphasized the importance of analyzing the significance of greenhouse gas emissions through the CEQA process (LA City Council 2008, LA City Attorney 2007). The City Attorney has outlined a proposal to require projects to analyze and mitigate projects subject to discretionary approval under CEQA (LA City Attorney 2007). As the MND has not demonstrated that existing buildings would be demolished and permanently dedicated to non-carbon producing activities such as community open space there is no valid basis to suggest that the Project's emissions are not new emissions. The MND's failure to analyze the Project's contributions to climate change violates CEQA.

RESPONSE NO. E7-17

The concerns expressed by the Center for Biological Diversity regarding the consideration of baseline conditions for air quality and greenhouse gas emission have been fully addressed in the Draft EIR. Section III *Project Description* of the Draft EIR details the square footage of warehouse, manufacturing, and office space for the proposed project, number of parking spaces, and number of new and relocated jobs. No offset for criteria pollutants, diesel emissions, or greenhouse gas emissions, was ascribed to existing operations at nearby locations for the 2008 project applicant or the 2014 project applicant. These stationary sources, the construction scenario, and mobile sources were built into the modeling for the quantification of the air quality and greenhouse gas emissions. The analysis was based on the baseline conditions as they existed at the time of publication of the Notice of Preparation in June 2014. Operation of facilities operated by the 2008 project applicant, and existing operations of the current project applicant

are part of the baseline conditions for the purpose of analysis of greenhouse gas emissions and air quality. As a result of the analysis of greenhouse gas emissions, the Draft EIR determined that implementation of the proposed project would not be expected to result in significant impacts to greenhouse gas emissions. Therefore, no mitigation measures are required with respect to greenhouse gas emissions. Mitigation measures with respect to Air Quality are proposed in Section IV.B *Air Quality* of the Draft EIR. Please refer to the Air Quality and Greenhouse Gas Emissions Technical Report (Appendix IV in Volume IV of the Draft EIR) for further detail.

COMMENT NO. E7-18

The Project's proposed conversion of vacant land from previous community agricultural use to a large scale warehouse with over 2,500 daily vehicle trips will generate large amounts of diesel and greenhouse gas pollution that must be fully analyzed and mitigated under CEQA. As set forth more fully below, where, as here, the Project would generate additional unmitigated greenhouse gas emissions, there is a fair argument that the Project may have a significant cumulative impact on the environment requiring the preparation of an Environmental Impact Report ("EIR"). Under CEQA, an EIR must be prepared even if the lead agency can point to substantial evidence in the record supporting its determination that no significant effect will occur. *Architectural Heritage Assn. v. County of Monterey,* 122 Cal. App. 4th 1095, 1110 (2004). The lead agency may not dismiss evidence because it believes that there is contrary evidence that is more credible. *Pocket Protectors v. City of Sacramento,* 124 Cal. App. 4th 903, 935 (2005). Either there is substantial evidence showing the possibility of a significant environmental effect or there is not. If there is, then the lead agency must prepare an EIR. *Architectural Heritage Assn.,* 122 Cal. App. 4th at 1109-1110. Importantly, the "fair argument" test "establishes a low threshold for initial preparation of an EIR, which reflects a preference for resolving doubts in favor of environmental review." *I d.* at 1110.

RESPONSE NO. E7-18

The concerns expressed by the Center for Biological Diversity regarding the request for preparation of an EIR have been addressed in relation to the 2014 proposed project. The City of Los Angeles prepared an Initial Study for the proposed project and published a Notice of Preparation of an EIR and solicited scoping comments between June 17 and July 17, 2014. A Draft EIR for the 4051 South Alameda Street Project was prepared by the City of Los Angeles Department of City Planning, Environmental Analysis Section, and circulated for public review between January 22 and March 9, 2015.

COMMENT NO. E7-19

As a potential significant impact, the environmental analysis must thoroughly evaluate mitigation measures and alternatives that would reduce the Project's greenhouse gas emissions. Curbing greenhouse gas emissions to limit the effects of climate change is one of the most urgent challenges of our time. In particular, the following alternatives and mitigation measures should be considered: an alternative that dedicates a significant portion of the project site as community open space, measures that reduce energy use and increase energy efficiency, reduce vehicle miles traveled, generate onsite renewable energy, and provide offsets for emissions that cannot be reduced on site.

RESPONSE NO. E7-19

Your comments regarding the consideration of alternatives to reduce the impacts of the project on greenhouse gas emissions have been noted. Section 15126.6 of the CEQA Guidelines requires an EIR to describe a range of reasonable alternatives to a project or to the location of a project that would feasibly attain most of the basic objectives of a project but would avoid or substantially lessen any of the

significant effects of a project, and evaluate the comparative merits of the alternatives. The discussion of alternatives, however, need not be exhaustive, but rather the discussion must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. An EIR is not required to consider alternatives that are deemed "infeasible." The consideration of alternatives is limited to avoiding or reducing significant impacts of the proposed project. As a result of the analysis of greenhouse gas emissions, the Draft EIR determined that implementation of the proposed project would not be expected to result in significant impacts to greenhouse gas emissions. Based on emissions modeling, unmitigated construction emissions equal approximately 643.22 metric tons of CO_{2e}. Operational emissions equal approximately 2,090.25 metric tons of CO_{2e} per year. The operational GHG emissions can be attributed to mobile sources associated with the proposed project's approximate 353,375 square feet of warehouse space. In the absence of regional thresholds adopted for GHG emissions, the CARB suggested threshold of 25,000 metric tons of CO_{2e} per year was utilized for the quantitative analysis of GHG emissions. Both construction and operational emissions are well below this threshold. Therefore, the consideration of mitigation measures and alternatives to avoid or reduce impacts is not warranted. However, unlike the project analyzed in the 2008 MND, the proposed project includes conformance with the California Green Building Standards, Title 24, Section 11 and the Los Angeles Green Building Code (LAGBC). The LAGBC is based on the 2013 California Green Building Standards Code, commonly known as *CalGreen*, which was developed and mandated by the state to attain consistency among various jurisdictions within the state; reduce the building's energy and water use; reduce waste; and reduce the carbon footprint.

In addition, Section VI *Alternatives* of the Draft EIR considers less polluting alternatives to the proposed project. Two alternatives are evaluated to reduce significant impacts on air quality, one including the use of clean fuel trucks and a second alternative that considers reduced truck operations. The reduced truck operations alternative is the environmentally superior alternative. Page VI-3 of the Draft EIR provides a summary of why a community garden or a parks and recreation alternative was deemed to not meet most of the basic objectives of the project. The community garden and park and recreation alternatives would not meet the basic objectives of the project as they would not attain the objective of providing a minimum of 480,000 square feet of light industrial space, consistent with the existing land use designation and zoning, would not provide light manufacturing jobs within 3 miles of an existing garment manufacturing labor force in the Southeast Los Angeles Community Plan Area, would not allow for development of an industrial park that is along the Alameda Corridor to take advantage of distribution efficiency opportunities, would not facilitate the ability of existing garment labor force, located in close proximity to the project site to utilize existing public transit system and other multi-modal transportation opportunities in vicinity of proposed project, would not preserve and/or redevelop the industrial sector of the Southeast Los Angeles Community Plan Area to accommodate emerging technologies, thus providing an enhanced employment base for the Community Plan Area's population, would not benefit the Southeast Los Angeles Community Plan area population as economic stimulation through employment opportunities, attracting commercial and industrial tenants to the area, and providing tax revenue for the City would not occur. Therefore, the community garden or parks and recreation alternatives were not carried forward for detailed evaluation in the EIR.

COMMENT NO. E7-20

Under CEQA, the environmental setting is typically described as physical environmental conditions on the project site as it existed at the time the Notice of Preparation is published. This approach is inappropriate here as the environmental conditions changed deliberately and drastically before the Initial Study/MND was issued. *See Save Our Peninsula Committee v.Monterey County Board of Supervisors,* 87 Cal. App. 4th 99, 125 (2001) ("the date for establishing baseline cannot be a rigid one."). Until its destruction, the project site was used as a community garden. Accordingly, the Project is not just the construction of a warehouse, it is the destruction of a community garden, grading of the project site,

and the subsequent construction of a warehouse and supporting facilities. The MND improperly segments these aspects and in doing so, understates Project impacts.

RESPONSE NO. E7-20

The concerns expressed by the Center for Biological Diversity regarding the project description and consideration of baseline conditions for air quality and greenhouse gas emission have been fully addressed in the Draft EIR. Part E of Section III *Project Description* of the Draft EIR acknowledges the full background history including the prior use of the proposed project site as a community garden. This section additionally includes a construction scenario that properly identifies the seven phases of construction: ground clearing, site preparation, excavation, grading, building construction, paving, architectural coating, and landscaping. As detailed in Section III.E, Background (on Page III-6), of the Draft EIR, the subject property has not been used as a community garden since 2006. Court proceedings in 2005 between the City and the Libaw-Horowitz Investment Company resulted in the resolution of the case in favor of the Libaw-Horowitz Investment Company. As a result, the community garden was removed, and the property has been vacant since 2006. As of the date when the Notice of Preparation was issued on June 17, 2014, the baseline condition of the subject property is a vacant undeveloped site.

The City recognizes the prior use of the site as a community garden. However, as indicated on page VI-3 of the Draft EIR, a community garden or a parks and recreation alternative would not meet the basic objectives of the project as they would not attain the objective of providing a minimum of 480,000 square feet of light industrial space, consistent with the existing land use designation and zoning, would not provide light manufacturing jobs within 3 miles of an existing garment manufacturing labor force in the Southeast Los Angeles Community Plan Area, would not allow for development of an industrial park that is along the Alameda Corridor to take advantage of distribution efficiency opportunities, would not facilitate the ability of existing garment labor force, located in close proximity to the project site to utilize existing public transit system and other multi-modal transportation opportunities in vicinity of proposed project, would not preserve and/or redevelop the industrial sector of the Southeast Los Angeles Community Plan Area to accommodate emerging technologies, thus providing an enhanced employment base for the Community Plan Area's population, would not benefit the Southeast Los Angeles Community Plan area population as economic stimulation through employment opportunities, attracting commercial and industrial tenants to the area, and providing tax revenue for the City would not occur; therefore, community garden or parks and recreation alternatives were not carried forward for detailed evaluation in the EIR.

COMMENT NO. E7-21

II. BACKGROUND ON GLOBAL WARMING

Climate change poses enormous risks to California. Scientific literature on the impact of greenhouse gas emissions on California (and the world) is well developed. The environmental analysis for this Project must make a good faith effort at full disclosure and avoid minimizing or discounting the severity of global warming's impacts. See Guidelines § 15151; San Joaquin Raptor/Wildlife Rescue Center v. County of Stanislaus, 27 Cal.App.4th 713 (1994).

A. Greenhouse Gas Pollution and Global Warming Has a Significant Impact on the Environment

There is no longer credible scientific dispute that the climate is warming. In its most recent assessment, the Intergovernmental Panel on Climate Change ("IPCC") concluded that "[w]arming of the climate is unequivocal, as is now evident from observations of increases in global average air and ocean temperatures, widespread melting snow and ice, and rising mean sea level." (IPCC 2007a). Expressed as a

global average, surface temperatures have increased by about 0.74°C over the last hundred years, with 11 of the 12 warmest years on record having occurred in the past 12 years (IPCC 2007a). One consequence of warmer temperatures is an increased likelihood of precipitation falling as rain rather than snow, leading to increased rains, reduced snowpacks, and consequently diminished water resources in summer, when they are most needed (IPCC 2007a). In September 2007, Arctic sea ice plummeted to a record-low level not anticipated by most climate models until 2050, leading scientists to predict that the Arctic could be ice-free in summer by 2030 (National Snow & Ice Data Center 2007). As stated by Jay Zwally, a climate expert at NASA, "the Arctic is often cited as the canary in the coal mine for climate warming. Now as a sign of climate warming the canary has died" (Kolbert 2007). Other observed consequences of the warming climate include sea level rise, increased frequency of droughts, floods, and heat waves and substantial increases in the duration and intensity of hurricanes (IPCC 2007a).

The IPCC now states with "very high confidence" that most of the warming observed over the past 50 years is the result of human generation of greenhouse gases, including carbon dioxide, methane, and nitrous oxide (IPCC 2007a). The rapid warming observed since the1970s has occurred in a period when the increase in greenhouse gases has dominated over all other factors (IPCC 2007a). The largest known contribution to global warming is from carbon dioxide (IPCC 2007a). Fossil fuel combustion is responsible for more than 75% of human caused carbon dioxide emissions with the remainder due to land-use change (primarily deforestation) (IPCC 2007a). The global atmospheric concentration of carbon dioxide has increased from a pre-industrial value of about 280 parts per million (ppm) to 379 ppm in 2005, a level that has not been exceeded during the past 650,000 years (during which carbon dioxide concentrations remained between 180 and 300 ppm) and probably during the last 20 million years (IPCC 2007a; Canadell et al. 2007). In 2006, carbon dioxide concentrations reached a new high of 381.2 ppm (World Metrological Organization 2007). As greenhouse gas concentrations increase, more heat reflected from the earth's surface is absorbed by these greenhouse gases and radiated back into the atmosphere and to the earth's surface. Consequently, the higher the level of greenhouse gas concentrations, the larger the degree of warming experienced.

At current growth rates and continued reliance on fossil fuels, atmospheric concentrations of carbon dioxide would likely exceed 1,000 ppm by the end of the century, resulting in an average global temperature increase of more than 5°C (United Nations Foundation & Sigma Xl2007). This is equivalent to the change in temperature since the last ice age - an era in which Europe and North America was under more than one kilometer of ice (United Nations Foundation & Sigma XI 2007). The growing consensus among climate scientists is that the threshold for dangerous climate change, whereupon a potential "tipping point" is reached and ecological changes become dramatically more rapid and out of control, is estimated at a temperature increase of around 2°C from pre-industrial levels, or an atmospheric concentration of carbon dioxide of approximately 450 ppm (United Nations Foundation & Sigma XI 2007;IPCC 2007c). In 2006, Dr. James E. Hansen, Director of the NASA Goddard Institute for Space Studies, and NASA's top climate scientist, stated: "In my opinion there is no significant doubt(probability> 99%) that . .. additional global warming of 2°C would push the earth beyond the tipping point and cause dramatic climate impacts including eventual sea level rise of at least several meters, extermination of a substantial fraction of the animal and plant species on the planet, and major regional climate disruptions" (Hansen et al. 2006). More recently however, given the recent unpredicted and extreme rate of loss of arctic ice observed in 2007, Dr. Hansen concluded that "the safe upper limit for atmospheric C02 is no more than 350 ppm" (McKibben2007). Moreover, according to Hansen, just 10 more years of "business-as-usual" global emissions will make it difficult, if not impossible, to keep atmospheric concentrations of greenhouse gases at levels necessary to avoid a temperature increase above 2°C (Hansen et al.2007).

Keeping the climate within the 2°C threshold requires significant reductions in the world's greenhouse gas emissions. To reach this objective, it is estimated that developed countries would have to target an

emissions peak between 2012 and 2015, with 30 percent cuts by 2020 and 80 percent cuts from 1990 levels by 2050 (United Nations Foundation & Sigma XI2007). In recognition of need for immediate action, California has committed itself though Executive Order S-3-05 and the California Global to reduce the state's emissions to 1990 levels by 2020 and by 80% reductions from 1990 levels by 2050. Ca. Health & Safety Code§ 38550; Cal. Executive Order S-3-05 (2005).

The costs of taking no action to reduce greenhouse gas emissions far outweigh the costs of stabilizing emissions. The Stern Review of the Economics of Climate Change, a comprehensive report commissioned by the British government, recently concluded that allowing current emissions trajectories to continue unabated would eventually cost the global economy between 5 to 20 percent of GDP each year within a decade, or up to $7 trillion, and warned that these figures should be considered conservative estimates (Stern 2006). By contrast, measures to mitigate global warming by reducing emissions were estimated to cost about one percent of global GDP each year~ and could save the world up to $2.5 trillion per year (Stem2006). The Stem Report determined that if no action is taken to control greenhouse gas emissions, each ton of CO_2 emitted causes damage worth at least $85 (Stem 2006).

B. Impacts to California from Global Warming

The California Climate Change Center ("CCCC') has evaluated the present and future impacts of climate change to California and the project area in research sponsored by the California Energy Commission and the California Environmental Protection Agency (Cayan et al. 2007). The severity of the impacts facing California is directly tied to atmospheric concentrations of greenhouse gases (Cayan et al. 2007; Hayhoe et al. 2004). According to the CCCC aggressive action to cut greenhouse gas emissions today can limit impacts, such as loss of the Sierra snow pack to 30%, while a business-as-usual approach could result in as much as 90% loss of the snowpack by the end of the century. As aptly noted in a report commissioned by the California EPA:

Because most global warming emissions remain in the atmosphere for decades or centuries, the choices we make today will greatly influence the climate our children and grandchildren inherit. The quality of life they experience will depend on if and how rapidly California and the rest of the world reduce greenhouse gas emissions (Cayan et al.2007).

Some of the types of impacts to California and estimated ranges of severity - in large part dependent on the extent to which emissions are reduced- are summarized as follows:

- A 30 to 90 percent reduction of the Sierra snowpack during the next 100 years, including earlier melting and runoff.
- An increase in water temperatures at least commensurate with the increase in air temperatures.
- A 6 to 30 inch rise in sea level, before increased melt rates from the dynamical properties of ice-sheet melting are taken into account.
- An increase in the intensity of storms, the amount of precipitation and the proportion of precipitation as rain versus snow.
- Profound impacts to ecosystem and species, including changes in the timing of life events, shifts in range, and community abundance shifts. Depending on the timing and interaction of these impacts, they can be catastrophic.
- A 200 to 400 percent increase in the number of heat wave days in major urban centers.
- An increase in the number of days meteorologically conducive to ozone (O_3) formation.
- A 55 percent increase in the expected risk of wildfires (Cayan et al. 2007).

By providing details as to the ranges of proposed impacts, and indicating that the higher-range of impact estimates are projected if greenhouse gas emissions continue to increase under a "business as usual" scenario, decision-makers and the public will be better informed of the magnitude of the climate crisis and the urgency with which it must be addressed.

Finally, the MND should also include a brief discussion of other laws to address climate change, including California's mandate to reduce emissions to 1990 levels by 2020 and goal of further reducing emissions to 80% below 1990 levels by 2050. Achievement of state mandated emissions reductions will be severely impeded if agencies across the state continue to approve *new* projects without incorporating measures to reduce the added emissions created by these

RESPONSE NO. E7-21

The concerns expressed by the Center for Biological Diversity regarding climate change regulations are addressed in the Draft EIR for the proposed project. Federal, state, and regional level regulations are described in Section IV.D *Greenhouse Gas Emissions* of the Draft EIR, specifically pages IV.D-2 through IV.D-6. This section is inclusive of Executive Order S-3-05 to reduce greenhouse gas emissions to 1990 levels by 2020 and 80% below 1990 levels by 2050. The CalEEMod 2013.2.2 was used to calculate direct, indirect and cumulative GHG emissions. Based on emissions modeling, unmitigated construction emissions equal approximately 643.22 metric tons of CO_{2e}. Operational emissions equal approximately 2,090.25 metric tons of CO_{2e} per year. From the results of the model, no mitigation measures were required since greenhouse gas emissions were below the threshold of 25,000 metric tons/year set by the California Air Resources Board.

The City acknowledges the scientific evidence that the climate is warming, as detailed in the IPCC Fifth Assessment Report. The resulting impacts from climate change include, but are not limited to, declining Arctic sea ice, reduced snowpack, sea level rise, and increased frequency and duration of extreme weather events. The City understands the importance of the 2 degrees Celsius threshold as a tipping point into dramatic climatic impacts. In translating this 2 degrees Celsius threshold into real terms, Executive Order S-3-05 was set to reduce greenhouse gas emissions to 80% below 1990 levels. This regulation and other pertinent GHG regulations are listed in pages IV.D-2 through IV.D-6. Particularly within California, the City recognizes that a business-as-usual approach means that California could face up to a 90 percent reduction in Sierra snowpack, increase in air and water temperatures, 6-30 inch rise in sea level on the California coast, increase in storms, impacts to ecosystems, double to quadruple heat wave days, increase in ozone, and higher wildfire risks. While the proposed project was calculated to contribute approximately 643 metric tons CO_{2e}/year in the construction phase and approximately 2091 metric tons of CO_{2e}/year in the operational phase, this is well below the 25,000 metric tons/year threshold set by the California Air Resources Board. The proposed project would have a less than significant impact on GHG emissions and be consistent with applicable plans, policies, or regulations adopted for the purpose of reducing the emissions of GHGs. These plans include LAGBC, AB 32, the SCAG RCP, the City of Los Angeles General Plan, and the Los Angeles Climate Action Plan.

COMMENT NO. E7-22

The first step in determining a project's global warming pollution impact is to complete a full inventory of all emissions sources that contribute to global warming. In conducting such an inventory, all phases of the proposed project must be considered. *See* 14 Cal. Code Regs. § 15126. The greenhouse gas inventory for a project must include a complete analysis of all of a project's substantial sources of greenhouse gas emissions, from building materials and construction emissions to operational energy use, vehicle trips, water supply and waste disposal. Importantly, OPR has also stated that "lead agencies should make a good-faith effort, based on available information, to calculate, model, or estimate the amount of C02 and

other GHG emissions from a project, including the emissions associated with vehicular traffic, energy consumption, water usage and construction activities." (California Office of Planning and Research 2008). Contrary to OPR Guidance, the MND fails to quantify emissions from any of these sources.

RESPONSE NO. E7-22

The concerns expressed by the Center for Biological Diversity regarding the need for an adequate characterization of emission sources and analysis of project level contributions have been addressed in the Draft EIR. The inventory is listed in Table IV.D-2 State of California GHG Emissions by Sector of Section IV.D *Greenhouse Gas Emissions* of the Draft EIR. Unmitigated project level emissions are summarized in Table IV.D-3 *Unmitigated CO_2 and CO_{2e} Emissions* of Section IV.D *Greenhouse Gas Emissions*. The methodology is described on page IV.D-7 and IV.D-8. This methodology and inventory is consistent with the OPR guidelines as cited by the comment letter ("Lead agencies should make a good faith effort….")

Direct and indirect emissions have been calculated for the proposed project. Because GHG emissions are global in nature, it is difficult to attribute a specific increase in emissions to a particular project. For the proposed project, the emissions modeling was conducted in CalEEMod2013.2.2, which is a statewide model, accepted by SCAQMD, to calculate air quality and GHG emissions for construction and operations in land use projects. The model incorporates multiple components of the proposed project including the construction scenario with its heavy construction equipment, landscaping, mobile trips (car and truck), architectural coatings, and potential energy and water efficiency savings. Based on emissions modeling, unmitigated construction emissions equal approximately 643.22 metric tons of CO_{2e}. Operational emissions equal approximately 2,090.25 metric tons of CO_{2e} per year. The operational GHG emissions can be attributed to mobile sources associated with the proposed project's approximate 353,375 square feet of warehouse space. In the absence of regional thresholds adopted for GHG emissions, the CARB suggested threshold of 25,000 metric tons of CO_{2e} per year was utilized for the quantitative analysis of GHG emissions. Both construction and operational emissions are well below this threshold.

COMMENT NO. E7-23

A greenhouse gas inventory for the project must include the project's direct and indirect greenhouse gas emissions. *See* 14 Cal. Code Regs § 15358(a)(l) (Indirect or secondary effects may include effects related to induced changes in the pattern of land use, population density, or growth rate, and related effects on air and water and other natural systems, including ecosystems.). Consequently, a complete inventory of a project's emissions should include, at minimum, an estimate of emissions from the following:

- Fugitive emissions of greenhouses gases, such as methane, from the proposed project;
- Emissions during construction from vehicles and machinery;
- Manufacturing and transport of building materials;
- Electricity generation and transmission for the heating, cooling, lighting, and other energy demands of the project;
- Water supply and transportation to the project;
- Vehicle trips and transportation emissions generated by the project;
- Wastewater and solid waste storage or disposal, including transport where applicable; and
- Outsourced activities and contracting.

RESPONSE NO. E7-23

Your comment on the greenhouse gas inventory for the project has been noted. The project's GHG

emissions calculation included mobile sources (passenger, truck, and heavy construction equipment trips), energy sources (electricity and other energy demands), and area (gas appliances, stoves, fireplaces) sources. These project impacts were captured in the CalEEMod 2013.2.2 and used to calculate the direct, indirect, and cumulative emissions.

COMMENT NO. E7-24

Methodologies are readily available to inventory the emissions from the proposed project. In its recent white paper, CEQA & Climate Change, Evaluating and Addressing Greenhouse Gas Emissions from Projects Subject to the California Environmental Quality Act (Jan. 2008), the California Air Pollution Control Officers Association (CAPCOA) sets forth methodologies for analyzing greenhouse gas pollution (CAPCOA 2008) (See Table 1. CEQA and Greenhouse Gas Emissions Methodologies). In its Guidance, OPR also provides references to methodologies to quantify greenhouse gas emissions. In addition to the methodologies set forth by CAPCOA and OPR, ICLEI's Clean Air/Climate Protection (CACP) software allows cities to calculate emissions reductions, track and quantify emission outputs, and develop emissions scenarios to inform the planning process. As noted in the ICLEI Climate Action Handbook, "Expertise in climate science is not necessary" to conduct an emissions inventory and compare this inventory against a forecast year (ICLEI). "A wide range of government staff members, from public works to environment and facilities departments, can conduct an inventory" (ICLEI). ICLEI provides technical assistance and training to local government using the CACP software.

RESPONSE NO. E7-24

The City acknowledges the other methodologies by CAPCOA and OPR to quantify an emissions inventory. The methodology and assumptions used in the emission model is described on page IV.D-7 and IV.D-8 of the DEIR. This methodology and inventory is consistent with OPR's amendments to the CEQA Guidelines pursuant to SB 97 and CAPCOA's Quantifying Greenhouse Gas Mitigation Measures document.[13].

COMMENT NO. E7-25

It is incumbent on the City "disclose all it can" about project impacts and educate itself on methodologies that are available to measure project emissions. *Berkeley Keep Jets Over the Bay Comm. v. Board of Port Comm 'rs ('Berkeley Jets"),* 91 Cal. App. 4th 1344, 1370 (2001). Without a complete inventory, the MND cannot adequately inform the public and decisionmakers about the Project's impacts. Similarly, without a complete inventory and analysis of greenhouse gas emissions that will result from the project, there is simply no way that the MND can then adequately discuss avoidance, and mitigation measures to reduce those impacts.

RESPONSE NO. E7-25

The concerns expressed by the Center for Biological Diversity regarding the need for full disclosure regarding impacts on greenhouse gas emissions have been addressed in the Draft EIR. As mentioned in Response to Comment No. E7-22, the Draft EIR includes an inventory and analysis of greenhouse gas emissions. The CalEEMod 2013.2.2 was used to calculate direct, indirect and cumulative emissions. From the results of the model, no mitigation measures were required since greenhouse gas emissions were below the threshold of 25,000 metric tons/year set by the California Air Resources Board. More detailed information on the GHG analysis can be found in the Impact Analysis portion (pages IV.D-9 to IV.D-11)

[13] California Air Pollution Control Officers Association. August 2010. Available online at: http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf

of Section IV.D *Greenhouse Gas Emissions* of the Draft EIR.

COMMENT NO. E7-26

As part of its analysis of global warming impacts, the MND must also address black carbon, an important short-lived pollutant that contributes to global and regional warming. Black carbon is produced by incomplete combustion and is the black component of soot. Although combustion produces a mixture of black carbon and organic carbon, the proportion of black carbon produced by burning fossil fuels, such as diesel, is much greater than that produced by burning biomass.

Black carbon heats the atmosphere through a variety of mechanisms. First, it is highly efficient at absorbing solar radiation and in tum heating the surrounding atmosphere. Second, atmospheric black carbon absorbs reflected radiation from the surface. Third, when black carbon lands on snow and ice, it reduces the reflectivity of the white surface which causes increased atmospheric warming as well as accelerates the rate of snow and ice melt. Fourth, it evaporates low clouds. Notably, black carbon is often complexed with other aerosols such as sulfates, which greatly increases its heating potential. (Ra1nanathan & Carmichael2008; Jacobson 2001).

Due to black carbon's short atmospheric life span and high global warming potential, decreasing black carbon emissions offers an opportunity to mitigate the effects of global warming trends in the short te1m. (Ramanathan & Carmichael 2008). Black carbon is considered a 'short-lived pollutant' (SLP) because it remains in the atmosphere for only about a week in contrast to carbon dioxide, which remains in the atmosphere for over 100 years. Furthermore, the global warming potential of black carbon is approximately 760 times greater than that of carbon dioxide over 100 years (Reddy & Boucher 2007) and approximately 2200 times greater over 20 years (Bond & Sun 2005). It is estimated that black carbon is the second greatest contributor to global warming behind carbon dioxide. (Ramanathan & Cannichael 2008).

Unlike traditional greenhouse gases, which become relatively uniformly distributed and mixed throughout the Earth's atmosphere, black carbon exerts a regional influence. The impacts of black carbon on a regional level include both atmospheric heating, as discussed above, and hydrological changes. Hydrological changes occur due to alterations in cloud formation and heat gradients. (Id.). For instance, aerosol pollution has been linked to decreases in the summer monsoon season in tropical areas as well as the drought in the Sahel region of Africa. (Id.). California is an area of particular concern because of the drought-fire cycle. The more drought conditions prevail, the more forest fires bum, and the forest fires in tum emit massive quantities of black and organic carbon. The release of these aerosols intensifies the drought effect.

Another impact of black carbon is accelerated snowmelt; for instance, black carbon is likely contributing to the retreat of Himalayan glaciers and the resulting water shortage in areas of Asia. (Id.). When black carbon settles on snow, it makes the snow darker so that it absorbs more solar radiation. This directly leads to snow melt. In addition, local atmospheric heating due to black carbon increases the melting rate. These same effects may well be operating on the Sierra Nevada, which would reduce water availability throughout California at crucial times of the year. These localized impacts could also be contributing to a decreased snow pack and earlier snow melt for the San Gabriel, San Bernardino, and San Jacinto mountains.

Black carbon is also detrimental to human health. Black carbon has been linked to a variety of circulatory diseases. One study found an increased mortality rate was correlated with exposure to black carbon. (Maynard 2007). The same is true for heart attacks. (Tonne 2007). Another study found that residential

black carbon exposure. was associated with increased rates of infant mortality due to pneumonia, increased chronic bronchitis, and increased blood pressure. (Schwartz 2007).

In developed countries, diesel burning is the main source of black carbon. Diesel emissions include a number of compounds such as sulfur oxides, nitrogen oxides, hydrocarbons, carbon monoxide, and particulate matter. Diesel particulate matter is approximately 75% elemental carbon. (EPA 2002 Diesel Health Assessment) The proposed project will require the use of diesel-powered heavy duty trucks, construction equipment, and yard/warehouse equipment. Thus, it is crucial that black carbon be addressed as part of the environmental review for the Project.

RESPONSE NO. E7-26

The City has noted the request to consider black carbon emissions separate from particulate matter emissions. The City acknowledges that black carbon originates from incomplete combustion and burning of fossil fuels. Black carbon has a short atmospheric lifespan, yet a very high global warming potential so eliminating or reducing black carbon can have a very strong short term effect on the climate. The City also recognizes the impact of black carbon on public health and accelerated snow melt. Black carbon is capable of having a noticeable regional impact on atmospheric heating and hydrological changes unlike other traditional greenhouse gases. Forest fires can be a major contributor to black carbon and is especially of concern during the drought.

Black carbon is not considered one of the six main criteria air pollutants by the California Air Resources Board or the South Coast Air Quality Management District (SCAQMD). Therefore, there is no standard or threshold for black carbon specifically. Section IV.B *Air Quality* of the Draft EIR does not quantify the black carbon emissions. The impacts of black carbon are considered cumulatively in the analysis of $PM_{2.5}$ and PM_{10} because black carbon is a component of diesel particulate matter emissions, which are quantified in Table IV.B-8 and Table IV.B-9 in Section IV.B *Air Quality* of the Draft EIR. Mobile sources such as diesel fueled vehicles are a major source of black carbon and particulate matter emissions. Contributions from heavy duty trucks and construction equipment are considered in the emission modeling. The only criteria pollutant above the SCAQMD significance threshold is PM_{10} during the construction phase. All other pollutants are below their appropriate thresholds. PM_{10} emissions are mitigated through Mitigation Measures Air-1, Air-2, and Air-3. Please review Section IV.B *Air Quality* for a more detailed impact analysis of these types of emissions from the proposed project.

In addition, in response to concerns expressed by the public regarding potential human health hazards from diesel trucks during the operational phase of the project, a human health risk assessment (a technical study) was prepared for the project.[14] The proposed project was determined to result in a less than significant impact to human health from diesel emissions from trucks during the operational phase of the project; thus the consideration of mitigation measures and alternatives to reduce the risks on human health from diesel trucks and equipment used during the operational phase of the project is not warranted. This analysis is covered on page IV.B-22 of the Draft EIR. It states that the maximum potential cancer risk is 0.3 in a million, which is less than 3 percent of the cancer threshold. This is much less than the ten in one million maximum individual cancer risk (MICR) threshold set by SCAQMD Rule 1401.

COMMENT NO. E7-27

[14] Kleinfelder, Inc.. Human Health Screening Evaluation Former Horowitz Property (Bounded By Martin Luther King, Jr Boulevard, Alameda Street, East 41st Street, And Long Beach Avenue) Los Angeles, California. July 15, 2014. Volume VI, Appendix VIII of Draft EIR.

Particulate matter (PM) refers to the particles that make up atmospheric aerosols. The primary constituents of PM are sulfates, nitrates, and carbon compounds. Sulfates and nitrates form in the atmosphere from the chemical reaction of sulfur and nitrogen dioxides. These may often be present as ammonium sulfate or nitrate salts. Carbon compounds may be directly emitted, e.g. black carbon emitted from combustion, or may fonn in the atmosphere from other organic vapors, e.g. oxidation of volatile organic compounds.

Because PM can be reduced through mitigation of other constituents of PM than black carbon, it is essential that black carbon emission reduction strategies be considered independently from PM reductions. The proportions of the constituents of PM vary over time and by location. (See EPA 2004 Particle Pollution Report). According to a recent series of surveys conducted at various U.S. cities under the EPA's "Supersite" program, black carbon was often only about 10% of total measured $PM_{2.5}$.

RESPONSE NO. E7-27

Your definition of particulate matter and your comment to include black carbon reduction strategies in the analysis have been noted. Please refer to Response to Comment No. E7-26 for more information on black carbon. Black carbon is not considered one of the six main criteria air pollutants by the CARB or SCAQMD so there is no standard or threshold for black carbon specifically. Section IV.B *Air Quality* of the Draft EIR does not quantify the black carbon emissions directly. The impacts of black carbon are considered cumulatively in the analysis of $PM_{2.5}$ and PM_{10} because black carbon is a component of diesel particulate matter emissions, which are quantified in Table IV.B-8 and Table IV.B-9 in Section IV.B *Air Quality* of the Draft EIR. The consideration of mitigation measures and alternatives is required to address significant impacts. However, the proposed project was determined to not result in significant impacts to human health related to diesel emissions, inclusive of black carbon; therefore, the consideration of mitigation measures and alternatives is not warranted.

COMMENT NO. E7-28

In contrast to total $PM_{2.5}$, diesel PM is composed largely of black carbon. Nonetheless, some diesel PM reduction strategies do not affect black carbon. For instance, diesel oxidation catalysts can reduce diesel PM emissions as a whole by approximately 20 to 40%, yet they do not decrease black carbon emissions. (Walker 2004). In addition, while low-sulfur fuel will reduce sulfate emissions, in and of itself low-sulfur fuel will not reduce black carbon. Low sulfur fuel is important because it *allows* for better technology to reduce black carbon. *(See, e.g.* 69 Fed. Reg. 38957, 38995 (June 29, 2004)). Yet those reductions can only occur once the technology has been implemented.

RESPONSE NO. E7-28

The City has noted that not all diesel PM reduction strategies affect black carbon. The impacts of black carbon are considered cumulatively in the analysis of $PM_{2.5}$ and PM_{10} because black carbon is a component of diesel particulate matter emissions, which are quantified in Table IV.B-8 and Table IV.B-9 in Section IV.B *Air Quality* of the Draft EIR. To reduce $PM_{2.5}$ and PM_{10}, the following mitigation measures are proposed: Air-1, which will apply soil stabilizers on unpaved roads, and Air-2, which will water exposed areas three times a day.

COMMENT NO. E7-29

Like greenhouse gases, black carbon emissions from various types of engines and activities can be estimated through numerical calculations. (Bond 2004). Thus, there is no reason why black carbon can reasonably be omitted from these estimates.

The estimated black carbon emissions from the project can be inventoried similarly to other greenhouse gas emissions:

- Estimate the mass of diesel fuel consumed by each type of diesel engine, e.g. ship, machinery, truck, construction equipment, and locomotive.
- Calculate a black carbon emission factor (EF) using reference values available in the literature. For instance, Bond and colleagues provide an equation for "EFBc" from various types of diesel engines that takes into account 4 different factors.
- Multiply the emission factor times the mass of diesel (in kilograms) used for each engine type. This will provide the grams of black carbon emitted by that engine type.
- Sum all black carbon emissions from each engine category to obtain total black carbon emissions from the project.

After obtaining the total black carbon emissions from the project, the relative global warming impact of the emissions can be compared to other global warming pollutants. Carbon dioxide-equivalent values can be obtained by multiplying total black carbon emissions (in kilograms) from the project by the global warming potential (GWP) for black carbon. Although there is some variation in estimated GWP values, representative black carbon GWP values are: 760 over 100 years or 2200 over 20 years (Bond & Sun 2005).

RESPONSE NO. E7-29

Your recommendation on how to quantify black carbon emissions has been noted. Black carbon is not considered one of the six main criteria air pollutants by the CARB or SCAQMD so there is no standard or threshold requiring a separate calculation for black carbon specifically. The impacts from black carbon have been noted and its effects are considered cumulatively in the analysis of $PM_{2.5}$ and PM_{10}.

COMMENT NO. E7-30

After fully quantifying Project emissions, the MND must determine the cumulative significance of the Project's greenhouse gas pollution. As the lead agency, CEQA requires the City to determine the significance of the Project's emissions with or without established significance thresholds.

Guidelines § 15064. Importantly, a universally adopted methodology is *not* necessary to analyze project impacts. *Berkeley Keep Jets,* 91 Cal. App. 4th at 1370 ("the fact that a single methodology does not exist ... requires the [respondent] to do the necessary work to educate itself about the different methodologies that *are* available."). As OPR has noted, "[l]ead agencies should not dismiss a proposed project's direct and/or indirect climate change impacts without careful consideration, supported by substantial evidence." (Office of Planning and Research 2008 at 6.) Here, the Project's circular reasoning that emissions would simply be generated elsewhere does not constitute substantial evidence.

To the contrary, the greenhouse gas emissions generated by a project of this size and scope will have a clearly significant cumulative impact. An impact is considered significant where its "effects are individually limited but cumulatively considerable." Guidelines § 15065(a)(3). Climate change is the

classic example of a cumulative effects problem; emissions from numerous sources combine to create the most pressing environmental and societal problem of out time. *Ctr. for Biological Diversity v. Diversity v. NHTSA,* 508 F.3d 508, 550 (9th Cir. 2007), ("the impact of greenhouse gas emissions on climate change is precisely the kind of cumulative impacts analysis that NEPA requires agencies to conduct."); *Kings County Farm Bureau v. City of Hanford,* 221 Cal. App. 3d 692, 720 (1990) ("Perhaps the best example [of a cumulative impact] is air pollution, where thousands of relatively small sources of pollution cause a serious environmental health problem."). While a particular project's greenhouse gas emissions represent a fraction of California's total emissions, courts have flatly rejected the notion that the incremental impact of a project is not cumulatively considerable because it is so small that it would make only a *de minimis* contribution to the problem as a whole. *Communities for a Better Env 't v. California Resources Agency.* 103 Cal. App. 4th 98, 117 (2002); *see also Kings County Farm Bureau v. City of Hanford,* 221 Cal. App. 3d 692, 720 (1990) ("Perhaps the best exmnple [of a cumulative impact] is air pollution, where thousands of relatively small sources of pollution cause a serious environmental health problem.").

Under CEQA, "[t]he determination of whether a project may have a significant effect on the environment calls for careful judgment on the part of the public agency involved, based to the extent possible *on scientific and factual data."* CEQA Guidelines § 15064(b) (emphasis added). Accordingly, a significance threshold for greenhouse gases must reflect the grave threats posed by the cumulative impact of additional new sources of emissions into an environment where deep reductions from existing emission levels are necessary to avert the worst consequences of global warming. *See Communities for Better Env 't v. California Resources Agency,* 103 Cal. App. 4th 98, 120 (2002) ("the greater the existing environmental proble1ns are, the lower the threshold for treating a project's contribution to cumulative impacts as significant.").

RESPONSE NO. E7-30

The City has noted the request for a cumulative significance determination for the project's greenhouse gas emissions. Section IV.D *Greenhouse Gas Emissions* of the Draft EIR covers cumulative impacts and determines that the project's cumulative greenhouse gas emissions would be considered less than significant (Please see page IV.D-12 of the Draft EIR). The proposed project's GHG emissions would not be considered substantial when compared to statewide GHG emissions. Even though the project will emit GHGs, emissions of GHGs by a single project is not by itself an adverse environmental impact. This determination is based on the consistency of the proposed project with the strategies, goals, and policies of adopted plans that govern the reduction of per capita greenhouse gas emissions to meet targets established by AB32 and Executive Order S-03-05, including the Southern California Association of Governments (SCAG) 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), the SCAQMD Air Quality Management Plan, and the City of Los Angeles General Plan and Southeast Los Angeles Community Plan. In particular, the GreenLA is the city's Climate Action Plan, which sets a goal of reducing the City's emissions by 35 percent below 1990 levels by the year 2030. See Page IV.D-5 in the Draft EIR. This proposed project also must adhere to the California Green Building Standards Code (2010 CALGreen Code), which contains requirements for optimizing energy, water, and waste reductions in buildings. See Page IV.D-4 in the Draft EIR. Furthermore, the proposed project is relocating current operations to a centralized location along the Alameda Corridor with immediate access to rail lines and major highways, which minimizes mobile emissions that are typical of a project of this type.

COMMENT NO. E7-31

The failure to immediately and significantly reduce emissions from existing levels will result in

devastating consequences for the economy, public health, natural resources, and the environment. Based on the scientific and factual data, thresholds that are not highly effective at reducing e1nissions are inadequate in the face of the profound threats posed by global warming. Moreover, CEQA requires that a lead agency must "still consider any fair argument that a certain environmental effect may be significant" even where a project complies with a regulatory threshold. *Protect the Historic Amador Waterways v. Amador Water Agency,* 116 Cal. App. 4th 1099, 1109 (2004). CAPCOA provides various means by which a lead agency can determine the significance of project emissions (CAPCOA 2008). Reliance on a threshold that is not highly effective at reducing greenhouse gas emissions or is inconsistent with mandated emission reductions leaves projects open to legal challenge under the fair argument standard because there is a fair argument that application of a threshold with limited effectiveness at reducing emissions would still result in environmental effects, Therefore, thresholds that are not highly effective in reducing emissions or are inconsistent with mandated emissions reductions still create a significant impact.

RESPONSE NO. E7-31

Your comment on the need to use highly effective thresholds when considering GHG impacts has been noted. The effectiveness of the thresholds in moving towards attaining per capita reductions in greenhouse gas emissions is demonstrated by the data contained in the SCAG 2012-2035 RTP/SCS that shows the six-County SCAG region, including Los Angeles trending toward achieving per capita reductions in GHG established by AB 32. The proposed project's construction and operational emissions of greenhouse gasses are not projected to exceed the thresholds established by the California Air Pollution Control Officers Association (CAPCOA) or the California Air Resources Board (CARB) (please see page IV.D-10 pf the Draft EIR). The GHG mandatory reporting threshold is 25,000 metric tons of CO_{2e} per year for specified stationary sources.

COMMENT NO. E7-32

Under CAPCOA' s own analysis, the only two thresholds that are highly effective at reducing emissions and highly consistent with AB 32 and Executive Order S-3-05 are a threshold of zero or a quantitative threshold designed to capture 90 percent or more of likely future discretionary projects (a 900-ton C02 Eq threshold). (CAPCOA 2008 at 56-57.) According to CAPCOA, 900 tons is roughly the equivalent of the emissions generated by 50 homes or 30,000 square feet of commercial space. (ld. at 43.) While the emissions from these projects might ordinarily seem minor enough to ignore, the challenges posed by climate change are far from ordinary. Given the recent extreme losses in arctic sea ice, scientists at the National Snow and Ice Data Center have concluded that "the observed changes in the arctic indicate that this feedback loop is now starting to take hold."9 Even the ambitious emissions reduction targets set by Executive Order S-3-05 in 2005, which were consistent with contemporaneous science indicating that reductions of 80% below 1990 levels by developed countries were sufficient to stabilize the climate, 10 are now believed to be insufficient. Based on the alarming and unpredicted rate of loss of Arctic sea ice and other recent climate change observations, leading scientists now state that "humanity must aim for an even lower level of GHGs."

As our current scientific understanding now calls for even greater reductions and indicates that we already may have passed a climactic tipping point, the City should apply a threshold of zero in order to ensure that new projects do not have a cumulatively significant impact on global warming. As noted by the Ninth Circuit in *Center for Biological Diversity v. Nat'l Highway Traffic Safety Admin.:*

> [W]e cannot afford to ignore even modest contributions to global warming. If global warming is the result of the cumulative contributions of myriad sources, any one modest in itself, is there not a danger of losing the forest by closing our eyes to the felling of the individual trees? 508 F .3d

508, 550 (9th Cir. 2007). Accordingly, the City must unequivocally consider Project emissions to be a potentially significant impact.

RESPONSE NO. E7-32

The City has noted that even small projects with minor contributions to global warming can have a cumulatively adverse effect on climate change. Section IV.D *Greenhouse Gas Emissions* of the Draft EIR, provides a thorough evaluation of the impacts of both the construction and operational phases of the project on greenhouse gas emission, consistent with the guidance established in Appendix G of the State CEQA Guidelines. The analysis is consistent with OPR's amendments to the CEQA Guidelines pursuant to SB 97 and CAPCOA's Quantifying Greenhouse Gas Mitigation Measures document [15]. Please refer to the Air Quality and Greenhouse Gas Emissions Technical Report (Appendix IV in Volume IV of the Draft EIR) for further detail. The City has evaluated the impacts of the project on greenhouse gas emissions in light of the goals and policies established in plans adopted by SCAG, the SCAQMD, and the City of Los Angeles to achieve the per capita reductions in greenhouse gas emissions established by AB 32. Alternatives and mitigation measures need to be directly proportional to the impacts of the project. The Center for Biological Diversity letter recommends consideration of a threshold of zero emissions for all future projects. However, the City has not adopted such a criteria, and it would be arbitrary to apply such a standard to the proposed project that is consistent with the proposed land use and zoning designations, complies with the California Green Building Standards and the Los Angeles Green Building Code, thresholds established by the California Air Resources Board (CARB), and the goals and policies of adopted plans to achieve per capita reductions in greenhouse gas emissions.

COMMENT NO. E7-33

The MND's failure to recognize the cumulatively significant impacts from the project directly leads to the failure to consider feasible mitigation measures and alternatives to reduce this cumulatively significant impact. CEQA requires agencies to adopt feasible mitigation measures or feasible environmentally superior alternatives in order to substantially lessen or avoid the otherwise significant environmental impacts of a proposed project. Pub. Res. Code §§21002, 21081(a); CEQA Guidelines §§ 15002(a)(3), 15021(a)(2), 15091(a)(1). In the present case the MND erroneously concludes, without substantial evidence, that the Project's improperly narrowed contribution of greenhouse gas emissions is not significant. Because it does not find the emissions significant, the MND fails to require the adoption of feasible mitigation measures or alternatives.CEQA requires that agencies "mitigate or avoid the significant effects on the environment of projects that it carries out or approves whenever it is feasible to do so." Pub. Res. Code § 21002.1 (b). Mitigation of a project's significant impacts is one of the "most important" functions of CEQA. *Sierra Club v. Gilroy City Council,* 222 Cal.App.3d 30, 41 (1990). Therefore, it is the "policy of the state that public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures which will avoid or substantially lessen the significant environmental effects of such projects." Pub. Res. Code § 21002. Importantly, mitigation measures must be "fully enforceable through permit conditions, agreements, or other measures" so "that feasible mitigation measures will actually be implemented as a condition of development." *Federation of Hillside & Canyon Ass 'ns v. City of Los Angeles,* 83 Cal.App.4th 1252, 1261 (2000).

RESPONSE NO. E7-33

Section IV.D *Greenhouse Gas Emissions* of the Draft EIR, provides a thorough evaluation of the impacts of both the construction and operational phases of the project on greenhouse gas emission, consistent with

[15] California Air Pollution Control Officers Association. August 2010. Available online at: http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf

the guidance established in Appendix G of the State CEQA Guidelines. Emissions are expected from mobile sources (personal vehicle and truck trips) and the construction of the proposed project's approximately 353,375 square feet of warehouse space. As a result of the analysis of greenhouse gas emissions, the Draft EIR determined that implementation of the proposed project would not be expected to result in significant direct, indirect, or cumulative impacts to greenhouse gas emissions because GHG emissions are not projected to exceed the GHG mandatory reporting threshold of 25,000 metric tons of CO_{2e} per year for specified stationary sources as established by CARB. See Table IV.D-3 in the Draft EIR. Therefore, the consideration of mitigation measures was not required. Please refer to the Air Quality and Greenhouse Gas Emissions Technical Report (Appendix IV in Volume IV of the Draft EIR) for further detail, and the discussion of cumulative GHG impacts on page IV.D-12 of the Draft EIR. Alternatives A, B, and C would result in fewer emissions compared to the proposed project and are discussed in further detail in Section VI. Alternatives of the Draft EIR.

COMMENT NO. E7-34

Importantly, the City should examine an alternative that reverts part of the project site back to a community garden. To the extent that the project moves forward as planned, there are many mitigation measures the City can consider, as described below. This is not an exhaustive list and the MND should explore these and all other feasible mitigation measures that will reduce the project's greenhouse gas emissions (CAPCOA 2008; California Office of the Attorney General 2008).

RESPONSE NO. E7-34

The comment advocating for a community garden has been noted. Section 15126.6 of the CEQA Guidelines requires an EIR to describe a range of reasonable alternatives to a project or to the location of a project that would feasibly attain most of the basic objectives of a project but would avoid or substantially lessen any of the significant effects of a project, and evaluate the comparative merits of the alternatives. The discussion of alternatives, however, need not be exhaustive, but rather the discussion must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. An EIR is not required to consider alternatives that are deemed "infeasible". In developing alternatives, the following factors are considered: (i) ability to meet most of the basic project objectives, (ii) feasibility, or (iii) ability to avoid or substantially lessen significant environmental impacts.

Section VI *Alternatives* of the Draft EIR considers less polluting alternatives to the proposed project. Alternative B uses clean fuel trucks and Alternative C uses reduced truck operations. The reduced truck operations alternative is the environmentally superior alternative. As indicated on page VI-3 of the Draft EIR, a community garden or a parks and recreation alternative would not meet the basic objectives of the project as they would not attain the objective of providing a minimum of 480,000 square feet of light industrial space, consistent with the existing land use designation and zoning, would not provide light manufacturing jobs within 3 miles of an existing garment manufacturing labor force in the Southeast Los Angeles Community Plan Area, would not allow for development of an industrial park that is along the Alameda Corridor to take advantage of distribution efficiency opportunities, would not facilitate the ability of existing garment labor force, located in close proximity to the project site to utilize existing public transit system and other multi-modal transportation opportunities in vicinity of proposed project, would not preserve and/or redevelop the industrial sector of the Southeast Los Angeles Community Plan Area to accommodate emerging technologies, thus providing an enhanced employment base for the Community Plan Area's population, would not benefit the Southeast Los Angeles Community Plan area population as economic stimulation through employment opportunities, attracting commercial and industrial tenants to the area, and providing tax revenue for the City would not occur; therefore, community garden or parks and recreation alternatives were not carried forward for detailed evaluation in

the EIR. These basic objectives are listed in detail on page VI-3 in Section VI. *Alternatives* of the Draft EIR.

The proposed use of the property as light manufacturing is consistent with land use planning objectives articulated in the Southeast Los Angeles Community Plan. The City of Los Angeles Southeast Los Angeles Community Plan has designated the project site as light industrial. The land use designation discourages nonindustrial uses and uses that compromise job-producing potential. Plan Goal 3 supports sufficient land for a variety of industrial uses with maximum employment opportunities, which are safe for the environment and the work force, and which have minimal adverse impacts on adjacent uses. The South East Los Angeles Community Plan further supports the retention and redevelopment of the industrial sector through Objective 3-1, Policy 3-1.1, and Objective 3-2, Policy 3-2.1:

> **Objective 3-1** To provide for existing and future industrial uses which contribute job opportunities for residents and which minimize environmental and visual impacts to the community.
>
> **Policies**
> 3-1.1 Designate lands for the continuation of existing industry and development of new industrial parks, research and development uses, light manufacturing, and similar uses which provide employment opportunities.
>
> **Objective 3-2** To retain industrial plan designations to maintain the industrial employment base for community residents and to increase it whenever possible.
>
> **Policies**
> 3-2.1 The significant, large industrially planned parcels located in predominantly industrial areas associated with the railroad transportation facilities along Alameda and in the Slauson area should be protected from development by other uses which do not support the industrial base of the community, and the City.

The Southeast Los Angeles Community Plan's open space goals and objectives support the preservation of existing open space and the development of new open space, in balance with new development, to serve the recreational, environmental, health and safety needs of the community. The objectives further note that the "Plan Map designates lands for open spaces including parklands". As noted above, the project site is in an industrial corridor adjacent to the Alameda Corridor rail line, and it is not designated for open space on the plan map. The area surrounding the proposed project site is developed almost exclusively with light and heavy industrial uses, with limited small lot single family residential homes intermixed with light/industrial warehouse uses to the south and residential areas farther to the west. The Alameda Corridor rail line is located directly to the east and runs below grade in the project area, and also includes the Southern Pacific Railroad right-of-way across South Alameda Street. The Metro Blue Line light rail is located immediately to the west of the project site. The nearest designated open space is the Ross Snyder Recreation Center, located 0.2 mile west of the proposed project site.

As discussed in the Section III.E of the EIR, pursuant to the 2003 settlement agreement between the City and The Horowitz Group, regarding the Lancer Property (proposed project site), Libaw-Horowitz pledged to dedicate approximately 2.6 acres of the property back to the City of Los Angeles Department of Recreation and Parks or to a nonprofit community organization that would use and maintain the property for recreation and park purposes. In June 2008, the City of Los Angeles circulated a Mitigated Negative Declaration to evaluate the proposed development of the property. The property owner, The Horowitz Group, served as the project applicant on behalf of a major Los Angeles-based garment manufacturer who expressed interest in purchasing the property to construct a high-ceiling warehouse facility. The 2008

proposed project would have involved developing the site with a 46-foot-high, two-story structure with subterranean parking of approximately 114,399 square feet for 306 cars. The Horowitz Group did not finalize a sale of the property to the proposed developer identified in 2008; therefore, the Horowitz Group did not seek final approval of this version of the project.

The Horowitz Group worked with the City to amend the settlement agreement to substitute a cash pledge for the dedication of the 2.6 acres. The amendment allows for development of the property consistent with the Southeast Los Angeles Community Plan and provides the City with the funds to dedicate a park in a more appropriate location than the proposed project site, which is in an industrial area, and isolated to the east and west by major rail lines. In 2011, the City Council accordingly authorized execution of a Cash Pledge Agreement whereby a payment in the amount of $3,573,365 was made to improve and provide recreational and park facilities in the vicinity of the property (see Report of the Chief Legislative Analyst, Ordinance No. 181949, and City Council Motion included in Appendix XII of the Draft EIR). As stated in the Draft EIR and summarized above, the project's cash pledge agreement will contribute to open space in the City in a more suitable location, while the project site would be developed consistent with its Community Plan designation, goals and policies, and the project objectives.

Your comment on potential mitigation measures the City can consider has been noted. Mitigation measures for the proposed project are listed in the relevant CEQA section that applies. Because there is no significant impact for GHGs, CEQA does not require consideration of GHG mitigation measures. Comments on specific mitigation measures are responded to individually as follows.

COMMENT NO. E7-35

The MND should consider mitigation measures that will ensure the planned community will use energy efficiently and conservatively. In doing so, it should analyze incorporating "green building" in the development. Green buildings are those buildings that lower energy consumption, use renewable energy, conserve water, harness natural light and ventilation, use environmentally friendly materials and minimize waste (Commission for Environmental Cooperation 2008).

Buildings create environmental impacts throughout their lifecycle, from the construction phase to their actual use to their eventual destruction (Commission for Environmental Cooperation 2008). In the United States, buildings account for 40 percent of total energy use, 68 percent of total electricity consumption, and 60 percent of total non-industrial waste (Commission for Environmental Cooperation 2008). Buildings also significantly contribute to the release of greenhouse gases. In the U.S. they account for 38 percent of total carbon dioxide emissions (Commission for Environmental Cooperation 2008). More specifically, residential buildings cause up to 1,210 megatons of carbon dioxide, while commercial building create approximately 1,020 megatons (Commission for Environmental Cooperation 2008). This is because buildings require a lot of energy for their day to day operations. Most of the coal-fired power plants - one of the biggest sources of greenhouse gas emissions - slated for development in the United States will supply buildings with the energy they need. In fact, 76 percent of the energy these plants produce will go to operating buildings in the U.S. (Commission for Environmental Cooperation 2008).

Using green building techniques, however, can substantially reduce buildings' influence in increasing greenhouse gas emissions. Green buildings help reduce the amount of energy used to light, heat, cool and operate buildings and substitute carbon-based energy sources with alternatives that do not result in greenhouse gas emissions (Commission for Environmental Cooperation 2008). Currently green buildings can reduce energy by 30 percent or more and carbon emissions by 35 percent. (Commission for Environmental Cooperation 2008). The technologies available for green building are already in wide-use and include "passive solar design, high-efficiency lighting and appliances, highly efficient ventilation and cooling systems, solar water heaters, insulation materials and techniques, high-reflectivity building

materials and multiple glazing (IPCC 2007c). Additionally, the U.S. Green Building Council (USGBC), a private, nonprofit corporation, has established a nationwide green building rating system, called Leadership in Energy and Environmental Design ("LEED"). The LEED standard supports and certifies successful green building design, construction and operations. It is one of the most widely used and recognized systems, and to obtain LEED certification from the USGBC, project architects must verify in writing that design ele1nents meet established LEED goals.

RESPONSE NO. E7-35

Your comment regarding energy conservation measures for buildings has been noted. The City acknowledges that the Commission for Environmental Cooperation is a collaboration between Canada, Mexico and the United States to protect the environment in the context of economics and trade. The City has noted that buildings are responsible for 40 percent of total energy use in the United States. In order to reduce energy use and increase energy efficiency, the proposed project will follow California Green Building Standards, which are detailed in Section IV.B *Air Quality*, page IV.D-4 in the Draft EIR. The 2010 CALGreen Code is a code with mandatory requirements for state-regulated buildings and structures throughout California beginning on January 1, 2011. The 2013 CalGreen Code contains requirements for construction site selection, stormwater control during construction, construction waste reduction, indoor water use reduction, material selection, natural resource conservation, site irrigation conservation, and more. There is additionally the Los Angeles Green Building Code (LAGBC), which is based on the 2013 CalGreen Code. The proposed project will implement the mandatory measures outlined in the LAGBC for "newly constructed nonresidential" and adhere to the CalGreen Code. CalGreen is not meant to replace LEED accreditation, and in some environmental areas the requirements of LEED at the higher levels exceed those of CalGreen. Contractors for the proposed project will not have to adhere to LEED standards.

COMMENT NO. E7-36

Specific mitigation for the greenhouse gas emissions generated by the Project's energy consumption include, but are not limited to:

- Compliance with the City of Los Angeles Green Building Program. LA Municipal Code §§ 16.10, 16.11;
- Analyzing and incorporating the U.S. Green Building Council's LEED (Leadership in Energy and Environmental Design) or comparable standards for energy- and resource efficient building during pre-design, design, construction, operations and management.
- Designing buildings for passive heating and cooling, and natural light, including building orientation, proper orientation and placement of windows, overhangs, skylights, etc.;
- Designing buildings for maximum energy efficiency including the maximum possible insulation, use of compact florescent or other low-energy lighting, use of energy efficient appliances, etc.;
- Reducing the use of pavement and impermeable surfaces;
- Requiring water re-use systems;
- Installing light emitting diodes (LEDs) for traffic, street and other outdoor lighting;
- Limiting the hours of operation of outdoor lighting;
- Maximizing water conservation measures in buildings and landscaping, using drought tolerant plants in lieu of turf, planting shade trees;
- Ensure that the Project is fully served by full recycling and composting services;
- Ensure that the Project's wastewater and solid waste will be treated in facilities where greenhouse gas emissions are minimized and captured;
- Installing the maximum possible photovoltaic array on the building roofs and/or on the project

site to generate all of the electricity required by the Project, and utilizing wind energy to the extent necessary and feasible;
- Installing solar water heating systems to generate all of the Project's hot water requirements;
- Installing solar or wind powered electric vehicle and plug-in hybrid vehicle charging stations to reduce emissions from vehicle trips.

Mitigation Related to Project Construction

- Utilize recycled, low-carbon, and otherwise climate-friendly building materials such as salvaged and recycled-content materials for building, hard surfaces, and non-plant landscaping materials;
- Minimize, reuse, and recycle construction-related waste;
- Minimize grading, earth-moving, and other energy-intensive construction practices;
- Landscape to preserve natural vegetation and maintain watershed integrity;
- Utilize alternative fuels in construction equipment and require construction equipment to utilize the best available technology to reduce emissions.

Transportation Mitigation Measures

- Encourage and promote ride sharing programs. This might be achieved by creating a specific percentage of parking spaces for ride sharing vehicles;
- Incorporate public transit into the project design;
- Create a car sharing program within the planned community;
- Create a light vehicle network, such as a neighborhood electric vehicle (NEV) system;
- Provide necessary facilities and infrastructure to encourage residents to use low or zero emission vehicles, for example, by developing electric vehicle charging facilities and conveniently located alternative fueling stations;
- Provide a shuttle service to public transit within and beyond the planned community;
- Incorporate bicycle lanes and routes into the planned community's street systems.

RESPONSE NO. E7-36

Your suggested mitigation measures for greenhouse gas emissions have been noted. From the analysis in Section IV.D *Greenhouse Gas Emissions* in the Draft EIR, no mitigation measures are required for this section because there are no anticipated significant impacts from GHG emissions. However, the project will adhere to Title 24 Energy Efficiency standards, CalGreen, and the LAGBC. With regards to mitigation measures related to project construction and transportation, Section IV.G *Transportation/Traffic*, Page IV.G-18, of the Draft EIR lists five mitigation measures to reduce impacts to traffic and transportation facilities during construction and operation of the proposed project to below the level of significance.

These five mitigation measures are described below:

Measure Traffic-1

A construction work site control plan shall be submitted to the City of Los Angeles Department of Transportation (LADOT) for review and approval prior to the start of any construction work. The plan shall show the location of any roadway or sidewalk closures, traffic detours, haul routes, hours of operations, protective devices, warning signs and access to abutting properties.

Measure Traffic-2

All construction related traffic shall be restricted to off-peak hours.

Measure Traffic-3

41st Street shall be reclassified to a Collector Street. A Collector Street requires a 22-foot half-width roadway within a 32-foot half-width right-of-way.

Measure Traffic-4

The project applicant shall provide the number of Code required parking spaces as specified by the Department of Building and Safety:

- Building 1 consists of a single story with a mezzanine that occupies approximately 115,973 total square feet and provides 123 parking spaces;
- Building 2 consists of two stories that occupy approximately 133,680 total square feet and provides 79 parking spaces;
- Building 3 consists of a single story with a mezzanine that occupies approximately 116,724 total square feet and provides 96 parking spaces; and
- Building 4 consists of a single story with a mezzanine that occupies approximately 113,743 total square feet and provides 106 parking spaces.

Measure Traffic-5

All driveways shall be Case 2 driveways and 30 feet and 18 feet wide for two-way and one-way operations, respectively.

The proposed project's traffic impacts would not be significant at any of the off-site intersections, except at Alameda Street and Washington Boulevard. Under Alternative C, the project would not generate traffic at the ITE-recommended rate (i.e., 351 truck trips per day), which is based on surveys conducted nationally at typical warehouse facilities. Under Alternative C, the project would generate no more than 75 truck trips per day, and an analysis with this reduced number of truck trips results in no significant impacts at any of the study intersections.

COMMENT NO. E7-37

One of the first steps towards reducing black carbon is to develop a proper monitoring and reporting system. As discussed above, black carbon must be considered separately from PM.The project should monitor and make publicly available the daily concentrations of black carbon. This can be accomplished using measuring devices called *aethalometers,* which are commercially available and simple to operate. An aethalometer is an electronic box. It works by measuring the attenuation of light in certain wavelengths of particles that collect as air passes through a filter. The units come in rack-mounted as well as portable versions.

> **Detect and Mitigate "Superemitters":** Some engines that receive poor maintenance or have mechanical difficulties emit 10 to 15 times the average levels of black carbon. (Bond 2004). While these may be older engines, engine age is not the single indicator of emissions levels. A single superemitter can negate the positive reductions achieved through retrofitting or replacing a number of "average" diesel engines. Therefore, it is essential to add a mitigation n1easure that

requires the project proponents to develop a monitoring system to detect diesel engines of all varieties that emit high levels of black carbon.

A potential monitoring device is the new AE90 aethalometer which has a tailpipe monitoring extension. (See presentation by T. Hansen of Magee Scientific). Periodic measurement of vehicles using this device should be required. An incentive program could be created to help vehicle operators rapidly and effectively mitigate the emissions from superemitting vehicles.

RESPONSE NO. E7-37

The City has noted the request to consider black carbon emissions separate from particulate matter emissions. Black carbon is not considered one of the six main criteria air pollutants by the California Air Resources Board or the South Coast Air Quality Management District (SCAQMD). Therefore, there is no standard or threshold for black carbon specifically. The impacts of black carbon are considered cumulatively in the analysis of $PM_{2.5}$ and PM_{10} because black carbon is a component of diesel particulate matter emissions, which are covered in the Section IV.B *Air Quality* of the Draft EIR. Mobile sources such as diesel fueled vehicles are a major source of black carbon and particulate matter emissions. Please review the Section IV.B Air Quality for a more detailed impact analysis of these types of emissions from the proposed project.

The City acknowledges the comment about the importance of detecting and mitigating black carbon. It is out of scope for the project proponent to develop a black carbon emissions monitoring system for diesel engines. With regards to the use of *aethalometers* to detect concentrations of black carbon, monitoring and reporting of air pollutants are done by the SCAQMD's air quality monitoring stations. SCAQMD has a network of 35 permanent, multi-pollutant monitoring stations and 5 additional single pollutant monitoring stations for source lead in the Basin and a portion of the Salton Sea Air Basin in Coachella Valley.

COMMENT NO. E7-38

Schedule Deliveries to Reduce Truck Idling Time: Current California regulations require heavy-duty truck engines to be turned off after idling for 5 minutes. (13 C.C.R. § 2485). This rule, however, does not apply when the truck is in traffic or queuing. (13 C.C.R. § 2485(c)(2)). Idling time due to either of these events can be avoided by careful scheduling on the part of the project proponent. Therefore, the project should be required to develop a delivery schedule that maximally avoids both traffic en route and waiting time at the facility.

RESPONSE NO. E7-38

Your comment to reduce truck idling time has been noted. The *Air Quality Health Risk Assessment for the Proposed Alameda Industrial Park* dated September 17, 2014 (referred to here as the HRA and found in Appendix V in Volume IV of the Draft EIR) identifies the specific distances of truck travel for trucks arriving and leaving the site via the four driveways. The trucks will drive to/from their loading bays, and it is assumed that they will idle for a short time upon arriving and prior to departing. While loading and unloading, the trucks will be turned off; and if any trucks remain at the facility overnight, they will remain turned off. The applicant has specified that truck traffic will consist of cargo vans and box trucks only; no large diesel semi-tractor trucks are included in the daily traffic to the site, thus further reducing potentially harmful emissions. Although there is no regulatory or operational limit on idling duration for the category of trucks that will visit the facility, it is not likely that the trucks would idle more than five minutes at a time. Unlike for heavy duty diesel trucks, there is no mechanical advantage to idling. These assumptions were used to calculate the amount of idling emissions and driving emissions on-site.

The City has considered two alternatives that would reduce impacts associated with the emission of criteria air pollutants during the operational phase of the project, a clean fuel alternative (Alternative B) and a reduced truck trip alternative (Alternative C). Please see the Alternatives Analysis in Section VI of the Draft EIR for further information on these alternatives.

COMMENT NO. E7-39

Require all Heavy-duty Diesel Delivery Vehicles to Reduce Black Carbon Emissions: Over 80% of the U.S. depends on heavy-duty diesel trucks to deliver their goods. (See American Trucking Industry Fact Sheet). Furthermore, a new 2008 truck has only one-tenth of the fine PM emissions of a 2006 truck. (I d.). This pair of facts shows that it is essential to address black carbon from delivery trucks.

Because black carbon is a component of diesel PM, some strategies that reduce PM will also reduce black carbon. One of the most common options is the use of a catalyzed diesel particulate filter, which can be installed on both new and existing diesel engines. (See generally 69 Fed. Reg. 38957 (June 29, 2004)). The California Air Resources Board (CARB) recently proposed a rule that would require in-use heavy duty diesels to reduce their PM emissions.1 Although the rule is not in effect yet, the project should aim to achieve the standards in the rule beginning immediately by requiring the companies that deliver goods to install technology such as diesel particulate filters on their delivery trucks.

RESPONSE NO. E7-39

The concerns expressed by the Center for Biological Diversity regarding the need for reduction of carbon emissions from heavy duty vehicles and related rules proposed by CARB in 2008 have been addressed in the Draft EIR. The referenced regulation was adopted by CARB in 2009 and amended in April 2014. The regulation requires diesel trucks and buses that operate in California to be upgraded to reduce emissions. Newer heavier trucks and buses must meet PM filter requirements beginning January 1, 2012. Lighter and older heavier trucks must be replaced starting January 1, 2015. By January 1, 2023, nearly all trucks and buses will need to have 2010 model year engines or equivalent. The regulation applies to nearly all privately and publicly owned diesel fueled trucks and buses and to privately and publicly owned school buses with a gross vehicle weight rating (GVWR) greater than 14,000 pounds. The regulation provides a variety of flexibility options tailored to fleets operating low use vehicles, fleets operating in selected vocations like agricultural and construction, and small fleets of three or fewer trucks. All trucks operated in conjunction with the proposed project would be subject to the CARB Rule, as most recently amended in April 2014.

COMMENT NO. E7-40

Require All Mobile Cargo Handling Equipment to Comply With the Emissions Standards for Port Equipment: Similar to heavy-duty on-road diesel engines, reductions in PM emissions from cargo handling equipment can also reduce black carbon. California law currently requires mobile cargo handling equipment, e.g. forklifts and loaders, located at ports or intermodal railyards to reduce their PM emissions to comply with California's on-road diesel standards or with EPA's Tier 4 standards for offroad vehicles. (13 C.C.R. § 2497). The existence of such a rule for ports is clear evidence that compliance is also feasible in the contexts of warehouses. Thus, the proposed project must reduce its black carbon emissions by requiring that all cargo handling equipment comply with the rule for port equipment.

RESPONSE NO. E7-40

See Response to Comment No. E7-26. In summary, black carbon emissions are not considered one of the

six main criteria air pollutants by the California Air Resources Board or the South Coast Air Quality Management District (SCAQMD). Therefore, there is no standard or threshold for black carbon specifically. The impacts of black carbon are considered cumulatively in the analysis of $PM_{2.5}$ and PM_{10} because black carbon is a component of diesel particulate matter emissions, which are quantified in Table IV.B-8 and Table IV.B-9 in Section IV.B *Air Quality* of the Draft EIR. As noted in Comment No. E7-40, the Mobile Cargo Handling Equipment Regulation by CARB is applicable at ports and intermodal railyards, not warehouses. The proposed project is a clothing manufacturer warehouse that is on a much smaller scale than both ports and intermodal railyards and therefore not subject to the same regulations and standards. Black carbon will be reduced as Tier 4 engines are phased in according to the EPA's Tier 4 standards, which applies to specifically to diesel engine manufacturers. Further, the In-Use Off-Road Diesel Vehicle Regulation limits idling, establishes a reporting system, requires equipment labeling, and sets fleet average targets for compliance. See http://www.arb.ca.gov/msprog/ordiesel/faq/overview_fact_sheet_dec_2010-final.pdf.

COMMENT NO. E7-41

Accelerate Compliance Schedules: Because black carbon pollution causes rapid and significant atmospheric heating as well as substantial human health risks, it is necessary to address this pollutant as rapidly as possible. A variety of regulations, as discussed above, will require reduced diesel emissions. The schedule for compliance with these standards, however, is often many years from the date of enactment. The project should create incentives for early compliance with all regulatory reduction measures so that black carbon can be reduced as rapidly as possible.

RESPONSE NO. E7-41

See Response to Comment Nos. E7-26 and E7-40. In summary, black carbon is not considered one of the six main criteria air pollutants by the California Air Resources Board or the South Coast Air Quality Management District (SCAQMD). Therefore, there is no standard or threshold for black carbon specifically. As discussed in Response to Comment No. E7-34, heavy duty vehicle rules determined by CARB are addressed in the Draft EIR. The proposed project is subject to PM filter requirements and engine regulations as discussed in Response to Comment Nos. E7-39 and E7-40.

COMMENT NO. E7-42

Carbon Offsets

After all measures have been implemented to reduce emissions in the first instance, remaining emissions that cannot be eliminated may be mitigated through offsets. Care should be taken to ensure that offsets purchased are real (additional), permanent, and verified, and all aspects of the offsets should be discussed in the MND. As stated by CAPCOA, a potential cost effective offset and verifiable offset could include an energy-efficient retrofit of existing building stock in the Project area to offset the remainder of the Project's emissions. (CAPCOA 2008 at 80.) As demonstrated by the Office of the Attorney 'General offsets are a feasible CEQA mitigation measures. In a recent settlement with the Attorney General regarding the mitigation of greenhouse gas emissions from a proposed refinery expansion, ConocoPhillips Co. agreed to make a one-ti1ne payment of $7 million to a carbon offset fund created by the Bay Area Air Quality Management District "to achieve verifiable quantifiable reductions in GHG emission, with priority given to projects near" the project area. 15 The Settlement also provided $2.8 million to fund reforestation and conservation projects and $200,000 for restoration of the San Pablo Bay wetlands. Offsetting GHG emissions in the project area, including reductions and offsets at existing warehouses that were referenced in the Initial Study, could also yield corollary benefits, such as reductions in criteria pollutants. Because the MND does not offset the remainder of the Project's greenhouse gas emissions, the

Project's impacts have not been fully mitigated. Absent full mitigation, the City must prepare an EIR to evaluate Project greenhouse gas emissions.

RESPONSE NO. E7-42

Your comment on using carbon offsets to reduce the project impacts has been noted. Mobile sources are responsible for the majority of carbon emissions. A thorough analysis on the number of truck trips and resulting emissions was completed in the Traffic Impact Study. It was determined that the impacts would not be great enough to necessitate the purchase of carbon offsets. Carbon offsets are typically purchased by businesses to comply with the California cap and trade program. The proposed project type to construct a warehouse does not fit under the covered entities that must abide by the California cap and trade program. (See Subarticle 3. § 95811 Covered Entities) In the ConocoPhillips Settlement Agreement in 2007 in California, the EIR stated that the Hydrogen Plant would result in 1.25 million metric tons of CO_2 emissions. The plant is a covered entity under the cap and trade program and produces a significant amount of emissions. Comparatively, the proposed project's construction and operational (including all mobile sources) emissions are well below the CARB recommended threshold of 25,000 metric tons of CO_{2e} per year and is not a covered entity under the cap and trade program. (See Table IV.D-3, *Unmitigated CO_2 and CO_{2e} Emissions)* The proposed project's GHG emissions are expected to be less than significant and thus not require mitigation measures. Please refer to Section IV.D *Greenhouse Gas Emissions* in the Draft EIR for a complete project level analysis of the greenhouse gas emissions.

COMMENT NO. E7-43

For the reasons set forth above, because there is a fair argument that the Project will have significant environmental impacts, the City must prepare an EIR for the Project. Please do not hesitate to contact Matthew Vespa at (415) 436-9682 x.309, mvespa@biologicaldiversity.org, or Jonathan Evans (213)598-1466, ievans@biologicaldiversity.org, if you have any questions regarding these comments. Thank you for your time and consideration of our concerns.

RESPONSE NO. E7-43

As addressed in Response to Comment No. E7-17, the concerns expressed by the Center for Biological Diversity regarding the request for preparation of an EIR have been addressed in relation to the 2014 proposed project. The City of Los Angeles prepared an Initial Study for the proposed project and published a Notice of Preparation of an EIR and solicited scoping comments between June 17 and July 17, 2014. A Draft EIR for the 4051 South Alameda Street Project was prepared by the City of Los Angeles Department of City Planning, Environmental Analysis Section, and circulated for public review between January 22 and March 9, 2015.

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LETTER NO. E8

Silvia Borges

COMMENT NO. E8-1

Hello, my name is Silvia Borges.
I have lived in the City of Los Angeles for 25 years. I have worked for IMPACT since 2003. I was first hired at an entry level position, I've been promoted to inspector, area manager and now I work in the payroll department.

This job has allowed me to provide a better life and education for my son. I enjoy working with my coworkers and my boss is an excellent person. I've always enjoyed working at IMPACT.

I am happy to be part of this company. I feel proud whenever I see our products in stores and people wearing the garments we've produced at our company.

RESPONSE NO. E8-1

Your comment on the proposed project has been noted. Your concerns will be taken into consideration by the decision-makers prior to taking action on the proposed project.

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LETTER NO. E9

Craig Borstein
Alameda 24th Street, LLC
11766 Wilshire Blvd., Suite 820
Los Angeles, CA 90025

COMMENT NO. E9-1

We previously sent a letter to Christina Toy Lee in the Planning Department on June 25, 2013 regarding the above referenced industrial development project on the south west corner of Alameda Street and E. Martin Luther King Jr. Boulevard in the City of Los Angeles. We have updated our previous letter to account for a modified site plan and the information contained in the draft EIR.

We are the owner of an approximate 18 acre parcel located directly adjacent to the subject property with frontage on the north side of E. Martin Luther King Jr. Boulevard, directly adjacent to the proposed development. Our land is built out with approximately 500,000 square feet of industrial space in a master planned business park setting. We want to go on record that we want to see the site developed as a thoughtful industrial project, but we have several concerns with the proposed development as outlined below.

RESPONSE NO. E9-1

This comment provides introductory transmittal comments and does not directly address the contents of the Draft EIR. Comments on the Draft EIR follow with responses.

COMMENT NO. E9-2

The first and main concern is related to the very high Floor to Area Ratio ("FAR") and the inadequacy of parking to support the proposed square footage and design. The site plan is proposed to contain 481,022 SF of buildings on a land area of 546,921 SF, representing an FAR of approximately 88%.

RESPONSE NO. E9-2

Your comment regarding FAR of the proposed project has been noted. The proposed project is located in the City of Los Angeles Height District No. 2, which allows an FAR of 6 times the buildable area of the lot.[16] The proposed project's FAR of 0.88 is well within the allowable FAR for the property.

COMMENT NO. E9-3

There are 368 parking stalls proposed with is equivalent to a parking ratio of .77 per 1,000 square feet. If this was a high cube distribution building with 2-3% office build out, then that might be practical. However, these 4 buildings are depicted on the site plan as divisible into 12 different suites containing an average office and mezzanine build out of 24.2%).

[16] City of Los Angeles Municipal Code. §21.1.A.2 Accessed 3-18-15. Available online at: http://www.amlegal.com/nxt/gateway.dll/California/lamc/municipalcode?f=templates$fn=default.htm$3.0$vid=amlegal:losangeles_ca_mc

RESPONSE NO. E9-3

Your comment regarding the adequacy of parking for the proposed project has been noted. The buildings will have 353,375 square feet of warehouse space, 112,745 square feet of office space, and 14,000 square feet of manufacturing space. Required parking for warehouse use is one space per 500 square feet of floor area for the first 10,000 square feet and one space per 5,000 square feet of floor area thereafter. Required parking for office and manufacturing use is one space per 500 square feet of floor area.[17] The number of parking spaces required for the proposed development is therefore 403. The proposed project will provide 404 on-site parking spaces, which exceeds applicable requirements by 1 parking space. The proposed project would also provide 49 short-term and 60 long-term bicycle parking spaces, which can be used to replace up to 64 required automobile parking spaces at a ratio of one automobile parking space for every four bicycle parking spaces.[18] This would result in enough on-site automobile parking to accommodate between 23,500 and 55,500 square feet of additional office or manufacturing floor area. It is further anticipated that the location of the proposed project in proximity to the Metro Blue Line light rail line would enable employees to use alternate means of transportation, thus further reducing the need for on-site parking. Street parking will also continue to be available on East 41st Street and the south side of Martin Luther King Jr. Boulevard. Subsequent conversion of the property from warehouse to office or manufacturing would require permits from the City, at which time any increased parking requirements would need to be addressed.

COMMENT NO. E9-4

Approximately 50% of the mezzanine space is classified on the site plan as "warehouse space" even though it is highly likely to be converted into office use at a later date thereby requiring much more parking than now provided. Even more likely, the mezzanine space will never be used for warehouse purposes as this would require elevators, and it will become offices from the start. In addition, some of the suites depicted on the site plan (the middle two units in building #1 for example) do not contain any first floor office build out even though there is a storefront entrance on the first floor for a separate occupant. We are concerned that the office use of this project, whether initially or eventually, is understated on the site plan and there is not adequate parking proposed to accommodate this design.

RESPONSE NO. E9-4

Your comment regarding the adequacy of parking for the project has been noted. As detailed in Response to Comment No. E9-3, the project will have adequate number of parking spaces provided on-site to accommodate both car and truck parking and queuing needs on-site, and will meet the requirement for parking per City of Los Angeles Municipal Code. Should the project allow any additional office uses within the proposed buildings in the future, a separate office parking requirement would need to be satisfied at that time.

COMMENT NO. E9-5

The second concern is that given the site plan design, all ingress and egress is on Martin Luther King Jr. Blvd. and 41st Street with no entrances on Alameda Street or Long Beach Avenue. Because of the site design, we question whether a 5 foot additional street dedication on Martin Luther King Jr. Blvd. is sufficient. We ask that the City pay particular attention to the widening dedication on Martin Luther King Jr. Blvd.

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17 City of Los Angeles Municipal Code § 12.21.A.4(c). Accessed 3-18-15. Available online at: https://law.resource.org/pub/us/code/city/ca/LosAngeles/Municipal/chapter01.pdf

18 City of Los Angeles Municipal Code § 12.21.A.4. Accessed 3-18-15. Available online at: https://law.resource.org/pub/us/code/city/ca/LosAngeles/Municipal/chapter01.pdf

RESPONSE NO. E9-5

According to the Southeast Los Angeles Community Plan (SELACP), Martin Luther King Jr. Boulevard is designated by the City of Los Angeles as a local street, which requires a full public right-of-way width of 60 feet and a half roadway width of 18 feet. According to the City Bureau of Engineering District Map, the dedicated half width of the existing right-of-way of Martin Luther King Jr. Boulevard adjacent to the proposed project site is only 25 feet. The dedication of an additional 5 feet of right-of-way on the south side of Martin Luther King Jr. Boulevard adjacent to the proposed project site would thereby achieve compliance with City roadway dedication standards for local streets. The dedicated area will be improved with new curb, gutter, sidewalk, street lights, and street trees to City requirements. The following table shows the ROW dedications for the streets surrounding the project site:

Street Name	Existing SELACP			SELACP Update			Mobility Plan 2035		
	Class.	ROW ½ Width (feet)	Roadway ½ Width (feet)	Class.	ROW ½ Width (feet)	Roadway ½ Width (feet)	Class.	ROW ½ Width (feet)	Roadway ½ Width (feet)
41st Street	Major Hwy Class II	52	40	Collector	32	22	Collector	33	20
Alameda Street	Major Hwy Class II	52	40	Major Street	---	---	Avenue III	36	23
Martin Luther King Blvd.	Local (standard)	30	18	Local (standard)	30	18	Local (standard)	30	18
Long Beach Ave.[19]	Major Hwy Class II	52	40	Collector	32	22	Boulevard I	68	50

On October 4, 2013, the City of Los Angeles Department of Transportation (DOT) issued a traffic assessment to the Department of City Planning regarding review of a supplemental traffic analysis to an analysis originally prepared in September 2012 on the proposed project prepared by Traffic Design, Inc. (included as Appendix XI to the Draft EIR). DOT found that the supplemental traffic analysis adequately evaluated the revised project's impacts on the surrounding community, except for recommended project requirements, including street dedications.[20] As part of the Southeast Los Angeles Community Plan update process, the Department of City Planning and DOT evaluated the current street designations. As a result, DOT recommended that although the Community Plan Update had not yet been adopted at that time, the project include the highway dedication and widening requirements. The updated community plan recommends that 41st Street, which is currently classified as a local street, be reclassified to a Collector Street and makes no recommendations for changing the classification of the other streets along the project's frontage. The City has updated the Mobility Element of the General Plan, which has proposed additional classifications for certain types of roadways. The project has been reviewed under the existing standards described in the DOT letter dated October 4, 2013. However, the required dedications under the Mobility Plan update would be as in the table above. The project will comply with applicable street dedications to the satisfaction of the pertinent City agencies including Planning, DOT, and BOE.

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19 Long Beach Avenue is designated as a Major Highway II in the existing SELACP and proposed update to the SELACP which requires a dedicated right-of-way width of 104 feet and a roadway width of 80 feet The current dedicated right-of-way width of Long Beach Avenue is 140 feet which includes 60 feet of right-of-way for the Metro Blue Line light rail line. Long Beach Avenue is designated as a Boulevard I in Mobility Plan 2035 which requires a dedicated right-of-way width of 136 feet which includes the 60 feet of Blue Line right-of-way. The currently dedicated right-of-way width of 140 feet complies with the requirements of the existing and proposed SELACP and Mobility Plan 2035.

20 Carranza, Tomas, Senior Transportation Engineer. Department of Transportation. October 4, 2013. City of Los Angeles Inter-Departmental Correspondence: Traffic Assessment for the Proposed Warehouse Project at 4051 South Alameda Street. Volume VI, Appendix XI of the Draft EIR.

COMMENT NO. E9-6

The third concern is that the design of the complex lends itself to truck stacking in the street rather than internal to the project. For example, all truck loading positions are located directly in front of street curb cuts and the proposed building face is only around 70 feet from the curb. We recognize that there are internal truck wells in addition to the 70 feet, however, these trucks are going to need to back into these positions, and there does not seem to be enough room to do it onsite without trucks cueing in the street. The combination of dock doors in front of the curb cuts and very high site coverage / FAR compounds this problem.

RESPONSE NO. E9-6

The proposed project provides adequate loading spaces in compliance with Los Angeles Municipal Code §§ 12.21 A-4(g), 12.21 A-5(e), 12.21 A-5(i), 12.21 A-5(j), and 12.21 C-6. The loading bays are 55 feet deep, and the distance from the loading dock to the planter curb inside the project site is 120 feet, which is adequate to accommodate the maneuvering of 65-foot-long tractor trailers to the loading areas on-site. Queuing of trucks on the street would therefore not be required. Please see the revised Figure IV.G-1, *Access Driveways*, in Section IV, page IV-6, *Corrections and Additions to the Draft EIR*, for a diagram for maneuvering a 65-foot-long tractor trailer on-site.

COMMENT NO. E9-7

The fourth and last concern is that we want to make sure that the project is attractive in nature and has a reasonable amount of landscaping, especially on the Martin Luther King Jr. Boulevard street frontage. The landscape percentage was not shown in the table summary on the site plan, but it appeared to be minimal after the additional planned dedications.

RESPONSE NO. E9-7

Your comment related to concerns about whether the project has adequate landscaping has been noted. The City of Los Angeles has a policy in which at least 7 percent of all parking lots need to be landscaped, according to the Urban Design Chapter of the Southeast Los Angeles Community Plan (Chapter V, page V-4). The landscape percentage of the proposed project design is 7.7 percent, which exceeds 7 percent of the parking lot area with installation of 1 tree for every 8 parking stalls within the parking lot. The applicant will also dedicate 5 feet of frontage along the southern side of Martin Luther King Jr. Boulevard, 22 feet of frontage along the northern side of 41st Street, and 8.5 to 12.5 feet of frontage along the western side of Alameda Boulevard for public right-of-way (ROW) pursuant to City of Los Angeles Department of Transportation (DOT) project requirements provided in October 2013 and will improve the dedicated area with new curb, gutter, sidewalk, street lights, and street trees to City of Los Angeles requirements.[21] The following table shows the required ROW and street widths for the streets surrounding the project site as described in the existing Southeast Los Angeles Community Plan (SELACP), the proposed update to the SELACP, and the update to the Mobility Element of the City's General Plan (Mobility Plan 2035):

[21] Carranza, Tomas, Senior Transportation Engineer. Department of Transportation. October 4, 2013. City of Los Angeles Inter-Departmental Correspondence: Traffic Assessment for the Proposed Warehouse Project at 4051 South Alameda Street.. Volume VI, Appendix XI of the Draft EIR.

Street Name	Existing SELACP			SELACP Update			Mobility Plan 2035		
	Class.	ROW ½ Width (feet)	Roadway ½ Width (feet)	Class.	ROW ½ Width (feet)	Roadway ½ Width (feet)	Class.	ROW ½ Width (feet)	Roadway ½ Width (feet)
41st Street	Major Hwy Class II	52	40	Collector	32	22	Collector	33	20
Alameda Street	Major Hwy Class II	52	40	Major Street	---	---	Avenue III	36	23
Martin Luther King Blvd.	Local (standard)	30	18	Local (standard)	30	18	Local (standard)	30	18
Long Beach Ave.[22]	Major Hwy Class II	52	40	Collector	32	22	Boulevard I	68	50

The project has been reviewed under the existing standards described in the DOT letter dated October 4, 2013. However, the required dedications under the Mobility Plan update would be as in the table above. The project will comply with applicable street dedications to the satisfaction of the pertinent City agencies including Planning, DOT, and BOE. As stated on page III-1 of the Project Description in the Draft EIR, the proposed project has also been designed with the rear of Buildings 1 and 2 and the rear of Buildings 3 and 4 facing each other, and the remaining three faces of each building have been designed with pedestrian-scale features such as decorative concrete panels in different shades of beige with gray trim and glazing to break up the building facades, mechanical roof equipment completely screened from view, enclosure of trash areas, and operable windows on the mezzanine level, in order to improve the aesthetics of the building frontage.

COMMENT NO. E9-8

To be clear, we do want to see the site developed as a thoughtful industrial park. Hopefully someone will take a step back and evaluate the total square footage and realistic office build out in this project as it is currently designed and figure out where these employees are supposed to park. If parking is not adequately provided for on-site, then employees will end up parking in the streets (narrowing room for trucks) and on neighboring properties without permission which is unacceptable.

RESPONSE NO. E9-8

Your comment regarding the adequacy of parking for the project has been noted. The project will have an adequate number of parking spaces provided on-site to accommodate both car and truck parking and queuing needs on-site, and will meet the requirement for parking per City of Los Angeles zoning and parking codes. Should the project allow any additional office uses within the proposed buildings in future, a separate office parking requirement will have to be satisfied. Please see Response to Comment Nos. E9-2 through E9-7, above, for further details concerning building square footage, aesthetics, parking and truck queuing.

[22] Long Beach Avenue is designated as a Major Highway II in the existing SELACP and proposed update to the SELACP which requires a dedicated right-of-way width of 104 feet and a roadway width of 80 feet The current dedicated right-of-way width of Long Beach Avenue is 140 feet which includes 60 feet of right-of-way for the Metro Blue Line light rail line. Long Beach Avenue is designated as a Boulevard I in Mobility Plan 2035 which requires a dedicated right-of-way width of 136 feet which includes the 60 feet of Blue Line right-of-way. The currently dedicated right-of-way width of 140 feet complies with the requirements of the existing and proposed SELACP and Mobility Plan 2035.

COMMENT NO. E9-9

In addition the design of the truck loading will need to be examined to ensure that any truck stacking is onsite rather than in the street.

RESPONSE NO. E9-9

Your comment regarding truck stacking for the proposed project has been noted. The proposed project provides adequate loading spaces in compliance with Los Angeles Municipal Code §§ 12.21 A-4(g), 12.21 A-5(e), 12.21 A-5(i), 12.21 A-5(j), and 12.21 C-6. The loading bays are 55 feet deep, and the distance from the loading dock to the planter curb inside the project site is 120 feet, which is adequate to accommodate the maneuvering of 65-foot-long tractor trailers to the loading areas on-site. Queuing of trucks on the street would therefore not be required. Please see the revised Figure IV.G-1, *Access Driveways*, in Section IV, page IV-6, *Corrections and Additions to the Draft EIR*, for a diagram for maneuvering a 65-foot-long tractor trailer on-site.

LETTER NO. E10

Bruce Campbell Letter No. 1

COMMENT NO. E10-1

Please consider this my Submission # 1 regarding the DEIR on the 4051 South Alameda Street proposal.

Seeing that my important comment letter on the NOP (sent on July 9, 2014) was excluded from the comment letters in the Appendixes of the document – and thus my key concerns were often not addressed in the DEIR, I want this included in the comment letters on that document (the DEIR), so that the odds of these words evaporating into thin air once again are reduced.

Please look for near future Submissions of mine regarding the DEIR – which will all be numbered.

RESPONSE NO. E10-1

Your comment regarding your previous comments in your letter submitted for the Notice of Preparation has been noted. Your letter was inadvertently left out of Appendix II of the Draft EIR. However, your comments have been addressed in the body of the Draft EIR, consistent with the approach to all the comments from the scoping period. Your letter will be added to Appendix II as part of Section IV, *Corrections and Additions to the Draft EIR* of the Final EIR.

COMMENT NO. E10-2

Since I did not find my comments when I scrolled through the comments on the Notice of Preparation, I am hereby sending my comments dated July 8, 2014 (which were e-mailed at 11:02 AM on July 9th, 2014) so that City personnel cannot claim that my comments never arrived. I also expect official documents to respond to my points raised 8 months ago – rather than to pretend such comments were never submitted!

RESPONSE NO. E10-2

As stated in Response to Comment No. E10-1, your letter was inadvertently left out of Appendix II, Notice of Preparation Letters, of the Draft EIR. However, your comments have been addressed in the body of the Draft EIR, consistent with the approach to all the comments from the scoping period. Your letter will be added to Appendix II as part of Section IV, *Corrections and Additions to the Draft EIR* of the Final EIR. The responses to your comments follow below.

COMMENT NO. E10-3

1. I note (on a door on the 7th floor of L.A. City Hall) that the 41st and Alameda proposed project has been moved to the **"Major Projects"** part of the Planning Department.

RESPONSE NO. E10-3

The City acknowledges your comment regarding the proposed project being moved to the EIR Unit of the Major Projects section of the City Planning Department.

COMMENT NO. E10-4

2. I find it ironic that the project is apparently "major" enough to require an EIR, is "major" enough to be moved to that part of the Planning Dept., and yet it has been **declared that the proposed project is not of regional significance** and thus there are no plans for an in-person public meeting in which the public can comment on what the scope of the study should be.

RESPONSE NO. E10-4

Your comment regarding the regional significance of the proposed project has been noted. The City has determined that the project is not of regional significance and an NOP scoping meeting is not required. The City, as the lead agency under CEQA, has the authority to make this determination. Section 15206 of the CEQA Guidelines identifies a proposed project of statewide, regional, or areawide significance as one that meets the following criteria:

> (b)(2) A project has the potential for causing significant effects on the environment extending beyond the city or county in which the project would be located. Examples of the effects include generating significant amounts of traffic or interfering with the attainment or maintenance of state or national air quality standards. Projects subject to this subdivision include:
>
> (A) A proposed residential development of more than 500 dwelling units.
>
> (B) A proposed shopping center or business establishment employing more than 1,000 persons or encompassing more than 500,000 square feet of floor space.
>
> (C) A proposed commercial office building employing more than 1,000 persons or encompassing more than 250,000 square feet of floor space.
>
> (D) A proposed hotel/motel development of more than 500 rooms.
>
> (E) A proposed industrial, manufacturing, or processing plant, or industrial park planned to house more than 1,000 persons, occupying more than 40 acres of land, or encompassing more than 650,000 square feet of floor area.

The proposed project would occupy approximately 353,375 square feet of warehouse space, 112,745 square feet of office space, and 14,000 square feet of manufacturing space for a total of 480,120 square feet and would employ 994 persons. As a result, the City has determined that it is not of regional significance and an NOP scoping meeting is not required. Additionally, the City has provided an opportunity for public comments to be submitted via postal letter or email as part of the scoping process. As required by CEQA, your comments have been addressed in the Draft EIR.

COMMENT NO. E10-5

3. Either in the EIR, or preferably as a prelude to scoping, **the public deserves to have the knowledge of exactly who was "the grand decision-maker" who apparently decided that this neighborhood wherein a major project** is proposed (involving polluting vehicles in a hard-to-access area in the already excessively-polluted Alameda Corridor region) **was not deserving of public scoping hearing.** (Please, either have someone admit to it, or we may pursue other methods to gather documents which expose the trail of who was involved. **Was the District # 9 Councilmember's office, someone with the Mayor's office, and/or the applicant or his people involved with convincing the "grand decision-maker" to make sure to avoid a public scoping hearing since there allegedly was no regional significance?)**

RESPONSE NO. E10-5

As discussed in Response to Comment No. E10-4, per Section 15206 of the CEQA Guidelines the City has determined that the project is not of regional significance and an NOP scoping meeting is not required. Your concerns will be taken into consideration by the decision-makers prior to taking action on the proposed project.

COMMENT NO. E10-6

4. **I consider the "current project" documentation to be invalid.** Not only must there be **a public scoping meeting** to discuss the regional impacts of the proposed project, but when **there are continued blatant lies in regards to such things as how wide streets are** in the vicinity and **whether homes exist south of 41st Street and east of Long Beach Ave.**, why should be believe things like sampling for toxic materials and believing the number of theorized vehicle trips per day relating to the project(?)

I call for admission as to **who pressured whom, and who made the decision to avoid a public scoping hearing on the regional significance of the PIMA project.**

RESPONSE NO. E10-6

As discussed in Response to Comment No. E10-4, per Section 15206 of the CEQA Guidelines the City has determined that the project is not of regional significance and an NOP scoping meeting is not required. Street widths are documented by the City of Los Angeles Department of Transportation and the Bureau of Engineering. The Draft EIR acknowledges that the area surrounding the proposed project site is developed almost exclusively with light and heavy industrial uses with limited small lot single-family residential homes intermixed with light/industrial warehouse uses to the south and residential areas farther to the west. Please see Section II, *Environmental Setting*, of the Draft EIR for further information. The 500-foot property owner and occupant mailing list and map have been field-verified. No residences were identified east of the project site within the 500-foot radius. The map and verification of this information are also available at the City of Los Angeles Planning Department. Your concerns will be taken into consideration by the decision-makers prior to taking action on the proposed project.

COMMENT NO. E10-7

Then, **have two humans bring a tape measure and measure the streets that surround the 41st and Alameda site. Record correct info, and replace bogus numbers in documents such as under "Environmental Setting" on page 7 of 581 with the correct numbers.** (I am no lawyer, but I believe that many courtrooms like relative truth rather than easily-disproved lies, so change the street measurements if you want to retain any credibility.)

RESPONSE NO. E10-7

Your comment regarding the measurement of street widths that surround the proposed project has been noted. The existing dedicated street rights-of-way and roadway widths are shown in the table below:

Street Name	Location in Relation to Project Site	Existing ROW ½ Width (dedicated)	Proposed ROW ½ Width
41st Street	South	30 feet	52 feet
Alameda Street	East	23.5 feet	36 feet
East Martin Luther King Junior Boulevard	North	25 feet	30 feet
Long Beach Avenue East	West	70 feet	70 feet

The street widths listed in the Environmental Setting section of the Initial Study refer to additional dedication of street right-of-way to the City. The project will comply with applicable street dedications to the satisfaction of the pertinent City agencies including Planning, DOT, and BOE. The City Bureau of Engineering process for street dedication allows the City to obtain necessary public street right-of-way from private property owners to meet City standards. Every street in the City of Los Angeles is classified according to its prescribed transportation use. The categories include Major and Secondary Highways, Collector Streets, and various classifications of local and hillside streets. Each type of street has a required right-of-way width, roadway width, and sidewalk width. In order to enforce these requirements, the Bureau of Engineering has the authority to obtain the necessary right-of-way from private property owners when the properties are developed. One of two methods of obtaining the necessary right-of-way occurs through a Highway Dedication clearance on a Department of Building and Safety Building Permit Application (B&S Application). In addition to the right-of-way dedication, the private property owner may be required to make necessary improvements such as roadway widening and installation of curb, gutter, curb ramps, and sidewalk. If the existing public right-of-way is already fully improved, the private property owner is requested to construct additional sidewalk over the newly dedicated property, repair or replace broken and off grade sidewalk, and close unused driveways.

COMMENT NO. E10-8

I want to point out that another major problem with the **"Environmental Setting"** portion is that **it pretends that there are no residences south of 41st Street and east of Long Beach Ave.** Please cease having Planning Dept. officials swallow whatever developers and often their Council lackeys tell them! You can go to the area and look for homes (which you will find) -- you can even bring a tape measure to do two tasks at once!!

RESPONSE NO. E10-8

Your comment regarding the existence of residences south of 41st Street and east of Long Beach Avenue has been noted. Section II, *Environmental Setting* (page II-1), of the Draft EIR acknowledges that the area surrounding the proposed project site is developed almost exclusively with light and heavy industrial uses with limited small lot single-family residential homes intermixed with light/industrial warehouse uses to the south and residential areas farther to the west. The 500-foot property owner and occupant mailing list and map have been field-verified. No residences were identified east of the project site within the 500-foot radius. The map and verification of this information are also available at the City of Los Angeles Planning Department.

COMMENT NO. E10-9

It is my understanding that, though comments on earlier variations of the project are in "the file", that

those comments will not count toward scoping comments on the current project. Though I will try to get important points in the record again, **but why should an old case number and the applicant's earlier info still be valid, and yet the comments on such a case number apparently will not count unless re-submitted?** *(Please point to a legal regulation which says that applicants can keep documents in the record, while also saying that comments on such documents would not formally be considered in the record to challenge the newer project.)*

RESPONSE NO. E10-9

Your comment regarding the validity of scoping comments for a previously submitted project has been noted. The City previously prepared a draft mitigated negative declaration (MND) for the proposed project. At the request of the applicant, the City has now prepared the Draft EIR, which supersedes the draft MND. Pursuant to section 21091(d) of the California Public Resources Code and section 15074 of the State CEQA Guidelines, a lead agency is required to consider comments received during the public review process for a draft MND but is not required to respond to those comments in writing. The City has nevertheless retained the comments received on the draft MND in its files as required by section 15208 of the State CEQA Guidelines.

COMMENT NO. E10-10

I note that **"Environmental Settings"** has changed from the earlier document. Taking my advice, Alameda Street was declared to be east rather than south of the site -- plus 41st Place was changed to 41st Street as I had pointed out. **WHAT ABOUT BOGUS ESTIMATES / MEASUREMENTS OF THE ADJACENT STREETS to the 41st and Alameda site?? Those remain not only very suspect, but BLATANTLY INACCURATE!**

RESPONSE NO. E10-10

Your comment regarding the location of streets discussed in the Environmental Setting section of the Initial Study has been noted. These discrepancies have been corrected in the Environmental Setting Section II of the Draft EIR.

COMMENT NO. E10-11

A few of us mentioned large trucks in earlier comments. **The EIR must be very clear as to exactly what kind of trucks will be able to access which streets and which driveways in the area of the 41st and Alameda St. site. Will the trucks with 53 foot trailers and large sleeper cabs be able to access the area -- by which streets and to which driveways?** If not, explicitly mention in the EIR that no trucks with 53 foot trailers and sleeper cabs will be forbidden to enter the area. Even some other trucks will have a hard time with Long Beach Ave. and other streets and driveways in the area.

RESPONSE NO. E10-11

Your comment regarding the types of trucks proposed to be used for the proposed project and driveway access has been noted. The project applicant has specified that truck traffic would consist of cargo vans and box trucks only; no large diesel semi-tractor trucks would be included in the daily traffic to the site. The proposed project would nevertheless accommodate 65-foot-long tractor trailers should such larger trucks ever be required to access the project site. Please see the revised Figure IV.G-1, *Access Driveways*, in Section IV, *Corrections and Additions to the Draft EIR*, for a diagram for maneuvering a 65-foot-long tractor trailer on-site. The roadway lane configuration and geometric characteristics of City streets are designed for all types of vehicles including trucks. It is the traffic capacity that is usually determined

when development projects are proposed. It is a standard industry procedure to use a passenger car equivalent factor (recommended by the Highway Capacity Manual published by the Federal Highway Administration) to convert all types of vehicles into an equivalent number of passenger cars in traffic capacity analysis. The turning radius requirement and load carrying capacity of trucks, including 70-feet-long trucks weighing 80,000 pounds, are roadway design elements that are appropriately applied in the design of all City streets that allow truck traffic. It is the volume (i.e., hourly number of vehicles, including trucks, converted into passenger car equivalents using recommended conversion factors) that is used to determine traffic carrying capacity at the intersections and roadways. All development projects, such as the current project, are subject to this determination by the City Department of Transportation to review any potential project traffic impacts to the circulation system. Additionally, the queuing lane and staging area design are part of project's site design requirement based on project specific traffic (including trucks) needs. LADOT concurred with results of the traffic study in their letters of approval dated February 4, 2013 and October 4, 2013 (Appendix XI in Volume VI of the Draft EIR) of the traffic study addressed to Department of City Planning. The remarks and conclusions made in the approval letter will be considered in subsequent phases as part of entitlement process.

The City Bureau of Engineering process for street dedication allows the City to obtain necessary public street right-of-way from private property owners to meet City standards. Every street in the City of Los Angeles is classified according to its prescribed transportation use. The categories include Major and Secondary Highways, Collector Streets, and various classifications of local and hillside streets. Each type of street has a required right-of-way width, roadway width, and sidewalk width. In order to enforce these requirements, the Bureau of Engineering has the authority to obtain the necessary right-of-way from private property owners when the properties are developed. One of two methods of obtaining the necessary right-of-way occurs through a Highway Dedication clearance on a Department of Building and Safety Building Permit Application (B&S Application). In addition to the right-of-way dedication, the private property owner may be required to make necessary improvements such as roadway widening and installation of curb, gutter, curb ramps, and sidewalk. If the existing public right-of-way is already fully improved, the private property owner is requested to construct additional sidewalk over the newly dedicated property, repair or replace broken and off grade sidewalk, and close unused driveways. The following table shows the required ROW and street widths for the streets surrounding the project siteas described in the existing Southeast Los Angeles Community Plan (SELACP), the proposed update to the SELACP, and the update to the Mobility Element of the City's General Plan (Mobility Plan 2035):

Street Name	Existing SELACP			SELACP Update			Mobility Plan 2035		
	Class.	ROW ½ Width (feet)	Roadway ½ Width (feet)	Class.	ROW ½ Width (feet)	Roadway ½ Width (feet)	Class.	ROW ½ Width (feet)	Roadway ½ Width (feet)
41st Street	Major Hwy Class II	52	40	Collector	32	22	Collector	33	20
Alameda Street	Major Hwy Class II	52	40	Major Street	---	---	Avenue III	36	23
Martin Luther King Blvd.	Local (standard)	30	20	Local (standard)	30	18	Local (standard)	30	18
Long Beach Ave.[23]	Major Hwy Class II	52	40	Collector	32	22	Boulevard I	68	50

[23] Long Beach Avenue is designated as a Major Highway II in the existing SELACP and proposed update to the SELACP which requires a dedicated right-of-way width of 104 feet and a roadway width of 80 feet The current dedicated right-of-way width of Long Beach Avenue is 140 feet which includes 60 feet of right-of-way for the Metro Blue Line light rail line. Long Beach Avenue is designated as a Boulevard I in Mobility Plan 2035 which requires a dedicated right-of-way width of 136 feet which includes the 60 feet of Blue Line right-of-way. The currently dedicated right-of-way width

The project has been reviewed under the existing standards described in the DOT letter dated October 4, 2013. However, the required dedications under the Mobility Plan update would be as in the table above. The project will comply with applicable street dedications to the satisfaction of the pertinent City agencies including Planning, DOT, and BOE. LADOT concurred with results of the traffic study in their letters of approval dated February 4, 2013 and October 4, 2013 (Appendix XI in Volume VI of the Draft EIR) addressed to Department of City Planning. As stated in the approval letter, the following items and site plan requirements will be verified and addressed as part of the entitlement process:

- Construction work site traffic control plan
- Highway dedication and street widening requirements
- 41st St. to be reclassified to a Collector Street.
- Parking requirements
- Driveway access
- Development review fees

COMMENT NO. E10-12

Please examine Sarah Nolan's concerns about lined up traffic waiting to turn in their scrap metal (when considering how accessible certain roads would be when giant trucks are seeking to travel on narrow roads), as well as the Food Bank's concern that there still be parking on both sides of 41st Street.

RESPONSE NO. E10-12

As discussed in Response to Comment No. E10-11 above, roadway design elements are appropriately applied in the design of all City streets that allow truck traffic. Additionally, parking standards are appropriately applied in the design of all City streets. The applicant will be required to adhere to City parking standards for the portions of 41st Street that are proposed to be improved. The proposed project provides adequate loading spaces in compliance with Los Angeles Municipal Code §§ 12.21 A-4(g), 12.21 A-5(e), 12.21 A-5(i), 12.21 A-5(j), and 12.21 C-6. The loading bays are 55 feet deep, and the distance from the loading dock to the planter curb inside the project site is 120 feet, which is adequate to accommodate the maneuvering of 65-foot-long tractor trailers to the loading areas on-site. Queuing of trucks on the street would therefore not be required. Please see the revised Figure IV.G-1, *Access Driveways*, in Section IV, page IV-6, *Corrections and Additions to the Draft EIR*, for a diagram for maneuvering a 65-foot-long tractor trailer on-site.

COMMENT NO. E10-13

It is also odd that the documentation omits the **inescapable fact that the Metrorail Blue Line runs on some tracks adjacent to the Pacific Railroad's tracks and crosses the fairly busy 41st Street.** So, the fantasyland of this development proposal envisions wide roads, disappearing residences, and a seemingly vanished light-rail line. That is simply not the reality of this site. (I hope to have included in the record some of **Metro's earlier concerns about the proposed project's impact on safety in the 41st Street and Long Beach Avenue area.)**

RESPONSE NO. E10-13

Your comment regarding Metro's comments on the safety of railroad crossings as they relate to 41st

140 feet complies with the requirements of the existing and proposed SELACP and Mobility Plan 2035.

Street and Long Beach Avenue as indicated in their NOP letter submitted on June 26, 2014 included in Appendix II of the Draft EIR has been noted. According to the Addendum to the Traffic Impact Study dated October 3, 2014 (Appendix IX in Volume VI, page 9 of the Draft EIR),

> *The project's traffic distribution shows that a maximum of 28 vehicles will use the 41st Street at-grade crossing to travel outbound to the west during the PM peak hour, while a maximum of 7 vehicles will use 38th Place at-grade crossing to travel inbound from the east during the AM and PM peak hours. These crossings are currently used by existing traffic, and are adequately equipped with various warning and safety devices to alert and prevent traffic crossing during train movements across 41st Street and 38th Place, and allow safe crossings of traffic when there are no train movements. Therefore, no additional safety measures are deemed necessary at these at-grade rail crossings to accommodate traffic from the project.*
>
> *The analysis also indicates that the project trips will not exceed the thresholds of requirements for Metro's Congestion Management Program (CMP) analysis. Similarly, the thresholds of requirements for Caltrans District 7's freeway segment and off-ramp analysis will not be exceeded. Therefore, the project will not have a significant impact on the CMP network and freeway segments or off-ramps. The two at-grade rail crossings near the project sites will be used by the project traffic; however, these rail crossing are currently adequately equipped with warning and safety devices.*

Section II, *Environmental Setting*, page II-1 of the Draft EIR, references and acknowledges the adjacent Metro and freight rail lines, as well as residences in the project vicinity which are further detailed in Response to Comment No. E10-8. As discussed in the *Transportation/Traffic* section of the Draft EIR on page IV.G-16, the project is not proposing any modifications or crossings of the railroad right-of-way.

COMMENT NO. E10-14

The latest "Environmental Setting" says that the site is level. While it is fairly level, yet a map in the record notes that it is a few feet higher at northeastern end than it is at the southwestern end of the property

RESPONSE NO. E10-14

Your comment regarding the topography of the proposed project site has been noted. Section II, *Environmental Setting*, in the Draft EIR (Pg. II-1) includes the following text:

> The elevation of the proposed project site is approximately 200 feet above mean sea level (MSL) with up to a 4-foot transition to surrounding property elevations.

COMMENT NO. E10-15

Also, I realize that not only was there a concerted effort made to pretend that there are no residences south of 41st St. and east of Long Beach Ave., but **they even have the nerve to pretend that the fairly densely populated neighborhood to the west of Long Beach Ave. is mere warehouse / industrial.** Basically, after going about a block west of Long Beach Ave. on 41st Ave., then it is predominately a residential area, and quite a populated one at that. **Thus, do not pretend there are not a bunch of "sensitive receptors" in the immediate as well as greater vicinity of the 41st and Alameda site.**

RESPONSE NO. E10-15

As indicated in Response to Comment No. E10-8, Section II, *Environmental Setting* (on page II-1), of the Draft EIR acknowledges that the area surrounding the proposed project site is developed almost exclusively with light and heavy industrial uses with limited small lot single-family residential homes intermixed with light/industrial warehouse uses to the south and residential areas farther to the west (Figure II.A-5, *Zoning Map*). There are 64 identified sensitive receptors within a 500-foot radius of the proposed project site. See Section IV.B, *Air Quality*, specifically Figure IV.B-1, *Sensitive Receptors* and Figure IV.B-2, *Receptor Grid and Sensitive Receptors*. The sensitive receptors include multifamily residences located to the west, southwest, and south of the proposed project site. Schools and recreation centers are included in the CARB's definition of sensitive receptors, but the nearest school and recreation center are located outside of the 500 foot radius of the proposed project site.

COMMENT NO. E10-16

I will now peer at the map in the record and mention some key parcels in the general area which could be considered "sensitive receptors" or otherwise contributing to safety concerns in the region. **Glancing at page 27 of 781, the Snyder Recreation Center would be the closest site which would have a number of sensitive receptor people (unless one counts individuals with asthma, other ailments, or a baby or elder in closerby residences) I note that the nearest school is Nevin Ave. School -- followed closely by Jefferson High School, then the Roberts Recreation Center, the Ascot Avenue School, and the Holmes Ave. School. Carefully evaluate the likely impacts of added air pollutants on the sensitive receptors at each school and recreation site mentioned above.**

RESPONSE NO. E10-16

Your comment regarding sensitive receptors has been noted. There are 64 identified sensitive receptors within a 500-foot radius of the proposed project site. See Section IV.B, *Air Quality*, specifically Figure IV.B-1, *Sensitive Receptors* and Figure IV.B-2, *Receptor Grid and Sensitive Receptors*. The sensitive receptors include multifamily residences located to the west, southwest, and south of the proposed project site. Schools and recreation centers are included in the CARB's definition of sensitive receptors, but the nearest school and recreation center, including Nevin Avenue School, Jefferson High School, Roberts Recreation Center, Ascot Avenue School, and Holland Avenue School, are located outside of the 500 foot radius of the proposed project site. In addition, an Air Quality Health Risk Assessment (Appendix V in Volume IV of the Draft EIR) was performed in relation to specific sensitive receptors, including those receptors mentioned above (see pages 6–8 of Appendix V of the Draft EIR). This analysis identified the point of maximum impact to all receptors, residential receptors, sensitive receptors, and receptors of interest. The point of maximum impact (PMI) to any receptor, which is Receptor P2, is 0.00135 µg/m3 for the modeled annual average diesel particulate matter (DPM) concentration. (All receptors are shown in Figure IV.B-2.) While there are no chronically exposed persons at that receptor, there are off-site workers immediately adjacent to the project site so this PMI concentration was assumed to be the maximum off-site worker receptor. The PMI for residential receptors is Receptor NR3, which has an annual average DPM concentration of 0.00020 $\mu g/m^3$ and is the Maximum Exposed Individual Residence (MEIR). The PMI for sensitive receptors is Receptor SR1, the Amino Middle School, which has an annual average DPM concentration of 0.00003 $\mu g/m^3$. The PMI for receptors of interest is Receptor OR-B, the Los Angeles Regional Food Bank, which has an annual average DPM concentration of 0.00101 $\mu g/m^3$. Table IV.B-11 of the Draft EIR contains a summary of the health impact results from DPM on these key sensitive receptors. The potential health risk from diesel fueled trucks is very small, with a maximum non-cancer health impact (HI) of 0.0003, and a maximum potential cancer risk of 2.6×10^{-7} or 0.3 in a million. The traditional threshold used to evaluate potential non-cancer risk is a HI of 1.0, and the public notification threshold for cancer risk is 10×10^{-6} or 10 in a million as set by SCAQMD Rule 1401.

The maximum potential risks from this facility are less than 0.03 percent of the non-cancer threshold and less than 3 percent of the cancer threshold. Therefore, the proposed project would not result in the significant human health risks related to diesel emissions.

COMMENT NO. E10-17

Increased diesel emissions, increased congestion, inadequate street size, and other aspects relating to the project will certainly add to the already excessive toxic burden which the Alameda - Central community carries at the aforementioned schools and recreation centers, as well as otherwise. While I personally have not surveyed the neighborhood for nursing / retirement homes, or for places for medical or psychiatric care, please identify such facilities in the EIR if they are within 3/4 of a mile of the 41st and Alameda site.

RESPONSE NO. E10-17

Please see Response to Comment No. E10-16 regarding air quality impacts to sensitive receptors. In summary, there are 64 identified sensitive receptors within a 500-foot radius of the proposed project site. While certain medical facilities qualify as sensitive receptors, there are none within the 500 foot radius of the proposed project site. The CARB Land Use Handbook advises a range of analysis up to 500 feet for relative cancer risk for distribution centers based on PM emissions from diesel truck travel in and out of distribution centers.

COMMENT NO. E10-18

With the increased congestion on all 4 surrounding streets, as well as the proposed surge in vehicle journeys associated with the project, **this increase in emissions which clearly has an impact on many sensitive receptors must be carefully analyzed in the EIR.** In addition, **these emissions, plus the impact on health and safety of sensitive receptors** in the neighborhood, must also be carefully analyzed in **an Environmental Justice context.**

RESPONSE NO. E10-18

CEQA centers on whether a project may have a significant effect on the physical environment (CEQA Guidelines, 15064(d)). The purpose of an environmental impact report is to identify the significant effects on the environment of a project, to identify alternatives to the project, and to indicate the manner in which those significant effects can be mitigated or avoided (Pub. Res. Code, §21002.1 subd. (a)). Environmental justice is not considered an area of impact under CEQA, and CEQA does not ask that a project mitigate preexisting conditions. As noted in CEQA Guidelines Section 15064(b), the significance of an activity may vary with the environmental setting. Where there already is a high pollution burden on a community, the relevant question is whether an additional amount of pollution should be considered significant in light of the serious nature of the existing problem.[24]

The Existing Conditions section in Section IV.B *Air Quality* of the Draft EIR includes ambient air quality data gathered from the local air quality monitoring stations. The average concentrations and days above the standard for each criteria air pollutant are listed in Table IV.B-6 *Summary of 2010-2012 Ambient Air Quality Data in the Proposed Project Vicinity* on page IV.B-11 of the Draft EIR. The Air Quality impact analysis relative to the impacts of the proposed project is further detailed below, and is located in Section

[24] Harris, Kamala D. 10 July 2012. *Environmental Justice at the Local and Regional Level: Legal Background*. Prepared by State of California Department of Justice. Available at: http://oag.ca.gov/sites/all/files/agweb/pdfs/environment/ej_fact_sheet.pdf

IV.B *Air Quality* of the Draft EIR. In the Draft EIR, sensitive receptors are defined on page IV.B-11. There are two maps showing their locations: Figure IV.B-1 *Sensitive Receptors* and Figure IV. B-2 *Receptor Grid and Sensitive Receptors*.

As mentioned in Response to Comment Nos. E10-15 and E10-16, there are 64 identified sensitive receptors within a 500-foot radius of the proposed project site. See Section IV.B, *Air Quality*, specifically Figure IV.B-1, *Sensitive Receptors* and Figure IV.B-2, *Receptor Grid and Sensitive Receptors*. The sensitive receptors include multifamily residences located to the west, southwest, and south of the proposed project site. Schools and recreation centers are included in the CARB's definition of sensitive receptors, but the nearest school and recreation center are located outside of the 500 foot radius of the proposed project site. In addition, an Air Quality Health Risk Assessment (Appendix V in Volume IV of the Draft EIR) was performed in relation to specific sensitive receptors. This analysis identified the point of maximum impact to all receptors, residential receptors, sensitive receptors, and receptors of interest. Table IV.B-11 of the Draft EIR contains a summary of the health impact results from diesel particulate matter on these key sensitive receptors. The potential health risk from diesel fueled trucks is very small, with a maximum non-cancer health impact (HI) of 0.0003, and a maximum potential cancer risk of 2.6×10^{-7} or 0.3 in a million. The traditional threshold used to evaluate potential non-cancer risk is a HI of 1.0, and the public notification threshold for cancer risk is 10×10^{-6} or 10 in a million as set by SCAQMD Rule 1401. The maximum potential risks from this facility are less than 0.03 percent of the non-cancer threshold and less than 3 percent of the cancer threshold. Therefore, the proposed project would not result in the significant human health risks related to diesel emissions.

In addition to the cancer risk, operational emissions associated with the proposed project for the six main criteria air pollutants are quantified in Table IV.B-9, *Unmitigated Estimated Daily Operational Emissions*, of the Draft EIR, and were found to be below thresholds of significance established by SCAQMD. Therefore, the proposed project would not result in significant human health risks related to diesel emissions. Further details on the air quality impacts analysis in the operational phase can be found in pages IV.B18 –B22 of the Draft EIR.

The construction phase air quality impact analysis can be found in the Impact Analysis portion of Section IV.B *Air Quality* of the Draft EIR. Construction related toxic air contaminants (TACs) from diesel particulate emissions will be short-lived (3 months), and therefore do not require a Health Risk Assessment (HRA) from the Office of Environmental Health Hazard Assessment (OEHHA). Diesel particulate emissions only affect the population on a long-term (70-year) basis for cancer impacts, so the impact of short-term TACs from the construction of the proposed project is considered less than significant, as analyzed in Section IV.B (pages IV.B-15 through -18) of the Draft EIR. Construction emissions were analyzed for the six main criteria air pollutants as evident in Table IV.B-8. Emissions from VOCs, NOx, CO, SOx, and $PM_{2.5}$ were calculated to be below the SCAQMD significance threshold. PM_{10}, does have a significant impact during the construction phase, but it can be reduced to below the level of significance with mitigation measures.

COMMENT NO. E10-19

IMPORTANT SUBSTANCES FOR WHICH TO TEST:

I find 14 samples at 5 foot depth, with perhaps two at a 15-foot depth as part of a soil vapor probe, to be an inadequate characterization of this heavily abused site for toxic materials.

RESPONSE NO. E10-19

Your comment regarding the adequacy of hazardous soil assessment has been noted. Potential hazards

and hazardous materials were evaluated via a Phase I Environmental Site Assessment (Phase I ESA) prepared by SCS Engineers in June 2013 (Appendix VII in Volume V of the Draft EIR), a Human Health Screening Evaluation (HHSE) prepared by Kleinfelder, Inc. (Appendix VIII in Volume VI of the Draft EIR), an environmental regulatory database compilation, and a review of published and unpublished literature.

The Phase I ESA revealed evidence of conditions indicative of releases or threatened releases of hazardous substances. The Property has a long and varied history of residential and commercial/industrial uses. Many of the identified commercial/industrial uses are of types typically associated with the use or storage of hazardous materials (see Figure IV.E-1, *Historic Hazardous Materials Land Uses at 4051 South Alameda Street Project Site*). Consequently, these activities pose a risk of contamination on the Property. At least five soil investigations have been conducted on the Property. While no significant contamination (with respect to commercial land use) has been detected, low concentrations of Volatile Organic Compounds (VOCs) were identified in scattered soil samples. The results of the soil vapor survey appeared consistent with the results of previous soil investigations, that is, trace concentrations of VOCs were detected, primarily in the northwestern portion of the property. The VOC vapor concentrations were, for the most part, less than generally accepted regulatory limits (CHHSLs) for commercial/industrial land use. Based on the Phase I ESA, there is no expected potential for the release of hazardous materials at the current vacant project site. There have been past land uses on adjoining property that likely have contributed to the presence of some hazardous materials on those sites, however no recognized environmental conditions regarding the proposed project site being exposed to contamination migrating from off-site sources have been observed (p. IV.E-4 of the Draft EIR). The Phase I ESA indicated that the concentrations of herbicides, organochlorine pesticides, hexavalent chromium, VOCs, SVOCs, PCBs, and TPH were generally below regulatory limits for commercial land use, however elevated concentrations of certain metals (primarily lead and arsenic) were detected in a limited number of samples but below levels that would pose a risk or hazards to people or property (pg. IV.E-9-10 of the Draft EIR).

As further summarized in the HHSE, the concentrations of all chemicals detected at least once in any soil sample were below regulatory levels except arsenic and lead. Four of 141 soil samples contained arsenic at a concentration that exceeded the background concentration of 12 mg/kg, however, the average and 95% upper confidence limit of the average concentration (95UCL) were below the background concentration, which indicates that further investigation or mitigation of arsenic is not necessary to protect public health or the environment. Further investigation or mitigation is not considered to be warranted since the 95% upper confidence limit of the average concentration is 3.9 mg/kg as compared to the estimated background concentration of 12 mg/kg; and only four of 141 soil samples contained arsenic at a concentration greater than 12 mg/kg. Lead was evaluated by comparison to the Cal/EPA limit for soil on industrial sites (320 mg/kg). Four of 142 soil samples contained lead at a concentration greater than 320 mg/kg and three of those samples only slightly exceeded the limit (334, 335, and 354 mg/kg). The maximum concentration of lead was 726 mg/kg. The average and 95UCL concentrations of lead were well below the industrial soil limit indicating that further investigation or mitigation of lead is not necessary to protect public health or the environment. Because actual exposures of subsurface utility workers is likely to be best represented by an average of site soil concentrations, and because the 95% upper confidence limit of the average concentration is 92.2 mg/kg as compared to the acceptable concentration of 320 mg/kg, further investigation or mitigation is not considered to be warranted based on the presence of lead in site soil. For arsenic, the standard would be DTSC (2009), Arsenic Strategies, Determination of Arsenic Remediation, Development of Arsenic Cleanup Goals. Department of Toxic Substances Control, California Environmental Protection Agency, Sacramento, January 16, 2009 (included as Appendix L to the Final EIR). For lead, the standard would be DTSC (2014), Human Health Risk Assessment (HHRA) Note 3, DTSC Recommended Methodology for Use of U.S. EPA Regional

Screening Levels (RSLs) in the Human Health Risk Assessment Process at Hazardous Waste Sites and Permitted Facilities, July 14, 2014 (included as Appendix M to the Final EIR).

The site was found to be suitable for commercial/industrial development based on the conceptual site model described in the HHSE (Kleinfelder 2014), which identified sub-surface utility workers and on-site employees as appropriate human receptor groups, and as presented in a comparison of the maximum concentration of any analyte detected at least once in soil or soil vapor to levels of regulatory concern required by the U.S. Environmental Protection Agency (EPA). The HHSE methods, approach, and findings are discussed in more detail in the following responses. The HHSE can be found in Volume VI, Appendix VIII of the Draft EIR.

The HHSE was performed to evaluate whether Chemicals of Potential Concern (COPCs) were present in environmental media (soil, soil vapor, or groundwater) at concentrations that may be associated with adverse health effects under future commercial land uses.

Several Phase I and Phase II environmental site investigations have been performed on the subject site since the 1990s. Reports of these investigations were reviewed to develop a conceptual site model, to identify COPCs, and to identify appropriate exposure point concentration estimates for the health screening evaluation. These reports are included as Appendices D through K of the Final EIR and Appendix VII to Draft EIR. The following reports were reviewed in preparation of the HHSE and are included as Appendices D through K in the Final EIR:

- *Preliminary Health Risk Evaluation – Lancer Site*, January 18, 1995. Prepared by Hart Crowser, Inc. (excerpt)
- *Site Investigation Report – Lancer Site*, October 29, 2003. Prepared by Pacific Edge Engineering, Inc.
- *Phase I Environmental Site Assessment*, September 1, 2006. Prepared by Professional Service Industries, Inc. (PSI).
- *Phase II and Limited Phase III Environmental Site Assessment*, October 9, 2006. Prepared by PSI.
- *Phase I/II Environmental Site Assessment,* May 25, 2006. Prepared by Advantage Environmental Consultants, LLC.
- *Hexavalent Chromium Analysis*, November 3, 2006. Prepared by PSI.
- *Preliminary Risk Assessment*, May 31, 2007. Prepared by PSI.
- *Soil Vapor Survey*, March 2011. Prepared by SCS Engineers.
- *Phase I Environmental Site Assessment*, June 2013. Prepared by SCS Engineers. (Appendix VII to Draft EIR)

Collectively, these reports provide a representative summary of environmental conditions on the subject site based on:

1. The number and location of soil and soil vapor samples that have been collected and analyzed for chemical constituents of potential concern based on past land uses. As summarized in Phase I ESA (page 15)and documented in the reports identified above, 176 soil samples have been collected from 146 locations across the subject site, and 16 soil vapor samples have been collected from 14 locations across the subject site. The sampling locations were distributed to provide information representative of conditions across the site.

2. The breadth of chemical analyses performed on the soil and soil vapor samples collected

from the subject site. As summarized in the HHSE (page 2), the soil samples were analyzed for petroleum hydrocarbons by EPA Methods 418.1 and 8015M, SVOCs by EPA Method 8270C, VOCs by EPA Method 8260B, California Title 22 metals by EPA Method 6010B, hexavalent chromium by EPA Method 7199, organochlorine pesticides and PCBs by EPA Method 8081A/8082, and herbicides by EPA Method 8151. Soil vapor samples collected from five or 15 feet below ground surface were analyzed for VOCs by EPA Method 8260B. The sample types and analytical methods broadly provide information representative of conditions across the site. Each chemical type generally representative of environmental conditions on property developed in an urban setting was addressed by the analyses performed.

3. The quality of the analytical data developed from the analysis of environmental samples collected from the subject site. As summarized in the HHSE (page 2), laboratory analytical reports, including analysis of quality assurance/quality control samples, were available and reviewed for most soil data and for the soil vapor data. The analytical results appear to be of adequate quality and suitable for use in a risk assessment based on the analysis of laboratory blank samples, LCS, matrix spike and matrix spike duplicate samples, all of which were within acceptable control ranges. Reporting limits apparently were sufficiently low to detect concentrations of health concern.

Based on the HHSE, understanding the regulatory points of departure for risk management, a cumulative cancer risk of 1×10^{-6} indicates that there may be one additional case of cancer for every 1,000,000 people in a population exposed to the COPCs under the exposure conditions identified in the HHSE. To put this cancer risk in perspective, the background rate of cancer in the United States is approximately 1 in 3. Therefore, of the roughly 300,000,000 citizens of the United States, 100,000,000 can expect to develop some form of cancer at some time in their lives. If the entire population of the United States were to reside on a site where, due to chemical contamination, the excess lifetime cancer risk was 1×10^{-6}, then an additional 300 individuals might develop some form of cancer as a result, and the total number of cancer cases would be 100,000,300.

As indicated on page 10 of the HHSE, the analysis was performed consistent with the guidance provided by the DTSC, using Risk Screening Levels for estimating cancer risk and non-cancer risk. Threshold values for risk management decisions based on Cal/EPA and federal EPA policy are 1×10^{-6} (one in one million) for cancer risks and a non-cancer hazard quotient of 1.0. For lead, which is evaluated by different methodology than all other constituents of concern, the threshold for risk management decisions based on Cal/EPA policy is a soil concentration of 320 mg/kg; therefore, where lead concentrations in soil are less than 320 mg/kg, action is not required.

The results of the analysis are provided in Tables 4 and 5 of the HHSE for the construction scenario based on a subsurface utility worker. Using the methods described in the HHSE, the total cancer risk was determined to be 7×10^{-7} which is less than the Cal/EPA regulatory point of departure of 1×10^{-6} for risk management decisions based on cancer risk. The non-cancer risk was 0.867 which is less than the Cal/EPA regulatory point of departure of 1.0 for risk management decisions based on non-cancer risk (pg. IV.E-9 of the Draft EIR). The results of the analysis are provided in Tables 6 and 7 of the HHSE for the operational phase of the project based on an analysis for potential soil vapor intrusion. Using the methods described in the HHSE, the total cancer risk was determined to be 6×10^{-7} which is less than the Cal/EPA regulatory point of departure of 1×10^{-6} for risk management decisions based on cancer risk. The non-cancer risk was 0.009 which is less than the Cal/EPA regulatory point of departure of 1.0 for risk management decisions based on non-cancer risk.

The Department of Toxic Substances Control (DTSC) has reviewed the site characterization and health

risk assessment for the site and has concluded that the site is suitable for Industrial/Commercial use, and that future development or rezoning of the property for other than Industrial/Commercial use would require additional analysis and risk evaluation by DTSC to determine the suitability of the site for such use (included as Appendix N to the Final EIR).[25]

COMMENT NO. E10-20

I call for a thorough assessment of hazards and hazardous materials to be included in the EIR. **Such thorough testing would involve numerous sampling sites within each acre within the 41st and Alameda site.** A mere one sample per acre is certainly inadequate if one is concerned about health and safety. I am not an expert on sampling, but the more the better, and taking samples at differing depths could bring useful information forward.

RESPONSE NO. E10-20

Your comment regarding the assessment of hazards and hazardous materials at the project site, specifically regarding variety of soil samples, has been noted. As stated in Response to Comment No. E10-19, a Phase I ESA was prepared by SCS Engineers in June 2013 (Appendix VII in Volume V of the Draft EIR), and a Human Health Screening Evaluation (HHSE) was prepared by Kleinfelder, Inc. (Appendix VIII in Volume VI of the Draft EIR) in accordance with California Environmental Protection Agency (Cal/EPA) guidance as described in the Preliminary Endangerment Assessment (PEA) Guidance Manual. Research of the project site also included the review of published and unpublished literature and the use of an environmental regulatory database compilation. The review of the environmental regulatory database compilation does not indicate that the site is included on a list of hazardous materials sites compiled pursuant to the Government Code Section 65962.5. Response to Comment No. E10-19 provides further detail on specifics of the soil sampling conducted at the project site.

COMMENT NO. E10-21

The toxic materials which must be tested for (in the EIR) include: Total Petroleum Hydrocarbons (TPH), VOCs, SVOCs, CCR Title 22 metals, organochlorine pesticides, PCBs, pentachlorophenol, creosote, formaldehyde, xylene, benzene, toluene, 2,4-D , DDT / DDE, glyphosate, atrazine, ARSENIC, lead, fluoride, HEXAVALENT CHROMIUM, cadmium, chromium, chromium-6, chromium-12, perchlorate, TCE, Tetrachloroethene, PCE, diesel constituents and breakdown products, as well as for substances one might find from a color and dye company and from a dry-cleaning company once on the site.

RESPONSE NO. E10-21

Your comment regarding the inclusion of toxic materials testing in the Draft EIR has been noted. Results from several surface and subsurface level investigations that were conducted at the proposed project site indicated that the concentrations of herbicides, organochlorine pesticides, hexavalent chromium, volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), polychlorinated biphenyls (PCBs) and total petroleum hydrocarbons (TPH) were generally below regulatory limits for commercial land use (pg. IV.E-4 of Draft EIR). In addition, the HHSE, prepared by Kleinfelder Inc. (Appendix VIII in Volume VI of the Draft EIR) in accordance with Cal/EPA guidance as described in the Preliminary Endangerment Assessment (PEA) Guidance Manual determined that the project site does not pose a risk

[25] Department of Toxic Substances Control. 22 December 2015. Letter from Brownfields and Environmental Restoration Program—Chatsworth Office, Haissam Y. Salloum, Senior Engineer, to City of Los Angeles, Department of City Planning, William Lamborn.

or hazards to people or property from VOCs (pg. IV.E-9 of the Draft EIR). Analysis of soil samples was performed for the compounds identified in the comment as part of one or more investigations at the subject site as indicated in Table 2, Section 3, of the HHSE in Appendix VIII. The HHSE determined that the project site does not pose a risk or hazards to people or property from arsenic or lead, because arsenic levels on the subject property are an order of magnitude lower than background levels. The concentrations of all chemicals detected at least once in any soil sample were below regulatory levels except arsenic and lead. Four of 141 soil samples contained arsenic at a concentration that exceeded the background concentration of 12 mg/kg, however, the average and 95% upper confidence limit of the average concentration (95UCL) were below the background concentration, which indicates that further investigation or mitigation of arsenic is not necessary to protect public health or the environment. Lead was evaluated by comparison to the Cal/EPA limit for soil on industrial sites (320 mg/kg). Four of 142 soil samples contained lead at a concentration greater than 320 mg/kg and three of those samples only slightly exceeded the limit (334, 335, and 354 mg/kg). The maximum concentration of lead was 726 mg/kg. The average and 95UCL concentrations of lead were well below the industrial soil limit indicating that further investigation or mitigation of lead is not necessary to protect public health or the environment. For arsenic, the standard would be DTSC (2009), Arsenic Strategies, Determination of Arsenic Remediation, Development of Arsenic Cleanup Goals. Department of Toxic Substances Control, California Environmental Protection Agency, Sacramento, January 16, 2009 (included as Appendix L to the Final EIR). For lead, the standard would be DTSC (2014), Human Health Risk Assessment (HHRA) Note 3, DTSC Recommended Methodology for Use of U.S. EPA Regional Screening Levels (RSLs) in the Human Health Risk Assessment Process at Hazardous Waste Sites and Permitted Facilities. July 14, 2014 (included as Appendix M to the Final EIR). Analysis of soil samples was performed for the chemicals identified in the comment with the possible exception of glyphosate, atrazine, fluoride, and perchlorate. Glyphosate and atrazine, however, have relatively short half-lives once released to the environment. Glyphosate in particular degrades rapidly. Possibly fluoride was used in the past as a pesticide or herbicide on the site, however, there is no record of such use. Fluoride is also naturally occurring as well as a food additive and therapeutic agent. Perchlorate is not expected to be present based on a lack of site history involving pyrotechnic manufacture or use. Analyses would not ordinarily be performed for atrazine, glyphosate, fluoride, or perchlorate unless there is reason to believe those analytes were released on a given site. The half-life of glyphosate is 2-7 days and the half-life of atrazine is 30-35 days in dry soil. So it would not be expected to find these in soil on the subject site.[26] For more detail on the studies focused on hazards and hazardous materials for the project site, please see Response to Comment Nos. E10-19 and E10-20.

COMMENT NO. E10-22

In addition, test for these components and/or breakdown products of diesel. I note that **Table 1: Substances in Diesel Exhaust Listed by Cal EPA as Toxic Air Contaminants mentions these:** acetaldehyde; acrolein; aniline; antimony compounds; arsenic; benzene; beryllium compounds; biphenyl; bis[2-ehtylhexyl)phthalate; 1,3-butadiene; cadmium; chlorine; chlorobenzene; chromium compounds; cobalt compounds; creosol isomers; cyanide compounds; dibutylphthalate; dioxins and dibenzofurans; ethyl benzene; formaldehyde; inorganic lead; manganese compounds; mercury compounds; methanol; mehtyl ethyl ketone; naphthalene; nickel; 4-nitrobiphenyl; phenol; phosphorus; polycyclic organic matter, including polycyclic aromatic hydrocarbons (PAHs) and their derivatives; propionaldehyde; selenium compounds; styrene; toluene; xylene isomers and mixtures; o-sylenes; m-xylenes; and p-xylenes. Please test for some of these components of diesel emissions in soil at various sites throughout the approximately 14 acres.

[26] U.S. National Library of Medicine. Toxnet Toxicology Data Network. Available online at: http://toxnet.nlm.nih.gov

RESPONSE NO. E10-22

Your comment regarding additional testing for hazards and hazardous materials at the project site has been noted. As explained in Response to Comment Nos. E10-19, E10-20, and E10-21, the HHSE was prepared in compliance with Cal/EPA guidance as described in the Preliminary Endangerment Assessment (PEA) Guidance Manual. The HHSE was based on the following five steps:

- Preparation of a conceptual site model
- Identification of chemicals of concern for the site (COCs)
- Exposure assessment
- Identification of screening levels
- Risk characterization (pg. IV.E-5 of the Draft EIR)

Analysis of soil samples was performed for the compounds identified in the comment as part of one or more investigations at the subject site as indicated in Table 2, Section 3, of the HHSE in Appendix VIII.

COMMENT NO. E10-23

Some review of the earlier documentation indicated that certain substances were found at levels of concern.

RESPONSE NO. E10-23

Your comment regarding levels of certain substances that presented concerns in earlier documentation has been noted. Section IV.E *Hazards and Hazardous Materials* of the Draft EIR makes reference to elevated concentrations of certain metals (primarily lead and arsenic) in a limited number of samples, but clarifies that through analytical results, the data do not indicate any significant release of contamination on the property (pg. IV.E-4 and IV.E-10 of the Draft EIR). Based on Appendix G of the CEQA Guidelines, the proposed project would not have significant impacts regarding issues related to hazards and hazardous materials (pg. IV.E-8 of the Draft EIR). Please refer to Response to Comment No. E10-19 for a detailed description of testing and review of documentation supporting these findings.

In addition, the Department of Toxic Substances Control (DTSC) has reviewed the site characterization and health risk assessment for the site and has concluded that the site is suitable for Industrial/Commercial use, and that future development or rezoning of the property for other than Industrial/Commercial use will require additional analysis and risk evaluation by DTSC to determine the suitability of the site for such use (included as Appendix N to the Final EIR).[27]

COMMENT NO. E10-24

Seeing that an AQMD official or staffer advised that the earlier incarnation of this proposed development be mitigated by having a ramp for traffic to travel all the way from the 41st and Alameda site up to the Santa Monica Freeway, does it sound like the AQMD considers this fairly similar development (except on even more of the site) of regional significance?

RESPONSE NO. E10-24

[27] Department of Toxic Substances Control. 22 December 2015. Letter from Brownfields and Environmental Restoration Program—Chatsworth Office, Haissam Y. Salloum, Senior Engineer, to City of Los Angeles, Department of City Planning, William Lamborn.

Your comment regarding the SCAQMD comments on the previously proposed project has been noted. The proposed project is different from the earlier version and is therefore being reviewed relative to its own impacts. As the lead agency under CEQA, the City has determined that the proposed project is not of regional significance pursuant to Section 15206 of the CEQA Guidelines, which identifies a proposed project of statewide, regional, or areawide significance as one that meets the following criteria:

> (b)(2) A project has the potential for causing significant effects on the environment extending beyond the city or county in which the project would be located. Examples of the effects include generating significant amounts of traffic or interfering with the attainment or maintenance of state or national air quality standards. Projects subject to this subdivision include:
>
> > (A) A proposed residential development of more than 500 dwelling units.
> > (B) A proposed shopping center or business establishment employing more than 1,000 persons or encompassing more than 500,000 square feet of floor space.
> > (C) A proposed commercial office building employing more than 1,000 persons or encompassing more than 250,000 square feet of floor space.
> > (D) A proposed hotel/motel development of more than 500 rooms.
> > (E) A proposed industrial, manufacturing, or processing plant, or industrial park planned to house more than 1,000 persons, occupying more than 40 acres of land, or encompassing more than 650,000 square feet of floor area.

The proposed project would occupy approximately 353,375 square feet of warehouse space, 112,745 square feet of office space, and 14,000 square feet of manufacturing space for a total of 480,120 square feet and would employ 994 persons. The proposed project meets none of the above criteria. As a result, the City has determined that it is not of regional significance.

COMMENT NO. E10-25

Let me quote three paragraphs which are the third to fifth paragraphs under "Background" which is beneath "1. Introduction". The third paragraph reads: "At least five phases of environmental soil investigation has been conducted on the Property with testing for total petroleum hydrocarbons TPH), volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), metals, hexavalent chromium, organochlorine pesticides, polychlorinated biphenyls (PCBs) and herbicides. No significant concentrations were detected for most of these chemicals of potential concern.

However, elevated concentrations of certain metals were detected in a limited number of samples, but in no discernable pattern. A limited risk assessment addressed the 'elevated' arsenic concentrations and concluded that the risk from arsenic did not require remediation or mitigation *measures beyond what would normally be appropriate for construction sites.* **It has been further concluded that additional characterization of the soil for metals may be warranted if the Property were to be used for residential purposes, or soils were to be removed from the Property.**

RESPONSE NO. E10-25

Your comments regarding the findings from the ESA and literature review of previous studies have been noted. Please see Response to Comment No. E10-19. The specific compounds for which testing was performed were identified in Section 3, including Table 2, of the HHSE (Kleinfelder 2014, Appendix VIII of the Draft EIR). Comparison of the maximum concentration reported for each chemical of concern to regulatory levels was discussed in Section 5 and presented in Tables 4 and 5 of the HHSE. As reported in the HHSE, no chemical of concern was present at a concentration that exceeded the EPA Regional Screening Levels (RSL) for industrial land use (please also see pages IV.E-9 and IV.E-10 of the Draft

EIR). Soil is not proposed to be removed from the property. Regarding arsenic levels, four of 141 soil samples contained arsenic at a concentration that exceeded the background concentration of 12 mg/kg, however, the average and 95% upper confidence limit of the average concentration (95UCL) were below the background concentration, which indicates that further investigation or mitigation of arsenic is not necessary to protect public health or the environment. Further investigation or mitigation is not considered to be warranted since the 95% upper confidence limit of the average concentration is 3.9 mg/kg as compared to the estimated background concentration of 12 mg/kg; and only four of 141 soil samples contained arsenic at a concentration greater than 12 mg/kg.

Residential land use is not contemplated for this property and the Draft EIR was performed to address commercial/industrial land use; therefore, as noted in the HHSE, residential land use was not evaluated. In addition, the Department of Toxic Substances Control (DTSC) has reviewed the site characterization and health risk assessment for the site and has concluded that the site is suitable for Industrial/Commercial use, and that future development or rezoning of the property for other than Industrial/Commercial use will require additional analysis and risk evaluation by DTSC to determine the suitability of the site for such use (included as Appendix N to the Final EIR).[28]

COMMENT NO. E10-26

In addition, low concentrations of VOCs were identified in scattered soil samples in earlier investigations. No soil vapor assessment has been conducted on the Property to date. Consequently, it is not clear whether these VOC detections resulted from small release incidents or are indicative of a wider, more significant problem. **A comprehensive Property-wide soil vapor assessment was recommended."**

RESPONSE NO. E10-26

Your comment regarding the extent to which a soil vapor assessment was performed has been noted. As discussed in the soil vapor report prepared in 2011 by SCS Engineers, a comprehensive, property-wide soil vapor assessment was performed to address the presence of volatile organic compounds based on historical site uses and as reported in environmental site investigations. The March 2011 Soil Vapor Survey has been included as Appendix K to this Final EIR. SCS (2011) concluded that, based on a comparison to the now vacated California Human Health Screening Levels (CHHSLs), there was no evidence of a significant release or vapor intrusion risk. In the HHSE (see Section 5.5 and Tables 6 and 7) (Kleinfelder 2014), and consistent with current DTSC policy, the SCS (2011) soil vapor data was re-evaluated using EPA Regional Screening Levels (RSLs) and the conclusions of the SCS report were corroborated i.e., the potential health hazards that may be associated with the vapor intrusion pathway under commercial land use assumptions were below a level that requires further investigation or mitigation.

COMMENT NO. E10-27

Let us re-examine the earlier sentence (3 paragraphs up) that says: "No significant concentrations were detected for most of these chemicals of potential concern." This is an unusual way of saying the site is doing alright in regards to its contamination by "most" chemicals, but **it does not state clearly which precise substances were tested that were found beyond regulatory levels.**

[28] Department of Toxic Substances Control. 22 December 2015. Letter from Brownfields and Environmental Restoration Program—Chatsworth Office, Haissam Y. Salloum, Senior Engineer, to City of Los Angeles, Department of City Planning, William Lamborn.

RESPONSE NO. E10-27

Your comment regarding the testing of chemicals of potential concern has been noted. The specific compounds for which testing was performed were identified in Section 3, including Table 2, of the HHSE (Kleinfelder 2014). The COPCs addressed in the HHSE included petroleum hydrocarbons, polynuclear aromatic hydrocarbons (PAHs), volatile organic compounds (VOCs), and organochlorine pesticides Comparison of the maximum concentration reported for each chemical of concern to regulatory levels was discussed in Section 5 and presented in Tables 4 and 5 of the HHSE. As reported in the HHSE, no chemical of concern was present at a concentration that exceeded the EPA Regional Screening Levels (RSL) for industrial land use. The concentrations of all chemicals detected at least once in any soil sample were below regulatory levels except arsenic and lead. Four of 141 soil samples contained arsenic at a concentration that exceeded the background concentration of 12 mg/kg, however, the average and 95% upper confidence limit of the average concentration (95UCL) were below the background concentration, which indicates that further investigation or mitigation of arsenic is not necessary to protect public health or the environment. Lead was evaluated by comparison to the Cal/EPA limit for soil on industrial sites (320 mg/kg). Four of 142 soil samples contained lead at a concentration greater than 320 mg/kg and three of those samples only slightly exceeded the limit (334, 335, and 354 mg/kg). The maximum concentration of lead was 726 mg/kg. The average and 95UCL concentrations of lead were well below the industrial soil limit indicating that further investigation or mitigation of lead is not necessary to protect public health or the environment. For arsenic, the standard would be DTSC (2009), Arsenic Strategies, Determination of Arsenic Remediation, Development of Arsenic Cleanup Goals. Department of Toxic Substances Control, California Environmental Protection Agency, Sacramento, January 16, 2009 (Appendix L to the Final EIR). For lead, the standard would be DTSC (2014), Human Health Risk Assessment (HHRA) Note 3, DTSC Recommended Methodology for Use of U.S. EPA Regional Screening Levels (RSLs) in the Human Health Risk Assessment Process at Hazardous Waste Sites and Permitted Facilities. July 14, 2014 (Appendix M to the Final EIR).

COMMENT NO. E10-28

Are all the substances that exceeded regulatory levels mentioned in the first paragraph (immediately below the line of asterisks) or in the following paragraph (arsenic and perhaps other metals)? **Please clearly state which toxic materials were found at the site which exceeded the "usual" regulatory level. Please also make another distinction -- that would be how many (and identify) the toxic materials that would need remediation if the site was to host residences (or if soil was to be removed from the site).** There are repeated references (especially by SCS Engineers reports) that a number of toxic materials are too high if the area was to be residential, but **apparently a fairly high toxic material level is acceptable if a site is merely a "construction" or "industrial" site.** Is part of this logic that people may well spend over half their 24-hour day at their residence, but spend closer to 8 or 9 hours at their workplace? However, sweat-shops are known for long hours. Should hours of a worker at the 41st and Alameda site be limited so that they do not receive excessive exposure from toxic materials lurking in the soil? Please explain. **Also explain how much soil would need to be "removed" from the site in order to trigger a more thorough investigation and remediation of such toxic substances. Are there plans for the removal of any soil from the 41st and Alameda site? Explain…**

RESPONSE NO. E10-28

Your comment regarding the maximum concentrations of chemicals of concern on the proposed project site has been noted. The specific compounds for which testing was performed were identified in Section 3, including Table 2, of the HHSE (Kleinfelder 2014). Comparison of the maximum concentration reported for each chemical of concern to regulatory levels was discussed in Section 5 and presented in Tables 4 and 5 of the HHSE. As reported in the HHSE, no chemical of concern was present at a

concentration that exceeded the RSL for industrial land use. In addition, comparisons of arsenic and chemicals of concern concentrations to Cal/EPA and DTSC regulatory levels can be found on pages IV.E-9 and IV.E-10 of the Draft EIR, and further information in Response to Comment No. E10-19 and No. E10-27. Residential land use is not contemplated for this property and the Draft EIR was performed to address commercial/industrial land use; therefore, as noted in the HHSE, residential land use was not evaluated. No soil is proposed to be removed from the proposed project site.

COMMENT NO. E10-29

I will now quote the "5 REGULATORY LIMITS" portion of the March 2011 soil vapor study by SCS Engineers: "The California EPA Office of Environmental Health Hazard Assessment (OEHHA) published the *Human-Exposure-Based Screening Numbers Developed to Aid Estimation of Cleanup Costs for Contaminated Soil*, dated November 2004, revised January 2005. Within this document, California Human Health Screening Levels, or CHHSLs, were developed for certain VOCs in soil gas at 5 feet below buildings for vapor intrusion into structures under residential and industrial / commercial land use scenarios. The CHHSLs are based on general assumptions regarding soils and buildings at VOC-impacted sites, the chemical characteristics of various VOCs, and potential health risks. **The OEHHA guidance states that CHHSLs are 'useful to get a general understanding of potential problems with a site, but cannot be used to assess actual health risks.' Further, OEHHA has stated that CHHSLs have 'no regulatory effect, and have been published solely as a reference value** that may be used by citizen groups, community organizations, property owners, developers, and local government officials to estimate the degree of effort that may be necessary to remediate a property.'

RESPONSE NO. E10-29

There are two regulatory frameworks that govern the analysis of VOCs. One is for air quality and another one is for toxic air contaminants (TACs) in the soil. The air threshold can be found in the SCAQMD Air Quality Significance Threshold Table[29]. This section provides the mass daily threshold for VOCs during construction (75 lbs/day) and operation (50 lbs/day).

SCAQMD's Rule 1401 sets limits for TACs, including both carcinogens and non-carcinogens, for new and modified existing permit units. The analysis in the HHSE and Draft EIR was performed as per the respective VOC and TAC regulatory frameworks described above. The threshold for the maximum incremental cancer risk level is 10 parts in a million if best available control technology for toxics (T-BACT) is used. Cancer burden (the increase in number of cancer cases in the population) shall not exceed 5 parts in a million. The chronic hazard index and the acute hazard index are set at 1 part in a million.

COMMENT NO. E10-30

The VOCs detected in vapor samples collected from the Property may be compared to the CHHSLs (if any) listed at the bottom of Table 1. Of the samples collected at 5 feet bgs, two contained PCE (SV2-5' and SV6-5') above its commercial/industrial CHHSL of 0.603 ug/L. The remaining concentrations of PCE and other VOCs were below their respective commercial/industrial CHHSLs, if any."

RESPONSE NO. E10-30

Your comment regarding the analysis of VOC levels on the proposed project site has been noted. The approach to the evaluation of the vapor intrusion pathway was discussed in Section 5.5 of the HHSE

[29] http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf?sfvrsn=2 Accessed 25 August 2015.

(Kleinfelder 2014) and the comparison of the maximum soil vapor concentrations of all VOCs detected at least once in any soil vapor sample was presented in Tables 6 and 7 of the HHSE. No VOC was present at a concentration that exceeded soil vapor screening levels based on the EPA indoor air RSLs. Based on this finding, further investigation or mitigation is not warranted. See also Response to Comment No. E10-26.

COMMENT NO. E10-31

First, explain PCE once more. One of the documents calls Tetrachloroethene "PCE", even though it seems like PCE would have penta or a per (rather than tetra) beginning the chemical name. But then I notice in the June 2013 SCS document that says PCE is actually "perchloroethene." Please alleviate any confusion regarding this alphabet soup matter.

RESPONSE NO. E10-31

Your comment regarding a further explanation of PCE has been noted. Tetrachoroethene is another name for perchloroethylene (PCE). Tetrachloroethylene is widely used for dry-cleaning fabrics and metal degreasing operations.[30]

COMMENT NO. E10-32

It sounds like the CHHSLs is a basic reference which cannot be relied upon to properly assess health risks (whether it be for residential, construction, or industrial / commercial property). Would not the "precautionary principle" dictate that there needs to be a "real" health assessment with a firmer testing and remediation regimen, rather than some toothless general references? Are sweatshop workers, truckers, and construction workers expendable, or can they handle a higher toxic load? Explain thoroughly in the EIR.

RESPONSE NO. E10-32

Your comment regarding the reliability of CHHSLs for determining health risk has been noted. CHHSLs were not used in the HHSE because DTSC policy now calls for use of EPA RSLs (see DTSC HHRA Note 3 available on-line at www.dtsc.ca.gov/assessingrisk/humanrisk2.cfm). Thresholds for risk management decisions that were applied in the HHSE (Kleinfelder 2014) were consistent with Cal/EPA and federal EPA policy: cancer risk of 10^{-6} (one in one million) and a noncancer hazard quotient of 1.0.

COMMENT NO. E10-33

It is vital to point out (as it was in the last paragraph under "6 SUMMARY AND FINDINGS") that **"there has been no regulatory involvement or oversight of the investigations to date."** Later in that paragraph from a SCS report, it says that "There is a **possibility that regulatory agencies**, upon review of this report, **would require further investigation to confirm findings of this investigation and the vertical extent of VOCs in the soil.** In addition, if the Property is to be developed for residential use, additional investigation or a health risk assessment may be warranted."

[30] U.S. Environmental Protection Agency. December 2012. Available online at: http://www.epa.gov/ttnatw01/hlthef/tet-ethy.html. Accessed 24 August 2015.

RESPONSE NO. E10-33

The Department of Toxic Substances Control (DTSC) has reviewed the site characterization and health risk assessment for the site and has concluded that the site is suitable for Industrial/Commercial use, and that future development or rezoning of the property for other than Industrial/Commercial use will require additional analysis and risk evaluation by DTSC to determine the suitability of the site for such use (included as Appendix N to the Final EIR).[31]

COMMENT NO. E10-34

If a formal "health risk assessment" was undertaken, would that follow certain guidelines set forth by certain agencies? It also appears that one of the further investigations (and related sampling) needed pertain to the need for sampling at varying depths in order to gauge the vertical extent of VOCs in the soil.

RESPONSE NO. E10-34

See Response to Comment No. E10-20.

Your comment regarding the completion of the HRA and HHSE and their adherence to established agency guidelines has been noted. Thresholds for risk management decisions that were applied in the HHSE (Kleinfelder 2014) were consistent with Cal/EPA and federal EPA policy: cancer risk of 10^{-6} (one in one million) and a noncancer hazard quotient of 1.0. As discussed in the soil vapor report prepared in 2011 by SCS Engineers, a comprehensive, property-wide soil vapor assessment was performed to address the presence of volatile organic compounds based on historical site uses and as reported in environmental site investigations. SCS (2011) concluded that, based on a comparison to the now vacated California Human Health Screening Levels (CHHSLs), there was no evidence of a significant release or vapor intrusion risk. In the HHSE (see Section 5.5 and Tables 6 and7) (Kleinfelder 2014), and consistent with current DTSC policy, the SCS (2011) soil vapor data was re-evaluated using EPA Regional Screening Levels (RSLs) and the conclusions of the SCS report were corroborated i.e., the potential health hazards that may be associated with the vapor intrusion pathway under commercial land use assumptions were below a level that requires further investigation or mitigation.

COMMENT NO. E10-35

I want to point out some "Data Gaps" which were admitted on pages v and vi of the SCS Engineers' June 2013 Phase I Environmental Assessment. Gaps are admitted in "individual parcel histories", and it is admitted that: **"In light of the industrial usage of much of the Property, this is a potentially significant data gap."** It is furthermore pointed out that much of the industrial activity on this site existed when there was little or no regulatory oversight of toxic materials. "Consequently, **there are no records of hazardous material use or management. This is a potentially significant data gap."**

RESPONSE NO. E10-35

Your comment regarding the three potentially significant data gaps identified in the Phase I ESA has been noted. The Phase I ESA (Appendix VII of the Draft EIR) disclosed the potentially significant data gaps in its Executive Summary (pp. v–vi) and text (pp. 21–22).

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[31] Department of Toxic Substances Control. 22 December 2015. Letter from Brownfields and Environmental Restoration Program—Chatsworth Office, Haissam Y. Salloum, Senior Engineer, to City of Los Angeles, Department of City Planning, William Lamborn.

The Phase I ESA was performed in conformance with Title 40, Section 312 of the Code of Federal Regulations (40 CFR § 312), Standards for Conducting All Appropriate Inquiries. 40 CFR § 312.20(g) provides in relevant part that to the extent there are data gaps in the information that affect the ability of the environmental professional conducting the all appropriate inquiries to identify conditions indicative of releases or threatened releases in each area of inquiry under each standard and practice, such persons should identify such data gaps, identify the sources of information consulted to address such data gaps, and comment upon the significance of such data gaps with regard to the ability to identify conditions indicative of releases or threatened releases of hazardous substances on, at, in, or to the subject property. Sampling and analysis may be conducted to develop information to address data gaps. 40 CFR § 312.10(b) defines a data gap as a lack of or inability to obtain information required by applicable standards and practices despite good faith efforts by the environmental professional to gather such information.

Despite the potentially significant data gaps identified in the Executive Summary of the Phase I ESA, sampling and analysis were conducted in connection with the preparation of the Phase I ESA. At least five soil investigations have been conducted on the site. While no significant contamination (with respect to commercial land use) has been detected, low concentrations of VOCs were identified in scattered soil samples. The results of the soil vapor survey appeared consistent with the results of previous soil investigations, that is, trace concentrations of VOCs were detected, primarily in the northwestern portion of the site. The soil vapor data from two sampling points indicated slightly increasing VOC concentrations with depth, but the VOC vapor concentrations were, for the most part, less than generally accepted regulatory limits (CHHSLs) for commercial/industrial land use. Based on experience with similar sites, there was no evidence of a significant release or significant vapor intrusion risk based on a continued use of the site for commercial or industrial purposes. There had been no regulatory involvement or oversight of the investigations as of the date of preparation of the Phase I ESA. However, the DTSC has reviewed the site characterization and health risk assessment for the site and has concluded that the site is suitable for Industrial/Commercial use, and that future development or rezoning of the property for other than Industrial/Commercial use would require additional analysis and risk evaluation by DTSC to determine the suitability of the site for such use (included as Appendix N to the Final EIR).

Response to Comment No. E10-19 further addresses potential contamination of the project site, including the Phase I ESA and subsequent HHSE.

COMMENT NO. E10-36

Since there are admitted data gaps and uncertainties regarding extent of contamination, let us choose the side of caution and do thorough sampling for the substances which I have already mentioned in this scoping comment. The **Alameda / Central neighborhood is already essentially a "sacrifice area".** -- note that there is no admission in the record that there are actual residents in the neighborhood (either the quite immediate area to the south of 41st St. and east of Long Beach Ave.), but even no admission that residents exist in the quite populated area west of Long Beach Ave.

RESPONSE NO. E10-36

Your comment regarding the three potentially significant data gaps identified in the Phase I ESA has been noted. The Phase I ESA (Appendix VII of the Draft EIR) disclosed the potentially significant data gaps in its Executive Summary (pp. v–vi) and text (pp. 21–22).

The Phase I ESA was performed in conformance with Title 40, Section 312 of the Code of Federal Regulations (40 CFR § 312), Standards for Conducting All Appropriate Inquiries. 40 CFR § 312.20(g)

provides in relevant part that to the extent there are data gaps in the information that affect the ability of the environmental professional conducting the all appropriate inquiries to identify conditions indicative of releases or threatened releases in each area of inquiry under each standard and practice, such persons should identify such data gaps, identify the sources of information consulted to address such data gaps, and comment upon the significance of such data gaps with regard to the ability to identify conditions indicative of releases or threatened releases of hazardous substances on, at, in, or to the subject property. Sampling and analysis may be conducted to develop information to address data gaps. 40 CFR § 312.10(b) defines a data gap as a lack of or inability to obtain information required by applicable standards and practices despite good faith efforts by the environmental professional to gather such information.

Despite the potentially significant data gaps identified in the Executive Summary of the Phase I ESA, sampling and analysis were conducted in connection with the preparation of the Phase I ESA. At least five soil investigations have been conducted on the site. While no significant contamination (with respect to commercial land use) has been detected, low concentrations of VOCs were identified in scattered soil samples. The results of the soil vapor survey appeared consistent with the results of previous soil investigations, that is, trace concentrations of VOCs were detected, primarily in the northwestern portion of the site. The soil vapor data from two sampling points indicated slightly increasing VOC concentrations with depth, but the VOC vapor concentrations were, for the most part, less than generally accepted regulatory limits (CHHSLs) for commercial/industrial land use. Based on experience with similar sites, there was no evidence of a significant release or significant vapor intrusion risk based on a continued use of the site for commercial or industrial purposes. There had been no regulatory involvement or oversight of the investigations as of the date of preparation of the Phase I ESA. However, the DTSC has reviewed the site characterization and health risk assessment for the site and has concluded that the site is suitable for Industrial/Commercial use, and that future development or rezoning of the property for other than Industrial/Commercial use would require additional analysis and risk evaluation by DTSC to determine the suitability of the site for such use (included as Appendix N to the Final EIR).

Response to Comment No. E10-19 further addresses potential contamination of the project site, including the Phase I ESA and subsequent HHSE.

COMMENT NO. E10-37

As an indication **that the Alameda / Central neighborhood is essentially a "sacrifice area"**, I note that there are **11 hazardous waste sites** (called US EPAHazardous Waste Generators) **within a quarter mile of the 41st and Alameda site** (see page 18 of SCS June 2013 report). This shows that the neighborhood is already overburdened with toxic materials and industry -- **this must be part of a thorough Environmental Justice analysis on the proposed project.**

RESPONSE NO. E10-37

Your comment regarding the presence of hazardous waste sites, and the need for a thorough environmental analysis on the project has been noted.

Potential hazards and hazardous materials were evaluated via a Phase I Environmental Site Assessment (ESA) prepared by SCS Engineers in June 2013 (Appendix VII in Volume V of the DEIR), a Human Health Screening Evaluation (HHSE) prepared by Kleinfelder, Inc. (Appendix VIII in Volume VI of the DEIR), an environmental regulatory database compilation, and a review of published and unpublished literature.

Several Phase I and Phase II environmental site investigations have been performed on the subject site

since the 1990s. Reports of these investigations were reviewed to develop a conceptual site model, to identify Constituents of Potential Concern (COPCs), and to identify appropriate exposure point concentration estimates for the health screening evaluation. The reports reviewed are documented in Response to Comment No. E10-19. Collectively, these reports provide a representative summary of environmental conditions on the subject site analyzed for COPC on past land uses, breadth of chemical analyses, and quality of analytical data collected on environmental samples from the site.

An HHSE was performed for the proposed project site bounded by Martin Luther King, Jr. Boulevard, Alameda Street, East 41st Street, and Long Beach Avenue in Los Angeles, California. The HHSE was performed to evaluate whether Chemicals of Potential Concern (COPCs) were present in environmental media (soil, soil vapor, or groundwater) at concentrations that may be associated with adverse health effects under future commercial land uses.

The site was found to be suitable for commercial/industrial development based on the conceptual site model described in the HHSE (Kleinfelder 2014), which identified sub-surface utility workers and on-site employees as appropriate human receptor groups, and as presented in a comparison of the maximum concentration of any analyte detected at least once in soil or soil vapor to levels of regulatory concern. The HHSE methods, approach, and findings are discussed in more detail in Response to Comment No. E10-19. The HHSE can be found in Volume VI, Appendix VIII of the DEIR.

Related to your comment calling for a thorough environmental justice analysis, CEQA centers on whether a project may have a significant effect on the physical environment (CEQA Guidelines, 15064(d)). The purpose of an environmental impact report is to identify the significant effects on the environment of a project, to identify alternatives to the project, and to indicate the manner in which those significant effects can be mitigated or avoided (Pub. Res. Code, §21002.1 subd. (a)). Environmental justice is not considered an area of impact under CEQA, and CEQA does not ask that a project mitigate preexisting conditions. As noted in CEQA Guidelines Section 15064(b), the significance of an activity may vary with the environmental setting. Where there already is a high pollution burden on a community, the relevant question is whether an additional amount of pollution should be considered significant in light of the serious nature of the existing problem.[32]

The Existing Conditions section in Section IV.B *Air Quality* of the Draft EIR includes ambient air quality data gathered from the local air quality monitoring stations. The average concentrations and days above the standard for each criteria air pollutant are listed in Table IV.B-6 *Summary of 2010-2012 Ambient Air Quality Data in the Proposed Project Vicinity* on page IV.B-11 of the Draft EIR. The Air Quality impact analysis relative to the impacts of the proposed project has been further detailed above in Response to Comment No. E10-18 and in Section IV.B *Air Quality* of the Draft EIR. In the Draft EIR, sensitive receptors are defined on page IV.B-11. There are two maps showing their locations: Figure IV.B-1 *Sensitive Receptors* and Figure IV. B-2 *Receptor Grid and Sensitive Receptors*.

COMMENT NO. E10-38

The CUMULATIVE IMPACT of all the historic hazardous materials activities on the 41st and Alameda site, continued exposure to such materials on-site, combined with excessive air pollutants from industry in the region (including the nearby hazardous waste generators as well as the Exide battery facility in Vernon), combined with pollutants from nearby freeways and streets as well as from LAX-related air traffic (including the associated "fine particulates") combined with likely

[32] Harris, Kamala D. 10 July 2012. *Environmental Justice at the Local and Regional Level: Legal Background*. Prepared by State of California Department of Justice. Available at: http://oag.ca.gov/sites/all/files/agweb/pdfs/environment/ej_fact_sheet.pdf

emissions from the project (in construction and operational phases) all need to be carefully evaluated.

RESPONSE NO. E10-38

Your comment regarding cumulative hazardous waste and air quality risks has been noted. The potential risks from on-site contamination have been discussed in Response to Comment No. E10-19. A Phase I ESA was prepared by SCS Engineers in June 2013 (Appendix VII in Volume V of the Draft EIR), and a Human Health Screening Evaluation (HHSE) was prepared by Kleinfelder, Inc. (Appendix VIII in Volume VI of the Draft EIR) in accordance with California Environmental Protection Agency (Cal/EPA) guidance as described in the Preliminary Endangerment Assessment (PEA) Guidance Manual.

The Phase I ESA revealed evidence of conditions indicative of releases or threatened releases of hazardous substances. The Property has a long and varied history of residential and commercial/industrial uses. Many of the identified commercial/industrial uses are of types typically associated with the use or storage of hazardous materials. Consequently, these activities pose a risk of contamination on the Property. At least five soil investigations have been conducted on the Property. While no significant contamination (with respect to commercial land use) has been detected, low concentrations of VOCs were identified in scattered soil samples. The results of the soil vapor survey appeared consistent with the results of previous soil investigations, that is, trace concentrations of VOCs were detected, primarily in the northwestern portion of the Property. The VOC vapor concentrations were, for the most part, less than generally accepted regulatory limits (CHHSLs) for commercial/industrial land use. Based on experience with similar sites, there was no evidence of a significant release or significant vapor intrusion risk based on a continued use of the Property for commercial or industrial purposes. The soil vapor data from two sampling points indicated slightly increasing VOC concentrations with depth. The Department of Toxic Substances Control (DTSC) has reviewed the site characterization and health risk assessment for the site and has concluded that the site is suitable for Industrial/Commercial use, and that future development or rezoning of the property for other than Industrial/Commercial use will require additional analysis and risk evaluation by DTSC to determine the suitability of the site for such use (included as Appendix N to the Final EIR).[33]

With regard to cumulative air quality impacts, SCAQMD's *CEQA Air Quality Handbook* identifies several methods to determine the cumulative significance of land use projects (i.e., whether the contribution of a project is cumulatively considerable). However, the SCAQMD no longer recommends the use of these methodologies. Instead, according to SCAQMD's *White Paper on Regulatory Options for Addressing Cumulative Impacts from Air Pollution Emissions*, the new recommendation says if any emissions from individual development projects exceed the project-specific mass daily emissions thresholds, then they must also be considered cumulatively considerable. SCAQMD neither recommends quantified analyses of the emissions generated by a set of cumulative development projects nor provides thresholds of significance to be used to assess the impacts associated with these emissions.

The proposed project would have a significant impact on air quality for PM_{10} emissions during construction. Due to the anticipated air quality impacts during the construction phase, the CalEEMod was re-run including Mitigation Measures Air-1 through Air-7, as detailed on page IV.B-23-24 of the Draft EIR. The CalEEMod model is calibrated to calculate the anticipated reductions in criteria pollutants associated with each mitigation measure. The analysis of the mitigated impacts of the construction phase of the project is provided in Table IV.B-12 of the Draft EIR (page IV.B-24), The implementation of these

[33] Department of Toxic Substances Control. 22 December 2015. Letter from Brownfields and Environmental Restoration Program—Chatsworth Office, Haissam Y. Salloum, Senior Engineer, to City of Los Angeles, Department of City Planning, William Lamborn.

mitigation measures would result in the reduction of both construction $PM_{2.5}$ and PM_{10} emissions by approximately 63 percent and 73 percent, respectively, reducing PM_{10} emissions to below the level of SCAQMD significance threshold.

These mitigations targeted at PM emissions include Mitigation Measures Air-1, Air-2, and Air-3 listed below:

Air-1. During the construction phase of the project, the project applicant shall apply soil stabilizers for all unpaved roads (80 percent reduction in $PM_{2.5}$ and PM_{10} emissions).

Air-2. During the construction phase of the project, the project applicant shall water exposed areas three times a day (61 percent reduction in $PM_{2.5}$ and PM_{10} emissions).

Air-3. During the construction phase of the project, the project applicant shall ensure that vehicular speeds are reduced to 15 miles per hour on unpaved roads.

All other criteria pollutants are anticipated to be below the SCAQMD significance thresholds as shown in Table IV.B-8 *Unmitigated Estimated Daily Regional Construction Emissions* and Table IV.B-9 *Unmitigated Estimated Daily Operational Emissions*. The cancer risk from diesel particulate matter (DPM) was analyzed separately in the air quality analysis through the Health Risk Assessment (HRA), located in Appendix V in Volume IV of the Draft EIR. The major source of DPM for this proposed project is mobile trips made by delivery trucks to and from the proposed site. The HRA relied upon data from the Traffic Impact Study and its October 2014 Addendum in calculating DPM emissions.

Construction related toxic air contaminants (TACs) from diesel particulate emissions will be short-lived (3 months), and therefore do not require a Health Risk Assessment (HRA) from the Office of Environmental Health Hazard Assessment (OEHHA). Diesel particulate emissions only affect the population on a long -term basis (70-year) for cancer impacts, so the impact of short-term TACs from the construction of the proposed project was determined to be less than significant and were not quantified as part of the Draft EIR. The construction phase air quality impact analysis can be found in the Impact Analysis portion of Section IV.B *Air Quality* of the Draft EIR (pg. IV.B-17-18).

For the operations of the proposed project, the Draft EIR considered a total of 351 truck trips/day. Of the 351, EMFAC 2011, an emissions factor model, estimates that on average 9 percent of the total trucks are diesel fueled trucks, for an estimate of 31 diesel fueled trucks. Because the total trucks trips per day are greater than 100, a refined Health Risk Assessment for operational impacts was conducted that identified sensitive receptors and individual cancer risk. The maximum potential cancer risk is 0.3 in a million. This is only 3 percent of the cancer risk threshold of 10 in a million as set by SCAQMD Rule 1401. Therefore, the proposed project would not result in significant human health risks related to diesel emissions. With Alternative C, Reduced Truck Operations, truck trips would be limited to 75 truck trips per day. As a result, under Alternative C the maximum cancer risks drop to 0.6 percent of the allowable threshold.

COMMENT NO. E10-39

By the way, **what model will be used to predict emissions from construction activities on the 41st and Alameda site? How will NOX and "black carbon" be regulated as far as construction emissions at the site?** Also, **identify the VOC content of paint** which may be used at this site. In regards to traffic, **we need more detail on what trip generation assumptions are used to generate operational emissions from the project. As far as facility operation, will there be regulations pertaining to idling time for diesel trucks, or will cleaner trucks be considered since this area is already overburdened with toxic materials?** Apparently, mere sweatshop workers, groundskeepers, and truck-drivers do not

deserve a level of remediation of the site that one would expect (and which may be legally mandated) if a residence or residences were planned on the property.

RESPONSE NO. E10-39

Your comment regarding the air quality model, the regulation of NO_x and black carbon, the VOC content of paint that will be used on-site, operational truck idling time, and clean truck technologies has been noted.

- The CalEEMod.2013.2.2 will be used to model construction and operation emissions from the proposed project site.
- NO_x is included as one of the main criteria air pollutants to be measured in the model and compared against the SCAQMD significance threshold. The SCAQMD air quality significance threshold for NO_x is 100 pounds/day for construction and 55 pounds/day for operation.
- Black carbon is not a criteria air pollutant according to CARB and is not measured specifically in the air analysis for the proposed project. There is no standard or threshold established for black carbon. The impacts of black carbon are considered cumulatively in the analysis of $PM_{2.5}$ and PM_{10}.
- Paint with low VOC content (nonresidential interior VOC = 250 g/L) will be used.
- CARB mandates that airborne toxic control measures (ATCMs) limit diesel fueled commercial vehicles (delivery trucks) to idle for no more than 5 minutes at any given time.

SCAG's 2012-2035 RTP/SCS sets a regional commitment to deploying zero- and near-zero emission transportation technologies in the 2023-2035 time frame, but there are no specific requirements for the trucks and passenger vehicles associated with the proposed project to use these zero emission technologies. The relevant existing regulation from CARB includes the ATCMs to limiting truck idling to 5 minutes. Alternative B, Use of Clean Fuel Trucks, evaluates the impacts from using alternative fueled trucks versus diesel trucks in the proposed project.

The proposed project anticipates a total of 351 truck trips/day. The project was assumed as a single warehousing project with ancillary office uses (i.e., office spaces are related to warehousing uses and no outside office use) for trip generation purposes. ITE trip generation model was used to estimate trips to be generated by the project using trip generation rates based on nation-wide survey of similar warehouses. This resulted in a total of 351 truck trips to be generated by the project. However, under Alternative C, no more than 75 truck trips per day are expected to be generated by the project. The analysis based on these truck trips results in no significant project traffic impacts on the study area circulation system.

The following items were highlighted in the Air Quality Health Risk Assessment (Appendix V in Volume IV of the Draft EIR) dated September 17, 2014 (referred to here as the HRA):

a. The Addendum to the Traffic Impact Study (Appendix IX; October 3, 2014) shows that at 351 truck trips per day, impacts will occur only at the Alameda/Washington intersection, and not at intersections surrounding the project site. However, Alternative C analysis assumptions (75 maximum truck trips per day) will not have any significant impact at any study intersections. See Draft EIR Page IV.G-13 for discussion on this topic.

b. The project applicant has specified that truck traffic will consist of cargo vans and box trucks only; no large diesel semi-tractor trucks are included in the daily traffic to the site, thus further reducing potentially harmful emissions.

c. The HRA assumed 351 trucks per day based on the proposed project based upon ITE (Institute of Transportation Engineers) trip generation rates.

d. Per the approved EMFAC 2011 emissions model, the size vehicles anticipated could be either diesel or gasoline powered. EMFAC distributions specific to Los Angeles County show that 9 percent of these vehicles on average (i.e., 31 trucks per day) are expected to be diesel powered.

e. Per the HRA and assuming 351 truck trips per day, the maximum cancer risk is estimated to be only 3 percent of the allowable threshold of 10 in 1 million.

f. With Alternative C, Reduced Truck Operations, truck trips would be limited to 75 truck trips per day. As a result, the maximum cancer risks drop to 0.6 percent of the allowable threshold.

g. Alternative B, Use of Clean Fuel Trucks, would reduce DPM and air quality impacts overall by using alternative fuels rather than diesel to fuel the trucks.

COMMENT NO. E10-40

Lastly, I will mention that more things should have been checked on the checklist as applicable to this project -- though I mentioned it in earlier comments which will be scanned and sent in, so I will leave it be for now.

RESPONSE NO. E10-40

Your comment has been noted.

COMMENT NO. E10-41

Keep me updated on any public scoping hearing, and in regards to all other aspects of the proposed development on the 41st and Alameda site -- now increasingly called the 4051 South Alameda Street Project.

RESPONSE NO. E10-41

Your comment has been noted. Your name and contact information has been included on the project distribution list and you will be informed of future opportunities for comment. However, as mentioned in Response to Comment Nos. E10-4 and E10-5, a public scoping meeting was not held as the project does not meet the criteria for regional significance.

LETTER NO. E11

Bruce Campbell – Letter No. 2

COMMENT NO. E11-1

This is my third submission of comments regarding the DEIR on the 4051 South Alameda Street proposal.

Thank you for including them in the file.

The following were key paragraphs in my comment letter (sent on July 9, 2014) on the NOP – which I wanted to especially highlight due there being a desperate need for responses to the issues.

RESPONSE NO. E11-1

This comment provides introductory transmittal comments and does not directly address the contents of the Draft EIR. Comments on the project and Draft EIR follow with responses.

COMMENT NO. E11-2

These include a whole bunch of toxic materials which should be tested for at the old South Central Farm site, as well as in regards to needing an Environmental Justice analysis seeing that the Alameda / Central neighborhood is often considered a "sacrifice zone." Plus, we need analyses of "black carbon", more discussion on what trucks are allowed and their turning radius, etc.

RESPONSE NO. E11-2

Black carbon is not a criteria air pollutant according to CARB and is not measured specifically in the air quality analysis for the proposed project. There is no standard or threshold established for black carbon. The impacts of black carbon are considered in the analysis of $PM_{2.5}$ and PM_{10} because black carbon is a component of diesel particulate matter emissions, which are quantified in Table IV.B-8 and Table IV.B-9 in Section IV.B *Air Quality* of the Draft EIR.

CEQA centers on whether a project may have a significant effect on the physical environment (CEQA Guidelines, 15064(d)). The purpose of an environmental impact report is to identify the significant effects on the environment of a project, to identify alternatives to the project, and to indicate the manner in which those significant effects can be mitigated or avoided (Pub. Res. Code, §21002.1 subd. (a)). Environmental justice is not considered an area of impact under CEQA, and CEQA does not ask that a project mitigate preexisting conditions. As noted in CEQA Guidelines Section 15064(b), the significance of an activity may vary with the environmental setting. Where there already is a high pollution burden on a community, the relevant question is whether an additional amount of pollution should be considered significant in light of the serious nature of the existing problem.[34]

There are 11 projects that are anticipated to be implemented within the construction period of the proposed project occurring within an approximate 2-mile radius of the proposed project site and are therefore included in the cumulative impact analysis of the proposed project (Table II.B-1, *List of Related*

[34] Harris, Kamala D. 10 July 2012. *Environmental Justice at the Local and Regional Level: Legal Background*. Prepared by State of California Department of Justice. Available at: http://oag.ca.gov/sites/all/files/agweb/pdfs/environment/ej_fact_sheet.pdf

Projects, Figure II.B-1, *Related Projects*). According to the South Coast Air Quality Management District (SCAQMD), individual construction projects that exceed the SCAQMD recommended daily thresholds for project-specific impacts would cause a cumulatively considerable increase in emissions for those pollutants for which the basin is a nonattainment area. As discussed above, emissions during construction of the proposed project as analyzed in the Draft EIR would be reduced to below the level of significance with the implementation of Mitigation Measures Air-1 through Air-7. Therefore, implementation of the proposed project would not be expected to result in cumulative impacts when considered with construction of the related past, present, or reasonably foreseeable projects.

An evaluation of the cumulative impacts to air quality/pollution has been disclosed in Section IV.B, *Air Quality*, pages IV.B-22 and IV.B-23, of the Draft EIR. The Existing Conditions section in Section IV.B *Air Quality* of the Draft EIR includes ambient air quality data gathered from the local air quality monitoring stations. The average concentrations and days above the standard for each criteria air pollutant are listed in Table IV.B-6 *Summary of 2010-2012 Ambient Air Quality Data in the Proposed Project Vicinity* on page IV.B-11 of the Draft EIR. The Air Quality impact analysis relative to the impacts of the proposed project has been further detailed in Section IV.B *Air Quality* of the Draft EIR and in Response to Comment No. E10-38 above. In the Draft EIR, sensitive receptors are defined on page IV.B-11. There are two maps showing their locations: Figure IV.B-1 *Sensitive Receptors* and Figure IV. B-2 *Receptor Grid and Sensitive Receptors*.

The project applicant has specified that truck traffic will consist of cargo vans and box trucks only; no large diesel semi-tractor trucks are included in the daily traffic to the site. The turning radius will be standard to cargo vans and box trucks. The proposed project would nevertheless accommodate 65-foot-long tractor trailers should such larger trucks ever be required to access the project site. Please see the revised Figure IV.G-1, *Access Driveways*, in Section IV, *Corrections and Additions to the Draft EIR*, for a diagram for maneuvering a 65-foot-long tractor trailer on-site.

COMMENT NO. E11-3

Also, it is sure bogus to act like measurements four miles to the north accounts for what is in Alameda Corridor area air, and yet cut off consideration of "SENSITIVE RECEPTORS" at a mere 500 feet from the 4051 South Alameda site – so I will recopy what I advised as far as analyzing how sensitive receptors at recreation, school, and other sites not far away from the site will be impacted.

RESPONSE NO. E11-3

Your comment regarding sensitive receptors has been noted. There are 64 identified sensitive receptors within a 500-foot radius of the proposed project site. See Section IV.B, *Air Quality*, specifically Figure IV.B-1, *Sensitive Receptors*, in the Draft EIR. Other sensitive receptors such as schools and medical facilities are outside the 500 foot radius, but can be seen in Figure IV.B-2, *Receptor Grid and Sensitive Receptors*, in the Draft EIR. The sensitive receptors include multifamily residences located to the west, southwest, and south of the proposed project site. In addition, a human health risk analysis was performed in relation to specific sensitive receptors. This analysis identified the point of maximum impact to all receptors, residential receptors, sensitive receptors, and receptors of interest. Table IV.B-11 contains a summary of the health impact results from diesel particulate matter on these key sensitive receptors. Further information on the exposure of sensitive receptors to air pollution can be found on pages IV.B17-23 of the Draft EIR, including cumulative impacts.

The City acknowledges that the comment states "measurements 4 miles to the north" as being inadequate. On page IV.B-10 of the Draft EIR, it states, "The closest monitoring station to the proposed project is the Los Angeles-North Main Street Monitoring Station, located approximately 4 miles north of the proposed

project at 1630 North Main Street, Los Angeles, California 90012. The Los Angeles-North Main Street Monitoring Station records measurements for ozone, carbon monoxide, nitrogen dioxide, $PM_{2.5}$, PM_{10}, and sulfur dioxide." This is the closest local ambient air data available. The 500 foot radius chosen to evaluate sensitive receptors by a distribution center is established by California Air Resources Board's (CARB's) Air Quality and Land Use Handbook.

COMMENT NO. E11-4

The DEIR inadequately analyzes "sensitive receptors" and virtually ignores the key analyses needed in regards to ENVIRONMENTAL JUSTICE / SACRIFICE ZONES, BLACK CARBON EMISSIONS, CUMULATIVE IMPACTS to Sensitive Receptors, to workers, and to others in the neighborhood or along the Alameda Corridor. Here are some excerpts from my comment letter submission sent on July 9, 2014:

Also, I realize that not only was there a concerted effort made to pretend that there are no residences south of 41st St. and east of Long Beach Ave., but **they even have the nerve to pretend that the fairly densely populated neighborhood to the west of Long Beach Ave. is mere warehouse / industrial.** Basically, after going about a block west of Long Beach Ave. on 41st Ave., then it is predominately a residential area, and quite a populated one at that. **Thus, do not pretend there are not a bunch of "sensitive receptors" in the immediate as well as greater vicinity of the 41st and Alameda site.**

I will now peer at the map in the record and mention some key parcels in the general area which could be considered "sensitive receptors" or otherwise contributing to safety concerns in the region. **Glancing at page 27 of 781, the Snyder Recreation Center would be the closest site which would have a number of sensitive receptor people (unless one counts individuals with asthma, other ailments, or a baby or elder in closerby residences) I note that the nearest school is Nevin Ave. School -- followed closely by Jefferson High School, then the Roberts Recreation Center, the Ascot Avenue School, and the Holmes Ave. School. Carefully evaluate the likely impacts of added air pollutants on the sensitive receptors at each school and recreation site mentioned above.**

Increased diesel emissions, increased congestion, inadequate street size, and other aspects relating to the project will certainly add to the already excessive toxic burden which the Alameda - Central community carries at the aforementioned schools and recreation centers, as well as otherwise. While I personally have not surveyed the neighborhood for nursing / retirement homes, or for places for medical or psychiatric care, please identify such facilities in the EIR if they are within 3/4 of a mile of the 41st and Alameda site.

With the increased congestion on all 4 surrounding streets, as well as the proposed surge in vehicle journeys associated with the project, **this increase in emissions which clearly has an impact on many sensitive receptors must be carefully analyzed in the EIR.** In addition, **these emissions, plus the impact on health and safety of sensitive receptors** in the neighborhood, must also be carefully analyzed in **an Environmental Justice context.**

RESPONSE NO. E11-4

Please note that this is the exact same comment from Letter No. E10, Bruce Campbell - Letter No. 1, Comment Nos. E10-15, E10-16, E10-17, and E10-18, from the NOP comment period. See Response to Comment Nos. E10-15, E10-16, E10-17, and E10-18 above under Letter No. E10.

COMMENT NO. E11-5

IMPORTANT SUBSTANCES FOR WHICH TO TEST:

I find 14 samples at 5 foot depth, with perhaps two at a 15-foot depth as part of a soil vapor probe, to be an inadequate characterization of this heavily abused site for toxic materials.

I call for a thorough assessment of hazards and hazardous materials to be included in the EIR. **Such thorough testing would involve numerous sampling sites within each acre within the 41st and Alameda site.** A mere one sample per acre is certainly inadequate if one is concerned about health and safety. I am not an expert on sampling, but the more the better, and taking samples at differing depths could bring useful information forward.

The toxic materials which must be tested for (in the EIR) include: Total Petroleum Hydrocarbons (TPH), VOCs, SVOCs, CCR Title 22 metals, organochlorine pesticides, PCBs, pentachlorophenol, creosote, formaldehyde, xylene, benzene, toluene, 2,4-D , DDT / DDE, glyphosate, atrazine, ARSENIC, lead, fluoride, HEXAVALENT CHROMIUM, cadmium, chromium, chromium-6, chromium-12, perchlorate, TCE, Tetrachloroethene, PCE, diesel constituents and breakdown products, as well as for substances one might find from a color and dye company and from a dry-cleaning company once on the site.

In addition, test for these components and/or breakdown products of diesel. I note that **Table 1: Substances in Diesel Exhaust Listed by Cal EPA as Toxic Air Contaminants mentions these:** acetaldehyde; acrolein; aniline; antimony compounds; arsenic; benzene; beryllium compounds; biphenyl; bis[2-ehtylhexyl)phthalate; 1,3-butadiene; cadmium; chlorine; chlorobenzene; chromium compounds; cobalt compounds; creosol isomers; cyanide compounds; dibutylphthalate; dioxins and dibenzofurans; ethyl benzene; formaldehyde; inorganic lead; manganese compounds; mercury compounds; methanol; mehtyl ethyl ketone; naphthalene; nickel; 4-nitrobiphenyl; phenol; phosphorus; polycyclic organic matter, including polycyclic aromatic hydrocarbons (PAHs) and their derivatives; propionaldehyde; selenium compounds; styrene; toluene; xylene isomers and mixtures; o-sylenes; m-xylenes; and p-xylenes. Please test for some of these components of diesel emissions in soil at various sites throughout the approximately 14 acres.

Some review of the earlier documentation indicated that certain substances were found at levels of concern.

RESPONSE NO. E11-5

Please note that this is the exact same comment from Letter No. E10, Bruce Campbell - Letter No. 1, Comment Nos. E10-19, E10-20, E10-21, and E10-22, from the NOP comment period. See Response to Comment Nos. E10-19, E10-20, E10-21, and E10-22 above under Letter No. E10.

COMMENT NO. E11-6

Seeing that an AQMD official or staffer advised that the earlier incarnation of this proposed development be mitigated by having a ramp for traffic to travel all the way from the 41st and Alameda site up to the Santa Monica Freeway, does it sound like the AQMD considers this fairly similar development (except on even more of the site) of regional significance?

RESPONSE NO. E11-6

The comment is an exact copy of Comment No. E10-24 above under Bruce Campbell – Letter No. 1. See Response to Comment No. E10-24 above under Letter No. E-10.

COMMENT NO. E11-7

It is vital to point out (as it was in the last paragraph under "6 SUMMARY AND FINDINGS") that **"there has been no regulatory involvement or oversight of the investigations to date."** Later in that paragraph from a SCS report, it says that "There is a **possibility that regulatory agencies**, upon review of this report, **would require further investigation to confirm findings of this investigation and the vertical extent of VOCs in the soil.** In addition, if the Property is to be developed for residential use, additional investigation or a health risk assessment may be warranted."

If a formal "health risk assessment" was undertaken, would that follow certain guidelines set forth by certain agencies? It also appears that one of the further investigations (and related sampling) needed pertain to the need for sampling at varying depths in order to gauge the vertical extent of VOCs in the soil.

RESPONSE NO. E11-7

The comment is an exact copy of Comment Nos. E10-33 and E10-34 previously addressed above under Bruce Campbell – Letter No. 1. See Response to Comment Nos. E10-33 and E10-34 above under Letter No. E10.

COMMENT NO. E11-8

I want to point out some "Data Gaps" which were admitted on pages v and vi of the SCS Engineers' June 2013 Phase I Environmental Assessment. Gaps are admitted in "individual parcel histories", and it is admitted that: **"In light of the industrial usage of much of the Property, this is a potentially significant data gap."** It is furthermore pointed out that much of the industrial activity on this site existed when there was little or no regulatory oversight of toxic materials. "Consequently, **there are no records of hazardous material use or management. This is a potentially significant data gap."**

Since there are admitted data gaps and uncertainties regarding extent of contamination, let us choose the side of caution and do thorough sampling for the substances which I have already mentioned in this scoping comment. The **Alameda / Central neighborhood is already essentially a "sacrifice area".** -- note that there is no admission in the record that there are actual residents in the neighborhood (either the quite immediate area to the south of 41st St. and east of Long Beach Ave.), but even no admission that residents exist in the quite populated area west of Long Beach Ave.

RESPONSE NO. E11-8

The comment is an exact copy of Comment Nos. E10-35 and E10-36 previously addressed above under Bruce Campbell – Letter No. 1. See Response to Comment Nos. E10-35 and E10-36 above under Letter No. E10.

COMMENT NO. E11-9

As an indication **that the Alameda / Central neighborhood is essentially a "sacrifice area"**, I note that there are **11 hazardous waste sites** (called US EPAHazardous Waste Generators) **within a quarter mile**

of the 41st and Alameda site (see page 18 of SCS June 2013 report). This shows that the neighborhood is already overburdened with toxic materials and industry -- **this must be part of a thorough Environmental Justice analysis on the proposed project.**

RESPONSE NO. E11-9

The comment is a verbatim compilation of Comment No. E10-37 previously addressed above under Bruce Campbell – Letter No. 1. See Response to Comment No. E10-37 above under Letter No. E10.

COMMENT NO. E11-10

The CUMULATIVE IMPACT of all the historic hazardous materials activities on the 41st and Alameda site, continued exposure to such materials on-site, combined with excessive air pollutants from industry in the region (including the nearby hazardous waste generators as well as the Exide battery facility in Vernon), combined with pollutants from nearby freeways and streets as well as from LAX-related air traffic (including the associated "fine particulates") combined with likely emissions from the project (in construction and operational phases) all need to be carefully evaluated.

RESPONSE NO. E11-10

The comment is a verbatim compilation of Comment No. E10-38 previously addressed above under Bruce Campbell – Letter No. 1. See Response to Comment No. E10-38 above under Letter E10.

COMMENT NO. E11-11

By the way, **what model will be used to predict emissions from construction activities on the 41st and Alameda site? How will NOX and "black carbon" be regulated as far as construction emissions at the site?** Also, **identify the VOC content of paint** which may be used at this site. In regards to traffic, **we need more detail on what trip generation assumptions are used to generate operational emissions from the project. As far as facility operation, will there be regulations pertaining to idling time for diesel trucks, or will cleaner trucks be considered since this area is already overburdened with toxic materials?**

RESPONSE NO. E11-11

The comment is a verbatim compilation of Comment No. E10-39 previously addressed above under Bruce Campbell – Letter No. 1. See Response to Comment No. E10-39 above under Letter No. E10.

COMMENT NO. E11-12

The above excerpts does not mean that you can ignore other points that I brought up in my comment letter on the NOP sent on July 9, 2014 just because they are not specifically recopied in this Submission # 3 on the DEIR on the 4051 So. Alameda St. project.

RESPONSE NO. E11-12

Your comments regarding your previous comments in your letter submitted for the Notice of Preparation have been noted. Your letter was inadvertently left out of Appendix II of the Draft EIR. However, your comments have been addressed in the body of the Draft EIR, consistent with the approach to all the comments from the scoping period. The responses to comments attached to Letter No. E10 have been

responded to above. Your letter has been added to Appendix II as part of Section IV, *Corrections and Additions to the Draft EIR*, of the Final EIR.

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LETTER NO. E12

Bruce Campbell – Letter No. 3

COMMENT NO. E12-1

This is my second submission of comments regarding the DEIR on the 4051 South Alameda Street proposal. Thank you for including them in the file.

RESPONSE NO. E12-1

This comment provides introductory transmittal comments and does not directly address the contents of the Draft EIR. Comments on the project and Draft EIR follow with responses.

COMMENT NO. E12-2

Due to the exclusion of my comment letter from the Appendixes of the DEIR regarding the 4051 South Alameda Street project, please begin the process to re-submit the DEIR with at least a 45-day comment period. In this circulation, do include my comment letter on the Notice of Preparation which was sent to Ms. Hewawitharana on July 9th, 2014 – as well as all other comment letters on the project whether they were accidentally or purposefully excluded. (I forwarded my original comment letter to Ms. Hewawitharana earlier today to prove that such a comment letter exists and was sent in a timely manner.) It would also be preferable if the letters submitted by the public and by agencies could be viewed taking up more of the screen.

It may be a metaphor for the land-use process in the City of L.A., but why should the applicant's pages of info cover the whole computer screen, while I have to squint with my computer glasses on in order to see what the public said in comments covering a small portion of the screen? Of course, it is easier to hide the fact that certain comments were excluded if the scrolling process is a laborious process and has real small print. But, I ask for my comment letter dated July 8th, 2014, and sent via e-mail on July 9th, 2014, to be included in a recirculated DEIR – preferably in a large enough size to read.

Thank you for remedying this serious violation of CEQA and begin the recirculation process soon.

Of course I am seeking additional responses in the new DEIR to respond to many concerns which I brought up, not just calling for the addition of excluded letter(s), but with the exact same wording by the applicant to be re-circulated.

RESPONSE NO. E12-2

Your comments regarding the Draft EIR comment period, your previous comment on your letter submitted for the Notice of Preparation, and the screen resolution on the City's webpage have been noted. Your letter was inadvertently left out of Appendix II of the Draft EIR. However, your comments have been addressed in the body of the Draft EIR, consistent with the approach to all the comments from the scoping period. The responses to comments attached to letter number E10 have been responded to above. Your letter will be added to Appendix II as part of Section IV, *Corrections and Additions to the Draft EIR*, of the Final EIR. Your comment regarding the screen resolution of the City's webpage has been noted.

COMMENT NO. E12-3

Some of my points (but not all) where I saw no discussion of the subject in the documents include considering the Alameda / Central neighborhood in an "Environmental Justice" analysis – and I referred to the vicinity as a "sacrifice zone". I also asked for analysis of "black carbon" toxic emissions to be analyzed both in terms of toxicity of air pollutants relating to the project's construction phase emissions (and preferably relating to Greenhouse Gases as well) – but I was unable to locate any discussion of that significant toxin in the DEIR and associated documents.

RESPONSE NO. E12-3

CEQA centers on whether a project may have a significant effect on the physical environment (CEQA Guidelines, 15064(d)). The purpose of an environmental impact report is to identify the significant effects on the environment of a project, to identify alternatives to the project, and to indicate the manner in which those significant effects can be mitigated or avoided (Pub. Res. Code, §21002.1 subd. (a)). Environmental justice is not considered an area of impact under CEQA, and CEQA does not ask that a project mitigate preexisting conditions. As noted in CEQA Guidelines Section 15064(b), the significance of an activity may vary with the environmental setting. Where there already is a high pollution burden on a community, the relevant question is whether an additional amount of pollution should be considered significant in light of the serious nature of the existing problem.[35]

The Existing Conditions section in Section IV.B *Air Quality* of the Draft EIR includes ambient air quality data gathered from the local air quality monitoring stations. The average concentrations and days above the standard for each criteria air pollutant are listed in Table IV.B-6 *Summary of 2010-2012 Ambient Air Quality Data in the Proposed Project Vicinity* on page IV.B-11 of the Draft EIR. The Air Quality impact analysis relative to the impacts of the proposed project has been further detailed in Section IV.B *Air Quality* of the Draft EIR and in Response to Comment No. E10-38 above.

Black carbon is a component of particulate matter emissions, which are covered in Section IV.B of the Draft EIR. Black carbon is not a criteria air pollutant according to the California Air Resources Board (CARB) and is not measured specifically in the air quality analysis for the proposed project. There is no standard or threshold established for black carbon. The impacts of black carbon are considered in the analysis of $PM_{2.5}$ and PM_{10} because black carbon is a component of diesel particulate matter emissions, which are quantified in Table IV.B-8 and Table IV.B-9 in Section IV.B *Air Quality* of the Draft EIR.

COMMENT NO. E12-4

I called for the document to state exactly what kind of trucks would be allowed into the 4051 South Alameda site (including specifically asking about 53- foot trailers with large sleeper cabs which are so difficult to maneuver on many urban streets), while another person who focused on truck-related comments was also unable to find his comment on the NOP.

RESPONSE NO. E12-4

Your comment inquiring about the type of trucks used in the proposed project has been noted. The applicant has specified that truck traffic would consist of cargo vans and box trucks only; no large diesel semi-tractor trucks would be included in the daily traffic to the site, thus further reducing potentially

[35] Harris, Kamala D. 10 July 2012. *Environmental Justice at the Local and Regional Level: Legal Background*. Prepared by State of California Department of Justice. Available at: http://oag.ca.gov/sites/all/files/agweb/pdfs/environment/ej_fact_sheet.pdf

harmful emissions. Additionally, please see the revised Figure IV.G-1, *Access Driveways*, (on page IV-6) of Section IV, *Corrections and Additions to the Draft EIR*, for a diagram for maneuvering a 65-foot-long tractor trailer on-site.

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LETTER NO. E13

Bruce Campbell – Letter No. 4

COMMENT NO. E13-1

I accidentally sent my Submission #4 to myself – rather than to you.

I sure hope that this is counted despite my accident of sending it to myself instead (while honing the wording). And whether this is counted or not, my other 3 Submissions do count, and thus the DEIR must be recirculated answering many of my concerns brought up in my July 9, 2014 and other comments.

RESPONSE NO. E13-1

This comment provides introductory transmittal comments and does not directly address the contents of the Draft EIR. Comments on the project and Draft EIR follow with responses.

COMMENT NO. E13-2

Please consider this my Submission # 4 regarding the DEIR on the 4051 South Alameda Street proposal. I could sure use more time to assemble my notes since I did not expect to spend a few hours today reiterating my earlier (scandalously excluded) submission on the NOP with that e-mail sent on July 9, 2014. But, that is how the ball bounced seeing that my substantial comments were conveniently excluded from the Appendix which had at least most of the comment letters on the Notice of Preparation for the 4051 So. Alameda St. project.

RESPONSE NO. E13-2

Your comment regarding your previous comments in your letter submitted for the Notice of Preparation has been noted. Your letter was inadvertently left out of Appendix II of the Draft EIR. However, your comments have been addressed in the body of the Draft EIR, consistent with the approach to all the comments from the scoping period. In addition, your NOP comments have been responded to individually as requested in Letter No. E10, above. Your letter has been added to Appendix II as part of Section IV, *Corrections and Additions to the Draft EIR*, of the Final EIR.

COMMENT NO. E13-3

I note that Sensitive Receptors seem to be more or less mapped within 500 feet of the proposed project site. Why only 500 feet? Aren't the higher concentration of sensitive receptors just beyond that 500 foot distance? Please respond to my concern about sensitive receptors at various schools, recreation centers, etc. (as was called for in my 7-9-14 e-mailed comment letter on the NOP).

RESPONSE NO. E13-3

Your comment regarding sensitive receptors has been noted. There are 64 identified sensitive receptors within a 500-foot radius of the proposed project site. See Section IV.B, *Air Quality*, specifically Figure IV.B-1, *Sensitive Receptors* and Figure IV.B-2, *Receptor Grid and Sensitive Receptors* in the Draft EIR. The 500 foot radius chosen to evaluate sensitive receptors by a distribution center is established by CARB's Air Quality and Land Use Handbook. The sensitive receptors include residences located to the west, southwest, and south of the proposed project site. Schools, recreation centers, and medical facilities are included in the CARB's definition of sensitive receptors, but they are all located outside of the 500

foot radius of the proposed project site. In addition, an Air Quality Health Risk Assessment (Appendix V in Volume IV of the Draft EIR) was performed in relation to specific sensitive receptors. This analysis identified the point of maximum impact to all receptors, residential receptors, sensitive receptors, and receptors of interest. Table IV.B-11 of the Draft EIR contains a summary of the health impact results from toxic air contaminants like diesel particulate matter on these key sensitive receptors. Air quality and health-related impacts during both construction and operational phases of the project are further discussed on pages IV.B-17 through IV.B-22 of the Draft EIR. All criteria pollutants, except PM_{10} during construction, are anticipated to be below the SCAQMD significance thresholds as shown in Table IV.B-8 *Unmitigated Estimated Daily Regional Construction Emissions* and Table IV.B-9 *Unmitigated Estimated Daily Operational Emissions*. PM_{10} emissions are expected to be reduced to below the level of significance after mitigation.

COMMENT NO. E13-4

Then I notice that 11 other construction projects in the general vicinity are examined. However, there are two key actual or potential construction projects that should also be evaluated in relation to an analysis of traffic congestion and air emissions in the 4051 So. Alameda Street project. Those two are the huge Wilshire and Figueroa construction project, as well as the possibility of building an NFL stadium at the site of the West Hall of the L.A. Convention Center. How many construction-related vehicles for those projects use Alameda Street / Corridor, and would be slowed by the congestion around the 4051 So. Alameda site due to construction and operation of the proposed sweatshops?

RESPONSE NO. E13-4

Your comment regarding related projects and cumulative traffic impacts from the proposed project has been noted. The 11 other construction projects mentioned in the comment will be required to conduct a traffic impact analysis if they exceed the trip generation and distribution requirements of the LADOT. The State CEQA Guidelines require all projects to define the project environmental setting at the time and condition as presented in the Notice of Preparation. The methodology for addressing cumulative projects in the general vicinity is determined by looking at projects within the 2-mile radius of the proposed project. Based on this methodology, it is determined that there are 11 projects within a 2-mile radius of the proposed project site. Of these 11 projects, 5 are located in the direct trip path and near geographic proximity to the proposed project site such that these related projects could affect the cumulative impact analysis of the proposed project within the construction period (Table II.B-1, *Related Projects*, Figure II.B-1, *Related Projects*). The two construction project mentioned in the comment are outside of the 2-mile radius of the proposed project. However, as shown in Table IV.G-7 (*Future 2016 Conditions Without Project*, which include traffic from related projects, and *Future 2016 Conditions With the Proposed Project*, which include traffic from related projects as well as the proposed project), the proposed project would be expected to result in a less than significant cumulative impact in relation to traffic and transportation with the exception of traffic impacts at the intersection of Alameda Street and East Washington Boulevard. However, the implementation of the proposed project would not be expected to result in cumulative impacts when considered with construction of the related past, present, or reasonably foreseeable projects.

Therefore, the proposed project would not be anticipated to contribute significantly to traffic congestion at Wilshire and Figueroa construction projects, including the NFL stadium at the L.A. Convention Center.

COMMENT NO. E13-5

Now I will get into why a monitoring station for air contaminants on North Main Street (north/northeast of Chinatown) fails miserably to account for what is in the air of the Alameda Corridor. The Alameda

Corridor has especially toxic air contaminants being emitted due to it being such a key goods movement area. Also, the emissions related to LA International Airport flights waft up to the 4051 So. Alameda site. Plus, look at the immediate area of the proposed project site. There is Alameda Street and the Corridor virtually right there, and the Harbor Freeway is to the west and the Long Beach Freeway to the east.

If one compares that with the air monitoring station on North Main Street, in that general vicinity are the narrow "Cornfields" park and the larger fairly nearby Elysian Park (which could help filter some air contaminants to make the air toxics readings less). Plus though the Harbor Freeway is in the general area, yet trucks are not allowed north of downtown L.A. on the 110, so one would not expect major diesel emissions from that thoroughfare at that point. Interstate 5 is in the vicinity to the east, and it does have some diesel and goods movement – but is not immersed in a region where diesel-spewing vehicles transporting goods (such is the case with the 4051 So. Alameda site).

RESPONSE NO. E13-5

Your comment about the validity of air quality monitoring stations has been noted. SCAQMD monitors air quality through a network of 35 permanent, multi-pollutant monitoring stations and 5 additional single pollutant monitoring stations for source lead in the Basin and a portion of the Salton Sea Air Basin in Coachella Valley. The closest monitoring station to the proposed project is the Los Angeles-North Main Street Monitoring Station, located approximately 4 miles north of the proposed project at 1630 North Main Street, Los Angeles, California 90012. The monitoring stations provide ambient air quality data for the criteria air pollutants. These air quality monitoring stations are responsible for capturing existing emissions that may impact the proposed project area. As your concern relates to diesel emissions along transportation corridors, these DPM emissions are addressed through the health risk assessment (in the impact analysis and Appendix V of the Draft EIR) designed to measure the cancer risk from mobile trips. The air monitoring station just serves as a basis for the existing condition.

COMMENT NO. E13-6

Do not forget that CEQA Guidelines, Section 15130, says that an EIR is required to "consider the significant environmental impacts of a project as well as 'cumulative impacts'." I await a more thorough cumulative impacts analysis in regards to toxic air contaminants, in regards to impacts of such on sensitive receptors, and in regards to health and safety impact of construction and operation on a very toxic site (4051 So. Alameda).

Recall that CEQA Section 15355 defines cumulative impact as "an impact that is created as a result of the combination of the project evaluated in the EIR together with other projects causing related impacts." Clearly, construction emissions and hauling workers and equipment to construction sites (such as 4051 So. Alameda – as well as for the proposed NFL stadium at the Conv Ctr site as well as the giant construction project now taking place at Wilshire and Figueroa.

CEQA Section 15130 (a)[1} does not so much apply here – since the vehicles destined for the different sites do overlap and emit toxic air emissions – so it is in part due to 4051 So. Alameda proposed project with the emitting vehicles that they attract.

We need a CEQA cumulative impacts analysis on impact to worker health and safety from construction and operational activities on the site.

RESPONSE NO. E13-6

The City of Los Angeles has noted the comment on cumulative impacts on worker health and safety in regard to CEQA. Health risks are covered in the HRA (Appendix V of the Draft EIR) and in Section IV.B *Air Quality* of the Draft EIR. Worker safety is not specifically included as part of an EIR done under CEQA, except as it relates to one or more potentially significant environmental impacts of the proposed project. SCAQMD's *CEQA Air Quality Handbook* identifies several methods to determine the cumulative significance of land use projects (i.e., whether the contribution of a project is cumulatively considerable pursuant to CEQA Guidelines Section 15130). However, the SCAQMD no longer recommends the use of these methodologies. Instead, according to SCAQMD's *White Paper on Regulatory Options for Addressing Cumulative Impacts from Air Pollution Emissions*, the new recommendation says if any emissions from individual development projects exceed the project-specific mass daily emissions thresholds, then they must also be considered cumulatively considerable. The SCAQMD neither recommends quantified analyses of the emissions generated by a set of cumulative development projects nor provides thresholds of significance to be used to assess the impacts associated with these emissions. Further information on cumulative impacts and exposure to sensitive receptors with respect to Air Quality can be found in Section IV. B-22 of the Draft EIR. Regarding construction-phase emissions, as discussed in the aforementioned section, emissions during construction of the proposed project as analyzed in the Draft EIR would be reduced to below the level of significance with the implementation of Mitigation Measures Air-1 through Air-7. Therefore, implementation of the proposed project would not be expected to result in cumulative impacts when considered with construction of the related past, present or reasonably foreseeable projects.

COMMENT NO. E13-7

Environmental Justice is clearly an Area of Controversy – will it be analyzed for in a recirculated DEIR?

RESPONSE NO. E13-7

CEQA centers on whether a project may have a significant effect on the physical environment (CEQA Guidelines, 15064(d)). The purpose of an environmental impact report is to identify the significant effects on the environment of a project, to identify alternatives to the project, and to indicate the manner in which those significant effects can be mitigated or avoided (Pub. Res. Code, §21002.1 subd. (a)). Environmental justice is not considered an area of impact under CEQA, and CEQA does not ask that a project mitigate preexisting conditions. As noted in CEQA Guidelines Section 15064(b), the significance of an activity may vary with the environmental setting. Where there already is a high pollution burden on a community, the relevant question is whether an additional amount of pollution should be considered significant in light of the serious nature of the existing problem.[36]

The Existing Conditions section in Section IV.B *Air Quality* of the Draft EIR includes ambient air quality data gathered from the local air quality monitoring stations. The average concentrations and days above the standard for each criteria air pollutant are listed in Table IV.B-6 *Summary of 2010-2012 Ambient Air Quality Data in the Proposed Project Vicinity* on page IV.B-11 of the Draft EIR. The Air Quality impact analysis relative to the impacts of the proposed project has been further detailed in Section IV.B *Air Quality* of the Draft EIR and in Response to Comment No. E10-38 above.

[36] Harris, Kamala D. 10 July 2012. *Environmental Justice at the Local and Regional Level: Legal Background*. Prepared by State of California Department of Justice. Available at: http://oag.ca.gov/sites/all/files/agweb/pdfs/environment/ej_fact_sheet.pdf

COMMENT NO. E13-8

Remember construction equipment emissions are considerably cumulative.

RESPONSE NO. E13-8

See Response to Comment Nos. E13-6 and E13-3. Further information on cumulative impacts with respect to Air Quality can be found in Section IV. B-22 of the Draft EIR.

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LETTER NO. E14

Bruce Campbell – Letter No. 5

COMMENT NO. E14-1

Of course I am seeking additional responses in the new DEIR to respond to many concerns which I brought up, not just calling for the addition of excluded letter(s), but with the exact same wording by the applicant to be re-circulated.

RESPONSE NO. E14-1

Your comment regarding your previous comments in your letter submitted for the Notice of Preparation has been noted. Your letter was inadvertently left out of Appendix II of the Draft EIR. However, your comments have been addressed in the body of the Draft EIR, consistent with the approach to all the comments from the scoping period. In addition, your NOP comments have been responded to individually as requested in comment letter E10, and can be found above. Your letter has been added to Appendix II as part of Section IV, *Corrections and Additions to the Draft EIR* of the Final EIR.

COMMENT NO. E14-2

Some of my points (but not all) where I saw no discussion of the subject in the documents include considering the Alameda / Central neighborhood in an "Environmental Justice" analysis – and I referred to the vicinity as a "sacrifice zone". I also asked for analysis of "black carbon" toxic emissions to be analyzed both in terms of toxicity of air pollutants relating to the project's construction phase emissions (and preferably relating to Greenhouse Gases as well) – but I was unable to locate any discussion of that significant toxin in the DEIR and associated documents.

RESPONSE NO. E14-2

CEQA centers on whether a project may have a significant effect on the physical environment (CEQA Guidelines, 15064(d)). The purpose of an environmental impact report is to identify the significant effects on the environment of a project, to identify alternatives to the project, and to indicate the manner in which those significant effects can be mitigated or avoided (Pub. Res. Code, §21002.1 subd. (a)). Environmental justice is not considered an area of impact under CEQA, and CEQA does not ask that a project mitigate preexisting conditions. As noted in CEQA Guidelines Section 15064(b), the significance of an activity may vary with the environmental setting. Where there already is a high pollution burden on a community, the relevant question is whether an additional amount of pollution should be considered significant in light of the serious nature of the existing problem.[37]

The Existing Conditions section in Section IV.B *Air Quality* of the Draft EIR includes ambient air quality data gathered from the local air quality monitoring stations. The average concentrations and days above the standard for each criteria air pollutant are listed in Table IV.B-6 *Summary of 2010-2012 Ambient Air Quality Data in the Proposed Project Vicinity* on page IV.B-11 of the Draft EIR. The Air Quality impact analysis relative to the impacts of the proposed project has been further detailed in Section IV.B *Air Quality* of the Draft EIR, and in Response to Comment No. E10-38 above.

[37] Harris, Kamala D. 10 July 2012. *Environmental Justice at the Local and Regional Level: Legal Background*. Prepared by State of California Department of Justice. Available at: http://oag.ca.gov/sites/all/files/agweb/pdfs/environment/ej_fact_sheet.pdf

Black carbon is not a criteria air pollutant according to the California Air Resources Board (CARB) and is not measured specifically in the air analysis for the proposed project. There is no standard or threshold established for black carbon. The impacts of black carbon are considered in the analysis of $PM_{2.5}$ and PM_{10} because black carbon is a component of diesel particulate matter emissions, which are quantified in Table IV.B-8 and Table IV.B-9 in Section IV.B *Air Quality* of the Draft EIR

COMMENT NO. E14-3

I called for the document to state exactly what kind of trucks would be allowed into the 4051 South Alameda site (including specifically asking about 53-foot trailers with large sleeper cabs which are so difficult to maneuver on many urban streets), while another person who focused on truck-related comments was also unable to find his comment on the NOP.

RESPONSE NO. E14-3

Your comment inquiring about the type of trucks used in the proposed project has been noted. The applicant has specified that truck traffic will consist of cargo vans and box trucks only; no large diesel semi-tractor trucks are included in the daily traffic to the site, thus further reducing potentially harmful emissions. Additionally, please see the revised Figure IV.G-1, *Access Driveways*, in Section IV, page IV-6, *Corrections and Additions to the Draft EIR*, for a diagram for maneuvering a 65-foot-long tractor trailer on-site.

COMMENT NO. E14-4

And there is more, but I am trying to work on new comments at this time rather than do house-cleaning regarding the bureaucratic snafu which excluded my (and perhaps other) comment letters on the NOP.

RESPONSE NO. E14-4

Your comment has been noted by the City.

LETTER NO. E15

Bruce Campbell – Letter No. 6

COMMENT NO. E15-1

Due to the exclusion of my comment letter from the Appendixes of the DEIR regarding the 4051 South Alameda Street project, please begin the process to resubmit the DEIR with at least a 45-day comment period. In this circulation, do include my comment letter on the Notice of Preparation which was sent to Ms. Hewawitharana on July 9th, 2014 – as well as all other comment letters on the project whether they were accidentally or purposefully excluded. (I forwarded my original comment letter to Ms. Hewawitharana earlier today to prove that such a comment letter exists and was sent in a timely manner.) It would also be preferable if the letters submitted by the public and by agencies could be viewed taking up more of the screen.

RESPONSE NO. E15-1

Your comment regarding your previous comments in your letter submitted for the Notice of Preparation has been noted. Your letter was inadvertently left out of Appendix II of the Draft EIR. However, your comments have been addressed in the body of the Draft EIR, consistent with the approach to all the comments from the scoping period. In addition, your NOP comments have been responded to individually as requested in Letter No. E10, and can be found above. Your letter will be added to Appendix II as part of Section IV, *Corrections and Additions to the Draft EIR* of the Final EIR.

COMMENT NO. E15-2

It may be a metaphor for the land-use process in the City of L.A., but why should the applicant's pages of info cover the whole computer screen, while I have to squint with my computer glasses on in order to see what the public said in comments covering a small portion of the screen? Of course, it is easier to hide the fact that certain comments were excluded if the scrolling process is a laborious process and has real small print. But, I ask for my comment letter dated July 8th, 2014, and sent via e-mail on July 9th, 2014, to be included in a recirculated DEIR – preferably in a large enough size to read.

RESPONSE NO. E15-2

The City has noted your comment regarding the screen resolution of the City's webpage. This comment is beyond the scope of this document.

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LETTER NO. E16

Antonio Cano

COMMENT NO. E16-1

My name is Antonio T. Cano. I have been working at IMPACT for 5 years. I am very pleased to be working with this company and happy to have more work. I hope that the company continues to grow so that we can continue years to come. May God bless the boss.

RESPONSE NO. E16-1

Your comment on the proposed project has been noted. Your concerns will be taken into consideration by the decision makers prior to taking action on the proposed project.

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LETTER NO. E17

Jesus Chagoya

COMMENT NO. E17-1

Hi mi name is Jesus Chagoya, I live on 8th St. of Los Angeles CA. I have been living in Los Angeles for about 13 years now. I have been working at Impact Inc. since December 2013. I started working in the bundling area, and then I was moved as a production assistant. Ever since I started working here it has helped in economically because of the over time our boss offer us. I am really happy working at impact, everybody is nice to each other here we get along good. Some days during the week the boss lets us stay after work since we have sports activities such as soccer & basketball. Working at Impact has helped me afford a better living for me and family since my mom depends on me. Impact has been great for me because I have met people in here that I consider as second family we celebrate our birthdays together and we share some great moments.

RESPONSE NO. E17-1

Your comment on the proposed project has been noted. Your concerns will be taken into consideration by the decision-makers prior to taking action on the proposed project.

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LETTER NO. E18

Carmelo Cruz

COMMENT NO. E18-1

My name is Carmelo Cruz. I have worked at IMPACT for over 25 years. I know my boss very well. He is a very kind person and appreciates our work. We have had no problems with the boss and he provides much work as well as over time. I am in charge of opening the factory (warehouse), I clean and set out the materials (supplies) for the day's work. I am always punctual for work. I have no problems with my coworkers and get along quite well.

RESPONSE NO. E18-1

Your comment on the proposed project has been noted. Your concerns will be taken into consideration by the decision-makers prior to taking action on the proposed project.

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LETTER NO. E19

Juan Diego

COMMENT NO. E19-1

My name is Diego Juan. I work at IMPACT. I started working in 2009. He's an excellent boss. Thanks to him, I have a lot of work.

RESPONSE NO. E19-1

Your comment on the proposed project has been noted. Your concerns will be taken into consideration by the decision makers prior to taking action on the proposed project.

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LETTER NO. E20

Leticia Flores

COMMENT NO. E20-1

I've been living on Central st Los Angeles for 10 years. I have been working at Impact for almost 4 years as a receptionist. I'm really happy with my position and I thank my boss for giving me this opportunity to work at Impact. Working at Impact has given me the chance to learn so many new things in the past years. I really like my job because I meet new people and I keep learning new things from all the people around me. I get more experience each year which I know that it will help me a lot and I also get to experience new things. This job has help me and my family because my dad has health problems and can't work, thus I'm the one supporting my family of seven including me. It has really helped me economically because I can give my family what they really need.

RESPONSE NO. E20-1

Your comment on the proposed project has been noted. Your concerns will be taken into consideration by the decision-makers prior to taking action on the proposed project.

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LETTER NO. E21

Gwendolyn Forrest

COMMENT NO. E21-1

Please resist the temptation of pitting jobs against the environment! We need your wise leadership on this issue.

RESPONSE NO. E21-1

Your comment has been noted by the City. Your concerns will be taken into consideration by the decision-makers prior to taking action on the proposed project.

COMMENT NO. E21-2

South LA Sweatshops will have long term detrimental health impact to the residents of South Central Los Angeles

The City Planning Department has announced its intention to allow 4 warehouses to be built with a substandard Draft Environmental Impact Report (Case Number: ENV-2012-920-EIR, AA-2012-919-PMLA, DIR-2013-887-SPR), a move Farm representatives and the community say will have long term detrimental health impacts for local South LA residents. Plans call for 4 warehouse facilities that will draw some 75 diesel big rigs into the area every day, creating an intolerable concentration of diesel fumes and particulate matter in a neighborhood in a warehousing district already saturated with such exhaust, posing the danger of increased risks of cancer, emphysema, asthma, and increased hospitalizations to poor people of color who live in the district. South Central Farm representative Tezozomoc said, "This is an unmistakable and undeniable threat to the health and well being of the people who live here, and that the City Planning Department has accepted a substandard Draft Environmental Impact Report on behalf of PIMA is a clear cut example of environmental racism." I call on the city, " to unconditionally reject the DEIR and return the land to the community to anchor an environmental justice project to begin to clean up the community".

RESPONSE NO. E21-2

Your comment in regard to the health risks from the diesel truck trips generated by the proposed project has been noted. The construction phase air quality impact analysis can be found in the Impact Analysis portion of Section IV.B *Air Quality* of the Draft EIR. Construction related toxic air contaminants (TACs) from diesel particulate emissions will be short-lived (3 months), and therefore do not require a Health Risk Assessment (HRA) from the Office of Environmental Health Hazard Assessment (OEHHA). Diesel particulate emissions only affect the population on a long-term (70-year) basis for cancer impacts, so the impact of short-term TACs from the construction of the proposed project is considered less than significant, as analyzed in Section IV.B (pages IV.B-15 through -18) of the Draft EIR. Construction emissions were analyzed for the six main criteria air pollutants as evident in Table IV.B-8. Emissions from VOCs, NOx, CO, SOx, and $PM_{2.5}$ were calculated to be below the SCAQMD significance threshold. PM_{10}, does have a significant impact during the construction phase, but it can be reduced to below the level of significance with mitigation measures.

For the operations of the proposed project, Section IV.G, *Transportation/Traffic* of the Draft EIR considered 351 truck trips/day based on Institute of Transportation Engineers guidelines. Of the 351, EMFAC 2011, an emissions factor model, estimates that on average 9 percent of the total trucks are diesel

fueled trucks for an estimate of 31 diesel fueled trucks, as mentioned in the Human Health Risk Analysis portion of Section IV.B *Air Quality* of the Draft EIR. Because the total daily truck trips are greater than 100, a refined Health Risk Assessment for operational impacts was conducted that identified sensitive receptors and individual cancer risk. Diesel particulate is the majority of health risk among the TACs emitted from both diesel- and gasoline-fueled vehicles, so only diesel particulate emissions are considered for the Health Risk Assessment. As described in Section IV.B (page IV.B-22) of the Draft EIR, the resulting maximum potential cancer risk is 0.3 in a million, which is only 3 percent of the cancer risk threshold of 10 in a million as set by the South Coast Air Quality Management District Rule 1401. In addition to the cancer risk, operational emissions associated with the proposed project for the six main criteria air pollutants are quantified in Table IV.B-9, Unmitigated Estimated Daily Operational Emissions, of the Draft EIR, and were found to be below thresholds of significance established by SCAQMD. Therefore, the proposed project would not result in significant human health risks related to diesel emissions. Further details on the air quality impacts analysis in the operational phase can be found in pages IV.B18 –B22 of the Draft EIR.

With Alternative C, Reduced Truck Operations, truck trips would be limited to 75 truck trips per day. As a result, the maximum cancer risk drops to 0.6 percent of the allowable threshold. The alternatives with clean fuel trucks and reduced truck operations would result in fewer diesel emissions.

CEQA centers on whether a project may have a significant effect on the physical environment (CEQA Guidelines, 15064(d)). The purpose of an environmental impact report is to identify the significant effects on the environment of a project, to identify alternatives to the project, and to indicate the manner in which those significant effects can be mitigated or avoided (Pub. Res. Code, §21002.1 subd. (a)). Environmental justice is not considered an area of impact under CEQA, and CEQA does not ask that a project mitigate preexisting conditions. As noted in CEQA Guidelines Section 15064(b), the significance of an activity may vary with the environmental setting. Where there already is a high pollution burden on a community, the relevant question is whether an additional amount of pollution should be considered significant in light of the serious nature of the existing problem.[38]

The Existing Conditions section in Section IV.B *Air Quality* of the Draft EIR includes ambient air quality data gathered from the local air quality monitoring stations. The average concentrations and days above the standard for each criteria air pollutant are listed in Table IV.B-6 *Summary of 2010-2012 Ambient Air Quality Data in the Proposed Project Vicinity* on page IV.B-11 of the Draft EIR. The Air Quality impact analysis relative to the impacts of the proposed project has been further detailed above in this Response to Comment No. E21-1, and is located in Section IV.B *Air Quality* of the Draft EIR. In the Draft EIR, sensitive receptors are defined on page IV.B-11. There are two maps showing their locations: Figure IV.B-1 *Sensitive Receptors* and Figure IV. B-2 *Receptor Grid and Sensitive Receptors*.

COMMENT NO. E21-3

It is clear that Los Angeles City has failed the residents of South LA by considering a substandard DEIR. In 2008 the City of Los Angeles reviewed a project submitted by Horowitz to do one warehouse that encompassed 437,196 sq. ft. (see Case No. ENV-2008-799-MND, VTT-61482, DIR-2008-841-SPR, aka 41st and Alameda Warehouse Project) and at that time there would be 264 truck trips per day. In the recent DEIR PIMA will be developing 481,022 sq. ft. of warehouse space; comprised of 4 buildings and over 2000 car trips per day. In PIMA's proposal they claim a mere 75 trip trucks a day. There is a difference of 189 truck trips per days for a warehouse space that is 10% larger. There is a difference of

[38] Harris, Kamala D. 10 July 2012. *Environmental Justice at the Local and Regional Level: Legal Background*. Prepared by State of California Department of Justice. Available at: http://oag.ca.gov/sites/all/files/agweb/pdfs/environment/ej_fact_sheet.pdf

70% in truck trips. What is problematic with this assumption is that all further analysis will be based on the underspecified 75 truck trips per day. While this under estimation of the truck trips may get the project approved by the City; the city under Jan Perry has supported this project, it will have long negative impact on the residents of South Los Angeles. In the realm of Air Quality Health Risk Assessment the truck trips are further down estimated to 31 diesel fueled trucks per day. The Kleinfelder's Health Risk Analysis is faulty because it also assumes a degraded amount of truck trips per day; 75 truck trips per day.

RESPONSE NO. E21-3

The City of Los Angeles has noted the concern about the discrepancy in the number of truck trips and the resulting health risks. A total of 351 truck trips is assumed in the Air Quality Health Risk Assessment (Appendix V in Volume IV of the Draft EIR) and Section IV.B, *Air Quality*, of the Draft EIR based on the Addendum to the Traffic Impact Study (Appendix IX in Volume VI of the Draft EIR). Of the 351 truck trips, EMFAC 2011 estimates that on average 9 percent of the total trucks are diesel fueled trucks for an estimate of 31 diesel-fueled trucks as mentioned in the Human Health Risk Analysis portion of Section IV.B *Air Quality* of the Draft EIR.

The Draft EIR states on page IV.G-13 that

> *It is calculated that the proposed project will generate approximately 1,966 net passenger car equivalent (PCE) trips per average day. The average weekday net new peak hour PCE trips will be approximately 179 trips during the a.m. peak hour and 190 trips during the p.m. peak hours (Figure IV.G-6, Distribution of Project Traffic, and Figure IV.G-7, Existing [2014] plus Project Traffic Volumes). The traffic analysis also considered the distribution of trips during a.m. and p.m. peak hours in the vicinity of the proposed project (Figure IV.G- 8, Project Traffic at Driveways and Adjacent Intersections).*
>
> *While these estimates were developed based on the ITE's Trip Generation Manual, the project applicant has indicated that truck trips associated with operation of the proposed project would not exceed 75 daily truck trips, which has therefore been analyzed as Alternative C in this Draft EIR (see Attachment E to the Initial Study, which is Appendix III of this Draft EIR).*

The 75 truck trips identified in Alternative C stem from the existing operations at various facilities, which will be consolidated in the proposed project. Currently, there is a maximum of 33 truck trips/day total for the various facilities. The proposed project build out is not expected to significantly increase this number of trips; hence, 75 daily truck trips were taken as the assumption in Alternative C of the Draft EIR.

COMMENT NO. E21-4

Regional Air Quality

The air quality in Southern California does not meet the state and federal standards. The American Lung Association consistently gives Los Angeles County failing grades in the amount of ozone and particulate pollution in the air. Although smog levels are impacted by seasons and weather patterns, smog is visible in the air on most days.

RESPONSE NO. E21-4

The City of Los Angeles has noted the comment about poor air quality in the region as defined by the American Lung Association. The American Lung Association gives an "F" rating for ozone, particulate

pollution (24-hour), and particulate pollution (annual) for Los Angeles County. In regard to the California Ambient Air Quality Standards, Los Angeles County has also been designated nonattainment for ozone, PM_{10}, $PM_{2.5}$, nitrogen dioxide, and lead. The Draft EIR evaluates the proposed project with respect to the State CEQA Guidelines. Construction and operations emissions were modeled and compared to the South Coast Air Quality Management District (SCAQMD) Significance Thresholds. Only the PM_{10} construction emissions were found to exceed the SCAQMD significance threshold by 5.6 lbs/day. Mitigation measures are described in the Draft EIR on page IV.B-23 and IV.B-24, which reduce air quality impacts below the threshold of significance. All other criteria pollutants are expected to be below the SCAQMD significance thresholds for both construction and operation phases. The proposed project is expected to be consistent with the regional 2012 Air Quality Management Plan. Please see pages IV.B-16, IV.B-17, and IV.B-19 of the Draft EIR for further information regarding the proposed project's consistency with state and regional air quality plans.

LETTER NO. E22

Janneth Garcia

COMMENT NO. E22-1

I live on Figueroa los Angeles, over 27 years, I've been working at impact since October 2006, I started as a receptionist , then I was promoted to Pre- production assistant and doing some production manager as well. I been learning mostly everything along the years. Along With my knowledge my compensation has grown over the years, I've been able to achieve new things in my life and By helping me learn many things that will help me in the future. working at impact has made me learn so much about the fashion design and made me understand how impact makes everything possible to achieve everything for their customers. Me and my coworkers always try our best to achieve everything that comes to us. I feel really happy to see famous people wearing our products that we made at impact. This job has help me to be able to help my family In every way that I can.

RESPONSE NO. E22-1

Your comment on the proposed project has been noted. Your concerns will be taken into consideration by the decision-makers prior to taking action on the proposed project.

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LETTER NO. E23

Maria Garcia

COMMENT NO. E23-1

I've been living in Figueroa st Los Angeles for 24 years; I've worked for impact for 4 years as pre-production assistant in samples and developments. I have learn so many things in this past years I thank my boss for giving me this chance to work for his company. I am a single mother so this opportunity has help me a lot economic and to learn things. I love my job we get to meet new people and work big companies. I'm really happy to work with impact and experience new things. I feel glad to see famous people wearing our products that we made here at impact. This has help me so much to give my child and family all the help I can.

RESPONSE NO. E23-1

Your comment on the proposed project has been noted. Your concerns will be taken into consideration by the decision-makers prior to taking action on the proposed project.

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LETTER NO. E24

Artemio Gonzalez

COMMENT NO. E24-1

Hello, my name is Artemio Gonzalez. I live on Avalon and 41st. I am a father of three children who are my reason for advancement (succeeding) in this country. I have lived in Los Angeles 27 years and work as a manager at IMPACT. Thanks to my efforts and performance, this company has given me more than I thought I could achieve in my life. I am completely satisfied with my work and I really love my job. The employees are like family. I hope IMPACT can achieve the goals and what it is trying to accomplish as it would be a great favor to all the employees and people who need a steady job and great benefits. Please, whoever is in receipt of this correspondence, thank you for everything.

RESPONSE NO. E24-1

Your comment on the proposed project has been noted. Your concerns will be taken into consideration by the decision-makers prior to taking action on the proposed project.

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LETTER NO. E25

Crystal Gonzalez

COMMENT NO. E25-1

In regards to the project (4051 South Alameda Street Project), please halt the plans to build an industrial park in South Los Angeles. South LA needs more green space for its residents, not more industrial parks. I am a High School teacher. I see the dreams of youth: They want Los Angeles be a place where they can live, breath clean air, be in community, and thrive. At the moment youth feel like it is a place they want to leave, not a place they want to stay.

RESPONSE NO. E25-1

Your comment expressing concern for today's youth and the need for more green space in South Los Angeles has been noted. Section VI, *Alternatives*, of the Draft EIR, specifically pages VI-3 and VI-4, addresses the possibility of alternate land use alternatives such as a community garden and a park/recreational use.

Section 15126.6 of the CEQA Guidelines requires an EIR to describe a range of reasonable alternatives to a project or to the location of a project that would feasibly attain most of the basic objectives of a project but would avoid or substantially lessen any of the significant effects of a project, and evaluate the comparative merits of the alternatives. The discussion of alternatives, however, need not be exhaustive, but rather the discussion must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. An EIR is not required to consider alternatives that are deemed "infeasible." In developing alternatives, the following factors are considered: (i) ability to meet most of the basic project objectives, (ii) feasibility, or (iii) ability to avoid or substantially lessen significant environmental impacts.

As set forth in Section VI of the Draft EIR on pages VI-3 to VI-4, the Community Garden alternative, requested through public comments, considered development of the project for an alternate land use, specifically a community garden. However, this alternative was withdrawn from consideration as it does not meet the basic project objectives:

- A community garden or park would not attain the objective of providing a minimum of 480,000 square feet of light industrial space, consistent with the existing land use designation and zoning.
- A community garden or park would not provide light manufacturing jobs within 3 miles of an existing garment manufacturing labor force in the Southeast Los Angeles Community Plan Area.
- A community garden or park would not allow for development of an industrial park that is along the Alameda Corridor to take advantage of distribution efficiency opportunities.
- A community garden or park would not facilitate the ability of existing garment labor force, located in close proximity to the project site to utilize existing public transit system and other multi-modal transportation opportunities in vicinity of proposed project.

- A community garden or park would not preserve and/or redevelop the industrial sector of the Southeast Los Angeles Community Plan Area to accommodate emerging technologies, thus providing an enhanced employment base for the Community Plan Area's population.

- A community garden or park would not benefit the Southeast Los Angeles Community Plan area population as economic stimulation through employment opportunities, attracting commercial and industrial tenants to the area, and providing tax revenue for the City would not occur.

The proposed use of the property as light manufacturing is consistent with land use planning objectives articulated in the Southeast Los Angeles Community Plan. The City of Los Angeles Southeast Los Angeles Community Plan has designated the project site as light industrial. The land use designation discourages nonindustrial uses and uses that compromise job-producing potential. Plan Goal 3 supports sufficient land for a variety of industrial uses with maximum employment opportunities, which are safe for the environment and the work force, and which have minimal adverse impacts on adjacent uses. The South East Los Angeles Community Plan further supports the retention and redevelopment of the industrial sector through Objective 3-1, Policy 3-1.1, and Objective 3-2, Policy 3-2.1:

> **Objective 3-1** To provide for existing and future industrial uses which contribute job opportunities for residents and which minimize environmental and visual impacts to the community.
>
> **Policies**
> 3-1.1 Designate lands for the continuation of existing industry and development of new industrial parks, research and development uses, light manufacturing, and similar uses which provide employment opportunities.
>
> **Objective 3-2** To retain industrial plan designations to maintain the industrial employment base for community residents and to increase it whenever possible.
>
> **Policies**
> 3-2.1 The significant, large industrially planned parcels located in predominantly industrial areas associated with the railroad transportation facilities along Alameda and in the Slauson area should be protected from development by other uses which do not support the industrial base of the community, and the City.

The Southeast Los Angeles Community Plan's open space goals and objectives support the preservation of existing open space and the development of new open space, in balance with new development, to serve the recreational, environmental, health and safety needs of the community. The objectives further note that the "Plan Map designates lands for open spaces including parklands." As noted above, the project site is in an industrial corridor adjacent to the Alameda Corridor rail line, and it is not designated for open space on the plan map. The area surrounding the proposed project site is developed almost exclusively with light and heavy industrial uses, with limited small lot single family residential homes intermixed with light/industrial warehouse uses to the south and residential areas farther to the west. The Alameda Corridor rail line is located directly to the east and runs below grade in the project area, and also includes the Southern Pacific Railroad right-of-way across South Alameda Street. The Metro Blue Line light rail is located immediately to the west of the project site. The nearest designated open space is the Ross Snyder Recreation Center, located 0.2 mile west of the proposed project site.

The applicant acknowledges the former interim use of the project site as a community garden that

occurred under previous ownership. However, the use was discontinued in 2006, and the project site is currently vacant underutilized land in an industrially zoned area. Appendix XII and Section III.E of the Draft EIR provide details of a 2003 settlement agreement between the prior owner and the City of Los Angeles to dedicate 2.6 acres of the property for maintenance of a park for recreation and park purposes, and subsequent amendment of the agreement to allow the proposed project to be developed. This amendment for the cash pledge provided the City or a nonprofit organization with the funds to dedicate a park in a more appropriate location than the project site, which is industrially zoned and isolated to the west and east by major rail lines. The City Council accordingly determined that establishment of an active use park on the property is inappropriate due to the property's location in an industrial corridor, and authorized execution of a Cash Pledge Agreement whereby a payment in the amount of $3,573,365 was made to improve and provide recreational and park facilities at more suitable alternate sites in the vicinity of the property (see Report of the Chief Legislative Analyst, Ordinance No. 181949, and City Council Motion included in Appendix XII of the Draft EIR). The value of the cash pledge was determined on the basis of the pro rata value of the 2.6 acres to be set aside for recreational purposes pursuant to the settlement agreement relative to the overall purchase price of the project site. For further information on the site background and cash pledge agreement for park and recreational uses, please see pages IV-3 and IV-4 of Section IV, *Corrections and Additions to the Draft EIR* of this Final EIR, and pages III-6 and III-7 and Appendix XII of the Draft EIR.

As stated in the Draft EIR and summarized above, the project's cash pledge agreement will contribute to open space in the City in a more suitable location, while the project site would be developed consistent with its Community Plan designation, goals and policies, and the project objectives.

COMMENT NO. E25-2

I understand that industrial parks have the potential to create jobs, but green spaces can also create jobs. We need to start thinking about development in sustainable and creative ways.

RESPONSE NO. E25-2

Your comment on how to balance jobs versus the environment has been noted. As further detailed in Response to Comment No. E25-1 above, the Community Garden alternative, requested through public comments, considered development of the project for an alternate land use, specifically a community garden. However, this alternative was withdrawn from consideration as it does not meet the basic project objectives. The proposed project better meets the basic objectives of the project by constructing a new industrial park that provides a minimum of 480,000 square feet of light industrial space to facilitate garment manufacturing, locating a new industrial park within 3 miles of an existing garment manufacturing labor force in the Southeast Los Angeles Community Plan Area, developing an industrial park that is along the Alameda Corridor to take advantage of distribution efficiency opportunities, providing opportunities for the project's labor force to utilize existing public transit systems and other multi-modal transportation opportunities in the vicinity of the proposed project, preserving and/or redeveloping the industrial sector of the Southeast Los Angeles Community Plan Area to accommodate emerging technologies, thus providing an enhanced employment base for the Community Plan Area's population, and providing benefits to the Southeast Los Angeles Community Plan Area population as a result of economic stimulation through employment opportunities, attracting commercial and industrial tenants to the area, and providing tax revenue for the City. As stated in the Draft EIR and summarized above, the project's cash pledge agreement will contribute to open space in the City in a more suitable location, while the project site would be developed consistent with its Community Plan designation, goals and policies, and the project objectives.

COMMENT NO. E25-3

Please halt plans to further industrialize and contaminate South Los Angeles.

RESPONSE NO. E25-3

The City of Los Angeles has noted the comment about industrial use at the proposed project site. However, as detailed in Response to Comment Nos. E25-1 and E25-2 above, the proposed project is consistent with the goals and objectives of the adopted Southeast Lost Angeles Community Plan. Your concerns will be taken into consideration by the decision-makers prior to taking action on the proposed project.

LETTER NO. E26

Maria V. Gonzalez

COMMENT NO. E26-1

I Maria Valentina Gonzalez have been employed by Mr. Tony Yuu since 1998 – 3-9-2015 to present. I'm writing this letter of recommendation for Mr. Yuu. He has been a fair employer and has helped his employees in any way possible. I've been very happy working for him and would like his plans for his company to come to reality, making easier for everyone to work together.

RESPONSE NO. E26-1

Your comment on the proposed project has been noted. Your concerns will be taken into consideration by the decision-makers prior to taking action on the proposed project.

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LETTER NO. E27

Ira Gottlieb
Bush Gottlieb
500 North Central Avenue, Suite 800
Glendale, California 91203

COMMENT NO. E27-1

I am a senior partner union-side labor law attorney with the law firm of Bush Gottlieb, located in Glendale, CA. Although my office is not located within the City of Los Angeles, I represent clients with offices in the City and unions with many members who reside in town, and thus have a stake in the future of Los Angeles as a neighbor living adjacent to the great megalopolis that LA has become.

RESPONSE NO. E27-1

This comment provides background information regarding the law firm of Bush Gottlieb and its interest in commenting on the Draft EIR. Comments on the project and Draft EIR follow with responses.

COMMENT NO. E27-2

I am writing to request revisions in the DEIR for the long-disputed tract of land in South Los Angeles slated for industrial development. I ask that you reconsider your department's failure to recognize the community value in designating the land for gardening and recreational purposes.

RESPONSE NO. E27-2

Your comment regarding the designation of the proposed project site for gardening and recreational purposes has been noted. Section 15126.6 of the CEQA Guidelines requires an EIR to describe a range of reasonable alternatives to a project or to the location of a project that would feasibly attain most of the basic objectives of a project but would avoid or substantially lessen any of the significant effects of a project, and evaluate the comparative merits of the alternatives. The discussion of alternatives, however, need not be exhaustive, but rather the discussion must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. An EIR is not required to consider alternatives that are deemed "infeasible." In developing alternatives, the following factors are considered: (i) ability to meet most of the basic project objectives, (ii) feasibility, or (iii) ability to avoid or substantially lessen significant environmental impacts.

As set forth in Section VI of the Draft EIR on pages VI-3 to VI-4, the Community Garden alternative and the Park and Recreational Use alternative, requested through public comments, considered development of the project for an alternate land use, specifically a community garden. However, this alternative was withdrawn from consideration as it does not meet the basic project objectives:

- A community garden or park would not attain the objective of providing a minimum of 480,000 square feet of light industrial space, consistent with the existing land use designation and zoning.

- A community garden or park would not provide light manufacturing jobs within 3 miles of an existing garment manufacturing labor force in the Southeast Los Angeles Community Plan Area.

- A community garden or park would not allow for development of an industrial park that is along the Alameda Corridor to take advantage of distribution efficiency opportunities.

- A community garden or park would not facilitate the ability of existing garment labor force, located in close proximity to the project site to utilize existing public transit system and other multi-modal transportation opportunities in vicinity of proposed project.

- A community garden or park would not preserve and/or redevelop the industrial sector of the Southeast Los Angeles Community Plan Area to accommodate emerging technologies, thus providing an enhanced employment base for the Community Plan Area's population.

- A community garden or park would not benefit the Southeast Los Angeles Community Plan area population as economic stimulation through employment opportunities, attracting commercial and industrial tenants to the area, and providing tax revenue for the City would not occur.

The proposed use of the property as light manufacturing is consistent with land use planning objectives articulated in the Southeast Los Angeles Community Plan. The City of Los Angeles Southeast Los Angeles Community Plan has designated the project site as light industrial. The land use designation discourages nonindustrial uses and uses that compromise job-producing potential. Plan Goal 3 supports sufficient land for a variety of industrial uses with maximum employment opportunities, which are safe for the environment and the work force, and which have minimal adverse impacts on adjacent uses. The South East Los Angeles Community Plan further supports the retention and redevelopment of the industrial sector through Objective 3-1, Policy 3-1.1, and Objective 3-2, Policy 3-2.1:

> **Objective 3-1** To provide for existing and future industrial uses which contribute job opportunities for residents and which minimize environmental and visual impacts to the community.
>
> **Policies 3-1.1** Designate lands for the continuation of existing industry and development of new industrial parks, research and development uses, light manufacturing, and similar uses which provide employment opportunities.
>
> **Objective 3-2** To retain industrial plan designations to maintain the industrial employment base for community residents and to increase it whenever possible.
>
> **Policies 3-2.1** The significant, large industrially planned parcels located in predominantly industrial areas associated with the railroad transportation facilities along Alameda and in the Slauson area should be protected from development by other uses which do not support the industrial base of the community, and the City.

The Southeast Los Angeles Community Plan's open space goals and objectives support the preservation of existing open space and the development of new open space, in balance with new development, to serve the recreational, environmental, health and safety needs of the community. The objectives further note that the "Plan Map designates lands for open spaces including parklands." As noted above, the

project site is in an industrial corridor adjacent to the Alameda Corridor rail line, and it is not designated for open space on the plan map. The area surrounding the proposed project site is developed almost exclusively with light and heavy industrial uses, with limited small lot single family residential homes intermixed with light/industrial warehouse uses to the south and residential areas farther to the west. The Alameda Corridor rail line is located directly to the east and runs below grade in the project area, and also includes the Southern Pacific Railroad right-of-way across South Alameda Street. The Metro Blue Line light rail is located immediately to the west of the project site. The nearest designated open space is the Ross Snyder Recreation Center, located 0.2 mile west of the proposed project site.

The applicant acknowledges the former interim use of the project site as a community garden that occurred under previous ownership. However, the use was discontinued in 2006, and the project site is currently vacant underutilized land in an industrially zoned area. Appendix XII and Section III.E of the Draft EIR provide details of a 2003 settlement agreement between the prior owner and the City of Los Angeles to dedicate 2.6 acres of the property for maintenance of a park for recreation and park purposes, and subsequent amendment of the agreement to allow the proposed project to be developed. This amendment for the cash pledge provided the City or a nonprofit organization with the funds to dedicate a park in a more appropriate location than the project site, which is industrially zoned and isolated to the west and east by major rail lines. The City Council accordingly determined that establishment of an active use park on the property is inappropriate due to the property's location in an industrial corridor, and authorized execution of a Cash Pledge Agreement whereby a payment in the amount of $3,573,365 was made to improve and provide recreational and park facilities at more suitable alternate sites in the vicinity of the property (see Report of the Chief Legislative Analyst, Ordinance No. 181949, and City Council Motion included in Appendix XII of the Draft EIR). The value of the cash pledge was determined on the basis of the pro rata value of the 2.6 acres to be set aside for recreational purposes pursuant to the settlement agreement relative to the overall purchase price of the project site. For further information on the site background and cash pledge agreement for park and recreational uses, please see pages IV-3 and IV-4 of the Corrections and Additions section of this Final EIR, and pages III-6 and III-7 and Appendix XII of the Draft EIR.

As stated in the Draft EIR and summarized above, the project's cash pledge agreement will contribute to open space in the City in a more suitable location, while the project site would be developed consistent with its Community Plan designation, goals and policies, and the project objectives.

COMMENT NO. E27-3

I have lived in the Los Angeles region for almost 29 years, and am dismayed by the paucity of green space in our concrete-bound culture, both generally and as the shortage is unjustly distributed within the City. A quick Google search reveals comments like "South L.A. is ankle-deep in the worst public land deficit in the city" (http://www.oncentral.org/news/2011/12/22/south-lspark- struggle/). That article published in 2011 went on to note that

"A report issued by the Trust for Public Land, national non-profit aimed at developing public spaces in underserviced areas, found that there were roughly 6.2 acres per every 1,000 people in Los Angeles. It's even worse if you look at individual communities. A study conducted by the UCLA Institute of Environment and Sustainability in 2006 found that African-American and Latino communities receive .8 and 1.6 acres per 1,000 persons respectively, with South Los Angeles averaging less than half an acre per 1,000 residents."

In 2009, a story about the opening of a park in the Baldwin Hills area remarked upon how then City Councilman Mark Ridley-Thomas joked, with some no doubt intended irony, that he was suffering from "nature-deficit disorder." (http://switchboard.nrdc.org/blogs/dnagami/tackling_nature_deficit_disord.html) That article further observed "Urban Los Angeles is one of the most park-poor areas in the nation, with fewer acres of parkland per resident than any other major city. Without adequate green space, these often lower-income communities of color don't receive the many benefits that come with parks, like a healthier local environment, access to low-cost recreation, and the chance to experience and connect with nature up close."

RESPONSE NO. E27-3

Your comment regarding the lack of parkland and open space in Los Angeles has been noted. As described in Response to Comment No. E27-1, the Community Garden alternative and Park and Recreational Use alternative, requested through public comments, considered development of the project for an alternate land use, specifically a community garden or park. However, these alternatives were withdrawn from further analysis, because they do not meet the basic project objectives. The City entered into an agreement with the property owner to provide a cash pledge to meet the City's requirement for parkland. In order to satisfy the City's requirement for recreational use for the community, the City adopted Ordinance No. 181949 on November 23, 2011,[39] whereby funds were contributed to park/recreational development at more suitable alternative sites. As stated in the Draft EIR and summarized above, the project's cash pledge agreement will contribute to open space in the City in a more suitable location, while the project site would be developed consistent with its Community Plan designation, goals and policies, and the project objectives.

COMMENT NO. E27-4

That malady is not unique to high-profile city officials, and has by no means been cured or even mitigated in more recent years. Specifically, I would like to draw your attention to a critical study of the American Institute of Architects (California Council) conducted in 2012 that documented inequities between South Los Angeles and other parts of LA lacking in greenery, open space, and recreational facilities. Click below to read the study:

http://www.aiacc.org/2012/05/29/20792/

If you scroll on the site, you'll note South LA is categorized under the classification of "park poverty" with only 783 acres of parkland, in contrast to West LA with 16, 497 acres. This reflects a history of protecting Westside communities from overdevelopment and allowing some green space to survive against the onslaught of development, but also shows a different, disparate outcome when considering the areas of the most dense populations in the City, which of course need the green space the most:

. . . those areas with 75% or more Latino population (188 census tracts, with over 770,000 residents) had only 0.6 park acres per 1,000 population, and heavily African-American dominated tracts (11 census tracts with almost 50,000 residents) had 1.7 park acres per 1,000 population. In comparison, heavily White dominated areas (117 census tracts with almost 480,000 residents) enjoyed 31.8 park acres per 1,000 residents.

The implications of this disparity and park shortage in disadvantaged densely populated areas are dramatic for young people who have no place to go to run, to chase, kick and throw a ball, enjoy the thrill

[39] Ordinance No. 181949, Report of the Chief Legislative Analyst for Council File No. 11-1524, and Motion, dated February 24, 2012.

of competitive sports, or just gain respite from the drabness of concrete walls and whir of commerce. As a former camp counselor, sports director and avid basketball player born and raised in New York City, I've learned first-hand how important it is, both in terms of physical and mental health, for young people to have parks nearby. As Mahatma Gandhi taught us, "It is health that is real wealth and not pieces of gold and silver."

RESPONSE NO. E27-4

Your comment regarding the lack of parkland and open space in South Los Angeles has been noted. As described in the responses above, the Community Garden alternative and Park and Recreational Use alternative, requested through public comments, considered development of the project for an alternate land use, specifically a community garden or park. However, these alternatives were withdrawn from further analysis, because they do not meet the basic project objectives. The property owner entered into a cash pledge agreement with the City to provide a cash pledge to meet the City's requirement for parkland, whereby funds were contributed to park/recreational development at more suitable alternative sites.

COMMENT NO. E27-5

When we have a choice about what to do with substantial swaths of undeveloped acreage in disadvantaged communities, this green space deficit and the need to serve the future needs of youth (and the not-so-young -- directly and for community quality of life all derive) must be carefully taken into account, with heavy weight afforded to the value of maintaining and enhancing open recreational space.

RESPONSE NO. E27-5

Your comment regarding green space deficits in disadvantaged communities has been noted. As described in the responses above, the property owner entered into a cash pledge agreement with the City to provide a cash pledge to meet the City's requirement for parkland, whereby funds were contributed to park/recreational development at more suitable alternative sites.

COMMENT NO. E27-6

Please revise this DEIR to take into consideration the indispensable community value in setting aside this land for gardening and recreation.

RESPONSE NO. E27-6

Your comment on setting aside this land for gardening and recreation has been noted. As described in the responses above, the Community Garden alternative and Park and Recreational Use alternative, requested through public comments, considered development of the project for an alternate land use, specifically a community garden or park. However, these alternatives were withdrawn from further analysis, because they do not meet the basic project objectives. The City entered into an agreement with the property owner to provide a cash pledge to meet the City's requirement for parkland. In order to satisfy the City's requirement for recreational use for the community, the City adopted Ordinance No. 181949 on November 23, 2011,[40] whereby funds were contributed to park/recreational development at more suitable alternative sites. As stated in the Draft EIR and summarized above, the project's cash pledge agreement will contribute to open space in the City in a more suitable location, while the project site would be developed consistent with its Community Plan designation, goals and policies, and the project objectives.

[40] Ordinance No. 181949, Report of the Chief Legislative Analyst for Council File No. 11-1524, and Motion, dated February 24, 2012.

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LETTER NO. E28

Lisa Green

COMMENT NO. E28-1

I am a former State Assembly Candidate and a current member of the Green Party of Los Angeles and California. I am writing you regarding the DEIR concerning the land known as the South Central Farm. I am an artist in Venice as well as a life coach and spiritual guide for many. Our greater Los Angeles area is riddled with individuals who are suffering from the effects of over population in an urban environment. Noise, traffic, over emphasis on work, and a host of other maladies are affecting people at an alarm rate. Many of my clients have lost their connection to the Earth, our home, and with nature.

I am in opposition of the DEIR based on the following points from the report:

RESPONSE NO. E28-1

This comment provides introductory transmittal comments and does not directly address the contents of the Draft EIR. Comments on the project and Draft EIR follow with responses.

COMMENT NO. E28-2

The DEIR's conclusion that community gardens do not carry local community value.

RESPONSE NO. E28-2

Your comment regarding the community value of gardens has been noted. Section 15126.6 of the CEQA Guidelines requires an EIR to describe a range of reasonable alternatives to a project or to the location of a project that would feasibly attain most of the basic objectives of a project but would avoid or substantially lessen any of the significant effects of a project, and evaluate the comparative merits of the alternatives. The discussion of alternatives, however, need not be exhaustive, but rather the discussion must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. An EIR is not required to consider alternatives that are deemed "infeasible." In developing alternatives, the following factors are considered: (i) ability to meet most of the basic project objectives, (ii) feasibility, or (iii) ability to avoid or substantially lessen significant environmental impacts.

As set forth in Section VI of the Draft EIR on pages VI-3 to VI-4, the Community Garden alternative alternative and Park and Recreational Use alternative, requested through public comments, considered development of the project for an alternate land use, specifically a community garden or park. However, these alternatives were withdrawn from further analysis, because they do not meet the basic project objectives:

- A community garden or park would not attain the objective of providing a minimum of 480,000 square feet of light industrial space, consistent with the existing land use designation and zoning.

- A community garden or park would not provide light manufacturing jobs within 3 miles of an existing garment manufacturing labor force in the Southeast Los Angeles Community Plan Area.

- A community garden or park would not allow for development of an industrial park that is along the Alameda Corridor to take advantage of distribution efficiency opportunities.

- A community garden or park would not facilitate the ability of existing garment labor force, located in close proximity to the project site to utilize existing public transit system and other multi-modal transportation opportunities in vicinity of proposed project.

- A community garden or park would not preserve and/or redevelop the industrial sector of the Southeast Los Angeles Community Plan Area to accommodate emerging technologies, thus providing an enhanced employment base for the Community Plan Area's population.

- A community garden or park would not benefit the Southeast Los Angeles Community Plan area population as economic stimulation through employment opportunities, attracting commercial and industrial tenants to the area, and providing tax revenue for the City would not occur.

The proposed use of the property as light manufacturing is consistent with land use planning objectives articulated in the Southeast Los Angeles Community Plan. The City of Los Angeles Southeast Los Angeles Community Plan has designated the project site as light industrial. The land use designation discourages nonindustrial uses and uses that compromise job-producing potential. Plan Goal 3 supports sufficient land for a variety of industrial uses with maximum employment opportunities, which are safe for the environment and the work force, and which have minimal adverse impacts on adjacent uses. The South East Los Angeles Community Plan further supports the retention and redevelopment of the industrial sector through Objective 3-1, Policy 3-1.1, and Objective 3-2, Policy 3-2.1:

> **Objective 3-1** To provide for existing and future industrial uses which contribute job opportunities for residents and which minimize environmental and visual impacts to the community.
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> **Policies 3-1.1** Designate lands for the continuation of existing industry and development of new industrial parks, research and development uses, light manufacturing, and similar uses which provide employment opportunities.
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> **Policies 3-2.1** The significant, large industrially planned parcels located in predominantly industrial areas associated with the railroad transportation facilities along Alameda and in the Slauson area should be protected from development by other uses which do not support the industrial base of the community, and the City.

The Southeast Los Angeles Community Plan's open space goals and objectives support the preservation of existing open space and the development of new open space, in balance with new development, to serve the recreational, environmental, health and safety needs of the community. The objectives further note that the "Plan Map designates lands for open spaces including parklands." As noted above, the project site is in an industrial corridor adjacent to the Alameda Corridor rail line, and it is not designated for open space on the plan map. The area surrounding the proposed project site is developed almost exclusively with light and heavy industrial uses, with limited small lot single family residential homes intermixed with light/industrial warehouse uses to the south and residential areas farther to the west. The

Alameda Corridor rail line is located directly to the east and runs below grade in the project area, and also includes the Southern Pacific Railroad right-of-way across South Alameda Street. The Metro Blue Line light rail is located immediately to the west of the project site. The nearest designated open space is the Ross Snyder Recreation Center, located 0.2 mile west of the proposed project site.

The applicant acknowledges the former interim use of the project site as a community garden that occurred under previous ownership. However, the use was discontinued in 2006, and the project site is currently vacant underutilized land in an industrially zoned area. Appendix XII and Section III.E of the Draft EIR provide details of a 2003 settlement agreement between the prior owner and the City of Los Angeles to dedicate 2.6 acres of the property for maintenance of a park for recreation and park purposes, and subsequent amendment of the agreement to allow the proposed project to be developed. This amendment for the cash pledge provided the City or a nonprofit organization with the funds to dedicate a park in a more appropriate location than the project site, which is industrially zoned and isolated to the west and east by major rail lines. The City Council accordingly determined that establishment of an active use park on the property is inappropriate due to the property's location in an industrial corridor, and authorized execution of a Cash Pledge Agreement whereby a payment in the amount of $3,573,365 was made to improve and provide recreational and park facilities at more suitable alternate sites in the vicinity of the property (see Report of the Chief Legislative Analyst, Ordinance No. 181949, and City Council Motion included in Appendix XII of the Draft EIR). The value of the cash pledge was determined on the basis of the pro rata value of the 2.6 acres to be set aside for recreational purposes pursuant to the settlement agreement relative to the overall purchase price of the project site. For further information on the site background and cash pledge agreement for park and recreational uses, please see pages IV-3 and IV-4 of Section IV, *Corrections and Additions to the Draft EIR* section of this Final EIR, and pages III-6 and III-7 and Appendix XII of the Draft EIR.

As stated in the Draft EIR and summarized above, the project's cash pledge agreement will contribute to open space in the City in a more suitable location, while the project site would be developed consistent with its Community Plan designation, goals and policies, and the project objectives.

COMMENT NO. E28-3

The DEIR fails to recognize the community value in using the land for recreational purposes.

RESPONSE NO. E28-3

Your comment regarding the use of the proposed project site for recreational purposes has been noted. As discussed in Response to Comment No. E28-2, the Community Garden alternative and Park and Recreational Use alternative, requested through public comments, considered development of the project for an alternate land use, specifically a community garden or park. However, these alternatives were withdrawn from further analysis, because they do not meet basic project objectives.

The applicant acknowledges the former interim use of the project site as a community garden that occurred under previous ownership. However, the use was discontinued in 2006, and the project site is currently vacant underutilized land in an industrially zoned area. Appendix XII and Section III.E of the Draft EIR provide details of a 2003 settlement agreement between the prior owner and the City of Los Angeles to dedicate 2.6 acres of the property for maintenance of a park for recreation and park purposes, and subsequent amendment of the agreement to allow the proposed project to be developed. This amendment for the cash pledge provided the City or a nonprofit organization with the funds to dedicate a park in a more appropriate location than the project site, which is industrially zoned and isolated to the west and east by major rail lines. The City Council accordingly determined that establishment of an active use park on the property is inappropriate due to the property's location in an industrial corridor, and

authorized execution of a Cash Pledge Agreement whereby a payment in the amount of $3,573,365 was made to improve and provide recreational and park facilities at more suitable alternate sites in the vicinity of the property (see Report of the Chief Legislative Analyst, Ordinance No. 181949, and City Council Motion included in Appendix XII of the Draft EIR). The value of the cash pledge was determined on the basis of the pro rata value of the 2.6 acres to be set aside for recreational purposes pursuant to the settlement agreement relative to the overall purchase price of the project site. For further information on the site background and cash pledge agreement for park and recreational uses, please see pages IV-3 and IV-4 of the Corrections and Additions section of this Final EIR, and pages III-6 and III-7 and Appendix XII of the Draft EIR.

As stated in the Draft EIR and summarized above, the project's cash pledge agreement will contribute to open space in the City in a more suitable location, while the project site would be developed consistent with its Community Plan designation, goals and policies, and the project objectives.

COMMENT NO. E28-4

One of the healing remedies I suggest to people is to get back to nature in our urban jungle. Walk in the park, listen to the birds, sit by a tree, put your hands in the soil. Gardening is a very healthy way to heal the self, and to grow food for yourself and your community. Life is about choices and more people are seeking a path towards holistic living which includes contributing to your own food supply. Community gardens are beautiful, serene and empowering ways for communities to live and play together while producing with natures assistance a fuel for our bodies, hearts and souls. It makes me wonder how many of your staff actually spend time engaged with nature and the environment? For report seems to show a level of ignorance and promotes neglect that is not a path to wholeness.

RESPONSE NO. E28-4

Your comment on the proposed project and the health benefits of gardening has been noted. Your concerns will be taken into consideration by the decision-makers prior to taking action on the proposed project.

COMMENT NO. E28-5

Please re-do this DEIR to take into consideration the abundant community values in using this land for gardening and recreation. Please take time to get outdoors and commune with nature.

RESPONSE NO. E28-5

Your comment on the proposed project regarding a gardening/recreation alternative has been noted. Your concerns will be taken into consideration by the decision-makers prior to taking action on the proposed project. As discussed in Response to Comment No. E28-2 above, the alternatives for a community garden or park/recreation use were withdrawn from further analysis as they would not meet the basic objectives of the project. In order to satisfy the City's requirement for recreational use for the community, the City adopted Ordinance No. 181949 on November 23, 2011,[41] whereby funds were contributed to park/recreational development at more suitable alternative sites. As stated in the Draft EIR and summarized above, the project's cash pledge agreement will contribute to open space in the City in a more suitable location, while the project site would be developed consistent with its Community Plan designation, goals and policies, and the project objectives.

[41] Ordinance No. 181949, Report of the Chief Legislative Analyst for Council File No. 11-1524, and Motion, dated February 24, 2012.

LETTER NO. E29

Nallely Hernandez

COMMENT NO. E29-1

Hi, my name is Nallely Hernandez. I live by Hooper and Naomi. I have resided in the Los Angeles area for 20 years. I am employed in X-Factory and have been working here a little over 6 months. I was a stay at home mother before I began working so working here has given me so much work experience and so much knowledge. I am constantly growing within my field, garment pre-production/production. Our employer, mister Tony Yu has always been so attentive towards us, his employees. Our work environment always feels safe and we as a company are constantly striving for better. We take pride in the garments produced as we work hard to make sure every detail of the garment is perfect. I enjoy working here because I always receive the best support from my colleagues if I have a family emergency. I am so happy that I am able to provide for my 2 children.

RESPONSE NO. E29-1

Your comment on the proposed project has been noted. Your concerns will be taken into consideration by the decision-makers prior to taking action on the proposed project.

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LETTER NO. E30

Norma Hernandez

COMMENT NO. E30-1

Hello, my name is Norma Hernandez. I've lived at 9324 Juniper St., Los Angeles, CA for 17 years. I am very grateful to God and my boss for working at IMPACT. It has been a year since I've had the opportunity of being part of IMPACT as a garment inspector (trimming). Thanks to this job, it has been a great benefit to my family and children. I am willing to improve my performance each day. I am proud to see our garments on TV because it makes me feel part of the IMPACT team. I hope that IMPACT will grow and be more productive in the future, providing more work every day.

RESPONSE NO. E30-1

Your comment on the proposed project has been noted. Your concerns will be taken into consideration by the decision-makers prior to taking action on the proposed project.

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LETTER NO. E31

Salvador E. Hernandez

COMMENT NO. E31-1

I live on Hooper Street of Los Angeles. I have lived in Los Angeles since 2006. I've been working at Poetry since May 2006. I am currently in the shipping department. With this job, I have been able to support my family. It has helped me become a better member of my family.

Working at Poetry has been a great experience. Poetry's working environment is professional and very great. I look forward to working with my co-workers every day. We get through the good times and bad times together, while always looking to help each other towards success. The product that our company sells brings happiness to many people around the world. By providing great merchandise, we give people opportunities for their business while providing people what they want. We help support, by giving jobs, not only here in Los Angeles, but also in China. I am happy to say Poetry is a great company.

RESPONSE NO. E31-1

Your comment on the proposed project has been noted. Your concerns will be taken into consideration by the decision-makers prior to taking action on the proposed project.

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LETTER NO. E32

Fausto Herrera

COMMENT NO. E32-1

Hello, I am Fausto Herrera. I have worked at IMPACT for 25 years. I know my boss very well and he is a very good boss. He has much work for us and gives us over time. I am very happy with my work and get along well with my coworkers. I don't like to have problems at work. Thanks to my boss for being such a good person, there are few.

RESPONSE NO. E32-1

Your comment on the proposed project has been noted. Your concerns will be taken into consideration by the decision makers prior to taking action on the proposed project.

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LETTER NO. E33

Karen Iglesias

COMMENT NO. E33-1

I live in Eastlake Ave Los Angeles, I've lived in Los Angeles for about 8 years. I've been working at Impact since August 2008, I started here as a receptionist, then I was promoted to pre-production assistant now I'm production manager assistant, along with the knowledge my compensation has grown, I've been able to afford a better living and help my family too. Work for Impact is a great experience, I consider my coworkers and boss as my second family, we celebrate success and birthdays with happiness and share great moments. I'm so proud to work at Impact and when I realize that is when I see on TV Shows some products of our clients that we have made here.

RESPONSE NO. E33-1

Your comment on the proposed project has been noted. Your concerns will be taken into consideration by the decision-makers prior to taking action on the proposed project.

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LETTER NO. E34

Arcadio Jacinto

COMMENT NO. E34-1

My name is Arcadio Jacinto. I'd like to talk about my work and my boss. I am a garment maker. Although I have not been with the company long, the truth is, I am very happy with my boss. He is responsible, he enjoys camaraderie and above all he is a good person. He has not failed us and provides work. I wish to thank him for all this.

RESPONSE NO. E34-1

Your comment on the proposed project has been noted. Your concerns will be taken into consideration by the decision-makers prior to taking action on the proposed project.

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LETTER NO. E35

David Jo

COMMENT NO. E35-1

I live on Westmoreland Avenue of Los Angeles. I have lived in Los Angeles for all my life. I've been working at Poetry since February 2014. I am currently in the sales department. I do multiple things for my job: sales, shipping company PO's, invoices, and also packing merchandise. With this job, I have been able to support my family. It has helped me become a better member of my family.

Working at Poetry has been a great experience. Poetry's working environment is professional and very great. I look forward to working with my co-workers every day. We get through the good times and bad times together, while always looking to help each other towards success. The product that our company sells brings happiness to many people around the world. By providing great merchandise, we give people opportunities for their business while providing people what they want. We help support, by giving jobs, not only here in Los Angeles, but also in China. I am happy to say Poetry is a great company.

RESPONSE NO. E35-1

Your comment on the proposed project has been noted. Your concerns will be taken into consideration by the decision makers prior to taking action on the proposed project.

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LETTER NO. E36

Kathy Knight

COMMENT NO. E36-1

Please do not accept the Draft EIR in its current form. It goes against the Open Space element in the City's master plan by opting against preservation and restoration of green open space in favor of more industrial uses. The highest use of this parcel would be to return it to the community as an urban garden with recreational opportunities.

RESPONSE NO. E36-1

Your comments regarding the consistency of the project with the City's General Plan Open Space Element, and regarding the community value of gardens have been noted. Section 15126.6 of the CEQA Guidelines requires an EIR to describe a range of reasonable alternatives to a project or to the location of a project that would feasibly attain most of the basic objectives of a project but would avoid or substantially lessen any of the significant effects of a project, and evaluate the comparative merits of the alternatives. The discussion of alternatives, however, need not be exhaustive, but rather the discussion must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. An EIR is not required to consider alternatives that are deemed "infeasible." In developing alternatives, the following factors are considered: (i) ability to meet most of the basic project objectives, (ii) feasibility, or (iii) ability to avoid or substantially lessen significant environmental impacts.

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- A community garden or park would not attain the objective of providing a minimum of 480,000 square feet of light industrial space, consistent with the existing land use designation and zoning.

- A community garden or park would not provide light manufacturing jobs within 3 miles of an existing garment manufacturing labor force in the Southeast Los Angeles Community Plan Area.

- A community garden or park would not allow for development of an industrial park that is along the Alameda Corridor to take advantage of distribution efficiency opportunities.

- A community garden or park would not facilitate the ability of existing garment labor force, located in close proximity to the project site to utilize existing public transit system and other multi-modal transportation opportunities in vicinity of proposed project.

- A community garden or park would not preserve and/or redevelop the industrial sector of the Southeast Los Angeles Community Plan Area to accommodate emerging technologies, thus providing an enhanced employment base for the Community Plan Area's population.

- A community garden or park would not benefit the Southeast Los Angeles Community Plan area population as economic stimulation through employment opportunities, attracting commercial and industrial tenants to the area, and providing tax revenue for the City would not occur.

The proposed use of the property as light manufacturing is consistent with land use planning objectives articulated in the Southeast Los Angeles Community Plan. The City of Los Angeles Southeast Los Angeles Community Plan has designated the project site as light industrial. The land use designation discourages nonindustrial uses and uses that compromise job-producing potential. Plan Goal 3 supports sufficient land for a variety of industrial uses with maximum employment opportunities, which are safe for the environment and the work force, and which have minimal adverse impacts on adjacent uses. The South East Los Angeles Community Plan further supports the retention and redevelopment of the industrial sector through Objective 3-1, Policy 3-1.1, and Objective 3-2, Policy 3-2.1:

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>
> **Policies 3-2.1** The significant, large industrially planned parcels located in predominantly industrial areas associated with the railroad transportation facilities along Alameda and in the Slauson area should be protected from development by other uses which do not support the industrial base of the community, and the City.

The Southeast Los Angeles Community Plan's open space goals and objectives support the preservation of existing open space and the development of new open space, in balance with new development, to serve the recreational, environmental, health and safety needs of the community. The objectives further note that the "Plan Map designates lands for open spaces including parklands." As noted above, the project site is in an industrial corridor adjacent to the Alameda Corridor rail line, and it is not designated for open space on the plan map. The area surrounding the proposed project site is developed almost exclusively with light and heavy industrial uses, with limited small lot single family residential homes intermixed with light/industrial warehouse uses to the south and residential areas farther to the west. The Alameda Corridor rail line is located directly to the east and runs below grade in the project area, and also includes the Southern Pacific Railroad right-of-way across South Alameda Street. The Metro Blue Line light rail is located immediately to the west of the project site. The nearest designated open space is the Ross Snyder Recreation Center, located 0.2 mile west of the proposed project site.

The applicant acknowledges the former interim use of the project site as a community garden that occurred under previous ownership. However, the use was discontinued in 2006, and the project site is currently vacant underutilized land in an industrially zoned area. Appendix XII and Section III.E of the Draft EIR provide details of a 2003 settlement agreement between the prior owner and the City of Los Angeles to dedicate 2.6 acres of the property for maintenance of a park for recreation and park purposes, and subsequent amendment of the agreement to allow the proposed project to be developed. This amendment for the cash pledge provided the City or a nonprofit organization with the funds to dedicate a park in a more appropriate location than the project site, which is industrially zoned and isolated to the

west and east by major rail lines. The City Council accordingly determined that establishment of an active use park on the property is inappropriate due to the property's location in an industrial corridor, and authorized execution of a Cash Pledge Agreement whereby a payment in the amount of $3,573,365 was made to improve and provide recreational and park facilities at more suitable alternate sites in the vicinity of the property (see Report of the Chief Legislative Analyst, Ordinance No. 181949, and City Council Motion included in Appendix XII of the Draft EIR). The value of the cash pledge was determined on the basis of the pro rata value of the 2.6 acres to be set aside for recreational purposes pursuant to the settlement agreement relative to the overall purchase price of the project site. For further information on the site background and cash pledge agreement for park and recreational uses, please see pages IV-3 and IV-4 of Section IV, *Corrections and Additions to the Draft EIR* section of this Final EIR, and pages III-6 and III-7 and Appendix XII of the Draft EIR.

The Open Space Element consists primarily of general aspirational citywide policies and programs encouraging the provision of open space. The commenter has not specified in what way the project would be inconsistent with this General Plan Element. However, the project would be consistent with the South East Los Angeles Community Plan goals, objectives and land use designation as specified above in this Response to Comment No. E36-1, and further would contribute to open space amenities nearby, and, as such is considered substantially consistent with the general intent of the Open Space Element. As stated in the Draft EIR and summarized above, the project's cash pledge agreement will contribute to open space in the City in a more suitable location, while the project site would be developed consistent with its community plan designation, goals and policies, and the project objectives. As a result, the project is consistent with the Open Space Element.

COMMENT NO. E36-2

The DEIR's conclusion that community gardens do not carry local community value and economic benefits is insensitive to communities of color. For the people of South LA, access to healthy food – broccoli, asparagus, tomatoes (as opposed to chips, sodas, and candy), as well as skills to produce this food -- are matters of life and death, of sight and blindness.

RESPONSE NO. E36-2

Your comment regarding sensitivity to communities of color, the local benefit and value of community gardens, and access to healthy food has been noted. Your concerns will be taken into consideration by the decision-makers prior to taking action on the proposed project.

As discussed in Response to Comment No. E36-1, above, the alternatives for a community garden or park/recreation use were withdrawn from further analysis as they would not meet the basic objectives of the project. The City entered into a cash pledge agreement with the prior owner to dedicate 2.6 acres of the property for maintenance of a park for recreation and park purposes, and subsequent amendment of the agreement to allow the proposed project to be developed. This amendment for the cash pledge provided the City or a nonprofit organization with the funds to dedicate a park in an alternative site more suitable for the community's agricultural use and park/recreational development functions. In order to satisfy the City's requirement for recreational use for the community, the City adopted Ordinance No. 181949 on November 23, 2011,[42] whereby funds were contributed to park/recreational development at more suitable alternative sites. As stated in the Draft EIR and summarized above, the project's cash pledge agreement will contribute to open space in the City in a more suitable location, while the project site would be developed consistent with its Community Plan designation, goals and policies, and the

[42] Ordinance No. 181949, Report of the Chief Legislative Analyst for Council File No. 11-1524, and Motion, dated February 24, 2012.

project objectives.

COMMENT NO. E36-3

Also, we spend a huge amount of tax funds on jails in Los Angeles. But it has been shown that when children can grow food in community gardens with their families, they eat better and the crime rate goes down. It is a healthy activity for families to do together. Where is the impact of this shown in the DEIR?

RESPONSE NO. E36-3

Your comment regarding the allocation of tax funds, the crime rate, and the benefits of community gardens has been noted. CEQA centers on whether a project may have a significant effect on the physical environment. These topics are beyond the scope of this document. Your concerns will be taken into consideration by the decision-makers prior to taking action on the proposed project.

COMMENT NO. E36-4

In addition, the DEIR needs to study in detail the health and mental benefits of children in that area having open space to enjoy for recreation.

RESPONSE NO. E36-4

Your comment regarding the health and mental benefits to children from open space and recreation has been noted. As discussed in Response to Comment No. E36-1, above, the alternatives for a community garden or park/recreation use were withdrawn from further analysis as they would not meet the basic objectives of the project. The City entered into a cash pledge agreement with the prior owner to dedicate 2.6 acres of the property for maintenance of a park for recreation and park purposes, and subsequent amendment of the agreement to allow the proposed project to be developed. This amendment for the cash pledge provided the City or a nonprofit organization with the funds to dedicate a park in an alternative site more suitable for the community's agricultural use and park/recreational development functions. In order to satisfy the City's requirement for recreational use for the community, the City adopted Ordinance No. 181949 on November 23, 2011,[43] whereby funds were contributed to park/recreational development at more suitable alternative sites. As stated in the Draft EIR and summarized above, the project's cash pledge agreement will contribute to open space in the City in a more suitable location, while the project site would be developed consistent with its Community Plan designation, goals and policies, and the project objectives. Your concerns will be taken into consideration by the decision-makers prior to taking action on the proposed project.

COMMENT NO. E36-5

Please re-do this DEIR to take into consideration the abundant community values in using this land for gardening and recreation.

RESPONSE NO. E36-5

Your comment on the proposed project has been noted. As discussed in Response to Comment No. E36-1, above, the alternatives for a community garden or park/recreation use were withdrawn from further analysis as they would not meet the basic objectives of the project. The City entered into a cash pledge

[43] Ordinance No. 181949, Report of the Chief Legislative Analyst for Council File No. 11-1524, and Motion, dated February 24, 2012.

agreement with the prior owner to dedicate 2.6 acres of the property for maintenance of a park for recreation and park purposes, and subsequent amendment of the agreement to allow the proposed project to be developed. This amendment for the cash pledge provided the City or a nonprofit organization with the funds to dedicate a park in an alternative site more suitable for the community's agricultural use and park/recreational development functions. In order to satisfy the City's requirement for recreational use for the community, the City adopted Ordinance No. 181949 on November 23, 2011,[44] whereby funds were contributed to park/recreational development at more suitable alternative sites. As stated in the Draft EIR and summarized above, the project's cash pledge agreement will contribute to open space in the City in a more suitable location, while the project site would be developed consistent with its Community Plan designation, goals and policies, and the project objectives. Your concerns will be taken into consideration by the decision-makers prior to taking action on the proposed project.

[44] Ordinance No. 181949, Report of the Chief Legislative Analyst for Council File No. 11-1524, and Motion, dated February 24, 2012.

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LETTER NO. E37

Bryan Lee

COMMENT NO. E37-1

I live on Georgia Street of Los Angeles. I have lived in Los Angeles all my life. I've been working at Poetry since September 2008. I am currently in the sales department. I do multiple things for my job: sales, shipping company POs, invoices and also packing merchandise. With this job, I have been able to support my family. It has helped me become a better member of my family.

Working at Poetry has been a great experience. Poetry's working environment is professional and very great. I look forward to working with my co-workers every day. We get through the good times and bad times together, while always looking to help each other towards success. The product that our company sells brings happiness to many people around the world. By providing great merchandise, we give people opportunities for their business while providing people what they want. We help support, by giving jobs, not only here in Los Angeles, but also in China. I am happy to say Poetry is a great company.

RESPONSE NO. E37-1

Your comment on the proposed project has been noted. Your concerns will be taken into consideration by the decision makers prior to taking action on the proposed project.

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LETTER NO. E38

Carlos Lopez

COMMENT NO. E38-1

My name is Carlos Lopez. I have been working approximately 5 years here at IMPACT and I think we do good quality work. Until this moment, I feel good about working here and think it provides a good work environment.

From my experience in this line of work, it is one of the best I've found. I hope to continue for a long time and hope that the company continues to grow.

RESPONSE NO. E38-1

Your comment on the proposed project has been noted. Your concerns will be taken into consideration by the decision makers prior to taking action on the proposed project.

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LETTER NO. E39

Jose Lopez

COMMENT NO. E39-1

South LA Sweatshops will have long term detrimental health impact to the residents of South Central Los Angeles

The City Planning Department has announced its intention to allow 4 warehouses to be built with a substandard Draft Environmental Impact Report (Case Number: ENV-2012-920-EIR, AA-2012-919-PMLA, DIR-2013-887-SPR), a move Farm representatives and the community say will have long term detrimental health impacts for local South LA residents. Plans call for 4 warehouse facilities that will draw some 75 diesel big rigs into the area every day, creating an intolerable concentration of diesel fumes and particulate matter in a neighborhood in a warehousing district already saturated with such exhaust, posing the danger of increased risks of cancer, emphysema, asthma, and increased hospitalizations to poor people of color who live in the district. South Central Farm representative Tezozomoc said, "This is an unmistakable and undeniable threat to the health and well being of the people who live here, and that the City Planning Department has accepted a substandard Draft Environmental Impact Report on behalf of PIMA is a clear cut example of environmental racism." I call on the city, " to unconditionally reject the DEIR and return the land to the community to anchor an environmental justice project to begin to clean up the community".

RESPONSE NO. E39-1

Your comment in regard to the health risks from the diesel truck trips generated by the proposed project has been noted. The construction phase air quality impact analysis can be found in the Impact Analysis portion of Section IV.B *Air Quality* of the Draft EIR. Construction related toxic air contaminants (TACs) from diesel particulate emissions will be short-lived (3 months), and therefore do not require a Health Risk Assessment (HRA) from the Office of Environmental Health Hazard Assessment (OEHHA). Diesel particulate emissions only affect the population on a long-term (70-year) basis for cancer impacts, so the impact of short-term TACs from the construction of the proposed project is considered less than significant, as analyzed in Section IV.B (pages IV.B-15 through -18) of the Draft EIR. Construction emissions were analyzed for the six main criteria air pollutants as evident in Table IV.B-8. Emissions from VOCs, NOx, CO, SOx, and $PM_{2.5}$ were calculated to be below the SCAQMD significance threshold. PM_{10}, does have a significant impact during the construction phase, but it can be reduced to below the level of significance with mitigation measures.

For the operations of the proposed project, Section IV.G, *Transportation/Traffic* of the Draft EIR considered 351 truck trips/day based on Institute of Transportation Engineers guidelines. Of the 351, EMFAC 2011, an emissions factor model, estimates that on average 9 percent of the total trucks are diesel fueled trucks for an estimate of 31 diesel fueled trucks, as mentioned in the Human Health Risk Analysis portion of Section IV.B *Air Quality* of the Draft EIR. Because the total daily truck trips are greater than 100, a refined Health Risk Assessment for operational impacts was conducted that identified sensitive receptors and individual cancer risk. Diesel particulate is the majority of health risk among the TACs emitted from both diesel- and gasoline-fueled vehicles, so only diesel particulate emissions are considered for the Health Risk Assessment. As described in Section IV.B (page IV.B-22) of the Draft EIR, the resulting maximum potential cancer risk is 0.3 in a million, which is only 3 percent of the cancer risk threshold of 10 in a million as set by the South Coast Air Quality Management District Rule 1401. In addition to the cancer risk, operational emissions associated with the proposed project for the six main criteria air pollutants are quantified in Table IV.B-9, *Unmitigated Estimated Daily Operational*

Emissions, of the Draft EIR, and were found to be below thresholds of significance established by SCAQMD. Therefore, the proposed project would not result in significant human health risks related to diesel emissions. Further details on the air quality impacts analysis in the operational phase can be found in pages IV.B-18 to B-22 of the Draft EIR.

With Alternative C, Reduced Truck Operations, truck trips would be limited to 75 truck trips per day. As a result, the maximum cancer risk drops to 0.6 percent of the allowable threshold. The alternatives with clean fuel trucks and reduced truck operations would result in fewer diesel emissions.

CEQA centers on whether a project may have a significant effect on the physical environment (CEQA Guidelines, 15064(d)). The purpose of an environmental impact report is to identify the significant effects on the environment of a project, to identify alternatives to the project, and to indicate the manner in which those significant effects can be mitigated or avoided (Pub. Res. Code, §21002.1 subd. (a)). Environmental justice is not considered an area of impact under CEQA, and CEQA does not ask that a project mitigate preexisting conditions. As noted in CEQA Guidelines Section 15064(b), the significance of an activity may vary with the environmental setting. Where there already is a high pollution burden on a community, the relevant question is whether an additional amount of pollution should be considered significant in light of the serious nature of the existing problem.[45]

The Existing Conditions section in Section IV.B *Air Quality* of the Draft EIR includes ambient air quality data gathered from the local air quality monitoring stations. The average concentrations and days above the standard for each criteria air pollutant are listed in Table IV.B-6 *Summary of 2010-2012 Ambient Air Quality Data in the Proposed Project Vicinity* on page IV.B-11 of the Draft EIR. The Air Quality impact analysis relative to the impacts of the proposed project has been further detailed above in this Response to Comment No. E39-1, and is located in Section IV.B *Air Quality* of the Draft EIR. In the Draft EIR, sensitive receptors are defined on page IV.B-11. There are two maps showing their locations: Figure IV.B-1 *Sensitive Receptors* and Figure IV. B-2 *Receptor Grid and Sensitive Receptors*.

COMMENT NO. E39-2

It is clear that Los Angeles City has failed the residents of South LA by considering a substandard DEIR. In 2008 the City of Los Angeles reviewed a project submitted by Horowitz to do one warehouse that encompassed 437,196 sq. ft. (see Case No. ENV-2008-799-MND, VTT-61482, DIR-2008-841-SPR, aka 41st and Alameda Warehouse Project) and at that time there would be 264 truck trips per day. In the recent DEIR PIMA will be developing 481,022 sq. ft. of warehouse space; comprised of 4 buildings and over 2000 car trips per day. In PIMA's proposal they claim a mere 75 trip trucks a day. There is a difference of 189 truck trips per days for a warehouse space that is 10% larger. There is a difference of 70% in truck trips. What is problematic with this assumption is that all further analysis will be based on the underspecified 75 truck trips per day. While this under estimation of the truck trips may get the project approved by the City; the city under Jan Perry has supported this project, it will have long negative impact on the residents of South Los Angeles. In the realm of Air Quality Health Risk Assessment the truck trips are further down estimated to 31 diesel fueled trucks per day. The Kleinfelder's Health Risk Analysis is faulty because it also assumes a degraded amount of truck trips per day; 75 truck trips per day.

[45] Harris, Kamala D. 10 July 2012. *Environmental Justice at the Local and Regional Level: Legal Background*. Prepared by State of California Department of Justice. Available at: http://oag.ca.gov/sites/all/files/agweb/pdfs/environment/ej_fact_sheet.pdf

RESPONSE NO. E39-2

The City of Los Angeles has noted the concern about the discrepancy in the number of truck trips and the resulting health risks. A total of 351 truck trips is assumed in the Air Quality Health Risk Assessment (Appendix V in Volume IV of the Draft EIR) and Section IV.B, *Air Quality*, of the Draft EIR based on the Addendum to the Traffic Impact Study (Appendix IX in Volume VI of the Draft EIR). Of the 351 truck trips, EMFAC 2011 estimates that on average 9 percent of the total trucks are diesel fueled trucks for an estimate of 31 diesel-fueled trucks as mentioned in the Human Health Risk Analysis portion of Section IV.B *Air Quality* of the Draft EIR.

The Draft EIR states on page IV.G-13 that

> *It is calculated that the proposed project will generate approximately 1,966 net passenger car equivalent (PCE) trips per average day. The average weekday net new peak hour PCE trips will be approximately 179 trips during the a.m. peak hour and 190 trips during the p.m. peak hours (Figure IV.G-6, Distribution of Project Traffic, and Figure IV.G-7, Existing [2014] plus Project Traffic Volumes). The traffic analysis also considered the distribution of trips during a.m. and p.m. peak hours in the vicinity of the proposed project (Figure IV.G- 8, Project Traffic at Driveways and Adjacent Intersections).*
>
> *While these estimates were developed based on the ITE's Trip Generation Manual, the project applicant has indicated that truck trips associated with operation of the proposed project would not exceed 75 daily truck trips, which has therefore been analyzed as Alternative C in this Draft EIR (see Attachment E to the Initial Study, which is Appendix III of this Draft EIR).*

The 75 truck trips identified in Alternative C stem from the existing operations at various facilities, which will be consolidated in the proposed project. Currently, there is a maximum of 33 truck trips/day total for the various facilities. The proposed project build out is not expected to significantly increase this number of trips; hence, 75 daily truck trips were taken as the assumption in Alternative C of the Draft EIR.

COMMENT NO. E39-3

Regional Air Quality

The air quality in Southern California does not meet the state and federal standards. The American Lung Association consistently gives Los Angeles County failing grades in the amount of ozone and particulate pollution in the air. Although smog levels are impacted by seasons and weather patterns, smog is visible in the air on most days.

RESPONSE NO. E39-3

The City of Los Angeles has noted the comment about poor air quality in the region as defined by the American Lung Association. The American Lung Association gives an "F" rating for ozone, particulate pollution (24-hour), and particulate pollution (annual) for Los Angeles County. In regard to the California Ambient Air Quality Standards, Los Angeles County has also been designated nonattainment for ozone, PM_{10}, $PM_{2.5}$, nitrogen dioxide, and lead. The Draft EIR evaluates the proposed project with respect to the State CEQA Guidelines. Construction and operations emissions were modeled and compared to the South Coast Air Quality Management District (SCAQMD) Significance Thresholds. Only the PM_{10} construction emissions were found to exceed the SCAQMD significance threshold by 5.6 lbs/day. Mitigation measures are described in the Draft EIR on page IV.B-23 and IV.B-24, which reduce air quality impacts below the threshold of significance. All other criteria pollutants are expected to be below the SCAQMD significance

thresholds for both construction and operation phases. The proposed project is expected to be consistent with the regional 2012 Air Quality Management Plan. Please see pages IV.B-16, IV.B-17, and IV.B-19 of the Draft EIR for further information regarding the proposed project's consistency with state and regional air quality plans.

LETTER NO. E40

Marie Lorenzo

COMMENT NO. E40-1

Hello my name is Maria Lorenzo. I have lived in Los Angeles, CA for 20 years. I work for IMPACT and I perform inspections. I have worked 5 years with this company. My boss is very friendly towards us and I like the way he treats us. I feel very happy working here.

RESPONSE NO. E40-1

Your comment on the proposed project has been noted. Your concerns will be taken into consideration by the decision makers prior to taking action on the proposed project.

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LETTER NO. E41

Adulfo Marin

COMMENT NO. E41-1

Adulfo Marin
I've worked for IMPACT since September 2012 and I've lived in Los Angeles, CA since 1997. Toni is the best boss I've ever had. I get paid very well and he treats us very well. He gives us three breaks and everything is good.

RESPONSE NO. E41-1

Your comment on the proposed project has been noted. Your concerns will be taken into consideration by the decision-makers prior to taking action on the proposed project.

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LETTER NO. E42

Juliana Martinez

COMMENT NO. E42-1

Juliana Martinez
I've lived in Los Angeles, CA for 20 years. I've worked for the company for 5 years. I am happy working for this company. I have had work.

RESPONSE NO. E42-1

Your comment on the proposed project has been noted. Your concerns will be taken into consideration by the decision makers prior to taking action on the proposed project.

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LETTER NO. E43

Mario Montano

COMMENT NO. E43-1

South LA Sweatshops will have long term detrimental health impact to the residents of South Central Los Angeles

The City Planning Department has announced its intention to allow 4 warehouses to be built with a substandard Draft Environmental Impact Report (Case Number: ENV-2012-920-EIR, AA-2012-919-PMLA, DIR-2013-887-SPR), a move Farm representatives and the community say will have long term detrimental health impacts for local South LA residents. Plans call for 4 warehouse facilities that will draw some 75 diesel big rigs into the area every day, creating an intolerable concentration of diesel fumes and particulate matter in a neighborhood in a warehousing district already saturated with such exhaust, posing the danger of increased risks of cancer, emphysema, asthma, and increased hospitalizations to poor people of color who live in the district. South Central Farm representative Tezozomoc said, "This is an unmistakable and undeniable threat to the health and well being of the people who live here, and that the City Planning Department has accepted a substandard Draft Environmental Impact Report on behalf of PIMA is a clear cut example of environmental racism." I call on the city, " to unconditionally reject the DEIR and return the land to the community to anchor an environmental justice project to begin to clean up the community".

RESPONSE NO. E43-1

Your comment in regard to the health risks from the diesel truck trips generated by the proposed project has been noted. The construction phase air quality impact analysis can be found in the Impact Analysis portion of Section IV.B *Air Quality* of the Draft EIR. Construction related toxic air contaminants (TACs) from diesel particulate emissions will be short-lived (3 months), and therefore do not require a Health Risk Assessment (HRA) from the Office of Environmental Health Hazard Assessment (OEHHA). Diesel particulate emissions only affect the population on a long-term (70-year) basis for cancer impacts, so the impact of short-term TACs from the construction of the proposed project is considered less than significant, as analyzed in Section IV.B (pages IV.B-15 through -18) of the Draft EIR. Construction emissions were analyzed for the six main criteria air pollutants as evident in Table IV.B-8. Emissions from VOCs, NOx, CO, SOx, and $PM_{2.5}$ were calculated to be below the SCAQMD significance threshold. PM_{10}, does have a significant impact during the construction phase, but it can be reduced to below the level of significance with mitigation measures.

For the operations of the proposed project, Section IV.G, *Transportation/Traffic* of the Draft EIR considered 351 truck trips/day based on Institute of Transportation Engineers guidelines. Of the 351, EMFAC 2011, an emissions factor model, estimates that on average 9 percent of the total trucks are diesel fueled trucks for an estimate of 31 diesel fueled trucks, as mentioned in the Human Health Risk Analysis portion of Section IV.B *Air Quality* of the Draft EIR. Because the total daily truck trips are greater than 100, a refined Health Risk Assessment for operational impacts was conducted that identified sensitive receptors and individual cancer risk. Diesel particulate is the majority of health risk among the TACs emitted from both diesel- and gasoline-fueled vehicles, so only diesel particulate emissions are considered for the Health Risk Assessment. As described in Section IV.B (page IV.B-22) of the Draft EIR, the resulting maximum potential cancer risk is 0.3 in a million, which is only 3 percent of the cancer risk threshold of 10 in a million as set by the South Coast Air Quality Management District Rule 1401. In addition to the cancer risk, operational emissions associated with the proposed project for the six main criteria air pollutants are quantified in Table IV.B-9, *Unmitigated Estimated Daily Operational*

Emissions, of the Draft EIR, and were found to be below thresholds of significance established by SCAQMD. Therefore, the proposed project would not result in significant human health risks related to diesel emissions. Further details on the air quality impacts analysis in the operational phase can be found in pages IV.B-18 to B-22 of the Draft EIR.

With Alternative C, Reduced Truck Operations, truck trips would be limited to 75 truck trips per day. As a result, the maximum cancer risk drops to 0.6 percent of the allowable threshold. The alternatives with clean fuel trucks and reduced truck operations would result in fewer diesel emissions.

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COMMENT NO. E43-2

It is clear that Los Angeles City has failed the residents of South LA by considering a substandard DEIR. In 2008 the City of Los Angeles reviewed a project submitted by Horowitz to do one warehouse that encompassed 437,196 sq. ft. (see Case No. ENV-2008-799-MND, VTT-61482, DIR-2008-841-SPR, aka 41st and Alameda Warehouse Project) and at that time there would be 264 truck trips per day. In the recent DEIR PIMA will be developing 481,022 sq. ft. of warehouse space; comprised of 4 buildings and over 2000 car trips per day. In PIMA's proposal they claim a mere 75 trip trucks a day. There is a difference of 189 truck trips per days for a warehouse space that is 10% larger. There is a difference of 70% in truck trips. What is problematic with this assumption is that all further analysis will be based on the underspecified 75 truck trips per day. While this under estimation of the truck trips may get the project approved by the City; the city under Jan Perry has supported this project, it will have long negative impact on the residents of South Los Angeles. In the realm of Air Quality Health Risk Assessment the truck trips are further down estimated to 31 diesel fueled trucks per day. The Kleinfelder's Health Risk Analysis is faulty because it also assumes a degraded amount of truck trips per day; 75 truck trips per day.

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RESPONSE NO. E43-2

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The Draft EIR states on page IV.G-13 that

> *It is calculated that the proposed project will generate approximately 1,966 net passenger car equivalent (PCE) trips per average day. The average weekday net new peak hour PCE trips will be approximately 179 trips during the a.m. peak hour and 190 trips during the p.m. peak hours (Figure IV.G-6, Distribution of Project Traffic, and Figure IV.G-7, Existing [2014] plus Project Traffic Volumes). The traffic analysis also considered the distribution of trips during a.m. and p.m. peak hours in the vicinity of the proposed project (Figure IV.G- 8, Project Traffic at Driveways and Adjacent Intersections).*
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> *While these estimates were developed based on the ITE's Trip Generation Manual, the project applicant has indicated that truck trips associated with operation of the proposed project would not exceed 75 daily truck trips, which has therefore been analyzed as Alternative C in this Draft EIR (see Attachment E to the Initial Study, which is Appendix III of this Draft EIR).*

The 75 truck trips identified in Alternative C stem from the existing operations at various facilities, which will be consolidated in the proposed project. Currently, there is a maximum of 33 truck trips/day total for the various facilities. The proposed project build out is not expected to significantly increase this number of trips; hence, 75 daily truck trips were taken as the assumption in Alternative C of the Draft EIR.

COMMENT NO. E43-3

Regional Air Quality

The air quality in Southern California does not meet the state and federal standards. The American Lung Association consistently gives Los Angeles County failing grades in the amount of ozone and particulate pollution in the air. Although smog levels are impacted by seasons and weather patterns, smog is visible in the air on most days.

RESPONSE NO. E43-3

The City of Los Angeles has noted the comment about poor air quality in the region as defined by the American Lung Association. The American Lung Association gives an "F" rating for ozone, particulate pollution (24-hour), and particulate pollution (annual) for Los Angeles County. In regard to the California Ambient Air Quality Standards, Los Angeles County has also been designated nonattainment for ozone, PM_{10}, $PM_{2.5}$, nitrogen dioxide, and lead. The Draft EIR evaluates the proposed project with respect to the State CEQA Guidelines. Construction and operations emissions were modeled and compared to the South Coast Air Quality Management District (SCAQMD) Significance Thresholds. Only the PM_{10} construction emissions were found to exceed the SCAQMD significance threshold by 5.6 lbs/day. Mitigation measures are described in the Draft EIR on page IV.B-23 and IV.B-24, which reduce air quality impacts below the threshold of significance. All other criteria pollutants are expected to be below the SCAQMD significance

thresholds for both construction and operation phases. The proposed project is expected to be consistent with the regional 2012 Air Quality Management Plan. Please see pages IV.B-16, IV.B-17, and IV.B-19 of the Draft EIR for further information regarding the proposed project's consistency with state and regional air quality plans.

LETTER NO. E44

Leslie Jeanne Morava

COMMENT NO. E44-1

The Draft EIR in its current form for the site @ 41st & Alameda St. goes against the Open Space element in the City's master plan.

Please on the public's behalf, reject it.

It's choosing to go against preservation and restoration of green, open space in favor of industrial uses.

RESPONSE NO. E44-1

Your comment regarding the consistency of the project with the City's General Plan Open Space Element has been noted. Section 15126.6 of the CEQA Guidelines requires an EIR to describe a range of reasonable alternatives to a project or to the location of a project that would feasibly attain most of the basic objectives of a project but would avoid or substantially lessen any of the significant effects of a project, and evaluate the comparative merits of the alternatives. The discussion of alternatives, however, need not be exhaustive, but rather the discussion must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. An EIR is not required to consider alternatives that are deemed "infeasible." In developing alternatives, the following factors are considered: (i) ability to meet most of the basic project objectives, (ii) feasibility, or (iii) ability to avoid or substantially lessen significant environmental impacts.

As set forth in Section VI of the Draft EIR on pages VI-3 to VI-4, the Community Garden alternative and Park and Recreational Use alternative, requested through public comments, considered development of the project for an alternate land use, specifically a community garden or park. However, these alternatives were withdrawn from further analysis, because they do not meet the basic project objectives:

- A community garden or park would not attain the objective of providing a minimum of 480,000 square feet of light industrial space, consistent with the existing land use designation and zoning.
- A community garden or park would not provide light manufacturing jobs within 3 miles of an existing garment manufacturing labor force in the Southeast Los Angeles Community Plan Area.
- A community garden or park would not allow for development of an industrial park that is along the Alameda Corridor to take advantage of distribution efficiency opportunities.
- A community garden or park would not facilitate the ability of existing garment labor force, located in close proximity to the project site to utilize existing public transit system and other multi-modal transportation opportunities in vicinity of proposed project.
- A community garden or park would not preserve and/or redevelop the industrial sector of the Southeast Los Angeles Community Plan Area to accommodate emerging technologies, thus providing an enhanced employment base for the Community Plan Area's population.

- A community garden or park would not benefit the Southeast Los Angeles Community Plan area population as economic stimulation through employment opportunities, attracting commercial and industrial tenants to the area, and providing tax revenue for the City would not occur.

The proposed use of the property as light manufacturing is consistent with land use planning objectives articulated in the Southeast Los Angeles Community Plan. The City of Los Angeles Southeast Los Angeles Community Plan has designated the project site as light industrial. The land use designation discourages nonindustrial uses and uses that compromise job-producing potential. Plan Goal 3 supports sufficient land for a variety of industrial uses with maximum employment opportunities, which are safe for the environment and the work force, and which have minimal adverse impacts on adjacent uses. The South East Los Angeles Community Plan further supports the retention and redevelopment of the industrial sector through Objective 3-1, Policy 3-1.1, and Objective 3-2, Policy 3-2.1:

> **Objective 3-1** To provide for existing and future industrial uses which contribute job opportunities for residents and which minimize environmental and visual impacts to the community.
>
> **Policies 3-1.1** Designate lands for the continuation of existing industry and development of new industrial parks, research and development uses, light manufacturing, and similar uses which provide employment opportunities.
>
> **Objective 3-2** To retain industrial plan designations to maintain the industrial employment base for community residents and to increase it whenever possible.
>
> **Policies 3-2.1** The significant, large industrially planned parcels located in predominantly industrial areas associated with the railroad transportation facilities along Alameda and in the Slauson area should be protected from development by other uses which do not support the industrial base of the community, and the City.

The Southeast Los Angeles Community Plan's open space goals and objectives support the preservation of existing open space and the development of new open space, in balance with new development, to serve the recreational, environmental, health and safety needs of the community. The objectives further note that the "Plan Map designates lands for open spaces including parklands." As noted above, the project site is in an industrial corridor adjacent to the Alameda Corridor rail line, and it is not designated for open space on the plan map. The area surrounding the proposed project site is developed almost exclusively with light and heavy industrial uses, with limited small lot single family residential homes intermixed with light/industrial warehouse uses to the south and residential areas farther to the west. The Alameda Corridor rail line is located directly to the east and runs below grade in the project area, and also includes the Southern Pacific Railroad right-of-way across South Alameda Street. The Metro Blue Line light rail is located immediately to the west of the project site. The nearest designated open space is the Ross Snyder Recreation Center, located 0.2 mile west of the proposed project site.

The applicant acknowledges the former interim use of the project site as a community garden that occurred under previous ownership. However, the use was discontinued in 2006, and the project site is currently vacant underutilized land in an industrially zoned area. Appendix XII and Section III.E of the Draft EIR provide details of a 2003 settlement agreement between the prior owner and the City of Los Angeles to dedicate 2.6 acres of the property for maintenance of a park for recreation and park purposes, and subsequent amendment of the agreement to allow the proposed project to be developed. This amendment for the cash pledge provided the City or a nonprofit organization with the funds to dedicate a

park in a more appropriate location than the project site, which is industrially zoned and isolated to the west and east by major rail lines. The City Council accordingly determined that establishment of an active use park on the property is inappropriate due to the property's location in an industrial corridor, and authorized execution of a Cash Pledge Agreement whereby a payment in the amount of $3,573,365 was made to improve and provide recreational and park facilities at more suitable alternate sites in the vicinity of the property (see Report of the Chief Legislative Analyst, Ordinance No. 181949, and City Council Motion included in Appendix XII of the Draft EIR). The value of the cash pledge was determined on the basis of the pro rata value of the 2.6 acres to be set aside for recreational purposes pursuant to the settlement agreement relative to the overall purchase price of the project site. For further information on the site background and cash pledge agreement for park and recreational uses, please see pages IV-3 and IV-4 of Section IV, *Corrections and Additions to the Draft EIR* of this Final EIR, and pages III-6 and III-7 and Appendix XII of the Draft EIR.

As stated in the Draft EIR and summarized above, the project's cash pledge agreement will contribute to open space in the City in a more suitable location, while the project site would be developed consistent with its Community Plan designation, goals and policies, and the project objectives. The Open Space Element consists primarily of general aspirational citywide policies and programs encouraging the provision of open space. The commenter has not specified in what way the project would be inconsistent with this General Plan Element. However, the project would be consistent with the South East Los Angeles Community Plan goals, objectives and land use designation as specified above in this Response to Comment No. E44-1, and further would contribute to open space amenities nearby, and, as such is considered substantially consistent with the general intent of the Open Space Element.

COMMENT NO. E44-2

The highest use of this parcel would be to return it to the community as an urban garden, with recreational opportunities!

RESPONSE NO. E44-2

Your comment regarding the highest use of the parcel has been noted. Section 15126.6 of the CEQA Guidelines requires an EIR to describe a range of reasonable alternatives to a project or to the location of a project that would feasibly attain most of the basic objectives of a project but would avoid or substantially lessen any of the significant effects of a project, and evaluate the comparative merits of the alternatives. The discussion of alternatives, however, need not be exhaustive, but rather the discussion must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. An EIR is not required to consider alternatives that are deemed "infeasible," In developing alternatives, the following factors are considered: (i) ability to meet most of the basic project objectives, (ii) feasibility, or (iii) ability to avoid or substantially lessen significant environmental impacts.

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- A community garden or park would not attain the objective of providing a minimum of 480,000 square feet of light industrial space, consistent with the existing land use designation and zoning.

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- A community garden or park would not allow for development of an industrial park that is along the Alameda Corridor to take advantage of distribution efficiency opportunities.

- A community garden or park would not facilitate the ability of existing garment labor force, located in close proximity to the project site to utilize existing public transit system and other multi-modal transportation opportunities in vicinity of proposed project.

- A community garden or park would not preserve and/or redevelop the industrial sector of the Southeast Los Angeles Community Plan Area to accommodate emerging technologies, thus providing an enhanced employment base for the Community Plan Area's population.

- A community garden or park would not benefit the Southeast Los Angeles Community Plan area population as economic stimulation through employment opportunities, attracting commercial and industrial tenants to the area, and providing tax revenue for the City would not occur.

The proposed use of the property as light manufacturing is consistent with land use planning objectives articulated in the Southeast Los Angeles Community Plan. The City of Los Angeles Southeast Los Angeles Community Plan has designated the project site as light industrial. The land use designation discourages nonindustrial uses and uses that compromise job-producing potential. Plan Goal 3 supports sufficient land for a variety of industrial uses with maximum employment opportunities, which are safe for the environment and the work force, and which have minimal adverse impacts on adjacent uses. The South East Los Angeles Community Plan further supports the retention and redevelopment of the industrial sector through Objective 3-1, Policy 3-1.1, and Objective 3-2, Policy 3-2.1:

> **Objective 3-1** To provide for existing and future industrial uses which contribute job opportunities for residents and which minimize environmental and visual impacts to the community.
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>
> **Policies 3-2.1** The significant, large industrially planned parcels located in predominantly industrial areas associated with the railroad transportation facilities along Alameda and in the Slauson area should be protected from development by other uses which do not support the industrial base of the community, and the City.

The Southeast Los Angeles Community Plan's open space goals and objectives support the preservation of existing open space and the development of new open space, in balance with new development, to serve the recreational, environmental, health and safety needs of the community. The objectives further note that the "Plan Map designates lands for open spaces including parklands." As noted above, the

project site is in an industrial corridor adjacent to the Alameda Corridor rail line, and it is not designated for open space on the plan map. The area surrounding the proposed project site is developed almost exclusively with light and heavy industrial uses, with limited small lot single family residential homes intermixed with light/industrial warehouse uses to the south and residential areas farther to the west. The Alameda Corridor rail line is located directly to the east and runs below grade in the project area, and also includes the Southern Pacific Railroad right-of-way across South Alameda Street. The Metro Blue Line light rail is located immediately to the west of the project site. The nearest designated open space is the Ross Snyder Recreation Center, located 0.2 mile west of the proposed project site.

The applicant acknowledges the former interim use of the project site as a community garden that occurred under previous ownership. However, the use was discontinued in 2006, and the project site is currently vacant underutilized land in an industrially zoned area. Appendix XII and Section III.E of the Draft EIR provide details of a 2003 settlement agreement between the prior owner and the City of Los Angeles to dedicate 2.6 acres of the property for maintenance of a park for recreation and park purposes, and subsequent amendment of the agreement to allow the proposed project to be developed. This amendment for the cash pledge provided the City or a nonprofit organization with the funds to dedicate a park in a more appropriate location than the project site, which is industrially zoned and isolated to the west and east by major rail lines. The City Council accordingly determined that establishment of an active use park on the property is inappropriate due to the property's location in an industrial corridor, and authorized execution of a Cash Pledge Agreement whereby a payment in the amount of $3,573,365 was made to improve and provide recreational and park facilities at more suitable alternate sites in the vicinity of the property (see Report of the Chief Legislative Analyst, Ordinance No. 181949, and City Council Motion included in Appendix XII of the Draft EIR). The value of the cash pledge was determined on the basis of the pro rata value of the 2.6 acres to be set aside for recreational purposes pursuant to the settlement agreement relative to the overall purchase price of the project site. For further information on the site background and cash pledge agreement for park and recreational uses, please see pages IV-3 and IV-4 of Section IV, *Corrections and Additions to the Draft EIR* of this Final EIR, and pages III-6 and III-7 and Appendix XII of the Draft EIR.

As stated in the Draft EIR and summarized above, the project's cash pledge agreement will contribute to open space in the City in a more suitable location, while the project site would be developed consistent with its Community Plan designation, goals and policies, and the project objectives.

COMMENT NO. E44-3

Cumulative impacts of diesel trucks required for warehouse activity will add to the area's already unacceptable level of air and noise pollution.

RESPONSE NO. E44-3

Your comment regarding air quality and noise impacts has been noted. There are 11 projects expected to be implemented within a 2-mile radius of the proposed project during the construction period of the proposed project. Cumulative impacts to air quality are expected to be below the level of significance with the implementation of Mitigation Measures Air-1 to Air-7, which are listed on pages IV.B-23 and IV.B-24 in the Draft EIR and listed here:

> Air-1
> During the construction phase of the project, the project applicant shall apply soil stabilizers for all unpaved roads (80 percent reduction in PM2.5 and PM10 emissions).

Air-2
During the construction phase of the project, the project applicant shall water exposed areas three times a day (61 percent reduction in PM2.5 and PM10 emissions).

Air-3
During the construction phase of the project, the project applicant shall ensure that vehicular speeds are reduced to 15 miles per hour on unpaved roads.

Air-4
The project applicant shall establish incentives for increased transit frequency- in compliance with the transportation demand management and trip reduction measures set forth in Section 12.26J of the Los Angeles Municipal Code, which include the following requirements for non-residential projects with more than 100,000 square feet of floor area.

(a) Development in excess of 25,000 square feet of gross floor area. The owner shall provide a bulletin board, display case, or kiosk (displaying transportation information) where the greatest number of employees are likely to see it. The transportation information displayed should include, but is not limited to, the following:

(1) Current routes and schedules for public transit serving the site;

(2) Telephone numbers for referrals on transportation information including numbers for the regional ridesharing agency and local transit operations;

(3) Ridesharing promotion material supplied by commuter-oriented organizations;

(4) Regional/local bicycle route and facility information;

(5) A listing of on-site services or facilities which are available for carpoolers, vanpoolers, bicyclists, and transit riders.

(b) Development in excess of 50,000 square feet of gross floor area. The owner shall comply with Paragraph (a) above and in addition shall provide:

(1) A designated parking area for employee carpools and vanpools as close as practical to the main pedestrian entrance(s) of the building(s). This area shall include at least ten percent of the parking spaces required for the site. The spaces shall be signed and striped sufficient to meet the employee demand for such spaces. The carpool/vanpool parking area shall be identified on the driveway and circulation plan upon application for a building permit;

(2) One permanent, clearly identified (signed and striped) carpool/vanpool parking space for the first 50,000 to 100,000 square feet of gross floor area and one additional permanent, clearly identified (signed and striped) carpool/vanpool parking space for any development over 100,000 square feet of gross floor area;

(3) Parking spaces clearly identified (signed and striped) shall be provided in the designated carpool/vanpool parking area at any time during the building's occupancy sufficient to meet employee demand for such spaces. Absent such demand, parking spaces within the designated carpool/vanpool parking area may be used by other vehicles;

(4) No signed and striped parking spaces for carpool/vanpool parking shall displace any handicapped parking;

(5) A statement that preferential carpool/vanpool spaces are available on-site and a description of the method for obtaining permission to use such spaces shall be included on the required transportation information board;

(6) A minimum vertical clearance of 7 feet 2 inches shall be provided for all parking spaces and accessways used by vanpool vehicles when located within a parking structure;

(7) Bicycle parking shall be provided in conformance with Section 12.21A16 of this Code.

(c) Development in excess of 100,000 square feet of gross floor area. The owner shall comply with Paragraphs (a) and (b) above and shall provide:

(1) A safe and convenient area in which carpool/vanpool vehicles may load and unload passengers other than in their assigned parking area;

(2) Sidewalks or other designated pathways following direct and safe routes from the external pedestrian circulation system to each building in the development;

(3) If determined necessary by the City to mitigate the project impact, bus stop improvements shall be provided. The City will consult with the local bus service providers in determining appropriate improvements. When locating bus stops and/or planning building entrances, entrances shall be designed to provide safe and efficient access to nearby transit stations/stops;

(4) Safe and convenient access from the external circulation system to bicycle parking facilities on-site.

Air-5
The project applicant shall improve the pedestrian network for the project site to internally link all uses and connect with existing or planned external streets and pedestrian facilities contiguous with the project site. The project applicant shall identify street trees and streetscape improvements to connect site access points to nearby transit and bicycle facilities.

Air-6
The project applicant shall provide traffic calming measures through street improvements. The applicant will be dedicating additional right-of-way along 41st Street, Alameda Street, and Martin Luther King, Jr. Boulevard. In connection with the street dedications and development of the proposed project, the applicant will be upgrading existing sidewalks, curb and gutter, as well as street trees, street lighting, and street furniture around the entire perimeter of the property in consultation with the City Department of Transportation and Department of Public Works. Upgrades to the existing sidewalks will require new curb cuts and crosswalks and the replacement of existing traffic signals at intersections. Additional traffic control devices will be installed as necessary and required to facilitate safe traffic circulation in and around the proposed project site.

Air-7
The project applicant shall ensure low VOC paint is applied for interior and exterior uses [250 EF (g/L)].

The Existing Conditions section in Section IV.B *Air Quality* of the Draft EIR includes ambient air quality

data gathered from the local air quality monitoring stations. The average concentrations and days above the standard for each criteria air pollutant are listed in Table IV.B-6 *Summary of 2010-2012 Ambient Air Quality Data in the Proposed Project Vicinity* on page IV.B-11 of the Draft EIR. The Air Quality impact analysis relative to the impacts of the proposed project is further detailed below,and is located in Section IV.B *Air Quality* of the Draft EIR. In the Draft EIR, sensitive receptors are defined on page IV.B-11. There are two maps showing their locations: Figure IV.B-1 *Sensitive Receptors* and Figure IV. B-2 *Receptor Grid and Sensitive Receptors*.

Construction emissions are shown in Table IV.B-8, *Unmitigated Estimated Daily Regional Construction Emissions,* and are only significant for PM_{10}. Operational emissions are shown in Table IV.B-9, *Unmitigated Estimated Daily Operational Emissions*, and are not significant for any of the criteria air pollutants. The PM_{10} emissions from construction will be mitigated to below the level of significance with the implementation of the seven mitigation measures.

The primary sources of TAC emissions associated with the proposed project's operations would be limited to DPM from delivery trucks. The results of the TAC analysis are shown in Table IV.B-11, *Summary of DPM Health Impact Results*. As described in Section IV.B (page IV.B-22) of the Draft EIR, the resulting maximum potential cancer risk is 0.3 in a million, which is only 3 percent of the cancer risk threshold of 10 in a million as set by SCAQMD Rule 1401.

Diesel emissions are particularly examined in the Health Risk Assessment (HRA) found in Appendix V in Volume IV of the Draft EIR. The Draft EIR concluded that noise from the proposed project would have a less than significant impact. Please refer to the Initial Study in Appendix III of this Draft EIR, and to Appendix IS-1, Noise Technical Report, for further information. Cumulative air quality impacts are further discussed on pages IV.B-22 and IV.B-23 of the Draft EIR.

COMMENT NO. E44-4

It will also impact pedestrian and automobile safety by increasing traffic congestion adjacent to residential areas and the Metro Blue Line.

RESPONSE NO. E44-4

Your comment addressing traffic congestion and safety has been noted. From the Addendum to the Traffic Impact Study prepared for Sage Strategies in October of 2014 (Appendix IX in Volume VI of Draft EIR),[47] all study intersections would operate at an acceptable LOS (at LOS A through D) with the exception of traffic impacts at the intersection of Alameda Street and East Washington Boulevard during the PM peak hour. A project's traffic impact is determined to be significant if the increase in V/C is 0.04 or more at LOS C, or 0.02 or more at LOS D, or 0.01 or more at LOS E and F.

Significant impacts occur at the intersection Alameda Street and East Washington Boulevard using 351 truck trips per day based on ITE trip generation rates. Section VI *Alternatives* in the Draft EIR examines the following alternatives: Alternative A, No Project Alternative; Alternative B, Use of Clean Fuel Trucks; and Alternative C, Reduced Truck Operations. These alternatives provide ways to reduce the environmental impact of the proposed project. Under Alternative C, the project would not generate traffic at the ITE-recommended rate (i.e., 351 truck trips per day) which is based on surveys conducted nationally at typical warehouse facilities. The project applicant has indicated that truck trips associated with operation of the proposed project would not exceed 75 daily truck trips, which has therefore been analyzed as Alternative C of the Draft EIR. However, significant impacts will still remain at the intersection of Alameda Street and East Washington Boulevard using full ITE trip rates. Currently, there is a maximum of 33 trips/day total for the various existing facilities. The proposed project build out is not expected to significantly increase this number of trips; hence the 75 daily truck trips was taken as the assumption in Alternative C of the Draft EIR. An analysis with this reduced number of truck trips shows that Alternative C will not have a significant impact at any of the study intersections.

Regarding rail crossing and freeway safety, according to the Addendum to the Traffic Impact Study in October 2014 (Appendix IX in Volume VI of the Draft EIR, page 9).

> *The project's traffic distribution shows that a maximum of 28 vehicles will use the 41st Street at-grade crossing to travel outbound to the west during the PM peak hour, while a maximum of 7 vehicles will use 38th Place at-grade crossing to travel inbound from the east during the AM and PM peak hours. These crossings are currently used by existing traffic, and are adequately equipped with various warning and safety devices to alert and prevent traffic crossing during train movements across 41st Street and 38th Place, and allow safe crossings of traffic when there are no train movements. Therefore, no additional safety measures are deemed necessary at these at-grade rail crossings to accommodate traffic from the project...*
>
> *...The analysis also indicates that the project trips will not exceed the thresholds of requirements for Metro's Congestion Management Program (CMP) analysis. Similarly, the thresholds of requirements for Caltrans District 7's freeway segment and off-ramp analysis will not be exceeded. Therefore, the project will not have a significant impact on the CMP network and freeway segments or off-ramps. The two at-grade rail crossings near the project sites will be used by the project traffic; however, these rail crossing are currently adequately equipped with warning and safety devices.*

[47] Sage Strategies, LLC. October 3, 2014. Appendix XI. Addendum to Traffic Impact Study. Prepared by Traffic Design, Inc.

COMMENT NO. E44-5

The DEIR's conclusion that community gardens do not carry local community value and economic benefits is extremely short-sighted and insensitive to communities of color, and communities in need. During operation of the South Central Farm years, it was proven to reduce crime in the area significantly, as well.

RESPONSE NO. E44-5

Your comment regarding the value and economic benefits of community gardens, sensitivity to communities of color and in need has been noted. Your concerns will be taken into consideration by the decision-makers prior to taking action on the proposed project. For further information on the Alternatives Analysis and community garden alternative, please see Response to Comment Nos. E44-1 and E44-2.

COMMENT NO. E44-6

For the people of South LA, access to healthy food – broccoli, asparagus, tomatoes (as opposed to chips, sodas, and candy), as well as skills to produce this food -- are matters of life and death, of sight and blindness. In essence, the DEIR's conclusion negating community value of organic gardens sends a Marie Antoinette message – not let them eat cake, but let them feast on salt, sugar, and fat while other more fortunate areas of Los Angeles enjoy the privilege of eating healthy food and living robust lives.

RESPONSE NO. E44-6

Your comment regarding the value of community gardens and access to healthy foods has been noted. The commenter's opinion on the conclusions of the Draft EIR has been noted and forwarded to the decision makers for their consideration prior to taking action on the proposed project. For further information on the Alternatives Analysis and community garden alternative, please see Response to Comment Nos. E44-1 and E44-2.

COMMENT NO. E44-7

I was equally appalled to read that the DEIR fails to recognize the community value in using the land for recreational purposes. Are we to believe there is a positive net gain in setting aside the land for polluting industrial use, for possible release of carcinogens and other toxins, rather than giving the children of Los Angeles a place to play and run and get in shape? This is a shameful conclusion, truly embarrassing to read.

RESPONSE NO. E44-7

Your comment regarding the value in using the land for recreational purposes has been noted. The commenter's opinion on the conclusions of the Draft EIR has been noted and forwarded to the decision makers for their consideration prior to taking action on the proposed project. As detailed in Response to Comment Nos. E44-1 and E44-2, the project's cash pledge agreement will contribute to open space in the City in a more suitable location, while the project site would be developed consistent with its Community Plan designation, goals and policies, and the project objectives.

The Existing Conditions section in Section IV.B *Air Quality* of the Draft EIR includes ambient air quality data gathered from the local air quality monitoring stations. The average concentrations and days above

the standard for each criteria air pollutant are listed in Table IV.B-6 *Summary of 2010-2012 Ambient Air Quality Data in the Proposed Project Vicinity* on page IV.B-11 of the Draft EIR. The Air Quality impact analysis relative to the impacts of the proposed project is further detailed below, and is located in Section IV.B *Air Quality* of the Draft EIR. In the Draft EIR, sensitive receptors are defined on page IV.B-11. There are two maps showing their locations: Figure IV.B-1 *Sensitive Receptors* and Figure IV. B-2 *Receptor Grid and Sensitive Receptors*.

Construction emissions are shown in Table IV.B-8, *Unmitigated Estimated Daily Regional Construction Emissions,* and are only significant for PM_{10}. Operational emissions are shown in Table IV.B-9, *Unmitigated Estimated Daily Operational Emissions*, and are not significant for any of the criteria air pollutants. The PM_{10} emissions from construction will be mitigated to below the level of significance with the implementation of the seven mitigation measures.

The primary sources of TAC emissions associated with the proposed project's operations would be limited to DPM from delivery trucks. The results of the TAC analysis are shown in Table IV.B-11, Summary of DPM Health Impact Results. As described in Section IV.B (page IV.B-22) of the Draft EIR, the resulting maximum potential cancer risk is 0.3 in a million, which is only 3 percent of the cancer risk threshold of 10 in a million as set by SCAQMD Rule 1401.

Diesel emissions are particularly examined in the Health Risk Assessment (HRA) found in Appendix V in Volume IV of the Draft EIR. The Draft EIR concluded that noise from the proposed project would have a less than significant impact. Please refer to the Initial Study in Appendix III of this Draft EIR, and to Appendix IS-1, Noise Technical Report, for further information. Cumulative air quality impacts are further discussed on pages IV.B-22 and IV.B-23 of the Draft EIR.

The Department of Toxic Substances Control (DTSC) has reviewed the site characterization and health risk assessment for the site and has concluded that the site is suitable for Industrial/Commercial use, and that future development or rezoning of the property for other than Industrial/Commercial use will require additional analysis and risk evaluation by DTSC to determine the suitability of the site for such use (included as Appendix N to the Final EIR).[48]

COMMENT NO. E44-8

Please re-do this DEIR to take into consideration the abundant community values in using this land for gardening and recreation.

RESPONSE NO. E44-8

Your comment on using the project site for recreational uses has been noted. As detailed in Response to Comment Nos. E44-1 and E44-2, the alternatives analysis withdrew the community garden and recreation alternatives as being infeasible as they did not meet basic objectives of the project. The project's cash pledge agreement will contribute to open space in the City in a more suitable location, while the project site would be developed consistent with its Community Plan designation, goals and policies, and the project objectives. Your concerns will be taken into consideration by the decision-makers prior to taking action on the proposed project.

[48] Department of Toxic Substances Control. 22 December 2015. Letter from Brownfields and Environmental Restoration Program—Chatsworth Office, Haissam Y. Salloum, Senior Engineer, to City of Los Angeles, Department of City Planning, William Lamborn.

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LETTER NO. E45

Leonila Munoz

COMMENT NO. E45-1

Hello, my name is Leonila Muñoz. I have lived in Los Angeles for almost 15 years. I have worked for IMPACT these past 5 years. Thanks to this job, I have been able to provide a home and support my children. Also, thanks to this job, I am able to help my daughters attend University. I am very happy that thanks to this job I have been able to lead a fuller life. The boss is a very good person; he enjoys camaraderie and working alongside us.

RESPONSE NO. E45-1

Your comment on the proposed project has been noted. Your concerns will be taken into consideration by the decision makers prior to taking action on the proposed project.

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LETTER NO. E46

Jack Neff Letter No. 1
P.O. Box 491272
Los Angeles, CA 90049

COMMENT NO. E46-1

In Re the above referenced matter, these public comments are truncated to a miniscule degree of the scope of all the issues this Commenter needs to note concerning that certain real estate within the City of Los Angeles designated within City Planning's file going forward as the above-referenced matter.

Firstly, it appears critical documents concerning public safety and traffic impacts have been indexed as being in the proposed Draft EIR, but are not locatable at the citations provided by City Planning.

These documents are shown on the List of Tables, Vol. I, Secs. I-IX:

Appendix IV: IV.B-10 Proposed Project Traffic Conditions for 2016 ..... IV.B-20
IV.G-2 2014 Existing Traffic Conditions IV.G-7
IV.G-3 Freeway Segment Analysis..... IV.G-8
IV.G-4 Freeway Off-Ramp Analysis IV.G-8
IV.G-5 Level of Service Descriptions..... IV.G-11
IV.G-6 Level of Service Criteria IV.G-12
IV.G-7 Proposed Project Traffic Conditions for 2016 ..... IV.G-14

RESPONSE NO. E46-1

Your comment regarding the location of documents related to public safety and traffic impacts has been noted. The Traffic Study was appended to the Initial Study and hence is in Volume III of the Draft EIR, which is the initial study and its appendices. The tables mentioned in the comment regarding Existing Traffic Conditions, Freeway Segment Analysis, Freeway Off-Ramp Analysis, level of service description and criteria, and Proposed Traffic Conditions for 2016 are in reference to the Addendum to the Traffic Impact Study, which is located in Volume VI, Appendix IX, to the Draft EIR. In particular, see Table 2 (page 5) for existing and future intersection conditions. The freeway ramp analysis is found on page 8 of the Addendum.

COMMENT NO. E46-2

As such, this comment firstly requests additional time beyond, up to and including an additional 45 days from the noticed closing of Public Comments on March 9, 2015 at 4:00 p.m., or June 14, 2015, to submit crucial supplemental comments to necessarily confront the specifics of the dollar amount in concessions the developer is asking from the City, concessions in accountability of various sister governmental and public sector entities along the overlying jurisdictions controlling that certain area of real estate within the City of Los Angeles designated within City Planning's file going forward as the above-referenced matter.

RESPONSE NO. E46-2

Your comment regarding the review period for the Draft EIR and the role of public agencies in the review of the Draft EIR has been noted. The Notice of Completion of the Draft EIR was distributed to 3 federal agencies, 12 State agencies, 7 regional and local agencies, 8 County agencies, and 55 City agencies. The 45 day review period for the Draft EIR provides these agencies with an opportunity to comment on any

concerns they may have on the proposed project. The Final EIR is required to address any concerns raised by these agencies. Responses to agencies that submitted comments can be found in Response to Comment Nos. B1 through D2 in this Section III, *Responses to Comments*. The letter dated March 9, 2015 from the State Office of Planning and Research acknowledges that the project has fulfilled CEQA requirements relative to the distribution of the Draft EIR to state agencies for review. According to Section 15105 of the State CEQA Guidelines, the public review period for a draft EIR shall not be less than 45 days. The Notice of Completion for the Draft EIR was filed on January 22, 2015, and the public review period ended on March 9, 2015, for a period of 46 days.

COMMENT NO. E46-3

Controversies abound on the face of the proposed draft EIR in the City Planning file, beginning with the document therein entitled "NOTICE OF COMPLETION AND AVAILABILITY OF ENVIRONMENTAL IMPACT REPORT ENV-2012-920-EIR; STATE CLEARINGHOUSE NUMBER: 2014061030", dated January 22, 2015 (the "NOP"). On page 2 therein, topic entitled "ANTICIPATED SIGNIFICANT ENVIRONMENTAL EFFECTS" I note one of the significant impacts identified by City Planners was "greenhouse gas emissions, hazards and hazardous materials, and land use and planning." Although City Planners say that as proposed, according to this same document from City Planning's file, the proposed new construction, "With implementation of the proposed mitigation measures" will likely have "no significant and unavoidable project or cumulative impacts in these issue areas addressed in the EIR are expected with regard to construction or operation of the proposed project."

The developer is conceding the controversial nature of the project, and so the issue of bias of City Planners is present. Questions concerning conflicting "Anticipated Significant Environmental Effects" must be addressed and more time is necessary to determine which of the "anticipated significant environmental effects" will receive priority in the course of mitigation and going forward to approval of the proposed draft EIR.

RESPONSE NO. E46-3

Your comments regarding issues that were carried forward for further analysis in the Draft EIR have been noted. Based on public and agency comments in response to the NOP and a review of environmental issues by the Department of City Planning, the appropriate scope of the Draft EIR was determined to include seven environmental issues:

- Air Quality
- Cultural Resources
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Land Use and Planning
- Transportation/Traffic
- Utilities and Service Systems

The above issue areas were found to have potentially significant impacts and therefore were carried forward for analysis in the Draft EIR. Information regarding mitigation measures can be found in Section I, pages 1 through 14 of the Draft EIR and pages IV-17 through IV-20 of Section IV, *Corrections and Additions to the Draft EIR* of this Final EIR. Mitigation Measures for Air Quality, Cultural Resources, and Utilities and Services Systems will reduce impacts to below a level of significance. However, traffic impacts at the intersection of Alameda Street and East Washington Boulevard will remain significant. All other categories are not expected to result in significant impacts and, as such, mitigation is not required.

The analysis provided in the Draft EIR demonstrates that any potential impacts identified in the above issue areas can be mitigated to the level of insignificance with mitigation measures.

COMMENT NO. E46-4

The proposed Draft EIR is a fraction of the material within City Planning's file, which references therein the South East Los Angeles Community Plan (the "Plan"), which in its current state is a work in progress, with various controversial proposals competing for the imprimatur of the Plan, including this proposed Draft EIR. Therefore the extent of the controversies disclosed by the proposed Draft EIR, could be said to include lobbying interests intersecting with the City, various sister governmental entities along the overlying jurisdictions controlling that certain area of real estate within the City of Los Angeles designated within City Planning's file going forward as the above-referenced matter.

This Commenter requests more time to investigate the the South East Los Angeles Community Plan and its proposed role in proposed Draft EIR. Otherwise, will City Planning be signing off on issues of accountability and put the public welfare entrusted to it and its sister governmental agencies into the hands of commerce and subject to their extensive liabilities for the public welfare?

RESPONSE NO. E46-4

Your comment relating to the South East Los Angeles Community Plan and your request for additional time to review the South East Los Angeles Community Plan has been noted. The Southeast Los Angeles Community Plan was adopted by the City Council on August 1, 2001, Ordinance No. 174172. The Southeast Los Angeles Community Plan can be found online at: http://planning.lacity.org/complan/central/selpage.htm. The proposed project is consistent with the Southeast Los Angeles Community Plan. The 45 day review period for the Draft EIR provides agencies and the public with an opportunity to comment on any concerns they may have on the proposed project. The Final EIR is required to address any concerns raised by agencies and the public. Responses to agencies that submitted comments can be found in Response to Comment Nos. B1 through D2 in this Section III, *Responses to Comments*. The letter dated March 9, 2015 from the State Office of Planning and Research (Letter No. B5) acknowledges that the project has fulfilled CEQA requirements relative to the distribution of the Draft EIR to state agencies for review. According to Section 15105 of the State CEQA Guidelines, the public review period for a draft EIR shall not be less than 45 days. The Notice of Completion for the Draft EIR was filed on January 22, 2015, and the public review period ended on March 9, 2015, for a period of 46 days. Your comments will be taken into consideration by the decision makers prior to taking action on the proposed project.

COMMENT NO. E46-5

Developer's Requests for Concessions

In the Draft Environmental Impact Report, III Project Description, Page III-6 (page 40, top in pdf), the developer is requesting a laundry list of concessions from a panoply of governmental agencies.

"Other permits, ministerial or discretionary, may be necessary in order to execute and implement the proposed project. Such approvals may include, but are not limited to: landscaping approvals, exterior approvals, permits for driveway curb cuts, storm water discharge permits, grading permits, installation and hookup approvals for public utilities and related permits."

Thus the developer admits the proposed Draft EIR insufficiently accounts for a huge portion of the actual execution of the project and is requesting a blank check to build on that certain real estate which is the subject of the City Planning file.

Currently the City Planning file contains developer requests for concessions from City Planning, City agencies and bureaus and from the City's sister governmental agencies like the Port of Los Angeles, the Alameda Corridor Special Authority, the Southern California Air Quality Management District, Cal-EPA/Department of Toxic Substance Control, California Department of Resources, the Metropolitan Transit Authority, and others. These concessions, in the words of the proposed Draft EIR include:

· 12' street widening on Long Beach Avenue
· 5' street widening on Martin Luther King, Jr. Blvd.
· 24.5' street widening on South Alameda Street
· 22' street widening on 41st Street

I. Introduction/Summary, Page I-5

The approximate area of these street concessions totals an unknown amount of land, land which now controlled by the City, the Department of Transportation, the MTA, rail agencies. Is the developer going to be accountable for events on these streets to the extent the as the City or will the people of Los Angeles suffer from decreased accountability as a result of the City granting the developer these street concessions?

RESPONSE NO. E46-5

Your comment reciting information from the Draft EIR that other permits, ministerial or discretionary, that may be necessary in order to execute and implement the proposed project has been noted. The various departments of the City of Los Angeles (e.g., Department of City Planning, Department of Transportation, Bureau of Engineering, etc.) have jurisdictional authority over the project and project approval will be completed with coordination between all these departments. The project is within the City's Southeast Los Angles Community Plan area and, therefore, all the street standards (e.g., roadway width, sidewalk, right-of-way, street and highway dedications, etc.) will apply to this project.

The City Bureau of Engineering process for street dedication allows the City to obtain necessary public street right-of-way from private property owners to meet City standards. Every street in the City of Los Angeles is classified according to its prescribed transportation use. The categories include Major and Secondary Highways, Collector Streets, and various classifications of local and hillside streets. Each type of street has a required right-of-way width, roadway width, and sidewalk width. In order to enforce these requirements, the Bureau of Engineering has the authority to obtain the necessary right-of-way from private property owners when the properties are developed. One of two methods of obtaining the necessary right-of-way occurs through a Highway Dedication clearance on a Department of Building and Safety Building Permit Application (B&S Application).

The following table shows the ROW dedications for the streets surrounding the project site:

Street Name	Existing SELACP			SELACP Update			Mobility Plan 2035		
	Class.	ROW ½ Width (feet)	Roadway ½ Width (feet)	Class.	ROW ½ Width (feet)	Roadway ½ Width (feet)	Class.	ROW ½ Width (feet)	Roadway ½ Width (feet)
41st Street	Major Hwy Class II	52	40	Collector	32	22	Collector	33	20
Alameda Street	Major Hwy Class II	52	40	Major Street	---	---	Avenue III	36	23
Martin Luther King Blvd.	Local (standard)	30	18	Local (standard)	30	18	Local (standard)	30	18
Long Beach Ave.[49]	Major Hwy Class II	52	40	Collector	32	22	Boulevard I	38	25

The project has been reviewed under the existing standards described in the DOT letter dated October 4, 2013. However, the required dedications under the Mobility Plan 2035 would be as in the table above. The project will comply with applicable street dedications to the satisfaction of the pertinent City agencies including Planning, DOT, and BOE.

In addition to the right-of-way dedication, the private property owner may be required to make necessary improvements such as roadway widening and installation of curb, gutter, curb ramps, and sidewalk. If the existing public right-of-way is already fully improved, the private property owner is requested to construct additional sidewalk over the newly dedicated property, repair or replace broken and off grade sidewalk, and close unused driveways.

COMMENT NO. E46-6

The developer is also requesting concessions in the proposed Draft EIR,III Project Description, Page III-5 on page 39.

"D. DISCRETIONARY ACTIONS In order to allow development of the proposed project, the following discretionary approvals are required:

Approval of Parcel Map No. AA-2012-919-PMLA to permit the subdivision of one 546,921 net square-foot parcel into four lots.

Site Plan Review to develop more than 50,000 square feet of non-residential floor area. Merger of the right-of-way of 40th Place and the two alleys north and south of 40th Place"

If approved by City Planning, Approval of Parcel Map No. AA-2012-919-PMLA, is a concession to the developer which the developer must offset by mitigation or else the public purse is at a loss for the net tax revenues which the current lot line configuration is assessed for.

[49] Long Beach Avenue is designated as a Major Highway II in the existing SELACP and proposed update to the SELACP which requires a dedicated right-of-way width of 104 feet and a roadway width of 80 feet The current dedicated right-of-way width of Long Beach Avenue is 140 feet which includes 60 feet of right-of-way for the Metro Blue Line light rail line. Long Beach Avenue is designated as a Boulevard I in Mobility Plan 2035 which requires a dedicated right-of-way width of 136 feet which includes the 60 feet of Blue Line right-of-way. The currently dedicated right-of-way width of 140 feet complies with the requirements of the existing and proposed SELACP and Mobility Plan 2035.

RESPONSE NO. E46-6

As mentioned in Response to Comment No. E46-5, the granting of additional permits, inclusive of parcel map approval, site plan review and merger of the right-of-way, will be subject to City regulations separate from the CEQA process.

COMMENT NO. E46-7

A Site Plan Review to develop new construction for this proposed project is much more than 50,000 square feet, it's almost 10 times that amount, according to the proposed Draft EIR, the Site Plan Review must cover approximately 464,000 square feet. Approval of a single site plan by City Planning must provide accountability by the developer which is presently under the jurisdiction of the City and various sister governmental agencies, or the public interest will lose the oversight and control arising from those mandates and authority.

RESPONSE NO. E46-7

Your comment regarding the size of the proposed project has been noted. According to City regulations, Site Plan Review is required for non-residential projects over 50,000 square feet. Projects under 50,000 square feet would not be required to undergo Site Plan Review. As the proposed project is 480,120 square feet it is required to undergo Site Plan Review.

COMMENT NO. E46-8

Other agencies that may have jurisdiction over some aspects the proposed project include, but are not limited to:

California Department of Transportation
Department of Toxic Substances Control
Regional Water Quality Board
South Coast Air Quality Management District

Does the concessions the developer is asking for from the City and various sister governmental entities overturn a consensus mandate to address airborne particle emissions along the entire Alameda Corridor? Does the record show that a succession of planning and regulatory entities generally regarded as relevant have stated greenbelts, water features, pedestrian-friendly amenities along the 5 designated California impacted port areas, which includes Alameda Corridor, along a section wherein lies that certain real estate which is the subject of City Planning's file? This information is needed to complete my public comments on the subject.

RESPONSE NO. E46-8

Your comment regarding agency review of the Draft EIR has been noted. The Notice of Completion of the Draft EIR was distributed to 3 federal agencies, 12 State agencies, 7 regional and local agencies, 8 County agencies, and 55 City agencies. The 45 day review period for the Draft EIR provides these agencies with an opportunity to comment on any concerns they may have on the proposed project. The Final EIR is required to address any concerns raised by these agencies. However, the concerns raised regarding California impacted Port areas within the Alameda Corridor is not a project specific issue to the proposed project, and would be addressed separately in an environmental report prepared for the Alameda Corridor Transportation Authority. Responses to agencies that submitted comments related to this proposed project can be found in Response to Comment Nos. B1 through D2 in this Section III,

Responses to Comments. The letter dated March 9, 2015 from the State Office of Planning and Research (Letter No. B5) acknowledges that the project has fulfilled CEQA requirements relative to the distribution of the Draft EIR to state agencies for review. According to Section 15105 of the State CEQA Guidelines, the public review period for a draft EIR shall not be less than 45 days. The Notice of Completion for the Draft EIR was filed on January 22, 2015, and the public review period ended on March 9, 2015, for a period of 46 days.

COMMENT NO. E46-9

Developer is stating he will build 368 parking spaces, but I did not find anything in the proposed Draft EIR which shows necessary accommodations for at least 368 employees. In facilities the size developer is proposing, developer would have to provide eating facilities for at least 100 people who work there. I found no mention that these or any other such accommodations were planned to be provided, as required the law.

RESPONSE NO. E46-9

Your comment regarding the adequacy of parking for the proposed project has been noted. The buildings will have 353,375 square feet of warehouse space, 112,745 square feet of office space, and 14,000 square feet of manufacturing space. Required parking for warehouse use is one space per 500 square feet of floor area for the first 10,000 square feet and one space per 5,000 square feet of floor area thereafter. Required parking for office and manufacturing use is one space per 500 square feet of floor area.[50] The number of parking spaces required for the proposed development is therefore 403. The proposed project will provide 404 on-site parking spaces, which exceeds applicable requirements by 1 parking space. The proposed project is also providing a total of 49 short term and 60 long term bicycle parking spaces, which can be used to replace up to 64 required automobile parking spaces at a ratio of one automobile parking space for every four bicycle parking spaces.[51] It is further anticipated that the location of the proposed project in proximity to the Metro Blue Line light rail line would enable employees to use alternate means of transportation, thus further reducing the need for on-site parking. Street parking will also continue to be available on East 41st Street and the south side of Martin Luther King, Jr. Boulevard. The applicant is required to comply with all City, State, and Federal regulations regarding health, safety, and worker well-being. A discussion of these regulations and how the applicant will comply with them is outside of the scope of the Draft EIR.

COMMENT NO. E46-10

CALIFORNIA DEPARTMENT OF TRANSPORTATION

According to the July 14, 2014 letter from Dianna Watson, IGR/CEQA Branch Chief, Cal- DOT, District 7, Transportation Planning, found on page 11 of 543, Volume II, Appendix II of the proposed Draft EIR, "The project will create a net total of approximately 2,052 new two-way passenger car equivalent trips per day...However, trip generation needs to include employee trips...Based on the traffic data received, when the related projects are built, there may be significant cumulative traffic impact to the State facilities" (i.e., the 10 freeway). Thus, the developer is requesting a concession from another sister agency to the City that the public purse bear more than 4,104 additional car trips will be made each day as a result of the new construction in proposed Draft EIR. If the developer actually builds this project, additional

[50] City of Los Angeles Municipal Code § 12.21.A.4(c). Accessed 3-18-15. Available online at: https://law.resource.org/pub/us/code/city/ca/LosAngeles/Municipal/chapter01.pdf

[51] City of Los Angeles Municipal Code § 12.21.A.4. Accessed 3-18-15. Available online at: https://law.resource.org/pub/us/code/city/ca/LosAngeles/Municipal/chapter01.pdf

mitigation must be included for significant traffic impacts which affect the daily lives of people. I propose using block grants to fund greenbelts, additional landscaping and pedestrian-friendly amenities be added to the project as part of the cost of adding to the traffic woes already existing.

RESPONSE NO. E46-10

Your comment regarding Caltrans comments on potential traffic impacts from the proposed project and the use of block grants for funding amenities have been noted. Responses to Caltrans' comments were incorporated into Section IV.G, *Transportation/Traffic*, and Appendix IX, *Addendum to Traffic Impact Analysis*, in the Draft EIR. Cumulative traffic impacts are estimated with future traffic volumes consisting of traffic from the proposed project as well as all other known related projects in the immediate 2-mile radius of his project. Per LADOT's October 2013 agreement with Caltrans, freeway impact analysis is conducted by comparing estimated project traffic to be added to the freeway mainline segments and ramps to 1% of existing freeway volumes for facilities operating at LOS E or F. Cumulative impact analysis shows no significant traffic impacts attributable to this project except at Alameda Street and East Washington Boulevard during the PM peak hour, and project's traffic volume to be added to freeway segments and ramps would not exceed the screening criteria of 1% of existing freeway volumes. A discussion of the use of block grant funding for amenities is beyond the scope of this document.

COMMENT NO. E46-11

California Public Utilities Commission

Chi Cheung To, P.E., Utilities Engineer, Rail Crossings Engineering Section ("RCES"), of the PUBLIC UTILITIES COMMISSION, reviewed the Notice of Preparation of Draft EIR ("NOP") regarding City Planning's file. In his June 19, 2014 to Ms. Hewawitharana of City Planning, Mr. To states California Public Utilities Commission (Commission) has jurisdiction over the safety of highway rail crossings (crossings) in California. The California Public Utilities Code requires Commission approval for the construction or alteration of crossings and grants the Commission exclusive power on the design, alteration, and closure of crossings. According to Mr. To, the project includes construction of four (4) industrial buildings.

"The 41stStreet at-grade crossing (ID: CPUC No. 001BBH-486.13, DOT No. 747835D) and the 38th place crossing (ID: CPUC No. 001BG-486.00, DOT No. 747607R) are located immediately on the west and east sides of the project site respectively. Currently, there are over 100 combined light-rail and freight train movements per day at the 41st Street crossing, with a maximum speed of 30 miles per hour. Any development adjacent to or near the railroad right-of-way (ROW) should be planned with the safety of the rail corridor in mind."

The proposed Draft EIR offers a commitment to a local hire agreement and a cash pledge to local recreation facilities, but the developer makes no offer, and has no means to indemnify the public regarding Mr. To's concerns stated on page13 of 543 of Volume II, Appendix II of the proposed Draft EIR, the safe operation of the adjacent railway lines.

Mr. To correctly points out that new developments will increase traffic volumes not only on streets and at intersections, but also at any adjacent at-grade rail crossing. "Any traffic impact studies undertaken should address rail crossing safety analysis and **associated proposed mitigation measures** [emphasis added]. Safety analysis should include queuing on tracks, pedestrian movements, turning movements and sightlines. Safety improvement measures may include the planning for grade separations for major thoroughfares [of which there are several], improvements to existing at-grade rail crossings due to

increase in traffic volumes (e.g., addition or upgrade of crossing warning devices, active and passive signs, tactile surfaces and edge lines on sidewalks, and channelization fencing)."

The proposed Draft EIR contains none of the elements called for by Mr. To, and developer will avoid accountability for the PUC's responsibilities if City Planning approves the project without providing answers to all of Mr. To's concerns.

Mr. To further notes, "any modification to an existing public rail crossing requires authorization from the Commission. RCES representatives are available for consultation on any potential safety impacts or concerns at crossings. Please continue to keep RCES informed of the project's development.

My question is whether City Planning or the developer have the resources or political will necessary to keep RCES involved in railway crossing safety mitigation throughout City Planning's process. Indications within the proposed Draft EIR is that no resources exist to support railway crossing safety mitigation measures as RCES is not even included in Section VII, Acronyms and Abbreviations despite representing critical public safety accountability adjacent to that certain real estate which is the subject of City Planning's file in this matter.

RESPONSE NO. E46-11

Your comment regarding comments from the California Public Utilities Commission regarding the safety of highway rail crossings has been noted. The project's traffic distribution shows that a maximum of 28 vehicles will use the 41st Street at-grade crossing to travel outbound to the west during the PM peak hour, while a maximum of 7 vehicles will use 38th Place at-grade crossing to travel inbound from the east during the AM and PM peak hours. These crossings are currently used by existing traffic, and are adequately equipped with various warning and safety devices to alert and prevent traffic crossing during train movements across 41st Street and 38th Place, and allow safe crossings of traffic when there are no train movements. Therefore, no additional safety measures are deemed necessary at these at-grade rail crossings to accommodate traffic from the project. Further and ongoing coordination with CPUC will continue as necessary to adequately address these concerns.

COMMENT NO. E46-12

Wastewater Engineering Services, Bureau of Sanitation, City of Los Angeles

According to Ali Poosti, Division Manager, Wastewater Engineering Services Division, Bureau of Sanitation, City of Los Angeles, in his June 14, 2014 memo to Ms. Hewawitharana of City Planning (pages 14-16 of 543, Volume II, Appendix II of the proposed Draft EIR):

"The estimated flow that would be generated from your proposed project exceeds 20,000 GPD [gallons per day]and therefore may have a **significant impact** on the sewer system capacity [emphasis added]. Thus, detailed gauging is necessary to determine whether the sewer system is capable of safely accommodating the total flow for your proposed project. We have initiated a work order to gauge the designated critical locations in the project area. This process usually takes approximately three (3) to four (4) weeks. A detailed evaluation and response will be provided to you within one (1) to two (2) weeks upon receipt of gauging data."

Mr. Poosti provided the following data to support his understanding:

"Projected Wastewater Discharges for the Proposed Project:

Type Description	Average Daily Flow per Type Description (GPO/UNIT)	Proposed No. Units	Average Daily Flow (GPD)
Proposed			
Warehouse	30 GPD/1000 SQ.FT	365,945 SQ.FT	10,978
Office Space	170 GPD/1000 SQ.FT	85,181 SQ.FT	14,481
Manufacturing	50 GPD/1000 SQ.FT	29,896 SQ.FT	1,495
Total			**26,954**

"SEWER AVAILABILITY

The current approximate flow level (diD) and the design capacities at *diD* of 50% in the sewer system are as follows:

Sewer Diameter (in)	Pipe Location	Current Gauging d/D (%)	50% Design Capacity
8	Martin Luther King Jr. Blvd.	25	198,599 GPD
10	Martin Luther King Jr. Blvd.	*	360,084 GPD
8	40th Pl.	*	229,323 GPD
8	41st St.	*	229,323 GPD
10	Long Beach Ave. East	*	394,453 GPD
45	41'1 Pl.	30	294,000 GPD
45	41st Pl.	41	427,000 GPD

* No gauging available

"City of Los Angeles Bureau of Engineering has requested additional gauging to support the sizing and location of sewer connections, as a means of avoiding impacts to the public sewer system." As a result, all of the Alternatives proposed by City Planning would require the implementation of mitigation measure Utilities and Service Systems-1.

Mr. Poosti also demands stormwater mitigation is required of the proposed Draft EIR with the preferred uses being infiltration, capture/use, and biofiltration as the preferred stormwater control measures. Review of the proposed Draft EIR contains nothing to address Mr. Poosti's mandate for accountability of the developer for meeting water use policy standards.

Mr. Poosti's stormwater analysis reads:

"The Bureau of Sanitation, Watershed Protection Division (WPD) is charged with the task of ensuring the implementation of the Municipal Stormwater Permit requirements within the City of Los Angeles. We anticipate the following requirements would apply for this project."

"POST -CONSTRUCTION MITIGATION REQUIREMENTS
The project requires implementation of stormwater mitigation measures. These requirements are based on the Standard Urban Stormwater Mitigation Plan (SUSMP) and the recently adopted Low Impact Development (LID) requirements. The projects that are subject to SUSMP/LID are required to incorporate measures to mitigate the impact of stormwater runoff. The requirements are outlined in the guidance manual titled "Development Best Management Practices Handbook -Part B: Planning Activities". Current regulations prioritize infiltration, capture/use, and then biofiltration as the preferred stormwater control measures. The relevant documents can be found at: www.lastormwater.org. **It is**

advised that input regarding SUSMP requirements be received in the early phases of the project from WPD's plan-checking staff." [emphasis added].

Has the developer been in touch with WPD regarding the SUSMP requirements? Will Mr. Poosti be kept in the loop with this project going forward? Has the developer made any commitments or cash pledges to protect and carefully utilize the public's water in the new construction? It think not because the WPD is not even included in Section VII, Acronyms and Abbreviations despite representing critical public resource (water) accountability within and adjacent to that certain real estate which is the subject of City Planning's file in this matter.

Mr. Poosti also informed the developer about the City's construction standards:

"The project is required to implement stormwater control measures during its construction phase. All projects are subject to a set of minimum control measures to lessen the impact of stormwater pollution. In addition for projects that involve construction during the rainy season that is between October 1 and April 15, a Wet Weather Erosion Control Plan is required to be prepared."

"Also projects that disturb more than one-acre of land [this is an over 13-acre proposed Project] are subject to the California General Construction Stormwater Permit. As part of this requirement a Notice of Intent (NOI) needs to be filed with the State of California and a Storm Water Pollution Prevention Plan (SWPPP) needs to be prepared. The SWPPP must be maintained on-site during the duration of construction."

Has the developer made any commitment or cash pledge to be accountable for stormwater control measures during construction? Why don't any of the developer's project drawings or maps indicate any stormwater control measures?

Mr. Poosti provided photographs of the acceptable stormwater control measures necessary to mitigate water on the land (pages 24-29 of 543, Volume II, Appendix II of the proposed Draft EIR):

Bioswale A bioswale is a broad, shallow channel with a dense stand of vegetation covering the side slopes and bottom. Bioswales are designed to treat stormwater primarily through filtration, and plant uptake before conveying the flow to a downstream discharge location. The vegetation helps in reducing flow velocity to prevent erosion. Can be planted with either grass or native vegetation, bioswales are best served in residential, industrial, and commercial landuse with smaller tributary drainage areas. Storm Water Solutions | Storm Water & Erosion Control

Planter Boxes Planter boxes provide stormwater treatment through filtration and adsorption. Stormwater is captured and treated via filtration through the soil media and root zone and evapotranspiration through the planted vegetation before discharging back to storm drain system.

Infiltration Trench An infiltration trench is a long, narrow, rock-filled trench bordered on each side by a grass or vegetated buffer. Runoff is stored in the void space between the stones and infiltrates through the bottom into the soil matrix. The buffer strips provide pretreatment to limit the amounts of coarse sediments entering the trench which can cause clogging.

Bioretention/Infiltration Curb Inlets They provide stormwater treatment as well as peak flow attenuation through storage and filtration/infiltration, and adsorption. Stormwater is captured and treated via filtration/infiltration through the soil media and evapotranspiration through the planted vegetation.

Biotreatment Curb Inlet Biotreatment curb inlets are well suited for the urban environment. They add green space while providing stormwater runoff treatment. Unlike end-of-line treatment systems, it treats smaller drainage areas closer to the source of pollutants. This BMP can be used in retrofit project using existing catch basins and provides a natural approach to address high levels of fecal coliform and enterococcus bacteria, as well as other pollutants found in stormwater.

Curb Extension Curb extensions have historically been used to slow traffic and improve pedestrian safety. A landscaped curb extension version are now being increasingly used to treat stormwater runoff and provide green space. Essentially similar to rain gardens, they treat stormwater through filtration, infiltration, and evapotranspiration.

Pervious Concrete Pavement Pervious concrete is an open void material designed to allow rainwater to filter through the paved surface into the ground or a storage container rather than settling on the surface. It's two main objectives are runoff peak flow attenuation while provide stormwater treatment. Site specific design of the retention/recharge area include an initial soils site survey, and site specific storm water calculations for volume and duration.

Porous Concrete Pavers Similar to the porous concrete pavement, unit pavers provide a hardscape alternative to stormwater treatment BMPs. Unit pavers, or paving stones, are impermeable blocks made of brick, stone, or concrete, set on a prepared sand base. The joints between the blocks are filled with sand or stone dust to allow water to percolate downward.

Grass Pavers Similar in concept and function to the porous concrete pavements and unit pavers, the grass pavers are "landscaped" alternatives designed to allow infiltration of stormwater runoff to the underlaying soil media. Grass pavers, or turf blocks, are a type of open-cell unit paver whereby the cells are filled with soil and planted with turf. The cell matrix are typically made of concrete or synthetic material.

Recycled Rubber Sidewalk Originally used as alternatives to cracked sidewalks from protruding tree roots, rubber sidewalks are considered as another form of porous pavers to infiltrate runoff. Typically made of recycled rubber from waste tires.

Because there is no mention of stormwater control designs anywhere in the proposed Draft EIR, it appears the developer has not been in touch with Mr. Poosti about integrating the public's right to accountability into the proposed Project. City Planning should not use the proposed Draft EIR as instrument to help the developer evade accountability for the public interest in stormwater control without overtaxing existing storm control infrastructure with this high-density, zero-design consideration project.

Finally, Mr. Poosti states the proposed Draft EIR must adhere to the City's solid waste policies. "The City has a standard requirement that applies to all proposed residential developments of four or more units or where the addition of floor areas is 25 percent or more, and all other development projects where the addition of floor area is 30 percent or more. Such developments must set aside a recycling area or room for onside recycling activities."

In a search of the 194-page proposed Draft EIR I found no use of the words "recycle" or "recycling". As such, the developer has no credibility with respect to plans to adhere to the City's solid waste policies, and City Planning should not this fact in it's file concerning that certain real estate which is the subject matter of the proposed Draft EIR.

Mr. Poosti, the Division Manager, Wastewater Engineering Services Division, Bureau of Sanitation, City of Los Angeles, submits unchanged figures regarding planned water usage and sewage capacity in his

July 24, 2014 memo to Ms. Hewawitharana of City Planning (pages 20-21 of 543, Volume II, Appendix II of the proposed Draft EIR):

RESPONSE NO. E46-12

Your comment regarding the wastewater and storm water requirements has been noted. This response acknowledges the Gilbert Engineering Letter, dated Aug. 14, 2014, and the comments from the Wastewater Engineering Services at Bureau of Sanitation in the City of Los Angeles. Based on the June 20, 2013, and the January 14, 2016 letters, it is noted that further gauging may be required as part of a permit.

The City's Bureau of Sanitation has conducted a preliminary evaluation of the potential impacts to the wastewater and stormwater systems for the proposed project and estimated that the proposed project would generate 27,267 gallons per day of wastewater discharges.[52] Based on the estimated flows within the existing sewer system, the Bureau of Sanitation has determined that the sewer system may be adequate (Section IV.H, Page 8-9, Utilities). Additional analysis by the project applicant has indicated that the estimated discharge from the project will be 132,000 gallons per day (GPD) as shown in Appendix X of the Draft EIR. Given that the conservative estimate of the proposed project's discharge is expected to be 132,000 gallons per day, and the City's gauged capacity for the existing sewer system of 822,375 gallons per day, even with the project's discharge contribution there would still be 690,375 gallons per day of remaining capacity in the City's existing system. The City Bureau of Sanitation subsequenty has reviewed the project applicant's calculations and revised their estmate of discharge for the project to be 132,000 GPD which is in accordance with the project applicant's calculations. This is reflected in their comment letter dated January 14, 2016,[53] located in Appendix P to the Final EIR. However, further gauging and evaluation may be required as part of the permit process and that final approval for sewer capacity and connection permit will be made at that time.

To further clarify the distinction between the estimated generation of wastewater discharges from the proposed project and the availability and flow rates of the existing sewer system, the language in Section IV.H-8 of the Draft EIR has been revised as follows (see pages IV-11 and IV-12 of Section IV, Corrections and Additions, in the Final EIR):

"The proposed project would not result in significant impacts to utilities and service systems in relation to the construction of new water or wastewater treatment facilities or expansion of facilities. The proposed project site would continue to be serviced by existing City water and wastewater utility lines. The City's Bureau of Sanitation has conducted a preliminary evaluation of the potential impacts to the wastewater and storm water systems for the proposed project and estimated that the proposed project would generate 26,954 gallons per day of wastewater discharges.[54] Based on the estimated flows for the existing sewer system, the Bureau of Sanitation has determined that the sewer system may be adequate. However, additional analysis by the project applicant has indicated that the estimated discharge from the project will be 132,000 gallons per day. Given that the conservative estimate of the proposed project's discharge is expected to be 132,000 gallons per day, and the City's gauged capacity for the existing sewer system of 822,375 gallons per day, even with the project's discharge contribution there would still be 690,375

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52 Poosti, Ali, City of Los Angeles, Division Manager, Wastewater Engineering Services Division, Bureau of Sanitation. 24 July 2014. NOP Response Letter. Subject: 4051 South Alameda Street Project – Notice of Preparation EIR.

53 Poosti, Ali, City of Los Angeles, Division Manager, Wastewater Engineering Services Division, Bureau of Sanitation. January 14, 2016. Subject: 4051 South Alameda Street Project – Notice of Completion and Availability of Draft EIR (REVISED).

54 Poosti, Ali, City of Los Angeles, Division Manager, Wastewater Engineering Services Division, Bureau of Sanitation. 24 July 2014. NOP Response Letter. Subject: 4051 South Alameda Street Project – Notice of Preparation EIR.

gallons per day of remaining capacity in the City's existing system. However, further gauging and evaluation may be required as part of the permit process, and that final approval for sewer capacity and connection permit will be made at that time."

Although the impact to storm water and wastewater from the proposed project is expected to be less than significant, the following measures are provided to ensure all impacts are further reduced or minimized:

Measure Utilities and Service Systems-1

The project applicant shall either have further sewer system gauging obtained to identify a specific sewer connection point based on the capacity of the public sewer or build sewer lines to a point in the sewer system with sufficient capacity if the public sewer has insufficient capacity.

To address Mitigation Measure Utilities and Service Systems-1, the City Bureau of Engineering has requested additional gauging as part of the permit process to support the sizing and location of sewer connections. The Draft EIR has made a determination that the stormwater and sewer capacity would be adequate and therefore would not result in a significant impact.

Regarding stormwater controls during construction, per the Bureau of Sanitation letter, the Standard Urban Stormwater Mitigation Plan (SUSMP) and Low Impact Development (LID) requirements can be met by this project[55]. Additional infiltration may be needed during grading. Further detailed gauging and evaluation may be required as part of the permit as detailed in Mitigation Measure Utilities and Services Systems-1 above. The applicant shall also adhere to the source reduction and recycling policy adopted by the City, consistent with Assembly Bill 939, and the California Integrated Waste Management Act of 1989 pursuant to the same legislation. The applicant shall work with City of Los Angeles and Bureau of Sanitation and Bureau of Engineering to continue coordination in meeting storm water and wastewater policies, gauging, and permit requirements.

COMMENT NO. E46-13

Los Angeles County Metropolitan Transportation Authority ("LACMTA")

Marie Sullivan, Development Review Coordinator, Countywide Planning for the Los Angeles County Metropolitan Transportation Authority ("LACMTA"), wrote of the ATM's mandate to protect public transit infrastructure from developer's encroachments in her letter to to Ms. Hewawitharana of City Planning of June 26, 2014. (pages 30-51 of 543, Volume II, Appendix II of the proposed Draft EIR, with the following enclosures: Guidelines for Congestion Management Analysis, Noise Easement Deed/Acknowledgment/Certificate of Acceptance, Adjacent Construction Design Manual):

Ms. Sullivan is under the impression the Project provides 75 parking spaces. This is incorrect, the NOP and throughout the City Planning file, developer is seeking 368 parking spaces for the entire proposed Project. Ms. Sullivan also acknowledges the developer is seeking "merger of the right-of-way at 4051 South Alameda Street in the City of Los Angeles."

LACMTA, through Ms. Sullivan, has communicated to City Planning their "recommendations from LACMTA concerning issues that are germane to our agency's responsibility in relation to our facilities and services that may be affected by the proposed Project"

[55] Low Impact Development Manual. City of Los Angeles. Bureau of Sanitation Department of Public Works. June 2011. Available online at: http://www.lastormwater.org/wp-content/files_mf/lidhandbookfinal62212.pdf

LACMTA states "The development of this property may increase traffic values cross this at-grade crossing and could potentially impact the safety of the crossing. These traffic and safety impacts should be analyzed." Thus LACMTA joins California Department of Transportation and the PUC as sister governmental agencies acknowledging the detrimental traffic impacts of the proposed Project. Developer mitigation is necessary to offset these impacts and ensure these sister agencies are free to enforce accountability against the developer for safety and traffic hazards created by the proposed Project.

The developer has a duty under "Zoning Information No. 1117, **prior to the City issuing a building permit**, of the Metro Rail construction area, clearance shall be obtained from LACMTA. LACMTA will need to review engineering drawings and calculations." . . . "LACMTA requires an Engineering Review Fee for evaluation of any impacts based on adjacency and relationship of the proposed building to the Metro existing structures." [emphasis added].

Because the Long Beach Boulevard right-of-way is less than 100 feet from the edge of the sidewalk vacation sought by the developer, City Planning thus also has a duty under Zoning Information No. 1117, to withhold the developer's building permit up to and until the developer has obtained sufficient clearance from LACMTA. Further, City Planning should not grant any concession or fee waiver to offset developer's duty to pay the LACMTA Engineering Review Fee or LACMTA cost reimbursements as that would be irresponsible use of public funds and motivate developer to evade accountability with unsubstantiated Engineering projections and pointless delays.

Finally, Ms. Sullivan informs City Planning that developer has a large burden to conform the project to the Congestion Management Program statute, and enclosed the relevant statutory language. It appears that the proposed Draft EIR listed subject headings for traffic analysis, but which I cannot locate using the citations provided by City Planning:

Appendix IV: IV.B-10 Proposed Project Traffic Conditions for 2016 ..... IV.B-20
IV.G-2 2014 Existing Traffic Conditions IV.G-7
IV.G-3 Freeway Segment Analysis..... IV.G-8
IV.G-4 Freeway Off-Ramp Analysis IV.G-8
IV.G-5 Level of Service Descriptions..... IV.G-11
IV.G-6 Level of Service Criteria IV.G-12
IV.G-7 Proposed Project Traffic Conditions for 2016 ..... IV.G-14

If these pages from the proposed Draft EIR were indexed but omitted from City Planning's file additional time must be granted to allow for production of these documents, their review and public comment. Anything less results in City Planning facilitating developer's evasion of accountability on a critical issue entitled to significant mitigation: The creation of new hazards to public safety caused by additional traffic flooding public transportation access nodes, schools, shops and recreation areas arising from the foreseeable ingress and egress from the proposed Project and the real property concessions sought by the developer.

It is known currently that block grants are available through City Planning which include monies for mitigation which satisfies the consensus mandate to address particle emissions. The measure of concessions to the developer should be weighed against the dollar value in block grants available to City Planning concerning that certain real estate in the City of Los Angeles which is the subject of City Planning's file at issue in these comments. This is a way which provides for further execution of the City's living wage ordinance to include new jobs along the Alameda Corridor. If the developer were open to utilization of the land for green-waste processing, greencollar, living wage jobs would be created processing green waste, the City would reduce trash hauling costs (for the last 15 years the single largest cost in the City's budget), existing airborne emissions would be offset by the carbon provided by the

green waste itself, and an opportunity for the community to re-introduce thriving vegetation onto the otherwise fully built environment in and around that certain real estate which is the subject of City Planning's file at issue in these comments. More time is necessary to develop an analysis which shows an offset, matching up the jobs described in the proposed Draft EIR requiring 368 parking spaces, with the creation of living-wage, green collar jobs which are uniquely possible within that certain real estate which is the subject of City Planning's file at issue i these comments.

RESPONSE NO. E46-13

Your comment regarding comments from the Los Angeles County Metropolitan Transportation Authority (LACMTA) and the requirements of Zoning Information No. 1117 has been noted. Responses to these comments have been incorporated into Section IV.G, *Transportation/Traffic*, page IV.G-16, and Appendix IX, Addendum to Traffic Impact Analysis, in the Draft EIR. The Metro letter is included in Appendix II of the Draft EIR.

As indicated in the Addendum to Traffic Impact Analysis, the project traffic distribution indicates there will be a maximum of 22 trips (i.e., 15% of 140 inbound trips) will be on I-10 Freeway in the eastbound (west of Alameda Street) or westbound (east of Alameda Street) direction during the AM weekday peak hours. This project traffic volume of 22 trips is less than the 150 trip threshold of freeway monitoring location analysis requirement per Metropolitan Transportation Authority's Congestion Management Program (CMP) guidelines. As a result, no freeway monitoring location needed to be analyzed in the Traffic Impact Analysis (TIA). The I-10 Freeway has a directional capacity of 10,000 vehicles per hour or vph (i. e, 5 lanes @ 2,000 vph). The 22 directional trips added by this project represent an increase of 0.22%, which is not considered significant. This information is discussed further in Appendix IX, Addendum to Traffic Impact Analysis on page 7, and Section IV.G Traffic, on pages IV.G-2 through IV.G-3.

As discussed in Response to Comment No. E46-11, per the traffic study, a maximum of 28 vehicles will use the 41st Street at-grade crossing to travel outbound to the west during the PM peak hour, while a maximum of 7 vehicles will use 38th Place at-grade crossing to travel inbound from the east during the AM and PM peak hours. These crossings are currently used by existing traffic, and are adequately equipped with various warning and safety devices to alert and prevent traffic crossing during train movements across 41st Street and 38th Place, and allow safe crossings of traffic when there are no train movements. Therefore, no additional safety measures are deemed necessary at these at-grade rail crossings to accommodate traffic from the project. This information is included in Draft EIR Volume VI Appendix IX- Addendum to Traffic Study, page 9.

A discussed in Response to Comment No. E-46-1, the Traffic Study was appended to the Initial Study and hence is in Volume III of the Draft EIR, which is the initial study and its appendices. The tables mentioned in the comment regarding Existing Traffic Conditions, Freeway Segment Analysis, Freeway Off-Ramp Analysis, level of service descriptions and criteria, and Proposed Traffic Conditions for 2016 are in reference to the Addendum to the Traffic Impact Study, which is located in Volume VI, Appendix IX, to the Draft EIR.

A discussion of the use of block grant funding for amenities is beyond the scope of this document.

As noted in Metro's comment letter, the Metro Blue Line runs north-south along Long Beach Avenue just west of the project site. The nearest rail tracks are 50 feet from project site boundary, and therefore, project construction activities will occur within 100 feet of Metro rail structures. MTA will require submittal of construction drawing and calculations for review and approval prior to issuance of building permit.

Carbon offsets are typically purchased by businesses to comply with the California cap and trade program. The proposed project to construct a warehouse does not fit under the covered entities that must abide by the California cap and trade program (see Subarticle 3. § 95811 Covered Entities in the California Code of Regulations). The proposed project's construction and operational (including all mobile sources) emissions are well below the CARB recommended threshold of 25,000 metric tons of CO2e per year and is not a covered entity under the cap and trade program. (See Table IV.D-3, *Unmitigated CO_2 and CO_{2e} Emissions)* The proposed project's GHG emissions are expected to be less than significant and thus not require mitigation measures. As a result, green-waste processing to offset carbon impacts is not required for the proposed project.

COMMENT NO. E46-14

I am of those whose say that certain real estate which is the subject of City Planning's file is an opportunity for the City to address social, political and environmental impacts in District 9, and improve the livability in an area which has been a targeted sacrifice zone which has existed since 1994.

RESPONSE NO. E46-14

CEQA centers on whether a project may have a significant effect on the physical environment (CEQA Guidelines, 15064(d)). The purpose of an environmental impact report is to identify the significant effects on the environment of a project, to identify alternatives to the project, and to indicate the manner in which those significant effects can be mitigated or avoided (Pub. Res. Code, §21002.1 subd. (a)). Environmental justice is not considered an area of impact under CEQA, and CEQA does not ask that a project mitigate preexisting conditions. As noted in CEQA Guidelines Section 15064(b), the significance of an activity may vary with the environmental setting. Where there already is a high pollution burden on a community, the relevant question is whether an additional amount of pollution should be considered significant in light of the serious nature of the existing problem.[56] Existing conditions are covered in each corresponding impact category in order to adequately analyze project impacts in comparison to the no-project baseline conditions.

[56] Harris, Kamala D. 10 July 2012. *Environmental Justice at the Local and Regional Level: Legal Background*. Prepared by State of California Department of Justice. Available at: http://oag.ca.gov/sites/all/files/agweb/pdfs/environment/ej_fact_sheet.pdf

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LETTER NO. E47

Jack Neff Letter No. 2
P.O. Box 491272
Los Angeles, CA 90049

COMMENT NO. E47-1

Ms. Hewawitharana -This message is to request you to please graciously grant additional time for submission of public comments for the above-referenced Draft EIR, because the City's January 22, 2015 Notice only provided for a 43-day public comment period from Jan. 20-March 9, 2015, with an additional 5 days for mailing of the City's Notice. I do not know whether that could be judged a legally sufficient amount of time for public comments, and even if it is, it is an impractical amount of time because of the scope, size, volume and cost of the proposed project known as 4051 South Alameda Project, ENV-2012-920-EIR.

RESPONSE NO. E47-1

Your comment regarding the review period for the Draft EIR has been noted. The 45 day review period for the Draft EIR provides agencies and the public with an opportunity to comment on any concerns they may have on the proposed project. The Final EIR is required to address any concerns raised by the public or agencies. The letter dated March 9, 2015 from the State Office of Planning and Research acknowledges that the project has fulfilled CEQA requirements relative to the distribution of the Draft EIR to state agencies for review. According to Section 15105 of the State CEQA Guidelines, the public review period for a draft EIR shall not be less than 45 days. The Notice of Completion for the Draft EIR was filed on January 22, 2015, and the public review period ended on March 9, 2015, for a period of 46 days.

COMMENT NO. E47-2

The Draft EIR includes a 12-page Summary of Draft EIR, a 194-page Draft EIR and an appendix of over 2,400 pages, purporting to cover a proposed project of over 13 acres, with approximately a half-million square feet of new construction in a mixeduse, residential/industrial neighborhood. There is not enough time to address the large number of issues which may or may not be adequately addressed therein, including the developer's requests for variances, set-asides, set-backs, building design, traffic, parking, flow-through, water, remediation, seismic concerns, archeological elements, easements, vacations, fast-track permitting between overlapping jurisdictions, airborne emissions, existing environmental conditions, sensitive receptors among residents, current impacts, insurance, working conditions, pay rates and project authority. Even with all this paperwork, a cursory review of the Draft EIR and Appendices show there are huge gaps in the developer's Draft EIR and the readily apparent issues affecting this proposed project, and more time is necessary to adequately ask the questions necessary to establish a chain of responsibility for the proposed project.

RESPONSE NO. E47-2

As discussed in Response to Comment No. E47-1 above, the 45 day review period for the Draft EIR provides agencies and the public with an opportunity to comment on any concerns they may have on the proposed project. The Final EIR is required to address any concerns raised by the public or agencies. The letter dated March 9, 2015 from the State Office of Planning and Research acknowledges that the project has fulfilled CEQA requirements relative to the distribution of the Draft EIR to state agencies for review. According to Section 15105 of the State CEQA Guidelines, the public review period for a draft EIR shall

not be less than 45 days. The Notice of Completion for the Draft EIR was filed on January 22, 2015, and the public review period ended on March 9, 2015, for a period of 46 days.

COMMENT NO. E47-3

Please respond at your first opportunity because the putative deadline for public comments is this Monday, March 9, 2015. I will nevertheless be necessarily submitting truncated comments prior to that time, with plans to submit additional, supplemental comments if and when you acknowledge the need for additional time for submission public comments on this enormous project and its largely-unknown Draft EIR.

RESPONSE NO. E47-3

Your comment has been noted by the City. Your name and contact information has been included on the project distribution list and you will be informed of future opportunities for comment.

LETTER NO. E48

Ernesto Nevarez
52041 Panorama Dr.
Morongo Valley, CA 92256

COMMENT NO. E48-1

(Note: Please be sure to include my public comment for the record. My previous comment submitted could not be found in the records and I would hate to suspect that it was done intentionally.)

RESPONSE NO. E48-1

Your comment regarding your previous comment submitted for the Notice of Preparation has been noted. Your letter was inadvertently left out of Appendix II of the Draft EIR. However, your comments have been addressed in the body of the Draft EIR, consistent with the approach to all the comments from the scoping period. Your letter has been added to Appendix II as part of Section IV, *Corrections and Additions to the Draft EIR* of the Final EIR.

COMMENT NO. E48-2

Trucks

The term "trucks" are referred to in a very ambiguous manner and are not defined as to their character. The only information supplied is that 31 of the 342 trucks would be diesel. All trucks used for commercial transportation are diesel trucks with the exception of those fueled by LNG which account for as little as 2% of those used in the harbor. What will the other 311 trucks use as fuel? Again, heavy duty commercial trucks do not use gasoline! ! ! ! The *ITE Manual* estimates that this size warehouse will generate 342 daily truck trips and it didn't mean Ford Rangers or Toyota Tundras but class 8 tractors with gvwr of 80,000 pounds. Claiming that it will operate using 10% of the big rig traffic as used by competitors of similar size is ridiculous.

The study states that "The empirical data for the applicant's existing operations demonstrates that this is feasible, as the applicant is currently operating at less than 50 truck trips per day." Being "feasible" in the past by the applicant is not the same as being the practice in the future. Is it the intent of the applicant to develop the project and then operate the facility or will it rent it out or have a third party logistics firm (3PL) manage the operation? Will it use its' own fleet of trucks or will it utilize a motor carrier?

The Draft EIR provides for an alternative allowing for only 75 trucks a day, *Alternative C.* This option is unrealistic due to the competitive nature of the industry and as asserted in the ITE Manual. Below are numbers that I have calculated and which support the ITE estimate of 342 truck trips.

4 warehouse structures each approximately 100,000 square feet with high ceilings.
Less than 20 truck trips for each structure daily.
An intermodal container is 8 ft wide and 40 ft long, 320 square feet
This amounts to 6400 square feet of deliveries daily.
Warehouses stack cargo twice as high as that carried in containers creating the equivalent of 200,000 sq ft.
Based on these numbers cargo will sit at the warehouse for approximately 40 days!! !!
The 75 trucks per day is unrealistic due to the ***Just-in-Time*** (JIT) competitive nature of the industry and as asserted in the ITE Manual.

The 342 daily trips estimated using the *ITE Manual* is a lot more realistic! The competitive nature of the industry will not allow for a warehouse to survive by operation at 20% of capacity using the 75 trucks.

RESPONSE NO. E48-2

Your comment regarding the types of trucks proposed to be used for the proposed project, proposed project trip generation, and the type of fuel used by the trucks has been noted. The project applicant has specified that truck traffic will consist of cargo vans and box trucks only; no large diesel semi-tractor trucks are included in the daily traffic to the site. The addendum to the traffic study (October 2014, Appendix IX of the Draft EIR) shows that at 351 truck trips per day, per the ITE-recommended rate, the level of service at the surrounding intersections is not expected to be significantly impacted with the exception of the intersection of Alameda Street and East Washington Boulevard. Impacts at this intersection are expected to be at Level of Service (LOS) E.

Section VI *Alternatives* in the Draft EIR examines the following alternatives: Alternative A, No Project Alternative; Alternative B, Use of Clean Fuel Trucks; and Alternative C, Reduced Truck Operations. These alternatives provide ways to reduce the environmental impact of the proposed project. Under Alternative C, the project would not generate traffic at the ITE-recommended rate (i.e., 351 truck trips per day) which is based on surveys conducted nationally at typical warehouse facilities. The project applicant has indicated that truck trips associated with operation of the proposed project would not exceed 75 daily truck trips, which has therefore been analyzed as Alternative C of the Draft EIR. This assumption stems from the existing operations at the various facilities that would be consolidated in the proposed project. An analysis with this reduced number of truck trips shows that Alternative C will not have a significant impact at any of the study intersections. However, significant impacts will still remain at the intersection of Alameda Street and East Washington Boulevard using full ITE trip rates. Currently, there is a maximum of 33 trips/day total for the various existing facilities. The proposed project build out is not expected to significantly increase this number of trips; hence the 75 daily truck trips was taken as the conservative and economically viable assumption in Alternative C of the Draft EIR.

Per the approved EMFAC 2011 emissions model, the size vehicles anticipated could be either diesel or gasoline powered. EMFAC distributions specific to Los Angeles County show that 9 percent of these vehicles on average (i.e., 31 trucks per day) are expected to be diesel powered.

COMMENT NO. E48-3

Parking, Staging, and Queuing

The project will provide a total of 349 spaces on-site of which 245 spaces will be standardstalls (8'-4" x 18'), 96 spaces will be compact stalls ((7'-6" x 15') and 8 spaces will be accessible stalls for vans (17' x 19).

Where will the tractor/trailers park? A combined 70 feed long when adding 15 ft for the power unit.. Where will the 40 foot containers and 53 foot trailers be parked/stored? How much maneuvering space will be provided for backing up a trailer? The driver has to target a goal post not at the dock but at the front of the two adjoining units that he is trying to park between. This requires at minimum a distance of the adjoining 53 foot trailer parked at a dock plus an additional 70 feet for the tractor and trailer that is attempting to back up to the dock. (The tractor adds an additional 15 feet to the length) A total of 120 feet of unobstructed space is needed.

If these are "live" unloads or transloads the truck will always be connected to the trailer or container. If it is not a "live" unload then it will be drop. In such cases as soon as the container or trailer is unloaded then

it is moved immediately by a yard goat (utr) to a holding area to free up the dock for the next load. Where will these units be stored???

The project does not provide for a queuing lane. Trucks must report to an entry clerk and when multiple trucks arrive at once or one has problems with the paperwork a line develops. If there is no queuing lane provided by the facility the line will use the public street. Based on the figure of 342 truck trips a day in a 10 hour work day it means about 30 trucks an hour or one every two minutes. As explained earlier there will be only one entry gate for trucks due to the cost of entry clerks and bonded cargo rules. A paperwork delay at the gate of 10 minutes will mean a backup in the street of 5 units which means 350 feet of standing trucks!

Due to the lack of a staging area and queuing lane the company will not be able to enforce a 5 minute idling rule to cut down on emissions. The trucks will be off company property.

RESPONSE NO. E48-3

Your comments regarding parking, staging, and queuing have been noted. The project's traffic impacts are measured in terms of roadway lane configuration, geometric design characteristics and traffic volume capacity to handle the estimated volume of traffic during peak hours as well as daily traffic volumes. The roadway lane configuration and geometric characteristics are designed for all types of vehicles including trucks. It is the traffic capacity that is usually determined when development projects are proposed. It is a standard industry procedure to use a passenger car equivalent factor (recommended by Highway Capacity Manual published by Federal Highway Administration) to convert all types of vehicles into equivalent number of passenger cars in traffic capacity analysis. The turning radius requirement and load carrying capacity of trucks, including 70-feet long trucks weighing 80,000 lbs, are roadway design elements that are appropriately applied in the design of all City streets that allow truck traffic. It is the volume (i.e., hourly number of vehicles, including trucks, converted into passenger car equivalents using recommended conversion factors) that is used to determine traffic carrying capacity at the intersections and roadways. All development projects, such as the current project, are subject to this determination by the City Department of Transportation to review any potential project traffic impacts to the circulation system (Appendix XI of Draft EIR). Additionally, the queuing lane and staging area design are part of the project's site design requirement based on project specific traffic (including trucks) needs. The design must be reviewed and approved by the City Department of Transportation to insure adequacy of facilities. The proposed project provides adequate loading spaces in compliance with Los Angeles Municipal Code 12.21 A-4(g), 12.21 A-5(e), 12.21 A-5(i), 12.21 A-5(j), and 12.21 C-6. The loading bays are 55 feet deep, and the distance from the loading dock to the planter curb inside the project site is 120 feet, which is adequate to accommodate the maneuvering of 65-foot long tractor trailers to the loading areas on site. Queueing of trucks on the street will therefore not be required. Please see the revised Figure IV.G-1, *Access Driveways*, in Section IV, *Corrections and Additions to the Draft EIR*, for a diagram for maneuvering a 65-foot-long tractor trailer on-site.

COMMENT NO. E48-4

Traffic

The City of Los Angeles is prohibited from setting routes in interstate commerce.

The LOS and V/C ratios for the study intersections with related proposed project traffic and under proposed project conditions for 2016 are summarized in Table IV.G-7, *Proposed Project Traffic Conditions for 2016.* The results indicate that all the study intersections will continue to operate at a LOS D or better (i.e., within the range of acceptable thresholds of LOS A through D) during a.m. and p.m.

peak hours. It should be noted that with the assumption of 351 daily truck trips for the project, the study intersections, except the intersection of Alameda Street and Washington Boulevard, will show no significant impacts due to project traffic. However, in order to avoid significant impacts at the intersection of Alameda Street and Washington Boulevard, mitigation measures are required.

The study did not take into consideration the impact of 351 commercial heavy duty trucks but in their place took into consideration the impact of 702 passenger cars (based on the 2 cars for each truck factor). There is no comparison. The turning radius of a 70 foot-long big rig combo weighing 80,000 pounds cannot be compared to a two compact cars.

Warehouses are very secured especially if they are bonded warehouses. All warehouses have a clerk at an in-gate checking the delivery order/pick up order and exit paperwork. This is a requirement for bonded facilities and more than likely this will be a bonded facility. Which of the eight entrances will be the one for trucks with an in-gate clerk? It is very doubtful that it will have 8 entrances with 8 clerks! The lack of a queuing lane or staging area is a nightmare in the making.

RESPONSE NO. E48-4

See Response to Comment Nos. E48-2 and E48-3.

The Highway Capacity Manual (HCM) provides passenger car equivalence (PCE) factors to convert the number of trucks with varying number of axles into the number of 2-axle passenger cars in order to estimate roadway and intersection capacity impacts from these vehicles. These factors range from 1.5 (for 3-axle trucks) to 3.0 (for 5- or more-axle trucks). Considering the type and number of trucks for this project, an average PCE factor of 2.0 was deemed appropriate for conversion of truck trips into 2-axle passenger car trips for capacity analysis purposes. The proposed project provides adequate loading spaces in compliance with Los Angeles Municipal Code §§ 12.21 A-4(g), 12.21 A-5(e), 12.21 A-5(i), 12.21 A-5(j), and 12.21 C-6. The loading bays are 55 feet deep, and the distance from the loading dock to the planter curb inside the project site is 120 feet, which is adequate to accommodate the maneuvering of 65-foot long tractor trailers to the loading areas on site. Queueing of trucks on the street will therefore not be required. Please see the revised Figure IV.G-1, *Access Driveways*, in Section IV, *Corrections and Additions to the Draft EIR*, for a diagram for maneuvering a 65-foot-long tractor trailer on-site.

COMMENT NO. E48-5

Hazmat and HOS

Commercial trucks run on either diesel or LNG. Will LNG be stored at the facility? Will hazardous materials be transported to or from the facility? State law prohibits the parking of trucks carrying hazmat on public streets. Where on the facilities will there be a secured monitored yard with a hazmat response?

The FMCSA regulates the Hours of Service of drivers and requires a rest period of 10 hours between driving shifts. This facility is destined to be a regional distribution center which means that it will have trucks arriving for a load after having driven all day from somewhere else and will be required to take a 10 hour break. There are NO truck stops in the area and the facility does not provide for a holding yard. Worst of all most of the streets in the immediate are do not allow parking. The trucks will be parked in the adjacent area where ever they can, some with hazmat cargo. This includes parking near schools, churches, and residences outside of the immediate area.

RESPONSE NO. E48-5

Your comment regarding the storage of LNG being stored at the facility, the transport of hazardous materials to and from the facility, and the location of a secured monitored yard with a hazmat response has been noted. The proposed project includes the construction of a new industrial park consisting of four buildings that will occupy approximately 353,375 square feet of warehouse space, 112,745 square feet of office space, and 14,000 square feet of manufacturing space with surface parking lots. The proposed project will utilize materials that are typically used in the manufacture of clothing. The routine use, storage, and transport of hazardous materials was evaluated in Section IV.E of the Draft EIR.

The City acknowledges your concern regarding the length of driving shifts and the availability of nearby truck stops. Truck traffic generated by the project will be required to adhere to regulations regarding the length of driving shifts and rest periods. Furthermore, as detailed in Response to Comment Nos. E48-3 and E48-4, the project site design will have adequate parking, including for truck parking, queuing and stacking within the project site. Trucks will not need on-street parking for various maneuvers.

As documented in the Initial Study (Appendix III of the Draft EIR), there are no impacts from the routine transport, use or disposal of hazardous materials, and from release of hazardous materials to the environment. The proposed project site is currently vacant and there is currently no transport, use or disposal of hazardous materials related to the property. The historic uses of the proposed project site that may have involved the transport, use or disposal of hazardous materials include furniture manufacturing, appliance sales, rug cleaning, automotive service station, foundry, tool and die works, and metal products manufacturing. Given the industrial nature of much of the surrounding area, the presence of hazardous materials is likely on some of the adjoining sites. However, no recognized environmental conditions regarding the proposed project site being exposed to contamination migrating from off-site sources have been observed. The routine use and storage of chemicals is regulated pursuant to 42 U.S. Code Section 11021 that requires the facility owner to prepare a list of available Material Safety Data Sheets (MSDS). The proposed project would be required to comply with all relevant federal, state, and local statutes and regulations, including Hazardous Materials Business Plan (HMBP) requirements which contains basic information on the location, type, quantity, and health risks of hazardous materials stored, used, or disposed of by businesses operating in the state.

To comply with the HMBP requirements, the project will identify existing safety hazards that could cause or contribute to an accidental spill or release, and suggest preventive measures designed to minimize the risk of a spill or release of hazardous materials. Each business shall prepare an HMBP using the California Environmental Reporting System (CERS) if that business uses, handles, or stores a hazardous material (including hazardous waste) or an extremely hazardous material in quantities greater than or equal to the following:

- 500 pounds of a solid substance
- 55 gallons of a liquid
- 200 cubic feet of compressed gas
- A hazardous compressed gas in any amount (highly toxic gases with a Threshold Limit Value (TLV) of 10 parts per million or less)
- Extremely hazardous substances in threshold planning quantities as defined in 40CFR Part 355

COMMENT NO. E48-6

The information provided for the project is ambiguous, incomplete, and erroneous so please do not approve it.

RESPONSE NO. E48-6

Your comment has been noted by the City. Your concerns will be taken into consideration by the decision makers prior to taking action on the proposed project.

LETTER NO. E49

Ernesto Nevarez
52041 Panorama Dr.
Morongo Valley, CA 92256

LETTER NO. E49

COMMENT NO. E49-1

Please make sure that this is included in the public record. Last time I sent something it doesn't show up. I did a control-F for my name and couldn't find my submission. I'm sending a "cc" of this transmission to the SCF for documentation that I did send it so please don't overlook including it. An unsigned PDF copy "submission" is also being included because the font resolution is better quality.

RESPONSE NO. E49-1

Your comment regarding your previous comments submitted for the Notice of Preparation has been noted. Your letter was inadvertently left out of Appendix II of the Draft EIR. However, your comments have been addressed in the body of the Draft EIR, consistent with the approach to all the comments from the scoping period. Your letter will be added to Appendix II as part of the Corrections and Additions section of the Final EIR. Your current letter is included above as Letter No. E48.

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LETTER NO. E50

Senorina Nieva

COMMENT NO. E50-1

Hello, my name is Senorina Nieva. I work for IMPACT. I have lived in California for 25 years and 5 years with the company. I am happy (content) working at the company. I am grateful for the work and thankful for the opportunity to work here. Thank you. We have an excellent boss.

RESPONSE NO. E50-1

Your comment to the proposed project has been noted. Your comment will be taken into consideration by the decision makers prior to taking action on the proposed project.

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LETTER NO. E51

Erika Perrez

COMMENT NO. E51-1

I, Erika Perez, have worked with Mr. Tony for 3 years. In these few years, I haven't had any problems. He is honest with his employees and does what it takes to keep us employed. I don't have to say more about him other than he is good to us and I am very happy here. If you have any questions, please dial (323) 245-3050.

RESPONSE NO. E51-1

Your comment on the proposed project has been noted. Your concerns will be taken into consideration by the decision makers prior to taking action on the proposed project.

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LETTER NO. E52

Linda Piera-Avila

COMMENT NO. E52-1

Please do not accept the Draft EIR in its current form. It goes against the Open Space element in the City's master plan by opting against preservation and restoration of green open space in favor of more industrial uses. The highest use of this parcel would be to return it to the community as an urban garden with recreational opportunities.

RESPONSE NO. E52-1

Your comments regarding the community value of gardens and the consistency of the project with the City's General Plan Open Space Element have been noted. Section 15126.6 of the CEQA Guidelines requires an EIR to describe a range of reasonable alternatives to a project or to the location of a project that would feasibly attain most of the basic objectives of a project but would avoid or substantially lessen any of the significant effects of a project, and evaluate the comparative merits of the alternatives. The discussion of alternatives, however, need not be exhaustive, but rather the discussion must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. An EIR is not required to consider alternatives that are deemed "infeasible." In developing alternatives, the following factors are considered: (i) ability to meet most of the basic project objectives, (ii) feasibility, or (iii) ability to avoid or substantially lessen significant environmental impacts.

As set forth in Section VI of the Draft EIR on pages VI-3 to VI-4, the Community Garden alternative and Park and Recreational Use alternative, requested through public comments, considered development of the project for an alternate land use, specifically a community garden or park. However, these alternatives were withdrawn from further analysis, because they do not meet the basic project objectives:

- A community garden or park would not attain the objective of providing a minimum of 480,000 square feet of light industrial space, consistent with the existing land use designation and zoning.

- A community garden or park would not provide light manufacturing jobs within 3 miles of an existing garment manufacturing labor force in the Southeast Los Angeles Community Plan Area.

- A community garden or park would not allow for development of an industrial park that is along the Alameda Corridor to take advantage of distribution efficiency opportunities.

- A community garden or park would not facilitate the ability of existing garment labor force, located in close proximity to the project site to utilize existing public transit system and other multi-modal transportation opportunities in vicinity of proposed project.

- A community garden or park would not preserve and/or redevelop the industrial sector of the Southeast Los Angeles Community Plan Area to accommodate emerging technologies, thus providing an enhanced employment base for the Community Plan Area's population.

- A community garden or park would not benefit the Southeast Los Angeles Community Plan area population as economic stimulation through employment opportunities, attracting commercial and industrial tenants to the area, and providing tax revenue for the City would not occur.

The proposed use of the property as light manufacturing is consistent with land use planning objectives articulated in the Southeast Los Angeles Community Plan. The City of Los Angeles Southeast Los Angeles Community Plan has designated the project site as light industrial. The land use designation discourages nonindustrial uses and uses that compromise job-producing potential. Plan Goal 3 supports sufficient land for a variety of industrial uses with maximum employment opportunities, which are safe for the environment and the work force, and which have minimal adverse impacts on adjacent uses. The South East Los Angeles Community Plan further supports the retention and redevelopment of the industrial sector through Objective 3-1, Policy 3-1.1, and Objective 3-2, Policy 3-2.1:

> **Objective 3-1** To provide for existing and future industrial uses which contribute job opportunities for residents and which minimize environmental and visual impacts to the community.
>
> **Policies 3-1.1** Designate lands for the continuation of existing industry and development of new industrial parks, research and development uses, light manufacturing, and similar uses which provide employment opportunities.
>
> **Objective 3-2** To retain industrial plan designations to maintain the industrial employment base for community residents and to increase it whenever possible.
>
> **Policies 3-2.1** The significant, large industrially planned parcels located in predominantly industrial areas associated with the railroad transportation facilities along Alameda and in the Slauson area should be protected from development by other uses which do not support the industrial base of the community, and the City.

The Southeast Los Angeles Community Plan's open space goals and objectives support the preservation of existing open space and the development of new open space, in balance with new development, to serve the recreational, environmental, health and safety needs of the community. The objectives further note that the "Plan Map designates lands for open spaces including parklands." As noted above, the project site is in an industrial corridor adjacent to the Alameda Corridor rail line, and it is not designated for open space on the plan map. The area surrounding the proposed project site is developed almost exclusively with light and heavy industrial uses, with limited small lot single family residential homes intermixed with light/industrial warehouse uses to the south and residential areas farther to the west. The Alameda Corridor rail line is located directly to the east and runs below grade in the project area, and also includes the Southern Pacific Railroad right-of-way across South Alameda Street. The Metro Blue Line light rail is located immediately to the west of the project site. The nearest designated open space is the Ross Snyder Recreation Center, located 0.2 mile west of the proposed project site.

The applicant acknowledges the former interim use of the project site as a community garden that occurred under previous ownership. However, the use was discontinued in 2006, and the project site is currently vacant underutilized land in an industrially zoned area. Appendix XII and Section III.E of the Draft EIR provide details of a 2003 settlement agreement between the prior owner and the City of Los Angeles to dedicate 2.6 acres of the property for maintenance of a park for recreation and park purposes, and subsequent amendment of the agreement to allow the proposed project to be developed. This amendment for the cash pledge provided the City or a nonprofit organization with the funds to dedicate a park in a more appropriate location than the project site, which is industrially zoned and isolated to the

west and east by major rail lines. The City Council accordingly determined that establishment of an active use park on the property is inappropriate due to the property's location in an industrial corridor, and authorized execution of a Cash Pledge Agreement whereby a payment in the amount of $3,573,365 was made to improve and provide recreational and park facilities at more suitable alternate sites in the vicinity of the property (see Report of the Chief Legislative Analyst, Ordinance No. 181949, and City Council Motion included in Appendix XII of the Draft EIR). The value of the cash pledge was determined on the basis of the pro rata value of the 2.6 acres to be set aside for recreational purposes pursuant to the settlement agreement relative to the overall purchase price of the project site. For further information on the site background and cash pledge agreement for park and recreational uses, please see pages IV-3 and IV-4 of Section IV, *Corrections and Additions to the Draft EIR* section of this Final EIR, and pages III-6 and III-7 and Appendix XII of the Draft EIR.

As stated in the Draft EIR and summarized above, the project's cash pledge agreement will contribute to open space in the City in a more suitable location, while the project site would be developed consistent with its Community Plan designation, goals and policies, and the project objectives. As a result, the project is consistent with the Open Space Element. The Open Space Element consists primarily of general aspirational citywide policies and programs encouraging the provision of open space. The commenter has not specified in what way the project would be inconsistent with this General Plan Element. However, the project would be consistent with the South East Los Angeles Community Plan goals, objectives and land use designation as specified above in this Response to Comment No. E52-1, and further would contribute to open space amenities nearby, and, as such is considered substantially consistent with the general intent of the Open Space Element.

COMMENT NO. E52-2

Additionally, the cumulative impacts of more diesel truck trips required for the warehouse activity will only add to the area's already unacceptable level of air and noise pollution and decrease pedestrian and automobile safety by increasing traffic congestion adjacent to a residential area and the Metro Blue Line.

RESPONSE NO. E52-2

Your comment regarding air quality and noise impacts has been noted. There are 11 projects expected to be implemented within a 2-mile radius of the proposed project during the construction period of the proposed project. Cumulative impactsto air quality are expected to be below the level of significance with the implementation of Mitigation Measures Air-1 to Air-7, which are listed on pages IV.B-23 and IV.B-24 in the Draft EIR and listed here:

Air-1
During the construction phase of the project, the project applicant shall apply soil stabilizers for all unpaved roads (80 percent reduction in PM2.5 and PM10 emissions).

Air-2
During the construction phase of the project, the project applicant shall water exposed areas three times a day (61 percent reduction in PM2.5 and PM10 emissions).

Air-3
During the construction phase of the project, the project applicant shall ensure that vehicular speeds are reduced to 15 miles per hour on unpaved roads.

Air-4

The project applicant shall establish incentives for increased transit frequency~~.~~ in compliance with the transportation demand management and trip reduction measures set forth in Section 12.26J of the Los Angeles Municipal Code, which include the following requirements for non-residential projects with more than 100,000 square feet of floor area.

(a) Development in excess of 25,000 square feet of gross floor area. The owner shall provide a bulletin board, display case, or kiosk (displaying transportation information) where the greatest number of employees are likely to see it. The transportation information displayed should include, but is not limited to, the following:

(1) Current routes and schedules for public transit serving the site;

(2) Telephone numbers for referrals on transportation information including numbers for the regional ridesharing agency and local transit operations;

(3) Ridesharing promotion material supplied by commuter-oriented organizations;

(4) Regional/local bicycle route and facility information;

(5) A listing of on-site services or facilities which are available for carpoolers, vanpoolers, bicyclists, and transit riders.

(b) Development in excess of 50,000 square feet of gross floor area. The owner shall comply with Paragraph (a) above and in addition shall provide:

(1) A designated parking area for employee carpools and vanpools as close as practical to the main pedestrian entrance(s) of the building(s). This area shall include at least ten percent of the parking spaces required for the site. The spaces shall be signed and striped sufficient to meet the employee demand for such spaces. The carpool/vanpool parking area shall be identified on the driveway and circulation plan upon application for a building permit;

(2) One permanent, clearly identified (signed and striped) carpool/vanpool parking space for the first 50,000 to 100,000 square feet of gross floor area and one additional permanent, clearly identified (signed and striped) carpool/vanpool parking space for any development over 100,000 square feet of gross floor area;

(3) Parking spaces clearly identified (signed and striped) shall be provided in the designated carpool/vanpool parking area at any time during the building's occupancy sufficient to meet employee demand for such spaces. Absent such demand, parking spaces within the designated carpool/vanpool parking area may be used by other vehicles;

(4) No signed and striped parking spaces for carpool/vanpool parking shall displace any handicapped parking;

(5) A statement that preferential carpool/vanpool spaces are available on-site and a description of the method for obtaining permission to use such spaces shall be included on the required transportation information board;

(6) A minimum vertical clearance of 7 feet 2 inches shall be provided for all parking spaces and accessways used by vanpool vehicles when located within a parking structure;

(7) Bicycle parking shall be provided in conformance with Section 12.21A16 of this Code.

(c) Development in excess of 100,000 square feet of gross floor area. The owner shall comply with Paragraphs (a) and (b) above and shall provide:

(1) A safe and convenient area in which carpool/vanpool vehicles may load and unload passengers other than in their assigned parking area;

(2) Sidewalks or other designated pathways following direct and safe routes from the external pedestrian circulation system to each building in the development;

(3) If determined necessary by the City to mitigate the project impact, bus stop improvements shall be provided. The City will consult with the local bus service providers in determining appropriate improvements. When locating bus stops and/or planning building entrances, entrances shall be designed to provide safe and efficient access to nearby transit stations/stops;

(4) Safe and convenient access from the external circulation system to bicycle parking facilities on-site.

Air-5
The project applicant shall improve the pedestrian network for the project site to internally link all uses and connect with existing or planned external streets and pedestrian facilities contiguous with the project site. The project applicant shall identify street trees and streetscape improvements to connect site access points to nearby transit and bicycle facilities.

Air-6
The project applicant shall provide traffic calming measures through street improvements. The applicant will be dedicating additional right-of-way along 41st Street, Alameda Street, and Martin Luther King, Jr. Boulevard. In connection with the street dedications and development of the proposed project, the applicant will be upgrading existing sidewalks, curb and gutter, as well as street trees, street lighting, and street furniture around the entire perimeter of the property in consultation with the City Department of Transportation and Department of Public Works. Upgrades to the existing sidewalks will require new curb cuts and crosswalks and the replacement of existing traffic signals at intersections. Additional traffic control devices will be installed as necessary and required to facilitate safe traffic circulation in and around the proposed project site.

Air-7
The project applicant shall ensure low VOC paint is applied for interior and exterior uses [250 EF (g/L)].

Construction emissions are shown in Table IV.B-8, *Unmitigated Estimated Daily Regional Construction Emissions*, and are only significant for PM_{10}. Operational emissions are shown in Table IV.B-9, *Unmitigated Estimated Daily Operational Emissions*, and are not significant for any of the criteria air pollutants. The PM_{10} emissions from construction will be mitigated to below the level of significance with the implementation of the seven mitigation measures.

The primary sources of TAC emissions associated with the proposed project's operations would be limited to DPM from delivery trucks. The results of the TAC analysis are shown in Table IV.B-11, Summary of DPM Health Impact Results. As described in Section IV.B (pages IV.B-22) of the Draft EIR,

the resulting maximum potential cancer risk is 0.3 in a million, which is only 3 percent of the cancer risk threshold of 10 in a million as set by SCAQMD Rule 1401.

Diesel emissions are particularly examined in the Health Risk Assessment (HRA) found in Appendix V in Volume IV of the Draft EIR. The Draft EIR concluded that noise from the proposed project would have a less than significant impact. Please refer to the Initial Study in Appendix III of this Draft EIR, and to Appendix IS-1, Noise Technical Report, for further information. Thank you for your comment regarding cumulative air quality impacts. There are 11 projects expected to be implemented within a 2-mile radius of the proposed project during the construction period of the proposed project. Cumulative impacts to air quality are expected to be below the level of significance with the implementation of Mitigation Measures Air-1 to Air-7 in the Draft EIR.

With regard to cumulative noise impacts, the City's Noise Regulation states that the baseline ambient noise shall be the actual measured ambient noise level or the City's presumed ambient noise level, whichever is greater. As shown in Section 2.7 of the Noise Technical Report and in the Impact Analysis contained in Section 12 Noise of the Initial Study, the proposed project would not exceed the thresholds set forth in the City's CEQA Threshold Guide and thus would be in compliance with the City's noise regulation.

Your comment addressing traffic congestion and safety has been noted. From the Addendum to the Traffic Impact Study prepared for Sage Strategies in October of 2014 (Appendix IX in Volume VI of Draft EIR),[57] all study intersections would operate at an acceptable LOS (at LOS A through D) with the exception of traffic impacts at the intersection of Alameda Street and East Washington Boulevard during the PM peak hour. A project's traffic impact is determined to be significant if the increase in V/C is 0.04 or more at LOS C, or 0.02 or more at LOS D, or 0.01 or more at LOS E and F.

Significant impacts occur at the intersection of Alameda Street and East Washington Boulevard using 351 truck trips per day based on ITE trip generation rates. Section VI *Alternatives* in the Draft EIR examines the following alternatives: Alternative A, No Project Alternative; Alternative B, Use of Clean Fuel Trucks; and Alternative C, Reduced Truck Operations. These alternatives provide ways to reduce the environmental impact of the proposed project. Under Alternative C, the project would not generate traffic at the ITE-recommended rate (i.e., 351 truck trips per day) which is based on surveys conducted nationally at typical warehouse facilities. The project applicant has indicated that truck trips associated with operation of the proposed project would not exceed 75 daily truck trips, which has therefore been analyzed as Alternative C of the Draft EIR. However, significant impacts will still remain at the intersection of Alameda Street and East Washington Boulevard using full ITE trip rates. Currently, there is a maximum of 33 trips/day total for the various existing facilities. The proposed project build out is not expected to significantly increase this number of trips; hence the 75 daily truck trips was taken as the assumption in Alternative C of the Draft EIR. An analysis with this reduced number of truck trips shows that Alternative C will not have a significant impact at any of the study intersections.

Regarding rail crossing and freeway safety, according to the Addendum to the Traffic Impact Study in October 2014 (Appendix IX in Volume VI of the Draft EIR, page 9).

> *The project's traffic distribution shows that a maximum of 28 vehicles will use the 41st Street at-grade crossing to travel outbound to the west during the PM peak hour, while a maximum of 7 vehicles will use 38th Place at-grade crossing to travel inbound from the east during the AM and PM peak hours. These crossings are currently used by existing traffic, and are adequately*

[57] Sage Strategies, LLC. October 3, 2014. Appendix XI. Addendum to Traffic Impact Study. Prepared by Traffic Design, Inc.

equipped with various warning and safety devices to alert and prevent traffic crossing during train movements across 41st Street and 38th Place, and allow safe crossings of traffic when there are no train movements. Therefore, no additional safety measures are deemed necessary at these at-grade rail crossings to accommodate traffic from the project...

...The analysis also indicates that the project trips will not exceed the thresholds of requirements for Metro's Congestion Management Program (CMP) analysis. Similarly, the thresholds of requirements for Caltrans District 7's freeway segment and off-ramp analysis will not be exceeded. Therefore, the project will not have a significant impact on the CMP network and freeway segments or off-ramps. The two at-grade rail crossings near the project sites will be used by the project traffic; however, these rail crossing are currently adequately equipped with warning and safety devices.

COMMENT NO. E52-3

The DEIR's conclusion that community gardens do not carry local community value and economic benefits is insensitive to communities of color. For the people of South LA, access to healthy food – broccoli, asparagus, tomatoes (as opposed to chips, sodas, and candy), as well as skills to produce this food -- are matters of life and death, of sight and blindness. In essence, the DEIR's conclusion negating community value of organic gardens sends a Marie Antoinette message – not let them eat cake, but let them feast on salt, sugar, and fat while other more fortunate areas of Los Angeles enjoy the privilege of eating healthy food and living robust lives.

RESPONSE NO. E52-3

Your comment regarding sensitivity to communities of color, the local benefit and value of community gardens, and access to healthy food has been noted. Your concerns will be taken into consideration by the decision-makers prior to taking action on the proposed project.

As discussed in Response to Comment No. E52-1, above, the alternatives for a community garden or park/recreation use were withdrawn from further analysis as they would not meet the basic objectives of the project. The City entered into a cash pledge agreement with the prior owner to dedicate 2.6 acres of the property for maintenance of a park for recreation and park purposes, and subsequent amendment of the agreement to allow the proposed project to be developed. This amendment for a cash pledge provided the City or a nonprofit organization with the funds to dedicate a park in an alternative site more suitable for the community's agricultural use and park/recreational development functions. In order to satisfy the City's requirement for recreational use for the community, the City adopted Ordinance No. 181949 on November 23, 2011,[58] whereby funds were contributed to park/recreational development at more suitable alternative sites. As stated in the Draft EIR and summarized above, the project's cash pledge agreement will contribute to open space in the City in a more suitable location, while the project site would be developed consistent with its Community Plan designation, goals and policies, and the project objectives.

COMMENT NO. E52-4

I was equally appalled to read that the DEIR fails to recognize the community value in using the land for recreational purposes. Are we to believe there is a positive net gain in setting aside the land for polluting industrial use, for possible release of carcinogens and other toxins, rather than giving the children of Los

[58] Ordinance No. 181949, Report of the Chief Legislative Analyst for Council File No. 11-1524, and Motion, dated February 24, 2012.

Angeles a place to play and run and get in shape? This is a shameful conclusion, truly embarrassing to read.

RESPONSE NO. E52-4

Your comment regarding the value in using the land for recreational purposes has been noted. The commenter's opinion on the conclusions of the Draft EIR has been noted and forwarded to the decision makers for their consideration prior to taking action on the proposed project. As detailed in Response to Comment Nos. E52-1 and E52-2, the project's cash pledge agreement will contribute to open space in the City in a more suitable location, while the project site would be developed consistent with its Community Plan designation, goals and policies, and the project objectives.

The Existing Conditions section in Section IV.B *Air Quality* of the Draft EIR includes ambient air quality data gathered from the local air quality monitoring stations. The average concentrations and days above the standard for each criteria air pollutant are listed in Table IV.B-6 *Summary of 2010-2012 Ambient Air Quality Data in the Proposed Project Vicinity* on page IV.B-11 of the Draft EIR. The Air Quality impact analysis relative to the impacts of the proposed project is further detailed below, and is located in Section IV.B *Air Quality* of the Draft EIR. In the Draft EIR, sensitive receptors are defined on page IV.B-11. There are two maps showing their locations: Figure IV.B-1 *Sensitive Receptors* and Figure IV. B-2 *Receptor Grid and Sensitive Receptors*.

Construction emissions are shown in Table IV.B-8, *Unmitigated Estimated Daily Regional Construction Emissions,* and are only significant for PM_{10}. Operational emissions are shown in Table IV.B-9, *Unmitigated Estimated Daily Operational Emissions*, and are not significant for any of the criteria air pollutants. The PM_{10} emissions from construction will be mitigated to below the level of significance with the implementation of the seven mitigation measures.

The primary sources of TAC emissions associated with the proposed project's operations would be limited to DPM from delivery trucks. The results of the TAC analysis are shown in Table IV.B-11, Summary of DPM Health Impact Results. As described in Section IV.B (pages IV.B-22) of the Draft EIR, the resulting maximum potential cancer risk is 0.3 in a million, which is only 3 percent of the cancer risk threshold of 10 in a million as set by SCAQMD Rule 1401.

Diesel emissions are particularly examined in the Health Risk Assessment (HRA) found in Appendix V in Volume IV of the Draft EIR. The Draft EIR concluded that noise from the proposed project would have a less than significant impact. Please refer to the Initial Study in Appendix III of this Draft EIR, and to Appendix IS-1, Noise Technical Report, for further information. Cumulative air quality impacts are further discussed on pages IV.B-22 and IV.B-23 of the Draft EIR.

The Department of Toxic Substances Control (DTSC) has reviewed the site characterization and health risk assessment for the site and has concluded that the site is suitable for Industrial/Commercial use, and that future development or rezoning of the property for other than Industrial/Commercial use will require additional analysis and risk evaluation by DTSC to determine the suitability of the site for such use (included as Appendix N to the Final EIR).[59]

[59] Department of Toxic Substances Control. 22 December 2015. Letter from Brownfields and Environmental Restoration Program—Chatsworth Office, Haissam Y. Salloum, Senior Engineer, to City of Los Angeles, Department of City Planning, William Lamborn.

COMMENT NO. E52-5

Please re-do this DEIR to take into consideration the abundant community values in using this land for gardening and recreation.

RESPONSE NO. E52-5

Your comment has been noted. As detailed in Response to Comment Nos. E52-1 through E52-4, the alternatives analysis withdrew the community garden and recreation alternatives as being infeasible as they did not meet basic objectives of the project. The project's cash pledge agreement will contribute to open space in the City in a more suitable location, while the project site would be developed consistent with its Community Plan designation, goals and policies, and the project objectives.

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LETTER NO. E53

Efrain Piñon

COMMENT NO. E53-1

My name is Efrain. I have lived in Los Angeles for 25 years. My position is that of a machine operator. I have worked for different companies but I have been working for IMPACT for 4 years. I have no complaints since there is plenty of work and the owner of the company is very open and approachable to his employees. On my behalf, I am grateful with the company for generating employment.

RESPONSE NO. E53-1

Your comment on the proposed project has been noted. Your concerns will be taken into consideration by the decision makers prior to taking action on the proposed project.

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LETTER NO. E54

John Quigley

COMMENT NO. E54-1

Please do not accept the Draft EIR in its current form. It goes against the Open Space element in the City's master plan by opting against preservation and restoration of green open space in favor of more industrial uses. The highest use of this parcel would be to return it to the community as an urban garden with recreational opportunities.

RESPONSE NO. E54-1

Your comment regarding the consistency of the project with the City's General Plan Open Space Element has been noted. Section 15126.6 of the CEQA Guidelines requires an EIR to describe a range of reasonable alternatives to a project or to the location of a project that would feasibly attain most of the basic objectives of a project but would avoid or substantially lessen any of the significant effects of a project, and evaluate the comparative merits of the alternatives. The discussion of alternatives, however, need not be exhaustive, but rather the discussion must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. An EIR is not required to consider alternatives that are deemed "infeasible." In developing alternatives, the following factors are considered: (i) ability to meet most of the basic project objectives, (ii) feasibility, or (iii) ability to avoid or substantially lessen significant environmental impacts.

As set forth in Section VI of the Draft EIR on pages VI-3 to VI-4, the Community Garden alternative, requested through public comments, considered development of the project for an alternate land use, specifically a community garden. However, this alternative was withdrawn from consideration as it does not meet the basic project objectives:

- A community garden or park would not attain the objective of providing a minimum of 480,000 square feet of light industrial space, consistent with the existing land use designation and zoning.
- A community garden or park would not provide light manufacturing jobs within 3 miles of an existing garment manufacturing labor force in the Southeast Los Angeles Community Plan Area.
- A community garden or park would not allow for development of an industrial park that is along the Alameda Corridor to take advantage of distribution efficiency opportunities.
- A community garden or park would not facilitate the ability of existing garment labor force, located in close proximity to the project site to utilize existing public transit system and other multi-modal transportation opportunities in vicinity of proposed project.
- A community garden or park would not preserve and/or redevelop the industrial sector of the Southeast Los Angeles Community Plan Area to accommodate emerging technologies, thus providing an enhanced employment base for the Community Plan Area's population.

- A community garden or park would not benefit the Southeast Los Angeles Community Plan area population as economic stimulation through employment opportunities, attracting commercial and industrial tenants to the area, and providing tax revenue for the City would not occur.

The proposed use of the property as light manufacturing is consistent with land use planning objectives articulated in the Southeast Los Angeles Community Plan. The City of Los Angeles Southeast Los Angeles Community Plan has designated the project site as light industrial. The land use designation discourages nonindustrial uses and uses that compromise job-producing potential. Plan Goal 3 supports sufficient land for a variety of industrial uses with maximum employment opportunities, which are safe for the environment and the work force, and which have minimal adverse impacts on adjacent uses. The South East Los Angeles Community Plan further supports the retention and redevelopment of the industrial sector through Objective 3-1, Policy 3-1.1, and Objective 3-2, Policy 3-2.1:

> **Objective 3-1** To provide for existing and future industrial uses which contribute job opportunities for residents and which minimize environmental and visual impacts to the community.
>
> **Policies 3-1.1** Designate lands for the continuation of existing industry and development of new industrial parks, research and development uses, light manufacturing, and similar uses which provide employment opportunities.
>
> **Objective 3-2** To retain industrial plan designations to maintain the industrial employment base for community residents and to increase it whenever possible.
>
> **Policies 3-2.1** The significant, large industrially planned parcels located in predominantly industrial areas associated with the railroad transportation facilities along Alameda and in the Slauson area should be protected from development by other uses which do not support the industrial base of the community, and the City.

The Southeast Los Angeles Community Plan's open space goals and objectives support the preservation of existing open space and the development of new open space, in balance with new development, to serve the recreational, environmental, health and safety needs of the community. The objectives further note that the "Plan Map designates lands for open spaces including parklands." As noted above, the project site is in an industrial corridor adjacent to the Alameda Corridor rail line, and it is not designated for open space on the plan map. The area surrounding the proposed project site is developed almost exclusively with light and heavy industrial uses, with limited small lot single family residential homes intermixed with light/industrial warehouse uses to the south and residential areas farther to the west. The Alameda Corridor rail line is located directly to the east and runs below grade in the project area, and also includes the Southern Pacific Railroad right-of-way across South Alameda Street. The Metro Blue Line light rail is located immediately to the west of the project site. The nearest designated open space is the Ross Snyder Recreation Center, located 0.2 mile west of the proposed project site.

The applicant acknowledges the former interim use of the project site as a community garden that occurred under previous ownership. However, the use was discontinued in 2006, and the project site is currently vacant underutilized land in an industrially zoned area. Appendix XII and Section III.E of the Draft EIR provide details of a 2003 settlement agreement between the prior owner and the City of Los Angeles to dedicate 2.6 acres of the property for maintenance of a park for recreation and park purposes, and subsequent amendment of the agreement to allow the proposed project to be developed. This amendment for the cash pledge provided the City or a nonprofit organization with the funds to dedicate a park in a more appropriate location than the project site, which is industrially zoned and isolated to the

west and east by major rail lines. The City Council accordingly determined that establishment of an active use park on the property is inappropriate due to the property's location in an industrial corridor, and authorized execution of a Cash Pledge Agreement whereby a payment in the amount of $3,573,365 was made to improve and provide recreational and park facilities at more suitable alternate sites in the vicinity of the property (see Report of the Chief Legislative Analyst, Ordinance No. 181949, and City Council Motion included in Appendix XII of the Draft EIR). The value of the cash pledge was determined on the basis of the pro rata value of the 2.6 acres to be set aside for recreational purposes pursuant to the settlement agreement relative to the overall purchase price of the project site. For further information on the site background and cash pledge agreement for park and recreational uses, please see pages IV-3 and IV-4 of the Corrections and Additions section of this Final EIR, and pages III-6 and III-7 and Appendix XII of the Draft EIR.

As stated in the Draft EIR and summarized above, the project's cash pledge agreement will contribute to open space in the City in a more suitable location, while the project site would be developed consistent with its Community Plan designation, goals and policies, and the project objectives. The Open Space Element consists primarily of general aspirational citywide policies and programs encouraging the provision of open space. The commenter has not specified in what way the project would be inconsistent with this General Plan Element. However, the project would be consistent with the South East Los Angeles Community Plan goals, objectives and land use designation as specified above in this Response to Comment No. E54-1, and further would contribute to open space amenities nearby, and, as such is considered substantially consistent with the general intent of the Open Space Element.

COMMENT NO. E54-2

Additionally, the cumulative impacts of more diesel truck trips required for the warehouse activity will only add to the area's already unacceptable level of air and noise pollution and decrease pedestrian and automobile safety by increasing traffic congestion adjacent to a residential area and the Metro Blue Line.

RESPONSE NO. E54-2

Your comment regarding cumulative air quality impacts has been noted. There are 11 projects expected to be implemented within a 2-mile radius of the proposed project during the construction period of the proposed project. Cumulative impacts to air quality are expected to be below the level of significance with the implementation of Mitigation Measures Air-1 to Air-7 in the Draft EIR.

Air-1
During the construction phase of the project, the project applicant shall apply soil stabilizers for all unpaved roads (80 percent reduction in PM2.5 and PM10 emissions).

Air-2
During the construction phase of the project, the project applicant shall water exposed areas three times a day (61 percent reduction in PM2.5 and PM10 emissions).

Air-3
During the construction phase of the project, the project applicant shall ensure that vehicular speeds are reduced to 15 miles per hour on unpaved roads.

Air-4
The project applicant shall establish incentives for increased transit frequency- in compliance with the transportation demand management and trip reduction measures set forth in Section

12.26J of the Los Angeles Municipal Code, which include the following requirements for non-residential projects with more than 100,000 square feet of floor area.

(a) Development in excess of 25,000 square feet of gross floor area. The owner shall provide a bulletin board, display case, or kiosk (displaying transportation information) where the greatest number of employees are likely to see it. The transportation information displayed should include, but is not limited to, the following:

(1) Current routes and schedules for public transit serving the site;

(2) Telephone numbers for referrals on transportation information including numbers for the regional ridesharing agency and local transit operations;

(3) Ridesharing promotion material supplied by commuter-oriented organizations;

(4) Regional/local bicycle route and facility information;

(5) A listing of on-site services or facilities which are available for carpoolers, vanpoolers, bicyclists, and transit riders.

(b) Development in excess of 50,000 square feet of gross floor area. The owner shall comply with Paragraph (a) above and in addition shall provide:

(1) A designated parking area for employee carpools and vanpools as close as practical to the main pedestrian entrance(s) of the building(s). This area shall include at least ten percent of the parking spaces required for the site. The spaces shall be signed and striped sufficient to meet the employee demand for such spaces. The carpool/vanpool parking area shall be identified on the driveway and circulation plan upon application for a building permit;

(2) One permanent, clearly identified (signed and striped) carpool/vanpool parking space for the first 50,000 to 100,000 square feet of gross floor area and one additional permanent, clearly identified (signed and striped) carpool/vanpool parking space for any development over 100,000 square feet of gross floor area;

(3) Parking spaces clearly identified (signed and striped) shall be provided in the designated carpool/vanpool parking area at any time during the building's occupancy sufficient to meet employee demand for such spaces. Absent such demand, parking spaces within the designated carpool/vanpool parking area may be used by other vehicles;

(4) No signed and striped parking spaces for carpool/vanpool parking shall displace any handicapped parking;

(5) A statement that preferential carpool/vanpool spaces are available on-site and a description of the method for obtaining permission to use such spaces shall be included on the required transportation information board;

(6) A minimum vertical clearance of 7 feet 2 inches shall be provided for all parking spaces and accessways used by vanpool vehicles when located within a parking structure;

(7) Bicycle parking shall be provided in conformance with Section 12.21A16 of this Code.

(c) Development in excess of 100,000 square feet of gross floor area. The owner shall comply with Paragraphs (a) and (b) above and shall provide:

(1) A safe and convenient area in which carpool/vanpool vehicles may load and unload passengers other than in their assigned parking area;

(2) Sidewalks or other designated pathways following direct and safe routes from the external pedestrian circulation system to each building in the development;

(3) If determined necessary by the City to mitigate the project impact, bus stop improvements shall be provided. The City will consult with the local bus service providers in determining appropriate improvements. When locating bus stops and/or planning building entrances, entrances shall be designed to provide safe and efficient access to nearby transit stations/stops;

(4) Safe and convenient access from the external circulation system to bicycle parking facilities on-site.

Air-5
The project applicant shall improve the pedestrian network for the project site to internally link all uses and connect with existing or planned external streets and pedestrian facilities contiguous with the project site. The project applicant shall identify street trees and streetscape improvements to connect site access points to nearby transit and bicycle facilities.

Air-6
The project applicant shall provide traffic calming measures through street improvements. The applicant will be dedicating additional right-of-way along 41st Street, Alameda Street, and Martin Luther King, Jr. Boulevard. In connection with the street dedications and development of the proposed project, the applicant will be upgrading existing sidewalks, curb and gutter, as well as street trees, street lighting, and street furniture around the entire perimeter of the property in consultation with the City Department of Transportation and Department of Public Works. Upgrades to the existing sidewalks will require new curb cuts and crosswalks and the replacement of existing traffic signals at intersections. Additional traffic control devices will be installed as necessary and required to facilitate safe traffic circulation in and around the proposed project site.

Air-7
The project applicant shall ensure low VOC paint is applied for interior and exterior uses [250 EF (g/L)].

Construction emissions are shown in Table IV.B-8, Unmitigated Estimated Daily Regional Construction Emissions, and are only significant for PM_{10}. Operational emissions are shown in Table IV.B-9, Unmitigated Estimated Daily Operational Emissions, and are not significant for any of the criteria air pollutants. The PM_{10} emissions from construction will be mitigated to below the level of significance with the implementation of the seven mitigation measures.

The primary sources of TAC emissions associated with the proposed project's operations would be limited to DPM from delivery trucks. The results of the TAC analysis are shown in Table IV.B-11, Summary of DPM Health Impact Results. As described in Section IV.B (pages IV.B-22) of the Draft EIR, the resulting maximum potential cancer risk is 0.3 in a million, which is only 3 percent of the cancer risk threshold of 10 in a million as set by SCAQMD Rule 1401.

Diesel emissions are particularly examined in the Health Risk Assessment (HRA) found in Appendix V in Volume IV of the Draft EIR. The Draft EIR concluded that noise from the proposed project would have a less than significant impact. Please refer to the Initial Study in Appendix III of this Draft EIR, and to Appendix IS-1, Noise Technical Report, for further information.Thank you for your comment regarding cumulative air quality impacts. There are 11 projects expected to be implemented within a 2-mile radius of the proposed project during the construction period of the proposed project. Cumulative impacts to air quality are expected to be below the level of significance with the implementation of Mitigation Measures Air-1 to Air-7 in the Draft EIR.

Your comment addressing traffic congestion and safety has been noted. From the Traffic Impact Study prepared for Sage Strategies in October of 2014 (Appendix IX in Volume VI of Draft EIR),[60] all study intersections would operate at an acceptable LOS (at LOS A through D) with the exception of traffic impacts at the intersection of Alameda Street and East Washington Boulevard during the PM peak hour. A project's traffic impact is determined to be significant if the increase in V/C is 0.04 or more at LOS C, or 0.02 or more at LOS D, or 0.01 or more at LOS E and F.

Significant impacts occur at the intersection Alameda Street and East Washington Boulevard using 351 truck trips per day based on ITE trip generation rates. Section VI *Alternatives* in the Draft EIR examines the following alternatives: Alternative A, No Project Alternative; Alternative B, Use of Clean Fuel Trucks; and Alternative C, Reduced Truck Operations. These alternatives provide ways to reduce the environmental impact of the proposed project. Under Alternative C, the project would not generate traffic at the ITE-recommended rate (i.e., 351 truck trips per day) which is based on surveys conducted nationally at typical warehouse facilities. The project applicant has indicated that truck trips associated with operation of the proposed project would not exceed 75 daily truck trips, which has therefore been analyzed as Alternative C of the Draft EIR. However, significant impacts will still remain at the intersection of Alameda Street and East Washington Boulevard using full ITE trip rates. Currently, there is a maximum of 33 trips/day total for the various existing facilities. The proposed project build out is not expected to significantly increase this number of trips; hence the 75 daily truck trips was taken as the assumption in Alternative C of the Draft EIR. An analysis with this reduced number of truck trips shows that Alternative C will not have a significant impact at any of the study intersections.

Regarding rail crossing and freeway safety, according to the Addendum to the Traffic Impact Study in October 2014 (Appendix IX in Volume VI of the Draft EIR, page 9).

> *The project's traffic distribution shows that a maximum of 28 vehicles will use the 41st Street at-grade crossing to travel outbound to the west during the PM peak hour, while a maximum of 7 vehicles will use 38th Place at-grade crossing to travel inbound from the east during the AM and PM peak hours. These crossings are currently used by existing traffic, and are adequately equipped with various warning and safety devices to alert and prevent traffic crossing during train movements across 41st Street and 38th Place, and allow safe crossings of traffic when there are no train movements. Therefore, no additional safety measures are deemed necessary at these at-grade rail crossings to accommodate traffic from the project...*
>
> *...The analysis also indicates that the project trips will not exceed the thresholds of requirements for Metro's Congestion Management Program (CMP) analysis. Similarly, the thresholds of requirements for Caltrans District 7's freeway segment and off-ramp analysis will not be exceeded. Therefore, the project will not have a significant impact on the CMP network and freeway segments or off-ramps. The two at-grade rail crossings near the project sites will be used*

[60] Sage Strategies, LLC. October 3, 2014. Appendix XI. Addendum to Traffic Impact Study. Prepared by Traffic Design, Inc.

by the project traffic; however, these rail crossing are currently adequately equipped with warning and safety devices.

COMMENT NO. E54-3

The DEIR's conclusion that community gardens do not carry local community value and economic benefits is insensitive to communities of color. For the people of South LA, access to healthy food – broccoli, asparagus, tomatoes (as opposed to chips, sodas, and candy), as well as skills to produce this food -- are matters of life and death, of sight and blindness. In essence, the DEIR's conclusion negating community value of organic gardens sends a Marie Antoinette message – not let them eat cake, but let them feast on salt, sugar, and fat while other more fortunate areas of Los Angeles enjoy the privilege of eating healthy food and living robust lives.

RESPONSE NO. E54-3

Your comment regarding the value and economic benefits of community gardens, sensitivity to communities of color and in need has been noted. Your concerns will be taken into consideration by the decision-makers prior to taking action on the proposed project. For further information on the Alternatives Analysis and community garden alternative, please see Response to Comment No. E54-1.

COMMENT NO. E54-4

I was equally appalled to read that the DEIR fails to recognize the community value in using the land for recreational purposes. Are we to believe there is a positive net gain in setting aside the land for polluting industrial use, for possible release of carcinogens and other toxins, rather than giving the children of Los Angeles a place to play and run and get in shape? This is a shameful conclusion, truly embarrassing to read.

RESPONSE NO. E54-4

Your comment regarding the value in using the land for recreational purposes has been noted. The commenter's opinion on the conclusions of the Draft EIR has been noted and forwarded to the decision makers for their consideration prior to taking action on the proposed project. As detailed in Response to Comment Nos. E54-1, the project's cash pledge agreement will contribute to open space in the City in a more suitable location, while the project site would be developed consistent with its Community Plan designation, goals and policies, and the project objectives.

The Existing Conditions section in Section IV.B *Air Quality* of the Draft EIR includes ambient air quality data gathered from the local air quality monitoring stations. The average concentrations and days above the standard for each criteria air pollutant are listed in Table IV.B-6 *Summary of 2010-2012 Ambient Air Quality Data in the Proposed Project Vicinity* on page IV.B-11 of the Draft EIR. The Air Quality impact analysis relative to the impacts of the proposed project is further detailed below, and is located in Section IV.B *Air Quality* of the Draft EIR. In the Draft EIR, sensitive receptors are defined on page IV.B-11. There are two maps showing their locations: Figure IV.B-1 *Sensitive Receptors* and Figure IV. B-2 *Receptor Grid and Sensitive Receptors*.

Construction emissions are shown in Table IV.B-8, *Unmitigated Estimated Daily Regional Construction Emissions,* and are only significant for PM_{10}. Operational emissions are shown in Table IV.B-9, *Unmitigated Estimated Daily Operational Emissions*, and are not significant for any of the criteria air pollutants. The PM_{10} emissions from construction will be mitigated to below the level of significance with

the implementation of the seven mitigation measures.

The primary sources of TAC emissions associated with the proposed project's operations would be limited to DPM from delivery trucks. The results of the TAC analysis are shown in Table IV.B-11, Summary of DPM Health Impact Results. As described in Section IV.B (pages IV.B-22) of the Draft EIR, the resulting maximum potential cancer risk is 0.3 in a million, which is only 3 percent of the cancer risk threshold of 10 in a million as set by SCAQMD Rule 1401.

Diesel emissions are particularly examined in the Health Risk Assessment (HRA) found in Appendix V in Volume IV of the Draft EIR. The Draft EIR concluded that noise from the proposed project would have a less than significant impact. Please refer to the Initial Study in Appendix III of this Draft EIR, and to Appendix IS-1, Noise Technical Report, for further information. Cumulative air quality impacts are further discussed on pages IV.B-22 and IV.B-23 of the Draft EIR.

The Department of Toxic Substances Control (DTSC) has reviewed the site characterization and health risk assessment for the site and has concluded that the site is suitable for Industrial/Commercial use, and that future development or rezoning of the property for other than Industrial/Commercial use will require additional analysis and risk evaluation by DTSC to determine the suitability of the site for such use (included as Appendix N to the Final EIR).[61]

COMMENT NO. E54-5

Please re-do this DEIR to take into consideration the abundant community values in using this land for gardening and recreation.

RESPONSE NO. E54-5

Your comment has been noted. As detailed in Response to Comment Nos. E54-1 through E54-4, the alternatives analysis withdrew the community garden and recreation alternatives as being infeasible as they did not meet basic objectives of the project. As stated in the Draft EIR and summarized above, the project's cash pledge agreement will contribute to open space in the City in a more suitable location, while the project site would be developed consistent with its Community Plan designation, goals and policies, and the project objectives.

[61] Department of Toxic Substances Control. 22 December 2015. Letter from Brownfields and Environmental Restoration Program—Chatsworth Office, Haissam Y. Salloum, Senior Engineer, to City of Los Angeles, Department of City Planning, William Lamborn.

LETTER NO. E55

William Ramirez

COMMENT NO. E55-1

I live on Bixel Street of Los Angeles. I have lived in Los Angeles since 2001. I've been working at Poetry since May 2009. I am currently in the shipping department. With this job, I have been able to support my family. It has helped me become a better member of my family.

Working at Poetry has been a great experience. Poetry's working environment is professional and very great. I look forward to working with my co-workers every day. We get through the good times and bad times together, while always looking to help each other towards success. The product that our company sells brings happiness to many people around the world. By providing great merchandise, we give people opportunities for their business while providing people what they want. We help support, by giving jobs, not only here in Los Angeles, but also in China. I am happy to say Poetry is a great company.

RESPONSE NO. E55-1

Your comment on the proposed project has been noted. Your concerns will be taken into consideration by the decision makers prior to taking action on the proposed project.

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LETTER NO. E56

R.S. Rense

COMMENT NO. E56-1

I oppose development of 4051 Alameda for purposes of a so-called "industrial park." Better that it be a park, or used by urban farmers. L.A., especially south L.A., does not need this type of exploitation.

RESPONSE NO. E56-1

Section 15126.6 of the CEQA Guidelines requires an EIR to describe a range of reasonable alternatives to a project or to the location of a project that would feasibly attain most of the basic objectives of a project but would avoid or substantially lessen any of the significant effects of a project, and evaluate the comparative merits of the alternatives. The discussion of alternatives, however, need not be exhaustive, but rather the discussion must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. An EIR is not required to consider alternatives that are deemed "infeasible." In developing alternatives, the following factors are considered: (i) ability to meet most of the basic project objectives, (ii) feasibility, or (iii) ability to avoid or substantially lessen significant environmental impacts.

As set forth in Section VI of the Draft EIR on pages VI-3 to VI-4, the Community Garden alternative, requested through public comments, considered development of the project for an alternate land use, specifically a community garden. However, this alternative was withdrawn from consideration as it does not meet the basic project objectives:

- A community garden or park would not attain the objective of providing a minimum of 480,000 square feet of light industrial space, consistent with the existing land use designation and zoning.

- A community garden or park would not provide light manufacturing jobs within 3 miles of an existing garment manufacturing labor force in the Southeast Los Angeles Community Plan Area.

- A community garden or park would not allow for development of an industrial park that is along the Alameda Corridor to take advantage of distribution efficiency opportunities.

- A community garden or park would not facilitate the ability of existing garment labor force, located in close proximity to the project site to utilize existing public transit system and other multi-modal transportation opportunities in vicinity of proposed project.

- A community garden or park would not preserve and/or redevelop the industrial sector of the Southeast Los Angeles Community Plan Area to accommodate emerging technologies, thus providing an enhanced employment base for the Community Plan Area's population.

- A community garden or park would not benefit the Southeast Los Angeles Community Plan area population as economic stimulation through employment opportunities, attracting commercial and industrial tenants to the area, and providing tax revenue for the City would not occur.

The proposed use of the property as light manufacturing is consistent with land use planning objectives articulated in the Southeast Los Angeles Community Plan. The City of Los Angeles Southeast Los Angeles Community Plan has designated the project site as light industrial. The land use designation discourages nonindustrial uses and uses that compromise job-producing potential. Plan Goal 3 supports sufficient land for a variety of industrial uses with maximum employment opportunities, which are safe for the environment and the work force, and which have minimal adverse impacts on adjacent uses. The South East Los Angeles Community Plan further supports the retention and redevelopment of the industrial sector through Objective 3-1, Policy 3-1.1, and Objective 3-2, Policy 3-2.1:

> **Objective 3-1** To provide for existing and future industrial uses which contribute job opportunities for residents and which minimize environmental and visual impacts to the community.
>
> **Policies 3-1.1** Designate lands for the continuation of existing industry and development of new industrial parks, research and development uses, light manufacturing, and similar uses which provide employment opportunities.
>
> **Objective 3-2** To retain industrial plan designations to maintain the industrial employment base for community residents and to increase it whenever possible.
>
> **Policies 3-2.1** The significant, large industrially planned parcels located in predominantly industrial areas associated with the railroad transportation facilities along Alameda and in the Slauson area should be protected from development by other uses which do not support the industrial base of the community, and the City.

The Southeast Los Angeles Community Plan's open space goals and objectives support the preservation of existing open space and the development of new open space, in balance with new development, to serve the recreational, environmental, health and safety needs of the community. The objectives further note that the "Plan Map designates lands for open spaces including parklands." As noted above, the project site is in an industrial corridor adjacent to the Alameda Corridor rail line, and it is not designated for open space on the plan map. The area surrounding the proposed project site is developed almost exclusively with light and heavy industrial uses, with limited small lot single family residential homes intermixed with light/industrial warehouse uses to the south and residential areas farther to the west. The Alameda Corridor rail line is located directly to the east and runs below grade in the project area, and also includes the Southern Pacific Railroad right-of-way across South Alameda Street. The Metro Blue Line light rail is located immediately to the west of the project site. The nearest designated open space is the Ross Snyder Recreation Center, located 0.2 mile west of the proposed project site.

The applicant acknowledges the former interim use of the project site as a community garden that occurred under previous ownership. However, the use was discontinued in 2006, and the project site is currently vacant underutilized land in an industrially zoned area. Appendix XII and Section III.E of the Draft EIR provide details of a 2003 settlement agreement between the prior owner and the City of Los Angeles to dedicate 2.6 acres of the property for maintenance of a park for recreation and park purposes, and subsequent amendment of the agreement to allow the proposed project to be developed. This amendment for the cash pledge provided the City or a nonprofit organization with the funds to dedicate a park in a more appropriate location than the project site, which is industrially zoned and isolated to the west and east by major rail lines. The City Council accordingly determined that establishment of an active use park on the property is inappropriate due to the property's location in an industrial corridor, and authorized execution of a Cash Pledge Agreement whereby a payment in the amount of $3,573,365 was made to improve and provide recreational and park facilities at more suitable alternate sites in the vicinity

of the property (see Report of the Chief Legislative Analyst, Ordinance No. 181949, and City Council Motion included in Appendix XII of the Draft EIR). The value of the cash pledge was determined on the basis of the pro rata value of the 2.6 acres to be set aside for recreational purposes pursuant to the settlement agreement relative to the overall purchase price of the project site. For further information on the site background and cash pledge agreement for park and recreational uses, please see pages IV-3 and IV-4 of the Corrections and Additions section of this Final EIR, and pages III-6 and III-7 and Appendix XII of the Draft EIR.

As stated in the Draft EIR and summarized above, the project's cash pledge agreement will contribute to open space in the City in a more suitable location, while the project site would be developed consistent with its Community Plan designation, goals and policies, and the project objectives.

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LETTER NO. E57

Anahi Reyes

COMMENT NO. E57-1

I've been living in Broadway st Los Angeles for 3 years; I've worked for impact for 5 years I started off as a trimmer after a year patron (tony) gave me the opportunity to learn pre-production it was hard at the time but nothing is impossible. I learn so many things over the years. I appreciate my boss for helping me become something better in this life. This job has helped me a lot economic and so many other ways. I love my job we get to meet new people and work with big companies. I'm really happy to work with impact and experience new things. I feel really happy to see famous people wearing our products that we made here at impact. This job has helped me so much in helping my family in every way.

RESPONSE NO. E57-1

Your comment to the proposed project has been noted. Your concerns will be taken into consideration by the decision makers prior to taking action on the proposed project.

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LETTER NO. E58

Anne Richardson, Esq.
Public Counsel
610 South Ardmore Avenue
Los Angeles, CA 90005

COMMENT NO. E58-1

I am writing on behalf of Public Counsel to submit these comments on the Draft EIR conducted by the City of Los Angeles Planning Department for the 41st and Alameda proposed industrial park (hereafter Proposed Industrial Park") in Council District 9.

Public Counsel is the largest not-for-profit law firm of its kind in the nation. Established in 1970, Public Counsel is dedicated to advancing equal justice under law by delivering free legal and social services to indigent and underrepresented children, adults and families throughout Los Angeles County. Last year, Public Counsel assisted more than 30,000 people with direct legal services and assisted hundreds of thousands more through filing impact lawsuits, influencing policy, and sponsoring legislation.

Public Counsel is concerned about the project currently being proposed to be built on this parcel for several reasons.

RESPONSE NO. E58-1

This comment provides introductory transmittal information and information on the Public Counsel, and does not directly address the contents of the Draft EIR. Comments on the project and Draft EIR follow with responses.

COMMENT NO. E58-2

First, the development that is proposed to be built would not have a positive effect long term on the Los Angeles workforce. Other than a few short term construction jobs, once the project is built, there are not anticipated to be many new positions. The work that would result long term would simply be a continuation of the current manufacturers Poetry, Impact, Miss Me, and Active. (See pp. 253-256 of the Initial Study). These are typically low wage garment worker jobs in an industry well-known for its wage and hour violations. See, for example, this November 2014 news release from the U.S. Department of Labor, entitled "Workers face millions in unpaid wages in Southern California garment industry," last accessed on March 5, 2015 at http://www.dol.gov/opa/media/press/whd/WHD20142047.htm

Indeed, according to the California Department of Labor Standards Enforcement, since 2003, there have been a total of 15 wage claims filed against the manufacturers that make up the PIMA group: 2 against Poetry, 1 against Impact, 7 against Miss Me, and 5 against Active USA, Inc. The individual claims range from $4,500 to $63,600, and the violations alleged include failure to pay minimum wage and overtime. The vast majority resulted in settlements. Moreover, the Bureau of Field Enforcement has issued one citation each against Poetry, Impact, and Miss Me.

RESPONSE NO. E58-2

Your comment concerning the long-term job creation potential of this project and past PIMA labor violations has been noted. The proposed project would employ 994 people, of whom 404 would be new

employees, which is consistent with the City of Los Angeles intent to provide industrial job opportunities for residents through the development of the new industrial park.

Company	Transferred Jobs	New Jobs	Total
Poetry	90	41	131
Impact	250	245	495
Miss Me	130	61	191
Active	120	57	177
Total	**590**	**404**	**994**

In addition, the project applicant has entered into a Construction Local Hire Agreement with Playa Vista Job Opportunities and Business Services (PVJOBS) for the proposed project. The Local Hire Agreement with PVJOBS has been added to the Final EIR as Appendix O. As a result of the local hire agreement, up to 20 percent of the construction jobs for project are proposed to be from the local community:

- The Applicant has agreed to make an assertive effort to achieve a performance goal whereby 20 percent of all hours worked in construction at the site will be performed by Local Residents (Local Hire Goal). Preference will be given to Local Residents in the following order: (i) those living within one mile of the proposed project site; (ii) those living within the three miles of the proposed project site; and (iii) all other City of Los Angeles residents who reside in a census tract with high unemployment rates. Contractor's core or pre-existing workers qualify toward the Local Hire Goal. Contractors may use their own methods to identify and hire workers who qualify for the Local Hire Goals.

- Applicant has agreed to make an assertive effort to achieve a performance goal whereby 10 percent of all hours worked in construction at the site will be performed by At-Risk Individuals (the At-Risk Hire Goal). Hours completed under the 10 percent At-Risk Hire Goal also count toward the 20 percent Local Hire Goal. All At-Risk hires shall be referred by PVJOBS.

Furthermore, the project applicant has entered into a local hire agreement with the Coalition for Responsible Community Development and the Los Angeles Job Corps for the operational phase of the project. The Local Hire Agreement with the Coalition for Responsible Community Development and the Los Angeles Job Corps has been added to the Final EIR as Appendix O. PIMA has agreed to use commercially reasonable efforts to hire at least 50 percent of the four companies' employees from high unemployment areas. Preference will be given to Local Residents in the following order: (i) those living within one mile of the proposed project site; (ii) those living within three miles of the proposed project site; and (iii) all other City of Los Angeles residents who reside in a census tract with high unemployment rates.

Poetry, Impact, MissMe, and Active currently employ a total of approximately 590 employees. As stated in section III.C of the draft EIR, the number of employees will increase to approximately 994, an increase of almost 175 percent. The information regarding unpaid wages in the garment industry and the statistics maintained by the Department of Labor Standards Enforcement do not raise any environmental issues. The comments are acknowledged and will be forwarded to the decision makers for consideration

COMMENT NO. E58-3

We also echo the concerns of many other community groups that this development will not address the problem that the area in which this development is proposed is park poor. One UCLA study revealed that Council District 9 has the least park acreage per child of any district in Los Angeles.

See http://www.environment.ucla.edu/reportcard/article1455.html. As others have expressed, there has been insufficient attention paid to the urban garden alternative that has so much support from the community.

RESPONSE NO. E58-3

Your comment regarding the deficit of park facilities in the area and lack of attention on the urban garden alternative in the Draft EIR is acknowledged. Section 15126.6 of the CEQA Guidelines requires an EIR to describe a range of reasonable alternatives to a project or to the location of a project that would feasibly attain most of the basic objectives of a project but would avoid or substantially lessen any of the significant effects of a project, and evaluate the comparative merits of the alternatives. The discussion of alternatives, however, need not be exhaustive, but rather the discussion must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. An EIR is not required to consider alternatives that are deemed "infeasible." In developing alternatives, the following factors are considered: (i) ability to meet most of the basic project objectives, (ii) feasibility, or (iii) ability to avoid or substantially lessen significant environmental impacts.

As set forth in Section VI of the Draft EIR on pages VI-3 to VI-4, the Community Garden alternative, requested through public comments, considered development of the project for an alternate land use, specifically a community garden. However, this alternative was withdrawn from consideration as it does not meet the basic project objectives:

- A community garden or park would not attain the objective of providing a minimum of 480,000 square feet of light industrial space, consistent with the existing land use designation and zoning.
- A community garden or park would not provide light manufacturing jobs within 3 miles of an existing garment manufacturing labor force in the Southeast Los Angeles Community Plan Area.
- A community garden or park would not allow for development of an industrial park that is along the Alameda Corridor to take advantage of distribution efficiency opportunities.
- A community garden or park would not facilitate the ability of existing garment labor force, located in close proximity to the project site to utilize existing public transit system and other multi-modal transportation opportunities in vicinity of proposed project.
- A community garden or park would not preserve and/or redevelop the industrial sector of the Southeast Los Angeles Community Plan Area to accommodate emerging technologies, thus providing an enhanced employment base for the Community Plan Area's population.
- A community garden or park would not benefit the Southeast Los Angeles Community Plan area population as economic stimulation through employment opportunities, attracting commercial and industrial tenants to the area, and providing tax revenue for the City would not occur.

The proposed use of the property as light manufacturing is consistent with land use planning objectives articulated in the Southeast Los Angeles Community Plan. The City of Los Angeles Southeast Los Angeles Community Plan has designated the project site as light industrial. The land use designation

discourages nonindustrial uses and uses that compromise job-producing potential. Plan Goal 3 supports sufficient land for a variety of industrial uses with maximum employment opportunities, which are safe for the environment and the work force, and which have minimal adverse impacts on adjacent uses. The South East Los Angeles Community Plan further supports the retention and redevelopment of the industrial sector through Objective 3-1, Policy 3-1.1, and Objective 3-2, Policy 3-2.1:

> **Objective 3-1** To provide for existing and future industrial uses which contribute job opportunities for residents and which minimize environmental and visual impacts to the community.
>
> **Policies 3-1.1** Designate lands for the continuation of existing industry and development of new industrial parks, research and development uses, light manufacturing, and similar uses which provide employment opportunities.
>
> **Objective 3-2** To retain industrial plan designations to maintain the industrial employment base for community residents and to increase it whenever possible.
>
> **Policies 3-2.1** The significant, large industrially planned parcels located in predominantly industrial areas associated with the railroad transportation facilities along Alameda and in the Slauson area should be protected from development by other uses which do not support the industrial base of the community, and the City.

The Southeast Los Angeles Community Plan's open space goals and objectives support the preservation of existing open space and the development of new open space, in balance with new development, to serve the recreational, environmental, health and safety needs of the community. The objectives further note that the "Plan Map designates lands for open spaces including parklands." As noted above, the project site is in an industrial corridor adjacent to the Alameda Corridor rail line, and it is not designated for open space on the plan map. The area surrounding the proposed project site is developed almost exclusively with light and heavy industrial uses, with limited small lot single family residential homes intermixed with light/industrial warehouse uses to the south and residential areas farther to the west. The Alameda Corridor rail line is located directly to the east and runs below grade in the project area, and also includes the Southern Pacific Railroad right-of-way across South Alameda Street. The Metro Blue Line light rail is located immediately to the west of the project site. The nearest designated open space is the Ross Snyder Recreation Center, located 0.2 mile west of the proposed project site.

The applicant acknowledges the former interim use of the project site as a community garden that occurred under previous ownership. However, the use was discontinued in 2006, and the project site is currently vacant underutilized land in an industrially zoned area. Appendix XII and Section III.E of the EIR provide details of a 2003 settlement agreement between the prior owner and the City of Los Angeles to dedicate 2.6 acres of the property for maintenance of a park for recreation and park purposes, and subsequent amendment of the agreement to allow the proposed project to be developed. This amendment for the cash pledge provided the City or a nonprofit organization with the funds to dedicate a park in a more appropriate location than the project site, which is industrially zoned and isolated to the west and east by major rail lines. The City Council accordingly determined that establishment of an active use park on the property is inappropriate due to the property's location in an industrial corridor, and authorized execution of a Cash Pledge Agreement whereby a payment in the amount of $3,573,365 was made to improve and provide recreational and park facilities at more suitable alternate sites in the vicinity of the property (see Report of the Chief Legislative Analyst, Ordinance No. 181949, and City Council Motion included in Appendix XII of the Draft EIR). The value of the cash pledge was determined on the basis of the pro rata value of the 2.6 acres to be set aside for recreational purposes pursuant to the settlement agreement relative to the overall purchase price of the project site. For further information on the site

background and cash pledge agreement for park and recreational uses, please see pages IV-3 and IV-4 of the Corrections and Additions section of this Final EIR, and pages III-6 and III-7 and Appendix XII of the Draft EIR.

As stated in the Draft EIR and summarized above, the project's cash pledge agreement will contribute to open space in the City in a more suitable location, while the project site would be developed consistent with its Community Plan designation, goals and policies, and the project objectives.

COMMENT NO. E58-4

Moreover, the pollution that would be generated by this project presents a major health hazard. This lot is only a few blocks away from Jefferson High School, and with residential housing on three sides, the pollution that would be generated from the diesel truck trips is a major public health concern. Los Angeles is rated first, third and fourth among the top 10 worst municipalities on air quality nationwide. See http://www.stateoftheair.org/2014/city-rankings/most-polluted- cities.html.

RESPONSE NO. E58-4

Your comment regarding the risk from diesel truck trips and exposure for residential housing on three sides of the project is acknowledged.

The proposed project site is surrounded on three sides by industrial uses. Residential uses are located to the west of the project site across Long Beach Boulevard and the Metro Blue Line light rail line. Construction related toxic air contaminants (TACs) from diesel particulate emissions will be short lived (3 months), and therefore do not require a Health Risk Assessment from the Office of Environmental Health Hazard Assessment (OEHHA). OEHHA looks at long term basis (70 year) cancer impacts so the impact of short term TACs from the construction of the proposed project is considered less than significant.

For operations of the proposed project, there will be an estimated 31 diesel fueled trucks/day out of a total 351 total truck trips/day under the most conservative scenario. Because the total number of truck trips is greater than 100 daily truck trips, a refined Health Risk Assessment (HRA) for operational impacts was conducted that identified sensitive receptors and individual cancer risk. According to the HRA, the maximum potential cancer risk is 0.3 in one million. This is only 3 percent of the cancer risk threshold of 10 in a million. Therefore, the proposed project would not result in significant human health risks related to diesel emissions. The alternatives with clean fuel trucks and reduced truck operations would result in even fewer diesel emissions and a corresponding reduction in potential impacts on human health associated with those emissions.

There are 64 identified sensitive receptors within a 500-foot radius of the proposed project site. See Section IV.B, *Air Quality*, specifically Figure IV.B-1, *Sensitive Receptors* and Figure IV.B-2, *Receptor Grid and Sensitive Receptors*. The sensitive receptors include multifamily residences located to the west, southwest, and south of the proposed project site. Schools and recreation centers are included in the CARB's definition of sensitive receptors, but the nearest school and recreation center, including Nevin Avenue School, Jefferson High School, Roberts Recreation Center, Ascot Avenue School, and Holland Avenue School, are located outside of the 500 foot radius of the proposed project site. In addition, an Air Quality Health Risk Assessment (Appendix V in Volume IV, pages 6–8 of the Draft EIR) was performed in relation to specific sensitive receptors, including those receptors mentioned above (see pages 6–8 of Appendix V of the Draft EIR). This analysis identified the point of maximum impact to all receptors, residential receptors, sensitive receptors, and receptors of interest. The point of maximum impact (PMI) to any receptor, which is Receptor P2, is 0.00135 µg/m3 for the modeled annual average diesel particulate

matter (DPM) concentration. (All receptors are shown in Figure IV.B-2.) While there are no chronically exposed persons at that receptor, there are off-site workers immediately adjacent to the project site so this PMI concentration was assumed to be the maximum off-site worker receptor. The PMI for residential receptors is Receptor NR3, which has an annual average DPM concentration of 0.00020 $\mu g/m^3$ and is the Maximum Exposed Individual Residence (MEIR). The PMI for sensitive receptors is Receptor SR1, the Amino Middle School, which has an annual average DPM concentration of 0.00003 $\mu g/m^3$. The PMI for receptors of interest is Receptor OR-B, the Los Angeles Regional Food Bank, which has an annual average DPM concentration of 0.00101 $\mu g/m^3$. Table IV.B-11 of the Draft EIR contains a summary of the health impact results from DPM on these key sensitive receptors. The potential health risk from diesel fueled trucks is very small, with a maximum non-cancer health impact (HI) of 0.0003, and a maximum potential cancer risk of 2.6×10^{-7} or 0.3 in a million. The traditional threshold used to evaluate potential non-cancer risk is a HI of 1.0, and the public notification threshold for cancer risk is 10×10^{-6} or 10 in a million as set by SCAQMD Rule 1401. The point of maximum impact (PMI) for any receptor is Receptor P2, UTM coordinates 385327.80 easting, 3763938.40 northing. There are no chronically exposed persons at that receptor as it falls on the fenceline of the proposed project site. The modeled annual average DPM concentration at the PMI is 0.00135 μg/m3. No persons are continuously exposed at the PMI. However, as is shown in Figure IV.B-2, *Receptor Grid and Sensitive Receptors*, there are off-site workers immediately adjacent to the proposed project site. Therefore, as a worst-case approximation, the PMI concentration was assumed to be the maximum off-site worker receptor.

The PMI for residential receptors is Receptor NR3, west of the facility. This receptor is the Maximum Exposed Individual Residence (MEIR). The modeled annual average DPM concentration at the MEIR is 0.00020 $\mu g/m^3$.

The PMI for sensitive receptors is Receptor SR1, the Animo Middle School. The modeled annual average DPM concentration at this receptor is 0.00003 $\mu g/m^3$.

The PMI for receptors of interest is Receptor OR-B, the Los Angeles Regional Food Bank. The modeled annual average DPM concentration at this receptor is 0.00101 $\mu g/m^3$.

The other receptors of interest, sensitive receptors, residential receptors, and worker receptors all had DPM concentrations much less than the PMI values noted above and are not discussed further.

Risk was calculated from the DPM concentration results produced by AERMOD by hand using the methodology employed by HARP (Hotspots Analysis Reporting Program) and the equations described above for the 2012 TSD methodology. The results are shown in Table IV.B-11, *Summary of DPM Health Impact Results*, in Section IV.B Air Quality of the Draft EIR. As mentioned above, the proposed project warrants a refined HRA for substantial sources of DPM.

The maximum potential risks from this facility are less than 0.03 percent of the non-cancer threshold and less than 3 percent of the cancer threshold. Therefore, the proposed project would not result in the significant human health risks related to diesel emissions.

There are a relatively small number of diesel-fueled trucks that will be using the proposed facility (up to 31 diesel-fueled trucks per day of the estimated 351total trucks per day). Therefore, there are relatively very small emissions of diesel particulate from those trucks, and the potential health risk of those emissions are very small, with a maximum non-cancer HI of 0.0003, and a maximum potential cancer risk of 2.6×10^{-7} or 0.3 in a million. The traditional threshold used to evaluate potential non-cancer risk is a HI of 1.0, and the public notification threshold for cancer risk is 10×10^{-6} or 10 in a million. The maximum potential risks from this facility are less than 0.03 percent of the non-cancer threshold and less

than 3 percent of the cancer threshold. Therefore, the proposed project would not result in the significant human health risks related to diesel emissions.

From the construction and operational emissions modeling and analysis of the proposed project, all criteria pollutants except PM_{10} would be below SCAQMD significance thresholds. This information is summarized in Table IV.B-8 Unmitigated Estimated Daily Regional Construction Emissions and Table IV.B-9 Unmitigated Estimated Daily Operational Emissions in the Draft EIR. PM_{10} emissions are expected to be below the level of significance with implementation of Mitigation Measures Air-1 through Air-3 listed on page IV.B-23 of the Draft EIR.

COMMENT NO. E58-5

We urge the City of Los Angeles not to pave over the Historic South Central Farm with more garment manufacturers. There is so much potential on this parcel for green space, healthy foods, urban gardens, environmental education, and parks and recreation instead. Thank you for your consideration.

RESPONSE NO. E58-5

As discussed in Response to Comment No. E58-3, the Community Garden Alternative was withdrawn from further consideration as it did not meet basic project objectives. The proposed use of the property as light manufacturing is consistent with land use planning objectives articulated in the Southeast Los Angeles Community Plan. The City of Los Angeles Southeast Los Angeles Community Plan has designated the project site as light industrial. The land use designation discourages nonindustrial uses and uses that compromise job-producing potential. Plan Goal 3 supports sufficient land for a variety of industrial uses with maximum employment opportunities, which are safe for the environment and the work force, and which have minimal adverse impacts on adjacent uses.

The Southeast Los Angeles Community Plan's open space goals and objectives support the preservation of existing open space and the development of new open space, in balance with new development, to serve the recreational, environmental, health and safety needs of the community. The objectives further note that the "Plan Map designates lands for open spaces including parklands." As noted above, the project site is in an industrial corridor adjacent to the Alameda Corridor rail line, and it is not designated for open space on the plan map. The nearest designated open space is the Ross Snyder Recreation Center, located 0.2 mile west of the proposed project site.

The applicant acknowledges the former interim use of the project site as a community garden that occurred under previous ownership. However, the use was discontinued in 2006, and the project site is currently vacant underutilized land in an industrially zoned area. Appendix XII and Section III.E of the Draft EIR provide details of a 2003 settlement agreement between the prior owner and the City of Los Angeles to dedicate 2.6 acres of the property for maintenance of a park for recreation and park purposes, and subsequent amendment of the agreement to allow the proposed project to be developed. This amendment for the cash pledge provided the City or a nonprofit organization with the funds to dedicate a park in a more appropriate location than the project site, which is industrially zoned and isolated to the west and east by major rail lines. The City Council accordingly determined that establishment of an active use park on the property is inappropriate due to the property's location in an industrial corridor, and authorized execution of a Cash Pledge Agreement whereby a payment in the amount of $3,573,365 was made to improve and provide recreational and park facilities at more suitable alternate sites in the vicinity of the property (see Report of the Chief Legislative Analyst, Ordinance No. 181949, and City Council Motion included in Appendix XII of the Draft EIR). The value of the cash pledge was determined on the basis of the pro rata value of the 2.6 acres to be set aside for recreational purposes pursuant to the

settlement agreement relative to the overall purchase price of the project site. For further information on the site background and cash pledge agreement for park and recreational uses, please see pages IV-3 and IV-4 of the Corrections and Additions section of this Final EIR, and pages III-6 and III-7 and Appendix XII of the Draft EIR.

As stated in the Draft EIR and summarized above, the project's cash pledge agreement will contribute to open space in the City in a more suitable location, while the project site would be developed consistent with its Community Plan designation, goals and policies, and the project objectives.

LETTER NO. E59

Miriam Rodriguez

COMMENT NO. E59-1

I live in South Central Los Angeles, I been working for Poetry Clothing for 6 years. I started working as a receptionist and now I'm a production coordinator, and plan to climb up to a designer. It's a very clean and safe environment. I'm really happy working for Poetry. The best part about this job is to see people wearing our merchandise.

RESPONSE NO. E59-1

Your comment to the proposed Project has been noted. Your concerns will be taken into consideration by the decision makers prior to taking action on the proposed project.

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LETTER NO. E60

Abel Ruiz

COMMENT NO. E60-1

I am Abel Ruiz, I've worked at IMPACT for many years. I have always had plenty of work here. Tony, the boss, is good to us. I have worked with him for 20 years. He is very amiable and humble. I am surrounded by people of good character. I am happy to have a job with Tony. I live in Los Angeles, close to my job and it's convenient when I work over time so I don't get home too late. I am very grateful to my boss.

RESPONSE NO. E60-1

Your comment on the proposed project has been noted. Your concerns will be taken into consideration by the decision makers prior to taking action on the proposed project.

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LETTER NO. E61

Samuel Ruiz

COMMENT NO. E61-1

I have worked for Tony for over 25 years. I have nothing but good things to say about him. He has been a great boss, and has taken good care of his employees. I have worked for Tony for so long not because there wasn't any other jobs, but because he provided the best job for me. I am satisfied working for Tony.

RESPONSE NO. E61-1

Your comment on the proposed project has been noted. Your concerns will be taken into consideration by the decision makers prior to taking action on the proposed project.

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LETTER NO. E62

Eugene Ruyle Letter No. 1

COMMENT NO. E62-1

I have reviewed the Draft EIR for the 4051 South Alameda Street Project and find it unacceptable. My understanding is that CEQA requires the EIR to be an objective analysis of the environmental impacts of the various alternatives to a proposed development. Instead, this is a highly biased document favoring the developer's pet project, with little consideration of the wishes and well being of the surrounding community.

RESPONSE NO. E62-1

Your comment to the 4051 Alameda Project has been noted. Section 15126.6 of the CEQA Guidelines requires an EIR to describe a range of reasonable alternatives to a project or to the location of a project that would feasibly attain most of the basic objectives of a project but would avoid or substantially lessen any of the significant effects of a project, and evaluate the comparative merits of the alternatives. The discussion of alternatives, however, need not be exhaustive, but rather the discussion must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. An EIR is not required to consider alternatives that are deemed "infeasible". In developing alternatives, the following factors are considered: (i) ability to meet most of the basic project objectives, (ii) feasibility, or (iii) ability to avoid or substantially lessen significant environmental impacts.

COMMENT NO. E62-2

The site is described as "an approximately 13-acre vacant lot with scattered weeds and grasses," "not designated as or suitable to be designated as" agricultural land, in spite of the fact that it was used for over a decade as an urban farm by largely immigrant families. Further, the Angeleno public has demonstrated its opposition to any other use. The two decades of community struggles to preserve the land for agricultural purposes are barely mentioned in this pro-development EIR.

RESPONSE NO. E62-2

Your comment related to the use of the project site for agricultural purposes has been noted. Section 15126.6 of the CEQA Guidelines requires an EIR to describe a range of reasonable alternatives to a project or to the location of a project that would feasibly attain most of the basic objectives of a project but would avoid or substantially lessen any of the significant effects of a project, and evaluate the comparative merits of the alternatives. The discussion of alternatives, however, need not be exhaustive, but rather the discussion must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. An EIR is not required to consider alternatives that are deemed "infeasible." In developing alternatives, the following factors are considered: (i) ability to meet most of the basic project objectives, (ii) feasibility, or (iii) ability to avoid or substantially lessen significant environmental impacts.

As set forth in Section VI of the Draft EIR on pages VI-3 to VI-4, the Community Garden alternative, requested through public comments, considered development of the project for an alternate land use, specifically a community garden. However, this alternative was withdrawn from consideration as it does not meet the basic project objectives:

- A community garden or park would not attain the objective of providing a minimum of 480,000 square feet of light industrial space, consistent with the existing land use designation and zoning.

- A community garden or park would not provide light manufacturing jobs within 3 miles of an existing garment manufacturing labor force in the Southeast Los Angeles Community Plan Area.

- A community garden or park would not allow for development of an industrial park that is along the Alameda Corridor to take advantage of distribution efficiency opportunities.

- A community garden or park would not facilitate the ability of existing garment labor force, located in close proximity to the project site to utilize existing public transit system and other multi-modal transportation opportunities in vicinity of proposed project.

- A community garden or park would not preserve and/or redevelop the industrial sector of the Southeast Los Angeles Community Plan Area to accommodate emerging technologies, thus providing an enhanced employment base for the Community Plan Area's population.

- A community garden or park would not benefit the Southeast Los Angeles Community Plan area population as economic stimulation through employment opportunities, attracting commercial and industrial tenants to the area, and providing tax revenue for the City would not occur.

The proposed use of the property as light manufacturing is consistent with land use planning objectives articulated in the Southeast Los Angeles Community Plan. The City of Los Angeles Southeast Los Angeles Community Plan has designated the project site as light industrial. The land use designation discourages nonindustrial uses and uses that compromise job-producing potential. Plan Goal 3 supports sufficient land for a variety of industrial uses with maximum employment opportunities, which are safe for the environment and the work force, and which have minimal adverse impacts on adjacent uses. The South East Los Angeles Community Plan further supports the retention and redevelopment of the industrial sector through Objective 3-1, Policy 3-1.1, and Objective 3-2, Policy 3-2.1:

Objective 3-1 To provide for existing and future industrial uses which contribute job opportunities for residents and which minimize environmental and visual impacts to the community.

Policies 3-1.1 Designate lands for the continuation of existing industry and development of new industrial parks, research and development uses, light manufacturing, and similar uses which provide employment opportunities.

Objective 3-2 To retain industrial plan designations to maintain the industrial employment base for community residents and to increase it whenever possible.

Policies 3-2.1 The significant, large industrially planned parcels located in predominantly industrial areas associated with the railroad transportation facilities along Alameda and in the Slauson area should be protected from development by other uses which do not support the industrial base of the community, and the City.

The Southeast Los Angeles Community Plan's open space goals and objectives support the preservation of existing open space and the development of new open space, in balance with new development, to serve the recreational, environmental, health and safety needs of the community. The objectives further note that the "Plan Map designates lands for open spaces including parklands." As noted above, the project site is in an industrial corridor adjacent to the Alameda Corridor rail line, and it is not designated for open space on the plan map. The area surrounding the proposed project site is developed almost exclusively with light and heavy industrial uses, with limited small lot single family residential homes intermixed with light/industrial warehouse uses to the south and residential areas farther to the west. The Alameda Corridor rail line is located directly to the east and runs below grade in the project area, and also includes the Southern Pacific Railroad right-of-way across South Alameda Street. The Metro Blue Line light rail is located immediately to the west of the project site. The nearest designated open space is the Ross Snyder Recreation Center, located 0.2 mile west of the proposed project site.

Appendix XII and Section III.E of the Draft EIR provide details of a 2003 settlement agreement between the prior owner and the City of Los Angeles to dedicate 2.6 acres of the property for maintenance of a park for recreation and park purposes, and subsequent amendment of the agreement to allow the proposed project to be developed. This amendment for the cash pledge provided the City or a nonprofit organization with the funds to dedicate a park in a more appropriate location than the project site, which is industrially zoned and isolated to the west and east by major rail lines. The City Council accordingly determined that establishment of an active use park on the property is inappropriate due to the property's location in an industrial corridor, and authorized execution of a Cash Pledge Agreement whereby a payment in the amount of $3,573,365 was made to improve and provide recreational and park facilities at more suitable alternate sites in the vicinity of the property (see Report of the Chief Legislative Analyst, Ordinance No. 181949, and City Council Motion included in Appendix XII of the Draft EIR). The value of the cash pledge was determined on the basis of the pro rata value of the 2.6 acres to be set aside for recreational purposes pursuant to the settlement agreement relative to the overall purchase price of the project site. For further information on the site background and cash pledge agreement for park and recreational uses, please see pages IV-3 and IV-4 of the Corrections and Additions section of this Final EIR, and pages III-6 and III-7 and Appendix XII of the Draft EIR.

As stated in the Draft EIR and summarized above, the project's cash pledge agreement will contribute to open space in the City in a more suitable location, while the project site would be developed consistent with its Community Plan designation, goals and policies, and the project objectives.

With regard to the history of community struggles, the applicant acknowledges the former interim use of the project site as a community garden that occurred under previous ownership. However, the use was discontinued in 2006, and the project site is currently vacant land in an industrially zoned area. Section III, Project Description, subsection E, Background, on pages III-6 through III-7 of the Draft EIR discusses the project background and history of the property starting in 1986 when the City acquired the property through condemnation, with further background information provided in pages IV-3 and IV-4 of the Corrections and Additions section of this Final EIR.

COMMENT NO. E62-3

The Draft EIR acknowledges that the "air quality in Southern California does not meet state and federal standards," and that the American Lung Association "consistently gives Los Angeles County failing grades in the amount of ozone and particulate pollution in the air." It further acknowledges that the proposed project, consisting of four industrial buildings totaling nearly 500,000 square feet, would "have the potential to result in significant impacts related to global climate change," but it nowhere compares the proposed project with the agricultural alternative favored by the community. Indeed, the community

agricultural alternative proposed by public comment was rejected out of hand because it would not provide any industrial space!

RESPONSE NO. E62-3

Your comment about poor air quality in the region as defined by the American Lung Association has been noted. The City of Los Angeles has addressed potential alternatives to reduce the air quality and greenhouse gas emissions impact from the proposed project in Section IV.B of the Draft EIR. The American Lung Association gives an "F" rating for ozone, particulate pollution (24-hour), and particulate pollution (annual) for Los Angeles County. In regard to the California Ambient Air Quality Standards, Los Angeles County has also been designated nonattainment for ozone, PM_{10}, $PM_{2.5}$, nitrogen dioxide, and lead. The Draft EIR evaluates the proposed project with respect to the State CEQA Guidelines. Construction and operations emissions were modeled and compared to the South Coast Air Quality Management District (SCAQMD) Significance Thresholds. Only the PM_{10} construction emissions were found to exceed the SCAQMD significance threshold by 5.6 lbs/day. Mitigation measures are described in the Draft EIR on page IV.B-23 and IV.B-24, which reduce air quality impacts below the threshold of significance. All other criteria pollutants are expected to be below the SCAQMD significance thresholds for both construction and operation phases. The proposed project is expected to be consistent with the regional 2012 Air Quality Management Plan. Please see pages IV.B-16, IV.B-17, and IV.B-19 of the Draft EIR for further information regarding the proposed project's consistency with state and regional air quality plans.

As discussed in Response to Comment Nos. E62-1 and E62-2, a community garden alternative was considered but withdrawn because it does not meet basic project objectives. Section 15126.6 of the CEQA Guidelines requires an EIR to describe a range of reasonable alternatives to a project or to the location of a project that would feasibly attain most of the basic objectives of a project but would avoid or substantially lessen any of the significant effects of a project, and evaluate the comparative merits of the alternatives. The discussion of alternatives, however, need not be exhaustive, but rather the discussion must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. An EIR is not required to consider alternatives that are deemed "infeasible." In developing alternatives, the following factors are considered: (i) ability to meet most of the basic project objectives, (ii) feasibility, or (iii) ability to avoid or substantially lessen significant environmental impacts.

As set forth in Section VI of the Draft EIR on pages VI-3 to VI-4, the Community Garden alternative, requested through public comments, considered development of the project for an alternate land use, specifically a community garden. However, this alternative was withdrawn from consideration as it does not meet the basic project objectives.

- A community garden or park would not attain the objective of providing a minimum of 480,000 square feet of light industrial space, consistent with the existing land use designation and zoning.

- A community garden or park would not provide light manufacturing jobs within 3 miles of an existing garment manufacturing labor force in the Southeast Los Angeles Community Plan Area.

- A community garden or park would not allow for development of an industrial park that is along the Alameda Corridor to take advantage of distribution efficiency opportunities.

- A community garden or park would not facilitate the ability of existing garment labor force, located in close proximity to the project site to utilize existing public transit system and other multi-modal transportation opportunities in vicinity of proposed project.

- A community garden or park would not preserve and/or redevelop the industrial sector of the Southeast Los Angeles Community Plan Area to accommodate emerging technologies, thus providing an enhanced employment base for the Community Plan Area's population.

- A community garden or park would not benefit the Southeast Los Angeles Community Plan area population as economic stimulation through employment opportunities, attracting commercial and industrial tenants to the area, and providing tax revenue for the City would not occur.

The proposed use of the property as light manufacturing is consistent with land use planning objectives articulated in the Southeast Los Angeles Community Plan. The City of Los Angeles Southeast Los Angeles Community Plan has designated the project site as light industrial. The land use designation discourages nonindustrial uses and uses that compromise job-producing potential. Plan Goal 3 supports sufficient land for a variety of industrial uses with maximum employment opportunities, which are safe for the environment and the work force, and which have minimal adverse impacts on adjacent uses. The South East Los Angeles Community Plan further supports the retention and redevelopment of the industrial sector through Objective 3-1, Policy 3-1.1, and Objective 3-2, Policy 3-2.1:

> **Objective 3-1** To provide for existing and future industrial uses which contribute job opportunities for residents and which minimize environmental and visual impacts to the community.
>
> **Policies 3-1.1** Designate lands for the continuation of existing industry and development of new industrial parks, research and development uses, light manufacturing, and similar uses which provide employment opportunities.
>
> **Objective 3-2** To retain industrial plan designations to maintain the industrial employment base for community residents and to increase it whenever possible.
>
> **Policies 3-2.1** The significant, large industrially planned parcels located in predominantly industrial areas associated with the railroad transportation facilities along Alameda and in the Slauson area should be protected from development by other uses which do not support the industrial base of the community, and the City.

The Southeast Los Angeles Community Plan's open space goals and objectives support the preservation of existing open space and the development of new open space, in balance with new development, to serve the recreational, environmental, health and safety needs of the community. The objectives further note that the "Plan Map designates lands for open spaces including parklands." As noted above, the project site is in an industrial corridor adjacent to the Alameda Corridor rail line, and it is not designated for open space on the plan map. The area surrounding the proposed project site is developed almost exclusively with light and heavy industrial uses, with limited small lot single family residential homes intermixed with light/industrial warehouse uses to the south and residential areas farther to the west. The Alameda Corridor rail line is located directly to the east and runs below grade in the project area, and also includes the Southern Pacific Railroad right-of-way across South Alameda Street. The Metro Blue Line light rail is located immediately to the west of the project site. The nearest designated open space is the Ross Snyder Recreation Center, located 0.2 mile west of the proposed project site.

Appendix XII and Section III.E of the EIR provide details of a 2003 settlement agreement between the prior owner and the City of Los Angeles to dedicate 2.6 acres of the property for maintenance of a park for recreation and park purposes, and subsequent amendment of the agreement to allow the proposed project to be developed. This amendment for the cash pledge provided the City or a nonprofit organization with the funds to dedicate a park in an alternative site more suitable for the community's agricultural use and park/recreational development functions. In order to satisfy the City's requirement for recreational use for the community, the City adopted Ordinance No. 181949 on November 23, 2011,[62] whereby funds were contributed to park/recreational development at more suitable alternative sites. As stated in the Draft EIR and summarized above, the project's cash pledge agreement will contribute to open space in the City in a more suitable location, while the project site would be developed consistent with its Community Plan designation, goals and policies, and the project objectives.

For the proposed project, GHG impacts were found to be less than significant, and air quality impacts were found to be less than significant after implementation of Mitigation Measures Air-1 through Air-7. These findings were discussed in detail in the Draft EIR in Section IV.B Air Quality and Section IV.D Greenhouse Gas Emissions.

COMMENT NO. E62-4

The California Environmental Quality Act (CEQA) was passed in 1970 to institute a statewide policy of environmental protection and makes environmental protection a mandatory part of every California state and local agency's decision making process. The City of Los Angeles not only has the discretionary power to reject this project, it must exercise this power to protect the environment.

RESPONSE NO. E62-4

The City of Los Angeles notes the comment on requirements pursuant of the California Environmental Quality Act (CEQA). The Draft EIR was prepared in accordance with Section 15151 of the State CEQA Guidelines, which defines the standards for adequacy of an EIR. Section 15151 states, "An EIR should be prepared with a sufficient degree of analysis to provide decision makers with information which enables them to make a decision which intelligently takes account of environmental consequences. An evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in the light of what is reasonably feasible. Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts. The courts have looked not for perfection but for adequacy, completeness, and a good faith effort at full disclosure."

COMMENT NO. E62-5

If it approves this project, the City of Los Angeles will be telling the world that it does not care about global climate change or the environment, and that it does not care about immigrants or the concerns of Angelenos.

RESPONSE NO. E62-5

Your comments have been noted. Your concerns will be taken into consideration by the decision-makers prior to taking action on the proposed project. The proposed project's global climate change impacts were

[62] Ordinance No. 181949, Report of the Chief Legislative Analyst for Council File No. 11-1524, and Motion, dated February 24, 2012.

analyzed quantitatively considering the construction and operational scenario, size, and location of the proposed project. The quantitative impact analysis of greenhouse gas emissions in comparison to California Air Resources Board (CARB) recommended thresholds can be found on page IV. D-10 of the Draft EIR. Impacts from GHG emissions were found to be less than significant. In addition, the project would implement mandatory measures outlined in the Los Angeles Green Building Code. Please refer to Section IV.D Greenhouse Gas Emissions for a more thorough impact analysis as it relates to the federal, state, and regional regulations.

COMMENT NO. E62-6

Accordingly, I ask that the Draft EIR be re-written to give fair consideration to all alternatives and that the environmental impact of each alternative be fully and fairly assessed. I also ask that the City of Los Angeles listen to the voices of the people of Los Angeles and reject the proposed development, thereby preserving the land for agricultural purposes.

RESPONSE NO. E62-6

Your comment regarding the assessment of alternatives for the proposed project has been noted. Section VI Alternatives of the Draft EIR considers clean fuel trucks or reduced truck operations as Alternatives B and C to the proposed project. The reduced truck operations alternative is the environmentally superior alternative. The Community Garden alternative, requested through public comments, considered development of the project for an alternate land use, specifically a community garden. However, this alternative was withdrawn from consideration as it does not meet the basic project objectives. As discussed in Response to Comment Nos. E62-1 and E62-2, the project's cash pledge agreement will contribute to open space in the City in a more suitable location, while the project site would be developed consistent with its Community Plan designation, goals and policies, and the project objectives.

COMMENT NO. E62-7

Please keep me informed of any further documents or public hearings on this issue.

RESPONSE NO. E62-7

Your name and contact information has been added to the project distribution list and you will be kept informed of future public hearings and documents.

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LETTER NO. E63

Eugene Ruyle Letter No. 2

COMMENT NO. E63-1

At its regularly scheduled meeting in Santa Cruz on March 8, 2015, the State Central Committee of the Peace and Freedom Party of California passed the following resolution in response to the Draft EIR for the 4015 South Alameda Street Project:

"We ask that the Draft EIR for the 4015 South Alameda Street Project be re-written to give fair consideration to all alternatives and that the City of Los Angeles listen to the voices of the people of Los Angeles and reject the proposed development, thereby preserving the land for agricultural purposes."

The Peace and Freedom Party is one of six ballot-qualified parties in the State of California, governed by the State Elections Code and its own Bylaws. Born from the civil rights and anti-war struggles of the 1960s, we are a working class party, committed to socialism, democracy, ecology, feminism, racial equality, and internationalism.

RESPONSE NO. E63-1

Your comment regarding the assessment of alternatives for the proposed project has been noted. Section 15126.6 of the CEQA Guidelines requires an EIR to describe a range of reasonable alternatives to a project or to the location of a project that would feasibly attain most of the basic objectives of a project but would avoid or substantially lessen any of the significant effects of a project, and evaluate the comparative merits of the alternatives. The discussion of alternatives, however, need not be exhaustive, but rather the discussion must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. An EIR is not required to consider alternatives that are deemed "infeasible." In developing alternatives, the following factors are considered: (i) ability to meet most of the basic project objectives, (ii) feasibility, or (iii) ability to avoid or substantially lessen significant environmental impacts.

As set forth in Section VI of the Draft EIR on pages VI-3 to VI-4, the Community Garden alternative, requested through public comments, considered development of the project for an alternate land use, specifically a community garden. However, this alternative was withdrawn from consideration as it does not meet the basic project objectives:

- A community garden or park would not attain the objective of providing a minimum of 480,000 square feet of light industrial space, consistent with the existing land use designation and zoning.
- A community garden or park would not provide light manufacturing jobs within 3 miles of an existing garment manufacturing labor force in the Southeast Los Angeles Community Plan Area.
- A community garden or park would not allow for development of an industrial park that is along the Alameda Corridor to take advantage of distribution efficiency opportunities.

- A community garden or park would not facilitate the ability of existing garment labor force, located in close proximity to the project site to utilize existing public transit system and other multi-modal transportation opportunities in vicinity of proposed project.

- A community garden or park would not preserve and/or redevelop the industrial sector of the Southeast Los Angeles Community Plan Area to accommodate emerging technologies, thus providing an enhanced employment base for the Community Plan Area's population.

- A community garden or park would not benefit the Southeast Los Angeles Community Plan area population as economic stimulation through employment opportunities, attracting commercial and industrial tenants to the area, and providing tax revenue for the City would not occur.

The proposed use of the property as light manufacturing is consistent with land use planning objectives articulated in the Southeast Los Angeles Community Plan. The City of Los Angeles Southeast Los Angeles Community Plan has designated the project site as light industrial. The land use designation discourages nonindustrial uses and uses that compromise job-producing potential. Plan Goal 3 supports sufficient land for a variety of industrial uses with maximum employment opportunities, which are safe for the environment and the work force, and which have minimal adverse impacts on adjacent uses. The South East Los Angeles Community Plan further supports the retention and redevelopment of the industrial sector through Objective 3-1, Policy 3-1.1, and Objective 3-2, Policy 3-2.1:

> **Objective 3-1** To provide for existing and future industrial uses which contribute job opportunities for residents and which minimize environmental and visual impacts to the community.
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> **Policies 3-1.1** Designate lands for the continuation of existing industry and development of new industrial parks, research and development uses, light manufacturing, and similar uses which provide employment opportunities.
>
> **Objective 3-2** To retain industrial plan designations to maintain the industrial employment base for community residents and to increase it whenever possible.
>
> **Policies 3-2.1** The significant, large industrially planned parcels located in predominantly industrial areas associated with the railroad transportation facilities along Alameda and in the Slauson area should be protected from development by other uses which do not support the industrial base of the community, and the City.

The Southeast Los Angeles Community Plan's open space goals and objectives support the preservation of existing open space and the development of new open space, in balance with new development, to serve the recreational, environmental, health and safety needs of the community. The objectives further note that the "Plan Map designates lands for open spaces including parklands." As noted above, the project site is in an industrial corridor adjacent to the Alameda Corridor rail line, and it is not designated for open space on the plan map. The area surrounding the proposed project site is developed almost exclusively with light and heavy industrial uses, with limited small lot single family residential homes intermixed with light/industrial warehouse uses to the south and residential areas farther to the west. The Alameda Corridor rail line is located directly to the east and runs below grade in the project area, and also includes the Southern Pacific Railroad right-of-way across South Alameda Street. The Metro Blue Line light rail is located immediately to the west of the project site. The nearest designated open space is the Ross Snyder Recreation Center, located 0.2 mile west of the proposed project site.

The applicant acknowledges the former interim use of the project site as a community garden that occurred under previous ownership. However, the use was discontinued in 2006, and the project site is currently vacant underutilized land in an industrially zoned area. Appendix XII and Section III.E of the Draft EIR provide details of a 2003 settlement agreement between the prior owner and the City of Los Angeles to dedicate 2.6 acres of the property for maintenance of a park for recreation and park purposes, and subsequent amendment of the agreement to allow the proposed project to be developed. This amendment for the cash pledge provided the City or a nonprofit organization with the funds to dedicate a park in a more appropriate location than the project site, which is industrially zoned and isolated to the west and east by major rail lines. The City Council accordingly determined that establishment of an active use park on the property is inappropriate due to the property's location in an industrial corridor, and authorized execution of a Cash Pledge Agreement whereby a payment in the amount of $3,573,365 was made to improve and provide recreational and park facilities at more suitable alternate sites in the vicinity of the property (see Report of the Chief Legislative Analyst, Ordinance No. 181949, and City Council Motion included in Appendix XII of the Draft EIR). The value of the cash pledge was determined on the basis of the pro rata value of the 2.6 acres to be set aside for recreational purposes pursuant to the settlement agreement relative to the overall purchase price of the project site. For further information on the site background and cash pledge agreement for park and recreational uses, please see pages IV-3 and IV-4 of the Corrections and Additions section of this Final EIR, and pages III-6 and III-7 and Appendix XII of the Draft EIR.

As stated in the Draft EIR and summarized above, the project's cash pledge agreement will contribute to open space in the City in a more suitable location, while the project site would be developed consistent with its Community Plan designation, goals and policies, and the project objectives.

COMMENT NO. E63-2

We further ask that you keep our Party informed of future revisions of the Draft EIR and any public hearings on this issue.

RESPONSE NO. E63-2

Your name and contact information has been added to the project distribution list and you will be kept informed of future public hearings and documents.

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LETTER NO. E64

Marilyn Sanchez

COMMENT NO. E64-1

I live in South Central Los Angeles, I been working for Poetry Clothing for 8 years. I started working as a receptionist and now I'm a production manager. It's a very clean and safe environment. I'm really happy working for Poetry. The best part about this job is to see people wearing our merchandise. I love that they are flexible with my schedule due to my daughter.

RESPONSE NO. E64-1

Your comment on the proposed project has been noted. Your concerns will be taken into consideration by the decision-makers prior to taking action on the proposed project.

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LETTER NO. E65

Fernando Santay

COMMENT NO. E65-1

I'm worked here at Impact factory for five months. I'm new in this factory. My position is cover stich operator. I do all kinds of work, style, and fashion. I also able to work with overlook, and single. As a cover stich operator, I have a lot of experience. I've worked on cover stich for about ten years. I like to work here, because the Impact factory is doing the better quality job that matches my experience. I plan to work here for a while, unless something comes up. I don't know everybody yet, but it seems I'm in the good spot. My wish for the boss and all the employees at the Impact factory to continue doing the best quality work on clothing fashion, and I'm looking forward to do my very best here are cover stich operator.

RESPONSE NO. E65-1

Your comment on the proposed project has been noted. Your concerns will be taken into consideration by the decision makers prior to taking action on the proposed project.

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LETTER NO. E66

Damien Serrano

COMMENT NO. E66-1

My name is Damian Serrano. I have worked at this company for 4 years. The time I've been employed here, I've been treated very well. Thanks to this company, I've been able to support my family and hope that the company continues to grow so we can continue working for a long time. I hope to give my family the best. Thank you IMPACT.

RESPONSE NO. E66-1

Your comment on the proposed project has been noted. Your concerns will be taken into consideration by the decision makers prior to taking action on the proposed project.

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LETTER NO. E67

Ramya Sivasubramanian, Esq., and Spencer Eldred
Natural Resources Defense Council (NRDC)
1314 2nd Street
Santa Monica, CA 90401

COMMENT NO. E67-1

Please find attached comments on behalf of the Natural Resources Defense Council concerning the Draft Environmental Impact Report for the proposed industrial warehouse project at 4051 Alameda Street on the site of the former South Central Farm (Case Number: ENV-2012-920-EIR, AA-2012-919-PMLA, DIR-2013-887-SPR). We appreciate your consideration of these comments and look forward to continued participation in the EIR process for this Project.

RESPONSE NO. E67-1

This comment provides introductory transmittal information, and does not directly address the contents of the Draft EIR. Comments on the project and Draft EIR follow with responses.

COMMENT NO. E67-2

On behalf of the Natural Resources Defense Council, we write to submit comments on the City Planning Department's Draft Environmental Impact Report ("DEIR") for the proposed industrial warehouse project at 4051 Alameda Street ("Industrial Project") on the site of the former South Central Farm (Case Number: ENV-2012-920-EIR, AA-2012-919-PMLA, DIR-2013-887-SPR). We believe the DEIR's analysis contains multiple inadequacies that must be addressed to comport with California Environmental Quality Act ("CEQA") requirements. We address some of these shortcomings in this letter.

RESPONSE NO. E67-2

Your comment regarding the Draft EIR for the proposed project has been noted. The following responses address the issues that the NDRC has identified in its comments.

COMMENT NO. E67-3

The DEIR's alternatives analysis is inadequate. First, the DEIR improperly excludes the community garden alternative from full analysis. Although the DEIR states that this alternative is infeasible due to existing zoning and land-use limitations (DEIR, at p. VI-3), such limitations are not applicable. The Light Industrial Zone applicable to these parcels specifically allows for agricultural uses. *See* Los Angeles Municipal Code, Chapter 1, Article 2, Section 12.19 ("M2" LIGHT INDUSTRIAL ZONE), as amended by Ord. No. 146,030 (7/11/74) (M2 Zone allows "[a]ny open lot use permitted in an 'A' or 'R' Zone, which does not involve the use of buildings or structures other than accessory buildings incident to the use of the land."); *see also* DEIR, at p. I-5; DEIR, p. II-3 (figure II.A-5). Moreover, notwithstanding the DEIR's conclusory statement to the contrary, this alternative *does* carry local community value and economic benefits.1 The full extent of such economic benefits would be identified and quantified *if* the DEIR performed a full analysis of this alternative, allowing for a more complete alternatives comparison and assessment.

2 Failure to analyze fully this alternative could also undercut other City and State planning and policy goals, which include facilitating community gardening and urban agriculture in low-income communities,

such as Southeast Los Angeles.3 A full alternative analysis would enable a more thorough assessment of this concern. For these reasons, we believe the DEIR improperly dismisses a full analysis of the community garden alternative, for which community groups have shown strong historic and current support.

RESPONSE NO. E67-3

Your comment regarding the assessment of alternatives for the proposed project has been noted. Section 15126.6 of the CEQA Guidelines requires an EIR to describe a range of reasonable alternatives to a project or to the location of a project that would feasibly attain most of the basic objectives of a project but would avoid or substantially lessen any of the significant effects of a project, and evaluate the comparative merits of the alternatives. The discussion of alternatives, however, need not be exhaustive, but rather the discussion must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. An EIR is not required to consider alternatives that are deemed "infeasible." In developing alternatives, the following factors are considered: (i) ability to meet most of the basic project objectives, (ii) feasibility, or (iii) ability to avoid or substantially lessen significant environmental impacts.

As set forth in Section VI of the Draft EIR on pages VI-3 to VI-4, the Community Garden alternative, requested through public comments, considered development of the project for an alternate land use, specifically a community garden. However, this alternative was withdrawn from consideration as it does not meet the basic project objectives:

- A community garden or park would not attain the objective of providing a minimum of 480,000 square feet of light industrial space, consistent with the existing land use designation and zoning.
- A community garden or park would not provide light manufacturing jobs within 3 miles of an existing garment manufacturing labor force in the Southeast Los Angeles Community Plan Area.
- A community garden or park would not allow for development of an industrial park that is along the Alameda Corridor to take advantage of distribution efficiency opportunities.
- A community garden or park would not facilitate the ability of existing garment labor force, located in close proximity to the project site to utilize existing public transit system and other multi-modal transportation opportunities in vicinity of proposed project.
- A community garden or park would not preserve and/or redevelop the industrial sector of the Southeast Los Angeles Community Plan Area to accommodate emerging technologies, thus providing an enhanced employment base for the Community Plan Area's population.
- A community garden or park would not benefit the Southeast Los Angeles Community Plan area population as economic stimulation through employment opportunities, attracting commercial and industrial tenants to the area, and providing tax revenue for the City would not occur.

The proposed use of the property as light manufacturing is consistent with land use planning objectives articulated in the Southeast Los Angeles Community Plan. The City of Los Angeles Southeast Los

Angeles Community Plan has designated the project site as light industrial. The land use designation discourages nonindustrial uses and uses that compromise job-producing potential. Plan Goal 3 supports sufficient land for a variety of industrial uses with maximum employment opportunities, which are safe for the environment and the work force, and which have minimal adverse impacts on adjacent uses. The South East Los Angeles Community Plan further supports the retention and redevelopment of the industrial sector through Objective 3-1, Policy 3-1.1, and Objective 3-2, Policy 3-2.1:

> **Objective 3-1** To provide for existing and future industrial uses which contribute job opportunities for residents and which minimize environmental and visual impacts to the community.
>
> **Policies 3-1.1** Designate lands for the continuation of existing industry and development of new industrial parks, research and development uses, light manufacturing, and similar uses which provide employment opportunities.
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> **Objective 3-2** To retain industrial plan designations to maintain the industrial employment base for community residents and to increase it whenever possible.
>
> **Policies 3-2.1** The significant, large industrially planned parcels located in predominantly industrial areas associated with the railroad transportation facilities along Alameda and in the Slauson area should be protected from development by other uses which do not support the industrial base of the community, and the City.

The City acknowledges the comment that agricultural uses are permissible in the M-2 zone, which incorporates open lot uses. The Southeast Los Angeles Community Plan's open space goals and objectives support the preservation of existing open space and the development of new open space, in balance with new development, to serve the recreational, environmental, health and safety needs of the community. The objectives further note that the "Plan Map designates lands for open spaces including parklands." As noted above, the project site is in an industrial corridor adjacent to the Alameda Corridor rail line, and it is not designated for open space on the plan map. The area surrounding the proposed project site is developed almost exclusively with light and heavy industrial uses, with limited small lot single family residential homes intermixed with light/industrial warehouse uses to the south and residential areas farther to the west. The Alameda Corridor rail line is located directly to the east and runs below grade in the project area, and also includes the Southern Pacific Railroad right-of-way across South Alameda Street. The Metro Blue Line light rail is located immediately to the west of the project site. The nearest designated open space is the Ross Snyder Recreation Center, located 0.2 mile west of the proposed project site.

The applicant acknowledges the former interim use of the project site as a community garden that occurred under previous ownership. However, the use was discontinued in 2006, and the project site is currently vacant underutilized land in an industrially zoned area. Appendix XII and Section III.E of the Draft EIR provide details of a 2003 settlement agreement between the prior owner and the City of Los Angeles to dedicate 2.6 acres of the property for maintenance of a park for recreation and park purposes, and subsequent amendment of the agreement to allow the proposed project to be developed. This amendment for the cash pledge provided the City or a nonprofit organization with the funds to dedicate a park in a more appropriate location than the project site, which is industrially zoned and isolated to the west and east by major rail lines. The City Council accordingly determined that establishment of an active use park on the property is inappropriate due to the property's location in an industrial corridor, and authorized execution of a Cash Pledge Agreement whereby a payment in the amount of $3,573,365 was made to improve and provide recreational and park facilities at more suitable alternate sites in the vicinity of the property (see Report of the Chief Legislative Analyst, Ordinance No. 181949, and City Council

Motion included in Appendix XII of the Draft EIR). The value of the cash pledge was determined on the basis of the pro rata value of the 2.6 acres to be set aside for recreational purposes pursuant to the settlement agreement relative to the overall purchase price of the project site. For further information on the site background and cash pledge agreement for park and recreational uses, please see pages IV-3 and IV-4 of the Corrections and Additions section of this Final EIR, and pages III-6 and III-7 and Appendix XII of the Draft EIR.

As stated in the Draft EIR and summarized above, the project's cash pledge agreement will contribute to open space in the City in a more suitable location, while the project site would be developed consistent with its Community Plan designation, goals and policies, and the project objectives.

COMMENT NO. E67-4

The DEIR also improperly omits the park or recreation alternative from full analysis. The Southeast Los Angeles Community Plan, within which these parcels are located, highlights the need for additional open space in the community and sets policies, goals, and objectives for preserving existing open space and developing or utilizing additional open space. *See*, *e.g.*, Southeast LA Community Plan at p. III-16:

The community is still deficient in the number and location of both community and neighborhood parks.... [Policy:] Encourage the cooperation between ... other public and private entities ... in order to develop and utilize other open space opportunities for the community.

and *id.* at p. III-17:

[v]ery little, important open space areas do exist separate from land under the control of the City... Open Space is important due to its role in both physical and environmental protection... Goal 5: A community with sufficient open space in balance with new development to serve the recreational, environmental, health and safety needs of the community and to protect environmental and aesthetic resources ... Objective 5-1: To preserve existing open space resources and where possible develop new open space. Polic[y] 5-1.1 Encourage the retention of passive and visual open space which provides a balance to the urban development of the Plan Area.

See also DEIR, at p. IV.A-11. Turning the current vacant lot and former community farm into an Industrial Project would not only undercut these planning goals, but would also exacerbate air quality, noise, and traffic burdens in this community. Particularly given the history of agricultural and open space use *at this site*, as well as the strong need and ongoing demand for community agriculture and open space uses here, omitting a full analysis of these alternatives to the Industrial Project is a significant failure. The DEIR also fails to analyze adequately other potential alternatives to the Industrial Project.

RESPONSE NO. E67-4

Your comment regarding assessment of alternatives for the proposed project has been noted. The project applicant recognizes the need for open space in the community and a cash pledge was made to support maintenance and improvement of local parks, such that there would be no potential for a net adverse effect on recreation facilities that serve the area in which the project is located.

Pursuant to the 2003 settlement agreement regarding the Lancer Property (proposed project site), Libaw-Horowitz pledged to dedicate approximately 2.6 acres of the property back to the City of Los Angeles Department of Recreation and Parks or to a nonprofit community organization that would use and maintain the property for recreation and park purposes. The sale of the Lancer Property included the pledged 2.6 acres. The amendment of the pledge agreement to substitute a cash pledge for the dedication

of the 2.6 acres allows for the proposed industrial park to be developed and provides the City with the funds to dedicate a park in a more appropriate location than the proposed project site, which is industrially zoned, isolated to the east and west by major rail lines.. The City Council accordingly authorized execution of a Cash Pledge Agreement whereby a payment in the amount of $3,573,365 was made to improve and provide recreational and park facilities in the vicinity of the property (see Report of the Chief Legislative Analyst, Ordinance No. 181949, and City Council Motion included in Appendix XII of the Draft EIR). The value of the cash pledge was determined on the basis of the pro rata value of the 2.6 acres to be set aside for recreational purposes pursuant to the settlement agreement relative to the overall purchase price of the project site.

As noted by the commenter, the Southeast Los Angeles Community Plan's open space goals and objectives support the preservation of existing open space and the development of new open space, in balance with new development, to serve the recreational, environmental, health and safety needs of the community. The objectives and policies further note that the "Plan Map designates lands for open spaces including parklands." As noted above, the project site is in an industrial corridor adjacent to the Alameda Corridor rail line, and it is not designated for open space on the plan map. The area surrounding the proposed project site is developed almost exclusively with light and heavy industrial uses, with limited small lot single family residential homes intermixed with light/industrial warehouse uses to the south and residential areas farther to the west. The Alameda Corridor rail line is located directly to the east and runs below grade in the project area, and also includes the Southern Pacific Railroad right-of-way across South Alameda Street. The Metro Blue Line light rail is located immediately to the west of the project site. The nearest designated open space is the Ross Snyder Recreation Center, located 0.2 mile west of the proposed project site.

The project site is designated as Light Industrial according to the Southeast Los Angeles Community Plan Area of the City's General Plan and not Open Space. The designated purpose of the property and its proposed use as light manufacturing is consistent with land use planning objectives articulated in the adopted Southeast Los Angeles Community Plan. The Southeast Los Angeles Community Plan supports the redevelopment and retention of the industrial sector through Objective 3-1, Policy 3-1.1, and Objective 3-2, Policy 3-2.1:

> **Objective 3-1** To provide for existing and future industrial uses which contribute job opportunities for residents and which minimize environmental and visual impacts to the community.
>
> **Policies 3-1.1** Designate lands for the continuation of existing industry and development of new industrial parks, research and development uses, light manufacturing, and similar uses which provide employment opportunities.
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> **Policies 3-2.1** The significant, large industrially planned parcels located in predominantly industrial areas associated with the railroad transportation facilities along Alameda and in the Slauson area should be protected from development by other uses which do not support the industrial base of the community, and the City.

Section 15126.6 of the CEQA Guidelines requires an EIR to describe a range of reasonable alternatives to a project or to the location of a project that would feasibly attain most of the basic objectives of a project but would avoid or substantially lessen any of the significant effects of a project, and evaluate the comparative merits of the alternatives. The discussion of alternatives, however, need not be exhaustive,

but rather the discussion must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. An EIR is not required to consider alternatives that are deemed "infeasible." In developing alternatives, the following factors are considered: (i) ability to meet most of the basic project objectives, (ii) feasibility, or (iii) ability to avoid or substantially lessen significant environmental impacts.

As discussed in Section VI, *Alternatives to the Proposed Project*, of the Draft EIR, and in Response to Comment No. E67-3 above, the community garden alternate land use alternative and park/recreation alternate land use were withdrawn from further analysis in the Draft EIR as they would not meet the basic objectives of the project as shown below:

- A community garden or park would not attain the objective of providing a minimum of 480,000 square feet of light industrial space, consistent with the existing land use designation and zoning.

- A community garden or park would not provide light manufacturing jobs within 3 miles of an existing garment manufacturing labor force in the Southeast Los Angeles Community Plan Area.

- A community garden or park would not allow for development of an industrial park that is along the Alameda Corridor to take advantage of distribution efficiency opportunities.

- A community garden or park would not facilitate the ability of existing garment labor force, located in close proximity to the project site to utilize existing public transit system and other multi-modal transportation opportunities in vicinity of proposed project.

- A community garden or park would not preserve and/or redevelop the industrial sector of the Southeast Los Angeles Community Plan Area to accommodate emerging technologies, thus providing an enhanced employment base for the Community Plan Area's population.

- A community garden or park would not benefit the Southeast Los Angeles Community Plan area population as economic stimulation through employment opportunities, attracting commercial and industrial tenants to the area, and providing tax revenue for the City would not occur.

For the proposed project, GHG impacts were found to be less than significant, and air quality impacts were found to be less than significant after implementation of Mitigation Measures Air-1 through Air-7. These findings were discussed in detail in the Draft EIR in Section IV.B Air Quality and Section IV.D Greenhouse Gas Emissions. The Draft EIR also concluded that noise from the proposed project would have a less than significant impact. Please refer to Appendix IS-1, Noise Technical Report, in Appendix III of the Draft EIR, for further information. To address the traffic burdens, implementation of Mitigation Measures Traffic-1 through Traffic-5 would reduce impacts to traffic and transportation facilities during construction and operation of the proposed project to below the level of significance with the exception of traffic impacts at the intersection of Alameda Street and East Washington Boulevard. Please refer to Section IV.G Traffic of the Draft EIR. Traffic mitigation measures are listed on page IV.G-18.

COMMENT NO. E67-5

Finally, the DEIR fails to analyze adequately both the Industrial Project's air quality and greenhouse gas ("GHG") impacts and the possible and necessary mitigations for those impacts. As the DEIR admits, the

Industrial Project will result in high amounts of pollutants such as VOCs, NOx, and particulate matter. *See* DEIR, at pp. IV.B-1–IV.B-13. It will result in significant air quality impacts. DEIR, at p. IV.B-16. It will also result in thousands of tons of GHG emissions. DEIR, at p. IV.D-10. These impacts are especially troubling given the lack of adequate mitigation, and the proximity to sensitive receptors (who are as close as 153 feet from the site). More than just analysis of the project's impacts, CEQA also requires the consideration of its *cumulative* impacts. Based on existing air quality burdens in the area, any impacts from the Project should be fully mitigated. Yet, the DEIR specifies only minimal air quality mitigations and *no* mitigation for the GHG emissions from the Industrial Project.

RESPONSE NO. E67-5

Your comment on the air quality and greenhouse gas aspects of the project implementation has been noted. As the Draft EIR noted, construction related air quality impacts are fully mitigatable.

Air Quality Impact

Based on the emissions modeling and results of the analysis highlighted in the *Air Quality Health Risk Assessment for the Proposed Alameda Industrial Park* dated September 17, 2014 (referred to here as the HRA), the proposed project anticipates 351 truck trips. Alternative C, Reduced Truck Operations, is the environmentally superior alternative and proposes limiting truck trips to 75 per day:

a. The traffic study addendum (October 3, 2014, Appendix XI to the DEIR)[63] shows that even at 351 truck trips per day, the level of service at the surrounding intersections is not expected to be significantly impacted – service would remain at a Level of Service D with the exception of traffic impacts at the intersection of Alameda Street and East Washington Boulevard. The ITE rates of trip generation are based on nation-wide survey at similar existing facilities, and used to estimate a worst case scenario of traffic increases on the circulation system due to a new project. These rates are often subject to adjustments to account for more locally available information, project specific data, existing site conditions, consideration of specific nature of land uses and other relevant data. Alternative C was a result of such considerations for the project's trip generation, and deemed to be the most likely scenario of new traffic to be added onto the surrounding circulation system due to the development of this project.
b. Thus, there will be no meaningful changes to emissions from idle time due to the addition of project truck traffic.
c. The applicant has specified that truck traffic will consist of cargo vans and box trucks only; no large diesel semi-tractor trucks are included in the daily traffic to the site, thus further reducing potentially harmful emissions.
d. The HRA conservatively assumed 351 trucks per day based on the proposed project and not Alternative C, Reduced Truck Operations.
e. Per the approved EMFAC 2011 emissions model, the size vehicles anticipated could be either diesel or gasoline powered. EMFAC distributions specific to Los Angeles County show that 9 percent of these vehicles on average (i.e., 31 trucks per day) are expected to be diesel powered.
f. Per the HRA and assuming 351 truck trips per day, the maximum cancer risk is estimated to be only 3 percent of the allowable threshold of 10 in one million.
g. With Alternative C, Reduced Truck Operations, truck trips would be limited to 75 truck trips per day. As a result, the maximum cancer risks drop to 0.6 percent of the allowable threshold.

[63] Sage Strategies, LLC. October 3, 2014. Appendix XI. Addendum to Traffic Impact Study. Prepared by Traffic Design, Inc.

Emissions of criteria pollutants generated during construction and operation of the proposed project are calculated to be well below acceptable thresholds except with respect to PM_{10} emissions during construction, which can be fully mitigated through implementation of the following mitigation measures:

- Air-1: During the construction phase of the project, the project applicant shall apply soil stabilizers for all unpaved roads (80 percent reduction in $PM_{2.5}$ and PM_{10} emissions).

- Air-2: During the construction phase of the project, the project applicant shall water exposed areas three times a day (61 percent reduction in $PM_{2.5}$ and PM_{10} emissions).

- Air-3: During the construction phase of the project, the project applicant shall ensure that vehicular speeds are reduced to 15 miles per hour on unpaved roads.

Emissions of Volatile Organic Compounds (VOCs) during construction will be further reduced below acceptable levels through implementation of the following mitigation measure:

- Air-7: The project applicant shall ensure low VOC paint is applied for interior and exterior uses [250 EF (g/L)]

Construction-related toxic air contaminants (TACs) from diesel particulate emissions will be short-lived (3 months), and therefore do not require a Health Risk Assessment from the Office of Environmental Health Hazard Assessment (OEHHA). OEHHA looks at long-term (70-year) cancer impacts so the impact of short-term TACs from the construction of the proposed project is considered less than significant.

For operations of the proposed project, there will be an estimated 31 diesel fueled trucks/day out of a total 351 total truck trips/day under the most conservative scenario. Because this is greater than 100 daily truck trips, a refined Health Risk Assessment for operational impacts was conducted that identified sensitive receptors and individual cancer risk. The maximum potential cancer risk is 0.3 in a million. This is only 3 percent of the cancer risk threshold of 10 in a million. Therefore, the proposed project would not result in the significant human health risks related to diesel emissions. The alternatives with clean fuel trucks and reduced truck operations would result in even fewer diesel emissions.

Operational emissions generated from mobile sources will be further reduced below acceptable levels through implementation of the following mitigation measures:

> Air-4
> The project applicant shall establish incentives for increased transit frequency~~.~~ in compliance with the transportation demand management and trip reduction measures set forth in Section 12.26J of the Los Angeles Municipal Code, which include the following requirements for non-residential projects with more than 100,000 square feet of floor area.
>
> **(a) Development in excess of 25,000 square feet of gross floor area.** The owner shall provide a bulletin board, display case, or kiosk (displaying transportation information) where the greatest number of employees are likely to see it. The transportation information displayed should include, but is not limited to, the following:
>
> (1) Current routes and schedules for public transit serving the site;
>
> (2) Telephone numbers for referrals on transportation information including numbers for the regional ridesharing agency and local transit operations;

(3) Ridesharing promotion material supplied by commuter-oriented organizations;

(4) Regional/local bicycle route and facility information;

(5) A listing of on-site services or facilities which are available for carpoolers, vanpoolers, bicyclists, and transit riders.

(b) Development in excess of 50,000 square feet of gross floor area. The owner shall comply with Paragraph (a) above and in addition shall provide:

(1) A designated parking area for employee carpools and vanpools as close as practical to the main pedestrian entrance(s) of the building(s). This area shall include at least ten percent of the parking spaces required for the site. The spaces shall be signed and striped sufficient to meet the employee demand for such spaces. The carpool/vanpool parking area shall be identified on the driveway and circulation plan upon application for a building permit;

(2) One permanent, clearly identified (signed and striped) carpool/vanpool parking space for the first 50,000 to 100,000 square feet of gross floor area and one additional permanent, clearly identified (signed and striped) carpool/vanpool parking space for any development over 100,000 square feet of gross floor area;

(3) Parking spaces clearly identified (signed and striped) shall be provided in the designated carpool/vanpool parking area at any time during the building's occupancy sufficient to meet employee demand for such spaces. Absent such demand, parking spaces within the designated carpool/vanpool parking area may be used by other vehicles;

(4) No signed and striped parking spaces for carpool/vanpool parking shall displace any handicapped parking;

(5) A statement that preferential carpool/vanpool spaces are available on-site and a description of the method for obtaining permission to use such spaces shall be included on the required transportation information board;

(6) A minimum vertical clearance of 7 feet 2 inches shall be provided for all parking spaces and accessways used by vanpool vehicles when located within a parking structure;

(7) Bicycle parking shall be provided in conformance with Section 12.21A16 of this Code.

(c) Development in excess of 100,000 square feet of gross floor area. The owner shall comply with Paragraphs (a) and (b) above and shall provide:

(1) A safe and convenient area in which carpool/vanpool vehicles may load and unload passengers other than in their assigned parking area;

(2) Sidewalks or other designated pathways following direct and safe routes from the external pedestrian circulation system to each building in the development;

(3) If determined necessary by the City to mitigate the project impact, bus stop improvements shall be provided. The City will consult with the local bus service providers in determining

appropriate improvements. When locating bus stops and/or planning building entrances, entrances shall be designed to provide safe and efficient access to nearby transit stations/stops;

(4) Safe and convenient access from the external circulation system to bicycle parking facilities on-site.

Air-5
The project applicant shall improve the pedestrian network for the project site to internally link all uses and connect with existing or planned external streets and pedestrian facilities contiguous with the project site. The project applicant shall identify street trees and streetscape improvements to connect site access points to nearby transit and bicycle facilities.

Air-6
The project applicant shall provide traffic calming measures through street improvements. The applicant will be dedicating additional right-of-way along 41st Street, Alameda Street, and Martin Luther King, Jr. Boulevard. In connection with the street dedications and development of the proposed project, the applicant will be upgrading existing sidewalks, curb and gutter, as well as street trees, street lighting, and street furniture around the entire perimeter of the property in consultation with the City Department of Transportation and Department of Public Works. Upgrades to the existing sidewalks will require new curb cuts and crosswalks and the replacement of existing traffic signals at intersections. Additional traffic control devices will be installed as necessary and required to facilitate safe traffic circulation in and around the proposed project site.

In addition to the above mitigation measures, emissions generated from mobile sources will be further reduced below acceptable levels as a result of the On-Road Heavy-Duty Diesel Vehicles Regulation Amendments approved by CARB in April 2014. The main objective of this regulation is to reduce emissions from heavy-duty diesel trucks and buses by installing new filters and upgrading engines. The regulation mandates that all new heavy-duty trucks and buses must have particulate matter filters that meet CARB requirements by January 1, 2012. Lighter and older heavy trucks must be replaced starting in January 1, 2015. All trucks and buses are required to have model year 2010 engines or equivalent by January 1, 2023. The scope of the regulation includes both public and private vehicles. This language has been added to Section IV, Corrections and Additions on Page IV-9.

For further information on the Air Quality impact analysis, please see pages IV.B-15 to IV.B-24 of the Draft EIR.

Greenhouse Gas Emissions

Based on emissions modeling, unmitigated construction emissions equal approximately 643.22 metric tons of CO_{2e}. Operational emissions equal approximately 2,090.25 metric tons of CO_{2e} per year. The operational GHG emissions can be attributed to mobile sources associated with the proposed project's approximate 353,375 square feet of warehouse space. In the absence of regional thresholds adopted for GHG emissions, the California Air Resources Board (CARB) suggested threshold of 25,000 metric tons of CO_{2e} per year was utilized for the quantitative analysis of GHG emissions. Additionally, based on the suggested thresholds proposed by the California Air Pollution Control Officers Association (CAPCOA), the proposed project would be expected to have the potential to result in significant impacts related to global climate change if the proposed project emits more than 25,000 metric tons of CO_{2e} per year. Because the proposed project's construction and operational emissions are not expected to exceed the CARB recommended threshold of 25,000 metric tons of CO_{2e} per year or the SCAQMD's significance threshold of 10,000 MT CO_{2e}/year for industrial projects, mitigation measures are not required.

Compliance with the following mandatory measures in the Los Angeles Green Building Code will further reduce the project's direct GHG emissions below acceptable levels:

- 99.05.106.5.3.1. Electric Vehicle Supply Wiring. Provide a minimum number of 208/240 V 40 amp, ground AC outlet(s), that is equal to 5 percent of the total number of parking spaces, rounded up to the next whole number. The outlet(s) shall be located in the parking area.

- 99.05.203.1.3. Energy Efficiency. Exceed California Energy Code requirements, based on the 2008 Energy Efficiency Standards, by 15 percent.

- 99.05.210.1. ENERGY STAR Equipment and Appliances. Residential grade equipment and appliances provided and installed shall by ENERGY STAR labeled if ENERGY STAR is applicable to the equipment or appliance.

- 99.05.211.4. Prewiring for Future Electrical Solar System. Install conduit from building roof, eave, or other locations approved by the Department to the electrical service equipment. The conduit shall be labeled as per the Los Angeles Fire Department requirements.

- 99.05.303.2. Twenty Percent Savings. A schedule of plumbing fixtures and fixture fittings that will reduce the overall use of potable water within the building by 20 percent shall be provided. The reduction shall be based on the maximum allowable water use per plumbing fixture, and fittings as required by the California Building Standards Code.

- 99.05.410.1. Recycling by Occupants. Provide readily accessible areas that serve the entire building and are identified for the depositing, storage, and collection of non-hazardous materials for recycling, including (at a minimum) paper, corrugated cardboard, glass, plastics and metals.

For further information on the GHG impact analysis, please see pages IV.D-9 to IV.D-13 of the Draft EIR.

There are 64 identified sensitive receptors within a 500-foot radius of the proposed project site. See Section IV.B, *Air Quality*, specifically Figure IV.B-1, *Sensitive Receptors* and Figure IV.B-2, *Receptor Grid and Sensitive Receptors*. The 500 foot radius chosen to evaluate sensitive receptors by a distribution center is established by CARB's Air Quality and Land Use Handbook. The sensitive receptors include residences located to the west, southwest, and south of the proposed project site. Schools, recreation centers, and medical facilities are included in the CARB's definition of sensitive receptors, but they are all located outside of the 500 foot radius of the proposed project site. In addition, an Air Quality Health Risk Assessment (Appendix V in Volume IV of the Draft EIR) was performed in relation to specific sensitive receptors. This analysis identified the point of maximum impact to all receptors, residential receptors, sensitive receptors, and receptors of interest. Table IV.B-11 in the Draft EIR contains a summary of the health impact results from toxic air contaminants like diesel particulate matter on these key sensitive receptors.

There are 11 projects expected to be implemented within a 2-mile radius of the proposed project during the construction period of the proposed project. Cumulative impacts to air quality are expected to be below the level of significance with the implementation of the Mitigation Measures, Air-1 to Air-7 in the Draft EIR Section IV.B Air Quality.

COMMENT NO. E67-6

The requirement for a full and thorough analysis of the environmental impacts, mitigations, and alternatives to a proposed project is at the heart of CEQA. Given the inadequacies with the DEIR discussed above (and by other commenters), we request the City redo its DEIR analyses to address the full and proper range of alternatives and mitigations. Only after this thorough analysis of the Industrial Project's impacts, alternatives, and all available mitigations, can the community and decision-makers fully understand and be in a position to assess the Industrial Project.

RESPONSE NO. E67-6

Your comment regarding the adequacy of the analysis of the proposed project's environmental impacts, mitigation, and alternatives has been noted. The project applicant has complied with all relevant requirements under CEQA for disclosure, scoping, and impact discussion. A range of alternatives was considered and those best able to meet project objectives were carried forward for additional discussion under the Draft EIR. For further information on the range of alternatives and mitigations, please see Response to Comment Nos. E67-3 and E67-4, above. We appreciate your consideration and participation in the EIR process for the project.

COMMENT NO. 67-7

We appreciate your consideration of these comments and look forward to continued participation in the EIR process for this Project.

RESPONSE NO. E67-7

Your name and contact information has been added to the project distribution list and you will be kept informed of future public hearings and documents.

LETTER NO. E68

Nancy Smith

COMMENT NO. E68-1

South LA Sweatshops will have long term detrimental health impact to the residents of South Central Los Angeles

The City Planning Department has announced its intention to allow 4 warehouses to be built with a substandard Draft Environmental Impact Report (Case Number: ENV-2012-920-EIR, AA-2012-919-PMLA, DIR-2013-887-SPR), a move Farm representatives and the community say will have long term detrimental health impacts for local South LA residents. Plans call for 4 warehouse facilities that will draw some 75 diesel big rigs into the area every day, creating an intolerable concentration of diesel fumes and particulate matter in a neighborhood in a warehousing district already saturated with such exhaust, posing the danger of increased risks of cancer, emphysema, asthma, and increased hospitalizations to poor people of color who live in the district. South Central Farm representative Tezozomoc said, "This is an unmistakable and undeniable threat to the health and well being of the people who live here, and that the City Planning Department has accepted a substandard Draft Environmental Impact Report on behalf of PIMA is a clear cut example of environmental racism." I call on the city, " to unconditionally reject the DEIR and return the land to the community to anchor an environmental justice project to begin to clean up the community".

RESPONSE NO. E68-1

Your comment in regard to the health risks from the diesel truck trips generated by the proposed project has been noted. The construction phase air quality impact analysis can be found in the Impact Analysis portion of Section IV.B *Air Quality* of the Draft EIR. Construction related toxic air contaminants (TACs) from diesel particulate emissions will be short-lived (3 months), and therefore do not require a Health Risk Assessment (HRA) from the Office of Environmental Health Hazard Assessment (OEHHA). Diesel particulate emissions only affect the population on a long-term (70-year) basis for cancer impacts, so the impact of short-term TACs from the construction of the proposed project is considered less than significant, as analyzed in Section IV.B (pages IV.B-15 through -18) of the Draft EIR. Construction emissions were analyzed for the six main criteria air pollutants as evident in Table IV.B-8. Emissions from VOCs, NOx, CO, SOx, and $PM_{2.5}$ were calculated to be below the SCAQMD significance threshold. PM_{10}, does have a significant impact during the construction phase, but it can be reduced to below the level of significance with mitigation measures.

For the operations of the proposed project, Section IV.G, *Transportation/Traffic* of the Draft EIR considered 351 truck trips/day based on Institute of Transportation Engineers guidelines. Of the 351, EMFAC 2011, an emissions factor model, estimates that on average 9 percent of the total trucks are diesel fueled trucks for an estimate of 31 diesel fueled trucks, as mentioned in the Human Health Risk Analysis portion of Section IV.B *Air Quality* of the Draft EIR. Because the total daily truck trips are greater than 100, a refined Health Risk Assessment for operational impacts was conducted that identified sensitive receptors and individual cancer risk. Diesel particulate is the majority of health risk among the TACs emitted from both diesel- and gasoline-fueled vehicles, so only diesel particulate emissions are considered for the Health Risk Assessment. As described in Section IV.B (page IV.B-22) of the Draft EIR, the resulting maximum potential cancer risk is 0.3 in a million, which is only 3 percent of the cancer risk threshold of 10 in a million as set by the South Coast Air Quality Management District Rule 1401. In addition to the cancer risk, operational emissions associated with the proposed project for the six main criteria air pollutants are quantified in Table IV.B-9, Unmitigated Estimated Daily Operational Emissions,

of the Draft EIR, and were found to be below thresholds of significance established by SCAQMD. Therefore, the proposed project would not result in significant human health risks related to diesel emissions. Further details on the air quality impacts analysis in the operational phase can be found in pages IV.B18 –B22 of the Draft EIR.

With Alternative C, Reduced Truck Operations, truck trips would be limited to 75 truck trips per day. As a result, the maximum cancer risk drops to 0.6 percent of the allowable threshold. The alternatives with clean fuel trucks and reduced truck operations would result in fewer diesel emissions.

CEQA centers on whether a project may have a significant effect on the physical environment (CEQA Guidelines, 15064(d)). The purpose of an environmental impact report is to identify the significant effects on the environment of a project, to identify alternatives to the project, and to indicate the manner in which those significant effects can be mitigated or avoided (Pub. Res. Code, §21002.1 subd. (a)). Environmental justice is not considered an area of impact under CEQA, and CEQA does not ask that a project mitigate preexisting conditions. As noted in CEQA Guidelines Section 15064(b), the significance of an activity may vary with the environmental setting. Where there already is a high pollution burden on a community, the relevant question is whether an additional amount of pollution should be considered significant in light of the serious nature of the existing problem.[64]

The Existing Conditions section in Section IV.B *Air Quality* of the Draft EIR includes ambient air quality data gathered from the local air quality monitoring stations. The average concentrations and days above the standard for each criteria air pollutant are listed in Table IV.B-6 *Summary of 2010-2012 Ambient Air Quality Data in the Proposed Project Vicinity* on page IV.B-11 of the Draft EIR. The Air Quality impact analysis relative to the impacts of the proposed project has been further detailed above in this Response to Comment No. E68-1, and is located in Section IV.B *Air Quality* of the Draft EIR. In the Draft EIR, sensitive receptors are defined on page IV.B-11. There are two maps showing their locations: Figure IV.B-1 *Sensitive Receptors* and Figure IV. B-2 *Receptor Grid and Sensitive Receptors*.

COMMENT NO. E68-2

It is clear that Los Angeles City has failed the residents of South LA by considering a substandard DEIR. In 2008 the City of Los Angeles reviewed a project submitted by Horowitz to do one warehouse that encompassed 437,196 sq. ft. (see Case No. ENV-2008-799-MND, VTT-61482, DIR-2008-841-SPR, aka 41st and Alameda Warehouse Project) and at that time there would be 264 truck trips per day. In the recent DEIR PIMA will be developing 481,022 sq. ft. of warehouse space; comprised of 4 buildings and over 2000 car trips per day. In PIMA's proposal they claim a mere 75 trip trucks a day. There is a difference of 189 truck trips per days for a warehouse space that is 10% larger. There is a difference of 70% in truck trips. What is problematic with this assumption is that all further analysis will be based on the underspecified 75 truck trips per day. While this under estimation of the truck trips may get the project approved by the City; the city under Jan Perry has supported this project, it will have long negative impact on the residents of South Los Angeles. In the realm of Air Quality Health Risk Assessment the truck trips are further down estimated to 31 diesel fueled trucks per day. The Kleinfelder's Health Risk Analysis is faulty because it also assumes a degraded amount of truck trips per day; 75 truck trips per day.

[64] Harris, Kamala D. 10 July 2012. *Environmental Justice at the Local and Regional Level: Legal Background*. Prepared by State of California Department of Justice. Available at: http://oag.ca.gov/sites/all/files/agweb/pdfs/environment/ej_fact_sheet.pdf

RESPONSE NO. E68-2

The City of Los Angeles has noted the concern about the discrepancy in the number of truck trips and the resulting health risks. A total of 351 truck trips is assumed in the Air Quality Health Risk Assessment (Appendix V in Volume IV of the Draft EIR) and Section IV.B, *Air Quality*, of the Draft EIR based on the Addendum to the Traffic Impact Study (Appendix IX in Volume VI of the Draft EIR). Of the 351 truck trips, EMFAC 2011 estimates that on average 9 percent of the total trucks are diesel fueled trucks for an estimate of 31 diesel-fueled trucks as mentioned in the Human Health Risk Analysis portion of Section IV.B *Air Quality* of the Draft EIR.

The Draft EIR states on page IV.G-13 that

> *It is calculated that the proposed project will generate approximately 1,966 net passenger car equivalent (PCE) trips per average day. The average weekday net new peak hour PCE trips will be approximately 179 trips during the a.m. peak hour and 190 trips during the p.m. peak hours (Figure IV.G-6, Distribution of Project Traffic, and Figure IV.G-7, Existing [2014] plus Project Traffic Volumes). The traffic analysis also considered the distribution of trips during a.m. and p.m. peak hours in the vicinity of the proposed project (Figure IV.G- 8, Project Traffic at Driveways and Adjacent Intersections).*
>
> *While these estimates were developed based on the ITE's Trip Generation Manual, the project applicant has indicated that truck trips associated with operation of the proposed project would not exceed 75 daily truck trips, which has therefore been analyzed as Alternative C in this Draft EIR (see Attachment E to the Initial Study, which is Appendix III of this Draft EIR).*

The 75 truck trips identified in Alternative C stem from the existing operations at various facilities, which will be consolidated in the proposed project. Currently, there is a maximum of 33 truck trips/day total for the various facilities. The proposed project build out is not expected to significantly increase this number of trips; hence, 75 daily truck trips were taken as the assumption in Alternative C of the Draft EIR.

COMMENT NO. E68-3

Regional Air Quality

The air quality in Southern California does not meet the state and federal standards. The American Lung Association consistently gives Los Angeles County failing grades in the amount of ozone and particulate pollution in the air. Although smog levels are impacted by seasons and weather patterns, smog is visible in the air on most days.

RESPONSE NO. E68-3

The City of Los Angeles has noted the comment about poor air quality in the region as defined by the American Lung Association. The American Lung Association gives an "F" rating for ozone, particulate pollution (24-hour), and particulate pollution (annual) for Los Angeles County. In regard to the California Ambient Air Quality Standards, Los Angeles County has also been designated nonattainment for ozone, PM_{10}, $PM_{2.5}$, nitrogen dioxide, and lead. The Draft EIR evaluates the proposed project with respect to the State CEQA Guidelines. Construction and operations emissions were modeled and compared to the South Coast Air Quality Management District (SCAQMD) Significance Thresholds. Only the PM_{10} construction emissions were found to exceed the SCAQMD significance threshold by 5.6 lbs/day. Mitigation measures are described in the Draft EIR on page IV.B-23 and IV.B-24, which reduce air quality impacts below the threshold of significance. All other criteria pollutants are expected to be below the SCAQMD significance

thresholds for both construction and operation phases. The proposed project is expected to be consistent with the regional 2012 Air Quality Management Plan. Please see pages IV.B-16, IV.B-17, and IV.B-19 of the Draft EIR for further information regarding the proposed project's consistency with state and regional air quality plans.

LETTER NO. E69

Jonathan Sosa

COMMENT NO. E69-1

I live on Central Avenue of Los Angeles. I have lived in Los Angeles all my life. I've been working at Poetry since April 2008. I am currently in the sales department. I do multiple things for my job: sales, shipping company POs, invoices, and also packing merchandise. With this job, I have been able to support my family. It has helped me become a better member of my family.

Working at Poetry has been a great experience. Poetry's working environment is professional and very great. I look forward to working with my co-workers every day. We get through the good times and bad times together, while always looking to help each other towards success. The product that our company sells brings happiness to many people around the world. By providing great merchandise, we give people opportunities for their business while providing people what they want. We help support, by giving jobs, not only here in Los Angeles, but also in China. I am happy to say Poetry is a great company.

RESPONSE NO. E69-1

Your comment on the proposed project has been noted. Your concerns will be taken into consideration by the decision makers prior to taking action on the proposed project.

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LETTER NO. E70

Laura Soto

COMMENT NO. E70-1

Hello, my name is Laura Soto. I have lived in the Los Angeles area for nearly 13 years. I have worked almost 5 years at IMPACT, Inc. and I have enjoyed my time here. The boss is good to his employees. He is attentive and tries to be fair. He promotes hard work but also enjoys camaraderie with the employees. For this and many other reasons, I am grateful and hope this company continues to grow.

RESPONSE NO. E70-1

Your comment on the proposed Project has been noted. Your concerns will be taken into consideration by the decision makers prior to taking action on the proposed project.

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LETTER NO. E71

Lisa Taylor

COMMENT NO. E71-1

Please do not accept the Draft EIR in its current form. It goes against the Open Space element in the City's master plan by opting against preservation and restoration of green open space in favor of more industrial uses.

RESPONSE NO. E71-1

Your comment regarding the consistency of the project with the City's General Plan Open Space Element has been noted. Section 15126.6 of the CEQA Guidelines requires an EIR to describe a range of reasonable alternatives to a project or to the location of a project that would feasibly attain most of the basic objectives of a project but would avoid or substantially lessen any of the significant effects of a project, and evaluate the comparative merits of the alternatives. The discussion of alternatives, however, need not be exhaustive, but rather the discussion must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. An EIR is not required to consider alternatives that are deemed "infeasible". In developing alternatives, the following factors are considered: (i) ability to meet most of the basic project objectives, (ii) feasibility, or (iii) ability to avoid significant environmental impacts.

As set forth in Section VI of the Draft EIR on pages VI-3 to VI-4, the Community Garden alternative, requested through public comments, considered development of the project for an alternate land use, specifically a community garden. However, this alternative was withdrawn from consideration as it does not meet the basic project objectives:

- A community garden or park would not attain the objective of providing a minimum of 480,000 square feet of light industrial space, consistent with the existing land use designation and zoning.
- A community garden or park would not provide light manufacturing jobs within 3 miles of an existing garment manufacturing labor force in the Southeast Los Angeles Community Plan Area.
- A community garden or park would not allow for development of an industrial park that is along the Alameda Corridor to take advantage of distribution efficiency opportunities.
- A community garden or park would not facilitate the ability of existing garment labor force, located in close proximity to the project site to utilize existing public transit system and other multi-modal transportation opportunities in vicinity of proposed project.
- A community garden or park would not preserve and/or redevelop the industrial sector of the Southeast Los Angeles Community Plan Area to accommodate emerging technologies, thus providing an enhanced employment base for the Community Plan Area's population.
- A community garden or park would not benefit the Southeast Los Angeles Community Plan area population as economic stimulation through employment opportunities,

attracting commercial and industrial tenants to the area, and providing tax revenue for the City would not occur.

The proposed use of the property as light manufacturing is consistent with land use planning objectives articulated in the Southeast Los Angeles Community Plan. The City of Los Angeles Southeast Los Angeles Community Plan has designated the project site as light industrial. The land use designation discourages nonindustrial uses and uses that compromise job-producing potential. Plan Goal 3 supports sufficient land for a variety of industrial uses with maximum employment opportunities, which are safe for the environment and the work force, and which have minimal adverse impacts on adjacent uses. The South East Los Angeles Community Plan further supports the retention and redevelopment of the industrial sector through Objective 3-1, Policy 3-1.1, and Objective 3-2, Policy 3-2.1:

Objective 3-1 To provide for existing and future industrial uses which contribute job opportunities for residents and which minimize environmental and visual impacts to the community.

Policies 3-1.1 Designate lands for the continuation of existing industry and development of new industrial parks, research and development uses, light manufacturing, and similar uses which provide employment opportunities.

Objective 3-2 To retain industrial plan designations to maintain the industrial employment base for community residents and to increase it whenever possible.

Policies 3-2.1 The significant, large industrially planned parcels located in predominantly industrial areas associated with the railroad transportation facilities along Alameda and in the Slauson area should be protected from development by other uses which do not support the industrial base of the community, and the City.

The Southeast Los Angeles Community Plan's open space goals and objectives support the preservation of existing open space and the development of new open space, in balance with new development, to serve the recreational, environmental, health and safety needs of the community. The objectives further note that the "Plan Map designates lands for open spaces including parklands." As noted above, the project site is in an industrial corridor adjacent to the Alameda Corridor rail line, and it is not designated for open space on the plan map. The area surrounding the proposed project site is developed almost exclusively with light and heavy industrial uses, with limited small lot single family residential homes intermixed with light/industrial warehouse uses to the south and residential areas farther to the west. The Alameda Corridor rail line is located directly to the east and runs below grade in the project area, and also includes the Southern Pacific Railroad right-of-way across South Alameda Street. The Metro Blue Line light rail is located immediately to the west of the project site. The nearest designated open space is the Ross Snyder Recreation Center, located 0.2 mile west of the proposed project site.

The applicant acknowledges the former interim use of the project site as a community garden that occurred under previous ownership. However, the use was discontinued in 2006, and the project site is currently vacant underutilized land in an industrially zoned area. Appendix XII and Section III.E of the Draft EIR provide details of a 2003 settlement agreement between the prior owner and the City of Los Angeles to dedicate 2.6 acres of the property for maintenance of a park for recreation and park purposes, and subsequent amendment of the agreement to allow the proposed project to be developed. This amendment for the cash pledge provided the City or a nonprofit organization with the funds to dedicate a park in a more appropriate location than the project site, which is industrially zoned and isolated to the west and east by major rail lines. The City Council accordingly determined that establishment of an active use park on the property is inappropriate due to the property's location in an industrial corridor, and

authorized execution of a Cash Pledge Agreement whereby a payment in the amount of $3,573,365 was made to improve and provide recreational and park facilities at more suitable alternate sites in the vicinity of the property (see Report of the Chief Legislative Analyst, Ordinance No. 181949, and City Council Motion included in Appendix XII of the Draft EIR). The value of the cash pledge was determined on the basis of the pro rata value of the 2.6 acres to be set aside for recreational purposes pursuant to the settlement agreement relative to the overall purchase price of the project site. For further information on the site background and cash pledge agreement for park and recreational uses, please see pages IV-3 and IV-4 of the Corrections and Additions section of this Final EIR, and pages III-6 and III-7 and Appendix XII of the Draft EIR.

As stated in the Draft EIR and summarized above, the project's cash pledge agreement will contribute to open space in the City in a more suitable location, while the project site would be developed consistent with its Community Plan designation, goals and policies, and the project objectives. As a result, the project is consistent with the Open Space Element. The Open Space Element consists primarily of general aspirational citywide policies and programs encouraging the provision of open space. The commenter has not specified in what way the project would be inconsistent with this General Plan Element. However, the project would be consistent with the South East Los Angeles Community Plan goals, objectives and land use designation as specified above in this Response to Comment No. E71-1, and further would contribute to open space amenities nearby, and, as such is considered substantially consistent with the general intent of the Open Space Element.

COMMENT NO. E71-2

The best use would be to return it to the community as an urban garden with recreational opportunities. Additionally, more diesel truck trips required for the warehouse activity will only add to the area's already unacceptable level of air and noise pollution and decrease pedestrian and automobile safety by increasing traffic congestion adjacent to a residential area and the Metro Blue Line.

RESPONSE NO. E71-2

Your comment regarding the best use of the property, cumulative air quality impacts, and traffic and pedestrian safety has been noted.

Section 15126.6 of the CEQA Guidelines requires an EIR to describe a range of reasonable alternatives to a project or to the location of a project that would feasibly attain most of the basic objectives of a project but would avoid or substantially lessen any of the significant effects of a project, and evaluate the comparative merits of the alternatives. The discussion of alternatives, however, need not be exhaustive, but rather the discussion must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. An EIR is not required to consider alternatives that are deemed "infeasible". In developing alternatives, the following factors are considered: (i) ability to meet most of the basic project objectives, (ii) feasibility, or (iii) ability to avoid or substantially lessen significant environmental impacts.

As set forth in Section VI of the Draft EIR on pages VI-3 to VI-4, the Community Garden alternative, requested through public comments, considered development of the project for an alternate land use, specifically a community garden. However, this alternative was withdrawn from further analysis, because it is does not meet basic project objectives. The City of Los Angeles Southeast Los Angeles Community Plan has designated the project site as light industrial. The land use designation discourages nonindustrial uses and uses that compromise job-producing potential. At full build out, the proposed project would consist of approximately 480,120 square feet encompassing 12.9 acres. The South East Los Angeles

Community Plan supports the redevelopment of the industrial sector through Objective 3-1, Policy 3-1.1, and Objective 3-2, Policy 3-2.1:

> **Objective 3-1** To provide for existing and future industrial uses which contribute job opportunities for residents and which minimize environmental and visual impacts to the community.
>
> **Policies 3-1.1** Designate lands for the continuation of existing industry and development of new industrial parks, research and development uses, light manufacturing, and similar uses which provide employment opportunities.
>
> **Objective 3-2** To retain industrial plan designations to maintain the industrial employment base for community residents and to increase it whenever possible.
>
> **Policies 3-2.1** The significant, large industrially planned parcels located in predominantly industrial areas associated with the railroad transportation facilities along Alameda and in the Slauson area should be protected from development by other uses which do not support the industrial base of the community, and the City.

Development of the property as a community garden also does not meet the basic objectives of the project:

- A community garden would not attain the objective of providing a minimum of 480,000 square feet of light industrial space, consistent with the existing land use designation and zoning.
- A community garden would not provide light manufacturing jobs within 3 miles of an existing garment manufacturing labor force in the Southeast Los Angeles Community Plan Area.
- A community garden would not allow for development of an industrial park that is along the Alameda Corridor to take advantage of distribution efficiency opportunities.
- A community garden would not facilitate the ability of existing garment labor force, located in close proximity to the project site to utilize existing public transit system and other multi-modal transportation opportunities in vicinity of proposed project.
- A community garden would not preserve and/or redevelop the industrial sector of the Southeast Los Angeles Community Plan Area to accommodate emerging technologies, thus providing an enhanced employment base for the Community Plan Area's population.
- A community garden would not benefit the Southeast Los Angeles Community Plan area population as economic stimulation through employment opportunities, attracting commercial and industrial tenants to the area, and providing tax revenue for the City would not occur.

Appendix XII and Section III.E of the Draft EIR provide details of a 2003 settlement agreement between the prior owner and the City of Los Angeles to dedicate 2.6 acres of the property for maintenance of a park for recreation and park purposes, and subsequent amendment of the agreement to allow the proposed project to be developed. This amendment of the cash pledge provided the City or a nonprofit organization

with the funds to dedicate a park in an alternative site more suitable for the community's agricultural use and park/recreational development functions. In order to satisfy the City's requirement for recreational use for the community, the City adopted Ordinance No. 181949 on November 23, 2011,[65] whereby funds were contributed to park/recreational development at more suitable alternative sites. For further information on the site background and cash pledge agreement for park and recreational uses, please see pages IV-3 and IV-4 of the Corrections and Additions section of this Final EIR, and pages III-6 and III-7 of the Draft EIR.

As stated in the Draft EIR and summarized above, the project's cash pledge agreement will contribute to open space in the City in a more suitable location, while the project site would be developed consistent with its community plan designation, goals and policies, and the project objectives. As a result, the project is consistent with the Open Space Element.

There are 11 projects expected to be implemented within a 2-mile radius of the proposed project during the construction period of the proposed project. Cumulative impacts to air quality are expected to be below the level of significance with the implementation of the Mitigation Measures Air-1 to Air-7 which are listed on pages IV.B-23 and IV.B-24 in the Draft EIR and listed here:

Air-1
During the construction phase of the project, the project applicant shall apply soil stabilizers for all unpaved roads (80 percent reduction in PM2.5 and PM10 emissions).

Air-2
During the construction phase of the project, the project applicant shall water exposed areas three times a day (61 percent reduction in PM2.5 and PM10 emissions).

Air-3
During the construction phase of the project, the project applicant shall ensure that vehicular speeds are reduced to 15 miles per hour on unpaved roads.

Air-4
The project applicant shall establish incentives for increased transit frequency- in compliance with the transportation demand management and trip reduction measures set forth in Section 12.26J of the Los Angeles Municipal Code, which include the following requirements for non-residential projects with more than 100,000 square feet of floor area.

(a) Development in excess of 25,000 square feet of gross floor area. The owner shall provide a bulletin board, display case, or kiosk (displaying transportation information) where the greatest number of employees are likely to see it. The transportation information displayed should include, but is not limited to, the following:

(1) Current routes and schedules for public transit serving the site;

(2) Telephone numbers for referrals on transportation information including numbers for the regional ridesharing agency and local transit operations;

(3) Ridesharing promotion material supplied by commuter-oriented organizations;

[65] Ordinance No. 181949, Report of the Chief Legislative Analyst for Council File No. 11-1524, and Motion, dated February 24, 2012.

(4) Regional/local bicycle route and facility information;

(5) A listing of on-site services or facilities which are available for carpoolers, vanpoolers, bicyclists, and transit riders.

(b) Development in excess of 50,000 square feet of gross floor area. The owner shall comply with Paragraph (a) above and in addition shall provide:

(1) A designated parking area for employee carpools and vanpools as close as practical to the main pedestrian entrance(s) of the building(s). This area shall include at least ten percent of the parking spaces required for the site. The spaces shall be signed and striped sufficient to meet the employee demand for such spaces. The carpool/vanpool parking area shall be identified on the driveway and circulation plan upon application for a building permit;

(2) One permanent, clearly identified (signed and striped) carpool/vanpool parking space for the first 50,000 to 100,000 square feet of gross floor area and one additional permanent, clearly identified (signed and striped) carpool/vanpool parking space for any development over 100,000 square feet of gross floor area;

(3) Parking spaces clearly identified (signed and striped) shall be provided in the designated carpool/vanpool parking area at any time during the building's occupancy sufficient to meet employee demand for such spaces. Absent such demand, parking spaces within the designated carpool/vanpool parking area may be used by other vehicles;

(4) No signed and striped parking spaces for carpool/vanpool parking shall displace any handicapped parking;

(5) A statement that preferential carpool/vanpool spaces are available on-site and a description of the method for obtaining permission to use such spaces shall be included on the required transportation information board;

(6) A minimum vertical clearance of 7 feet 2 inches shall be provided for all parking spaces and accessways used by vanpool vehicles when located within a parking structure;

(7) Bicycle parking shall be provided in conformance with Section 12.21A16 of this Code.

(c) Development in excess of 100,000 square feet of gross floor area. The owner shall comply with Paragraphs (a) and (b) above and shall provide:

(1) A safe and convenient area in which carpool/vanpool vehicles may load and unload passengers other than in their assigned parking area;

(2) Sidewalks or other designated pathways following direct and safe routes from the external pedestrian circulation system to each building in the development;

(3) If determined necessary by the City to mitigate the project impact, bus stop improvements shall be provided. The City will consult with the local bus service providers in determining appropriate improvements. When locating bus stops and/or planning building entrances, entrances shall be designed to provide safe and efficient access to nearby transit stations/stops;

(4) Safe and convenient access from the external circulation system to bicycle parking facilities on-site.

Air-5
The project applicant shall improve the pedestrian network for the project site to internally link all uses and connect with existing or planned external streets and pedestrian facilities contiguous with the project site. The project applicant shall identify street trees and streetscape improvements to connect site access points to nearby transit and bicycle facilities.

Air-6
The project applicant shall provide traffic calming measures through street improvements. The applicant will be dedicating additional right-of-way along 41st Street, Alameda Street, and Martin Luther King, Jr. Boulevard. In connection with the street dedications and development of the proposed project, the applicant will be upgrading existing sidewalks, curb and gutter, as well as street trees, street lighting, and street furniture around the entire perimeter of the property in consultation with the City Department of Transportation and Department of Public Works. Upgrades to the existing sidewalks will require new curb cuts and crosswalks and the replacement of existing traffic signals at intersections. Additional traffic control devices will be installed as necessary and required to facilitate safe traffic circulation in and around the proposed project site.

Air-7
The project applicant shall ensure low VOC paint is applied for interior and exterior uses [250 EF (g/L)].

Construction emissions are shown in Table IV.B-8, Unmitigated Estimated Daily Regional Construction Emissions, and are only significant for PM_{10}. Operational emissions are shown in Table IV.B-9, Unmitigated Estimated Daily Operational Emissions, and are not significant for any of the criteria air pollutants. The PM_{10} emissions from construction will be mitigated to below the level of significance with the implementation of the seven mitigation measures.

The primary sources of TAC emissions associated with the proposed project's operations would be limited to DPM from delivery trucks. The results of the TAC analysis are shown in Table IV.B-11, Summary of DPM Health Impact Results. As described in Section IV.B (pages IV.B-22) of the Draft EIR, the resulting maximum potential cancer risk is 0.3 in a million, which is only 3 percent of the cancer risk threshold of 10 in a million as set by SCAQMD Rule 1401.

Diesel emissions are particularly examined in the Health Risk Assessment (HRA) found in Appendix V in Volume IV of the Draft EIR. The Draft EIR concluded that noise from the proposed project would have a less than significant impact. Please refer to the Initial Study in Appendix III of this Draft EIR, and to Appendix IS-1, Noise Technical Report, for further information.Thank you for your comment regarding cumulative air quality impacts. There are 11 projects expected to be implemented within a 2-mile radius of the proposed project during the construction period of the proposed project. Cumulative impacts to air quality are expected to be below the level of significance with the implementation of Mitigation Measures Air-1 to Air-7 in the Draft EIR.

Your comment addressing traffic congestion and safety has been noted. From the Traffic Impact Study, the study intersections for 2016, except Alameda St. and Washington Blvd during the PM peak hour, show no significant impacts due to traffic from the proposed project. All study intersections would operate at an acceptable level of service (LOS) (at LOS A through D). A project's traffic impact is determined to be significant if the increase in Volume to Capacity (V/C) is 0.04 or more at LOS C, or 0.02 or more at LOS D, or 0.01 or more at LOS E and F. With the implementation of the five Mitigation

Measures listed in the Draft EIR, Traffic-1 to Traffic-5, the total traffic impact would not be considered significant. If 75 truck trips are assumed, as dictated by the project applicant, no off-site mitigation measures are necessary.

According to the Addendum to the Traffic Impact Study in October 2014, "The analysis also indicates that the project trips will not exceed the thresholds of requirements for Metro's Congestion Management Program (CMP) analysis. Similarly, the thresholds of requirements for Caltrans District 7's freeway segment and off-ramp analysis will not be exceeded. Therefore, the project will not have a significant impact on the CMP network and freeway segments or off-ramps. The two at-grade rail crossings near the project sites will be used by the project traffic; however, these rail crossing are currently adequately equipped with warning and safety devices."

Significant impacts occur at the intersection Alameda Street and East Washington Boulevard using 351 truck trips per day based on ITE trip generation rates. Section VI *Alternatives* in the Draft EIR examines the following alternatives: Alternative A, No Project Alternative; Alternative B, Use of Clean Fuel Trucks; and Alternative C, Reduced Truck Operations. These alternatives provide ways to reduce the environmental impact of the proposed project. Under Alternative C, the project would not generate traffic at the ITE-recommended rate (i.e., 351 truck trips per day) which is based on surveys conducted nationally at typical warehouse facilities. The project applicant has indicated that truck trips associated with operation of the proposed project would not exceed 75 daily truck trips, which has therefore been analyzed as Alternative C of the Draft EIR. However, siginificant impacts will still remain at the intersection of Alameda Street and East Washington Boulevard using full ITE trip rates. This assumption stems from the existing operations at the various facilities that would be consolidated in the proposed project. An analysis with this reduced number of truck trips shows that Alternative C will not have a significant impact at any of the study intersections. Currently, there is a maximum of 33 trips/day total for the various existing facilities. The proposed project build out is not expected to significantly increase this number of trips; hence the 75 daily truck trips was taken as the conservative and economically viable assumption in Alternative C of the Draft EIR.

Regarding rail crossing and freeway safety, according to the Addendum to the Traffic Impact Study in October 2014 (Appendix IX in Volume VI of the Draft EIR, page 9).

> *The analysis also indicates that the project trips will not exceed the thresholds of requirements for Metro's Congestion Management Program (CMP) analysis. Similarly, the thresholds of requirements for Caltrans District 7's freeway segment and off-ramp analysis will not be exceeded. Therefore, the project will not have a significant impact on the CMP network and freeway segments or off-ramps. The two at-grade rail crossings near the project sites will be used by the project traffic; however, these rail crossing are currently adequately equipped with warning and safety devices.*
>
> *The proposed project's traffic distribution shows that a maximum of 28 vehicles will use the 41st Street at-grade crossing to travel outbound to the west during the PM peak hour, while a maximum of 7 vehicles will use 38th Place at-grade crossing to travel inbound from the east during the AM and PM peak hours. These crossings are currently used by existing traffic, and are adequately equipped with various warning and safety devices to alert and prevent traffic crossing during train movements across 41st Street and 38th Place, and allow safe crossings of traffic when there are no train movements. Therefore, no additional safety measures are deemed necessary at these at-grade rail crossings to accommodate traffic from the proposed project.*

COMMENT NO. E71-3

The DEIR fails to recognize the community value in using the land for recreational purposes. Please re-do this DEIR to take into consideration community values in using this land for gardening and recreation.

RESPONSE NO. E71-3

Your comment on using the project site for recreational uses has been noted. The alternatives analysis determined that the community garden and recreation alternatives were infeasible as they did not meet basic objectives of the project.

Section 15126.6 of the CEQA Guidelines requires an EIR to describe a range of reasonable alternatives to a project or to the location of a project that would feasibly attain most of the basic objectives of a project but would avoid or substantially lessen any of the significant effects of a project, and evaluate the comparative merits of the alternatives. The discussion of alternatives, however, need not be exhaustive, but rather the discussion must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. An EIR is not required to consider alternatives that are deemed "infeasible". In developing alternatives, the following factors are considered: (i) ability to meet most of the basic project objectives, (ii) feasibility, or (iii) ability to avoid significant environmental impacts.

The Park or Recreational Use alternative, requested through public comments, considered development of the project for an alternate land use, specifically a park. However, this alternative was withdrawn from further analysis, because it does not meet the basic objectives of the project:

- A park would not attain the objective of providing a minimum of 480,000 square feet of light industrial space, consistent with the existing land use designation and zoning.
- A park would not provide light manufacturing jobs within 3 miles of an existing garment manufacturing labor force in the Southeast Los Angeles Community Plan Area.
- A park would not allow for development of an industrial park that is along the Alameda Corridor to take advantage of distribution efficiency opportunities.
- A park would not facilitate the ability of existing garment labor force, located in close proximity to the project site to utilize existing public transit system and other multi-modal transportation opportunities in vicinity of proposed project.
- A park would not preserve and/or redevelop the industrial sector of the Southeast Los Angeles Community Plan Area to accommodate emerging technologies, thus providing an enhanced employment base for the Community Plan Area's population.
- A park would not benefit the Southeast Los Angeles Community Plan area population as economic stimulation through employment opportunities, attracting commercial and industrial tenants to the area, and providing tax revenue for the City would not occur.

Appendix XII and Section III.E of the Draft EIR provide details of a 2003 settlement agreement between the prior owner and the City of Los Angeles to dedicate 2.6 acres of the property for maintenance of a park for recreation and park purposes, and subsequent amendment of the agreement to allow the proposed project to be developed. This amendment for the cash pledge provided the City or a nonprofit

organization with the funds to dedicate a park in an alternative site more suitable for the community's agricultural use and park/recreational development functions. In order to satisfy the City's requirement for recreational use for the community, the City adopted Ordinance No. 181949 on November 23, 2011,[66] whereby funds were contributed to park/recreational development at more suitable alternative sites.

As stated in the Draft EIR and summarized above in Response to Comment Nos. E71-1 through E71-3, the project's cash pledge agreement will contribute to open space in the City in a more suitable location, while the project site would be developed consistent with its community plan designation, goals and policies, and the project objectives.

[66] Ordinance No. 181949, Report of the Chief Legislative Analyst for Council File No. 11-1524, and Motion, dated February 24, 2012.

LETTER NO. E72

Mr. Tezozomoc Letter No. 1

COMMENT NO. E72-1

South LA Sweatshops will have long term detrimental health impact to the residents of South Central Los Angeles

The City Planning Department has announced its intention to allow 4 warehouses to be built with a substandard Draft Environmental Impact Report (Case Number: ENV-2012-920-EIR, AA-2012-919-PMLA, DIR-2013-887-SPR), a move Farm representatives and the community say will have long term detrimental health impacts for local South LA residents. Plans call for 4 warehouse facilities that will draw some 75 diesel big rigs into the area every day, creating an intolerable concentration of diesel fumes and particulate matter in a neighborhood in a warehousing district already saturated with such exhaust, posing the danger of increased risks of cancer, emphysema, asthma, and increased hospitalizations to poor people of color who live in the district. South Central Farm representative Tezozomoc said, "This is an unmistakable and undeniable threat to the health and well being of the people who live here, and that the City Planning Department has accepted a substandard Draft Environmental Impact Report on behalf of PIMA is a clear cut example of environmental racism." I call on the city, " to unconditionally reject the DEIR and return the land to the community to anchor an environmental justice project to begin to clean up the community".

RESPONSE NO. E72-1

Your comment in regard to the health risks from the diesel truck trips generated by the proposed project has been noted. The construction phase air quality impact analysis can be found in the Impact Analysis portion of Section IV.B *Air Quality* of the Draft EIR. Construction related toxic air contaminants (TACs) from diesel particulate emissions will be short-lived (3 months), and therefore do not require a Health Risk Assessment (HRA) from the Office of Environmental Health Hazard Assessment (OEHHA). Diesel particulate emissions only affect the population on a long-term (70-year) basis for cancer impacts, so the impact of short-term TACs from the construction of the proposed project is considered less than significant, as analyzed in Section IV.B (pages IV.B-15 through -18) of the Draft EIR. Construction emissions were analyzed for the six main criteria air pollutants as evident in Table IV.B-8. Emissions from VOCs, NOx, CO, SOx, and $PM_{2.5}$ were calculated to be below the SCAQMD significance threshold. PM_{10}, does have a significant impact during the construction phase, but it can be reduced to below the level of significance with mitigation measures.

For the operations of the proposed project, Section IV.G, *Transportation/Traffic* of the Draft EIR considered 351 truck trips/day based on Institute of Transportation Engineers guidelines. Of the 351, EMFAC 2011, an emissions factor model, estimates that on average 9 percent of the total trucks are diesel fueled trucks for an estimate of 31 diesel fueled trucks, as mentioned in the Human Health Risk Analysis portion of Section IV.B *Air Quality* of the Draft EIR. Because the total daily truck trips are greater than 100, a refined Health Risk Assessment for operational impacts was conducted that identified sensitive receptors and individual cancer risk. Diesel particulate is the majority of health risk among the TACs emitted from both diesel- and gasoline-fueled vehicles, so only diesel particulate emissions are considered for the Health Risk Assessment. As described in Section IV.B (page IV.B-22) of the Draft EIR, the resulting maximum potential cancer risk is 0.3 in a million, which is only 3 percent of the cancer risk threshold of 10 in a million as set by the South Coast Air Quality Management District Rule 1401. In addition to the cancer risk, operational emissions associated with the proposed project for the six main criteria air pollutants are quantified in Table IV.B-9, Unmitigated Estimated Daily Operational Emissions,

of the Draft EIR, and were found to be below thresholds of significance established by SCAQMD. Therefore, the proposed project would not result in significant human health risks related to diesel emissions. Further details on the air quality impacts analysis in the operational phase can be found in pages IV.B18 –B22 of the Draft EIR.

With Alternative C, Reduced Truck Operations, truck trips would be limited to 75 truck trips per day. As a result, the maximum cancer risk drops to 0.6 percent of the allowable threshold. The alternatives with clean fuel trucks and reduced truck operations would result in fewer diesel emissions.

CEQA centers on whether a project may have a significant effect on the physical environment (CEQA Guidelines, 15064(d)). The purpose of an environmental impact report is to identify the significant effects on the environment of a project, to identify alternatives to the project, and to indicate the manner in which those significant effects can be mitigated or avoided (Pub. Res. Code, §21002.1 subd. (a)). Environmental justice is not considered an area of impact under CEQA, and CEQA does not ask that a project mitigate preexisting conditions. As noted in CEQA Guidelines Section 15064(b), the significance of an activity may vary with the environmental setting. Where there already is a high pollution burden on a community, the relevant question is whether an additional amount of pollution should be considered significant in light of the serious nature of the existing problem.[67]

The Existing Conditions section in Section IV.B *Air Quality* of the Draft EIR includes ambient air quality data gathered from the local air quality monitoring stations. The average concentrations and days above the standard for each criteria air pollutant are listed in Table IV.B-6 *Summary of 2010-2012 Ambient Air Quality Data in the Proposed Project Vicinity* on page IV.B-11 of the Draft EIR. The Air Quality impact analysis relative to the impacts of the proposed project has been further detailed above in this Response to Comment No. E72-1, and is located in Section IV.B *Air Quality* of the Draft EIR. In the Draft EIR, sensitive receptors are defined on page IV.B-11. There are two maps showing their locations: Figure IV.B-1 *Sensitive Receptors* and Figure IV. B-2 *Receptor Grid and Sensitive Receptors*.

COMMENT NO. E72-2

It is clear that Los Angeles City has failed the residents of South LA by considering a substandard DEIR. In 2008 the City of Los Angeles reviewed a project submitted by Horowitz to do one warehouse that encompassed 437,196 sq. ft. (see Case No. ENV-2008-799-MND, VTT-61482, DIR-2008-841-SPR, aka 41st and Alameda Warehouse Project) and at that time there would be 264 truck trips per day. In the recent DEIR PIMA will be developing 481,022 sq. ft. of warehouse space; comprised of 4 buildings and over 2000 car trips per day. In PIMA's proposal they claim a mere 75 trip trucks a day. There is a difference of 189 truck trips per days for a warehouse space that is 10% larger. There is a difference of 70% in truck trips. What is problematic with this assumption is that all further analysis will be based on the underspecified 75 truck trips per day. While this under estimation of the truck trips may get the project approved by the City; the city under Jan Perry has supported this project, it will have long negative impact on the residents of South Los Angeles. In the realm of Air Quality Health Risk Assessment the truck trips are further down estimated to 31 diesel fueled trucks per day. The Kleinfelder's Health Risk Analysis is faulty because it also assumes a degraded amount of truck trips per day; 75 truck trips per day.

[67] Harris, Kamala D. 10 July 2012. *Environmental Justice at the Local and Regional Level: Legal Background*. Prepared by State of California Department of Justice. Available at: http://oag.ca.gov/sites/all/files/agweb/pdfs/environment/ej_fact_sheet.pdf

RESPONSE NO. E72-2

The City of Los Angeles has noted the concern about the discrepancy in the number of truck trips and the resulting health risks. A total of 351 truck trips is assumed in the Air Quality Health Risk Assessment (Appendix V in Volume IV of the Draft EIR) and Section IV.B, *Air Quality*, of the Draft EIR based on the Addendum to the Traffic Impact Study (Appendix IX in Volume VI of the Draft EIR). Of the 351 truck trips, EMFAC 2011 estimates that on average 9 percent of the total trucks are diesel fueled trucks for an estimate of 31 diesel-fueled trucks as mentioned in the Human Health Risk Analysis portion of Section IV.B *Air Quality* of the Draft EIR.

The Draft EIR states on page IV.G-13 that

> *It is calculated that the proposed project will generate approximately 1,966 net passenger car equivalent (PCE) trips per average day. The average weekday net new peak hour PCE trips will be approximately 179 trips during the a.m. peak hour and 190 trips during the p.m. peak hours (Figure IV.G-6, Distribution of Project Traffic, and Figure IV.G-7, Existing [2014] plus Project Traffic Volumes). The traffic analysis also considered the distribution of trips during a.m. and p.m. peak hours in the vicinity of the proposed project (Figure IV.G- 8, Project Traffic at Driveways and Adjacent Intersections).*
>
> *While these estimates were developed based on the ITE's Trip Generation Manual, the project applicant has indicated that truck trips associated with operation of the proposed project would not exceed 75 daily truck trips, which has therefore been analyzed as Alternative C in this Draft EIR (see Attachment E to the Initial Study, which is Appendix III of this Draft EIR).*

The 75 truck trips identified in Alternative C stem from the existing operations at various facilities, which will be consolidated in the proposed project. Currently, there is a maximum of 33 truck trips/day total for the various facilities. The proposed project build out is not expected to significantly increase this number of trips; hence, 75 daily truck trips were taken as the assumption in Alternative C of the Draft EIR.

COMMENT NO. E72-3

Regional Air Quality

The air quality in Southern California does not meet the state and federal standards. The American Lung Association consistently gives Los Angeles County failing grades in the amount of ozone and particulate pollution in the air. Although smog levels are impacted by seasons and weather patterns, smog is visible in the air on most days.

RESPONSE NO. E72-3

The City of Los Angeles has noted the comment about poor air quality in the region as defined by the American Lung Association. The American Lung Association gives an "F" rating for ozone, particulate pollution (24-hour), and particulate pollution (annual) for Los Angeles County. In regard to the California Ambient Air Quality Standards, Los Angeles County has also been designated nonattainment for ozone, PM_{10}, $PM_{2.5}$, nitrogen dioxide, and lead. The Draft EIR evaluates the proposed project with respect to the State CEQA Guidelines. Construction and operations emissions were modeled and compared to the South Coast Air Quality Management District (SCAQMD) Significance Thresholds. Only the PM_{10} construction emissions were found to exceed the SCAQMD significance threshold by 5.6 lbs/day. Mitigation measures are described in the Draft EIR on page IV.B-23 and IV.B-24, which reduce air quality impacts below the threshold of significance. All other criteria pollutants are expected to be below the SCAQMD significance

thresholds for both construction and operation phases. The proposed project is expected to be consistent with the regional 2012 Air Quality Management Plan. Please see pages IV.B-16, IV.B-17, and IV.B-19 of the Draft EIR for further information regarding the proposed project's consistency with state and regional air quality plans.

LETTER NO. E73

Mr. Tezozomoc Letter No. 2

COMMENT NO. E73-1

When is there supposed to be a vote on this item...

RESPONSE NO. E73-1

Your name and contact information has been included in the project distribution list. As a result, you will be informed of future hearing dates and opportunities to comment and provide input on the project.

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LETTER NO. E74

Mr. Tezozomoc Letter No. 3

COMMENT NO. E74-1

please find the attached spreadsheet that has been collected with people opposition to the DEIR for the 4051 Alameda Project..

RESPONSE NO. E74-1

The City acknowledges your email of an MS Excel spreadsheet consisting of 87 names and email addresses that were sent to you in opposition of the project. Your concerns and the concerns of the 87 people that sent their names and email addresses will be taken into consideration by the decision makers prior to taking action on the proposed project.

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LETTER NO. E75

Sonia Torres

COMMENT NO. E75-1

My name is Sonia Torres and I have lived on 24th Stand Central Ave for more than 20 years. For the last 10 years, I have been working for the company Impact in which Tony is the owner. I am happy to be working for this company because I like what I do and Tony has been a great boss. He has always paid on time and fairly. I have been fortunate enough to have friendly coworkers as well. Being happy at work has made me happy at home.

RESPONSE NO. E75-1

Your comment on the proposed project has been noted. Your concerns will be taken into consideration by the decision makers prior to taking action on the proposed project.

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LETTER NO. E76

Jose Urias

COMMENT NO. E76-1

I live on Figueroa Street of Los Angeles. I have lived in Los Angeles since 1998. I've been working at Poetry since July 2011. I am currently in the sales department. I do multiple things for my job: sales, shipping company POs, and also packing merchandise. With this job, I have been able to support my family. It has helped me become a better member of my family.

Working at Poetry has been a great experience. Poetry's working environment is professional and very great. I look forward to working with my co-workers every day. We get through the good times and bad times together, while always looking to help each other, towards success. The product that our company sells brings happiness to many people around the world. By providing great merchandise, we give people opportunities for their business while providing people what they want. We help support, by giving jobs, not only here in Los Angeles, but also in China. I am happy to say Poetry is a great company.

RESPONSE NO. E76-1

Your comment on the proposed project has been noted. Your concerns will be taken into consideration by the decision makers prior to taking action on the proposed project.

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LETTER NO. E77

Enrique Vasquez

COMMENT NO. E77-1

I live on Figueroa Street of Los Angeles. I have lived in Los Angeles since 1998. I've been working at Poetry since September 2006. I am currently in the sales department. I do multiple things for my job: sales, shipping company POs, and also packing merchandise. With this job, I have been able to support my family. It has helped me become a better member of my family.

Working at Poetry has been a great experience. Poetry's working environment is professional and very great. I look forward to working with my co-workers every day. We get through the good times and bad times together, while always looking to help each other towards success. The product that our company sells brings happiness to many people around the world. By providing great merchandise, we give people opportunities for their business while providing people what they want. We help support, by giving jobs, not only here in Los Angeles, but also in China. I am happy to say Poetry is a great company.

RESPONSE NO. E77-1

Your comment on the proposed project has been noted. Your concerns will be taken into consideration by the decision makers prior to taking action on the proposed project.

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LETTER NO. E78

Teresa Ventura

COMMENT NO. E78-1

My name is Teresa Ventura. I have worked for this company since February 2004 and for years I worked trimming and inspecting. In 2013 my boss gave me the opportunity to do the office cleaning, work that I've performed with pleasure and improve upon each day. Thanks to this job, I have been able to support my two children, having worked 11 years at IMPACT.

RESPONSE NO. E78-1

Your comment on the proposed project has been noted. Your concerns will be taken into consideration by the decision makers prior to taking action on the proposed project.

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LETTER NO. E79

Ayanna Ware

COMMENT NO. E79-1

South LA Sweatshops will have long term detrimental health impact to the residents of South Central Los Angeles

The City Planning Department has announced its intention to allow 4 warehouses to be built with a substandard Draft Environmental Impact Report (Case Number: ENV-2012-920-EIR, AA-2012-919-PMLA, DIR-2013-887-SPR), a move Farm representatives and the community say will have long term detrimental health impacts for local South LA residents. Plans call for 4 warehouse facilities that will draw some 75 diesel big rigs into the area every day, creating an intolerable concentration of diesel fumes and particulate matter in a neighborhood in a warehousing district already saturated with such exhaust, posing the danger of increased risks of cancer, emphysema, asthma, and increased hospitalizations to poor people of color who live in the district. South Central Farm representative Tezozomoc said, "This is an unmistakable and undeniable threat to the health and well being of the people who live here, and that the City Planning Department has accepted a substandard Draft Environmental Impact Report on behalf of PIMA is a clear cut example of environmental racism." I call on the city, " to unconditionally reject the DEIR and return the land to the community to anchor an environmental justice project to begin to clean up the community".

RESPONSE NO. E79-1

Your comment in regard to the health risks from the diesel truck trips generated by the proposed project has been noted. The construction phase air quality impact analysis can be found in the Impact Analysis portion of Section IV.B *Air Quality* of the Draft EIR. Construction related toxic air contaminants (TACs) from diesel particulate emissions will be short-lived (3 months), and therefore do not require a Health Risk Assessment (HRA) from the Office of Environmental Health Hazard Assessment (OEHHA). Diesel particulate emissions only affect the population on a long-term (70-year) basis for cancer impacts, so the impact of short-term TACs from the construction of the proposed project is considered less than significant, as analyzed in Section IV.B (pages IV.B-15 through -18) of the Draft EIR. Construction emissions were analyzed for the six main criteria air pollutants as evident in Table IV.B-8. Emissions from VOCs, NOx, CO, SOx, and $PM_{2.5}$ were calculated to be below the SCAQMD significance threshold. PM_{10}, does have a significant impact during the construction phase, but it can be reduced to below the level of significance with mitigation measures.

For the operations of the proposed project, Section IV.G, *Transportation/Traffic* of the Draft EIR considered 351 truck trips/day based on Institute of Transportation Engineers guidelines. Of the 351, EMFAC 2011, an emissions factor model, estimates that on average 9 percent of the total trucks are diesel fueled trucks for an estimate of 31 diesel fueled trucks, as mentioned in the Human Health Risk Analysis portion of Section IV.B *Air Quality* of the Draft EIR. Because the total daily truck trips are greater than 100, a refined Health Risk Assessment for operational impacts was conducted that identified sensitive receptors and individual cancer risk. Diesel particulate is the majority of health risk among the TACs emitted from both diesel- and gasoline-fueled vehicles, so only diesel particulate emissions are considered for the Health Risk Assessment. As described in Section IV.B (page IV.B-22) of the Draft EIR, the resulting maximum potential cancer risk is 0.3 in a million, which is only 3 percent of the cancer risk threshold of 10 in a million as set by the South Coast Air Quality Management District Rule 1401. In addition to the cancer risk, operational emissions associated with the proposed project for the six main criteria air pollutants are quantified in Table IV.B-9, Unmitigated Estimated Daily Operational Emissions,

of the Draft EIR, and were found to be below thresholds of significance established by SCAQMD. Therefore, the proposed project would not result in significant human health risks related to diesel emissions. Further details on the air quality impacts analysis in the operational phase can be found in pages IV.B18 –B22 of the Draft EIR.

With Alternative C, Reduced Truck Operations, truck trips would be limited to 75 truck trips per day. As a result, the maximum cancer risk drops to 0.6 percent of the allowable threshold. The alternatives with clean fuel trucks and reduced truck operations would result in fewer diesel emissions.

CEQA centers on whether a project may have a significant effect on the physical environment (CEQA Guidelines, 15064(d)). The purpose of an environmental impact report is to identify the significant effects on the environment of a project, to identify alternatives to the project, and to indicate the manner in which those significant effects can be mitigated or avoided (Pub. Res. Code, §21002.1 subd. (a)). Environmental justice is not considered an area of impact under CEQA, and CEQA does not ask that a project mitigate preexisting conditions. As noted in CEQA Guidelines Section 15064(b), the significance of an activity may vary with the environmental setting. Where there already is a high pollution burden on a community, the relevant question is whether an additional amount of pollution should be considered significant in light of the serious nature of the existing problem.[68]

The Existing Conditions section in Section IV.B *Air Quality* of the Draft EIR includes ambient air quality data gathered from the local air quality monitoring stations. The average concentrations and days above the standard for each criteria air pollutant are listed in Table IV.B-6 *Summary of 2010-2012 Ambient Air Quality Data in the Proposed Project Vicinity* on page IV.B-11 of the Draft EIR. The Air Quality impact analysis relative to the impacts of the proposed project has been further detailed above in this Response to Comment No. E79-1, and is located in Section IV.B *Air Quality* of the Draft EIR. In the Draft EIR, sensitive receptors are defined on page IV.B-11. There are two maps showing their locations: Figure IV.B-1 *Sensitive Receptors* and Figure IV. B-2 *Receptor Grid and Sensitive Receptors*.

COMMENT NO. E79-2

It is clear that Los Angeles City has failed the residents of South LA by considering a substandard DEIR. In 2008 the City of Los Angeles reviewed a project submitted by Horowitz to do one warehouse that encompassed 437,196 sq. ft. (see Case No. ENV-2008-799-MND, VTT-61482, DIR-2008-841-SPR, aka 41st and Alameda Warehouse Project) and at that time there would be 264 truck trips per day. In the recent DEIR PIMA will be developing 481,022 sq. ft. of warehouse space; comprised of 4 buildings and over 2000 car trips per day. In PIMA's proposal they claim a mere 75 trip trucks a day. There is a difference of 189 truck trips per days for a warehouse space that is 10% larger. There is a difference of 70% in truck trips. What is problematic with this assumption is that all further analysis will be based on the underspecified 75 truck trips per day. While this under estimation of the truck trips may get the project approved by the City; the city under Jan Perry has supported this project, it will have long negative impact on the residents of South Los Angeles. In the realm of Air Quality Health Risk Assessment the truck trips are further down estimated to 31 diesel fueled trucks per day. The Kleinfelder's Health Risk Analysis is faulty because it also assumes a degraded amount of truck trips per day; 75 truck trips per day.

[68] Harris, Kamala D. 10 July 2012. *Environmental Justice at the Local and Regional Level: Legal Background*. Prepared by State of California Department of Justice. Available at: http://oag.ca.gov/sites/all/files/agweb/pdfs/environment/ej_fact_sheet.pdf

RESPONSE NO. E79-2

The City of Los Angeles has noted the concern about the discrepancy in the number of truck trips and the resulting health risks. A total of 351 truck trips is assumed in the Air Quality Health Risk Assessment (Appendix V in Volume IV of the Draft EIR) and Section IV.B, *Air Quality*, of the Draft EIR based on the Addendum to the Traffic Impact Study (Appendix IX in Volume VI of the Draft EIR). Of the 351 truck trips, EMFAC 2011 estimates that on average 9 percent of the total trucks are diesel fueled trucks for an estimate of 31 diesel-fueled trucks as mentioned in the Human Health Risk Analysis portion of Section IV.B *Air Quality* of the Draft EIR.

The Draft EIR states on page IV.G-13 that

> *It is calculated that the proposed project will generate approximately 1,966 net passenger car equivalent (PCE) trips per average day. The average weekday net new peak hour PCE trips will be approximately 179 trips during the a.m. peak hour and 190 trips during the p.m. peak hours (Figure IV.G-6, Distribution of Project Traffic, and Figure IV.G-7, Existing [2014] plus Project Traffic Volumes). The traffic analysis also considered the distribution of trips during a.m. and p.m. peak hours in the vicinity of the proposed project (Figure IV.G- 8, Project Traffic at Driveways and Adjacent Intersections).*
>
> *While these estimates were developed based on the ITE's Trip Generation Manual, the project applicant has indicated that truck trips associated with operation of the proposed project would not exceed 75 daily truck trips, which has therefore been analyzed as Alternative C in this Draft EIR (see Attachment E to the Initial Study, which is Appendix III of this Draft EIR).*

The 75 truck trips identified in Alternative C stem from the existing operations at various facilities, which will be consolidated in the proposed project. Currently, there is a maximum of 33 truck trips/day total for the various facilities. The proposed project build out is not expected to significantly increase this number of trips; hence, 75 daily truck trips were taken as the assumption in Alternative C of the Draft EIR.

COMMENT NO. E79-3

Regional Air Quality

The air quality in Southern California does not meet the state and federal standards. The American Lung Association consistently gives Los Angeles County failing grades in the amount of ozone and particulate pollution in the air. Although smog levels are impacted by seasons and weather patterns, smog is visible in the air on most days.

RESPONSE NO. E79-3

The City of Los Angeles has noted the comment about poor air quality in the region as defined by the American Lung Association. The American Lung Association gives an "F" rating for ozone, particulate pollution (24-hour), and particulate pollution (annual) for Los Angeles County. In regard to the California Ambient Air Quality Standards, Los Angeles County has also been designated nonattainment for ozone, PM_{10}, $PM_{2.5}$, nitrogen dioxide, and lead. The Draft EIR evaluates the proposed project with respect to the State CEQA Guidelines. Construction and operations emissions were modeled and compared to the South Coast Air Quality Management District (SCAQMD) Significance Thresholds. Only the PM_{10} construction emissions were found to exceed the SCAQMD significance threshold by 5.6 lbs/day. Mitigation measures are described in the Draft EIR on page IV.B-23 and IV.B-24, which reduce air quality impacts below the threshold of significance. All other criteria pollutants are expected to be below the SCAQMD significance

thresholds for both construction and operation phases. The proposed project is expected to be consistent with the regional 2012 Air Quality Management Plan. Please see pages IV.B-16, IV.B-17, and IV.B-19 of the Draft EIR for further information regarding the proposed project's consistency with state and regional air quality plans.

LETTER NO. E80

Marcy Winograd

COMMENT NO. E80-1

I am a former congressional candidate, now public high school teacher at LAUSD'S Venice HS in Los Angeles, where my students are fortunate to learn about organic gardening at the school's wonderful community garden. Previously, I taught at Manual Arts HS and Crenshaw HS, both located in South LA where youth Diabetes Type II has reached epic proportions, community gardens are lacking, and food deserts deny families access to healthy food.

The DEIR's conclusion that community gardens do not carry local community value and economic benefits is way off base, and, frankly, insensitive to communities of color. For my former students, for the people of South LA, access to healthy food – broccoli, asparagus, tomatoes (as opposed to chips, sodas, and candy), as well as skills to produce this food -- are matters of life and death, of sight and blindness. In essence, the DEIR's conclusion negating community value of organic gardens sends a Marie Antoinette message – not let them eat cake, but let them feast on salt, sugar, and fat while other more fortunate areas of Los Angeles enjoy the privilege of eating healthy food and living robust lives.

RESPONSE NO. E80-1

Your comment regarding the value of community gardens and access to healthy foods has been noted. The commenter's opinion on the conclusions of the Draft EIR has been noted and forwarded to the decision makers prior to taking action on the proposed project.

COMMENT NO. E80-2

I was equally appalled to read that the DEIR fails to recognize the community value in using the land for recreational purposes. Are we to believe there is a positive net gain in setting aside the land for polluting industrial use, for possible release of carcinogens and other toxins, rather than giving the children of Los Angeles a place to play and run and get in shape? This is a shameful conclusion, truly embarrassing to read.

RESPONSE NO. E80-2

The City of Los Angeles has noted the comment about industrial use and potential alternative land uses at the proposed project site. Section 15126.6 of the CEQA Guidelines requires an EIR to describe a range of reasonable alternatives to a project or to the location of a project that would feasibly attain most of the basic objectives of a project but would avoid or substantially lessen any of the significant effects of a project, and evaluate the comparative merits of the alternatives. The discussion of alternatives, however, need not be exhaustive, but rather the discussion must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. An EIR is not required to consider alternatives that are deemed "infeasible." In developing alternatives, the following factors are considered: (i) ability to meet most of the basic project objectives, (ii) feasibility, or (iii) ability to avoid or substantially lessen significant environmental impacts.

As set forth in Section VI of the Draft EIR on pages VI-3 to VI-4, the Community Garden alternative, requested through public comments, considered development of the project for an alternate land use, specifically a community garden. However, this alternative was withdrawn from consideration as it does not meet the basic project objectives:

- A community garden or park would not attain the objective of providing a minimum of 480,000 square feet of light industrial space, consistent with the existing land use designation and zoning.

- A community garden or park would not provide light manufacturing jobs within 3 miles of an existing garment manufacturing labor force in the Southeast Los Angeles Community Plan Area.

- A community garden or park would not allow for development of an industrial park that is along the Alameda Corridor to take advantage of distribution efficiency opportunities.

- A community garden or park would not facilitate the ability of existing garment labor force, located in close proximity to the project site to utilize existing public transit system and other multi-modal transportation opportunities in vicinity of proposed project.

- A community garden or park would not preserve and/or redevelop the industrial sector of the Southeast Los Angeles Community Plan Area to accommodate emerging technologies, thus providing an enhanced employment base for the Community Plan Area's population.

- A community garden or park would not benefit the Southeast Los Angeles Community Plan area population as economic stimulation through employment opportunities, attracting commercial and industrial tenants to the area, and providing tax revenue for the City would not occur.

The proposed use of the property as light manufacturing is consistent with land use planning objectives articulated in the Southeast Los Angeles Community Plan. The City of Los Angeles Southeast Los Angeles Community Plan has designated the project site as light industrial. The land use designation discourages nonindustrial uses and uses that compromise job-producing potential. Plan Goal 3 supports sufficient land for a variety of industrial uses with maximum employment opportunities, which are safe for the environment and the work force, and which have minimal adverse impacts on adjacent uses. The South East Los Angeles Community Plan further supports the retention and redevelopment of the industrial sector through Objective 3-1, Policy 3-1.1, and Objective 3-2, Policy 3-2.1:

> **Objective 3-1** To provide for existing and future industrial uses which contribute job opportunities for residents and which minimize environmental and visual impacts to the community.
>
> **Policies 3-1.1** Designate lands for the continuation of existing industry and development of new industrial parks, research and development uses, light manufacturing, and similar uses which provide employment opportunities.
>
> **Objective 3-2** To retain industrial plan designations to maintain the industrial employment base for community residents and to increase it whenever possible.
>
> **Policies 3-2.1** The significant, large industrially planned parcels located in predominantly industrial areas associated with the railroad transportation facilities along Alameda and in the Slauson area should be protected from development by other uses which do not support the industrial base of the community, and the City.

The Southeast Los Angeles Community Plan's open space goals and objectives support the preservation of existing open space and the development of new open space, in balance with new development, to serve the recreational, environmental, health and safety needs of the community. The objectives further note that the "Plan Map designates lands for open spaces including parklands." As noted above, the project site is in an industrial corridor adjacent to the Alameda Corridor rail line, and it is not designated for open space on the plan map. The area surrounding the proposed project site is developed almost exclusively with light and heavy industrial uses, with limited small lot single family residential homes intermixed with light/industrial warehouse uses to the south and residential areas farther to the west. The Alameda Corridor rail line is located directly to the east and runs below grade in the project area, and also includes the Southern Pacific Railroad right-of-way across South Alameda Street. The Metro Blue Line light rail is located immediately to the west of the project site. The nearest designated open space is the Ross Snyder Recreation Center, located 0.2 mile west of the proposed project site.

The applicant acknowledges the former interim use of the project site as a community garden that occurred under previous ownership. However, the use was discontinued in 2006, and the project site is currently vacant underutilized land in an industrially zoned area. Appendix XII and Section III.E of the Draft EIR provide details of a 2003 settlement agreement between the prior owner and the City of Los Angeles to dedicate 2.6 acres of the property for maintenance of a park for recreation and park purposes, and subsequent amendment of the agreement to allow the proposed project to be developed. This amendment for the cash pledge provided the City or a nonprofit organization with the funds to dedicate a park in a more appropriate location than the project site, which is industrially zoned and isolated to the west and east by major rail lines. The City Council accordingly determined that establishment of an active use park on the property is inappropriate due to the property's location in an industrial corridor, and authorized execution of a Cash Pledge Agreement whereby a payment in the amount of $3,573,365 was made to improve and provide recreational and park facilities at more suitable alternate sites in the vicinity of the property (see Report of the Chief Legislative Analyst, Ordinance No. 181949, and City Council Motion included in Appendix XII of the Draft EIR). The value of the cash pledge was determined on the basis of the pro rata value of the 2.6 acres to be set aside for recreational purposes pursuant to the settlement agreement relative to the overall purchase price of the project site. For further information on the site background and cash pledge agreement for park and recreational uses, please see pages IV-3 and IV-4 of the Corrections and Additions section of this Final EIR, and pages III-6 and III-7 and Appendix XII of the Draft EIR.

As stated in the Draft EIR and summarized above, the project's cash pledge agreement will contribute to open space in the City in a more suitable location, while the project site would be developed consistent with its Community Plan designation, goals and policies, and the project objectives. As a result, the project is consistent with the Open Space Element.

The Existing Conditions section in Section IV.B *Air Quality* of the Draft EIR includes ambient air quality data gathered from the local air quality monitoring stations. The average concentrations and days above the standard for each criteria air pollutant are listed in Table IV.B-6 *Summary of 2010-2012 Ambient Air Quality Data in the Proposed Project Vicinity* on page IV.B-11 of the Draft EIR. The Air Quality impact analysis relative to the impacts of the proposed project is further detailed below, and is located in Section IV.B *Air Quality* of the Draft EIR. In the Draft EIR, sensitive receptors are defined on page IV.B-11. There are two maps showing their locations: Figure IV.B-1 *Sensitive Receptors* and Figure IV. B-2 *Receptor Grid and Sensitive Receptors*.

Construction emissions are shown in Table IV.B-8, *Unmitigated Estimated Daily Regional Construction Emissions,* and are only significant for PM_{10}. Operational emissions are shown in Table IV.B-9, *Unmitigated Estimated Daily Operational Emissions*, and are not significant for any of the criteria air

pollutants. The PM_{10} emissions from construction will be mitigated to below the level of significance with the implementation of the seven mitigation measures.

The primary sources of TAC emissions associated with the proposed project's operations would be limited to DPM from delivery trucks. The results of the TAC analysis are shown in Table IV.B-11, Summary of DPM Health Impact Results. As described in Section IV.B (pages IV.B-22) of the Draft EIR, the resulting maximum potential cancer risk is 0.3 in a million, which is only 3 percent of the cancer risk threshold of 10 in a million as set by SCAQMD Rule 1401.

Diesel emissions are particularly examined in the Health Risk Assessment (HRA) found in Appendix V in Volume IV of the Draft EIR. The Draft EIR concluded that noise from the proposed project would have a less than significant impact. Please refer to the Initial Study in Appendix III of this Draft EIR, and to Appendix IS-1, Noise Technical Report, for further information. Cumulative air quality impacts are further discussed on pages IV.B-22 and IV.B-23 of the Draft EIR.

The Department of Toxic Substances Control (DTSC) has reviewed the site characterization and health risk assessment for the site and has concluded that the site is suitable for Industrial/Commercial use, and that future development or rezoning of the property for other than Industrial/Commercial use will require additional analysis and risk evaluation by DTSC to determine the suitability of the site for such use (included as Appendix N to the Final EIR).[69]

COMMENT NO. E80-3

Please re-do this DEIR to take into consideration the abundant community values in using this land for gardening and recreation.

RESPONSE NO. E80-3

Your comment on using the project site for gardening and recreational uses has been noted. As detailed in Response to Comment No. E80-2, the alternatives analysis withdrew the community garden and recreation alternatives from further consideration as they did not meet basic objectives of the project.

[69] Department of Toxic Substances Control. 22 December 2015. Letter from Brownfields and Environmental Restoration Program—Chatsworth Office, Haissam Y. Salloum, Senior Engineer, to City of Los Angeles, Department of City Planning, William Lamborn.

LETTER NO. E81

Carol Yost

COMMENT NO. E81-1

South LA Sweatshops will have long term detrimental health impact to the residents of South Central Los Angeles

The City Planning Department has announced its intention to allow 4 warehouses to be built with a substandard Draft Environmental Impact Report (Case Number: ENV-2012-920-EIR, AA-2012-919-PMLA, DIR-2013-887-SPR), a move Farm representatives and the community say will have long term detrimental health impacts for local South LA residents. Plans call for 4 warehouse facilities that will draw some 75 diesel big rigs into the area every day, creating an intolerable concentration of diesel fumes and particulate matter in a neighborhood in a warehousing district already saturated with such exhaust, posing the danger of increased risks of cancer, emphysema, asthma, and increased hospitalizations to poor people of color who live in the district. South Central Farm representative Tezozomoc said, "This is an unmistakable and undeniable threat to the health and well being of the people who live here, and that the City Planning Department has accepted a substandard Draft Environmental Impact Report on behalf of PIMA is a clear cut example of environmental racism." I call on the city, "to unconditionally reject the DEIR and return the land to the community to anchor an environmental justice project to begin to clean up the community".

RESPONSE NO. E81-1

Your comment in regard to the health risks from the diesel truck trips generated by the proposed project has been noted. The construction phase air quality impact analysis can be found in the Impact Analysis portion of Section IV.B *Air Quality* of the Draft EIR. Construction related toxic air contaminants (TACs) from diesel particulate emissions will be short-lived (3 months), and therefore do not require a Health Risk Assessment (HRA) from the Office of Environmental Health Hazard Assessment (OEHHA). Diesel particulate emissions only affect the population on a long-term (70-year) basis for cancer impacts, so the impact of short-term TACs from the construction of the proposed project is considered less than significant, as analyzed in Section IV.B (pages IV.B-15 through -18) of the Draft EIR. Construction emissions were analyzed for the six main criteria air pollutants as evident in Table IV.B-8. Emissions from VOCs, NOx, CO, SOx, and $PM_{2.5}$ were calculated to be below the SCAQMD significance threshold. PM_{10}, does have a significant impact during the construction phase, but it can be reduced to below the level of significance with mitigation measures.

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of the Draft EIR, and were found to be below thresholds of significance established by SCAQMD. Therefore, the proposed project would not result in significant human health risks related to diesel emissions. Further details on the air quality impacts analysis in the operational phase can be found in pages IV.B18 –B22 of the Draft EIR.

With Alternative C, Reduced Truck Operations, truck trips would be limited to 75 truck trips per day. As a result, the maximum cancer risk drops to 0.6 percent of the allowable threshold. The alternatives with clean fuel trucks and reduced truck operations would result in fewer diesel emissions.

CEQA centers on whether a project may have a significant effect on the physical environment (CEQA Guidelines, 15064(d)). The purpose of an environmental impact report is to identify the significant effects on the environment of a project, to identify alternatives to the project, and to indicate the manner in which those significant effects can be mitigated or avoided (Pub. Res. Code, §21002.1 subd. (a)). Environmental justice is not considered an area of impact under CEQA, and CEQA does not ask that a project mitigate preexisting conditions. As noted in CEQA Guidelines Section 15064(b), the significance of an activity may vary with the environmental setting. Where there already is a high pollution burden on a community, the relevant question is whether an additional amount of pollution should be considered significant in light of the serious nature of the existing problem.[70]

The Existing Conditions section in Section IV.B *Air Quality* of the Draft EIR includes ambient air quality data gathered from the local air quality monitoring stations. The average concentrations and days above the standard for each criteria air pollutant are listed in Table IV.B-6 *Summary of 2010-2012 Ambient Air Quality Data in the Proposed Project Vicinity* on page IV.B-11 of the Draft EIR. The Air Quality impact analysis relative to the impacts of the proposed project has been further detailed above in this Response to Comment No. E81-1, and is located in Section IV.B *Air Quality* of the Draft EIR. In the Draft EIR, sensitive receptors are defined on page IV.B-11. There are two maps showing their locations: Figure IV.B-1 *Sensitive Receptors* and Figure IV. B-2 *Receptor Grid and Sensitive Receptors*.

COMMENT NO. E81-2

It is clear that Los Angeles City has failed the residents of South LA by considering a substandard DEIR. In 2008 the City of Los Angeles reviewed a project submitted by Horowitz to do one warehouse that encompassed 437,196 sq. ft. (see Case No. ENV-2008-799-MND, VTT-61482, DIR-2008-841-SPR, aka 41st and Alameda Warehouse Project) and at that time there would be 264 truck trips per day. In the recent DEIR PIMA will be developing 481,022 sq. ft. of warehouse space; comprised of 4 buildings and over 2000 car trips per day. In PIMA's proposal they claim a mere 75 trip trucks a day. There is a difference of 189 truck trips per days for a warehouse space that is 10% larger. There is a difference of 70% in truck trips. What is problematic with this assumption is that all further analysis will be based on the underspecified 75 truck trips per day. While this under estimation of the truck trips may get the project approved by the City; the city under Jan Perry has supported this project, it will have long negative impact on the residents of South Los Angeles. In the realm of Air Quality Health Risk Assessment the truck trips are further down estimated to 31 diesel fueled trucks per day. The Kleinfelder's Health Risk Analysis is faulty because it also assumes a degraded amount of truck trips per day; 75 truck trips per day.

[70] Harris, Kamala D. 10 July 2012. *Environmental Justice at the Local and Regional Level: Legal Background*. Prepared by State of California Department of Justice. Available at: http://oag.ca.gov/sites/all/files/agweb/pdfs/environment/ej_fact_sheet.pdf

RESPONSE NO. E81-2

The City of Los Angeles has noted the concern about the discrepancy in the number of truck trips and the resulting health risks. A total of 351 truck trips is assumed in the Air Quality Health Risk Assessment (Appendix V in Volume IV of the Draft EIR) and Section IV.B, *Air Quality*, of the Draft EIR based on the Addendum to the Traffic Impact Study (Appendix IX in Volume VI of the Draft EIR). Of the 351 truck trips, EMFAC 2011 estimates that on average 9 percent of the total trucks are diesel fueled trucks for an estimate of 31 diesel-fueled trucks as mentioned in the Human Health Risk Analysis portion of Section IV.B *Air Quality* of the Draft EIR.

The Draft EIR states on page IV.G-13 that

> *It is calculated that the proposed project will generate approximately 1,966 net passenger car equivalent (PCE) trips per average day. The average weekday net new peak hour PCE trips will be approximately 179 trips during the a.m. peak hour and 190 trips during the p.m. peak hours (Figure IV.G-6, Distribution of Project Traffic, and Figure IV.G-7, Existing [2014] plus Project Traffic Volumes). The traffic analysis also considered the distribution of trips during a.m. and p.m. peak hours in the vicinity of the proposed project (Figure IV.G- 8, Project Traffic at Driveways and Adjacent Intersections).*
>
> *While these estimates were developed based on the ITE's Trip Generation Manual, the project applicant has indicated that truck trips associated with operation of the proposed project would not exceed 75 daily truck trips, which has therefore been analyzed as Alternative C in this Draft EIR (see Attachment E to the Initial Study, which is Appendix III of this Draft EIR).*

The 75 truck trips identified in Alternative C stem from the existing operations at various facilities, which will be consolidated in the proposed project. Currently, there is a maximum of 33 truck trips/day total for the various facilities. The proposed project build out is not expected to significantly increase this number of trips; hence, 75 daily truck trips were taken as the assumption in Alternative C of the Draft EIR.

COMMENT NO. E81-3

Regional Air Quality

The air quality in Southern California does not meet the state and federal standards. The American Lung Association consistently gives Los Angeles County failing grades in the amount of ozone and particulate pollution in the air. Although smog levels are impacted by seasons and weather patterns, smog is visible in the air on most days.

RESPONSE NO. E81-3

The City of Los Angeles has noted the comment about poor air quality in the region as defined by the American Lung Association. The American Lung Association gives an "F" rating for ozone, particulate pollution (24-hour), and particulate pollution (annual) for Los Angeles County. In regard to the California Ambient Air Quality Standards, Los Angeles County has also been designated nonattainment for ozone, PM_{10}, $PM_{2.5}$, nitrogen dioxide, and lead. The Draft EIR evaluates the proposed project with respect to the State CEQA Guidelines. Construction and operations emissions were modeled and compared to the South Coast Air Quality Management District (SCAQMD) Significance Thresholds. Only the PM_{10} construction emissions were found to exceed the SCAQMD significance threshold by 5.6 lbs/day. Mitigation measures are described in the Draft EIR on page IV.B-23 and IV.B-24, which reduce air quality impacts below the threshold of significance. All other criteria pollutants are expected to be below the SCAQMD significance

thresholds for both construction and operation phases. The proposed project is expected to be consistent with the regional 2012 Air Quality Management Plan. Please see pages IV.B-16, IV.B-17, and IV.B-19 of the Draft EIR for further information regarding the proposed project's consistency with state and regional air quality plans.

IV. CORRECTIONS AND ADDITIONS TO DRAFT EIR

A. INTRODUCTION

Section IV consists of corrections and additions to the Draft EIR that have resulted from responses to comments received from agencies and the public. All clarifications and revisions to the Draft EIR were made to increase the understanding of the EIR. These changes are minor and do not change the findings or conclusions of the EIR. The Draft EIR was released for a public review period between January 22, 2015, and March 9, 2015. The review period met the CEQA-required 45-day review period, although the City of Los Angeles (City) extended it by one additional day, to end on March 9, 2015 (as noted in the NOC) and accepted 14 late letters of comments. The City received 6 letters or emails of comment on the Draft EIR from agencies and 82 letters and emails of comment from interested parties. An additional 88 email addresses were transmitted to the City as an attachment to an email in opposition to the proposed project.

The corrections and additions presented in this section provide information that is not required as a result of the following: new significant environmental impacts; substantial increases in the severity of the environmental impacts that have been proposed; the presentation of new, considerably different, and feasible alternatives or mitigation measures that would lessen the environmental impacts and were not adopted by the applicant; or the inadequacy of the Draft EIR. The updates presented in this section are consistent with the findings as presented in the EIR and/or are minor. In accordance with Section 15088.5 of the State CEQA Guidelines, recirculation of the EIR document is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR.

The revisions are organized by section and page number as they appear in the Draft EIR. Text deleted from the Draft EIR is shown in ~~strikethrough~~, and new text is underlined.

B. CORRECTIONS AND ADDITIONS

Cover Page

Project Description: Parcel Map No. AA-2012-919-PMLA and a Site Plan Review to permit the subdivision of one 562,314 ~~556,399~~ net square-foot parcel into four lots (Lot 1: 3.23 ~~3.14~~ net acres, Lot 2: 3.23 ~~3.14~~ net acres, Lot 3: 3.23 ~~3.14~~ net acres, and Lot 4: 3.23 ~~3.36~~ net acres) in the M2-2 Zone. The project includes the construction of four industrial buildings consisting of Building 1: 115,973 square feet and 123 ~~124~~ parking spaces, Building 2: 133,680 square feet and 79 ~~72~~ parking spaces, Building 3: 116,724 ~~116,972~~ square feet and 96 ~~97~~ parking spaces, and Building 4: 113,743 ~~114,397~~ square feet and 106 ~~75~~ parking spaces. The applicant is requesting the merger of the right-of-way of 40th Place and the two alleys north and south of 40th Place.

Section I
Introduction/Summary

Pp. I-4–5

Summary of the Project

The proposed project includes the construction of a new industrial park consisting of four buildings. Building 1 consists of a single story with a mezzanine that occupies approximately 115,973 total square feet and provides 123 ~~124~~ parking spaces; Building 2 consists of two stories that occupy approximately 133,680 total square feet and provides

79 ~~72~~ parking spaces; Building 3 consists of a single story with a mezzanine that occupies approximately 116,724 ~~116,972~~ total square feet and provides 96 ~~97~~ parking spaces; and Building 4 consists of a single story with a mezzanine that occupies approximately 113,743 ~~114,397~~ total square feet and provides 106 ~~75~~ parking spaces. In total, the proposed project would occupy approximately 353,375 ~~365,945~~ square feet of warehouse space, 112,745 ~~85,181~~ square feet of office space, and 14,000 ~~29,896~~ square feet of manufacturing space. The heights of each of the four buildings range from 37 feet to a maximum building height of 40 feet. Consistent with the policies of the Urban Design Chapter of the Southeast Los Angeles Community Plan, the proposed project design includes the installation of shielded exterior area lighting wall packs mounted to the faces of the buildings 29 feet above the finished floor to provide nighttime light shielding for the nearest residence, a duplex located approximately 150 feet west of the proposed front and side facades of the four proposed buildings. The proposed project has been designed with the rear of Buildings 1 and 2 and the rear of Buildings 3 and 4 facing each other, and the remaining three faces of each building have been designed with pedestrian-scale features such as decorative concrete panels in different shades of beige with gray trim and glazing to break up the building facades, mechanical roof equipment completely screened from view, enclosure of trash areas, and operable windows on the mezzanine level. Landscaped areas that vary in width from approximately 15 to 20 feet would be provided along the length of the eastern and western portions of the project site with outdoor seating and eating areas for employees. A landscape buffer would separate the public sidewalks from the parking lots, and the following street dedications would be made to the city:

- ~~12' street widening on Long Beach Avenue~~
- 5' street widening on Martin Luther King, Jr. Blvd.
- 8.5 street widening on the north and 12.5' street widening on the south of ~~24.5' street widening on~~ South Alameda Street
- 22' street widening on 41st Street

P. I-8 Mitigation Measure Cultural-1 has been revised here and in Section IV.C, *Cultural Resources*:

Measure Cultural-1

The impacts to cultural resources related directly or indirectly to the destruction of a unique paleontological resource from the proposed project shall be reduced to below the level of significance through the salvage and disposition of paleontological resources that result from all earthmoving activities involving disturbances of the older Quaternary Alluvium. Ground-disturbing activities, including, but not limited to, drilling, excavation, and trenching, greater than five feet of the surface have the potential to uncover significant vertebrate fossil remains. For this reason, the following is required as part of Mitigation Measure Cultural-1 to reduce the level of impacts regarding the destruction of a unique paleontological resource below the level of significance:

- Prior to any ground-disturbing activities, the Applicant ~~City of Los Angeles~~ shall be responsible for creating a site plan that indicates all locations of ground-disturbing activities that affect previously undisturbed native soils in areas located 5 feet below the ground surface or further and have the potential to contact older Quaternary Alluvium.

P. I-10 Mitigation Measure Cultural-2 has been revised here and in Section IV.C, *Cultural Resources*:

Measure Cultural-2

The impacts to cultural resources related to a substantial adverse change in the significance of an archaeological resource shall be reduced to below the level of significance through the identification and recordation of archaeological resources that result from all earthmoving activities that affect previously undisturbed native soils. Ground-disturbing activities, including, but not limited to, drilling, excavation, and trenching, have the potential to uncover significant archaeological resources. For this reason, the following is required as part of Mitigation Measure Cultural-2 to reduce the level of impacts regarding a substantial adverse change in the significance of an archaeological resource below the level of significance:

- Prior to any ground-disturbing activities, the Applicant ~~City of Los Angeles~~ shall be responsible for creating a site plan that indicates all locations of ground-disturbing activities that affect previously undisturbed native soils.

Section I
Introduction

P. I-17 Table I.G-1, *Summary of Significant Impacts*, has been revised under the Air Quality heading. Revisions to mitigation measures also apply to Section IV.B, *Air Quality*:

Impact	Mitigation Measure	Level of Significance after Mitigation
Air Quality		
Construction of the proposed project has the potential to exceed the SCAQMD thresholds of significance for daily regional construction emissions for PM_{10} through the use of heavy-duty construction equipment and through vehicle trips generated from construction workers traveling to and from the proposed project site.	***Measure Air-1*** During the construction phase of the project, the project applicant shall apply soil stabilizers for all unpaved roads (80 percent reduction in $PM_{2.5}$ and PM_{10} emissions). ***Measure Air-2*** During the construction phase of the project, the project applicant shall water exposed areas 3 times a day (61 percent reduction in $PM_{2.5}$ and PM_{10} emissions). ***Measure Air-3*** During the construction phase of the project, the project applicant shall ensure that vehicular speeds are reduced to 15 mph on unpaved roads. ***Measure Air-4*** The project applicant shall establish incentives for increased transit frequency- in compliance with the transportation demand management and trip reduction measures set forth in Section 12.26J of the Los Angeles Municipal Code, which include the following requirements for non-residential projects with more than 100,000 square feet of floor area. **(a) Development in excess of 25,000 square feet of gross floor area.** The owner shall provide a bulletin board, display case, or kiosk (displaying transportation information) where the greatest number of employees are likely to see it. The transportation information displayed should include, but is not limited to, the following: (1) Current routes and schedules for public transit serving the site; (2) Telephone numbers for referrals on transportation information including numbers for the regional ridesharing agency and local transit operations; (3) Ridesharing promotion material supplied by commuter-oriented organizations; (4) Regional/local bicycle route and facility information;	Implementation of air quality mitigation measures Air-1 through Air-7 would reduce fugitive dust emissions associated with construction activities (both construction $PM_{2.5}$ and PM_{10} emissions) to below the SCAQMD thresholds of significance. Therefore, through the implementation of mitigation measures Air-1 through Air-7, the proposed project's construction phase would not have a significant impact to air quality.

Impact	Mitigation Measure	Level of Significance after Mitigation
	(5) A listing of on-site services or facilities which are available for carpoolers, vanpoolers, bicyclists, and transit riders. **(b) Development in excess of 50,000 square feet of gross floor area.** The owner shall comply with Paragraph (a) above and in addition shall provide: (1) A designated parking area for employee carpools and vanpools as close as practical to the main pedestrian entrance(s) of the building(s). This area shall include at least ten percent of the parking spaces required for the site. The spaces shall be signed and striped sufficient to meet the employee demand for such spaces. The carpool/vanpool parking area shall be identified on the driveway and circulation plan upon application for a building permit; (2) One permanent, clearly identified (signed and striped) carpool/vanpool parking space for the first 50,000 to 100,000 square feet of gross floor area and one additional permanent, clearly identified (signed and striped) carpool/vanpool parking space for any development over 100,000 square feet of gross floor area; (3) Parking spaces clearly identified (signed and striped) shall be provided in the designated carpool/vanpool parking area at any time during the building's occupancy sufficient to meet employee demand for such spaces. Absent such demand, parking spaces within the designated carpool/vanpool parking area may be used by other vehicles; (4) No signed and striped parking spaces for carpool/vanpool parking shall displace any handicapped parking; (5) A statement that preferential carpool/vanpool spaces are available on-site and a description of the method for obtaining permission to use such spaces shall be included on the required transportation information board; (6) A minimum vertical clearance of 7 feet 2 inches shall be provided for all parking spaces and accessways used by vanpool vehicles when located within a parking structure; (7) Bicycle parking shall be provided in conformance with Section 12.21A16 of this Code. **(c) Development in excess of 100,000 square feet of gross floor area.** The owner shall comply with Paragraphs (a) and (b) above and shall provide: (1) A safe and convenient area in which carpool/vanpool vehicles may load and unload	

Impact	Mitigation Measure	Level of Significance after Mitigation
	passengers other than in their assigned parking area; (2) Sidewalks or other designated pathways following direct and safe routes from the external pedestrian circulation system to each building in the development; (3) If determined necessary by the City to mitigate the project impact, bus stop improvements shall be provided. The City will consult with the local bus service providers in determining appropriate improvements. When locating bus stops and/or planning building entrances, entrances shall be designed to provide safe and efficient access to nearby transit stations/stops; (4) Safe and convenient access from the external circulation system to bicycle parking facilities on-site. ***Measure Air-5*** The project applicant shall improve the pedestrian network for the project site to internally link all uses and connect with existing or planned external streets and pedestrian facilities contiguous with the project site. The project applicant shall identify street trees and streetscape improvements to connect site access points to nearby transit and bicycle facilities. ***Measure Air-6*** The project applicant shall provide traffic calming measures through street improvements. The applicant will be dedicating additional right-of-way along 41st Street, Alameda Street, and Martin Luther King, Jr. Boulevard. In connection with the street dedications and development of the proposed project, the applicant will be upgrading existing sidewalks, curb and gutter, as well as street trees, street lighting, and street furniture around the entire perimeter of the property in consultation with the City Department of Transportation and Department of Public Works. Upgrades to the existing sidewalks will require new curb cuts and crosswalks and the replacement of existing traffic signals at intersections. Additional traffic control devices will be installed as necessary and required to facilitate safe traffic circulation in and around the proposed project site. ***Measure Air-7*** The project applicant shall ensure low VOC paint is applied for interior and exterior uses [250 EF (g/L)].	

P. I-12 Table I.G-1, Summary of Significant Impacts, has been revised under the Transportation/Traffic heading. Revisions to mitigation measures also apply to Section IV.G, *Transportation/Traffic*:

Transportation/Traffic		
Implementation of the proposed project has the potential to result in significant impacts to traffic and circulation during construction and operation.	The project applicant has identified five measures to be undertaken during design, construction, and operation of the proposed project to avoid significant impacts related to traffic and circulation. ***Measure Traffic-1*** A construction work site control plan shall be submitted to the City of Los Angeles Department of Transportation (LADOT) for review and approval prior to the start of any construction work. The plan shall show the location of any roadway or sidewalk closures, traffic detours, haul routes, hours of operations, protective devices, warning signs and access to abutting properties. ***Measure Traffic -2*** All construction related traffic shall be restricted to off-peak hours. ***Measure Traffic-3*** 41st Street shall be reclassified to a Collector Street. A Collector Street requires a 22-foot half-width roadway within a 32-foot half-width right-of-way. ***Measure Traffic-4*** The project applicant shall provide the number of Code required parking spaces as specified by the Department of Building and Safety: • Building 1 consists of a single story with a mezzanine that occupies approximately 115,973 total square feet and provides 123 ~~124~~ parking spaces; • Building 2 consists of two stories that occupy approximately 133,680 total square feet and provides 79 ~~72~~ parking spaces; • Building 3 consists of a single story with a mezzanine that occupies approximately 116,724 ~~116,972~~ total square feet and provides 96 ~~97~~ parking spaces; and • Building 4 consists of a single story with a mezzanine that occupies approximately 113,743 ~~114,397~~ total square feet and provides 106 ~~75~~ parking spaces. ***Measure Traffic-5*** All driveways shall be Case 2 driveways and 30 feet and 18 feet wide for two-way and one-way operations, respectively.	Implementation of mitigation measures Traffic-1 through -5 would reduce impacts to traffic and circulation during construction and operation of the proposed project, ~~to below the level of significance.~~ However, significant impacts would remain at the intersection of Alameda Street / Washington Boulevard absent the consideration of proposed Alternative C, Reduced Truck Trips.

Section II
Environmental Setting

P. II-1 The title of Figure II.A-2, *Topographic Map with USGS 7.5-Minute Quadrangle*, following this page, has been revised to *Topographic Map with USGS 7.5-Minute Quadrangle <u>Index</u>*.

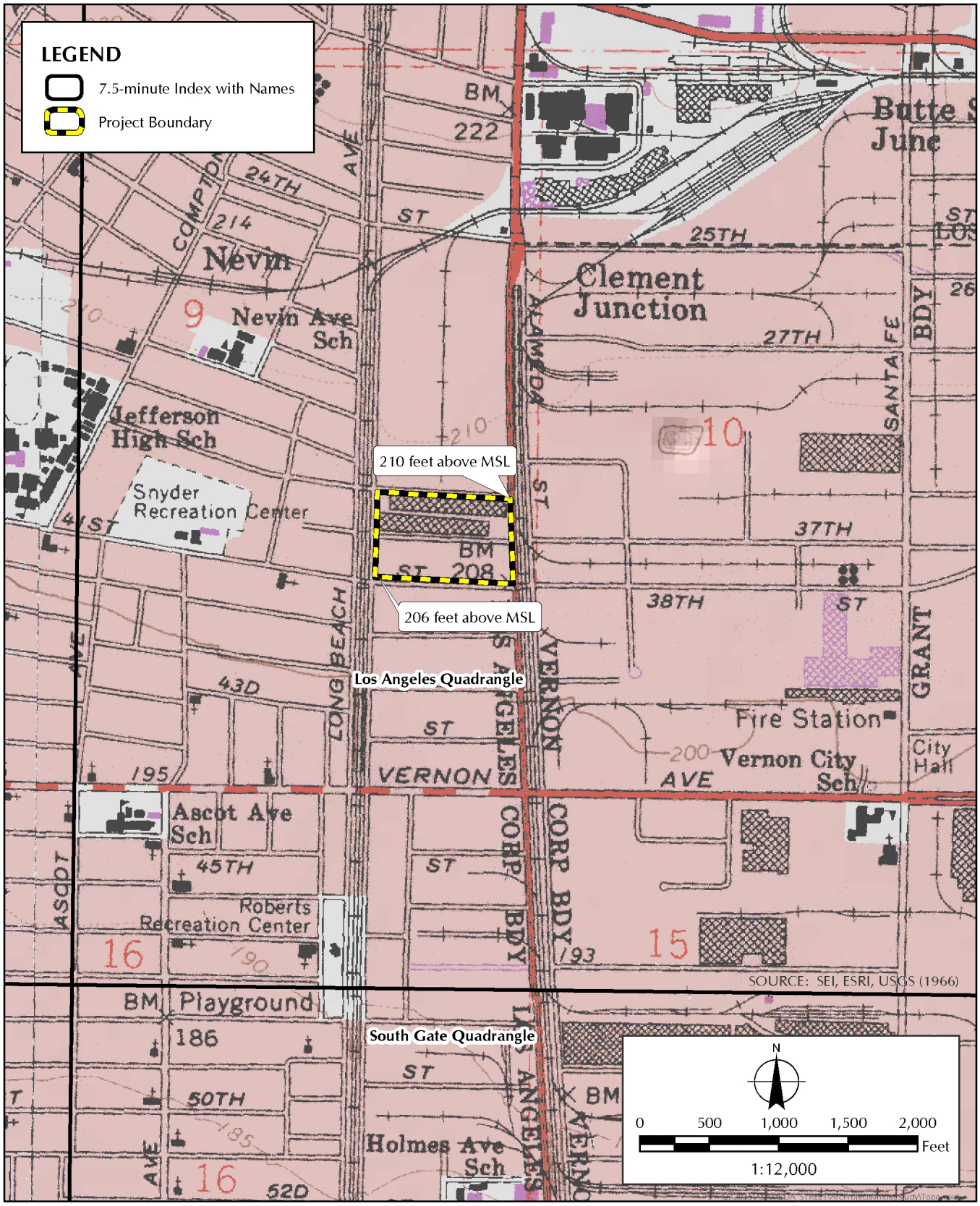


FIGURE II.A-2

Topographic Map with USGS 7.5-minute Quadrangle Index

Section III
Project Description

P. III-1

The proposed project includes the construction of a new industrial park consisting of four buildings. Building 1 consists of a single story with a mezzanine that occupies approximately 115,973 total square feet and provides 123 ~~124~~ parking spaces; Building 2 consists of two stories that occupy approximately 133,680 total square feet and provides 79 ~~72~~ parking spaces; Building 3 consists of a single story with a mezzanine that occupies approximately 116,724 ~~116,972~~ total square feet and provides 96 ~~97~~ parking spaces; and Building 4 consists of a single story with a mezzanine that occupies approximately 113,743 ~~114,397~~ total square feet and provides 106 ~~75~~ parking spaces (Figure III.B-1, *Conceptual Site Plan*). In total, the proposed project would occupy approximately 353,375 ~~365,945~~ square feet of warehouse space, 112,745 ~~85,181~~ square feet of office space, and 14,000 ~~29,896~~ square feet of manufacturing space. The heights of each of the four buildings range from 37 feet to a maximum building height of 40 feet (Figure III.B-2, *Building 1 Elevation*). Renderings of the proposed project are shown in Figures III.B-3, *Project Rendering—Aerial*, and III.B-4, *Project Rendering—Perspective*.

The proposed project has been designed consistent with the policies of the Urban Design Chapter of the Southeast Los Angeles Community Plan to provide safe and efficient space that has an appealing façade from adjacent public streets. The proposed project would include exterior concrete flatwork, pavement, and various utilities, and would consist of reinforced concrete tilt-up structural elements supported on conventional shallow spread footings. The proposed project design includes the installation of shielded exterior area lighting wall packs mounted to the faces of the buildings 29 feet above the finished floor to provide nighttime light shielding for the nearest residence, a duplex located approximately 150 feet west of the proposed project site at 4015 and 4017 Long Beach Avenue West. Surface parking would be located adjacent to the front and side facades of the four proposed buildings. Landscape islands are being provided throughout the parking areas in accordance with City requirements. 14.6 percent of the parking area will be landscaped. The proposed project has been designed with the rear of Buildings 1 and 2 and the rear of Buildings 3 and 4 facing each other, and the remaining three faces of each building have been designed with pedestrian-scale features such as decorative concrete panels in different shades of beige with gray trim and glazing to break up the building facades, mechanical roof equipment completely screened from view, enclosure of trash areas, and operable windows on the mezzanine level. Landscaped areas that vary in width from approximately 15 to 20 feet will be provided along the length of the eastern and western portions of the project site with outdoor seating and eating areas for employees. A landscape buffer would separate the public sidewalks from the parking lots, and the following street dedications would be made to the city:

- ~~12' street widening on Long Beach Avenue~~
- 5' street widening on Martin Luther King, Jr. Blvd.
- 8.5' street widening on the north and 12.5' street widening on the south of ~~24.5' street widening on~~ South Alameda Street
- 22' street widening on 41st Street

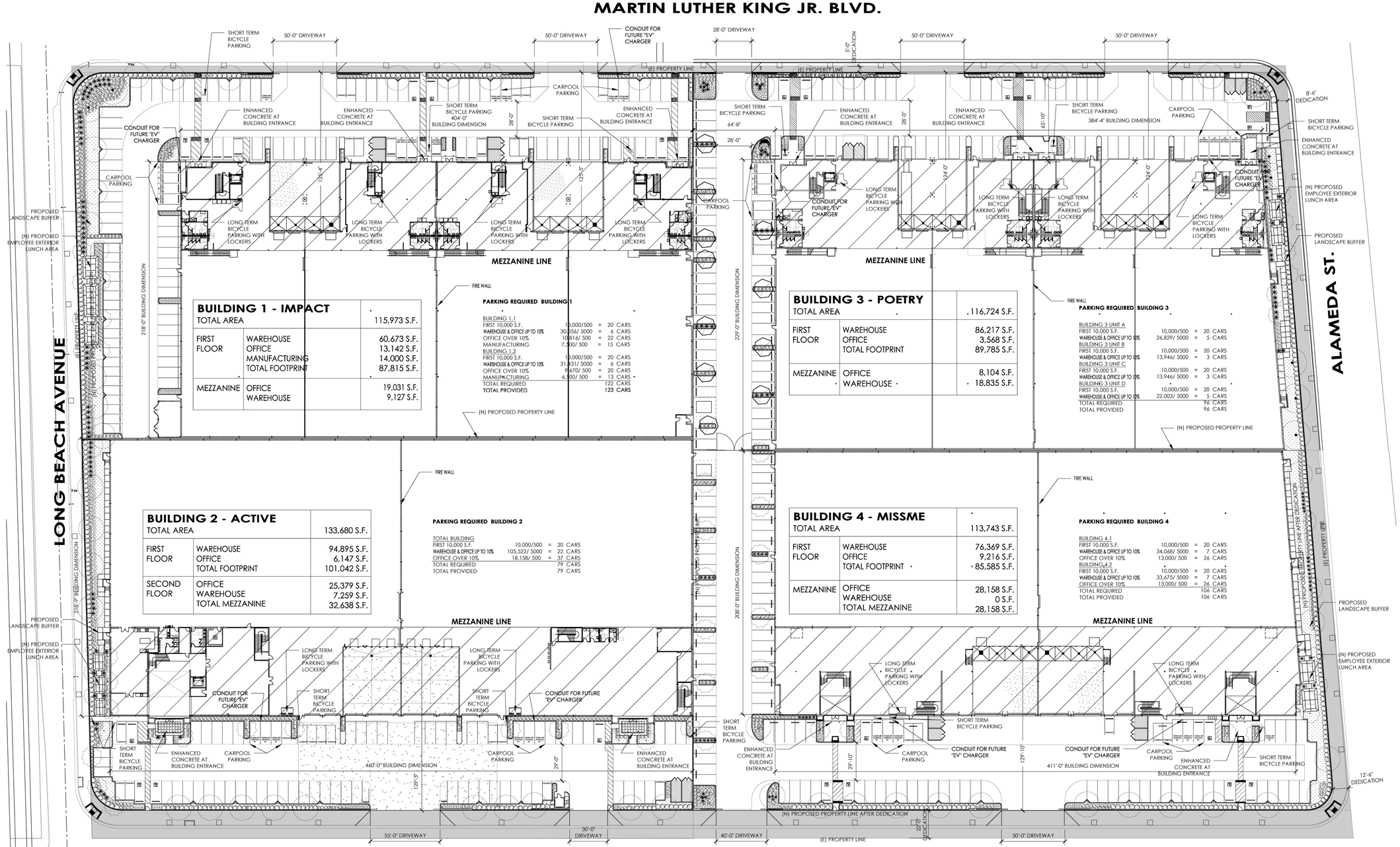
Page III-1

Figure III.B-1, *Conceptual Site Plan*, following this page, has been replaced with an updated site plan:

ALAMEDA INDUSTRIAL PARK

(4) WAREHOUSE AND OFFICE CONCRETE TILT UP BUILDINGS

4051 ALAMEDA ST., LOS ANGELES, CA



BUILDING 1 - IMPACT

TOTAL AREA		115,973 S.F.
FIRST FLOOR	WAREHOUSE	60,673 S.F.
	OFFICE	13,142 S.F.
	MANUFACTURING	14,000 S.F.
	TOTAL FOOTPRINT	87,815 S.F.
MEZZANINE	OFFICE	19,031 S.F.
	WAREHOUSE	9,127 S.F.

PARKING REQUIRED BUILDING 1

BUILDING 1-1			
FIRST 10,000 S.F.	10,000/500	=	20 CARS
WAREHOUSE & OFFICE UP TO 10%	30,056/ 5000	=	6 CARS
OFFICE OVER 10%	10,816/ 500	=	22 CARS
MANUFACTURING	7,500/ 500	=	15 CARS
BUILDING 1-2			
FIRST 10,000 S.F.	10,000/500	=	20 CARS
WAREHOUSE & OFFICE UP TO 10%	31,431/ 5000	=	6 CARS
OFFICE OVER 10%	9,670/ 500	=	20 CARS
MANUFACTURING	6,500/ 500	=	13 CARS
TOTAL REQUIRED			122 CARS
TOTAL PROVIDED			123 CARS

BUILDING 2 - ACTIVE

TOTAL AREA		133,680 S.F.
FIRST FLOOR	WAREHOUSE	94,895 S.F.
	OFFICE	6,147 S.F.
	TOTAL FOOTPRINT	101,042 S.F.
SECOND FLOOR	OFFICE	25,379 S.F.
	WAREHOUSE	7,259 S.F.
	TOTAL MEZZANINE	32,638 S.F.

PARKING REQUIRED BUILDING 2

TOTAL BUILDING			
FIRST 10,000 S.F.	10,000/500	=	20 CARS
WAREHOUSE & OFFICE UP TO 10%	105,522/ 5000	=	22 CARS
OFFICE OVER 10%	18,158/ 500	=	37 CARS
TOTAL REQUIRED			79 CARS
TOTAL PROVIDED			79 CARS

BUILDING 3 - POETRY

TOTAL AREA		116,724 S.F.
FIRST FLOOR	WAREHOUSE	86,217 S.F.
	OFFICE	3,568 S.F.
	TOTAL FOOTPRINT	89,785 S.F.
MEZZANINE	OFFICE	8,104 S.F.
	WAREHOUSE	18,835 S.F.

PARKING REQUIRED BUILDING 3

BUILDING 3 UNIT A			
FIRST 10,000 S.F.	10,000/500	=	20 CARS
WAREHOUSE & OFFICE UP TO 10%	26,829/ 5000	=	5 CARS
BUILDING 3 UNIT B			
FIRST 10,000 S.F.	10,000/500	=	20 CARS
WAREHOUSE & OFFICE UP TO 10%	13,946/ 5000	=	3 CARS
BUILDING 3 UNIT C			
FIRST 10,000 S.F.	10,000/500	=	20 CARS
WAREHOUSE & OFFICE UP TO 10%	13,946/ 5000	=	3 CARS
BUILDING 3 UNIT D			
FIRST 10,000 S.F.	10,000/500	=	20 CARS
WAREHOUSE & OFFICE UP TO 10%	22,003/ 5000	=	5 CARS
TOTAL REQUIRED			96 CARS
TOTAL PROVIDED			96 CARS

BUILDING 4 - MISSME

TOTAL AREA		113,743 S.F.
FIRST FLOOR	WAREHOUSE	76,369 S.F.
	OFFICE	9,216 S.F.
	TOTAL FOOTPRINT	85,585 S.F.
MEZZANINE	OFFICE	28,158 S.F.
	WAREHOUSE	0 S.F.
	TOTAL MEZZANINE	28,158 S.F.

PARKING REQUIRED BUILDING 4

BUILDING 4-1			
FIRST 10,000 S.F.	10,000/500	=	20 CARS
WAREHOUSE & OFFICE UP TO 10%	34,068/ 5000	=	7 CARS
OFFICE OVER 10%	13,000/ 500	=	26 CARS
BUILDING 4-2			
FIRST 10,000 S.F.	10,000/500	=	20 CARS
WAREHOUSE & OFFICE UP TO 10%	33,675/ 5000	=	7 CARS
OFFICE OVER 10%	13,000/ 500	=	26 CARS
TOTAL REQUIRED			106 CARS
TOTAL PROVIDED			106 CARS

SITE PLAN

SCALE 1/32" = 1'-0"



VICINITY MAP

NOT TO SCALE

5/3/2016 3:57 PM - Y:\2011\A-11-010 4051 E ALAMEDA\ALA-ARCH\ALA-A1.dwg

ADDRESS:

4051 ALAMEDA ST.
LOS ANGELES, CA
PROJECT NO. : A-11-010

DEVELOPER:

CHALMERS EQUITY GROU

7901 CROSSWAY DR.
PICO RIVERA, CA 90660
TEL (562) 948-4850
FAX (562) 948-1735

GENERAL CONTRACTOR:

C.E.G. CONSTRUCTION
7901 CROSSWAY DR. PICO RIVERA, CA 90660
TEL (562)942-9804 FAX (562)948-1735

DESIGN:

O.C. DESIGN & ENGINEERING
7901 CROSSWAY DR. PICO RIVERA, CA 90660
TEL (562)942-9804 FAX (562)948-1735

SITE ANALYSIS

CITY OF LOS ANGELES DEPT. OF BUILDING AND SAFETY
SUBJECT TO SITE PLAN REVIEW TO CITY OF LOS ANGELES

DESCRIPTION	AREAS
ZONING	M 2 (HEAVY MANUF.)
LEGAL DESCRIPTION	E. JEFFERSON ST. TRACT #1 EX OF ST LOT 173 & ALL LOTS 165 THRU 172, E. JEFFERSON ST. TRACT #1 EX OF ST LOT 106 & ALL LOTS 107 THRU 115
ASSESSOR'S PARCEL NO:	5117-021-020 5117-021-023
BUILDING CODE	CBC 2010
BLDG. OCCUPANCY	B S-1, F-1
BUILDING TYPE	III-B, FULLY SPRINKLERED
LAND AREA : (PARCEL AREA)	562,314 S.F. (12.90 AC)
COVERAGE :	85%
ALLOWABLE AREA	100%
TOTAL AREA	**480,120 S.F.**
BUILDING 1 - IMPACT TOTAL AREA	115,973 S.F.
FIRST FLOOR — WAREHOUSE	60,673 S.F.
OFFICE	13,142 S.F.
MANUFACTURING	14,000 S.F.
TOTAL FOOTPRINT	87,815 S.F.
MEZZANINE — OFFICE	19,031 S.F.
WAREHOUSE	9,127 S.F.
BUILDING 2 - ACTIVE TOTAL AREA	133,680 S.F.
FIRST FLOOR — WAREHOUSE	94,895 S.F.
OFFICE	6,147 S.F.
TOTAL FOOTPRINT	101,042 S.F.
SECOND FLOOR — OFFICE	25,379 S.F.
WAREHOUSE	7,259 S.F.
TOTAL MEZZANINE	32,638 S.F.
BUILDING 3 - POETRY TOTAL AREA	116,724 S.F.
FIRST FLOOR — WAREHOUSE	86,217 S.F.
OFFICE	3,568 S.F.
TOTAL FOOTPRINT	89,785 S.F.
MEZZANINE — OFFICE	8,104 S.F.
WAREHOUSE	18,835 S.F.
BUILDING 4 - MISSME TOTAL AREA	113,743 S.F.
FIRST FLOOR — WAREHOUSE	76,369 S.F.
OFFICE	9,216 S.F.
TOTAL FOOTPRINT	85,585 S.F.
MEZZANINE — OFFICE	28,158 S.F.
WAREHOUSE	0 S.F.
TOTAL MEZZANINE	28,158 S.F.
TRASH ENCL. AREA PROVIDED	480 S.F.
LANDSCAPING PROVIDED	
BUILDING 1	8,261 S.F.
BUILDING 2	7,026 S.F.
BUILDING 3	7,778 S.F.
BUILDING 4	7,409 S.F.
TOTAL = 14.6% OF THE PARKING AREA AND 5.4% OF THE PARCEL	**30,474 S.F.**
+ 1 TREE PER EA 4 STALLS	

SITE PLAN

A-1

Pp. III-6–7 The proposed project site is known as the Lancer Property because it was acquired by the City through condemnation in 1986 for the purpose of constructing a trash incinerator known as the LANCER project. The condemnation judgment provided the Alameda-Barbara Investment Company (predecessor to the Libaw-Horowitz Investment Company), who owned 11 of the approximately 13-acre site, with a first right to repurchase should the City determine that the property was no longer needed for public use. The LANCER project was terminated due to community opposition, and in 1994 the City transferred the property to the Harbor Department for $13.3 million, who granted a revocable permit to the L.A. Regional Food Bank to occupy and use the site as a community garden.[6] In late 1994, the Harbor Department commenced negotiations with Libaw-Horowitz Investment Company in regard to the repurchase of the property, and by October 1996 a purchase and sale agreement had been signed by Mr. Libaw and Mr. Horowitz with the understanding that the agreement would be presented to the Board of Harbor Commissioners and City Council for consideration. In 2001, the Harbor Department informed Mr. Horowitz that it would not sell the property, instead offering it publicly for development under a long-term lease; in response, Libaw-Horowitz Investment Company filed suit against the City for breach of contract. Then, in April 2002, operations began on the Alameda Corridor, a rail-cargo expressway linking the Ports of Los Angeles and Long Beach to the inland transcontinental rail network on South Alameda Street, adjacent to the eastern side of the proposed project site, making the site valuable real estate for commercial or industrial development.[7] The City settled with Mr. Horowitz in closed negotiations in 2003, and the land was sold to Mr. Horowitz. As part of the settlement agreement, Libaw-Horowitz agreed to dedicate 2.6 acres of the property for park and recreational purposes. In January 2004, Mr. Horowitz gave written notice to the Food Bank that its revocable permit to occupy the land would terminate on February 29, 2004; the farmers filed a lawsuit arguing that the City's closed-session settlement with Mr. Horowitz violated their rights, and they were granted an injunction allowing them to remain on the land until the case was resolved in Mr. Horowitz's favor in June 2005.[8] The proposed project site was still used as a community garden until 2006, when the community garden was demolished~~, and the~~. The property has been vacant since 2006.

~~Pursuant to the 2003 settlement agreement regarding the Lancer Property (proposed project site), Libaw-Horowitz pledged to dedicate approximately 2.6 acres of the property back to the City of Los Angeles Department of Recreation and Parks or to a nonprofit community organization that would use and maintain the property for recreation and park purposes. The sale of the Lancer Property includes the pledged 2.6 acres. The amendment of the pledge agreement of 2.6 acres to a cash pledge allows for the proposed industrial park to be developed.~~ In June 2008, the City of Los Angeles circulated a Mitigated Negative Declaration to evaluate the proposed development of the property. The property owner, The Horowitz Group, served as the project applicant on behalf of a major Los Angeles-based garment manufacturer who expressed interest in purchasing the property to construct a high-ceiling warehouse facility. The 2008 proposed project would have involved developing the site with a 46-foot-high, two-story structure with subterranean parking of approximately 114,399 square feet for 306 cars. The project was supported by two loading areas, the main dock at East 41st Street and Long Beach Boulevard and the secondary dock along East Martin Luther King Jr. Boulevard. The main dock had the ability to concurrently serve seven (7) 65-foot trailer trucks and fourteen (14) 35-foot trailers. The second dock was designed to serve four (4) 65-foot trailers at one time. The Horowitz Group did not finalize a sale of the property to the proposed developer identified in 2008; therefore, the Horowitz Group did not seek final approval of this

version of the project.

The Horowitz Group worked with the City to substitute a cash pledge for the dedication of the 2.6 acres. The amendment allows for development of the property consistent with the land use designation and zoning and provides the City with the funds to dedicate a park in a more appropriate location than the proposed project site, which is industrially zoned~~,~~ and isolated to the east and west by major rail lines~~., and potentially harmful to children and senior citizens due to air pollutants associated with industrial operations (the~~. In 2011, the City Council accordingly authorized execution of a Cash Pledge Agreement whereby a payment in the amount of $3,573,365 was made to improve and provide recreational and park facilities in the vicinity of the property (see Report of the Chief Legislative Analyst, Ordinance No. 181949, and City Council Motion ~~are attached as~~included in Appendix XII ~~to~~of the Draft EIR).[9,10,11] The value of the cash pledge was determined on the basis of the pro rata value of the 2.6 acres to be set aside for recreational purposes pursuant to the settlement agreement relative to the overall purchase price of the project site.~~ The value of the cash pledge will be determined by the State Quimby Act of 1965 (Sections 17.12-A and 17.58 of the Los Angeles Municipal Code), which is intended by the State of California to establish local rates for Quimby fees in order for developers to dedicate 3 acres of parkland per 1,000 residents anticipated by the construction of dwelling units.[12] To convert a Quimby obligation in land (acres) into the Quimby fee, the land obligation is multiplied by the Representative Land Value (RLV) per acre for the Park Planning Area (PPA) in which the subdivision is located; RLVs are adjusted annually based upon changes in the Consumer Price Index.[13]

In March 2012, The Horowitz Group sold the property to the current owner, PIMA Alameda Partners, LLC (PIMA). In February 2013, Segal and REA Architecture, acting on behalf of PIMA, submitted an application to develop the 2051 Alameda Light Manufacturing project. In May 2013, the City circulated a Mitigated Negative Declaration for the proposed project. The City received many letters of comment regarding the proposed project. The City, with input from the Applicant, agreed that, in light of the comments received from the public, preparation of an exhaustive Initial Study was warranted. An Initial Study was prepared and circulated for public review between June 17 and July 17, 2014. The Department of City Planning received seven letters of comment from public agencies and 225 comment letters or emails from members of the public and other interested parties (see documentation provided in Appendix II, *Notice of Preparation Comment Letters* and Table I.A-1, *Initial Study Public Agency Comment Matrix of the EIR*). The Draft EIR has been prepared for a public review period between January 22 and March 9, 2015.

~~12~~ ~~County of Los Angeles Department of Regional Planning. October 2013. 2013 Draft General Plan 2035. Chapter 10: Parks and Recreation Element. Available at: http://planning.lacounty.gov/assets/upl/project/gp_2035_Chapter10_2013.pdf~~

~~13~~ ~~County of Los Angeles Department of Regional Planning. October 2013. 2013 Draft General Plan 2035. Chapter 10: Parks and Recreation Element. Available at: http://planning.lacounty.gov/assets/upl/project/gp_2035_Chapter10_2013.pdf~~

Section IV.A Aesthetics

P. IV.A-2 The proposed project would replace the currently vacant and undeveloped approximately 13-acre site in a Light Industrial zone with approximately 353,375 ~~365,945~~ square feet of warehouse space, 112,745 ~~85,181~~ square feet of office space, and 14,000 ~~29,896~~ square

feet of manufacturing space with subsequent parking lots in 37- to 40-foot-high two-story structures with surface parking.

Section IV.B
Air Quality

P. IV.B-4 SIPs are a compilation of new and previously submitted plans, programs (such as monitoring, modeling, permitting, etc.), district rules, state regulations, and federal controls. Many of California's SIPs rely on the same core set of control strategies, including emission standards for cars and heavy trucks, fuel regulations, and limits on emissions from consumer products. State law makes CARB the lead agency for all purposes related to the SIP. CARB forwards SIP revisions to the EPA for approval and publication in the *Federal Register*. The Code of Federal Regulations Title 40, Chapter I, Part 52, Subpart F, Section 52.220, lists all of the items included in the California SIP.

Truck and Bus Regulation: On-Road Heavy-Duty Diesel Vehicles (In-Use) Regulation

The On-Road Heavy-Duty Diesel Vehicles Regulation Amendments were approved by CARB in April 2014. The main objective of this regulation is to reduce emissions from heavy-duty diesel trucks and buses by installing new filters and upgrading engines. The regulation mandates that all new heavy-duty trucks and buses must have particulate matter filters that meet CARB requirements by January 1, 2012. Lighter and older heavy trucks must be replaced starting in January 1, 2015. All trucks and buses are required to have model year 2010 engines or equivalent by January 1, 2023. The scope of the regulation includes both public and private vehicles.

Off-Road Diesel Engines

P. IV.B-21 CARB mandates that airborne toxic control measures limit diesel fueled commercial vehicles (delivery trucks) to idle for no more than 5 minutes at any given time. The increase in potential localized air toxic impacts from on-site sources of DPM emissions have the potential to be substantial because the proposed project includes approximately 353,375 ~~365,945~~ square feet of warehouse space. For this reason, the project applicant shall ensure that diesel fueled commercial vehicles do not idle for more than 5 minutes at any given time to substantially limit the potential incremental increase in emissions from loading dock activity.

P. IV.B-22 There are a relatively small number of diesel-fueled trucks that will be using the proposed facility (up to 31 diesel-fueled trucks per day of the estimated 351~~342~~ total trucks per day).

Section IV.E
Greenhouse Gas Emissions

P. IV.D-10 Based on emissions modeling, unmitigated construction activities would result in the emission of a maximum of approximately 643.22 metric tons of CO2e (Table IV.D-3, *Unmitigated CO2 and CO2e Emissions*). Operation of the proposed project would result in the emission of approximately 2,090.25 metric tons of CO2e per year (Table IV.D-3). The operational GHG emissions can be attributed to mobile sources associated with the proposed project's approximate 353,375 ~~365,945~~ square feet of warehouse space. As is indicated in Table IV.D-3, the proposed project's construction and operational emissions

are not expected to exceed the CARB recommended threshold of 25,000 metric tons of CO2e per year, thus not requiring the consideration of mitigation measures.

Section IV.E
Hazards and Hazardous Materials

P.IV.E-10 Cancer risk and non-cancer hazard that may be associated with soil vapor intrusion were evaluated based on the presence of four VOCs reported in soil vapor samples, two of which were classified as carcinogens (tetrachloroethene and ethylbenzene), and two that were classified as non-cancer hazards (m, p-xylenes and Freon 11). The cancer risk estimate was 6×10^{-7}, which is less than the Cal/EPA regulatory point of departure for risk management decisions based on cancer risk. The non-cancer hazard index was 0.009, which is less than the Cal/EPA regulatory point of departure for risk management decisions based on non-cancer hazard. Therefore, further investigation or mitigation to protect indoor workers on the subject site is not required based on the vapor intrusion pathway. The Department of Toxic Substances Control (DTSC) has reviewed the site characterization and health risk assessment for the site and has concluded that the site is suitable for Industrial/Commercial use, and that future development or rezoning of the property for other than Industrial/Commercial use will require additional analysis and risk evaluation by DTSC to determine the suitability of the site for such use (included as Appendix N to the Final EIR).[31]

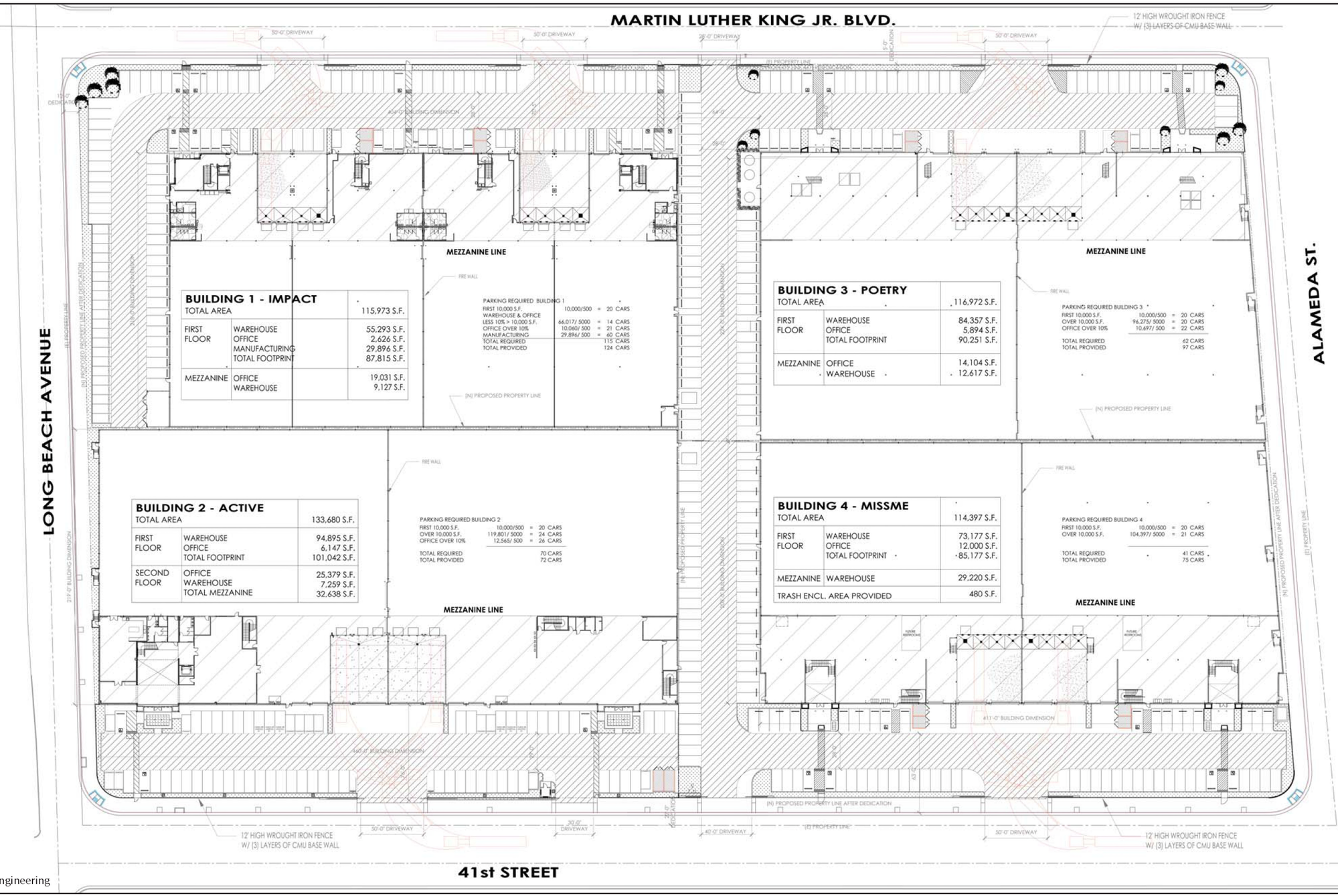
[31] Department of Toxic Substances Control. 22 December 2015. Letter from Brownfields and Environmental Restoration Program—Chatsworth Office, Haissam Y. Salloum, Senior Engineer, to City of Los Angeles, Department of City Planning, William Lamborn.

Section IV.F
Land Use and Planning

P. IV.F-9 As currently proposed, the proposed project consists of four buildings with approximately 353,375 ~~365,945~~ square feet of warehouse space, 112,745 ~~85,181~~ square feet of office space, and 14,000 ~~29,896~~ square feet of manufacturing space with associated on-site surface parking.

Section IV.G
Traffic

P. IV.G-5 Figure IV.G-1, *Access Driveways*, following this page, has been revised, and its title revised to *Access Driveways and Truck Maneuvering*.



SOURCE: O.C. Design & Engineering

FIGURE IV.G-1
Access Driveways and Truck Maneuvering

P.IV.G-12 The proposed project would result in ~~less than~~ significant impacts to transportation/traffic at the intersection of Alameda Street/Washington Boulevard in relation to conflicting with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system. The proposed project is located within the City of Los Angeles and is therefore subject to the California Transportation Plan (CTP), the Regional Transportation Plan (RTP), the City of Los Angeles General Plan, and the Southeast Los Angeles Community Plan. In order to accurately assess future traffic conditions with the proposed project and potential impacts to the applicable plans related to transportation, trip generation estimates were developed for the proposed project. Trip generation rates for the proposed project are based on the nationally recognized recommendations of the Institute of Transportation Engineers (ITE). ITE also provides information on percentage of truck traffic associated with this type of land use. Approximately 20 percent of all vehicular trips generated by a warehouse are designated as truck trips to allow evaluation of a reasonable worst-case scenario. A truck trip is generally equivalent to two (2) passenger car trips on average. Therefore, a 2.0 factor was applied to the number of truck trips to estimate passenger care equivalent (PCE) trips generated by the trucks.

Page IV.G-13 The LOS and V/C ratios for the study intersections with related proposed project traffic and under proposed project conditions for 2016 are summarized in Table IV.G-7, *Proposed Project Traffic Conditions for 2016* . The results indicate that all the study intersections will continue to operate at a LOS D or better (i.e., within the range of acceptable thresholds of LOS A through D) during a.m. and p.m. peak hours with the exception of Alameda Street/Washington Boulevard as further discussed on pages 2-9 of the Addendum to Traffic Impact Study in Appendix IX to this Draft EIR. It should be noted that with the assumption of 351 daily truck trips for the project, the study intersections, except the intersection of Alameda Street and Washington Boulevard, will show no significant impacts due to project traffic. However, in order to avoid significant impacts at the intersection of Alameda Street and Washington Boulevard, mitigation measures are required.

P. IV.G-14 Table IV.G-7, Proposed Project Traffic Conditions for 2016, has been revised as follows:

Table IV.G-7
Proposed Project Traffic Conditions for 2016[1]

Intersection	Peak Hour	Existing 2014 Conditions				Future 2016 Conditions				Increase in V/C Ratio
		Without Project		With Project		Without Project		With Project		
		LOS	V/C	LOS	V/C	LOS	V/C	LOS	V/C	
Alameda Street and 41st Street	A.M.	A	0.461	A	0.480	A	0.483	A	0.502	0.020
	P.M.	A	0.572	A	0.631	A	0.588	B	0.645	0.046
Alameda Street and Vernon Street	A.M.	B	0.671	B	0.690	B	0.691	C	0.712	0.016
	P.M.	B	0.652	B	0.660	B	0.669	B	0.677	0.007
Alameda Street and 24th Street	A.M.	A	0.583	A	0.589	B	0.611	B	0.616	0.005
	P.M.	B	0.669	B	0.686	B	0.688	C	0.705	0.013
Alameda Street and Washington Boulevard	A.M.	D	0.788	D	0.803	D	0.806	D	0.821	~~0.013~~0.015
	P.M.	D	0.872	D	0.888	D	0.893	~~D~~E	~~0.0904~~0.909	~~0.011~~0.016
Long Beach Avenue and 41st Street	A.M.	B	0.643	B	0.675	B	0.669	B	0.701	0.032
	P.M.	B	0.641	B	0.665	B	0.656	B	0.680	0.024
Long Beach Avenue and Vernon Street	A.M.	B	0.622	B	0.683	B	0.680	B	0.700	0.020
	P.M.	A	0.430	A	0.437	A	0.441	A	0.448	0.007
Long Beach Avenue and 24th Street	A.M.	A	0.435	A	0.437	A	0.459	A	0.461	0.002
	P.M.	C	0.701	C	0.703	C	0.722	C	0.723	0.001
I-10 Frwy EB Off-ramp and Alameda Street	A.M.	B	0.643	B	0.656	B	0.658	B	0.670	0.012
	P.M.	C	0.751	C	0.762	C	0.768	C	0.779	0.011
I-10 Frwy WB Off-ramp and Alameda Street	A.M.	B	0.639	B	0.653	B	0.654	B	0.669	0.015
	P.M.	C	0.751	C	0.756	C	0.768	C	0.773	0.005

Source: Traffic Design, Inc. 3 October 2014. Addendum to Traffic Impact Study. Prepared for Sage Strategies, LLC.

[1] This table is being revised consistent with Table 2 in Appendix IX, page 5, to the Draft EIR.

Page IV.G-15 Therefore, the results of the traffic analysis in conjunction with the ~~local hire agreement and~~ LADOT recommendations demonstrate that the proposed project would ~~not~~ result in significant impacts to transportation/traffic at Alameda Street/Washington Boulevard~~, and no further analysis related to creating a substantial increase in traffic is warranted~~.

(b) Conflict with an applicable congestion management program, including, but not limited to, level of service standards and travel demand measures; or other standards established by the county congestion management agency for designated roads or highways? Exceed, either individually or cumulatively, a level of service (LOS) standard established by the county congestion management agency for designated roads or highways?

The proposed project would result in ~~less than~~ significant impacts to transportation/traffic in relation to conflicting with an applicable congestion management program (CMP). As was presented in question (a), the proposed project's impact on future traffic conditions would ~~not~~ exceed a LOS ~~D~~ E standard ~~or better (i.e., within the range of acceptable thresholds of LOS A through D)~~ during ~~a.m. and~~ p.m. peak hours at Alameda Street/Washington Boulevard. ~~Additionally, through~~ Although the implementation of the local hire agreement ~~the proposed project~~ would reduce congestion impacts by enabling employees to utilize other modes of transportation including public transit, carpooling, bike riding, and walking, there would still be significant impacts to the intersection of Alameda Street/Washington Boulevard. Therefore, the proposed project would result in ~~less than~~ significant impacts to transportation/traffic~~, and no further analysis~~ related to conflicting with an applicable CMP.

Page IV.G-17 **CUMULATIVE IMPACTS**

The updated traffic impact analysis for the proposed project indicates that the proposed project will generate approximately 1,966 net PCE trips per average day, and the average weekday net new peak hour PCE trips will be approximately 179 trips during the a.m. peak hour, and 190 trips during the p.m. peak hour (Appendix IX).[20] Although these estimates were developed based on approximately 351 truck trips per day from the proposed project, the project applicant has indicated that truck trips associated with operation of the proposed project would not exceed 75 daily truck trips, which has therefore been analyzed as Alternative C in this Draft EIR. The results indicate that all of the study intersections would operate at an acceptable level of service (i.e., within the range of acceptable thresholds of LOS A through D) during the a.m. or the p.m. peak hours with 2016 post-project cumulative traffic volumes with project with the exception of the intersection of Alameda Street/Washington Boulevard which would operate at LOS E during p.m. peak hours, as further discussed in the Impact Analysis in this Section IV.G and in Appendix IX to the Draft EIR. The proposed project's off-site traffic impact would ~~not~~ be ~~considered~~ significant at ~~any of these~~ the intersections of Alameda Street/Washington Boulevard based on the increase in the Volume to Capacity (V/C) ratio due to the project. A project's traffic impact is determined to be significant if the increase in V/C ratio is 0.04 or more at LOS C, or 0.02 or more at LOS D, or 0.01 or more at LOS E and F. During p.m peak hours, the LOS impact at the intersection of Alameda Street/Washington Boulevard would be .016, which is greater than the 0.01 threshold at LOS E or F.

It was determined that there are 11 projects within a 2-mile radius of the proposed project site. Of these 11 projects, 5 are located in the direct trip path and near geographic

proximity to the proposed project site such that these related projects could affect the cumulative impact analysis of the proposed project within the construction period (Table II.B-1, *Related Projects*, Figure II.B-1, *Related Projects*). ~~However, as shown in~~ Table IV.G-7 (Future 2016 Conditions Without Project, which includes traffic from related projects, and Future 2016 Conditions With the Proposed Project, which includes traffic from related projects as well as the proposed project), shows that the proposed project would be expected to result in ~~a less than~~ significant cumulative impacts in relation to traffic and transportation at the intersection of Alameda Street/Washington Boulevard as the LOS with the project would be LOS E with the proposed project. As a result, ~~; and~~ the implementation of the proposed project would ~~not~~ be expected to result in cumulative impacts when considered with construction of the related past, present, or reasonably foreseeable projects.

Page IV.G-17 **MITIGATION MEASURES**

As indicated above, all of the study intersections would operate at an acceptable level of service (i.e., within the range of acceptable thresholds of LOS A through D) during the a.m. or the p.m. peak hours with 2016 post-project cumulative traffic volumes with project~~.~~ with the exception of the intersection of Alameda Street/Washington Boulevard, which would be LOS E with the proposed project. The proposed project's off-site traffic impact would ~~not be considered~~ be significant at ~~any of these intersections~~the intersection of Alameda Street/Washington Boulevard absent the consideration of Alternative C, Reduced Truck Trip alternative, based on the increase in the V/C ratio due to the proposed project. A project's traffic impact is determined to be significant if the increase in V/C ratio is 0.04 or more at LOS C, or 0.02 or more at LOS D, or 0.01 or more at LOS E and F.

The project applicant has identified five mitigation measures to be undertaken during design, construction, and operation of the proposed project to avoid significant impacts related to traffic and circulation.

Page IV.G-18 **LEVEL OF SIGNIFICANCE AFTER MITIGATION**

Implementation of mitigation measures Traffic-1 through Traffic-5 would reduce impacts to traffic and transportation facilities during construction and operation of the proposed project ~~to below the level of significance~~. However, significant impacts would remain at the intersection of Alameda Street/Washington Boulevard.

Section IV.H
Utilities and Service Systems

P. IV.H-5 To serve the residents, businesses, and industries of Los Angeles, the LADWP has more than 7,200 miles of pipelines; 699,600 service connections; 59,346 fire hydrants; over 70 pumping stations; and 110 reservoirs and tanks. From 2007 to 2011, the LADWP supplied about 197 billion gallons of water annually for the City's residential and business services.[7]

[7] City of Los Angeles Department of Water and Power. Accessed on February 24, 2016. *ladwp.com > About Us > Water > Past & Present* (https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-water/a-w-pastandpresent?_adf.ctrl-state=il7srf7qf_4&_afrLoop=399895236462180) ~~Villaraigosa, Antonio R. May 2008. Securing L.A.'s Water Supply. Prepared by the City of Los Angeles Department of Water and Power.~~

P. IV.H-8 The proposed project would not result in impacts to utilities and service systems in relation to the construction of new water or wastewater treatment facilities or expansion of facilities, causing significant environmental effects. The proposed project site would continue to be serviced by existing City water and wastewater utility lines. The City's Bureau of Sanitation has conducted a preliminary evaluation of the potential impacts to the wastewater and storm water systems for the proposed project and estimated that the proposed project would generate ~~27,267~~ 26,954 gallons per day of wastewater discharges.[13] Based on the estimated flows, the Bureau of Sanitation has determined that the sewer system may be adequate. However, additional analysis has indicated that the estimated flow will be 132,000 gallons per day. Given that the conservative estimate of the proposed project's discharge is expected to be 132,000 gallons per day, and the City's gauged capacity for the existing sewer system of 822,375 gallons per day, even with the project's discharge contribution there would still be 690,375 gallons per day of remaining capacity in the City's existing system. The City Bureau of Sanitation subsequently has reviewed the project applicant's calculations and revised its estimate of discharge for the project to be 132,000 GPD which is in accordance with the project applicant's calculations. This is reflected in the comment letter dated January 14, 2016[14] (Appendix P to the Final EIR). However, further gauging and evaluation may be required as part of the permit process, and final approval for sewer capacity and connection permit will be made at that time. ~~Further detail gauging and evaluation may be required as part of the permit.~~

[14] Poosti, Ali, City of Los Angeles, Division Manager, Wastewater Engineering Services Division, Bureau of Sanitation. January 14, 2016. Subject: 4051 South Alameda Street Project – Notice of Completion and Availability of Draft EIR (REVISED).

Wastewater from Building #1 would enter the sewer infrastructure from two existing laterals at the 8-inch sewer under Martin Luther King Jr. Blvd from the north with an expected flow of 53,760 gallons per day (GPD), which is far less than the 198,599 GPD gauged capacity by the City. Also, there are two existing laterals at the 10-inch sewer under Long Beach Avenue, with an expected flow of 25,440 GPD which is far less than the 394,453 GPD gauged capacity by the City. Wastewater from Building #2 would enter the sewer infrastructure from two existing laterals at the 8-inch sewer under East 41st Street, with an expected flow of 20,160 GPD, which is far less than the 294,000 to 427,000 GPD gauged capacity by the City. Wastewater from Building #3 would enter the sewer infrastructure from two new laterals under Martin Luther King Jr. Blvd, with an expected flow of 32,640 gallons per day, Wastewater from Building #4 would enter the sewer infrastructure from two new laterals under East 41st Street.

The proposed project area will be serviced by HTP, which has a design capacity of 450 mgd and treats an average of 362 mgd. Furthermore, in November 2006, the Los Angeles City Council approved the Integrated Resources Plan (IRP), which accounts for projected needs and sets forth improvements and upgrades to wastewater systems, recycled water systems, and runoff management programs in the City through the year 2020. The IRP addresses increases in wastewater flows through improvements, additions, and expansions within the HTP service area. These improvements would increase the capacity of the HTP service area to 570 mgd, consisting of HTP's capacity of 450 mgd, TWRP's new capacity of 100 mgd, and LAGWRP's capacity of 20 mgd.[15] As of today, all projects have been completed within treatment plants and sewer lines, and additional ongoing improvements have been proposed in order to continually provide services to meet wastewater needs for the City. Therefore, with the increased expansion of the HTP

service area and a remaining capacity of approximately 88 mgd at HTP, there would be no impacts to utilities and service systems related to the construction of new ~~water or~~ wastewater treatment facilities or expansion of facilities, causing significant environmental effects, and no further analysis is warranted.

The maximum water treatment capacity at the Los Angeles Aqueduct Filtration Plant (LAAFP) is 600 million gallons per day, or approximately 672,000 acre-feet per year (AFY). LAAFP typically treats water from LAA (Los Angeles Aqueduct) and purchases from MWD. The current average annual flow through LAAFP is approximately 362 million gallons per day, or 405,000 AFY (averaged over CY 2013). Exhibit 11E of LADWP's 2010 Urban Water Management Plan (UWMP) shows that the total annual water supplies from LAA and MWD between years 2020 through 2035 are less than 470,000 AFY. The project's water demand is accounted for in the City's future projected demands. Consequently, the current treatment capacity of LAAFP is estimated to be adequate to accommodate future demands. Therefore, there would be no impacts to utilities and service systems related to the construction of new water treatment facilities.

P.IV.H-9 (d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

The proposed project is consistent with growth projections anticipated by the SCAG. Consistency with the demographic projection for the City from the 2012 RTP is required for Proposed Project. City's water demand projection in the 2010 UWMP was developed based on the 2008 Regional Transportation Plan (RTP) demographic projection by the Southern California Association of Governments (SCAG) using the 2000 U.S. Census for the City. The 2012 RTP demographic projection for the City was based on the 2010 U.S. Census, and is lower than the 2008 RTP demographic projection. The region's economic growth is usually a major factor behind net migration and the consequent population growth. The economic recession of 2007-2009 had a negative impact on the region's population growth, resulting in decrease in population growth from 2000 Census to 2010 Census. Our preliminary analysis shows that the City water demand projection to year 2035 based on demographic projection from 2012 RTP using population, housing and employment, as well as water conservation, and weather will be lower than the City's water demand projection in the 2010 UWMP. As a result, City's water supply projections in the 2010 UWMP are sufficient to meet the City's water demand projections based on the 2012 RTP. As documented in the Initial Study (Appendix III), there are no impacts from water supplies to accommodate the project's existing entitlements and resources needs. No further analysis is warranted.

Section VI
Alternatives to the Proposed Project

P.VI-3 **Alternatives ~~Rejected~~ Withdrawn as Being Infeasible**

Alternate Land Use Alternative—Community Garden

This alternative, requested through public comments, considered development of the project for an alternate land use, specifically a community garden. However, this alternative was withdrawn from consideration for further analysis ~~rejected for further analysis, because it is inconsistent with the adopted Community Plan and existing land use designation and zoning. Development of the property as a community garden~~ as it does not meet the basic objectives of the project:

- A community garden would not attain the objective of providing a minimum of 480,000 square feet of light industrial space, consistent with the existing land use designation and zoning.

- A community garden would not provide light manufacturing jobs within 3 miles of an existing garment manufacturing labor force in the Southeast Los Angeles Community Plan Area.

- A community garden would not allow for development of an industrial park that is along the Alameda Corridor to take advantage of distribution efficiency opportunities.

- A community garden would not facilitate the ability of existing garment labor force, located in close proximity to the project site to utilize existing public transit system and other multi-modal transportation opportunities in vicinity of proposed project.

- A community garden would not preserve and/or redevelop the industrial sector of the Southeast Los Angeles Community Plan Area to accommodate emerging technologies, thus providing an enhanced employment base for the Community Plan Area's population.

- A community garden would not benefit the Southeast Los Angeles Community Plan area population as economic stimulation through employment opportunities, attracting commercial and industrial tenants to the area, and providing tax revenue for the City would not occur.

The proposed use of the property as light manufacturing is consistent with land use planning objectives articulated in the Southeast Los Angeles Community Plan. The City of Los Angeles Southeast Los Angeles Community Plan has designated the project site as light industrial. The land use designation discourages nonindustrial uses and uses that compromise job-producing potential. Plan Goal 3 supports sufficient land for a variety of industrial uses with maximum employment opportunities, which are safe for the environment and the work force, and which have minimal adverse impacts on adjacent uses. The South East Los Angeles Community Plan further supports the retention and redevelopment of the industrial sector through Objective 3-1, Policy 3-1.1, and Objective

3-2, Policy 3-2.1:

Objective 3-1 To provide for existing and future industrial uses which contribute job opportunities for residents and which minimize environmental and visual impacts to the community.

Policies
3-1.1 Designate lands for the continuation of existing industry and development of new industrial parks, research and development uses, light manufacturing, and similar uses which provide employment opportunities.

Objective 3-2 To retain industrial plan designations to maintain the industrial employment base for community residents and to increase it whenever possible.

Policies
3-2.1 The significant, large industrially planned parcels located in predominantly industrial areas associated with the railroad transportation facilities along Alameda and in the Slauson area should be protected from development by other uses which do not support the industrial base of the community, and the City.

The Southeast Los Angeles Community Plan's open space goals and objectives support the preservation of existing open space and the development of new open space, in balance with new development, to serve the recreational, environmental, health and safety needs of the community. The objectives further note that the "Plan Map designates lands for open spaces including parklands". As noted above, the project site is in an industrial corridor adjacent to the Alameda Corridor rail line, and it is not designated for open space on the plan map. The area surrounding the proposed project site is developed almost exclusively with light and heavy industrial uses, with limited small lot single family residential homes intermixed with light/industrial warehouse uses to the south and residential areas farther to the west. The Alameda Corridor rail line is located directly to the east and runs below grade in the project area, and also includes the Southern Pacific Railroad right-of-way across South Alameda Street. The Metro Blue Line light rail is located immediately to the west of the project site. The nearest designated open space is the Ross Snyder Recreation Center, located 0.2 miles west of the proposed project site.

Alternate Land Use Alternative—Park or Recreational Use

This alternative considered development of a portion of the property for an alternate land use, specifically a park or recreational use. However, this alternative was ~~rejected~~ withdrawn from consideration for further analysis, because it is does not meet the basic objectives of the project: ~~inconsistent with the existing industrial land use and zoning designation and has been determined infeasible in light of the City Council action regarding authorization of a Cash Pledge Agreement. Approximately 2.6 acres of the property was previously identified for use as a park; however, the City Council determined that establishment of an active use park on the property is inappropriate due to the property's location in an industrial corridor, which could result in negative health impacts of air pollution on sensitive receptors. The City Council accordingly authorized execution of a Cash Pledge Agreement whereby a payment in the amount of $3,573,365 would be made to improve and provide recreational and park facilities in the vicinity of the property (the Report of the Chief Legislative Analyst, Ordinance No. 181949, and City Council Motion are included in Appendix XII).[1,2,3] Development of the property for~~

~~a park or recreational use does not meet the basic objectives of the project to the same extent as the proposed project.~~

~~[1] City of Los Angeles, Report of the Chief Legislative Analyst. 2011.~~

~~[2] City of Los Angeles, Ordinance No. 181949. 24 November 2011.~~

~~[3] City of Los Angeles, City Council Motion. 24 February 2012.~~

- A park or recreational use would not attain the objective of providing a minimum of 480,000 square feet of light industrial space, consistent with the existing land use designation and zoning.

- A park or recreational use would not provide light manufacturing jobs within 3 miles of an existing garment manufacturing labor force in the Southeast Los Angeles Community Plan Area.

- A park or recreational use would not allow for development of an industrial park that is along the Alameda Corridor to take advantage of distribution efficiency opportunities.

- A park or recreational use would not facilitate the ability of existing garment labor force, located in close proximity to the project site to utilize existing public transit system and other multi-modal transportation opportunities in vicinity of proposed project.

- A park or recreational use would not preserve and/or redevelop the industrial sector of the Southeast Los Angeles Community Plan Area to accommodate emerging technologies, thus providing an enhanced employment base for the Community Plan Area's population.

- A park or recreational use would not benefit Southeast Los Angeles Community Plan area population as economic stimulation through employment opportunities, attracting commercial and industrial tenants to the area, and providing tax revenue for the City would not occur.

The proposed use of the property as light manufacturing is consistent with land use planning objectives articulated in the Southeast Los Angeles Community Plan. The City of Los Angeles Southeast Los Angeles Community Plan has designated the project site as light industrial. The land use designation discourages nonindustrial uses and uses that compromise job-producing potential. Plan Goal 3 supports sufficient land for a variety of industrial uses with maximum employment opportunities, which are safe for the environment and the work force, and which have minimal adverse impacts on adjacent uses. The South East Los Angeles Community Plan further supports the retention and redevelopment of the industrial sector through Objective 3-1, Policy 3-1.1, and Objective 3-2, Policy 3-2.1:

Objective 3-1 To provide for existing and future industrial uses which contribute job opportunities for residents and which minimize environmental and visual impacts to the community.

Policies

3-1.1 Designate lands for the continuation of existing industry and development of new industrial parks, research and development uses, light manufacturing, and similar uses which provide employment opportunities.

Objective 3-2 To retain industrial plan designations to maintain the industrial employment base for community residents and to increase it whenever possible.

Policies

3-2.1 The significant, large industrially planned parcels located in predominantly industrial areas associated with the railroad transportation facilities along Alameda and in the Slauson area should be protected from development by other uses which do not support the industrial base of the community, and the City.

The Southeast Los Angeles Community Plan's open space goals and objectives support the preservation of existing open space and the development of new open space, in balance with new development, to serve the recreational, environmental, health and safety needs of the community. The objectives further note that the "Plan Map designates lands for open spaces including parklands." As noted above, the project site is in an industrial corridor adjacent to the Alameda Corridor rail line, and it is not designated for open space on the plan map. The area surrounding the proposed project site is developed almost exclusively with light and heavy industrial uses, with limited small lot single family residential homes intermixed with light/industrial warehouse uses to the south and residential areas farther to the west. The Alameda Corridor rail line is located directly to the east and runs below grade in the project area, and also includes the Southern Pacific Railroad right-of-way across South Alameda Street. The Metro Blue Line light rail is located immediately to the west of the project site. The nearest designated open space is the Ross Snyder Recreation Center, located 0.2 miles west of the proposed project site.

The applicant acknowledges the former interim use of the project site as a community garden that occurred under previous ownership. However, the use was discontinued in 2006, and the project site is currently vacant underutilized land in an industrially zoned area. Appendix XII and Section III.E of the Draft EIR provide details of a 2003 settlement agreement between the prior owner and the City of Los Angeles to dedicate 2.6 acres of the property for maintenance of a park for recreation and park purposes, and subsequent amendment of the agreement to allow the proposed project to be developed. This amendment for the cash pledge provided the City or a nonprofit organization with the funds to dedicate a park in a more appropriate location than the project site, which is industrially zoned and isolated to the west and east by major rail lines. The City Council accordingly determined that establishment of an active use park on the property is inappropriate due to the property's location in an industrial corridor, and authorized execution of a Cash Pledge Agreement whereby a payment in the amount of $3,573,365 was made to improve and provide recreational and park facilities at more suitable alternate sites in the vicinity of the property (see Report of the Chief Legislative Analyst, Ordinance No. 181949, and City Council Motion included in Appendix XII of the Draft EIR). The value of the cash pledge was determined on the basis of the pro rata value of the 2.6 acres to be set aside for recreational purposes pursuant to the settlement agreement relative to the overall purchase price of the project site. The project's cash pledge agreement will contribute to open space in the City in a more suitable location, while the project site would be developed consistent with its Community Plan designation, goals and policies, and the project objectives.

P. VI-5 Table VI-2, Summary of Impacts for Proposed Project and Alternatives, has been revised as follows:

Table VI-2
Summary of Impacts for Proposed Project and Alternatives

	Proposed Project	Alternative A: No Project	Alternative B: Use of Clean Fuel Trucks	Alternative C: Reduced Truck Operations
Air	Mitigation	Fewer	Fewer	Fewer
Cultural	Mitigation	Fewer	Equal	Equal
Greenhouse Gas Emissions	Mitigation	Fewer	Fewer	Fewer
Hazards and Hazardous Materials	Mitigation	Fewer	Equal	Equal
Land Use and Planning	Less Than	Less than	Less than	Less than
Traffic and Transportation	~~Mitigation~~ Significant	Fewer	Equal (Significant)	Fewer (Less than)
Utilities and Service Systems	Mitigation	Fewer	Equal	Equal

Note: Considerations are based upon the overall worst impact of a particular environmental issue area.
Less than—no impact or less than significant.
Mitigation—less than significant after mitigation.
Significant—significant after mitigation.
Fewer / equal / greater— refers to the comparison of the alternatives' impacts to the proposed project's impacts.

P. VI-8 ***Transportation/Traffic***

The No Project Alternative would not have the potential to result in significant impacts to traffic and transportation. The No Project Alternative would not involve any construction, operation, or maintenance activities resulting in additional trip generation. ~~Like the proposed project, t~~This alternative would not result in cumulatively considerable impacts. Since there would be no impacts to transportation/traffic with the No Project Alternative, mitigation measures Traffic-1 through Traffic-5 would not be required.

P. VI-11 ***Transportation/Traffic***

The Use of Clean Fuel Trucks Alternative would have the same construction scenario as the proposed project. As with the proposed project, the project design elements described in Section III of this Draft EIR are sufficient to avoid significant impacts to traffic, pedestrian safety, and operation of alternative modes of travel during construction.

Additionally, the Use of Clean Fuel Trucks Alternative would have the same trip generation as the proposed project. Like the proposed project, the Use of Clean Fuel Trucks Alternative would not be expected to result in significant impacts with regard to traffic and transportation as all of the intersections analyzed in the addendum traffic study with the exception of the intersection of Alameda Street/Washington Boulevard. ~~would continue to operate at level of service (LOS) D or better.~~ Like the proposed project, this alternative would ~~not~~ result in cumulatively considerable impacts. Since the Use of Clean Fuel Trucks Alternative would have the same trip generation as the proposed project, mitigation measures Traffic-1 through Traffic-5 would be required.

P. VI-12

D. REDUCED TRUCK OPERATIONS

Alternative Components

The Reduced Truck Operations Alternative would entail the same elements that are described in the proposed project. As with the proposed project, this alternative would be located on the approximately 13-acre vacant lot located at 4051 South Alameda Street. This alternative would entail the same construction of a new industrial park consisting of four buildings occupying approximately 353,375 ~~365,945~~ square feet of warehouse space, 112,745 ~~85,181~~ square feet of office space, and 14,000 ~~29,896~~ square feet of manufacturing space. The proposed project was determined to result in significant impacts to ~~air quality~~ traffic and transportation requiring the consideration of feasible alternatives capable of achieving most of the basic objectives of the project. Truck trips during the operational phase of the project are the primary contributor to emissions of criteria air pollutants. Additionally, Truck trips during the operational phase of the proposed project will result in significant impacts to the intersection of Alameda Street/Washington Boulevard. Therefore, under this alternative, the applicant has voluntarily recommended reducing maximum allowable truck trips per day, during the operational phase of the project, to 75 trips per day. The empirical data for the applicant's existing operations demonstrates that this is feasible, as the applicant is currently operating at less than 50 truck trips per day.

P. VI-13

Truck trips during the operational phase of the project are the primary contributor to emissions of criteria air pollutants. Unlike the proposed project, the Reduced Truck Operations Alternative would cap the maximum allowable truck trips at 75 trips per day and therefore would not allow for the up to 100 trips during the peak hour, or up to 351 ~~342~~ daily trips, that would be estimated using the *ITE Manual*. Although, there are no significant impacts to air quality from the proposed project, the Reduced Truck Operations Alternative would be expected to reduce emission by at least 25 percent during the a.m. and p.m. peak hours. As with the proposed project, the Reduced Truck Operations Alternative would generate diesel emissions that are below the threshold of significance. The proposed maximum allowed truck trips of 75 per day would further reduce the cancer risk from diesel emissions by the ratio of 75 to 351 ~~342~~, or 79 ~~78~~ percent, and would be much less than 1 percent of evaluation thresholds for cancer risk.

P. VI-14

Truck trips during the operational phase of the project are the primary contributor to emissions of criteria air pollutants. Unlike the proposed project, the Reduced Truck Operations Alternative would cap the maximum allowable truck trips at 75 trips per day and therefore would not allow for the up to 100 trips during the peak hour, or up to 351 ~~342~~ daily trips, that would be estimated using the *ITE Manual*. Therefore, under this alternative, emissions would be further reduced by approximately 25 percent during the peak hour, and a ratio of 75 to 351 ~~342~~, or 79 ~~78~~ percent of a typical 24-hour period or operations.

Pp. VI-14–15

To avoid significant impacts to the intersection of Alameda Street/Washington Boulevard ~~However~~, the Reduced Truck Operations Alternative would reduce the maximum allowable truck trips per day during the operational phase of the project from 351 ~~342~~ to 75 trips per day. ~~Like the proposed project, t~~The Reduced Truck Operations Alternative would not be expected to result in significant impacts with regard to traffic and transportation as all of the intersections analyzed in the addendum traffic study would continue to operate at level of service (LOS) D or better. ~~Like the proposed project, t~~ This

alternative would not result in cumulatively considerable impacts. However, the Reduced Truck Operations Alternative would reduce trips and vehicle miles travelled by a ratio of 351 ~~342~~ to 75, or an approximately 79 ~~78~~ percent reduction. Although the Reduced Truck Operations Alternative would reduce trip generation, mitigation measures Traffic-1 through Traffic 5 would still be required.

Appendix II
Notice of Preparation Comment Letters

Appendix II, *Notice of Preparation Comment Letters*, has been revised to include letters from the following NOP commenters:

- Bruce Campbell
- Paul Esparza-Andalon
- Michael Flood
- Jack Neff
- Ernesto Nevarez
- Devon G Pena
- Linda Piera-Avila
- Leslie Radford
- Mr. Tezomozoc
- Gillian Ware

These letters are attached following this page.

From:	Srimal Hewawitharana
To:	Eric Charlton
Subject:	Fwd: Case No. ENV-2012-920-EIR, AA-2012-919, DIR-2013-887-SPR/ Proposed Construction of Four Industrial Buildings
Date:	Wednesday, July 09, 2014 1:34:59 PM

---------- Forwarded message ----------
From: **Bruce Campbell** <madroneweb@aol.com>
Date: Wed, Jul 9, 2014 at 11:01 AM
Subject: Re: Case No. ENV-2012-920-EIR, AA-2012-919, DIR-2013-887-SPR/ Proposed Construction of Four Industrial Buildings
To: srimal.hewawitharana@lacity.org

July 8, 2014

Bruce Campbell

3520 Overland Ave. # A 149

Los Angeles, CA 90034

Srimal Hewawitharana
Environmental Specialist II
Department of City Planning
200 N. Main St. 7th Floor
Los Angeles, CA 90012
Via email: srimal.hewawitharana@lacity.org

Re: Case No. ENV-2012-920-EIR, AA-2012-919, DIR-2013-887-SPR/ Proposed Construction of Four Industrial Buildings

Dear Ms. Hewawitharana, Planning Dept., and to whom it may concern:

These are my scoping comments on Re: Case No. ENV-2012-920-EIR, AA-2012-919, DIR-2013-887-SPR/ Proposed Construction of Four Industrial Buildings -- also filed on behalf of the South Central Farmers Support Committee pertaining to the 4051 South Alameda Street Project.

I want to make a few initial crucial points:

1. I note (on a door on the 7th floor of L.A. City Hall) that the 41st and Alameda proposed project has been moved to the **"Major Projects"** part of the Planning Department.

2. I find it ironic that the project is apparently "major" enough to require an EIR, is "major" enough to be moved to that part of the Planning Dept., and yet it has been **declared that the proposed project is not of regional significance** and thus there are no plans for an in-person public meeting in which the public can comment on what the scope of the study should be.

3. Either in the EIR, or preferably as a prelude to scoping, **the public deserves to have the knowledge of exactly who was "the grand decision-maker" who apparently decided that this neighborhood wherein a major project** is proposed (involving polluting vehicles in a hard-to-access area in the already excessively-polluted Alameda Corridor region) **was not deserving of public scoping hearing.** (Please, either have someone admit to it, or we may pursue other methods to gather documents which expose the trail of who was involved. **Was the District # 9 Councilmember's office, someone with the Mayor's office, and/or the applicant or his people involved with convincing the "grand decision-maker" to make sure to avoid a public scoping hearing since there allegedly was no regional significance?**)

4. **I consider the "current project" documentation to be invalid.** Not only must there be **a public scoping meeting** to discuss the regional impacts of the proposed project, but when **there are continued blatant lies in regards to such things as how wide streets are** in the vicinity and **whether homes exist south of 41st Street and east of Long Beach Ave.**, why should be believe things like sampling for toxic materials and believing the number of theorized vehicle trips per day relating to the project(?)

****

I call for admission as to **who pressured whom, and who made the decision to avoid a public scoping hearing on the regional significance of the PIMA project.**

Then, **have two humans bring a tape measure and measure the streets that surround the 41st and Alameda site. Record correct info, and replace bogus numbers in documents such as under "Environmental Setting" on page 7 of 581 with the correct numbers.** (I am no lawyer, but I believe that many courtrooms like relative truth rather than easily-disproved lies, so change the street measurements if you want to retain any credibility.)

I want to point out that another major problem with the **"Environmental Setting"** portion is that **it pretends that there are no residences south of 41st Street and east of Long**

Beach Ave. Please cease having Planning Dept. officials swallow whatever developers and often their Council lackeys tell them! You can go to the area and look for homes (which you will find) -- you can even bring a tape measure to do two tasks at once!!

It is my understanding that, though comments on earlier variations of the project are in "the file", that those comments will not count toward scoping comments on the current project. Though I will try to get important points in the record again, **but why should an old case number and the applicant's earlier info still be valid, and yet the comments on such a case number apparently will not count unless re-submitted?** *(Please point to a legal regulation which says that applicants can keep documents in the record, while also saying that comments on such documents would not formally be considered in the record to challenge the newer project.)*

****

I note that **"Environmental Settings"** has changed from the earlier document. Taking my advice, Alameda Street was declared to be east rather than south of the site -- plus 41st Place was changed to 41st Street as I had pointed out. **WHAT ABOUT BOGUS ESTIMATES / MEASUREMENTS OF THE ADJACENT STREETS to the 41st and Alameda site?? Those remain not only very suspect, but BLATANTLY INACCURATE!**

A few of us mentioned large trucks in earlier comments. **The EIR must be very clear as to exactly what kind of trucks will be able to access which streets and which driveways in the area of the 41st and Alameda St. site. Will the trucks with 53 foot trailers and large sleeper cabs be able to access the area -- by which streets and to which driveways?** If not, explicitly mention in the EIR that no trucks with 53 foot trailers and sleeper cabs will be forbidden to enter the area. Even some other trucks will have a hard time with Long Beach Ave. and other streets and driveways in the area.

Please examine Sarah Nolan's concerns about lined up traffic waiting to turn in their scrap metal (when considering how accessible certain roads would be when giant trucks are seeking to travel on narrow roads), as well as the Food Bank's concern that there still be parking on both sides of 41st Street.

It is also odd that the documentation omits the **inescapable fact that the Metrorail Blue Line runs on some tracks adjacent to the Pacific Railroad's tracks and crosses the fairly busy 41st Street.** So, the fantasyland of this development proposal envisions wide roads, disappearing residences, and a seemingly vanished light-rail line. That is simply not the reality of this site. (I hope to have included in the record some of **Metro's earlier concerns about the proposed project's impact on safety in the 41st Street and Long Beach Avenue area.**)

The latest "Environmental Setting" says that the site is level. While it is fairly level, yet a map in the record notes that it is a few feet higher at northeastern end than it is at the southwestern end of the property.

Also, I realize that not only was there a concerted effort made to pretend that there are no residences south of 41st St. and east of Long Beach Ave., but **they even have the nerve to pretend that the fairly densely populated neighborhood to the west of Long Beach Ave. is mere warehouse / industrial.** Basically, after going about a block west of Long Beach Ave. on 41st Ave., then it is predominately a residential area, and quite a populated one at that. **Thus, do not pretend there are not a bunch of "sensitive receptors" in the immediate as well as greater vicinity of the 41st and Alameda site.**

I will now peer at the map in the record and mention some key parcels in the general area which could be considered "sensitive receptors" or otherwise contributing to safety concerns in the region. **Glancing at page 27 of 781, the Snyder Recreation Center would be the closest site which would have a number of sensitive receptor people (unless one counts individuals with asthma, other ailments, or a baby or elder in closerby residences) I note that the nearest school is Nevin Ave. School -- followed closely by Jefferson High School, then the Roberts Recreation Center, the Ascot Avenue School, and the Holmes Ave. School. Carefully evaluate the likely impacts of added air pollutants on the sensitive receptors at each school and recreation site mentioned above.**

Increased diesel emissions, increased congestion, inadequate street size, and other aspects relating to the project will certainly add to the already excessive toxic burden which the Alameda - Central community carries at the aforementioned schools and recreation centers, as well as otherwise. While I personally have not surveyed the neighborhood for nursing / retirement homes, or for places for medical or psychiatric care, please identify such facilities in the EIR if they are within 3/4 of a mile of the 41st and Alameda site.

With the increased congestion on all 4 surrounding streets, as well as the proposed surge in vehicle journeys associated with the project, **this increase in emissions which clearly has an impact on many sensitive receptors must be carefully analyzed in the EIR.** In addition, **these emissions, plus the impact on health and safety of sensitive receptors** in the neighborhood, must also be carefully analyzed in **an Environmental Justice context.**

****

IMPORTANT SUBSTANCES FOR WHICH TO TEST:

I find 14 samples at 5 foot depth, with perhaps two at a 15-foot depth as part of a soil vapor

probe, to be an inadequate characterization of this heavily abused site for toxic materials.

I call for a thorough assessment of hazards and hazardous materials to be included in the EIR. **Such thorough testing would involve numerous sampling sites within each acre within the 41st and Alameda site.** A mere one sample per acre is certainly inadequate if one is concerned about health and safety. I am not an expert on sampling, but the more the better, and taking samples at differing depths could bring useful information forward.

The toxic materials which must be tested for (in the EIR) include: Total Petroleum Hydrocarbons (TPH), VOCs, SVOCs, CCR Title 22 metals, organochlorine pesticides, PCBs, pentachlorophenol, creosote, formaldehyde, xylene, benzene, toluene, 2,4-D , DDT / DDE, glyphosate, atrazine, ARSENIC, lead, fluoride, HEXAVALENT CHROMIUM, cadmium, chromium, chromium-6, chromium-12, perchlorate, TCE, Tetrachloroethene, PCE, diesel constituents and breakdown products, as well as for substances one might find from a color and dye company and from a dry-cleaning company once on the site.

In addition, test for these components and/or breakdown products of diesel. I note that **Table 1: Substances in Diesel Exhaust Listed by Cal EPA as Toxic Air Contaminants mentions these:** acetaldehyde; acrolein; aniline; antimony compounds; arsenic; benzene; beryllium compounds; biphenyl; bis[2-ehtylhexyl)phthalate; 1,3-butadiene; cadmium; chlorine; chlorobenzene; chromium compounds; cobalt compounds; creosol isomers; cyanide compounds; dibutylphthalate; dioxins and dibenzofurans; ethyl benzene; formaldehyde; inorganic lead; manganese compounds; mercury compounds; methanol; mehtyl ethyl ketone; naphthalene; nickel; 4-nitrobiphenyl; phenol; phosphorus; polycyclic organic matter, including polycyclic aromatic hydrocarbons (PAHs) and their derivatives; propionaldehyde; selenium compounds; styrene; toluene; xylene isomers and mixtures; o-sylenes; m-xylenes; and p-xylenes. Please test for some of these components of diesel emissions in soil at various sites throughout the approximately 14 acres.

Some review of the earlier documentation indicated that certain substances were found at levels of concern.

Seeing that an AQMD official or staffer advised that the earlier incarnation of this proposed development be mitigated by having a ramp for traffic to travel all the way from the 41st and Alameda site up to the Santa Monica Freeway, does it sound like the AQMD considers this fairly similar development (except on even more of the site) of regional significance?

****

Let me quote three paragraphs which are the third to fifth paragraphs under "Background"

which is beneath "1. Introduction". The third paragraph reads: "At least five phases of environmental soil investigation has been conducted on the Property with testing for total petroleum hydrocarbons TPH), volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), metals, hexavalent chromium, organochlorine pesticides, polychlorinated biphenyls (PCBs) and herbicides. No significant concentrations were detected for most of these chemicals of potential concern.

However, elevated concentrations of certain metals were detected in a limited number of samples, but in no discernable pattern. A limited risk assessment addressed the 'elevated' arsenic concentrations and concluded that the risk from arsenic did not require remediation or mitigation *measures beyond what would normally be appropriate for construction sites.* **It has been further concluded that additional characterization of the soil for metals may be warranted if the Property were to be used for residential purposes, or soils were to be removed from the Property.**

In addition, low concentrations of VOCs were identified in scattered soil samples in earlier investigations. No soil vapor assessment has been conducted on the Property to date. Consequently, it is not clear whether these VOC detections resulted from small release incidents or are indicative of a wider, more significant problem. **A comprehensive Property-wide soil vapor assessment was recommended.**"

Let us re-examine the earlier sentence (3 paragraphs up) that says: "No significant concentrations were detected for most of these chemicals of potential concern." This is an unusual way of saying the site is doing alright in regards to its contamination by "most" chemicals, but **it does not state clearly which precise substances were tested that were found beyond regulatory levels.**

Are all the substances that exceeded regulatory levels mentioned in the first paragraph (immediately below the line of asterisks) or in the following paragraph (arsenic and perhaps other metals)? **Please clearly state which toxic materials were found at the site which exceeded the "usual" regulatory level. Please also make another distinction -- that would be how many (and identify) the toxic materials that would need remediation if the site was to host residences (or if soil was to be removed from the site).** There are repeated references (especially by SCS Engineers reports) that a number of toxic materials are too high if the area was to be residential, but **apparently a fairly high toxic material level is acceptable if a site is merely a "construction" or "industrial" site.** Is part of this logic that people may well spend over half their 24-hour day at their residence, but spend closer to 8 or 9 hours at their workplace? However, sweat-shops are known for long hours. Should hours of a worker at the 41st and Alameda site be limited so that they do not receive excessive exposure from toxic materials lurking in the soil? Please explain. **Also explain how much soil would need to be "removed" from the site in order to trigger a more thorough investigation and remediation of such toxic substances. Are there plans for the removal of any soil from the 41st and Alameda site? Explain…**

I will now quote the "5 REGULATORY LIMITS" portion of the March 2011 soil vapor study by SCS Engineers: "The California EPA Office of Environmental Health Hazard Assessment (OEHHA) published the *Human-Exposure-Based Screening Numbers Developed to Aid Estimation of Cleanup Costs for Contaminated Soil*, dated November 2004, revised January 2005. Within this document, California Human Health Screening Levels, or CHHSLs, were developed for certain VOCs in soil gas at 5 feet below buildings for vapor intrusion into structures under residential and industrial / commercial land use scenarios. The CHHSLs are based on general assumptions regarding soils and buildings at VOC-impacted sites, the chemical characteristics of various VOCs, and potential health risks. **The OEHHA guidance states that CHHSLs are 'useful to get a general understanding of potential problems with a site, but cannot be used to assess actual health risks.' Further, OEHHA has stated that CHHSLs have 'no regulatory effect, and have been published solely as a reference value** that may be used by citizen groups, community organizations, property owners, developers, and local government officials to estimate the degree of effort that may be necessary to remediate a property.'

The VOCs detected in vapor samples collected from the Property may be compared to the CHHSLs (if any) listed at the bottom of Table 1. Of the samples collected at 5 feet bgs, two contained PCE (SV2-5' and SV6-5') above its commercial/industrial CHHSL of 0.603 ug/L. The remaining concentrations of PCE and other VOCs were below theoir respective commercial/industrial CHHSLs, if any."

First, explain PCE once more. One of the documents calls Tetrachloroethene "PCE", even though it seems like PCE would have penta or a per (rather than tetra) beginning the chemical name. But then I notice in the June 2013 SCS document that says PCE is actually "perchloroethene." Please alleviate any confusion regarding this alphabet soup matter.

It sounds like the CHHSLs is a basic reference which cannot be relied upon to properly assess health risks (whether it be for residential, construction, or industrial / commercial property). Would not the "precautionary principle" dictate that there needs to be a "real" health assessment with a firmer testing and remediation regimen, rather than some toothless general references? Are sweatshop workers, truckers, and construction workers expendable, or can they handle a higher toxic load? Explain thoroughly in the EIR.

It is vital to point out (as it was in the last paragraph under "6 SUMMARY AND FINDINGS") that **"there has been no regulatory involvement or oversight of the investigations to date."** Later in that paragraph from a SCS report, it says that "There is a **possibility that regulatory agencies**, upon review of this report, **would require further investigation to confirm findings of this investigation and the vertical extent of VOCs in the soil.** In addition, if the Property is to be developed for residential use, additional investigation or a health risk assessment may be warranted."

If a formal "health risk assessment" was undertaken, would that follow certain guidelines set forth by certain agencies? It also appears that one of the further investigations (and related sampling) needed pertain to the need for sampling at varying depths in order to gauge the vertical extent of VOCs in the soil.

I want to point out some "Data Gaps" which were admitted on pages v and vi of the SCS Engineers' June 2013 Phase I Environmental Assessment. Gaps are admitted in "individual parcel histories", and it is admitted that: **"In light of the industrial usage of much of the Property, this is a potentially significant data gap."** It is furthermore pointed out that much of the industrial activity on this site existed when there was little or no regulatory oversight of toxic materials. "Consequently, **there are no records of hazardous material use or management. This is a potentially significant data gap."**

Since there are admitted data gaps and uncertainties regarding extent of contamination, let us choose the side of caution and do thorough sampling for the substances which I have already mentioned in this scoping comment. The **Alameda / Central neighborhood is already essentially a "sacrifice area".** -- note that there is no admission in the record that there are actual residents in the neighborhood (either the quite immediate area to the south of 41st St. and east of Long Beach Ave.), but even no admission that residents exist in the quite populated area west of Long Beach Ave.

As an indication **that the Alameda / Central neighborhood is essentially a "sacrifice area"**, I note that there are **11 hazardous waste sites** (called US EPAHazardous Waste Generators) **within a quarter mile of the 41st and Alameda site** (see page 18 of SCS June 2013 report). This shows that the neighborhood is already overburdened with toxic materials and industry -- **this must be part of a thorough Environmental Justice analysis on the proposed project.**

The CUMULATIVE IMPACT of all the historic hazardous materials activities on the 41st and Alameda site, continued exposure to such materials on-site, combined with excessive air pollutants from industry in the region (including the nearby hazardous waste generators as well as the Exide battery facility in Vernon), combined with pollutants from nearby freeways and streets as well as from LAX-related air traffic (including the associated "fine particulates") combined with likely emissions from the project (in construction and operational phases) all need to be carefully evaluated.

By the way, **what model will be used to predict emissions from construction activities on the 41st and Alameda site? How will NOX and "black carbon" be regulated as far as construction emissions at the site?** Also, **identify the VOC content of paint** which may be used at this site. In regards to traffic, **we need more detail on what trip generation**

assumptions are used to generate operational emissions from the project. As far as facility operation, will there be regulations pertaining to idling time for diesel trucks, or will cleaner trucks be considered since this area is already overburdened with toxic materials?

Apparently, mere sweatshop workers, groundskeepers, and truck-drivers do not deserve a level of remediation of the site that one would expect (and which may be legally mandated) if a residence or residences were planned on the property.

Lastly, I will mention that more things should have been checked on the checklist as applicable to this project -- though I mentioned it in earlier comments which will be scanned and sent in, so I will leave it be for now.

Keep me updated on any public scoping hearing, and in regards to all other aspects of the proposed development on the 41st and Alameda site -- now increasingly called the 4051 South Alameda Street Project.

Thank you for your consideration of this input and guidance.

Sincerely yours,

Bruce Campbell

From: Srimal Hewawitharana
To: Eric Charlton
Subject: Fwd: street widths for 41st and Alameda project
Date: Wednesday, July 09, 2014 9:45:23 AM

---------- Forwarded message ----------
From: **Bruce Campbell** <madroneweb@aol.com>
Date: Tue, Jul 8, 2014 at 3:02 PM
Subject: street widths for 41st and Alameda project
To: srimal.hewawitharana@lacity.org

Hi there Srimal,

Bruce Campbell here (who was getting some copies the other day).

I noticed, not very long after there were mentions of alleged street widths on the main documentation on page seven, that you signed your name on a line on page eight.

Anyway, the alleged street widths are WAY OFF. I took a tape measure to the area 13 months ago, and streets around there are claimed to be twice as wide as they are in some cases. I realize these bogus estimates occurred before you signed your name to such documents, but if I were you, I would refuse to sign documents that are outright fabrications. How can we trust sampling of toxic material if the easily measurable width of streets is an outright lie?!

If you are interested in weeding out inaccuracies, then find out who is beholden to developers to claim that the streets are twice as wide as they actually are? Were these so-called estimates made by the applicant, or was some LA City Planning person preceding the current batch at City Planning responsible for such blatant errors?

I would hope that a court of law would care about such blatant inaccuracies -- even if it may not raise many eyebrows at the planning department.

Have a nice week, Bruce Campbell

From: Srimal Hewawitharana
To: Eric Charlton
Subject: Fwd: South Central Farm
Date: Wednesday, July 09, 2014 9:47:27 AM

---------- Forwarded message ----------
From: **Paul Esparza-Andalon** <paul.esparza.andalon@gmail.com>
Date: Tue, Jul 8, 2014 at 3:11 PM
Subject: Fwd: South Central Farm
To: srimal.hewawitharana@lacity.org

To: hewawitharana@lacity.org

Srimal Hewawitharana
Environmental Specialist II
Department of City Planning
200 N. Main St. 7th Floor
Los Angeles, CA 90012
Via email: srimal.hewawitharana@lacity.org

Re: Case No. ENV-2012-920-EIR, AA-2012-919, DIR-2013-887-SPR/ Proposed Construction of Four Industrial Buildings

Dear Ms. Hewawitharana:

These comments are a call for an immediate rejection of the City's planners' present determination that this proposed project is not regional in scope and for immediately public comment scoping hearing under CEQA prior to evaluation of the applicant's EIR request.

Because the land at issue in the Proposed EIR, which is now open space and without current improvements, lies within and is adjacent to environmental, community, cultural and public transportation resources providing output on a daily basis, the applicant must face the highest level of scrutiny, which is a public scoping hearing to determine the extent to which the Proposed Project impedes, removes and replaces these current valuable resources.

The applicant and its' predecessor attempts at development on this site, have all be been subject to public and backroom inter-agency controversies.

A large community has established an existing pattern of usage of housing, employment, education, transportation and residential development.

The Proposed Project's issues of cummulative air quality impacts has a measureable affect on sensitive receptors. The LA County Dept. of Public Health has identified the impacts which exceed legal limits. By the metric of public health, this project is regional in scope, and impacts spread far beyond the boundaries of the Proposed Project.

The developer's proposed EIR must be put on hold and City Planning must schedule scoping hearings to hear out the opposition to this project from those affected by those inter-agency controversies.

In the strongest decent language possible, reject the applicants request for EIR review and comments and move to calendar a public scoping comments hearing to gather and evaluate data on the Proposed Project's ultimate cummulative impacts on housing, education, employment, transportation, and air quality, residential noise.

For City Planning to move toward a full Environmental Impact Report with an Environmental Justice Analysis is inadequate because of the widespread controversies between agencies, the public controversies over escalating pollution, and the need to answer to people adjacent to the Proposed Project to in the area of Martin Luther King Jr. Boulevard and Long Beach Avenue East, Los Angeles, California 90058.

The land upon which the Proposed Project sits should not be improved to any extent.

No development on the site of the South Central Farm shall be allowed, and the facts support my assertion.

Executive Summary

The owner/developer application EIR proposal is inadequate on several grounds: Scale of Project, Appropriateness of the Project, Realisticness of the Project, Owner/Developer Credibility and Legality of the Project.

Scale of [Proposed] Project is so large, and the impacts and take-aways would place additional stressors on a community adjacent to close to 14 contiguous acres of land in a highly dense, highly urbanized community within the 9th Council District.

The owner/developer is demanding the City provide multiple boundary-level easements, lot-line adjustments, waivers for sidewalk set backs and vacations of City land in an effort to unify the 15 separate parcels purchased by the owner/developer in 2012. The Revised and Recirculated Notice of Preparation Environmental Impact Report is an inappropriate avenue for the [Proposed] Project as the owner/developer's application requests waivers for height limit restrictions, calls for more than 400 parking spaces and for more than 2,000 daily truck trips of indeterminate tonnage, which has a regional significance /far beyond the intended scope or purpose of an EIR and will have a harmful impact on the surrounding community, which is already a Los Angeles injunction-subject toxic hot-spot of unrelenting oppression.

An EIR also ignores the City Planners who made a self-determination the applicant's Proposed Project has no regional impacts. It is unrealistic as the owner/developer's demands from the City for boundary-level lot-line adjustments, etc. have a disproportionate impact on the surrounding community of businesses, mass transit riders, schools, recreation center users and homes. These impacted parties are entitled to a full scoping review and not the rubber-stamping of a hasty, rock-bottom EIR. The owner/developer's credibility has come into question as differences

are apparent between the language of the EIR application and the statements of the owner/developer's representatives. A mixed message has been put out regarding the exact number of buildings the owner/developer plans to build and the number of new living-wage jobs created by the construction of the [Proposed] Project. There are also factual inaccuracies in the owner/developer's EIR application as to the actual width of City streets Long Beach Boulevard East and 41st Street which are to the benefit of the owner/developer. These factual inaccuracies might also be based on a presumption the City will approve mergers of City land on the Proposed Project site, but in any event these choices increase significantly the complexity of the [Proposed] Project and the foreseeable impact it will have.

Lastly, cumulative industrial pollutants in the air, soil and groundwater which have daily impacted this community for years are already under several court and administrative orders arising from actions initiated by state and federal agencies. The application for an EIR to cover the additional industrial pollutants arising from [Proposed] Project raises more questions about regional impact than can be addressed with an EIR with Environmental Justice Analysis under CEQA. The EIR as proposed is legally insufficient to correct these cumulative pollution impacts and the current orders, rulings and laws presently in force in and along the Alamdeda Corridor are for the purpose of correcting the damage already done. In total, City Planning is ready to address the applicant's many requests of the City, but the [Proposed] Project offers insignificant mitigation, which is legally insufficient unless and until public scoping comments are heard at an open hearing under CEQA and the Brown Act.

Background

This comment is opposed to City Planning's attempt to by-pass a public scoping comments hearings, and believes there are many good reasons, any one of which is adequate, to demand a full, open, transparent hearing for the purpose of determining the cummulative impacts of the Proposed Project.

The most recent use of the [Proposed] Project site was agricultural. California agriculture pre-dates California written history, meaning the Mexican and Central-American Seed Bank which was taken and destroyed on or about June 13, 2006 at the Project site was a living link to California pre-history among the Mezo-American ancestors of today's indigenous Americans. The presence of the Seed Bank at the Project site is documented with historical facts surrounding the police action to eject the South-Central Farmers. The Project site is a place where the historical record is not yet closed.

Many species of plants and animals lived at the Seed Bank, now the entirety of the [Proposed] Project Site. The habitats for the plants and animals were destroyed along with the Seed Bank on June 13, 2006 in an action by the LAPD and subsequent bulldozing. Habitat recovery permitting the plant and animal growth since June 13, 2006 has been made impossible with continual disking by a tractor on the grounds of the Project site.

Plant habitats once lost are difficult to restore and the [Proposed] Project is solely in the City's interests in growth, which as planned under the owner/developer's MND application, guarantees that no plant growth could ever return to the habitat lost June 13, 2006.

A guava tree was known to be growing prior to the most recent disking, although at present the guava tree's whereabouts are uncertain. Native birds and resident small mammals, possibly including a bat, as well as common and beneficial insects also had a documented presence.

The Planning Department's Standard of Review

In determining whether an effect will be adverse or beneficial, the City shall consider the views held by members of the public in all areas affected as expressed in the whole record before the lead agency. Before requiring the preparation of an EIR, the City must still determine whether environmental change itself might be substantial, and if so, holding a public hearing for public comments about the impact of the Proposed Project.

In evaluating the significance of the environmental effect of a project, the City shall consider direct physical changes in the environment which may be caused by the project and reasonably foreseeable indirect physical changes in the environment which may be caused by the project.

A direct physical change in the environment is a physical change in the environment which is caused by and immediately related to the project. An examples of direct physical changes in the environment are the dust, noise, and traffic of heavy equipment that would result from construction of a new sewage treatment plant and possible odors from operation of the plant.

An indirect physical change in the environment is a physical change in the environment which is not immediately related to the project, but which is caused indirectly by the project. If a direct physical change in the environment in turn causes another change in the environment, then the other change is an indirect physical change in the environment. For example, the construction of a new sewage treatment plant may facilitate population growth in the service area due to the increase in sewage treatment capacity, but may then lead to an increase in air pollution as a result from population growth in the new sewage treatment service area.

Economic or social changes may be used to determine that a physical change shall be regarded as a significant effect on the environment. Where a physical change is caused by economic or social effects of a project, the physical change may be regarded as a significant effect in the same manner as any other physical change resulting from the project. Alternatively, economic and social effects of a physical change may be used to determine that the physical change is a significant effect on the environment. If the physical change causes adverse economic or social effects on people, those adverse effects may be used as a factor in determining whether the physical change is significant. For example, if a project would cause overcrowding of a public facility (like a toilet) and the overcrowding causes an adverse effect on people, the overcrowding would be regarded as a significant effect.

The owner/developer’s EIR Application Will Convert Unique Farmland of Statewide Importance.

The City of Los Angeles and L.A. City's Port Authority recognized the Project site as farmland since they issued "Permit 94" to further certify the earlier agreement to allow an agricultural focus at this site. Permit 94 has never been altered, thus there

is a map that this area was permitted to be agricultural land. Until June 13, 2006, the site was likely the most unique farm of any size in the USA and may well have been the most biologically diverse due to the wide range of traditional food and medicinal crops being grown including crops grown from rare heirloom seeds from Latin America. Endangered species such as the Red-tailed hawk were photographed on the site prior to June 13, 2006.

At this time, I have no confirmation that Los Angeles Unified School District ("LAUSD") was informed about the [Proposed] Project before the Department of City Planning's June 13, 2013 hearing. I am aware of no comments back from LAUSD. LAUSD is entrusted with the health of its students, teachers and staff, and an absence of comment from such an interested party as LAUSD does imply the District has not yet prepared a comment, given the vast reach of the Project. As this comment will show, LAUSD and others will be impacted by the City's planned growth, so widespread is the human and species habitat impact of the Project.

The explanation for caution and a scoping hearing for public comments is that the [Proposed] Project is designed to only remain for a definite number of years. Once built, everything on the [Proposed] Project site will be lost with no hope of recovery. What came before on the [Proposed] Project was a Seed Bank, which held the agricultural and horticultural genetic transmissions from Mexico and Central-America. The Project is on a site where many thousands of persons in the neighborhood are forced each day to compete with the [Proposed] Project for water, air, shelter and sustenance. The Vernon Avenue Blue Line Station averages 5,200 passengers each day, with over 250,000 passengers riding the Blue Line annually. Traffic patterns account for over 10,000 car trips a day through the area, and the surrounding community consists of a public recreation center (The Arthur K. Snyder City Recreation Center) and an LAUSD high school, Jefferson High. Pedestrian traffic is constant throughout every day as bus and the Blue Line bring persons into the region for jobs, school, and recreation.

The determination of whether a project may have a significant effect on the environment calls for careful judgment on the part of the City, based to the extent possible on scientific and factual data. An ironclad definition of significant effect is not always possible because the significance of an activity may vary with the setting. For example, an activity which may not be significant in an urban area may be significant in a rural area. In this situation where having a truck depot may not have significant effect in the middle of a pasture, in the middle of an occupied City, the Project represents a degradation of the environment, threatening human health and the Project site with an irrevocable commitment of resources.

The upcoming Department of City Planning ruling on the applicant's EIR is premature because it does not address that City Planning planners made a determination the Proposed Project is not regional in scope. If the owner's disclosures to the Department of City Planning or the Zoning Administrator lacks adequate credibility, the Department of City Planning must first hold a scoping hearing for public comments before evaluating the applicant's EIR.

Owner's 2008 Application for MND

The applicant's presentation included drawings of a series of 46 foot-high buildings.

The overly tall buildings will prevent existing light and air from reaching the land and community, eliminating a vital resource necessary for persons on the ground.

The environmental documentation indicates that the applicant's proposal would generate an additional 2,581 truck trips a day, which is a region-wide impact on traffic, air and noise pollution and on a wide-range of sensitive receptors.
We must continue to fight
We ask that you continue to support this 18 year struggle. We have been fighting for green space in our city since 1992.

Aqui Estamos Y No Nos Vamos

Paul Esparza-Andalon
323-5711514

LOS ANGELES REGIONAL

FOOD BANK

Fighting Hunger. Giving Hope.

July 17, 2014

Ms. Srimal Hewawitharana
Environmental Specialist II
City of Los Angeles Planning Department
200 N Spring Street, Room 750
Los Angeles, CA 90012

Re: 4051 S. Alameda Street Project – Notice of Environmental Impact Report

Dear Ms. Hewawitharana:

The Los Angeles Regional Food Bank is a nonprofit organization located at 1734 East 41st Street, across the street from the proposed 4051 S. Alameda Street building project. We have been at our location since 1989, and we operate a distribution center to collect and distribute food to other charitable agencies serving communities throughout the City and County of Los Angeles. Last year, we distributed 60 million pounds of food (the equivalent of $65.7 million) through the agencies that we serve and Food Bank programs. We are very concerned about any project that may impact the operations of the Food Bank and our ability to serve residents of the City of Los Angeles.

Our main concern with the project is the potential impact on traffic on the streets around the 4051 S. Alameda Street building project, specifically on East 41st Street between Alameda and Long Beach. Since we are located at 1734 East 41st Street, our trucks and vehicles, agency trucks, and the vehicles of staff, volunteers and the visitors access our facility from this main entrance.

Regarding the current plans for the 4051 S. Alameda Street building project, we are concerned with:

1) Traffic flow on East 41st Street. There are no vehicle entrances/exits on Alameda or Long Beach Blvd so all traffic will spill on to East 41st Street on the south side of the proposed project. East 41st Street is already a very congested street and is only two lanes, so the proposed project will have a major impact on the Food Bank and others utilizing East 41st Street. It doesn't make sense why there are no vehicle entrances/exits on Alameda or Long Beach Blvd. At the very least, an additional traffic lane needs to be created on East 41st Street.

2) Building coverage and adequate parking - The proposed four buildings' coverage is very high and may lead to other issues related to the proposed project.

In addition, this is not just any parcel proposed for development, this is the Old Lancer site that turned into a community garden/urban farm and has a rich history. Community residents came out in force for the hearing on June 5 at City Hall and should be engaged and heard from regarding this project.

Please contact me at (323) 234-3030 ext. 148 if I can provide any other information.

Sincerely,

Michael Flood
President/CEO

cc: Councilmember Curren Price, CD-9

From: Srimal Hewawitharana
To: Eric Charlton
Subject: Fwd: e: Case No. ENV-2012-920-EIR, AA-2012-919, DIR-2013-887-SPR
Date: Friday, July 18, 2014 1:32:07 PM

---------- Forwarded message ----------
From: **Jack Neff** <jackneff01@yahoo.com>
Date: Thu, Jul 17, 2014 at 11:18 PM
Subject: e: Case No. ENV-2012-920-EIR, AA-2012-919, DIR-2013-887-SPR
To: "srimal.hewawitharana@lacity.org" <srimal.hewawitharana@lacity.org>
Cc: Andy Shrader <andshr@gmail.com>, Council Member Koretz <paul.koretz@lacity.org>

July 17, 2014

Srimal Hewawitharana
Environmental Specialist II
Department of City Planning
200 N. Main St. 7th Floor
Los Angeles, CA 90012
Via email: srimal.hewawitharana@lacity.org

Re: Case No. ENV-2012-920-EIR, AA-2012-919, DIR-2013-887-SPR/ Proposed Construction of Four Industrial Buildings

Dear Ms. Hewawitharana:

These comments are a call for an immediate rejection of the City's planners' present determination that this proposed project is not regional in scope.

Because the land at issue in the Proposed EIR, which is now open space and without current improvements, lies within and is adjacent to environmental, community, cultural and public transportation resources providing output on a daily basis, the applicant must face the highest level of scrutiny, which is a public scoping hearing to determine the extent to which the Proposed Project impedes, removes and replaces these current valuable resources.

The applicant and its' predecessor attempts at development on this site, have all be been subject to public and backroom inter-agency controversies.

A large community has established an existing pattern of usage of housing, employment, education, transportation and residential development.

The Proposed Project's issues of cummulative air quality impacts has a measureable affect on sensitive receptors. The LA County Dept. of Public Health has identified the impacts which exceed legal limits. By the metric of public health, this project is

regional in scope, and impacts spread far beyond the boundaries of the Proposed Project.

The developer's proposed EIR must be put on hold and City Planning must schedule scoping hearings to hear out the opposition to this project from those affected by those inter-agency controversies.

In the strongest decent language possible, reject the applicants request for EIR review and comments and move to calendar a public scoping comments hearing to gather and evaluate data on the Proposed Project's ultimate cummulative impacts on housing, education, employment, transportation, and air quality, residential noise.

For City Planning to move toward a full Environmental Impact Report with an Environmental Justice Analysis is inadequate because of the widespread controversies between agencies, the public controversies over escalating pollution, and the need to answer to people adjacent to the Proposed Project to in the area of Martin Luther King Jr. Boulevard and Long Beach Avenue East, Los Angeles, California 90058.

The land upon which the Proposed Project sits should not be improved to any extent.

No development on the site of the South Central Farm shall be allowed, and the facts support my assertion.

Executive Summary

Despite City Planning non-disclosure of the criteria used to determine whether the Proposed Project is regional in scope, the owner/developer application EIR proposal is also inadequate on several grounds: Scale of Project, Appropriateness of the Project, Realisticness of the Project, Owner/Developer Credibility and Legality of the Project.

Scale of [Proposed] Project is so large, and the impacts and take-aways would place additional stressors on a community adjacent to close to 14 contiguous acres of land in a highly dense, highly urbanized community within the 9th Council District.

The owner/developer is demanding the City provide multiple boundary-level easements, lot-line adjustments, waivers for sidewalk set backs and merging boundaries of City land into the Proposed Project in an effort to unify the 15 separate parcels purchased by the owner/developer in 2012. The Revised and Recirculated Notice of Preparation Environmental Impact Report is an inappropriate avenue for the [Proposed] Project as the owner/developer's application requests waivers for height limit restrictions, calls for more than 400 parking spaces and for more than 2,000 daily truck trips of indeterminate tonnage, which has a regional significance /far beyond the intended scope or purpose of an EIR and will have a harmful impact on the surrounding community, which is already a Los Angeles injunction-subject toxic hot-spot of unrelenting oppression.

An EIR also ignores the City Planners who made a self-determination the applicant's Proposed Project has no regional impacts. It is unrealistic as the owner/developer's demands from the City for boundary-level lot-line adjustments, etc. have a disproportionate impact on the surrounding community of businesses, mass transit riders, schools, recreation center users and homes. These impacted parties are entitled to a full scoping review and not the rubber-stamping of a hasty, rock-bottom EIR. The owner/developer's credibility has come into question as differences are apparent between the language of the EIR application and the statements of the owner/developer's representatives. A mixed message has been put out regarding the exact number of buildings the owner/developer plans to build and the number of new living-wage jobs created by the construction of the [Proposed] Project. There are also factual inaccuracies in the owner/developer's EIR application as to the actual width of City streets Long Beach Boulevard East and 41st Street which are to the benefit of the owner/developer. These factual inaccuracies might also be based on a presumption the City will approve mergers of City land on the Proposed Project site, but in any event these choices increase significantly the complexity of the [Proposed] Project and the foreseeable impact it will have.

Lastly, cumulative industrial pollutants in the air, soil and groundwater which have daily impacted this community for years are already under several court and administrative orders arising from actions initiated by state and federal agencies. The application for an EIR to cover the additional industrial pollutants arising from [Proposed] Project raises more questions about regional impact than can be addressed with an EIR with Environmental Justice Analysis under CEQA. The EIR as proposed is legally insufficient to correct these cumulative pollution impacts and the current orders, rulings and laws presently in force in and along the Alamdeda Corridor are for the purpose of correcting the damage already done. In total, City Planning is ready to address the applicant's many requests of the City, but the [Proposed] Project offers insignificant mitigation, which is legally insufficient unless and until public scoping comments are heard at an open hearing under CEQA and the Brown Act.

Background

This comment is opposed to City Planning's attempt to by-pass a public scoping comments hearings, and believes there are many good reasons, any one of which is adequate, to demand a full, open, transparent hearing for the purpose of determining the cummulative impacts of the Proposed Project.

The most recent use of the [Proposed] Project site was agricultural. California agriculture pre-dates California written history, meaning the Mexican and Central-American Seed Bank which was taken and destroyed on or about June 13, 2006 at the Project site was a living link to California pre-history among the Mezo-American ancestors of today's indigenous Americans. The presence of the Seed Bank at the Project site is documented with historical facts surrounding the police action to eject the South-Central Farmers. The Project site is a place where the historical record is not yet closed.

Many species of plants and animals lived at the Seed Bank, now the entirety of the

[Proposed] Project Site. The habitats for the plants and animals were destroyed along with the Seed Bank on June 13, 2006 in an action by the LAPD and subsequent bulldozing. Habitat recovery permitting the plant and animal growth since June 13, 2006 has been made impossible with continual disking by a tractor on the grounds of the Project site.

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The Planning Department's Standard of Review

In determining whether an effect will be adverse or beneficial, the City shall consider the views held by members of the public in all areas affected as expressed in the whole record before the lead agency. Before requiring the preparation of an EIR, the City must still determine whether environmental change itself might be substantial, and if so, holding a public hearing for public comments about the impact of the Proposed Project.

In evaluating the significance of the environmental effect of a project, the City shall consider direct physical changes in the environment which may be caused by the project and reasonably foreseeable indirect physical changes in the environment which may be caused by the project.

A direct physical change in the environment is a physical change in the environment which is caused by and immediately related to the project. An examples of direct physical changes in the environment are the dust, noise, and traffic of heavy equipment that would result from construction of a new sewage treatment plant and possible odors from operation of the plant.

An indirect physical change in the environment is a physical change in the environment which is not immediately related to the project, but which is caused indirectly by the project. If a direct physical change in the environment in turn causes another change in the environment, then the other change is an indirect physical change in the environment. For example, the construction of a new sewage treatment plant may facilitate population growth in the service area due to the increase in sewage treatment capacity, but may then lead to an increase in air pollution as a result from population growth in the new sewage treatment service area.

Economic or social changes may be used to determine that a physical change shall be regarded as a significant effect on the environment. Where a physical change is caused by economic or social effects of a project, the physical change may be

regarded as a significant effect in the same manner as any other physical change resulting from the project. Alternatively, economic and social effects of a physical change may be used to determine that the physical change is a significant effect on the environment. If the physical change causes adverse economic or social effects on people, those adverse effects may be used as a factor in determining whether the physical change is significant. For example, if a project would cause overcrowding of a public facility (like a toilet) and the overcrowding causes an adverse effect on people, the overcrowding would be regarded as a significant effect.

The owner/developer's EIR Application Will Convert Unique Farmland of Statewide Importance.

The City of Los Angeles and L.A. City's Port Authority recognized the Project site as farmland since they issued "Permit 94" to further certify the earlier agreement to allow an agricultural focus at this site. Permit 94 has never been altered, thus there is a map that this area was permitted to be agricultural land. Until June 13, 2006, the site was likely the most unique farm of any size in the USA and may well have been the most biologically diverse due to the wide range of traditional food and medicinal crops being grown including crops grown from rare heirloom seeds from Latin America. Endangered species such as the Red-tailed hawk were photographed on the site prior to June 13, 2006.

At this time, I have no confirmation that Los Angeles Unified School District ("LAUSD") was informed about the [Proposed] Project before the Department of City Planning's June 13, 2013 hearing. I am aware of no comments back from LAUSD. LAUSD is entrusted with the health of its students, teachers and staff, and an absence of comment from such an interested party as LAUSD does imply the District has not yet prepared a comment, given the vast reach of the Project. As this comment will show, LAUSD and others will be impacted by the City's planned growth, so widespread is the human and species habitat impact of the Project.

The explanation for caution and a scoping hearing for public comments is that the [Proposed] Project is designed to only remain for a definite number of years. Once built, everything on the [Proposed] Project site will be lost with no hope of recovery. What came before on the [Proposed] Project was a Seed Bank, which held the agricultural and horticultural genetic transmissions from Mexico and Central-America. The Project is on a site where many thousands of persons in the neighborhood are forced each day to compete with the [Proposed] Project for water, air, shelter and sustenance. The Vernon Avenue Blue Line Station averages 5,200 passengers each day, with over 250,000 passengers riding the Blue Line annually. Traffic patterns account for over 10,000 car trips a day through the area, and the surrounding community consists of a public recreation center (The Arthur K. Snyder City Recreation Center) and an LAUSD high school, Jefferson High. Pedestrian traffic is constant throughout every day as bus and the Blue Line bring persons into the region for jobs, school, and recreation.

The determination of whether a project may have a significant effect on the environment calls for careful judgment on the part of the City, based to the extent

possible on scientific and factual data. An ironclad definition of significant effect is not always possible because the significance of an activity may vary with the setting. For example, an activity which may not be significant in an urban area may be significant in a rural area. In this situation where having a truck depot may not have significant effect in the middle of a pasture, in the middle of an occupied City, the Project represents a degradation of the environment, threatening human health and the Project site with an irrevocable commitment of resources.

The upcoming Department of City Planning ruling on the applicant's EIR is premature because it does not address that City Planning planners made a determination the Proposed Project is not regional in scope. If the owner's disclosures to the Department of City Planning or the Zoning Administrator lacks adequate credibility, the Department of City Planning must first hold a scoping hearing for public comments before evaluating the applicant's EIR.

Owner's Application for An EIR

The applicant's presentation included drawings of a series of 46 foot-high buildings. The overly tall buildings will prevent existing light and air from reaching the land and community, eliminating a vital resource necessary for persons on the ground.

The environmental documentation indicates that the applicant's proposal would generate an additional 2,581 truck trips a day, which is a region-wide impact on traffic, air and noise pollution and on a wide-range of sensitive receptors.

Owner's Current Application for an EIR is Premature

It is my belief that the [Proposed] Project is not a whole lot different from the general scenario in 2008 EIR application for the same parcels. However, the [Proposed] Project herein calls for developing even more of the site, without the 2.7 acre set-aside requested in 2008. The planned industry for the site are similar -- garment manufacture -- unless the vagaries of the [Proposed] Project are changed. Why did an EIR make sense in mid-2008, but is not necessary now, even though conditions are unchanged in 2013?

On its face current EIR "proposal" is very confusing. Department of City Planning files have owner-developer documents which state the owner's LLC formation date was in 2011, before sale was concluded in 2012, when the current owner received title to the 15 contiguous lots which make up [Proposed] Project site. Also, documents in the Department of City Planning file indicate that construction of just one new building is proposed on the site, which the owner/developers relies on for their traffic study submitted with the EIR application. Yet the subdivision plans and owner/developer representatives indicate they would like an EIR approval to cover construction of 4 new buildings, although there is a map submitted in the application which indicates perhaps the [Proposed] Project calls for two buildings. Finally, because of the large number of names, titles, entities and individuals named on documents in the EIR Application, it is impossible on the face of the EIR Application to determine when the owner/developer is submitting a hard proposal and when they are submitted in a

hypothetical scenario.

For the Department of City Planning, the EIR must withstand scrutiny as a CEQA review document. A CEQA review document "must include detail sufficient to enable those who did not participate in its preparation to understand and to consider meaningfully the issues raised by the proposed project." Laurel Heights Improvement Assn. v. Regents of University of California (1988) 47 Cal.3d 376, 405. The [Proposed] Project's EIR herein fails to specify what the project actually is, which is a fatal flaw under CEQA. Y An "accurate, stable, and finite project description is the sine qua non of an informative and legally sufficient" environmental review document. San Joaquin Raptor Rescue Center v. County of Merced (2007) 149 Cal.App.4th 645, 655, quoting County of Inyo v. City of Los Angeles (1977) 71 Cal.App.3d 185, 193. Accordingly, the EIR fails at this most basic level as an adequate informational disclosure document. Yet City Planning moved with the determination the EIR should move forward because the Proposed Project is not regional in scope. My belief is City Planning determined on the impetus and relentless pressure from the Applicant.

Grounds For Opposing City Planning's Environmental Impact Process

If the City approves an Environmental Impact Report from the owner/developer, the result will be a mistake which cannot be undone by any mitigation whatsoever. The people of the City and of California are liable for public health and other damages arising from the Department of City Planning's mistake. Approval of the Plan by the Department permits owner/developer to apply an irrevocable commitment of resources, all of which are adverse to the well-being of healthy and unhealthy persons living, working, studying, recreating or traveling through the area, adverse to the adjacent infrastructure of multiple jurisdictions (County, State and Federal), are adverse to the area's unique ecosystem, i.e., the topsoil, groundwater and air quality, to the presence (until June 13, 2006) of endangered, threatened plants and animals, and adverse to important elements in the historical and pre-historical periods of the affected land known as the South Central Farm (the "Farm").

The City's study of owner/developer's EIR application is over 775 pages long with dozens of large blueprints and illustrations. I am a busy person who cannot devote the same amount of time as a professional person who understands all of the language of developers and the Department of City Planning.

My opposition to the Project is based on (1) an ordinary understanding of the site vicinity; (2) some of the plain numbers found in the owner/developer's EIR application and (3) Hazardous Materials Density Maps Created Using SCAQMD Data.

The owner/developer's EIR application evades the 57,322 cubic yards of topsoil threshold which activates the SCAQMD "fugitive dust" statutes. SCAQMD's July 2, 2008 report clearly limits the developer's ability to excavate as described in the application and the Plan. The owner/developer's evasion is carried out by submitting vague plans to build 2 or 4 buildings on the site, removing the 2.7 acre open-space set-aside containing in the owner's 2008 EIR application, and using extrapolated data from a traffic analysis which uses construction of a single building as its traffic

baseline. This goes to the owner/developer's credibility and is sufficient to reject the EIR.

At the June 13, 2013 Department of City Planning hearing, the developer's representative stated the primary concern of the developer is to fast-track the proposed City easements, City vacations, accommodations and granting of a cul-de-sac sought by the developer. I believe the Government Code requires the lead agency to scrutinize all plans which re-draw boundaries of the land, and properly apportion the benefits and responsibilities of the parties.

Also at the June 13, 2013 Department of City Planning hearing, the developer's representative stated the developer is not asking for a zoning variance. Building height limits in the City of Los Angeles are enforced by those who oversee the City's Zoning Board. In this situation the owner/developer's EIR application asserted the 46 foot high buildings are not in the Zoning Board's jurisdiction. In 2008 the owner's application asked permission to hoist 3 air-borne condominiums on the [Proposed] Project site (does anyone know what an air-borne condominium is?). In the ariel of this scenario, no building height ordinances are involved according to the owner/developer.

Also at the June 13, 2013 Department of City Planning hearing there were no comments from the City's Department of Engineering on whether the [Proposed] Project's substandard "private" sewers, and questionable sidewalk setback requests, easements and vacations. (Owner/Developer is requesting an 8 foot sidewalk with a 4 foot easement, when in 2008 the Department of Engineering pointed out there already was a 10 foot City sidewalk on that side of the street.)

My concern is the EIR would affect the community based on the existence of environmental racism. The owner/developer's application is subjecting low-income Sensitive Receptors within the site's zone of existing unhealthful air quality to unacceptable additional pollutants, has an impact on the existing community from industrial-level noise, vibrations, air-borne diesel particulate matter, light pollution, unregulated handling of hazardous and dangerous materials by uncertified, untrained personnel (new and used hydraulic fluid as acknowledged in the City's Plan (page III-32)).

This is proven by two maps drawn from SCAQMD data attached to this supplemental comment. In the first map, of the site vicinity, SCAQMD has identified 224 hazardous materials sites within 1,000 feet of the project site. In the second map, SCAQMD has identified 21 hazardous materials sites with 1,000 feet of the developer's residence, a greater than 10:1 ratio. The developer's application and the City's Plan clearly proposes a toxic project in a residential neighborhood currently relied upon daily by residents, workers, students, commuters and youth. The developer's residence is in a neighborhood which would not tolerate and could not support a toxic project, yet the developer insists the Department of City Planning approve the Negative Mitigation Declaration in this neighborhood because the people who use that neighborhood are poor and non-white.

By the owner/developer's own words, three of the proposed new buildings, up to 360,000 square feet, will be warehouse storage space. Only one of the proposed buildings, as much as 120,000 square feet will be devoted to garment manufacturing. The owner/developer claimed to be bringing jobs to the community under their [Proposed] Project, but admitted that few new employees will be hired, as the plan is for most of the owner's employees to be transferred from other locations, currently "within walking" distance." The owner/developer made no offer of creating "living wage" jobs as called for in the City Charter, but said employment at the [Proposed] Project site would pay "slightly over minimum wage" with health benefits, with no specifics provided.

Accuracy of Owner/Developer EIR Claims

The owner/developer's EIR application claims to require 3,600 cubic yards to "CUT" the [Proposed] Project footprint and 4,000 cubic yards to "FILL" the footprint (Section "J" Grading). However under Section "K" (Import/Export) the owner/developer claims only "400 Yards Import" of FILL is needed to cover the 3,600 cubic yards "CUT". Is the owner/developer dancing around the fact they want to pour 3,200 cubic yards of concrete to complete their footprint? If yes, on which surface will the 400 Yards Import be laid? If no, how is 400 Yards Import going to satisfy the need for 4,000 cubic yards of FILL the [Proposed] Project is calling for? This is evidence of an obvious conflict on the face of Sections "J" and "K" because 1) It shows the scope of the [Proposed] Project is much larger than the scope of an EIR and 2) no landscape component has been submitted with the EIR application.

Under the City of L.A. CEQA Checklist, there are claims made in the owner/developer's EIR application with regard to the widths of Long Beach Ave. and of 41st Street -- a highly-dense mixed-use neighborhood with public schools, a recreation center, a Blue Line station and numerous businesses, homes and houses of worship. There are two residences right across 41st Street, more on the Long Beach Ave. 1 block heading south between 41st Street and 41st Place, and then a whole block of homes on 41st Place. There are also residents living not far west of Long Beach Ave. across some tracks and down the block. Perhaps a disqualifier for this this EIR application is the claim that Alameda Street lies to the south of the project site. Alameda Street is the [Proposed] Project boundary to the east.

The EIR application describes many changes in projects, changes in who is proposing and doing the maps, and changes in whether the PIMA development would involve one, two, or four buildings (or is that main buildings?). The traffic study submitted is a vaguery from an older proposal for "a warehouse." This study reaches for an extrapolation based on the "warehouse" study to obtain questionable conclusions regarding one or more scenarios for the [Proposed] Project. There are larger maps which indicate both that the [Proposed] Project wants a subdivision into 4 parcels and buildings, while another map seems to indicate only two buildings are proposed. But the traffic analysis submitted with the EIR application presupposes the site will be a single warehouse. Which incarnation of the project are we on today, when will the owner/developer come out and say exactly what they want the scope of the [Proposed] Project to be? Until the Department of City Planning obtains concrete

facts about what the owner/developer has intended, no EIR can rightfully be granted. I would like to know who in the Department of City Planning determined which issues and checklists are to be reviewed in the owner/developer's documentation, and which issues and checklists would be by-passed by analyses?

Mitigation Proposed in EIR

Standard landscaping is certainly inadequate to make up for the concentrated building in this particularly polluted neighborhood. "Page 3 of 5" of an unnamed document in the owner/developer's EIR application says under "IV. Commercial, Industrial or Other Project" that just 4% of the site area will be devoted to landscaping – and likely a smaller percentage than that if there are larger driveways as called for during the June 13, 2013 Department of City Planning hearing. This mitigation is vastly reduced from the 2.7 acres open-space set-aside proposed in the owner's 2008 EIR application. To my knowledge, this is the only mitigation proposed by the owner/developer.

Current Environmental Status

At present, the atmospheric situation is so volatile that an Environmental Justice Analysis is necessary to gather data on the foreseeable impacts of the [Proposed] Project to the interests of low-income, racially excluded, and environmentally challenged sensitive receptor persons in the area of the [Proposed] Project.

Air Pollution

Cumulatively, considerable effects cannot be cavalierly dismissed as it was briefly in the EIR. Especially in quite polluted communities such as those along the Alameda Corridor, some air contaminants which may seem comparatively individually limiting may be the next straw to break the camel's back and lead to cancer or a serious respiratory condition. There is not sufficient evidence to dismiss cumulative impacts as not requiring thorough analysis which would be best achieved through an Environmental Impact Report process.

Sensitive Receptors are combusted by the [Proposed] Project, because their lungs burn first. Like a keystone domino whose single falling starts rows of dominos to fall, Sensitive Receptors protected under the law are intended to fall as the last in a line, and not to be the trigger for the owner/developer's dream of growth as the last gasp of the weakest among us.

As of 2005 Los Angeles County had approximately 590,000 persons who suffered from heart disease or respiratory illness, about 6% of all County residents. By public health accounts, the statistical percentage, the actual number of persons afflicted with heart disease or respiratory illness is unchanged or has increased. In particular, air pollution hot spots, such as the one created by Excide Technologies emissions, located 2.9 miles due east of the [Proposed] Project, has experienced a local increase in daily excess emissions. In regions experiencing high CO2 levels, high UV index readings and air-borne diesel particulate matter, a multiple of 6% can be

applied to regions afflicted with high pollution. The project is planned in a community where 40,000 each day work, study, commute or visit and in a region with all of these pollution factors and a multiple should apply to 6% of 40,000 with heart disease and respiratory illness. This at least 6% of persons are called Sensitive Receptors.

Sensitive Receptors' Public Health in Los Angeles already bear a burden unequal proportion to the healthy population in response to the City's growth impacts. CO2, airborne Diesel particulate matter, unhealthful ultraviolet rays and daily Stage-1 smog alerts are indicators of an environment impacted by growth. Sensitive Receptors are disproportionately impacted by the City's growth. A healthful person blessed with enough rest and sense of security may adapt healthfully to planned growth impacts, possibly to the benefit of growth for the City and healthful individuals. For Sensitive Receptors, the City's growth impacts them with each breath they breathe. The City's Health Risk Assessment only measures cancer risk to airborne diesel emissions, but Sensitive Receptors who must breathe 5 or 6 times each minute coping with CO2 and a high ultraviolet index will hope to live longer enough to one day be diagnosed with cancer. The City's policy on Public Health is clear – Only the healthful and the City will be unaffected by the City's planned growth impacts. To the shame of the City and dedicated public servants whose lives are dedicated to preventing negligence and minimizing unintended consequences, the Plan for 41st and Alameda Warehouse Project bases the rationale on the City's Regional Operational Analysis for calculating truck volumes that it does on its Environmental Analysis. The City is handing off the irreversible consequences to Public Health to the DHS (Dept. Health Services). Any credible inclusion of life-safety issues into any final City plan is beyond the few and several City agencies and the LAUSD the City claims to have commented on the Project. LAUSD must be given adequate time to assign a capable staff to complete review of the impacts on one of its high school campus communities.

The Public Health has degenerated and the City is on Notice that the General Plan the Council District 9 Community Plan cannot carry out illegal poisoning of human life to satisfy their urgent need for growth by ignoring the foreseeable impacts of irreversible acts. The decision by the City to approve a Negative Mitigation Declaration which permits an irrevocable commitment of resources is a great risk, and the risk falls directly on the Public Health of 40,000 persons each day who are not parties to the City's General Plan and Council District 9 Community Plan. LAUSD must be given time to insure the health of their entire high school campus community will not endangered by the City's Plan. The consequences to the City's action, once made, will stand as a consequence of the City's stupidity in failing to acknowledge the Public's right to survive on the air.

Regional Air Quality Restrictions

Exide Technologies ("Exide") (located at 2700 Indiana Street, 90058) recently won a Temporary Restraining Order from the California Department of Toxic Substances Control(DTSC) arising from Exide's continuing releases of airborne lead, airborne

cyanide and groundwater discharge from a leaking pipe. Exide, a lead battery recycler in Vernon, was shuttered by DTSC during April and May, 2013 as a public health threat, has won the right to reopen, at least temporarily because of delays in the State Office of Administrative Hearings. According to KPCC reporter Molly Peterson, Exide's own inspection video had revealed holes in underground pipes that leaked wastewater into the soil. A health risk assessment released by air regulator SCAQMD has continually found sharply elevated cancer risks from cyanide and lead emissions for nearby workers and people who lived near the facility, which is 2.9 miles away from the [Proposed] Project site.

Adjacent Air Pollution Sources

SA Metals Recycling
Welding Shop
Alameda Corridor Above-ground railroad tracks
Alameda Corridor Below-ground railroad tracks vented to street

I disagree with the EIR claim that there would be a less than significant impact as far as exposing "sensitive receptors to significant pollution concentrations." Inadequate evaluation and analysis of air contaminants which are especially prevalent already in the Alameda Corridor neighborhoods and such emissions will increase under the owner/ developer's [Proposed] Project.

These are present-day air pollutants which exist in violation of federal and/or state ambient air quality standards for the Alameda Corridor neighborhoods of South L.A. Are such violations acceptable, and will the amount of days in which the Alameda Corridor area will be in excess violation increase?

An observer from the neighborhood adjacent to the Proposed site has informed me that on the streets three days per week the local scrap metal recycling businesses open for business 8-hours per day accepting Scrap metal from sellers who fill Long Beach Boulevard East and Martin Luther King Jr. Blvd. 8 hours per day, 3 days per week waiting to sell their individual trove of scrap metal to SA Recycling at Long Beach Blvd. East and Martin Luther King Jr. Blvd.

Soil Conditions

Topsoil

1. Owner-Developer's EIR application provide no evaluation or analysis of soil contaminants (including for hexavalent chromium specifically mentioned by Councilwoman Jan Perry on October 24, 2011 at the City Budget & Finance Committee hearing related to this site).

Groundwater Testing

IX. HYDROLOGY AND WATER QUALITY" make no sense seeing that the PIMA site

is flat and 95% unpaved so that the water from rainfall or the hose drains into the ground primarily rather than offsite to sewers, etc. If 96% of the site is paved or buildings, of course this substantially alters the existing drainage pattern on the site.

Cumulatively considerable impacts on probable future projects including the foreseeable but undeclared need in this Project is additional subterranean infrastructure to accommodate waste water and water run-off, rail-bed shoring for the light rail and freight trains which run continually 47 feet from the western edge of the Project. Any future project would know to foresee the Level of Service along 41st Street in both directions. The diversity of the zoning designations adjacent to the Project site consists of six stated zoned areas, and 1 or 2 unstated zoning areas which are not represented in the Plan. On this basis, probable future projects are now facing an impossibly wide choice of possible cumulatively impacts.

Significant Impacts include increased health risk factors from sources arising from the Project. These are air-borne diesel particulate matter, industrial waste water run-off from 1,200 truck parkings each day, rivers of human waste running off of a Project with zero planned bathrooms for truck drivers, Proposition 65 hazardous transport and disposal site (not stated in the Project but a foreseeable amendment to a foreseeable CUP application re Storage and Transport of Hazardous Materials). Should the Project be employed to store dangerous materials, a specific permit would be required by federal and state jurisdictions.

EIR Traffic Component

The owner/developer submitted vague documentation of its Traffic Study, probably using Caleemod emission calculations. It cannot be determined whether the EIR extrapolated to reach its targeted traffic impact using Caleemod emissions calculations. However, as the Owner's 2008 EIR application claimed there would be an additional 2,581 truck trips per day, in 2013 it lacks credibility to say the owner/developer's larger [Proposed] Project will only generate 2,000 additional total vehicle trips per day. The owner/developer's own action says the EIR is overreaching to minimize its traffic impact. Below is a brief analysis of foreseeable Traffic Impacts.

Traffic Impacts

With respect to the owner/developer's EIR application, non-compliance with Environmental Analysis Section 15, Transportation and Circulation, is guaranteed because the satisfactory traffic intersection level of service is whatever traffic demand is placed on the Project. A satisfactory level of service on streets and highways cannot be reached under the EIR. The City's final approved Plan for the [Proposed] Project must account first for providing sub-surface infrastructure and calculate the impact of the project on the EIR's planned subterranean infrastructure, including wastewater and water-borne run-off. As planned, there will be constant run-off because even with the optimistic and possibly extrapolated 2,000 additional vehicle trips per day (approx. 100 trucks per hour) and no plans for bathrooms for 100 truck drivers, subterranean infrastructure shall expect flooding of untreated human waste.

The [Proposed] Project increases traffic density and intensity by elevating the Levels of Service (LOS) on the 41st Street intersections at Alameda and East Long Beach Blvd., which are subject to light-rail and freight train delays and signaled crossings. Signal crossings are now at a sensitive time with raised public awareness following the Metrolink truck train murder conviction in June 2008 and region-wide rail crossing deaths and injuries.

A [Proposed] Project which increases traffic without establishing the ability of the transportation system to accommodate the increased traffic created by the [Proposed] Project, as described with Policy 15-1.1, conflicts with State Code Section 65300, et seq. The Project Site is an isolated island in a sea of failed and inconsequential intersections which the City wants to now serve as a LOS F, based on 100 truck receivings each hour.

The City is on notice that a zoning change under the scope of an EIR cannot be granted because the Alameda Corridor transportation system and the local community cannot now accommodate the increased traffic generated by the Project. For the Department of City Planning to grant a zoning change outside the scope of an EIR is a violation of the General Plan and State Code because the City's operative policies conflict with Sec. 65300. The City has an obligation to fulfill its Contract to develop the City consistent with State Code Sec. 65300.

There is a proven positive correlation between automotive traffic and harmful air borne 2.5 particulate matter emissions. Every increase of per/day number automotive vehicle trips results in an increase in harmful air borne 2.5 particulate emissions. The owner/developer's application is vague on the daily gross vehicle tonnage created by the [Proposed] Project, but the EIR does admits to adding harmful air borne 2.5 particulate emissions from over 2,000 daily automotive vehicle trips and over 400 automotive vehicle parking spaces.

To approve an EIR based on an inadequate traffic analysis makes the Department of City Planning seem oblivious to the fact that thousands of additional vehicle trips a day certainly means more air pollution and more folks who are sensitive receptors being exposed to such toxins. In this day and age, I consider it appalling that a traffic analysis does not include an analysis of how many trucks (going to and from the site each day) which have a 53 foot trailer plus a large sleeper cab. These huge trucks cause traffic havoc especially on narrow streets such are those around the PIMA development site. Whether these larger commercial trucks will be coming and going from [Proposed] 4051 Alameda on a regular basis is an issue beyond the scope of an EIR application, it calls for an EIR/EIS.

Besides logistical nightmares relating to sizable trucks navigating the narrow streets around the [Proposed] Project site (even if they aren't the large semi tractor-trailer trucks), there is a lot of pedestrian, bicycle and other traffic which crosses Long Beach Ave. East, over two sets of train tracks, and then Long Beach Ave. West. The L.A. Regional Food Bank is concerned about truck traffic in the area interfering with their important work. While there will be many problems on various parts of the site and in workers getting to the site during and after construction, increasing truck traffic

on 41st Street will overwhelm L.A. Food Bank and pass-through truck traffic on 41st (the latter mostly heading to Vernon). Although unstated in the owner/developer's EIR application, larger trucks will probably require the widening of 41st Street and/or Long Beach Ave., impacting pedestrian, bicycle and passenger crossing the street at this site, with a statistical likelihood of increase in accidents, especially involving kids.

Available Alternatives

As an Alternative to the [Proposed] Project, the site could be restored to a full 14-acre, working community garden to benefit the community, the air, the soil and water.

During the South Central Farm's operation as an agricultural and horticultural resource (1992-2006), a Seed Bank was begun using rare and important plants from California, Mexico and Central-America. The cultivation practices at the Farm were consistent with traditional methods which predate written history. The use of the Farm as an outdoor classroom laboratory was consistent with Permit 94 and L.A. Regional Food Bank goals for local food self-sufficiency and was successful, providing enough food for over 1,000 people each day.

California agriculture pre-dates California written history, meaning the Mexican and Central-American Seed Bank which was taken and destroyed on or about June 13, 2006 at the Project site was a living link to California pre-history among the Mezo-American ancestors of today's indigenous Americans. The presence of the Seed Bank at the Project site is documented with historical facts surrounding the police action to eject the South-Central Farmers. The Project site is a place where the historical record is not yet closed, with Appellate Court Arguments set for June 16, 2008 in Los Angeles.

Many species of plants and animals lived at the Seed Bank, now the Project Site. The habitats for the plants and animals were destroyed along with the Seed Bank on June 13, 2006 in the police action. Habitat recovery permitting the plant and animal growth since June 13, 2006 has been made impossible with continual disking by a tractor on the grounds of the Project site.

Plant habitats once lost are difficult to restore and the Project Plan as proposed is solely in the City's interests in growth, which as planned guarantees that no plant growth could ever return to the habitat lost June 13, 2006.

Present Environmental Quality on the Project site, which was formerly a Seed Bank, has most recently been disked using a tractor. A guava tree was known to be growing prior to the most recent disking, although the guava tree's whereabouts are uncertain. Prior to June 13, 2006 the Project site was a Seed Bank for Mexican and Central-American agricultural and horticultural plants. Native birds and resident small mammals, possibly including a bat, as well as common and beneficial insects also had a documented presence.

New Information on Foreseeable Public Health Impacts

As you must know, with the addition of the owner/developer's Phase 1 analysis to EIR application, the [Proposed] Project plan is over 775 pages, with less than 1% of those pages related to additional PM2.5 (Particulate matter over 2.5 ppm, usual automotive exhaust). The Project will release PM2.5 in the public ambient air hourly from the moment the City permits the developer to commencement of excavation, without end.

As you also know, more than 10% of the developer's application and the City Plan is concerned about concluding the issues of easements, vacations, accommodations and a cul de sac.

Based on this ratio alone the City has only 1% concern for the sensitive receptors among the 5,300 people daily using the above-ground Blue Line light rail station, 2,000 people in the Jefferson High School community, 500 children attending Irving Middle School and thousands of workers, residents, shoppers and commuters who use the neighborhood each day.

By this same ratio, conversely, or perversely, the City has a 10% concern for the disposition of the City's interest in the approximately 14 acres of real property commonly known as the South Central Farm at 41st and Alameda, Los Angeles 90058.

Balancing these concerns as well as the amount of time I have to review the recent policy literature related to the known public health impacts PM2.5, ozone in the Alameda Corridor region, these comments provide about 1% of the total information the City needs to have included in the public comments regarding the above-referenced Proposed Mitigation Negative Declaration. I urge you to also review the remaining 99% of the comments for the total information the City needs to have available from interested public agencies as cited below.

I Demand City Planning's Determination Of No Regional Imnpact Be Reversed and The Full Environmental Impact Report with Environmental Justice Analysis Be Delayed Until a Public Hearing on the Scope of the Proposed Project May Be Heard.

The owner/developer's EIR application claims all of the risks of the Project are nominal, negligible and undeserving of the scrutiny of an Environmental Impact Report. However, the impact of diesel particulate emissions on children's health is the subject of recently-passed SB 974 (Lowenthal-Long Beach), which funds $400 million a year in cargo surcharges to mitigate the health damage caused in port-related areas like the Alameda Corridor, where the Project site is located. See Exhibits, Page 22, SB 974 (Lowenthal) Port Investment Bill (7/14/2008).

The City must correct its failure to adequately assess the environmental impacts of the proposed construction work on the Project site, specifically the failure to accurately and fairly assess the foreseeable diesel emissions building the warehouse will generate in the vicinity (especially of cancer-causing diesel particulate matter). The owner developer's EIR application fails to make meaningful recommendations or recognize the scientific need for mitigating these dangers.

To the contrary, public health concerns are supported for public decision-making agencies. Goods Movement Emission Reduction Program (CalEPA), Page 7, "Methodology for Estimating Premature Deaths Associated with Long-term Exposure to Find Airborne Particulate Matter in California (outline only, originally posted at ftp:\\ftp.arb.ca.gov/carbis/board/books/2008/052208/08-5-5pres.pdf)

The July 2, 2008 demand by the South Coast Air Quality Management District ("SCAQMD") is on point. SCAQMD demanded responses from the City on all of the issues it raises, as per the law (Public Resources Code § 21092. 5(a)), and they want these responses in writing before a final Environmental Impact Report is issued. Interestingly, the City's plan did not state that SCAQMD was among the agencies notified of the Negative Mitigation Declaration, as required under Public Resources Code § 21092. 5(b). And it is unknown whether LAUSD was timely notified of the [Proposed] Project's EIR application.

SCAQMD is concerned about "fugitive dust" from the proposed excavation, and calls for a "fugitive dust analysis" limiting the proposed Project to 5 acres of excavation. SCAQMD also accuses the City of using overly vague descriptions of proposed mitigation efforts of the proposed Project excavation equipment. The City claims 40% air-borne diesel particulate emission reduction using a special diesel oxidation catalyst. Unfortunately a 40%-reducing diesel oxidation catalyst does not exist for excavation equipment, which means at this point SCAQMD will not sign off on anything sent by the lead agency. See Exhibits, Page 1 Lead Monitoring Data at Excide (Dec. 2006-June 30, 2008, South California Aquality Management Board.

The apparent dangers of Project are obvious to the SCQMD (whose Board Member is the L.A. City Councilperson for District 9), yet the City appears to have used the Negative Mitigation Declaration to cover-up the dangers in the developer's application and the City's Plan. The City's Plan used estimated diesel emissions for the completed Project calculated from purportedly "similar" emissions issuing from a nearby facility. The estimations were used as a measure for the probable impacts on South Central residents adjacent to the site. But according to the SCAQMD the warehouse used in calculating the estimated emissions serves "substantially fewer" trucks than the 2,581 trips a day proposed for the Project. SCAQMD notes that diesel emissions (and proximately-caused cancer risks) were "substantially underestimated" in the City Plan. SCAQMD calls for the City to "correct or explain this apparent discrepancy."

SCAQMD also accuses the City Plan of underestimating the emissions created by truck idle time by one third. SCAQMD rightfully insists that a mitigation plan prohibiting trucks from idling for more than the ten minutes is realistic, and they demand the City provide enforcement to add teeth to the idling diesel prohibition.

Finally, SCAQMD recommends that the City "specifically prohibit" land uses at the site that would, in an area already full of warehouses, "further expose" nearby schools, health facilities, the aged and the ill to "additional cancer risks from diesel

particulate matter." As a reminder, the Site is 1,000 yards from a City recreation center, 2,000 yards from an LAUSD high school, 1,000 yards from an above-ground light rail station with over 5,000 daily boardings and alightings, 1,000 yards from an LAUSD middle school, and adjacent roads and neighborhoods are used daily by thousands of residents, workers and commuters.

A full Environmental Impact Report with an Environmental Justice Analysis is necessary to protect the City, LAUSD, State agencies, Federal environmental laws, the existing community, transit riders, commuters, the eco-system, local property owners and the railroad, from owner/developer's planned environmental degradation. See Exhibits, Page 5 Overhead photographs of Excide Facility 2.9 miles from [Proposed] Project site.

Title VI of the United States Civil Rights Act of 1964 mandates that the Planning Department identify and address any disproportionately high impact on communities of color and low-income populations including examining the socioeconomic, racial, and environmental conditions.

An Environmental Justice Analysis will gather necessary data on the foreseeable impacts of the owner/developer EIR application on the interests of low-income, racially excluded, environmentally-challenged persons in the area of the Project site.

In June, 2013 Exide went to Superior Court to ask a judge there to block the suspension. Judge Luis Lavin Monday, on June 14, 2013, issued a temporary restraining order against the Department of Toxic Substance Control, writing that Exide would be irreparably harmed by a slow administrative hearing, and that the public interest will not suffer by allowing the lead recycler to get the Vernon plant back to work with concomitant release of excess lead, arsenic, and groundwater emissions.

Thank you for your attention to this matter.

Jack Neff
jackneff01@yahoo.com
P.O. Box 491272
Los Angeles, CA 90049
(310) 612-2279

cc: Hon. Paul Koretz
Andy Shrader

Appendix

ARB moving on EPA-California Clean Air Mandates - Cal v. Bush EPA Enforcement Date Looming

http://www.arb.ca.gov/bonds/gmbond/gmbond.htm

Goods Movement Emission Reduction Program
Lead Agency: California Environmental Protection Agency / Air Resources Board
Recipient Agencies: South Coast AQMD Early Grants Proposal (PDF) for $25 million FY2007-08 Funds

Program Status: The Legislature appropriated the first $250 million in the 2007/08 State Budget. Senate Bill 88 (Chapter 181, Statutes of 2007) is the implementing legislation for the Program, amended by Assembly Bill 201 (Chapter 187, Statutes of 2007).

* Adoption and Implementation Schedule

The Board adopted the Guidelines and approved the funding targets and early grant projects on February 28, 2008 in Sacramento. We solicited applications from local agencies to fund projects that directly reduce air pollution through the use of cleaner equipment and are now evaluating those applications. ARB will hold a public hearing and allocate the remaining $221 million in FY2007-08 bond monies to local agencies on May 22 in Fresno. We expect that those agencies will begin announcing the availability of incentives for equipment owners in Summer 2008.

Accountability Plan: The three-part accountability structure for this Program, required by Executive Order S-02-07, has been approved by the Department of Finance on February 27, 2008.

* Goods Movement Accountability Plan (PDF)
http://www.arb.ca.gov/gmp/docs/gmap-1-11-07.pdf

Goods Movement Action Plan Jan. 2007
See letter of policy from Joint EPA/Bus., Transp. & Housing Agency (US) P. 5 "The Schwarzenegger Administration has established a Cabinet Working Group Pg 5

Pg. 91 338,90 tons emissions per day over 18m population LA-Inland Empire Chart V-13

Smart land use (aka Smart Growth close to wise use (decline)) generates additional savings for state and local governments by minimizing bloated planning process for overdesigned high-output projects. pg. 137 in pdf, pg VIII-14 in report. Calls for "Green Freight Corridor" part of the Green Freight Initiative an innovative and creative series of recommendations for using open space and land restoration projects (like the South Central Farm) to mitigate PM2.5 and ozone releases into ambient public air

http://www.arb.ca.gov/research/health/pm-mort/pm-mortdraft.pdf

Draft Staff Report of May 22, 2008 Methodology for Estimating Premature Deaths Associated with Long-term Exposures to Fine Airborne Particulate Matter in California by Cal-EPA, Adams, Administrator, Hein Ti Tran, Project Coordinator, with panels of

contributing Authors, Scientific Advisors and a team of reviewers, including the Chief, Health and Exposure Assessment Branch, Chief, Research Division and Deputy Executive Officer

Appendix A-4 to A-7 - PM 2.5 Air Quality Monitoring Program in California includes 90 Federal Reference Method monitors collecting 24-hour mass data on ambient air quality. Interagency Monitoring of Protected Visual Environments (IMPROVE) collects 2 24-hour samples ambient air as part of an extensive long term monitoring program to establish current visibility conditions to determine causal mechanism for visibility impairment. Local LA County environmental "hot spots" along the Alameda Corridor in 2006 can be visually determined from the color map on A-7.

ftp://ftp.arb.ca.gov/carbis/board/books/2008/052208/08-5-5pres.pdf
Revised Estimates of Premature Death Associated with PM2.5 Exposures in California by Cal-EPA ARB May 22, 2008 (a slide presentation)

Estimate health impacts to public health from ambient levels of ozone and PM2.5

Estimate health benefits to the public of proposed PM2.5 regulations to reduce emissions

Note emergence of post-2002 new studies raising critical health mass on 2.5 Particulate Matter

RELATED: Exide FAQ: Everything you need to know about recycling lead batteries in LA
The company challenged the closure in an administrative proceeding which started earlier this month. But the overworked state Office of Administrative Hearings has not been able to schedule enough time to finish hearing the dispute.

Exide's Vernon plant recycled up to 40,000 batteries each day; it's one of only two lead-battery recycling facilities west of the Mississippi. The company filed for bankruptcy protection last week.

Ernesto Nevarez
52041 Panorama Dr.
Morongo Valley, CA 92256

Attn: Srimal Hewawitharana
Environmental Specialist II
Department of City Planning
via email: srimal.hewawitharana@lacity.org

Re: Case No. ENV-2012-920-EIR, AA-2012-919, DIR-2013-887-SPR/ Proposed Construction of Four Industrial Buildings

I'm concerned about any approval of new construction on the former South Central Farm and urge that no new project be approved until there is adequate public input and review. The last project was full of erroneous information which over time would had caused upset to the immediate area that would had deterred any true economic growth and kept the greater area in despair. It is best that the SCF land be kept as a green area to diffuse future development of surrounding properties needing upgrading.

The former plans showed a very limited ingress into the property with no queuing lane or yard to accept incoming traffic and to keep immediate public streets free of back-up. Based on the anticipated number of deliveries the trucks and trailers would back up traffic all the way to the freeway off ramp. Based on Los Angeles being an international gateway of goods it could be expected that trucks making deliveries will be tractors with 40 foot containers from the harbor and trucks leaving the facility will be tractors with 53 foot trailers. The length of these vehicles have not been taken into consideration in the planning of the ingress/egress portals to the property. The staging of these long vehicle combinations to take their turns to the loading docks cannot be done within the confines of the small yards and will need to utilize the adjoining streets. The plans only show that there is length in front of the loading docks to park a container/trailer but does not evident sufficient space for the additional length of the tractor and needed space for safe maneuvering within the restrictive confines (staging). Off-street queuing lanes and staging areas otherwise the streets will be utilized upsetting the flow of traffic and deterring other businesses from being attracted to the area.

I can't remember reading in the proposal as to how the proposed development would deal with hazardous material shipments. As mentioned there is no queuing lane which means that tractors and containers will be lined up along the streets. The problem intensifies when it is realized that trucks carrying hazmat requiring placards CANNOT be parked on any street within five feet of moving

traffic, i.e. the street. Based on the lack of a major truck stop with overnight parking in the area it will be necessary to provide off-street overnight parking for these trucks so they are not parked on public streets. There is also no mention as to whether the facility will have its' own fleet of vehicles nor where they would park or be maintained. Will these trucks be LNG, CNG, diesel? Will fuel be store? Where and how? Or will the power units fuel elsewhere? Where and what routes to the nearing fueling facility? The public needs and deserves to know.

Another major concern is the underground pipeline infrastructure in the area which will include water, natural gas, oil, etc. The oil pipelines are more common that one imagines as they connect major production areas with the refineries in the harbor area and have countless arteries from the pumping wells to the pipelines. Many of these pipelines are antiquated and can be damaged by 80,000 pound loads traversing them numerous times a day.

A major argument in support of the project is that it is needed to support anticipated increase in importation through the Port of Los Angeles. This is NOT true. There is an overabundance of warehouse space, enough to fill the needs for an increase of container flow in the port for at least the next decade. The trend in "just in time" (JIT) transportation is the utilization of second shifts at the port and in warehousing. Adding a second shift at existing warehouses would be the equivalent of increasing warehousing footage by 50% in JIT transportation.

The above statements are made and concerns raised based on my 25+ years experienced in the trucking industry. I purposely did not address the need for green space as they will surely be address by others. My comments were made as a professional stakeholder and were expressed from a business perspective. I strongly urge a full hearing on this matter.

Sincerely,

Ernesto Nevarez
July 16, 2014

The Acequia Institute
21167 County Rd. J-2
San Luis, CO 81152
Email: dpena@acequiainstitute.org
Mobile: 206-228-4876

July 17, 2014

The Hon. Eric Garcetti, Mayor
Members of the Los Angeles City Council
Members of the Los Angeles Planning Commission

Re: Case No. ENV-2012-920-EIR, AA-2012-919, DIR-2013-887-SPR/ Proposed Construction of Four Industrial Buildings

Submitted via email: Srimal Hewawitharana at srimal.hewawitharana@lacity.org

Dear Mayor, Council Members, and Planning Commission Members:

This marks the fourth time I am asked to offer science-based perspectives and independent third-party evaluation of development plans for the *currently vacated site* of the world-famous and path-defining urban farm known as South Central Farm. This invaluable green space is located in the heart of an overly industrialized section of the Alameda Corridor that dissects the mostly Latina/o and African American communities residing in this area of South Los Angeles.

This area is in demographic transition with a growing number of Mexican-origin families including many with ancient Mesoamerican (indigenous) roots. For e.g., there are an estimated half million Zapotecas living and working across the LA Basin; this Mesoamerican Diaspora is a primary and growing constituency behind the unfolding grassroots urbanism in LA. It is a social force with tremendous productive and creative powers. Studies, summarized by the Dean of LA Urban Studies, Mike Davis, indicate that Mesoamericans – which by the way are also well represented in the ranks of South Central Farmers – are net contributors to positive economic, cultural, and social benefits. For decades, environmental justice scholars – myself included (see Peña 2011) – have been demonstrating how social and ecological capital are often excluded from the cost-benefit metrics used by most EIRs and EISs. The type of reductionism most planning departments are guilty of fixates on *economic values* to the exclusion of all other measures.

Many of you are familiar with my credentials and professional reputation as a research scientist, widely published scholar, philanthropist, and farmer (see attached CV). Allow me to explain the work of The Acequia Institute a bit more. The Institute was established in 2006 with a generous endowment gift from our Father, a Laredo-born *angeleno* by the name of Alfonso C. Peña who made his mark across Hollywood and East LA through Spanish language mass media (both radio and also TV at KMEX). Mr. Peña always valued education as a road to equality and justice and he especially thought that environmental education was important to the creation of a better world.

The Institute's research, education, and grant making activities are focused on supporting environmental education in the fields of agroecology, ethnobotany, and ethnomedicine for public

health through the rejuvenation of local food systems and heritage cuisines. We accomplish this through fellowships for graduate students, tuition scholarships for the youth of traditional acequia farm families, and a variety of direct-to-producer grants and a focus on women-led food sovereignty projects.

The Institute's headquarters are located on 200+ acres on two farms in south central Colorado's San Luis Valley. The principal lands are irrigated by the San Luis Peoples Ditch 1852), considered the oldest water right in what is now the State of Colorado. From this location, the Institute hosts an annual Acequia Agroecology and Permaculture Field School in collaboration with local Centennial School District staff, elder mentors who are experts in the fields, and students from the University of Washington Departments of American Ethnic Studies, Anthropology, and Program on the Environment. Our courses are certified to earn students college credit in the "Ideas and Society" (social science) and "Natural World" (science) core requirements.

The farm also serves as a grassroots agricultural extension service station and we conduct a wide range of plant breeding experiments – one current project focuses on development of a drought- and weed-resistant *Zea Mays* (corn) variety through conventional marker assisted breeding. Using the methods we have already restored an heirloom variety of the local land race of *Phaseolis vulgaris*, the common bean, in this case known as "Bolitas" (little balls).

In this regard, my previously published studies of the ethnobotany of the former South Central Farm site demonstrated that the SCF members created a world-class example of agricultural biodiversity. There was more biodiversity packed into those ten acres than the entire Midwest farm belt; that's a fact. The wide variety of plants grown for food and medicine at SCF were representative of rare and threatened land race heirloom crops from Mexico and other parts of Latin America – Peruvian beans for example. It was like having our own little Mesoamerican Vavilov Center in the middle of LA.

Of course, politics keeps intervening and a shameless type of politics at that has already injured the reputation of at least one former mayor who, honestly, betrayed the farmers even though they raised the $16 million to buy the land at what was a shamefully inflated and speculative price – before the 2007 bubble burst.

I ask our current Mayor, when are we going to stop allowing such *groserias* [grotesqueries] of public policy to continue? Instead of returning this urban site back to its status as a signature and singular achievement for urban agriculture, do you instead propose to offer more of the same drab industrial landscape and its diminished value as urban space in the midst of growing communities with spreading residential occupancy needs?

Will you wrongly choose to introduce an additional set of new sources of *cumulative risk* to a community that is already overburdened with pollution sources and a lack of green space? Are you as elected representatives of this community really wishing to perpetuate a politically unwieldy case of environmental racism that perpetuates social economic injustice? Or, will you be the LA Mayor and Council remembered for innovative urban planning and the vision to finally embrace a world-renowned paragon of environmental sustainability and social equity?

My family has strong LA ties. Our father, A. C. 'Pepe' Peña wanted the Acequia Institute to become the nation's first Latina/o initiated, managed, and funded foundation and grant-maker. We are accomplishing that goal by serving the singular and worthy mission of promoting the environmental and food justice movements.

These movements have significant historical roots in Los Angeles and it is impossible to speak of the history, for e.g., of urban agriculture without first spending time on the place and continued significant role of the South Central Farm as a major progenitor of sustainable, community-based urban farming. The ten-acre site in question is absolutely vital *as green space* for the several thousand persons living within a mile of the site. It is also vital to the tens of thousands from LA and across the globe who made the site a destination during the heyday of the SCF (1999-2006). They will return if the farm is reborn. The prospects for community renewal for these thousands of neighbors and friends of the SCF – defenders of an oasis in an otherwise heavily industrialized area – are directly tied to policies that invest in the revitalization of what was once the centerpiece of a truly vibrant world-class community garden and local food system - indeed, a model for the region and beyond. The current project proposal violates the prospects of such an alternative path. The people of LA can raise whatever it takes to pursue this alternative, so the question remains largely a matter of political will, or force.

Reviewing the proposal for four industrial buildings, I paid particular attention to the underlying rationale (i.e., the Port needs increased capacity among many other unproven declarations and assumptions). I was struck by the audacious incompleteness of such claims. However, the utter disregard for and absence of any serious effort at environmental justice analysis is even more appalling, especially for a case with so much regional and even national and global significance.

I am therefore also struck by the *inherent unfairness of the process of project scoping and evaluation being followed and proposed.* This involves an absolutely unacceptable failure to integrate community-based values, or to draw from the proven effectiveness of participatory research methods that will allow the community, planners, and developers an equal opportunity to get at data relevant to making a science-based comparative analyses of alternative uses that have either been extant on the property or proposed in various creative and democratically-designed projects for a more environmentally, socially, and cultural appropriate *and multiple* land uses at the 41st and Alameda site.

There is a complete lack of open public discourse and analysis of the proposed land use changes and alternatives. It does not take a scientist to understand that democracy requires the fullest participation of the public, and especially the most vulnerable, systematically excluded, and purposefully marginalized populations and communities. People are not poor or hungry because they are lazy or choose to be that way. They are poor because the most powerful actors in our obscenely unequal class society abuse their many political and social privileges to turn all matters of public policy into private advantage and profit; the poor and hungry, be damned; The health and dynamism of the peoples' city, be damned.

The result is a project proposal envisioning an EIR process based on politics rather than standards of scientific risk assessment let alone consideration of federal and state environmental justice principles and practices. I am concerned that, while the project has been moved to the "Major Projects" section of the planning office, administrators seem intent in following a limited scoping and evaluation process that will be seen by the community and experts as violating protections and practices required of the planning process since the impacts are of regional, and I would argue global, significance. The most audacious aspect of this project proposal is the lack of plans for live public meetings in which the public gets to participate in the "scoping" and evaluation process.

The public should also be involved in helping to bring to the fore the alternative land uses that have been proposed or that were extant on the site in the immediate past (1999-2006). These must

figure in any environmental justice analysis, as has been noted in the past with EIRs for other industrial project proposals for the site. *The only way to meet widely embraced standards is to define and study the alternatives to the proposed land use action*. This will allow the community, larger public, and city planners to develop a comparative analysis informing whatever cost-benefit analytic metric is adopted. This also means serious consideration of the more varied and complex equity and due process rights imbricated with the development and implementation of municipal land use policies and practices.

The irony of course is that the alternative proposals – all drawing from past extant activities – had already set in motion dynamic economic and social changes to South Los Angeles that were largely driven by the educational and food justice work of the farmers at SCF. The farmers formed a functioning and democratic organization for self-management of the land in question and generated a wide array of public benefits stemming from educational as well as anti-drug and anti-gang goals and projects. The farm hosted vibrant and wildly popular events including a monthly "Anti-Mall" that brought USC medical students to the area for health care monitoring and other services essential to community health that – like green space – is a rare resource in the neighborhoods surrounding the proposed project site.

Sincerely,

Devon G. Peña, Ph.D.
President and Founder
The Acequia Institute

From: Srimal Hewawitharana
To: Eric Charlton
Subject: Fwd: Please hold a hearing regarding the 4051 South Alameda Street Project
Date: Wednesday, July 09, 2014 9:00:13 AM

---------- Forwarded message ----------
From: **Linda Piera-Avila** <lindap_a@verizon.net>
Date: Sun, Jul 6, 2014 at 12:04 PM
Subject: Please hold a hearing regarding the 4051 South Alameda Street Project
To: "srimal.hewawitharana@lacity.org" <srimal.hewawitharana@lacity.org>
Cc: Linda Piera-Avila <lindap_a@verizon.net>, Jack Neff <jackneff01@yahoo.com>, "tezozomoc@hotmail.com" <tezozomoc@hotmail.com>

Dr. Srimal,

Please hold an EIR scoping hearing regarding the proposed project at 4051 South Alameda St., case number:
ENV-2012-920-EIR, AA-2012-919-PMLA, DIR-2013-887-SPR.

1) The parcel is adjacent to a residential area, with many sensitive receptors living nearby.

2) The land may already have toxic, hazardous materials underneath the surface from previous industrial uses, which would be unearthed and exposed to the atmosphere when the foundations for the new warehouses are built.

3) The Exide battery plant is nearby and its pollution issues have not yet been resolved. Adding more industrial activity in the area could cause the allowable limit of pollution particles to be exceeded since the Exide contribution is still in question.

4) The zip code where the proposed warehouses are to be built is historically the most polluted part of Los Angeles. Adding more polluting truck trips to the area is not acceptable.

5) Recent history of the area shows that the City dedicated this land to the community for an urban farm as mitigation for the Rodney King uprising. This became a cultural icon in the community and around the world. Siting warehouses on the land is to continue to deprive the community of this resource and means of self sufficiency to combat the effects of the local food desert which this area has become. To insist on placing corporate profits above community needs, in a very low income community where most residents are people of color, is to sanction environmental racism.

6) The jobs provided by the proposed warehouses will be low paying and will very possibly be examples of exploitation of workers instead of good paying stable jobs that build the community.

7) The premise that more warehouses are needed should be questioned. Are there warehouses in the area that can be repurposed by these companies? If so, that option should be pursued and the land re-dedicated to the community for an urban farm, purchased by the City with Quimby or other funds.

For these and other reasons, I urge the City to hold a full hearing on the scope of the Draft EIR regarding this project at 4051 South Alameda St., case number: ENV-2012-920-EIR, AA-2012-919-PMLA, DIR-2013-887-SPR.

Thank you,
Linda Piera-Avila
1424 12th St. Apt. E
Santa Monica, Calif.
90401

From:	Srimal Hewawitharana
To:	Eric Charlton
Subject:	Fwd: Case No. ENV-2012-920-EIR, AA-2012-919, DIR-2013-887-SPR/ Proposed Construction of Four Industrial Buildings
Date:	Friday, July 18, 2014 1:06:33 PM

---------- Forwarded message ----------
From: **Leslie Radford** <realleslie@gmail.com>
Date: Thu, Jul 17, 2014 at 2:22 PM
Subject: Re: Case No. ENV-2012-920-EIR, AA-2012-919, DIR-2013-887-SPR/ Proposed Construction of Four Industrial Buildings
To: mayor.garcetti@lacity.org, councilmember.cedillo@lacity.org, councilmember.krekorian@lacity.org, councilmember.blumenfield@lacity.org, councilmember.Labonge@lacity.org, "paul.koretz@lacity.org" <paul.koretz@lacity.org>, councilmember.martinez@lacity.org, councilmember.fuentes@lacity.org, Bernard Parks <councilmember.parks@lacity.org>, councilmember.price@lacity.org, planning@lacity.org, srimal.hewawitharana@lacity.org

At what point does the City, its Council and Planning Commission, listen to the people? By now you have several dozens of letters from ordinary people for whom the South Central Farm remains a symbol and an inspiration of what Los Angeles could be. Instead of nurturing the dream held by so many across the diversity of this City, this city's government has determinedly pursued its destruction. I ask this new City Council, this new Planning Commission, this new Mayor to listen.

I am not an environmental engineer, a public policy analyst, or an urban planner. I speak to what I read and experience, to what I know is right and necessary. I am no different from most of the people you've heard from regarding Case No. ENV-2012-920-EIR, AA-2012-919, DIR-2013-887-SPR. This is what I know:

The City adopted the Farm already under cultivation, in 1994. The City sold it to the Harbor Department so that it would remain a haven for the community, a provider of fresh food for a hungry neighborhood, a space for cultural preservation. In 2006, the City broke that promise for a few million dollars: the free transfer of the property back from the Harbor Department to the City and then undervaluing the land's worth for a developer. That developer paid taxes on the undervaluation even as he offered it for sale at three times what he paid for it, in the midst of massive property devaluation. Only when he found a buyer were the property and the taxes on it reassessed at market value. The deal the City struck is now clear: that land, in a struggling, working class neighborhood, was only valuable to the City as taxable income on industrial development. Green space belongs to the wealthy; a Million

Trees, Revitalizing the L.A. River, and Great Streets belong to gentrifiers; three warehouses and a sweatshop belong to the poor.

In all of that time the City refused to honor its partnership with the South Central Farmers. For years the Farmers trudged to City council meetings to save the Farm. Council Members turned their backs. No committee agreed to hear them. The Farmers mustered the support a dozen government agencies and non-profits, tens of thousands of supporters, hundreds of people risking their liberty to prevent eviction, but the City turned a deaf ear. The Farmers were never asked to join the negotiations with the foundations eager to keep the Farm alive. They have never been asked to help with the plans for a more environmentally friendly Los Angeles. As happens too often in this world, when the "big boys" entered the picture, the migrant farmers were shut out.

What is obvious now is that the City is still on a course to scrub the City of the South Central Farm, its legacy and its promise.

- In order to facilitate a proposed 2006 sale, a council member spread rumors of toxic soil to quell talk of restoring the Farm which, when tested prior to proposed development in 2013, proved to be a fabrication.

- The Council promised the Central Alameda neighborhood a soccer field and then took it away ostensibly because the industrial development would be too toxic for the soccer players (though apparently not for the surrounding neighborhood), but in fact because buyers didn't want to accommodate the children.

- In 2008 the Planning Commission issued a Mitigated Negative Declaration for industrial development, that, under scrutiny by the Farmers, turned out to require mitigation to such an extent that the potential buyer shut down the sale.

- In 2013, a consortium of buyers tried to resurrect virtually the same development plan under the transparent guise of four buildings instead of one. The Farmers proved their promise of jobs was illusory, mostly transfers from existing operations, and the plans were based on inaccurate mapping. Again the Farmers established the need for an Environmental Impact Report, but this time the Planning Commission allowed the consortium to skirt CEQA public hearings. The new EIR claims no regional impact on a plan that promises much the same damage as the first one, one that required a ramp from the I-10 to offset truck traffic among other impossible accommodations.

Misrepresentations at best, lies at worst, have propelled the City's frenzy to pave over the South Central Farm.

The South Central Farm was an environmental gem in one of the toughest and most environmentally devastated neighborhoods in Los Angeles. The Farm improved health for the residents with air scrubbed by the trees and food fresh from the soil, provided family recreation and learning, fostered community and cultural pride, and mitigated drug sales. Your predecessors chose to bulldoze that rather than celebrate the accomplishments of the people to grow something wonderful in the empty, industrially-zoned lots of their neighborhood, with an agricultural use permit (that has not been revoked) from the Harbor Department. The spate of community gardens, bike paths and trains, and farmers markets across the City since 2006 can all mark their beginning from the awareness the Farm brought to the greening of Los Angeles. If you determine to destroy that marker, you give the lie to all the City's subsequent environmental consciousness.

On the other hand, if you honor your predecessors' promise to the Central Alameda neighborhood, the Farmers, and the many L.A. residents who supported the Farm, if you grasp what was created with that permit, then you add value to the housing there, honor the immigrant communities of Los Angeles, grow a showcase of over one hundred native species, house a seed bank, provide habitat for wildlife, and can again claim to have one of the world's largest urban farms. That was the South Central Farm, the Farm that the City of Los Angeles saw fit to destroy for tax revenue, spitting in the eye of worldwide opposition. It is the Farm that will only re-emerge if you see your way past whatever perverse sentiment remains to punish the Farmers, the people of Central Alameda, and those who joined them for exposing the City's plans for industrializing a working class neighborhood's dignity.

Listen to the people of Central Alameda and Los Angeles one more time. We are not the experts the Planning Commission invited to comment. We can't measure the toxicity of more than two thousand truck trips through the narrow streets of Central Alameda, or the sleeplessness of 24-hour warehouse lighting bouncing into a neighborhood, or the property depreciation that results from the non-stop noise, or the economic impact of traffic congestion on the mom-and-pop businesses, or the number of "sensitive receptors"--people--who will be sickened. We are just people, the ones who know that we would not have that monstrous shrine to industrialization adjacent to our homes. Hear what you sacrificed when the City broke its promise for a few million dollars and a bit more in taxes. Hear from those who lost their labor and their garden plots. Hear how, for twenty years, the promise of the Farm has been remembered. Prove you are not the same Planning Commission, the same City Council, the same Mayor who destroyed the South Central Farm. Hold a CEQA scoping hearing, and invite us too.

Sincerely,
Leslie Radford

resident

From:	Srimal Hewawitharana
To:	Eric Charlton
Subject:	Fwd: SCF Letter in opposition to Case No. ENV-2012-920-EIR, AA-2012-919, DIR-2013-887-SPR/ Proposed Construction of Four Industrial Buildings
Date:	Wednesday, July 09, 2014 9:35:37 AM

---------- Forwarded message ----------
From: **Tezozomoc** <tezozomoc@hotmail.com>
Date: Tue, Jul 8, 2014 at 12:40 PM
Subject: SCF Letter in opposition to Case No. ENV-2012-920-EIR, AA-2012-919, DIR-2013-887-SPR/ Proposed Construction of Four Industrial Buildings
To: srimal.hewawitharana@lacity.org

Via E-mail w/ Attachments and US Mail w/Attachments

Srimal Hewawitharana
Environmental Specialist II
Department of City Planning
200 N. Main St. 7th Floor
Los Angeles, CA 90012
Via email: srimal.hewawitharana@lacity.org

Re: Case No. ENV-2012-920-EIR, AA-2012-919, DIR-2013-887-SPR/ Proposed Construction of Four Industrial Buildings

Dear Ms. Hewawitharana:

These comments are a call for an immediate rejection of the City's planners' present determination that this proposed project is not regional in scope and for immediately public comment scoping hearing under CEQA prior to evaluation of the applicant's EIR request.

Because the land at issue in the Proposed EIR, which is now open space and without current improvements, lies within and is adjacent to environmental, community, cultural and public transportation resources providing output on a daily basis, the applicant must face the highest level of scrutiny, which is a public scoping hearing to determine the extent to which the Proposed Project impedes, removes and replaces these current valuable resources.

The applicant and its' predecessor attempts at development on this site, have all be been subject to public and backroom inter-agency controversies.

A large community has established an existing pattern of usage of housing, employment, education, transportation and residential development.

The Proposed Project's issues of cummulative air quality impacts has a measureable affect on sensitive receptors. The LA County Dept. of Public Health has identified the impacts which exceed legal limits. By the metric of public health, this project is regional in scope, and impacts spread far beyond the boundaries of the Proposed Project.

The developer's proposed EIR must be put on hold and City Planning must schedule scoping hearings to hear out the opposition to this project from those affected by those inter-agency controversies.

In the strongest decent language possible, reject the applicants request for EIR review and comments and move to calendar a public scoping comments hearing to gather and evaluate data on the Proposed Project's ultimate cummulative impacts on housing, education, employment, transportation, and air quality, residential noise.

For City Planning to move toward a full Environmental Impact Report with an Environmental Justice Analysis is inadequate because of the widespread controversies between agencies, the public controversies over escalating pollution, and the need to answer to people adjacent to the Proposed Project to in the area of Martin Luther King Jr. Boulevard and Long Beach Avenue East, Los Angeles, California 90058.

The land upon which the Proposed Project sits should not be improved to any extent.

No development on the site of the South Central Farm shall be allowed, and the facts support my assertion.

Executive Summary

The owner/developer application EIR proposal is inadequate on several grounds: Scale of Project, Appropriateness of the Project, Realisticness of the Project, Owner/Developer Credibility and Legality of the Project.

Scale of [Proposed] Project is so large, and the impacts and take-aways would place additional stressors on a community adjacent to close to 14 contiguous acres of land in a highly dense, highly urbanized community within the 9th Council District.

The owner/developer is demanding the City provide multiple boundary-level easements, lot-line adjustments, waivers for sidewalk set backs and vacations of City land in an effort to unify the 15 separate parcels purchased by the owner/developer in 2012. The Revised and Recirculated Notice of Preparation Environmental Impact Report is an inappropriate avenue for the [Proposed] Project as the owner/developer's application requests waivers for height limit restrictions, calls for more than 400 parking spaces and for more than 2,000 daily truck trips of indeterminate tonnage, which has a regional significance /far beyond the intended scope or purpose of an EIR and will have a harmful impact on the surrounding community, which is already a Los Angeles injunction-subject toxic hot-spot of unrelenting oppression.

An EIR also ignores the City Planners who made a self-determination the applicant's Proposed Project has no regional impacts. It is unrealistic as the owner/developer's demands from the City for boundary-level lot-line adjustments, etc. have a disproportionate impact on the surrounding community of businesses, mass transit riders, schools, recreation center users and homes. These impacted parties are entitled to a full scoping review and not the rubber-stamping of a hasty, rock-bottom EIR. The owner/developer's credibility has come into question as differences are apparent between the language of the EIR application and the statements of the owner/developer's representatives. A mixed message has been put out regarding the exact number of buildings the owner/developer plans to build and the number of new living-wage jobs created by the construction of the [Proposed] Project. There are also factual inaccuracies in the owner/developer's EIR application as to the actual width of City streets Long Beach Boulevard East and 41st Street which are to the benefit of the owner/developer. These factual inaccuracies might also be based on a presumption the City will approve mergers of City land on the Proposed Project site, but in any event these choices increase significantly the complexity of the [Proposed] Project and the foreseeable impact it will have.

Lastly, cumulative industrial pollutants in the air, soil and groundwater which have daily impacted this community for years are already under several court and administrative orders arising from actions initiated by state and federal agencies. The application for an EIR to cover the additional industrial pollutants arising from [Proposed] Project raises more questions about regional impact than can be addressed with an EIR with Environmental Justice Analysis under CEQA. The EIR as proposed is legally insufficient to correct these cumulative pollution impacts and the current orders, rulings and laws presently in force in and along the Alamdeda Corridor are for the purpose of correcting the damage already done. In total, City Planning is ready to address the applicant's many requests of the City, but the [Proposed] Project offers insignificant mitigation, which is legally insufficient unless and until public scoping comments are heard at an open hearing under CEQA and the Brown Act.

Background

This comment is opposed to City Planning's attempt to by-pass a public scoping comments hearings, and believes there are many good reasons, any one of which is adequate, to demand a full, open, transparent hearing for the purpose of determining the cummulative impacts of the Proposed Project.

The most recent use of the [Proposed] Project site was agricultural. California agriculture pre-dates California written history, meaning the Mexican and Central-American Seed Bank which was taken and destroyed on or about June 13, 2006 at the Project site was a living link to California pre-history among the Mezo-American ancestors of today's indigenous Americans. The presence of the Seed Bank at the Project site is documented with historical facts surrounding the police action to eject the South-Central Farmers. The Project site is a place where the historical record is not yet closed.

Many species of plants and animals lived at the Seed Bank, now the entirety of the [Proposed] Project Site. The habitats for the plants and animals were destroyed along with the Seed Bank on June 13, 2006 in an action by the LAPD and subsequent bulldozing. Habitat recovery permitting the plant and animal growth since June 13, 2006 has been made impossible with continual disking by a tractor on the grounds of the Project site.

Plant habitats once lost are difficult to restore and the [Proposed] Project is solely in the City's interests in growth, which as planned under the owner/developer's MND application, guarantees that no plant growth could ever return to the habitat lost June 13, 2006.

A guava tree was known to be growing prior to the most recent disking, although at present the guava tree's whereabouts are uncertain. Native birds and resident small mammals, possibly including a bat, as well as common and beneficial insects also had a documented presence.

The Planning Department's Standard of Review

In determining whether an effect will be adverse or beneficial, the City shall consider the views held by members of the public in all areas affected as expressed in the whole record before the lead agency. Before requiring the preparation of an EIR, the City must still determine whether environmental change itself might be substantial, and if so, holding a public hearing for public comments about the impact of the Proposed Project.

In evaluating the significance of the environmental effect of a project, the City shall consider direct physical changes in the environment which may be caused by the project and reasonably foreseeable indirect physical changes in the environment which may be caused by the project.

A direct physical change in the environment is a physical change in the environment which is caused by and immediately related to the project. An examples of direct physical changes in the environment are the dust, noise, and traffic of heavy equipment that would result from construction of a new sewage treatment plant and possible odors from operation of the plant.

An indirect physical change in the environment is a physical change in the environment which is not immediately related to the project, but which is caused indirectly by the project. If a direct physical change in the environment in turn causes another change in the environment, then the other change is an indirect physical change in the environment. For example, the construction of a new sewage treatment plant may facilitate population growth in the service area due to the increase in sewage treatment capacity, but may then lead to an increase in air pollution as a result from population growth in the new sewage treatment service area.

Economic or social changes may be used to determine that a physical change shall be regarded as a significant effect on the environment. Where a physical change is

caused by economic or social effects of a project, the physical change may be regarded as a significant effect in the same manner as any other physical change resulting from the project. Alternatively, economic and social effects of a physical change may be used to determine that the physical change is a significant effect on the environment. If the physical change causes adverse economic or social effects on people, those adverse effects may be used as a factor in determining whether the physical change is significant. For example, if a project would cause overcrowding of a public facility (like a toilet) and the overcrowding causes an adverse effect on people, the overcrowding would be regarded as a significant effect.

The owner/developer's EIR Application Will Convert Unique Farmland of Statewide Importance.

The City of Los Angeles and L.A. City's Port Authority recognized the Project site as farmland since they issued "Permit 94" to further certify the earlier agreement to allow an agricultural focus at this site. Permit 94 has never been altered, thus there is a map that this area was permitted to be agricultural land. Until June 13, 2006, the site was likely the most unique farm of any size in the USA and may well have been the most biologically diverse due to the wide range of traditional food and medicinal crops being grown including crops grown from rare heirloom seeds from Latin America. Endangered species such as the Red-tailed hawk were photographed on the site prior to June 13, 2006.

At this time, I have no confirmation that Los Angeles Unified School District ("LAUSD") was informed about the [Proposed] Project before the Department of City Planning's June 13, 2013 hearing. I am aware of no comments back from LAUSD. LAUSD is entrusted with the health of its students, teachers and staff, and an absence of comment from such an interested party as LAUSD does imply the District has not yet prepared a comment, given the vast reach of the Project. As this comment will show, LAUSD and others will be impacted by the City's planned growth, so widespread is the human and species habitat impact of the Project.

The explanation for caution and a scoping hearing for public comments is that the [Proposed] Project is designed to only remain for a definite number of years. Once built, everything on the [Proposed] Project site will be lost with no hope of recovery. What came before on the [Proposed] Project was a Seed Bank, which held the agricultural and horticultural genetic transmissions from Mexico and Central-America. The Project is on a site where many thousands of persons in the neighborhood are forced each day to compete with the [Proposed] Project for water, air, shelter and sustenance. The Vernon Avenue Blue Line Station averages 5,200 passengers each day, with over 250,000 passengers riding the Blue Line annually. Traffic patterns account for over 10,000 car trips a day through the area, and the surrounding community consists of a public recreation center (The Arthur K. Snyder City Recreation Center) and an LAUSD high school, Jefferson High. Pedestrian traffic is constant throughout every day as bus and the Blue Line bring persons into the region for jobs, school, and recreation.

The determination of whether a project may have a significant effect on the environment calls for careful judgment on the part of the City, based to the extent possible on scientific and factual data. An ironclad definition of significant effect is not always possible because the significance of an activity may vary with the setting. For example, an activity which may not be significant in an urban area may be significant in a rural area. In this situation where having a truck depot may not have significant effect in the middle of a pasture, in the middle of an occupied City, the Project represents a degradation of the environment, threatening human health and the Project site with an irrevocable commitment of resources.

The upcoming Department of City Planning ruling on the applicant's EIR is premature because it does not address that City Planning planners made a determination the Proposed Project is not regional in scope. If the owner's disclosures to the Department of City Planning or the Zoning Administrator lacks adequate credibility, the Department of City Planning must first hold a scoping hearing for public comments before evaluating the applicant's EIR.

Owner's 2008 Application for MND

The applicant's presentation included drawings of a series of 46 foot-high buildings. The overly tall buildings will prevent existing light and air from reaching the land and community, eliminating a vital resource necessary for persons on the ground.

The environmental documentation indicates that the applicant's proposal would generate an additional 2,581 truck trips a day, which is a region-wide impact on traffic, air and noise pollution and on a wide-range of sensitive receptors.

From:	Srimal Hewawitharana
To:	Eric Charlton
Subject:	Fwd: Case No. ENV-2012-920-EIR, AA-2012-919, DIR-2013-887-SPR/ Proposed Construction of Four Industrial Buildings
Date:	Tuesday, July 15, 2014 8:55:47 AM

---------- Forwarded message ----------
From: **Gillian Ware** <gillian_ware@mac.com>
Date: Mon, Jul 14, 2014 at 10:42 PM
Subject: Re: Case No. ENV-2012-920-EIR, AA-2012-919, DIR-2013-887-SPR/ Proposed Construction of Four Industrial Buildings
To: srimal.hewawitharana@lacity.org

Re: Case No. ENV-2012-920-EIR, AA-2012-919, DIR-2013-887-SPR/ Proposed Construction of Four Industrial Buildings

Dear Ms. Hewawitharana:

I urge a rejection of the City's planners' present determination that this proposed project is not regional in scope. I urge you to call for an immediate public comment scoping hearing under CEQA prior to evaluation of the applicant's EIR request.

The environmental documentation indicates that the applicant's proposal would generate an additional 2,581 truck trips a day, which is a region-wide impact on traffic, air and noise pollution and on a wide-range of neighboring sensitive receptors.

- The trucks will contribute substantially to noise pollution in a neighborhood that already suffers with the noise of hourly train traffic along the Blue Line and approximately 10,000 car trips and day.

- Twenty-four hour shipping operations will require twenty-four hour lighting, a significant reduction in the quality of life for the neighborhood.

- As replacement facilities for existing business operations, this project holds little hope for any meaningful new jobs.

Siting warehouses on the land is to continue to deprive the community of their urban agricultural resource and means of self sufficiency to combat the effects of the local food desert which this area has become. To approve of placing corporate profits above community needs, in an extremely low income community where most residents are people of color, is to sanction environmental racism.

Cumulative industrial pollutants in the air, soil and groundwater which have daily impacted this community for years are already under several court and administrative orders arising from actions initiated by state and federal agencies. The application for an EIR to cover the additional industrial pollutants arising from [Proposed] Project raises more questions about regional impact than can be addressed with just an EIR with Environmental Justice

Analysis under CEQA. The EIR as proposed is legally insufficient to correct these cumulative pollution impacts and the current orders, rulings and laws presently in force in and along the Alameda Corridor are for the purpose of correcting the damage already done. In total, City Planning is ready to address the applicant's many requests of the City, but the [Proposed] Project offers insignificant mitigation, which is legally insufficient unless and until public scoping comments are heard at an open hearing under CEQA and the Brown Act.

For these and other reasons, I urge the City to hold a full scoping hearing of the Draft EIR regarding this project at 4051 South Alameda St., case number: ENV-2012-920-EIR, AA-2012-919-PMLA, DIR-2013-887-SPR.

Sincerely,

Gillian Ware
9039 Cattaraugus Avenue
Los Angeles
CA 90034

V. MITIGATION MONITORING PLAN

A. INTRODUCTION

The mitigation monitoring plan (MMP) contained herein satisfies the requirements of CEQA pursuant to Section 15097(a) of the State CEQA Guidelines as they relate to the EIR for the project.

The project was designed to avoid impacts through the incorporation of certain design features such as landscape, lighting, and street widening, thus supporting determinations of no impact or less than significant impact for certain environmental resources. The project characteristics from Section III, *Project Description*, of the Draft EIR have therefore been included in this MMP to ensure that the project is designed, constructed, operated, and maintained consistent with the project as evaluated in the EIR.

B. MMP

The EIR identifies mitigation measures that have been incorporated into the project to avoid, reduce, and mitigate significant impacts for the project. Mitigation measures were provided for the following issue areas: air quality, cultural resources, transportation/traffic, and utilities and service systems.

This MMP has been designed to ensure compliance with mitigation measures, defined in the EIR, during construction, operation, and maintenance of the project. This MMP would be adopted by the City of Los Angeles (City). Table V.C-1, *Mitigation Monitoring Plan for the 4051 South Alameda Street Project*, lists those mitigation measures required by the City to mitigate, reduce, or avoid significant impacts anticipated in association with the EIR project description. As the Lead Agency for the project, it shall be the responsibility of the City to administer and implement the MMP by imposing the requirements of the mitigation measures throughout the implementation of the project. The Applicant shall be obligated to provide documentation concerning implementation of the listed mitigation measures to the appropriate monitoring agency and the appropriate enforcement agency as provided for herein.

After review and approval of the final MMP by the Lead Agency, minor changes and modifications to the MMP are permitted, but can only be made by the Applicant or its successors subject to the approval by the City of Los Angeles. The Lead Agency, in conjunction with any appropriate agencies or departments, will determine the adequacy of any proposed change or modification. The flexibility is necessary in light of the nature of the MMP, and the need to protect the environment with a workable program. No changes will be permitted unless the MMP continues to satisfy the requirements of CEQA, as determined by the Lead Agency.

The Monitoring Program element of the MMP describes each required mitigation measure organized by impact area, with an accompanying delineation of the following:

- The Enforcement Agency (the agency with the power to enforce the mitigation measure)
- The Monitoring Agency (the agency to whom the reports are made)
- The period of the project during which implementation of the mitigation measure is to be monitored
    - Pre-Construction, including the design phase
    - Construction

  - Pre-Occupancy (prior to issuance of a Certificate of Occupancy)
  - Occupancy (post-construction)
- Monitoring Frequency (the frequency at which the Mitigation Measure shall be monitored)
- Action Indicating Compliance (the action of which the Enforcement or Monitoring Agency indicates that compliance with the required Mitigation Measure has been implemented)

As the indicated mitigation measures are completed, the Monitoring Agency will sign and date the MMP to indicate that the required mitigation measure has been completed for the subject period. The Monitoring Agency will also note the documentation (title of the monitoring report) that was submitted for each mitigation measure to indicate compliance and implementation.

MITIGATION MEASURES AND IMPLEMENTATION

Aesthetics

Mitigation Measures

No mitigation measures are required for Aesthetics.

Agriculture and Forestry Resources

Mitigation Measures

No mitigation measures are required for Agriculture and Forestry Resources.

Air Quality

Mitigation Measures

MM-Air-1: During the construction phase of the project, the project applicant shall apply soil stabilizers for all unpaved roads (80 percent reduction in PM2.5 and PM10 emissions).

Enforcement Agency: SCAQMD; Los Angeles Department of Building and Safety

Monitoring Agency: Los Angeles Department of Building and Safety

Monitoring Period: Preconstruction and construction

Monitoring Frequency: Periodic field inspections during construction

Action Indicating Compliance: Field inspection sign-off; Compliance certification report by project contractor

MM-Air-2: During the construction phase of the project, the project applicant shall water exposed areas three times a day (61 percent reduction in $PM_{2.5}$ and PM_{10} emissions).

Enforcement Agency: SCAQMD; Los Angeles Department of Building and Safety

Monitoring Agency: Los Angeles Department of Building and Safety

Monitoring Period: Construction

Monitoring Frequency: Periodic field inspections during construction

Action Indicating Compliance: Field inspection sign-off; Compliance certification report by project contractor

MM-Air-3: During the construction phase of the project, the project applicant shall ensure that vehicular speeds are reduced to 15 miles per hour on unpaved roads.

Enforcement Agency: Los Angeles Department of Building and Safety

Monitoring Agency: Los Angeles Department of Building and Safety

Monitoring Period: Construction

Monitoring Frequency: Periodic field inspections during construction

Action Indicating Compliance: Field inspection sign-off; Compliance certification report by project contractor

MM-Air-4: The project applicant shall establish incentives for increased transit frequency, in compliance with the transportation demand management and trip reduction measures set forth in Section 12.26J of the Los Angeles Municipal Code, which include the following requirements for non-residential projects with more than 100,000 square feet of floor area.

(a) Development in excess of 25,000 square feet of gross floor area. The owner shall provide a bulletin board, display case, or kiosk (displaying transportation information) where the greatest number of employees are likely to see it. The transportation information displayed should include, but is not limited to, the following:

(1) Current routes and schedules for public transit serving the site;

(2) Telephone numbers for referrals on transportation information including numbers for the regional ridesharing agency and local transit operations;

(3) Ridesharing promotion material supplied by commuter-oriented organizations;

(4) Regional/local bicycle route and facility information;

(5) A listing of on-site services or facilities which are available for carpoolers, vanpoolers, bicyclists, and transit riders.

(b) Development in excess of 50,000 square feet of gross floor area. The owner shall comply with Paragraph (a) above and in addition shall provide:

(1) A designated parking area for employee carpools and vanpools as close as practical to the main pedestrian entrance(s) of the building(s). This area shall include at least ten percent of the parking spaces required for the site. The spaces shall be signed and striped sufficient to meet the employee demand for such spaces. The

carpool/vanpool parking area shall be identified on the driveway and circulation plan upon application for a building permit;

(2) One permanent, clearly identified (signed and striped) carpool/vanpool parking space for the first 50,000 to 100,000 square feet of gross floor area and one additional permanent, clearly identified (signed and striped) carpool/vanpool parking space for any development over 100,000 square feet of gross floor area;

(3) Parking spaces clearly identified (signed and striped) shall be provided in the designated carpool/vanpool parking area at any time during the building's occupancy sufficient to meet employee demand for such spaces. Absent such demand, parking spaces within the designated carpool/vanpool parking area may be used by other vehicles;

(4) No signed and striped parking spaces for carpool/vanpool parking shall displace any handicapped parking;

(5) A statement that preferential carpool/vanpool spaces are available on-site and a description of the method for obtaining permission to use such spaces shall be included on the required transportation information board;

(6) A minimum vertical clearance of 7 feet 2 inches shall be provided for all parking spaces and accessways used by vanpool vehicles when located within a parking structure;

(7) Bicycle parking shall be provided in conformance with Section 12.21A16 of this Code.

(c) Development in excess of 100,000 square feet of gross floor area. The owner shall comply with Paragraphs (a) and (b) above and shall provide:

(1) A safe and convenient area in which carpool/vanpool vehicles may load and unload passengers other than in their assigned parking area;

(2) Sidewalks or other designated pathways following direct and safe routes from the external pedestrian circulation system to each building in the development;

(3) If determined necessary by the City to mitigate the project impact, bus stop improvements shall be provided. The City will consult with the local bus service providers in determining appropriate improvements. When locating bus stops and/or planning building entrances, entrances shall be designed to provide safe and efficient access to nearby transit stations/stops;

(4) Safe and convenient access from the external circulation system to bicycle parking facilities on-site.

Enforcement Agency: Los Angeles Department of Building and Safety; Los Angeles Department of Transportation

Monitoring Agency: Los Angeles Department of Building and Safety; Los Angeles Department of Transportation

Monitoring Period: Pre-occupancy

Monitoring Frequency: One-time prior to occupancy

Action Indicating Compliance: Compliance certification report by project contractor

MM-Air-5: The project applicant shall improve the pedestrian network for the project site to internally link all uses and connect with existing or planned external streets and pedestrian facilities contiguous with the project site. The project applicant shall identify street trees and streetscape improvements to connect site access points to nearby transit and bicycle facilities.

Enforcement Agency:, Los Angeles Department of Transportation; Los Angeles Department of Public Works

Monitoring Agency: Los Angeles Department of Transportation; Los Angeles Department of Public Works

Monitoring Period: Preconstruction

Monitoring Frequency: One-time prior to construction

Action Indicating Compliance: LADOT Approval; Public Works approval

MM-Air-6: The project applicant shall provide traffic calming measures through street improvements. The applicant will be dedicating additional right-of-way along 41st Street, Alameda Street, and Martin Luther King, Jr. Boulevard. In connection with the street dedications and development of the proposed project, the applicant will be upgrading existing sidewalks, curb and gutter, as well as street trees, street lighting, and street furniture around the entire perimeter of the property in consultation with the City Department of Transportation and Department of Public Works. Upgrades to the existing sidewalks will require new curb cuts and crosswalks and the replacement of existing traffic signals at intersections. Additional traffic control devices will be installed as necessary and required to facilitate safe traffic circulation in and around the proposed project site.

Enforcement Agency: Los Angeles Department of Transportation; Los Angeles Department of Public Works

Monitoring Agency: Los Angeles Department of Transportation; Los Angeles Department of Public Works

Monitoring Period: Preconstruction

Monitoring Frequency: One-time prior to construction

Action Indicating Compliance: LADOT approval; Public Works approval

MM-Air-7: The project applicant shall ensure low VOC paint is applied for interior and exterior uses [250 EF (g/L)].

Enforcement Agency: SCAQMD; Los Angeles Department of Building and Safety

Monitoring Agency: Los Angeles Department of Building and Safety

Monitoring Period: Preconstruction and construction

Monitoring Frequency: Periodic field inspections during construction

Action Indicating Compliance: Plans and Specifications; Field inspection sign-off; Compliance certification report by project contractor

Biological Resources

Mitigation Measures

No mitigation measures are required for Biological Resources.

Cultural Resources

Mitigation Measures

MM-Cult-1: The impacts to cultural resources related directly or indirectly to the destruction of a unique paleontological resource from the proposed project shall be reduced to below the level of significance through the salvage and disposition of paleontological resources that result from all earthmoving activities involving disturbances of the older Quaternary Alluvium. Ground-disturbing activities, including, but not limited to, drilling, excavation, and trenching, greater than five feet of the surface have the potential to uncover significant vertebrate fossil remains. For this reason, the following is required as part of Mitigation Measure Cultural-1 to reduce the level of impacts regarding the destruction of a unique paleontological resource below the level of significance:

- Prior to any ground-disturbing activities, the Applicant shall be responsible for creating a site plan that indicates all locations of ground-disturbing activities that affect previously undisturbed native soils in areas located 5 feet below the ground surface or further and have the potential to contact older Quaternary Alluvium.

- A qualified paleontologist, as defined by the Society of Vertebrate Paleontology's Impact Mitigation Guidelines, shall be retained to implement a monitoring and recovery program in any locations of ground-disturbing activities that affect previously undisturbed native soils in areas located 5 feet below the ground surface or further and have the potential to contact older Quaternary Alluvium.[1]

- Paleontological Resources Sensitivity Training shall be required for all project personnel prior to the start of ground-disturbing activities. This shall include a brief field training that would provide an overview of fossils that might potentially be found, and the appropriate procedures to follow if fossils are identified.

[1] Society of Vertebrate Paleontology. "Conformable Impact Mitigation Guidelines." Available at: http://vertpaleo.org/The-Society/Governance-Documents/Conformable-Impact-Mitigation-Guidelines-Committee.aspx

- Construction monitoring by a qualified paleontological monitor shall be implemented during all ground-disturbing activities that affect previously undisturbed native soils in areas located 5 feet below the ground surface or further and have the potential to contact older Quaternary Alluvium. Should a potentially unique paleontological resource be encountered, ground-disturbing activities within 100 feet shall cease until a qualified paleontologist assesses the find.

- If fossil localities are discovered, the paleontologist shall assess the find and proceed accordingly. This includes the controlled collection of fossil and geologic samples for processing.

- Daily logs shall be kept by the qualified paleontological monitor during all monitoring activities. The daily monitoring log shall be keyed to a location map to indicate the area monitored, the date, and assigned personnel. In addition, this log shall include information of the type of rock encountered, fossil specimens recovered, and associated specimen data.

- All significant specimens collected shall be appropriately prepared, identified, and catalogued prior to their placement in a permanent accredited repository. The qualified paleontologist shall be required to secure a written agreement with a recognized repository, regarding the final disposition, permanent storage, and maintenance of any significant fossil remains and associated specimen data and corresponding geologic and geographic site data that might be recovered as a result of the specified monitoring program. The written agreement shall specify the level of treatment (i.e., preparation, identification, curation, cataloguing, etc.) required before the fossil collection would be accepted for storage. In addition, a technical report shall be completed.

- Within 90 days of the completion of any salvage operation or monitoring activities, a mitigation report shall be submitted to the City of Los Angeles with an appended, itemized inventory of the specimens. The report and inventory, when submitted to the City of Los Angeles, signify the completion of the program to mitigate impacts to paleontological resources.

Enforcement Agency: Los Angeles Department of Building and Safety; Los Angeles Department of City Planning

Monitoring Agency: Los Angeles Department of Building and Safety

Monitoring Period: Construction

Monitoring Frequency: At time of resource discovery, should it occur

Action Indicating Compliance: If no unanticipated discoveries are found and grading occurs within the older Quaternary Alluvium, compliance certification report by a qualified paleontologist; if unanticipated discoveries are found, submittal of a report and mitigation plan(s) by a qualified paleontologist.

MM-Cult-2: The impacts to cultural resources related to a substantial adverse change in the significance of an archaeological resource shall be reduced to below the level of significance through the identification and recordation of archaeological resources that result from all earthmoving activities that affect previously undisturbed native soils. Ground-disturbing activities, including, but not limited to, drilling, excavation, and trenching, have the potential to uncover significant archaeological resources. For this reason, the following is required as part of Mitigation Measure Cultural-2 to reduce the level of impacts regarding a substantial adverse change in the significance of an archaeological resource below the level of significance:

- Prior to any ground-disturbing activities, the Applicant shall be responsible for creating a site plan that indicates all locations of ground-disturbing activities that affect previously undisturbed native soils.

- A qualified archaeologist shall be retained to implement a monitoring and recovery program in any area identified as having the potential to contain cultural resources.

- Cultural Resources Sensitivity Training shall be required for all project personnel prior to the start of ground-disturbing activities. This shall include a brief field training that would provide an overview of resources that might potentially be found, and the appropriate procedures to follow if cultural resources are identified.

- Construction monitoring by a qualified archaeological monitor shall be implemented during all ground-disturbing activities. Should a potential cultural resource be encountered, ground-disturbing activities within 100 feet shall cease until a qualified archaeologist assesses the find.

- If cultural resources are discovered, the archaeologist shall assess the find and proceed accordingly. This includes the controlled collection of cultural materials for laboratory identification.

- Daily logs shall be kept by the qualified archaeological monitor during all monitoring activities. The daily monitoring logs keyed to a location map to indicate the area monitored, the date, assigned personnel, and the results of monitoring, including the recovery of archaeological material, sketches of recovered materials, and associated geographic site data. Within 90 days of the completion of the archaeological monitoring, a monitoring report shall be submitted to the City of Los Angeles and to SCCIC at California State University, Fullerton.

- All significant artifacts collected shall be appropriately prepared, identified, and catalogued prior to their placement in a permanent accredited repository. The qualified archaeologist shall be required to secure a written agreement with a recognized repository, regarding the final disposition, permanent storage, and maintenance of any significant cultural resources. The written agreement shall specify the level of treatment (i.e., preparation, identification, curation, cataloguing, etc.) required before the cultural resource collection would be accepted for storage. In addition, a technical report shall be completed.

- Within 90 days of the completion of any salvage operation or monitoring activities, a mitigation report shall be submitted to the City of Los Angeles with an appended, itemized inventory of the artifacts. The report and inventory, when submitted to the City of Los Angeles, shall signify the completion of the program to mitigate impacts to archaeological resources.

Enforcement Agency: Los Angeles Department of Building and Safety; Los Angeles Department of City Planning

Monitoring Agency: Los Angeles Department of Building and Safety

Monitoring Period: Construction

Monitoring Frequency: Periodic per recommendations of archaeological monitor.

Action Indicating Compliance: If archaeological resource are unearthed, submittal of compliance certification report and treatment plan by a qualified archaeological monitor.

Geology and Soils

Mitigation Measures

No mitigation measures are required for Geology and Soils.

Greenhouse Gas Emissions

Mitigation Measures

No mitigation measures are required for Greenhouse Gas Emissions.

Hazards and Hazardous Materials

Mitigation Measures

No mitigation measures are required for Hazards and Hazardous Materials.

Hydrology and Water Quality

Mitigation Measures

No mitigation measures are required for Hydrology and Water Quality.

Land Use and Planning

Mitigation Measures

No mitigation measures are required for Land Use and Planning.

Mineral Resources

Mitigation Measures

No mitigation measures are required for Mineral Resources.

Noise

Mitigation Measures

No mitigation measures are required for Noise.

Population and Housing

Mitigation Measures

No mitigation measures are required for Population and Housing.

Public Services

Mitigation Measures

No mitigation measures are required for Public Services.

Recreation

Mitigation Measures

No mitigation measures are required for Recreation.

Transportation and Traffic

MM-Traffic-1: A construction work site control plan shall be submitted to the City of Los Angeles Department of Transportation (LADOT) for review and approval prior to the start of any construction work. The plan shall show the location of any roadway or sidewalk closures, traffic detours, haul routes, hours of operations, protective devices, warning signs and access to abutting properties.

Enforcement Agency: Los Angeles Department of Transportation

Monitoring Agency: Los Angeles Department of Transportation

Monitoring Period: Preconstruction; construction

Monitoring Frequency: Once, prior to issuance of building permit; Periodic field inspections during construction

Action Indicating Compliance: Approval from the Los Angeles Department of Transportation Prior to issuance of Building Permit (Pre-Construction); compliance certification report submitted by Project contractor (Construction)

MM-Traffic-2: All construction related traffic shall be restricted to off-peak hours.

Enforcement Agency: Los Angeles Department of Transportation

Monitoring Agency: Los Angeles Department of Transportation, Los Angeles Department of Building and Safety

Monitoring Period: Construction

Monitoring Frequency: Periodic field inspections

Action Indicating Compliance: Field inspection sign-off; Compliance certification report submitted by the Project Contractor

MM-Traffic-3: 41st Street shall be reclassified to a Collector Street. A Collector Street requires a 22-foot half-width roadway within a 32-foot half-width right-of-way.

Enforcement Agency: Los Angeles Department of Transportation; Department of Public Works; Department of City Planning

Monitoring Agency: Los Angeles Department of Transportation; Department of Public Works

Monitoring Period: Preconstruction

Monitoring Frequency: Once, at plan approval

Action Indicating Compliance: Sign-off on road construction plans

MM-Traffic-4: The project applicant shall provide the number of Code required parking spaces as specified by the Department of Building and Safety:

- Building 1 consists of a single story with a mezzanine that occupies approximately 115,973 total square feet and provides 123 parking spaces;
- Building 2 consists of two stories that occupy approximately 133,680 total square feet and provides 79 parking spaces;
- Building 3 consists of a single story with a mezzanine that occupies approximately 116,724 total square feet and provides 96 parking spaces; and
- Building 4 consists of a single story with a mezzanine that occupies approximately 113,743 total square feet and provides 106 parking spaces.

Enforcement Agency: Los Angeles Department of Transportation; Department of Public Works; Los Angeles Department of Building and Safety

Monitoring Agency: Los Angeles Department of Building and Safety;

Monitoring Period: Preconstruction and construction

Monitoring Frequency: Once at plan approval; once at field inspection of completed construction work

Action Indicating Compliance: Sign-off on construction plans; Sign-off on completed construction work

MM-Traffic-5: All driveways shall be Case 2 driveways and 30 feet and 18 feet wide for two-way and one-way operations, respectively.

Enforcement Agency: Los Angeles Department of Building and Safety; Los Angeles Bureau of Engineering; Los Angeles Department of Transportation

Monitoring Agency: Los Angeles Department of Building and Safety

Monitoring Period: Preconstruction and construction

Monitoring Frequency: Once at plan approval; once at field inspection of completed construction work

Action Indicating Compliance: Plans and Specifications; Sign-off on construction plans; Sign-off on completed construction work

Utilities and Service Systems

MM-Utilities-1: The project applicant shall either have further sewer system gauging obtained to identify a specific sewer connection point based on the capacity of the public sewer or build sewer lines to a point in the sewer system with sufficient capacity if the public sewer has insufficient capacity.

Enforcement Agency: Los Angeles Department of Building and Safety; Los Angeles Department of Public Works Bureau of Sanitation

Monitoring Agency: Los Angeles Department of Building and Safety; Los Angeles Department of Public Works Bureau of Sanitation

Monitoring Period: Construction; Operation

Monitoring Frequency: Once prior to final certificate of occupancy; annually during first three years of operation

Action Indicating Compliance: Plans and Specifications

APPENDIX A

COMMENT LETTERS ON THE DRAFT EIR

DEPARTMENT OF TRANSPORTATION
DISTRICT 7-OFFICE OF TRANSPORTATION PLANNING
100 S. MAIN STREET, MS 16
LOS ANGELES, CA 90012
PHONE (213) 897-9140
FAX (213) 897-1337
www.dot.ca.gov

Serious drought.
Help save water!

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CITY OF LOS ANGELES
FEB 25 2015
ENVIRONMENTAL
UNIT

February 19, 2015

Ms. Srimal Hewawitharana
City of Los Angeles
200 North Spring Street, Room 750
Los Angeles, CA 90012

RE: 4051 South Alameda Street Project
Vic. LA-10/ PM 17.122
SCH # 2014061030
Ref. IGR/CEQA No. 140621AL-NOP
IGR/CEQA No. 150141AL-DEIR

Dear Ms. Hewawitharana:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The proposed project includes the construction of a new industrial park consisting of four warehousing facility buildings totaling 480,000 square feet gross floor area including ancillary office spaces.

Attached please find Caltrans letter prepared on July 14, 2014. In the Draft Environmental Impact Report (DEIR) prepared in January 2015 and in the Appendix IS-5 Traffic Impact Study (TIS) prepared on September 26, 2012, Caltrans traffic concerns have not been addressed. B1-1

Again, the TIS did not include a traffic analysis of the State's highway facilities. There are 1,021/171 AM/PM cumulative peak hour trips. In addition, the SOLA Village Project, a mixed use project consisting of 2.53 million square feet of development, is a few blocks away from the project site. Based on the size of the both of these projects, a significant cumulative traffic impact to the State facilities may occur. B1-2 B1-3

As a reminder, in Caltrans' Guide "The level of service (LOS) for operating State highway facilities is based upon measures of effectiveness (MOEs). Caltrans endeavors to maintain a target LOS at the transition between LOS 'C' and LOS 'D' on State highway facilities. If an existing State highway facility is operating at less than the appropriate target LOS, the existing MOE should be maintained." The existing LOS on the freeway should be disclosed regardless of how many trips will be assigned to the highway. Currently the LOS on I-10 and I-110 are B1-4

operating at or near capacity during peak hours. Additional vehicle trips from the project or related projects may contribute significant impacts to the I-10 and I-110. The decision makers should be aware of this issue and be prepared to mitigate cumulative traffic impacts in the future. B1-4 Cnt'd

In the spirit of mutual cooperation, we encourage the City to work with Caltrans in an effort to evaluate traffic impacts, identify potential improvements, and establish a funding mechanism that helps mitigate cumulative transportation impacts in the area. B1-5

If you have any questions, please feel free to contact Alan Lin the project coordinator at (213) 897-8391 and refer to IGR/CEQA No. 150141AL-DEIR.

Sincerely,

Rick Holland

RICK HOLLAND
Acting Branch Chief
Community Planning & LD / IGR Review

cc: Scott Morgan, State Clearinghouse

LETTER B2

Department of Toxic Substances Control

Matthew Rodriquez
Secretary for
Environmental Protection

Barbara A. Lee, Director
9211 Oakdale Avenue
Chatsworth, California 91311

Edmund G. Brown Jr.
Governor

March 5, 2015

Srimal Hewawitharana
Project Coordinator
EIR Unit
Environmental Analysis section
Los Angeles City Planning Department
200 N Spring Street, Room 750
Los Angeles, CA 90012

NOTICE OF COMPLETION AND AVAILABILITY OF DRAFT ENVIRONEMNTAL IMPACT REPORT FOR THE 4051 SOUTH ALAMEDA STREET PROJECT, ENV-2012-920-EIR, STATE CLEARINGHOUSE NUMBER 2014061030

Dear Ms. Hewawitharana:

The Department of Toxic Substances Control (DTSC) has received the Draft Environmental Impact Report (EIR) for the subject project.

The DTSC review of the Draft EIR revealed that Hazardous Substances are present at the subject project site. Based on this review the following are DTSC's comments: B2-1

1. During the Initial Study Phase, DTSC made comments indicating that concentrations of Hazardous Substances are present at the site. Property owners provided DTSC with various investigation reports confirming the presence of Hazardous Substances at the site. B2-2
2. DTSC did not receive oversight evidence of a Regulatory Agency making a determination that concentrations of hazardous substances do not require further action. B2-3
3. Regulatory Agency oversight and determination is required to clear this site for development.

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Based on the aforementioned comments a release of Hazardous Substances is present at the site. Any decision on required action for this release should be made by an authorized regulatory agency. This issue should be complied with prior to finalizing an EIR and it should be clearly stated in the EIR along with supporting documents. The EIR should identify how any required investigation and / or remediation will be conducted, and which government agency will provide oversight. B2-4

DTSC provides guidance for Preliminary Endangerment Assessment preparation and cleanup oversight through the Voluntary Cleanup Program (VCP). For additional information on the VCP please visit DTSC's website at www.dtsc.ca.gov. B2-5

If you have any further questions, please contact me at (818) 717-6538.

Sincerely,

Haissam Y. Salloum, P.E.
Senior Engineer
Brownfields and Environmental Restoration Program – Chatsworth Office

cc: Governor's office of Planning and Research
State Clearinghouse
P.O. Box 3044
Sacramento, California 95812-3044

Ms. Kathie Schievelbein, Chief
Office of Planning and Environmental Analysis
Department of Toxic Substances Control
P.O. Box 806
Sacramento, California 95812-0806

STATE OF CALIFORNIA EDMUND G. BROWN JR., *Governor*

PUBLIC UTILITIES COMMISSION
320 WEST 4TH STREET, SUITE 500
LOS ANGELES, CA 90013

March 27, 2014

Srimal Hewawitharana
City of Los Angeles
200 North Spring Street, Room 750
Los Angeles CA, 90012

Re: SCH 2014061030 – Los Angeles 4051 South Alameda Street Project - DEIR

Dear Ms. Hewawitharana:

The California Public Utilities Commission (Commission) has jurisdiction over the safety of highway-rail crossings (crossings) in California. The California Public Utilities Code requires Commission approval for the construction or alteration of crossings and grants the Commission exclusive power on the design, alteration and closure of crossings. The Commission's Rail Crossings Engineering Branch (RCEB) is in receipt of the *Draft Environmental Impact Report (DEIR)* for the 4051 South Alameda Street project. The City of Los Angeles (City) is the lead agency.

The 41st Street at-grade crossing (ID: CPUC No. 001BBH-486.13 and DOT No. 747835D) and the 38th Place crossing (ID: CPUC No. 001BG-486.00 and DOT No. 747607R) are located immediately on the west and east sides of the project site respectively. Currently, there are over 100 combined light-rail and freight train movements per day at the 41st Street crossing, with a maximum speed of 30 miles per hour. B3-1

According to the DEIR, the proposed Industrial Park Warehouse project will generate approximately 342 truck trips per day. While the DEIR concludes that the additional traffic would not significantly affect the level of service of the key intersections in the surrounding roadway system, RCEB has concerns on whether the existing simultaneous preemption at the above crossings can adequately clear design vehicles off the tracks prior to train arrivals. RECB recommends the City to investigate current preemption operations at the two (2) crossing locations and implement appropriate safety mitigations if it is needed. Any development adjacent to or near the railroad right-of-way (ROW) should be planned with the safety of the rail corridor in mind. B3-2

Modification to an existing public rail crossing requires authorization from the Commission. RCEB representatives are available for consultation on any potential safety impacts or concerns at crossings. Please continue to keep RCEB informed of the project's development. More information can be found at: http://www.cpuc.ca.gov/PUC/safety/Rail/Crossings/index.htm. B3-3

If you have any questions, please contact Ken Chiang at (213) 576-7076 or Chi Cheung To at (213) 576-5766.

Sincerely,

Chi Cheung To, P.E.
Utilities Engineer
Rail Crossings Engineering Section
Safety and Enforcement Division

CC: State Clearinghouse, P.O. Box 3044, Sacramento, CA 95812-3044

LETTER B4

STATE OF CALIFORNIA

GOVERNOR'S OFFICE *of* PLANNING AND RESEARCH

STATE CLEARINGHOUSE AND PLANNING UNIT

EDMUND G. BROWN JR.
GOVERNOR

KEN ALEX
DIRECTOR

March 12, 2015

RECEIVED
CITY OF LOS ANGELES
MAR 23 2015
ENVIRONMENTAL
UNIT

Srimal Hewawitharana
City of Los Angeles
200 N. Spring Street, Room 750
Los Angeles, CA 90012

Subject: 4051 South Alameda Street Project
SCH#: 2014061030

Dear Srimal Hewawitharana:

The enclosed comment (s) on your Draft EIR was (were) received by the State Clearinghouse after the end of the state review period, which closed on March 6, 2015. We are forwarding these comments to you because they provide information or raise issues that should be addressed in your final environmental document.

B4-1

The California Environmental Quality Act does not require Lead Agencies to respond to late comments. However, we encourage you to incorporate these additional comments into your final environmental document and to consider them prior to taking final action on the proposed project.

Please contact the State Clearinghouse at (916) 445-0613 if you have any questions concerning the environmental review process. If you have a question regarding the above-named project, please refer to the ten-digit State Clearinghouse number (2014061030) when contacting this office.

Sincerely,

Scott Morgan
Director, State Clearinghouse

Enclosures
cc: Resources Agency

1400 10th Street P.O. Box 3044 Sacramento, California 95812-3044
(916) 445-0613 FAX (916) 323-3018 www.opr.ca.gov

LETTER B4

Department of Toxic Substances Control

Matthew Rodriquez
Secretary for
Environmental Protection

Barbara A. Lee, Director
9211 Oakdale Avenue
Chatsworth, California 91311

Edmund G. Brown Jr.
Governor

RECEIVED
MAR 12 2015
STATE CLEARING HOUSE

March 5, 2015

late 3/6/15 e

Srimal Hewawitharana
Project Coordinator
EIR Unit
Environmental Analysis section
Los Angeles City Planning Department
200 N Spring Street, Room 750
Los Angeles, CA 90012

NOTICE OF COMPLETION AND AVAILABILITY OF DRAFT ENVIRONEMNTAL IMPACT REPORT FOR THE 4051 SOUTH ALAMEDA STREET PROJECT, ENV-2012-920-EIR, STATE CLEARINGHOUSE NUMBER 2014061030

Dear Ms. Hewawitharana:

The Department of Toxic Substances Control (DTSC) has received the Draft Environmental Impact Report (EIR) for the subject project.

The DTSC review of the Draft EIR revealed that Hazardous Substances are present at the subject project site. Based on this review the following are DTSC's comments:

1. During the Initial Study Phase, DTSC made comments indicating that concentrations of Hazardous Substances are present at the site. Property owners provided DTSC with various investigation reports confirming the presence of Hazardous Substances at the site.

2. DTSC did not receive oversight evidence of a Regulatory Agency making a determination that concentrations of hazardous substances do not require further action.

3. Regulatory Agency oversight and determination is required to clear this site for development.

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Based on the aforementioned comments a release of Hazardous Substances is present at the site. Any decision on required action for this release should be made by an authorized regulatory agency. This issue should be complied with prior to finalizing an EIR and it should be clearly stated in the EIR along with supporting documents. The EIR should identify how any required investigation and / or remediation will be conducted, and which government agency will provide oversight.

DTSC provides guidance for Preliminary Endangerment Assessment preparation and cleanup oversight through the Voluntary Cleanup Program (VCP). For additional information on the VCP please visit DTSC's website at www.dtsc.ca.gov.

If you have any further questions, please contact me at (818) 717-6538.

Sincerely,

Haissam Y. Salloum, P.E.
Senior Engineer
Brownfields and Environmental Restoration Program – Chatsworth Office

cc: Governor's office of Planning and Research
State Clearinghouse
P.O. Box 3044
Sacramento, California 95812-3044

Ms. Kathie Schievelbein, Chief
Office of Planning and Environmental Analysis
Department of Toxic Substances Control
P.O. Box 806
Sacramento, California 95812-0806

LETTER B5

STATE OF CALIFORNIA

GOVERNOR'S OFFICE *of* PLANNING AND RESEARCH

STATE CLEARINGHOUSE AND PLANNING UNIT

EDMUND G. BROWN JR.
GOVERNOR

KEN ALEX
DIRECTOR

March 9, 2015

RECEIVED
CITY OF LOS ANGELES
MAR 23 2015
ENVIRONMENTAL
UNIT

Srimal Hewawitharana
City of Los Angeles
200 N. Spring Street, Room 750
Los Angeles, CA 90012

Subject: 4051 South Alameda Street Project
SCH#: 2014061030

Dear Srimal Hewawitharana:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on March 6, 2015, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

> "A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

B5-1

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Scott Morgan
Director, State Clearinghouse

Enclosures
cc: Resources Agency

1400 10th Street P.O. Box 3044 Sacramento, California 95812-3044
(916) 445-0613 FAX (916) 323-3018 www.opr.ca.gov

Document Details Report
State Clearinghouse Data Base

LETTER B5

SCH#	2014061030
Project Title	4051 South Alameda Street Project
Lead Agency	Los Angeles, City of

Type	EIR Draft EIR
Description	The proposed project includes the construction of a new industrial park consisting of four buildings. Building 1 consists of a single story with a mezzanine that occupies approximately 115,973 total sf and provides 124 parking spaces; Building 2 consists of two stories that occupy approximately 133,680 total sf and provides 72 parking spaces; Building 3 consists of a single story with a mezzanine that occupies approximately 116,972 total sf and provides 97 parking spaces; and Building 4 consists of a single story with a mezzanine that occupies approximately 114,397 total sf and provides 75 parking spaces. In total, the proposed project would occupy approximately 365,945 sf of warehouse space, 85,181 sf of office space, and 29,896 sf of manufacturing space. The heights of each of the four buildings range from 37 feet to a maximum building height of 40 feet.

Lead Agency Contact

Name	Srimal Hewawitharana		
Agency	City of Los Angeles		
Phone	213 978 1359	*Fax*	
email			
Address	200 N. Spring Street, Room 750		
City	Los Angeles	*State* CA	*Zip* 90012

Project Location

County	Los Angeles
City	Los Angeles, City of
Region	
Lat / Long	34° 0' 31" N / 118° 14' 25" W
Cross Streets	Alameda Street and 40th Place
Parcel No.	5117-019-016-02, 020-029-040, 021

Township	*Range*	*Section*	*Base*

Proximity to:

Highways	Hwy 101
Airports	
Railways	Alameda Corridor / SPRR
Waterways	Los Angeles River
Schools	
Land Use	Z: M2-2 Light Industrial Zone

Project Issues	Toxic/Hazardous; Air Quality; Archaeologic-Historic; Economics/Jobs; Noise; Sewer Capacity; Solid Waste; Traffic/Circulation; Landuse; Cumulative Effects
Reviewing Agencies	Resources Agency; Department of Boating and Waterways; Department of Fish and Wildlife, Region 5; Office of Historic Preservation; Department of Parks and Recreation; Department of Water Resources; California Highway Patrol; Caltrans, District 7; Air Resources Board, Major Industrial Projects; Regional Water Quality Control Board, Region 4; Department of Toxic Substances Control; Native American Heritage Commission; Public Utilities Commission

Date Received	01/21/2015	*Start of Review*	01/21/2015	*End of Review*	03/06/2015

Note: Blanks in data fields result from insufficient information provided by lead agency.

LETTER D1

From: Srimal Hewawitharana
To: Eric Charlton
Subject: Fwd: Draft EIR for 4051 S. Alameda St. - Comments on Water Supply Section by LADWP
Date: Thursday, March 05, 2015 12:07:47 PM
Attachments: 4051 South Alameda Request for Comments.pdf

---------- Forwarded message ----------
From: **Moosbrugger, Earl** <Earl.Moosbrugger@ladwp.com>
Date: Thu, Mar 5, 2015 at 10:07 AM
Subject: Draft EIR for 4051 S. Alameda St. - Comments on Water Supply Section by LADWP
To: "srimal.hewawitharana@lacity.org" <srimal.hewawitharana@lacity.org>
Cc: "Holloway, Chuck" <Charles.Holloway@ladwp.com>, "Parker, Nadia" <Nadia.Parker@ladwp.com>, "Eatinger, Stephanie" <Stephanie.Eatinger@ladwp.com>, "Kwan, Delon" <Delon.Kwan@ladwp.com>, "Nikolajevs, Val" <Val.Nikolajevs@ladwp.com>

Hello Srimal Hewawitharana,

We are submitting to you the following comments to the Draft Environmental Impact Report (DEIR) for the 4051 South Alameda Street Project (City Case No. ENV-2012-920-EIR; State Clearinghouse No. 2014061030). These comments reflect our review of the Water Supply chapter only for matters related to water resources for the project; you may receive additional comments from other divisions at LADWP, separately, for other respective areas in the DEIR, such as water infrastructure capacity, etc. D1-1

1. The last sentences of the first paragraphs of p. IV.H-5 and p. B-175 of the DEIR – see excerpt below – indicate a 2007-2011 average annual flow value. Footnote 7 (p.IV.H-5) and 6 (p. B-175) specify the source (dated May 2008) for the 2007-2011 average annual flow value; however, the source does not contain the 2007-2011 actual/projected average annual flow values. Therefore, please replace the footnotes on p.Iv.H-5 and p. B-175. D1-2

Paragraph Excerpt from DEIR, p. IV.H-5 and p. B-175 of Attachment B of Appendix III of DEIR:

"To serve the residents, businesses, and industries of Los Angeles, the LADWP has more than 7,200 miles of pipelines; 699,600 service connections; 59,346 fire hydrants; over 70 pumping stations; and 110 reservoirs and tanks. From 2007 to 2011, the LADWP supplied about 197 billion gallons of water annually for the City's

D1-2, Cntd

residential and business services.[6]"

Foot note Excerpt from DEIR, p.IV.H-5 and p. B-175 of Attachment B of Appendix III of DEIR:

" Villaraigosa, Antonia R. Securing L.A.'s Water Supply. Prepared by the City of Los Angeles Department of Water and Power. May 2008."

Replace footnote above from DEIR, p.IV.H-5 and p. B-175 with the following, and include the date accessed within the quote below:

"City of Los Angeles, Department of Water and Power, *ladwp.com* > *About Us* > *Water* > *Past & Present* (https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-water/a-w-pastandpresent?_adf.ctrl-state=il7srf7qf_4&_afrLoop=399895236462180) – Accessed on X/XX/20XX."

2. The first sentence after the bullet point list of p. B-178 of Attachment B of Appendix III of DEIR – see excerpt below – appears to imply that sufficient water supplies are available to serve the proposed project because a water supply assessment is not required for this project.

Excerpt from DEIR, p. B-178

D1-3

"Therefore, the proposed project would not result in significant impacts to utilities and service systems, and no further analysis related to having sufficient water supplies available to serve the proposed project from existing entitlements and resources is warranted."

However, the methodology for determining whether the project's demand is included in supply projections is not based on water supply assessment requirements. Instead, it is based on demographic projections included in the Regional Transportation Plan by the Southern California Association of Governments. Therefore, additional clarification should be provided as follows:

D1-3, Cntd

Replace above Excerpt from DEIR,p. B-178 of Attachment B of Appendix III of DEIR:

"Proposed Project is consistent with growth projections anticipated by the SCAG. Consistency with the demographic projection for the City from the 2012 RTP is required for Proposed Project. City's water demand projection in the 2010 UWMP was developed based on the 2008 Regional Transportation Plan (RTP) demographic projection by the Southern California Association of Governments (SCAG) using the 2000 U.S. Census for the City. The 2012 RTP demographic projection for the City was based on the 2010 U.S. Census, and is lower than the 2008 RTP demographic projection. The region's economic growth is usually a major factor behind net migration and the consequent population growth. The economic recession of 2007-2009 had a negative impact on the region's population growth, resulting in decrease in population growth from 2000 Census to 2010 Census. Our preliminary analysis shows that the City water demand projection to year 2035 based on demographic projection from 2012 RTP using population, housing and employment, as well as water conservation, and weather will be lower than the City's water demand projection in the 2010 UWMP. As a result, City's water supply projections in the 2010 UWMP are sufficient to meet the City's water demand projections based on the 2012 RTP."

3. The last sentence of the third paragraph of p.IV.H-8 of the DEIR, see below in bold, appears to imply that the project would not require new water and wastewater treatment facilities or expansion of existing treatment plants because of sufficient capacity at Hyperion Treatment Plant.

Excerpt from DEIR, p. IV.H-8

"**Therefore, with the increased expansion of the HTP service area and a remaining capacity of approximately 88 mgd at HTP, there would be no impacts to utilities and service systems related to the construction of new water or wastewater treatment facilities.**"

D1-4

However, with respect to water treatment, it is not accurate to estimate the capacity of the existing water treatment plant (LAAFP – Los Angeles Aqueduct Filtration Plant) to meet project demand based on wastewater treatment plant data. Please remove any reference to water treatment from the last sentence of the third paragraph of p.IV.H-8 of the DEIR and address water treatment, separately, using the following:

"The maximum water treatment capacity at the LAAFP is 600 million gallons per day, or approximately 672,000 acre-fee per year (AFY). LAAFP

D1-4, Cntd

typically treats water from LAA (Los Angeles Aqueduct) and purchases from MWD (Metropolitan Water District). The current average annual flow through LAAFP is approximately 362 million gallons per day, or 405,000 AFY – Acre-feet per year – (averaged over CY 2013). Exhibit 11E, of LADWP's 2010 Urban Water Management Plan (UWMP), shows that the total annual water supplies from LAA and MWD between years 2020 through 2035 are less than 470,000 AFY. The project's water demand is accounted for in the City's future projected demands. Consequently, the current treatment capacity of LAAFP is estimated to be adequate to accommodate future demands. Therefore, there would be no impacts to utilities and service systems related to the construction of new water treatment facilities."

4. The last sentence of the last paragraph of p. B-177 of Attachment B of Appendix III of the DEIR – see excerpt below in bold – appears to imply that the project would not require new water and wastewater treatment facilities or expansion of existing treatment plants because of sufficient capacity at Hyperion Treatment Plant.

Excerpt from DEIR, p. B-177 of Attachment B of Appendix III of DEIR:

"**Therefore, with the increased expansion of the HTP service area and a remaining capacity of approximately 88 mgd at HTP, there would be no impacts to utilities and service systems related to the construction of new water or wastewater treatment facilities or expansion of facilities, causing significant environmental effects and no further analysis is warranted."**

However, with respect to water treatment , it is not accurate to estimate the capacity of the existing water treatment plant (LAAFP – Los Angeles Aqueduct Filtration Plant) to meet project demand based on wastewater treatment plant data. Please remove any reference to water treatment from the last sentence of the last paragraph of p. B-177 of Attachment B of Appendix III of the DEIR and address water treatment, separately, using the following:

D1-5

"The maximum treatment capacity at the LAAFP is 600 million gallons per day, or approximately 672,000 acre-fee per year (AFY). LAAFP typically treats water from LAA and purchases from MWD. The current average annual flow through LAAFP is approximately 362 million gallons per day, or 405,000 AFY (averaged over CY 2013). Exhibit 11E, of LADWP's 2010 Urban Water Management Plan (UWMP), shows that the total annual water supplies from LAA and MWD between years 2020 through 2035 are less than 470,000 AFY. The project's water demand is accounted for in the City's future projected demands. Consequently, the current treatment plant capacity of LAAFP is estimated to be adequate to accommodate

D1-5, Cntd

future demands. Therefore, there would be no impacts to utilities and service systems related to the construction of new water treatment facilities."

If you have any questions, please let me know.

Thank you!

Earl Moosbrugger, PE

Resources Development and Supply Assessment Group

Water Resources

Los Angeles Department of Water and Power

111 N. Hope Street, Room 1450

Los Angeles, CA 90012

(213) 367-2527

----------Confidentiality Notice----------
This electronic message transmission contains information from the Los Angeles Department of Water and Power, which may be confidential. If you are not the intended recipient, be aware that any disclosure, copying, distribution or use of the content of this information is prohibited. If you have received this communication in error, please notify us immediately by e-mail and delete the original message and any attachment without reading or saving in any manner.

FORM GEN. 160 (Rev. 8-12)

CITY OF LOS ANGELES
INTER-DEPARTMENTAL CORRESPONDENCE

RECEIVED
CITY OF LOS ANGELES
MAR 19 2015
ENVIRONMENTAL UNIT

DATE: March 2, 2015

TO: Srimal Hewawitharana, Environmental Specialist II
Department of City Planning

FROM: Ali Poosti, Division Manager for
Wastewater Engineering Services Division
LA Sanitation

SUBJECT: **4051 SOUTH ALAMEDA STREET PROJECT – NOTICE OF COMPLETION AND AVAILABILITY OF DRAFT EIR**

This is in response to your January 22, 2015 letter requesting a review of your proposed industrial building project located at 4051 South Alameda Street, Los Angeles, CA 90058. The Bureau of Sanitation has conducted a preliminary evaluation of the potential impacts to the wastewater and stormwater systems for the proposed project. D2-1

WASTEWATER REQUIREMENT

The Bureau of Sanitation, Wastewater Engineering Services Division (WESD) is charged with the task of evaluating the local sewer conditions and to determine if available wastewater capacity exists for future developments. The evaluation will determine cumulative sewer impacts and guide the planning process for any future sewer improvements projects needed to provide future capacity as the City grows and develops.

Projected Wastewater Discharges for the Proposed Project:

Type Description	Average Daily Flow per Type Description (GPD/UNIT)	Proposed No. of Units	Average Daily Flow (GPD)
Proposed			
Warehouse	30 GPD/1000 SQ.FT	365,945 SQ.FT	10,978
Office Space	170 GPD/1000 SQ.FT	85,181 SQ.FT	14,481
Manufacturing	50 GPD/1000 SQ.FT	29,896 SQ.FT	1,495
Total			**26,954**

SEWER AVAILABILITY

The sewer infrastructure in the vicinity of the proposed project includes an existing 8-inch line that discharges into a 10-inch line on Martin Luther King Jr. Blvd, an existing 8-inch line on 41st St., an existing 8-inch line on 40th Pl., and an existing 10-inch line on Long Beach Ave. The sewage from all these sewers feed into a 10-inch line on Long Beach Ave before discharging into a 45-inch line on 41st Pl. Figure 1 shows the details of the sewer system within the vicinity of the project. The current flow level (d/D) in the 8-inch line that discharges into a 10-inch line on Martin Luther King Jr. Blvd. and the 8-inch line on 40th Pl. cannot be determined at this time without additional gauging. D2-2

The current approximate flow level (d/D) and the design capacities at d/D of 50% in the sewer system are as follows:

Pipe Diameter (in)	Pipe Location	Current Gauging d/D (%)	50% Design Capacity
8	Martin Luther King Jr. Blvd.	25	198,599 GPD
10	Martin Luther King Jr. Blvd.	*	360,084 GPD
8	40th Pl.	*	229,323 GPD
8	41st St.	*	229,323 GPD
10	Long Beach Ave. East	*	394,453 GPD
45	41st Pl.	30	294,000 GPD
45	41st Pl.	41	427,000 GPD

* No gauging available

D2-2 Cnt'd

Based on the estimated flows, it appears the sewer system might be able to accommodate the total flow for your proposed project. Further detailed gauging and evaluation will be needed as part of the permit process to identify a specific sewer connection point. If the public sewer has insufficient capacity then the developer will be required to build sewer lines to a point in the sewer system with sufficient capacity. A final approval for sewer capacity and connection permit will be made at that time. Ultimately, this sewage flow will be conveyed to the Hyperion Treatment Plant, which has sufficient capacity for the project.

If you have any questions, please call Kwasi Berko of my staff at (323) 342-1562.

STORMWATER REQUIREMENTS

The Bureau of Sanitation, Watershed Protection Division (WPD) is charged with the task of ensuring the implementation of the Municipal Stormwater Permit requirements within the City of Los Angeles. We anticipate the following requirements would apply for this project.

POST-CONSTRUCTION MITIGATION REQUIREMENTS

The project requires implementation of stormwater mitigation measures. These requirements are based on the Standard Urban Stormwater Mitigation Plan (SUSMP) and the recently adopted Low Impact Development (LID) requirements. The projects that are subject to SUSMP/LID are required to incorporate measures to mitigate the impact of stormwater runoff. The requirements are outlined in the guidance manual titled "*Development Best Management Practices Handbook – Part B: Planning Activities*". Current regulations prioritize infiltration, capture/use, and then biofiltration as the preferred stormwater control measures. The relevant documents can be found at: www.lastormwater.org. It is advised that input regarding SUSMP requirements be received in the early phases of the project from WPD's plan-checking staff.

D2-3

GREEN STREETS

The City is developing a Green Street Initiative that will require projects to implement Green Street elements in the parkway areas between the roadway and sidewalk of the public right-of-away to capture and retain stormwater and urban runoff to mitigate the impact of stormwater runoff and other environmental concerns. The goals of the Green Street elements are to

improve the water quality of stormwater runoff, recharge local ground water basins, improve air quality, reduce the heat island effect of street pavement, enhance pedestrian use of sidewalks, and encourage alternate means of transportation. The Green Street elements may include infiltration systems, biofiltration swales, and permeable pavements where stormwater can be easily directed from the streets into the parkways and can be implemented in conjunction with the SUSMP/LID requirements.

D2-3 Cnt'd

CONSTRUCTION REQUIREMENTS

The project is required to implement stormwater control measures during its construction phase. All projects are subject to a set of minimum control measures to lessen the impact of stormwater pollution. In addition for projects that involve construction during the rainy season that is between October 1 and April 15, a Wet Weather Erosion Control Plan is required to be prepared. Also projects that disturb more than one-acre of land are subject to the California General Construction Stormwater Permit. As part of this requirement a Notice of Intent (NOI) needs to be filed with the State of California and a Storm Water Pollution Prevention Plan (SWPPP) needs to be prepared. The SWPPP must be maintained on-site during the duration of construction.

D2-4

If there are questions regarding the stormwater requirements, please call Kosta Kaporis at (213) 485-0586, or WPD's plan-checking counter at (213) 482-7066. WPD's plan-checking counter can also be visited at 201 N. Figueroa, 3rd Fl, Station 18

SOLID RESOURCE REQUIREMENTS

The City has a standard requirement that applies to all proposed residential developments of four or more units or where the addition of floor areas is 25 percent or more, and all other development projects where the addition of floor area is 30 percent or more. Such developments must set aside a recycling area or room for onsite recycling activities. For more details of this requirement, please contact Daniel Hackney of the Special Project Division at (213)485-3684.

D2-5

KB\AP:tn

Attachment: Figure 1 – Sewer Map

c: Kosta Kaporis, LASAN
Daniel Hackney, LASAN
Eduardo Perez, LASAN

LETTER D2



Wastewater Engineering Services Division
Bureau of Sanitation
City of Los Angeles

FIGURE 1
4051 South Alameda Street Project
Sewer Map

LETTER E1

RECEIVED
CITY OF LOS ANGELES
MAR 23 2015
ENVIRONMENTAL
UNIT

Hola mi nombre es

Victorina tengo 9 años viviendo en los Angeles CA.
tengo 5 años trabajando en Impac Gracias a este trabajo me a yudado a sacar mi familia adelante me siento muy contenta trabajando en esta con pania gracias al patron es muy buena persona

E1-1

ATentamente

Victorina Alcoser

From: Srimal Hewawitharana
To: Eric Charlton
Subject: Fwd: I Reject the PIMA Warehouses!
Date: Friday, March 06, 2015 2:52:44 PM

---------- Forwarded message ----------
From: **Andrew Altamirano** <andrew_altamirano@yahoo.com>
Date: Fri, Mar 6, 2015 at 2:03 PM
Subject: I Reject the PIMA Warehouses!
To: LA City Planning Department <srimal.hewawitharana@lacity.org>, Mayor Eric Garcetti <mayor.garcetti@lacity.org>, CD 1 Gilbert Cedillo <councilmember.cedillo@lacity.org>, CD 2 Paul Krekorian <councilmember.Krekorian@lacity.org>, CD 3 Bob Blumenfield <councilmember.blumenfield@lacity.org>, CD 4 Tom LaBonge <councilmember.Labonge@lacity.org>, CD 5 Paul Koretz <paul.koretz@lacity.org>, CD 6 Nury Martinez <councilmember.martinez@lacity.org>, CD 7 Felipe Fuentes <councilmember.fuentes@lacity.org>, CD 8 Bernard Parks <councilmember.parks@lacity.org>, "CD 9 Curren D. Price" <councilmember.price@lacity.org>, "CD 10 Herb J. Wesson" <councilmember.wesson@lacity.org>, CD 11 Mike Bonin <councilmember.bonin@lacity.org>, CD 12 Mitchell Englander <councilmember.englander@lacity.org>, CD 13 Mitch O'Farrell <councilmember.ofarrell@lacity.org>, CD 14 Jose Huizar <councilmember.huizar@lacity.org>, CD 15 Joe Buscaino <councilmember.buscaino@lacity.org>, "Supervisor 1 Hilda L. Solis" <hildasolis@bos.lacounty.gov>, Supervisor 2 Mark Ridley-Thomas <markridleythomas@bos.lacounty.gov>, Supervisor 3 Sheila Kuehl <sheila@bos.lacounty.gov>, Supervisor 4 Don Knabe <don@bos.lacounty.gov>, "Supervisor 5 Michael D. Antonovich" <fifthdistrict@lacbos.org>

02/27/2015 23:18:32
Andrew Altamirano
Zip Code 90026

South LA Sweatshops will
have long term detrimental health impact to the residents of South Central Los Angeles The City Planning Department has announced its intention to allow 4 warehouses to be built with a substandard Draft Environmental Impact Report (Case Number: ENV-2012-920-EIR, AA-2012-919-PMLA, DIR-2013-887-SPR), a move Farm representatives and the community say will have long term detrimental health impacts for local South LA residents. Plans call for 4 warehouse facilities that will draw some 75 diesel big rigs into the area every day, creating an intolerable concentration of diesel fumes and particulate matter in a neighborhood in a warehousing district already saturated with such exhaust, posing the danger of increased risks of cancer, emphysema, asthma, and increased hospitalizations to poor people of color who live in the district. South Central Farm representative Tezozomoc said, "This is an unmistakable and undeniable threat to the health and well being of the people who live here, and that the City Planning Department has accepted a substandard Draft Environmental Impact Report on behalf of PIMA is a clear cut example

E2-1

of environmental racism." I call on the city, " to unconditionally reject the DEIR and return the land to the community to anchor an environmental justice project to begin to clean up the community". It is clear that Los Angeles City has failed the residents of South LA by considering a substandard DEIR. In 2008 the City of Los Angeles reviewed a project submitted by Horowitz to do one warehouse that encompassed 437,196 sq. ft. (see Case No. ENV-2008-799-MND, VTT-61482, DIR-2008-841-SPR, aka 41st and Alameda Warehouse Project) and at that time there would be 264 truck trips per day. In the recent DEIR PIMA will be developing 481,022 sq. ft. of warehouse space; comprised of 4 buildings and over 2000 car trips per day. In PIMA's proposal they claim a mere 75 trip trucks a day. There is a difference of 189 truck trips per days for a warehouse space that is 10% larger. There is a difference of 70% in truck trips. What is problematic with this assumption is that all further analysis will be based on the underspecified 75 truck trips per day. While this under estimation of the truck trips may get the project approved by the City; the city under Jan Perry has supported this project, it will have long negative impact on the residents of South Los Angeles. In the realm of Air Quality Health Risk Assessment the truck trips are further down estimated to 31 diesel fueled trucks per day. The Kleinfelder's Health Risk Analysis is faulty because it also assumes a degraded amount of truck trips per day; 75 truck trips per day. Regional Air Quality The air quality in Southern California does not meet the state and federal standards. The American Lung Association consistently gives Los Angeles County failing grades in the amount of ozone and particulate pollution in the air. Although smog levels are impacted by seasons and weather patterns, smog is visible in the air on most days. Online location of the 2015 DEIR: http://cityplanning.lacity.org/eir/4051SoAlamedaStProj/Index.pdf 2008 MND by Horowitz http://1drv.ms/1BiXQ2k, http://1drv.ms/1BiY6OM

E2-2

E2-3

LETTER E2

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APR 03 2015
ENVIRONMENTAL
UNIT

3-6-15

Me llamo Jose Angel Amigón vivo 516 E 61st Los Angeles C.a. 90003 y he trabajado para la compañia de Impact desde el año 2002 como ayudante de piso tra bajo que he realizado con mucho Orgullo y tratando de ser cada dia mejor mi desempeño ya que gracias a que tengo este trabajo e podido Sacar y ayudar a mi familia

E3-1

Jose Angel Amigón.

Hola: Mi nombre es Victoria Angon
y vivo en el Sur Centro de los
Angeles California desde ase 17 años
y trabajo en Impac desde el 7 de Enero
del 2004 mi ocupacion es inspecionar
el trabajo terminado y me gusta mi
trabajo y estoy muy a gusto con mi
Patron y con mis Compañeros y mis compañeras
Porque tengo 11 años trabajando
con mi Patron gracias a el me
a ayudo a sacar adelante mi familia

Atentamente Victoria Angon

E4-1

RECEIVED
CITY OF LOS ANGELES
MAR 23 2015
ENVIRONMENTAL
UNIT

LETTER E5

RECEIVED
CITY OF LOS ANGELES
MAR 12 2015
ENVIRONMENTAL
UNIT

March 8, 2015

I have work for IMPACT for around 25 years under my employer Tony. I have no complaints. I am happy with the way the working environment operates. I have gained a lot of experience through them teaching me. I like what I do because I know I can achieve good results.

E5-1

Tony is a generous and good person who cares for his employees. Tony makes sure that everything is running smoothly to get the results that are needed. It is a pleasure working for Tony and I am grateful having to be part of this company for a long time that I seek to continue.

Sincerely,

Eulalia Baranda

From: Srimal Hewawitharana
To: Eric Charlton
Subject: Fwd: I Reject the PIMA Warehouses!
Date: Friday, March 06, 2015 2:47:05 PM

---------- Forwarded message ----------
From: **Valerie Belt** <vbelt@hotmail.com>
Date: Fri, Mar 6, 2015 at 1:59 PM
Subject: I Reject the PIMA Warehouses!
To: LA City Planning Department <srimal.hewawitharana@lacity.org>, Mayor Eric Garcetti <mayor.garcetti@lacity.org>, CD 1 Gilbert Cedillo <councilmember.cedillo@lacity.org>, CD 2 Paul Krekorian <councilmember.Krekorian@lacity.org>, CD 3 Bob Blumenfield <councilmember.blumenfield@lacity.org>, CD 4 Tom LaBonge <councilmember.Labonge@lacity.org>, CD 5 Paul Koretz <paul.koretz@lacity.org>, CD 6 Nury Martinez <councilmember.martinez@lacity.org>, CD 7 Felipe Fuentes <councilmember.fuentes@lacity.org>, CD 8 Bernard Parks <councilmember.parks@lacity.org>, "CD 9 Curren D. Price" <councilmember.price@lacity.org>, "CD 10 Herb J. Wesson" <councilmember.wesson@lacity.org>, CD 11 Mike Bonin <councilmember.bonin@lacity.org>, CD 12 Mitchell Englander <councilmember.englander@lacity.org>, CD 13 Mitch O'Farrell <councilmember.ofarrell@lacity.org>, CD 14 Jose Huizar <councilmember.huizar@lacity.org>, CD 15 Joe Buscaino <councilmember.buscaino@lacity.org>, "Supervisor 1 Hilda L. Solis" <hildasolis@bos.lacounty.gov>, Supervisor 2 Mark Ridley-Thomas <markridleythomas@bos.lacounty.gov>, Supervisor 3 Sheila Kuehl <sheila@bos.lacounty.gov>, Supervisor 4 Don Knabe <don@bos.lacounty.gov>, "Supervisor 5 Michael D. Antonovich" <fifthdistrict@lacbos.org>

02/27/2015 20:59:08
Valerie Belt
Zip Code 90272

South LA Sweatshops will have long term detrimental health impact to the residents of South Central Los Angeles

The City Planning Department has announced its intention to allow 4 warehouses to be built with a substandard Draft Environmental Impact Report (Case Number: ENV-2012-920-EIR, AA-2012-919-PMLA, DIR-2013-887-SPR), a move Farm representatives and the community say will have long term detrimental health impacts for local South LA residents. Plans call for 4 warehouse facilities that will draw some 75 diesel big rigs into the area every day, creating an intolerable concentration of diesel fumes and particulate matter in a neighborhood in a warehousing district already saturated with such exhaust, posing the danger of increased risks of cancer, emphysema, asthma, and increased hospitalizations to poor people of color who live in the district. South Central Farm representative Tezozomoc said, "This is an unmistakable and undeniable threat to the health and well being of the people who live here, and that the City Planning Department has accepted a substandard Draft Environmental Impact
Report on behalf of PIMA is a clear cut example of environmental racism."

E6-1

I call on the city, " to unconditionally reject the DEIR and return the land to the community to anchor an environmental justice project to begin to clean up the community". It is clear that Los Angeles City has failed the residents of South LA by considering a substandard DEIR. In 2008 the City of Los Angeles reviewed a project submitted by Horowitz to do one warehouse that encompassed 437,196 sq. ft. (see Case No. ENV-2008-799-MND, VTT-61482, DIR-2008-841-SPR, aka 41st and Alameda Warehouse Project) and at that time there would be 264 truck trips per day. In the recent DEIR PIMA will be developing 481,022 sq. ft. of warehouse space; comprised of 4 buildings and over 2000 car trips per day. In PIMA's proposal they claim a mere 75 trip trucks a day. There is a difference of 189 truck trips per days for a warehouse space that is 10% larger. There is a difference of 70% in truck trips. What is problematic with this assumption is that all further analysis will be based on
the underspecified 75 truck trips per day. While this under estimation of the truck trips may get the project approved by the City; the city under Jan Perry has supported this project, it will have long negative impact on the residents of South Los Angeles.
In the realm of Air Quality Health Risk Assessment the truck trips are further down estimated to 31 diesel fueled trucks per day. The Kleinfelder's Health Risk Analysis is faulty because it also assumes a degraded amount of truck trips per day; 75 truck trips per day.

E6-2

Regional Air Quality
The air quality in Southern California does not meet the state and federal standards. The American Lung Association consistently gives Los Angeles County failing grades in the amount of ozone and particulate pollution in the air. Although smog levels are impacted by seasons and weather patterns, smog is visible in the air on most days.

E6-3

Online location of the 2015 DEIR:
http://cityplanning.lacity.org/eir/4051SoAlamedaStProj/Index.pdf
2008 MND by Horowitz http://1drv.ms/1BiXQ2k, http://1drv.ms/1BiY6OM

LETTER E7

CHATTEN-BROWN & CARSTENS
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MNB@CBCEARTHLAW.COM

March 9, 2015

Via Email srimal.hewawitharana@lacity.org

Srimal Hewawitharana
Environmental Specialist II
Los Angeles City Planning Department
EIR Analysis Section
Department of City Planning
200 N. Spring Street, Room 750
Los Angeles, CA 90012

Re: Draft EIR for 4051 South Alameda Street Project,
Case No. ENV-2012-920-EIR, AA-2012-919-PMLA,
DIR-02013-887-SPR, State Clearinghouse No. 2014061030

Dear Ms. Hewawitharana:

On behalf of Mr. Tezozomoc of the South Central Farmers, we submit these comments on the draft environmental impact report ("DEIR") prepared for the 4051 South Alameda Street Project ("Project" or "warehouse project"). The Project would authorize construction of four massive warehouse buildings containing nearly one-half million square feet of development on 14 acres formerly occupied by the South Central Farm, a mere 150 feet from the nearest residence. Specifically, the warehouse project would contain 365,945 square feet of warehouse space, 85,181 square feet of office space, and 29,896 square feet of manufacturing space, albeit for undisclosed purposes. Notably, the Project would require significant widening of South Alameda Street, Long Beach Avenue, and 41st Street, reducing the streets' safety and utility for neighborhood pedestrians. It would also develop 2.6 acres of the Project site that had been promised as a park after the City's settlement with the former landowner. E7-1

The South Central Farmers are comprised of approximately 350 families residing in the community surrounding the Project site. From 1994 to 2006, the South Central Farmers operated the Project site as the South Central Community Garden. At 14 acres, the garden was one of the largest urban community gardens in the United States, growing 100 to 150 different species of fruits, vegetables, herbs. The garden also grew

Mesoamerican traditional plants unavailable in local or national markets. The garden served as a focal point for the farmers and their families until the farmers were evicted in 2006. Although the farmers were promised relocation to additional farm sites due to the then-property owner's desire to develop the property, only a portion of the promised acreage has ever been made available, and the Project site has remained vacant. The South Central Farmers now truck in fresh produce grown in Buttonwillow and Lake Hughes, but nothing has been done to alleviate the food desert in their community. The 3-acre soccer field promised by the then-property owner has also never been constructed, leaving the surrounding neighborhood without its beloved community garden and without any other green space to replace this lost community center. E7-1 Cnt'd

The South Central Farmers are particularly concerned about the warehouse project's contribution to the region's already poor air quality and the corresponding impacts on community health. While the DEIR purports to have analyzed the Project's likely air emissions and to have performed a health risk assessment, these analyses are based upon an inadequate project description and an underestimation of daily truck trips. The Project will also adversely impact the community by foreclosing the opportunity to develop the Project site into much-needed community green space. These impacts could be reduced or avoided entirely by feasible alternatives to the warehouse project. In particular, the South Central Farmers have for years advocated returning the Project site to use as a community garden. In addition to avoiding the Project's admittedly significant impacts on air quality, cultural resources, transportation and traffic, and utilities and service systems, the community garden or a parks and recreation alternative would alleviate the area's park shortage and provide a focal point for community activities and gatherings, while buffering residences from dense industrial uses located to the east. E7-2

The California Environmental Quality Act (CEQA) serves two basic, interrelated functions: ensuring environmental protection and encouraging governmental transparency. (*Citizens of Goleta Valley v. Bd. of Supervisors* (1990) 52 Cal. 3d 553, 564.) CEQA requires full disclosure of a project's significant environmental effects so that decisionmakers and the public are informed of these consequences before the project is approved, to ensure that government officials are held accountable for these consequences. (*Laurel Heights Improvement Ass'n of San Francisco v. Regents of the University of California* (1988) 47 Cal.3d 376, 392.) The environmental impact report (EIR) process is the "heart of CEQA" and is the chief mechanism to effectuate its statutory purposes. (*In Re Bay-Delta Programmatic EIR Coordinated Proceedings* (2008) 43 Cal. 4th 1143, 1162.) The South Central Farmers are concerned that the DEIR fails to adequately disclose, analyze, and mitigate many of the warehouse project's significant adverse environmental impacts. Also of great concern is the DEIR's failure to adequately and accurately consider feasible alternatives to the Project that would E7-3

reduce the Project's many significant adverse impacts. E7-3 Cnt'd

I. An Inadequate Project Description Prevents a Complete Analysis of the Project's Potentially Significant Environmental Impacts.

CEQA requires an EIR to contain a project description that gives a "general description of the project's technical, economic, and environmental characteristics." (CEQA Guidelines § 15124(c)). It must also "include detail sufficient to enable those who did not participate in its preparation to understand and to consider meaningfully the issues raised by the proposed project." (*Association of Irritated Residents v. County of Madera* (2003) 107 Cal.App.4th 1383, 1390.) Here, the DEIR discloses that the Project would construct four warehouses to be used for garment manufacturing, but it does not specify the aspects of garment manufacturing that would occur. This failure to describe key elements of the Project prevents the public and decisionmakers from fully evaluating the Project's likely impacts and the accuracy of the information presented in the EIR. (*San Joaquin Raptor/Wildlife Rescue Center v. County of Stanislaus* (1994) 27 Cal.App.4th 713, 730-35 [the project description cannot fail to describe key elements of the Project].) E7-4

For example, the types of activities occurring in the warehouse will impact the number of workers needed onsite, which will impact the number of shifts, the modes of transportation used by employees, and the Project's likely impacts on traffic and noise. The types of activities will also impact the number of truck trips per day due to deliveries and shipping of finished products, which impact the diesel and other pollutant emissions, which impact the Project's affect on community health. If the warehouses will include dyeing of fabrics, chemicals used in the process and measures for containment and disposal must be disclosed in the DEIR. As none of this information is contained in the DEIR, the DEIR lacks much of the required analysis, and the public and City decisionmakers have been denied the opportunity to fully understand the Project and its likely consequences for the community. "Environmental review derives its vitality from public participation." (*Ocean View Estates Homeowners Ass'n, Inc. v. Montecito Water Dist.* (2004) 116 Cal.App.4th 396, 400.)

II. The EIR Fails to Consider Alternatives to the Project.

A. The EIR Fails to Consider a Reasonable Range of Alternatives. E7-5

The City has a duty under CEQA to evaluate a reasonable range of alternatives to the warehouse project, especially in light of its significant acknowledged and unacknowledged adverse impacts. "One of [an EIR's] major functions . . . is to ensure

E7-5 Cnt'd

that *all reasonable alternatives* to proposed projects are thoroughly assessed by the responsible official." (*Laurel Heights I*, *supra*, 47 Cal.3d at 400, quoting *Wildlife Alive v. Chickering* (1976) 18 Cal.3d 190, 197; emphasis in original.) Further, "Under CEQA, the public agency bears the burden of *affirmatively demonstrating* that…the agency's approval of the proposed project *followed meaningful consideration of alternatives* and mitigation measures." (*Mountain Lion Foundation v. Fish and Game Commission* (1997) 16 Cal.4th 105, 134, emphasis added.) Just as the EIR is the "heart of CEQA", the alternatives analysis is the "core of the EIR." (Guidelines, § 15003(a); *Laurel Heights Improvement Assn. v. Regents* (1988) 47 Cal.3d 376, 392; *Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal 3d 553, 564.)

The EIR's alternatives analysis fails to satisfy CEQA's statutory mandate by analyzing no actual alternative to the Project other than the compulsory "no project" alternative. While the DEIR lists three alternatives, these alternatives consist of (A) No Project Alternative, (B) Use of Clean Fuel Trucks, (C) Reduced Truck Operations. None of these alternatives includes an alternative use to the warehouse project or to its location. None of these alternatives address the Project's significant impact on utilities and service systems, or on its contribution to the already-severe air quality along the Alameda Corridor.

The unreasonably narrow range of alternatives likely derives from unreasonably narrow project objectives. Use of unduly narrow project objectives violates CEQA. (*In Re Bay Delta Coordinated Environmental Impact Report Proceedings* (2008) 43 Cal. 4th 1143, 1166 ["a lead agency may not give a project's purpose an artificially narrow definition"].) The project objectives include a requirement of at least 480,000 square feet of light industrial space, location within 3 miles of an existing garment manufacturing labor force in the Southeast Los Angeles Community Plan Area, location along the Alameda Corridor, and provision of enhanced employment opportunities and tax revenue. No information is given about why 480,000 square feet is necessary, or why it must be located in one place, at the expense of a planned 2.6-acre park.

The lead agency must exercise its independent judgment on project objectives, and must not uncritically accept the applicant's objectives. (Pub. Resources Code § 21082.1 (c)(1); *Uphold Our Heritage v. Town of Woodside* (2007) 147 Cal.App.4th 587]; *Preservation Action Council v. City of San Jose* (2006) 141 Cal.App.4th 1336, 1352; *Save Round Valley Alliance v. County of Inyo* (2007) 157 Cal.App.4th 1437, 1460.) The City should take this opportunity to think about what would most benefit this community. The DEIR must be revised to include alternatives to the Project, including alternatives that preserve some of the site's 14 acres as open space, and the community garden and park alternatives. The revised DEIR should also consider alternative locations to the

E7-5 Cnt'd

project site for the warehouse project, which could conceivably be located on any industrial zoned land in the area.

E7-6

B. The EIR Rejects and Fails to Analyze Feasible Park and Community Garden Alternatives.

In order to achieve CEQA's substantive mandate to avoid or reduce adverse environmental impacts, *potentially* feasible alternatives must be analyzed so that the decisionmaking process regarding feasibility can be subject to public review. "If an alternative is identified as at least potentially feasible, an in-depth discussion is required." (*Save Round Valley Alliance v. County of Inyo* (2007) 157 Cal. App. 4th 1437, 1457.)

CEQA imposes a high standard for the rejection of alternatives. A reasonable alternative may only be eliminated from consideration in the EIR if the alternative would not meet most of the basic project objectives, is infeasible, or would not reduce significant environmental impacts. (Guidelines § 15126.6(c); *Save Round Valley Alliance v. County of Inyo* (2007) 157 Cal.App.4th 1437, 1457.) An alternative is considered feasible if it is "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and technological factors." (Public Resources Code § 21061.1.) Such alternatives must be discussed "even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly." (Guidelines § 15126.6(b).) A project need only feasibly attain "most" of the project objectives, not all of them, to require analysis. (CEQA Guidelines §15126.6(a)(f).)

The South Central Farmers, National Resources Defense Council ("NRDC"), Center for Biological Diversity, and other community advocates have proposed several feasible alternatives aimed at increasing community resiliency and quality of life that would reduce or entirely avoid the Project's significant adverse impacts on air quality, traffic and transportation, and utilities and service systems. An in-depth discussion of these alternatives was required in the EIR, but not provided. (*Save Round Valley, supra*, 157 Cal.App.4th 1457; see 3 AR 1066-1192.)

Based on inapplicable limitations, the DEIR asserts that an alternative reinstituting the community garden alternative is infeasible because it would not comply with applicable zoning. (DEIR, p. VI-3.) The Light Industrial Zone applicable to the project site allows for agricultural uses by right. (Los Angeles Municipal Code, Chapter 1, Article 2, Section 12.19 ("M2" LIGHT INDUSTRIAL ZONE) [M2 Zone allows "[a]ny open lot use permitted in an 'A' or 'R' Zone, which does not involve the use of buildings

E7-6 Cnt'd

or structures other than accessory buildings incident to the use of the land."]; see also DEIR, p. I-5; DEIR, p. II-3.) Further, a community garden alternative would bring economic benefit and community value. Before their removal, 350 families farmed the project site, which produced large amounts of both healthy and economically beneficial produce not otherwise available in the community. The farmers were invested in the community, and thousands of people benefited. Urban parks and gardens are economically beneficial to those located outside of the immediate community, as well. According to the Trust for Public Land (TPL), Long Island's parks provide $2.74 billion in annual economic benefits. (See, http://www.tpl.org/nassau-and-suffolk-counties-park-benefit-report.) These benefits include health benefits of $164 million per year due to the use of parks for outdoor exercise, a one-time property value increase of $5.8 billion due to proximity to open space, benefits due to water filtration, and $288 million in benefits due to the area's thriving agriculture industry. (*Ibid.*) Specifically, TPL's report cited local visits to strawberry fields in the spring and pumpkin patches in the fall, each of which are possible if a community garden alternative is implemented. These benefits will greatly exceed those brought to the community by the creation of low-wage jobs in the warehouse project. The DEIR's analysis also fails to account for grant funding and the assistance of foundations if a community garden alternative were implemented. Such funding and assistance has been offered to maintain a community garden on this site in the past.

E7-7

Although suggested during NOP comments and completely feasible, the DEIR improperly omits the park or recreation alternative from complete analysis. Only half of Los Angeles residents live within walking distance of a park. (2014 City Park Facts, Trust for Public Land, p. 12, available at http://www.tpl.org/sites/default/files/files_upload/2014_CityParkFacts.pdf .) Children have even less park access than the typical Angeleno. For example, Los Angles has only one park playground per 1,000 residents, falling near the bottom of over 100 cities surveyed by the Trust for Public Land in 2014. (2014 City Park Facts, Trust for Public Land, p. 13, available at http://www.tpl.org/sites/default/files/files_upload/2014_CityParkFacts.pdf.) Within the City, the project site's council district has the least park acreage per child of any district in Los Angeles. (See http://www.environment.ucla.edu/reportcard/article1455.html.)

This lack of park access has disastrous results for society and public health. In park-poor neighborhoods, children play in streets, alleyways, or vacant lots instead of on grassy meadows or soccer fields, if they go outside at all. The Trust for Public Land considers this "a national crisis of inactivity that has contributed to higher rates of obesity, diabetes, asthma, anxiety, and depression." (See, TPL website at http://www.tpl.org/our-work/parks-for-people.) Research suggests that parks promote public health and

revitalize local economies while connecting people and communities. For these reasons, the Southeast Los Angeles Community Plan, within which the project site is located, highlights the need for additional open space in the community. (DEIR, at p. IV.A-11.) The DEIR fails to show why the warehouse project could not be financially and physically feasible if constructed on 11.4 acres of the project site, which would allow the designation of 2.6 acres of the project site as a much need community park. This alternative should be combined with analysis of an off-site alternative and analyzed in a recirculated DEIR.

E7-7 Cnt'd

III. The Project's Mitigation Measures are Impermissibly Vague.

E7-8

CEQA requires that a project not be approved when there are significant adverse impacts if there are feasible alternatives or mitigation measures that can reduce those impacts. (Publ. Resources Code § 21002; 21002.1(b); CEQA Guidelines 15091(a); 15092(b).) As the DEIR failed to analyze any true alternatives to the Project that would avoid or reduce its disclosed and undisclosed significant impacts, the EIR was required to incorporate mitigation measures. (Pub. Resources Code § 21002.2; Guidelines § 15126.4.)

Specifically, the CEQA Guidelines require any mitigation measure to be "fully enforceable through permit conditions, agreements, or other legally-binding instruments." (CEQA Guidelines § 15126.4(a)(2);(CEQA Guidelines § 15097; see also *Lincoln Place Tenants Ass'n v. City of Los Angeles* (2005) 130 Cal.App.4th 1491, 1508 ["Mitigating conditions are not mere expressions of hope."]).) Unfortunately, many of the mitigation measures included in the warehouse project are vague and unenforceable or do not require the most effective mitigation measures feasible to reduce adverse impacts.

For example, mitigation measure Air-4, states that the developer "shall establish incentives for increased transit frequency", but no description is given of what incentives will be given and who they will be offered to. As a result, it is impossible for decisionmakers and the public to evaluate whether this proposed mitigation measure will be effective. Without the incorporation of performance standards, it is also impossible for the City or the community to determine if the developer has complied with the measures. Mitigation measure Air-6 is similarly vague, reading that the developer "shall provide traffic calming measures through street improvements," but these street improvements are never disclosed. In addition to preventing the public and decisionmakers from evaluating the effectiveness of this measure, the failure to provide sufficient information prevents the City from evaluating whether the street calming measures will actually reduce traffic impacts or if they will result in unintended adverse impacts.

Mitigation measure Traffic-3 would reclassify 41st street as a "Collector Street" and requires its widening by 22 feet. However, 41st street west of the Project site is surrounded by residences and passes through a recreation center. Would this conversion to a collector street be accompanied by higher speeds? If so, the DEIR must evaluate the safety and desirability of such a change to this neighborhood. E7-8 Cnt'd

Other mitigation measures are impermissibly deferred and this too violates CEQA. (*Endangered Habitats League v County of Orange* (2005) 131 Cal. App. 4th 777, 793-94; Guidelines Section 15126.4(a)(1)(B).) CEQA requires all mitigation measures for a project to be formulated during the environmental review process so their efficacy can be analyzed in the EIR. (*San Joaquin Raptor Rescue Center v. County of Merced* (2007) 149 Cal.App.4th 645, 669-670.) Courts have prohibited the deferral of mitigation measures because "[t]here cannot be meaningful scrutiny [of an environmental review document] when the mitigation measures are not set forth at the time of project approval." (*Oro Fino Gold Mining Corp. v. County of El Dorado* (1990) 225 Cal.App.3d 872, 884.) Deferral of the development of mitigation is only allowable where "specific performance criteria" are required at the "time of project approval." (*Sacramento Old City Association v. City Council of Sacramento* (1991) 229 Cal.App.3d 1011, 1029.)

Mitigation measure Utilities and Service Systems-1 requires the applicant to either "have further sewer system gauging obtained to identify specific sewer connection point based on the capacity of the public sewer or build sewer lines to a point in the system with sufficient capacity." As this mitigation measure makes it clear that the necessary analysis has not yet been conducted, the DEIR proposes impermissibly deferred mitigation. The sewer gauging should be done prior to project approval so that the EIR may mitigate the potential impacts of constructing new sewer lines. At the very least, construction of new sewer lines requires ground disturbance and often impacts roads such that they must be closed during construction of sewer lines and afterward for repair. CEQA requires these impacts to be disclosed now.

IV. The Greenhouse Gas Analysis and Mitigation is Inadequate.

E7-9

Based on the unsupportable conclusion that the Project will not generate significant greenhouse gas ("GHG") emissions, the DEIR fails to incorporate any mitigation measures for greenhouse gases. (DEIR p. I-12.) Given that the Project would construct nearly one-half million square feet of building space from raw materials, that it would require the use of electricity to operate, and that it would depend on trucks for the delivery of raw materials and the shipment of finished goods, this conclusion lacks substantial evidence. The DEIR must be revised to analyze the GHG emission that would be generated by the Project and to include specific and enforceable mitigation measures to

reduce those emissions. We hereby incorporate the comments submitted by the Center for Biological Diversity on the 2008 project proposed for this site. E7-9 Cnt'd

V. The EIR's Air Quality Analysis Understates Project Impacts and the Project's Likely Impacts to Human Health. E7-10

CEQA requires environmental review of a Project's potentially adverse impacts on human beings. (Guidelines § 15065 subd. (a)(2).) The project site is located along the Alameda Corridor connecting the Ports of Los Angeles and Long Beach to downtown heavy rail lines and is heavily traversed by diesel trucks and railroads. Existing air quality is among the worst in the South Coast Air Basin, and childhood asthma rates far exceed the average. Under these existing conditions, any Project contributions to poor air quality are cumulatively considerable. "One of the most important environmental lessons evident from past experience is that environmental damage often occurs incrementally from a variety of small sources." (*King County Farm Bureau v. City of Hanford* (1990) 221 Cal.App.3d 692.) This is particularly true with regard to air quality.

The health hazards of poor air quality are well documented. Countless peer-reviewed studies have been published documenting the dangers of living near freeways due to their emissions of ultra fine diesel particulate matter and other air pollutants. Ultra fine particulate matter causes cardiovascular and neuron damage. (See http://www.arb.ca.gov/research/health/healthup/jan03.pdf; see also http://ehp03.niehs.nih.gov/article/fetchArticle.action?articleURI=info%3Adoi%2F10.1289%2Fehp.1002973, both incorporated by reference.) Life expectancy rises as fine particle pollution drops. (See, http://articles.latimes.com/2012/dec/04/science/la-sci-sn-fine-particle-pollution-20121204, citing Harvard School of Public Health Study published in *Epidemiology*.) More than 90 percent of the particles in diesel exhaust are ultra fine particles, which are easily inhaled into the lung. (Matsuoka, Hricko, et al. Global Trade Impacts: Addressing the Health, Social, and Environmental Consequences of Moving International Freight Through Our Communities, March 2011, p. 17, available at http://departments.oxy.edu/uepi/, herein incorporated.) Diesel particulate matter also contains gases such as acetaldehyde, acrolein, benzene, 1,3-butadiene, formaldehyde and polycyclic aromatic hydrocarbons, increasing the hazards to human health. (Matsuoka, Hricko, et al. Global Trade Impacts: Addressing the Health, Social, and Environmental Consequences of Moving International Freight Through Our Communities, March 2011, p. 17, available at http://departments.oxy.edu/uepi/, herein incorporated.) Consequently, diesel particulate matter was declared a toxic air contaminant by the California Air Resources Board in 1998. According to the Air Resources Board, "Diesel particulate matter may cause cancer, premature death, and other health problems." (See http://www.arb.ca.gov/enf/hdvip/ccdet/saej1667.htm; see also,

E7-10 Cnt'd

http://www.arb.ca.gov/ch/communities/ra/westoakland/documents/factsheet0308.pdf.) These other health problems include asthma, bronchitis, and heart disease. (Miller et al., Long Term Exposure to Air Pollution and Incidence of Cardiovascular Events in Women, New England Journal of Medicine, 356:5 (2007) 447-458, available at http://burningissues.org/car-www/pdfs/miller-women-cv-NEJM4-2007.pdf, herein incorporated; see also http://www.ehib.org/page.jsp?page_key=90#pm_health.)

These pollutants have been correlated with asthma, congestive heart failure, autism, and other ailments, with the greatest impact on sensitive receptors such as children and the elderly, many of whom live near the Project site.

A study released just last week linked chronic exposure to microscopic air pollutants in vehicle exhaust, such as that experienced by the residents of this community, to deaths from heart disease. (Associations of Mortality with Long-Term Exposures to Fine and Ultrafine Particles, Species and Sources: Results from the California Teachers Study Cohort, Ostro et al., available online at http://ehp.niehs.nih.gov/wp-content/uploads/advpub/2015/1/ehp.1408565.acco.pdf, herein incorporated.) According to the *Los Angeles Times*' coverage of the study, "The finding bolsters evidence that ultrafine particles… contributor to health problems among people living near traffic." (LA Times, Feb. 25, 2015 http://www.latimes.com/local/lanow/la-tiny-pollutants-linked-to-heart-disease-deaths-20150225-story.html .) Major roadways were among the most ubiquitous of hundreds of sources of ultrafine particle pollution examined in the study.

Given the environmental baseline, the DEIR's air quality analysis and health risk assessment are of particular importance to the City's evaluation of the Project and to the surrounding community. As the Project's truck trips will likely comprise the majority of the Project's air pollution emissions, these analyses are based on the developer's estimated numbers of daily truck trips. Unfortunately, the numbers reported appear to underestimate the Project's true contributions to poor air quality – and especially to diesel emissions – and therefore appear to understate the significance of the Project's air quality impacts.

E7-11

The EIR assumes that the nearly one-half million square feet of industrial warehouse space will draw only 75 diesel trucks per day. By contrast, a similar, but slightly smaller project evaluated by the city in 2008 at the project site assumed generation of 264 truck trips per day. (Case No. ENV-2008-799-MND, VTT-61482, DIR-2008-841-SPR.) The DEIR fails to include sufficient information about the Project to justify the claimed 70 percent *reduction* in diesel truck trips that accompany the Project's 10 percent *increase* in size. The DEIR's analysis of air quality impacts and

health risks must be repeated in a revised DEIR that provides substantial evidence for its conclusions. This EIR must also include feasible and enforceable mitigation measures for the operation of the trucks. If this EIR purports to rely on cleaner technologies or other methods of shipping and receiving than diesel trucks, it must be demonstrated that these technologies and methods are both feasible and available to the Project. E7-11 Cnt'd

VI. The EIR Fails to Adequately Consider the Project's Noise Impacts on Surrounding Residential Neighborhoods. E7-12

The Initial Study found the Project's noise impacts insignificant resulting in the DEIR's failure to analyze and mitigate the Project's noise impacts on the community. (Initial Study, Exhibit B, p. 116, 124.) However, this conclusion lacks substantial evidence. First, the project description provides insufficient information about the project to accurately evaluate its proposed noise impacts. This is important, given that homes are located within 153 feet of the Project site. The Initial Study contemplates heating and air conditioning equipment and traffic, but none of the operations of the proposed warehouse itself. (*Id.* at 124.) Second, existing community noise levels are so high that any additional noise levels are considered cumulatively considerable and require mitigation.

According to the U.S. Environmental Protection Agency, exposure to high noise levels presents a "health risk in that noise may contribute to the development and aggravation of stress related conditions such as high blood pressure, coronary disease, ulcers, colitis, and migraine headaches…Growing evidence suggests a link between noise and cardiovascular problems. There is also evidence suggesting that noise may be related to birth defects and low birth-weight babies. There are also some indications that noise exposure can increase susceptibility to viral infection and toxic substances." (EPA Noise Effects Handbook, http://www.nonoise.org/library/handbook/handbook.htm, incorporated by reference; see also EPA *Noise: A Health Problem* http://www.nonoise.org/library/epahlth/epahlth.htm#heart%20disease, incorporated by reference.)

Potentially deadly cardiovascular impacts can be triggered by long-term average exposure to noise levels as low as 55 decibels. (See, World Health Organization Media Centre, http://www.euro.who.int/eprise/main/WHO/MediaCentre/PR/2009/20091008_1?language [elevated blood pressure and heart attacks], incorporated by reference; http://whqlibdoc.who.int/hq/1999/a68672.pdf [finding demonstrated cardiovascular impacts, including ischemic heart disease and hypertension after long-term exposure to 24 hour average noise values of 65-70 dBA], incorporated by reference.) Exposure to even

moderately high levels of noise during a single eight-hour period triggers the body's stress response. In turn, the body increases cortisol production, which stimulates vasoconstriction of blood vessels that results in a five to ten point increase in blood pressure. Over time, this noise-induced stress can result in hypertension and coronary artery disease, both of which increase the risk of heart attack death. (World Health Organization Media Centre, http://www.euro.who.int/eprise/main/WHO/MediaCentre/PR/2009/20091008_1?language [elevated blood pressure and heart attacks], incorporated by reference; http://whqlibdoc.who.int/hq/1999/a68672.pdf [finding demonstrated cardiovascular impacts, including ischemic heart disease and hypertension after long-term exposure to 24 hour average noise values of 65-70 dBA], incorporated by reference.) Studies on the use of tranquilizers, sleeping pills, psychotropic drugs, and mental hospital admission rates suggest that high noise levels cause adverse impacts on mental health. E7-12 Cnt'd

High noise levels also have dramatic developmental impacts on small children, many of whom might reside near the Project. Children who are exposed to higher average noise levels have heightened sympathetic arousal, expressed by increased stress hormone levels, and elevated resting blood pressure. Without mitigation, the Project might expose community members to levels of noise that are unsafe for cardiovascular health, mental health, societal well being, and child development.

The noise study performed with the Initial Study concluded that the existing ambient noise levels in the community already vastly exceed those at which residential development is permitted in the City of Los Angeles. (Initial Study, Exhibit B, pp. 118, 121.) The State of California does not consider areas with ambient noise levels above 60 dbA acceptable for residential use. (*Id.* at p. 118.) Multi-family residential uses are "normally acceptable" only below 65 dBA. (*Ibid.*) Residential uses up to 70 dBA are permitted only when precautions are taken to reduce indoor noise levels. (*Ibid.*) Even so, the noise study reported average ambient noise levels of 63-75 dBA Leq with maximum noise levels of up to 94 dBA Leq. If the Project will contribute to *any* increase in community noise levels, the Project will have significant cumulative impacts that must be disclosed, analyzed, and mitigated in the EIR. (*Los Angeles Unified School Dist. v. City of Los Angeles* (1997) 58 Cal.App.4th 1019, 1026.) This EIR has failed to do so. The DEIR must be revised to include analysis of the proposed warehouse operations and to include specific, feasible and enforceable mitigation that protects sensitive receptors that reside as close as 153 feet away.

Conclusion

As proposed, the warehouse project would have significant and unavoidable E7-13

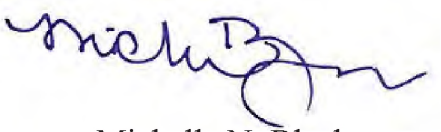
adverse impacts on a community already facing the noise and air pollution of the Alameda Corridor and the City's densest industrial development. Even so, the DEIR fails to consider alternatives to the Project such as a community garden that have broad community support and that would meet the City's economic objectives. Due to the deficiencies outlined above, the DEIR requires revision and recirculation. The South Central Farmers hope that the City's revised DEIR more accurately discloses, analyzes, and mitigates the Project's likely impacts and that it considers alternatives to the Project that will increase, *not decrease*, the quality of life for local families.

E7-13 Cnt'd

Thank you for your consideration of these comments. We join in the comments submitted by the Natural Resources Defense Council and Public Counsel on this draft EIR and hereby incorporate them by reference. In addition, pursuant to Public Resources Code section 21092.2, we hereby request notice of all future meetings and environmental notices issued pursuant to CEQA at this site. We look forward to reviewing the revisions to this draft environmental impact report.

E7-14

Sincerely,



Michelle N. Black



CENTER for BIOLOGICAL DIVERSITY



June 30, 2008

Los Angeles City Hall
Expedited Processing Section
200 N. Spring Street, Room 7th Floor
Los Angeles, CA 90012
Attn: Sarah Rigamat, City Planning Associate
(213) 978-1382

Re: Comments on the Mitigated Negative Declaration and Initial Study for the 41st and Alameda Warehouse Project; Case No. ENV-2008-799-MND, VTT-61482, DIR-2008-841-SPR

Dear Ms. Rigamat:

These comments are submitted on behalf of the Center for Biological Diversity ("Center"), the South Central Farmers Action Fund, Rufina Juarez and Tezozomoc on the Mitigated Negative Declaration ("MND") and Initial Study for the 41st and Alameda Warehouse Project; Case No. ENV-2008-799-MND, VTT-61482, DIR-2008-841-SPR ("the Project"). The Project contemplates the construction of a warehouse facility and distribution center with approximately 643,000 square feet of warehouse and ancillary support space site including 345 parking spaces on 10.04 acres of vacant land that was historically used as a community garden for underserved residents of south central Los Angeles. E7-15

The Center is a non-profit environmental organization working through its Climate Air, and Energy Program to reduce greenhouse gas emissions to protect biological diversity, our environment, and public health. The Center has over 40,000 members including members in the City of Los Angeles who would be negatively impacted by the Project.

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South Central Farmers Action Fund is a nonprofit public benefit corporation and is not organized for the private gain of any person. It is organized under the Nonprofit Public Benefit Corporation Law for public purposes. The specific purpose of the corporation shall be to educate the public and promote the need for and benefits of preserving, maintaining, acquiring, and cultivating farm land in urban areas, and to work with other groups and individuals that promote the need for and benefits of urban farm land throughout California and the United States, and to carry on other public purposes and activities associated with these goals as allowed by law.

E7-15, Cntd

The MND cavalierly dismisses Project impacts on global warming on the grounds that: 1) warehouse demand would require construction someplace else even if the project were not built; and 2) consolidation of existing facilities would not increase fuel consumption. Initial Study at III-80. This type of conclusory analysis is exactly the type of "clearly erroneous or inaccurate" reasoning condemned by the California Environmental Quality Act ("CEQA"). CEQA Guidelines § 15384(a). Indeed, the MND's flawed approach is in direct contravention of guidance by the California Office of Planning and Research calling for the full quantification of greenhouse gas emissions from new development (California Office of Planning and Research 2008). In addition, the City of Los Angeles City Attorney and City Council have also emphasized the importance of analyzing the significance of greenhouse gas emissions through the CEQA process (LA City Council 2008, LA City Attorney 2007). The City Attorney has outlined a proposal to require projects to analyze and mitigate projects subject to discretionary approval under CEQA (LA City Attorney 2007). As the MND has not demonstrated that existing buildings would be demolished and permanently dedicated to non-carbon producing activities such as community open space there is no valid basis to suggest that the Project's emissions are not new emissions. The MND's failure to analyze the Project's contributions to climate change violates CEQA.

E7-16

E7-17

The Project's proposed conversion of vacant land from previous community agricultural use to a large scale warehouse with over 2,500 daily vehicle trips will generate large amounts of diesel and greenhouse gas pollution that must be fully analyzed and mitigated under CEQA. As set forth more fully below, where, as here, the Project would generate additional unmitigated greenhouse gas emissions, there is a fair argument that the Project may have a significant cumulative impact on the environment requiring the preparation of an Environmental Impact Report ("EIR"). Under CEQA, an EIR must be prepared even if the lead agency can point to substantial evidence in the record supporting its determination that no significant effect will occur. *Architectural Heritage Assn. v. County of Monterey*, 122 Cal. App. 4th 1095, 1110 (2004). The lead agency may not dismiss evidence because it believes that there is contrary evidence that is more credible. *Pocket Protectors v. City of Sacramento*, 124 Cal. App. 4th 903, 935 (2005). Either there is substantial evidence showing the possibility of a significant environmental effect or there is not. If there is, then the lead agency must prepare an EIR. *Architectural Heritage Assn.*, 122 Cal. App. 4th at 1109-1110. Importantly, the "fair argument" test "establishes a low threshold for initial preparation of an EIR, which reflects a preference for resolving doubts in favor of environmental review." *Id.* at 1110.

E7-18

As a potential significant impact, the environmental analysis must thoroughly evaluate mitigation measures and alternatives that would reduce the Project's greenhouse gas emissions.

Curbing greenhouse gas emissions to limit the effects of climate change is one of the most urgent challenges of our time. In particular, the following alternatives and mitigation measures should be considered: an alternative that dedicates a significant portion of the project site as community open space, measures that reduce energy use and increase energy efficiency, reduce vehicle miles traveled, generate onsite renewable energy, and provide offsets for emissions that cannot be reduced on site. E7-19

I. PROJECT DESCRIPTION IS INACCURATE AND ITS BASELINE IS FLAWED

Under CEQA, the environmental setting is typically described as physical environmental conditions on the project site as it existed at the time the Notice of Preparation is published. This approach is inappropriate here as the environmental conditions changed deliberately and drastically before the Initial Study/MND was issued. *See Save Our Peninsula Committee v. Monterey County Board of Supervisors*, 87 Cal. App. 4th 99, 125 (2001) ("the date for establishing baseline cannot be a rigid one."). Until its destruction, the project site was used as a community garden. Accordingly, the Project is not just the construction of a warehouse, it is the destruction of a community garden, grading of the project site, and the subsequent construction of a warehouse and supporting facilities. The MND improperly segments these aspects and in doing so, understates Project impacts. E7-20

II. BACKGROUND ON GLOBAL WARMING

Climate change poses enormous risks to California. Scientific literature on the impact of greenhouse gas emissions on California (and the world) is well developed. The environmental analysis for this Project must make a good faith effort at full disclosure and avoid minimizing or discounting the severity of global warming's impacts. *See* Guidelines § 15151; *San Joaquin Raptor/Wildlife Rescue Center v. County of Stanislaus*, 27 Cal.App.4th 713 (1994).

A. Greenhouse Gas Pollution and Global Warming Has a Significant Impact on the Environment

There is no longer credible scientific dispute that the climate is warming. In its most recent assessment, the Intergovernmental Panel on Climate Change ("IPCC") concluded that "[w]arming of the climate is unequivocal, as is now evident from observations of increases in global average air and ocean temperatures, widespread melting snow and ice, and rising mean sea level." (IPCC 2007a). Expressed as a global average, surface temperatures have increased by about 0.74°C over the last hundred years, with 11 of the 12 warmest years on record having occurred in the past 12 years (IPCC 2007a). One consequence of warmer temperatures is an increased likelihood of precipitation falling as rain rather than snow, leading to increased rains, reduced snowpacks, and consequently diminished water resources in summer, when they are most needed (IPCC 2007a). In September 2007, Arctic sea ice plummeted to a record-low level not anticipated by most climate models until 2050, leading scientists to predict that the Arctic could be ice-free in summer by 2030 (National Snow & Ice Data Center 2007).[1] As stated by E7-21

1 Based on the startling loss of sea ice in 2007, some scientists have predicted that "the Artic Ocean could be nearly ice-free at the end of the summer by 2012." Seth Borenstein, *Ominous Arctic Melt Worries Experts*, Associated

Jay Zwally, a climate expert at NASA, "the Arctic is often cited as the canary in the coal mine for climate warming. Now as a sign of climate warming the canary has died" (Kolbert 2007). Other observed consequences of the warming climate include sea level rise, increased frequency of droughts, floods, and heat waves and substantial increases in the duration and intensity of hurricanes (IPCC 2007a).

The IPCC now states with "very high confidence" that most of the warming observed over the past 50 years is the result of human generation of greenhouse gases, including carbon dioxide, methane, and nitrous oxide[2] (IPCC 2007a). The rapid warming observed since the 1970s has occurred in a period when the increase in greenhouse gases has dominated over all other factors (IPCC 2007a). The largest known contribution to global warming is from carbon dioxide (IPCC 2007a). Fossil fuel combustion is responsible for more than 75% of human-caused carbon dioxide emissions with the remainder due to land-use change (primarily deforestation) (IPCC 2007a). The global atmospheric concentration of carbon dioxide has increased from a pre-industrial value of about 280 parts per million (ppm) to 379 ppm in 2005, a level that has not been exceeded during the past 650,000 years (during which carbon dioxide concentrations remained between 180 and 300 ppm) and probably during the last 20 million years (IPCC 2007a; Canadell et al. 2007). In 2006, carbon dioxide concentrations reached a new high of 381.2 ppm (World Metrological Organization 2007). As greenhouse gas concentrations increase, more heat reflected from the earth's surface is absorbed by these greenhouse gases and radiated back into the atmosphere and to the earth's surface.[3] Consequently, the higher the level of greenhouse gas concentrations, the larger the degree of warming experienced.

E7-21 Cont.

At current growth rates and continued reliance on fossil fuels, atmospheric concentrations of carbon dioxide would likely exceed 1,000 ppm by the end of the century, resulting in an average global temperature increase of more than 5°C (United Nations Foundation & Sigma XI 2007). This is equivalent to the change in temperature since the last ice age – an era in which Europe and North America was under more than one kilometer of ice (United Nations Foundation & Sigma XI 2007). The growing consensus among climate scientists is that the threshold for dangerous climate change, whereupon a potential "tipping point" is reached and ecological changes become dramatically more rapid and out of control, is estimated at a temperature increase of around 2°C from pre-industrial levels, or an atmospheric concentration of carbon dioxide of approximately 450 ppm (United Nations Foundation & Sigma XI 2007; IPCC 2007c). In 2006, Dr. James E. Hansen, Director of the NASA Goddard Institute for Space Studies, and NASA's top climate scientist, stated: "In my opinion there is no significant doubt (probability > 99%) that . . . additional global warming of 2° C would push the earth beyond the tipping point and cause dramatic climate impacts including eventual sea level rise of at least several meters, extermination of a substantial fraction of the animal and plant species on the

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Press, Dec. 11, 2007.

2 *IPCC, 2007: Summary for Policymakers, in* CLIMATE CHANGE 2007: THE PHYSICAL SCIENCE BASIS, CONTRIBUTION OF WORKING GROUP I TO THE FOURTH ASSESSMENT REPORT OF THE INTERGOVERNMENTAL PANEL ON CLIMATE CHANGE at 4 (Susan Solomon et al. eds., Cambridge Univ. Press 2007) at 2-3. "Very high confidence" is defined at "at least a 9 out of 10 chance of being correct." *Id.* at 3 n.7.

3 Greenhouse gases have a warming effect because, when solar radiation is reflected by the earth, greenhouse gases capture this thermal radiation and reradiate it back to earth, much like the effect of a common garden greenhouse resulting in the "greenhouse effect."

planet, and major regional climate disruptions" (Hansen et al. 2006). More recently however, given the recent unpredicted and extreme rate of loss of arctic ice observed in 2007, Dr. Hansen concluded that "the safe upper limit for atmospheric CO_2 is no more than 350 ppm" (McKibben 2007). Moreover, according to Hansen, just 10 more years of "business-as-usual" global emissions will make it difficult, if not impossible, to keep atmospheric concentrations of greenhouse gases at levels necessary to avoid a temperature increase above 2°C (Hansen et al. 2007).

Keeping the climate within the 2°C threshold requires significant reductions in the world's greenhouse gas emissions. To reach this objective, it is estimated that developed countries would have to target an emissions peak between 2012 and 2015, with 30 percent cuts by 2020 and 80 percent cuts from 1990 levels by 2050 (United Nations Foundation & Sigma XI 2007). In recognition of need for immediate action, California has committed itself though Executive Order S-3-05 and the California Global to reduce the state's emissions to 1990 levels by 2020 and by 80% reductions from 1990 levels by 2050. Ca. Health & Safety Code § 38550; Cal. Executive Order S-3-05 (2005).

The costs of taking no action to reduce greenhouse gas emissions far outweigh the costs of stabilizing emissions. The Stern Review of the Economics of Climate Change, a comprehensive report commissioned by the British government, recently concluded that allowing current emissions trajectories to continue unabated would eventually cost the global economy between 5 to 20 percent of GDP each year within a decade, or up to $7 trillion, and warned that these figures should be considered conservative estimates (Stern 2006). By contrast, measures to mitigate global warming by reducing emissions were estimated to cost about one percent of global GDP each year, and could save the world up to $2.5 trillion per year (Stern 2006). The Stern Report determined that if no action is taken to control greenhouse gas emissions, each ton of CO_2 emitted causes damage worth at least $85 (Stern 2006).

E7-21 Cont.

B. Impacts to California from Global Warming

The California Climate Change Center ("CCCC") has evaluated the present and future impacts of climate change to California and the project area in research sponsored by the California Energy Commission and the California Environmental Protection Agency (Cayan et al. 2007). The severity of the impacts facing California is directly tied to atmospheric concentrations of greenhouse gases (Cayan et al. 2007; Hayhoe et al. 2004). According to the CCCC aggressive action to cut greenhouse gas emissions today can limit impacts, such as loss of the Sierra snow pack to 30%, while a business-as-usual approach could result in as much as a 90% loss of the snowpack by the end of the century. As aptly noted in a report commissioned by the California EPA:

> Because most global warming emissions remain in the atmosphere for decades or centuries, the choices we make today will greatly influence the climate our children and grandchildren inherit. The quality of life they experience will depend on if and how rapidly California and the rest of the world reduce greenhouse gas emissions (Cayan et al. 2007).

Some of the types of impacts to California and estimated ranges of severity – in large part dependent on the extent to which emissions are reduced – are summarized as follows:

- A 30 to 90 percent reduction of the Sierra snowpack during the next 100 years, including earlier melting and runoff.
- An increase in water temperatures at least commensurate with the increase in air temperatures.
- A 6 to 30 inch rise in sea level, before increased melt rates from the dynamical properties of ice-sheet melting are taken into account.
- An increase in the intensity of storms, the amount of precipitation and the proportion of precipitation as rain versus snow.
- Profound impacts to ecosystem and species, including changes in the timing of life events, shifts in range, and community abundance shifts. Depending on the timing and interaction of these impacts, they can be catastrophic.
- A 200 to 400 percent increase in the number of heat wave days in major urban centers.
- An increase in the number of days meteorologically conducive to ozone (O_3) formation.
- A 55 percent increase in the expected risk of wildfires (Cayan et al. 2007).

By providing details as to the ranges of proposed impacts, and indicating that the higher-range of impact estimates are projected if greenhouse gas emissions continue to increase under a "business as usual" scenario, decision-makers and the public will be better informed of the magnitude of the climate crisis and the urgency with which it must be addressed.

Finally, the MND should also include a brief discussion of other laws to address climate change, including California's mandate to reduce emissions to 1990 levels by 2020 and goal of further reducing emissions to 80% below 1990 levels by 2050. Achievement of state mandated emissions reductions will be severely impeded if agencies across the state continue to approve *new* projects without incorporating measures to reduce the added emissions created by these

E7-21 Cntd

III. THE MND MUST INCLUDE AN INVENTORY AND ANALYSIS OF THE PROJECT'S PROJECTED GLOBAL WARMING POLLUTION

The first step in determining a project's global warming pollution impact is to complete a full inventory of all emissions sources that contribute to global warming. In conducting such an inventory, all phases of the proposed project must be considered. *See* 14 Cal. Code Regs. § 15126. The greenhouse gas inventory for a project must include a complete analysis of all of a project's substantial sources of greenhouse gas emissions, from building materials and construction emissions to operational energy use, vehicle trips, water supply and waste disposal. Importantly, OPR has also stated that "lead agencies should make a good-faith effort, based on available information, to calculate, model, or estimate the amount of CO_2 and other GHG emissions from a project, including the emissions associated with vehicular traffic, energy consumption, water usage and construction activities." (California Office of Planning and

E7-22

Research 2008). Contrary to OPR Guidance, the MND fails to quantify emissions from any of these sources. E7-22 Cnt'd

A greenhouse gas inventory for the project must include the project's direct and indirect greenhouse gas emissions. *See* 14 Cal. Code Regs § 15358(a)(1) (Indirect or secondary effects may include effects related to induced changes in the pattern of land use, population density, or growth rate, and related effects on air and water and other natural systems, including ecosystems.). Consequently, a complete inventory of a project's emissions should include, at minimum, an estimate of emissions from the following:

- Fugitive emissions of greenhouses gases, such as methane, from the proposed project;
- Emissions during construction from vehicles and machinery;
- Manufacturing and transport of building materials;
- Electricity generation and transmission for the heating, cooling, lighting, and other energy demands of the project;
- Water supply and transportation to the project;
- Vehicle trips and transportation emissions generated by the project;
- Wastewater and solid waste storage or disposal, including transport where applicable; and
- Outsourced activities and contracting.

E7-23

Methodologies are readily available to inventory the emissions from the proposed project. In its recent white paper, CEQA & Climate Change, Evaluating and Addressing Greenhouse Gas Emissions from Projects Subject to the California Environmental Quality Act (Jan. 2008), the California Air Pollution Control Officers Association (CAPCOA) sets forth methodologies for analyzing greenhouse gas pollution (CAPCOA 2008) (See Table 1. CEQA and Greenhouse Gas Emissions Methodologies). In its Guidance, OPR also provides references to methodologies to quantify greenhouse gas emissions. In addition to the methodologies set forth by CAPCOA and OPR, ICLEI's Clean Air/Climate Protection (CACP) software allows cities to calculate emissions reductions, track and quantify emission outputs, and develop emissions scenarios to inform the planning process.[4] As noted in the ICLEI Climate Action Handbook, "Expertise in climate science is not necessary" to conduct an emissions inventory and compare this inventory against a forecast year (ICLEI).[5] "A wide range of government staff members, from public

E7-24

4 ICELI's Clean Air/Climate Protection software is available at http://www.cacpsoftware.org/ ICLEI-Local Governments for Sustainability is an international association of more than 650 local governments. Cities, counties, towns and villages around the world are members of ICLEI. Since 1993, ICLEI and has grown from a handful of local governments participating in a pilot project to more than 300 who are providing national leadership on climate protection and sustainable development. ICLEI's mission is to improve the global environment through local action. On the issue of global warming, for example, ICLEI provides resources, tools, peer networking, best practices, and technical assistance to help local governments measure and reduce greenhouse gas emissions in their communities.
5 Indeed, the amount from sources such as vehicle trips, electricity, and natural gas use can be readily calculated using standard emissions factors. For example, burning one gallon of gasoline in a car produces 8.87 kg CO_2. Each cubic meter of natural gas burned for heat produces 1.93 kg CO_2. And the average kWh of electricity purchased in California required .61 lbs of CO_2 to produce. These and other emissions factors are available online at http://www.wri.org/climate/pubs_description.cfm?pid=3756.

works to environment and facilities departments, can conduct an inventory" (ICLEI). ICLEI provides technical assistance and training to local government using the CACP software.

E7-24, Cntd

It is incumbent on the City "disclose all it can" about project impacts and educate itself on methodologies that are available to measure project emissions. *Berkeley Keep Jets Over the Bay Comm. v. Board of Port Comm'rs ("Berkeley Jets")*, 91 Cal. App. 4th 1344, 1370 (2001). Without a complete inventory, the MND cannot adequately inform the public and decision-makers about the Project's impacts. Similarly, without a complete inventory and analysis of greenhouse gas emissions that will result from the project, there is simply no way that the MND can then adequately discuss avoidance, and mitigation measures to reduce those impacts.

E7-25

A. As Part of its Inventory of Global Warming Pollution, the MND Must Also Analyze Black Carbon Emissions Resulting from the Project

(1) Background: Black Carbon Has a Significant Impact on Global Warming and as a Short-Lived Pollutant, Mitigation Can Provide Immediate Significant Climate and Health Benefits

As part of its analysis of global warming impacts, the MND must also address black carbon, an important short-lived pollutant that contributes to global and regional warming. Black carbon is produced by incomplete combustion and is the black component of soot. Although combustion produces a mixture of black carbon and organic carbon, the proportion of black carbon produced by burning fossil fuels, such as diesel, is much greater than that produced by burning biomass.

Black carbon heats the atmosphere through a variety of mechanisms. First, it is highly efficient at absorbing solar radiation and in turn heating the surrounding atmosphere. Second, atmospheric black carbon absorbs reflected radiation from the surface. Third, when black carbon lands on snow and ice, it reduces the reflectivity of the white surface which causes increased atmospheric warming as well as accelerates the rate of snow and ice melt. Fourth, it evaporates low clouds. Notably, black carbon is often complexed with other aerosols such as sulfates, which greatly increases its heating potential. (Ramanathan & Carmichael 2008; Jacobson 2001).

E7-26

Due to black carbon's short atmospheric life span and high global warming potential, decreasing black carbon emissions offers an opportunity to mitigate the effects of global warming trends in the short term. (Ramanathan & Carmichael 2008). Black carbon is considered a 'short-lived pollutant' (SLP) because it remains in the atmosphere for only about a week in contrast to carbon dioxide, which remains in the atmosphere for over 100 years. Furthermore, the global warming potential of black carbon is approximately 760 times greater than that of carbon dioxide over 100 years (Reddy & Boucher 2007) and approximately 2200 times greater over 20 years (Bond & Sun 2005). It is estimated that black carbon is the second greatest contributor to global warming behind carbon dioxide. (Ramanathan & Carmichael 2008).

Unlike traditional greenhouse gases, which become relatively uniformly distributed and mixed throughout the Earth's atmosphere, black carbon exerts a regional influence. The impacts of black carbon on a regional level include both atmospheric heating, as discussed above, and hydrological changes. Hydrological changes occur due to alterations in cloud formation and heat gradients. (Id.). For instance, aerosol pollution has been linked to decreases in the summer monsoon season in tropical areas as well as the drought in the Sahel region of Africa. (Id.). California is an area of particular concern because of the drought-fire cycle. The more drought conditions prevail, the more forest fires burn, and the forest fires in turn emit massive quantities of black and organic carbon. The release of these aerosols intensifies the drought effect.

Another impact of black carbon is accelerated snowmelt; for instance, black carbon is likely contributing to the retreat of Himalayan glaciers and the resulting water shortage in areas of Asia. (Id.). When black carbon settles on snow, it makes the snow darker so that it absorbs more solar radiation. This directly leads to snow melt. In addition, local atmospheric heating due to black carbon increases the melting rate. These same effects may well be operating on the Sierra Nevada, which would reduce water availability throughout California at crucial times of the year. These localized impacts could also be contributing to a decreased snow pack and earlier snow melt for the San Gabriel, San Bernardino, and San Jacinto mountains.

E7-26, Cntd

Black carbon is also detrimental to human health. Black carbon has been linked to a variety of circulatory diseases. One study found an increased mortality rate was correlated with exposure to black carbon. (Maynard 2007). The same is true for heart attacks. (Tonne 2007). Another study found that residential black carbon exposure was associated with increased rates of infant mortality due to pneumonia, increased chronic bronchitis, and increased blood pressure. (Schwartz 2007).

In developed countries, diesel burning is the main source of black carbon. Diesel emissions include a number of compounds such as sulfur oxides, nitrogen oxides, hydrocarbons, carbon monoxide, and particulate matter. Diesel particulate matter is approximately 75% elemental carbon. (EPA 2002 Diesel Health Assessment) The proposed project will require the use of diesel-powered heavy duty trucks, construction equipment, and yard/warehouse equipment. Thus, it is crucial that black carbon be addressed as part of the environmental review for the Project.

(2) Analyzing Particulate Matter is Insufficient to Address Black Carbon

Particulate matter (PM) refers to the particles that make up atmospheric aerosols. The primary constituents of PM are sulfates, nitrates, and carbon compounds. Sulfates and nitrates form in the atmosphere from the chemical reaction of sulfur and nitrogen dioxides. These may often be present as ammonium sulfate or nitrate salts. Carbon compounds may be directly emitted, e.g. black carbon emitted from combustion, or may form in the atmosphere from other organic vapors, e.g. oxidation of volatile organic compounds.

E7-27

Because PM can be reduced through mitigation of other constituents of PM than black carbon, it is essential that black carbon emission reduction strategies be considered

independently from PM reductions. The proportions of the constituents of PM vary over time and by location. (See EPA 2004 Particle Pollution Report). According to a recent series of surveys conducted at various U.S. cities under the EPA's "Supersite" program, black carbon was often only about 10% of total measured $PM_{2.5}$.[6]

E7-27, Cntd

In contrast to total $PM_{2.5}$, diesel PM is composed largely of black carbon. Nonetheless, some diesel PM reduction strategies do not affect black carbon. For instance, diesel oxidation catalysts can reduce diesel PM emissions as a whole by approximately 20 to 40%, yet they do not decrease black carbon emissions. (Walker 2004). In addition, while low-sulfur fuel will reduce sulfate emissions, in and of itself low-sulfur fuel will not reduce black carbon. Low-sulfur fuel is important because it *allows* for better technology to reduce black carbon. (*See, e.g.* 69 Fed. Reg. 38957, 38995 (June 29, 2004)). Yet those reductions can only occur once the technology has been implemented.

E7-28

(3) Methods Are Available to Specifically Quantify Black Carbon Emissions from the Project

Like greenhouse gases, black carbon emissions from various types of engines and activities can be estimated through numerical calculations. (Bond 2004). Thus, there is no reason why black carbon can reasonably be omitted from these estimates.

The estimated black carbon emissions from the project can be inventoried similarly to other greenhouse gas emissions:

- Estimate the mass of diesel fuel consumed by each type of diesel engine, e.g. ship, machinery, truck, construction equipment, and locomotive.
- Calculate a black carbon emission factor (EF) using reference values available in the literature. For instance, Bond and colleagues provide an equation for "EF_{BC}" from various types of diesel engines that takes into account 4 different factors.7
- Multiply the emission factor times the mass of diesel (in kilograms) used for each engine type. This will provide the grams of black carbon emitted by that engine type.
- Sum all black carbon emissions from each engine category to obtain total black carbon emissions from the project.

E7-29

After obtaining the total black carbon emissions from the project, the relative global warming impact of the emissions can be compared to other global warming pollutants. Carbon dioxide-equivalent values can be obtained by multiplying total black carbon emissions (in kilograms) from the project by the global warming potential (GWP) for black carbon. Although there is some variation in estimated GWP values, representative black carbon GWP values are: 760 over 100 years[8] or 2200 over 20 years (Bond & Sun 2005).

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6 For an overview of the program and initial results see http://www.epa.gov/ttn/amtic/supersites.html
7 See Bond et al. 2004 at 4 and Table 7.
8 The combined global average direct (480) and indirect (281) GWP for black carbon as reported in Reddy & Boucher (2007).

IV. THE MND MUST DETERMINE THE CUMULATIVE SIGNIFICANCE OF THE PROJECT'S GREENHOUSE GAS POLLUTION ON GLOBAL WARMING IMPACTS

After fully quantifying Project emissions, the MND must determine the cumulative significance of the Project's greenhouse gas pollution. As the lead agency, CEQA requires the City to determine the significance of the Project's emissions with or without established significance thresholds. Guidelines § 15064. Importantly, a universally adopted methodology is *not* necessary to analyze project impacts. *Berkeley Keep Jets*, 91 Cal. App. 4th at 1370 ("the fact that a single methodology does not exist...requires the [respondent] to do the necessary work to educate itself about the different methodologies that *are* available."). As OPR has noted, "[l]ead agencies should not dismiss a proposed project's direct and/or indirect climate change impacts without careful consideration, supported by substantial evidence." (Office of Planning and Research 2008 at 6.) Here, the Project's circular reasoning that emissions would simply be generated elsewhere does not constitute substantial evidence.

To the contrary, the greenhouse gas emissions generated by a project of this size and scope will have a clearly significant cumulative impact. An impact is considered significant where its "effects are individually limited but cumulatively considerable." Guidelines § 15065(a)(3). Climate change is the classic example of a cumulative effects problem; emissions from numerous sources combine to create the most pressing environmental and societal problem of out time. *Ctr. for Biological Diversity v. Diversity v. NHTSA*, 508 F.3d 508, 550 (9th Cir. 2007), ("the impact of greenhouse gas emissions on climate change is precisely the kind of cumulative impacts analysis that NEPA requires agencies to conduct."); *Kings County Farm Bureau v. City of Hanford*, 221 Cal. App. 3d 692, 720 (1990) ("Perhaps the best example [of a cumulative impact] is air pollution, where thousands of relatively small sources of pollution cause a serious environmental health problem."). While a particular project's greenhouse gas emissions represent a fraction of California's total emissions, courts have flatly rejected the notion that the incremental impact of a project is not cumulatively considerable because it is so small that it would make only a *de minimis* contribution to the problem as a whole. *Communities for a Better Env't v. California Resources Agency*. 103 Cal. App. 4th 98, 117 (2002); *see also Kings County Farm Bureau v. City of Hanford*, 221 Cal. App. 3d 692, 720 (1990) ("Perhaps the best example [of a cumulative impact] is air pollution, where thousands of relatively small sources of pollution cause a serious environmental health problem."). E7-30

Under CEQA, "[t]he determination of whether a project may have a significant effect on the environment calls for careful judgment on the part of the public agency involved, based to the extent possible *on scientific and factual data*." CEQA Guidelines § 15064(b) (emphasis added). Accordingly, a significance threshold for greenhouse gases must reflect the grave threats posed by the cumulative impact of additional new sources of emissions into an environment where deep reductions from existing emission levels are necessary to avert the worst consequences of global warming. *See Communities for Better Env't v. California Resources Agency,* 103 Cal. App. 4th 98, 120 (2002) ("the greater the existing environmental problems are, the lower the threshold for treating a project's contribution to cumulative impacts as significant.").

The failure to immediately and significantly reduce emissions from existing levels will result in devastating consequences for the economy, public health, natural resources, and the environment. Based on the scientific and factual data, thresholds that are not highly effective at reducing emissions are inadequate in the face of the profound threats posed by global warming. Moreover, CEQA requires that a lead agency must "still consider any fair argument that a certain environmental effect may be significant" even where a project complies with a regulatory threshold. *Protect the Historic Amador Waterways v. Amador Water Agency*, 116 Cal. App. 4th 1099, 1109 (2004). CAPCOA provides various means by which a lead agency can determine the significance of project emissions (CAPCOA 2008). Reliance on a threshold that is not highly effective at reducing greenhouse gas emissions or is inconsistent with mandated emission reductions leaves projects open to legal challenge under the fair argument standard because there is a fair argument that application of a threshold with limited effectiveness at reducing emissions would still result in environmental effects, Therefore, thresholds that are not highly effective in reducing emissions or are inconsistent with mandated emissions reductions still create a significant impact. E7-31

Under CAPCOA's own analysis, the only two thresholds that are highly effective at reducing emissions and highly consistent with AB 32 and Executive Order S-3-05 are a threshold of zero or a quantitative threshold designed to capture 90 percent or more of likely future discretionary projects (a 900-ton CO_2 Eq threshold). (CAPCOA 2008 at 56-57.) According to CAPCOA, 900 tons is roughly the equivalent of the emissions generated by 50 homes or 30,000 square feet of commercial space. (*Id.* at 43.) While the emissions from these projects might ordinarily seem minor enough to ignore, the challenges posed by climate change are far from ordinary. Given the recent extreme losses in arctic sea ice, scientists at the National Snow and Ice Data Center have concluded that "the observed changes in the arctic indicate that this feedback loop is now starting to take hold."[9] Even the ambitious emissions reduction targets set by Executive Order S-3-05 in 2005, which were consistent with contemporaneous science indicating that reductions of 80% below 1990 levels by developed countries were sufficient to stabilize the climate,[10] are now believed to be insufficient. Based on the alarming and unpredicted rate of loss of Arctic sea ice and other recent climate change observations, leading scientists now state that "humanity must aim for an even lower level of GHGs."[11] As our current E7-32

9 National Snow & Ice Data Center, *Arctic Sea Shrinks as Temperatures Rise*, Oct. 3, 2006 available at http://nsidc.org/news/press/2006_seaiceminimum/20061003_pressrelease.html Loss of sea ice is subject to a tipping point because, as sea ice melts in response to rising temperatures, it creates a positive feedback loop: melting ice means more of the dark ocean is exposed, allowing it to absorb more of the sun's energy, further increasing air temperatures, ocean temperatures, and ice melt.

10 Cal. EPA, Climate Action Team Report to Governor Schwarzenegger and the Legislature (Mar. 2006) at 18.

11 Hansen, J. et al., *Target Atmospheric CO_2: Where Should Humanity Aim?* (April 2008) available at http://www.columbia.edu/~jeh1. In *Target Atmospheric CO2: Where Should Humanity Aim?*, James Hansen, the premier NASA climatologist, now concludes that "[i]f humanity wishes to preserve a planet similar to that on which civilization developed, paleoclimate evidence and ongoing climate change suggest that CO_2 will need to be reduced from its current 385 ppm to at most 350 ppm." An emissions pathway whereby developed countries would reduced emissions to 80% below 1990 levels as envisioned under Executive Order S-3-05 would cap atmospheric concentrations of CO_2 at approximately 450 ppm. *See, e..g,* UNDP, Human Development Report 2007/2008, Fighting climate change: Human solidarity in a divided world (2007) at 46-50 available at http://hdr.undp.org/en/reports/global/hdr2007-2008/chapters/

scientific understanding now calls for even greater reductions and indicates that we already may have passed a climactic tipping point, the City should apply a threshold of zero in order to ensure that new projects do not have a cumulatively significant impact on global warming. As noted by the Ninth Circuit in *Center for Biological Diversity v. Nat'l Highway Traffic Safety Admin.*:

> [W]e cannot afford to ignore even modest contributions to global warming. If global warming is the result of the cumulative contributions of myriad sources, any one modest in itself, is there not a danger of losing the forest by closing our eyes to the felling of the individual trees?

E7-32, Cntd

508 F.3d 508, 550 (9th Cir. 2007). Accordingly, the City must unequivocally consider Project emissions to be a potentially significant impact.

V. THE MND MUST ANALYZE AND ADOPT ALL FEASIBLE MITIGATION MEASURES AND ALTERNATIVES TO REDUCE THE PROJECT'S GREENHOUSE GAS EMISSIONS

The MND's failure to recognize the cumulatively significant impacts from the project directly leads to the failure to consider feasible mitigation measures and alternatives to reduce this cumulatively significant impact. CEQA requires agencies to adopt feasible mitigation measures or feasible environmentally superior alternatives in order to substantially lessen or avoid the otherwise significant environmental impacts of a proposed project. Pub. Res. Code §§21002, 21081(a); CEQA Guidelines §§ 15002(a)(3), 15021(a)(2), 15091(a)(1). In the present case the MND erroneously concludes, without substantial evidence, that the Project's improperly narrowed contribution of greenhouse gas emissions is not significant. Because it does not find the emissions significant, the MND fails to require the adoption of feasible mitigation measures or alternatives.

E7-33

CEQA requires that agencies "mitigate or avoid the significant effects on the environment of projects that it carries out or approves whenever it is feasible to do so." Pub. Res. Code § 21002.1(b). Mitigation of a project's significant impacts is one of the "most important" functions of CEQA. *Sierra Club v. Gilroy City Council*, 222 Cal.App.3d 30, 41 (1990). Therefore, it is the "policy of the state that public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures which will avoid or substantially lessen the significant environmental effects of such projects." Pub. Res. Code § 21002. Importantly, mitigation measures must be "fully enforceable through permit conditions, agreements, or other measures" so "that feasible mitigation measures will actually be implemented as a condition of development." *Federation of Hillside & Canyon Ass'ns v. City of Los Angeles*, 83 Cal.App.4th 1252, 1261 (2000).

Importantly, the City should examine an alternative that reverts part of the project site back to a community garden. To the extent that the project moves forward as planned, there are many mitigation measures the City can consider, as described below. This is not an exhaustive list and the MND should explore these and all other feasible mitigation measures that will reduce

E7-34

the project's greenhouse gas emissions (CAPCOA 2008; California Office of the Attorney General 2008).

E7-34, Cntd

Energy Conservation Measures

The MND should consider mitigation measures that will ensure the planned community will use energy efficiently and conservatively. In doing so, it should analyze incorporating "green building" in the development. Green buildings are those buildings that lower energy consumption, use renewable energy, conserve water, harness natural light and ventilation, use environmentally friendly materials and minimize waste (Commission for Environmental Cooperation 2008).

Buildings create environmental impacts throughout their lifecycle, from the construction phase to their actual use to their eventual destruction (Commission for Environmental Cooperation 2008). In the United States, buildings account for 40 percent of total energy use, 68 percent of total electricity consumption, and 60 percent of total non-industrial waste (Commission for Environmental Cooperation 2008). Buildings also significantly contribute to the release of greenhouse gases. In the U.S. they account for 38 percent of total carbon dioxide emissions (Commission for Environmental Cooperation 2008). More specifically, residential buildings cause up to 1,210 megatons of carbon dioxide, while commercial building create approximately 1,020 megatons (Commission for Environmental Cooperation 2008). This is because buildings require a lot of energy for their day to day operations. Most of the coal-fired power plants – one of the biggest sources of greenhouse gas emissions – slated for development in the United States will supply buildings with the energy they need. In fact, 76 percent of the energy these plants produce will go to operating buildings in the U.S. (Commission for Environmental Cooperation 2008).

E7-35

Using green building techniques, however, can substantially reduce buildings' influence in increasing greenhouse gas emissions. Green buildings help reduce the amount of energy used to light, heat, cool and operate buildings and substitute carbon-based energy sources with alternatives that do not result in greenhouse gas emissions (Commission for Environmental Cooperation 2008). Currently green buildings can reduce energy by 30 percent or more and carbon emissions by 35 percent. (Commission for Environmental Cooperation 2008). The technologies available for green building are already in wide-use and include "passive solar design, high-efficiency lighting and appliances, highly efficient ventilation and cooling systems, solar water heaters, insulation materials and techniques, high-reflectivity building materials and multiple glazing (IPCC 2007c). Additionally, the U.S. Green Building Council (USGBC), a private, nonprofit corporation, has established a nationwide green building rating system, called Leadership in Energy and Environmental Design ("LEED"). The LEED standard supports and certifies successful green building design, construction and operations. It is one of the most widely used and recognized systems, and to obtain LEED certification from the USGBC, project architects must verify in writing that design elements meet established LEED goals.

Specific mitigation for the greenhouse gas emissions generated by the Project's energy consumption include, but are not limited to:

E7-36

- Compliance with the City of Los Angeles Green Building Program. LA Municipal Code §§ 16.10, 16.11;
- Analyzing and incorporating the U.S. Green Building Council's LEED (Leadership in Energy and Environmental Design) or comparable standards for energy- and resource-efficient building during pre-design, design, construction, operations and management.
- Designing buildings for passive heating and cooling, and natural light, including building orientation, proper orientation and placement of windows, overhangs, skylights, etc.;
- Designing buildings for maximum energy efficiency including the maximum possible insulation, use of compact florescent or other low-energy lighting, use of energy efficient appliances, etc.;
- Reducing the use of pavement and impermeable surfaces;
- Requiring water re-use systems;
- Installing light emitting diodes (LEDs) for traffic, street and other outdoor lighting;
- Limiting the hours of operation of outdoor lighting;
- Maximizing water conservation measures in buildings and landscaping, using drought-tolerant plants in lieu of turf, planting shade trees;
- Ensure that the Project is fully served by full recycling and composting services;
- Ensure that the Project's wastewater and solid waste will be treated in facilities where greenhouse gas emissions are minimized and captured;
- Installing the maximum possible photovoltaic array on the building roofs and/or on the project site to generate all of the electricity required by the Project, and utilizing wind energy to the extent necessary and feasible;
- Installing solar water heating systems to generate all of the Project's hot water requirements;
- Installing solar or wind powered electric vehicle and plug-in hybrid vehicle charging stations to reduce emissions from vehicle trips.

E7-36, Cntd

Mitigation Related to Project Construction

- Utilize recycled, low-carbon, and otherwise climate-friendly building materials such as salvaged and recycled-content materials for building, hard surfaces, and non-plant landscaping materials;
- Minimize, reuse, and recycle construction-related waste;
- Minimize grading, earth-moving, and other energy-intensive construction practices;
- Landscape to preserve natural vegetation and maintain watershed integrity;
- Utilize alternative fuels in construction equipment and require construction equipment to utilize the best available technology to reduce emissions.

Transportation Mitigation Measures

- Encourage and promote ride sharing programs. This might be achieved by creating a specific percentage of parking spaces for ride sharing vehicles;
- Incorporate public transit into the project design;

- Create a car sharing program within the planned community;
- Create a light vehicle network, such as a neighborhood electric vehicle (NEV) system;
- Provide necessary facilities and infrastructure to encourage residents to use low or zero-emission vehicles, for example, by developing electric vehicle charging facilities and conveniently located alternative fueling stations;
- Provide a shuttle service to public transit within and beyond the planned community;
- Incorporate bicycle lanes and routes into the planned community's street systems.

E7-36, Cnt'd

Mitigation Targeting Black Carbon Emissions

One of the first steps towards reducing black carbon is to develop a proper monitoring and reporting system. As discussed above, black carbon must be considered separately from PM.

The project should monitor and make publicly available the daily concentrations of black carbon. This can be accomplished using measuring devices called *aethalometers*, which are commercially available and simple to operate.[12] An aethalometer is an electronic box. It works by measuring the attenuation of light in certain wavelengths of particles that collect as air passes through a filter.[13] The units come in rack-mounted as well as portable versions.

Detect and Mitigate "Superemitters": Some engines that receive poor maintenance or have mechanical difficulties emit 10 to 15 times the average levels of black carbon. (Bond 2004). While these may be older engines, engine age is not the single indicator of emissions levels. A single superemitter can negate the positive reductions achieved through retrofitting or replacing a number of "average" diesel engines. Therefore, it is essential to add a mitigation measure that requires the project proponents to develop a monitoring system to detect diesel engines of all varieties that emit high levels of black carbon.

E7-37

A potential monitoring device is the new AE90 aethalometer which has a tailpipe monitoring extension. (See presentation by T. Hansen of Magee Scientific). Periodic measurement of vehicles using this device should be required. An incentive program could be created to help vehicle operators rapidly and effectively mitigate the emissions from superemitting vehicles.

Schedule Deliveries to Reduce Truck Idling Time: Current California regulations require heavy-duty truck engines to be turned off after idling for 5 minutes. (13 C.C.R. § 2485). This rule, however, does not apply when the truck is in traffic or queuing. (13 C.C.R. § 2485(c)(2)). Idling time due to either of these events can be avoided by careful scheduling on the part of the project proponent. Therefore, the project should be required to develop a delivery schedule that maximally avoids both traffic en route and waiting time at the facility.

E7-38

12 See http://www.mageesci.com/ (one of the companies that mass produces aethalometers).
13 See the Magee Science Aethalometer Owner's Manual available at:
http://www.mageesci.com/support/downloads/Aethalometer_book_2005.07.03.pdf

Require all Heavy-duty Diesel Delivery Vehicles to Reduce Black Carbon Emissions: Over 80% of the U.S. depends on heavy-duty diesel trucks to deliver their goods. (See American Trucking Industry Fact Sheet). Furthermore, a new 2008 truck has only one-tenth of the fine PM emissions of a 2006 truck. (Id.). This pair of facts shows that it is essential to address black carbon from delivery trucks.

Because black carbon is a component of diesel PM, some strategies that reduce PM will also reduce black carbon. One of the most common options is the use of a catalyzed diesel particulate filter, which can be installed on both new and existing diesel engines. (See generally 69 Fed. Reg. 38957 (June 29, 2004)). The California Air Resources Board (CARB) recently proposed a rule that would require in-use heavy duty diesels to reduce their PM emissions.[14] Although the rule is not in effect yet, the project should aim to achieve the standards in the rule beginning immediately by requiring the companies that deliver goods to install technology such as diesel particulate filters on their delivery trucks. E7-39

Require All Mobile Cargo Handling Equipment to Comply With the Emissions Standards for Port Equipment: Similar to heavy-duty on-road diesel engines, reductions in PM emissions from cargo handling equipment can also reduce black carbon. California law currently requires mobile cargo handling equipment, e.g. forklifts and loaders, located at ports or intermodal railyards to reduce their PM emissions to comply with California's on-road diesel standards or with EPA's Tier 4 standards for off-road vehicles. (13 C.C.R. § 2497). The existence of such a rule for ports is clear evidence that compliance is also feasible in the contexts of warehouses. Thus, the proposed project must reduce its black carbon emissions by requiring that all cargo handling equipment comply with the rule for port equipment. E7-40

Accelerate Compliance Schedules: Because black carbon pollution causes rapid and significant atmospheric heating as well as substantial human health risks, it is necessary to address this pollutant as rapidly as possible. A variety of regulations, as discussed above, will require reduced diesel emissions. The schedule for compliance with these standards, however, is often many years from the date of enactment. The project should create incentives for early compliance with all regulatory reduction measures so that black carbon can be reduced as rapidly as possible. E7-41

Carbon Offsets

After all measures have been implemented to reduce emissions in the first instance, remaining emissions that cannot be eliminated may be mitigated through offsets. Care should be taken to ensure that offsets purchased are real (additional), permanent, and verified, and all aspects of the offsets should be discussed in the MND. As stated by CAPCOA, a potential cost-effective offset and verifiable offset could include an energy-efficient retrofit of existing building stock in the Project area to offset the remainder of the Project's emissions. (CAPCOA 2008 at E7-42

14 http://www.arb.ca.gov/msprog/onrdiesel/onrdiesel.htm

80.) As demonstrated by the Office of the Attorney General offsets are a feasible CEQA mitigation measures. In a recent settlement with the Attorney General regarding the mitigation of greenhouse gas emissions from a proposed refinery expansion, ConocoPhillips Co. agreed to make a one-time payment of $7 million to a carbon offset fund created by the Bay Area Air Quality Management District "to achieve verifiable quantifiable reductions in GHG emission, with priority given to projects near" the project area.[15] The Settlement also provided $2.8 million to fund reforestation and conservation projects and $200,000 for restoration of the San Pablo Bay wetlands. Offsetting GHG emissions in the project area, including reductions and offsets at existing warehouses that were referenced in the Initial Study, could also yield corollary benefits, such as reductions in criteria pollutants. Because the MND does not offset the remainder of the Project's greenhouse gas emissions, the Project's impacts have not been fully mitigated. Absent full mitigation, the City must prepare an EIR to evaluate Project greenhouse gas emissions.

E7-42, Cntd

II. CONCLUSION

For the reasons set forth above, because there is a fair argument that the Project will have significant environmental impacts, the City must prepare an EIR for the Project. Please do not hesitate to contact Matthew Vespa at (415) 436-9682 x.309, mvespa@biologicaldiversity.org, or Jonathan Evans (213)598-1466, jevans@biologicaldiversity.org, if you have any questions regarding these comments. Thank you for your time and consideration of our concerns.

E7-43

Sincerely,

Matthew Vespa
Staff Attorney

Jonathan Evans
Staff Attorney

cc:

Antonio Villaraigosa
Honorable Mayor of Los Angeles
200 N. Spring Street, Room 303
Los Angeles, CA 90012

Councilwoman Jan Perry

15 Settlement Agreement between ConocoPhillips Co. and the California Attorney General, Sept. 10, 2007.

200 N. Spring Street, Room 420
Los Angeles, CA 90012

Enc: The following references are included for your review and inclusion in the administrative record.

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LETTER E8

RECEIVED
CITY OF LOS ANGELES
MAR 10 2015
ENVIRONMENTAL
UNIT

Hola mi nombre es Silvia Borges

He vivido en la Ciudad de Los Angeles por 25 años

Yo he trabajado en la compañía Impact desde el 2003, fui contratada al principio como trimiadora después fui asendida como chequeadora al pasar el tiempo fui manager del area y ahora mi labor es payroll.

El trabajar en esta compañia me a ayudado a darle un buen estudio a mi hijo y a poder salir adelante en la vida, mis compañeros son muy buenos el patron es ena exelente persona y pues yo siempre me he sintido muy bien trabajondo en impact.

Estoy feliz y contenta de ser parte de esta compañia, por que es un orgullo ver en las tiendas la produccion que asemos, y ver personas con la ropa que se labora en nuestra compania.

Gracias.

E8-1

LETTER E9

ALAMEDA 24TH STREET, LLC

11766 Wilshire Boulevard, Suite 820 • Los Angeles, California 90025 • Phone 310-582-1991 • Fax 310-582-1999

March 2, 2015

Srimal Hewawitharana
Environmental Specialist II
Los Angeles City Planning Department
EIR Analysis Section
Department of City Planning
200 N. Spring Street, Room 750
Los Angeles, CA 90012

email: srimal.hewawitharana@lacity.org

Re: Alameda Industrial Project Site Plan Review and Case Number ENV-2012-920-EIR, AA-2012-919-PMLA, DIR-2013-887-SPR, and State Clearinghouse Number 2014061030

Dear Srimal Hewawitharana:

We previously sent a letter to Christina Toy Lee in the Planning Department on June 25, 2013 regarding the above referenced industrial development project on the south west corner of Alameda Street and E. Martin Luther King Jr. Boulevard in the City of Los Angeles. We have updated our previous letter to account for a modified site plan and the information contained in the draft EIR.

We are the owner of an approximate 18 acre parcel located directly adjacent to the subject property with frontage on the north side of E. Martin Luther King Jr. Boulevard, directly adjacent to the proposed development. Our land is built out with approximately 500,000 square feet of industrial space in a master planned business park setting. We want to go on record that we want to see the site developed as a thoughtful industrial project, but we have several concerns with the proposed development as outlined below. E9-1

The first and main concern is related to the very high Floor to Area Ratio ("FAR") and the inadequacy of parking to support the proposed square footage and design. The site plan is proposed to contain 481,022 SF of buildings on a land area of 546,921 SF, representing an FAR of approximately 88%. E9-2 There are 368 parking stalls proposed with is equivalent to a parking ratio of .77 per 1,000 square feet. E9-3 If this was a high cube distribution building with 2-3% office build out, then that might be practical. However, these 4 buildings are depicted on the site plan as divisible into 12 different suites containing an average office and mezzanine build out of 24.2%. Approximately 50% of the mezzanine space is classified on the site plan as "warehouse space" even though it is highly likely to be converted into office use at a later date thereby requiring much more parking than now provided. Even more likely, the mezzanine space will never be used for warehouse purposes as this would require elevators, and it will become offices from the start. E9-4 In addition, some of the suites depicted on the site plan (the middle two units in building #1 for example) do not contain any first floor office build out even though there is a storefront entrance on the first floor for a separate occupant. We are concerned that the office use of this project, whether initially or eventually, is understated on the site plan and there is not adequate parking proposed to accommodate this design.

The second concern is that given the site plan design, all ingress and egress is on Martin Luther King Jr. Blvd. and 41st Street with no entrances on Alameda Street or Long Beach Avenue. Because of the site design, we question whether a 5 foot additional street dedication on Martin Luther King Jr. Blvd. is E9-5

sufficient. We ask that the City pay particular attention to the widening dedication on Martin Luther King Jr. Blvd.

E9-5 Cnt'd

The third concern is that the design of the complex lends itself to truck stacking in the street rather than internal to the project. For example, all truck loading positions are located directly in front of street curb cuts and the proposed building face is only around 70 feet from the curb. We recognize that there are internal truck wells in addition to the 70 feet, however, these trucks are going to need to back into these positions, and there does not seem to be enough room to do it onsite without trucks cueing in the street. The combination of dock doors in front of the curb cuts and very high site coverage / FAR compounds this problem.

E9-6

The fourth and last concern is that we want to make sure that the project is attractive in nature and has a reasonable amount of landscaping, especially on the Martin Luther King Jr. Boulevard street frontage. The landscape percentage was not shown in the table summary on the site plan, but it appeared to be minimal after the additional planned dedications.

E9-7

To be clear, we do want to see the site developed as a thoughtful industrial park. Hopefully someone will take a step back and evaluate the total square footage and realistic office build out in this project as it is currently designed and figure out where these employees are supposed to park. If parking is not adequately provided for on-site, then employees will end up parking in the streets (narrowing room for trucks) and on neighboring properties without permission which is unacceptable. In addition the design of the truck loading will need to be examined to ensure that any truck stacking is onsite rather than in the street.

E9-8

Sincerely,

ALAMEDA 24th STREET, LLC

Craig Borstein

LETTER E10

From: Srimal Hewawitharana
To: Eric Charlton
Subject: Fwd: Case No. ENV-2012-920-EIR, AA-2012-919, DIR-2013-887-SPR (Submission # 1 re: DEIR)
Date: Monday, March 09, 2015 2:31:22 PM

---------- Forwarded message ----------
From: **Bruce Campbell** <madroneweb@aol.com>
Date: Mon, Mar 9, 2015 at 2:18 PM
Subject: Re: Case No. ENV-2012-920-EIR, AA-2012-919, DIR-2013-887-SPR (Submission # 1 re: DEIR)
To: srimal.hewawitharana@lacity.org

March 9th, 2015

Bruce Campbell

3520 Overland Ave. # A 149

Los Angeles, CA 90034

Dear Srimal Hewawitharana and to whom it may concern:

Please consider this my Submission # 1 regarding the DEIR on the 4051 South Alameda Street proposal.

Seeing that my important comment letter on the NOP (sent on July 9, 2014) was excluded from the comment letters in the Appendixes of the document – and thus my key concerns were often not addressed in the DEIR, I want this included in the comment letters on that document (the DEIR), so that the odds of these words evaporating into thin air once again are reduced. E10-1

Please look for near future Submissions of mine regarding the DEIR – which will all be numbered. Thank you.

Sincerely concerned,

Bruce Campbell

****

FW: Re: Case No. ENV-2012-920-EIR, AA-2012-919, DIR-2013-887-SPR/ Proposed Construction of Four Industrial Buildings

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From: Bruce Campbell [mailto:madroneweb@aol.com]
Sent: Monday, March 09, 2015 11:08 AM
To: 'srimal.hewawitharana@lacity.org'
Subject: FW: Re: Case No. ENV-2012-920-EIR, AA-2012-919, DIR-2013-887-SPR/ Proposed Construction of Four Industrial Buildings

Dear Srimal and to whom it may concern:

Since I did not find my comments when I scrolled through the comments on the Notice of Preparation, I am hereby sending my comments dated July 8, 2014 (which were e-mailed at 11:02 AM on July 9th, 2014) so that City personnel cannot claim that my comments never arrived. I also expect official documents to respond to my points raised 8 months ago – rather than to pretend such comments were never submitted! E10-2

Sincerely yours,

Bruce Campbell

From: Bruce Campbell [mailto:madroneweb@aol.com]
Sent: Wednesday, July 09, 2014 11:02 AM
To: 'srimal.hewawitharana@lacity.org'
Subject: Re: Case No. ENV-2012-920-EIR, AA-2012-919, DIR-2013-887-SPR/ Proposed Construction of Four Industrial Buildings

July 8, 2014

Bruce Campbell

3520 Overland Ave. # A 149

Los Angeles, CA 90034

Srimal Hewawitharana
Environmental Specialist II
Department of City Planning
200 N. Main St. 7th Floor
Los Angeles, CA 90012
Via email: srimal.hewawitharana@lacity.org

Re: Case No. ENV-2012-920-EIR, AA-2012-919, DIR-2013-887-SPR/ Proposed Construction of Four Industrial Buildings

Dear Ms. Hewawitharana, Planning Dept., and to whom it may concern:

These are my scoping comments on Re: Case No. ENV-2012-920-EIR, AA-2012-919, DIR-2013-887-SPR/ Proposed Construction of Four Industrial Buildings
-- also filed on behalf of the South Central Farmers Support Committee pertaining to the 4051 South Alameda Street Project.

I want to make a few initial crucial points:

1. I note (on a door on the 7th floor of L.A. City Hall) that the 41st and Alameda proposed project has been moved to the **"Major Projects"** part of the Planning Department. E10-3

2. I find it ironic that the project is apparently "major" enough to require an EIR, is "major" enough to be moved to that part of the Planning Dept., and yet it has been **declared that the proposed project is not of regional significance** and thus there are no plans for an in-person public meeting in which the public can comment on what the scope of the study should be. E10-4

3. Either in the EIR, or preferably as a prelude to scoping, **the public deserves to have the knowledge of exactly who was "the grand decision-maker" who apparently decided that this neighborhood wherein a major project** is proposed (involving polluting vehicles in a hard-to-access area in the already excessively-polluted Alameda Corridor region) **was not deserving of public scoping hearing.** (Please, either have someone admit to it, or we may pursue other methods to gather documents which expose the trail of who was involved. **Was the District # 9 Councilmember's office, someone with the Mayor's office, and/or the applicant or his people involved with convincing the "grand decision-maker" to make sure to avoid a public scoping hearing since there allegedly was no regional significance?**) E10-5

4. **I consider the "current project" documentation to be invalid.** Not only must there be **a public scoping meeting** to discuss the regional impacts of the proposed project, but when **there are continued blatant lies in regards to such things as how wide streets are** in the vicinity and **whether homes exist south of 41st Street and east of Long Beach Ave.**, why should be believe things like sampling for toxic materials and believing the number of theorized vehicle trips per day relating to the project(?) E10-6

****

I call for admission as to **who pressured whom, and who made the decision to avoid a public scoping hearing on the regional significance of the PIMA project.**

Then, **have two humans bring a tape measure and measure the streets that surround the 41st and Alameda site. Record correct info, and replace bogus numbers in documents such as under "Environmental Setting" on page 7 of 581 with the correct numbers.** (I am no lawyer, but I believe that many courtrooms like relative truth rather than easily-disproved lies, so change the street measurements if you want to retain any credibility.) E10-7

I want to point out that another major problem with the **"Environmental Setting"** portion is that **it pretends that there are no residences south of 41st Street and east of Long Beach Ave.** Please cease having Planning Dept. officials swallow whatever developers and often their Council lackeys tell them! You can go to the area and look for homes (which you will find) -- you can even bring a tape measure to do two tasks at once!! E10-8

It is my understanding that, though comments on earlier variations of the project are in "the file", that those comments will not count toward scoping comments on the current project. Though I will try to get important points in the record again, **but why should an old case number and the applicant's earlier info still be valid, and yet the comments on such a case number apparently will not count unless re-submitted?** *(Please point to a legal regulation which says that applicants can keep documents in the record, while also saying that comments on such documents would not formally be considered in the record to challenge the newer project.)* E10-9

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I note that **"Environmental Settings"** has changed from the earlier document. Taking my advice, Alameda Street was declared to be east rather than south of the site -- plus 41st Place was changed to 41st Street as I had pointed out. **WHAT ABOUT BOGUS ESTIMATES / MEASUREMENTS OF THE ADJACENT STREETS to the 41st and Alameda site?? Those remain not only very suspect, but BLATANTLY INACCURATE!** E10-10

A few of us mentioned large trucks in earlier comments. **The EIR must be very clear as to exactly what kind of trucks will be able to access which streets and which driveways in the area of the 41st and Alameda St. site. Will the trucks with 53 foot trailers and large sleeper cabs be able to access the area -- by which streets and to which driveways?** If not, explicitly mention in the EIR that no trucks with 53 foot trailers and sleeper cabs will be forbidden to enter the area. Even some other trucks will have a hard time with Long Beach Ave. and other streets and driveways in the area. E10-11

Please examine Sarah Nolan's concerns about lined up traffic waiting to turn in their scrap metal (when considering how accessible certain roads would be when giant trucks are seeking to travel on narrow roads), as well as the Food Bank's concern that there still be parking on both sides of 41st Street. E10-12

It is also odd that the documentation omits the **inescapable fact that the Metrorail Blue Line runs on some tracks adjacent to the Pacific Railroad's tracks and crosses the fairly busy 41st Street.** So, the fantasyland of this development proposal envisions wide roads, disappearing residences, and a seemingly vanished light-rail line. That is simply not the reality of this site. (I hope to have included in the record some of **Metro's earlier concerns about the proposed project's impact on safety in the 41st Street and Long Beach Avenue area.**) E10-13

The latest "Environmental Setting" says that the site is level. While it is fairly level, yet a map in the record notes that it is a few feet higher at northeastern end than it is at the southwestern end of the property. E10-14

Also, I realize that not only was there a concerted effort made to pretend that there are no residences south of 41st St. and east of Long Beach Ave., but **they even have the nerve to pretend that the fairly densely populated neighborhood to the west of Long Beach Ave. is mere warehouse / industrial.** Basically, after going about a block west of Long Beach Ave. on 41st Ave., then it is predominately a residential area, and quite a populated one at that. **Thus, do not pretend there are not a bunch of "sensitive receptors" in the immediate as well as greater vicinity of the 41st and Alameda site.** E10-15

I will now peer at the map in the record and mention some key parcels in the general area which could be considered "sensitive receptors" or otherwise contributing to safety concerns in the region. **Glancing at page 27 of 781, the Snyder Recreation Center would be the closest site which would have a number of sensitive receptor people (unless one counts individuals with asthma, other ailments, or a baby or elder in closerby residences) I note that the nearest school is Nevin Ave. School -- followed closely by Jefferson High School, then the Roberts Recreation Center, the Ascot Avenue School, and the Holmes Ave. School. Carefully evaluate the likely impacts of added air pollutants on the sensitive receptors at each school and recreation site mentioned above.** E10-16

Increased diesel emissions, increased congestion, inadequate street size, and other aspects relating to the project will certainly add to the already excessive toxic burden which the Alameda - Central community carries at the aforementioned schools and recreation centers, as well as otherwise. While I personally have not surveyed the neighborhood for nursing / retirement homes, or for places for medical or psychiatric care, please identify such facilities in the EIR if they are within 3/4 of a mile of the 41st and Alameda site. E10-17

With the increased congestion on all 4 surrounding streets, as well as the proposed surge in vehicle journeys associated with the project, **this increase in emissions which clearly has an impact on many sensitive receptors must be carefully analyzed in the EIR.** In addition, **these emissions, plus the impact on health and safety of sensitive receptors** in the neighborhood, must also be carefully analyzed in **an Environmental Justice context.** E10-18

****

IMPORTANT SUBSTANCES FOR WHICH TO TEST:

I find 14 samples at 5 foot depth, with perhaps two at a 15-foot depth as part of a soil vapor probe, to be an inadequate characterization of this heavily abused site for toxic materials. E10-19

I call for a thorough assessment of hazards and hazardous materials to be included in the EIR. **Such thorough testing would involve numerous sampling sites within each acre within the 41st and Alameda site.** A mere one sample per acre is certainly inadequate if one is concerned about health and safety. I am not an expert on sampling, but the more the better, and taking samples at differing depths could bring useful information forward. E10-20

The toxic materials which must be tested for (in the EIR) include: Total Petroleum Hydrocarbons (TPH), VOCs, SVOCs, CCR Title 22 metals, organochlorine pesticides, PCBs, pentachlorophenol, creosote, formaldehyde, xylene, benzene, toluene, 2,4-D , DDT / DDE, glyphosate, atrazine, ARSENIC, lead, fluoride, HEXAVALENT CHROMIUM, cadmium, chromium, chromium-6, chromium-12, perchlorate, TCE, Tetrachloroethene, PCE, diesel constituents and breakdown products, as well as for substances one might find from a color and dye company and from a dry-cleaning company once on the site. E10-21

In addition, test for these components and/or breakdown products of diesel. I note that **Table 1: Substances in Diesel Exhaust Listed by Cal EPA as Toxic Air Contaminants mentions these:** acetaldehyde; acrolein; aniline; antimony compounds; arsenic; benzene; beryllium compounds; biphenyl; bis[2-ehtylhexyl)phthalate; 1,3-butadiene; cadmium; chlorine; chlorobenzene; chromium compounds; cobalt compounds; creosol isomers; cyanide compounds; dibutylphthalate; dioxins and dibenzofurans; ethyl benzene; formaldehyde; inorganic lead; manganese compounds; mercury compounds; methanol; mehtyl ethyl ketone; naphthalene; nickel; 4-nitrobiphenyl; phenol; phosphorus; polycyclic organic matter, including polycyclic aromatic hydrocarbons (PAHs) and their derivatives; propionaldehyde; selenium compounds; styrene; toluene; xylene isomers and mixtures; o-sylenes; m-xylenes; and p-xylenes. Please test for some of these components of diesel emissions in soil at various sites throughout the approximately 14 acres. E10-22

Some review of the earlier documentation indicated that certain substances were found at levels of concern. E10-23

Seeing that an AQMD official or staffer advised that the earlier incarnation of this proposed development be mitigated by having a ramp for traffic to travel all the way from the 41st and Alameda site up to the Santa Monica Freeway, does it sound like the AQMD considers this fairly similar development (except on even more of the site) of regional significance? E10-24

****

Let me quote three paragraphs which are the third to fifth paragraphs under "Background" which is beneath "1. Introduction". The third paragraph reads: "At least five phases of environmental soil investigation has been conducted on the Property with testing for total petroleum hydrocarbons TPH), volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), metals, hexavalent chromium, organochlorine pesticides, polychlorinated biphenyls (PCBs) and herbicides. No significant concentrations were detected for most of these chemicals of potential concern. E10-25

However, elevated concentrations of certain metals were detected in a limited number of samples, but in no discernable pattern. A limited risk assessment addressed the 'elevated' arsenic concentrations and concluded that the risk from arsenic did not require remediation or mitigation *measures beyond what would normally be appropriate for construction sites.* **It has been further concluded that additional characterization of the soil for metals may be warranted if the Property were to be used for residential purposes, or soils were to be removed from the Property.**

In addition, low concentrations of VOCs were identified in scattered soil samples in earlier investigations. No soil vapor assessment has been conducted on the Property to date. Consequently, it is not clear whether these VOC detections resulted from small release incidents or are indicative of a wider, more significant problem. **A comprehensive Property-wide soil vapor assessment was recommended."** E10-26

Let us re-examine the earlier sentence (3 paragraphs up) that says: "No significant concentrations were detected for most of these chemicals of potential concern." This is an unusual way of saying the site is doing alright in regards to its contamination by "most" chemicals, but **it does not state clearly which precise substances were tested that were found beyond regulatory levels.** E10-27

Are all the substances that exceeded regulatory levels mentioned in the first paragraph (immediately below the line of asterisks) or in the following paragraph (arsenic and perhaps other metals)? **Please clearly state which toxic materials were found at the site which exceeded the "usual" regulatory level. Please also make another distinction -- that would be how many (and identify) the toxic materials that would need remediation if the site was to host residences (or if soil was to be removed from the site).** There are repeated references (especially by SCS Engineers reports) that a number of toxic materials are too high if the area was to be residential, but **apparently a fairly high toxic material level is acceptable if a site is merely a "construction" or "industrial" site.** Is part of this logic that people may well spend over half their 24-hour day at their residence, but spend closer to 8 or 9 hours at their workplace? However, sweat-shops are known for long hours. Should hours of a worker at the 41st and Alameda site be limited so that they do not receive excessive exposure from toxic materials lurking in the soil? Please explain. **Also explain how much soil would need to be "removed" from the site in order to trigger a more thorough investigation and remediation of such toxic substances. Are there plans for the removal of any soil from the 41st and Alameda site? Explain…** E10-28

I will now quote the "5 REGULATORY LIMITS" portion of the March 2011 soil vapor study by SCS Engineers: "The California EPA Office of Environmental Health Hazard Assessment (OEHHA) published the *Human-Exposure-Based Screening Numbers Developed to Aid Estimation of Cleanup Costs for Contaminated Soil*, dated November 2004, revised January 2005. Within this document, California Human Health Screening Levels, or CHHSLs, were developed for certain VOCs in soil gas at 5 feet below buildings for vapor intrusion into structures under residential and industrial / commercial land use scenarios. The CHHSLs are based on general assumptions regarding soils and buildings at VOC-impacted sites, the chemical characteristics of various VOCs, and potential health risks. **The OEHHA guidance states that CHHSLs are 'useful to get a general understanding of potential problems with a site, but cannot be used to assess actual health risks.' Further, OEHHA has stated that CHHSLs have 'no regulatory effect, and have been published solely as a reference value** that may be used by citizen groups, community organizations, property owners, developers, and local government officials to estimate the degree of effort that may be necessary to remediate a property.' E10-29

The VOCs detected in vapor samples collected from the Property may be compared to the CHHSLs (if any) listed at the bottom of Table 1. Of the samples collected at 5 feet bgs, two contained PCE (SV2-5' and SV6-5') above its commercial/industrial CHHSL of 0.603 ug/L. The remaining concentrations of PCE and other VOCs were below theoir respective commercial/industrial CHHSLs, if any."

E10-30

First, explain PCE once more. One of the documents calls Tetrachloroethene "PCE", even though it seems like PCE would have penta or a per (rather than tetra) beginning the chemical name. But then I notice in the June 2013 SCS document that says PCE is actually "perchloroethene." Please alleviate any confusion regarding this alphabet soup matter.

E10-31

It sounds like the CHHSLs is a basic reference which cannot be relied upon to properly assess health risks (whether it be for residential, construction, or industrial / commercial property). Would not the "precautionary principle" dictate that there needs to be a "real" health assessment with a firmer testing and remediation regimen, rather than some toothless general references? Are sweatshop workers, truckers, and construction workers expendable, or can they handle a higher toxic load? Explain thoroughly in the EIR.

E10-32

It is vital to point out (as it was in the last paragraph under "6 SUMMARY AND FINDINGS") that **"there has been no regulatory involvement or oversight of the investigations to date."** Later in that paragraph from a SCS report, it says that "There is a **possibility that regulatory agencies**, upon review of this report, **would require further investigation to confirm findings of this investigation and the vertical extent of VOCs in the soil.** In addition, if the Property is to be developed for residential use, additional investigation or a health risk assessment may be warranted."

E10-33

If a formal "health risk assessment" was undertaken, would that follow certain guidelines set forth by certain agencies? It also appears that one of the further investigations (and related sampling) needed pertain to the need for sampling at varying depths in order to gauge the vertical extent of VOCs in the soil.

E10-34

I want to point out some "Data Gaps" which were admitted on pages v and vi of the SCS Engineers' June 2013 Phase I Environmental Assessment. Gaps are admitted in "individual parcel histories", and it is admitted that: **"In light of the industrial usage of much of the Property, this is a potentially significant data gap."** It is furthermore pointed out that much of the industrial activity on this site existed when there was little or no regulatory oversight of toxic materials. "Consequently, **there are no records of hazardous material use or management. This is a potentially significant data gap."**

E10-35

Since there are admitted data gaps and uncertainties regarding extent of contamination, let us choose the side of caution and do thorough sampling for the substances which I have already mentioned in this scoping comment. The **Alameda / Central neighborhood is already essentially a "sacrifice area".** -- note that there is no admission in the record that there are actual residents in the neighborhood (either the quite immediate area to the south of 41st St. and east of Long Beach Ave.), but even no admission that residents exist in the quite populated area west of Long Beach Ave.

E10-36

As an indication **that the Alameda / Central neighborhood is essentially a "sacrifice area"**, I note that there are **11 hazardous waste sites** (called US EPAHazardous Waste Generators) **within a quarter mile of the 41st and Alameda site** (see page 18 of SCS June 2013 report). This shows that the neighborhood is already overburdened with toxic materials and industry **-- this must be part of a thorough Environmental Justice analysis on the proposed project.**

E10-37

The CUMULATIVE IMPACT of all the historic hazardous materials activities on the 41st and Alameda site, continued exposure to such materials on-site, combined with excessive air pollutants from industry in the region (including the nearby hazardous waste generators as well as the Exide battery facility in Vernon), combined with pollutants from nearby freeways and streets as well as from LAX-related air traffic (including the associated "fine particulates") combined with likely emissions from the project (in construction and operational phases) all need to be carefully evaluated.

E10-38

By the way, **what model will be used to predict emissions from construction activities on the 41st and Alameda site? How will NOX and "black carbon" be regulated as far as construction emissions at the site?** Also, **identify the VOC content of paint** which may be used at this site. In regards to traffic, **we need more detail on what trip generation assumptions are used to generate operational emissions from the project. As far as facility operation, will there be**

E10-39

regulations pertaining to idling time for diesel trucks, or will cleaner trucks be considered since this area is already overburdened with toxic materials?

E10-39, Cntd

Apparently, mere sweatshop workers, groundskeepers, and truck-drivers do not deserve a level of remediation of the site that one would expect (and which may be legally mandated) if a residence or residences were planned on the property.

Lastly, I will mention that more things should have been checked on the checklist as applicable to this project -- though I mentioned it in earlier comments which will be scanned and sent in, so I will leave it be for now.

E10-40

Keep me updated on any public scoping hearing, and in regards to all other aspects of the proposed development on the 41st and Alameda site -- now increasingly called the 4051 South Alameda Street Project.

E10-41

Thank you for your consideration of this input and guidance.

Sincerely yours,

Bruce Campbell

From: Srimal Hewawitharana
To: Eric Charlton
Subject: Fwd: CASE NO.: ENV-2012-920-EIR, AA-2012-919-PMLA, DIR-2013-887-SPR (Submission # 3 on DEIR)
Date: Monday, March 09, 2015 3:19:18 PM

---------- Forwarded message ----------
From: **Bruce Campbell** <madroneweb@aol.com>
Date: Mon, Mar 9, 2015 at 2:49 PM
Subject: Re: CASE NO.: ENV-2012-920-EIR, AA-2012-919-PMLA, DIR-2013-887-SPR (Submission # 3 on DEIR)
To: srimal.hewawitharana@lacity.org

March 9, 2015

Bruce Campbell

3520 Overland

Ave. # A 149

Los Angeles, CA

90034

Dear Ms. Hewawitharana and to whom it may concern:

This is my third submission of comments regarding the DEIR on the 4051 South Alameda Street proposal.

Thank you for including them in the file.

E11-1

The following were key paragraphs in my comment letter (sent on July 9, 2014) on the NOP – which I wanted to especially highlight due there being a desperate need for responses to the issues.

These include a whole bunch of toxic materials which should be tested for at the old South Central Farm site, as well as in regards to needing an Environmental Justice analysis seeing that the Alameda / Central neighborhood is often considered a "sacrifice zone." Plus, we need analyses of "black carbon", more discussion on what trucks are allowed and their turning radius, etc.

E11-2

Also, it is sure bogus to act like measurements four miles to the north accounts for what is in Alameda Corridor area air, and yet cut off consideration of "SENSITIVE RECEPTORS" at a mere 500 feet from the 4051 South Alameda site – so I will re-copy what I advised as far as analyzing how sensitive receptors at recreation, school, and other sites not far away from the site will be impacted. E11-3

The DEIR inadequately analyzes "sensitive receptors" and virtually ignores the key analyses needed in regards to ENVIRONMENTAL JUSTICE / SACRIFICE ZONES, BLACK CARBON EMISSIONS, CUMULATIVE IMPACTS to Sensitive Receptors, to workers, and to others in the neighborhood or along the Alameda Corridor. Here are some excerpts from my comment letter submission sent on July 9, 2014: E11-4

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Also, I realize that not only was there a concerted effort made to pretend that there are no residences south of 41st St. and east of Long Beach Ave., but **they even have the nerve to pretend that the fairly densely populated neighborhood to the west of Long Beach Ave. is mere warehouse / industrial.** Basically, after going about a block west of Long Beach Ave. on 41st Ave., then it is predominately a residential area, and quite a populated one at that. **Thus, do not pretend there are not a bunch of "sensitive receptors" in the immediate as well as greater vicinity of the 41st and Alameda site.**

I will now peer at the map in the record and mention some key parcels in the general area which could be considered "sensitive receptors" or otherwise contributing to safety concerns in the region. **Glancing at page 27 of 781, the Snyder Recreation Center would be the closest site which would have a number of sensitive receptor people (unless one counts individuals with asthma, other ailments, or a baby or elder in closerby residences) I note that the nearest school is Nevin Ave. School -- followed closely by Jefferson High School, then the Roberts Recreation Center, the Ascot Avenue School, and the Holmes Ave. School. Carefully evaluate the likely impacts of added air pollutants on the sensitive receptors at each school and recreation site mentioned above.**

Increased diesel emissions, increased congestion, inadequate street size, and other aspects relating to the project will certainly add to the already excessive toxic burden which the Alameda - Central community carries at the aforementioned schools and recreation centers, as well as otherwise. While I personally have not surveyed the neighborhood for nursing / retirement homes, or for places for medical or psychiatric care, please identify such facilities in the EIR if they are within 3/4 of a mile of the 41st and Alameda site.

With the increased congestion on all 4 surrounding streets, as well as the proposed surge in vehicle journeys associated with the project, **this increase in emissions which clearly has an**

impact on many sensitive receptors must be carefully analyzed in the EIR. In addition, **these emissions, plus the impact on health and safety of sensitive receptors** in the neighborhood, must also be carefully analyzed in **an Environmental Justice context.**

E11-4, Cntd

****

IMPORTANT SUBSTANCES FOR WHICH TO TEST:

I find 14 samples at 5 foot depth, with perhaps two at a 15-foot depth as part of a soil vapor probe, to be an inadequate characterization of this heavily abused site for toxic materials.

I call for a thorough assessment of hazards and hazardous materials to be included in the EIR. **Such thorough testing would involve numerous sampling sites within each acre within the 41st and Alameda site.** A mere one sample per acre is certainly inadequate if one is concerned about health and safety. I am not an expert on sampling, but the more the better, and taking samples at differing depths could bring useful information forward.

The toxic materials which must be tested for (in the EIR) include: Total Petroleum Hydrocarbons (TPH), VOCs, SVOCs, CCR Title 22 metals, organochlorine pesticides, PCBs, pentachlorophenol, creosote, formaldehyde, xylene, benzene, toluene, 2,4-D , DDT / DDE, glyphosate, atrazine, ARSENIC, lead, fluoride, HEXAVALENT CHROMIUM, cadmium, chromium, chromium-6, chromium-12, perchlorate, TCE, Tetrachloroethene, PCE, diesel constituents and breakdown products, as well as for substances one might find from a color and dye company and from a dry-cleaning company once on the site.

E11-5

In addition, test for these components and/or breakdown products of diesel. I note that **Table 1: Substances in Diesel Exhaust Listed by Cal EPA as Toxic Air Contaminants mentions these:** acetaldehyde; acrolein; aniline; antimony compounds; arsenic; benzene; beryllium compounds; biphenyl; bis[2-ehtylhexyl)phthalate; 1,3-butadiene; cadmium; chlorine; chlorobenzene; chromium compounds; cobalt compounds; creosol isomers; cyanide compounds; dibutylphthalate; dioxins and dibenzofurans; ethyl benzene; formaldehyde; inorganic lead; manganese compounds; mercury compounds; methanol; mehtyl ethyl ketone; naphthalene; nickel; 4-nitrobiphenyl; phenol; phosphorus; polycyclic organic matter, including polycyclic aromatic hydrocarbons (PAHs) and their derivatives; propionaldehyde; selenium compounds; styrene; toluene; xylene isomers and mixtures; o-sylenes; m-xylenes; and p-xylenes. Please test for some of these components of diesel emissions in soil at various sites throughout the approximately 14 acres.

Some review of the earlier documentation indicated that certain substances were found at levels of concern.

Seeing that an AQMD official or staffer advised that the earlier incarnation of this proposed development be mitigated by having a ramp for traffic to travel all the way from the 41st and Alameda site up to the Santa Monica Freeway, does it sound like the AQMD considers this fairly similar development (except on even more of the site) of regional significance? E11-6

****

It is vital to point out (as it was in the last paragraph under "6 SUMMARY AND FINDINGS") that **"there has been no regulatory involvement or oversight of the investigations to date."** Later in that paragraph from a SCS report, it says that "There is a **possibility that regulatory agencies**, upon review of this report, **would require further investigation to confirm findings of this investigation and the vertical extent of VOCs in the soil.** In addition, if the Property is to be developed for residential use, additional investigation or a health risk assessment may be warranted." E11-7

If a formal "health risk assessment" was undertaken, would that follow certain guidelines set forth by certain agencies? It also appears that one of the further investigations (and related sampling) needed pertain to the need for sampling at varying depths in order to gauge the vertical extent of VOCs in the soil.

I want to point out some "Data Gaps" which were admitted on pages v and vi of the SCS Engineers' June 2013 Phase I Environmental Assessment. Gaps are admitted in "individual parcel histories", and it is admitted that: **"In light of the industrial usage of much of the Property, this is a potentially significant data gap."** It is furthermore pointed out that much of the industrial activity on this site existed when there was little or no regulatory oversight of toxic materials. "Consequently, **there are no records of hazardous material use or management. This is a potentially significant data gap."** E11-8

Since there are admitted data gaps and uncertainties regarding extent of contamination, let us choose the side of caution and do thorough sampling for the substances which I have already mentioned in this scoping comment. The **Alameda / Central neighborhood is already essentially a "sacrifice area".** -- note that there is no admission in the record that there are actual residents in the neighborhood (either the quite immediate area to the south of 41st St. and east of Long Beach Ave.), but even no admission that residents exist in the quite populated area west of Long Beach Ave.

As an indication **that the Alameda / Central neighborhood is essentially a "sacrifice area"**, I note that there are **11 hazardous waste sites** (called US EPAHazardous Waste Generators) **within a quarter mile of the 41st and Alameda site** (see page 18 of SCS June 2013 report). This shows that the neighborhood is already overburdened with toxic materials and industry -- **this must be part of a thorough Environmental Justice analysis on the proposed project.** E11-9

The CUMULATIVE IMPACT of all the historic hazardous materials activities on the 41st and Alameda site, continued exposure to such materials on-site, combined with excessive air pollutants from industry in the region (including the nearby hazardous waste generators as well as the Exide battery facility in Vernon), combined with pollutants from nearby freeways and streets as well as from LAX-related air traffic (including the associated "fine particulates") combined with likely emissions from the project (in construction and operational phases) all need to be carefully evaluated.

E11-10

By the way, **what model will be used to predict emissions from construction activities on the 41st and Alameda site? How will NOX and "black carbon" be regulated as far as construction emissions at the site?** Also, **identify the VOC content of paint** which may be used at this site. In regards to traffic, **we need more detail on what trip generation assumptions are used to generate operational emissions from the project. As far as facility operation, will there be regulations pertaining to idling time for diesel trucks, or will cleaner trucks be considered since this area is already overburdened with toxic materials?**

E11-11

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The above excerpts does not mean that you can ignore other points that I brought up in my comment letter on the NOP sent on July 9, 2014 just because they are not specifically re-copied in this Submission # 3 on the DEIR on the 4051 So. Alameda St. project.

E11-12

Sincerely,

Bruce Campbell

LETTER E12

From: Srimal Hewawitharana
To: Eric Charlton
Subject: Fwd: Comment Letter on CASE NO.: ENV-2012-920-EIR, AA-2012-919-PMLA, DIR-2013-887-SPR (Submission # 2 on DEIR)
Date: Monday, March 09, 2015 2:44:28 PM

---------- Forwarded message ----------
From: **Bruce Campbell** <madroneweb@aol.com>
Date: Mon, Mar 9, 2015 at 2:39 PM
Subject: Comment Letter on CASE NO.: ENV-2012-920-EIR, AA-2012-919-PMLA, DIR-2013-887-SPR (Submission # 2 on DEIR)
To: srimal.hewawitharana@lacity.org

March 9, 2015

Bruce Campbell
3520 Overland Ave. # A 149
Los Angeles, CA 90034

Dear Ms. Hewawitharana and to whom it may concern:

This is my second submission of comments regarding the DEIR on the 4051 South Alameda Street proposal.

Thank you for including them in the file.

E12-1

Sincerely,

Bruce Campbell

****

FW: Please Re-Submit DEIR Due to Exclusion of My (and perhaps other) Comment on the Notice of Preparation for 4051 South Alameda Street

---

From: Bruce Campbell [mailto:madroneweb@aol.com]
Sent: Monday, March 09, 2015 12:50 PM
To: 'srimal.hewawitharana@lacity.org'
Cc: 'paul.koretz@lacity.org'
Subject: Please Re-Submit DEIR Due to Exclusion of My (and perhaps other) Comment on the Notice of Preparation for 4051 South Alameda Street

March 9, 2015

Bruce Campbell
3520 Overland Ave. # A 149
Los Angeles, CA 90034

Re: Need to Recirculate DEIR regarding CASE NO.: ENV-2012-920-EIR, AA-2012-919-PMLA, DIR-2013-887-SPR

Dear Srimal Hewawitharana and L.A. City Planning Department,

Due to the exclusion of my comment letter from the Appendixes of the DEIR regarding the 4051 South Alameda Street project, please begin the process to re-submit the DEIR with at least a 45-day comment period. In this circulation, do include my comment letter on the Notice of Preparation which was sent to Ms. Hewawitharana on July 9th, 2014 – as well as all other comment letters on the project whether they were accidentally or purposefully excluded. (I forwarded my original comment letter to Ms. Hewawitharana earlier today to prove that such a comment letter exists and was sent in a timely manner.) It would also be preferable if the letters submitted by the public and by agencies could be viewed taking up more of the screen.

E12-2

It may be a metaphor for the land-use process in the City of L.A., but why should the applicant's pages of info cover the whole computer screen, while I have to squint with my computer glasses on in order to see what the public said in comments covering a small portion of the screen? Of course, it is easier to hide the fact that certain comments were excluded if the scrolling process is a laborious process and has real small print. But, I ask for my comment letter dated July 8th, 2014, and sent via e-mail on July 9th, 2014, to be included in a recirculated DEIR – preferably in a large enough size to read.

Thank you for remedying this serious violation of CEQA and begin the recirculation process soon.

LETTER E12

Sincerely concerned,

Bruce Campbell

^^^

From: Srimal Hewawitharana
To: Eric Charlton
Subject: Fwd: FW: CASE NO.: ENV-2012-920-EIR, AA-2012-919-PMLA, DIR-2013-887-SPR (Submission # 4 on DEIR)
Date: Monday, March 09, 2015 4:22:10 PM

---------- Forwarded message ----------
From: **Bruce Campbell** <madroneweb@aol.com>
Date: Mon, Mar 9, 2015 at 4:18 PM
Subject: FW: CASE NO.: ENV-2012-920-EIR, AA-2012-919-PMLA, DIR-2013-887-SPR (Submission # 4 on DEIR)
To: srimal.hewawitharana@lacity.org

Hi Srimal,

I accidentally sent my Submission # 4 to myself – rather than to you.

I sure hope that this is counted despite my accident of sending it to myself instead (while honing the wording).

And whether this is counted or not, my other 3 Submissions do count, and thus the DEIR must be recirculated answering many of my concerns brought up in my July 9, 2014 and other comments. E13-1

Sincerely,

Bruce Campbell

From: Bruce Campbell [mailto:madroneweb@aol.com]
Sent: Monday, March 09, 2015 3:59 PM
To: 'Bruce Campbell'
Subject: Re: CASE NO.: ENV-2012-920-EIR, AA-2012-919-PMLA, DIR-2013-887-SPR

March 9th, 2015

Bruce
Campbell
3520
Overland Ave. # A 149
Los
Angeles, CA 90034

Dear Srimal Hewawitharana and to whom it may concern:

Please consider this my Submission # 4 regarding the DEIR on the 4051 South Alameda Street proposal. I could sure use more time to assemble my notes since I did not expect to spend a few hours today reiterating my earlier (scandalously excluded) submission on the NOP with that e-mail sent on July 9, 2014. But, that is how the ball bounced seeing that my substantial comments were conveniently excluded from the Appendix which had at least most of the comment letters on the Notice of Preparation for the 4051 So. Alameda St. project. E13-2

I note that Sensitive Receptors seem to be more or less mapped within 500 feet of the proposed project site. Why only 500 feet? Aren't the higher concentration of sensitive receptors just beyond that 500 foot distance? Please respond to my concern about sensitive receptors at various schools, recreation centers, etc. (as was called for in my 7-9-14 e-mailed comment letter on the NOP). E13-3

Then I notice that 11 other construction projects in the general vicinity are examined. However, there are two key actual or potential construction projects that should also be evaluated in relation to an analysis of traffic congestion and air emissions in the 4051 So. Alameda Street project. Those two are the huge Wilshire and Figueroa construction project, as well as the possibility of building an NFL stadium at the site of the West Hall of the L.A. Convention Center. How many construction-related vehicles for those projects use Alameda Street / Corridor, and would be slowed by the congestion around the 4051 So. Alameda site due to construction and operation of the proposed sweatshops? E13-4

Now I will get into why a monitoring station for air contaminants on North Main Street (north/northeast of Chinatown) fails miserably to account for what is in the air of the Alameda Corridor. The Alameda Corridor has especially toxic air contaminants being emitted due to it being such a key goods movement area. Also, the emissions related to LA International Airport flights waft up to the 4051 So. Alameda site. Plus, look at the immediate area of the proposed project site. There is Alameda Street and the Corridor virtually right there, and the Harbor Freeway is to the west and the Long Beach Freeway to the east. E13-5

If one compares that with the air monitoring station on North Main Street, in that general vicinity are the narrow "Cornfields" park and the larger fairly nearby Elysian Park (which could help filter some air contaminants to make the air toxics readings less). Plus though the Harbor Freeway is in the general area, yet trucks are not allowed north of downtown L.A. on the 110, so one would not expect major diesel emissions from that thoroughfare at that point. Interstate 5 is in the vicinity to the east, and it does have some diesel and goods movement – but is not immersed in a region where diesel-spewing vehicles transporting goods (such is the case with the 4051 So. Alameda site). E13-5, Cntd

Do not forget that CEQA Guidelines, Section 15130, says that an EIR is required to "consider the significant environmental impacts of a project as well as 'cumulative impacts'." I await a more thorough cumulative impacts analysis in regards to toxic air contaminants, in regards to impacts of such on sensitive receptors, and in regards to health and safety impact of construction and operation on a very toxic site (4051 So. Alameda). E13-6

Recall that CEQA Section 15355 defines cumulative impact as "an impact that is created as a result of the combination of the project evaluated in the EIR together with other projects causing related impacts." Clearly, construction emissions and hauling workers and equipment to construction sites (such as 4051 So. Alameda – as well as for the proposed NFL stadium at the Conv Ctr site as well as the giant construction project now taking place at Wilshire and Figueroa.

CEQA Section 15130 (a)[1} does not so much apply here – since the vehicles destined for the different sites do overlap and emit toxic air emissions – so it is in part due to 4051 So. Alameda proposed project with the emitting vehicles that they attract.

We need a CEQA cumulative impacts analysis on impact to worker health and safety from construction and operational activities on the site.

Environmental Justice is clearly an Area of Controversy – will it be analyzed for in a recirculated DEIR? E13-7

Remember construction equipment emissions are considerably cumulative. E13-8

Sincerely yours,

Bruce Campbell

LETTER E14

From: Srimal Hewawitharana
To: Eric Charlton
Subject: Fwd: Need for Recirculation of DEIR re: 4051 South Alameda Street
Date: Monday, March 09, 2015 1:40:17 PM

---------- Forwarded message ----------
From: **Bruce Campbell** <madroneweb@aol.com>
Date: Mon, Mar 9, 2015 at 1:13 PM
Subject: Re: Need for Recirculation of DEIR re: 4051 South Alameda Street
To: srimal.hewawitharana@lacity.org
Cc: paul.koretz@lacity.org

Dear Ms. Hewawitharana:

Of course I am seeking additional responses in the new DEIR to respond to many concerns which I brought up, not just calling for the addition of excluded letter(s), but with the exact same wording by the applicant to be re-circulated. E14-1

Some of my points (but not all) where I saw no discussion of the subject in the documents include considering the Alameda / Central neighborhood in an "Environmental Justice" analysis – and I referred to the vicinity as a "sacrifice zone". I also asked for analysis of "black carbon" toxic emissions to be analyzed both in terms of toxicity of air pollutants relating to the project's construction phase emissions (and preferably relating to Greenhouse Gases as well) – but I was unable to locate any discussion of that significant toxin in the DEIR and associated documents. E14-2

I called for the document to state exactly what kind of trucks would be allowed into the 4051 South Alameda site (including specifically asking about 53-foot trailers with large sleeper cabs which are so difficult to maneuver on many urban streets), while another person who focused on truck-related comments was also unable to find his comment on the NOP. E14-3

And there is more, but I am trying to work on new comments at this time rather than do house-cleaning regarding the bureaucratic snafu which excluded my (and perhaps other) comment letters on the NOP. E14-4

Sincerely,

Bruce Campbell

From:	Srimal Hewawitharana
To:	Eric Charlton
Subject:	Fwd: Please Re-Submit DEIR Due to Exclusion of My (and perhaps other) Comment on the Notice of Preparation for 4051 South Alameda Street
Date:	Monday, March 09, 2015 1:00:30 PM

---------- Forwarded message ----------
From: **Bruce Campbell** <madroneweb@aol.com>
Date: Mon, Mar 9, 2015 at 12:49 PM
Subject: Please Re-Submit DEIR Due to Exclusion of My (and perhaps other) Comment on the Notice of Preparation for 4051 South Alameda Street
To: srimal.hewawitharana@lacity.org
Cc: paul.koretz@lacity.org

March 9, 2015

Bruce Campbell

3520 Overland Ave. # A 149

Los Angeles, CA 90034

Re: Need to Recirculate DEIR regarding CASE NO.: ENV-2012-920-EIR, AA-2012-919-PMLA, DIR-2013-887-SPR

Dear Srimal Hewawitharana and L.A. City Planning Department,

Due to the exclusion of my comment letter from the Appendixes of the DEIR regarding the 4051 South Alameda Street project, please begin the process to re-submit the DEIR with at least a 45-day comment period. In this circulation, do include my comment letter on the Notice of Preparation which was sent to Ms. Hewawitharana on July 9th, 2014 – as well as all other comment letters on the project whether they were accidentally or purposefully excluded. (I forwarded my original comment letter to Ms. Hewawitharana earlier today to prove that such a comment letter exists and was sent in a timely manner.) It would also be preferable if the letters submitted by the public and by agencies could be viewed taking up more of the screen. E15-1

It may be a metaphor for the land-use process in the City of L.A., but why should the applicant's pages of info cover the whole computer screen, while I have to squint with my computer glasses on in order to see what the public said in comments E15-2

covering a small portion of the screen? Of course, it is easier to hide the fact that certain comments were excluded if the scrolling process is a laborious process and has real small print. But, I ask for my comment letter dated July 8th, 2014, and sent via e-mail on July 9th, 2014, to be included in a recirculated DEIR – preferably in a large enough size to read.

E15-2, Cntd

Thank you for remedying this serious violation of CEQA and begin the recirculation process soon.

Sincerely concerned,

Bruce Campbell

Mi NOMBRE. Antonio T Cano

Tengo 5 Año trabajando con la Compania INPAC es un Verdadero agrado trabajando en esta Compania y un gusto que al Saber que nos dan mas trabajo quiciara que la Compania Cresca mas Para Seguir mas adelante - que Dios Vendiga El Patron

Antentamente Antonio T Cano

E16-1

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Hi mi name is Jesus Chagoya, I live on 8th St. of Los Angeles CA. I have been living in Los Angeles for about 13 years now. I have been working at Impact Inc. since December 2013. I started working in the bundling area, and then I was moved as a production assistant. Ever since I started working here it has helped in economically because of the over time our boss offer us. I am really happy working at impact, everybody is nice to each other here we get along good. Some days during the week the boss lets us stay after work since we have sports activities such as soccer & basketball. Working at Impact has helped me afford a better living for me and family since my mom depends on me. Impact has been great for me because I have met people in here that I consider as second family we celebrate our birthdays together and we share some great moments.

E17-1

Thank you.

LETTER E18

Me Llamo Carmelo Cruz

Tengo mas de 25 años de trabajar en impact Conosco muy bien mi patron. él es una persona muy amable. Con nosotros nos aprecia por estar trabajando con él ya que nunca hemos tenido problemas con él siempre nos tiene trabajo nos da tiempo extra yo me encargo de abrir la factoria hago limpieza acomodo todo lo relacionado del trabajo. Siempre soy puntual a la hora de entrar a trabajar. no tengo problema con mis compañeros de trabajo me gusta llevarme bien con ellos y asi Trabajamos mejor

Y si requiere mas informacion me puede hablar en mi Cellphone 323 493 0274

Yo siempre e vivido en el area 90011 en Los Angeles CA. 90011

Gracias 03/09/2015

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E18-1

LETTER E19

yo me llamo Diego Juan.

Trabajo en INFAC.

empece a Trabajar en 2009.

es un patron Exelente.

gracias a el Tengo mucho Trabajo

atentamente:

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E19-1

From: Srimal Hewawitharana
To: Eric Charlton
Subject: Fwd: 4051 Alameda Project
Date: Friday, March 06, 2015 2:30:20 PM

---------- Forwarded message ----------
From: **Lety** <lety@impact4989.com>
Date: Fri, Mar 6, 2015 at 1:08 PM
Subject: 4051 Alameda Project
To: srimal.hewawitharana@lacity.org

My name is Leticia Flores,

I've been living on Central st Los Angeles for 10 years. I have been working at Impact for almost 4 years as a receptionist. I'm really happy with my position and I thank my boss for giving me this opportunity to work at Impact. Working at Impact has given me the chance to learn so many new things in the past years. I really like my job because I meet new people and I keep learning new things from all the people around me. I get more experience each year which I know that it will help me a lot and I also get to experience new things. This job has help me and my family because my dad has health problems and can't work, thus I'm the one supporting my family of seven including me. It has really helped me economically because I can give my family what they really need. E20-1

Thank you.

From: Srimal Hewawitharana
To: Eric Charlton
Subject: Fwd: I Reject the PIMA Warehouses!
Date: Friday, March 06, 2015 2:50:01 PM

---------- Forwarded message ----------
From: **Gwendolyn Forrest** <gmforrest@hotmail.com>
Date: Fri, Mar 6, 2015 at 2:03 PM
Subject: I Reject the PIMA Warehouses!
To: LA City Planning Department <srimal.hewawitharana@lacity.org>, Mayor Eric Garcetti <mayor.garcetti@lacity.org>, CD 1 Gilbert Cedillo <councilmember.cedillo@lacity.org>, CD 2 Paul Krekorian <councilmember.Krekorian@lacity.org>, CD 3 Bob Blumenfield <councilmember.blumenfield@lacity.org>, CD 4 Tom LaBonge <councilmember.Labonge@lacity.org>, CD 5 Paul Koretz <paul.koretz@lacity.org>, CD 6 Nury Martinez <councilmember.martinez@lacity.org>, CD 7 Felipe Fuentes <councilmember.fuentes@lacity.org>, CD 8 Bernard Parks <councilmember.parks@lacity.org>, "CD 9 Curren D. Price" <councilmember.price@lacity.org>, "CD 10 Herb J. Wesson" <councilmember.wesson@lacity.org>, CD 11 Mike Bonin <councilmember.bonin@lacity.org>, CD 12 Mitchell Englander <councilmember.englander@lacity.org>, CD 13 Mitch O'Farrell <councilmember.ofarrell@lacity.org>, CD 14 Jose Huizar <councilmember.huizar@lacity.org>, CD 15 Joe Buscaino <councilmember.buscaino@lacity.org>, "Supervisor 1 Hilda L. Solis" <hildasolis@bos.lacounty.gov>, Supervisor 2 Mark Ridley-Thomas <markridleythomas@bos.lacounty.gov>, Supervisor 3 Sheila Kuehl <sheila@bos.lacounty.gov>, Supervisor 4 Don Knabe <don@bos.lacounty.gov>, "Supervisor 5 Michael D. Antonovich" <fifthdistrict@lacbos.org>

02/27/2015 22:39:04
Gwendolyn Forrest
Zip Code 90026

Please resist the temptation of pitting jobs against the environment! E21-1

We need your wise leadership on this issue.

South LA Sweatshops will have long term detrimental health impact to the residents of South Central Los Angeles

The City Planning Department has announced its intention to allow 4 warehouses to be built with a substandard Draft Environmental Impact Report (Case Number: ENV-2012-920-EIR, AA-2012-919-PMLA, DIR-2013-887-SPR), a move Farm representatives and the community say will have long term detrimental health impacts for local South LA residents. Plans call for 4 warehouse facilities that will draw some 75 diesel big rigs into the area every day, creating an intolerable concentration of diesel fumes and particulate matter in a neighborhood in a warehousing district already saturated with such exhaust, posing the danger of increased risks of cancer, emphysema, asthma, and increased hospitalizations to poor people of color who live in the district. South Central Farm representative E21-2

Tezozomoc said, "This is an unmistakable and undeniable threat to the health and well being of the people who live here, and that the City Planning Department has accepted a substandard Draft Environmental Impact
Report on behalf of PIMA is a clear cut example of environmental racism."

E21-2, Cntd

I call on the city, " to unconditionally reject the DEIR and return the land to the community to anchor an environmental justice project to begin to clean up the community". It is clear that Los Angeles City has failed the residents of South LA by considering a substandard DEIR. In 2008 the City of Los Angeles reviewed a project submitted by Horowitz to do one warehouse that encompassed 437,196 sq. ft. (see Case No. ENV-2008-799-MND, VTT-61482, DIR-2008-841-SPR, aka 41st and Alameda Warehouse Project) and at that time there would be 264 truck trips per day. In the recent DEIR PIMA will be developing 481,022 sq. ft. of warehouse space; comprised of 4 buildings and over 2000 car trips per day. In PIMA's proposal they claim a mere 75 trip trucks a day. There is a difference of 189 truck trips per days for a warehouse space that is 10% larger. There is a difference of 70% in truck trips. What is problematic with this assumption is that all further analysis will be based on
the underspecified 75 truck trips per day. While this under estimation of the truck trips may get the project approved by the City; the city under Jan Perry has supported this project, it will have long negative impact on the residents of South Los Angeles.
In the realm of Air Quality Health Risk Assessment the truck trips are further down estimated to 31 diesel fueled trucks per day. The Kleinfelder's Health Risk Analysis is faulty because it also assumes a degraded amount of truck trips per day; 75 truck trips per day.

E21-3

Regional Air Quality
The air quality in Southern California does not meet the state and federal standards. The American Lung Association consistently gives Los Angeles County failing grades in the amount of ozone and particulate pollution in the air. Although smog levels are impacted by seasons and weather patterns, smog is visible in the air on most days.

E21-4

Online location of the 2015 DEIR:
http://cityplanning.lacity.org/eir/4051SoAlamedaStProj/Index.pdf
2008 MND by Horowitz http://1drv.ms/1BiXQ2k, http://1drv.ms/1BiY6OM

From: Srimal Hewawitharana
To: Eric Charlton
Subject: Fwd: 4051 Alameda Project
Date: Tuesday, March 10, 2015 8:58:43 AM

---------- Forwarded message ----------
From: <Janneth@impact4989.com>
Date: Tue, Mar 10, 2015 at 8:22 AM
Subject: 4051 Alameda Project
To: srimal.hewawitharana@lacity.org

Hi my name is Janneth Garcia,

I live on Figueroa los Angeles, over 27 years, I've been working at impact since October 2006, I started as a receptionist , then I was promoted to

Pre- production assistant and doing some production manager as well. I been learning mostly everything along the years.

Along With my knowledge my compensation has grown over the years, I've been able to achieve new things in my life and

By helping me learn many things that will help me in the future.

E22-1

working at impact has made me learn so much about the fashion design and made me understand how impact makes everything

possible to achieve everything for their customers. Me and my coworkers always try our best to achieve everything that comes to us.

I feel really happy to see famous people wearing our products that we made at impact. This job has help me to be able to help my family

In every way that I can.

Thank you

Best Regards,

Janneth Garcia

Pre Production

2118 S Compton Ave.

Los Angeles, Ca 90011

Tel: 213.746.1716

My name is Maria Garcia,

I've been living in Figueroa st Los Angeles for 24 years; I've worked for impact for 4 years as pre-production assistant in samples and developments. I have learn so many things in this past years I thank my boss for giving me this chance to work for his company. I am a single mother so this opportunity has help me a lot economic and to learn things. I love my job we get to meet new people and work big companies. I'm really happy to work with impact and experience new things. I feel glad to see famous people wearing our products that we made here at impact. This has help me so much to give my child and family all the help I can.

E23-1

From: Srimal Hewawitharana
To: Eric Charlton
Subject: Fwd:
Date: Friday, March 06, 2015 10:18:11 AM

---------- Forwarded message ----------
From: **Artemio Gonzalez** <temo0335@gmail.com>
Date: 2015-03-06 9:07 GMT-08:00
Subject:
To: srimal.hewawitharana@lacity.org

Hola mi nombre es Artemio gonzalez vivo en avalon y 41 st soy padre y sostén de 3 hijos que son mi razón de superasion en este pais tengo viviendo en los angeles 27 años y trabajo como manager en impact gracias a, mi esfuerzo y desempeño esta compañía me a dado mucho que no pensé en la vida lograr soy estoy totalmente contentó con mi trabajo y en verdad amo mi trabajo y a todo el personal qué en verdad somos una familia hoja y se puedan lograr las metas que impact pretende ya, que seria un gran favor a todos nosotros como su empleados y como personas q nesesitamos de un trabajo fijo con grandes beneficios por favor a quien corresponda este correo Muchas gracias por todo. att, Artemio gonzalez juarez

E24-1

From: Srimal Hewawitharana
To: Eric Charlton
Subject: Fwd: Please Halt Plans to Further Industrialize South LA
Date: Monday, January 26, 2015 8:53:32 AM

---------- Forwarded message ----------
From: **Crystal Gonzalez** <crystal.t.gonzalez@gmail.com>
Date: Sun, Jan 25, 2015 at 2:45 PM
Subject: Please Halt Plans to Further Industrialize South LA
To: "srimal.hewawitharana@lacity.org;" <srimal.hewawitharana@lacity.org>

Dear City of Los Angeles,

In regards to the project (4051 South Alameda Street Project), please halt the plans to build an industrial park in South Los Angeles. South LA needs more green space for its residents, not more industrial parks. I am a High School teacher. I see the dreams of youth: They want Los Angeles be a place where they can live, breath clean air, be in community, and thrive. At the moment youth feel like it is a place they want to leave, not a place they want to stay. E25-1

I understand that industrial parks have the potential to create jobs, but green spaces can also create jobs. We need to start thinking about development in sustainable and creative ways. E25-2

Please halt plans to further industrialize and contaminate South Los Angeles. E25-3

Sincerely,
Crystal Gonzalez

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Maria Valentina Gonzalez
4865 Ascot Ave.
Los Angeles, CA 90011

March 8, 2015

To whom it may concern,

I Maria Valentina Gonzalez have been employed by Mr. Tony Yuu since 1998 - 3-9-2015 to present. I'm writing this letter of recommendation for Mr. Yuu. He has been a fair employer and has helped his employees in any way possible. I've been very happy working for him and would like for his plans with his company to come to reality, making easier for everyone to work together. If any questions should arise, please feel free to contact me at (323) 514-1805.

E26-1

Sincerely,

Maria V. Gonzalez

From: Srimal Hewawitharana
To: Eric Charlton
Subject: Fwd: Draft EIR re: use of crucial South Los Angeles land
Date: Monday, March 09, 2015 12:07:49 PM

---------- Forwarded message ----------
From: **Ira L. Gottlieb** <buddyg@bushgottlieb.com>
Date: Mon, Mar 9, 2015 at 9:36 AM
Subject: Draft EIR re: use of crucial South Los Angeles land
To: "Srimal.hewawitharana@lacity.org" <Srimal.hewawitharana@lacity.org>
Cc: Marcy Winograd <winogradteach@gmail.com>

Srimal Hewawitharana, Environmental Specialist II

Los Angeles City Planning Department

EIR Analysis Section

200 N. Spring Street, Room 750

Los Angeles, CA 90012

Srimal.hewawitharana@lacity.org

Re: Comments on the Draft EIR, Case NO. ENV-2012-919-PMLA, DIR-O203-887-SPR, State Clearinghouse Number 2014061030.

Dear Ms. Hewawitharana:

I am a senior partner union-side labor law attorney with the law firm of Bush Gottlieb, located in Glendale, CA. Although my office is not located within the City of Los Angeles, I represent clients with offices in the City and unions with many members who reside in town, and thus have a stake in the future of Los Angeles as a neighbor living adjacent to the great megalopolis that LA has become. E27-1

I am writing to request revisions in the DEIR for the long-disputed tract of land in South Los Angeles slated for industrial development. I ask that you reconsider your department's failure to recognize the community value in designating the land for gardening and recreational purposes. E27-2

I have lived in the Los Angeles region for almost 29 years, and am dismayed by the paucity of green space in our concrete-bound culture, both generally and as the shortage is unjustly distributed within the City. A quick Google search reveals comments like "South L.A. is ankle-deep in the worst public land deficit in the city" (http://www.oncentral.org/news/2011/12/22/south-ls-park-struggle/). That article published in 2011 went on to note that

> "A report issued by the Trust for Public Land, national non-profit aimed at developing public spaces in underserviced areas, found that there were roughly 6.2 acres per every 1,000 people in Los Angeles. It's even worse if you look at individual communities. A study conducted by the UCLA Institute of Environment and Sustainability in 2006 found that African-American and Latino communities receive .8 and 1.6 acres per 1,000 persons respectively, with South Los Angeles averaging less than half an acre per 1,000 residents." E27-3

In 2009, a story about the opening of a park in the Baldwin Hills area remarked upon how then City Councilman Mark Ridley-Thomas joked, with some no doubt intended irony, that he was suffering from "nature-deficit disorder." (http://switchboard.nrdc.org/blogs/dnagami/tackling_nature_deficit_disord.html) That article further observed "Urban Los Angeles is one of the most park-poor areas in the nation, with fewer acres of parkland per resident than any other major city. Without adequate green space, these often lower-income communities of color don't receive the many benefits that come with parks, like a healthier local environment, access to low-cost recreation, and the chance to experience and connect with nature up close."

That malady is not unique to high-profile city officials, and has by no means been cured or even mitigated in more recent years. Specifically, I would like E27-4

to draw your attention to a critical study of the American Institute of Architects (California Council) conducted in 2012 that documented inequities between South Los Angeles and other parts of LA lacking in greenery, open space, and recreational facilities. Click below to read the study:

E27-4, Cntd

http://www.aiacc.org/2012/05/29/20792/

If you scroll on the site, you'll note South LA is categorized under the classification of "park poverty" with only 783 acres of parkland, in contrast to West LA with 16, 497 acres. This reflects a history of protecting Westside communities from overdevelopment and allowing some green space to survive against the onslaught of development, but also shows a different, disparate outcome when considering the areas of the most dense populations in the City, which of course need the green space the most:

> . . . those areas with 75% or more Latino population (188 census tracts, with over 770,000 residents) had only 0.6 park acres per 1,000 population, and heavily African-American dominated tracts (11 census tracts with almost 50,000 residents) had 1.7 park acres per 1,000 population. In comparison, heavily White dominated areas (117 census tracts with almost 480,000 residents) enjoyed 31.8 park acres per 1,000 residents.

The implications of this disparity and park shortage in disadvantaged densely populated areas are dramatic for young people who have no place to go to run, to chase, kick and throw a ball, enjoy the thrill of competitive sports, or just gain respite from the drabness of concrete walls and whir of commerce. As a former camp counselor, sports director and avid basketball player born and raised in New York City, I've learned first-hand how important it is, both in terms of physical and mental health, for young people to have parks nearby. As Mahatma Gandhi taught us, "It is health that is real wealth and not pieces of gold and silver."

When we have a choice about what to do with substantial swaths of

E27-5

undeveloped acreage in disadvantaged communities, this green space deficit and the need to serve the future needs of youth (and the not-so-young -- directly and for community quality of life all derive) must be carefully taken into account, with heavy weight afforded to the value of maintaining and enhancing open recreational space. E27-5, Cntd

Please revise this DEIR to take into consideration the indispensable community value in setting aside this land for gardening and recreation. E27-6

Thank you for your public service, and I appreciate your consideration.

Sincerely,

Ira L. Gottlieb

Bush Gottlieb

500 North Central Avenue, Suite 800

Glendale, California 91203

818 973-3219 (office)

818 398-7666 (cell)

818 973-3201 (fax)

From: Srimal Hewawitharana
To: Eric Charlton
Subject: Fwd: South Central Farm
Date: Monday, March 09, 2015 12:08:55 PM

---------- Forwarded message ----------
From: **Lisa Green** <lisaannverde@gmail.com>
Date: Mon, Mar 9, 2015 at 10:55 AM
Subject: South Central Farm
To: Srimal.hewawitharana@lacity.org

March 9, 2015
Srimal Hewawitharana ,Environmental Specialist II
Los Angeles City Planning Department
EIR Analysis Section
200 N. Spring Street, Room 750
Los Angeles, CA 90012
Srimal.hewawitharana@lacity.org

Re: Comments on the Draft EIR, Case NO. ENV-2012-919-PMLA, DIR-O203-887-SPR, State Clearinghouse Number 2014061030.

Dear Ms. Hewawitharana:

I am a former State Assembly Candidate and a current member of the Green Party of Los Angeles and California. I am writing you regarding the DEIR concerning the land known as the South Central Farm. I am an artist in Venice as well as a life coach and spiritual guide for many. Our greater Los Angeles area is riddled with individuals who are suffering from the effects of over population in an urban environment. Noise, traffic, over emphasis on work, and a host of other maladies are affecting people at an alarm rate. Many of my clients have lost their connection to the Earth, our home, and with nature. E28-1

I am in opposition of the DEIR based on the following points from the report:

The DEIR's conclusion that community gardens do not carry local community value. E28-2

The DEIR fails to recognize the community value in using the land for recreational purposes. E28-3

One of the healing remedies I suggest to people is to get back to nature in our urban jungle. Walk in the park, listen to the birds, sit by a tree, put your hands in the soil. Gardening is a very healthy way to heal the self, and to grow food for yourself and your community. Life is about choices and more people are seeking a path towards holistic living which includes contributing to your own food supply. Community gardens are beautiful, serene and empowering ways for communities to live and play together while producing with natures assistance a fuel for our bodies, hearts and souls. E28-4

It makes me wonder how many of your staff actually spend time engaged with nature and the environment? For report seems to show a level of ignorance and promotes neglect that is not a path to wholeness.

E28-4, Cntd

Please re-do this DEIR to take into consideration the abundant community values in using this land for gardening and recreation. Please take time to get outdoors and commune with nature.

E28-5

Sincerely,

--

Lisa Green

From: Srimal Hewawitharana
To: Eric Charlton
Subject: Fwd: 4051 Alameda Project
Date: Monday, March 09, 2015 12:12:13 PM

---------- Forwarded message ----------
From: **Nelly Hernandez** <sach.nelly@gmail.com>
Date: Mon, Mar 9, 2015 at 11:04 AM
Subject: 4051 Alameda Project
To: srimal.hewawitharana@lacity.org

Hi, my name is Nallely Hernandez. I live by Hooper and Naomi. I have resided in the Los Angeles area for 20 years. I am employed in X-Factory and have been working here a little over 6 months. I was a stay at home mother before I began working so working here has given me so much work experience and so much knowledge. I am constantly growing within my field, garment pre-production/production. Our employer, mister Tony Yu has always been so attentive towards us, his employees. Our work environment always feels safe and we as a company are constantly striving for better. We take pride in the garments produced as we work hard to make sure every detail of the garment is perfect. I enjoy working here because I always receive the best support from my colleagues if I have a family emergency. I am so happy that I am able to provide for my 2 children. E29-1

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Hola mi Nombre es Norma hernandez

Yo tengo 17 años Viviendo en la area de Los Angelos CA. # 9324 Jannes St.

y Yo estoy muy agradesida con Dios y el dueño de trabajo IMPACT.

Ya es un año que medio la oportunidad. de ser parte de IMPACT en el area de inspecionar la Ropa (triming) gracias a este trabajo es un gran beneficio para mi familia mis hijos y Yo estare. Dispuesta a mejorar cadadia mas en mi trabajo. Mesiento orgullosa de ver estas marcas de Ropa en la tv. porque mesiento parte del proyecto IMPACT. y Espero Que IMPACT sea mas grande y productiva mas que Ahoras y tengamos mucho mas trabajo dada dia mas

E30-1

Gracias IMPACT

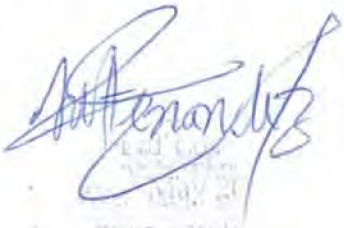
Att. Norma Hernandez Dios los bendiga

Hi my name is Salvador E. Hernandez,

I live on Hooper Street of Los Angeles. I have lived in Los Angeles since 2006. I've been working at Poetry since May 2006. I am currently in the shipping department. With this job, I have been able to support my family. It has helped me become a better member of my family.

Working at Poetry has been a great experience. Poetry's working environment is professional and very great. I look forward to working with my co-workers every day. We get through the good times and bad times together, while always looking to help each other towards success. The product that our company sells brings happiness to many people around the world. By providing great merchandise, we give people opportunities for their business while providing people what they want. We help support, by giving jobs, not only here in Los Angeles, but also in China. I am happy to say Poetry is a great company. E31-1

Thank You.



Hola mi nombre es Salvador E. Hernandez,

Yo vivo en la calle Hooper de Los Ángeles. He vivido en Los Angeles desde 2006. He estado trabajando en la compania de Poetry desde mayo de 2006. Actualmente estoy en el departamento de envios. Con este trabajo, he sido capaz de mantener a mi familia. Me ha ayudado a ser un mejor miembro de mi familia.

Trabajar en Poetry ha sido una gran experiencia. Entorno de trabajo de Poetry es profesional y muy grande. Espero con interés trabajar con mis compañeros de trabajo todos los días. Recibimos a través de los buenos y malos momentos juntos, pero siempre mirando para ayudarnos unos a otros hacia el éxito. El producto que nuestra empresa vende trae felicidad a muchas personas alrededor del mundo. Al proporcionar la mercancía, nos damos a la gente oportunidades para su negocio mientras que proporciona a la gente lo que ellos quieren. Ayudamos apoyo, dando puestos de trabajo, no sólo aquí en Los Ángeles, pero también en China. Estoy feliz de decir que la Poetry es una gran compañía.

Muchas gracias.



Ola soi Fausto Herrera
Tengo 25 años en impa
Conosco a mi patron es
mui buen patron siempre nos
tiene trabando
nos da oras
extras yo me siento
mui contento con mi
trabajo y mis compañeros
me llebo bien no me
gustan los problemas
Gracias patron por ser tan
bueno como tu ai pocos

atentamente

Fausto Herrera

E32-1

RECEIVED
CITY OF LOS ANGELES
MAR 23 2015
ENVIRONMENTAL
UNIT

From: Srimal Hewawitharana
To: Eric Charlton
Subject: Fwd: 4051 Alameda Project
Date: Friday, March 06, 2015 10:17:33 AM

---------- Forwarded message ----------
From: **Karen Iglesias** <kareni2@me.com>
Date: Fri, Mar 6, 2015 at 9:42 AM
Subject: 4051 Alameda Project
To: srimal.hewawitharana@lacity.org

Hi my name is Karen Iglesias,

I live on Eastlake Ave Los Angeles, I've lived in Los Angeles for about 8 years.

I've been working at Impact since August 2008, I started here as a receptionist, then I was promoted to

pre-production assistant now I'm production manager assistant, along with the knowledge my compensation has grown, I've been able to afford a better living and help my family too.

E33-1

Work for Impact is a great experience, I consider my coworkers and boss as my second family, we celebrate success and birthdays with happiness and share great moments.

I'm so proud to work at Impact and when I realize that is when I see on TV Shows some products of our clients that we have made here.

Thank you.

LETTER E34

RECEIVED
CITY OF LOS ANGELES
MAR 23 2015
ENVIRONMENTAL
UNIT

Mi nombre es: Arcadio Jacinto

Quiero hablar sobre mi trabajo y
Mi patron mi trabajo es cocer ropa
tengo poco trabajando en la fabrica y
la verdad es que estoy muy contento
con el patron es muy responsable
es un patron que le gusta el ambiente
y sobre todo es muy bueno nunca
nos ha fallado siempre tenemos trabajo y
quiero agradecerle por todo estodo

E34-1

Gracias

Hi my name is David Jo,

I live on Westmoreland Avenue of Los Angeles. I have lived in Los Angeles for all my life. I've been working at Poetry since February 2014. I am currently in the sales department. I do multiple things for my job: sales, shipping company PO's, invoices, and also packing merchandise. With this job, I have been able to support my family. It has helped me become a better member of my family.

Working at Poetry has been a great experience. Poetry's working environment is professional and very great. I look forward to working with my co-workers every day. We get through the good times and bad times together, while always looking to help each other towards success. The product that our company sells brings happiness to many people around the world. By providing great merchandise, we give people opportunities for their business while providing people what they want. We help support, by giving jobs, not only here in Los Angeles, but also in China. I am happy to say Poetry is a great company. E35-1

Thank You.

Hola mi nombre es David Jo,

Yo vivo en Westmoreland Avenida de Los Angeles. He vivido en Los Angeles para toda mi vida. He estado trabajando en la compania de Poetry desde febrero de 2014. Actualmente estoy en el departamento de ventas. Hago varias cosas para mi trabajo: ventas, enviando POs, facturas, y también el embalaje de mercancías. Con este trabajo, he sido capaz de mantener a mi familia. Me ha ayudado a ser un mejor miembro de mi familia.

Trabajar en Poetry ha sido una gran experiencia. Entorno de trabajo de Poetry es profesional y muy grande. Espero con interés trabajar con mis compañeros de trabajo todos los días. Recibimos a través de los buenos y malos momentos juntos, pero siempre mirando para ayudarnos unos a otros hacia el éxito. El producto que nuestra empresa vende trae felicidad a muchas personas alrededor del mundo. Al proporcionar la mercancía, nos damos a la gente oportunidades para su negocio mientras que proporciona a la gente lo que ellos quieren. Ayudamos apoyo, dando puestos de trabajo, no sólo aquí en Los Ángeles, pero también en China. Estoy feliz de decir que la Poetry es una gran compañía.

Muchas gracias.

LETTER E36

From: Srimal Hewawitharana
To: Eric Charlton
Subject: Fwd: Draft EIR Case No. ENV-2012-919-PMLA
Date: Monday, March 09, 2015 2:12:13 PM

---------- Forwarded message ----------
From: **Kathy Knight** <kathy.knight@verizon.net>
Date: Mon, Mar 9, 2015 at 12:47 PM
Subject: Draft EIR Case No. ENV-2012-919-PMLA
To: Srimal.hewawitharana@lacity.org

March 9, 2014

Srimal Hewawitharana ,Environmental Specialist II
Los Angeles City Planning Department
EIR Analysis Section
200 N. Spring Street, Room 750
Los Angeles, CA 90012
Srimal.hewawitharana@lacity.org

Re: Comments on the Draft EIR, Case NO. ENV-2012-919-PMLA, DIR-O203-887-SPR, State Clearinghouse Number 2014061030.

Dear Ms. Hewawitharana:

Please do not accept the Draft EIR in its current form. It goes against the Open Space element in the City's master plan by opting against preservation and restoration of green open space in favor of more industrial uses. The highest use of this parcel would be to return it to the community as an urban garden with recreational opportunities. E36-1

The DEIR's conclusion that community gardens do not carry local community value and economic benefits is insensitive to communities of color. For the people of South LA, access to healthy food – broccoli, asparagus, tomatoes (as opposed to chips, sodas, and candy), as well as skills to produce this food -- are matters of life and death, of sight and blindness. E36-2

Also, we spend a huge amount of tax funds on jails in Los Angeles. But it has been shown that when children can grow food in community gardens with their families, they eat better and the crime rate goes down. It is a healthy activity for families to do together. Where is the impact of this shown in the DEIR? E36-3

In addition, the DEIR needs to study in detail the health and mental benefits of children in that area having open space to enjoy for recreation. E36-4

Please re-do this DEIR to take into consideration the abundant community values in using this land for gardening and recreation. E36-5

Thank you for your public service.

Sincerely,

Kathy Knight

1122 Oak St.
Santa Monica, CA 90405

Hi my name is Bryan Lee,

I live on Georgia Street of Los Angeles. I have lived in Los Angeles all my life. I've been working at Poetry since September 2008. I am currently in the sales department. I do multiple things for my job: sales, shipping company POs, invoices and also packing merchandise. With this job, I have been able to support my family. It has helped me become a better member of my family.

Working at Poetry has been a great experience. Poetry's working environment is professional and very great. I look forward to working with my co-workers every day. We get through the good times and bad times together, while always looking to help each other towards success. The product that our company sells brings happiness to many people around the world. By providing great merchandise, we give people opportunities for their business while providing people what they want. We help support, by giving jobs, not only here in Los Angeles, but also in China. I am happy to say Poetry is a great company. E37-1

Thank You. Bryan Lee

Hola mi nombre es Enrique Vasquez,

Yo vivo en la calle Georgia de Los Ángeles. He vivido en Los Angeles para toda mi vida. He estado trabajando en la compania de Poetry desde septiembre de 2008. Actualmente estoy en el departamento de ventas. Hago varias cosas para mi trabajo: ventas, enviando POs, facturas, y también el embalaje de mercancías. Con este trabajo, he sido capaz de mantener a mi familia. Me ha ayudado a ser un mejor miembro de mi familia.

Trabajar en Poetry ha sido una gran experiencia. Entorno de trabajo de Poetry es profesional y muy grande. Espero con interés trabajar con mis compañeros de trabajo todos los días. Recibimos a través de los buenos y malos momentos juntos, pero siempre mirando para ayudarnos unos a otros hacia el éxito. El producto que nuestra empresa vende trae felicidad a muchas personas alrededor del mundo. Al proporcionar la mercancía, nos damos a la gente oportunidades para su negocio mientras que proporciona a la gente lo que ellos quieren. Ayudamos apoyo, dando puestos de trabajo, no sólo aquí en Los Ángeles, pero también en China. Estoy feliz de decir que la Poetry es una gran compañía.

Muchas gracias.

X Bryan Lee

LETTER E38

3/13/15

RECEIVED
CITY OF LOS ANGELES
APR 03 2015
ENVIRONMENTAL UNIT

Mi nombre es Carlos Lopez.

Eh estado trabajando aproximadamente por 5 años aqui (IMPACT) y pienso que hacemos buen trabajo y muy buena calidad.

Hasta este momento me siento bien a gusto trabajando aqui pienso que el ambiente de trabajo es muy amena.

Por la experiencia que tengo trabajando en esto para mi esta a sido uno de los mejores que e encontrado.

Espero seguir por mucho tiempo y que la compañia siga creciendo.

E38-1

From: Srimal Hewawitharana
To: Eric Charlton
Subject: Fwd: I Reject the PIMA Warehouses!
Date: Friday, March 06, 2015 2:54:24 PM

---------- Forwarded message ----------
From: **jose lopez** <joseclopez@hotmail.com>
Date: Fri, Mar 6, 2015 at 2:03 PM
Subject: I Reject the PIMA Warehouses!
To: LA City Planning Department <srimal.hewawitharana@lacity.org>, Mayor Eric Garcetti <mayor.garcetti@lacity.org>, CD 1 Gilbert Cedillo <councilmember.cedillo@lacity.org>, CD 2 Paul Krekorian <councilmember.Krekorian@lacity.org>, CD 3 Bob Blumenfield <councilmember.blumenfield@lacity.org>, CD 4 Tom LaBonge <councilmember.Labonge@lacity.org>, CD 5 Paul Koretz <paul.koretz@lacity.org>, CD 6 Nury Martinez <councilmember.martinez@lacity.org>, CD 7 Felipe Fuentes <councilmember.fuentes@lacity.org>, CD 8 Bernard Parks <councilmember.parks@lacity.org>, "CD 9 Curren D. Price" <councilmember.price@lacity.org>, "CD 10 Herb J. Wesson" <councilmember.wesson@lacity.org>, CD 11 Mike Bonin <councilmember.bonin@lacity.org>, CD 12 Mitchell Englander <councilmember.englander@lacity.org>, CD 13 Mitch O'Farrell <councilmember.ofarrell@lacity.org>, CD 14 Jose Huizar <councilmember.huizar@lacity.org>, CD 15 Joe Buscaino <councilmember.buscaino@lacity.org>, "Supervisor 1 Hilda L. Solis" <hildasolis@bos.lacounty.gov>, Supervisor 2 Mark Ridley-Thomas <markridleythomas@bos.lacounty.gov>, Supervisor 3 Sheila Kuehl <sheila@bos.lacounty.gov>, Supervisor 4 Don Knabe <don@bos.lacounty.gov>, "Supervisor 5 Michael D. Antonovich" <fifthdistrict@lacbos.org>

02/28/2015 01:08:56
jose lopez
Zip Code 90016

South LA Sweatshops will have long term detrimental health impact to the residents of South Central Los Angeles

The City Planning Department has announced its intention to allow 4 warehouses to be built with a substandard Draft Environmental Impact Report (Case Number: ENV-2012-920-EIR, AA-2012-919-PMLA, DIR-2013-887-SPR), a move Farm representatives and the community say will have long term detrimental health impacts for local South LA residents. Plans call for 4 warehouse facilities that will draw some 75 diesel big rigs into the area every day, creating an intolerable concentration of diesel fumes and particulate matter in a neighborhood in a warehousing district already saturated with such exhaust, posing the danger of increased risks of cancer, emphysema, asthma, and increased hospitalizations to poor people of color who live in the district. South Central Farm representative Tezozomoc said, "This is an unmistakable and undeniable threat to the health and well being of the people who live here, and that the City Planning Department has accepted a substandard Draft Environmental Impact
Report on behalf of PIMA is a clear cut example of environmental racism."

E39-1

I call on the city, " to unconditionally reject the DEIR and return the land to the community to anchor an environmental justice project to begin to clean up the community". It is clear that Los Angeles City has failed the residents of South LA by considering a substandard DEIR. In 2008 the City of Los Angeles reviewed a project submitted by Horowitz to do one warehouse that encompassed 437,196 sq. ft. (see Case No. ENV-2008-799-MND, VTT-61482, DIR-2008-841-SPR, aka 41st and Alameda Warehouse Project) and at that time there would be 264 truck trips per day. In the recent DEIR PIMA will be developing 481,022 sq. ft. of warehouse space; comprised of 4 buildings and over 2000 car trips per day. In PIMA's proposal they claim a mere 75 trip trucks a day. There is a difference of 189 truck trips per days for a warehouse space that is 10% larger. There is a difference of 70% in truck trips. What is problematic with this assumption is that all further analysis will be based on
the underspecified 75 truck trips per day. While this under estimation of the truck trips may get the project approved by the City; the city under Jan Perry has supported this project, it will have long negative impact on the residents of South Los Angeles.
In the realm of Air Quality Health Risk Assessment the truck trips are further down estimated to 31 diesel fueled trucks per day. The Kleinfelder's Health Risk Analysis is faulty because it also assumes a degraded amount of truck trips per day; 75 truck trips per day.

E39-2

Regional Air Quality
The air quality in Southern California does not meet the state and federal standards. The American Lung Association consistently gives Los Angeles County failing grades in the amount of ozone and particulate pollution in the air. Although smog levels are impacted by seasons and weather patterns, smog is visible in the air on most days.

E39-3

Online location of the 2015 DEIR:
http://cityplanning.lacity.org/eir/4051SoAlamedaStProj/Index.pdf
2008 MND by Horowitz http://1drv.ms/1BiXQ2k, http://1drv.ms/1BiY6OM

LETTER E40

RECEIVED
CITY OF LOS ANGELES
MAR 23 2015
ENVIRONMENTAL
UNIT

Hola Mi nombre es Maria Lorenzo
tengo 20 años viviendo en los
Ang. CA. yo trabajo en esta
Compania inpac Mi ocupación es
inpección tengo 5 años trabajando
en esta Compania mi patron
es muy amable con nosotros
y Me justa como nos trata
y me siento muy contenta
trabajando

E40-1

atentamente

Maria Lorenzo

LETTER E41

RECEIVED
CITY OF LOS ANGELES
MAR 23 2015
ENVIRONMENTAL
UNIT

ADULFO MARIN

IMPACT

trabajo Para ~~[illegible]~~ desde
Septiembre de 2012-
y tengo biviendo en los
Angeles CAL. desde el Año
1997- todi es el mejor
Patron que etenido me Paga mux
bien nos trata mux bien.
nos da 3 breis y todo
muy bien Atentamente
ADULFO MARIN.
bivo en
1040 E. 43 St. LA-CA. 90011

E41-1

Juliana Martinez
tengo 20 años vivido
en los angeles ca
tego trabagado ala compania
5 año estoy contenta traba
gando aqui en esta compania
eteNido trabago

RECEIVED
CITY OF LOS ANGELES
APR 03 2015
ENVIRONMENTAL
UNIT

E42-1

From: Srimal Hewawitharana
To: Eric Charlton
Subject: Fwd: I Reject the PIMA Warehouses!
Date: Friday, March 06, 2015 2:38:57 PM

---------- Forwarded message ----------
From: **Mario Montano** <mmontano@coloradocollege.edu>
Date: Fri, Mar 6, 2015 at 1:59 PM
Subject: I Reject the PIMA Warehouses!
To: LA City Planning Department <srimal.hewawitharana@lacity.org>, Mayor Eric Garcetti <mayor.garcetti@lacity.org>, CD 1 Gilbert Cedillo <councilmember.cedillo@lacity.org>, CD 2 Paul Krekorian <councilmember.Krekorian@lacity.org>, CD 3 Bob Blumenfield <councilmember.blumenfield@lacity.org>, CD 4 Tom LaBonge <councilmember.Labonge@lacity.org>, CD 5 Paul Koretz <paul.koretz@lacity.org>, CD 6 Nury Martinez <councilmember.martinez@lacity.org>, CD 7 Felipe Fuentes <councilmember.fuentes@lacity.org>, CD 8 Bernard Parks <councilmember.parks@lacity.org>, "CD 9 Curren D. Price" <councilmember.price@lacity.org>, "CD 10 Herb J. Wesson" <councilmember.wesson@lacity.org>, CD 11 Mike Bonin <councilmember.bonin@lacity.org>, CD 12 Mitchell Englander <councilmember.englander@lacity.org>, CD 13 Mitch O'Farrell <councilmember.ofarrell@lacity.org>, CD 14 Jose Huizar <councilmember.huizar@lacity.org>, CD 15 Joe Buscaino <councilmember.buscaino@lacity.org>, "Supervisor 1 Hilda L. Solis" <hildasolis@bos.lacounty.gov>, Supervisor 2 Mark Ridley-Thomas <markridleythomas@bos.lacounty.gov>, Supervisor 3 Sheila Kuehl <sheila@bos.lacounty.gov>, Supervisor 4 Don Knabe <don@bos.lacounty.gov>, "Supervisor 5 Michael D. Antonovich" <fifthdistrict@lacbos.org>

02/27/2015 17:25:36
Mario Montano
Zip Code 80909

South LA Sweatshops will have long term detrimental health impact to the residents of South Central Los Angeles

The City Planning Department has announced its intention to allow 4 warehouses to be built with a substandard Draft Environmental Impact Report (Case Number: ENV-2012-920-EIR, AA-2012-919-PMLA, DIR-2013-887-SPR), a move Farm representatives and the community say will have long term detrimental health impacts for local South LA residents. Plans call for 4 warehouse facilities that will draw some 75 diesel big rigs into the area every day, creating an intolerable concentration of diesel fumes and particulate matter in a neighborhood in a warehousing district already saturated with such exhaust, posing the danger of increased risks of cancer, emphysema, asthma, and increased hospitalizations to poor people of color who live in the district. South Central Farm representative Tezozomoc said, "This is an unmistakable and undeniable threat to the health and well being of the people who live here, and that the City Planning Department has accepted a substandard Draft Environmental Impact
Report on behalf of PIMA is a clear cut example of environmental racism."

E43-1

I call on the city, " to unconditionally reject the DEIR and return the land to the community to anchor an environmental justice project to begin to clean up the community". It is clear that Los Angeles City has failed the residents of South LA by considering a substandard DEIR. In 2008 the City of Los Angeles reviewed a project submitted by Horowitz to do one warehouse that encompassed 437,196 sq. ft. (see Case No. ENV-2008-799-MND, VTT-61482, DIR-2008-841-SPR, aka 41st and Alameda Warehouse Project) and at that time there would be 264 truck trips per day. In the recent DEIR PIMA will be developing 481,022 sq. ft. of warehouse space; comprised of 4 buildings and over 2000 car trips per day. In PIMA's proposal they claim a mere 75 trip trucks a day. There is a difference of 189 truck trips per days for a warehouse space that is 10% larger. There is a difference of 70% in truck trips. What is problematic with this assumption is that all further analysis will be based on
the underspecified 75 truck trips per day. While this under estimation of the truck trips may get the project approved by the City; the city under Jan Perry has supported this project, it will have long negative impact on the residents of South Los Angeles.
In the realm of Air Quality Health Risk Assessment the truck trips are further down estimated to 31 diesel fueled trucks per day. The Kleinfelder's Health Risk Analysis is faulty because it also assumes a degraded amount of truck trips per day; 75 truck trips per day.

E43-2

Regional Air Quality
The air quality in Southern California does not meet the state and federal standards. The American Lung Association consistently gives Los Angeles County failing grades in the amount of ozone and particulate pollution in the air. Although smog levels are impacted by seasons and weather patterns, smog is visible in the air on most days.

E43-3

Online location of the 2015 DEIR:
http://cityplanning.lacity.org/eir/4051SoAlamedaStProj/Index.pdf
2008 MND by Horowitz http://1drv.ms/1BiXQ2k, http://1drv.ms/1BiY6OM

LETTER E44

From:	Srimal Hewawitharana
To:	Eric Charlton
Subject:	Fwd: URGENT: Comments on Draft EIR, Case No. ENV-2012-919-PMLA, DIR-O203-887-SPR, State Clearinghouse Number 2014061030
Date:	Monday, March 09, 2015 12:18:30 PM

---------- Forwarded message ----------
From: **Leslie Jeanne Morava** <lesliemorava@gmail.com>
Date: Mon, Mar 9, 2015 at 11:42 AM
Subject: URGENT: Comments on Draft EIR, Case No. ENV-2012-919-PMLA, DIR-O203-887-SPR, State Clearinghouse Number 2014061030
To: Srimal.hewawitharana@lacity.org

Dear Ms. Hewawitharana:

The Draft EIR in its current form for the site @ 41st & Alameda St. goes against the Open Space element in the City's master plan.

Please on the public's behalf, reject it.

It's choosing to go against preservation and restoration of green, open space in favor of industrial uses. E44-1

The highest use of this parcel would be to return it to the community as an urban garden, with recreational opportunities! E44-2

Cumulative impacts of diesel trucks required for warehouse activity will add to the area's already unacceptable level of air and noise pollution. E44-3

It will also impact pedestrian and automobile safety by increasing traffic congestion adjacent to residential areas and the Metro Blue Line. E44-4

The DEIR's conclusion that community gardens do not carry local community value and economic benefits is extremely short-sighted and insensitive to communities of color, and communities in need. During operation of the South Central Farm years, it was proven to reduce crime in the area significantly, as well. E44-5

For the people of South LA, access to healthy food – broccoli, asparagus, tomatoes (as opposed to chips, sodas, and candy), as well as skills to produce this food -- are matters of life and death, of sight and blindness. In essence, the DEIR's conclusion negating community value of organic gardens sends a Marie Antoinette message – not let them eat cake, but let them feast on salt, sugar, and fat while other more fortunate areas of Los Angeles enjoy the privilege of eating healthy food and living robust lives. E44-6

I was equally appalled to read that the DEIR fails to recognize the community value in using the land for recreational purposes. Are we to believe there is a positive net gain in setting aside the land for polluting industrial use, for possible release of carcinogens and other toxins, rather than giving the children of Los Angeles a place to play and run and get in shape? This is a shameful conclusion, truly embarrassing to read. E44-7

Please re-do this DEIR to take into consideration the abundant community values in using this land for gardening and recreation. E44-8

Thank you in advance for your consideration!

With Kind Regards,

Leslie J. Morava

Leslie Jeanne Morava - Casting & Production
GOLDEN DOLPHIN PRODUCTIONS, INC.
16160 W. Sunset Blvd. Ste. C
Pacific Palisades, CA 90272
310-454-1550 ofc.
310-428-9380 cell.
310-496-0738 fax.
www.lesliejeannemoravaproductions.com
www.goldendolphinfilms.com

"All truths are easy to understand once they are discovered; the point is to discover them." ~ Galileo Galilei

RECEIVED
CITY OF LOS ANGELES
MAR 23 2015
ENVIRONMENTAL UNIT

Hola Mi nombre es Leonila Muñoz
E vivido cerca de 15 anos en los Angeles
E trabajado en Impact
e trabajado Durante 5 años
Gracias a este trabajo es sobre salido en mi hogar y con mis hijos.
y tambien gracias a este trabajo puedo ayudar a mis hija en la Univercidad,
Estoy muy contenta ya que gracias a este trabajo he sobre salido y llevar una vida feliz
el patron es muy bueno le gusta convivir con sus trabajadores y tambien le gusta trabajar

E45-1

LETTER E46

From: Srimal Hewawitharana
To: Eric Charlton
Subject: Fwd: ENV-2012-920-EIR, AA-2012-919-PMLA, DIR-2013-887 –SPR
Date: Monday, March 09, 2015 2:39:57 PM

---------- Forwarded message ----------
From: **Jack Neff** <jackneff01@yahoo.com>
Date: Mon, Mar 9, 2015 at 2:30 PM
Subject: ENV-2012-920-EIR, AA-2012-919-PMLA, DIR-2013-887 –SPR
To: Srimal Hewawitharana <srimal.hewawitharana@lacity.org>

TO: Srimal Hewawitharan, City of Los Angeles Department of Planning
Project Name: 4051 South Alameda Street Project
Project Location/Address: 4051 South Alameda Street, Los Angeles, California, 90058
CASE NO.: ENV-2012-920-EIR, AA-2012-919-PMLA, DIR-2013-887 –SPR

Ms. Hewawitharana -In Re the above referenced matter, these public comments are truncated to a miniscule degree of the scope of all the issues this Commenter needs to note concerning that certain real estate within the City of Los Angeles designated within City Planning's file going forward as the above-referenced matter.

Firstly, it appears critical documents concerning public safety and traffic impacts have been indexed as being in the proposed Draft EIR, but are not locatable at the citations provided by City Planning. E46-1

These documents are shown on the List of Tables, Vol. I, Secs. I-IX:
Appendix IV: IV.B-10 Proposed Project Traffic Conditions for 2016 ..... IV.B-20
IV.G-2 2014 Existing Traffic Conditions IV.G-7
IV.G-3 Freeway Segment Analysis..... IV.G-8
IV.G-4 Freeway Off-Ramp Analysis IV.G-8
IV.G-5 Level of Service Descriptions..... IV.G-11
IV.G-6 Level of Service Criteria IV.G-12
IV.G-7 Proposed Project Traffic Conditions for 2016 ..... IV.G-14

As such, this comment firstly requests additional time beyond, up to and including an additional 45 days from the noticed closing of Public Comments on March 9, 2015 at 4:00 p.m., or June 14, 2015, to submit crucial supplemental comments to necessarily confront the specifics of the dollar amount in concessions the developer is asking from the City, concessions in accountability of various sister governmental and public sector entities along the overlying jurisdictions controlling that certain area of real estate within the City of Los Angeles designated within City Planning's file going forward as the above-referenced matter. E46-2

Controversies abound on the face of the proposed draft EIR in the City Planning file, beginning with the document therein entitled "NOTICE OF COMPLETION AND AVAILABILITY OF ENVIRONMENTAL IMPACT REPORT ENV-2012-920-EIR; STATE CLEARINGHOUSE NUMBER: 2014061030", dated January 22, 2015 (the "NOP"). E46-3

On page 2 therein, topic entitled "ANTICIPATED SIGNIFICANT ENVIRONMENTAL EFFECTS" I note one of the significant impacts identified by City Planners was "greenhouse gas emissions, hazards and hazardous materials, and land use and planning." Although City Planners say that as proposed, according to this same document from City Planning's file, the proposed new construction, "With implementation of the proposed mitigation measures" will likely have "no significant and unavoidable project or cumulative impacts in these issue areas addressed in the EIR are expected with regard to construction or operation of the proposed project."

E46-3, Cntd

The developer is conceding the controversial nature of the project, and so the issue of bias of City Planners is present. Questions concerning conflicting "Anticipated Significant Environmental Effects" must be addressed and more time is necessary to determine which of the "anticipated significant environmental effects" will receive priority in the course of mitigation and going forward to approval of the proposed draft EIR.

E46-4

The proposed Draft EIR is a fraction of the material within City Planning's file, which references therein the South East Los Angeles Community Plan (the "Plan"), which in its current state is a work in progress, with various controversial proposals competing for the imprimatur of the Plan, including this proposed Draft EIR. Therefore the extent of the controversies disclosed by the proposed Draft EIR, could be said to include lobbying interests intersecting with the City, various sister governmental entities along the overlying jurisdictions controlling that certain area of real estate within the City of Los Angeles designated within City Planning's file going forward as the above-referenced matter.

This Commenter requests more time to investigate the the South East Los Angeles Community Plan and its proposed role in proposed Draft EIR. Otherwise, will City Planning be signing off on issues of accountability and put the public welfare entrusted to it and its sister governmental agencies into the hands of commerce and subject to their extensive liabilities for the public welfare?

E46-5

<u>Developer's Requests for Concessions</u>

In the Draft Environmental Impact Report, III Project Description, Page III-6 (page 40, top in pdf), the developer is requesting a laundry list of concessions from a panoply of governmental agencies.

"Other permits, ministerial or discretionary, may be necessary in order to execute and implement the proposed project. Such approvals may include, but are not limited to: landscaping approvals, exterior approvals, permits for driveway curb cuts, storm water discharge permits, grading permits, installation and hookup approvals for public utilities and related permits."

Thus the developer admits the proposed Draft EIR insufficiently accounts for a huge portion of the actual execution of the project and is requesting a blank check to build on that certain real estate which is the subject of the City Planning file.

Currently the City Planning file contains developer requests for concessions from City Planning, City agencies and bureaus and from the City's sister governmental agencies like the Port of Los Angeles, the Alameda Corridor Special Authority, the Southern California Air Quality Management District, Cal-EPA/Department of Toxic Substance Control, California

Department of Resources, the Metropolitan Transit Authority, and others. These concessions, in the words of the proposed Draft EIR include: E46-5, Cntd

· 12' street widening on Long Beach Avenue
· 5' street widening on Martin Luther King, Jr. Blvd.
· 24.5' street widening on South Alameda Street
· 22' street widening on 41st Street
I. Introduction/Summary, Page I-5

The approximate area of these street concessions totals an unknown amount of land, land which now controlled by the City, the Department of Transportation, the MTA, rail agencies. Is the developer going to be accountable for events on these streets to the extent the as the City or will the people of Los Angeles suffer from decreased accountability as a result of the City granting the developer these street concessions?

The developer is also requesting concessions in the proposed Draft EIR,III Project Description, Page III-5 on page 39. E46-6

"D. DISCRETIONARY ACTIONS In order to allow development of the proposed project, the following discretionary approvals are required:

Approval of Parcel Map No. AA-2012-919-PMLA to permit the subdivision of one 546,921 net square-foot parcel into four lots.

Site Plan Review to develop more than 50,000 square feet of non-residential floor area. Merger of the right-of-way of 40th Place and the two alleys north and south of 40th Place"

If approved by City Planning, Approval of Parcel Map No. AA-2012-919-PMLA, is a concession to the developer which the developer must offset by mitigation or else the public purse is at a loss for the net tax revenues which the current lot line configuration is assessed for.

A Site Plan Review to develop new construction for this proposed project is much more than 50,000 square feet, it's almost 10 times that amount, according to the proposed Draft EIR, the Site Plan Review must cover approximately 464,000 square feet. Approval of a single site plan by City Planning must provide accountability by the developer which is presently under the jurisdiction of the City and various sister governmental agencies, or the public interest will lose the oversight and control arising from those mandates and authority. E46-7

Other agencies that may have jurisdiction over some aspects the proposed project include, but are not limited to: E46-8

California Department of Transportation
Department of Toxic Substances Control
Regional Water Quality Board
South Coast Air Quality Management District

Does the concessions the developer is asking for from the City and various sister governmental entities overturn a consensus mandate to address airborne particle emissions along the entire Alameda Corridor? Does the record show that a succession of planning and

regulatory entities generally regarded as relevant have stated greenbelts, water features, pedestrian-friendly amenities along the 5 designated California impacted port areas, which includes Alameda Corridor, along a section wherein lies that certain real estate which is the subject of City Planning's file? This information is needed to complete my public comments on the subject. E46-8

Developer is stating he will build 368 parking spaces, but I did not find anything in the proposed Draft EIR which shows necessary accommodations for at least 368 employees. In facilities the size developer is proposing, developer would have to provide eating facilities for at least 100 people who work there. I found no mention that these or any other such accommodations were planned to be provided, as required the law. E46-9

CALIFORNIA DEPARTMENT OF TRANSPORTATION

According to the July 14, 2014 letter from Dianna Watson, IGR/CEQA Branch Chief, Cal-DOT, District 7, Transportation Planning, found on page 11 of 543, Volume II, Appendix II of the proposed Draft EIR, "The project will create a net total of approximately 2,052 new two-way passenger car equivalent trips per day...However, trip generation needs to include employee trips...Based on the traffic data received, when the related projects are built, there may be be significant cumulative traffic impact to the State facilities" (i.e.,the 10 freeway). Thus, the developer is requesting a concession from another sister agency to the City that the public purse bear more than 4,104 additional car trips will be made each day as a result of the new construction in proposed Draft EIR. If the developer actually builds this project, additional mitigation must be included for significant traffic impacts which affect the daily lives of people. I propose using block grants to fund greenbelts, additional landscaping and pedestrian-friendly amenities be added to the project as part of the cost of adding to the traffic woes already existing. E46-10

California Public Utilities Commission

Chi Cheung To, P.E., Utilities Engineer, Rail Crossings Engineering Section ("RCES"), of the PUBLIC UTILITIES COMMISSION, reviewed the Notice of Preparation of Draft EIR ("NOP") regarding City Planning's file. In his June 19, 2014 to Ms. Hewawitharana of City Planning, Mr. To states California Public Utilities Commission (Commission) has jurisdiction over the safety of highway rail crossings (crossings) in California. The California Public Utilities Code requires Commission approval for the construction or alteration of crossings and grants the Commission exclusive power on the design, alteration, and closure of crossings. According to Mr. To, the project includes construction of four (4) industrial buildings. E46-11

"The 41stStreet at-grade crossing (ID: CPUC No. 001BBH-486.13, DOT No. 747835D) and the 38th place crossing (ID: CPUC No. 001BG-486.00, DOT No. 747607R) are located immediately on the west and east sides of the project site respectively. Currently, there are over 100 combined light-rail and freight train movements per day at the 41st Street crossing, with a maximum speed of 30 miles per hour. Any development adjacent to or near the railroad right-of-way (ROW) should be planned with the safety of the rail corridor in mind."

The proposed Draft EIR offers a commitment to a local hire agreement and a cash pledge to local recreation facilities, but the developer makes no offer, and has no means to indemnify the public regarding Mr. To's concerns stated on page13 of 543 of Volume II, Appendix II of

E46-11, Cntd

the proposed Draft EIR, the safe operation of the adjacent railway lines.

Mr. To correctly points out that new developments will increase traffic volumes not only on streets and at intersections, but also at any adjacent at-grade rail crossing. "Any traffic impact studies undertaken should address rail crossing safety analysis and **associated proposed mitigation measures** [emphasis added]. Safety analysis should include queuing on tracks, pedestrian movements, turning movements and sightlines. Safety improvement measures may include the planning for grade separations for major thoroughfares [of which there are several], improvements to existing at-grade rail crossings due to increase in traffic volumes (e.g., addition or upgrade of crossing warning devices, active and passive signs, tactile surfaces and edge lines on sidewalks, and channelization fencing)."

The proposed Draft EIR contains none of the elements called for by Mr. To, and developer will avoid accountability for the PUC's responsibilities if City Planning approves the project without providing answers to all of Mr. To's concerns.

Mr. To further notes, "any modification to an existing public rail crossing requires authorization from the Commission. RCES representatives are available for consultation on any potential safety impacts or concerns at crossings. Please continue to keep RCES informed of the project's development.

My question is whether City Planning or the developer have the resources or political will necessary to keep RCES involved in railway crossing safety mitigation throughout City Planning's process. Indications within the proposed Draft EIR is that no resources exist to support railway crossing safety mitigation measures as RCES is not even included in Section VII, Acronyms and Abbreviations despite representing critical public safety accountability adjacent to that certain real estate which is the subject of City Planning's file in this matter.

Wastewater Engineering Services, Bureau of Sanitation, City of Los Angeles

E46-12

According to Ali Poosti, Division Manager, Wastewater Engineering Services Division, Bureau of Sanitation, City of Los Angeles, in his June 14, 2014 memo to Ms. Hewawitharana of City Planning (pages 14-16 of 543, Volume II, Appendix II of the proposed Draft EIR):

"The estimated flow that would be generated from your proposed project exceeds 20,000 GPD [gallons per day]and therefore may have a **significant impact** on the sewer system capacity [emphasis added]. Thus, detailed gauging is necessary to determine whether the sewer system is capable of safely accommodating the total flow for your proposed project. We have initiated a work order to gauge the designated critical locations in the project area. This process usually takes approximately three (3) to four (4) weeks. A detailed evaluation and response will be provided to you within one (1) to two (2) weeks upon receipt of gauging data."

Mr. Poosti provided the following data to support his understanding:

"Projected Wastewater Discharges for the Proposed Project:

Type Description	Average Daily Flow per Type	Proposed No. of Units	Average Daily Flow(GPD)
Proposed Warehouse	30 GPD/1000 SQ.FT	376,361 SQ.FT	11,291

E46-12, Cntd

Office Space	170 GPD/1000 SQ.FT	85,181 SQ.FT 14,481
Manufacturing	50 GPD/1000 SQ.FT	29,896 SQ.FT 1,495

Total Daily Water Usage (gallons per day) 27,267"

"SEWER AVAILABILITY
The current approximate flow level (diD) and the design capacities at diD of 50% in the sewer system are as follows:

Sewer Diameter (in)	Pipe Location	50% Design Capacity
8 in.	Martin Luther King Jr. Blvd. *	198,599 GPD
10 in.	Martin Luther King Jr. Blvd. *	360,084 GPD
8 in.	40th Pl. *	229,323 GPD
8 in.	41 st St. *	229,323 GPD
10 in.	Long Beach Ave. East *	394,453 GPD
45 in.	41st Pl.	30 294,000 GPD
45 in.	41st Pl.	1427,000 GPD

* No gauging available"

"City of Los Angeles Bureau of Engineering has requested additional gauging to support the sizing and location of sewer connections, as a means of avoiding impacts to the public sewer system." As a result, all of the Alternatives proposed by City Planning would require the implementation of mitigation measure Utilities and Service Systems-1.

Mr. Poosti also demands stormwater mitigation is required of the proposed Draft EIR with the preferred uses being infiltration, capture/use, and biofiltration as the preferred stormwater control measures. Review of the proposed Draft EIR contains nothing to address Mr. Poosti's mandate for accountability of the developer for meeting water use policy standards.

Mr. Poosti's stormwater analysis reads:

"The Bureau of Sanitation, Watershed Protection Division (WPD) is charged with the task of ensuring the implementation of the Municipal Stormwater Permit requirements within the City of Los Angeles. We anticipate the following requirements would apply for this project."

"POST -CONSTRUCTION MITIGATION REQUIREMENTS
The project requires implementation of stormwater mitigation measures. These requirements are based on the Standard Urban Stormwater Mitigation Plan (SUSMP) and the recently adopted Low Impact Development (LID) requirements. The projects that are subject to SUSMP/LID are required to incorporate measures to mitigate the impact of stormwater runoff. The requirements are outlined in the guidance manual titled "Development Best Management Practices Handbook -Part B: Planning Activities". Current regulations prioritize infiltration, capture/use, and then biofiltration as the preferred stormwater control measures. The relevant documents can be found at: www.lastormwater.org. **It is advised that input regarding SUSMP requirements be received in the early phases of the project from WPD's plan-checking staff."** [emphasis added].

Has the developer been in touch with WPD regarding the SUSMP requirements? Will Mr. Poosti be kept in the loop with this project going forward? Has the developer made any commitments or cash pledges to protect and carefully utilize the public's water in the new

E46-12, Cntd

construction? It think not because the WPD is not even included in Section VII, Acronyms and Abbreviations despite representing critical public resource (water) accountability within and adjacent to that certain real estate which is the subject of City Planning's file in this matter.

Mr. Poosti also informed the developer about the City's construction standards:

"The project is required to implement stormwater control measures during its construction phase. All projects are subject to a set of minimum control measures to lessen the impact of stormwater pollution. In addition for projects that involve construction during the rainy season that is between October 1 and April 15, a Wet Weather Erosion Control Plan is required to be prepared."

"Also projects that disturb more than one-acre of land [this is an over 13-acre proposed Project] are subject to the California General Construction Stormwater Permit. As part of this requirement a Notice of Intent (NOI) needs to be filed with the State of California and a Storm Water Pollution Prevention Plan (SWPPP) needs to be prepared. The SWPPP must be maintained on-site during the duration of construction."

Has the developer made any commitment or cash pledge to be accountable for stormwater control measures during construction? Why don't any of the developer's project drawings or maps indicate any stormwater control measures?

Mr. Poosti provided photographs of the acceptable stormwater control measures necessary to mitigate water on the land (pages 24-29 of 543, Volume II, Appendix II of the proposed Draft EIR):

Bioswale A bioswale is a broad, shallow channel with a dense stand of vegetation covering the side slopes and bottom. Bioswales are designed to treat stormwater primarily through filtration, and plant uptake before conveying the flow to a downstream discharge location. The vegetation helps in reducing flow velocity to prevent erosion. Can be planted with either grass or native vegetation, bioswales are best served in residential, industrial, and commercial landuse with smaller tributary drainage areas. Storm Water Solutions | Storm Water & Erosion Control



Planter Boxes Planter boxes provide stormwater treatment through filtration and adsorption. Stormwater is captured and treated via filtration through the soil media and root zone and evapotranspiration through the planted vegetation before discharging back to storm drain system.

E46-12, Cntd

Infiltration Trench An infiltration trench is a long, narrow, rock-filled trench bordered on each side by a grass or vegetated buffer. Runoff is stored in the void space between the stones and infiltrates through the bottom into the soil matrix. The buffer strips provide pretreatment to limit the amounts of coarse sediments entering the trench which can cause clogging.

Bioretention/Infiltration Curb Inlets They provide stormwater treatment as well as peak flow attenuation through storage and filtration/infiltration, and adsorption. Stormwater is captured and treated via filtration/infiltration through the soil media and evapotranspiration through the planted vegetation.

Biotreatment Curb Inlet Biotreatment curb inlets are well suited for the urban environment. They add green space while providing stormwater runoff treatment. Unlike end-of-line treatment systems, it treats smaller drainage areas closer to the source of pollutants. This BMP can be used in retrofit project using existing catch basins and provides a natural approach to address high levels of fecal coliform and enterococcus bacteria, as well as other pollutants found in stormwater.

Curb Extension Curb extensions have historically been used to slow traffic and improve pedestrian safety. A landscaped curb extension version are now being increasingly used to treat stormwater runoff and provide green space. Essentially similar to rain gardens, they treat stormwater through filtration, infiltration, and evapotranspiration.

Pervious Concrete Pavement Pervious concrete is an open void material designed to allow rainwater to filter through the paved surface into the ground or a storage container rather than settling on the surface. It's two main objectives are runoff peak flow attenuation while provide stormwater treatment. Site specific design of the retention/recharge area include an initial soils site survey, and site specific storm water calculations for volume and duration.

Porous Concrete Pavers Similar to the porous concrete pavement, unit pavers provide a hardscape alternative to stormwater treatment BMPs. Unit pavers, or paving stones, are impermeable blocks made of brick, stone, or concrete, set on a prepared sand base. The joints between the blocks are filled with sand or stone dust to allow water to percolate downward.

Grass Pavers Similar in concept and function to the porous concrete pavements and unit pavers, the grass pavers are "landscaped" alternatives designed to allow infiltration of stormwater runoff to the underlaying soil media. Grass pavers, or turf blocks, are a type of open-cell unit paver whereby the cells are filled with soil and planted with turf. The cell matrix are typically made of concrete or synthetic material.

Recycled Rubber Sidewalk Originally used as alternatives to cracked sidewalks from protruding tree roots, rubber sidewalks are considered as another form of porous pavers to infiltrate runoff. Typically made of recycled rubber from waste tires.

Because there is no mention of stormwater control designs anywhere in the proposed Draft EIR, it appears the developer has not been in touch with Mr. Poosti about integrating the public's right to accountability into the proposed Project. City Planning

E46-12, Cntd

should not use the proposed Draft EIR as instrument to help the developer evade accountability for the public interest in stormwater control without overtaxing existing storm control infrastructure with this high-density, zero-design consideration project.

Finally, Mr. Poosti states the proposed Draft EIR must adhere to the City's solid waste policies. "The City has a standard requirement that applies to all proposed residential developments of four or more units or where the addition of floor areas is 25 percent or more, and all other development projects where the addition of floor area is 30 percent or more. Such developments must set aside a recycling area or room for onside recycling activities."

In a search of the 194-page proposed Draft EIR I found no use of the words "recycle" or "recycling". As such, the developer has no credibility with respect to plans to adhere to the City's solid waste policies, and City Planning should not this fact in it's file concerning that certain real estate which is the subject matter of the proposed Draft EIR.

Mr. Poosti, the Division Manager, Wastewater Engineering Services Division, Bureau of Sanitation, City of Los Angeles, submits unchanged figures regarding planned water usage and sewage capacity in his July 24, 2014 memo to Ms. Hewawitharana of City Planning (pages 20-21 of 543, Volume II, Appendix II of the proposed Draft EIR):

E46-13

Los Angeles County Metropolitan Transportation Authority ("LACMTA")

Marie Sullivan, Development Review Coordinator, Countywide Planning for the Los Angeles County Metropolitan Transportation Authority ("LACMTA"), wrote of the ATM's mandate to protect public transit infrastructure from developer's encroachments in her letter to to Ms. Hewawitharana of City Planning of June 26, 2014. (pages 30-51 of 543, Volume II, Appendix II of the proposed Draft EIR, with the following enclosures: Guidelines for Congestion Management Analysis, Noise Easement Deed/Acknowledgment/Certificate of Acceptance, Adjacent Construction Design Manual):

Ms. Sullivan is under the impression the Project provides 75 parking spaces. This is incorrect, the NOP and throughout the City Planning file, developer is seeking 368 parking spaces for the entire proposed Project. Ms. Sullivan also acknowledges the developer is seeking "merger of the right-of-way at 4051 South Alameda Street in the City of Los Angeles."

LACMTA, through Ms. Sullivan, has communicated to City Planning their "recommendations from LACMTA concerning issues that are germane to our agency's responsibility in relation to our facilities and services that may be affected by the proposed Project"

LACMTA states "The development of this property may increase traffic values cross this at-grade crossing and could potentially impact the safety of the crossing. These traffic and safety impacts should be analyzed." Thus LACMTA joins California Department of Transportation and the PUC as sister governmental agencies acknowledging the detrimental traffic impacts of the proposed Project. Developer

E46-13, Cntd

mitigation is necessary to offset these impacts and ensure these sister agencies are free to enforce accountability against the developer for safety and traffic hazards created by the proposed Project.

The developer has a duty under "Zoning Information No. 1117, **prior to the City issuing a building permit**, of the Metro Rail construction area, clearance shall be obtained from LACMTA. LACMTA will need to review engineering drawings and calculations." . . . "LACMTA requires an Engineering Review Fee for evaluation of any impacts based on adjacency and relationship of the proposed building to the Metro existing structures." [emphasis added].
Because the Long Beach Boulevard right-of-way is less than 100 feet from the edge of the sidewalk vacation sought by the developer, City Planning thus also has a duty under Zoning Information No. 1117, to withhold the developer's building permit up to and until the developer has obtained sufficient clearance from LACMTA. Further, City Planning should not grant any concession or fee waiver to offset developer's duty to pay the LACMTA Engineering Review Fee or LACMTA cost reimbursements as that would be irresponsible use of public funds and motivate developer to evade accountability with unsubstantiated Engineering projections and pointless delays.

Finally, Ms. Sullivan informs City Planning that developer has a large burden to conform the project to the Congestion Management Program statute, and enclosed the relevant statutory language. It appears that the proposed Draft EIR listed subject headings for traffic analysis, but which I cannot locate using the citations provided by City Planning:

Appendix IV: IV.B-10 Proposed Project Traffic Conditions for 2016 ..... IV.B-20
IV.G-2 2014 Existing Traffic Conditions IV.G-7
IV.G-3 Freeway Segment Analysis..... IV.G-8
IV.G-4 Freeway Off-Ramp Analysis IV.G-8
IV.G-5 Level of Service Descriptions..... IV.G-11
IV.G-6 Level of Service Criteria IV.G-12
IV.G-7 Proposed Project Traffic Conditions for 2016 ..... IV.G-14

If these pages from the proposed Draft EIR were indexed but omitted from City Planning's file additional time must be granted to allow for production of these documents, their review and public comment. Anything less results in City Planning facilitating developer's evasion of accountability on a critical issue entitled to significant mitigation: The creation of new hazards to public safety caused by additional traffic flooding public transportation access nodes, schools, shops and recreation areas arising from the foreseeable ingress and egress from the proposed Project and the real property concessions sought by the developer.

It is known currently that block grants are available through City Planning which include monies for mitigation which satisfies the consensus mandate to address particle emissions. The measure of concessions to the developer should be weighed against the dollar value in block grants available to City Planning concerning that certain real estate in the City of Los Angeles which is the subject of City Planning's file at issue in these comments. This is a way which provides for further execution of the City's living wage ordinance to include new jobs along the Alameda Corridor. If

the developer were open to utilization of the land for green-waste processing, green-collar, living wage jobs would be created processing green waste, the City would reduce trash hauling costs (for the last 15 years the single largest cost in the City's budget), existing airborne emissions would be offset by the carbon provided by the green waste itself, and an opportunity for the community to re-introduce thriving vegetation onto the otherwise fully built environment in and around that certain real estate which is the subject of City Planning's file at issue in these comments. More time is necessary to develop an analysis which shows an offset, matching up the jobs described in the proposed Draft EIR requiring 368 parking spaces, with the creation of living-wage, green collar jobs which are uniquely possible within that certain real estate which is the subject of City Planning's file at issue i these comments.

E46-13, Cntd

I am of those whose say that certain real estate which is the subject of City Planning's file is an opportunity for the City to address social, political and environmental impacts in District 9, and improve the livability in an area which has been a targeted sacrifice zone which has existed since 1994.

E46-14

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LETTER E47

From: Srimal Hewawitharana
To: Eric Charlton
Subject: Fwd: ENV-2012-920-EIR Request for Additional Time For Comments
Date: Monday, March 09, 2015 8:37:32 AM

---------- Forwarded message ----------
From: **Jack Neff** <jackneff01@yahoo.com>
Date: Sat, Mar 7, 2015 at 6:36 PM
Subject: ENV-2012-920-EIR Request for Additional Time For Comments
To: "srimal.hewawitharana@lacity.org" <srimal.hewawitharana@lacity.org>

Ms. Hewawitharana -This message is to request you to please graciously grant additional time for submission of public comments for the above-referenced Draft EIR, because the City's January 22, 2015 Notice only provided for a 43-day public comment period from Jan. 20-March 9, 2015, with an additional 5 days for mailing of the City's Notice. I do not know whether that could be judged a legally sufficient amount of time for public comments, and even if it is, it is an impractical amount of time because of the scope, size, volume and cost of the proposed project known as 4051 South Alameda Project, ENV-2012-920-EIR. E47-1

The Draft EIR includes a 12-page Summary of Draft EIR, a 194-page Draft EIR and an appendix of over 2,400 pages, purporting to cover a proposed project of over 13 acres, with approximately a half-million square feet of new construction in a mixed-use, residential/industrial neighborhood. There is not enough time to address the large number of issues which may or may not be adequately addressed therein, including the developer's requests for variances, set-asides, set-backs, building design, traffic, parking, flow-through, water, remediation, seismic concerns, archeological elements, easements, vacations, fast-track permitting between overlapping jurisdictions, airborne emissions, existing environmental conditions, sensitive receptors among residents, current impacts, insurance, working conditions, pay rates and project authority. Even with all this paperwork, a cursory review of the Draft EIR and Appendices show there are huge gaps in the developer's Draft EIR and the readily apparent issues affecting this proposed project, and more time is necessary to adequately ask the questions necessary to establish a chain of responsibility for the proposed project. E47-2

Please respond at your first opportunity because the putative deadline for public comments is this Monday, March 9, 2015. I will nevertheless be necessarily submitting truncated comments prior to that time, with plans to submit additional, supplemental comments if and when you acknowledge the need for additional time for submission public comments on this enormous project and its largely-unknown Draft EIR. E47-3

Thank you very much.

Jack Neff
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(310) 612-2279

LETTER E48

Ernesto Nevarez
52041 Panorama Dr.
Morongo Valley, CA 92256
portofaztlan@yahoo.com

4051 South Alameda Street Project
Case Number: ENV-2012-920-EIR, AA-2012-919-PMLA, DIR-2013-887-SPR
State Clearinghouse Number: 2014061030

Submitted via email to: srimal.hewawitharana@lacity.org Attn: Srimal Hewawitharana

(Note: Please be sure to include my public comment for the record. My previous comment submitted could not be found in the records and I would hate to suspect that it was done intentionally.) E48-1

Trucks

The term "trucks" are referred to in a very ambiguous manner and are not defined as to their character. The only information supplied is that 31 of the 342 trucks would be diesel. All trucks used for commercial transportation are diesel trucks with the exception of those fueled by LNG which account for as little as 2% of those used in the harbor. What will the other 311 trucks use as fuel? Again, heavy duty commercial trucks do not use gasoline!!!! The *ITE Manual* estimates that this size warehouse will generate 342 daily truck trips and it didn't mean Ford Rangers or Toyota Tundras but class 8 tractors with gvwr of 80,000 pounds. Claiming that it will operate using 10% of the big rig traffic as used by competitors of similar size is ridiculous. E48-2

The study states that "The empirical data for the applicant's existing operations demonstrates that this is feasible, as the applicant is currently operating at less than 50 truck trips per day." Being "feasible" in the past by the applicant is not the same as being the practice in the future. Is it the intent of the applicant to develop the project and then operate the facility or will it rent it out or have a third party logistics firm (3PL) manage the operation? Will it use its' own fleet of trucks or will it utilize a motor carrier?

The Draft EIR provides for an alternative allowing for only 75 trucks a day, *Alternative C*. This option is unrealistic due to the competitive nature of the industry and as asserted in the ITE Manual. Below are numbers that I have calculated and which support the ITE estimate of 342 truck trips.

4 warehouse structures each approximately 100,000 square feet with high ceilings.
Less than 20 truck trips for each structure daily.
An intermodal container is 8 ft wide and 40 ft long, 320 square feet

This amounts to 6400 square feet of deliveries daily.
Warehouses stack cargo twice as high as that carried in containers creating the equivalent of 200,000 sq ft.
Based on these numbers cargo will sit at the warehouse for approximately 40 days!!!!
The 75 trucks per day is unrealistic due to the ***Just-in-Time*** (JIT) competitive nature of the industry and as asserted in the ITE Manual.

E48-2, Cntd

The 342 daily trips estimated using the *ITE Manual* is a lot more realistic! The competitive nature of the industry will not allow for a warehouse to survive by operation at 20% of capacity using the 75 trucks.

Parking, Staging, and Queuing

E48-3

The project will provide a total of 349 spaces on-site of which 245 spaces will be standardstalls (8'-4" x 18'), 96 spaces will be compact stalls ((7'-6" x 15') and 8 spaces will be accessible stalls for vans (17' x 19').

Where will the tractor/trailers park? A combined 70 feed long when adding 15 ft for the power unit.. Where will the 40 foot containers and 53 foot trailers be parked/stored? How much maneuvering space will be provided for backing up a trailer? The driver has to target a goal post not at the dock but at the front of the two adjoining units that he is trying to park between. This requires at minimum a distance of the adjoining 53 foot trailer parked at a dock plus an additional 70 feet for the tractor and trailer that is attempting to back up to the dock. (The tractor adds an additional 15 feet to the length) A total of 120 feet of unobstructed space is needed.

If these are "live" unloads or transloads the truck will always be connected to the trailer or container. If it is not a "live" unload then it will be drop. In such cases as soon as the container or trailer is unloaded then it is moved immediately by a yard goat (utr) to a holding area to free up the dock for the next load. Where will these units be stored???

The project does not provide for a queuing lane. Trucks must report to an entry clerk and when multiple trucks arrive at once or one has problems with the paperwork a line develops. If there is no queuing lane provided by the facility the line will use the public street. Based on the figure of 342 truck trips a day in a 10 hour work day it means about 30 trucks an hour or one every two minutes. As explained earlier there will be only one entry gate for trucks due to the cost of entry clerks and bonded cargo rules. A paperwork delay at the gate of 10 minutes will mean a backup in the street of 5 units which means 350 feet of standing trucks!

Due to the lack of a staging area and queuing lane the company will not be able to enforce a 5 minute idling rule to cut down on emissions. The trucks will be off company property.

Traffic

The City of Los Angeles is prohibited from setting routes in interstate commerce. E48-4

> The LOS and V/C ratios for the study intersections with related proposed project traffic and under proposed project conditions for 2016 are summarized in Table IV.G-7, *Proposed Project Traffic Conditions for 2016*. The results indicate that all the study intersections will continue to operate at a LOS D or better (i.e., within the range of acceptable thresholds of LOS A through D) during a.m. and p.m. peak hours. It should be noted that with the assumption of 351 daily truck trips for the project, the study intersections, except the intersection of Alameda Street and Washington Boulevard, will show no significant impacts due to project traffic. However, in order to avoid significant impacts at the intersection of Alameda Street and Washington Boulevard, mitigation measures are required.

The study did not take into consideration the impact of 351 commercial heavy duty trucks but in their place took into consideration the impact of 702 passenger cars (based on the 2 cars for each truck factor). There is no comparison. The turning radius of a 70 foot-long big rig combo weighing 80,000 pounds cannot be compared to a two compact cars.

Warehouses are very secured especially if they are bonded warehouses. All warehouses have a clerk at an in-gate checking the delivery order/pick up order and exit paperwork. This is a requirement for bonded facilities and more than likely this will be a bonded facility. Which of the eight entrances will be the one for trucks with an in-gate clerk? It is very doubtful that it will have 8 entrances with 8 clerks! The lack of a queuing lane or staging area is a nightmare in the making.

Hazmat and HOS

Commercial trucks run on either diesel or LNG. Will LNG be stored at the facility? Will hazardous materials be transported to or from the facility? State law prohibits the parking of trucks carrying hazmat on public streets. Where on the facilities will there be a secured monitored yard with a hazmat response? E48-5

The FMCSA regulates the Hours of Service of drivers and requires a rest period of 10 hours between driving shifts. This facility is destined to be a regional distribution center which means that it will have trucks arriving for a load after having driven all day from somewhere else and will be required to take a 10 hour break. There are NO truck stops in the area and the facility does not provide for a holding yard. Worst of all most of the streets in the immediate are do not allow parking. The trucks will be parked in the adjacent area where ever they can, some with hazmat cargo. This includes parking near schools, churches, and residences outside of the immediate area.

The information provided for the project is ambiguous, incomplete, and erroneous so please do not approve it. E48-6

March 9, 2015

From:	Srimal Hewawitharana
To:	Eric Charlton
Subject:	Fwd: 4051 South Alameda Street Project public comment submission
Date:	Monday, March 09, 2015 2:17:58 PM
Attachments:	The Farm.pdf Submission.pdf

---------- Forwarded message ----------
From: **Ernesto Nevarez** <portofaztlan@yahoo.com>
Date: Mon, Mar 9, 2015 at 1:37 PM
Subject: 4051 South Alameda Street Project public comment submission
To: "srimal.hewawitharana@lacity.org" <srimal.hewawitharana@lacity.org>
Cc: "scf_enviro_action-noreply@yahoogroups.com" <scf_enviro_action-noreply@yahoogroups.com>, Port of Aztlan <portofaztlan@yahoogroups.com>

Dear Srimal Hewawitharana
Environmental Specialist II
Los Angeles City Planning Department
EIR Analysis Section
Department of City Planning

Please make sure that this is included in the public record. Last time I sent something it doesn't show up. I did a control-F for my name and couldn't find my submission. I'm sending a "cc" of this transmission to the SCF for documentation that I did send it so please don't overlook including it. An unsigned PDF copy "submission" is also being included because the font resolution is better quality. E49-1

Thank you,

LETTER E50

RECEIVED
CITY OF LOS ANGELES
MAR 23 2015
ENVIRONMENTAL UNIT

Hola Soy Senorina Nieva
trabajo en la Compania Impact.
tengo 25 años en California.
en la Compania 5 años
Estoy Contenta trabajado en
la Compania.
Estoy agradecida por el
trabajo y doy gracias
por emplearme y portenerme
Como empleada gracias
tenemos un buen patron
EXlente

E50-1

LETTER E51

3-13-15

5416 Long Beach AVe #152 LA. CA 90058

Yo ERika Perez Les INForMo que Yo etrabajado
Con el Señor TONY. YUU Por 3 AÑOS
Y en estos AÑOS no tengo ningun Problemma
el es onesto con todos Sus empleados
Y el ACe Lo inPosible de Mantenernos
Con trabaJo Para que no nos Falte
Y no tengo que Ablar de el PorQue
es MuX bueno con nosotros Y Yo estoY
MuY FeliZ AQui Y Sitienen Preguntas
Me Pueden Marcar

E51-1

ATTe: ERika Perez

Tel: (323) 245-3050

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CITY OF LOS ANGELES
APR 03 2015
ENVIRONMENTAL
UNIT

LETTER E52

From: Srimal Hewawitharana
To: Eric Charlton
Subject: Fwd: Comments on the Draft EIR, Case NO. ENV-2012-919-PMLA, DIR-O203-887-SPR, State Clearinghouse Number 2014061030
Date: Monday, March 09, 2015 12:17:10 PM

---------- Forwarded message ----------
From: **Linda Piera-Avila** <lindap_a@verizon.net>
Date: Mon, Mar 9, 2015 at 11:28 AM
Subject: Comments on the Draft EIR, Case NO. ENV-2012-919-PMLA, DIR-O203-887-SPR, State Clearinghouse Number 2014061030
To: "srimal.hewawitharana@lacity.org" <srimal.hewawitharana@lacity.org>

Srimal Hewawitharana ,Environmental Specialist II
Los Angeles City Planning Department
EIR Analysis Section
200 N. Spring Street, Room 750
Los Angeles, CA 90012
Srimal.hewawitharana@lacity.org

Re: Comments on the Draft EIR, Case NO. ENV-2012-919-PMLA, DIR-O203-887-SPR, State Clearinghouse Number 2014061030.

Dear Ms. Hewawitharana:

Please do not accept the Draft EIR in its current form. It goes against the Open Space element in the City's master plan by opting against preservation and restoration of green open space in favor of more industrial uses. E52-1

The highest use of this parcel would be to return it to the community as an urban garden with recreational opportunities. Additionally, the cumulative impacts of more diesel truck trips required for the warehouse activity will only add to the area's already unacceptable level of air and noise pollution and decrease pedestrian and automobile safety by increasing traffic congestion adjacent to a residential area and the Metro Blue Line. E52-2

The DEIR's conclusion that community gardens do not carry local community value and economic benefits is insensitive to communities of color. For the people of South LA, access to healthy food – broccoli, asparagus, tomatoes (as opposed to chips, sodas, and candy), as well as skills to produce this food – are matters of life and death, of sight and blindness. In essence, the DEIR's conclusion negating community value of organic gardens sends a Marie Antoinette message – not let them eat cake, but let them feast on salt, sugar, and fat while other more fortunate areas of Los Angeles enjoy the privilege of eating healthy food and living robust lives. E52-3

I was equally appalled to read that the DEIR fails to recognize the community value in using the land for recreational purposes. Are we to believe there is a positive net gain in setting aside the land for polluting industrial use, for possible release of carcinogens and other toxins, rather than giving the children of Los Angeles a place to play and run and get in shape? This is a shameful conclusion, truly embarrassing to read. E52-4

Please re-do this DEIR to take into consideration the abundant community values in using this land for gardening and recreation. E52-5

Thank you for your public service.

Sincerely,

Linda Piera-Avila

1424 12th St. Apt. E

Santa Monica, Calif. 90401

Mi nombre es eFrain pinon

RECEIVED
CITY OF LOS ANGELES
APR 03 2015
ENVIRONMENTAL UNIT

tengo 25 años viviendo en los Angele Co—
me he desempeñado Como trabajador de maquina—
he trabajado para diferentes Compañias—
tengo trabajando para "impact" mas de 4 años
y no me puedo quejar siempre ha habido trabajo
incluso el dueño de la Compañia tiene mucho
acercamiento con los empleados.

De mi parte estoy agradecido con la compañia
por jenerar empleo.

Atte. Efrain Pinon.

E53-1

LETTER E54

From:	Srimal Hewawitharana
To:	Eric Charlton
Subject:	Fwd: Comments on the Draft EIR, Case NO. ENV-2012-919-PMLA, DIR-O203-887-SPR, State Clearinghouse Number 2014061030
Date:	Monday, March 09, 2015 2:34:38 PM

---------- Forwarded message ----------
From: **John Quigley** <spectralq@aol.com>
Date: Mon, Mar 9, 2015 at 2:26 PM
Subject: Comments on the Draft EIR, Case NO. ENV-2012-919-PMLA, DIR-O203-887-SPR, State Clearinghouse Number 2014061030
To: srimal.hewawitharana@lacity.org

Srimal Hewawitharana ,Environmental Specialist II
Los Angeles City Planning Department
EIR Analysis Section
200 N. Spring Street, Room 750
Los Angeles, CA 90012
Srimal.hewawitharana@lacity.org

Re: Comments on the Draft EIR, Case NO. ENV-2012-919-PMLA, DIR-O203-887-SPR, State Clearinghouse Number 2014061030.

Dear Ms. Hewawitharana:

Please reject the Draft EIR in its current form. It runs counter to the Open Space element in the City's master plan by opting against preservation and restoration of green open space in favor of more industrial uses. The highest use of this parcel would be to return it to the community as an urban garden with recreational opportunities. Additionally, the cumulative impacts of more diesel truck trips required for the warehouse activity will only add to the area's already unacceptable level of air and noise pollution and decrease pedestrian and automobile safety by increasing traffic congestion adjacent to a residential area and the Metro Blue Line. E54-1 E54-2

The DEIR's conclusion that community gardens do not carry local community value and economic benefits is insensitive to communities of color. For the people of South LA, access to healthy food – broccoli, asparagus, tomatoes (as opposed to chips, sodas, and candy), as well as skills to produce this food -- are matters of life and death, of sight and blindness. In essence, the DEIR's conclusion negating community value of organic gardens sends a Marie Antoinette message – not let them eat cake, but let them feast on salt, sugar, and fat while other more fortunate areas of Los Angeles enjoy the privilege of eating healthy food and living robust lives. E54-3

I was equally appalled to read that the DEIR fails to recognize the community value in using the land for recreational purposes. Are we to believe there is a positive net gain in setting aside the land for polluting E54-4

industrial use, for possible release of carcinogens and other toxins, rather than giving the children of Los Angeles a place to play and run and get in shape? This is a shameful conclusion, truly embarrassing to read. E54-4, Cntd

Please re-do this DEIR to take into consideration the abundant community values in using this land for gardening and recreation. E54-5

Thank you for your public service.

Sincerely,

John Quigley

2272 Colorado Blvd #1349

Eagle Rock, CA 90041

Hi my name is William Ramirez,

I live on Bixel Street of Los Angeles. I have lived in Los Angeles since 2001. I've been working at Poetry since May 2009. I am currently in the shipping department. With this job, I have been able to support my family. It has helped me become a better member of my family.

Working at Poetry has been a great experience. Poetry's working environment is professional and very great. I look forward to working with my co-workers every day. We get through the good times and bad times together, while always looking to help each other towards success. The product that our company sells brings happiness to many people around the world. By providing great merchandise, we give people opportunities for their business while providing people what they want. We help support, by giving jobs, not only here in Los Angeles, but also in China. I am happy to say Poetry is a great company. E55-1

Thank You.

Hola mi nombre es William Ramirez,

Yo vivo en la calle Bixel de Los Ángeles. He vivido en Los Angeles desde 2001. He estado trabajando en la compania de Poetry desde mayo de 2009. Actualmente estoy en el departamento de envios. Con este trabajo, he sido capaz de mantener a mi familia. Me ha ayudado a ser un mejor miembro de mi familia.

Trabajar en Poetry ha sido una gran experiencia. Entorno de trabajo de Poetry es profesional y muy grande. Espero con interés trabajar con mis compañeros de trabajo todos los días. Recibimos a través de los buenos y malos momentos juntos, pero siempre mirando para ayudarnos unos a otros hacia el éxito. El producto que nuestra empresa vende trae felicidad a muchas personas alrededor del mundo. Al proporcionar la mercancía, nos damos a la gente oportunidades para su negocio mientras que proporciona a la gente lo que ellos quieren. Ayudamos apoyo, dando puestos de trabajo, no sólo aquí en Los Ángeles, pero también en China. Estoy feliz de decir que la Poetry es una gran compañía.

Muchas gracias.

From: Srimal Hewawitharana
To: Eric Charlton
Subject: Fwd: 4051 Alameda
Date: Thursday, February 12, 2015 9:01:56 AM

---------- Forwarded message ----------
From: **rippost** <rippost@verizon.net>
Date: Thu, Feb 12, 2015 at 7:07 AM
Subject: 4051 Alameda
To: srimal.hewawitharana@lacity.org

I oppose development of 4051 Alameda for purposes of a so-called "industrial park." Better that it be a park, or used by urban farmers. L.A., especially south L.A., does not need this type of exploitation. E56-1

R.S. Rense

Los Angeles

LETTER E57

My name is Anahi Reyes,

I've been living in Broadway st Los Angeles for 3 years; I've worked for impact for 5 years I started off as a trimmer after a year patron (tony) gave me the opportunity to learn pre-production it was hard at the time but nothing is impossible. I learn so many things over the years. I appreciate my boss for helping me become something better in this life. This job has helped me a lot economic and so many other ways. I love my job we get to meet new people and work with big companies. I'm really happy to work with impact and experience new things. I feel really happy to see famous people wearing our products that we made here at impact. This job has helped me so much in helping my family in every way.

E57- 1

Public Counsel

THE PUBLIC INTEREST LAW OFFICE OF THE LOS ANGELES COUNTY AND BEVERLY HILLS BAR ASSOCIATIONS
The Southern California Affiliate of The Lawyers' Committee for Civil Rights Under Law

March 6, 2015

Srimal Hewawitharana
Environmental Specialist II
Los Angeles City Planning Department
EIR Analyst Section
Department of City Planning
200 N. Spring Street, Room 750
Los Angeles, CA 90012

Via Mail and Email

Re: Comments on the Draft EIR, Case No. ENV-2012-920-EIR, AA-2012-919-PMLA, DIR-02013-887-SPR, State Clearinghouse Number 2014061030

Dear Ms. Hewawitharana:

I am writing on behalf of Public Counsel to submit these comments on the Draft EIR conducted by the City of Los Angeles Planning Department for the 41st and Alameda proposed industrial park (hereafter "Proposed Industrial Park") in Council District 9.

Public Counsel is the largest not-for-profit law firm of its kind in the nation. Established in 1970, Public Counsel is dedicated to advancing equal justice under law by delivering free legal and social services to indigent and underrepresented children, adults and families throughout Los Angeles County. Last year, Public Counsel assisted more than 30,000 people with direct legal services and assisted hundreds of thousands more through filing impact lawsuits, influencing policy, and sponsoring legislation. E58-1

Public Counsel is concerned about the project currently being proposed to be built on this parcel for several reasons.

First, the development that is proposed to be built would not have a positive effect long term on the Los Angeles workforce. Other than a few short term construction jobs, once the project is built, there are not anticipated to be many new positions. The work that would result long term would simply be a continuation of the current manufacturers Poetry, Impact, Miss Me, and Active. (See pp. 253-256 of the Initial Study). These are typically low wage garment worker jobs in an industry well-known for its wage and hour violations. See, for example, this November 2014 news release from the U.S. Department of Labor, entitled "Workers face millions in unpaid wages in Southern California garment industry," last accessed on March 5, 2015 at http://www.dol.gov/opa/media/press/whd/WHD20142047.htm E58-2

Indeed, according to the California Department of Labor Standards Enforcement, since 2003, there have been a total of 15 wage claims filed against the manufacturers that make up the PIMA group: 2 against Poetry, 1 against Impact, 7 against Miss Me, and 5 against Active USA, Inc. The individual claims range from $4,500 to $63,600, and the violations alleged include failure to pay minimum wage and overtime. The vast majority resulted in settlements. Moreover, the Bureau of Field Enforcement has issued one citation each against Poetry, Impact, and Miss Me. E58-2, Cntd

We also echo the concerns of many other community groups that this development will not address the problem that the area in which this development is proposed is park poor. One UCLA study revealed that Council District 9 has the least park acreage per child of any district in Los Angeles. See http://www.environment.ucla.edu/reportcard/article1455.html. As others have expressed, there has been insufficient attention paid to the urban garden alternative that has so much support from the community. E58-3

Moreover, the pollution that would be generated by this project presents a major health hazard. This lot is only a few blocks away from Jefferson High School, and with residential housing on three sides, the pollution that would be generated from the diesel truck trips is a major public health concern. Los Angeles is rated first, third and fourth among the top 10 worst municipalities on air quality nationwide. See http://www.stateoftheair.org/2014/city-rankings/most-polluted-cities.html. E58-4

We urge the City of Los Angeles not to pave over the Historic South Central Farm with more garment manufacturers. There is so much potential on this parcel for green space, healthy foods, urban gardens, environmental education, and parks and recreation instead. Thank you for your consideration. E58-5

Sincerely,

Anne Richardson, Esq.
Associate Director, Opportunity Under law

Miriam Rodriguez

I live in South Central Los Angeles, I been working for Poetry Clothing for 6 years. I started working as a receptionist and now I'm a production coordinator, and plan to climb up to a designer. It's a very clean and safe environment. I'm really happy working for Poetry. The best part about this job is to see people wearing our merchandise.

E59-1

Soy Abel Ruiz

Tengo muchos años trabajando en Impact, siempre tengo trabajo. El patron-Tony es bueno con nosotros. E trabajado con el por mas de 20 años. El es muy agradable y humilde. Estoy con personas de caracter bueno. Estoy feliz de tener un trabjo con Tony. Vivo en Los Angeles cerca de mi trabajo, muy conveniente cavando me quedo extra tiempo, para no llegar muy tarde a la casa. Estoy muy agradecido con mi patron.

E60-1

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03-9-2015

LETTER E61

RECEIVED
CITY OF LOS ANGELES
APR 03 2015
ENVIRONMENTAL
UNIT

To whom it may concern,

I have worked for Tony for over 15 years. I have nothing but good things to say about him. He has been a great boss, and has taken good care of his employees. I have worked for Tony for so long not because there wasn't any other jobs, but because he provided the best job for me. I am satisfied working for Tony.

SAMUEL RUIZ

E61-1

LETTER E62

From: Srimal Hewawitharana
To: Eric Charlton
Subject: Fwd: CASE NO.: ENV-2012-920-EIR - Draft EIR for the 4051 South Alameda Street Project
Date: Monday, March 09, 2015 2:04:42 PM

---------- Forwarded message ----------
From: **Eugene E. Ruyle** <cuyleruyle@mac.com>
Date: Mon, Mar 9, 2015 at 12:33 PM
Subject: CASE NO.: ENV-2012-920-EIR - Draft EIR for the 4051 South Alameda Street Project
To: srimal.hewawitharana@lacity.org
Cc: "Eugene E. Ruyle" <cuyleruyle@mac.com>

Srimal Hewawitharana, Environmental Specialist II
Los Angeles City Planning Department EIR Analysis Section
Department of City Planning, 200 N. Spring Street, Room 750
Los Angeles, CA 90012
srimal.hewawitharana@lacity.org

RE: Draft EIR for the 4051 South Alameda Street Project
CASE NO.: ENV-2012-920-EIR, AA-2012-919-PMLA, DIR-2013-887 –SPR
STATE CLEARINGHOUSE NUMBER: 2014061030

Dear Srimal Hewawitharana,

I have reviewed the Draft EIR for the 4051 South Alameda Street Project and find it unacceptable. My understanding is that CEQA requires the EIR to be an objective analysis of the environmental impacts of the various alternatives to a proposed development. Instead, this is a highly biased document favoring the developer's pet project, with little consideration of the wishes and well being of the surrounding community. E62-1

The site is described as "an approximately 13-acre vacant lot with scattered weeds and grasses," "not designated as or suitable to be designated as" agricultural land, in spite of the fact that it was used for over a decade as an urban farm by largely immigrant families. Further, the Angeleno public has demonstrated its opposition to any other use. The two decades of community struggles to preserve the land for agricultural purposes are barely mentioned in this pro-development EIR. E62-2

The Draft EIR acknowledges that the "air quality in Southern California does not meet state and federal standards," and that the American Lung Association "consistently gives Los Angeles County failing grades in the amount of ozone and particulate pollution in the air." It further acknowledges that the proposed project, consisting of four industrial buildings totaling nearly 500,000 square feet, would "have the potential to result in significant impacts related to global climate change," but it nowhere compares the proposed project with the agricultural alternative favored by the community. Indeed, the community agricultural alternative proposed by public comment was rejected out of hand because it would not provide any industrial space! E62-3

The California Environmental Quality Act (CEQA) was passed in 1970 to institute a statewide policy of environmental protection and makes environmental protection a mandatory part of every California state and local agency's decision making process. The City of Los Angeles not only has the discretionary power to reject this project, it must exercise this power to protect the environment..

E62-4

If it approves this project, the City of Los Angeles will be telling the world that it does not care about global climate change or the environment, and that it does not care about immigrants or the concerns of Angelenos.

E62-5

Accordingly, I ask that the Draft EIR be re-written to give fair consideration to all alternatives and that the environmental impact of each alternative be fully and fairly assessed. I also ask that the City of Los Angeles listen to the voices of the people of Los Angeles and reject the proposed development, thereby preserving the land for agricultural purposes.

E62-6

Please keep me informed of any further documents or public hearings on this issue.

E62-7

Sincerely

Eugene E Ruyle
Emeritus Professor of Anthropology
California State University, Long Beach

LETTER E63

From: Srimal Hewawitharana
To: Eric Charlton
Subject: Fwd: Response to the Draft EIR for the 4051 South Alameda Street Project - CASE NO: ENV-2012-920-EIR
Date: Monday, March 09, 2015 2:15:47 PM

---------- Forwarded message ----------
From: **Eugene Ruyle** <Eugene.Ruyle@csulb.edu>
Date: Mon, Mar 9, 2015 at 1:28 PM
Subject: Response to the Draft EIR for the 4051 South Alameda Street Project - CASE NO: ENV-2012-920-EIR
To: "srimal.hewawitharana@lacity.org" <srimal.hewawitharana@lacity.org>
Cc: Eugene Ruyle <Eugene.Ruyle@csulb.edu>

March 9, 2015

Srimal Hewawitharana, Environmental Specialist II
Los Angeles City Planning Department EIR Analysis Section
Department of City Planning, 200 N. Spring Street, Room 750
Los Angeles, CA 90012
srimal.hewawitharana@lacity.org

RE: Response to the Draft EIR for the 4051 South Alameda Street Project
CASE NO: ENV-2012-920-EIR, AA-2012-919-PMLA, DIR-2013-887 –SPR
STATE CLEARINGHOUSE NUMBER: 2014061030

Dear Srimal Hewawitharana:

At its regularly scheduled meeting in Santa Cruz on March 8, 2015, the State Central Committee of the Peace and Freedom Party of California passed the following resolution in response to the Draft EIR for the 4015 South Alameda Street Project: E63-1

"We ask that the Draft EIR for the 4015 South Alameda Street Project be re-written to give fair consideration to all alternatives and that the City of Los Angeles listen to the voices of the people of Los Angeles and reject the proposed development, thereby preserving the land for agricultural purposes."

The Peace and Freedom Party is one of six ballot-qualified parties in the State of California, governed by the State Elections Code and its own Bylaws. Born from the civil rights and anti-war struggles of the 1960s, we are a working class party, committed to socialism, democracy, ecology, feminism, racial equality, and internationalism.

We further ask that you keep our Party informed of future revisions of the Draft EIR and any public hearings on this issue. E63-2

Sincerely

Gene Ruyle, Member
State Central Committee
Peace and Freedom Party of California
eruyle@csulb.edu

Marilyn Sanchez

I live in South Central Los Angeles, I been working for Poetry Clothing for 8 years. I started working as a receptionist and now I'm a production manager. It's a very clean and safe environment. I'm really happy working for Poetry. The best part about this job is to see people wearing our merchandise. I love that they are flexible with my schedule due to my daughter.

E64-1

LETTER E65

RECEIVED
CITY OF LOS ANGELES
MAR 23 2015
ENVIRONMENTAL UNIT

03/08/2015

To whom it may Consern.

I'm Fernando Santay. I've worked here at Impact factory for five months. I'm new in this factory. my Position is cover stich operator. I do all kind of work, style, and fashion. I also able to work with overlook, and single. As a cover stich operator, I have a lot of experience. I've worked on cover stich for about ten years. I like to work here, because the Impact factory is doing the better quality job that matches my experience. I plan to work here for a while, unless something comes up. I don't know everybody yet, but it seams I'm in the good spot. My wish for the boss and all the employess at the Impact factory to continue doing the best quality work on clothing fashion, and I'm looking forward to do my bery best here as cover stich operator. E65-1

Sincerely

Fernando Santay

Fernando Santay

03-13-15

LETTER E66

RECEIVED
CITY OF LOS ANGELES
APR 03 2015
ENVIRONMENTAL
UNIT

Mi nombre es Damian Serrano

yo estoy trabajando por 4 años

Para esta Compania y por el tiempo

que e estado en esta Compania

siempre me han tratado muy bien

gracias a esta Compania ne sacado

adelelante mi familia y espero que

esta Compania cresca mas para que

nos sigua dando trabajo por mucho

Tiempo para porder darle mi familia

lo mejor Gracias impact Company

Damian Serrano

E66-1

From:	Srimal Hewawitharana
To:	Eric Charlton
Subject:	Fwd: Comments on 4051 SOUTH ALAMEDA STREET PROJECT DEIR
Date:	Monday, March 09, 2015 2:08:41 PM
Attachments:	NRDC 4051 Alameda DEIR Comment Letter 20150309.pdf

---------- Forwarded message ----------
From: **Eldred, Spencer** <seldred@nrdc.org>
Date: Mon, Mar 9, 2015 at 12:38 PM
Subject: Comments on 4051 SOUTH ALAMEDA STREET PROJECT DEIR
To: "srimal.hewawitharana@lacity.org" <srimal.hewawitharana@lacity.org>
Cc: "Sivasubramanian, Ramya" <rsivasubramanian@nrdc.org>

Dear Ms. Hewawitharana:

Please find attached comments on behalf of the Natural Resources Defense Council concerning the Draft Environmental Impact Report for the proposed industrial warehouse project at 4051 Alameda Street on the site of the former South Central Farm (Case Number: ENV-2012-920-EIR, AA-2012-919-PMLA, DIR-2013-887-SPR). We appreciate your consideration of these comments and look forward to continued participation in the EIR process for this Project.

E67-1

Sincerely,

Ramya Sivasubramanian, Staff Attorney

Spencer Eldred, Legal Fellow

Spencer Eldred

Natural Resources Defense Council

PRIVILEGE AND CONFIDENTIALITY NOTICE

This message is intended only for the use of the individual or entity to which it is addressed and may contain information that is privileged, confidential, and exempt from disclosure under applicable law. If you are not the intended recipient of this message, you are hereby notified that disseminating, distributing, or copying it or any attachment to it is strictly prohibited.

If you have received this message in error, please notify me immediately by email and delete the original message.

March 9, 2015

Srimal Hewawitharana, Environmental Specialist II
Los Angeles City Planning Department
EIR Analysis Section
200 N. Spring Street, Room 750
Los Angeles, CA 90012
Via e-mail (srimal.hewawitharana@lacity.org)

Re: Comments on the Draft EIR, Case No. ENV-2012-920-EIR, AA-2012-919-PMLA, DIR-02013-887-SPR, State Clearinghouse Number 2014061030

Dear Ms. Hewawitharana:

On behalf of the Natural Resources Defense Council, we write to submit comments on the City Planning Department's Draft Environmental Impact Report ("DEIR") for the proposed industrial warehouse project at 4051 Alameda Street ("Industrial Project") on the site of the former South Central Farm (Case Number: ENV-2012-920-EIR, AA-2012-919-PMLA, DIR-2013-887-SPR). We believe the DEIR's analysis contains multiple inadequacies that must be addressed to comport with California Environmental Quality Act ("CEQA") requirements. We address some of these shortcomings in this letter. E67-2

The DEIR's alternatives analysis is inadequate. First, the DEIR improperly excludes the community garden alternative from full analysis. Although the DEIR states that this alternative is infeasible due to existing zoning and land-use limitations (DEIR, at p. VI-3), such limitations are not applicable. The Light Industrial Zone applicable to these parcels specifically allows for agricultural uses. *See* Los Angeles Municipal Code, Chapter 1, Article 2, Section 12.19 ("M2" LIGHT INDUSTRIAL ZONE), as amended by Ord. No. 146,030 (7/11/74) (M2 Zone allows "[a]ny open lot use permitted in an 'A' or 'R' Zone, which does not involve the use of buildings or structures other than accessory buildings incident to the use of the land."); *see also* DEIR, at p. I-5; DEIR, p. II-3 (figure II.A-5). Moreover, notwithstanding the DEIR's conclusory statement to the contrary, this alternative *does* carry local community value and economic benefits.[1] The full extent of such economic benefits would be identified and quantified *if* the DEIR performed a full E67-3

[1] For some examples of the importance and economic value of community gardens, *see* University of California, ANR Publication 8499, *Community Gardens* (September 2013), *available at* http://anrcatalog.ucdavis.edu/pdf/8499.pdf.



analysis of this alternative, allowing for a more complete alternatives comparison and assessment.[2] Failure to analyze fully this alternative could also undercut other City and State planning and policy goals, which include facilitating community gardening and urban agriculture in low-income communities, such as Southeast Los Angeles.[3] A full alternative analysis would enable a more thorough assessment of this concern. For these reasons, we believe the DEIR improperly dismisses a full analysis of the community garden alternative, for which community groups have shown strong historic and current support.

E67-3, Cntd

The DEIR also improperly omits the park or recreation alternative from full analysis. The Southeast Los Angeles Community Plan, within which these parcels are located, highlights the need for additional open space in the community and sets policies, goals, and objectives for preserving existing open space and developing or utilizing additional open space. *See*, *e.g.*, Southeast LA Community Plan at p. III-16:

> The community is still deficient in the number and location of both community and neighborhood parks.… [Policy:] Encourage the cooperation between … other public and private entities … in order to develop and utilize other open space opportunities for the community.

and *id.* at p. III-17:

> [v]ery little, important open space areas do exist separate from land under the control of the City… Open Space is important due to its role in both physical and environmental protection… Goal 5: A community with sufficient open space in balance with new development to serve the recreational, environmental, health and safety needs of the community and to protect environmental and aesthetic resources … Objective 5-1: To preserve existing open space resources and where possible develop new open space. Polic[y] 5-1.1 Encourage the retention of passive and visual open space which provides a balance to the urban development of the Plan Area.

See also DEIR, at p. IV.A-11. Turning the current vacant lot and former community farm into an Industrial Project would not only undercut these planning goals, but would also exacerbate air quality, noise, and traffic burdens in this community. Particularly given the history of

E67-4

[2] For evaluations of the fresh produce access needs in this part of Los Angeles, *see* Los Angeles Food Policy Council, *Los Angeles Food System Snapshot 2013: A baseline report of the Los Angeles regional foodshed* (2013), *available at* http://goodfoodla.org/wp-content/uploads/2013/11/LA-Food-System-Snapshot-Oct-2013-small.pdf.

[3] *See, e.g.,* City Council approval for planting fruits and vegetables in parkways, *available at* http://www.scpr.org/news/2015/03/04/50192/la-city-council-approves-curbside-planting-of-frui/; Urban Agriculture Incentive Zones Act, Gov. Code, § 51042 (2013) (allowing for "incentive zones" in urban areas where landowners can get a substantial property tax break in exchange for dedicating their vacant land to commercial or noncommercial agricultural use); Neighborhood Food Act, Civ. Code, § 1940.10 (2015); Community Food Producers or Gleaners, Health & Saf. Code, § 114376 (2015); Creation of Farm to Fork Account, Food & Agr. Code, § 49002 (2015); Backyard Personal Agriculture, Civ. Code, § 4750 (2015).

agricultural and open space use *at this site*, as well as the strong need and ongoing demand for community agriculture and open space uses here, omitting a full analysis of these alternatives to the Industrial Project is a significant failure. The DEIR also fails to analyze adequately other potential alternatives to the Industrial Project.

E67-4, Cntd

Finally, the DEIR fails to analyze adequately both the Industrial Project's air quality and greenhouse gas ("GHG") impacts and the possible and necessary mitigations for those impacts. As the DEIR admits, the Industrial Project will result in high amounts of pollutants such as VOCs, NOx, and particulate matter. *See* DEIR, at pp. IV.B-1–IV.B-13. It will result in significant air quality impacts. DEIR, at p. IV.B-16. It will also result in thousands of tons of GHG emissions. DEIR, at p. IV.D-10. These impacts are especially troubling given the lack of adequate mitigation, and the proximity to sensitive receptors (who are as close as 153 feet from the site). More than just analysis of the project's impacts, CEQA also requires the consideration of its *cumulative* impacts. Based on existing air quality burdens in the area, any impacts from the Project should be fully mitigated. Yet, the DEIR specifies only minimal air quality mitigations and *no* mitigation for the GHG emissions from the Industrial Project.

E67-5

The requirement for a full and thorough analysis of the environmental impacts, mitigations, and alternatives to a proposed project is at the heart of CEQA. Given the inadequacies with the DEIR discussed above (and by other commenters), we request the City redo its DEIR analyses to address the full and proper range of alternatives and mitigations. Only after this thorough analysis of the Industrial Project's impacts, alternatives, and all available mitigations, can the community and decision-makers fully understand and be in a position to assess the Industrial Project.

E67-6

We appreciate your consideration of these comments and look forward to continued participation in the EIR process for this Project.

E67-7

Sincerely,

Ramya Sivasubramanian
Staff Attorney

Spencer Eldred
Legal Fellow

LETTER E68

From: Srimal Hewawitharana
To: Eric Charlton
Subject: Fwd: I Reject the PIMA Warehouses!
Date: Friday, March 06, 2015 2:45:29 PM

---------- Forwarded message ----------
From: **Nancy Smith** <nancysourceress@gmail.com>
Date: Fri, Mar 6, 2015 at 1:59 PM
Subject: I Reject the PIMA Warehouses!
To: LA City Planning Department <srimal.hewawitharana@lacity.org>, Mayor Eric Garcetti <mayor.garcetti@lacity.org>, CD 1 Gilbert Cedillo <councilmember.cedillo@lacity.org>, CD 2 Paul Krekorian <councilmember.Krekorian@lacity.org>, CD 3 Bob Blumenfield <councilmember.blumenfield@lacity.org>, CD 4 Tom LaBonge <councilmember.Labonge@lacity.org>, CD 5 Paul Koretz <paul.koretz@lacity.org>, CD 6 Nury Martinez <councilmember.martinez@lacity.org>, CD 7 Felipe Fuentes <councilmember.fuentes@lacity.org>, CD 8 Bernard Parks <councilmember.parks@lacity.org>, "CD 9 Curren D. Price" <councilmember.price@lacity.org>, "CD 10 Herb J. Wesson" <councilmember.wesson@lacity.org>, CD 11 Mike Bonin <councilmember.bonin@lacity.org>, CD 12 Mitchell Englander <councilmember.englander@lacity.org>, CD 13 Mitch O'Farrell <councilmember.ofarrell@lacity.org>, CD 14 Jose Huizar <councilmember.huizar@lacity.org>, CD 15 Joe Buscaino <councilmember.buscaino@lacity.org>, "Supervisor 1 Hilda L. Solis" <hildasolis@bos.lacounty.gov>, Supervisor 2 Mark Ridley-Thomas <markridleythomas@bos.lacounty.gov>, Supervisor 3 Sheila Kuehl <sheila@bos.lacounty.gov>, Supervisor 4 Don Knabe <don@bos.lacounty.gov>, "Supervisor 5 Michael D. Antonovich" <fifthdistrict@lacbos.org>

02/27/2015 17:33:27
Nancy Smith
Zip Code 63935

South LA Sweatshops will have long term detrimental health impact to the residents of South Central Los Angeles

The City Planning Department has announced its intention to allow 4 warehouses to be built with a substandard Draft Environmental Impact Report (Case Number: ENV-2012-920-EIR, AA-2012-919-PMLA, DIR-2013-887-SPR), a move Farm representatives and the community say will have long term detrimental health impacts for local South LA residents. Plans call for 4 warehouse facilities that will draw some 75 diesel big rigs into the area every day, creating an intolerable concentration of diesel fumes and particulate matter in a neighborhood in a warehousing district already saturated with such exhaust, posing the danger of increased risks of cancer, emphysema, asthma, and increased hospitalizations to poor people of color who live in the district. South Central Farm representative Tezozomoc said, "This is an unmistakable and undeniable threat to the health and well being of the people who live here, and that the City Planning Department has accepted a substandard Draft Environmental Impact
Report on behalf of PIMA is a clear cut example of environmental racism."

E68-1

I call on the city, " to unconditionally reject the DEIR and return the land to the community to anchor an environmental justice project to begin to clean up the community". It is clear that Los Angeles City has failed the residents of South LA by considering a substandard DEIR. In 2008 the City of Los Angeles reviewed a project submitted by Horowitz to do one warehouse that encompassed 437,196 sq. ft. (see Case No. ENV-2008-799-MND, VTT-61482, DIR-2008-841-SPR, aka 41st and Alameda Warehouse Project) and at that time there would be 264 truck trips per day. In the recent DEIR PIMA will be developing 481,022 sq. ft. of warehouse space; comprised of 4 buildings and over 2000 car trips per day. In PIMA's proposal they claim a mere 75 trip trucks a day. There is a difference of 189 truck trips per days for a warehouse space that is 10% larger. There is a difference of 70% in truck trips. What is problematic with this assumption is that all further analysis will be based on
the underspecified 75 truck trips per day. While this under estimation of the truck trips may get the project approved by the City; the city under Jan Perry has supported this project, it will have long negative impact on the residents of South Los Angeles.
In the realm of Air Quality Health Risk Assessment the truck trips are further down estimated to 31 diesel fueled trucks per day. The Kleinfelder's Health Risk Analysis is faulty because it also assumes a degraded amount of truck trips per day; 75 truck trips per day.

E68-2

Regional Air Quality
The air quality in Southern California does not meet the state and federal standards. The American Lung Association consistently gives Los Angeles County failing grades in the amount of ozone and particulate pollution in the air. Although smog levels are impacted by seasons and weather patterns, smog is visible in the air on most days.

E68-3

Online location of the 2015 DEIR:
http://cityplanning.lacity.org/eir/4051SoAlamedaStProj/Index.pdf
2008 MND by Horowitz http://1drv.ms/1BiXQ2k, http://1drv.ms/1BiY6OM

Hi my name is Jonathan Sosa,

I live on Central Avenue of Los Angeles. I have lived in Los Angeles all my life. I've been working at Poetry since April 2008. I am currently in the sales department. I do multiple things for my job: sales, shipping company POs, invoices, and also packing merchandise. With this job, I have been able to support my family. It has helped me become a better member of my family.

Working at Poetry has been a great experience. Poetry's working environment is professional and very great. I look forward to working with my co-workers every day. We get through the good times and bad times together, while always looking to help each other towards success. The product that our company sells brings happiness to many people around the world. By providing great merchandise, we give people opportunities for their business while providing people what they want. We help support, by giving jobs, not only here in Los Angeles, but also in China. I am happy to say Poetry is a great company. E69-1

Thank You.

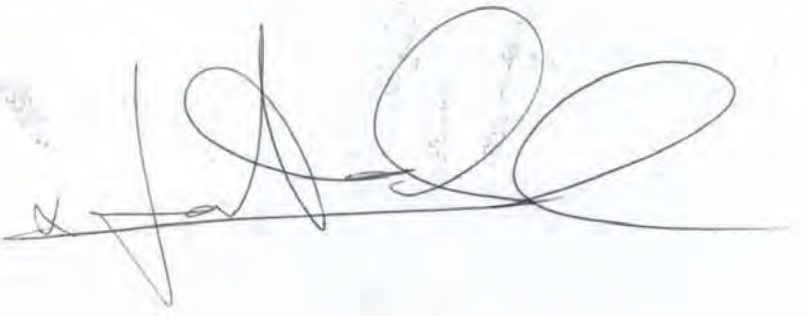


Hola mi nombre es Jonathan Sosa,

Yo vivo en la Avenida Central de Los Ángeles. He vivido en Los Angeles durante toda mi vida. He estado trabajando en la compania de Poetry desde abril de 2008. Actualmente estoy en el departamento de ventas. Hago varias cosas para mi trabajo: ventas, enviando POs, y también el embalaje de mercancías. Con este trabajo, he sido capaz de mantener a mi familia. Me ha ayudado a ser un mejor miembro de mi familia.

Trabajar en Poetry ha sido una gran experiencia. Entorno de trabajo de Poetry es profesional y muy grande. Espero con interés trabajar con mis compañeros de trabajo todos los días. Recibimos a través de los buenos y malos momentos juntos, pero siempre mirando para ayudarnos unos a otros hacia el éxito. El producto que nuestra empresa vende trae felicidad a muchas personas alrededor del mundo. Al proporcionar la mercancía, nos damos a la gente oportunidades para su negocio mientras que proporciona a la gente lo que ellos quieren. Ayudamos apoyo, dando puestos de trabajo, no sólo aquí en Los Ángeles, pero también en China. Estoy feliz de decir que la Poetry es una gran compañía.

Muchas gracias.



LETTER E70

Hola mi nombre es laura soto
llevo casi 13 años en el area
de los Angeles C.A. En la enpresa
IMPACT, INC. llevo casi 5 años
y en este tienpo e estado bien
agusto que como es el patron?
es bueno con sus empleados
esta al pendiente de todos
y trata de ser justo cuando
es trabajo estrabajop cuando es
un poco de diversion si nos divertimos
nos saluda se aserca a nosotres
y por eso y muchas cosas yo
le doy las gracias y ojala sienpre
siga haci y no se acabe su enpresa
por lo contrario cresca cada dia mas

AT. LAURA SOTO

E70-1

RECEIVED
CITY OF LOS ANGELES
MAR 12 2015
ENVIRONMENTAL
UNIT

LETTER E71

From:	Srimal Hewawitharana
To:	Eric Charlton
Subject:	Fwd: Comments on the Draft EIR, Case NO. ENV-2012-919-PMLA, DIR-O203-887-SPR, State Clearinghouse Number 2014061030.
Date:	Monday, March 09, 2015 2:25:54 PM

---------- Forwarded message ----------
From: **Lisa Taylor** <lisathetay@gmail.com>
Date: Mon, Mar 9, 2015 at 2:09 PM
Subject: Comments on the Draft EIR, Case NO. ENV-2012-919-PMLA, DIR-O203-887-SPR, State Clearinghouse Number 2014061030.
To: Srimal.hewawitharana@lacity.org

Re: Comments on the Draft EIR, Case NO. ENV-2012-919-PMLA, DIR-O203-887-SPR, State Clearinghouse Number 2014061030.

Dear Ms. Hewawitharana:

Please do not accept the Draft EIR in its current form. It goes against the Open Space element in the City's master plan by opting against preservation and restoration of green open space in favor of more industrial uses. E71-1

The best use would be to return it to the community as an urban garden with recreational opportunities. Additionally, more diesel truck trips required for the warehouse activity will only add to the area's already unacceptable level of air and noise pollution and decrease pedestrian and automobile safety by increasing traffic congestion adjacent to a residential area and the Metro Blue Line. E71-2

The DEIR fails to recognize the community value in using the land for recreational purposes. Please re-do this DEIR to take into consideration community values in using this land for gardening and recreation. E71-3

Sincerely,

Lisa Taylor

4808 Hollow Corner Rd. #241

Culver City, CA 90230

From: Srimal Hewawitharana
To: Eric Charlton
Subject: Fwd: I Reject the PIMA Warehouses!
Date: Friday, March 06, 2015 2:34:27 PM

---------- Forwarded message ----------
From: **Mr Tezozomoc** <tezozomoc@hotmail.com>
Date: Fri, Mar 6, 2015 at 1:58 PM
Subject: I Reject the PIMA Warehouses!
To: LA City Planning Department <srimal.hewawitharana@lacity.org>, Mayor Eric Garcetti <mayor.garcetti@lacity.org>, CD 1 Gilbert Cedillo <councilmember.cedillo@lacity.org>, CD 2 Paul Krekorian <councilmember.Krekorian@lacity.org>, CD 3 Bob Blumenfield <councilmember.blumenfield@lacity.org>, CD 4 Tom LaBonge <councilmember.Labonge@lacity.org>, CD 5 Paul Koretz <paul.koretz@lacity.org>, CD 6 Nury Martinez <councilmember.martinez@lacity.org>, CD 7 Felipe Fuentes <councilmember.fuentes@lacity.org>, CD 8 Bernard Parks <councilmember.parks@lacity.org>, "CD 9 Curren D. Price" <councilmember.price@lacity.org>, "CD 10 Herb J. Wesson" <councilmember.wesson@lacity.org>, CD 11 Mike Bonin <councilmember.bonin@lacity.org>, CD 12 Mitchell Englander <councilmember.englander@lacity.org>, CD 13 Mitch O'Farrell <councilmember.ofarrell@lacity.org>, CD 14 Jose Huizar <councilmember.huizar@lacity.org>, CD 15 Joe Buscaino <councilmember.buscaino@lacity.org>, "Supervisor 1 Hilda L. Solis" <hildasolis@bos.lacounty.gov>, Supervisor 2 Mark Ridley-Thomas <markridleythomas@bos.lacounty.gov>, Supervisor 3 Sheila Kuehl <sheila@bos.lacounty.gov>, Supervisor 4 Don Knabe <don@bos.lacounty.gov>, "Supervisor 5 Michael D. Antonovich" <fifthdistrict@lacbos.org>

02/27/2015 16:54:38
Mr Tezozomoc
Zip Code 91352

South LA Sweatshops will have long term detrimental health impact to the residents of South Central Los Angeles

The City Planning Department has announced its intention to allow 4 warehouses to be built with a substandard Draft Environmental Impact Report (Case Number: ENV-2012-920-EIR, AA-2012-919-PMLA, DIR-2013-887-SPR), a move Farm representatives and the community say will have long term detrimental health impacts for local South LA residents. Plans call for 4 warehouse facilities that will draw some 75 diesel big rigs into the area every day, creating an intolerable concentration of diesel fumes and particulate matter in a neighborhood in a warehousing district already saturated with such exhaust, posing the danger of increased risks of cancer, emphysema, asthma, and increased hospitalizations to poor people of color who live in the district. South Central Farm representative Tezozomoc said, "This is an unmistakable and undeniable threat to the health and well being of the people who live here, and that the City Planning Department has accepted a substandard Draft Environmental Impact
Report on behalf of PIMA is a clear cut example of environmental racism."

E72-1

I call on the city, " to unconditionally reject the DEIR and return the land to the community to anchor an environmental justice project to begin to clean up the community". It is clear that Los Angeles City has failed the residents of South LA by considering a substandard DEIR. In 2008 the City of Los Angeles reviewed a project submitted by Horowitz to do one warehouse that encompassed 437,196 sq. ft. (see Case No. ENV-2008-799-MND, VTT-61482, DIR-2008-841-SPR, aka 41st and Alameda Warehouse Project) and at that time there would be 264 truck trips per day. In the recent DEIR PIMA will be developing 481,022 sq. ft. of warehouse space; comprised of 4 buildings and over 2000 car trips per day. In PIMA's proposal they claim a mere 75 trip trucks a day. There is a difference of 189 truck trips per days for a warehouse space that is 10% larger. There is a difference of 70% in truck trips. What is problematic with this assumption is that all further analysis will be based on
the underspecified 75 truck trips per day. While this under estimation of the truck trips may get the project approved by the City; the city under Jan Perry has supported this project, it will have long negative impact on the residents of South Los Angeles.
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E72-2

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E72-3

Online location of the 2015 DEIR:
http://cityplanning.lacity.org/eir/4051SoAlamedaStProj/Index.pdf
2008 MND by Horowitz http://1drv.ms/1BiXQ2k, http://1drv.ms/1BiY6OM

From:	Srimal Hewawitharana
To:	Eric Charlton
Subject:	Fwd: Case Number: ENV-2012-920-EIR, AA-2012-919-PMLA, DIR-2013-887 –SPR State Clearinghouse Number: 2014061030
Date:	Friday, March 06, 2015 10:23:40 AM

---------- Forwarded message ----------
From: **Mr. Tezozomoc** <tezozomoc@hotmail.com>
Date: Fri, Mar 6, 2015 at 10:04 AM
Subject: Case Number: ENV-2012-920-EIR, AA-2012-919-PMLA, DIR-2013-887 –SPR State Clearinghouse Number: 2014061030
To: "srimal.hewawitharana@lacity.org" <srimal.hewawitharana@lacity.org>

When is there supposed to be a vote on this item...

Tezozomoc
South Central Farmers

E73-1

From: Srimal Hewawitharana
To: Eric Charlton
Subject: Fwd: please find the attached spreadsheet that has been collected
Date: Monday, March 09, 2015 4:17:32 PM
Attachments: We reject the PIMA Warehouses! (Responses).xlsx

---------- Forwarded message ----------
From: **Mr. Tezozomoc** <tezozomoc@hotmail.com>
Date: Mon, Mar 9, 2015 at 3:35 PM
Subject: please find the attached spreadsheet that has been collected
To: "srimal.hewawitharana@lacity.org" <srimal.hewawitharana@lacity.org>

with people opposition to the DEIR for the 4051 Alameda Project.. E74-1

Tezozomoc

LETTER E74

Timestamp	First Name	Last Name	Zip Code	Email
2/27/2015 15:54:39	Mr	Tezozomoc	91352	tezozomoc@hotmail.com
2/27/2015 15:55:13	Mr	Tezozomoc	91352	tezozomoc@hotmail.com
2/27/2015 15:56:26	Mr	Tezozomoc	91345	tezo@southcentralfarmers
2/27/2015 16:25:37	Mario	Montano	80909	mmontano@coloradocolle
2/27/2015 16:33:27	Nancy	Smith	63935	nancysourceress@gmail.c
2/27/2015 16:34:53	Nancy	Smith	63935	nancysourceress@gmail.c
2/27/2015 19:59:08	Valerie	Belt	90272	vbelt@hotmail.com
2/27/2015 20:58:47	Carol	Yost	10011-6194	yostc@hotmail.com
2/27/2015 21:39:04	Gwendolyn	Forrest	90026	gmforrest@hotmail.com
2/27/2015 22:18:33	Andrew	Altamirano	90026	andrew_altamirano@yaho
2/28/2015 0:08:56	jose	lopez	90016	joseclopez@hotmail.com
2/28/2015 1:21:24	Frank	Hill	91601-1623	au760@lafn.org
2/28/2015 6:09:31	Ayanna	Ware	90221	Tollyzeekay@gmail.com
2/28/2015 6:11:24	Lauren	Spetoskey	90221	kiraninakajima@gmail.com
2/28/2015 6:12:46	Rachel	Lujan	90221	Rxcel@ca.rr.com
2/28/2015 8:14:29	Paula	Kleihauer	91401	interimpwk@yahoo.com
2/28/2015 9:07:48	Jack	Neff	90049	jackneff01@yahoo.com
2/28/2015 9:50:14	Sheila	Goldner	91601	ar320@lafn.org
2/28/2015 12:46:46	lauren	Ornelas	94928	lauren@foodispower.org
2/28/2015 13:49:06	Will	Yeager	90291	gardenbeekeeper@yahoo.
2/28/2015 14:27:58	Heather	Chang	93940	heatherfchang@yahoo.con
2/28/2015 14:29:52	Heather	Chang	93940	heatherfchang@yahoo.con
2/28/2015 14:38:55	Dona	van Bloemen	90403	agataterra@yahoo.com
2/28/2015 17:04:50	Eve	Avila	90007	083aa@williams.edu
2/28/2015 21:24:33	Megg	sohn	80301	meggsoprion@gmail.com
2/28/2015 23:38:12	Linda	Piera-Avila	90401	lindap_a@verizon.net
2/28/2015 23:38:57	Linda	Piera-Avila	90401	lindap_a@verizon.net
3/1/2015 0:13:45	Meredyth	Wilson	90026	meredyth.wilson@gmail.co
3/1/2015 1:43:42	Maritza	Estrada	90011	Momocheetxb@gmail.com
3/1/2015 10:16:06	Sergio	Monteiro	90025	s.monteiro1@yahoo.com
3/1/2015 10:24:45	L.	Geraghty	83712	lauraliiha@gmail.com
3/1/2015 10:38:08	Marcy	Winograd	90405	Winogradteach@gmail.cor

LETTER E74

3/1/2015 12:08:15	Jimi	McKay		8013 jimimckay@hotmail.com
3/1/2015 14:35:55	Elaine	Wittert		90405 elainewittert@gmail.com
3/1/2015 16:28:32	Cordula	Ohman		90405 Environmentoy@gmail.cor
3/1/2015 17:44:18	John	Quigley		90041 spectralq@aol.com
3/1/2015 17:56:18	juan	ramirez		90210 juan@csu.fullerton
3/1/2015 21:10:20	Patricia	Maddock		90405 patsymadd@yahoo.com
3/1/2015 21:12:14	Brent	Maddock		90405 brentmad@google.com
3/2/2015 5:41:39	Lisa	Taylor		90230 lisathetay@gmail.com
3/2/2015 10:23:59	Jesse	Moorman		90039 moorman.jesse@gmail.co
3/2/2015 10:53:19	Lorraine	Sanchez		90404 ms.lorraine.sanchez@gma
3/2/2015 13:00:08	Sonia	Gamboa		90744 gamboa1274@yahoo.com
3/2/2015 13:52:22	Tristan	Quinn-Thibodeau		11216 tristanqt@gmail.com
3/2/2015 13:53:30	LESLIE	MORAVA		90272 LESLIEMORAVA@GMAIL
3/2/2015 14:41:33	Erica	Wohldmann		91202 e_wohldmann@hotmail.co
3/2/2015 14:43:42	M. Jahi	Chappell		55409 jahi.chappell@gmail.com
3/2/2015 14:59:38	Kathleen	Masser		90731 katmas@earthlink.net
3/2/2015 15:34:17	Gene	Ulmer	84121-1871	gulmer@mcn.org
3/2/2015 17:23:56	Emma	cramp		90066 Emmacramp1@gmail.com
3/2/2015 19:40:34	Rebecah	Ericksen		91024 Rebecahericksen@gmail.c
3/3/2015 2:02:58	Zoe	Brent		95472 zoebrent@gmail.com
3/3/2015 6:33:01	Tanya	Kerssen		94618 tkerssen@foodfirst.org
3/3/2015 6:42:42	Alberto	Alonso-Fradejas	2518AX	fradejas@iss.nl
3/3/2015 6:56:45	Geovanni	Brewer		90048 bandwtv@pacbell.net
3/3/2015 7:53:34	Stephen	Bartlett		40206 sbartlett@ag-missions.org
3/3/2015 13:41:56	Tirso	Moreno		32703 tirsomoreno@hotmail.com
3/3/2015 18:01:13	jean	molina		90815 jeanmolina62@gmail.com
3/3/2015 18:09:05	Susette	Horspool		91001 shtiger@att.net
3/3/2015 18:15:25	Helgaleena	Healingline		53716 helgaleenas@yahoo.com
3/3/2015 20:26:38	Nicole	Richardson		90606 pikapikabomb@gmail.com
3/4/2015 8:02:41	Radhika	Balakrishnan		10029 rbalakra@gmail.com
3/4/2015 9:41:14	Sara	Mersha		2148 smersha@grassrootsonlin
3/4/2015 12:07:22	Joel	Garcia		91754 joelragegarcia@sbcglobal.
3/4/2015 12:10:50	Alfredo	Huante		90034 huante.a@gmail.com
3/4/2015 12:12:26	Genaro	Ulloa		90033 weinventyou@gmail.com
3/4/2015 12:13:57	Amaru	Tejeda		90033 amaru.tejeda@gmail.com
3/4/2015 12:28:28	anna	sorkina		94044 anna_s2662@yahoo.com
3/4/2015 12:54:40	Leon	Arellano		90033 arellanol@ladlinc.org
3/4/2015 12:54:42	Leon	Arellano		90033 arellanol@ladlinc.org
3/4/2015 14:14:11	Paul	Sheldon		97530 pmsheldon@gmail.com
3/4/2015 19:57:30	Tomas	Madrigal		98225 tomasm@foodjustice.org

LETTER E74

3/4/2015 21:12:26	Martha	Pool	90004	mdm_53ows@yahoo.com
3/5/2015 8:34:08	Ariana	de Lena	98105	arianacelene@gmail.com
3/5/2015 12:27:13	Molly	Ortiz	90029	molly.ortiz@gmail.com
3/5/2015 22:11:02	Michelle	Mascarenhas	94703	michellems3@gmail.com
3/6/2015 11:27:51	Thuha	Tran	92708	bec248@gmail.com
3/6/2015 12:37:12	Margaret	Schultz-Akerson	90405	pastorpeg@sbcglobal.net
3/6/2015 21:15:41	Denise	Robb	91106	Denise@panix.com
3/6/2015 21:18:46	Cindyroy	Komoto	91103	realmshifter@gmail.com
3/6/2015 21:58:22	Victor	Ortiz	91040	vortiz56@earthlink.net
3/6/2015 22:49:08	Alec	Marken	92691	notavailable1@yahoo.com
3/6/2015 23:22:27	Perias	Pillay	90029	pspillay@yahoo.com
3/7/2015 7:47:57	Brigget	LeClair	98248	wakerobinfarm@gmail.con
3/8/2015 0:33:15	Camilla Maria Vittoria	Succetti	23020	camillamv.succetti@gmail.
3/8/2015 0:35:16	Giovanni Andrea	Succetti	23020	succe96@hotmail.it
3/8/2015 8:50:34	maureen	cruise	90272	mcruised@aol.com
3/8/2015 9:51:52	Stacy	Valdez	91342	s.valdez0517@gmail.com
3/8/2015 11:24:07	sissel	hawkes	90066	shawkes2@aol.com
3/8/2015 20:37:18	Allie	Splain	90068	asplain@gmail.com
3/8/2015 21:11:41	Scarlettah	Schaefer	90066	scarlettah@gmail.com
3/8/2015 21:43:04	Ivana	topalovic	91306	itopa001@ucr.edu
3/9/2015 9:14:50	Nicole	Frazier	90004	Colie10311@gmail.com
3/9/2015 10:01:46	Richard	Matthews	90731	rickmmmm@aol.com
3/9/2015 12:44:56	Keith	Sauter	90036	keith4f@earthlink.net

LETTER E74

Politicians that should get your email?
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ıas announced its intention to allow 4 warehouses to be built with a substandard Draft Environmental Impact Report (Case Number: ENV-2012-92
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nas announced its intention to allow 4 warehouses to be built with a substandard Draft Environmental Impact Report (Case Number: ENV-2012-92
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LETTER E74

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LETTER E74

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LETTER E74

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LETTER E74

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LETTER E74

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LETTER E74

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outh Central Farm representative Tezozomoc said, “This is an unmistakable and undeniable threat to the health and well being of the people who

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RECEIVED
CITY OF LOS ANGELES
APR 03 2015
ENVIRONMENTAL UNIT

Sonia Torres
24th St
Los Angeles,CA
Marzo 13 del 2015

A quien corresponda,

Mi nombre es Sonia Torres y he vivido en la 24th St. y Central por mas de 20 años. Por los ultimos 10 años, he trabajado en la compania de costura, en la cual el patron es Tony. Yo he trabajado a gusto porque me gusta lo que hago. Yo tengo un buen patron que nunca nos ha dejado de pagar semana por semana. Tambien soy feliz porque tengo buenas y buenos compañeros.

To whomever it may concern,

My name is Sonia Torres and I have lived on 24th St and Central Ave for more than 20 years. For the last 10 years, I have been working for the company Impact in which Tony is the owner. I am happy to be working for this company because I like what I do and Tony has been a great boss. He has always paid on time and fairly. I have been fortunate enough to have friendly coworkers as well. Being happy at work has made me happy at home. E75-1

Sincerely,

Sonia Torres

Hi my name is Jose Urias,

I live on Figueroa Street of Los Angeles. I have lived in Los Angeles since 1998. I've been working at Poetry since July 2011. I am currently in the sales department. I do multiple things for my job: sales, shipping company POs, and also packing merchandise. With this job, I have been able to support my family. It has helped me become a better member of my family.

Working at Poetry has been a great experience. Poetry's working environment is professional and very great. I look forward to working with my co-workers every day. We get through the good times and bad times together, while always looking to help each other towards success. The product that our company sells brings happiness to many people around the world. By providing great merchandise, we give people opportunities for their business while providing people what they want. We help support, by giving jobs, not only here in Los Angeles, but also in China. I am happy to say Poetry is a great company.

E76-1

Thank You.

Jose Urias

Hola mi nombre es Jose Urias,

Yo vivo en la Avenida Figueroa de Los Ángeles. He vivido en Los Angeles desde 1998. He estado trabajando en la compania de Poetry desde julio de 2011. Actualmente estoy en el departamento de ventas. Hago varias cosas para mi trabajo: ventas, enviando POs, y también el embalaje de mercancías. Con este trabajo, he sido capaz de mantener a mi familia. Me ha ayudado a ser un mejor miembro de mi familia.

Trabajar en Poetry ha sido una gran experiencia. Entorno de trabajo de Poetry es profesional y muy grande. Espero con interés trabajar con mis compañeros de trabajo todos los días. Recibimos a través de los buenos y malos momentos juntos, pero siempre mirando para ayudarnos unos a otros hacia el éxito. El producto que nuestra empresa vende trae felicidad a muchas personas alrededor del mundo. Al proporcionar la mercancía, nos damos a la gente oportunidades para su negocio mientras que proporciona a la gente lo que ellos quieren. Ayudamos apoyo, dando puestos de trabajo, no sólo aquí en Los Ángeles, pero también en China. Estoy feliz de decir que la Poetry es una gran compañía.

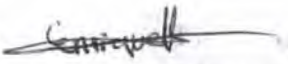
Muchas gracias.

Jose Urias

Hi my name is Enrique Vasquez,

I live on Figueroa Street of Los Angeles. I have lived in Los Angeles since 1998. I've been working at Poetry since September 2006. I am currently in the sales department. I do multiple things for my job: sales, shipping company POs, and also packing merchandise. With this job, I have been able to support my family. It has helped me become a better member of my family.

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Thank You. 

Hola mi nombre es Enrique Vasquez,

Yo vivo en la calle Figueroa de Los Ángeles. He vivido en Los Angeles desde 1998. He estado trabajando en la compania de Poetry desde septiembre de 2006. Actualmente estoy en el departamento de ventas. Hago varias cosas para mi trabajo: ventas, enviando POs, y también el embalaje de mercancías. Con este trabajo, he sido capaz de mantener a mi familia. Me ha ayudado a ser un mejor miembro de mi familia.

Trabajar en Poetry ha sido una gran experiencia. Entorno de trabajo de Poetry es profesional y muy grande. Espero con interés trabajar con mis compañeros de trabajo todos los días. Recibimos a través de los buenos y malos momentos juntos, pero siempre mirando para ayudarnos unos a otros hacia el éxito. El producto que nuestra empresa vende trae felicidad a muchas personas alrededor del mundo. Al proporcionar la mercancía, nos damos a la gente oportunidades para su negocio mientras que proporciona a la gente lo que ellos quieren. Ayudamos apoyo, dando puestos de trabajo, no sólo aquí en Los Ángeles, pero también en China. Estoy feliz de decir que la Poetry es una gran compañía.

Muchas gracias. 

LETTER E78

RECEIVED
CITY OF LOS ANGELES
MAR 10 2015
ENVIRONMENTAL
UNIT

3-05-15

Mi nombre es Teresa Ventura. he trabajando para esta compañia desde febrero del 2004 y durante años [redacted]abia trimiado y chequeado en 2013 mi patrón me dio la oportunidad de trabajar en la Limpieza de la oficina trabajo Que e desarrollado Con mucho gusto y Ser lo mejor Que pueda dia a dia.

Ya Que gracias a mi trabajo Puedo mantener a mis dos hijas: llevando aqui 11 años trabajando para Impact.

E78-1

Vivo 7515 S Broadway por mas de 14 años.

Teresa Ventura.

From: Srimal Hewawitharana
To: Eric Charlton
Subject: Fwd: I Reject the PIMA Warehouses!
Date: Friday, March 06, 2015 2:58:02 PM

---------- Forwarded message ----------
From: **Ayanna Ware** <Tollyzeekay@gmail.com>
Date: Fri, Mar 6, 2015 at 2:04 PM
Subject: I Reject the PIMA Warehouses!
To: LA City Planning Department <srimal.hewawitharana@lacity.org>, Mayor Eric Garcetti <mayor.garcetti@lacity.org>, CD 1 Gilbert Cedillo <councilmember.cedillo@lacity.org>, CD 2 Paul Krekorian <councilmember.Krekorian@lacity.org>, CD 3 Bob Blumenfield <councilmember.blumenfield@lacity.org>, CD 4 Tom LaBonge <councilmember.Labonge@lacity.org>, CD 5 Paul Koretz <paul.koretz@lacity.org>, CD 6 Nury Martinez <councilmember.martinez@lacity.org>, CD 7 Felipe Fuentes <councilmember.fuentes@lacity.org>, CD 8 Bernard Parks <councilmember.parks@lacity.org>, "CD 9 Curren D. Price" <councilmember.price@lacity.org>, "CD 10 Herb J. Wesson" <councilmember.wesson@lacity.org>, CD 11 Mike Bonin <councilmember.bonin@lacity.org>, CD 12 Mitchell Englander <councilmember.englander@lacity.org>, CD 13 Mitch O'Farrell <councilmember.ofarrell@lacity.org>, CD 14 Jose Huizar <councilmember.huizar@lacity.org>, CD 15 Joe Buscaino <councilmember.buscaino@lacity.org>, "Supervisor 1 Hilda L. Solis" <hildasolis@bos.lacounty.gov>, Supervisor 2 Mark Ridley-Thomas <markridleythomas@bos.lacounty.gov>, Supervisor 3 Sheila Kuehl <sheila@bos.lacounty.gov>, Supervisor 4 Don Knabe <don@bos.lacounty.gov>, "Supervisor 5 Michael D. Antonovich" <fifthdistrict@lacbos.org>

02/28/2015 07:09:30
Ayanna Ware
Zip Code 90221

South LA Sweatshops will have long term detrimental health impact to the residents of South Central Los Angeles

The City Planning Department has announced its intention to allow 4 warehouses to be built with a substandard Draft Environmental Impact Report (Case Number: ENV-2012-920-EIR, AA-2012-919-PMLA, DIR-2013-887-SPR), a move Farm representatives and the community say will have long term detrimental health impacts for local South LA residents. Plans call for 4 warehouse facilities that will draw some 75 diesel big rigs into the area every day, creating an intolerable concentration of diesel fumes and particulate matter in a neighborhood in a warehousing district already saturated with such exhaust, posing the danger of increased risks of cancer, emphysema, asthma, and increased hospitalizations to poor people of color who live in the district. South Central Farm representative Tezozomoc said, "This is an unmistakable and undeniable threat to the health and well being of the people who live here, and that the City Planning Department has accepted a substandard Draft Environmental Impact
Report on behalf of PIMA is a clear cut example of environmental racism."

E79-1

I call on the city, " to unconditionally reject the DEIR and return the land to the community to anchor an environmental justice project to begin to clean up the community". It is clear that Los Angeles City has failed the residents of South LA by considering a substandard DEIR. In 2008 the City of Los Angeles reviewed a project submitted by Horowitz to do one warehouse that encompassed 437,196 sq. ft. (see Case No. ENV-2008-799-MND, VTT-61482, DIR-2008-841-SPR, aka 41st and Alameda Warehouse Project) and at that time there would be 264 truck trips per day. In the recent DEIR PIMA will be developing 481,022 sq. ft. of warehouse space; comprised of 4 buildings and over 2000 car trips per day. In PIMA's proposal they claim a mere 75 trip trucks a day. There is a difference of 189 truck trips per days for a warehouse space that is 10% larger. There is a difference of 70% in truck trips. What is problematic with this assumption is that all further analysis will be based on
the underspecified 75 truck trips per day. While this under estimation of the truck trips may get the project approved by the City; the city under Jan Perry has supported this project, it will have long negative impact on the residents of South Los Angeles.
In the realm of Air Quality Health Risk Assessment the truck trips are further down estimated to 31 diesel fueled trucks per day. The Kleinfelder's Health Risk Analysis is faulty because it also assumes a degraded amount of truck trips per day; 75 truck trips per day.

E79-2

Regional Air Quality
The air quality in Southern California does not meet the state and federal standards. The American Lung Association consistently gives Los Angeles County failing grades in the amount of ozone and particulate pollution in the air. Although smog levels are impacted by seasons and weather patterns, smog is visible in the air on most days.

E79-3

Online location of the 2015 DEIR:
http://cityplanning.lacity.org/eir/4051SoAlamedaStProj/Index.pdf
2008 MND by Horowitz http://1drv.ms/1BiXQ2k, http://1drv.ms/1BiY6OM

From:	Srimal Hewawitharana
To:	Eric Charlton
Subject:	Fwd: DEIR/2014061030: Request to Revise to Value Community Gardens & Recreational Space
Date:	Monday, March 09, 2015 8:29:13 AM

---------- Forwarded message ----------
From: **Marcy Winograd** <winogradteach@gmail.com>
Date: Sat, Mar 7, 2015 at 7:02 PM
Subject: DEIR/2014061030: Request to Revise to Value Community Gardens & Recreational Space
To: Srimal.hewawitharana@lacity.org, Marcy Winograd <winogradteach@gmail.com>

March 7, 2014

Srimal Hewawitharana ,Environmental Specialist II

Los Angeles City Planning Department

EIR Analysis Section

200 N. Spring Street, Room 750

Los Angeles, CA 90012

Srimal.hewawitharana@lacity.org

Re: Comments on the Draft EIR, Case NO. ENV-2012-919-PMLA, DIR-O203-887-SPR, State Clearinghouse Number 2014061030.

(Note, this email is being copied and shared with other teachers in South Los Angeles.)

Dear Ms. Hewawitharana:

I am a former congressional candidate, now public high school teacher at LAUSD'S Venice HS in Los Angeles, where my students are fortunate to learn about organic gardening at the school's wonderful community garden. Previously, I taught at Manual Arts HS and Crenshaw HS, both located in South LA where youth Diabetes Type II has reached epic proportions, community gardens are lacking, and food deserts deny families access to healthy food.

The DEIR's conclusion that community gardens do not carry local community value and economic benefits is way off base, and, frankly, insensitive to communities of color. For my former students, for the people of South LA, access to healthy food – broccoli, asparagus, tomatoes (as opposed to chips, sodas, and candy), as well as skills to produce this food -- are matters of life and death, of sight and blindness. In essence, the DEIR's conclusion negating community value of organic gardens sends a Marie Antoinette message – not let them eat cake, but let them feast on salt, sugar, and fat while other

E80-1

more fortunate areas of Los Angeles enjoy the privilege of eating healthy food and living robust lives.

I was equally appalled to read that the DEIR fails to recognize the community value in using the land for recreational purposes. Are we to believe there is a positive net gain in setting aside the land for polluting industrial use, for possible release of carcinogens and other toxins, rather than giving the children of Los Angeles a place to play and run and get in shape? This is a shameful conclusion, truly embarrassing to read. E80-2

Please re-do this DEIR to take into consideration the abundant community values in using this land for gardening and recreation. E80-3

Thank you for your public service.

Sincerely,

Marcy Winograd

Teacher, Venice HS

2447 3rd Street

Santa Monica, CA 90405

Cell: 310-795-2322

LETTER E81

From: Srimal Hewawitharana
To: Eric Charlton
Subject: Fwd: I Reject the PIMA Warehouses!
Date: Friday, March 06, 2015 3:05:02 PM

---------- Forwarded message ----------
From: **Carol Yost** <yostc@hotmail.com>
Date: Fri, Mar 6, 2015 at 1:59 PM
Subject: I Reject the PIMA Warehouses!
To: LA City Planning Department <srimal.hewawitharana@lacity.org>, Mayor Eric Garcetti <mayor.garcetti@lacity.org>, CD 1 Gilbert Cedillo <councilmember.cedillo@lacity.org>, CD 2 Paul Krekorian <councilmember.Krekorian@lacity.org>, CD 3 Bob Blumenfield <councilmember.blumenfield@lacity.org>, CD 4 Tom LaBonge <councilmember.Labonge@lacity.org>, CD 5 Paul Koretz <paul.koretz@lacity.org>, CD 6 Nury Martinez <councilmember.martinez@lacity.org>, CD 7 Felipe Fuentes <councilmember.fuentes@lacity.org>, CD 8 Bernard Parks <councilmember.parks@lacity.org>, "CD 9 Curren D. Price" <councilmember.price@lacity.org>, "CD 10 Herb J. Wesson" <councilmember.wesson@lacity.org>, CD 11 Mike Bonin <councilmember.bonin@lacity.org>, CD 12 Mitchell Englander <councilmember.englander@lacity.org>, CD 13 Mitch O'Farrell <councilmember.ofarrell@lacity.org>, CD 14 Jose Huizar <councilmember.huizar@lacity.org>, CD 15 Joe Buscaino <councilmember.buscaino@lacity.org>, "Supervisor 1 Hilda L. Solis" <hildasolis@bos.lacounty.gov>, Supervisor 2 Mark Ridley-Thomas <markridleythomas@bos.lacounty.gov>, Supervisor 3 Sheila Kuehl <sheila@bos.lacounty.gov>, Supervisor 4 Don Knabe <don@bos.lacounty.gov>, "Supervisor 5 Michael D. Antonovich" <fifthdistrict@lacbos.org>

02/27/2015 21:58:46
Carol Yost
Zip Code 10011-6194

South LA Sweatshops will have long term detrimental health impact to the residents of South Central Los Angeles The City Planning Department has announced its intention to allow 4 warehouses to be built with a substandard Draft Environmental Impact Report (Case Number: ENV-2012-920-EIR, AA-2012-919-PMLA, DIR-2013-887-SPR), a move Farm representatives and the community say will have long term detrimental health impacts for local South LA residents. Plans call for 4 warehouse facilities that will draw some 75 diesel big rigs into the area every day, creating an intolerable concentration of diesel fumes and particulate matter in a neighborhood in a warehousing district already saturated with such exhaust, posing the danger of increased risks of cancer, emphysema, asthma, and increased hospitalizations to poor people of color who live in the district. South Central Farm representative Tezozomoc said, "This is an unmistakable and undeniable threat to the health and well being of the people who live here, and that the City Planning Department has accepted a substandard Draft Environmental Impact Report on behalf of PIMA is a clear cut example of environmental racism." I call on the city, " to unconditionally reject the DEIR and return the land to the community to anchor an environmental justice project to begin to clean up the community". It is clear that Los Angeles City has failed the residents of South LA by considering a substandard DEIR. In 2008 the City of Los Angeles reviewed a project submitted by Horowitz to do one warehouse that encompassed 437,196 sq. ft. (see Case No. ENV-2008-799-MND, VTT-61482, DIR-2008-841-SPR, aka 41st and Alameda Warehouse Project) and at that time there would be 264 truck trips per day. In the recent DEIR PIMA will be developing 481,022 sq. ft. of warehouse space; comprised of 4 buildings and over 2000 car trips per day. In PIMA's proposal they claim a mere 75 trip trucks a day. There is a difference of 189 truck trips per days for a warehouse space that is 10% larger. There is a difference of 70% in truck trips. What is problematic with this assumption is that all further analysis will be based on the underspecified 75 truck trips per day. While this under estimation of the truck trips may get the project approved by the City; the city under Jan Perry has supported this project, it will have long negative impact on the residents of South Los Angeles. In the realm of Air Quality Health Risk Assessment the truck trips are further down estimated to 31 diesel fueled trucks per day. The Kleinfelder's Health Risk Analysis is faulty because it also assumes a degraded amount of truck trips per day; 75 truck trips per day. Regional Air Quality The air quality in Southern California does not meet the state and federal standards. The American Lung Association consistently gives Los Angeles County failing grades in the amount of ozone and particulate pollution in the air. Although smog levels are impacted by seasons and weather patterns, smog is visible in the air on most days. Online location of the 2015 DEIR: http://cityplanning.lacity.org/eir/4051SoAlamedaStProj/Index.pdf 2008 MND by Horowitz http://1drv.ms/1BiXQ2k, http://1drv.ms/1BiY6QM

E81-1

E81-2

E81-3

APPENDIX B

LADOT TRAFFIC STUDY POLICIES AND PROCEDURES

Traffic Study Policies and Procedures

August 2014

City of Los Angeles
Department of Transportation

http://ladot.lacity.org/



For comments or questions regarding the Traffic Study Policies and Procedures for the City of Los Angeles, please call LADOT's Development Services Division at (213) 972-8482 or (213) 972-8476.

This document may be reprinted and excerpts may be extracted without permission by LADOT. Changes to these policies may be revised or updated periodically and will be posted on the LADOT web site at:

http://ladot.lacity.org/WhatWeDo/ProjectDelivery/B-PermitTrafficStudies/index.htm

August 2014

TRAFFIC STUDY POLICIES AND PROCEDURES
TABLE OF CONTENTS

A. TRAFFIC STUDY REQUIREMENTS 5

B. TRAFFIC STUDY PREPARATION PROCESS 6

C. TRAFFIC COUNT REQUIREMENTS 7

D. CONGESTION MANAGEMENT PROGRAM GUIDELINES 8

E. FREEWAY IMPACT ANALYSIS SCREENING CRITERIA 8

F. TRIP GENERATION CALCULATIONS 9

G. PERFORMANCE MEASURES - LEVEL OF SERVICE 11

H. SIGNIFICANT IMPACT THRESHOLDS 15

I. TRANSPORTATION MITIGATION MEASURES 17

J. TRANSPORTATION DEMAND MANAGEMENT PROGRAM 23

K. NEIGHBORHOOD TRAFFIC MANAGEMENT PROGRAM 24

L. LADOT CONTACTS 25

ATTACHMENTS

"A" Acronyms
"B" Review Process for Traffic Study
"C" Driveway Design Guidelines
"D" Standard Street Dimensions
"E" Traffic Study Memorandum of Understanding
"F" Traffic Study Figures
"G" Traffic Study Checklist
"H" Sample Traffic Count
"I" Pass-by Trips
"J" Sample LOS Calculations
"K" Sample Mitigation Drawing
"L" Transportation Demand Management and Trip Reduction Measures (Ordinance 168,700 / LAMC 12.26-J)
"M" Development Review Fees (Ordinance No. 180,542 / LAMC 19.15)

INTRODUCTION

The purpose of these Traffic Study Policies and Procedures (TSPP) for the City of Los Angeles is to provide the public, private consultants and City staff with standards, guidelines, objectives and criteria to be used in the preparation of a traffic impact study. A primary objective of these policies is to ensure consistency in the preparation of traffic studies and in the planning of site access, on-site circulation, and off-site improvements for proposed land use development projects. This edition of the TSPP guides the preparation of traffic impact studies at a time when sustainability, smart growth, and the reduction of greenhouse gas emissions are prime concerns for the City - in addition to traditional mobility considerations.

A traffic study may be required of a development project due to environmental law or to City regulations, and its purpose is to predict and analyze the circulation and congestion impacts of project-generated traffic, and identify feasible mitigation measures. In this edition of the TSPP, added emphasis has been placed upon transportation demand management and multi-modal strategies, as reflected in the mitigation toolkit in Section I. This reflects the City policy trend away from automobile-centric solutions to shifting the focus on trip reduction strategies and on providing multi-modal solutions. It is strongly recommended that the applicant's traffic engineer consult with LADOT staff early in the design of the Project to ensure that traffic access and circulation issues are addressed, and to establish the scope and basic assumptions of the traffic impact study.

In order to ensure a timely review by LADOT, the following procedures and standards shall be followed in the preparation of a traffic study. It should be noted that these requirements will be updated from time to time and may differ in certain areas of the City that have specific plans or similar ordinances. You are encouraged to consult with LADOT staff before beginning a traffic study. See **Attachment A** for a list of the various acronyms used in this document.

NOTE: Fees for the various submittals and reviews described in this TSPP are listed in the Los Angeles Municipal Code (LAMC) Section 19.15 (Planning and Zoning Code).

A. TRAFFIC STUDY REQUIREMENTS

Upon submission of an application for discretionary action, the City of Los Angeles Department of Transportation (LADOT) will prepare an initial assessment of the project to determine if a technical memorandum or a traffic study is required. The thresholds for determining the appropriate transportation review process is as follows:

- A **Technical Memorandum** is required when the project is likely to add 25 to 42 a.m. or p.m. peak hour trips, and the adjacent intersection(s) are presently estimated to be operating at LOS E or F. The scope for preparing a technical memorandum, which is a significantly scaled-down version of a traffic study, must be reviewed and approved by LADOT. At a minimum, the potential impacts to intersections adjacent to the project should be evaluated. The technical memorandum shall be prepared under the direction of, and signed by, a Professional Engineer, registered in the State of California to practice either Traffic or Civil Engineering.

- A **Traffic Study** is required when the project is likely to add 43 or more a.m. or p.m. peak hour trips. Review of a traffic study is a nine-step process as shown in **Attachment B**. The traffic study must follow the study guidelines, as described herein, and shall be prepared under the direction of, and signed by, a Professional Engineer, registered in the State of California to practice either Traffic or Civil Engineering. Further, the Traffic Consultant must have a valid Los Angeles City Business Tax Registration Certificate.

Other requirements of a traffic study or a technical memorandum include:

- Compliance with the scoping process identified in Section B.

- Payment of any required processing fees for traffic assessment and review of a traffic study or technical memorandum.

- Submittal of the final electronic version of the traffic study or technical memorandum in portable document format (PDF) before LADOT issues their project impact assessment report.

Occasionally, LADOT will review a traffic study for a Project that is later modified or changed. If LADOT determines that the Project description has changed such that extensive and major revisions to the traffic study are required, then the revised Project shall be considered a new Project and a new traffic study and traffic review fee will be required. If LADOT determines that revisions to the traffic study can be accomplished without preparing a new traffic study, then LADOT will not require a new traffic study but may require the preparation of a technical memorandum and payment of a fee specific to technical memorandums or supplemental analyses.

Similarly, if, after comments are received from LADOT on the traffic study, there is no further written communication from the applicant or the Traffic Consultant on the status of the Project for one year or more, then LADOT will assume that the Project is no longer being pursued. To reinstate the project, a new traffic study and traffic review fee will be required and the environmental processing "clock" shall start again.

B. TRAFFIC STUDY PREPARATION PROCESS

Any applicant required to prepare a technical memorandum or traffic study for a development should follow the steps outlined below:

1. Contact LADOT to discuss the Project scope and to obtain approval on the assumptions and content of the technical memorandum or traffic study. The assumptions and content of the traffic study shall be in accordance with CEQA, the Los Angeles County CMP, any applicable Transportation Specific Plan (TSP), or other applicable laws or ordinances.

2. Provide a general description of the Project size (defined by square-footage by use and/or number of dwelling units), uses and heights of proposed new buildings and other structures to be remodeled and/or removed. Include any sequence of phased construction and any unusual conditions. Specify a building address, legal description and project title. For Projects that require the preparation of an EIR, the analysis should include project alternatives. For such projects, the LADOT assessment letter will be limited to summarizing the findings and requirements for the applicant's preferred project alternative or the alternative that generates the most peak period trips. Should the applicant request separate assessments for each alternative, then additional traffic study review fees may be required.

3. Submit a site plan to LADOT for preliminary discussion of the Project's driveway location(s), loading/unloading area, and parking scheme. The estimated distribution of Project trips must be according to any necessary turn prohibitions for the proposed driveways. Generally, final LADOT approval of driveway location(s) and parking scheme will be reviewed by LADOT's Citywide One-Stop Counter, or at the Valley or West Los Angeles Development Review Office (see Section L for contact information) as a clearance on the Project's building permit. In order to minimize and prevent last minute building design changes, the applicant should contact LADOT for driveway width and internal circulation requirements prior to the commencement of building or parking layout design efforts so that such traffic flow considerations are designed and incorporated early into the building and parking layout plans. The design of driveways requires approval by LADOT and the Bureau of Engineering. Please refer to the **Attachment C** for LADOT "Driveway Design" guidelines for additional information.

4. To the extent possible, projects should incorporate the use of existing alleys into the design of site access and circulation plans. The use of existing alleys should be used primarily for vehicular access, loading and service.

5. The study should reference the City's 2010 Bicycle Plan (see link below) that was adopted by the City Council on March 1, 2011. The Bicycle Plan should be reviewed to understand the goals, objectives and planned improvements. Consultation with LADOT Bicycle Program staff may be necessary to determine the implementation time frame of specific bicycle lane improvements.

   http://planning.lacity.org/cwd/gnlpln/transelt/NewBikePlan/Txt/LA%20CITY%20BICYCLE%20PLAN.pdf

6. Identify CMP intersections and other CMP requirements (see Section D).

7. Consult with other affected agencies or adjacent jurisdictions (i.e., Caltrans, L.A. County Public Works, other cities, transit agencies, etc.) to assure that all traffic-related concerns and issues that may result from the Project and may affect that agency are properly

addressed in the traffic study. If a traffic study includes the evaluation of an intersection or intersections in a neighboring city, then the traffic study methodology and impact thresholds of that city with jurisdiction over that intersection or intersections should be used to assess a project's impact.

8. Consult with the Bureau of Engineering and LADOT to determine any highway dedication and street improvement requirements, as well as requirements under the Americans with Disabilities Act (ADA). Please see **Attachment D** for "Standard Street Dimensions."

9. After paying the necessary fee per LAMC Section 19.15, sign a scoping memorandum of understanding (MOU) with LADOT on the agreed upon assumptions including study intersections, residential street segments and freeway segments; related projects; trip generation rates; ambient growth rate; trip distribution pattern and trip assignments; trip credits for existing active or previous land use; vehicle trip discounts for transit, internal or pass-by trips; projected buildout year and traffic study methodology. Please see **Attachment E** for a sample MOU.

10. If the project is expected to generate a significant number of regional trips, then the traffic study may be required to incorporate subregional travel demand simulation modeling software. The decision to require travel demand modeling shall be made by the Bureau Chief supervising the development review functions of the Department. These studies will be subject to LADOT's model calibration and validation standards.

11. The applicant shall keep LADOT informed on the progress made in completing the traffic study. LADOT approval is required on any changes to the executed MOU assumptions or any other changes made in the traffic analysis before the final report is prepared.

12. The review of a traffic study shall begin after the applicant has completed the scoping process and has paid any required fees to the City. The consultant shall also provide proof of possessing a valid Los Angeles City Business Tax Registration Certificate.

13. The traffic study should include the maps and figures identified in **Attachment F**.

14. LADOT will not release their project impact assessment report until all documents and items identified in **Attachment G** (including the entire traffic study in "pdf" format) are provided. Until then, the traffic study submittal will be deemed **incomplete**.

C. TRAFFIC COUNT REQUIREMENTS

When collecting turning movement data at the study intersections, manual traffic volume counts should be collected in 15-minute intervals during the hours of 7:00 a.m. to 10:00 a.m. and 3:00 p.m. to 6:00 p.m., unless LADOT specifies other hours (e.g., for a signal warrant determination or weekend analysis). These traffic counts should include vehicle classifications, pedestrian volume counts, and bicycle counts. The traffic study should not use any traffic counts that are more than two years old. Additionally, unless otherwise required, all traffic counts should generally be taken when local schools or colleges are in session, on days of good weather, on Tuesdays through Thursdays during non-Summer months, and should avoid being taken on weeks with a holiday. The data should be summarized and presented in the standard LADOT format depicting turning movement volumes as shown in **Attachment H**, and submitted in digital and hard copy formats.

If traffic count data is collected utilizing video technology equipment that is left unattended in the public right-of-way, then the appropriate LADOT Development Services Division staff (see Section L) should be notified prior to the installation of such equipment. Also, the video equipment should be clearly labeled to identify it as traffic counting equipment and to include the name and contact information of the company conducting the count (see sample label below).

TRAFFIC COUNTING EQUIPMENT

FOR INFORMATION CONTACT

(xxx) xxx-xxxx (Company Name)

D. CONGESTION MANAGEMENT PROGRAM (CMP) GUIDELINES

The "Congestion Management Program for Los Angeles County" includes guidelines intended to assist local agencies in evaluating impacts of land use projects on the CMP system through the preparation of a regional transportation impact analysis (TIA). Appendix "D" of the 2010 CMP for Los Angeles County identifies the requirements and outlines the guidelines in the preparation of the CMP transportation impact analysis. A CMP TIA is necessary for all projects required to prepare an Environmental Assessment based on local determination. The geographic area examined in the TIA must include, at a minimum, the following:

- All CMP arterial monitoring intersections, including freeway on and off-ramp intersections, where a proposed project is expected to add 50 or more trips during either the weekday a.m. or p.m. peak hours (of adjacent street traffic).

- Mainline freeway monitoring locations where a project is expected to add 150 or more trips, in either direction, during either the weekday a.m. or p.m. peak hours.

If, based on these criteria, the TIA does not identify any impacted regional facilities, then further CMP traffic analysis is not required. However, projects must still consider transit impacts (also per the 2010 CMP) and provide a calculation of CMP "credits" and "debits" for the project. For further information on the CMP TIA process, please call LADOT CMP Monitoring Section at (213) 972-8473.

E. FREEWAY IMPACT ANALYSIS SCREENING CRITERIA

Pursuant to the Freeway agreement executed in October 2013 between LADOT and Caltrans District 7, traffic studies may be required to conduct a focused freeway impact analysis in addition to the CMP analysis described above. If the proposed project meets any of the following criteria, the applicant will be directed to the Caltrans' Intergovernmental Review section for a determination on the need for analysis and, if necessary, the methodology to be utilized for a freeway impact analysis:

- The project's peak hour trips would result in a 1% or more increase to the freeway mainline capacity of a freeway segment operating at LOS E or F (based on an assumed capacity of 2,000 vehicles per hour per lane); or

- The project's peak hour trips would result in a 2% or more increase to the freeway mainline capacity of a freeway segment operating at LOS D (based on an assumed capacity of 2,000 vehicles per hour per lane); or

- The project's peak hour trips would result in a 1% or more increase to the capacity of a freeway off-ramp operating at LOS E or F (based on an assumed ramp capacity of 1,500 vehicles per hour per lane); or

- The project's peak hour trips would result in a 2% or more increase to the capacity of a freeway off-ramp operating at LOS D (based on an assumed ramp capacity of 1,500 vehicles per hour per lane).

All projects for which a traffic study is required should conduct a freeway impact screening analysis. The screening analysis should be submitted to LADOT during the preparation of the traffic study MOU and should include the project's trip generation and distribution estimates. Based on these estimates, the check shall also include a morning and afternoon peak hour project trip assignment to determine the amount of project traffic expected to be assigned to the freeway system. If one of the criteria listed above is met, the applicant will be directed to work with Caltrans and the traffic impact study may be required to include a freeway analysis beyond the requirements of Metro's CMP and based on the direction from Caltrans.

To assist in the evaluation of impacts on State facilities, the project's traffic consultant should refer to Caltrans' "Guide for the Preparation of Traffic Impact Studies" found at the following web site:

http://www.dot.ca.gov/hq/tpp/offices/ocp/igr_ceqa_files/tisguide.pdf

F. TRIP GENERATION CALCULATIONS

Any trip credits must be approved by LADOT during the scoping process and those trips must be included in existing base year traffic counts.

1. ITE Trip Generation Rates
   The latest edition of ITE's Trip Generation Handbook for trip generation rates and formulas should be used to estimate the Project's trip generation. However, if the Project is in a TSP area, then the procedures and trip rate identified in the TSP should be applied. If other rates are proposed, then these rates must first be submitted with the appropriate background survey data for approval by LADOT.

2. Unique Developments
   Unique types of development may require trip generation studies of similar facilities in order to establish a trip rate for use in the impact analysis. These developments may include land uses for which trip generation rates are not available in the ITE Trip Generation Handbook, or land uses for which the rates in the ITE Trip Generation Handbook are based on a small sample of surveyed sites. The procedures and the results of the trip generation studies must be approved by LADOT.

3. Existing Use

When estimating the Project's net new trips, any claim for trip credits for an "existing" active land use requires that the "existing" use is/was in place at the time of the base year traffic counts. Generally, for CEQA purposes this means the "existing" use must have been active for at least 6 months during the past 2 years. To fully ensure that "existing use" trip credit claims are validated by LADOT, supporting documentation (leasing agreements, utility bills, etc.) must be submitted. Documentation of any previous environmental review of the circulation impacts of the "existing" use should be included in this submittal. Note that some specific plan ordinances allow different time frames for the determination of existing use trip credits and of any applicable trip fees.

4. Terminated Land-Use

Any claim for trip credits for a previously terminated land use must be supported with appropriate documentation of the previous active use, such as copies of any building permit, certificate of occupancy, business license, lease agreement, affidavits, or photographs as well as documentation as to when the previous land use was terminated. Documentation of any previous environmental review of the circulation impacts of the terminated land use should also be submitted in support of such claims. The absence of documentation of previous environmental review may result in denial of the claim for trip credits.

5. Pass-by Trips

Any claim for "pass-by" trip credits must use the trip reduction rates in the "Pass-By Trip Rates" in **Attachment I**, which are based on rates published by ITE. However, these rates may be superseded by additional guidelines provided in specific plans or interim control ordinances. These rates are not applicable when reviewing impacts at Project driveways and at intersection(s) immediately adjacent to the Project site. **Pass-by trip credits shall not be used in determining the need for a traffic study**.

6. Transit Credit

LADOT encourages developers to design and construct transit-friendly projects that provide safe and walkable sidewalks to and from transit stations for project patrons. In line with the City policy to promote the use of transit and walking, LADOT, at its discretion, may allow up to a **25**% transit/walk trip credit subject to the following guidelines, on a case by case basis:

a. Developments above or adjacent to a Metro Rail, Metrolink, or Orange Line station, or to a similar dedicated transit line station with convenient pedestrian access to the station may qualify for up to **25**% transit credit. The actual credit provided should be determined by an analysis of the transit service frequency and density at the specified transit station.

b. Developments within a 1/4 mile walking distance of a transit station, or of a RapidBus stop, may qualify for up to a **15**% transit credit. The actual credit provided will be determined by an analysis of the transit service frequency and density at the specified transit station or RapidBus stop. To obtain the maximum credit, applicants should implement the following improvements listed in priority order:

- Provide a wider than standard sidewalk along the streets fronting the project through additional sidewalk easement or by dedicating additional right-of-way beyond street standards.
- Improve the condition and/or aesthetics of existing sidewalks leading to transit station(s) with adequate lighting to provide for a safer pedestrian

environment.

- Provide continuous paved sidewalks / walkways with adequate lighting from all buildings in the Project to nearby transit services and stops. This may include mid-block paseos.
- Implement transit shelter improvements/beautification.

c. If the development is not within 1/4 mile walking distance of a transit station or a RapidBus stop, the Project may still qualify for up to 10% transit credit. To obtain this credit, the Project should include specific features in its design that promote alternative travel modes and provide certain amenities to tenants and employees. Features and amenities that may qualify a Project for this credit include the following:

- An on-site transit information kiosk and/or on-site transit pass sales;
- On-site facilities such as ATM machines, cafeteria and convenience shopping;
- Charging for single occupant auto parking;
- Car share programs;
- Bicycle racks or other facilities on-site;
- Provision of on-site concierge service to facilitate use of transit, taxis, or private shuttles by employees/residents;
- Provision of shuttle service for employees and/or customers.

No trip generation credit will be given automatically to developments located in an area with infrequent transit service. However, all reasonable efforts by the developer to promote the use of mass-transit or walking will be considered for transit credit on a case by case basis.

NOTE: Refer to Section I of this TSPP for transit-related mitigation measures.

7. Affordable Housing Credit

Residential or mixed-use developments that include Affordable Housing Units [as defined in LAMC 12.22-A.25 (b)] qualify for a trip reduction credit of 5% on the basis of the percentage of total dwelling units reserved as affordable. A development for which all proposed dwelling units are to be affordable would receive the maximum aggregate credit of 5% (100 × 0.05). A development with 20% affordable units would qualify for a 1% aggregate trip credit (20 × 0.05), etc. Affordable Housing credit is allowed in addition to any Transit Credit granted through Section D.6 above.

G. PERFORMANCE MEASURES - LEVEL OF SERVICE

1. For land use development projects, the Transportation Research Board, Circular 212 Critical Movement Analysis (CMA) Planning Method, should be used to analyze traffic operating conditions at study intersection(s). CMA is a method that determines the volume to capacity (V/C) ratio on a critical lane basis and Level of Service (LOS) associated with each V/C ratio at a signalized intersection. V/C ratios are measured on a scale of 0 to 1.000. LOS describes the quality of traffic flow and is a measure of such factors as travel speed, travel time and flow interruptions. LOS range from "A" to "F" with LOS "A" representing excellent, free flow conditions and LOS "F" representing jammed, forced flow conditions. The following table (see page 12) provides a description of the different LOS's and associated V/C ratios.

2. LADOT has developed a CMA spreadsheet in MS-Excel format to estimate the LOS for study intersections. All traffic studies that require the use of CMA to estimate impacts should be prepared using this spreadsheet. A digital copy of the spreadsheet will be provided to firms preparing traffic studies in the City of Los Angeles. Please contact any of the LADOT sections identified in Section L for a copy of the LOS spreadsheet. Completed LOS calculations must be submitted to LADOT in digital format and included with the submittal of the traffic study. A typical sample of a LOS calculation worksheet is shown in **Attachment J**. For some intersections (such as a 5-legged intersection, diamond interchange, etc.), the V/C ratio may need to be calculated manually or may need to be adjusted accordingly. The appropriate methodology for these special cases should be discussed with the appropriate LADOT staff during the MOU scoping process.

3. The use of the Highway Capacity Manual's (HCM) delay-based methodology for signalized intersections is acceptable to LADOT for traffic impact studies associated with infrastructure projects, including transit, rail, bicycle and roadway improvements. In such cases, micro-simulation may also be necessary to fully understand the effects of the project in terms of queue lengths, traffic signal timing parameters, transit travel times, etc. The following table (see page 12) provides a description of the different LOS's and associated delays measured in terms of "delay per vehicle."

4. The intersection capacity at intersections along a congested corridor may need to be adjusted to account for reduced capacity due to gridlock, heavy pedestrian volumes, or other prevailing factors. The LOS spreadsheet developed by LADOT allows users to override the standard CMA capacities to account for these factors. However, any such revisions to the standard capacities or to any formula or function used in the LOS spreadsheet require LADOT approval.

5. Since the CMA and HCM methodologies and the resulting LOS is primarily an automobile-oriented measure, LADOT is evaluating other performance measures that can yield information related to other modes of travel. Doing so can provide useful information regarding the ability of a project or traffic mitigation measure to reduce vehicle-miles-traveled (VMT), to reduce green-house gas (GHG) emissions, and to promote other modes of travel. Although some traffic mitigation measures can provide a measurable reduction in VMT or GHG emissions, these measures may not show a quantifiable benefit when the performance measure is LOS. In these cases, the traffic study should include a description of the proposed improvement and the anticipated benefits to air quality. The traffic volume counts collected at the study intersections should also identify the volumes of pedestrians and bicycles that enter the intersection. These are helpful parameters and provide the necessary context when evaluating the overall operation of each intersection.

LEVEL OF SERVICE DEFINITIONS FOR SIGNALIZED INTERSECTIONS [1]

Level of Service	Volume/Capacity Ratio	Delay per Vehicle (sec / veh)	Definition
A	0.000 - 0.600	≤ 10	EXCELLENT. No vehicle waits longer than one red light and no approach phase is fully used.
B	0.601 - 0.700	> 10 - 20	VERY GOOD. An occasional approach phase is fully utilized; many drivers begin to feel somewhat restricted within groups of vehicles.
C	0.701 - 0.800	> 20 - 35	GOOD. Occasionally, drivers may have to wait through more than one red light; backups may develop behind turning vehicles.
D	0.801 - 0.900	> 35 – 55	FAIR. Delays may be substantial during portions of the rush hours, but enough lower volume periods occur to permit clearing of developing
E	0.901 - 1.000	> 55 – 80	POOR. Represents the most vehicles that intersection approaches can accommodate; may be long lines of waiting vehicles through several signal cycles.
F	Greater than 1.000	> 80	FAILURE. Backups from nearby intersections or on cross streets may restrict or prevent movement of vehicles out of the intersection approaches. Tremendous delays with continuously increasing queue lengths.

[1] Sources: Transportation Research Board, Interim Materials on Highway Capacity, Transportation Research Circular No. 212, January 1980; and Transportation Research Board, Highway Capacity Manual 2010.

5. V/C ratios should be calculated to three decimals, rounded and summarized in a table showing weekday a.m. and p.m. peak hour LOS at study intersections for existing conditions, existing with Project, future without Project, future with Project and future with Project plus mitigation. In a separate appendix, the traffic study shall include the detailed LOS worksheets for each study intersection. The table summarizing the results of the impact analysis should follow the format below:

(Year) **Existing Traffic Conditions**	**Existing Plus Project**	**Project Impact**	*(Buildout Year)* **Cumulative Base**[2]	*(Buildout Year)* **Project**[3]	**Project Impact**	*(Buildout Year)* **Project with Traffic Mitigation**	**Net Project Impact**
V/C LOS	V/C LOS		V/C LOS	V/C LOS		V/C LOS	

6. The LADOT traffic count database should be searched for any recent traffic counts at the study intersections. If recent LADOT traffic counts are not available, then new traffic counts shall be collected by a qualified data collection firm. Unless there are special circumstances, traffic volume counts that are more than two years old will not be accepted and new traffic counts should be collected.

7. The traffic study should include a map or table that illustrates the lane configurations and lane volumes for each study intersection. Also, any programmed and funded transportation improvements that are expected to be implemented on or before the project buildout year should be identified in the traffic study. Should these programmed improvements include a modification to the existing lane configuration to any of the study intersections, then the study should identify these changes and include the revised lane configuration in the V/C calculations for all future scenarios.

8. In determining the lane assignments for an intersection with an unmarked curb lane, the V/C/ calculations may assume the capacity of a functional right-turn only lane, provided that the lane width is a minimum of 18 feet wide, there are no bus stops at the approach, on-street parking would not impede vehicles turning right, the pedestrian volumes are low during the peak hour, and this de-facto right-turn operation has been verified in the field.

9. If necessary, the scope of the traffic impact analysis should be expanded to evaluate special circumstances, such as:

   - Summer weekend activity in recreational areas
   - University/school graduation ceremonies or events
   - Holidays or special events
   - Swing shifts
   - Developments with special visitor, employee or shopping hours or days
   - Alternative Project scenarios if required by another City Department or adjacent jurisdiction
   - Analysis of Freeway LOS

[2] The "cumulative base" scenario represents existing traffic conditions plus increases in traffic related to ambient growth and related projects

[3] The "project" scenario is the cumulative base scenario plus the Project trips

10. Should the traffic study include an analysis of freeway segments, then consultation with Caltrans is needed on the capacity analysis methodology used to evaluate state facilities.

11. When determining which intersections should be included in the impact analysis for development projects, only signalized intersections should be selected. Unsignalized intersections should be evaluated solely to determine the need for the installation of a traffic signal or other traffic control device, but will not be included in the impact analysis. When choosing which unsignalized intersections will be reviewed, intersections that are adjacent to the project or that are expected to be integral to the project's site access and circulation plan should be identified. For these intersections, the overall intersection delay should be measured pursuant to procedures accepted by LADOT during the scoping process. If, based on the estimated delay, the resultant LOS is E or F in the "future with Project" scenario, then the intersection should be evaluated for the potential installation of a new traffic signal. The study shall include a traffic signal warrant analysis prepared pursuant to Section 353 of LADOT's Manual of Policies and Procedures and submitted to LADOT for review and approval.

H. SIGNIFICANT IMPACT THRESHOLDS

1. A transportation impact at a signalized intersection shall be deemed "significant" in accordance with the following table except as otherwise specified in a TSP, ICO or CMP:

SIGNIFICANT TRANSPORTATION IMPACT *(V/C Methodology)*		
Level of Service	**Final V/C Ratio**	**Project-Related Increase In V/C**
C	> 0.701 - 0.800	equal to or greater than 0.040
D	> 0.801 - 0.900	equal to or greater than 0.020
E	> 0.901-1.000	equal to or greater than 0.010
F	Greater than 1.000	equal to or greater than 0.010

For purposes of this calculation, the "Final V/C Ratio" shall mean the future V/C ratio at an intersection considering impacts with project, ambient and related Project growth but without proposed traffic mitigation. "Project-Related Increase in V/C" shall mean the change in V/C between the future V/C ratio with Project, ambient and related project growth but without proposed traffic mitigation and the future V/C ratio with ambient and related project growth but without Project and proposed traffic mitigation.

2. When utilizing the HCM methodology for signalized intersections for transportation infrastructure projects, a transportation impact shall be deemed "significant" in accordance with the following table:

SIGNIFICANT TRANSPORTATION IMPACT *(Delay Methodology)*		
Level of Service	**Final Delay**	**Project-Related Increase In Delay**
C	> 20 - 35	equal to or greater than 6.0 seconds
D	> 35 – 55	equal to or greater than 4.0 seconds
E	> 55 – 80	equal to or greater than 2.5 seconds
F	> 80	equal to or greater than 2.5 seconds

For purposes of this calculation, the "Final Delay" shall mean the future delay per vehicle at an intersection considering impacts with project, ambient and related Project growth but without proposed traffic mitigation. "Project-Related Increase in Delay" shall mean the change in delay between the future delay with Project, ambient and related project growth but without proposed traffic mitigation and the future delay with ambient and related project growth but without Project and proposed traffic mitigation.

3. Commercial projects may be required to conduct residential street impact analysis. A local residential street can be potentially impacted based on an increase in the average daily traffic volumes. The objective of the residential street analysis is to determine the potential for cut-through traffic impacts on a residential street that can result from a Project. Cut-through trips are measured as vehicles that bypass a congested arterial or intersection by instead opting to travel along a residential street. To address these potential impacts, non-restrictive traffic calming measures should be considered and, if deemed warranted, implemented to off-set any anticipated impacts. Restrictive traffic calming measures should not be considered. See Section J for a description of restrictive and non-restrictive traffic calming measures. When selecting residential street segments for analysis during the traffic study scoping process, all of the following conditions must be present:

   - the proposed project is a non-residential development and not a school
   - the arterial is sufficiently congested, such that motorists traveling on the arterial may opt to divert to a parallel route through a residential street; the congestion level of the arterial can be determined based on the estimated LOS under project conditions of the study intersection(s); LOS E and F are considered to represent congested conditions
   - the Project is projected to add a significant amount of traffic to the congested arterial that can potentially shift to an alternative route; Project traffic would need to exceed the daily minimum significance thresholds listed below under “Project-Related Increase in ADT”
   - the local residential street(s) provides motorists with a viable alternative route

   A local residential street shall be deemed significantly impacted based on an increase in the projected average daily traffic (ADT) volumes as follows:

Projected ADT with Project (Final ADT)	Project-Related Increase In ADT
0 to 999	120 or more
1,000 to 1,999	12 percent or more of final ADT
2,000 or 2,999	10 percent or more of final ADT
3,000 or more	8 percent or more of final ADT

I. TRANSPORTATION MITIGATION MEASURES

When a Project is expected to result in significant traffic impacts, the Project's traffic consultant should meet with LADOT to discuss potential transportation mitigation options before submitting a traffic study. Different transportation mitigation solutions should be explored when attempting to mitigate a Project's significant traffic impact to a level of insignificance. However, since sustainability, smart growth and the reduction of greenhouse gas emissions have become prime concerns for the City in addition to traditional traffic flow considerations, mitigation programs should be developed to first focus on minimizing the demand for trips by single-occupant vehicles through trip reduction strategies or by encouraging other modes of travel like public transit and bicycling. Therefore, the following mitigation categories, listed in priority order, should be considered when evaluating and proposing transportation mitigations:

1. Transportation Demand Management Program (See Section J)
   All projects are required to comply with LAMC 12.26-J. For additional trip reduction credits as traffic mitigation, suggested elements of a TDM program should include, but not be limited to, the following elements:

   a. Implementation of vehicle trip reduction incentives and services for Project employees and/or tenants; provide on-site education on alternative transportation modes.

   b. Implementation of flexible / alternative work schedules and telecommuting programs.

   c. Provide a bicycle and pedestrian-friendly environment; provide bicycle amenities such as secure bicycle racks, lockers and showers for employees.

   d. Provide bicycle parking beyond the requirements of the Bicycle Parking Ordinance No. 182,386.

   e. Enhance the environment for bicycling such as consolidating driveways and improving pavement conditions;

   f. Financial contribution to the City's Bicycle Plan Trust Fund.

g. Implement a Bicycle Friendly Street improvement as identified in the Bicycle Plan; such improvements can include curb extensions, wayfinding signage, diverters, bicycle loop detection, shared lane markings, etc.

h. Conduct educational workshops for Project employees and/or tenants related to the usage of bicycles on streets including how to integrate bicycles use with transit use and how to ride next to vehicles.

i. Provide bicycle repair stations for use by Project employees and/or tenants.

j. Provide fully or significantly subsidized transit passes to Project residents and/or employees.

k. Implementation of first and last mile solutions that can increase the use of transit by bridging the gap between transit stops/stations and a commuter's origin or final destination

l. Implementation of a parking cash-out program.

m. Pursuant to Internal Revenue Code Section 132(f), arrange pre-tax dollar transit commute expense accounts to provide transportation fringe benefits to eligible employees.

n. Vehicle trip reduction incentives and services affecting visitors to the project, such as shoppers, clients, patrons, etc.

o. Financial support for the capital and/or operating costs of enhanced transit or vanpool service to the project.

p. Provision of a variety (mixed use) of land uses in close proximity, facilitating trip making by walking, cycling or local shuttles.

q. Provision of on-site facilities that encourage the use of alternate forms of transportation such as bicycle lanes and amenities, enhanced pedestrian connections, telecommuting facilities, etc.

r. Include site trip cap and/or parking cap in trip monitoring agreements.

An initial draft performance-based TDM Program, prepared as outlined in Section J, must be included in the traffic study for any Project seeking TDM trip reduction credits. If the TDM Program is acceptable to LADOT, the applicant will be allowed to reduce the total Project trips by an amount determined to be commensurate with the measures proposed in the TDM Program.

2. Transit Capacity and Access Improvements

The elements listed below should be considered when developing transit system strategies. The exact mitigation value shall be determined on the basis of the development's size, type of use(s), and the frequency / density of transit service in the vicinity of the Project.

a. Contribution of funds or equipment to increase the capacity of existing transit systems (must be coordinated with transit providers)

b. Transit shuttles provided by applicant (e.g., bus, taxicab, van, etc.)

c. Contributions toward construction or enhancement of transit stations or centers

d. Provision of facilities or equipment which expedite transit flow (e.g., transit priority signal systems, HOV lanes, etc.)

e. Contributions toward operation/maintenance costs and/or fleet vehicle replacement costs of existing transit service (must be coordinated with providers)

3. Parking Management Measures

a. Contribution of equipment or funds to implement intelligent parking systems, which can include the use of new parking meter technology, vehicle sensors, dynamic signage, a central management system and a real time parking guidance system. Such upgrades should be implemented along appropriate City block faces with existing parking meter zones in the vicinity of the development, or at all approaches and departures of an impacted intersection.

b. "Unbundling" of parking spaces in multiple unit residential development, e.g., parking shall be bought or rented separately when the dwelling units are initially bought or rented, enabling discounts for not using parking spaces and/or complementing Flex Car or other car sharing programs.

c. "Unbundling" of parking spaces in non-residential development, e.g., employee parking is not to be provided free-of-charge and/or parking costs are listed as a separate line item in lease agreements. This would be a necessary component of a Parking Cash-Out program.

4. Jobs / Housing Balance Measures

A trip reduction mitigation value of up to 10% may be approved for a development that incorporates Work Force housing (dwelling units affordable to, and reserved for, sale to Low and Moderate Income persons/families as defined in CA Health and Safety Code Section 50093 who are employed at the development) or which constructs such housing within a one-half mile of the development. The exact mitigation value shall be determined based upon an analysis of the development size and type of land use, employment type/density, and the number of Work Force housing units to be provided. The affordability of the Work Force housing units must be guaranteed for a minimum period of thirty (30) years.

5. Traffic Signal Operational Improvements

Traffic signal enhancements that include, but are not limited to, traffic signal phasing modifications, new signal installations, signal controller upgrades, CCTV camera installations, additional vehicle detector loops, etc., may be considered and provided as traffic mitigation or as supplemental measures to proposed intersection mitigations. Signal improvements that are considered project-serving or that provide access to the project are not considered traffic mitigations.

6. Street Widening and Other Physical Improvements

Recommended improvements must be demonstrated to be physically feasible and must meet minimum City standards. If a physical mitigation measure is proposed on a future "bicycle lane" street (see "Designated Bikeways" in Appendix D of the Bicycle Plan), then the

mitigation should be designed to accommodate the future bicycle lane. Please see **Attachment K** for a sample intersection mitigation drawing. Particular attention shall be paid to resultant sidewalk widths, which should remain adequate for pedestrian activities and meet ADA requirements.

7. Street Re-striping and Parking Prohibitions
Generally, street re-striping is not a preferred mitigation measure because it often requires parking prohibitions which may cause secondary impacts in certain commercial and residential areas. Therefore, any parking impacts should be clearly identified through a parking inventory and demand analysis. This analysis should include proposed measures to mitigate any such impacts to the extent feasible. Additionally, should the mitigation require the permanent removal of a parking meter space, payment to LADOT for lost parking meter revenues is required. The current average annual revenue generated by one parking meter is $1,000. Therefore, based on this average, the removal of each metered, on-street parking space will require payment to LADOT in the amount of the average annual revenue over a ten year period (currently estimated at $10,000 per space).

8. Fair Share Contributions
If a traffic study demonstrates that the applicant is responsible for only a portion of a large and costly transportation enhancement, such as a bridge or roadway widening project, a fair share contribution toward the cost of the improvement may be an acceptable mitigation. Fair share contributions are applicable in those cases where there are other proposed developments in the vicinity that may also contribute toward the cost of the improvement.

9. TSP Mitigation Trust Fund
If project is located in a TSP area, an applicant may be required to pay "trip fees" into a mitigation trust fund for implementation of larger regional projects that are specified in the TSP.

10. Infeasible Mitigation Measures
The traffic study should also include a discussion of mitigation measures deemed to be infeasible, as appropriate, to record the reason(s) for rejecting these measures.

11. Substitute Mitigations
When no feasible mitigation measure is available, LADOT at its discretion may accept a substitute mitigation measure at an adjacent intersection provided that appropriate technical analysis is prepared to show the benefit at the impacted intersection.

12. Unmitigated Impacts
For projects with unmitigated traffic impacts that seek a Statement of Overriding Considerations, other suitable enhancements should be evaluated and considered that would address quality-of-life issues like implementing non-restrictive traffic calming measures, traffic safety enhancements, traffic signal timing upgrades, and community streetscape features like lighting, landscaping, shade, sidewalk repairs, etc. Such improvements, whether voluntary or required, that benefit the community can serve to off-set the significant impacts of a project. Also, when no other mitigation measures are available and the Project results in unmitigated impacts, the developer should consider revising and reducing the scope of the project.

The adequacy and feasibility of each mitigation measure must be determined to the satisfaction of LADOT. The final required mitigation measures for the project will be determined by the appropriate

decision maker (e.g., the City Planning Commission, the City Council). All mitigation measures shall comply with the following requirements:

1. Plan Preparation for Physical Mitigation

   a. Existing Conditions

      i. Prepare preliminary geometric design drawing to a scale 1" = 40' for each of the significantly impacted intersections for existing conditions, where restriping and/or street widening is a proposed mitigation measure. Make field investigations and show all important roadway details, including adjacent land use(s), parking restrictions, sidewalks, driveways, lane dimensions, roadway striping, curb and right-of-way lines, and "footprints" of building line.

      ii. Use existing LADOT drawings where available and field check for accuracy to reflect current conditions.

      iii. Provide copy of current City Bureau of Engineering District Map illustrating public rights-of-way on impacted streets.

   b. Future Conditions with Mitigation

      i. Prepare preliminary geometric design drawing to a scale of 1" = 40' showing recommended changes in striping including additional roadway and right-of-way necessary to mitigate the significant impact(s) of the project for each location where street restriping and/or street widening is a proposed mitigation measure.

      ii. Plans showing striping modifications should include adequate segments of the roadway (approximately 300-400 feet on each leg of the intersection) to indicate the appropriate transitions from the existing striping.

   c. Standards

      Geometric plans shall be prepared on LADOT 24" × 36" standard sheets. If more than one mitigation is possible at a given location, separate plans for each alternate mitigation measure may be prepared in consultation with LADOT. Mitigation design drawings that are processed through the B-permit process should be submitted to the LADOT Design Division in Auto-Cad format. The following criteria and standards should be used in preparation of plans:

      i. Drawings of street improvements must show existing and proposed dimensions for:

         - Roadway widths
         - Right-of-way widths
         - Sidewalk widths
         - Curb radii
         - Location of traffic islands
         - Individual lane widths
         - Striping "tapers" and "cat-tracks"

ii. Items to be shown on plans:

- Parking restrictions (existing and proposed), bus stops (existing and relocated), driveways, signals, street lights, signs, trees, utility poles and catchment basins.
- Type of development of adjacent properties.

iii. Drawings of street improvements must show existing and proposed dimensions (typical dimensions are shown below). Increased widths may be required for special circumstances such as predominant use by trucks and buses, higher design speeds, higher pedestrian volumes, etc.

- Through lane = 10' - 11'
- Left turn lane or two-way left-turn median = 10' - 11'
- Right turn lane = 12'
- Lane adjacent to curbed median = 12'
- Curb lane without parking = 12' - 13'
- Curb lane with parking = 18' (low speed) to 20' (high speed)
- Bike lane without parking = 5' - 6'
- Bike lane with parking = 13'

Note that modified street standards have been adopted for Downtown Los Angeles and the Hollywood Community Plan area which differ from the City's Standard Plan of Street Dimensions.

d. Submit 3 copies of any proposed mitigation plans with the traffic study to the appropriate LADOT Planning Office for review and comment by LADOT's Planning Office, District Office, and Design Division.

e. Attach the a.m. and p.m. peak hour lane volume diagram with the geometric design plan for each intersection.

f. Revise mitigation plans as required and re-submit the final mitigation plans to LADOT for approval.

2. Guarantees of Mitigation Measures

All physical transportation mitigations and associated traffic signal work within the City must be guaranteed through the B-Permit process of the Bureau of Engineering, prior to the issuance of any building permit and completed prior to the issuance of any certificate of occupancy. Temporary certificates of occupancy may be granted in the event of any delay through no fault of the applicant, provided that, in each case, the applicant has demonstrated reasonable efforts and due diligence to the satisfaction of LADOT. All improvements along state highways and freeway ramps require approval from Caltrans. An encroachment permit must be obtained from Caltrans for these improvements before the issuance of any building permits.

In the event the originally proposed mitigation measure becomes infeasible, a substitute mitigation measure may be provided subject to approval by LADOT or other governing agency with jurisdiction over the location, upon demonstration that the substitute measure is equivalent or superior to the original measure in mitigating the project's significant impact.

3. Mitigation Monitoring Program in Draft EIR's

The necessary components of each mitigation measure in a mitigation monitoring program should be stated separately for inclusion in the Draft EIR. These include:

a. Identification of the responsible agency for monitoring the measure and the designated coordination for all participants

b. Qualifications, if any, of the necessary monitor(s)

c. The proposed schedule of the mitigation monitoring (i.e., dates of start-up, observation period, frequency, and completion/termination) - this should be stated for physical mitigation measures required during construction as well as those that are for the operation/life of the project (e.g., TDM program)

d. Sampling techniques and testing procedures to be used

e. Equipment and materials needed

f. Funding required and sources of funding for monitoring activities by both project and City personnel (especially for long-term monitoring activities)

If the City adopts a Citywide Mitigation Monitoring Program, the components of the mitigation monitoring plan will be modified accordingly.

J. TRANSPORTATION DEMAND MANAGEMENT (TDM) PROGRAM

TDM is a program designed to facilitate the use of alternate transportation modes to decrease dependency on single occupancy vehicles. LADOT strongly encourages the development of a comprehensive TDM program to eliminate as many new project trips as possible. LAMC 12.26-J (which applies only to construction of new, non-residential development in excess of 25,000 square feet gross floor area) requires, prior to issuance of a building permit, that the owner or applicant agree, by way of a covenant that runs with the land, to provide and maintain minimal TDM measures. LAMC 12.26-J is summarized in **Attachment L**.

LAMC 12.26-J notwithstanding, a consultant may be required to prepare a more comprehensive, integrated program of TDM measures. If TDM, Transit, and/or Parking Management strategies are claimed as a mitigation of project-related traffic impacts, or if required under any applicable TSP or other City ordinances, then the TDM program shall include the following elements:

- Statement of measurable goals to be achieved
- Estimate of trips to be reduced
- Key elements of the program
- Schedule and responsibilities for implementation
- Identification of funding responsibilities
- Method of monitoring program performance
- Contingency plan and/or penalties for failure to achieve goals

If vehicle trips will be reduced by operating or contributing to the operation of transit systems, a description of the transit program as well as a letter of support from the related transit service

provider is required. The transit program shall contain elements similar to the TDM program described above. If the project is a mixed-use project that includes housing, LADOT will consider reducing the project's trip generation to account for the internal trip characteristics of the project. This credit will be limited to the trips that would be affected by the special features of the project relative to ITE or TSP trip generation rates. If the project site is under one ownership or control; is uniquely located so as to permit accurate monitoring of all site trips; and extraordinary trip reduction goals are proposed, LADOT may recommend a trip cap agreement. Such an agreement typically places a cap on the total vehicle trips entering and leaving the site during peak hours and includes a monitoring and contingency plan.

K. RESIDENTIAL NEIGHBORHOOD TRAFFIC MANAGEMENT PROGRAM

If the traffic study indicates that the project may potentially result in residential street impacts, then a plan to reduce project traffic from traveling through nearby residential areas may be required as part of the mitigation program for the project. If neighborhood traffic management (NTM) measures are required to off-set potential residential street impacts, then, prior to project occupancy, the applicant shall conduct public outreach and develop a NTM plan, in consultation with LADOT, the affected Council District office and the affected neighborhood. Coordination with the appropriate Council District office may be necessary to designate the stakeholders that should facilitate the public outreach. The applicant shall also be responsible for conducting the engineering evaluation of the potential measures to determine the feasibility in regards to drainage, constructability, street design, etc. The applicant shall also be responsible in implementing any NTM measures approved by LADOT and supported by stakeholders. Prior to the outreach, a cost estimate on the potential NTM plan shall be determined in consultation with LADOT. The cost should be commensurate with the size of the project and with the level of residential street impacts that are expected. The development of the plan shall include the analysis of any relevant traffic data, roadway characteristics and conditions of the impacted residential street segments identified in the study.

The NTM plan should focus solely on implementing non-restrictive traffic calming, which may include, but are not limited to, traffic circles, speed humps, roadway narrowing effects (raised medians, traffic chokers, etc.), landscaping features, roadway striping changes, and stop sign pattern. Restrictive measures such as turn restrictions, physical barriers, signal metering, etc., should not be considered since these measures can potentially lead to the diversion of traffic from one street to another, or one neighborhood to another. The NTM plan should also consider and evaluate neighborhood improvements that can offset the effects of added traffic, including street trees, sidewalks, landscaping, neighborhood identification features, and pedestrian amenities. Such measures can support trip reduction efforts by encouraging walking, bicycling, and the use of public transit. As with other mitigation measures, any required NTM measures on City streets must be implemented prior to the issuance of any certificates of occupancy. A temporary certificate of occupancy may be granted in the event of any delay through no fault of the applicant, provided that the applicant has demonstrated reasonable efforts and due diligence to the satisfaction of LADOT. The NTM plan shall be prepared in conformance with the guidelines established by LADOT and should contain, at a minimum, the following elements:

- Description of existing facilities and neighborhood traffic conditions
- Description of proposed neighborhood traffic controls, including sketches of specific street modifications
- Analysis of any change in existing or future traffic patterns as a result of implementation of the plan
- Implementation and monitoring program

L. LADOT CONTACTS

Thank you for your cooperation. If you have any questions, please call the appropriate LADOT Development Services Division office as follows:

- Metro Development Review
  100 S. Main Street, 9th Floor
  Los Angeles, CA 90012
  (213) 972-8482 or (213) 972-8481
  Fax (213) 972-8418
  Coverage area includes all areas south of Mulholland Drive, east of Robertson Boulevard and north of the San Pedro Community Plan area.

- West Los Angeles Development Review
  7166 W. Manchester Avenue
  Los Angeles, CA 90045
  (213) 485-1062
  Fax (213) 485-1285
  Coverage area includes San Pedro and all areas south of Mulholland Drive and west of Robertson Boulevard

- Valley Development Review
  6262 Van Nuys Boulevard, 3rd Floor
  Van Nuys, CA 91401
  (818) 374-4699
  FAX (818) 374-4696
  Coverage area includes the entire San Fernando Valley north of Mulholland Drive

- LADOT City-wide One-Stop Counter
  201 N. Figueroa Street, 4th Floor
  Los Angeles, CA 90012
  (213) 482-7024

ATTACHMENT A

ACRONYMS

ADA	Americans with Disabilities Act
ADT	Average Daily Traffic
AQMD	Air Quality Management District (SCAQMD)
ATCS	Adaptive Traffic Control System
ATSAC	Automated Traffic Surveillance and Control
AVR	Average Vehicle Ridership
BOE	Bureau of Engineering
CALTRANS	California Department of Transportation
CEQA	California Environmental Quality Act
CMA	Critical Movement Analysis
CMP	Congestion Management Program
CRA	Community Redevelopment Agency
DCP	Department of City Planning
DEIR	Draft Environmental Impact Report
EIR	Environmental Impact Report
ICO	Interim Control Ordinance
ITE	Institute of Transportation Engineers
LADOT	Los Angeles Department of Transportation
LACMTA	Los Angeles County Metropolitan Transportation Authority
LAMC	Los Angeles Municipal Code
LOS	Level of Service
MOU	Memorandum of Understanding
NOP	Notice of Preparation
NTM	Neighborhood Traffic Management
SCAG	Southern California Association of Governments
TDM	Transportation Demand Management
TIA	Traffic Impact Analysis
TSM	Traffic System Management
TSP	Transportation Specific Plan
VMT	Vehicle Miles Traveled
V/C	Volume to Capacity Ratio

ATTACHMENT B

LADOT REVIEW PROCESS FOR TRAFFIC STUDY

STEP	
1	Preliminary discussion with Consultant/Developer on project description including site plan
2	Scoping of Traffic Study with the consultant
3	Consultant and LADOT execute an MOU (fees may apply per LAMC 19.15)
4	Consultant/Developer pays review fee and submits Traffic Study
5	LADOT prepares initial comments on the traffic study, if necessary
6	Consultant submits corrections/revisions to the traffic study, if necessary
7	LADOT prepares initial comments on proposed mitigation measures, if necessary
8	Consultant submits corrections/revisions on proposed mitigation measures, if necessary, and electronic copy of traffic study
9	LADOT issues an assessment letter

I. Purpose

This Section provides the basic criteria for review of driveway designs.

The Department of Transportation (DOT) has a broad responsibility to ensure the safe and efficient use of City streets. The impact on streets is influenced by the design and use of off-street parking and loading facilities to accept and discharge vehicles. The goal of good driveway design is to minimize adverse effects on street traffic.

II. Conditions of Tracts or Other Actions

DOT requirements of driveways, prohibitions of driveways on certain streets, limitations of turning movements, and other conditions are often imposed through:

A. Zone Changes: These requirements usually originate in DOT during the zoning review process and are adopted by the Council.

B. Conditional Uses: Hearing examiners obtain the recommendations of DOT and often include traffic requirements.

C. Tract Review: All Tract maps are subject to approval by the Advisory Agency (i.e., a deputy of the Director of Planning). The Advisory Agency is assisted by the Subdivision Committee, on which DOT is represented. The Advisory Agency frequently includes traffic requirements in its final determination.

It is necessary in many cases to "clear" these traffic requirements, i.e., certify that they have been carried out. This is done by DOT's representative on the Subdivision Committee, who must approve any plans affected by such requirements.

III. Code Requirements

The Los Angeles Municipal Code (LAMC) specifically requires DOT to carry out certain functions with relation to off-street parking facilities. The Bureau of Transportation Programs and Development Review of the Department serves as a review agency for driveways and other off-street uses through the required approval of Building Permit Applications. Relevant Municipal Code Sections are:

12.21 A-4(g)
12.21 A-5(e)
12.21 A-5(i)
12.21 A-5(j)
12.21 C-6(a)

See Appendix C for further information.

IV. Definitions

For purposes of this Section, certain terms and words are defined as follows:

A. Arterial Highway - A street that either:

1. Accommodates 10,000 or more vpd (vehicle trips per typical weekday), or
2. Is designated as a Major or Secondary Highway on the City's Highways and Freeways Plan.

B. Collector Street - A street that either:

1. Accommodates more than 1500 but less than 10,000 vpd, or
2. Is a designated Collector Street on the applicable Community Plan.

V. Driveway Location Planning

The basic principle of driveway location planning is to minimize possible conflicts between users of the parking facility and users of the abutting street system. The public interest requires optimum capacity of streets and highways to carry traffic with minimum potential for traffic accidents. The safety of pedestrians is also considered.

This calls for the minimum number of driveways, consistent with street and lot capacity, located on streets with the least traffic volume, when there is a choice. Driveways should provide high-entry capacity from the abutting street. To determine if a facility will meet the desired criteria, it is necessary to check location of driveways, size of driveways, number of driveways, operation and design of entrances and exits, and internal circulation.

A. Number of Driveways Along Arterial Frontage

Driveways should not be permitted along arterial highways where the proposed development is:

1. Residential, and access is possible using an alley or non-arterial street, or
2. Industrial or commercial, and
   a. At the intersection of the arterial highway with a non-arterial street, and
   b. Access is possible along the non-arterial frontage.

Otherwise the maximum number of driveways along arterial frontage should be:

Maximum Number of Driveways Along Arterial Frontage	
FRONTAGE (FEET)	NO. OF DRIVEWAYS
0 to 200	1[1]
200+ to 400	2

For every additional 400 feet of frontage, 1 additional driveway is allowed. However, for minimum distance between driveways see Sub-Section V.D. Exceptions may be granted by the Transportation Engineer in charge based on review of specific project design or capacity needs (see Appendix A).

B. Location of Driveways Adjacent to Intersections

Driveways should be located such that two-way left turn lane channelization will provide storage space for left-turn entry, and for refuge for left-turn exiting. Where the arterial does not have two-way left turn lane median channelization, the driveway should be as far from the intersecting street as possible.

Driveways on arterial highways serving lots with frontages greater than 250 feet should not be placed within 150 feet of the adjacent street. Driveways on collector or local streets serving lots with frontages greater than 250 feet should not be placed within 75 feet of the adjacent street.

Turning prohibitions should be considered on approvals whenever the following would occur and an alternate ingress/egress point is not available:

a) Entering vehicles would need to make left-turns from the number one thorough lane of an arterial highway.

b) Exiting vehicles making left-turns to an arterial highway would be required to turn through the queue from adjacent signalized intersections and the exiting vehicle would cross a left-turn lane or on an unchannelized street from within 150 of the crosswalk at the signal.

c) When the proposed driveway causes a signalized T-intersection to become a left-jogged intersection and the proposed driveway becomes the right-jogged jog, the exiting driveway vehicles making left-turn movements shall be prohibited unless a new design for the newly-formed left-jogged intersection will signalize both jogged legs.

Where alternate access does not exist for a proposed driveway, turn restrictions may be considered, as authorized by the Transportation Engineer of the appropriate district office of the Transportation Engineer of the Signal Systems and Research Section.

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[1] Two driveways may be approved if they are to each be one-way (i.e. one ingress only and one egress only).

Modifications to channelization to make proposed driveway locations acceptable shall be paid for by the permittee requesting the change, prior to approval of the permit. Such modifications shall be approved by the Transportation Engineer of the appropriate district office.

C. Driveways at Tee Intersections

Driveways for properties at the top of a "T" intersection are to be centered within one foot of the prolongation of the terminating street center line. The driveway at the top of the T-intersection should be a Case 3 type driveway in a residential area, and a Case 4 type driveway in a commercial area (see attached Department of Public Works Standard Plan No. S-440-3). Where this is not possible, the driveway should conform to Sub-Section V.B (Location of Driveways Adjacent to Intersections).

D. Distance between Driveways

Wherever possible, two-way driveways should be separated by a minimum of 50 feet of full height curb to minimize conflict between vehicles using the adjoining driveways.

VI. Driveway Design

A. Basic Principles

Driveways should be designed to minimize possible conflicts between users of parking facilities and users of abutting street systems. The design should address pedestrian safety, sight distance, width of the lane from which the right turns into the driveway are made (i.e. 12 foot curb lane requires a wider driveway), size and turning characteristics of vehicles using the driveway (i.e. delivery trucks require wider driveways), complexity of vehicular movements, density of traffic on the abutting street (traffic and street width), speed of vehicles on the abutting street, arrival or departure rate of vehicles using the driveway, and any other considerations that would affect the safety and efficient use of City streets. It should be recognized that driveway design recommendations may vary depending upon site constraints, location, and usage. Existing driveways can be approved as constructed if the project which has necessitated their review is of limited scope or is re-striping only.

B. Width of Driveways

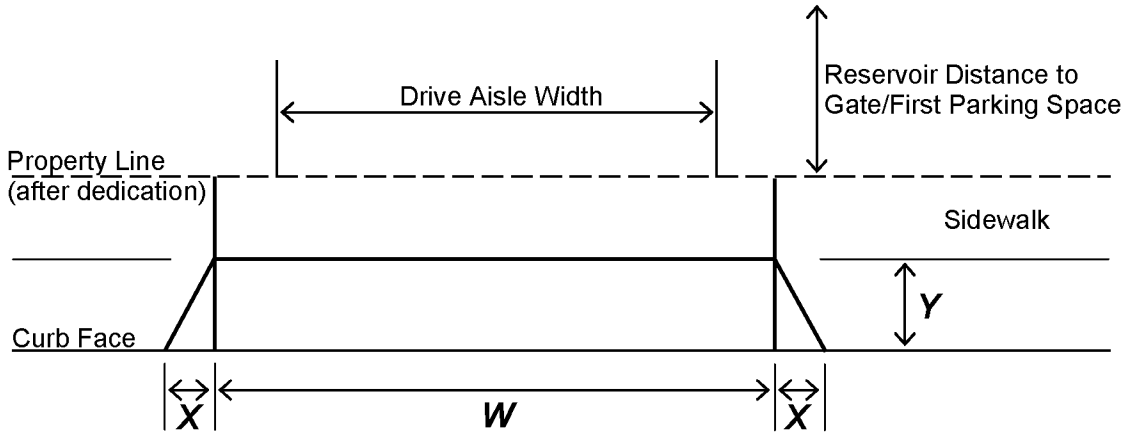
Not withstanding existing Code requirements, the following driveway widths are recommended:

Recommended Widths of Driveways
(*W* dimension of driveway apron, in feet)[2]

Type of Development	Two-Way	One-Way
Commercial	30 ft	16 ft
Industrial	30 ft	16 ft
Single Family Residential		
1 or 2 car garage	18 ft	–
3 or more car garage	26 ft	–
Multi-Family Residential		
More than 25 spaces	30 ft	16 ft
5 to 25 spaces	28 ft	16 ft
Less than 5 spaces	18 ft	16 ft

These recommended widths assume standard passenger vehicles turning right from an 18 foot wide curb lane under typical conditions. Wider driveways may be appropriate to accommodate large commercial vehicles or multiple entry lanes. Shorter driveway widths may be considered where it may be more appropriate to use narrower driveway or field conditions preclude use of recommended widths.

When larger vehicles and trucks are going to be the predominant users of a particular driveway, turning templates shall be utilized to develop a driveway width that can safely and expeditiously accommodate the prevalent type of ingress and egress traffic.



[2] See attached Department of Public Works Standard Plan No. S-440-3.

Driveway widths (*W* dimension) are intended to facilitate turning movements such that vehicles entering and exiting do not interfere with one another. The *W* dimension will commonly be larger than the on-site aisle width. This allows vehicles to enter from or to curb lanes without interfering with one another or hitting the *X* (sloping) portion of the curb.

C. Street-Type Driveways

Where a large parking facility is being constructed with signalized access along an arterial highway, a street-type driveway (i.e. having curb returns instead of sloping sides) with full height curb returns approximately 25 feet in radii will be required if the expected peak volume exceeds 250 cars per hour or 50 trucks per hour[3] or a traffic signal with normal signal operation is designed for the driveway. Standard driveway design may be used for driveways with signal flashing red operations. All new traffic signals must be warranted and approved by the Bureau of Traffic Management of DOT.

D. One-Way Driveways

One-way driveways should be permitted only if one-way-only usage is assured by:

1. Angled parking stalls, or

2. Other positive control (e.g. tire spikes or mechanical gate).

E. Reservoir and Maneuvering Space

Any entrance driveway from an arterial highway should provide reservoir space between the back of the sidewalk and the first parking stall.

Minimum Clear Reservoir Distance (feet)

Total Spaces	Reservoir
Up to 100	20
101 to 300	40
More than 300	60

Where more than 300 parking spaces are provided or where ticket dispensers and/or mechanical gates are used, the reservoir should be based upon calculated "traffic intensity" for each street access (see Appendices A & B). Gates or guard booths should be set back far enough from the back of the sidewalk to ensure that entering or exiting vehicles will not block sidewalk, signalized crosswalks or extend into street. The reservoir distance between the driveway approach limit lines and gates/or guard booths should provide sufficient vehicle storage space for traffic queuing during the duration of red indication, if the driveway is controlled by a traffic signal with normal operations.

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[3] Decisions require concurrence by Bureau of Engineering, Department of Public Works.

F. Each parking space, parking area, or loading area should be located such that vehicle maneuvers can be accomplished without driving onto the public right-of-way, except an alley.

G. Drive-up service windows should be designed as drive-out-only facilities with adequate storage off-street to accommodate waiting vehicles. Reservoir space should be based upon calculated "traffic intensity".

VII. Internal Circulation

LAMC Section 12.21 A-5 (j) (see Appendix C) provides authority for DOT review of the Internal Circulation. "All portions of a public parking area or public garage shall be accessible to all other portions thereof without requiring the use of any public street, unless the Department of Transportation determines that such use is not detrimental to the flow of traffic." The purpose of this section is to prevent (or control) the use of public streets for circulating between one part of a parking facility and another. Exceptions to this policy:

A. Residential Parking Areas – Parking areas for occupants of residential buildings are not "public," therefore, this section is not applicable to residential parking areas. Parking areas for visitors to residential buildings, however, are public. LAMC (Section 12.03).

B. Off-site Parking Facilities – LAMC Section 12.21 A-4(g) (see Appendix C) permits the provision of parking facilities within a certain distance of the building site. This provides that off-site parking facilities may be separated by public streets. However, each such facility should conform to the internal circulation test.

C. Employee Parking – Some parking for industrial or commercial facilities may be assigned (by a note on the building plans) "for use by employees only". However, in approving an exception, care should be taken to ensure that parking spaces are assigned and that the facility is not likely to be used for parking by customers or other visitors.

Parking stalls shall not be designed so that a vehicle is required to back out onto any public street or sidewalk. Parking stalls that serve two dwelling units or less with driveway access that is not from a major or secondary highway are exempt from this restriction. (LAMC Section 12.21 A-5 (i), see Appendix C)

VIII. Loading Docks

In the review of plans for driveways or parking facilities, DOT also reviews the design, location, and adequacy of truck loading docks.

Back-in or back-out loading facilities should not be permitted along arterial highways or collector streets. It is the policy of this Department to approve only those designs which entirely remove loading operations from these classification of streets.

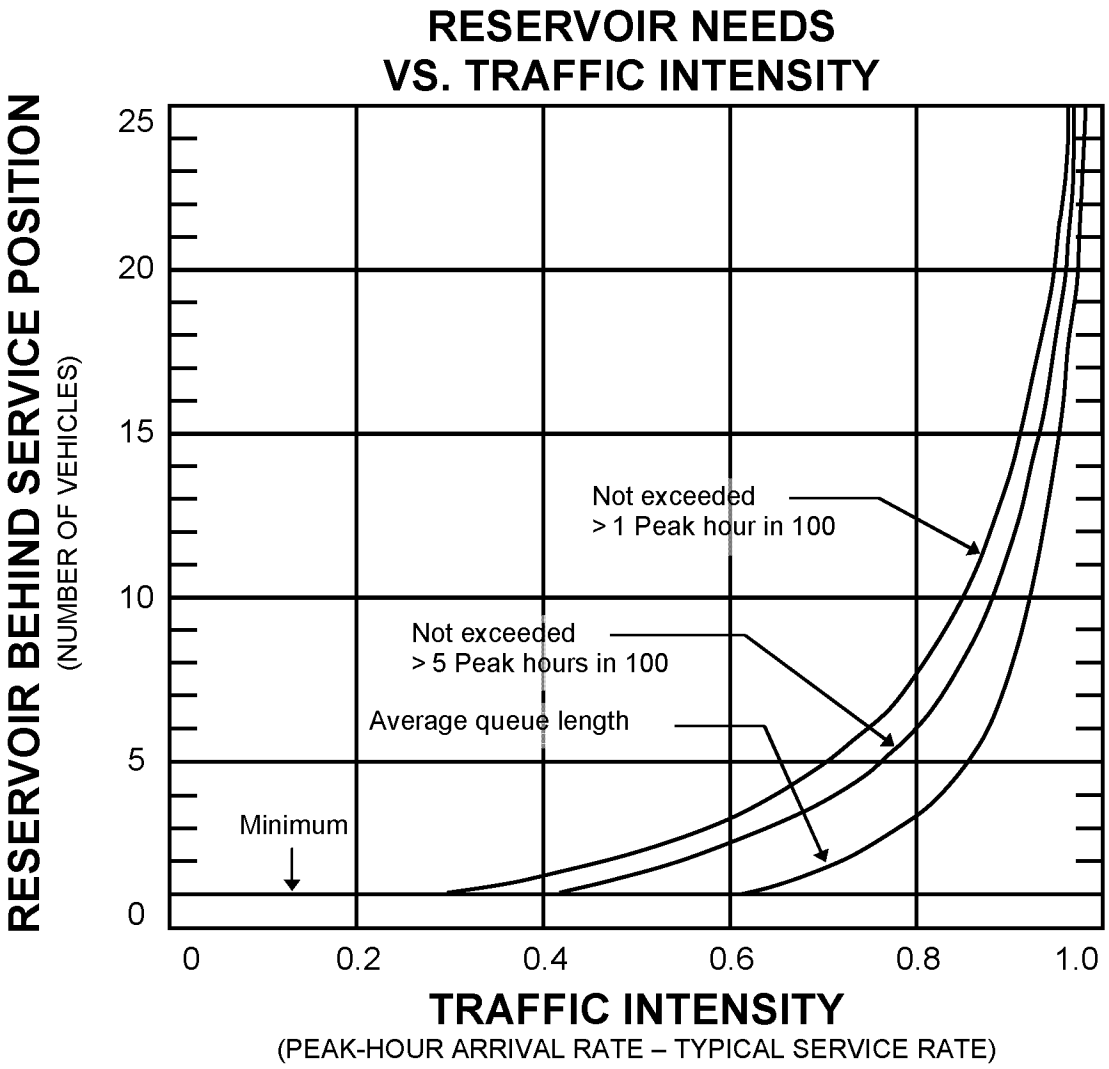
Back-in loading facilities may be permitted on commercially-developed local streets if off-street space is insufficient for truck maneuvering. These back-in loading facilities should have a minimum reservoir area of 45 feet back of sidewalk. If all or a portion of the back-in loading facility is within a building, the reservoir area should be depressed to prevent other use of the reservoir space.

APPENDIX A – PARKING CONTROL SERVICE RATE

Type of Control	Typical Service Rates Per Lane[4] Average Headway (Sec/Veh)	Capacity (Veh/Hr)
Entering:		
Clear aisle, no control	3.6	1,000
Ticket dispenser, no gate	5.0	720
Time stamp and handed to driver	8.5	425
Coded-card operated gate	8.9	405
Cashier, flat fee, no gate		
No information given	9.2	390
Direction-info needed	14.8	250
Ticket dispenser with gate		
Sharp turn @ approach	9.5	380
Easy direct approach	5.5	650
Coin-operated gate	20.4	175
Internal:		
Clear aisle or ramp, no parking	2.0	1,800
Straight ramp w/bend @ end	2.2	1,650
Circular ramp, 30´ R @ C/L	2.2	1,650
Aisle with adjacent 9´ x 18´ stalls		
Inbound	3.5	1,040
Outbound	8.6	420
Exiting:		
Light street congestion	7.2	500
Moderate street congestion	9.0	400
Coded card/token-operated gate	9.0	400
Cashier, flat fee with gate	13.4	270
Cashier, variable fee with gate	19.5	185
Coin operated gate	20.4	175

[4] Assumes no significant interference by pedestrians, other traffic, etc.

APPENDIX B



Assumptions: Arrivals follow a Poisson Distribution.
Service rate can be represented by an exponential probability function.
Flow is equally divided between each line if more than one if available.

Notes:

1. To obtain total reservoir length, use 20 feet per vehicle + 20 feet for the service position (or 12 feet to the driver of the vehicle in the service position).
2. For peak-hour arrival rate contact City-Wide Planning Coordination Section at (213) 482-7024.
3. See Appendix A for parking control service rate.

APPENDIX C – LOS ANGELES MUNICIPAL CODE REFERENCES

1. Section 12.21 A-4(g) Location of Parking Area. The automobile parking spaces required by paragraphs (b), (c), (d), and (e) hereof, shall be provided either on the same lot as the use for which they are intended to serve or on another lot not more than 750 feet distant therefrom; said distance to be measured horizontally along the streets between two lots, expect that where the parking area is located adjacent to an alley, public walk or private easement which is easily useable for pedestrian travel between the parking area and the use it is to serve, the 750-foot distance may be measured along said alley, walk or easement (Amended by Ord. No. 145,088, Eff. 10/20/73.)

2. Section 12.21 A-5(e) Driveway Location. Access driveways to every parking area and garage shall be designated in accordance with Section 62.105.1, 62.105.2, 62.105.3 and 62.105.4 for this Code, and in a manner to provide the minimum practical interference with the use of adjacent property and with pedestrian or vehicular traffic.

   Such driveways shall be located in accordance with a plan approved by the Department of Building and Safety in the following instances:

   a. On a lot in a "P" (including any combination with an "A" or "R" Zone) or "PB" Zone.

   b. For every parking area and garage having a capacity of more than 25 automobiles or trucks.

   The Department of Building and Safety shall disapprove any plan which it determines fails to meet the standards established by this Paragraph.

3. Section 12.21 A-5(i) Parking stall Location. Each automobile parking stall shall be so located that:

   a. No automobile is required to back onto any public street or sidewalk to leave the parking stall, parking bay or driveway, except where such parking stalls, parking bays or driveways serve not more than two dwelling units and where the driveway access is to a street other than a major or secondary highway. (Amended by Ord. No. 151,608, Eff. 11/27/78.)

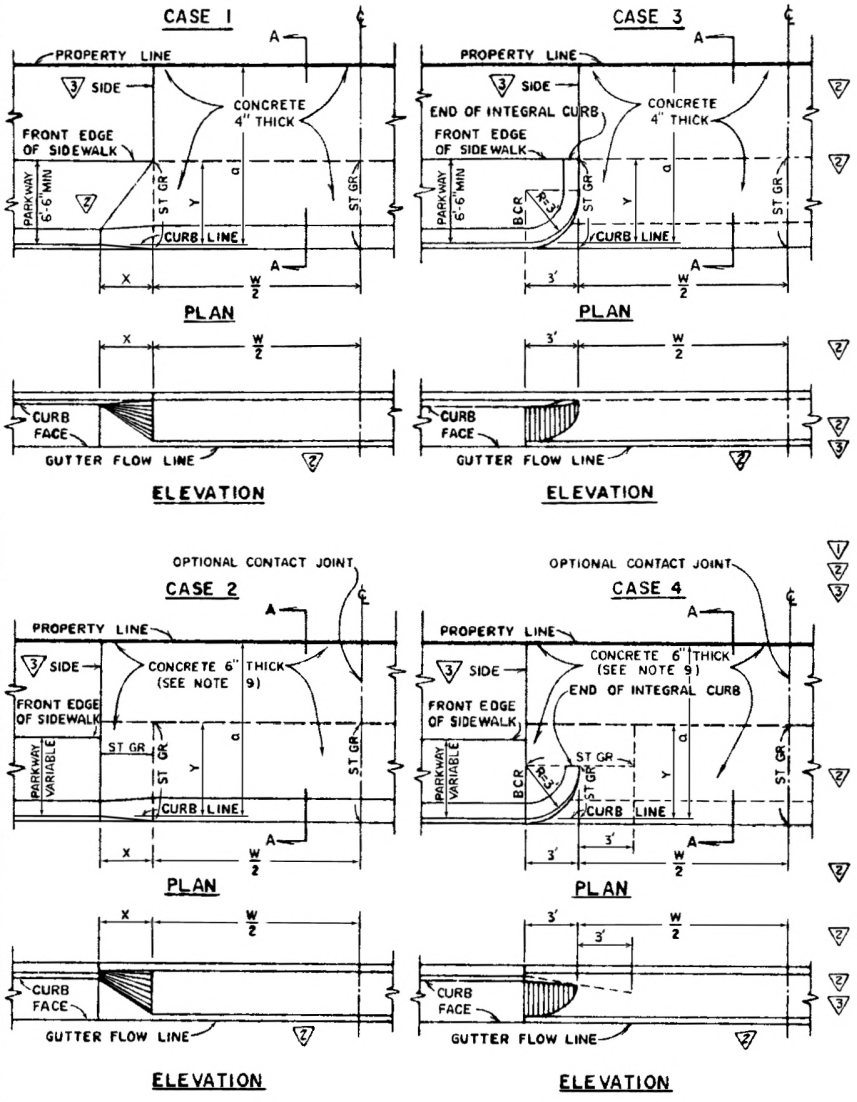
   b. Parking maneuvers can be accomplished without driving onto that portion of a required front yard where driveways are prohibited. Car stops or other barriers shall be provided in accordance with Section 12.21 A-6. (Amended by Ord. No. 144,082, Eff. 12/11/72.)

4. Section 12.21 A-5(j) Internal Circulation. All portions of a public parking area or public garage shall be accessible to all other portions thereof without requiring the use of any public street, unless the Department of Transportation determines that such use is not detrimental to the flow of traffic. (Amended by Ord. No. 152,425, Eff. 6/29/79.)

5. Section 12.21 C-6(a) Loading Space. A loading space shall be provided and maintained on the same lot with every hospital, hotel, or institution building. A loading space shall be provided and maintained on the same lot with every building in the "C" or "M" Zones, where the lot on which said building is located abuts an alley, provided that when the lot is occupied by a use, such as a service station or drive-in business, in which the building covers less than

the total buildable area, a suitable loading space must be provided, but it need not comply with all the provisions of this section if its location, size and means of access are approved by the Department of Building and Safety.

EXCEPTION: No loading space shall be required on a lot that abuts an alley in the “C” or “M” Zones when all the buildings are erected, structurally altered, enlarged, or maintained and used solely as dwellings or apartment houses and the total number of dwelling units on the lot does not exceed 20. (Amended by Ord. No. 138,685, Eff. 7/10/69.)



NOTES

1. ALL WORK SHALL BE CONSTRUCTED IN ACCORDANCE WITH THE LATEST STANDARD SPECIFICATIONS.
2. CASE 2 SHALL BE USED IN MOST CIRCUMSTANCES EXCEPT THAT CASE 1 MAY BE USED TO SERVICE R-1 OR R-2 PROPERTY PROVIDED THE "Y" SLOPE DOES NOT ENCROACH INTO THE SIDEWALK.
3. CASE 3 OR 4 SHALL BE USED IN LIEU OF CASE 1 OR CASE 2 RESPECTIVELY TO PRECLUDE THE FOLLOWING CONDITIONS.
   A. A DISTANCE OF LESS THAN 5 FEET BETWEEN A PROPOSED TOP OF "X" AND THE CENTER LINE OF AN ELECTROLIER OR FIRE HYDRANT.
   B. TRAFFIC SIGNALS, UTILITY POLES AND SIGN POSTS IN THE "X" AREA OF A PROPOSED DRIVEWAY.
4. WHERE CASE 3 OR 4 IS USED, AN ELECTROLIER OR HYDRANT SHALL NOT BE CLOSER THAN 1'-6" FROM THE BC, AND A TRAFFIC SIGNAL, UTILITY POLE OR SIGN POST SHALL NOT BE CLOSER THAN THE BC.
5. WHERE THERE IS EXISTING INTEGRAL CONCRETE CURB AND GUTTER, BOTH CURB AND GUTTER MUST BE REMOVED. OPTIONAL, IF THE GUTTER IS IN GOOD CONDITION, THE GUTTER MAY BE SAW CUT 4 INCHES TO 6 INCHES FROM THE FLOW LINE AND THE OUTSIDE PORTION LEFT IN PLACE, PROVIDING THAT IT IS NOT LESS THAN 18 INCHES.
6. PLASTIC CONTROL WEAKENED-PLANE JOINTS SHALL BE INSTALLED AT BOTH SIDES OF A DRIVEWAY AND AT APPROXIMATELY 10' INTERVALS WITHIN THE DRIVEWAY. WHERE THE DISTANCE BETWEEN THE SIDES OF THE DRIVEWAY DOES NOT EXCEED 15', AN INTERMEDIATE WEAKENED-PLANE JOINT WILL NOT BE REQUIRED.
7. THE AREA INCLUDED WITHIN THE "X" AND "Y" SLOPES (INCLUDING TOP OF CURB) WITHIN DRIVEWAY SHALL BE FINISHED WITH A WOOD FLOAT. THE BALANCE OF THE DRIVEWAY SHALL BE FINISHED IN ACCORDANCE WITH THE LATEST SPECIFICATIONS FOR SIDEWALK.
8. SECTION B MAY BE USED WHEN A DRIVEWAY WHICH SERVICES R-1 OR R-2 PROPERTY JOINS EXISTING SIDEWALK IN GOOD CONDITION AND THERE IS ADEQUATE "Y" DISTANCE BETWEEN CURB AND EDGE OF SIDEWALK.
9. A "t" OF 4-INCHES MAY BE USED FOR CASE 2 AND 4 DRIVEWAYS SERVING NOT MORE THAN FOUR DWELLING UNITS.
10. FOR THE "W" WIDTH OF DRIVEWAYS, SEE SECTION 62.105.2 OF THE LOS ANGELES MUNICIPAL CODE.
11. CURB FACE FOR DRIVEWAY DEPRESSION SHALL BE 3/4-INCH.

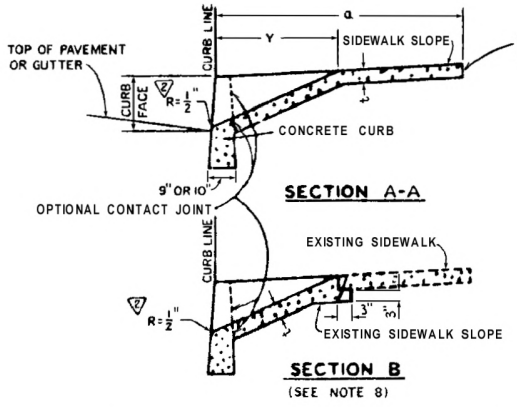


TABLE OF "X" & "Y" DIMENSIONS *

CURB FACE (INCHES)			6 OR LESS	7	8	9	10	11	12 OR MORE
CASE 1 t = 4"	(FEET)	X	3						
		Y	$6\frac{1}{2}$			9	10	11	12
CASE 2 t = 6"	(FEET)	X	3	$3\frac{1}{2}$	4	$4\frac{1}{2}$	5	$5\frac{1}{2}$	6
		Y	6	7	8	9	10	11	12

*UNLESS OTHERWISE APPROVED BY THE ENGINEER

DEPARTMENT OF PUBLIC WORKS

BUREAU OF ENGINEERING — CITY OF LOS ANGELES

DRIVEWAYS

STANDARD PLAN S-440-3

SUBMITTED March 197_

APPROVED 197_

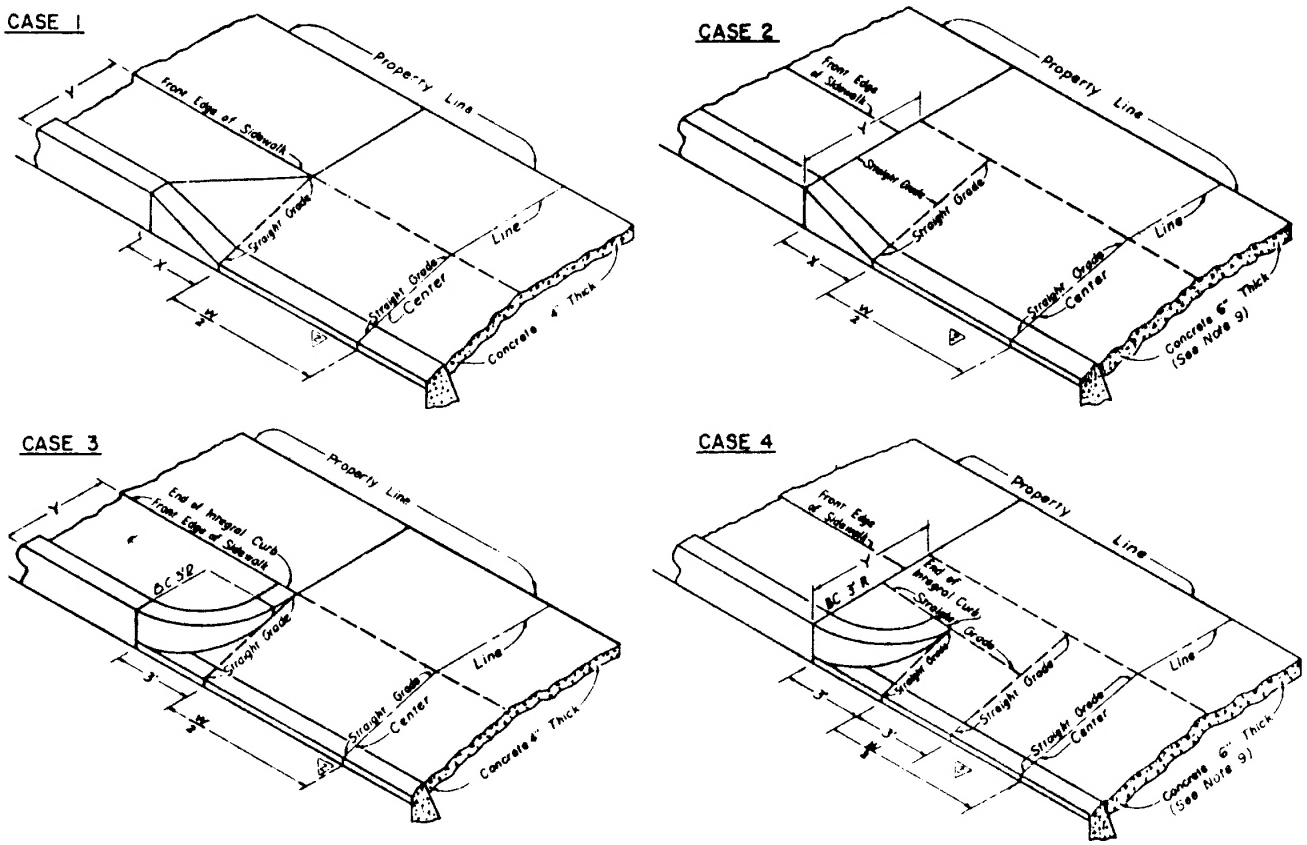
DESIGNED BY WDT | DRAWN BY | CHECKED BY SS

REVISIONS				
NO	DATE	DESCRIPTION	DIV ENG'R	CITY ENG'R
1	11-19-71	PLASTIC CONTROL JOINTS NOTE NO 6		
2	7-31-74	REVISED NOTES REMOVED DIMENSION AT CURB FACE AND ELECTROLIER		
3	7-29-76	REVISED NOTES NO 5, 6 & 11 ADD THE WORD "SIDE"		

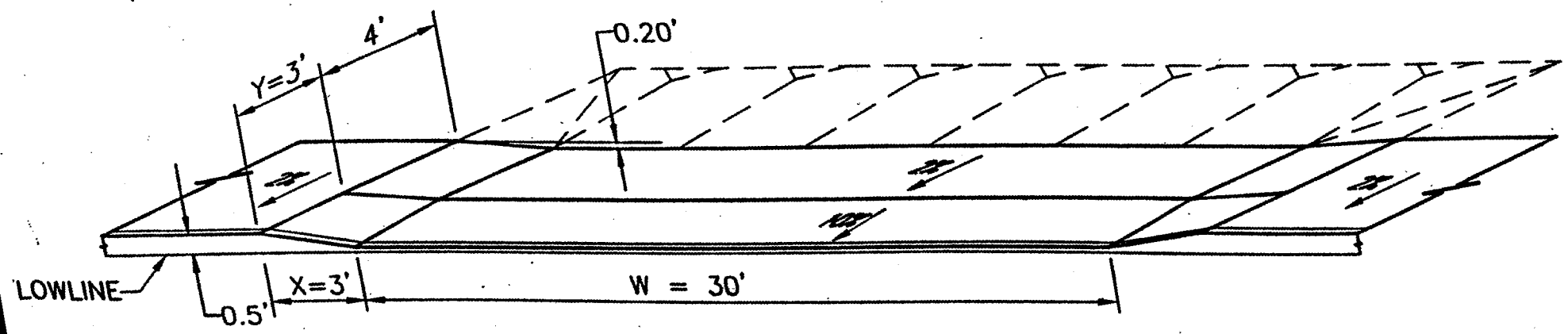
SUPERSEDES	REFERENCES
D-14817 B-3788 B-3799 B-3815	

VAULT INDEX NUMBER B-3890

SHEET 1 OF 2 SHEETS



STANDARD PLAN NO. S-440-3 VAULT INDEX NUMBER 8-3890 SHEET 2 OF 2 SHEETS



DRIVEWAY DETAIL

N.T.S.

SAMPLE

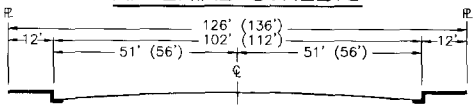
CASE II DRIVEWAY

From

Building & Safety Standard Plan No. S-440-3

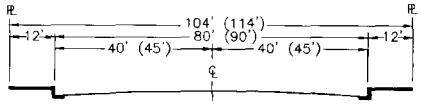
ATTACHMENT D

ARTERIAL STREETS



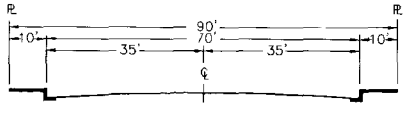
MAJOR HIGHWAY—CLASS I

At intersections with other Major Highways, the larger widths shown in parentheses should be provided, as determined by LADOT, utilizing a Standard Flare Section.



MAJOR HIGHWAY—CLASS II

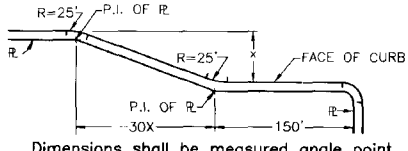
At intersections where LADOT has determined that dual left turn lanes are required, the larger widths shown in parentheses shall be provided, utilizing a Standard Flare Section.



SECONDARY HIGHWAY

TRANSITIONAL EXTENSIONS

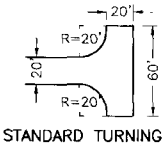
Where a designated Major Highway (Class I or II) or a Secondary Highway crosses another designated arterial street and then changes in designation to a street of lesser standard width, the street of lesser standard width shall be widened on both sides from the intersection to the width of the higher designation and tapered in a Standard Flare Section, as shown below, to provide on orderly transition.



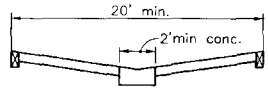
Dimensions shall be measured angle point to angle point.

STANDARD FLARE SECTION
(Plan View)

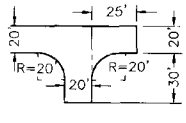
ALLEYS



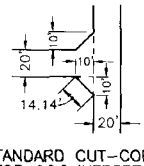
STANDARD TURNING AREA
(Plan View)



STANDARD CROSS-SECTION



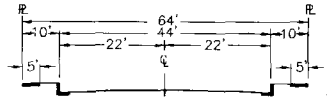
MINIMUM TURNING AREA
(Plan View)



STANDARD CUT-CORNERS
FOR 90° INTERSECTION
(Plan View)

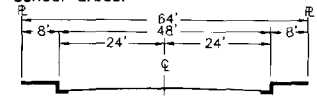
NOTE: Dimensions shown hereon are not to scale.

NON-ARTERIAL STREETS



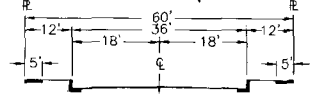
COLLECTOR STREET

For use in quarter mile streets and school areas.



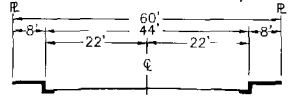
INDUSTRIAL COLLECTOR STREET

For use in industrial areas to assist the flow of local truck traffic within those areas to adjacent arterial streets. A 35' curb return radius is required.



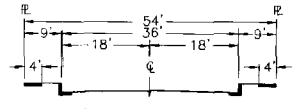
LOCAL STREET

In commercial and multiple residential areas, a 40-foot roadway with 10-foot parkways, and full-width sidewalks shall be required.



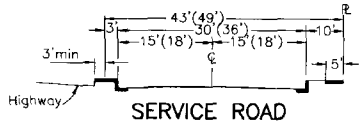
INDUSTRIAL LOCAL STREET

For use in industrial areas. A 35' curb return radius is required.



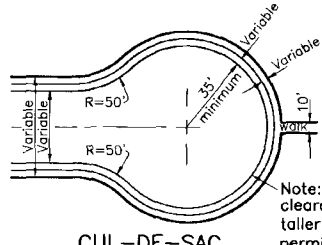
NONCONTINUOUS LOCAL STREET

May include cul-de-sac, loop streets and short connector streets. Where an approved internal pedestrian system is provided the parkway on one side may be reduced to 3-feet.



SERVICE ROAD

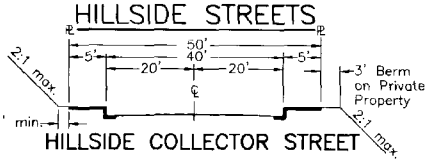
For use on adjoining major or secondary highways, except that the larger widths shown in parentheses shall be provided in multiple residential zones.



CUL-DE-SAC
(Plan View)
MAY BE UNSYMMETRICAL

Note: For fire truck clearance, no obstruction taller than 6" shall be permitted within 3 ft. of the curb. On-street parking shall be prohibited.

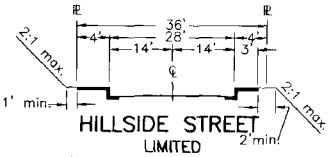
HILLSIDE STREETS



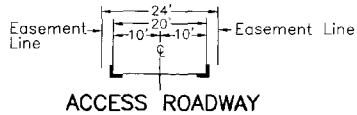
HILLSIDE COLLECTOR STREET



HILLSIDE STREET
LOCAL

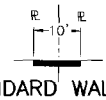


HILLSIDE STREET
LIMITED
(Parking on one side only)



ACCESS ROADWAY
CONDITIONAL

(Limited to 4 dwelling units, and a maximum length of 300 feet. Private Street only)



STANDARD WALKWAY
CROSS - SECTION

PREPARED IN COOPERATION WITH THE DEPARTMENTS OF TRANSPORTATION AND CITY PLANNING

BUREAU OF ENGINEERING — DEPARTMENT OF PUBLIC WORKS — CITY OF LOS ANGELES

STANDARD STREET DIMENSIONS

STANDARD PLAN S-470-0

SUBMITTED March 5, 1999
Clark W. Robins
ENGINEER OF DESIGN
DEPUTY ENGINEER

APPROVED March 31, 1999
Thomas Connor
CITY ENGINEER

DESIGNED BY	DRAWN BY	CHECKED BY
M.F.D., D.L.F., J.E.F., A.D.R.	R. TANABE	L. GANAJA

REGISTERED PROFESSIONAL ENGINEER — THOMAS K. CONNER — NO. 23788 — EXP. 12/31/2001 — CIVIL — STATE OF CALIFORNIA

APPROVED Frances Banajee 4.6.99
GENERAL MANAGER, DEPT. OF TRANSPORTATION DATE

Cousilowe 4/6/99
DIRECTOR OF PLANNING DATE

ADOPTED MAY 13, 1999
CITY PLANNING COMISSION DATE

SUPERSEDES	REFERENCES
D-22549	

VAULT INDEX NUMBER
B-4428

SHEET 1 OF 2 SHEETS

BUREAU OF ENGINEERING — CITY OF LOS ANGELES — FOUNDED 1781 — OFFICIAL RECORD

THIS STANDARD PLAN BECOMES EFFECTIVE ON NOVEMBER 10, 1999

STANDARD STREET CONDITIONS

1. City Council may, by ordinance, adopt specific standards for individual streets which differ from these official standard street dimensions. Community Plans should be reviewed for designation of Pedestrian Priority Street Segments of arterial streets which would require wider sidewalks than those indicated on this Standard Plan.

2. Sidewalk widths for non-arterial streets shall be the minimum shown hereon. Greater widths, up to full width between curb and property line, with tree wells, shall be required where commercial and multiple residential frontage, schools, areas of heavy pedestrian traffic or other special circumstances indicate the need.

3. Except for special conditions or as otherwise provided, sidewalk shall be placed as close to the property line as possible.

4. Where sidewalk is constructed adjacent to the curb it shall have a minimum width of 10 feet inclusive of curb thickness except for hillside streets, noncontinuous local streets and industrial streets.

5. Where sidewalk is constructed on the fill or low side of a hillside street, a berm may be required on private property.

6. Easements may be required in addition to the widths shown hereon, where necessary for the installation of public utilities or for widened sidewalks (minimum 15-foot width) adjacent to transit stations.

7. Fifty-foot curb radii (instead of the standard 35' curb radii) shall be provided for cul-de-sacs in industrial areas.

8. Private street development should conform to the standard public street dimensions shown on this sheet, where appropriate. Variations may be approved on a case-by-case basis.

9. For intersections of streets the following dedications shall apply:
   a. Intersections of arterial streets with any other street: 15'x15' cut corner OR 20' curved corner radius.
   b. Intersections of non-arterial and/or hillside streets: 10'x10' cut corner OR 15' curved corner radius.

10. Hillside Collector Streets. In hillside areas where topography or other environmental considerations, documented to the satisfaction of the City Engineer, would render full street improvements infeasible, the roadway width of the hillside collector street may be reduced to no less than 32 feet, provided that parking is limited to one side only.

BUREAU OF ENGINEERING
OFFICIAL RECORD

STANDARD PLAN NO. S-470-0	VAULT INDEX NUMBER B-4428	SHEET 2 OF 2 SHEETS

ATTACHMENT E - TRAFFIC STUDY MEMORANDUM OF UNDERSTANDING (MOU)

This MOU acknowledges that the traffic study for the following project will be prepared in accordance with the latest version of LADOT's Traffic Study Policies and Procedures:

Project Name:_____

Project Address:_____

Project Description:_____

Geographic Distribution: N _____ % S _____ % E _____ % W _____ %

Attach graphic illustrating project trip distribution percentages at the studied intersections

Trip Generation Rate(s): ITE 9th Edition / Other _____
Attach trip generation table with a description of the proposed land uses, ITE rates, estimated morning and afternoon peak hour volumes (ins/outs/totals), proposed trip credits, etc.

	in	out	total
AM Trips	_____	_____	_____
PM Trips	_____	_____	_____

Project Buildout Year: _____ Ambient or CMP Growth Rate: _____ % Per Yr.
Related Projects: (to be researched by the consultant and approved by LADOT)

Subject to Freeway Impact Analysis in addition to CMP Analysis: ___YES ___NO
(freeway analysis screening filter should be included in this MOU; selecting "yes" implies that at least one criteria was satisfied)

Study Intersections
(Subject to LADOT revision after initial impact analysis)

1.	6.
2.	7.
3.	8.
4.	9.
5.	10.

Trip Credits: (Exact amount of credit subject to approval by LADOT)

	Yes	No
Transit Usage		
Transportation Demand Management		
Existing Active Land Use		
Previous Land Use		
Internal Trip		
Pass-By Trip		

	Consultant	Developer
Name	_____	_____
Address	_____	_____
Phone No.	_____	_____
E-Mail	_____	_____

Approved by: _____ _____
Consultant's Representative Date LADOT Representative Date

ATTACHMENT F

TRAFFIC STUDY MAPS AND FIGURES

The traffic study should include the following maps unless otherwise specified during the scoping process:

1. Area map showing Project location.

2. Area map showing location of related projects (table should be included indicating location, size, name, description and trip generation of each related project).

3. Site map showing study intersections and distance of the Project driveway(s) from the adjacent intersections. Include location and identification of all major buildings, driveways, parking areas and loading docks of the Project.

4. Map(s) showing the "existing" (specify base year) traffic volumes for both the a.m. and p.m. peak hours at the study intersections and the average daily traffic (ADT) on any analyzed street segments.

5. Map(s) showing future traffic volumes with ambient growth without Project at the study intersections and street segments. This map should specify the future year used in the impact analysis and should be based on the expected date of project buildout. The future year identified in this step shall remain consistent for all other maps described below that illustrate future traffic projections.

6. Map(s) showing traffic generated by the related projects only. Use separate map for similar land uses (e.g. retail, office, residential, industrial/manufacturing) with similar trip distribution patterns (as they affect the study intersections and freeway locations).

7. Map(s) showing total future “cumulative base” traffic volumes without Project at the study intersections, freeway locations and street segments (add steps 5 and 6).

8. Map(s) showing Project trip distribution percentages (inbound and outbound) at the study intersections, freeway locations and project driveway(s). This map must be pre-approved by LADOT and included in the MOU.

9. Map(s) showing estimated Project-only traffic volumes at the study intersections, Project driveway(s), freeway locations and street segments.

10. Map(s) showing total existing traffic volumes with Project at the study intersections, project driveway(s), freeway locations and street segments (add steps 4 and 9).

11. Map(s) showing total future traffic volumes with Project at the study intersections, project driveway(s), freeway locations and street segments (add steps 7 and 9).

12. Map showing existing and projected transit lines.

ATTACHMENT G

Traffic Study Checklist

The following checklist highlights key requirements that are critical to LADOT's review of the traffic study in addition to the requirements listed in the Traffic Study Policies and Procedures. To avoid any delays in the review process, please provide the following:

- ❑ Hard copy and PDF electronic copy of the traffic study
- ❑ Legible site plan showing driveway locations, loading/unloading area, and any proposed highway dedication and widening
- ❑ Traffic study review fee
- ❑ Conceptual drawings of the proposed mitigation measures in hard copy and PDF electronic copy
- ❑ Traffic volumes counts in LADOT format
- ❑ City Planning Case Number (if applicable)
- ❑ Existing-use documentation (i.e., certificate of occupancy, lease agreements, utility bills, etc.)
- ❑ Traffic signal warrant sheets (if applicable)
- ❑ Traffic study shall be stamped by a Registered Traffic Engineer

LADOT Use Only

"Deemed Complete" by: _____ Date: _____

ATTACHMENT H

City Of Los Angeles
Department Of Transportation

MANUAL TRAFFIC COUNT SUMMARY

STREET:
North/South BROADWAY

East/West 75TH ST

Day: MONDAY Date: JULY 16, 2007 Weather: SUNNY

Hours: 7-10AM 2-5PM

School Day: YES District: CENTRAL I/S CODE 1451

	N/B	S/B	E/B	W/B
DUAL-WHEELED	101	139	3	6
BIKES	0	11	0	0
BUSES	0	98	0	0

	N/B	TIME	S/B	TIME	E/B	TIME	W/B	TIME
AM PK 15 MIN	329	7.15	168	7.45	5	8.00	28	7.15
PM PK 15 MIN	174	2.15	273	4.45	12	2.15	56	2.30
AM PK HOUR	1230	7.15	625	7.15	14	7.15	106	7.15
PM PK HOUR	609	2.00	1002	4.00	33	2.00	111	2.15

NORTHBOUND Approach

Hours	Lt	Th	Rt	Total
7-8	7	1056	94	1157
8-9	4	806	63	873
9-10	2	529	10	541
2-3	9	518	82	609
3-4	5	448	19	472
4-5	8	514	21	543
TOTAL	35	3871	289	4195

SOUTHBOUND Approach

Hours	Lt	Th	Rt	Total
7-8	47	550	11	608
8-9	32	459	5	496
9-10	10	374	4	388
2-3	33	679	12	724
3-4	30	816	16	862
4-5	20	973	9	1002
TOTAL	172	3851	57	4080

TOTAL	**XING S/L**		**XING N/L**	
N-S	Ped	Sch	Ped	Sch
1765	63	25	0	0
1369	30	8	2	0
929	4	0	1	0
1333	89	40	0	0
1334	12	4	4	0
1545	16	0	5	0
8275	214	77	12	0

EASTBOUND Approach

Hours	Lt	Th	Rt	Total
7-8	1	2	10	13
8-9	2	2	4	8
9-10	6	0	7	13
2-3	6	5	22	33
3-4	6	6	10	22
4-5	9	4	9	22
TOTAL	30	19	62	111

WESTBOUND Approach

Hours	Lt	Th	Rt	Total
7-8	43	4	54	101
8-9	32	2	34	68
9-10	18	1	19	38
2-3	42	5	60	107
3-4	34	2	27	63
4-5	32	5	27	64
TOTAL	201	19	221	441

TOTAL	**XING W/L**		**XING E/L**	
E-W	Ped	Sch	Ped	Sch
114	70	39	45	2
76	46	11	35	1
51	30	3	12	0
140	103	100	74	25
85	63	18	38	7
86	48	11	32	0
552	360	182	236	35

(Rev Oct 06)

ATTACHMENT I

PASS-BY TRIP RATES

PASS-BY TRIP DISCOUNT RATE	LAND USE CATEGORY
10%	Shopping Center 600,000 sf or more, Quality Restaurant, Specialty Retail, Furniture Store, Medical Office, Day Care, Theater/Cinema, Auto Sales/Repair
15%	Discount Club, Discount Store
20%	Shopping Center 300,000 to less than 600,000 sf, Bank/Savings & Loan, High Turnover Restaurant, Car Wash, Hardware/Lumber Store, Garden Center, Recreation/Health Club
30%	Shopping Center 100,000 to less than 300,000 sf, Auto Parts, Music/Video Store
40%	Shopping Center 50,000 to less than 100,000 sf, Supermarket, Drugstore, Bookstore
50%	Shopping Center less than 50,000 sf, Fast Food Restaurant, Gasoline/Service Station, Convenience Market, Flower/Bakery/Yogurt Shop, Dry Cleaner, Liquor Store

Note: These rates are derived from surveys published in the "Trip Generation Handbook: An ITE Recommended Practice," 2003.

ATTACHMENT J

Level of Service Worksheet
(Circular 212 Method)

I/S #:	North-South Street:	Glendale Boulevard			Year of Count:	2009		Ambient Growth (%):	0.75		Conducted by:	Chris			Date:	8/10/2011			
	East-West Street:	Temple Street			Projection Year:	2020		Peak Hour:	PM		Reviewed by:	Chris			Project:	TESTING ONLy			
No. of Phases				3			3			3			3				3		
Opposed Ø'ing: N/S-1, E/W-2 or Both-3?				0			0			0			0				0		
Right Turns: FREE-1, NRTOR-2 or OLA-3?		NB-- 0	SB--	0	NB-- 0	SB--	0	NB-- 0	SB--	0	NB-- 0	SB--	0	NB-- 0	SB--	0			
		EB-- 0	WB--	0	EB-- 0	WB--	0	EB-- 0	WB--	0	EB-- 0	WB--	0	EB-- 0	WB--	0			
ATSAC-1 or ATSAC+ATCS-2?				1			1			1			1				1		
Override Capacity				0			0			0			0				0		

MOVEMENT		EXISTING CONDITION			EXISTING PLUS PROJECT			FUTURE CONDITION W/O PROJECT				FUTURE CONDITION W/ PROJECT				FUTURE W/ PROJECT W/ MITIGATION			
		Volume	No. of Lanes	Lane Volume	Project Traffic	Total Volume	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume	Added Volume	Total Volume	No. of Lanes	Lane Volume
NORTHBOUND	Left	60	1	60	5	65	65	0	65	1	65	0	65	1	65	0	65	1	65
	Left-Through		0							0				0				0	
	Through	1642	1	831	141	1783	902	93	1876	1	949	15	1891	1	956	0	1891	1	956
	Through-Right		1							1				1				1	
	Right	19	0	19	2	21	21	0	21	0	21	0	21	0	21	0	21	0	21
	Left-Through-Right		0							0				0				0	
	Left-Right		0							0				0				0	
SOUTHBOUND	Left	83	1	83	7	90	90	76	166	1	166	0	166	1	166	0	166	1	166
	Left-Through		0							0				0				0	
	Through	716	1	462	61	777	501	155	932	1	579	0	932	1	579	0	932	1	579
	Through-Right		1							1				1				1	
	Right	207	0	207	18	225	225	0	225	0	225	0	225	0	225	0	225	0	225
	Left-Through-Right		0							0				0				0	
	Left-Right		0							0				0				0	
EASTBOUND	Left	29	1	29	2	31	31	0	31	1	31	0	31	1	31	0	31	1	31
	Left-Through		0							0				0				0	
	Through	565	1	401	48	613	435	107	720	1	507	0	720	1	507	0	720	2	360
	Through-Right		1							1				1				0	
	Right	237	0	237	20	257	257	37	294	0	294	0	294	0	294	0	294	1	262
	Left-Through-Right		0							0				0				0	
	Left-Right		0							0				0				0	
WESTBOUND	Left	317	1	317	27	344	344	0	344	1	344	0	344	1	344	0	344	1	344
	Left-Through		0							0				0				0	
	Through	665	1	371	57	722	403	186	908	1	496	0	908	1	496	0	908	1	496
	Through-Right		1							1				1				1	
	Right	77	0	77	7	84	84	0	84	0	84	0	84	0	84	0	84	0	84
	Left-Through-Right		0							0				0				0	
	Left-Right		0							0				0				0	
CRITICAL VOLUMES		North-South:		914	North-South:		992	North-South:		1115		North-South:		1122		North-South:		1122	
		East-West:		718	East-West:		779	East-West:		851		East-West:		851		East-West:		704	
		SUM:		1632	SUM:		1771	SUM:		1966		SUM:		1973		SUM:		1826	
VOLUME/CAPACITY (V/C) RATIO:				1.145			1.243			1.380				1.385				1.281	
V/C LESS ATSAC/ATCS ADJUSTMENT:				1.075			1.173			1.310				1.315				1.211	
LEVEL OF SERVICE (LOS):				F			F			F				F				F	

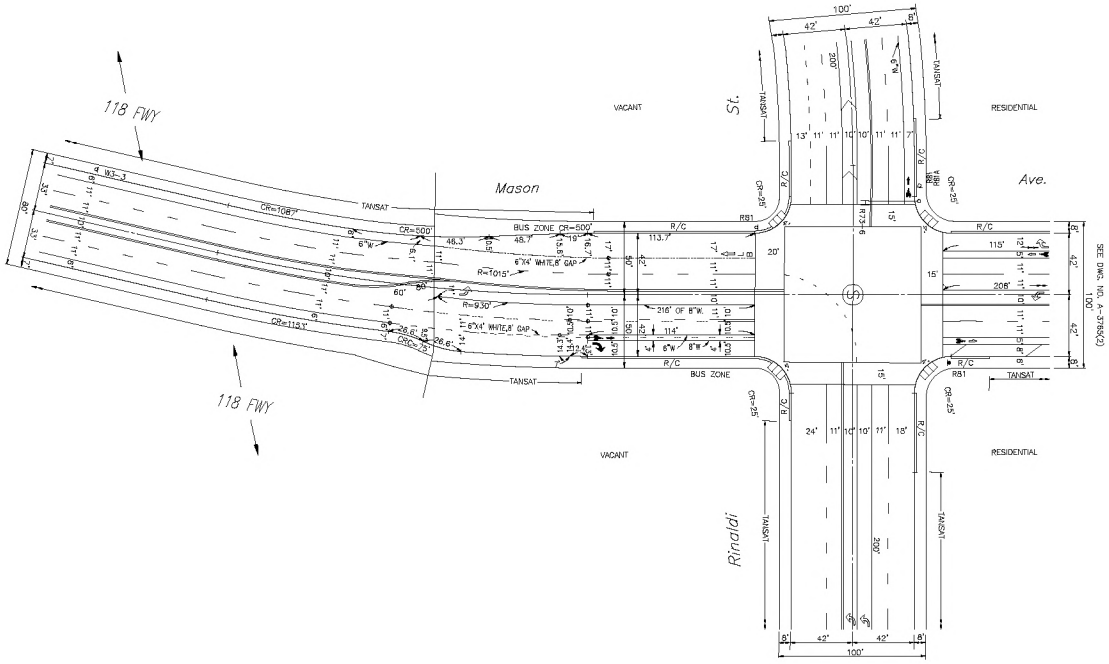
REMARKS:

Version: 1i Beta; 8/4/2011

PROJECT IMPACT

Change in *v/c* due to project:	0.005	Δ*v/c* after mitigation:	-0.099
Significant impacted?	NO	Fully mitigated?	N/A

Physical Improvements - Sample



LEGEND

1. EXISTING STRIPING & MARKINGS TO REMAIN
   EXISTING STRIPING & MARKINGS TO BE REMOVED
   PROPOSED STRIPING & MARKINGS
2. EXISTING SIGNS ▸ PROPOSED SIGNS
3. (S) SIGNALIZED INTERSECTION
4. R/C EXISTING RED CURB
   R/C PROPOSED RED CURB

NOTES

1. LENGTH OF DESIGN : 400' ±
2. PAINT REMOVAL REQUIRED.
3. TRAFFIC SIGNAL PLAN REQUIRED.

SCALE: 1"=40'

XXXX

SUBMITTED ____ 20__	RECOMMENDED ____ 20__	APPROVED ____ 20__
Transportation Engineer	Senior Transportation Engineer	Principal Transportation Engineer

REGISTERED PROFESSIONAL ENGINEER — JOHN E. FISHER — No. 25566 — Exp. 12-31-09 — CIVIL — STATE OF CALIFORNIA

INSTALLATION DATES
MARKOUT BEGAN:
MARKOUT COMPLETED:
STRIPING COMPLETED:
References:

Thomas Guide	District
500; C1	W.V.

CITY OF LOS ANGELES
DEPARTMENT OF TRANSPORTATION
RITA L. ROBINSON, GENERAL MANAGER

MASON AVENUE
AT RINALDI ST.

PROJECT NO. 90306 | DRAWING NO. A-5457 | 1/1

DATE	BY	REVISION DESCRIPTION
10-28-08	T.C.	T.E./SR. T.E.
10-22-09	K.T.	PRINCIPAL T.E.
10-28-08	S.S.	

NO.	DATE

BASE 90306 | CHECK | SUPERVISOR | DISTRICT STAFF

1"=20' ORIGINAL MAP SCALE 1"=40' — 20 10 0 20 40 60 80 100 FEET / 40 20 0 40 80 120 160 200 FEET

SCALES | HORZ. 1"= | VERT. 1"= | SHEET | INDEX NUMBER

ATTACHMENT L

TRANSPORTATION DEMAND MANAGEMENT AND TRIP REDUCTION MEASURES

(LAMC Section 12.26-J - amended by Ordinance 168,700)

1. DEFINITIONS

For the purpose of this section, certain words and terms are defined as follows:

Carpool. A vehicle carrying two to five persons to and from work on a regular schedule.
Development. The construction of new non-residential floor area.
Gross Floor Area. That area in square feet confined within the outside surface of the exterior walls of a building, as calculated by adding the total square footage of each of the floors in the building, except for that square footage devoted to vehicle parking and necessary interior driveways and ramps.
Preferential Parking. Parking spaces, designated or assigned through use of a sign or painted space markings for Carpools or Vanpools, that are provided in a location more convenient to the entrance for the place of employment than parking spaces provided for single-occupant vehicles.
Transportation Demand Management (TDM). The alteration of travel behavior through programs of incentives, services, and policies, including encouraging the use of alternatives to single-occupant vehicles such as public transit, cycling, walking, carpooling/vanpooling and changes in work schedule that move trips out of the peak period or eliminate them altogether (as in the case in telecommuting or compressed work weeks).
Trip Reduction. Reduction in the number of work-related trips made by single-occupant vehicles.
Vanpool. A vehicle carrying six or more persons to and from work on a regular schedule, and on a prepaid basis.
Vehicle. Any motorized form of transportation, including but not limited to automobiles, vans, buses and motorcycles.

2. APPLICABILITY

This subdivision applies only to the construction of new non-residential gross floor area. Prior to the issuance of a building permit, the owner/applicant shall agree, by way of a covenant that runs with the land, to provide and maintain in a state of good repair the following applicable transportation demand management and trip reduction measures.

3. REQUIREMENTS

(a) **Development in excess of 25,000 square feet of gross floor area**. The owner shall provide a bulletin board, display case, or kiosk (displaying transportation information) where the greatest number of employees are likely to see it. The transportation information displayed should include, but is not limited to, the following:

(1) Current routes and schedules for public transit serving the site;
(2) Telephone numbers for referrals on transportation information including numbers for the regional ridesharing agency and local transit operations;
(3) Ridesharing promotion material supplied by commuter-oriented organizations;
(4) Regional/local bicycle route and facility information;
(5) A listing of on-site services or facilities which are available for carpoolers, vanpoolers, bicyclists, and transit riders.

(b) **Development in excess of 50,000 square feet of gross floor area**. The owner shall comply with Paragraph (a) above and in addition shall provide:

(1) A designated parking area for employee carpools and vanpools as close as practical to the main pedestrian entrance(s) of the building(s). This area shall include at least ten percent of the parking spaces required for the site. The spaces shall be signed and striped sufficient to meet the employee demand for such spaces. The carpool/vanpool parking area shall be identified on the driveway and circulation plan upon application for a building permit;

(2) One permanent, clearly identified (signed and striped) carpool/vanpool parking space for the first 50,000 to 100,000 square feet of gross floor area and one additional permanent, clearly identified (signed and striped) carpool/vanpool parking space for any development over 100,000 square feet of gross floor area;

(3) Parking spaces clearly identified (signed and striped) shall be provided in the designated carpool/vanpool parking area at any time during the building's occupancy sufficient to meet employee demand for such spaces. Absent such demand, parking spaces within the designated carpool/vanpool parking area may be used by other vehicles;

(4) No signed and striped parking spaces for carpool/vanpool parking shall displace any handicapped parking;

(5) A statement that preferential carpool/vanpool spaces are available on-site and a description of the method for obtaining permission to use such spaces shall be included on the required transportation information board;

(6) A minimum vertical clearance of 7 feet 2 inches shall be provided for all parking spaces and access ways used by vanpool vehicles when located within a parking structure;

(7) Bicycle parking shall be provided in conformance with Section 12.21A16 of this Code.

c) **Development in excess of 100,000 square feet of gross floor area**. The owner shall comply with Paragraphs (a) and (b) above and shall provide:

(1) A safe and convenient area in which carpool/vanpool vehicles may load and unload passengers other than in their assigned parking area;

(2) Sidewalks or other designated pathways following direct and safe routes from the external pedestrian circulation system to each building in the development;

(3) If determined necessary by the City to mitigate the project impact, bus stop improvements shall be provided. The City will consult with the local bus service providers in determining appropriate improvements. When locating bus stops and/or planning building entrances, entrances shall be designed to provide safe and efficient access to nearby transit stations/stops;

(4) Safe and convenient access from the external circulation system to bicycle parking facilities on-site.

4. EXCEPTIONS

The provisions of this subsection shall not apply to developments for which an application has been deemed complete by the City pursuant to Government Code Section 65943, or for which a Notice of Preparation for a Draft Environmental Impact Report has been circulated or for which plans sufficient for a complete plan check were accepted by the Department of Building and Safety, on or before the effective date of this ordinance **(03/31/1993)**.

5. MONITORING

The Department of Transportation shall be responsible for monitoring the owner/applicant's continual implementation and maintenance of the project trip reduction features required by this ordinance.

6. ENFORCEMENT

Applicants shall execute and record a Covenant and Agreement that the trip reduction features required by this ordinance will be maintained, that required material specified in Subdivision 3 (a) (1)-(5) will be continually posted, and that additional carpool/vanpool spaces within the designated preferential area will be signed and striped for the use of ridesharing employees based on demand for such spaces. The Covenant and Agreement shall be acceptable to the Department of Transportation.

7. HARDSHIP EXEMPTION

In cases of extreme hardship, duly established to its satisfaction, the City Council, acting in its legislative capacity, and by resolution, may grant an exemption from any/or all the provisions of this ordinance. In granting such an exemption, the City Council shall make the following findings:

(a) Specific features of the development make it infeasible to satisfy all of the provisions of this subsection; and

(b) The applicant has committed to provide equivalent alternative measures to reduce vehicle trips.

ATTACHMENT M

ORDINANCE NO. 180542

An ordinance adding a new Section 19.15 to the Los Angeles Municipal Code relative to application fees to be paid to the Department of Transportation for the review and assessment of traffic study reports, condition clearance and permit issuance activities related to obtaining any environmental clearance for private development projects within the City of Los Angeles.

THE PEOPLE OF THE CITY OF LOS ANGELES DO ORDAIN AS FOLLOWS:

Section 1. Subdivision 6 of Subsection A of section 19.05 of the Los Angeles Municipal code is hereby repealed and Subdivisions 7, 8 and 9 thereof, are redesignated as Subdivisions 6, 7 and 8 respectively.

Sec. 2. A new Section 19.15 is added to the Los Angeles Municipal Code to read as follows:

Sec. 19.15. DEPARTMENT OF TRANSPORTATION TRAFFIC STUDY REVIEW, CONDITION CLEARANCE AND PERMIT ISSUANCE FEES

(a) The following specific fees shall be paid to the Department of Transportation for the preparation and processing of traffic reports, clearance of conditions and permit sign offs in connection with obtaining any environmental clearance and/or permit issuance related tasks.

(1)	Initial Site Assessment Form (ISAF) Issuance	$ 434
(2)	Traffic Study MOU	$1,143
(3)	Traffic Study Reviews (note 1)	$7,396
(4)	Site plan Reviews	$1,789
(5)	Project Condition Clearance (note 2)	$ 256
(6)	Driveway Permit Sign-Offs	$ 508
(7)	Building Permit Sign-Offs	$ 354
(8)	Subdivision Reports	$ 197
(9)	Dedication & Widening Waivers	$ 764
(10)	Street Vacation Requests	$1,910

Note 1: $7,396 for the first 10 study intersections plus $400 per each additional study intersection, not to exceed a total of $25,000.
Note 2: $256 for the first 3 condition clearances plus $200 for each additional condition clearance.

(b) TRANSPORTATION REVIEW FEE FUND

A Transportation Review Fee Fund is hereby established into which two percent (2%) of the fees collected pursuant to this Section shall be

deposited. This fund shall be used exclusively by the Department of Transportation to provide funding for the continual enhancement of development review-related information technology systems, including procurement costs associated with equipment, materials and consulting services. Except as provided herein, all fees collected pursuant to this Section shall be credited to the General Fund.

(c) METHODS OF ADJUSTMENT OF FEES

The Department of Transportation shall provide an annual review of the fees established pursuant to this Section, and shall submit recommendations for changes in these fees for special services to the Council, as follows:

(1) By May 1st of each odd numbered year, the Department shall provide a comprehensive study of fees for services, and shall provide a report and proposed draft ordinance to the Mayor and the City Council detailing any requested changes in the fees for any special services enumerated in this Section. The comprehensive study shall include: 1) measurement of the average salary increase in effect for all Transportation Planning (TP) staff members from the previous calendar year; 2) measurement of changes in material, equipment and contract costs related to any and all fee-for-service items; 3) adjustment of any changes required in the amount of personnel time necessary to complete any service tasks; and 4) current indirect costs for labor provided by the City's Cost Allocation Plan. Cost figures shall be compared to the current baseline established for each fee. Recommended fee changes shall be rounded to the nearest whole dollar. The recommended fee changes shall be requested to take effect beginning July 1st of the reporting year.

(2) By May 1st of each even numbered year, the Department shall provide a proposal for the adjustment of fees for services, and shall provide a report and proposed draft ordinance to the Mayor and the City Council detailing any requested changes in the fees for any service enumerated in this Section. The adjustment shall include a measurement of the average salary increase in effect for all TP staff members from the previous calendar year. Current indirect costs for labor from the City's Cost Allocation Plan shall also be included as part of the adjustment and assessment report. Cost figures shall be compared to the current baseline established for each fee. Recommended fee changes shall be rounded to the nearest whole dollar. The recommended fee changes shall be requested to take effect beginning July 1st of the reporting year.

Sec. 3. The City Clerk shall certify to the passage of this ordinance and have it published in accordance with Council policy, either in a daily newspaper circulated in the City of Los Angeles or by posting for ten days in three public places in the City of Los Angeles: one copy on the bulletin board located at the Main Street entrance to the Los Angeles City Hall; one copy on the bulletin board located at the Main Street entrance to the Los Angeles City Hall East; and one copy on the bulletin board located at the Temple Street entrance to the Los Angeles County Hall of Records.

I hereby certify that this ordinance was passed by the Council of the City of Los Angeles, at its meeting of FEB 10 2009.

KAREN E. KALFAYAN, City Clerk

By _____
Deputy

Approved FEB 18 2009

_____
Mayor

Approved as to Form and Legality

ROCKARD J. DELGADILLO, City Attorney

By _____
SHELLEY I. SMITH
Assistant City Attorney

Date 10/21/08

File No. CF 08-2268

M:\General Counsel (GC)\SHELLEY SMITH\ORDINANCES\LAMC 19.15 Ord.doc

APPENDIX C

CALTRANS GUIDE FOR THE PREPARATION OF TRAFFIC IMPACT STUDIES



GUIDE FOR THE PREPARATION

OF

TRAFFIC IMPACT STUDIES

STATE OF CALIFORNIA
DEPARTMENT OF TRANSPORTATION

December 2002

PREFACE

The California Department of Transportation (Caltrans) has developed this "Guide for the Preparation of Traffic Impact Studies" in response to a survey of cities and counties in California. The purpose of that survey was to improve the Caltrans local development review process (also known as the Intergovernmental Review/California Environmental Quality Act or IGR/CEQA process). The survey indicated that approximately 30 percent of the respondents were not aware of what Caltrans required in a traffic impact study (TIS).

In the early 1990s, the Caltrans District 6 office located in Fresno identified a need to provide better quality and consistency in the analysis of traffic impacts generated by local development and land use change proposals that effect State highway facilities. At that time, District 6 brought together both public and private sector expertise to develop a traffic impact study guide. The District 6 guide has proven to be successful at promoting consistency and uniformity in the identification and analysis of traffic impacts generated by local development and land use changes.

The guide developed in Fresno was adapted for statewide use by a team of Headquarters and district staff. The guide will provide consistent guidance for Caltrans staff who review local development and land use change proposals as well as inform local agencies of the information needed for Caltrans to analyze the traffic impacts to State highway facilities. The guide will also benefit local agencies and the development community by providing more expeditious review of local development proposals.

Even though sound planning and engineering practices were used to adapt the Fresno TIS guide, it is anticipated that changes will occur over time as new technologies and more efficient practices become available. To facilitate these changes, Caltrans encourages all those who use this guide to contact their nearest district office (i.e., IGR/CEQA Coordinator) to coordinate any changes with the development team.

ACKNOWLEDGEMENTS

The District 6 traffic impact study guide provided the impetus and a starting point for developing the statewide guide. Special thanks is given to Marc Birnbaum for recognizing the need for a TIS guide and for his valued experience and vast knowledge of land use planning to significantly enhance the effort to adapt the District 6 guide for statewide use. Randy Treece from District 6 provided many hours of coordination, research and development of the original guide and should be commended for his diligent efforts. Sharri Bender Ehlert of District 6 provided much of the technical expertise in the adaptation of the District 6 guide and her efforts are greatly appreciated.

A special thanks is also given to all those Cities, Counties, Regional Agencies, Congestion Management Agencies, Consultants, and Caltrans Employees who reviewed the guide and provided input during the development of this Guide for the Preparation of Traffic Impact Studies.

TABLE OF CONTENTS

Contents		Page Number
PREFACE and ACKNOWLEDGEMENTS		ii
I.	INTRODUCTION	1
II.	WHEN A TRAFFIC IMPACT STUDY IS NEEDED	1
A.	Trip Generation Thresholds	2
B.	Exceptions	
C.	Updating An Existing Traffic Impact Study	2
III.	SCOPE OF TRAFFIC IMPACT STUDY	2
A.	Boundaries of the Traffic Impact Study	2
B.	Traffic Analysis Scenarios	2
IV.	TRAFFIC DATA	4
A.	Trip Generation	4
B.	Traffic Counts	4
C.	Peak Hours	4
D.	Travel Forecasting (Transportation Modeling)	5
V.	TRAFFIC IMPACT ANALYSIS METHODOLOGIES	5
A.	Freeway Sections	5
B.	Weaving Areas	5
C.	Ramps and Ramp Junctions	5
D.	Multi-lane Rural and Urban Highways	5
E.	Two-lane Highways	5
F.	Signalized Intersections	5
G.	Unsignalized Intersections	5
H.	Transit Capacity	5
I.	Pedestrians	5
J.	Bicycles	5
K.	Caltrans Criteria/Warrants	5
L.	Channelization	5
VI.	MITIGATION MEASURES	6

Appendix "A" Minimum Contents of Traffic Impact Study
Appendix "B" Methodology for Calculating Equitable Mitigation Measures
Appendix "C" Measures of Effectiveness by Facility Type

I. INTRODUCTION

Caltrans desires to provide a safe and efficient State transportation system for the citizens of California pursuant to various Sections of the California Streets and Highway Code. This is done in partnership with local and regional agencies through procedures established by the California Environmental Quality Act (CEQA) and other land use planning processes. The intent of this guide is to provide a starting point and a consistent basis in which Caltrans evaluates traffic impacts to State highway facilities. The applicability of this guide for local streets and roads (non-State highways) is at the discretion of the effected jurisdiction.

Caltrans reviews federal, State, and local agency development projects[1], and land use change proposals for their potential impact to State highway facilities. The primary objectives of this guide is to provide:

- guidance in determining if and when a traffic impact study (TIS) is needed,
- consistency and uniformity in the identification of traffic impacts generated by local land use proposals,
- consistency and equity in the identification of measures to mitigate the traffic impacts generated by land use proposals,
- lead agency[2] officials with the information necessary to make informed decisions regarding the existing and proposed transportation infrastructure (see Appendix A, Minimum Contents of a TIS)
- TIS requirements early in the planning phase of a project (i.e., initial study, notice of preparation, or earlier) to eliminate potential delays later,
- a quality TIS by agreeing to the assumptions, data requirements, study scenarios, and analysis methodologies prior to beginning the TIS, and
- early coordination during the planning phases of a project to reduce the time and cost of preparing a TIS.

II. WHEN A TRAFFIC IMPACT STUDY IS NEEDED

The level of service[3] (LOS) for operating State highway facilities is based upon measures of effectiveness (MOEs). These MOEs (see Appendix "C-2") describe the measures best suited for analyzing State highway facilities (i.e., freeway segments, signalized intersections, on- or off-ramps, etc.). Caltrans endeavors to maintain a target LOS at the transition between LOS "C" and LOS "D" (see Appendix "C-3") on State highway facilities, however, Caltrans acknowledges that this may not always be feasible and recommends that the lead agency consult with Caltrans to determine the appropriate target LOS. If an existing State highway facility is operating at less than the appropriate target LOS, the existing MOE should be maintained.

---

[1] "Project" refers to activities directly undertaken by government, financed by government, or requiring a permit or other approval from government as defined in Section 21065 of the Public Resources Code and Section 15378 of the California Code of Regulations.

[2] "Lead Agency" refers to the public agency that has the principal responsibility for carrying out or approving a project. Defined in Section 21165 of the Public Resources Code, the "California Environmental Quality Act, and Section 15367 of the California Code of Regulations.

[3] "Level of service" as defined in the latest edition of the Highway Capacity Manual, Transportation Research Board, National Research Council.

A. Trip Generation Thresholds

The following criterion is a starting point in determining when a TIS is needed. When a project:

1. Generates over 100 peak hour trips assigned to a State highway facility
2. Generates 50 to 100 peak hour trips assigned to a State highway facility – and, affected State highway facilities are experiencing noticeable delay; approaching unstable traffic flow conditions (LOS "C" or "D").
3. Generates 1 to 49 peak hour trips assigned to a State highway facility – the following are examples that may require a full TIS or some lesser analysis[4]:
    a. Affected State highway facilities experiencing significant delay; unstable or forced traffic flow conditions (LOS "E" or "F").
    b. The potential risk for a traffic incident is significantly increased (i.e., congestion related collisions, non-standard sight distance considerations, increase in traffic conflict points, etc.).
    c. Change in local circulation networks that impact a State highway facility (i.e., direct access to State highway facility, a non-standard highway geometric design, etc.).

Note: A traffic study may be as simple as providing a traffic count to as complex as a microscopic simulation. The appropriate level of study is determined by the particulars of a project, the prevailing highway conditions, and the forecasted traffic.

B. Exceptions

Exceptions require consultation between the lead agency, Caltrans, and those preparing the TIS. When a project's traffic impact to a State highway facility can clearly be anticipated without a study and all the parties involved (lead agency, developer, and the Caltrans district office) are able to negotiate appropriate mitigation, a TIS may not be necessary.

C. Updating An Existing Traffic Impact Study

A TIS requires updating when the amount or character of traffic is significantly different from an earlier study. Generally a TIS requires updating every two years. A TIS may require updating sooner in rapidly developing areas and not as often in slower developing areas. In these cases, consultation with Caltrans is strongly recommended.

III. SCOPE OF TRAFFIC IMPACT STUDY

Consultation between the lead agency, Caltrans, and those preparing the TIS is recommended before commencing work on the study to establish the appropriate scope. At a minimum, the TIS should include the following:

A. Boundaries of the Traffic Impact Study

All State highway facilities impacted in accordance with the criteria in Section II should be studied. Traffic impacts to local streets and roads can impact intersections with State highway facilities. In these cases, the TIS should include an analysis of adjacent local facilities, upstream and downstream, of the intersection (i.e., driveways, intersections, and interchanges) with the State highway.

[4] A "lesser analysis" may include obtaining traffic counts, preparing signal warrants, or a focused TIS, etc.

B. Traffic Analysis Scenarios

Caltrans is interested in the effects of general plan updates and amendments as well as the effects of specific project entitlements (i.e., site plans, conditional use permits, sub-divisions, rezoning, etc.) that have the potential to impact a State highway facility. The complexity or magnitude of the impacts of a project will normally dictate the scenarios necessary to analyze the project. Consultation between the lead agency, Caltrans, and those preparing the TIS is recommended to determine the appropriate scenarios for the analysis. The following scenarios should be addressed in the TIS when appropriate:

1. When only a general plan amendment or update is being sought, the following scenarios are required:
   a) Existing Conditions - Current year traffic volumes and peak hour LOS analysis of effected State highway facilities.
   b) Proposed Project Only with Select Zone[5] Analysis - Trip generation and assignment for build-out of general plan.
   c) General Plan Build-out Only - Trip assignment and peak hour LOS analysis. Include current land uses and other pending general plan amendments.
   d) General Plan Build-out Plus Proposed Project - Trip assignment and peak hour LOS analysis. Include proposed project and other pending general plan amendments.

2. When a general plan amendment is not proposed and a proposed project is seeking specific entitlements (i.e., site plans, conditional use permits, sub-division, rezoning, etc.), the following scenarios must be analyzed in the TIS:
   a) Existing Conditions - Current year traffic volumes and peak hour LOS analysis of effected State highway facilities.
   b) Proposed Project Only - Trip generation, distribution, and assignment in the year the project is anticipated to complete construction.
   c) Cumulative Conditions (Existing Conditions Plus Other Approved and Pending Projects Without Proposed Project) - Trip assignment and peak hour LOS analysis in the year the project is anticipated to complete construction.
   d) Cumulative Conditions Plus Proposed Project (Existing Conditions Plus Other Approved and Pending Projects Plus Proposed Project) - Trip assignment and peak hour LOS analysis in the year the project is anticipated to complete construction.
   e) Cumulative Conditions Plus Proposed Phases (Interim Years) - Trip assignment and peak hour LOS analysis in the years the project phases are anticipated to complete construction.
3. In cases where the circulation element of the general plan is not consistent with the land use element or the general plan is outdated and not representative of current or future forecasted conditions, all scenarios from Sections III. B. 1. and 2. should be utilized with the exception of duplicating of item 2.a.

[5] "Select zone" analysis represents a project only traffic model run, where the project's trips are distributed and assigned along a loaded highway network. This procedure isolates the specific impact on the State highway network.

IV. TRAFFIC DATA

Prior to any fieldwork, consultation between the lead agency, Caltrans, and those preparing the TIS is recommended to reach consensus on the data and assumptions necessary for the study. The following elements are a starting point in that consideration.

A. Trip Generation

The latest edition of the Institute of Transportation Engineers' (ITE) TRIP GENERATION report should be used for trip generation forecasts. Local trip generation rates are also acceptable if appropriate validation is provided to support them.

1. Trip Generation Rates – When the land use has a limited number of studies to support the trip generation rates or when the Coefficient of Determination (R^2) is below 0.75, consultation between the lead agency, Caltrans and those preparing the TIS is recommended.
2. Pass-by Trips[6] – Pass-by trips are only considered for retail oriented development. Reductions greater than 15% requires consultation and acceptance by Caltrans. The justification for exceeding a 15% reduction should be discussed in the TIS.
3. Captured Trips[7] – Captured trip reductions greater than 5% requires consultation and acceptance by Caltrans. The justification for exceeding a 5% reduction should be discussed in the TIS.
4. Transportation Demand Management (TDM) – Consultation between the lead agency and Caltrans is essential before applying trip reduction for TDM strategies.

NOTE: Reasonable reductions to trip generation rates are considered when adjacent State highway volumes are sufficient (at least 5000 ADT) to support reductions for the land use.

B. Traffic Counts

Prior to field traffic counts, consultation between the lead agency, Caltrans and those preparing the TIS is recommended to determine the level of detail (e.g., location, signal timing, travel speeds, turning movements, etc.) required at each traffic count site. All State highway facilities within the boundaries of the TIS should be considered. Common rules for counting vehicular traffic include but are not limited to:

1. Vehicle counts should be conducted on Tuesdays, Wednesdays, or Thursdays during weeks not containing a holiday and conducted in favorable weather conditions.
2. Vehicle counts should be conducted during the appropriate peak hours (see peak hour discussion below).
3. Seasonal and weekend variations in traffic should also be considered where appropriate (i.e., recreational routes, tourist attractions, harvest season, etc.).

C. Peak Hours

To eliminate unnecessary analysis, consultation between the lead agency, Caltrans and those preparing the TIS is recommended during the early planning stages of a project. In general, the TIS should include a morning (a.m.) and an evening (p.m.) peak hour analyses. Other peak hours (e.g., 11:30 a.m. to 1:30 p.m., weekend, holidays, etc.) may also be required to determine the significance of the traffic impacts generated by a project.

---

[6] "Pass-by" trips are made as intermediate stops between an origin and a primary trip destination (i.e., home to work, home to shopping, etc.).

[7] "Captured Trips" are trips that do not enter or leave the driveways of a project's boundary within a mixed-use development.

D. Travel Forecasting (Transportation Modeling)

The local or regional traffic model should reflect the most current land use and planned improvements (i.e., where programming or funding is secured). When a general plan build-out model is not available, the closest forecast model year to build-out should be used. If a traffic model is not available, historical growth rates and current trends can be used to project future traffic volumes. The TIS should clearly describe any changes made in the model to accommodate the analysis of a proposed project.

V. TRAFFIC IMPACT ANALYSIS METHODOLOGIES

Typically, the traffic analysis methodologies for the facility types indicated below are used by Caltrans and will be accepted without prior consultation. When a State highway has saturated flows, the use of a micro-simulation model is encouraged for the analysis (please note however, the micro-simulation model must be calibrated and validated for reliable results). Other analysis methods may be accepted, however, consultation between the lead agency, Caltrans and those preparing the TIS is recommended to agree on the data necessary for the analysis.

A. Freeway Segments – Highway Capacity Manual (HCM)*, operational analysis
B. Weaving Areas – Caltrans Highway Design Manual (HDM)
C. Ramps and Ramp Junctions – HCM*, operational analysis or Caltrans HDM, Caltrans Ramp Metering Guidelines (most recent edition)
D. Multi-Lane Highways – HCM*, operational analysis
E. Two-lane Highways – HCM*, operational analysis
F. Signalized Intersections[8] – HCM*, Highway Capacity Software**, operational analysis, TRAFFIX™**, Synchro**, see footnote 8
G. Unsignalized Intersections – HCM*, operational analysis, Caltrans Traffic Manual for signal warrants if a signal is being considered
H. Transit – HCM*, operational analysis
I. Pedestrians – HCM*
J. Bicycles – HCM*
K. Caltrans Criteria/Warrants – Caltrans Traffic Manual (stop signs, traffic signals, freeway lighting, conventional highway lighting, school crossings)
L. Channelization – Caltrans guidelines for Reconstruction of Intersections, August 1985, Ichiro Fukutome

*The most current edition of the Highway Capacity Manual, Transportation Research Board, National Research Council, should be used.

****NOTE**: Caltrans does not officially advocate the use of any special software. However, consistency with the HCM is advocated in most but not all cases. The Caltrans local development review units utilize the software mentioned above. If different software or analytical techniques are used for the TIS then consultation between the lead agency, Caltrans and those preparing the TIS is recommended. Results that are significantly different than those produced with the analytical techniques above should be challenged.

[8] The procedures in the Highway Capacity Manual "do not explicitly address operations of closely spaced signalized intersections. Under such conditions, several unique characteristics must be considered, including spill-back potential from the downstream intersection to the upstream intersection, effects of downstream queues on upstream saturation flow rate, and unusual platoon dispersion or compression between intersections. An example of such closely spaced operations is signalized ramp terminals at urban interchanges. Queue interactions between closely spaced intersections may seriously distort the procedures in" the HCM.

VI. MITIGATION MEASURES

The TIS should provide the nexus [Nollan v. California Coastal Commission, 1987, 483 U.S. 825 (108 S.Ct. 314)] between a project and the traffic impacts to State highway facilities. The TIS should also establish the rough proportionality [Dolan v. City of Tigard, 1994, 512 U.S. 374 (114 S. Ct. 2309)] between the mitigation measures and the traffic impacts. One method for establishing the rough proportionality or a project proponent's equitable responsibility for a project's impacts is provided in Appendix "B." Consultation between the lead agency, Caltrans and those preparing the TIS is recommended to reach consensus on the mitigation measures and who will be responsible.

Mitigation measures must be included in the traffic impact analysis. This determines if a project's impacts can be eliminated or reduced to a level of insignificance. Eliminating or reducing impacts to a level of insignificance is the standard pursuant to CEQA and the National Environmental Policy Act (NEPA). The lead agency is responsible for administering the CEQA review process and has the principal authority for approving a local development proposal or land use change. Caltrans, as a responsible agency, is responsible for reviewing the TIS for errors and omissions that pertain to State highway facilities. However, the authority vested in the lead agency under CEQA does not take precedence over other authorities in law.

If the mitigation measures require work in the State highway right-of-way an encroachment permit from Caltrans will be required. This work will also be subject to Caltrans standards and specifications. Consultation between the lead agency, Caltrans and those preparing the TIS early in the planning process is strongly recommended to expedite the review of local development proposals and to reduce conflicts and misunderstandings in both the local agency CEQA review process as well as the Caltrans encroachment permit process.

APPENDIX "A"

MINIMUM CONTENTS

OF A

TRAFFIC IMPACT STUDY

MINIMUM CONTENTS OF TRAFFIC IMPACT STUDY REPORT

I. EXECUTIVE SUMMARY

II. TABLE OF CONTENTS

A. List of Figures (Maps)
B. List of Tables

III. INTRODUCTION

A. Description of the proposed project
B. Location of project
C. Site plan including all access to State highways (site plan, map)
D. Circulation network including all access to State highways (vicinity map)
E. Land use and zoning
F. Phasing plan including proposed dates of project (phase) completion
G. Project sponsor and contact person(s)
H. References to other traffic impact studies

IV. TRAFFIC ANALYSIS

A. Clearly stated assumptions
B. Existing and projected traffic volumes (including turning movements), facility geometry (including storage lengths), and traffic controls (including signal phasing and multi-signal progression where appropriate) (figure)
C. Project trip generation including references (table)
D. Project generated trip distribution and assignment (figure)
E. LOS and warrant analyses - existing conditions, cumulative conditions, and full build of general plan conditions with and without project

V. CONCLUSIONS AND RECOMMENDATIONS

A. LOS and appropriate MOE quantities of impacted facilities with and without mitigation measures
B. Mitigation phasing plan including dates of proposed mitigation measures
C. Define responsibilities for implementing mitigation measures
D. Cost estimates for mitigation measures and financing plan

VI. APPENDICES

A. Description of traffic data and how data was collected
B. Description of methodologies and assumptions used in analyses
C. Worksheets used in analyses (i.e., signal warrant, LOS, traffic count information, etc.)

APPENDIX "B"

METHODOLOGY FOR

CALCULATING EQUITABLE

MITIGATION MEASURES

METHOD FOR CALCULATING EQUITABLE MITIGATION MEASURES

The methodology below is neither intended as, nor does it establish, a legal standard for determining equitable responsibility and cost of a project's traffic impact, the intent is to provide:

1. A starting point for early discussions to address traffic mitigation equitably.
2. A means for calculating the equitable share for mitigating traffic impacts.
3. A means for establishing rough proportionality [Dolan v. City of Tigard, 1994, 512 U.S. 374 (114 S. Ct. 2309)].

The formulas should be used when:

- A project has impacts that do not immediately warrant mitigation, but their cumulative effects are significant and will require mitigating in the future.
- A project has an immediate impact and the lead agency has assumed responsibility for addressing operational improvements

NOTE: This formula is not intended for circumstances where a project proponent will be receiving a substantial benefit from the identified mitigation measures. In these cases, (e.g., mid-block access and signalization to a shopping center) the project should take full responsibility to toward providing the necessary infrastructure.

EQUITABLE SHARE RESPONSIBILITY: **Equation C-1**

NOTE: $T_E < T_B$, see explanation for T_B below.

$$P = \frac{T}{T_B - T_E}$$

Where:

P = The equitable share for the proposed project's traffic impact.

T = The vehicle trips generated by the project during the peak hour of adjacent State highway facility in vehicles per hour, vph.

T_B = The forecasted traffic volume on an impacted State highway facility at the time of general plan build-out (e.g., 20 year model or the furthest future model date feasible), vph.

T_E = The traffic volume existing on the impacted State highway facility plus other approved projects that will generate traffic that has yet to be constructed/opened, vph.

EQUITABLE COST: **Equation C-2**

$$C = P\ (C_T)$$

Where:

C = The equitable cost of traffic mitigation for the proposed project, ($). (Rounded to nearest one thousand dollars)

P = The equitable share for the project being considered.

C_T = The total cost estimate for improvements necessary to mitigate the forecasted traffic demand on the impacted State highway facility in question at general plan build-out, ($).

NOTES

1. Once the equitable share responsibility and equitable cost has been established on a per trip basis, these values can be utilized for all projects on that State highway facility until the forecasted general plan build-out model is revised.
2. Truck traffic should be converted to passenger car equivalents before utilizing these equations (see the Highway Capacity Manual for converting to passenger car equivalents).

3. If the per trip cost is not used for all subsequent projects, then the equation below will be necessary to determine the costs for individual project impact and will require some additional accounting.

Equation C-2.A

$$C = P\,(C_T - C_C)$$

Where:

C = Same as equation C-2.

P = Same as equation C-2.

C_T = Same as equation C-2.

C_C = The combined dollar contributions paid and committed prior to current project's contribution. This is necessary to provide the appropriate cost proportionality. Example: For the first project to impact the State highway facility in question since the total cost (C_T) estimate for improvements necessary to mitigate the forecasted traffic demand, C_C would be equal to zero. For the second project however, C would equal $P_2(C_T - C_1)$ and for the third project to come along C would equal $P_3[C_T - (C_1 + C_2)]$ and so on until build-out or the general plan build-out was recalculated.

APPENDIX "C"

MEASURES OF EFFECTIVENESS

BY

FACILITY TYPE

MEASURES OF EFFECTIVENESS BY FACILITY TYPE

TYPE OF FACILITY	MEASURE OF EFFECTIVENESS (MOE)
Basic Freeway Segments	Density (pc/mi/ln)
Ramps	Density (pc/mi/ln)
Ramp Terminals	Delay (sec/veh)
Multi-Lane Highways	Density (pc/mi/ln)
Two-Lane Highways	Percent-Time-Following Average Travel Speed (mi/hr)
Signalized Intersections	Control Delay per Vehicle (sec/veh)
Unsignalized Intersections	Average Control Delay per Vehicle (sec/veh)
Urban Streets	Average Travel Speed (mi/hr)

Measures of effectiveness for level of service definitions located in the most recent version of the Highway Capacity Manual, Transportation Research Board, National Research Council.

Transition between LOS "C" and LOS "D" Criteria

(Reference Highway Capacity Manual)

BASIC FREEWAY SEGMENTS @ 65 mi/hr

LOS	Maximum Density (pc/mi/ln)	Minimum Speed (mph)	Maximum v/c	Maximum Service Flow Rate (pc/hr/ln)
A	11	65.0	0.30	710
B	18	65.0	0.50	1170
C	26	64.6	0.71	1680
D	35	59.7	0.89	2090
E	45	52.2	1.00	2350

SIGNALIZED INTERSECTIONS and RAMP TERMINALS

LOS	Control Delay per Vehicle (sec/veh)
A	**≤ 10**
B	**> 10 - 20**
C	**> 20 - 35**
D	**> 35 - 55**
E	**> 55 - 80**
F	**> 80**

MULTI-LANE HIGHWAYS @ 55 mi/hr

LOS	Maximum Density (pc/mi/ln)	Minimum Speed (mph)	Maximum v/c	Maximum Service Flow Rate (pc/hr/ln)
A	11	55.0	0.29	600
B	18	55.0	0.47	990
C	26	54.9	0.68	1430
D	35	52.9	0.88	1850
E	41	51.2	1.00	2100

Dotted line represents the transition between LOS "C" and LOS "D"

TWO-LANE HIGHWAYS

LOS	Percent Time-Spent-Following	Average Travel Speed (mi/hr)
A	35	> 55
B	> 35 - 50	> 50 - 55
C	> 50 - 65	> 45 - 50
D	> 65 - 80	> 40 - 45
E	> 80	40

URBAN STREETS

Urban Street Class	I	II	III	IV
Range of FFS	55 to 45 mi/hr	45 to 35 mi/hr	35 to 30 mi/hr	35 to 25 mi/hr
Typical FFS	50 mi/hr	40 mi/hr	35 mi/hr	30 mi/hr
LOS	Average Travel Speed (mi/hr)			
A	> 42	> 35	> 30	> 25
B	> 34 - 42	> 28 - 35	> 24 - 30	> 19 - 25
C	> 27 - 34	> 22 - 28	> 18 - 24	> 13 - 19
D	> 21 - 27	> 17 - 22	> 14 - 18	> 9 - 13
E	> 16 - 21	> 13 - 17	> 10 - 14	> 7 - 9
F	16	13	10	7

Dotted line represents the transition between LOS "C" and LOS "D"

GRAY DAVIS
Governor

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Additional copies of these guidelines can be copied from the internet at,
http://www.dot.ca.gov/hq/traffops/developserv/operationalsystems/

APPENDIX D

PRELIMINARY HEALTH RISK EVALUATION – LANCER SITE, JANUARY 18, 1995

PRELIMINARY HEALTH RISK EVALUATION
LANCER SITE
Los Angeles, California



Prepared for:

Port of Los Angeles
Environmental Management Division
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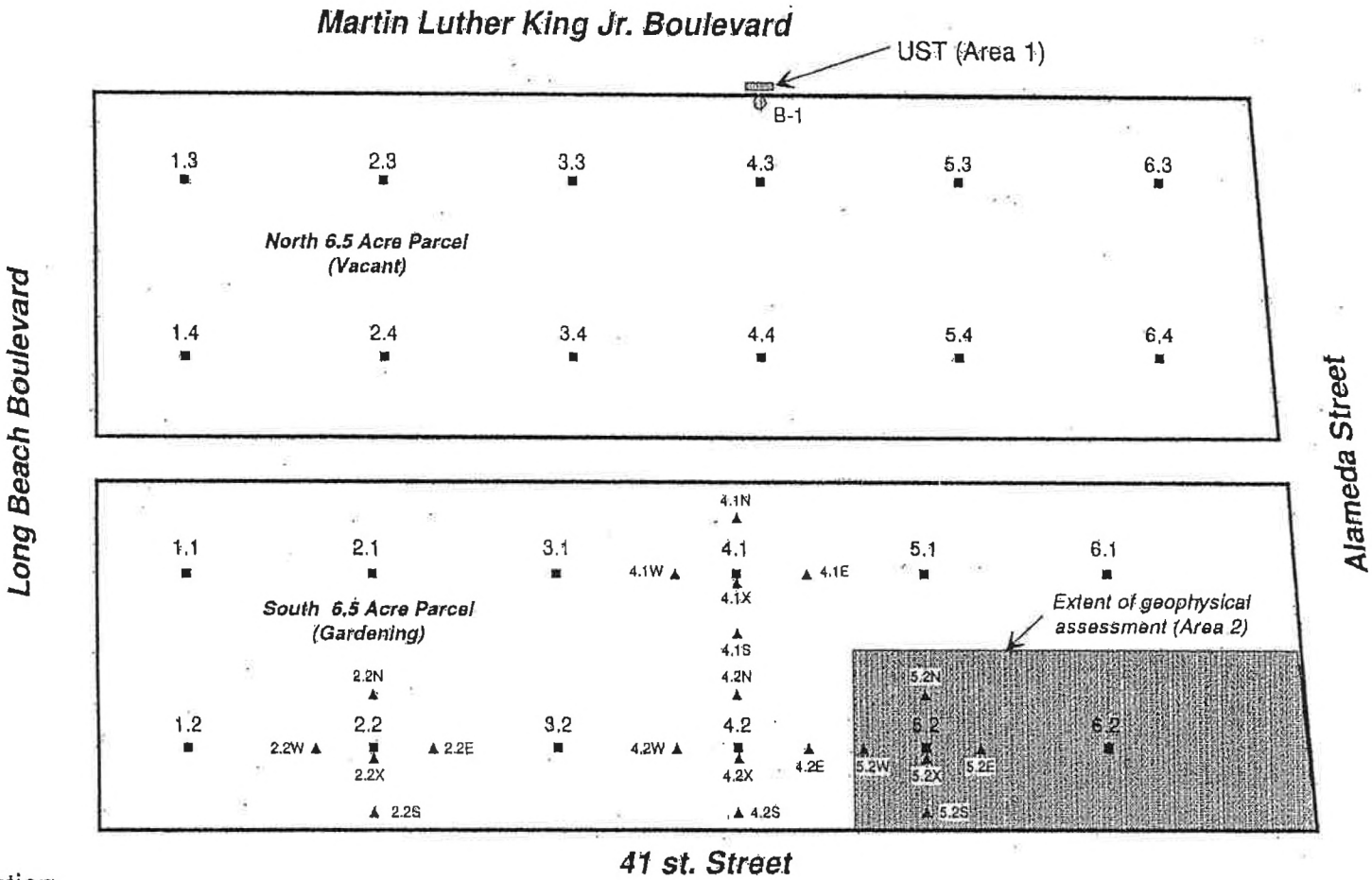
Richard R. Coles, R.E.A.
Vice President

Naomi L. Goodman, MSPH
Associate Environmental Scientist

January 18, 1995
Project No. 6668.02

HARTCROWSER

HARTCROWSER
Earth and Environmental Technologies



Explaination

- ■ 5-Foot Boring
- ▲ Surface Confirmation Sample
- ⊕ 15-Foot soil Boring

0 150 300

Approximate Scale In Feet

N

HARTCROWSER

PROJECT NAME: POLA LANCER

SITE PLAN
6.5 ACRE PARCELS - LANCER

PROJECT NO.: 6668-02 | DATE: JANAURY 1995

FIGURE 2

TABLE 1
Summary of Laboratory Results
South 6.5-Acre Site
Organics

All concentrations in milligrams per kilogram (mg/kg)

Boring	Depth (Feet)	SVOCs (8270)							VOCs (8240)		TRPH (418.1)	TVH (8015M)
		Benzo(b) fluoranthene	Benzo(a) pyrene	Chrysene	Fluoranthene	Phenanthrene	Pyrene	bis(2-ethylhexyl) phthalate	Methylene Chloride	Tetrachloro-ethene		
1.1	0.5	ND	ND	ND	ND	ND	ND	ND	--	--	--	--
1.1	5	--	--	--	--	--	--	--	ND	0.005	ND	ND
2.1	0.5	ND	ND	ND	ND	ND	ND	ND	--	--	--	--
2.1	3	ND	ND	ND	ND	ND	ND	ND	--	--	--	--
2.1	5	--	--	--	--	--	--	--	ND	ND	ND	ND
3.1	0.5	ND	ND	ND	ND	ND	ND	ND	--	--	--	--
3.1	5	--	--	--	--	--	--	--	ND	ND	ND	ND
4.1	0.5	0.88	0.41	0.79	1.00	1.20	1.80	ND	--	--	--	--
4.1	3	ND	ND	ND	ND	ND	ND	ND	--	--	--	--
4.1	5	--	--	--	--	--	--	--	ND	ND	ND	ND
4.1X	0.5	ND	ND	ND	ND	ND	ND	ND	--	--	--	--
4.1N	0.5	ND	ND	ND	ND	ND	ND	ND	--	--	--	--
4.1S	0.5	ND	ND	ND	ND	ND	ND	ND	--	--	--	--
4.1E	0.5	ND	ND	ND	ND	ND	ND	ND	--	--	--	--
4.1W	0.5	ND	ND	ND	ND	ND	ND	ND	--	--	--	--
5.1	0.5	ND	ND	ND	ND	ND	ND	ND	--	--	--	--
5.1	5	--	--	--	--	--	--	--	ND	ND	ND	ND
6.1	0.5	ND	ND	ND	ND	ND	ND	ND	--	--	--	--
6.1	3	ND	ND	ND	ND	ND	ND	ND	--	--	--	--
6.1	5	--	--	--	--	--	--	--	ND	ND	110	ND
1.2	0.5	ND	ND	ND	ND	ND	ND	ND	--	--	--	--
1.2	5	--	--	--	--	--	--	--	ND	0.009	14	ND
2.2	0.5	ND	ND	ND	ND	ND	ND	ND	--	--	--	--
2.2	3	ND	ND	ND	ND	ND	ND	ND	--	--	--	--
2.2	5	--	--	--	--	--	--	--	ND	ND	ND	ND
3.2	0.5	ND	ND	ND	ND	ND	ND	ND	--	--	--	--
3.2	5	--	--	--	--	--	--	--	ND	ND	ND	ND
4.2	0.5	ND	ND	ND	ND	ND	ND	1.50	--	--	--	--
4.2	3	ND	ND	ND	ND	ND	ND	ND	--	--	--	--
4.2	5	--	--	--	--	--	--	--	ND	ND	ND	ND
4.2X	0.5	ND	ND	ND	ND	ND	ND	ND	--	--	--	--
4.2N	0.5	ND	ND	ND	ND	ND	ND	ND	--	--	--	--
4.2S	0.5	ND	ND	ND	ND	ND	ND	ND	--	--	--	--
4.2E	0.5	ND	ND	ND	ND	ND	ND	ND	--	--	--	--
4.2W	0.5	ND	ND	ND	ND	ND	ND	ND	--	--	--	--
5.2	0.5	ND	ND	ND	ND	ND	ND	ND	--	--	--	--
5.2	5	--	--	--	--	--	--	--	.008	ND	ND	ND
6.2	0.5	ND	ND	ND	ND	ND	ND	ND	--	--	--	--
6.2	3	ND	ND	ND	ND	ND	ND	ND	--	--	--	--
6.2	5	--	--	--	--	--	--	--	ND	ND	ND	ND

(1) Only those SVOCs and VOCs that were detected in any of the samples are included in the table.
(2) SVOCs = Semivolatile Organic Compounds using USEPA method 8270
(3) VOCs = Volatile Organic Compounds using USEPA method 8240
(4) TRPH = Total Recoverable Petroleum Hydrocarbons using USEPA method 418.1
(5) TVH = Total Volatile Hydrocarbons using USEPA method 8015 modified
(6) ND = Not detected
(7) -- = Not Tested

TABLE 2
Summary of Laboratory Results
South 6.5-Acre Site
Metals

All concentrations in milligrams per kilogram (mg/kg)

Boring	Depth (ft)	Total Metals (6010/7000)																		WET Metals	
		Sb	As	Ba	Be	Cd	Cr	Cr6	Co	Cu	Pb	Hg	Mo	Ni	Se	Ag	Tl	V	Zn	Pb	Hg
1.1	0.5	ND	2.2	110	ND	ND	17	ND	8.8	21	31	ND	ND	13	ND	ND	ND	32	87	--	--
2.1	0.5	ND	2.9	96	ND	ND	12	ND	7.7	23	30	2.1	ND	9.2	ND	ND	ND	26	82	--	--
2.1	3	ND	2.1	160	0.49	ND	22	--	13	23	4.6	ND	ND	15	ND	ND	ND	49	62	--	--
3.1	0.5	ND	4.8	82	0.49	ND	13	ND	10	12	10	ND	ND	11	ND	ND	ND	35	26	--	--
4.1	0.5	ND	2.9	240	0.46	ND	22	ND	12	54	74	0.6	ND	16	ND	ND	ND	46	230	--	--
4.1	3	ND	ND	130	0.43	ND	19	--	11	20	9.6	0.7	ND	14	ND	ND	ND	46	56	--	--
5.1	0.5	ND	4.9	210	0.5	1.1	22	ND	12	41	120	ND	ND	17	ND	ND	ND	43	250	--	--
6.1	0.5	ND	7.9	180	0.44	ND	23	ND	10	27	66	ND	ND	18	ND	ND	ND	38	130	--	--
6.1	3	ND	ND	69	ND	ND	12	--	7.5	12	7.2	ND	ND	7.4	ND	ND	ND	32	43	--	--
1.2	0.5	ND	6.7	150	ND	1.7	17	ND	5.8	200	130	ND	ND	17	ND	ND	ND	21	280	--	--
2.2	0.5	2.3	7.1	260	0.55	3.6	32	ND	12	180	310	ND	ND	23	ND	ND	ND	45	530	13	ND
2.2	3	ND	ND	140	0.43	ND	21	--	12	24	10	ND	ND	14	ND	ND	ND	44	64	--	--
2.2X	0.5	--	--	--	--	--	--	--	--	--	108	--	--	--	--	--	--	--	--	--	--
2.2N	0.5	--	--	--	--	--	--	--	--	--	188	--	--	--	--	--	--	--	--	--	--
2.2S	0.5	--	--	--	--	--	--	--	--	--	100	--	--	--	--	--	--	--	--	--	--
2.2E	0.5	--	--	--	--	--	--	--	--	--	230	--	--	--	--	--	--	--	--	--	--
2.2W	0.5	--	--	--	--	--	--	--	--	--	338	--	--	--	--	--	--	--	--	--	--
3.2	0.5	5.3	4.8	180	0.49	1.6	26	ND	9.9	80	100	0.5	ND	19	ND	ND	ND	38	220	--	--
4.2	0.5	ND	3.8	170	ND	ND	18	ND	8.2	66	140	0.6	ND	14	ND	ND	ND	32	230	--	--
4.2	3	ND	ND	120	ND	ND	18	--	10	18	6.7	ND	ND	12	ND	ND	ND	40	56	--	--
5.2	0.5	ND	5.9	260	0.56	2.4	25	ND	11	140	250	0.35	ND	22	ND	ND	ND	38	380	15	--
5.2X	0.5	--	--	--	--	--	--	--	--	--	293	--	--	--	--	--	--	--	--	--	--
5.2N	0.5	--	--	--	--	--	--	--	--	--	329	--	--	--	--	--	--	--	--	--	--
5.2S	0.5	--	--	--	--	--	--	--	--	--	161	--	--	--	--	--	--	--	--	--	--
5.2E	0.5	--	--	--	--	--	--	--	--	--	259	--	--	--	--	--	--	--	--	--	--
5.2W	0.5	--	--	--	--	--	--	--	--	--	221	--	--	--	--	--	--	--	--	--	--
6.2	0.5	ND	ND	110	0.42	ND	16	ND	10	18	4	ND	ND	11	ND	ND	ND	37	57	--	--
6.2	3	ND	ND	130	0.42	ND	20	--	13	18	3.7	ND	ND	13	ND	ND	ND	50	59	--	--

(1) Total Metals = Metals concentration in soil using USEPA methods 6010/7000
(2) WET Metals = Metals concentration in extract using California Waste Extraction Test (WET) method
(3) ND = Not Detected
(4) -- = Not Tested

TABLE 3
Summary of Laboratory Results
North 6.5-Acre Site
Organics

All concentrations in milligrams per kilogram (mg/kg)

Boring	Depth (feet)	SVOCs (8270) All Analytes	VOCs (8240) All Analytes	TRPH (418.1)	TVH (8015M)
1.3	0.5	ND	--	--	--
1.3	5	--	ND	25	ND
2.3	0.5	ND	--	--	--
2.3	5	--	ND	195	ND
3.3	0.5	ND	--	--	--
3.3	5	--	ND	50	ND
4.3	0.5	ND	--	--	--
4.3	5	--	ND	28	ND
5.3	0.5	ND	--	--	--
5.3	5	--	ND	43	ND
6.3	0.5	ND	--	--	--
6.3	5	--	ND	32	ND
1.4	0.5	ND	--	--	--
1.4	5	--	ND	25	ND
2.4	0.5	ND	--	--	--
2.4	5	--	ND	43	ND
3.4	0.5	ND	--	--	--
3.4	5	--	ND	28	ND
4.4	0.5	ND	--	--	--
4.4	5	--	ND	75	ND
5.4	0.5	ND	--	--	--
5.4	5	--	ND	28	ND
6.4	0.5	ND	--	--	--
6.4	5	--	ND	18	ND

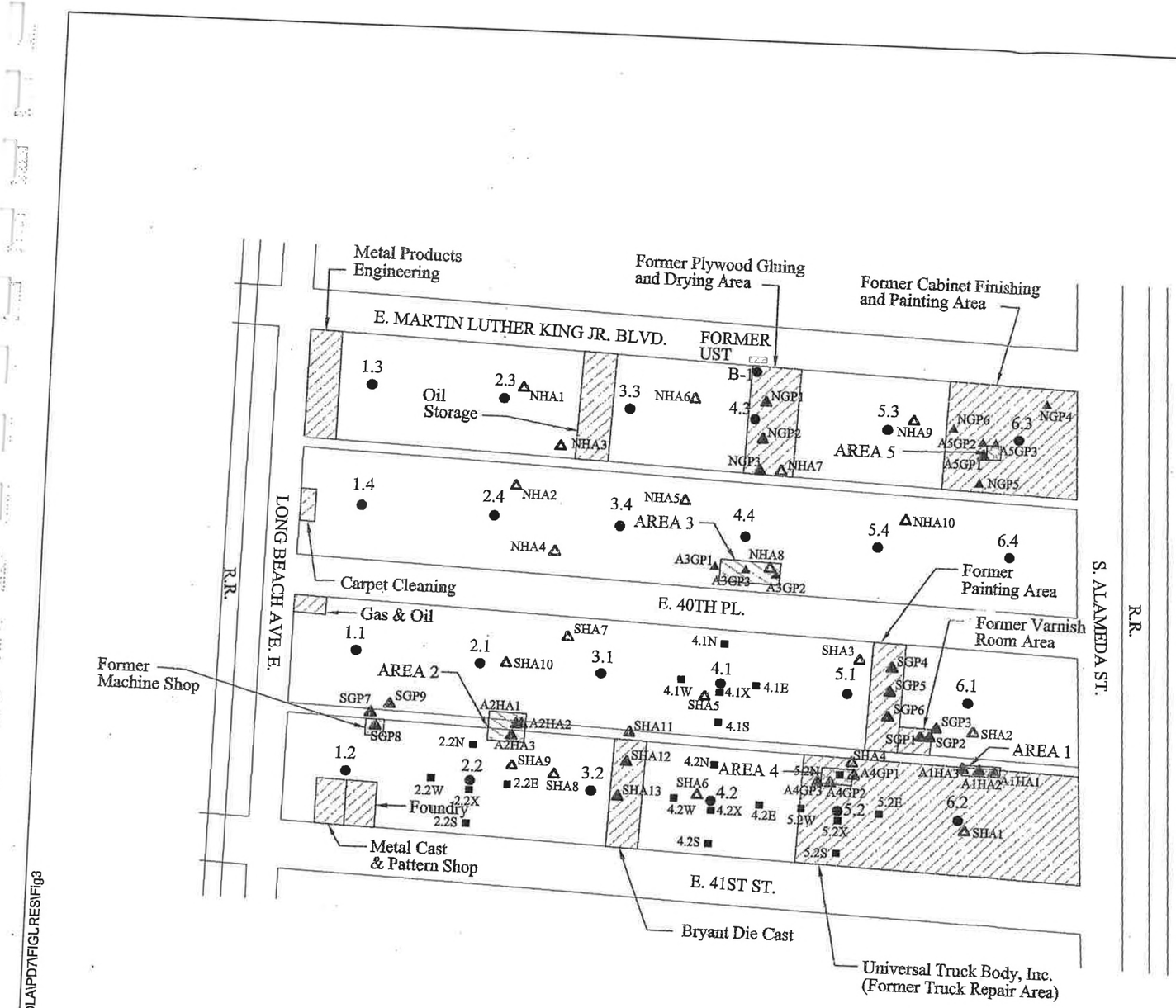
(1) SVOCs = Semivolatile Organic Compounds using USEPA method 8270
(2) VOCs = Volatile Organic Compounds using USEPA method 8240
(3) TRPH = Total Recoverable Petroleum Hydrocarbons using USEPA method 418.1
(4) TVH = Total Volatile Hydrocarbons using USEPA method 8015 Modified
(5) ND = Non-detect
(6) -- = Not Tested

TABLE 4
Summary of Laboratory Results
North 6.5-Acre Site
Metals

All concentrations in milligrams per kilogram (mg/kg)

Boring	Depth (ft)	Sb	As	Ba	Be	Cd	Cr6	Cr	Co	Cu	Pb	Hg	Mo	Ni	Se	Ag	Tl	V	Zn
1.3	0.5	ND	1.5	151	ND	ND	ND	14	8	41	90	ND	ND	11	0.3	ND	ND	27	181
2.3	0.5	ND	1.7	183	ND	ND	ND	17	10	54	523	ND	ND	13	0.2	ND	ND	36	175
3.3	0.5	ND	1.3	169	ND	ND	ND	17	10	32	77	ND	ND	57	0.3	ND	ND	37	313
4.3	0.5	ND	1.5	216	ND	ND	ND	17	9	48	195	ND	ND	13	0.3	ND	ND	33	238
5.3	0.5	ND	0.3	135	ND	ND	ND	15	9	19	22	ND	ND	12	0.3	ND	ND	32	67
6.3	0.5	ND	1.1	117	ND	ND	ND	14	9	15	ND	ND	ND	11	ND	ND	ND	32	49
1.4	0.5	ND	1.2	118	ND	ND	ND	13	8	16	ND	ND	ND	10	0.7	ND	ND	31	43
2.4	0.5	ND	0.8	134	ND	ND	ND	15	10	19	ND	ND	ND	11	0.3	ND	ND	34	54
3.4	0.5	ND	1.4	113	ND	ND	ND	11	6	32	49	ND	ND	10	ND	ND	ND	23	117
4.4	0.5	ND	ND	191	ND	ND	ND	20	10	152	28	ND	ND	15	0.2	ND	ND	39	329
5.4	0.5	ND	0.5	165	ND	ND	ND	17	11	21	3	ND	ND	13	0.3	ND	ND	41	69
6.4	0.5	ND	0.2	140	ND	ND	ND	16	11	20	5	ND	ND	13	0.3	ND	ND	39	60

(1) Metals = Metals using USEPA methods 6010/7000
(2) ND = Not Detected



LEGEND

- = AREAS OF POTENTIAL CONCERN
- = GEOPROBE SOIL SAMPLE LOCATION (PACIFIC EDGE 2003)
- = HAND AUGER SOIL SAMPLE LOCATION (PACIFIC EDGE 2003)
- = SUBSURFACE SOIL SAMPLE LOCATION (HARTCROWSER, 1994 & 1995)
- = SURFACE SOIL SAMPLE LOCATION (HARTCROWSER, 1995)

N:\P\POLA\PD7\FIG\FIG.RESI\Fig3

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JENKINS ENVIRONMENTAL ASSOCIATES

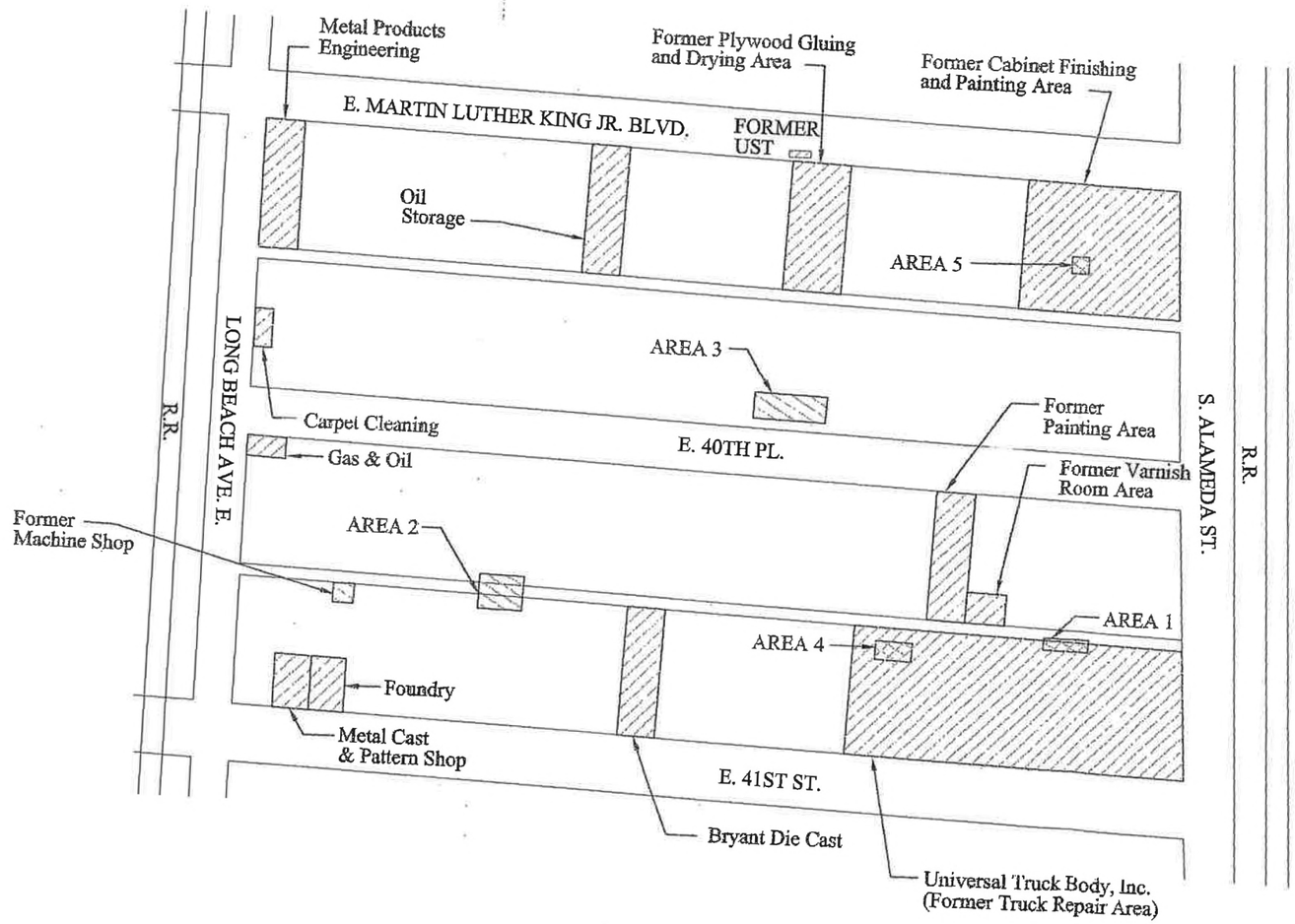
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PRIVILEGED AND CONFIDENTIAL
ATTORNEY-CLIENT PRIVILEGED AND
ATTORNEY WORK PRODUCT DOCTRINE

LANCER SITE
LOS ANGELES, CALIFORNIA

Figure 3
BORING LOCATIONS

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LEGEND

▨ = AREAS OF POTENTIAL CONCERN

N:\PIPOLA\PD7\FIGURES\Fig2

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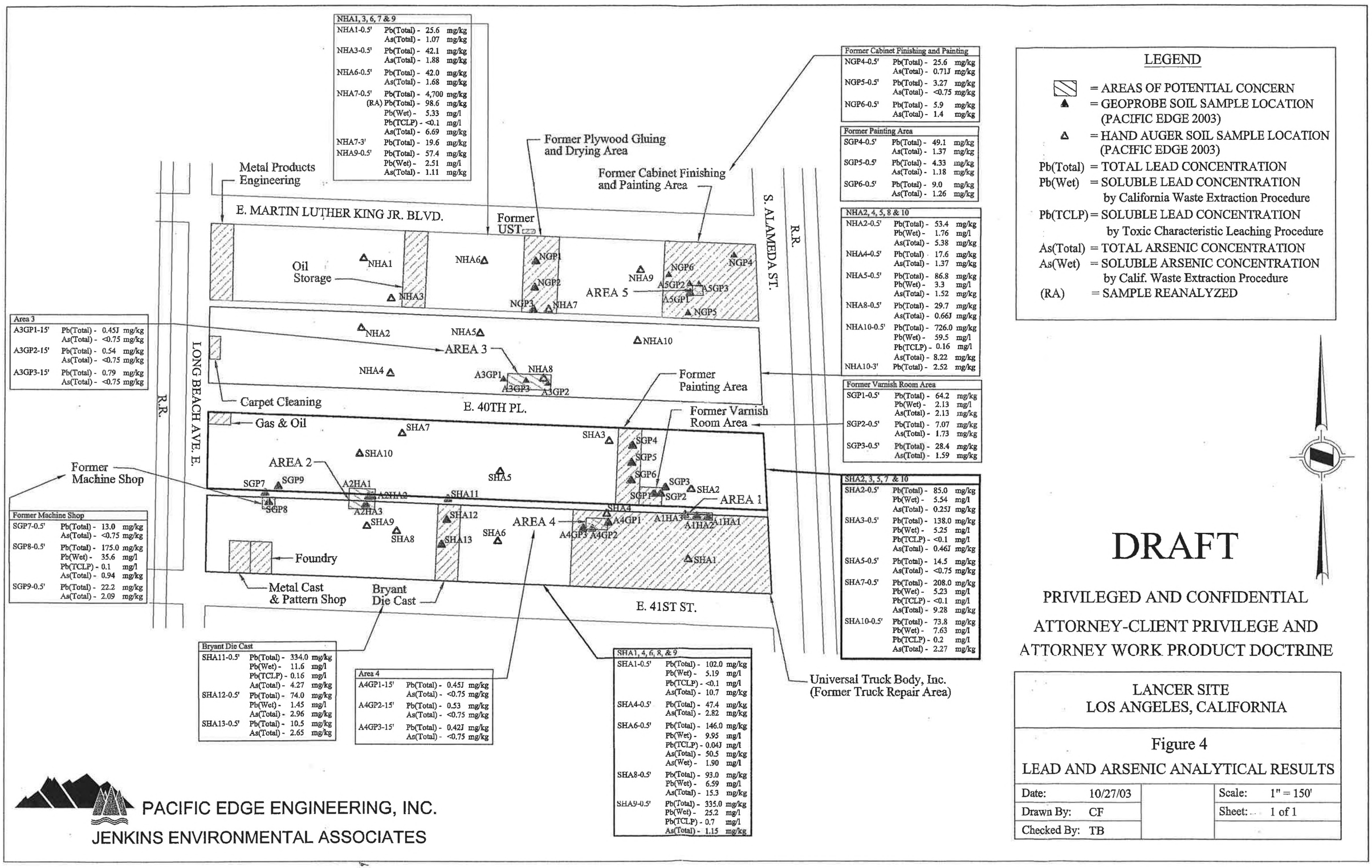
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LANCER SITE
LOS ANGELES, CALIFORNIA

Figure 2
SITE MAP

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LANCER SITE
LOS ANGELES, CALIFORNIA

Figure 4

LEAD AND ARSENIC ANALYTICAL RESULTS

Date:	10/27/03		Scale: 1" = 150'
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Checked By:	TB		

APPENDIX E

SITE INVESTIGATION REPORT – LANCER SITE, OCTOBER 29, 2003

PRIVILEGED AND CONFIDENTIAL
ATTORNEY-CLIENT PRIVILEGE AND
ATTORNEY WORK PRODUCT DOCTRINE

SITE INVESTIGATION REPORT

October 29, 2003

Performed at:

LANCER SITE

BETWEEN SOUTH ALAMEDA STREET AND EAST LONG BEACH AVENUE
EAST 41st STREET AND EAST MARTIN LUTHER KING JR. BOULEVARD,
LOS ANGELES, CALIFORNIA 90731

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Prepared for:

PORT OF LOS ANGELES
425 S. PALOS VERDES STREET
SAN PEDRO, CA 90731

ADP Number 930319-559
Agreement Number 2255
Project Directive 7

Performed by:

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22772 Centre Drive, Suite 230
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In Association with:

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J E A

11749 Capri Drive
Whittier, CA 90601

TABLE OF CONTENTS

Section **Page**

1.0 EXECUTIVE SUMMARY 1
1.1 Investigation Rationale and Overview 1
1.2 Analytical Results Summary and Conclusions 2

2.0 INTRODUCTION 5
2.1 Site Location 5
2.2 Site Description 5
2.3 Background 6

3.0 SITE INVESTIGATION 8
3.1 Investigation Areas 8
3.2 Soil Sampling 9
3.3 Soil Analytical 10

4.0 ANALYTICAL RESULTS 11
4.1 TPH Full Carbon Chain (EPA Method 8015M) 11
4.2 SVOCs (EPA Method 8270C) 11
4.3 VOCs (EPA Methods 5035/8260B) 11
4.4 Total Metals (CCR Title 22 Metals) 12
4.5 Hexavalent Chromium (EPA Method 7199 with alkaline digestion) 13
4.6 Organochlorine Pesticides (EPA Method 8081A) 13
4.7 PCBs (EPA Method 8082) 13
4.8 Herbicides (EPA Method 8151) 14

5.0 DISCUSSION OF RESULTS AND CONCLUSIONS 15
5.1 TPH Full Carbon Chain (EPA Method 8015M) 15
5.2 SVOCs (EPA Method 8270C) 15
5.3 VOCs (EPA Methods 5035/8260B) 15
5.4 Total Metals (CCR Title 22 Metals) 15
5.4.1 Lead 15
5.4.2 Arsenic 16
5.4.3 Barium, Copper, and Zinc 17
5.5 Hexavalent Chromium (EPA Method 7199 with alkaline digestion) 17
5.6 Organochlorine Pesticides (EPA Method 8081A) 17
5.7 PCBs (EPA Method 8082) 17
5.8 Herbicides (EPA Method 8151) 18
5.9 Investigation Status at Potential Areas of Concern 18
5.10 General Soil lithology 18

6.0 LIMITATIONS 20

7.0 REFERENCES 21

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(949) 470-1937; (949) 470-0943 (FAX)

TABLES

Table 1	Potential Areas of Chemical Concern
Table 2	Summary of Soil Sampling and Analyses
Table 3	8015M TPH Full Carbon Chain Soil Quality Summary
Table 4a	8270C (Detected Analytes Only) Soil Quality Summary
Table 4b	8270C Soil Quality Summary
Table 5a	8260B (Detected Analytes Only) Soil Quality Summary
Table 5b	8260B Soil Quality Summary
Table 6	6010B Soil Quality Summary
Table 7	8081A Soil Quality Summary
Table 8	8151A Soil Quality Summary

FIGURES

Figure 1	Site Location Map
Figure 2	Site Map
Figure 3	Boring Locations
Figure 4	Lead and Arsenic Analytical Results

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APPENDICES

Appendix A	Assessor Parcel Maps
Appendix B	Sanborn Maps
Appendix C	Laboratory Analytical Reports and Chain-of-Custody Forms
Appendix D	Excerpts from HartCrowser's January 1995 Report
Appendix E	Soil Boring Logs

1.0 EXECUTIVE SUMMARY

This report presents the results of a surface and subsurface soil investigation performed by Pacific Edge Engineering, Inc. (Pacific Edge) on the LANCER site (Site) located in Los Angeles, California. The Site consists of approximately 13 acres and is bounded by East 41st Street on the south, East Martin Luther King Jr. Boulevard on the north, South Alameda Street on the east and East Long Beach Avenue on the west in the City of Los Angeles. The Site is bisected by East 40th Place. The area north of East 40th Place is referred to as the North Parcel with the area south of East 40th Place being the South Parcel. A site location map is presented as Figure 1. A detailed Site Map is presented as Figure 2.

The purpose of the investigation was to evaluate surface and subsurface soil for the presence of hazardous waste. A description of the investigation, analytical results, and conclusions is presented below.

1.1 INVESTIGATION RATIONALE AND OVERVIEW

Pacific Edge's approach for this soil investigation of the Site included the following key considerations:

- Previous assessments and investigations of the Site were performed by Montgomery Watson (Montgomery) in 1993 and HartCrowser, Inc. (HartCrowser) in 1994 and 1995. The findings of these previous reports are further discussed in Section 2.3. HartCrowser's investigation utilized a random grid sampling approach, which indicated elevated concentrations of total lead and arsenic in surface soil. Pacific Edge's investigation included additional sampling of surface and subsurface soil to 1) confirm elevated lead and arsenic concentrations in the surface soil, and 2) assess the areas of potential concern identified in previous evaluations. Copies of Sanborn Maps (also known as Fire Insurance Maps) for the Site were used to locate the areas of potential concern identified in previous evaluations. Upon review of the 1920, 1949, 1953, 1954, 1958, 1960, 1963, and 1968 Sanborn Maps, additional areas of potential concern were identified.

- The suite of analytical tests performed was expanded (when compared to previous evaluations) and included the following chemicals based upon historical Site activities.

  - Total Petroleum Hydrocarbons (TPH) Full Carbon Chain
  - Semivolatile Organic Compounds (SVOCs)
  - Volatile Organic Compounds (VOCs)
  - CCR Title 22 Metals
  - Hexavalent Chromium
  - Organochlorine Pesticides and Polychloinated Biphenyls (PCBs)
  - Herbicides

- Analysis of the 0.5-foot (ft) depth soil sample for TPH, SVOCs, metals, hexavalent chromium, organochlorine pesticides and PCBs, and herbicides was considered to be representative of the surface soil. Deeper samples were only analyzed if the sample from a shallower depth showed an abnormally high chemical concentration, or if the feature being assessed was expected to impact at greater depths. Due to the typical disturbance of surface soil, and the associated volatilization of VOCs in disturbed soil, the 0.5-ft sample was not analyzed for VOCs.

1.2 ANALYTICAL RESULTS SUMMARY AND CONCLUSIONS

TPH compounds were detected at very low levels in a majority of samples. The highest TPH concentration for the sum of hydrocarbon compounds with carbon chain lengths of 7 to 44 (C7-C44) was 550 milligrams per kilograms (mg/kg) in a 0.5-ft soil sample. Most TPH compounds were detected in the C30+ range with minimal detections of TPH compounds below the 0.5-ft depth. None of the analytical results for shallow soil samples was high enough to justify the testing of deeper soil samples.

None of the analytical results for TPH indicate 1) any significant release of hydrocarbon based materials, or 2) levels which would cause the impacted soil to require removal from the Site based upon applicable rules and regulations.

SVOCs were not detected above laboratory reporting limits in a majority of soil samples, except that a few samples contained low levels of polynuclear aromatic hydrocarbons (PAHs) and phthalates (di-n-butylphthalate and bis(2-ethylyhexyl)phthalate).

None of these samples contained measurable concentrations of SVOCs (PAHs or phthalates) that 1) were above their respective USEPA Region 9 Preliminary Remedial Goals (PRGs) for industrial soil, or 2) would cause the soil to be classified as a hazardous waste based upon applicable rules and regulations.

VOCs (acetone, benzene, and toluene) at concentrations below or near the analytical reporting limits were detected in most 5-ft and 10-ft depth soil samples. Analytical method blanks did not detect these VOCs. None of the 15-ft samples contained VOCs above laboratory reporting limits. Tetrachloroethene was detected above laboratory reporting limits at concentrations of 1.2 to 5.4 microgram per kilogram (ug/kg) in a few soil samples.

All VOC concentrations were well below the respective PRG for industrial soil and would not be classified as a hazardous waste based upon applicable rules and regulations.

Metals at various concentrations were detected in all soil samples. Elevated levels of total lead and arsenic were reported in a number of samples from the site. A few samples contained elevated levels of barium, copper, and/or zinc. Results and conclusions associated with lead, arsenic, barium, copper, and zinc are presented below.

- **Lead** - One soil sample from the North Parcel had a concentration of total lead (4,700 mg/kg) above the Total Threshold Limiting Concentration (TTLC) of 1,000 mg/l and the PRG for industrial soil of 750 mg/kg. Re-analysis of the soil sample for lead showed a total lead concentration of 98.6 mg/kg, which indicated a metal flake or artifact was likely present in the first sample. The result of the California Waste Extraction Test (WET) procedure for soluble lead on the sample that contained 4,700 mg/kg of total lead was 5.33 mg/l, which is marginally above the Soluble Threshold Limiting Concentration (STLC) of 5 milligram per liter (mg/l) concentration. When the same sample was subjected to the Toxicity Characteristic Leaching Procedure (TCLP), the soluble lead concentration detected (0.164 mg/l) was below the TCLP limit of 5 mg/l.

  At five locations in the North Parcel and twelve locations in the South parcel, the total lead concentrations exceeded 10 times (10x) the STLC of 5 mg/l. The soil samples that exceeded 10x the STLC for lead were subjected to the WET procedure for soluble lead. At two locations in the North Parcel and ten locations in the South Parcel the soluble lead exceeded 5 mg/l based upon the WET

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procedure. Most of the soluble lead concentrations were marginally above the 5 mg/l concentration except that one location in North Parcel showed a soluble lead value of 59.5 mg/l and two locations in the South parcel showed concentrations of 35.6 mg/l and 25.2 mg/l.

At two locations in the North Parcel and seven locations in the South parcel, the total lead concentrations exceeded 20x the TCLP concentration of 5 mg/l. None of the soil samples that were subjected to the TCLP exceeded the 5 mg/l concentration for soluble lead.

Considering that the elevated lead concentrations are distributed over a relatively wide area of both parcels, the presence of lead may be due to urban background contributions, rather than a direct chemical release from a historic operation and/or waste management feature. The total lead findings for this investigation are consistent with those previously reported by HartCrowser (1994). Further, the concentrations of lead found at the Site in this investigation are generally consistent with the urban and regional background values quoted by HartCrowser (1994 and 1995). Tables and figures from HartCrowser's report are included in Appendix D.

It is reasonable to conclude in general that the lead concentrations at the Site do not exceed the PRG for industrial soil. However, soluble lead concentrations exceeding the STLC of 5 mg/l as measured by the WET procedure may be classified as a California hazardous waste (if the soil were to be excavated) for purposes of transportation and disposal.

- **Arsenic** – This metal was detected above the detection limit of 0.75 mg/kg in the majority of samples. One sample had a total arsenic concentration of 50.5 mg/kg, which slightly exceeded 10x the STLC of 5 mg/l for arsenic. When this sample was subjected to the WET procedure for the determination of soluble arsenic, the soluble arsenic concentration was 1.9 mg/l. Additionally, a number of soil samples contained total arsenic at levels exceeding the PRG of 1.6 mg/kg for industrial soil.

  Considering that the elevated arsenic concentrations are distributed over a relatively wide area of both parcels, the presence of arsenic (much like lead) may be due to urban background contributions, rather than a direct chemical release from a historical operation and/or waste management feature. As was the case with total lead, the total arsenic findings for this investigation are consistent with those previously reported by HartCrowser (1994 and 1995). Further, the concentrations of arsenic found at the Site in this investigation are generally consistent with the regional background value of 8.3 mg/kg quoted by HartCrowser (1995).

  None of the total or soluble arsenic concentrations detected would cause the soil to be classified as a California or USEPA hazardous waste (if the soil were to be excavated) for purposes of transportation and disposal. Exceedances of arsenic concentrations above the PRG for industrial soil may require that the soil be further evaluated for potential environmental concerns. However, it should also be noted that EPA Region 9 (author of the PRGs) recognizes that some PRG levels have been set at or below typical background concentrations. An example of this is naturally occurring arsenic in soils that frequently exceed the PRG that EPA Region 9 has established for arsenic. EPA has at times used the non-cancer PRG of 22 mg/kg to evaluate sites, recognizing that this value tends to be above background levels yet still falls within the range of soil concentration (0.39-39 mg/kg) that equates to EPA's acceptable cancer risk range.

- **Barium, Copper, and Zinc** - One surface sample in the North Parcel contained total barium and zinc concentrations of 11,300 and 23,700 mg/kg, respectively, which exceeded their respective TTLCs of 10,000 and 5,000 mg/kg. Re-analysis of this sample showed lower total barium and zinc concentrations of 2,880 and 2,490 mg/kg, respectively. Analysis of the 3-ft sample at this location showed total concentrations of barium and zinc at 143.0 and 58.8 mg/kg, respectively.

  The surface soil sample was subjected to the WET procedure for soluble barium and zinc. The result of the WET procedure for soluble barium and zinc on NHA10-0.5' was 23.4 mg/l and 309.0 mg/l, respectively. Further, since the total barium concentration in NHA10-0.5' exceeded 20x the TCLP concentration of 100 mg/l, the sample was subjected to the TCLP. The resulting soluble barium concentration was 1.7 mg/l, which is below the TCLP of 100 mg/l.

  One soil sample in the North Parcel contained a total copper concentration of 474.0 mg/kg, which exceeded 10x the STLC of 25 mg/l. This soil samples was subjected to the WET procedure for soluble copper. The soluble lead concentration was 3.13 mg/l, which is below the STLC value for this compound.

  It is reasonable to conclude in general that the barium, copper, and zinc concentrations at the Site do not exceed their respective PRG for industrial soil. However, total barium, soluble barium, and total zinc concentrations in sample NHA10-0.5 may be classified as a California hazardous waste (if the soil were to be excavated) for purposes of transportation and disposal.

Hexavalent Chromium was detected at very low levels in 31 of 35 samples over a wide area of the Site. All of these results are identified as "J" (i.e. the data is qualifiable but not quantifiable) values by the laboratory. The concentrations of hexavalent chromium reported were 1) well below the PRG for industrial soil, and 2) would not be classified as a hazardous waste based upon applicable rules and regulations

Organochlorine Pesticides were detected at very low levels in four samples over a wide area of the Site. The concentrations of the organochlorine pesticides reported were well below the respective PRGs for industrial soil, and would not be classified as a hazardous waste based upon applicable rules and regulations.

PCB (arochor-1254) was detected at very low levels in two samples located in the southwestern quarter of the Site. The concentrations of the PCBs reported were well below the PRG for industrial soil and would not be classified as a hazardous waste based upon applicable rules and regulations.

Herbicides were not detected above laboratory reporting limits in any of the samples analyzed.

Inaccessible areas of the Site were fenced-off and secured by locked gates. Because these target areas could not be investigated, assessment should be conducted in the future when access is available.

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2.0 INTRODUCTION

This report presents the results of a surface and subsurface soil investigation performed by Pacific Edge on the Site located in Los Angeles, California. The purpose of the investigation was to evaluate surface and subsurface soils for the presence of hazardous waste. The sampling activities were performed on August 28, September 2, September 4, and September 9, 2003. This work was conducted at the request of Port of Los Angeles (Port) Environmental Management Division (EMD) and the City Attorney's Office.

2.1 SITE LOCATION

The Site consists of approximately 13 acres and is bounded by East 41st Street on the south, East Martin Luther King Jr. Boulevard on the north, South Alameda Street on the east and East Long Beach Avenue on the west in the City of Los Angeles. The Site is bisected by East 40th Place. A site location map is presented as Figure 1. A map of the Site, which includes details of the Site, is presented as Figure 2.

Assessor parcel maps (5117-19, 5117-20, and 5117-21; all dated 1996) and information obtained from the County of Los Angeles web site (http://assessormap.lacountyassessor.com/mapping) on August 13, 2003 indicates that the current addresses for the Site include:

- 1701, 1715, 1727, 1751, 1757, 1763, 1769, 1773, and 1801 41st Street
- 1720, 1721, and 1883 40th Street
- 4051 and 4073 Alameda Street
- 1838 Martin Luther king Jr. Boulevard

Addresses were not specified for all parcels on the County of Los Angeles web site. Copies of the 1996 Assessor Parcel Maps are included in Appendix A.

2.2 SITE DESCRIPTION

An initial site visit was performed on August 6, 2003. The Site, approximately 13 acres in size, is divided into two relatively equal portions by East 40th Place. Access by vehicle to the Site is on 40th Place off of East Long Beach Avenue. The area north of East 40th Place is referred to as the North Parcel with the area south of East 40th Place being the South Parcel. Additional access points for pedestrians were noted periodically along the fenced perimeter of the Site.

The entire 13 acres has been divided up into garden plots administered by the Los Angeles Regional Food Bank. Access to each of the plots is by narrow paths that dissect the Site. A small sign, titled Urban Garden Lot, with a name and lot number was affixed to some of the garden plots. Each plot was fenced with the majority of the lots being locked.

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2.3 BACKGROUND

Background information for the Site was obtained from documents supplied by the Port EMD. The documents reviewed and a summary of background information from these documents includes:

Preliminary Site Assessment, Lancer Site, Los Angeles, California, dated April 1993, prepared by Montgomery Watson (Montgomery) contained the following findings:

- Light industrial operations, which may have included solvents, paints, and other flammable materials, began in the 1920s on both 6.5-acre parcels.
- Site demolition activities in 1990 in the vicinity of four areas of surficial discoloration resulted in the removal of two clarifiers, a concrete pit, and discolored soil. Montgomery reports that the vertical extent of remediation appears to be adequate based upon confirmation samples at the bottom of the excavation. Further, Montgomery indicates that the lateral extent of remediation was apparently determined by field observations without confirmation sampling.
- An underground storage tank (UST) may be located at the former Universal Truck Body, also called Utility Trailer Sales Company, property in the southeast corner of the South 6.5-acre parcel, based upon a City of Los Angeles Fire Department violation.
- A UST is likely located beneath the north 6.5-acre parcel, on the south curb of Martin Luther King Jr. Blvd., approximately 388 feet west of South Alameda.

Preliminary Health Risk Evaluation of Gardening Uses, Lancer Site, dated September 16, 1994, prepared by HartCrowser, Inc. HartCrowser collected soil samples at the South 6.5-acre parcel. The samples were analyzed for metals and semivolatile organics. A summary of HartCrowser's findings were as follows:

- Chemicals detected in soils include metals and SVOCs.
- Metals and PAH concentrations are typical of urban soils.
- Lead is the primary concern for potential health impacts.
- Lead levels over most of the property are acceptable for gardening, but a limited number of samples from both parcels exceeded acceptable limits.
- Concentrations of other metals appear to be acceptable.
- SVOCs do not appear to be a major concern, but confirmation sampling is needed.
- HartCrowser recommended the confirmatory sampling for elevated lead and semivolatiles be performed.

Preliminary Health Risk Evaluation, Lancer Site, Los Angeles, California, dated January 18, 1995, prepared by HartCrowser, Inc. HartCrowser collected and analyzed samples on all parcels for metals, SVOCs, VOCs, total recoverable petroleum hydrocarbons, and total volatile hydrocarbons. HartCrowser's findings were as follows:

- Shallow soil at the Lancer Site showed elevated concentrations of metals and SVOCs that are above published background levels. No indication of chemical spills or other industrial releases was determined to have caused the elevated levels of contaminants.
- Detected chemicals pose minimal health risks if the following recommendations are implemented: a) future construction activities should utilize appropriate personal protective equipment, and b) diesel product should be removed from the identified UST.
- A UST fill-port was identified on the North Parcel in the sidewalk area adjacent to Martin Luther King Boulevard. Additional USTs are not likely to be present beneath the 6.5-acre parcels, based on

the findings of the geophysical survey and information provided in Montgomery's 1993 Preliminary Site Assessment (HartCrowser, 1995).

Underground Storage Tank Closure Report, Port of Los Angeles, Lancer Site, 1786 East Martin Luther King Jr. Boulevard, Los Angeles, California, dated June 1996, prepared by HartCrowser, Inc.

- HartCrowser closed the subject UST in accordance with the City of Los Angeles Fire Department requirements.

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3.0 SITE INVESTIGATION

Pacific Edge's approach and rationale for this soil investigation included the following key considerations:

- HartCrowser's investigation (1994) utilized a random grid sampling approach, which indicated elevated concentrations of total lead and arsenic in surface soil. Based upon a review of previous investigations and historical information, Pacific Edge proposed:
  - Additional sampling of surface and subsurface soil using a similar grid sampling approach to confirm the elevated lead and arsenic concentrations, and
  - Assess other areas of potential concern.

- Analysis of the 0.5-foot (ft) depth soil sample for TPH, SVOCs, metals, hexavalent chromium, organochlorine pesticides and PCBs, and herbicides was considered to be representative of the surface soil. Deeper samples were only analyzed if the sample from a shallower depth showed an abnormally high chemical concentration, or if the feature being assessed was expected to impact at greater depths. Due to the typical disturbance of surface soil, and the associated volatilization of chemicals, the 5.0 ft sample was analyzed to represent the concentration of VOCs present at the Site in near surface soil.

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3.1 INVESTIGATION AREAS

The areas of potential environmental concern at the Site were identified in the environmental documents supplied by the POLA (see Section 2.3). Areas previously identified by Montgomery and/or HartCrowser as potential chemical source areas are included in Table 1. A summary of these areas is presented below:

- Area 1 – Surface Soil Discoloration
- Area 2 – Surface Soil Discoloration
- Area 3 – Clarifier
- Area 4 - Clarifier
- Area 5 – Concrete Lined Pit
- Bryant Die Casting (Former Die Casting Area), 1763 East 41st Street
- Universal Truck Body, Inc. (former truck repair area), 1845 East 41st Street
- Metal Products Engineering, 4000 East Long Beach Avenue
- Former Painting Area, 1808 40th Place
- Former Varnish Room Area, 1814 40th Place
- Former Plywood Gluing and Drying Area, 1786 Martin Luther King Jr. Boulevard
- Former Cabinet Finishing & Painting Area, 1840 Martin Luther King Jr. Boulevard
- Adjacent Oil Pipelines located along Long Beach Avenue
- Elevated Lead and polynuclear aromatic hydrocarbons detected in 1994 grid samples.

Copies of Sanborn Maps (also known as Fire Insurance Maps) for the Site were requested from Environmental Data Resources, Inc. (EDR) and were used to locate areas with addresses. Upon review of the 1920, 1949, 1953, 1954, 1958, 1960, 1963, and 1968 Sanborn Maps, the following additional potential source areas were identified:

- Carpet Cleaning - between 4014 and 4022 East Long Beach Avenue (1949 Sanborn Map)
- Oil Storage - between 1750 and 1770 Martin Luther King, Jr. Boulevard (formerly East Santa Barbara Avenue; 1949 Sanborn Map)
- Metal Cast & Pattern Shop – 1707 and 1709 East 41st Street (1949, 1960, and 1963 Sanborn Map)
- Foundry – 1715 East 41st Street (1949 and 1960 Sanborn Map)
- Gas and Oil – 4050 East Long Beach Avenue (1963 Sanborn Map)

Figure 2 graphically presents these potential areas of concern. Copies of the Sanborn Maps are included in Appendix B.

3.2 SOIL SAMPLING

A total of 24 Geoprobe® and 32 handauger borings were installed on August 28, September 2, September 4, and September 9, 2003. Table 2 summarizes the areas of concern, boring identification numbers, sample depth intervals, and the analytical procedure(s) performed. Figure 3 graphically presents the boring locations.

In summary, the investigation consisted of the collection and/or analysis of 187 soil samples (collected from depths of 0.5 feet below ground surface (bgs) to 15 feet bgs. The soil samples were collected using a Geoprobe® or hand auger equipment. The soil samples were collected with 1-inch diameter decontaminated brass, stainless steel, or acetate sleeves. Sub-samples were collected from select sleeves with an Encore Sampler for intervals identified for volatile organic compound analyses. Two 5 gram and one 25 gram Encore soil sample were collected for each analysis by EPA Method 8260B. Encore samples were collected following procedures in accordance with the DTSC's Hazardous Material laboratory Standard Operating Procedure 732-S. The ends of all sample sleeves selected for analysis were covered with Teflon sheets and capped with tightly-fitting plastic caps. These sleeves and Encore sample containers were then properly labeled, stored on ice, and delivered to the laboratory under chain-of-custody procedures.

Excess soil from each sample interval was reserved for soil headspace screening and site lithologic logging in accordance with the Uniform Soil Classification System. For headspace analysis, a small amount of soil collected from each depth interval was removed from the remaining sample sleeves and sealed in a Ziplock™ bag. After drilling and sampling of the borehole was completed, the Ziplock™ bags were placed in the sun for approximately 10 minutes. Headspace organic vapor concentrations were then measured by inserting the probe of a photoionization detector (PID) into the bag. PID readings were recorded on the boring logs. The remainder of the soil was observed for lithologic logging.

All equipment used for sampling was decontaminated between uses by washing with detergent (Alconox™), followed by a rinse in tap water and a final distilled water rinse.

Geoprobe® boreholes were properly abandoned by filling the borehole with bentonite chips, hydrating the chips with water, and resurfacing with material to match the existing surface. Hand auger borings were abandoned by replacing the removed soil into the borehole, compacting the soil, and resurfacing with material to match the existing surface.

3.3 SOIL ANALYTICAL

Soil samples were selected for laboratory analysis based on predetermined sample intervals, which were subject to field modification based on PID readings and/or observed discoloration or odor. Soil samples selected for analysis (see Table 2) were analyzed using one or more of the following methods:

- TPH Full Carbon Chain (EPA Method 8015M)
- SVOCs (EPA Method 8270C)
- VOCs (EPA Methods 5035/8260B)
- Total Metals (CCR Title 22 Metals)
- Hexavalent Chromium (EPA Method 7199 with alkaline digestion)
- Organochlorine Pesticides & PCBs (EPA Method 8081A/8082)
- Herbicides (EPA Method 8151)

Soluble metal concentrations were determined using the California Waste Extraction Test for metal constituents where the total metal concentration exceeds 10x the Soluble Threshold Limit Concentrations or 20x the Toxicity Characteristic Leaching Procedure limiting concentration.

Calscience Environmental Laboratories, Inc, a California State certified laboratory, located at 7440 Lincoln Way, Garden Grove, California performed the analytical methods on the soil samples. Laboratory analyses were performed consistent with USEPA Region 9's most recent guidance for non-CLP laboratories.

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4.0 ANALYTICAL RESULTS

The sections below provide a summary of the soil sample results. Tables 3 through 8 present soil analytical results. Calscience Environmental Laboratories, Inc, a California State certified laboratory, located at 7440 Lincoln Way, Garden Grove, California, performed the analytical methods on the soil samples. Laboratory analytical reports and chain-of-custody forms for the soil samples are included in Appendix C.

4.1 TPH FULL CARBON CHAIN (EPA METHOD 8015M)

Table 3 presents the TPH concentrations in soil. A summary of the TPH results is presented below:

- Fifty-three (53) soil samples were analyzed for Total TPH (C7-C44) compounds. The samples were collected from depths of 0.5-ft bgs (20 samples), 5-ft bgs (9 samples), 10-ft bgs (15 samples), and 15-ft bgs (9 samples).
- Twenty-one (21) samples showed Total TPH concentrations above laboratory reporting limits, ranging from 6.8 to 550 mg/kg.
- Most TPH compounds detected were in the C30+ range and were present in the 0.5-ft samples.
- For samples analyzed from the depths below 0.5-ft bgs, TPH concentrations ranged from non detect to 6.9 mg/kg.

4.2 SVOCS (EPA METHOD 8270C)

Table 4a presents detected SVOC concentrations. Table 4b presents all SVOC compounds for the samples analyzed. A summary of the SVOC results is presented below:

- Twenty-six (26) soil samples were analyzed for SVOCs. The samples were collected from depths of 0.5-ft bgs (20 samples), 5-ft bgs (3 samples), and 15-ft bgs (3 samples).
- Twelve (12) of these soil samples, which were at the 0.5 ft depth, showed detectable quantities of SVOCs above laboratory reporting limits. No detectable quantities of SVOCs were found in the 5-ft bgs or 15-ft bgs soil samples analyzed.
- The compounds detected above laboratory reporting limits include benzo(a)anthracene, benzo(a)pyrene, benzo(b)fluoranthene, benzo(g,h,i)perylene, benzo(k)fluoranthene, bis(2-Ethylhexyl)phthalate, chrysene, di-n-butylphthalate, fluoranthene, indeno(1,2,3-c,d)pyrene, napthalene, phenanthrene, and pyrene. The detected concentrations are presented in Tables 4a and 4b.
- Some SVOC were reported as "J" values by the laboratory indicating that the analyte was detected above the Method Detection Limit (indicating the analyte can be qualified) but below the Reporting Limit (indicating the analyte is not quantifiable). The detected "J" value is an estimated concentration and is presented in Tables 4a and 4b.

4.3 VOCS (EPA METHODS 5035/8260B)

Table 5a presents detected VOC concentrations. Table 5b presents all VOC compounds for the samples analyzed. A summary of the VOC results is presented below:

- Fifty-three (53) soil samples were analyzed for VOCs. The samples were collected from depths of 5-ft bgs (29 samples), 10-ft bgs (15 samples), and 15-ft bgs (9 samples).
- Forty-one (41) of these samples showed detectable quantities of one or more VOCs above laboratory reporting limits.

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- The compounds detected above laboratory reporting limits are acetone, benzene, tetrachloroethene, and toluene. The detected concentrations are presented in Tables 5a and 5b.
- VOCs (acetone, benzene, and toluene) at concentrations below or near the analytical reporting limits were detected in most 5-ft depth soil samples. Analytical method blanks did not detect these VOCs.
- Tetrachloroethene was detected in the concentration range of 1.2 to 5.4 ug/kg in a few soil samples.
- Some VOCs (1,2,3-TCP, 2-butanone, and trichloroethene) were reported as "J" values by the laboratory indicating that the analyte was detected above the Method Detection Limit (indicating the analyte can be qualified) but below the Reporting Limit (indicating the analyte is not quantifiable). The detected "J" value is an estimated concentration and is presented in Tables 5a and 5b.

4.4 TOTAL METALS (CCR TITLE 22 METALS)

Table 6 presents the metal concentrations in soil. Figure 4 illustrates lead and arsenic concentrations in soil. A summary of the metal results is presented below:

- Forty-one (41 samples) were analyzed for total metals. The samples were collected from depths of 0.5-ft bgs (35 samples) and 15-ft bgs (6 samples). Two additional samples from a depth of 3-ft bgs were analyzed for selected metal compounds.
- Metals at various concentrations were detected in all soil samples.
- Soil sample NHA7-0.5' collected in the North Parcel contained a total lead concentration of 4,700 mg/kg, which exceeds its TTLC value of 1,000 mg/l. The 3 ft sample at this location contained a lead concentration of 19.6 mg/kg. NAH7-0.5' was re-analyzed (NAH7-0.5'RA) and the total lead concentration was reported by the laboratory to be 98.6 mg/kg, which is significantly below its TTLC value. The result of the WET procedure for soluble lead on the sample that contained 4,700 mg/kg of total lead was 5.33 mg/l, which is marginally above the STLC of 5 mg/l concentration. When the same sample was subjected to the TCLP, the soluble lead concentration detected (0.164 mg/l) was below the TCLP limit of 5 mg/l.
- At five locations in the North Parcel and twelve locations in the South Parcel, the total lead concentration exceeded 10x the STLC of 5 mg/l. These samples were subjected to the WET procedure for soluble lead, resulting in twelve samples exceeding the lead STLC value of 5mg/l (two samples from the North Parcel and ten samples from the South Parcel). Most of the soluble lead concentrations were marginally above the 5 mg/l concentration except that one location in North Parcel showed a soluble lead value of 59.5 mg/l and two locations in the South parcel showed concentrations of 35.6 and 25.2 mg/l.
- At two locations in the North Parcel and seven locations in the South Parcel, the total lead concentration exceeded 20x the TCLP value of 5 mg/l. These samples were subjected to the TCLP test and none of the results exceeded the TCLP value of 5 mg/l.
- The total arsenic concentration in soil sample SHA6-0.5' exceeded 10x the STLC of 5 mg/l. When this sample was subjected to the WET procedure, the soluble arsenic concentration was reported to be 1.9 mg/l. At five locations in the North Parcel and eighteen (18) locations in the South parcel, the total arsenic concentrations exceeded the PRG of 1.6 mg/kg for industrial soil.
- Soil sample NAH10-0.5'in the North Parcel at 0.5-ft contained total barium and zinc concentrations of 11,300 and 23,700 mg/kg, respectively, which exceed the TTLC value for barium and zinc. Re-analysis of this sample (NHA10-0.5'RA) showed a total barium and zinc concentrations of 2,880 and 2,490 mg/kg, respectively, which is below the TTLC values. Analysis of the 3-ft sample at this location showed concentrations of barium and zinc at 143.0 and 58.8 mg/kg, respectively.
- Soil sample NHA10-0.5' was subjected to the WET procedure due to an elevated concentration of barium and zinc and the TCLP test due to the elevated barium concentration. The barium results were

significantly below its STLC and TCLP values of 100 mg/l. The zinc results indicated a soluble zinc concentration of 309 mg/l, which exceeds its STLC value of 250 mg/l.

- One soil sample (NHA7-0.5') in the North Parcel contained a total copper concentration of 474.0 mg/kg, which exceeded 10x the STLC of 25 mg/l. This soil samples was subjected to the WET procedure for soluble copper. The soluble copper concentration was 3.13 mg/l, which is below the STLC value for this compound.
- Some metals were reported as "J" values by the laboratory indicating that the analyte was detected above the Method Detection Limit (indicating the analyte can be qualified) but below the laboratory reporting limit (indicating the analyte is not quantifiable). The detected "J" value concentrations are presented in Table 6.

4.5 HEXAVALENT CHROMIUM (EPA METHOD 7199 WITH ALKALINE DIGESTION)

Table 6 also presents the hexavalent chromium concentrations in soil. A summary of the metal results is presented below:

- Thirty-five (35) soil samples were analyzed for hexavalent chromium. All of these soil samples were collected from a depth of 0.5-ft bgs.
- Thirty-one (31) of these samples were reported to contain hexavalent chromium, ranging from 0.01 to 0.53 mg/kg. All of these results were identified as "J" values by the laboratory indicating that the analyte was detected above the method detection limit (indicating the analyte can be qualified) but below the Reporting Limit (indicating the analyte is not quantifiable). The detected "J" value concentrations are presented in Table 6.
- The remaining four samples were reported as non-detect above the laboratory reporting limit.

4.6 ORGANOCHLORINE PESTICIDES (EPA METHOD 8081A)

Table 7 presents the organochlorine pesticide concentrations in soil. A summary of these results are presented below:

- Twenty (20) soil samples were analyzed for organochlorine pesticides. All of these soil samples were collected from a depth of 0.5-ft bgs.
- Four (4) of these samples showed very low levels of organochlorine pesticides.
- The compounds detected above laboratory reporting limits include 4,4'-DDD, 4,4'-DDE, 4,4'-DDT, and Chlordane.
- Some pesticide compounds were reported as "J" values by the laboratory indicating that the analyte was detected above the Method Detection Limit (indicating the analyte can be qualified) but below the Reporting Limit (indicating the analyte is not quantifiable). The detected "J" value concentrations are presented in Table 7.

4.7 PCBS (EPA METHOD 8082)

Table 7 presents the PCB concentrations in soil. A summary of these results are presented below:

- Twenty (20) soil samples were analyzed for PCBs. All of these soil samples were collected from a depth of 0.5-ft bgs.
- Two (2) of these samples showed low levels of aroclor-1254 (170 ug/kg and 370 ug/kg) above laboratory reporting limits.

4.8 HERBICIDES (EPA METHOD 8151)

Table 8 presents the herbicide concentrations in soil. A summary of these results are presented below:

- Twenty (20) soil samples were analyzed for herbicides. All of these soil samples were collected from a depth of 0.5-ft bgs.
- None of the samples contained reportable concentrations of herbicide compounds.

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5.0 DISCUSSION OF RESULTS AND CONCLUSIONS

5.1 TPH FULL CARBON CHAIN (EPA METHOD 8015M)

- TPH compounds were detected at very low levels in a majority of the samples analyzed.
- The highest TPH concentration for the sum of hydrocarbon compounds with carbon chain lengths of 7 to 44 (C7-C44) was 550 mg/kg in a 0.5-ft soil sample (most TPH compounds were detected in the C30+ range).
- None of the analytical results for shallow soil samples was high enough to justify the testing of deeper soil samples.
- None of the analytical results for TPH indicate 1) any significant release of hydrocarbon based materials, or 2) levels which would cause the impacted soil to require removal from the Site based upon applicable rules and regulations.

5.2 SVOCS (EPA METHOD 8270C)

- SVOCs were not detected in a majority of soil samples analyzed. A few samples contained low levels of PAHs and phthalates (di-n-octyl phthalate and BEP).
- None of the analytical results for shallow soil samples was high enough to justify the testing of deeper soil samples.
- None of the analytical results indicate any significant release of SVOCs.
- None of these samples contained measurable concentrations of SVOCs (PAHs or phthalates) that 1) were above their respective PRGs for industrial soil, or 2) would cause the soil to be classified as a hazardous waste based upon applicable rules and regulations.

5.3 VOCS (EPA METHODS 5035/8260B)

- VOCs (acetone, benzene, and toluene) at concentrations below or near the analytical reporting limits were detected in most 5-ft depth soil samples. Analytical method blanks did not detect these VOCs
- Tetrachloroethene was detected at concentrations of approximately 1.2 to 5.4 ug/kg in a few soil samples.
- None of the analytical results indicate any significant release of VOCs.
- All VOC concentrations were well below the respective PRG for industrial soil and would not be classified as a hazardous waste based upon applicable rules and regulations.

5.4 TOTAL METALS (CCR TITLE 22 METALS)

Metals at various concentrations were detected in all soil samples. Elevated levels of total lead and arsenic were reported in a number of samples from the site. A few samples contained elevated levels of barium, copper, and/or zinc. Results and conclusions associated with lead, arsenic, barium, copper, and zinc are presented below.

5.4.1 Lead

- Only one soil sample (NHA7-0.5') from the North Parcel had a concentration of total lead (4,700 mg/kg) above the TTLC of 1,000 mg/l and the PRG for industrial soil of 750 mg/kg. Re-analysis of the soil sample for lead showed a total lead concentration of 98.6 mg/kg, which indicated a metal

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flake or artifact was likely present in the first sample. The result of the WET procedure for soluble lead on the sample that contained 4,700 mg/kg of total lead was 5.33 mg/l, which is marginally above the STLC of 5 mg/l concentration. When the same sample was subjected to the TCLP, the soluble lead concentration detected (0.164 mg/l) was below the TCLP limit of 5 mg/l.

- At five locations (including NHA7-0.5' discussed above) in the North Parcel and twelve locations in the South parcel, the total lead concentrations exceeded 10x the STLC of 5 mg/l. The soil samples that exceeded 10x the STLC for lead were subjected to the WET procedure for soluble lead. At two locations in the North Parcel and ten locations in the South Parcel the soluble lead exceeded 5 mg/l based upon the WET procedure. Most of the soluble lead concentrations were marginally above the 5 mg/l concentration except that one location in North Parcel showed a soluble lead value of 59.5 mg/l and two locations in the South parcel showed concentrations of 35.6 mg/l and 25.2 mg/l.
- At two locations in the North Parcel and seven locations in the South parcel, the total lead concentrations exceeded 20x the TCLP concentration of 5 mg/l. None of the soil samples that were subjected to the TCLP exceeded the 5 mg/l concentration for soluble lead.

Considering that the elevated lead concentrations are distributed over a relatively wide area of both parcels, the presence of lead may be due to urban background contributions, rather than a direct chemical release from a historic operation and/or waste management feature. The total lead findings for this investigation are consistent with those previously reported by HartCrowser (1994). Further, the concentrations of lead found at the Site in this investigation are generally consistent with the urban and regional background values quoted by HartCrowser (1994 and 1995). Tables and figures from HartCrowser's report are included in Appendix D.

It is reasonable to conclude in general that the lead concentrations at the Site do not exceed the PRG for industrial soil. However, soluble lead concentrations exceeding the STLC of 5 mg/l as measured by the WET procedure may be classified as a California hazardous waste (if the soil were to be excavated) for purposes of transportation and disposal.

5.4.2 Arsenic

- Arsenic was detected above the detection limit of 0.75 mg/kg in the majority of samples. One sample (SHA6-0.5') had a total arsenic concentration of 50.5 mg/kg, which slightly exceeded 10x the STLC of 5 mg/l for arsenic. When this sample was subjected to the WET procedure for the determination of soluble arsenic, the soluble arsenic concentration was 1.9 mg/l.
- A number of soil samples contained total arsenic at levels exceeding the PRG of 1.6 mg/kg for industrial soil.

Considering that the elevated arsenic concentrations are distributed over a relatively wide area of both parcels, the presence of arsenic (much like lead) may be due to urban background contributions, rather than a direct chemical release from a historical operation and/or waste management feature. As was the case with total lead, the total arsenic findings for this investigation are consistent with those previously reported by HartCrowser (1994 and 1995). Further, the concentrations of arsenic found at the Site in this investigation are generally consistent with the regional background value of 8.3 mg/kg quoted by HartCrowser (1995).

None of the total or soluble arsenic concentrations detected would cause the soil to be classified as a California or USEPA hazardous waste (if the soil were to be excavated) for purposes of transportation and disposal. Exceedances of arsenic concentrations above the PRG for industrial soil may require that the soil be further evaluated for potential environmental concerns. However, it should also be noted that EPA

Region 9 (author of the PRGs) recognizes that some PRG levels have been set at or below typical background concentrations. An example of this is naturally occurring arsenic in soils that frequently exceed the PRG that EPA Region 9 has established for arsenic. EPA has at times used the non-cancer PRG of 22 mg/kg to evaluate sites, recognizing that this value tends to be above background levels yet still falls within the range of soil concentration (0.39-39 mg/kg) that equates to EPA's acceptable cancer risk range.

5.4.3 Barium, Copper, and Zinc

- One sample (NHA10-0.5') in the North Parcel contained total barium and zinc concentrations of 11,300 and 23,700 mg/kg, respectively, which exceeded their respective TTLCs of 10,000 and 5,000 mg/kg. Re-analysis of this sample showed lower total barium and zinc concentrations of 2,880 and 2,490 mg/kg, respectively. Analysis of the 3-ft sample at this location showed total concentrations of barium and zinc at 143.0 and 58.8 mg/kg, respectively.
- The NHA10-0.5' soil sample was subjected to the WET procedure for soluble barium and zinc. The result of the WET procedure for soluble barium and zinc on NHA10-0.5' was 23.4 mg/l and 309.0 mg/l, respectively. Further, since the total barium concentration in NHA10-0.5' exceeded 20x the TCLP concentration of 100 mg/l, the sample was subjected to the TCLP. The resulting soluble barium concentration was 1.7 mg/l, which is below the TCLP of 100 mg/l.
- One soil sample (NHA7-0.5') in the North Parcel contained a total copper concentration of 474.0 mg/kg, which exceeded 10x the STLC of 25 mg/l. This soil samples was subjected to the WET procedure for soluble copper. The soluble copper concentration was 3.13 mg/l, which is below the STLC value for this compound.

It is reasonable to conclude in general that the barium, copper, and zinc concentrations at the Site do not exceed their respective PRG for industrial soil. However, total barium, soluble barium, and total zinc concentrations in sample NHA10-0.5 may be classified as a California hazardous waste (if the soil were to be excavated) for purposes of transportation and disposal.

5.5 Hexavalent Chromium (EPA Method 7199 with Alkaline Digestion)

- Hexavalent chromium was detected at very low levels over a wide area of the Site. All detections were reported as qualifiable but not quantifiable (concentrations detected were below the reporting limit but above the method detection limit) by the laboratory.
- The concentrations of hexavalent chromium reported were well below the PRG for industrial soil.

5.6 Organochlorine Pesticides (EPA Method 8081A)

- Organochlorine Pesticides were detected at very low levels in a few samples from the Site.
- The concentrations of the organochlorine pesticides reported were well below the respective PRGs for industrial soil and would not be classified as a hazardous waste based upon applicable rules and regulations.

5.7 PCBs (EPA Method 8082)

- PCBs were detected at very low levels in a few samples from the Site.
- The concentrations of the PCBs reported were well below the PRGs for industrial soil and would not be classified as a hazardous waste based upon applicable rules and regulations.

5.8 HERBICIDES (EPA METHOD 8151)

- Herbicides were not detected in any of the samples analyzed.

5.9 INVESTIGATION STATUS AT POTENTIAL AREAS OF CONCERN

The following table identifies the potential areas of concern and the status of investigation activities at each area. Inaccessible areas of the Site were fenced-off and secured by locked gates. Because these target areas could not be investigated, assessment should be conducted in the future when access is available.

Area of Potential Concern	Investigated
Area 1 – Surface Soil Discoloration	Yes
Area 2 – Surface Soil Discoloration	Yes
Area 3 – Clarifier	Yes
Area 4 - Clarifier	Yes
Area 5 – Concrete Lined Pit	Yes
Bryant Die Casting (Former Die Casting Area), 1763 East 41st Street	Yes
Universal Truck Body, Inc. (former truck repair area), 1845 East 41st Street	Yes
Metal Products Engineering, 4000 East Long Beach Avenue	No – Area not accessible.
Former Painting Area, 1808 East 40th Place	Yes
Former Varnish Room Area, 1814 East 40th Place	Yes
Former Plywood Gluing and Drying Area, 1786 East Martin Luther King Jr. Boulevard	Yes
Former Cabinet Finishing & Painting Area, 1840 East Martin Luther King Jr. Boulevard	Yes
Adjacent Oil Pipelines located along Long Beach Avenue	No – Area not accessible.
Grided Sample Locations	Yes
Carpet Cleaning - between 4014 and 4022 East Long Beach Avenue	No – Area not accessible.
Oil Storage - between 1750 and 1770 East Martin Luther King, Jr. Boulevard (formerly East Santa Barbara Avenue)	No – Area not accessible.
Metal Cast & Pattern Shop – 1707 and 1709 East 41st Street	No – Area not accessible.
Foundry – 1715 East 41st Street	No – Area not accessible.
Gas and Oil – 4050 East Long Beach Avenue	No – Area not accessible.

5.10 GENERAL SOIL LITHOLOGY

Twenty-nine (29) of the borings were terminated at approximately 5 feet bgs. Approximately fifteen of the borings were terminated at 10 feet bgs and nine (9) of the borings were terminated at approximately 15 feet bgs. The predominant soil lithology observed in the upper 5 feet of the borings was silty fine sands and sandy fine silts. Organic matter was noted in some of the 0.5-ft bgs samples and is likely due to

the addition of this material by the tenant gardeners. The predominant soil type at the 10 ft depth was sand with a few of the borings containing silts and clays at this depth. The samples from the 15 ft depths was primarily sand. Saturated soil conditions were not encountered in any of these shallow soil borings.

Soil boring logs are included in Appendix E. A soil boring log was generated for each borings in excess of 5 feet bgs. Representative boring logs were generated for groups of borings with a maximum depth of 5 ft bgs.

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6.0 LIMITATIONS

This document is prepared for the sole use and benefit of the Port of Los Angeles. Neither this report, nor any information contained herein, shall be used or relied upon by any person other than the Port of Los Angeles. The responsibility for making any disclosures or reports to any third party and for taking a corrective, remedial, or mitigative action shall be solely that of the Port of Los Angeles.

Our judgments and conclusions in this report are based upon the analytical data and information acquired during this investigation and our experiences on similar projects. It is possible that variations in surface and subsurface conditions exist beyond the points explored in this limited soil investigation. Further, changes in subsurface conditions found could occur at some time in the future due to variations in rainfall, temperature, land use (both on-site and off-site), or other factors. These changes can affect the behavior of materials and contaminants in soil and groundwater.

The data obtained from the collected samples does not preclude the presence of other chemical materials at the site that may or may not be considered chemical of concern. Further, changes in applicable regulatory standards periodically occur as a result of legislative actions and/or studies. This may result in the findings of this report being invalidated, wholly or in part, by changes beyond our control.

Opinions and judgments expressed within this report are based upon our understanding and interpretation of current regulatory standards and should not be used as legal opinions. The services provided for this project have been performed in accordance with the Scope of Work and the contract between Pacific Edge Engineering, Inc. and the Port of Los Angeles. The services performed have been conducted in a manner consistent with the level of care and skill ordinarily exercised by members of our profession currently practicing under similar conditions in Southern California. Pacific Edge Engineering, Inc. or Jenkins Environmental Associates makes no warranty, expressed or implied.

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PACIFIC EDGE ENGINEERING

(949) 470-1937; (949) 470-0943 (FAX)

Table 1
Potential Areas of Chemical Concern
LANCER Site

Area/Item/Issue	Comments
Area 1 – Surface Soil – TPH	➢ Chemical test 418.1 (>10,000 ppm) and 8240 ("minor" hits). Area excavated (47 yd^3) and disposed offsite. ➢ Confirmation samples 418.1 only (ND) – no 8240. ➢ Bottom samples only – no sidewall samples. ➢ "It appears lateral limits of the contamination areas were based upon visual inspection rather than actual sampling", Montgomery Watson (MW), April 1993.
Area 2 – Surface soil – black, ashy color	➢ Chemical test 418.1 (1-ft 297 to 31,400 ppm; 2 ft. 100 ppm to ND) and 8270 (bis (2-ethylhexyl) phthalate, pyrene, chrysene, benzo(a)pyrene – need to confirm). ➢ Area excavated (177 yd^3) and disposed offsite. ➢ Confirmation samples analyzed for 418.1 (<10 ppm) and 8270 (ND). ➢ Bottom samples only – no sidewall samples. ➢ "It appears lateral limits of the contamination areas were based upon visual inspection rather than actual sampling" (MW, April 1993).
Area 3 – Clarifier	➢ Contents of clarifier were hazardous. ➢ Confirmation sampling at "Clarifier 1" indicates 10 ppm TPH and below detection limit of 5 ppb for benzene, toluene, xylene, and ethylbenzene (BTEX) (EPA method 8020).
Area 4 – Clarifier	➢ Contents of clarifier were hazardous. ➢ "Laboratory analyses indicated significant BTEX levels in areas of the Concrete Clarifier #2. The TTLC limit was also exceeded for lead. This could be an indication of undocumented release of leaded gasoline. Confirmation testing following the excavation and removal are incomplete" (MW, April 1993) ➢ "Soil underlying the former Concrete Clarifier 2 tested below the detection limit of all contaminants (EPA 8240)."
Area 5 – Concrete Lined Pit	➢ Chemical tests of contents 418.1 (15,400 ppm) and 8270 (34,000 ppb of bis (2-ethylhexyl) phthalate plus minor concentrations of pyrene, chrysene, benzo(a)pyrene. ➢ Concrete pit was pulled from the ground, inspected for leaks, and removed from the site. ➢ Status of confirmation samples is uncertain.

Table 1
Potential Areas of Chemical Concern
LANCER Site

Area/Item/Issue	Comments
Bryant Die Cast (Former Die Casting Area) 1763 East 41st Street	➢ Government Database Listing (VISTA) as stated in MW Phase I – type unknown ➢ The current site for this business is listed on a government database – No further action (MW - April 1993). ➢ Site was listed in the MW's 1993 Preliminary Site Assessment (Table 5-1) as an area "with potential contamination risk." (metals).
Universal Truck Body Inc. (Former Truck Repair Area) 1845 East 41st Street 1828 East 41st Street Suspected UST ("gas pump") at former truck repair site	➢ Government Database Listing (VISTA) as stated in MW Phase I – type unknown ➢ Citation in file for "gas pump" from LAFD. Geophysical survey of this area was unsuccessful in identifying the location of the potential UST. ➢ The current site for this business is listed on a government database – No further action. (MW - April 1993). ➢ Site was listed in the MW's 1993 Preliminary Site Assessment (Table 5-1) as an area "with potential contamination risk." (solvents, paints, thinners)
Metal Products Engineering (Metal Products Engineering) 4000 Long Beach Ave.	➢ Government Database Listing (VISTA) as stated in MW Phase I – type unknown ➢ The current site for this business is listed on a government database – CASITES. (MW - April 1993).
Former Painting Area 1808 East 40th Street	➢ Site was listed in the MW's 1993 Preliminary Site Assessment (Table 5-1) as an area "with potential contamination risk." (solvents, paints, thinners)
Former Varnish Room Area 1814 East 40th Place	➢ Site was listed in the MW's 1993 Preliminary Site Assessment (Table 5-1) as an area "with potential contamination risk." (solvents, paints, thinners)
Former Machine Shop Area 1715 East 41st Street	➢ Site was listed in the MW's 1993 Preliminary Site Assessment (Table 5-1) as an area "with potential contamination risk." (metals, cutting oils, solvents)
Former Plywood Gluing and Drying Area 1786 MLK Jr. Blvd.	➢ Site was listed in the MW's 1993 Preliminary Site Assessment (Table 5-1) as an area "with potential contamination risk." (solvents)
Former Cabinet Finishing & Painting Area 1840 MLK Jr. Blvd	➢ Site was listed in the MW's 1993 Preliminary Site Assessment (Table 5-1) as an area "with potential contamination risk." (solvents, paint, thinner)

Table 1
Potential Areas of Chemical Concern
LANCER Site

Area/Item/Issue	Comments	
Elevated Lead and PAH levels (North 6.5 Acre, South 6.5 Acre, and 1 Acre locations)	➢ Identified as part of grid samples performed by HC in 1994.	
Adjacent oil pipeline located along West Long Beach Boulevard	➢ No sampling appears to have addressed this issue. ➢ Site was listed in the MW's 1993 Preliminary Site Assessment (Table 5-1) as an area "with potential contamination risk." (offsite oil)	➢ 3 borings to 30 feet ➢ Analyze 10, 20, and 30-ft. sample in each for TPH. ➢ Archive remaining samples for possible future analysis.
Former UST 1786 MLK	➢ UST was pulled by Hart Crowser, Inc. in June 1996.	➢ No further sampling at this location at this time.
Groundwater	Depth could be as shallow as 85 feet below ground surface (bgs) but more likely 205 feet bgs based on a nearby site.	➢ No further action at this time. Further characterization of site soil is required to determine if there is a potential impact to groundwater from an onsite source.

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Table 2
Summary of Soil Sampling and Analyses
LANCER Site

Item/Issue	Boring ID[1]	Sample Depth (ft) and Analytical Procedures[2]	
Area 1 – Surface Soil – TPH	A1HA1	0.5	Archive
	A1HA2	3	Archive
	A1HA3	5	TPH and VOCs
Area 2 – Surface soil – black, ashy color	A2HA1	0.5	Archive
	A2HA2	3	Archive
	A2HA3	5	TPH, VOCs, and SVOCs
Area 3 – Clarifier	A3GP1	0.5	Archive
	A3GP2	3	Archive
	A3GP3	5	Archive
		10	Archive
		15	TPH, VOCs, SVOCs, and total metals
Area 4 – Clarifier	A4GP1	0.5	Archive
	A4GP2	3	Archive
	A4GP3	5	Archive
		10	Archive
		15	TPH, VOCs, and total metals
Area 5 – Concrete Lined Pit	A5GP1	0.5	Archive
	A5GP2	3	Archive
	A5GP3	5	Archive
		10	Archive
		15	TPH, VOCs, and SVOCs
Bryant Die Cast (Former Die Casting Area) 1763 East 41st Street	SHA11	0.5	Total metals and hexavalent chromium
	SHA12	3	Archive
	SHA13	5	TPH and VOCs
Universal Truck Body Inc. (Former Truck Repair Area) 1845 East 41st Street 1828 East 41st Street	A1HA1	0.5	Archive A1HA1, 2, and 3. TPH, SVOCs, total metals, hexavalent chromium, pesticides, PCBs, and herbicides for SHA1
	A1HA2		
	A1HA3		
	SHA1		
		3	Archive
Suspected UST ("gas pump") at former truck repair site		5	TPH and VOCs
Metal Products Engineering (Metal Products Engineering) 4000 Long Beach Ave.	PENDING – AREA NOT ACESSIBLE		
Former Painting Area 1808 East 40th Street	SGP4	0.5	Total metals and hexavalent chromium
	SGP5	3	Archive
	SGP6	5	Archive
		10	TPH and VOCs
Former Varnish Room Area 1814 East 40th Place	SGP1	0.5	Total metals and hexavalent chromium
	SGP2	3	Archive
	SGP3	5	Archive
		10	TPH and VOCs

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Table 2
Summary of Soil Sampling and Analyses
LANCER Site

Item/Issue	Boring ID[1]	Sample Depth (ft) and Analytical Procedures[2]	
Former Machine Shop Area 1715 East 41st Street	SGP7 SGP8 SGP9	0.5 3 5 10	Total metals and hexavalent chromium Archive Archive TPH and VOCs
Former Plywood Gluing and Drying Area 1786 MLK Jr. Blvd.	NGP1 NGP2 NGP3	0.5 3 5 10	Archive Archive Archive TPH and VOCs
Former Cabinet Finishing & Painting Area 1840 MLK Jr. Blvd	NGP4 NGP5 NGP6	0.5 3 5 10	Total metals and hexavalent chromium Archive Archive TPH and VOCs
Elevated Lead and PAH levels (North 6.5 Acre, South 6.5 Acre, and 1 Acre locations)	NHA1 through 10 SHA1 through 10	0.5 3 5	TPH, SVOCs, total metals, hexavalent chromium, pesticides, PCBs, and herbicides Archive VOCs
Adjacent oil pipeline located along West Long Beach Boulevard	PENDING – AREA NOT ACESSIBLE		

[1]Boring ID: A1, A2, A3, A4, A5 = Area 1 through Area 5
SHA = Hand auger location on southern half of Site
NHA = Hand auger location on northern half of Site
GP – GeoProbe® location
at end = boring number

[2]Analyses: Total Petroleum Hydrocarbons (TPH) Full Carbon Chain by EPA Method 8015M
Semivolatile Organic Compounds (SVOCs) by EPA Method 8270C
Volatile Organic Compounds (VOCs) by EPA Methods 5035/8260B
Total Metals by CCR Title 22 Metals
Hexavalent Chromium by EPA Method 7199 with alkaline digestion
Organochlorine Pesticides & PCBs EPA Method 8081A/8082
Herbicides (EPA Method 8151)

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Table 3 - 8015M TPH Full Carbon Chain Soil Quality Summary (mg/kg)

Sample ID	Date Sampled	C7	C8	C9-C10	C11-C12	C13-C14	C15-C16	C17-C18	C19-C20	C21-C22	C23-C24	C25-C28	C29-C32	C33-C36	C37-C40	C41-C44	Total
SHA5-0.5'	08-28-03	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	< 5.0
SHA6-0.5'	08-28-03	ND	ND	ND	ND	ND	ND	ND	ND	**1.8**	**5.5**	**34.0**	**83.0**	**67.0**	**81.0**	**61.0**	**330.0**
SHA7-0.5'	08-28-03	ND	ND	ND	ND	ND	ND	ND	ND	ND	**2.1**	**13.0**	**49.0**	**44.0**	**50.0**	**58.0**	**220.0**
SHA8-0.5'	08-28-03	ND	ND	ND	ND	ND	ND	ND	ND	ND	**2.4**	**17.0**	**42.0**	**48.0**	**41.0**	**56.0**	**210.0**
SHA9-0.5'	08-28-03	ND	ND	ND	ND	ND	ND	**0.29**	**1.9**	**3.6**	**11.0**	**46.0**	**100.0**	**110.0**	**95.0**	**87.0**	**450.0**
SHA10-0.5'	08-28-03	**1.1**	ND	**0.21**	ND	ND	ND	ND	**0.21**	**1.1**	**2.5**	**13.0**	**23.0**	**22.0**	**19.0**	**15.0**	**97.0**

NOTES

ND = Non-detect. Reporting Limits are undefined for specific hydrocarbon ranges.
Bold values represent compounds detected above laboratory reporting limit.

Table 3 - 8015M TPH Full Carbon Chain Soil Quality Summary (mg/kg)

Sample ID	Date Sampled	C7	C8	C9-C10	C11-C12	C13-C14	C15-C16	C17-C18	C19-C20	C21-C22	C23-C24	C25-C28	C29-C32	C33-C36	C37-C40	C41-C44	Total
Former Varnish Room Area																	
SGP1-10'	09-02-03	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	< 5.0
SGP2-10'	09-02-03	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	< 5.0
SGP3-10'	09-02-03	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	< 5.0
Random																	
NHA1-0.5'	08-28-03	ND	ND	ND	ND	ND	ND	ND	ND	0.4	1.9	8.7	19.0	21.0	21.0	21.0	94.0
NHA2-0.5'	08-28-03	ND	ND	ND	ND	ND	ND	ND	0.22	2.6	6.3	21.0	36.0	37.0	28.0	31.0	160.0
NHA3-0.5'	08-28-03	ND	ND	ND	ND	ND	ND	ND	ND	ND	1.6	8.1	21.0	29.0	27.0	30.0	120.0
NHA4-0.5'	08-28-03	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	0.58	2.1	2.0	1.7	1.9	8.2
NHA5-0.5'	08-28-03	ND	ND	ND	ND	ND	ND	ND	ND	ND	8.1	32.0	94.0	120.0	140.0	120.0	520.0
NHA6-0.5'	08-28-03	ND	ND	ND	ND	ND	ND	ND	ND	ND	1.0	3.8	12.0	19.0	18.0	18.0	73.0
NHA7-0.5'	08-28-03	ND	ND	ND	ND	ND	ND	ND	ND	ND	10.0	51.0	100.0	100.0	120.0	120.0	500.0
NHA8-0.5'	08-28-03	ND	ND	ND	ND	ND	0.84	3.3	5.5	7.5	11.0	24.0	29.0	29.0	26.0	19.0	150.0
NHA9-0.5'	08-28-03	ND	ND	ND	ND	ND	0.44	1.1	2.4	4.1	9.8	24.0	46.0	56.0	38.0	29.0	210.0
NHA10-0.5'	08-28-03	ND	ND	ND	ND	ND	ND	ND	1.2	3.5	15.0	27.0	50.0	48.0	46.0	49.0	240.0
SHA1-0.5'	08-28-03	ND	ND	ND	ND	ND	ND	ND	ND	1.5	4.9	21.0	37.0	41.0	25.0	24.0	150.0
SHA2-0.5'	08-28-03	ND	ND	ND	ND	ND	ND	ND	ND	ND	0.15	1.3	3.7	1.9	1.6	1.8	10.0
SHA3-0.5'	08-28-03	ND	ND	ND	ND	ND	ND	ND	ND	ND	7.7	38.0	120.0	120.0	140.0	120.0	550.0
SHA4-0.5'	08-28-03	ND	ND	ND	ND	ND	ND	ND	ND	ND	1.1	7.4	29.0	22.0	23.0	29.0	110.0

Table 3 - 8015M TPH Full Carbon Chain Soil Quality Summary (mg/kg)

Sample ID	Date Sampled	C7	C8	C9-C10	C11-C12	C13-C14	C15-C16	C17-C18	C19-C20	C21-C22	C23-C24	C25-C28	C29-C32	C33-C36	C37-C40	C41-C44	Total
Bryant Die Cast																	
SHA11-5'	09-09-03	ND	ND	ND	ND	ND	ND	0.19	ND	ND	0.9	0.23	ND	ND	ND	ND	< 5.0
SHA12-5'	09-09-03	ND	ND	ND	ND	ND	ND	ND	ND	ND	0.31	0.05	ND	ND	ND	ND	< 5.0
SHA13-5'	09-09-03	ND	ND	ND	ND	ND	ND	ND	ND	ND	0.31	0.13	ND	ND	ND	ND	< 5.0
Former Cabinet Finishing/Painting Area																	
NGP4-10'	09-04-03	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	< 5.0
NGP5-10'	09-04-03	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	< 5.0
NGP6-10'	09-04-03	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	< 5.0
Former Machine Shop Area																	
SGP7-10'	09-09-03	ND	ND	ND	ND	ND	ND	0.28	ND	ND	1.7	0.25	ND	ND	ND	ND	< 5.0
SGP8-10'	09-09-03	ND	ND	ND	ND	ND	ND	0.33	ND	ND	3.8	0.46	ND	ND	ND	ND	< 5.0
SGP9-10'	09-09-03	ND	ND	ND	ND	ND	ND	ND	ND	ND	2.4	ND	ND	ND	ND	ND	< 5.0
Former Painting Area																	
SGP4-10'	09-02-03	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	< 5.0
SGP5-10'	09-02-03	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	< 5.0
SGP6-10'	09-02-03	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	< 5.0
Former Plywood Gluing/Drying Area																	
NGP1-10'	09-04-03	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	< 5.0
NGP2-10'	09-04-03	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	< 5.0
NGP3-10'	09-04-03	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	< 5.0

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Table 3 - 8015M TPH Full Carbon Chain Soil Quality Summary (mg/kg)

Sample ID	Date Sampled	C7	C8	C9-C10	C11-C12	C13-C14	C15-C16	C17-C18	C19-C20	C21-C22	C23-C24	C25-C28	C29-C32	C33-C36	C37-C40	C41-C44	Total
Area 1																	
A1HA1-5'	09-09-03	ND	ND	ND	ND	ND	ND	ND	ND	0.26	0.43	0.16	ND	6.1	ND	ND	6.9
A1HA2-5'	09-09-03	ND	ND	ND	0.55	ND	ND	0.24	ND	ND	0.51	0.19	0.21	ND	ND	ND	< 5.0
A1HA3-5'	09-09-03	ND	ND	ND	ND	ND	ND	0.18	ND	ND	0.35	0.54	ND	ND	ND	ND	< 5.0
Area 2																	
A2HA1-5'	09-09-03	ND	ND	ND	ND	ND	ND	0.24	ND	ND	1.3	0.31	ND	ND	ND	ND	< 5.0
A2HA2-5'	09-09-03	ND	ND	ND	ND	ND	ND	0.12	ND	ND	0.48	0.3	ND	ND	ND	ND	< 5.0
A2HA3-5'	09-09-03	ND	ND	ND	ND	ND	ND	0.1	ND	ND	0.29	0.24	ND	ND	ND	ND	< 5.0
Area 3																	
A3GP1-15'	09-04-03	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	< 5.0
A3GP2-15'	09-02-03	ND	ND	ND	ND	ND	ND	0.65	ND	ND	ND	ND	ND	ND	ND	ND	< 5.0
A3GP3-15'	09-02-03	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	< 5.0
Area 4																	
A4GP2-15'	09-02-03	ND	ND	ND	ND	ND	ND	1.4	0.29	0.05	ND	ND	ND	ND	ND	ND	< 5.0
A4GP3-15'	09-02-03	ND	ND	ND	ND	ND	ND	0.64	0.13	ND	ND	ND	ND	ND	ND	ND	< 5.0
A4GP1-15'	09-02-03	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	< 5.0
Area 5																	
A5GP1-15'	09-04-03	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	< 5.0
A5GP2-15'	09-04-03	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	< 5.0
A5GP3-15'	09-04-03	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	6.8	6.8

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Table 4a - 8270C (Detected Analytes Only)
Soil Quality Summary (ug/kg)
LANCER Site, Los Angeles, California

RSLs - commercial

Sample ID	Benzo (a) Anthracene	Benzo (a) Pyrene	Benzo (b) Fluoranthene	Benzo (g,h,i) Perylene	Benzo (k) Fluoranthene	Bis(2-Ethylhexyl) Phthalate	Chrysene	Di-n-Butyl Phthalate	Fluoranthene	Indeno (1,2,3-c,d) Pyrene	Naphthalene	Phenanthrene	Pyrene
IND. PRG:	2,100	210	2,100	NA	1,300	120,000	210,000	NA	$2.2X10^7$	2,100	190,000	NA	$2.9X10^7$
Area 2	2,100 ug/kg	210	2,100		21,000	120,000	210,000	6.2E+07	2.2E+07	2,100	18,000		1.7E+07
A2HA1-5'	< 0.2	< 0.18	< 0.2	< 0.2	< 0.2	< 0.25	< 0.2	< 0.25	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2
A2HA2-5'	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.25	< 0.1	< 0.25	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1
A2HA3-5'	< 0.2	< 0.18	< 0.2	< 0.2	< 0.2	< 0.25	< 0.2	< 0.25	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2
Area 5													
A5GP1-15'	< 0.2	< 0.18	< 0.2	< 0.2	< 0.2	< 0.25	< 0.2	< 0.25	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2
A5GP2-15'	< 0.2	< 0.18	< 0.2	< 0.2	< 0.2	< 0.25	< 0.2	< 0.25	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2
A5GP3-15'	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.25	< 0.1	< 0.25	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1
Random													
NHA1-0.5'	< 0.2	< 0.18	< 0.2	< 0.2	< 0.2	< 0.25	< 0.2	< 0.25	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2
NHA2-0.5'	< 0.2	< 0.18	< 0.2	< 0.2	< 0.2	< 0.25	< 0.2	< 0.25	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2
NHA3-0.5'	< 0.2	< 0.18	< 0.2	< 0.2	< 0.2	0.17 J	< 0.2	< 0.25	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2
NHA4-0.5'	< 0.2	< 0.18	< 0.2	< 0.2	< 0.2	< 0.25	< 0.2	< 0.25	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2
NHA5-0.5'	< 0.2	< 0.18	< 0.2	< 0.2	< 0.2	**0.31**	< 0.2	< 0.25	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2
NHA6-0.5'	< 0.2	< 0.18	< 0.2	< 0.2	< 0.2	0.18 J	< 0.2	< 0.25	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2
NHA7-0.5'	**0.21**	**0.19**	0.18 J	**0.29**	**0.21**	**0.28**	**0.25**	**0.68**	0.17 J	0.18 J	< 0.2	0.19 J	**0.73**
NHA8-0.5'	< 0.2	< 0.18	< 0.2	< 0.2	< 0.2	< 0.25	< 0.2	< 0.25	< 0.2	< 0.2	**0.21**	< 0.2	< 0.2
NHA9-0.5'	< 0.2	< 0.18	< 0.2	< 0.2	< 0.2	0.16 J	< 0.2	< 0.25	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2
NHA10-0.5'	< 0.2	< 0.18	< 0.2	0.11 J	< 0.2	**0.48**	< 0.2	**2.7**	< 0.2	< 0.2	< 0.2	< 0.2	**0.2**
SHA1-0.5'	< 0.2	< 0.18	< 0.2	< 0.2	< 0.2	**1.7**	< 0.2	< 0.25	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2
SHA2-0.5'	0.17 J	**0.22**	**0.27**	**0.24**	**0.31**	**0.64**	**0.24**	< 0.25	**0.27**	**0.2**	< 0.2	0.12 J	**0.56**
SHA3-0.5'	< 0.2	< 0.18	< 0.2	0.12 J	< 0.2	0.21 J	< 0.2	< 0.25	< 0.2	< 0.2	< 0.2	< 0.2	**0.24**
SHA4-0.5'	< 0.2	< 0.18	< 0.2	< 0.2	< 0.2	0.21 J	< 0.2	< 0.25	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2
SHA5-0.5'	< 0.2	< 0.18	< 0.2	< 0.2	< 0.2	< 0.25	< 0.2	< 0.25	< 0.2	< 0.2	0.13 J	< 0.2	< 0.2
SHA6-0.5'	0.1 J	0.14 J	0.1 J	0.13 J	0.14 J	**0.48**	0.14 J	**0.32**	0.15 J	< 0.2	< 0.2	0.13 J	**0.46**
SHA7-0.5'	< 0.2	< 0.18	< 0.2	< 0.2	< 0.2	**0.54**	< 0.2	< 0.25	< 0.2	< 0.2	< 0.2	< 0.2	0.12 J
SHA8-0.5'	< 0.2	< 0.18	< 0.2	< 0.2	< 0.2	**0.52**	< 0.2	< 0.25	< 0.2	< 0.2	< 0.2	< 0.2	0.13 J
SHA9-0.5'	< 0.2	< 0.18	< 0.2	< 0.2	< 0.2	**2.7**	< 0.2	0.12 J	< 0.2	< 0.2	< 0.2	< 0.2	0.13 J
SHA10-0.5'	< 0.2	< 0.18	< 0.2	< 0.2	< 0.2	**0.33**	< 0.2	< 0.25	< 0.2	< 0.2	< 0.2	< 0.2	0.14 J

NOTES *J = Analyte was detected at a concentration below the reporting limit. Reported value is estimated.*
Bold values represent compounds detected above laboratory reporting limit.
IND. PRG = Industrial Soil Preliminary Remedial Goals, EPA Region 9, 2002. PRGs for Benzo (k) fluoranthne, Chrysene are "CAL-Modified PRG" values.

Table 4b - 8270C Soil Quality Summary (ug/kg)
LANCER Site, Los Angeles, California

	Area 2			*Area 5*			*Random*						
Parameter	*A2HA1-5'*	*A2HA2-5'*	*A2HA3-5'*	*A5GP1-15'*	*A5GP2-15'*	*A5GP3-15'*	*NHA1-0.5'*	*NHA2-0.5'*	*NHA3-0.5'*	*NHA4-0.5'*	*NHA5-0.5'*	*NHA6-0.5'*	*NHA7-0.5'*
1,2,4-Trichlorobenzene_8270	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25
1,2-Dichlorobenzene_8270	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25
1,3-Dichlorobenzene_8270	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25
1,4-Dichlorobenzene_8270	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25
1-Methylnaphthalene	< 0.2	< 0.1	< 0.2	< 0.2	< 0.2	< 0.1	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2
2,4,5-Trichlorophenol	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25
2,4,6-Trichlorophenol	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25
2,4-Dichlorophenol	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25
2,4-Dimethylphenol	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25
2,4-Dinitrophenol	< 1.3	< 1.3	< 1.3	< 1.3	< 1.3	< 1.3	< 1.3	< 1.3	< 1.3	< 1.3	< 1.3	< 1.3	< 1.3
2,4-Dinitrotoluene	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25
2,6-Dinitrotoluene	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25
2-Chloronaphthalene	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25
2-Chlorophenol	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25
2-Methylnaphthalene	< 0.2	< 0.1	< 0.2	< 0.2	< 0.2	< 0.1	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2
2-Methylphenol	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25
2-Nitroaniline	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25
2-Nitrophenol	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25
3,3'-Dichlorobenzidine	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25
3/4-Methylphenol	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25
3-Nitroaniline	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25
4,6-Dinitro-2-Methylphenol	< 1.3	< 1.3	< 1.3	< 1.3	< 1.3	< 1.3	< 1.3	< 1.3	< 1.3	< 1.3	< 1.3	< 1.3	< 1.3
4-Bromophenyl-Phenyl Ether	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25
4-Chloro-3-Methylphenol	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25
4-Chloroaniline	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25
4-Chlorophenyl-Phenyl Ether	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25
4-Nitroaniline	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25
4-Nitrophenol	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25
Acenaphthene	< 0.2	< 0.1	< 0.2	< 0.2	< 0.2	< 0.1	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2
Acenaphthylene	< 0.2	< 0.1	< 0.2	< 0.2	< 0.2	< 0.1	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2
Aniline	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25
Anthracene	< 0.2	< 0.1	< 0.2	< 0.2	< 0.2	< 0.1	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2
Azobenzene	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25
Benzidine	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0
Benzo (a) Anthracene	< 0.2	< 0.1	< 0.2	< 0.2	< 0.2	< 0.1	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	**0.21**
Benzo (a) Pyrene	< 0.18	< 0.1	< 0.18	< 0.18	< 0.18	< 0.1	< 0.18	< 0.18	< 0.18	< 0.18	< 0.18	< 0.18	**0.19**
Benzo (b) Fluoranthene	< 0.2	< 0.1	< 0.2	< 0.2	< 0.2	< 0.1	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	0.18 J
Benzo (g,h,i) Perylene	< 0.2	< 0.1	< 0.2	< 0.2	< 0.2	< 0.1	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	**0.29**
Benzo (k) Fluoranthene	< 0.2	< 0.1	< 0.2	< 0.2	< 0.2	< 0.1	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	**0.21**
Benzoic Acid	< 1.3	< 1.3	< 1.3	< 1.3	< 1.3	< 1.3	< 1.3	< 1.3	< 1.3	< 1.3	< 1.3	< 1.3	< 1.3
Benzyl Alcohol	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25
Bis(2-Chloroethoxy) Methane	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25

Table 4b - 8270C Soil Quality Summary (ug/kg)
LANCER Site, Los Angeles, California

	Area 2			*Area 5*			*Random*						
Parameter	*A2HA1-5'*	*A2HA2-5'*	*A2HA3-5'*	*A5GP1-15'*	*A5GP2-15'*	*A5GP3-15'*	*NHA1-0.5'*	*NHA2-0.5'*	*NHA3-0.5'*	*NHA4-0.5'*	*NHA5-0.5'*	*NHA6-0.5'*	*NHA7-0.5'*
Bis(2-Chloroethyl) Ether	< 1.3	< 1.3	< 1.3	< 1.3	< 1.3	< 1.3	< 1.3	< 1.3	< 1.3	< 1.3	< 1.3	< 1.3	< 1.3
Bis(2-Chloroisopropyl) Ether	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25
Bis(2-Ethylhexyl) Phthalate	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	0.17 J	< 0.25	**0.31**	0.18 J	**0.28**
Butyl Benzyl Phthalate	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25
Chrysene	< 0.2	< 0.1	< 0.2	< 0.2	< 0.2	< 0.1	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	**0.25**
Dibenz (a,h) Anthracene	< 0.2	< 0.1	< 0.2	< 0.2	< 0.2	< 0.1	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2
Dibenzofuran	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25
Diethyl Phthalate	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25
Dimethyl Phthalate	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25
Di-n-Butyl Phthalate	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	**0.68**
Di-n-Octyl Phthalate	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25
Fluoranthene	< 0.2	< 0.1	< 0.2	< 0.2	< 0.2	< 0.1	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	0.17 J
Fluorene	< 0.2	< 0.1	< 0.2	< 0.2	< 0.2	< 0.1	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2
Hexachloro-1,3-Butadiene	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25
Hexachlorobenzene	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25
Hexachlorocyclopentadiene	< 0.75	< 0.75	< 0.75	< 0.75	< 0.75	< 0.75	< 0.75	< 0.75	< 0.75	< 0.75	< 0.75	< 0.75	< 0.75
Hexachloroethane	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25
Indeno (1,2,3-c,d) Pyrene	< 0.2	< 0.1	< 0.2	< 0.2	< 0.2	< 0.1	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	0.18 J
Isophorone	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25
Naphthalene_8270	< 0.2	< 0.1	< 0.2	< 0.2	< 0.2	< 0.1	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2
Nitrobenzene	< 1.3	< 1.3	< 1.3	< 1.3	< 1.3	< 1.3	< 1.3	< 1.3	< 1.3	< 1.3	< 1.3	< 1.3	< 1.3
N-Nitrosodimethylamine	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25
N-Nitroso-di-n-propylamine	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25
N-Nitrosodiphenylamine	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25
Pentachlorophenol	< 1.3	< 1.3	< 1.3	< 1.3	< 1.3	< 1.3	< 1.3	< 1.3	< 1.3	< 1.3	< 1.3	< 1.3	< 1.3
Phenanthrene	< 0.2	< 0.1	< 0.2	< 0.2	< 0.2	< 0.1	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	0.19 J
Phenol	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25
Pyrene	< 0.2	< 0.1	< 0.2	< 0.2	< 0.2	< 0.1	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	**0.73**
Pyridine	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25

NOTES ***J = Analyte was detected at a concentration below the reporting limit. Reported value is estimated.***
Bold values represent compounds detected above laboratory reporting limit.

Table 4b - 8270C Soil Quality Summary (ug/kg)
LANCER Site, Los Angeles, California

	Random												
Parameter	*NHA8-0.5'*	*NHA9-0.5'*	*NHA10-0.5'*	*SHA1-0.5'*	*SHA2-0.5'*	*SHA3-0.5'*	*SHA4-0.5'*	*SHA5-0.5'*	*SHA6-0.5'*	*SHA7-0.5'*	*SHA8-0.5'*	*SHA9-0.5'*	*SHA10-0.5'*
1,2,4-Trichlorobenzene_8270	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25
1,2-Dichlorobenzene_8270	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25
1,3-Dichlorobenzene_8270	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25
1,4-Dichlorobenzene_8270	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25
1-Methylnaphthalene	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2
2,4,5-Trichlorophenol	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25
2,4,6-Trichlorophenol	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25
2,4-Dichlorophenol	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25
2,4-Dimethylphenol	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25
2,4-Dinitrophenol	< 1.3	< 1.3	< 1.3	< 1.3	< 1.3	< 1.3	< 1.3	< 1.3	< 1.3	< 1.3	< 1.3	< 1.3	< 1.3
2,4-Dinitrotoluene	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25
2,6-Dinitrotoluene	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25
2-Chloronaphthalene	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25
2-Chlorophenol	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25
2-Methylnaphthalene	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2
2-Methylphenol	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25
2-Nitroaniline	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25
2-Nitrophenol	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25
3,3'-Dichlorobenzidine	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25
3/4-Methylphenol	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25
3-Nitroaniline	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25
4,6-Dinitro-2-Methylphenol	< 1.3	< 1.3	< 1.3	< 1.3	< 1.3	< 1.3	< 1.3	< 1.3	< 1.3	< 1.3	< 1.3	< 1.3	< 1.3
4-Bromophenyl-Phenyl Ether	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25
4-Chloro-3-Methylphenol	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25
4-Chloroaniline	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25
4-Chlorophenyl-Phenyl Ether	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25
4-Nitroaniline	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25
4-Nitrophenol	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25
Acenaphthene	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2
Acenaphthylene	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2
Aniline	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25
Anthracene	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2
Azobenzene	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25
Benzidine	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0
Benzo (a) Anthracene	< 0.2	< 0.2	< 0.2	< 0.2	0.17 J	< 0.2	< 0.2	< 0.2	0.1 J	< 0.2	< 0.2	< 0.2	< 0.2
Benzo (a) Pyrene	< 0.18	< 0.18	< 0.18	< 0.18	**0.22**	< 0.18	< 0.18	< 0.18	0.14 J	< 0.18	< 0.18	< 0.18	< 0.18
Benzo (b) Fluoranthene	< 0.2	< 0.2	< 0.2	< 0.2	**0.27**	< 0.2	< 0.2	< 0.2	0.1 J	< 0.2	< 0.2	< 0.2	< 0.2
Benzo (g,h,i) Perylene	< 0.2	< 0.2	0.11 J	< 0.2	**0.24**	0.12 J	< 0.2	< 0.2	0.13 J	< 0.2	< 0.2	< 0.2	< 0.2
Benzo (k) Fluoranthene	< 0.2	< 0.2	< 0.2	< 0.2	**0.31**	< 0.2	< 0.2	< 0.2	0.14 J	< 0.2	< 0.2	< 0.2	< 0.2
Benzoic Acid	< 1.3	< 1.3	< 1.3	< 1.3	< 1.3	< 1.3	< 1.3	< 1.3	< 1.3	< 1.3	< 1.3	< 1.3	< 1.3
Benzyl Alcohol	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25
Bis(2-Chloroethoxy) Methane	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25

Table 4b - 8270C Soil Quality Summary (ug/kg)
LANCER Site, Los Angeles, California

						Random							
Parameter	***NHA8-0.5'***	***NHA9-0.5'***	***NHA10-0.5'***	***SHA1-0.5'***	***SHA2-0.5'***	***SHA3-0.5'***	***SHA4-0.5'***	***SHA5-0.5'***	***SHA6-0.5'***	***SHA7-0.5'***	***SHA8-0.5'***	***SHA9-0.5'***	***SHA10-0.5'***
Bis(2-Chloroethyl) Ether	< 1.3	< 1.3	< 1.3	< 1.3	< 1.3	< 1.3	< 1.3	< 1.3	< 1.3	< 1.3	< 1.3	< 1.3	< 1.3
Bis(2-Chloroisopropyl) Ether	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25
Bis(2-Ethylhexyl) Phthalate	< 0.25	0.16 J	**0.48**	**1.7**	**0.64**	0.21 J	0.21 J	< 0.25	**0.48**	**0.54**	**0.52**	**2.7**	**0.33**
Butyl Benzyl Phthalate	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25
Chrysene	< 0.2	< 0.2	< 0.2	< 0.2	**0.24**	< 0.2	< 0.2	< 0.2	0.14 J	< 0.2	< 0.2	< 0.2	< 0.2
Dibenz (a,h) Anthracene	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2
Dibenzofuran	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25
Diethyl Phthalate	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25
Dimethyl Phthalate	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25
Di-n-Butyl Phthalate	< 0.25	< 0.25	**2.7**	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	**0.32**	< 0.25	< 0.25	0.12 J	< 0.25
Di-n-Octyl Phthalate	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25
Fluoranthene	< 0.2	< 0.2	< 0.2	< 0.2	**0.27**	< 0.2	< 0.2	< 0.2	0.15 J	< 0.2	< 0.2	< 0.2	< 0.2
Fluorene	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2
Hexachloro-1,3-Butadiene	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25
Hexachlorobenzene	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25
Hexachlorocyclopentadiene	< 0.75	< 0.75	< 0.75	< 0.75	< 0.75	< 0.75	< 0.75	< 0.75	< 0.75	< 0.75	< 0.75	< 0.75	< 0.75
Hexachloroethane	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25
Indeno (1,2,3-c,d) Pyrene	< 0.2	< 0.2	< 0.2	< 0.2	**0.2**	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2
Isophorone	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25
Naphthalene_8270	**0.21**	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2	0.13 J	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2
Nitrobenzene	< 1.3	< 1.3	< 1.3	< 1.3	< 1.3	< 1.3	< 1.3	< 1.3	< 1.3	< 1.3	< 1.3	< 1.3	< 1.3
N-Nitrosodimethylamine	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25
N-Nitroso-di-n-propylamine	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25
N-Nitrosodiphenylamine	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25
Pentachlorophenol	< 1.3	< 1.3	< 1.3	< 1.3	< 1.3	< 1.3	< 1.3	< 1.3	< 1.3	< 1.3	< 1.3	< 1.3	< 1.3
Phenanthrene	< 0.2	< 0.2	< 0.2	< 0.2	0.12 J	< 0.2	< 0.2	< 0.2	0.13 J	< 0.2	< 0.2	< 0.2	< 0.2
Phenol	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25
Pyrene	< 0.2	< 0.2	**0.2**	< 0.2	**0.56**	**0.24**	< 0.2	< 0.2	**0.46**	0.12 J	0.13 J	0.13 J	0.14 J
Pyridine	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25

NOTES ***J = Analyte was detected at a concentration below the reporting limit. Reported value is estimated.***
Bold values represent compounds detected above laboratory reporting limit.

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Table 5a - 8260B (Detected Analytes Only) Soil Quality Summary (ug/kg)
LANCER SITE, Los Angeles, California

RSLs - commercial

Sample ID	Date Sampled	*1,2,3-TCP*	*2-Butanone*	*Acetone*	*Benzene*	*PCE*	*Toluene*	*TCE*
IND. PRG:		*11*	*NA*	*$6.3x10^{6}$*	*1,300*	*3,400*	*$5.2x10^{5}$*	*110*
TTLC:		*NA*	*NA*	*NA*	*NA*	*NA*	*NA*	*$2.04x10^{6}$*
Area 1		5 ug/kg			1,100	110,000	4.5E+07	6,400
A1HA1-5'	09-09-03	< 1.8	< 18.0	8.5 J	**2.1**	< 0.9	0.66 J	< 1.8
A1HA2-5'	09-09-03	0.8 J	< 18.0	6.1 J	**1.1**	< 0.9	0.59 J	< 1.8
A1HA3-5'	09-09-03	< 1.8	< 18.0	15.0 J	**2.6**	< 0.91	**0.95**	< 1.8
Area 2								
A2HA1-5'	09-09-03	< 1.8	< 18.0	8.8 J	**1.5**	< 0.89	0.62 J	< 1.8
A2HA2-5'	09-09-03	< 1.8	< 18.0	11.0 J	**1.2**	< 0.9	0.52 J	< 1.8
A2HA3-5'	09-09-03	< 1.7	< 17.0	7.8 J	**1.5**	< 0.84	0.69 J	< 1.7
Area 3								
A3GP1-15'	09-04-03	< 2.0	< 20.0	4.7 J	0.24 J	< 1.0	< 1.0	< 2.0
A3GP2-15'	09-02-03	< 2.1	< 21.0	6.2 J	0.52 J	< 1.1	0.58 J	< 2.1
A3GP3-15'	09-02-03	< 2.0	< 20.0	4.8 J	0.34 J	< 1.0	< 1.0	< 2.0
Area 4								
A4GP2-15'	09-02-03	< 2.2	< 22.0	6.6 J	< 1.1	< 1.1	< 1.1	< 2.2
A4GP3-15'	09-02-03	< 2.1	< 21.0	5.3 J	< 1.1	< 1.1	< 1.1	< 2.1
A4GP1-15'	09-02-03	< 2.6	< 26.0	9.1 J	< 1.3	< 1.3	< 1.3	< 2.6
Area 5								
A5GP1-15'	09-04-03	< 2.4	< 24.0	3.9 J	0.35 J	< 1.2	< 1.2	< 2.4
A5GP2-15'	09-04-03	< 2.2	< 22.0	< 22.0	< 1.1	< 1.1	< 1.1	< 2.2

Table 5a - 8260B (Detected Analytes Only) Soil Quality Summary (ug/kg)
LANCER SITE, Los Angeles, California

Sample ID	Date Sampled	*1,2,3-TCP*	*2-Butanone*	*Acetone*	*Benzene*	*PCE*	*Toluene*	*TCE*
IND. PRG:		*11*	*NA*	*$6.3x10^6$*	*1,300*	*3,400*	*$5.2x10^5$*	*110*
TTLC:		*NA*	*NA*	*NA*	*NA*	*NA*	*NA*	*$2.04x10^6$*
A5GP3-15'	09-04-03	< 2.3	< 23.0	< 23.0	0.21 J	< 1.2	< 1.2	< 2.3
Bryant Die Cast								
SHA11-5'	09-09-03	< 1.6	< 16.0	12.0 J	**2.8**	0.56 J	**1.1**	< 1.6
SHA12-5'	09-09-03	< 1.8	< 18.0	8.4 J	**1.6**	< 0.89	0.71 J	< 1.8
SHA13-5'	09-09-03	< 1.7	< 17.0	11.0 J	**3.7**	< 0.85	**2.4**	< 1.7
Former Cabinet Finishing/Painting Area								
NGP4-10'	09-04-03	< 1.8	4.9 J	**18.0**	**1.7**	< 0.9	0.69 J	< 1.8
NGP5-10'	09-04-03	< 2.0	< 20.0	6.2 J	**1.0**	< 1.0	0.49 J	< 2.0
NGP6-10'	09-04-03	< 2.0	< 20.0	18.0 J	**1.3**	< 1.0	0.56 J	< 2.0
Former Machine Shop Area								
SGP7-10'	09-09-03	< 2.0	< 20.0	< 20.0	**1.2**	**1.2**	0.72 J	< 2.0
SGP8-10'	09-09-03	< 1.9	< 19.0	6.6 J	**1.8**	< 0.96	0.78 J	< 1.9
SGP9-10'	09-09-03	< 1.8	< 18.0	7.7 J	**1.4**	0.76 J	0.7 J	0.37 J
Former Painting Area								
SGP4-10'	09-02-03	< 1.7	< 17.0	5.2 J	**1.0**	< 0.86	0.44 J	< 1.7
SGP5-10'	09-02-03	< 1.8	< 18.0	4.9 J	**1.2**	< 0.89	0.53 J	< 1.8
SGP6-10'	09-02-03	< 1.9	< 19.0	4.9 J	**1.0**	< 0.94	0.54 J	< 1.9
Former Plywood Gluing/Drying Area								
NGP1-10'	09-04-03	< 1.9	< 19.0	12.0 J	**2.2**	< 0.95	0.8 J	< 1.9

Table 5a - 8260B (Detected Analytes Only) Soil Quality Summary (ug/kg)
LANCER SITE, Los Angeles, California

Sample ID	Date Sampled	*1,2,3-TCP*	*2-Butanone*	*Acetone*	*Benzene*	*PCE*	*Toluene*	*TCE*
IND. PRG:		*11*	*NA*	*$6.3x10^6$*	*1,300*	*3,400*	*$5.2x10^5$*	*110*
TTLC:		*NA*	*NA*	*NA*	*NA*	*NA*	*NA*	*$2.04x10^6$*
NGP2-10'	09-04-03	< 1.7	< 17.0	12.0 J	**2.3**	< 0.87	0.8 J	< 1.7
NGP3-10'	09-04-03	< 1.6	< 16.0	7.5 J	**1.5**	< 0.78	0.57 J	< 1.6
Former Varnish Room Area								
SGP1-10'	09-02-03	< 1.6	< 16.0	< 16.0	0.62 J	< 0.82	0.31 J	< 1.6
SGP2-10'	09-02-03	< 1.8	< 18.0	5.8 J	**1.1**	< 0.9	0.52 J	< 1.8
SGP3-10'	09-02-03	< 2.2	< 22.0	5.2 J	0.61 J	< 1.1	0.42 J	< 2.2
Random								
NHA1-5'	08-28-03	< 1.8	< 18.0	8.4 J	**1.5**	**5.4**	0.63 J	< 1.8
NHA2-5'	08-28-03	< 1.8	< 18.0	10.0 J	**2.8**	**1.7**	**0.96**	< 1.8
NHA3-5'	08-28-03	< 1.7	< 17.0	13.0 J	**1.4**	**2.2**	0.61 J	< 1.7
NHA4-5'	08-28-03	< 2.1	< 21.0	16.0 J	**2.5**	0.76 J	0.92 J	< 2.1
NHA5-5'	08-28-03	< 1.8	< 18.0	11.0 J	**2.2**	0.52 J	0.87 J	< 1.8
NHA6-5'	08-28-03	< 1.7	< 17.0	11.0 J	**2.3**	0.63 J	**0.98**	< 1.7
NHA7-5'	08-28-03	< 1.8	< 18.0	**18.0**	**3.6**	0.67 J	**1.6**	< 1.8
NHA8-5'	08-28-03	< 1.7	< 17.0	**25.0**	**4.4**	0.58 J	**1.2**	< 1.7
NHA9-5'	08-28-03	< 1.8	< 18.0	**22.0**	**1.4**	< 0.88	0.71 J	< 1.8
NHA10-5'	08-28-03	< 1.7	< 17.0	13.0 J	**3.1**	< 0.86	**1.2**	< 1.7
SHA1-5'	08-28-03	< 2.1	< 21.0	5.4 J	**1.1**	< 1.0	0.44 J	< 2.1
SHA2-5'	08-28-03	< 2.5	< 25.0	8.3 J	1.1 J	< 1.3	< 1.3	< 2.5

Table 5a - 8260B (Detected Analytes Only) Soil Quality Summary (ug/kg)
LANCER SITE, Los Angeles, California

Sample ID	Date Sampled	*1,2,3-TCP*	*2-Butanone*	*Acetone*	*Benzene*	*PCE*	*Toluene*	*TCE*
IND. PRG:		*11*	*NA*	*$6.3x10^6$*	*1,300*	*3,400*	*$5.2x10^5$*	*110*
TTLC:		*NA*	*NA*	*NA*	*NA*	*NA*	*NA*	*$2.04x10^6$*
SHA3-5'	08-28-03	< 1.8	< 18.0	4.8 J	**1.4**	< 0.89	0.45 J	< 1.8
SHA4-5'	08-28-03	< 1.9	< 19.0	6.0 J	**1.9**	< 0.95	0.63 J	< 1.9
SHA5-5'	08-28-03	< 1.9	< 19.0	4.7 J	**1.4**	< 0.95	0.48 J	< 1.9
SHA6-5'	08-28-03	< 1.6	3.6 J	8.2 J	**2.7**	< 0.82	**0.89**	< 1.6
SHA7-5'	08-28-03	< 1.6	< 16.0	13.0 J	**0.9**	< 0.81	0.35 J	< 1.6
SHA8-5'	08-28-03	< 1.7	< 17.0	6.4 J	**1.2**	< 0.84	0.46 J	< 1.7
SHA9-5'	08-28-03	< 1.6	6.4 J	**18.0**	**2.5**	0.43 J	**0.89**	< 1.6
SHA10-5'	08-28-03	< 1.6	< 16.0	9.7 J	**1.2**	0.56 J	0.54 J	< 1.6

NOTES: *1,2,3-TCP = 1,2,3-Trichloropropane*
PCE = Tetrachloroethene
TCE = Trichloroethene
J = Analyte was detected at a concentration below the reporting limit. Reported value is estimated.
Bold values represent compounds detected above laboratory reporting limit.
IND. PRG = Industrial Soil Preliminary Remedial Goals, EPA Region 9, 2002.
TTLC = Total Threshold Limiting Concentration

Table 5b - 8260B Soil Quality Summary (ug/kg)
LANCER Site, Los Angeles, California

	Area 1			*Area 2*			*Area 3*			*Area 4*		
Parameter	*A1HA1-5'*	*A1HA2-5'*	*A1HA3-5'*	*A2HA1-5'*	*A2HA2-5'*	*A2HA3-5'*	*A3GP1-15'*	*A3GP2-15'*	*A3GP3-15'*	*A4GP1-15'*	*A4GP2-15'*	*A4GP3-15'*
1,1,1,2-Tetrachloroethane	< 0.9	< 0.9	< 0.91	< 0.89	< 0.9	< 0.84	< 1.0	< 1.1	< 1.0	< 1.3	< 1.1	< 1.1
1,1,1-Trichloroethane	< 0.9	< 0.9	< 0.91	< 0.89	< 0.9	< 0.84	< 1.0	< 1.1	< 1.0	< 1.3	< 1.1	< 1.1
1,1,2,2-Tetrachloroethane	< 1.8	< 1.8	< 1.8	< 1.8	< 1.8	< 1.7	< 2.0	< 2.1	< 2.0	< 2.6	< 2.2	< 2.1
1,1,2-Trichloroethane	< 0.9	< 0.9	< 0.91	< 0.89	< 0.9	< 0.84	< 1.0	< 1.1	< 1.0	< 1.3	< 1.1	< 1.1
1,1-Dichloroethane	< 0.9	< 0.9	< 0.91	< 0.89	< 0.9	< 0.84	< 1.0	< 1.1	< 1.0	< 1.3	< 1.1	< 1.1
1,1-Dichloroethene	< 0.9	< 0.9	< 0.91	< 0.89	< 0.9	< 0.84	< 1.0	< 1.1	< 1.0	< 1.3	< 1.1	< 1.1
1,1-Dichloropropene	< 1.8	< 1.8	< 1.8	< 1.8	< 1.8	< 1.7	< 2.0	< 2.1	< 2.0	< 2.6	< 2.2	< 2.1
1,2,3-Trichlorobenzene	< 1.8	< 1.8	< 1.8	< 1.8	< 1.8	< 1.7	< 2.0	< 2.1	< 2.0	< 2.6	< 2.2	< 2.1
1,2,3-Trichloropropane	< 1.8	0.8 J	< 1.8	< 1.8	< 1.8	< 1.7	< 2.0	< 2.1	< 2.0	< 2.6	< 2.2	< 2.1
1,2,4-Trichlorobenzene	< 1.8	< 1.8	< 1.8	< 1.8	< 1.8	< 1.7	< 2.0	< 2.1	< 2.0	< 2.6	< 2.2	< 2.1
1,2,4-Trimethylbenzene	< 1.8	< 1.8	< 1.8	< 1.8	< 1.8	< 1.7	< 2.0	< 2.1	< 2.0	< 2.6	< 2.2	< 2.1
1,2-Dibromo-3-Chloropropane	< 4.5	< 4.5	< 4.5	< 4.5	< 4.5	< 4.2	< 5.1	< 5.3	< 5.0	< 6.5	< 5.5	< 5.3
1,2-Dibromoethane	< 0.9	< 0.9	< 0.91	< 0.89	< 0.9	< 0.84	< 1.0	< 1.1	< 1.0	< 1.3	< 1.1	< 1.1
1,2-Dichlorobenzene	< 0.9	< 0.9	< 0.91	< 0.89	< 0.9	< 0.84	< 1.0	< 1.1	< 1.0	< 1.3	< 1.1	< 1.1
1,2-Dichloroethane	< 0.9	< 0.9	< 0.91	< 0.89	< 0.9	< 0.84	< 1.0	< 1.1	< 1.0	< 1.3	< 1.1	< 1.1
1,2-Dichloropropane	< 0.9	< 0.9	< 0.91	< 0.89	< 0.9	< 0.84	< 1.0	< 1.1	< 1.0	< 1.3	< 1.1	< 1.1
1,3,5-Trimethylbenzene	< 1.8	< 1.8	< 1.8	< 1.8	< 1.8	< 1.7	< 2.0	< 2.1	< 2.0	< 2.6	< 2.2	< 2.1
1,3-Dichlorobenzene	< 0.9	< 0.9	< 0.91	< 0.89	< 0.9	< 0.84	< 1.0	< 1.1	< 1.0	< 1.3	< 1.1	< 1.1
1,3-Dichloropropane	< 0.9	< 0.9	< 0.91	< 0.89	< 0.9	< 0.84	< 1.0	< 1.1	< 1.0	< 1.3	< 1.1	< 1.1
1,4-Dichlorobenzene	< 0.9	< 0.9	< 0.91	< 0.89	< 0.9	< 0.84	< 1.0	< 1.1	< 1.0	< 1.3	< 1.1	< 1.1
2,2-Dichloropropane	< 4.5	< 4.5	< 4.5	< 4.5	< 4.5	< 4.2	< 5.1	< 5.3	< 5.0	< 6.5	< 5.5	< 5.3
2-Butanone	< 18.0	< 18.0	< 18.0	< 18.0	< 18.0	< 17.0	< 20.0	< 21.0	< 20.0	< 26.0	< 22.0	< 21.0
2-Chlorotoluene	< 0.9	< 0.9	< 0.91	< 0.89	< 0.9	< 0.84	< 1.0	< 1.1	< 1.0	< 1.3	< 1.1	< 1.1
2-Hexanone	< 18.0	< 18.0	< 18.0	< 18.0	< 18.0	< 17.0	< 20.0	< 21.0	< 20.0	< 26.0	< 22.0	< 21.0
4-Chlorotoluene	< 0.9	< 0.9	< 0.91	< 0.89	< 0.9	< 0.84	< 1.0	< 1.1	< 1.0	< 1.3	< 1.1	< 1.1
4-Methyl-2-Pentanone	< 18.0	< 18.0	< 18.0	< 18.0	< 18.0	< 17.0	< 20.0	< 21.0	< 20.0	< 26.0	< 22.0	< 21.0
Acetone	8.5 J	6.1 J	15.0 J	8.8 J	11.0 J	7.8 J	4.7 J	6.2 J	4.8 J	9.1 J	6.6 J	5.3 J
Benzene	**2.1**	**1.1**	**2.6**	**1.5**	**1.2**	**1.5**	0.24 J	0.52 J	0.34 J	< 1.3	< 1.1	< 1.1
Bromobenzene	< 0.9	< 0.9	< 0.91	< 0.89	< 0.9	< 0.84	< 1.0	< 1.1	< 1.0	< 1.3	< 1.1	< 1.1
Bromochloromethane	< 1.8	< 1.8	< 1.8	< 1.8	< 1.8	< 1.7	< 2.0	< 2.1	< 2.0	< 2.6	< 2.2	< 2.1
Bromodichloromethane	< 0.9	< 0.9	< 0.91	< 0.89	< 0.9	< 0.84	< 1.0	< 1.1	< 1.0	< 1.3	< 1.1	< 1.1
Bromoform	< 4.5	< 4.5	< 4.5	< 4.5	< 4.5	< 4.2	< 5.1	< 5.3	< 5.0	< 6.5	< 5.5	< 5.3
Bromomethane	< 18.0	< 18.0	< 18.0	< 18.0	< 18.0	< 17.0	< 20.0	< 21.0	< 20.0	< 26.0	< 22.0	< 21.0
c-1,2-Dichloroethene	< 0.9	< 0.9	< 0.91	< 0.89	< 0.9	< 0.84	< 1.0	< 1.1	< 1.0	< 1.3	< 1.1	< 1.1
c-1,3-Dichloropropene	< 0.9	< 0.9	< 0.91	< 0.89	< 0.9	< 0.84	< 1.0	< 1.1	< 1.0	< 1.3	< 1.1	< 1.1
Carbon Disulfide	< 9.0	< 9.0	< 9.1	< 8.9	< 9.0	< 8.4	< 10.0	< 11.0	< 10.0	< 13.0	< 11.0	< 11.0
Carbon Tetrachloride	< 0.9	< 0.9	< 0.91	< 0.89	< 0.9	< 0.84	< 1.0	< 1.1	< 1.0	< 1.3	< 1.1	< 1.1
Chlorobenzene	< 0.9	< 0.9	< 0.91	< 0.89	< 0.9	< 0.84	< 1.0	< 1.1	< 1.0	< 1.3	< 1.1	< 1.1
Chloroethane	< 1.8	< 1.8	< 1.8	< 1.8	< 1.8	< 1.7	< 2.0	< 2.1	< 2.0	< 2.6	< 2.2	< 2.1
Chloroform	< 0.9	< 0.9	< 0.91	< 0.89	< 0.9	< 0.84	< 1.0	< 1.1	< 1.0	< 1.3	< 1.1	< 1.1
Chloromethane	< 18.0	< 18.0	< 18.0	< 18.0	< 18.0	< 17.0	< 20.0	< 21.0	< 20.0	< 26.0	< 22.0	< 21.0

Table 5b - 8260B Soil Quality Summary (ug/kg)
LANCER Site, Los Angeles, California

	Area 1			*Area 2*			*Area 3*			*Area 4*		
Parameter	*A1HA1-5'*	*A1HA2-5'*	*A1HA3-5'*	*A2HA1-5'*	*A2HA2-5'*	*A2HA3-5'*	*A3GP1-15'*	*A3GP2-15'*	*A3GP3-15'*	*A4GP1-15'*	*A4GP2-15'*	*A4GP3-15'*
Dibromochloromethane	< 1.8	< 1.8	< 1.8	< 1.8	< 1.8	< 1.7	< 2.0	< 2.1	< 2.0	< 2.6	< 2.2	< 2.1
Dibromomethane	< 0.9	< 0.9	< 0.91	< 0.89	< 0.9	< 0.84	< 1.0	< 1.1	< 1.0	< 1.3	< 1.1	< 1.1
Dichlorodifluoromethane	< 1.8	< 1.8	< 1.8	< 1.8	< 1.8	< 1.7	< 2.0	< 2.1	< 2.0	< 2.6	< 2.2	< 2.1
Ethylbenzene	< 0.9	< 0.9	< 0.91	< 0.89	< 0.9	< 0.84	< 1.0	< 1.1	< 1.0	< 1.3	< 1.1	< 1.1
Isopropylbenzene	< 0.9	< 0.9	< 0.91	< 0.89	< 0.9	< 0.84	< 1.0	< 1.1	< 1.0	< 1.3	< 1.1	< 1.1
Methylene Chloride	< 9.0	< 9.0	< 9.1	< 8.9	< 9.0	< 8.4	< 10.0	< 11.0	< 10.0	< 13.0	< 11.0	< 11.0
Methyl-t-Butyl Ether (MTBE)	< 1.8	< 1.8	< 1.8	< 1.8	< 1.8	< 1.7	< 2.0	< 2.1	< 2.0	< 2.6	< 2.2	< 2.1
Naphthalene	< 9.0	< 9.0	< 9.1	< 8.9	< 9.0	< 8.4	< 10.0	< 11.0	< 10.0	< 13.0	< 11.0	< 11.0
n-Butylbenzene	< 0.9	< 0.9	< 0.91	< 0.89	< 0.9	< 0.84	< 1.0	< 1.1	< 1.0	< 1.3	< 1.1	< 1.1
n-Propylbenzene	< 0.9	< 0.9	< 0.91	< 0.89	< 0.9	< 0.84	< 1.0	< 1.1	< 1.0	< 1.3	< 1.1	< 1.1
o-Xylene	< 0.9	< 0.9	< 0.91	< 0.89	< 0.9	< 0.84	< 1.0	< 1.1	< 1.0	< 1.3	< 1.1	< 1.1
p/m-Xylene	< 1.8	< 1.8	< 1.8	< 1.8	< 1.8	< 1.7	< 2.0	< 2.1	< 2.0	< 2.6	< 2.2	< 2.1
p-Isopropyltoluene	< 0.9	< 0.9	< 0.91	< 0.89	< 0.9	< 0.84	< 1.0	< 1.1	< 1.0	< 1.3	< 1.1	< 1.1
sec-Butylbenzene	< 0.9	< 0.9	< 0.91	< 0.89	< 0.9	< 0.84	< 1.0	< 1.1	< 1.0	< 1.3	< 1.1	< 1.1
Styrene	< 0.9	< 0.9	< 0.91	< 0.89	< 0.9	< 0.84	< 1.0	< 1.1	< 1.0	< 1.3	< 1.1	< 1.1
t-1,2-Dichloroethene	< 0.9	< 0.9	< 0.91	< 0.89	< 0.9	< 0.84	< 1.0	< 1.1	< 1.0	< 1.3	< 1.1	< 1.1
t-1,3-Dichloropropene	< 1.8	< 1.8	< 1.8	< 1.8	< 1.8	< 1.7	< 2.0	< 2.1	< 2.0	< 2.6	< 2.2	< 2.1
tert-Butylbenzene	< 0.9	< 0.9	< 0.91	< 0.89	< 0.9	< 0.84	< 1.0	< 1.1	< 1.0	< 1.3	< 1.1	< 1.1
Tetrachloroethene	< 0.9	< 0.9	< 0.91	< 0.89	< 0.9	< 0.84	< 1.0	< 1.1	< 1.0	< 1.3	< 1.1	< 1.1
Toluene	0.66 J	0.59 J	**0.95**	0.62 J	0.52 J	0.69 J	< 1.0	0.58 J	< 1.0	< 1.3	< 1.1	< 1.1
Trichloroethene	< 1.8	< 1.8	< 1.8	< 1.8	< 1.8	< 1.7	< 2.0	< 2.1	< 2.0	< 2.6	< 2.2	< 2.1
Trichlorofluoromethane	< 9.0	< 9.0	< 9.1	< 8.9	< 9.0	< 8.4	< 10.0	< 11.0	< 10.0	< 13.0	< 11.0	< 11.0
Vinyl Acetate	< 9.0	< 9.0	< 9.1	< 8.9	< 9.0	< 8.4	< 10.0	< 11.0	< 10.0	< 13.0	< 11.0	< 11.0
Vinyl Chloride	< 0.9	< 0.9	< 0.91	< 0.89	< 0.9	< 0.84	< 1.0	< 1.1	< 1.0	< 1.3	< 1.1	< 1.1

NOTES: ***J = Analyte was detected at a concentration below the reporting limit. Reported value is estimated.***
Bold values represent compounds detected above laboratory reporting limit.

Table 5b - 8260B Soil Quality Summary (ug/kg)
LANCER Site, Los Angeles, California

	Area 5			*Bryant Die Cast*			*Former Painting Area*			*Former Varnish Room Area*		
Parameter	*A5GP1-15'*	*A5GP2-15'*	*A5GP3-15'*	*SHA11-5'*	*SHA12-5'*	*SHA13-5'*	*SGP4-10'*	*SGP5-10'*	*SGP6-10'*	*SGP1-10'*	*SGP2-10'*	*SGP3-10'*
1,1,1,2-Tetrachloroethane	< 1.2	< 1.1	< 1.2	< 0.82	< 0.89	< 0.85	< 0.86	< 0.89	< 0.94	< 0.82	< 0.9	< 1.1
1,1,1-Trichloroethane	< 1.2	< 1.1	< 1.2	< 0.82	< 0.89	< 0.85	< 0.86	< 0.89	< 0.94	< 0.82	< 0.9	< 1.1
1,1,2,2-Tetrachloroethane	< 2.4	< 2.2	< 2.3	< 1.6	< 1.8	< 1.7	< 1.7	< 1.8	< 1.9	< 1.6	< 1.8	< 2.2
1,1,2-Trichloroethane	< 1.2	< 1.1	< 1.2	< 0.82	< 0.89	< 0.85	< 0.86	< 0.89	< 0.94	< 0.82	< 0.9	< 1.1
1,1-Dichloroethane	< 1.2	< 1.1	< 1.2	< 0.82	< 0.89	< 0.85	< 0.86	< 0.89	< 0.94	< 0.82	< 0.9	< 1.1
1,1-Dichloroethene	< 1.2	< 1.1	< 1.2	< 0.82	< 0.89	< 0.85	< 0.86	< 0.89	< 0.94	< 0.82	< 0.9	< 1.1
1,1-Dichloropropene	< 2.4	< 2.2	< 2.3	< 1.6	< 1.8	< 1.7	< 1.7	< 1.8	< 1.9	< 1.6	< 1.8	< 2.2
1,2,3-Trichlorobenzene	< 2.4	< 2.2	< 2.3	< 1.6	< 1.8	< 1.7	< 1.7	< 1.8	< 1.9	< 1.6	< 1.8	< 2.2
1,2,3-Trichloropropane	< 2.4	< 2.2	< 2.3	< 1.6	< 1.8	< 1.7	< 1.7	< 1.8	< 1.9	< 1.6	< 1.8	< 2.2
1,2,4-Trichlorobenzene	< 2.4	< 2.2	< 2.3	< 1.6	< 1.8	< 1.7	< 1.7	< 1.8	< 1.9	< 1.6	< 1.8	< 2.2
1,2,4-Trimethylbenzene	< 2.4	< 2.2	< 2.3	< 1.6	< 1.8	< 1.7	< 1.7	< 1.8	< 1.9	< 1.6	< 1.8	< 2.2
1,2-Dibromo-3-Chloropropane	< 6.0	< 5.5	< 5.8	< 4.1	< 4.5	< 4.2	< 4.3	< 4.4	< 4.7	< 4.1	< 4.5	< 5.5
1,2-Dibromoethane	< 1.2	< 1.1	< 1.2	< 0.82	< 0.89	< 0.85	< 0.86	< 0.89	< 0.94	< 0.82	< 0.9	< 1.1
1,2-Dichlorobenzene	< 1.2	< 1.1	< 1.2	< 0.82	< 0.89	< 0.85	< 0.86	< 0.89	< 0.94	< 0.82	< 0.9	< 1.1
1,2-Dichloroethane	< 1.2	< 1.1	< 1.2	< 0.82	< 0.89	< 0.85	< 0.86	< 0.89	< 0.94	< 0.82	< 0.9	< 1.1
1,2-Dichloropropane	< 1.2	< 1.1	< 1.2	< 0.82	< 0.89	< 0.85	< 0.86	< 0.89	< 0.94	< 0.82	< 0.9	< 1.1
1,3,5-Trimethylbenzene	< 2.4	< 2.2	< 2.3	< 1.6	< 1.8	< 1.7	< 1.7	< 1.8	< 1.9	< 1.6	< 1.8	< 2.2
1,3-Dichlorobenzene	< 1.2	< 1.1	< 1.2	< 0.82	< 0.89	< 0.85	< 0.86	< 0.89	< 0.94	< 0.82	< 0.9	< 1.1
1,3-Dichloropropane	< 1.2	< 1.1	< 1.2	< 0.82	< 0.89	< 0.85	< 0.86	< 0.89	< 0.94	< 0.82	< 0.9	< 1.1
1,4-Dichlorobenzene	< 1.2	< 1.1	< 1.2	< 0.82	< 0.89	< 0.85	< 0.86	< 0.89	< 0.94	< 0.82	< 0.9	< 1.1
2,2-Dichloropropane	< 6.0	< 5.5	< 5.8	< 4.1	< 4.5	< 4.2	< 4.3	< 4.4	< 4.7	< 4.1	< 4.5	< 5.5
2-Butanone	< 24.0	< 22.0	< 23.0	< 16.0	< 18.0	< 17.0	< 17.0	< 18.0	< 19.0	< 16.0	< 18.0	< 22.0
2-Chlorotoluene	< 1.2	< 1.1	< 1.2	< 0.82	< 0.89	< 0.85	< 0.86	< 0.89	< 0.94	< 0.82	< 0.9	< 1.1
2-Hexanone	< 24.0	< 22.0	< 23.0	< 16.0	< 18.0	< 17.0	< 17.0	< 18.0	< 19.0	< 16.0	< 18.0	< 22.0
4-Chlorotoluene	< 1.2	< 1.1	< 1.2	< 0.82	< 0.89	< 0.85	< 0.86	< 0.89	< 0.94	< 0.82	< 0.9	< 1.1
4-Methyl-2-Pentanone	< 24.0	< 22.0	< 23.0	< 16.0	< 18.0	< 17.0	< 17.0	< 18.0	< 19.0	< 16.0	< 18.0	< 22.0
Acetone	3.9 J	< 22.0	< 23.0	12.0 J	8.4 J	11.0 J	5.2 J	4.9 J	4.9 J	< 16.0	5.8 J	5.2 J
Benzene	0.35 J	< 1.1	0.21 J	**2.8**	**1.6**	**3.7**	**1.0**	**1.2**	**1.0**	0.62 J	**1.1**	0.61 J
Bromobenzene	< 1.2	< 1.1	< 1.2	< 0.82	< 0.89	< 0.85	< 0.86	< 0.89	< 0.94	< 0.82	< 0.9	< 1.1
Bromochloromethane	< 2.4	< 2.2	< 2.3	< 1.6	< 1.8	< 1.7	< 1.7	< 1.8	< 1.9	< 1.6	< 1.8	< 2.2
Bromodichloromethane	< 1.2	< 1.1	< 1.2	< 0.82	< 0.89	< 0.85	< 0.86	< 0.89	< 0.94	< 0.82	< 0.9	< 1.1
Bromoform	< 6.0	< 5.5	< 5.8	< 4.1	< 4.5	< 4.2	< 4.3	< 4.4	< 4.7	< 4.1	< 4.5	< 5.5
Bromomethane	< 24.0	< 22.0	< 23.0	< 16.0	< 18.0	< 17.0	< 17.0	< 18.0	< 19.0	< 16.0	< 18.0	< 22.0
c-1,2-Dichloroethene	< 1.2	< 1.1	< 1.2	< 0.82	< 0.89	< 0.85	< 0.86	< 0.89	< 0.94	< 0.82	< 0.9	< 1.1
c-1,3-Dichloropropene	< 1.2	< 1.1	< 1.2	< 0.82	< 0.89	< 0.85	< 0.86	< 0.89	< 0.94	< 0.82	< 0.9	< 1.1
Carbon Disulfide	< 12.0	< 11.0	< 12.0	< 8.2	< 8.9	< 8.5	< 8.6	< 8.9	< 9.4	< 8.2	< 9.0	< 11.0
Carbon Tetrachloride	< 1.2	< 1.1	< 1.2	< 0.82	< 0.89	< 0.85	< 0.86	< 0.89	< 0.94	< 0.82	< 0.9	< 1.1
Chlorobenzene	< 1.2	< 1.1	< 1.2	< 0.82	< 0.89	< 0.85	< 0.86	< 0.89	< 0.94	< 0.82	< 0.9	< 1.1
Chloroethane	< 2.4	< 2.2	< 2.3	< 1.6	< 1.8	< 1.7	< 1.7	< 1.8	< 1.9	< 1.6	< 1.8	< 2.2
Chloroform	< 1.2	< 1.1	< 1.2	< 0.82	< 0.89	< 0.85	< 0.86	< 0.89	< 0.94	< 0.82	< 0.9	< 1.1
Chloromethane	< 24.0	< 22.0	< 23.0	< 16.0	< 18.0	< 17.0	< 17.0	< 18.0	< 19.0	< 16.0	< 18.0	< 22.0

Table 5b - 8260B Soil Quality Summary (ug/kg)
LANCER Site, Los Angeles, California

	Area 5			*Bryant Die Cast*			*Former Painting Area*			*Former Varnish Room Area*		
Parameter	*A5GP1-15'*	*A5GP2-15'*	*A5GP3-15'*	*SHA11-5'*	*SHA12-5'*	*SHA13-5'*	*SGP4-10'*	*SGP5-10'*	*SGP6-10'*	*SGP1-10'*	*SGP2-10'*	*SGP3-10'*
Dibromochloromethane	< 2.4	< 2.2	< 2.3	< 1.6	< 1.8	< 1.7	< 1.7	< 1.8	< 1.9	< 1.6	< 1.8	< 2.2
Dibromomethane	< 1.2	< 1.1	< 1.2	< 0.82	< 0.89	< 0.85	< 0.86	< 0.89	< 0.94	< 0.82	< 0.9	< 1.1
Dichlorodifluoromethane	< 2.4	< 2.2	< 2.3	< 1.6	< 1.8	< 1.7	< 1.7	< 1.8	< 1.9	< 1.6	< 1.8	< 2.2
Ethylbenzene	< 1.2	< 1.1	< 1.2	< 0.82	< 0.89	< 0.85	< 0.86	< 0.89	< 0.94	< 0.82	< 0.9	< 1.1
Isopropylbenzene	< 1.2	< 1.1	< 1.2	< 0.82	< 0.89	< 0.85	< 0.86	< 0.89	< 0.94	< 0.82	< 0.9	< 1.1
Methylene Chloride	< 12.0	< 11.0	< 12.0	< 8.2	< 8.9	< 8.5	< 8.6	< 8.9	< 9.4	< 8.2	< 9.0	< 11.0
Methyl-t-Butyl Ether (MTBE)	< 2.4	< 2.2	< 2.3	< 1.6	< 1.8	< 1.7	< 1.7	< 1.8	< 1.9	< 1.6	< 1.8	< 2.2
Naphthalene	< 12.0	< 11.0	< 12.0	< 8.2	< 8.9	< 8.5	< 8.6	< 8.9	< 9.4	< 8.2	< 9.0	< 11.0
n-Butylbenzene	< 1.2	< 1.1	< 1.2	< 0.82	< 0.89	< 0.85	< 0.86	< 0.89	< 0.94	< 0.82	< 0.9	< 1.1
n-Propylbenzene	< 1.2	< 1.1	< 1.2	< 0.82	< 0.89	< 0.85	< 0.86	< 0.89	< 0.94	< 0.82	< 0.9	< 1.1
o-Xylene	< 1.2	< 1.1	< 1.2	< 0.82	< 0.89	< 0.85	< 0.86	< 0.89	< 0.94	< 0.82	< 0.9	< 1.1
p/m-Xylene	< 2.4	< 2.2	< 2.3	< 1.6	< 1.8	< 1.7	< 1.7	< 1.8	< 1.9	< 1.6	< 1.8	< 2.2
p-Isopropyltoluene	< 1.2	< 1.1	< 1.2	< 0.82	< 0.89	< 0.85	< 0.86	< 0.89	< 0.94	< 0.82	< 0.9	< 1.1
sec-Butylbenzene	< 1.2	< 1.1	< 1.2	< 0.82	< 0.89	< 0.85	< 0.86	< 0.89	< 0.94	< 0.82	< 0.9	< 1.1
Styrene	< 1.2	< 1.1	< 1.2	< 0.82	< 0.89	< 0.85	< 0.86	< 0.89	< 0.94	< 0.82	< 0.9	< 1.1
t-1,2-Dichloroethene	< 1.2	< 1.1	< 1.2	< 0.82	< 0.89	< 0.85	< 0.86	< 0.89	< 0.94	< 0.82	< 0.9	< 1.1
t-1,3-Dichloropropene	< 2.4	< 2.2	< 2.3	< 1.6	< 1.8	< 1.7	< 1.7	< 1.8	< 1.9	< 1.6	< 1.8	< 2.2
tert-Butylbenzene	< 1.2	< 1.1	< 1.2	< 0.82	< 0.89	< 0.85	< 0.86	< 0.89	< 0.94	< 0.82	< 0.9	< 1.1
Tetrachloroethene	< 1.2	< 1.1	< 1.2	0.56 J	< 0.89	< 0.85	< 0.86	< 0.89	< 0.94	< 0.82	< 0.9	< 1.1
Toluene	< 1.2	< 1.1	< 1.2	**1.1**	0.71 J	**2.4**	0.44 J	0.53 J	0.54 J	0.31 J	0.52 J	0.42 J
Trichloroethene	< 2.4	< 2.2	< 2.3	< 1.6	< 1.8	< 1.7	< 1.7	< 1.8	< 1.9	< 1.6	< 1.8	< 2.2
Trichlorofluoromethane	< 12.0	< 11.0	< 12.0	< 8.2	< 8.9	< 8.5	< 8.6	< 8.9	< 9.4	< 8.2	< 9.0	< 11.0
Vinyl Acetate	< 12.0	< 11.0	< 12.0	< 8.2	< 8.9	< 8.5	< 8.6	< 8.9	< 9.4	< 8.2	< 9.0	< 11.0
Vinyl Chloride	< 1.2	< 1.1	< 1.2	< 0.82	< 0.89	< 0.85	< 0.86	< 0.89	< 0.94	< 0.82	< 0.9	< 1.1

NOTES: ***J = Analyte was detected at a concentration below the reporting limit. Reported value is estimated.***
Bold values represent compounds detected above laboratory reporting limit.

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Table 5b - 8260B Soil Quality Summary (ug/kg)
LANCER Site, Los Angeles, California

	Former Mach. Shop Area			*Frm. Plywood Glue/Dry Area*			*Frm. Cab. Finish/Paint Area*			*Random*		
Parameter	*SGP7-10'*	*SGP8-10'*	*SGP9-10'*	*NGP1-10'*	*NGP2-10'*	*NGP3-10'*	*NGP4-10'*	*NGP5-10'*	*NGP6-10'*	*NHA1-5'*	*NHA2-5'*	*NHA3-5'*
1,1,1,2-Tetrachloroethane	< 0.98	< 0.96	< 0.88	< 0.95	< 0.87	< 0.78	< 0.9	< 1.0	< 1.0	< 0.89	< 0.9	< 0.83
1,1,1-Trichloroethane	< 0.98	< 0.96	< 0.88	< 0.95	< 0.87	< 0.78	< 0.9	< 1.0	< 1.0	< 0.89	< 0.9	< 0.83
1,1,2,2-Tetrachloroethane	< 2.0	< 1.9	< 1.8	< 1.9	< 1.7	< 1.6	< 1.8	< 2.0	< 2.0	< 1.8	< 1.8	< 1.7
1,1,2-Trichloroethane	< 0.98	< 0.96	< 0.88	< 0.95	< 0.87	< 0.78	< 0.9	< 1.0	< 1.0	< 0.89	< 0.9	< 0.83
1,1-Dichloroethane	< 0.98	< 0.96	< 0.88	< 0.95	< 0.87	< 0.78	< 0.9	< 1.0	< 1.0	< 0.89	< 0.9	< 0.83
1,1-Dichloroethene	< 0.98	< 0.96	< 0.88	< 0.95	< 0.87	< 0.78	< 0.9	< 1.0	< 1.0	< 0.89	< 0.9	< 0.83
1,1-Dichloropropene	< 2.0	< 1.9	< 1.8	< 1.9	< 1.7	< 1.6	< 1.8	< 2.0	< 2.0	< 1.8	< 1.8	< 1.7
1,2,3-Trichlorobenzene	< 2.0	< 1.9	< 1.8	< 1.9	< 1.7	< 1.6	< 1.8	< 2.0	< 2.0	< 1.8	< 1.8	< 1.7
1,2,3-Trichloropropane	< 2.0	< 1.9	< 1.8	< 1.9	< 1.7	< 1.6	< 1.8	< 2.0	< 2.0	< 1.8	< 1.8	< 1.7
1,2,4-Trichlorobenzene	< 2.0	< 1.9	< 1.8	< 1.9	< 1.7	< 1.6	< 1.8	< 2.0	< 2.0	< 1.8	< 1.8	< 1.7
1,2,4-Trimethylbenzene	< 2.0	< 1.9	< 1.8	< 1.9	< 1.7	< 1.6	< 1.8	< 2.0	< 2.0	< 1.8	< 1.8	< 1.7
1,2-Dibromo-3-Chloropropane	< 4.9	< 4.8	< 4.4	< 4.7	< 4.3	< 3.9	< 4.5	< 5.1	< 5.0	< 4.4	< 4.5	< 4.2
1,2-Dibromoethane	< 0.98	< 0.96	< 0.88	< 0.95	< 0.87	< 0.78	< 0.9	< 1.0	< 1.0	< 0.89	< 0.9	< 0.83
1,2-Dichlorobenzene	< 0.98	< 0.96	< 0.88	< 0.95	< 0.87	< 0.78	< 0.9	< 1.0	< 1.0	< 0.89	< 0.9	< 0.83
1,2-Dichloroethane	< 0.98	< 0.96	< 0.88	< 0.95	< 0.87	< 0.78	< 0.9	< 1.0	< 1.0	< 0.89	< 0.9	< 0.83
1,2-Dichloropropane	< 0.98	< 0.96	< 0.88	< 0.95	< 0.87	< 0.78	< 0.9	< 1.0	< 1.0	< 0.89	< 0.9	< 0.83
1,3,5-Trimethylbenzene	< 2.0	< 1.9	< 1.8	< 1.9	< 1.7	< 1.6	< 1.8	< 2.0	< 2.0	< 1.8	< 1.8	< 1.7
1,3-Dichlorobenzene	< 0.98	< 0.96	< 0.88	< 0.95	< 0.87	< 0.78	< 0.9	< 1.0	< 1.0	< 0.89	< 0.9	< 0.83
1,3-Dichloropropane	< 0.98	< 0.96	< 0.88	< 0.95	< 0.87	< 0.78	< 0.9	< 1.0	< 1.0	< 0.89	< 0.9	< 0.83
1,4-Dichlorobenzene	< 0.98	< 0.96	< 0.88	< 0.95	< 0.87	< 0.78	< 0.9	< 1.0	< 1.0	< 0.89	< 0.9	< 0.83
2,2-Dichloropropane	< 4.9	< 4.8	< 4.4	< 4.7	< 4.3	< 3.9	< 4.5	< 5.1	< 5.0	< 4.4	< 4.5	< 4.2
2-Butanone	< 20.0	< 19.0	< 18.0	< 19.0	< 17.0	< 16.0	4.9 J	< 20.0	< 20.0	< 18.0	< 18.0	< 17.0
2-Chlorotoluene	< 0.98	< 0.96	< 0.88	< 0.95	< 0.87	< 0.78	< 0.9	< 1.0	< 1.0	< 0.89	< 0.9	< 0.83
2-Hexanone	< 20.0	< 19.0	< 18.0	< 19.0	< 17.0	< 16.0	< 18.0	< 20.0	< 20.0	< 18.0	< 18.0	< 17.0
4-Chlorotoluene	< 0.98	< 0.96	< 0.88	< 0.95	< 0.87	< 0.78	< 0.9	< 1.0	< 1.0	< 0.89	< 0.9	< 0.83
4-Methyl-2-Pentanone	< 20.0	< 19.0	< 18.0	< 19.0	< 17.0	< 16.0	< 18.0	< 20.0	< 20.0	< 18.0	< 18.0	< 17.0
Acetone	< 20.0	6.6 J	7.7 J	12.0 J	12.0 J	7.5 J	**18.0**	6.2 J	18.0 J	8.4 J	10.0 J	13.0 J
Benzene	**1.2**	**1.8**	**1.4**	**2.2**	**2.3**	**1.5**	**1.7**	**1.0**	**1.3**	**1.5**	**2.8**	**1.4**
Bromobenzene	< 0.98	< 0.96	< 0.88	< 0.95	< 0.87	< 0.78	< 0.9	< 1.0	< 1.0	< 0.89	< 0.9	< 0.83
Bromochloromethane	< 2.0	< 1.9	< 1.8	< 1.9	< 1.7	< 1.6	< 1.8	< 2.0	< 2.0	< 1.8	< 1.8	< 1.7
Bromodichloromethane	< 0.98	< 0.96	< 0.88	< 0.95	< 0.87	< 0.78	< 0.9	< 1.0	< 1.0	< 0.89	< 0.9	< 0.83
Bromoform	< 4.9	< 4.8	< 4.4	< 4.7	< 4.3	< 3.9	< 4.5	< 5.1	< 5.0	< 4.4	< 4.5	< 4.2
Bromomethane	< 20.0	< 19.0	< 18.0	< 19.0	< 17.0	< 16.0	< 18.0	< 20.0	< 20.0	< 18.0	< 18.0	< 17.0
c-1,2-Dichloroethene	< 0.98	< 0.96	< 0.88	< 0.95	< 0.87	< 0.78	< 0.9	< 1.0	< 1.0	< 0.89	< 0.9	< 0.83
c-1,3-Dichloropropene	< 0.98	< 0.96	< 0.88	< 0.95	< 0.87	< 0.78	< 0.9	< 1.0	< 1.0	< 0.89	< 0.9	< 0.83
Carbon Disulfide	< 9.8	< 9.6	< 8.8	< 9.5	< 8.7	< 7.8	< 9.0	< 10.0	< 10.0	< 8.9	< 9.0	< 8.3
Carbon Tetrachloride	< 0.98	< 0.96	< 0.88	< 0.95	< 0.87	< 0.78	< 0.9	< 1.0	< 1.0	< 0.89	< 0.9	< 0.83
Chlorobenzene	< 0.98	< 0.96	< 0.88	< 0.95	< 0.87	< 0.78	< 0.9	< 1.0	< 1.0	< 0.89	< 0.9	< 0.83
Chloroethane	< 2.0	< 1.9	< 1.8	< 1.9	< 1.7	< 1.6	< 1.8	< 2.0	< 2.0	< 1.8	< 1.8	< 1.7
Chloroform	< 0.98	< 0.96	< 0.88	< 0.95	< 0.87	< 0.78	< 0.9	< 1.0	< 1.0	< 0.89	< 0.9	< 0.83
Chloromethane	< 20.0	< 19.0	< 18.0	< 19.0	< 17.0	< 16.0	< 18.0	< 20.0	< 20.0	< 18.0	< 18.0	< 17.0

Table 5b - 8260B Soil Quality Summary (ug/kg)
LANCER Site, Los Angeles, California

	Former Mach. Shop Area			*Frm. Plywood Glue/Dry Area*			*Frm. Cab. Finish/Paint Area*			*Random*		
Parameter	***SGP7-10'***	***SGP8-10'***	***SGP9-10'***	***NGP1-10'***	***NGP2-10'***	***NGP3-10'***	***NGP4-10'***	***NGP5-10'***	***NGP6-10'***	***NHA1-5'***	***NHA2-5'***	***NHA3-5'***
Dibromochloromethane	< 2.0	< 1.9	< 1.8	< 1.9	< 1.7	< 1.6	< 1.8	< 2.0	< 2.0	< 1.8	< 1.8	< 1.7
Dibromomethane	< 0.98	< 0.96	< 0.88	< 0.95	< 0.87	< 0.78	< 0.9	< 1.0	< 1.0	< 0.89	< 0.9	< 0.83
Dichlorodifluoromethane	< 2.0	< 1.9	< 1.8	< 1.9	< 1.7	< 1.6	< 1.8	< 2.0	< 2.0	< 1.8	< 1.8	< 1.7
Ethylbenzene	< 0.98	< 0.96	< 0.88	< 0.95	< 0.87	< 0.78	< 0.9	< 1.0	< 1.0	< 0.89	< 0.9	< 0.83
Isopropylbenzene	< 0.98	< 0.96	< 0.88	< 0.95	< 0.87	< 0.78	< 0.9	< 1.0	< 1.0	< 0.89	< 0.9	< 0.83
Methylene Chloride	< 9.8	< 9.6	< 8.8	< 9.5	< 8.7	< 7.8	< 9.0	< 10.0	< 10.0	< 8.9	< 9.0	< 8.3
Methyl-t-Butyl Ether (MTBE)	< 2.0	< 1.9	< 1.8	< 1.9	< 1.7	< 1.6	< 1.8	< 2.0	< 2.0	< 1.8	< 1.8	< 1.7
Naphthalene	< 9.8	< 9.6	< 8.8	< 9.5	< 8.7	< 7.8	< 9.0	< 10.0	< 10.0	< 8.9	< 9.0	< 8.3
n-Butylbenzene	< 0.98	< 0.96	< 0.88	< 0.95	< 0.87	< 0.78	< 0.9	< 1.0	< 1.0	< 0.89	< 0.9	< 0.83
n-Propylbenzene	< 0.98	< 0.96	< 0.88	< 0.95	< 0.87	< 0.78	< 0.9	< 1.0	< 1.0	< 0.89	< 0.9	< 0.83
o-Xylene	< 0.98	< 0.96	< 0.88	< 0.95	< 0.87	< 0.78	< 0.9	< 1.0	< 1.0	< 0.89	< 0.9	< 0.83
p/m-Xylene	< 2.0	< 1.9	< 1.8	< 1.9	< 1.7	< 1.6	< 1.8	< 2.0	< 2.0	< 1.8	< 1.8	< 1.7
p-Isopropyltoluene	< 0.98	< 0.96	< 0.88	< 0.95	< 0.87	< 0.78	< 0.9	< 1.0	< 1.0	< 0.89	< 0.9	< 0.83
sec-Butylbenzene	< 0.98	< 0.96	< 0.88	< 0.95	< 0.87	< 0.78	< 0.9	< 1.0	< 1.0	< 0.89	< 0.9	< 0.83
Styrene	< 0.98	< 0.96	< 0.88	< 0.95	< 0.87	< 0.78	< 0.9	< 1.0	< 1.0	< 0.89	< 0.9	< 0.83
t-1,2-Dichloroethene	< 0.98	< 0.96	< 0.88	< 0.95	< 0.87	< 0.78	< 0.9	< 1.0	< 1.0	< 0.89	< 0.9	< 0.83
t-1,3-Dichloropropene	< 2.0	< 1.9	< 1.8	< 1.9	< 1.7	< 1.6	< 1.8	< 2.0	< 2.0	< 1.8	< 1.8	< 1.7
tert-Butylbenzene	< 0.98	< 0.96	< 0.88	< 0.95	< 0.87	< 0.78	< 0.9	< 1.0	< 1.0	< 0.89	< 0.9	< 0.83
Tetrachloroethene	**1.2**	< 0.96	0.76 J	< 0.95	< 0.87	< 0.78	< 0.9	< 1.0	< 1.0	**5.4**	**1.7**	**2.2**
Toluene	0.72 J	0.78 J	0.7 J	0.8 J	0.8 J	0.57 J	0.69 J	0.49 J	0.56 J	0.63 J	**0.96**	0.61 J
Trichloroethene	< 2.0	< 1.9	0.37 J	< 1.9	< 1.7	< 1.6	< 1.8	< 2.0	< 2.0	< 1.8	< 1.8	< 1.7
Trichlorofluoromethane	< 9.8	< 9.6	< 8.8	< 9.5	< 8.7	< 7.8	< 9.0	< 10.0	< 10.0	< 8.9	< 9.0	< 8.3
Vinyl Acetate	< 9.8	< 9.6	< 8.8	< 9.5	< 8.7	< 7.8	< 9.0	< 10.0	< 10.0	< 8.9	< 9.0	< 8.3
Vinyl Chloride	< 0.98	< 0.96	< 0.88	< 0.95	< 0.87	< 0.78	< 0.9	< 1.0	< 1.0	< 0.89	< 0.9	< 0.83

NOTES: ***J = Analyte was detected at a concentration below the reporting limit. Reported value is estimated.***
Bold values represent compounds detected above laboratory reporting limit.

Table 5b - 8260B Soil Quality Summary (ug/kg)
LANCER Site, Los Angeles, California

	Random											
Parameter	***NHA4-5'***	***NHA5-5'***	***NHA6-5'***	***NHA7-5'***	***NHA8-5'***	***NHA9-5'***	***NHA10-5'***	***SHA1-5'***	***SHA2-5'***	***SHA3-5'***	***SHA4-5'***	***SHA5-5'***
1,1,1,2-Tetrachloroethane	< 1.1	< 0.88	< 0.86	< 0.91	< 0.86	< 0.88	< 0.86	< 1.0	< 1.3	< 0.89	< 0.95	< 0.95
1,1,1-Trichloroethane	< 1.1	< 0.88	< 0.86	< 0.91	< 0.86	< 0.88	< 0.86	< 1.0	< 1.3	< 0.89	< 0.95	< 0.95
1,1,2,2-Tetrachloroethane	< 2.1	< 1.8	< 1.7	< 1.8	< 1.7	< 1.8	< 1.7	< 2.1	< 2.5	< 1.8	< 1.9	< 1.9
1,1,2-Trichloroethane	< 1.1	< 0.88	< 0.86	< 0.91	< 0.86	< 0.88	< 0.86	< 1.0	< 1.3	< 0.89	< 0.95	< 0.95
1,1-Dichloroethane	< 1.1	< 0.88	< 0.86	< 0.91	< 0.86	< 0.88	< 0.86	< 1.0	< 1.3	< 0.89	< 0.95	< 0.95
1,1-Dichloroethene	< 1.1	< 0.88	< 0.86	< 0.91	< 0.86	< 0.88	< 0.86	< 1.0	< 1.3	< 0.89	< 0.95	< 0.95
1,1-Dichloropropene	< 2.1	< 1.8	< 1.7	< 1.8	< 1.7	< 1.8	< 1.7	< 2.1	< 2.5	< 1.8	< 1.9	< 1.9
1,2,3-Trichlorobenzene	< 2.1	< 1.8	< 1.7	< 1.8	< 1.7	< 1.8	< 1.7	< 2.1	< 2.5	< 1.8	< 1.9	< 1.9
1,2,3-Trichloropropane	< 2.1	< 1.8	< 1.7	< 1.8	< 1.7	< 1.8	< 1.7	< 2.1	< 2.5	< 1.8	< 1.9	< 1.9
1,2,4-Trichlorobenzene	< 2.1	< 1.8	< 1.7	< 1.8	< 1.7	< 1.8	< 1.7	< 2.1	< 2.5	< 1.8	< 1.9	< 1.9
1,2,4-Trimethylbenzene	< 2.1	< 1.8	< 1.7	< 1.8	< 1.7	< 1.8	< 1.7	< 2.1	< 2.5	< 1.8	< 1.9	< 1.9
1,2-Dibromo-3-Chloropropane	< 5.3	< 4.4	< 4.3	< 4.6	< 4.3	< 4.4	< 4.3	< 5.2	< 6.3	< 4.4	< 4.8	< 4.8
1,2-Dibromoethane	< 1.1	< 0.88	< 0.86	< 0.91	< 0.86	< 0.88	< 0.86	< 1.0	< 1.3	< 0.89	< 0.95	< 0.95
1,2-Dichlorobenzene	< 1.1	< 0.88	< 0.86	< 0.91	< 0.86	< 0.88	< 0.86	< 1.0	< 1.3	< 0.89	< 0.95	< 0.95
1,2-Dichloroethane	< 1.1	< 0.88	< 0.86	< 0.91	< 0.86	< 0.88	< 0.86	< 1.0	< 1.3	< 0.89	< 0.95	< 0.95
1,2-Dichloropropane	< 1.1	< 0.88	< 0.86	< 0.91	< 0.86	< 0.88	< 0.86	< 1.0	< 1.3	< 0.89	< 0.95	< 0.95
1,3,5-Trimethylbenzene	< 2.1	< 1.8	< 1.7	< 1.8	< 1.7	< 1.8	< 1.7	< 2.1	< 2.5	< 1.8	< 1.9	< 1.9
1,3-Dichlorobenzene	< 1.1	< 0.88	< 0.86	< 0.91	< 0.86	< 0.88	< 0.86	< 1.0	< 1.3	< 0.89	< 0.95	< 0.95
1,3-Dichloropropane	< 1.1	< 0.88	< 0.86	< 0.91	< 0.86	< 0.88	< 0.86	< 1.0	< 1.3	< 0.89	< 0.95	< 0.95
1,4-Dichlorobenzene	< 1.1	< 0.88	< 0.86	< 0.91	< 0.86	< 0.88	< 0.86	< 1.0	< 1.3	< 0.89	< 0.95	< 0.95
2,2-Dichloropropane	< 5.3	< 4.4	< 4.3	< 4.6	< 4.3	< 4.4	< 4.3	< 5.2	< 6.3	< 4.4	< 4.8	< 4.8
2-Butanone	< 21.0	< 18.0	< 17.0	< 18.0	< 17.0	< 18.0	< 17.0	< 21.0	< 25.0	< 18.0	< 19.0	< 19.0
2-Chlorotoluene	< 1.1	< 0.88	< 0.86	< 0.91	< 0.86	< 0.88	< 0.86	< 1.0	< 1.3	< 0.89	< 0.95	< 0.95
2-Hexanone	< 21.0	< 18.0	< 17.0	< 18.0	< 17.0	< 18.0	< 17.0	< 21.0	< 25.0	< 18.0	< 19.0	< 19.0
4-Chlorotoluene	< 1.1	< 0.88	< 0.86	< 0.91	< 0.86	< 0.88	< 0.86	< 1.0	< 1.3	< 0.89	< 0.95	< 0.95
4-Methyl-2-Pentanone	< 21.0	< 18.0	< 17.0	< 18.0	< 17.0	< 18.0	< 17.0	< 21.0	< 25.0	< 18.0	< 19.0	< 19.0
Acetone	16.0 J	11.0 J	11.0 J	**18.0**	**25.0**	**22.0**	13.0 J	5.4 J	8.3 J	4.8 J	6.0 J	4.7 J
Benzene	**2.5**	**2.2**	**2.3**	**3.6**	**4.4**	**1.4**	**3.1**	**1.1**	1.1 J	**1.4**	**1.9**	**1.4**
Bromobenzene	< 1.1	< 0.88	< 0.86	< 0.91	< 0.86	< 0.88	< 0.86	< 1.0	< 1.3	< 0.89	< 0.95	< 0.95
Bromochloromethane	< 2.1	< 1.8	< 1.7	< 1.8	< 1.7	< 1.8	< 1.7	< 2.1	< 2.5	< 1.8	< 1.9	< 1.9
Bromodichloromethane	< 1.1	< 0.88	< 0.86	< 0.91	< 0.86	< 0.88	< 0.86	< 1.0	< 1.3	< 0.89	< 0.95	< 0.95
Bromoform	< 5.3	< 4.4	< 4.3	< 4.6	< 4.3	< 4.4	< 4.3	< 5.2	< 6.3	< 4.4	< 4.8	< 4.8
Bromomethane	< 21.0	< 18.0	< 17.0	< 18.0	< 17.0	< 18.0	< 17.0	< 21.0	< 25.0	< 18.0	< 19.0	< 19.0
c-1,2-Dichloroethene	< 1.1	< 0.88	< 0.86	< 0.91	< 0.86	< 0.88	< 0.86	< 1.0	< 1.3	< 0.89	< 0.95	< 0.95
c-1,3-Dichloropropene	< 1.1	< 0.88	< 0.86	< 0.91	< 0.86	< 0.88	< 0.86	< 1.0	< 1.3	< 0.89	< 0.95	< 0.95
Carbon Disulfide	< 11.0	< 8.8	< 8.6	< 9.1	< 8.6	< 8.8	< 8.6	< 10.0	< 13.0	< 8.9	< 9.5	< 9.5
Carbon Tetrachloride	< 1.1	< 0.88	< 0.86	< 0.91	< 0.86	< 0.88	< 0.86	< 1.0	< 1.3	< 0.89	< 0.95	< 0.95
Chlorobenzene	< 1.1	< 0.88	< 0.86	< 0.91	< 0.86	< 0.88	< 0.86	< 1.0	< 1.3	< 0.89	< 0.95	< 0.95
Chloroethane	< 2.1	< 1.8	< 1.7	< 1.8	< 1.7	< 1.8	< 1.7	< 2.1	< 2.5	< 1.8	< 1.9	< 1.9
Chloroform	< 1.1	< 0.88	< 0.86	< 0.91	< 0.86	< 0.88	< 0.86	< 1.0	< 1.3	< 0.89	< 0.95	< 0.95
Chloromethane	< 21.0	< 18.0	< 17.0	< 18.0	< 17.0	< 18.0	< 17.0	< 21.0	< 25.0	< 18.0	< 19.0	< 19.0

Table 5b - 8260B Soil Quality Summary (ug/kg)
LANCER Site, Los Angeles, California

	Random											
Parameter	***NHA4-5'***	***NHA5-5'***	***NHA6-5'***	***NHA7-5'***	***NHA8-5'***	***NHA9-5'***	***NHA10-5'***	***SHA1-5'***	***SHA2-5'***	***SHA3-5'***	***SHA4-5'***	***SHA5-5'***
Dibromochloromethane	< 2.1	< 1.8	< 1.7	< 1.8	< 1.7	< 1.8	< 1.7	< 2.1	< 2.5	< 1.8	< 1.9	< 1.9
Dibromomethane	< 1.1	< 0.88	< 0.86	< 0.91	< 0.86	< 0.88	< 0.86	< 1.0	< 1.3	< 0.89	< 0.95	< 0.95
Dichlorodifluoromethane	< 2.1	< 1.8	< 1.7	< 1.8	< 1.7	< 1.8	< 1.7	< 2.1	< 2.5	< 1.8	< 1.9	< 1.9
Ethylbenzene	< 1.1	< 0.88	< 0.86	< 0.91	< 0.86	< 0.88	< 0.86	< 1.0	< 1.3	< 0.89	< 0.95	< 0.95
Isopropylbenzene	< 1.1	< 0.88	< 0.86	< 0.91	< 0.86	< 0.88	< 0.86	< 1.0	< 1.3	< 0.89	< 0.95	< 0.95
Methylene Chloride	< 11.0	< 8.8	< 8.6	< 9.1	< 8.6	< 8.8	< 8.6	< 10.0	< 13.0	< 8.9	< 9.5	< 9.5
Methyl-t-Butyl Ether (MTBE)	< 2.1	< 1.8	< 1.7	< 1.8	< 1.7	< 1.8	< 1.7	< 2.1	< 2.5	< 1.8	< 1.9	< 1.9
Naphthalene	< 11.0	< 8.8	< 8.6	< 9.1	< 8.6	< 8.8	< 8.6	< 10.0	< 13.0	< 8.9	< 9.5	< 9.5
n-Butylbenzene	< 1.1	< 0.88	< 0.86	< 0.91	< 0.86	< 0.88	< 0.86	< 1.0	< 1.3	< 0.89	< 0.95	< 0.95
n-Propylbenzene	< 1.1	< 0.88	< 0.86	< 0.91	< 0.86	< 0.88	< 0.86	< 1.0	< 1.3	< 0.89	< 0.95	< 0.95
o-Xylene	< 1.1	< 0.88	< 0.86	< 0.91	< 0.86	< 0.88	< 0.86	< 1.0	< 1.3	< 0.89	< 0.95	< 0.95
p/m-Xylene	< 2.1	< 1.8	< 1.7	< 1.8	< 1.7	< 1.8	< 1.7	< 2.1	< 2.5	< 1.8	< 1.9	< 1.9
p-Isopropyltoluene	< 1.1	< 0.88	< 0.86	< 0.91	< 0.86	< 0.88	< 0.86	< 1.0	< 1.3	< 0.89	< 0.95	< 0.95
sec-Butylbenzene	< 1.1	< 0.88	< 0.86	< 0.91	< 0.86	< 0.88	< 0.86	< 1.0	< 1.3	< 0.89	< 0.95	< 0.95
Styrene	< 1.1	< 0.88	< 0.86	< 0.91	< 0.86	< 0.88	< 0.86	< 1.0	< 1.3	< 0.89	< 0.95	< 0.95
t-1,2-Dichloroethene	< 1.1	< 0.88	< 0.86	< 0.91	< 0.86	< 0.88	< 0.86	< 1.0	< 1.3	< 0.89	< 0.95	< 0.95
t-1,3-Dichloropropene	< 2.1	< 1.8	< 1.7	< 1.8	< 1.7	< 1.8	< 1.7	< 2.1	< 2.5	< 1.8	< 1.9	< 1.9
tert-Butylbenzene	< 1.1	< 0.88	< 0.86	< 0.91	< 0.86	< 0.88	< 0.86	< 1.0	< 1.3	< 0.89	< 0.95	< 0.95
Tetrachloroethene	0.76 J	0.52 J	0.63 J	0.67 J	0.58 J	< 0.88	< 0.86	< 1.0	< 1.3	< 0.89	< 0.95	< 0.95
Toluene	0.92 J	0.87 J	**0.98**	**1.6**	**1.2**	0.71 J	**1.2**	0.44 J	< 1.3	0.45 J	0.63 J	0.48 J
Trichloroethene	< 2.1	< 1.8	< 1.7	< 1.8	< 1.7	< 1.8	< 1.7	< 2.1	< 2.5	< 1.8	< 1.9	< 1.9
Trichlorofluoromethane	< 11.0	< 8.8	< 8.6	< 9.1	< 8.6	< 8.8	< 8.6	< 10.0	< 13.0	< 8.9	< 9.5	< 9.5
Vinyl Acetate	< 11.0	< 8.8	< 8.6	< 9.1	< 8.6	< 8.8	< 8.6	< 10.0	< 13.0	< 8.9	< 9.5	< 9.5
Vinyl Chloride	< 1.1	< 0.88	< 0.86	< 0.91	< 0.86	< 0.88	< 0.86	< 1.0	< 1.3	< 0.89	< 0.95	< 0.95

NOTES: ***J = Analyte was detected at a concentration below the reporting limit. Reported value is estimated.***
Bold values represent compounds detected above laboratory reporting limit.

Table 5b - 8260B Soil Quality Summary (ug/kg)
LANCER Site, Los Angeles, California

	Random				
Parameter	*SHA6-5'*	*SHA7-5'*	*SHA8-5'*	*SHA9-5'*	*SHA10-5'*
1,1,1,2-Tetrachloroethane	< 0.82	< 0.81	< 0.84	< 0.79	< 0.78
1,1,1-Trichloroethane	< 0.82	< 0.81	< 0.84	< 0.79	< 0.78
1,1,2,2-Tetrachloroethane	< 1.6	< 1.6	< 1.7	< 1.6	< 1.6
1,1,2-Trichloroethane	< 0.82	< 0.81	< 0.84	< 0.79	< 0.78
1,1-Dichloroethane	< 0.82	< 0.81	< 0.84	< 0.79	< 0.78
1,1-Dichloroethene	< 0.82	< 0.81	< 0.84	< 0.79	< 0.78
1,1-Dichloropropene	< 1.6	< 1.6	< 1.7	< 1.6	< 1.6
1,2,3-Trichlorobenzene	< 1.6	< 1.6	< 1.7	< 1.6	< 1.6
1,2,3-Trichloropropane	< 1.6	< 1.6	< 1.7	< 1.6	< 1.6
1,2,4-Trichlorobenzene	< 1.6	< 1.6	< 1.7	< 1.6	< 1.6
1,2,4-Trimethylbenzene	< 1.6	< 1.6	< 1.7	< 1.6	< 1.6
1,2-Dibromo-3-Chloropropane	< 4.1	< 4.1	< 4.2	< 4.0	< 3.9
1,2-Dibromoethane	< 0.82	< 0.81	< 0.84	< 0.79	< 0.78
1,2-Dichlorobenzene	< 0.82	< 0.81	< 0.84	< 0.79	< 0.78
1,2-Dichloroethane	< 0.82	< 0.81	< 0.84	< 0.79	< 0.78
1,2-Dichloropropane	< 0.82	< 0.81	< 0.84	< 0.79	< 0.78
1,3,5-Trimethylbenzene	< 1.6	< 1.6	< 1.7	< 1.6	< 1.6
1,3-Dichlorobenzene	< 0.82	< 0.81	< 0.84	< 0.79	< 0.78
1,3-Dichloropropane	< 0.82	< 0.81	< 0.84	< 0.79	< 0.78
1,4-Dichlorobenzene	< 0.82	< 0.81	< 0.84	< 0.79	< 0.78
2,2-Dichloropropane	< 4.1	< 4.1	< 4.2	< 4.0	< 3.9
2-Butanone	3.6 J	< 16.0	< 17.0	6.4 J	< 16.0
2-Chlorotoluene	< 0.82	< 0.81	< 0.84	< 0.79	< 0.78
2-Hexanone	< 16.0	< 16.0	< 17.0	< 16.0	< 16.0
4-Chlorotoluene	< 0.82	< 0.81	< 0.84	< 0.79	< 0.78
4-Methyl-2-Pentanone	< 16.0	< 16.0	< 17.0	< 16.0	< 16.0
Acetone	8.2 J	13.0 J	6.4 J	**18.0**	9.7 J
Benzene	**2.7**	**0.9**	**1.2**	**2.5**	**1.2**
Bromobenzene	< 0.82	< 0.81	< 0.84	< 0.79	< 0.78
Bromochloromethane	< 1.6	< 1.6	< 1.7	< 1.6	< 1.6
Bromodichloromethane	< 0.82	< 0.81	< 0.84	< 0.79	< 0.78
Bromoform	< 4.1	< 4.1	< 4.2	< 4.0	< 3.9
Bromomethane	< 16.0	< 16.0	< 17.0	< 16.0	< 16.0
c-1,2-Dichloroethene	< 0.82	< 0.81	< 0.84	< 0.79	< 0.78
c-1,3-Dichloropropene	< 0.82	< 0.81	< 0.84	< 0.79	< 0.78
Carbon Disulfide	< 8.2	< 8.1	< 8.4	< 7.9	< 7.8
Carbon Tetrachloride	< 0.82	< 0.81	< 0.84	< 0.79	< 0.78
Chlorobenzene	< 0.82	< 0.81	< 0.84	< 0.79	< 0.78
Chloroethane	< 1.6	< 1.6	< 1.7	< 1.6	< 1.6
Chloroform	< 0.82	< 0.81	< 0.84	< 0.79	< 0.78
Chloromethane	< 16.0	< 16.0	< 17.0	< 16.0	< 16.0

Table 5b - 8260B Soil Quality Summary (ug/kg)
LANCER Site, Los Angeles, California

	Random				
Parameter	*SHA6-5'*	*SHA7-5'*	*SHA8-5'*	*SHA9-5'*	*SHA10-5'*
Dibromochloromethane	< 1.6	< 1.6	< 1.7	< 1.6	< 1.6
Dibromomethane	< 0.82	< 0.81	< 0.84	< 0.79	< 0.78
Dichlorodifluoromethane	< 1.6	< 1.6	< 1.7	< 1.6	< 1.6
Ethylbenzene	< 0.82	< 0.81	< 0.84	< 0.79	< 0.78
Isopropylbenzene	< 0.82	< 0.81	< 0.84	< 0.79	< 0.78
Methylene Chloride	< 8.2	< 8.1	< 8.4	< 7.9	< 7.8
Methyl-t-Butyl Ether (MTBE)	< 1.6	< 1.6	< 1.7	< 1.6	< 1.6
Naphthalene	< 8.2	< 8.1	< 8.4	< 7.9	< 7.8
n-Butylbenzene	< 0.82	< 0.81	< 0.84	< 0.79	< 0.78
n-Propylbenzene	< 0.82	< 0.81	< 0.84	< 0.79	< 0.78
o-Xylene	< 0.82	< 0.81	< 0.84	< 0.79	< 0.78
p/m-Xylene	< 1.6	< 1.6	< 1.7	< 1.6	< 1.6
p-Isopropyltoluene	< 0.82	< 0.81	< 0.84	< 0.79	< 0.78
sec-Butylbenzene	< 0.82	< 0.81	< 0.84	< 0.79	< 0.78
Styrene	< 0.82	< 0.81	< 0.84	< 0.79	< 0.78
t-1,2-Dichloroethene	< 0.82	< 0.81	< 0.84	< 0.79	< 0.78
t-1,3-Dichloropropene	< 1.6	< 1.6	< 1.7	< 1.6	< 1.6
tert-Butylbenzene	< 0.82	< 0.81	< 0.84	< 0.79	< 0.78
Tetrachloroethene	< 0.82	< 0.81	< 0.84	0.43 J	0.56 J
Toluene	**0.89**	0.35 J	0.46 J	**0.89**	0.54 J
Trichloroethene	< 1.6	< 1.6	< 1.7	< 1.6	< 1.6
Trichlorofluoromethane	< 8.2	< 8.1	< 8.4	< 7.9	< 7.8
Vinyl Acetate	< 8.2	< 8.1	< 8.4	< 7.9	< 7.8
Vinyl Chloride	< 0.82	< 0.81	< 0.84	< 0.79	< 0.78

NOTES: ***J = Analyte was detected at a concentration below the reporting limit. Reported value is estimated.***
Bold values represent compounds detected above laboratory reporting limit.

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Table 6 - 6010B Soil Quality Summary (mg/kg)
LANCER Site, Los Angeles, California

Sample ID	Date Sample	*Sb*	*As*	*Ba*	*Be*	*Cd*	*Cr*	*Cr VI*	*Co*	*Cu*	*Pb*	*Hg*	*Mo*	*Ni*	*Se*	*Ag*	*Th*	*V*	*Zn*
IND. PRG:		*410*	*1.6*	*67,000*	*1,900*	*450*	*450*	*64*	*1,900*	*41,000*	*750*	*NA*	*5,100*	*NA*	*5,100*	*5,100*	*67*	*7,200*	*100,000*
TTLC:		*500*	*500*	*10,000*	*75*	*100*	*2,500*	*500*	*8,000*	*2,500*	*1,000*	*20*	*3,500*	*2,000*	*100*	*500*	*700*	*2,400*	*5,000*
STLC:		*15.0*	*5.0*	*100*	*0.75*	*1.0*	*5.0*	*5.0*	*80*	*25*	*5.0*	*0.2*	*350*	*20*	*1.0*	*5.0*	*7.0*	*24*	*250*
TCLP:		*NA*	*5.0*	*100*	*NA*	*1.0*	*5.0*	*NA*	*NA*	*NA*	*5.0*	*0.2*	*NA*	*NA*	*1.0*	*5.0*	*NA*	*NA*	*NA*
Area 3																			
A3GP1-15'	09-04-03	< 0.75	< 0.75	**36.7**	0.07 J	0.13 J	**3.43**		**2.91**	**10.4**	0.45 J	0.03 J	< 0.25	**2.44**	< 0.75	< 0.25	0.19 J	**10.9**	**41.1**
A3GP2-15'	09-02-03	< 0.75	< 0.75	**32.5**	0.09 J	0.07 J	**3.04**		**2.65**	**91.4**	**0.54**	**0.08**	0.08 J	**2.07**	< 0.75	< 0.25	0.46 J	**8.08**	**51.4**
A3GP3-15'	09-02-03	< 0.75	< 0.75	**51.4**	0.17 J	0.11 J	**4.16**		**4.04**	**45.0**	**0.79**	0.03 J	< 0.25	**3.54**	< 0.75	< 0.25	0.47 J	**12.8**	**38.6**
Area 4																			
A4GP2-15'	09-02-03	< 0.75	< 0.75	**33.4**	0.1 J	0.08 J	**3.78**		**2.96**	**179.0**	**0.53**	0.03 J	< 0.25	**2.46**	< 0.75	< 0.25	< 0.75	**9.4**	**109.0**
A4GP3-15'	09-02-03	< 0.75	< 0.75	**42.3**	0.1 J	0.09 J	**5.02**		**3.53**	**142.0**	0.42 J	0.03 J	**0.29**	**3.0**	< 0.75	< 0.25	0.62 J	**10.7**	**91.8**
A4GP1-15'	09-02-03	< 0.75	< 0.75	**36.3**	0.1 J	0.07 J	**4.15**		**2.77**	**176.0**	0.45 J	0.03 J	0.09 J	**3.95**	< 0.75	< 0.25	< 0.75	**8.84**	**93.4**
Bryant Die Cast																			
SHA11-0.5'	09-09-03	0.56 J	**4.27**	**529.0**	**0.38**	**1.99**	**28.4**	0.04 J	**8.71**	**63.4**	**334.0**	**0.28**	**0.39**	**15.9**	< 0.75	< 0.25	**1.41**	**31.0**	**835.0**
SHA11-0.5'T	09-09-03										**0.16**								
SHA11-0.5'W	09-09-03										**11.6**								
SHA12-0.5'	09-09-03	**1.39**	**2.96**	**211.0**	**0.5**	**0.61**	**22.1**	0.21 J	**12.6**	**42.7**	**74.0**	**0.3**	0.06 J	**15.5**	< 0.75	< 0.25	**2.14**	**43.3**	**197.0**
SHA12-0.5'W	09-09-03										**1.45**								
SHA13-0.5'	09-09-03	**1.04**	**2.65**	**175.0**	**0.56**	**0.77**	**22.2**	0.2 J	**12.6**	**28.7**	**10.5**	0.06 J	< 0.25	**15.1**	< 0.75	< 0.25	**4.92**	**49.9**	**176.0**
Former Cabinet Finishing/Painting Area																			
NGP4-0.5'	09-04-03	< 0.75	0.71 J	**156.0**	**0.42**	0.38 J	**19.0**	0.24 J	**11.4**	**21.5**	**25.6**	**0.23**	< 0.25	**12.2**	< 0.75	< 0.25	**3.75**	**42.0**	**84.1**
NGP5-0.5'	09-04-03	0.3 J	< 0.75	**118.0**	**0.41**	0.29 J	**16.4**	0.16 J	**11.1**	**17.7**	**3.27**	0.06 J	< 0.25	**11.0**	< 0.75	< 0.25	**2.84**	**40.3**	**72.8**

Table 6 - 6010B Soil Quality Summary (mg/kg)
LANCER Site, Los Angeles, California

Sample ID	Date Sample	Sb	As	Ba	Be	Cd	Cr	Cr VI	Co	Cu	Pb	Hg	Mo	Ni	Se	Ag	Th	V	Zn
IND. PRG:		*410*	*1.6*	*67,000*	*1,900*	*450*	*450*	*64*	*1,900*	*41,000*	*750*	*NA*	*5,100*	*NA*	*5,100*	*5,100*	*67*	*7,200*	*100,000*
TTLC:		*500*	*500*	*10,000*	*75*	*100*	*2,500*	*500*	*8,000*	*2,500*	*1,000*	*20*	*3,500*	*2,000*	*100*	*500*	*700*	*2,400*	*5,000*
STLC:		*15.0*	*5.0*	*100*	*0.75*	*1.0*	*5.0*	*5.0*	*80*	*25*	*5.0*	*0.2*	*350*	*20*	*1.0*	*5.0*	*7.0*	*24*	*250*
TCLP:		*NA*	*5.0*	*100*	*NA*	*1.0*	*5.0*	*NA*	*NA*	*NA*	*5.0*	*0.2*	*NA*	*NA*	*1.0*	*5.0*	*NA*	*NA*	*NA*
NGP6-0.5'	09-04-03	0.29 J	1.4	131.0	0.43	0.34 J	16.7	0.23 J	10.9	21.2	5.9	0.09	< 0.25	11.7	< 0.75	< 0.25	2.01	39.8	74.0
Former Machine Shop Area																			
SGP7-0.5'	09-09-03	1.48	< 0.75	152.0	0.44	0.37 J	18.2	0.03 J	11.9	28.4	13.0	0.13	< 0.25	13.3	< 0.75	< 0.25	5.65	40.7	72.5
SGP8-0.5'	09-09-03	1.79	0.94	274.0	0.42	1.28	21.6	0.53 J	11.4	82.2	175.0	0.26	< 0.25	14.1	< 0.75	< 0.25	3.16	38.4	375.0
SGP8-0.5'T	09-09-03										0.1								
SGP8-0.5'W	09-09-03										35.6								
SGP9-0.5'	09-09-03	0.61 J	2.09	80.6	0.22 J	0.17 J	8.22	< 40.0	6.07	19.6	22.2	0.06 J	< 0.25	7.77	< 0.75	< 0.25	1.6	19.7	72.9
Former Painting Area																			
SGP4-0.5'	09-02-03	< 0.75	1.37	170.0	0.52	0.73	20.3	< 40.0	12.8	28.4	49.1	0.33	< 0.25	14.8	< 0.75	< 0.25	1.1	44.3	115.0
SGP5-0.5'	09-02-03	< 0.75	1.18	146.0	0.51	0.58	18.5	0.16 J	12.1	32.6	4.33	0.07 J	< 0.25	13.7	< 0.75	< 0.25	1.44	42.5	69.2
SGP6-0.5'	09-02-03	< 0.75	1.26	144.0	0.43	0.53	17.2	< 40.0	11.5	25.7	9.0	0.09	< 0.25	13.0	< 0.75	< 0.25	1.22	38.7	64.4
Former Varnish Room Area																			
SGP1-0.5'	09-02-03	< 0.75	2.13	152.0	0.35	0.68	14.2	0.01 J	8.91	23.9	64.2	0.14	< 0.25	9.75	< 0.75	< 0.25	< 0.75	29.7	120.0
SGP1-0.5'W	09-02-03										2.13								
SGP2-0.5'	09-02-03	< 0.75	1.73	128.0	0.41	0.5 J	15.2	< 40.0	10.0	24.5	7.07	0.13	< 0.25	11.3	< 0.75	< 0.25	2.25	34.2	67.6
SGP3-0.5'	09-02-03	< 0.75	1.59	146.0	0.42	0.76	16.8	0.09 J	10.8	23.4	28.4	0.16	< 0.25	12.1	< 0.75	< 0.25	0.91	36.2	146.0
Random																			
NHA1-0.5'	08-28-03	< 0.75	1.07	125.0	0.29	0.35 J	32.7	0.16 J	9.05	20.7	25.6	0.08 J	< 0.25	18.8	< 0.75	< 0.25	< 0.75	29.4	79.8
NHA2-0.5'	08-28-03	< 0.75	5.38	163.0	0.43	0.97	24.9	0.12 J	9.11	29.9	53.4	0.11	0.5	18.5	< 0.75	< 0.25	1.61	40.7	167.0

Table 6 - 6010B Soil Quality Summary (mg/kg)
LANCER Site, Los Angeles, California

Sample ID	Date Sample	Sb	As	Ba	Be	Cd	Cr	Cr VI	Co	Cu	Pb	Hg	Mo	Ni	Se	Ag	Th	V	Zn
IND. PRG:		*410*	*1.6*	*67,000*	*1,900*	*450*	*450*	*64*	*1,900*	*41,000*	*750*	*NA*	*5,100*	*NA*	*5,100*	*5,100*	*67*	*7,200*	*100,000*
TTLC:		*500*	*500*	*10,000*	*75*	*100*	*2,500*	*500*	*8,000*	*2,500*	*1,000*	*20*	*3,500*	*2,000*	*100*	*500*	*700*	*2,400*	*5,000*
STLC:		*15.0*	*5.0*	*100*	*0.75*	*1.0*	*5.0*	*5.0*	*80*	*25*	*5.0*	*0.2*	*350*	*20*	*1.0*	*5.0*	*7.0*	*24*	*250*
TCLP:		*NA*	*5.0*	*100*	*NA*	*1.0*	*5.0*	*NA*	*NA*	*NA*	*5.0*	*0.2*	*NA*	*NA*	*1.0*	*5.0*	*NA*	*NA*	*NA*
NHA2-0.5'W	08-28-03										**1.76**								
NHA3-0.5'	08-28-03	< 0.75	**1.88**	**124.0**	**0.31**	0.47 J	**14.1**	0.35 J	**8.82**	**33.5**	**42.1**	**0.09**	< 0.25	**10.0**	< 0.75	< 0.25	**0.83**	**29.1**	**97.2**
NHA4-0.5'	08-28-03	< 0.75	**1.37**	**150.0**	**0.39**	**0.59**	**17.7**	0.15 J	**11.0**	**27.0**	**17.6**	0.08 J	< 0.25	**13.2**	< 0.75	< 0.25	0.46 J	**37.8**	**84.1**
NHA5-0.5'	08-28-03	< 0.75	**1.52**	**149.0**	**0.26**	**0.74**	**13.2**	0.16 J	**7.43**	**57.6**	**86.8**	**0.11**	0.11 J	**10.8**	< 0.75	< 0.25	**0.8**	**26.2**	**211.0**
NHA5-0.5'W	08-28-03										**3.3**								
NHA6-0.5'	08-28-03	< 0.75	**1.68**	**150.0**	**0.3**	**0.59**	**12.0**	0.17 J	**7.8**	**28.0**	**42.0**	**0.23**	< 0.25	**11.1**	< 0.75	< 0.25	< 0.75	**30.3**	**99.1**
NHA7-0.5'	08-28-03	**35.0**	**6.69**	**666.0**	**0.44**	**2.41**	**26.1**	0.24 J	**12.0**	**474.0**	**4,700.0**	**0.21**	< 0.25	**25.0**	< 0.75	**0.53**	**1.16**	**43.4**	**899.0**
NHA7-0.5'RA	08-28-03										**98.6**								
NHA7-0.5'T	08-28-03										< 0.1								
NHA7-0.5'W	08-28-03									**3.13**	**5.33**								
NHA7-3'	08-28-03										**19.6**								
NHA8-0.5'	08-28-03	< 0.75	0.66 J	**96.8**	0.21 J	0.38 J	**9.63**	0.21 J	**5.57**	**43.5**	**29.7**	**0.18**	< 0.25	**7.14**	< 0.75	< 0.25	0.12 J	**19.3**	**139.0**
NHA9-0.5'	08-28-03	< 0.75	**1.11**	**170.0**	**0.34**	**0.66**	**45.9**	0.11 J	**9.43**	**33.1**	**57.4**	**0.15**	**0.5**	**26.9**	< 0.75	< 0.25	**1.33**	**32.0**	**194.0**
NHA9-0.5'W	08-28-03										**2.51**								
NHA10-0.5'	08-28-03	0.57 J	**8.22**	**11,300.0**	**0.45**	**3.13**	**30.4**	0.4 J	**11.9**	**130.0**	**726.0**	**0.18**	< 0.25	**14.9**	< 0.75	**0.33**	**1.1**	**28.4**	**23,700.0**
NHA10-0.5'RA	08-28-03			**2,880.0**															**2,490.0**
NHA10-0.5'T	08-28-03			**1.7**							**0.16**								
NHA10-0.5'W	08-28-03			**23.4**							**59.5**								**309.0**

Table 6 - 6010B Soil Quality Summary (mg/kg)
LANCER Site, Los Angeles, California

Sample ID	Date Sample	Sb	As	Ba	Be	Cd	Cr	Cr VI	Co	Cu	Pb	Hg	Mo	Ni	Se	Ag	Th	V	Zn
IND. PRG:		*410*	*1.6*	*67,000*	*1,900*	*450*	*450*	*64*	*1,900*	*41,000*	*750*	*NA*	*5,100*	*NA*	*5,100*	*5,100*	*67*	*7,200*	*100,000*
TTLC:		*500*	*500*	*10,000*	*75*	*100*	*2,500*	*500*	*8,000*	*2,500*	*1,000*	*20*	*3,500*	*2,000*	*100*	*500*	*700*	*2,400*	*5,000*
STLC:		*15.0*	*5.0*	*100*	*0.75*	*1.0*	*5.0*	*5.0*	*80*	*25*	*5.0*	*0.2*	*350*	*20*	*1.0*	*5.0*	*7.0*	*24*	*250*
TCLP:		*NA*	*5.0*	*100*	*NA*	*1.0*	*5.0*	*NA*	*NA*	*NA*	*5.0*	*0.2*	*NA*	*NA*	*1.0*	*5.0*	*NA*	*NA*	*NA*
NHA10-3'	08-28-03			**143.0**							**2.52**								**58.8**
SHA1-0.5'	08-28-03	0.22 J	**10.7**	**176.0**	**0.35**	**0.86**	**15.3**	0.16 J	**7.84**	**37.5**	**102.0**		0.08 J	**12.0**	< 0.75	< 0.25	**1.49**	**33.1**	**236.0**
SHA1-0.5'T	08-28-03										< 0.1								
SHA1-0.5'W	08-28-03										**5.19**								
SHA2-0.5'	08-28-03	< 0.75	0.25 J	**268.0**	**0.38**	0.44 J	**15.5**	0.35 J	**9.74**	**29.1**	**85.0**		< 0.25	**10.9**	< 0.75	< 0.25	**2.35**	**31.7**	**123.0**
SHA2-0.5'W	08-28-03										**5.54**								
SHA3-0.5'	08-28-03	0.27 J	0.43 J	**182.0**	**0.39**	**0.58**	**19.0**	0.41 J	**9.61**	**44.8**	**138.0**		< 0.25	**12.8**	< 0.75	< 0.25	0.14 J	**33.4**	**213.0**
SHA3-0.5'T	08-28-03										< 0.1								
SHA3-0.5'W	08-28-03										**5.25**								
SHA4-0.5'	08-28-03	< 0.75	**2.82**	**173.0**	**0.49**	**0.66**	**20.2**	0.18 J	**12.2**	**29.2**	**47.4**		< 0.25	**15.3**	< 0.75	< 0.25	< 0.75	**40.2**	**119.0**
SHA5-0.5'	08-28-03	< 0.75	< 0.75	**170.0**	**0.57**	**0.58**	**21.4**	0.32 J	**13.8**	**30.2**	**14.5**		0.08 J	**15.8**	< 0.75	< 0.25	**1.71**	**45.6**	**93.1**
SHA6-0.5'	08-28-03	< 0.75	**50.5**	**298.0**	**0.38**	**0.96**	**17.4**	0.18 J	**9.75**	**43.0**	146.0		< 0.25	**13.2**	< 0.75	< 0.25	**2.13**	**32.3**	**302.0**
SHA6-0.5'T	08-28-03										0.04 J								
SHA6-0.5'W	08-28-03		**1.9**								**9.95**								
SHA7-0.5'	08-28-03	< 0.75	**9.28**	**188.0**	**0.48**	**2.44**	**19.2**	0.2 J	**7.84**	**325.0**	**208.0**		**0.35**	**16.8**	< 0.75	0.1 J	< 0.75	**27.2**	**392.0**
SHA7-0.5'T	08-28-03										< 0.1								
SHA7-0.5'W	08-28-03									**1.74**	**5.23**								
SHA8-0.5'	08-28-03	< 0.75	**15.3**	**172.0**	**0.36**	**0.93**	**16.5**	0.23 J	**8.12**	**46.7**	**93.0**		< 0.25	**10.8**	< 0.75	< 0.25	< 0.75	**28.8**	**205.0**

Table 6 - 6010B Soil Quality Summary (mg/kg)
LANCER Site, Los Angeles, California

Sample ID	Date Sample	Sb	As	Ba	Be	Cd	Cr	Cr VI	Co	Cu	Pb	Hg	Mo	Ni	Se	Ag	Th	V	Zn
IND. PRG:		*410*	*1.6*	*67,000*	*1,900*	*450*	*450*	*64*	*1,900*	*41,000*	*750*	*NA*	*5,100*	*NA*	*5,100*	*5,100*	*67*	*7,200*	*100,000*
TTLC:		*500*	*500*	*10,000*	*75*	*100*	*2,500*	*500*	*8,000*	*2,500*	*1,000*	*20*	*3,500*	*2,000*	*100*	*500*	*700*	*2,400*	*5,000*
STLC:		*15.0*	*5.0*	*100*	*0.75*	*1.0*	*5.0*	*5.0*	*80*	*25*	*5.0*	*0.2*	*350*	*20*	*1.0*	*5.0*	*7.0*	*24*	*250*
TCLP:		*NA*	*5.0*	*100*	*NA*	*1.0*	*5.0*	*NA*	*NA*	*NA*	*5.0*	*0.2*	*NA*	*NA*	*1.0*	*5.0*	*NA*	*NA*	*NA*
SHA8-0.5'W	08-28-03										**6.59**								
SHA9-0.5'	08-28-03	**1.9**	**1.15**	**228.0**	**0.26**	**1.89**	**21.3**	0.19 J	**8.95**	**70.3**	**335.0**		0.18 J	**18.4**	< 0.75	< 0.25	**1.53**	**29.5**	**409.0**
SHA9-0.5'T	08-28-03										**0.7**								
SHA9-0.5'W	08-28-03										**25.2**								
SHA10-0.5'	08-28-03	< 0.75	**2.27**	**136.0**	**0.26**	**0.52**	**12.6**	0.29 J	**7.92**	**30.2**	**73.8**		< 0.25	**10.1**	< 0.75	< 0.25	**1.09**	**24.2**	**189.0**
SHA10-0.5'T	08-28-03										0.2								
SHA10-0.5'W	08-28-03										**7.63**								

KEY

Sb - Antimony
As - Arsenic
Ba - Barium
Be - Beryllium
Cd - Cadmium
Cr - Chromium
Cr VI - Hexavalent Chromium
Co - Cobalt
Cu - Copper
Pb - Lead
Hg - Mercury
Mo - Molybdenum
Ni - Nickel
Se - Selenium
Ag - Silver
Th - Thallium
V - Vanadium
Zn - Zinc

NOTES

Blank indicates analysis not performed.
T = TTLC (Total Threshold Limiting Concentration).
W = WET
RA = Sample Reanalyzed
Cr VI Analysis = EPA Method 7199 with Alkaline Digestion
Bold values represent compounds detected above laboratory reporting limit.
IND. PRG = Industrial Soil Preliminary Remedial Goals, EPA Region 9, 2002.
STLC = Soluble Threshold Limiting Concentration.
TCLP = Toxicity Characteristic Leaching Procedure
NA = Not Applicable

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Table 7 - 8081A Soil Quality Summary (ug/kg)
Lancer Site, Los Angeles, California

	Random																			
Analyte:	NHA1-0.5'	NHA2-0.5'	NHA3-0.5'	NHA4-0.5'	NHA5-0.5'	NHA6-0.5'	NHA7-0.5'	NHA8-0.5'	NHA9-0.5'	NHA10-0.5'	SHA1-0.5'	SHA2-0.5'	SHA3-0.5'	SHA4-0.5'	SHA5-0.5'	SHA6-0.5'	SHA7-0.5'	SHA8-0.5'	SHA9-0.5'	SHA10-0.5'
4,4'-DDD	< 5.0	< 5.0	< 5.0	< 5.0	3.7 J	< 5.0	1.7 J	< 5.0	< 5.0	1.4 J	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	1.5 J	3.1 J	2.9 J	**9.2**	**21.0**
4,4'-DDE	< 5.0	**21.0**	< 5.0	< 5.0	4.7 J	1.7 J	< 5.0	< 5.0	< 5.0	**15.0**	**32.0**	< 5.0	< 5.0	3.3 J	1.8 J	**5.2**	**11.0**	**10.0**	**47.0**	**40.0**
4,4'-DDT	< 5.0	**8.9**	< 5.0	< 5.0	3.6 J	< 5.0	1.7 J	< 5.0	< 5.0	**5.6**	**70.0**	**9.5**	< 5.0	**9.9**	**5.0**	**19.0**	**23.0**	**14.0**	**120.0**	**110.0**
Aldrin	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0
Alpha-BHC	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0
Aroclor-1016	< 50.0	< 50.0	< 50.0	< 50.0	< 50.0	< 50.0	< 50.0	< 50.0	< 50.0	< 50.0	< 50.0	< 50.0	< 50.0	< 50.0	< 50.0	< 50.0	< 50.0	< 50.0	< 50.0	< 50.0
Aroclor-1221	< 50.0	< 50.0	< 50.0	< 50.0	< 50.0	< 50.0	< 50.0	< 50.0	< 50.0	< 50.0	< 50.0	< 50.0	< 50.0	< 50.0	< 50.0	< 50.0	< 50.0	< 50.0	< 50.0	< 50.0
Aroclor-1232	< 50.0	< 50.0	< 50.0	< 50.0	< 50.0	< 50.0	< 50.0	< 50.0	< 50.0	< 50.0	< 50.0	< 50.0	< 50.0	< 50.0	< 50.0	< 50.0	< 50.0	< 50.0	< 50.0	< 50.0
Aroclor-1242	< 50.0	< 50.0	< 50.0	< 50.0	< 50.0	< 50.0	< 50.0	< 50.0	< 50.0	< 50.0	< 50.0	< 50.0	< 50.0	< 50.0	< 50.0	< 50.0	< 50.0	< 50.0	< 50.0	< 50.0
Aroclor-1248	< 50.0	< 50.0	< 50.0	< 50.0	< 50.0	< 50.0	< 50.0	< 50.0	< 50.0	< 50.0	< 50.0	< 50.0	< 50.0	< 50.0	< 50.0	< 50.0	< 50.0	< 50.0	< 50.0	< 50.0
Aroclor-1254	< 50.0	< 50.0	< 50.0	< 50.0	< 50.0	< 50.0	< 50.0	< 50.0	< 50.0	< 50.0	< 50.0	< 50.0	< 50.0	< 50.0	< 50.0	< 50.0	**170.0**	< 50.0	**370.0**	< 50.0
Aroclor-1260	< 50.0	< 50.0	< 50.0	< 50.0	< 50.0	< 50.0	< 50.0	< 50.0	< 50.0	< 50.0	< 50.0	< 50.0	< 50.0	< 50.0	< 50.0	< 50.0	< 50.0	< 50.0	< 50.0	< 50.0
Aroclor-1262	< 50.0	< 50.0	< 50.0	< 50.0	< 50.0	< 50.0	< 50.0	< 50.0	< 50.0	< 50.0	< 50.0	< 50.0	< 50.0	< 50.0	< 50.0	< 50.0	< 50.0	< 50.0	< 50.0	< 50.0
Beta-BHC	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0
Chlordane	< 50.0	**58.0**	< 50.0	< 50.0	< 50.0	< 50.0	< 50.0	< 50.0	< 50.0	< 50.0	**200.0**	< 50.0	< 50.0	**74.0**	< 50.0	< 50.0	< 50.0	26.0 J	41.0 J	**71.0**
Delta-BHC	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0
Dieldrin	< 5.0	4.5 J	< 5.0	< 5.0	< 5.0	< 5.0	1.2 J	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0
Endosulfan I	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0
Endosulfan II	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0
Endosulfan Sulfate	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0
Endrin	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0
Endrin Aldehyde	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0
Endrin Ketone	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0
Gamma-BHC	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0

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Table 7 - 8081A Soil Quality Summary (ug/kg)
Lancer Site, Los Angeles, California

	Random																			
Analyte:	NHA1-0.5'	NHA2-0.5'	NHA3-0.5'	NHA4-0.5'	NHA5-0.5'	NHA6-0.5'	NHA7-0.5'	NHA8-0.5'	NHA9-0.5'	NHA10-0.5'	SHA1-0.5'	SHA2-0.5'	SHA3-0.5'	SHA4-0.5'	SHA5-0.5'	SHA6-0.5'	SHA7-0.5'	SHA8-0.5'	SHA9-0.5'	SHA10-0.5'
Heptachlor	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0
Heptachlor Epoxide	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0
Methoxychlor	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0
Toxaphene	< 100.0	< 100.0	< 100.0	< 100.0	< 100.0	< 100.0	< 100.0	< 100.0	< 100.0	< 100.0	< 100.0	< 100.0	< 100.0	< 100.0	< 100.0	< 100.0	< 100.0	< 100.0	< 100.0	< 100.0

IND. PRG (USA Region 9) (ug/kg): 4,4'-DDD (10,000), 4,4'-DDE (7,000), 4,4'- DDT (7,000), Aroclor-1254 (740), Chlordane (6,500), and Dieldrin (110).
TTLC (ug/kg): DDT, DDE, DDD (combined = 1,000), Chlordane (2,500), and PCBs (combined = 50,000).
Bold values represent compounds detected above laboratory reporting limit.

Table 8 - 8151A Soil Quality Summary (ug/kg)
LANCER Site, Los Angeles, California

Sample ID	Date Sampled	2,4,5-T	2,4,5-TP	2,4-D	2,4-DB	2,4-DP	Dalapon	Dicamba	Dinoseb	MCPA	MCPP
North											
NHA1-0.5'	08-28-03	< 10.0	< 10.0	< 100.0	< 100.0	< 100.0	< 250.0	< 10.0	< 50.0	< 10,000.0	< 10,000.0
NHA2-0.5'	08-28-03	< 10.0	< 10.0	< 100.0	< 100.0	< 100.0	< 250.0	< 10.0	< 50.0	< 10,000.0	< 10,000.0
NHA3-0.5'	08-28-03	< 10.0	< 10.0	< 100.0	< 100.0	< 100.0	< 250.0	< 10.0	< 50.0	< 10,000.0	< 10,000.0
NHA4-0.5'	08-28-03	< 10.0	< 10.0	< 100.0	< 100.0	< 100.0	< 250.0	< 10.0	< 50.0	< 10,000.0	< 10,000.0
NHA5-0.5'	08-28-03	< 10.0	< 10.0	< 100.0	< 100.0	< 100.0	< 250.0	< 10.0	< 50.0	< 10,000.0	< 10,000.0
NHA6-0.5'	08-28-03	< 10.0	< 10.0	< 100.0	< 100.0	< 100.0	< 250.0	< 10.0	< 50.0	< 10,000.0	< 10,000.0
NHA7-0.5'	08-28-03	< 10.0	< 10.0	< 100.0	< 100.0	< 100.0	< 250.0	< 10.0	< 50.0	< 10,000.0	< 10,000.0
NHA8-0.5'	08-28-03	< 10.0	< 10.0	< 100.0	< 100.0	< 100.0	< 250.0	< 10.0	< 50.0	< 10,000.0	< 10,000.0
NHA9-0.5'	08-28-03	< 10.0	< 10.0	< 100.0	< 100.0	< 100.0	< 250.0	< 10.0	< 50.0	< 10,000.0	< 10,000.0
NHA10-0.5'	08-28-03	< 10.0	< 10.0	< 100.0	< 100.0	< 100.0	< 250.0	< 10.0	< 50.0	< 10,000.0	< 10,000.0
South											
SHA1-0.5'	08-28-03	< 10.0	< 10.0	< 100.0	< 100.0	< 100.0	< 250.0	< 10.0	< 50.0	< 10,000.0	< 10,000.0
SHA2-0.5'	08-28-03	< 10.0	< 10.0	< 100.0	< 100.0	< 100.0	< 250.0	< 10.0	< 50.0	< 10,000.0	< 10,000.0
SHA3-0.5'	08-28-03	< 10.0	< 10.0	< 100.0	< 100.0	< 100.0	< 250.0	< 10.0	< 50.0	< 10,000.0	< 10,000.0
SHA4-0.5'	08-28-03	< 10.0	< 10.0	< 100.0	< 100.0	< 100.0	< 250.0	< 10.0	< 50.0	< 10,000.0	< 10,000.0
SHA5-0.5'	08-28-03	< 10.0	< 10.0	< 100.0	< 100.0	< 100.0	< 250.0	< 10.0	< 50.0	< 10,000.0	< 10,000.0
SHA6-0.5'	08-28-03	< 10.0	< 10.0	< 100.0	< 100.0	< 100.0	< 250.0	< 10.0	< 50.0	< 10,000.0	< 10,000.0
SHA7-0.5'	08-28-03	< 10.0	< 10.0	< 100.0	< 100.0	< 100.0	< 250.0	< 10.0	< 50.0	< 10,000.0	< 10,000.0
SHA8-0.5'	08-28-03	< 10.0	< 10.0	< 100.0	< 100.0	< 100.0	< 250.0	< 10.0	< 50.0	< 10,000.0	< 10,000.0
SHA9-0.5'	08-28-03	< 10.0	< 10.0	< 100.0	< 100.0	< 100.0	< 250.0	< 10.0	< 50.0	< 10,000.0	< 10,000.0
SHA10-0.5'	08-28-03	< 10.0	< 10.0	< 100.0	< 100.0	< 100.0	< 250.0	< 10.0	< 50.0	< 10,000.0	< 10,000.0

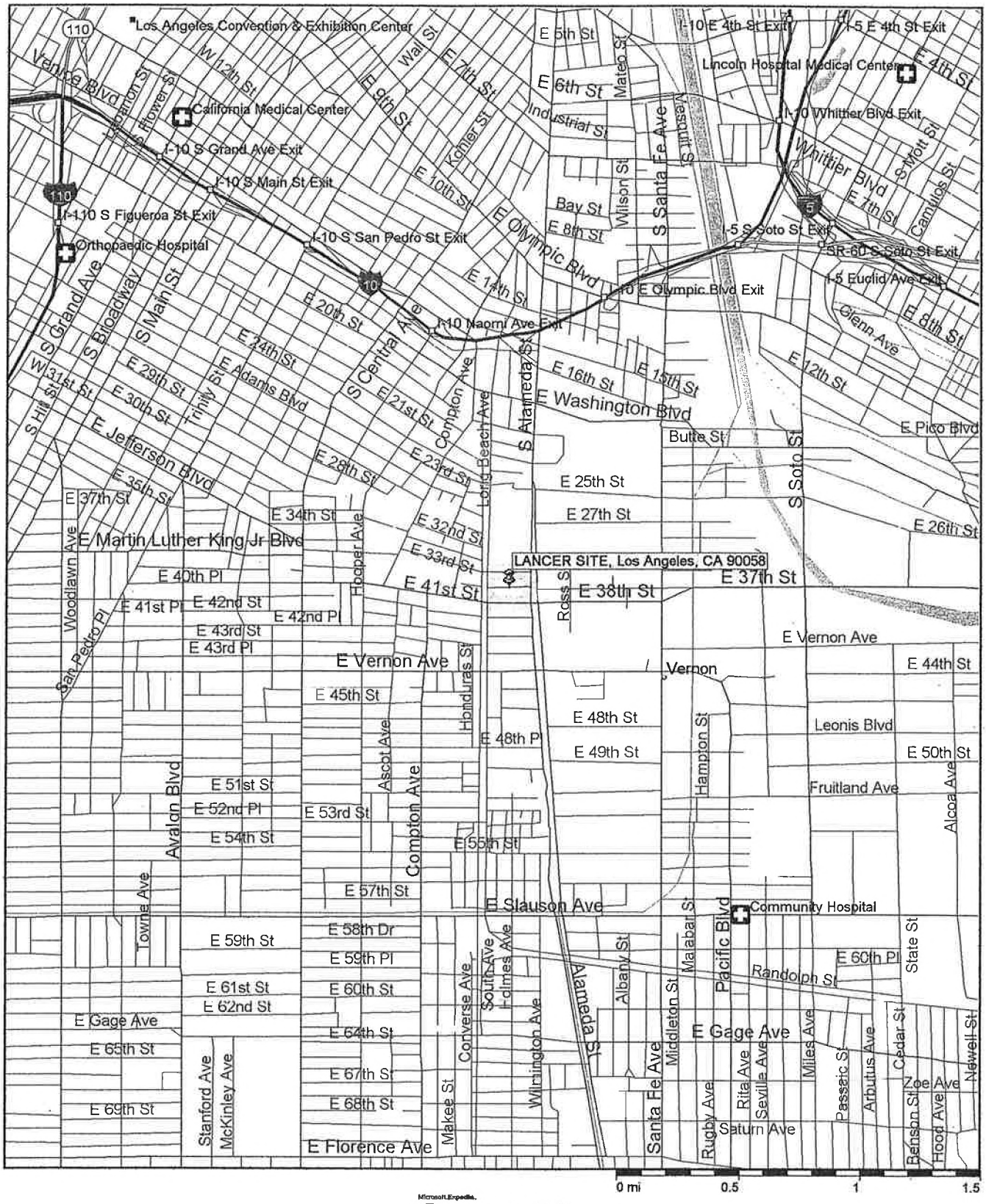
NOTES: *2,4,5-T = (2,4,5-trichlorophenoxy)acetic acid*
2,4,5-TP = 2,4,5-Trichlorophenoxypropionic acid
2,4-D = 2,4-Dichlorophenoxyacetic acid
2,4-DB = 4-(2,4-dichlorophenoxy)butyric acid
2,4-DP =2-(2,4-dichlorophenoxy)propanoic acid
Dalapon = 2,2-Dichloropropanoic acid
Dicamba = 3,6-dichloro-o-anisic acid
Dinoseb = 2-sec-butyl-4,6-dinitrophenol
MCPA = 2-methyl-4-chlorophenoxyacetic acid
MCPP = 2-(2-Methyl-4-chlorophenoxy)propionic acid

FIGURES

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Figure 1
Site Location Map



Microsoft Expedia
Streets98

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Appendix A

ASSESSORS PARCEL MAPS

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View Enlarged Map | View Printing Instructions

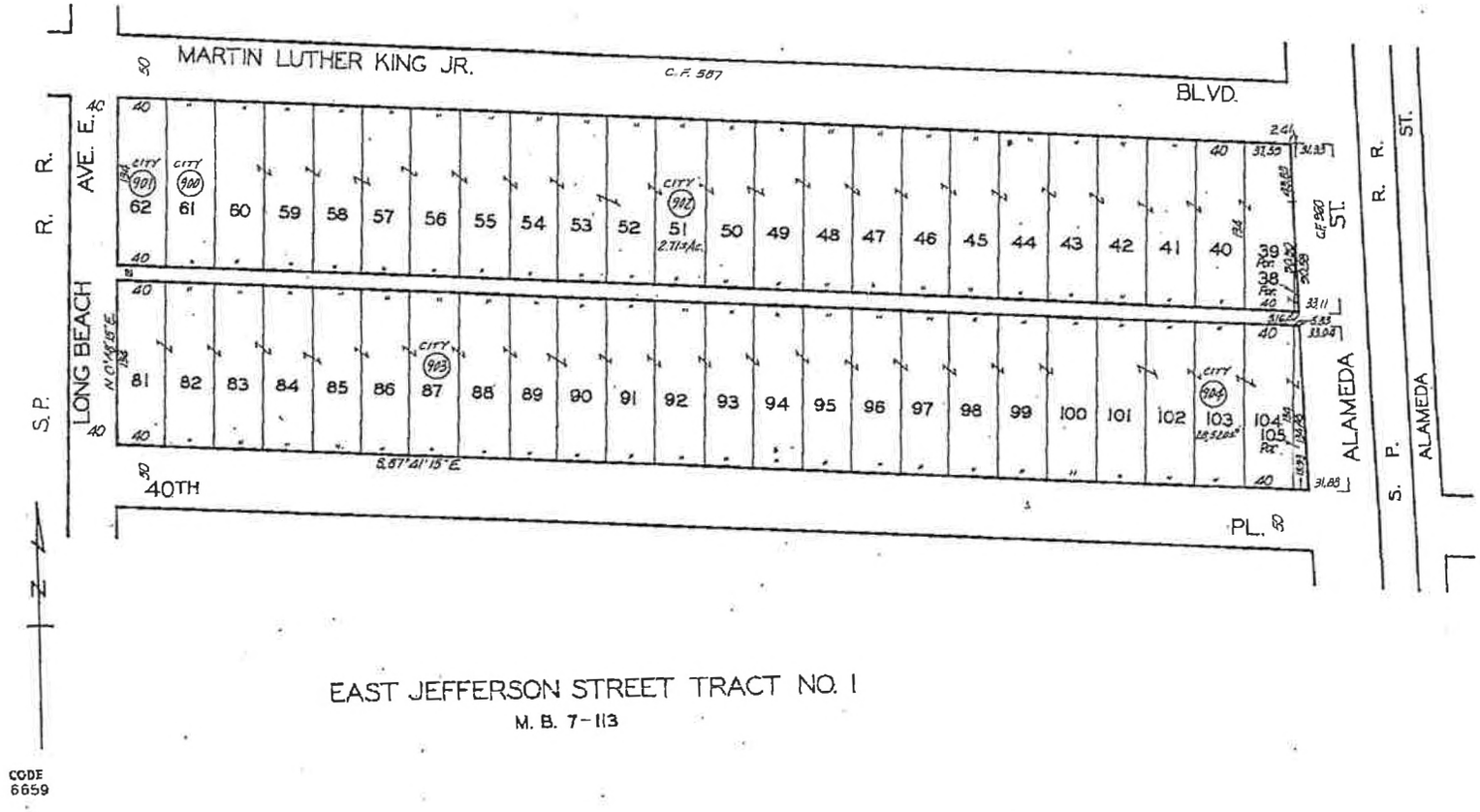
County of Los Angeles: Rick Auerbach, Assessor

5117 | 19

SCALE 1" – 80'

1996

660914
830215
830222
880128CO
960103



EAST JEFFERSON STREET TRACT NO. 1

M. B. 7-113

CODE 6659

FOR PREV. ASSM'T. SEE: 49-40

ASSESSOR'S MAP
COUNTY OF LOS ANGELES, CAL

Assessor Map

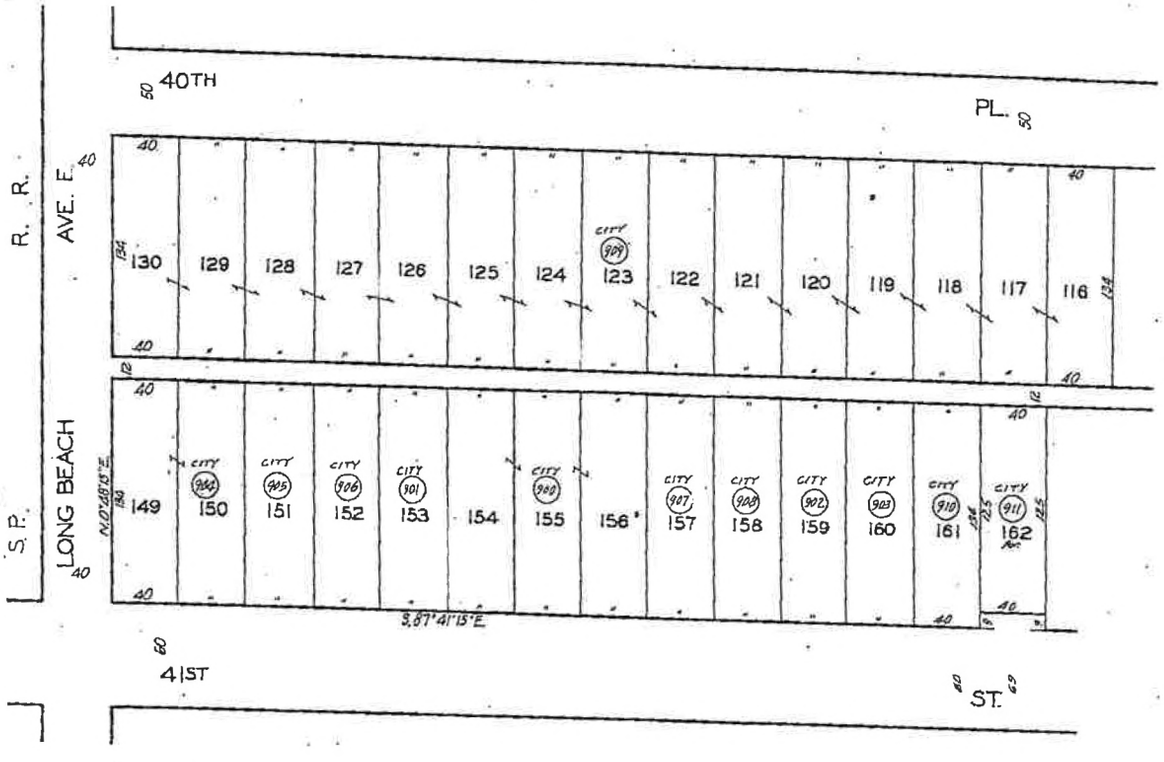
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County of Los Angeles: Rick Auerbach, Assessor

5117 | 20

SCALE 1" — 60'

1996



EAST JEFFERSON STREET TRACT NO. 1

M. B. 7-113

CODE 6659

FOR PREV. ASSM'T. SEE: 49-41, 5117-21

ASSESSOR'S MAP
COUNTY OF LOS ANGELES, CAL.

8/13/03

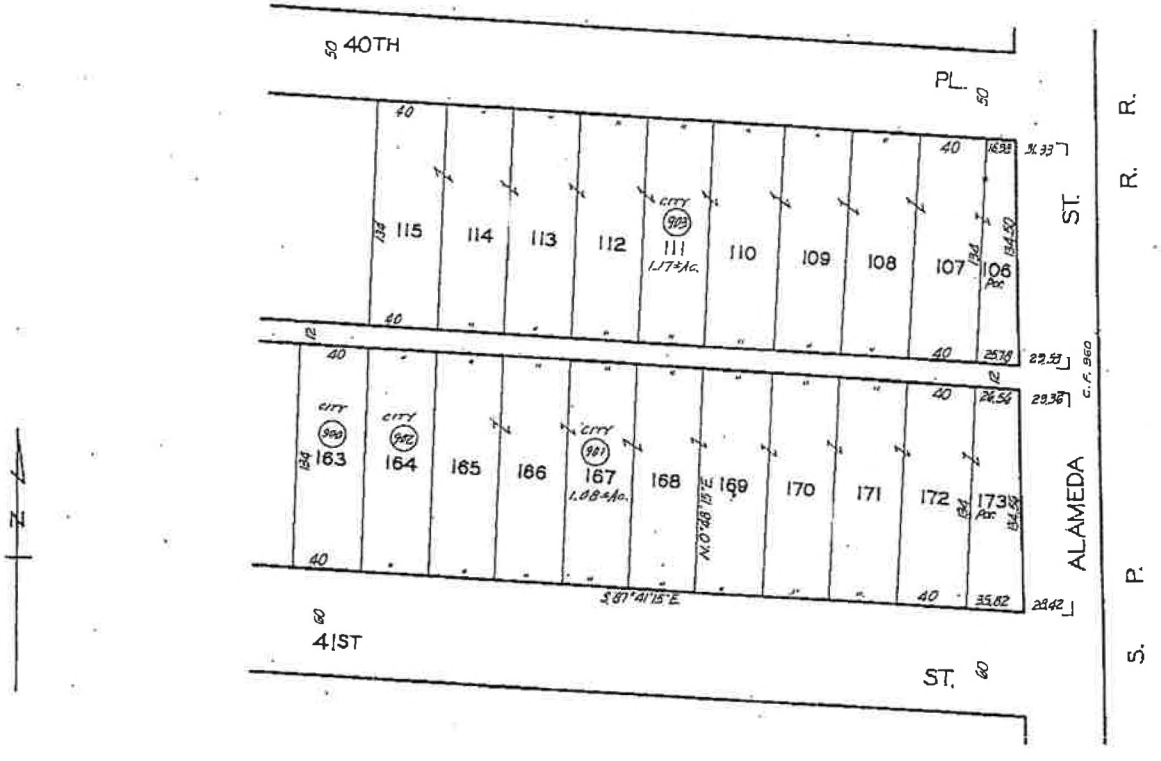
View Enlarged Map | View Printing Instructions

County of Los Angeles: Rick Auerbach, Assessor

5117 | 21

SCALE 1" = 60'

1996



EAST JEFFERSON STREET TRACT NO. 1

M. B. 7-113

CODE
6659

FOR PREV. ASSM'T. SEE: 49-41

ASSESSOR'S MAP
COUNTY OF LOS ANGELES, CAL

Appendix B

Sanborn Maps

DRAFT

(949) 470-1937; (949) 470-0943 (FAX)

Environmental Data Resources, Inc.

"Linking Technology with Tradition"

Sanborn® Map Report

Ship to: Mr. Craig Stolz
Pacific Edge Engineering Inc.
22772 Centre Drive
Lake Forest, CA 92630

Customer Project: NA
7019986NIC 949-470-1937

Order Date: 8/15/2003 **Completion Date:** 8/18/2003 5:14:
Inquiry #: 1031126.1S
P.O. #: NA
Site Name: MLK/E 41st/Longbeach/S Alameda
Address: MLK&E 41ST&LONGBEACH&S ALAMEDA
City/State: Los Angeles, CA 90001
Cross Streets:

Based on client-supplied information, fire insurance maps for the following years were identified

1920 - 2 Maps
1949 - 2 Maps
1953 - 2 Maps
1954 - 2 Maps
1958 - 2 Maps
1960 - 2 Maps
1963 - 2 Maps
1968 - 2 Maps
1970 - 2 Maps

Total Maps: 18

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Electronic Sanborn Map Images
USER'S GUIDE

Thank you for your interest in electronic Sanborn Map images. The following are guidelines for accessing the images and for transferring them to your system. If you have any questions about the use of electronic Sanborn Map images, contact your EDR Account Executive at 1-800-352-0050.

Organization of Electronic Sanborn Image File

- First Page — Sanborn Map Report, listing years of coverage
- Second Page — Electronic Sanborn Map Images USER'S GUIDE
- Third Page — Oldest Sanborn Map Image
- Last Page — Most recent Sanborn Map Image

Navigating the Electronic Sanborn Image File

- Open file on screen.
- Identify TP (Target Property) on the most recent map.
- Find TP on older printed images.
- Using Acrobat, zoom to 250% in order to view more clearly.
  - 200-250% is the approximate equivalent scale of hardcopy Sanborn Maps.
- Zooming in on an image:
  - On the menu bar, click "View" and then zoom.
  - Use the magnifying tool and drag a box around the TP area.

Printing a Sanborn Map from the Electronic File

- EDR recommends printing all images at 300 dpi (300 dpi prints faster than 600 dpi).
- To print only the TP area, cut and paste the area from Adobe Acrobat to your word processor.

Acrobat Version 4



- Go to the Menu bar
- Press and hold the "T" button
- Choose the Graphics Select Tool
- Draw a box around the area selected
- Go to "Menu"
- Highlight "Edit"
- Highlight "Copy"
- Go to a word processor such as Microsoft Word, paste and print.

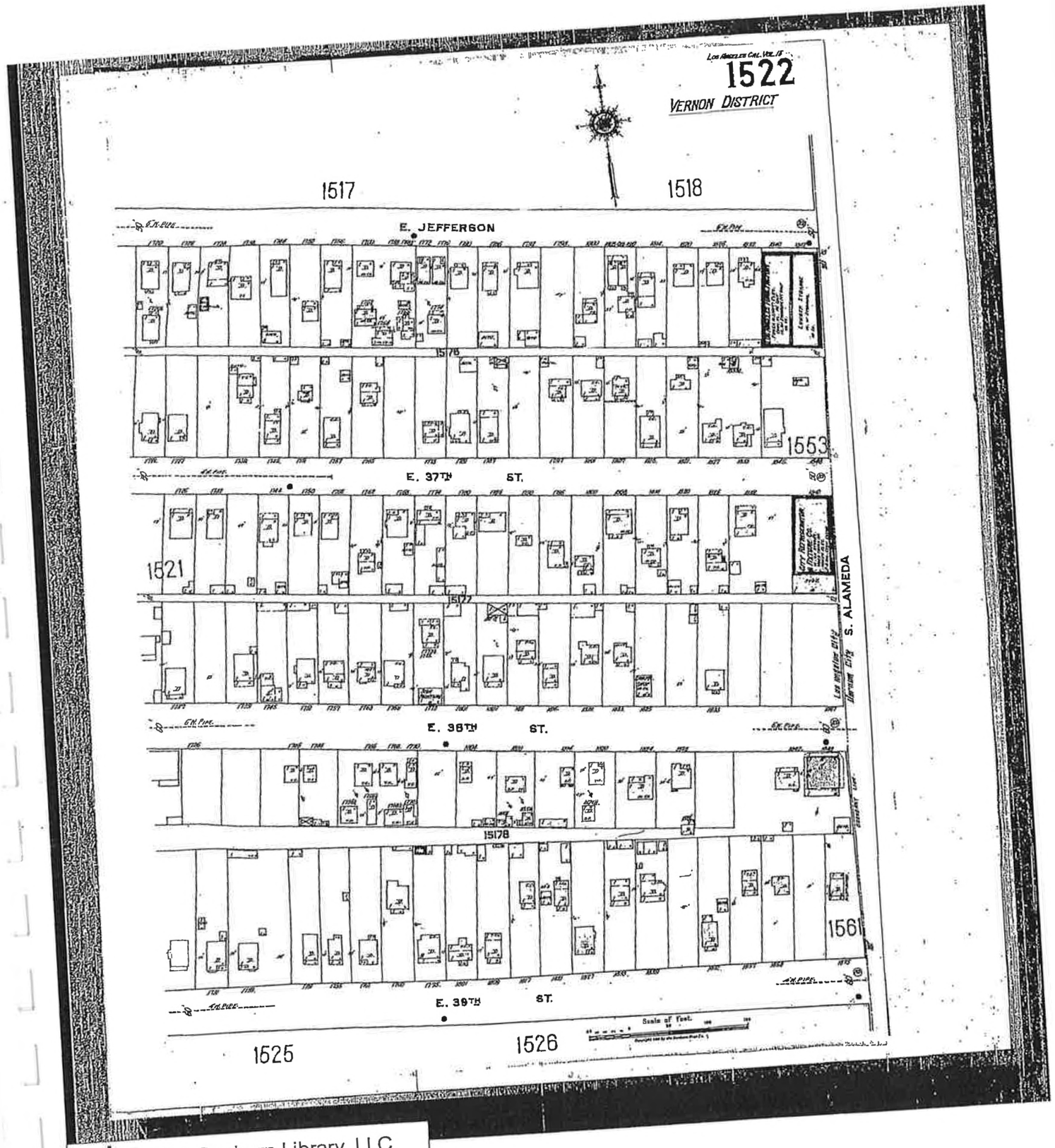
Acrobat Version 5



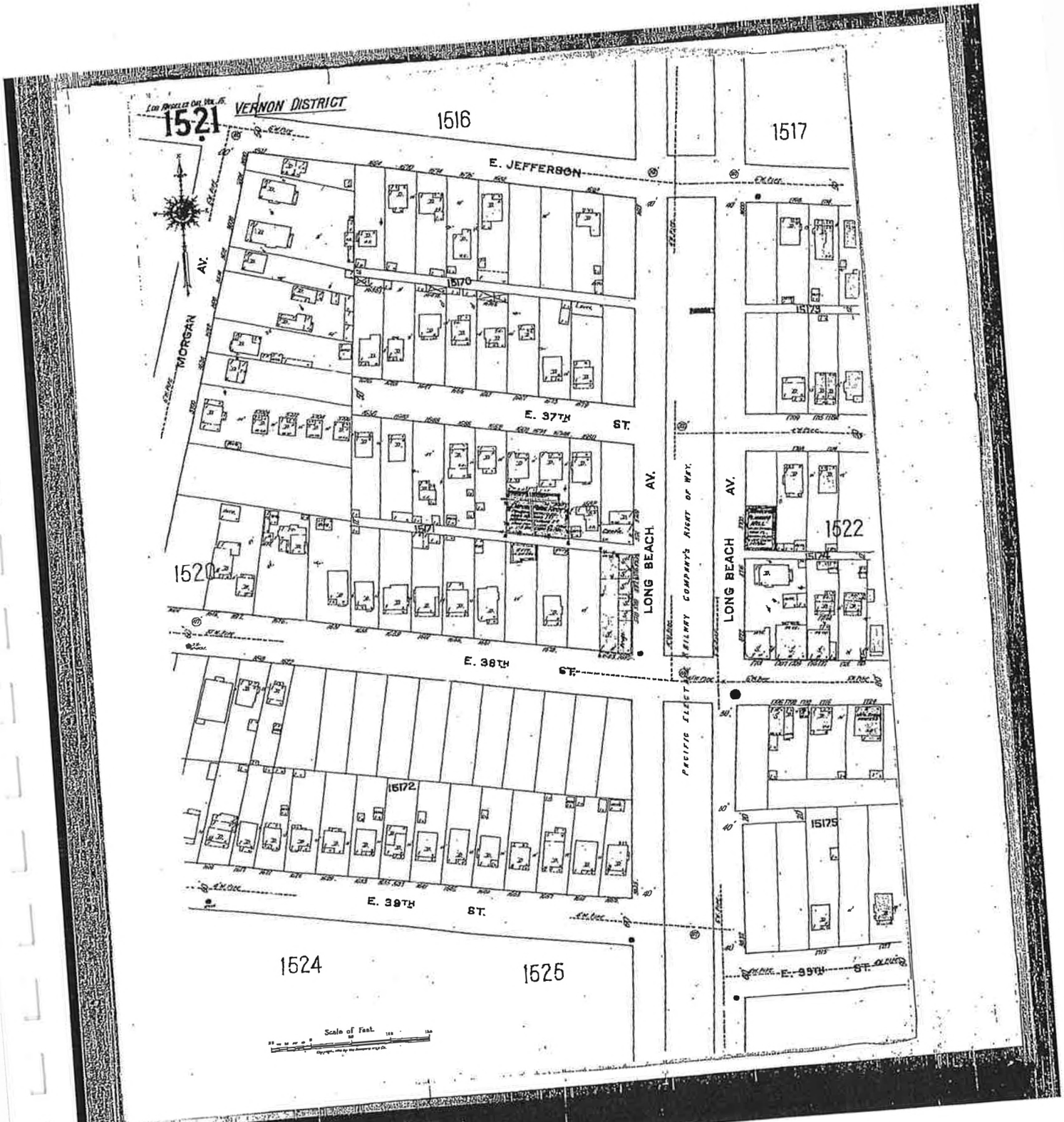
- Go to the Menu Bar.
- Click the "Graphics Select Tool"
- Draw a box around the area selected
- Go to "Menu"
- Highlight "Edit"
- Highlight "Copy"
- Go to a word processor such as Microsoft Word, paste and print.

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- Images are grouped into one file, up to 2MB.
- In cases where in excess of 6-7 map years are available, the file size typically exceeds 2MB. In these cases, you will receive multiple files, labeled as 1 of 3, 2 of 3, etc. including all available map years.
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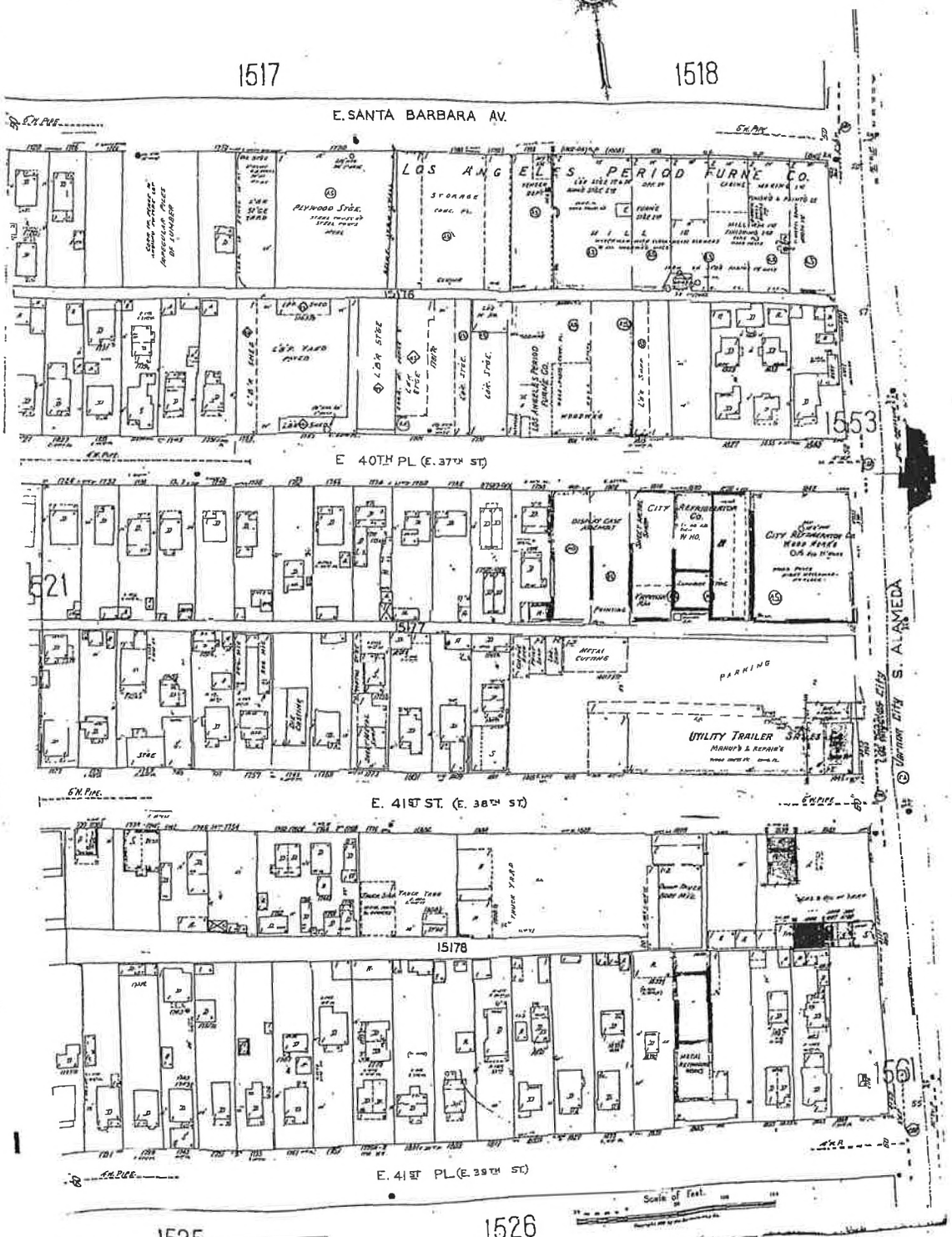
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CAL...034

LOS ANGELES CAL. VOL. 16

1522

VERNON DISTRICT

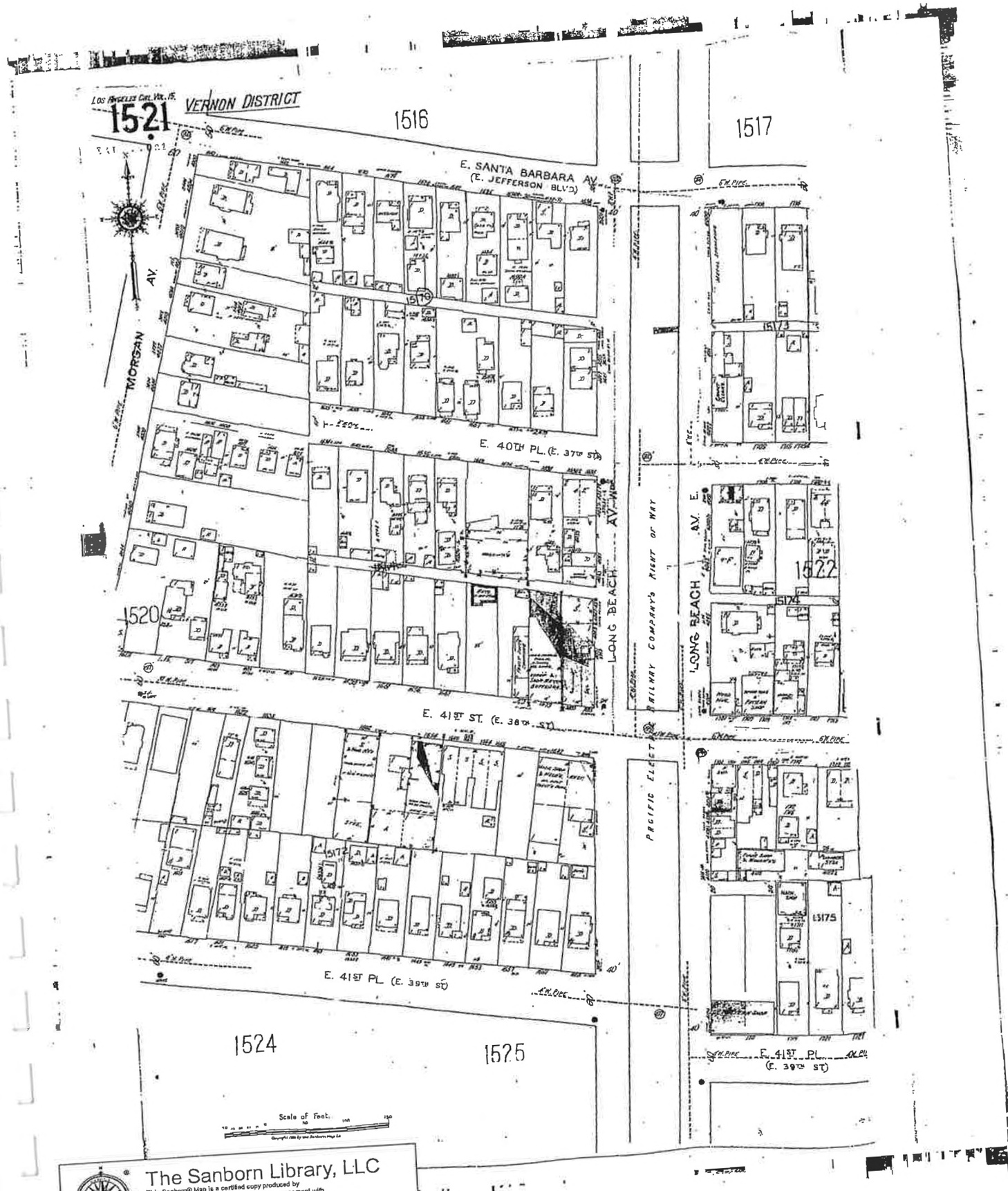


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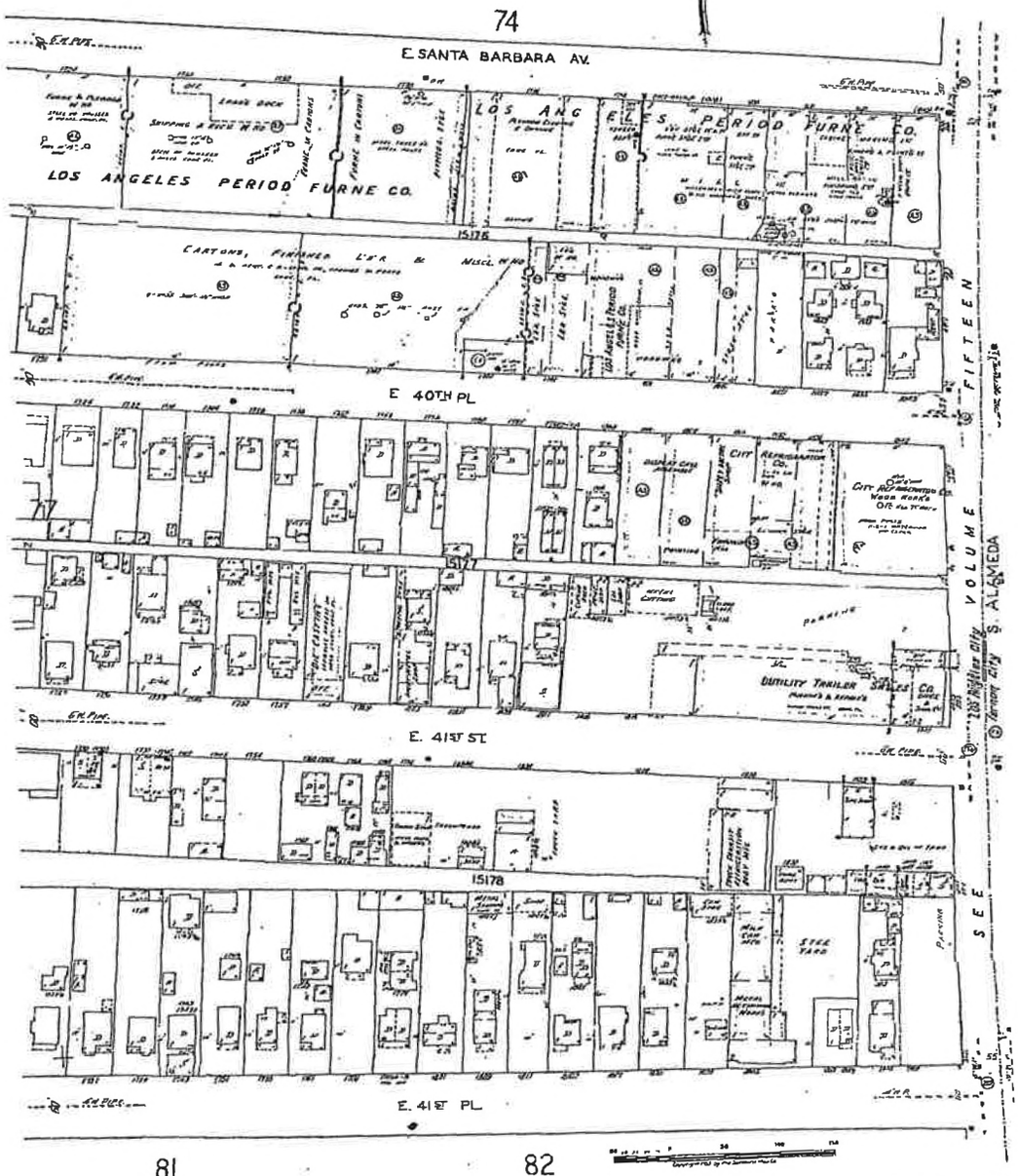


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78A

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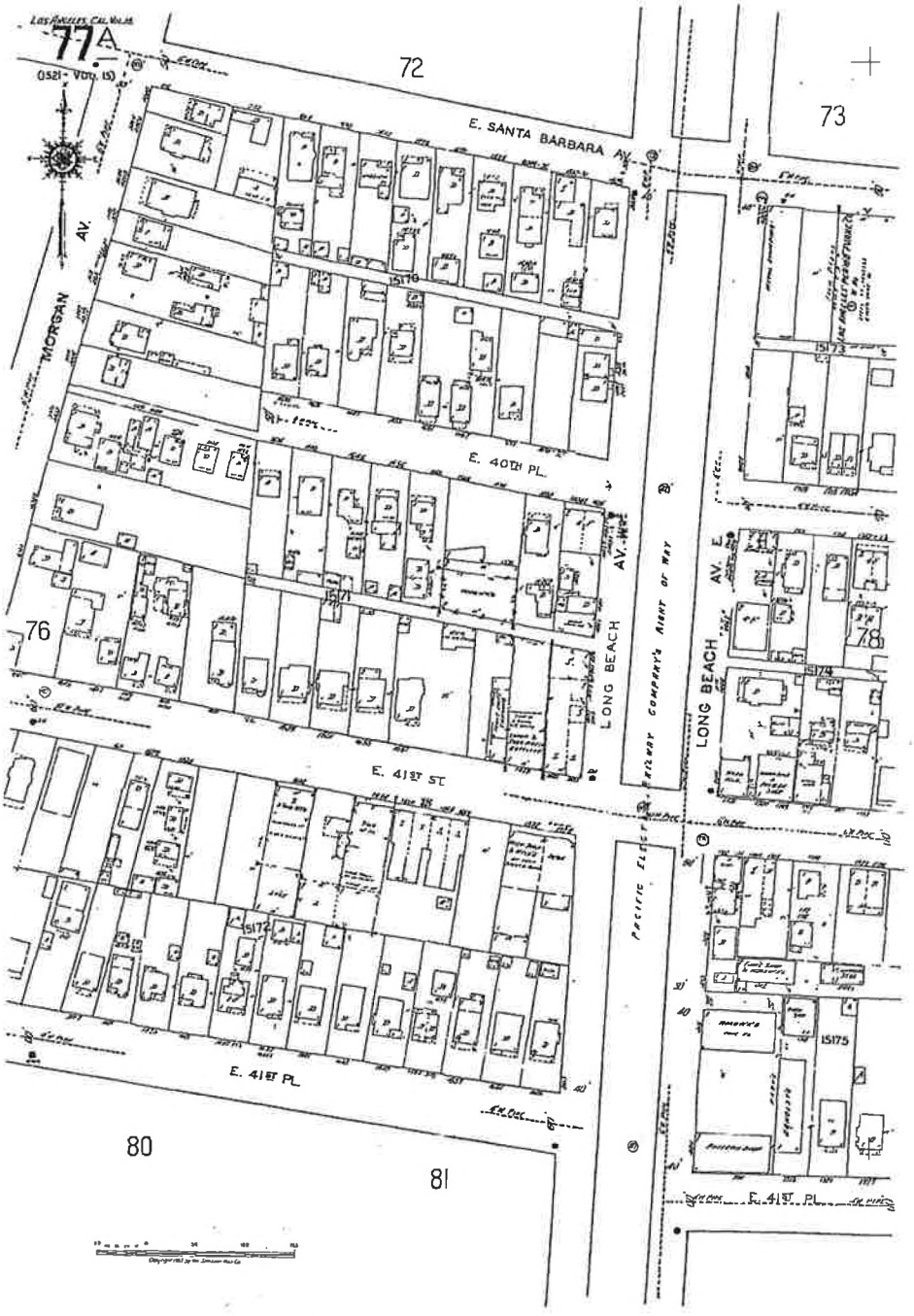


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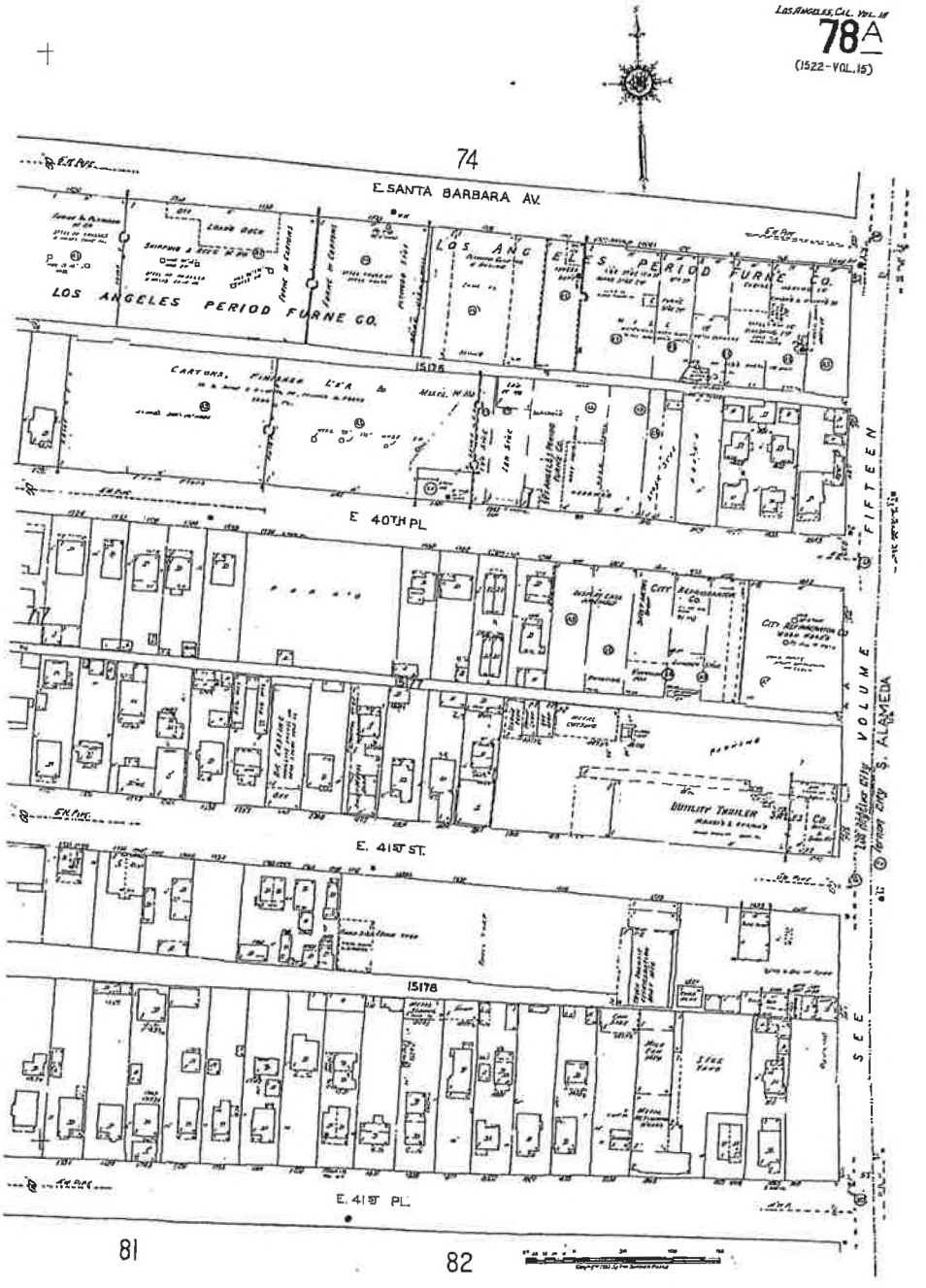
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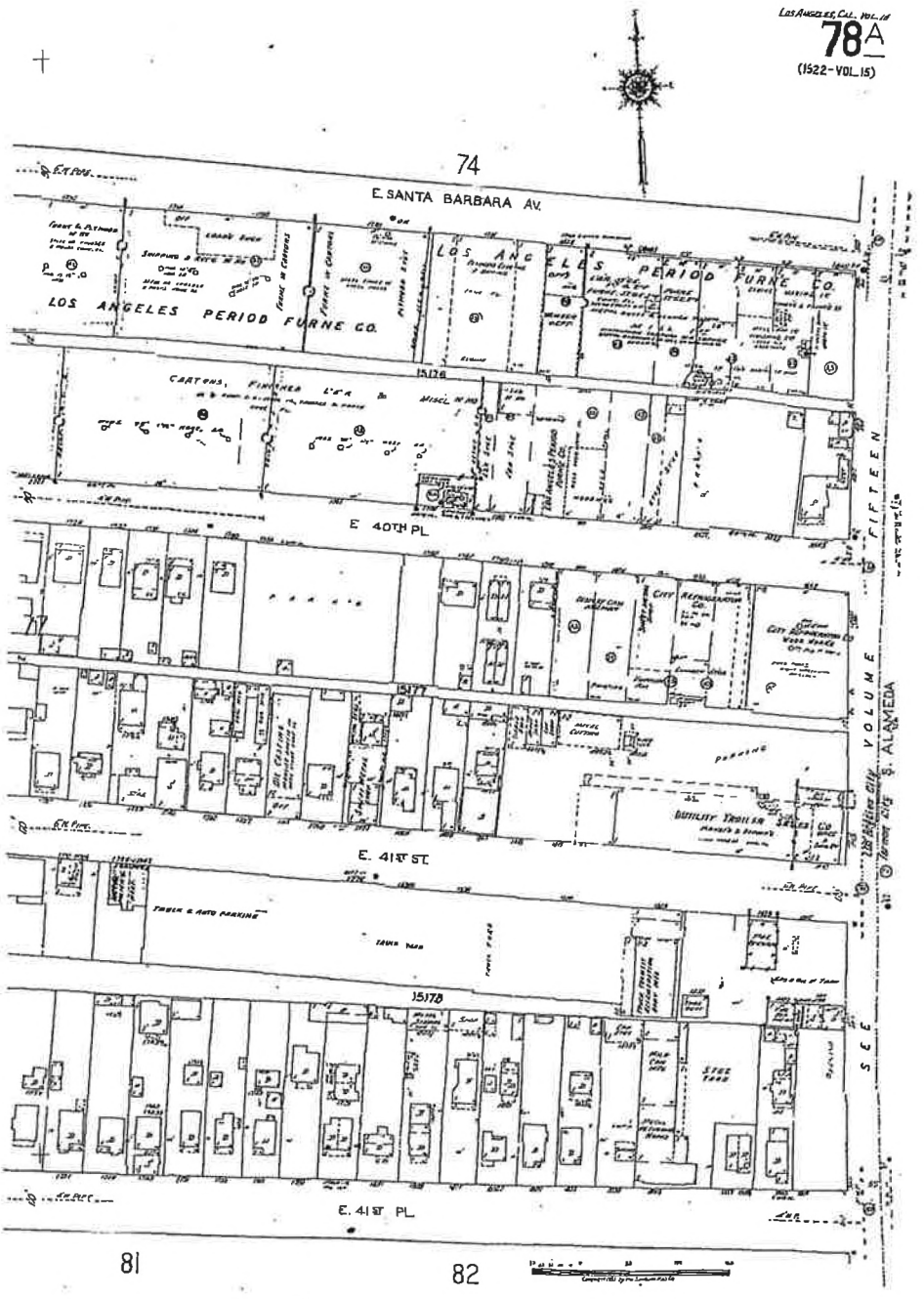
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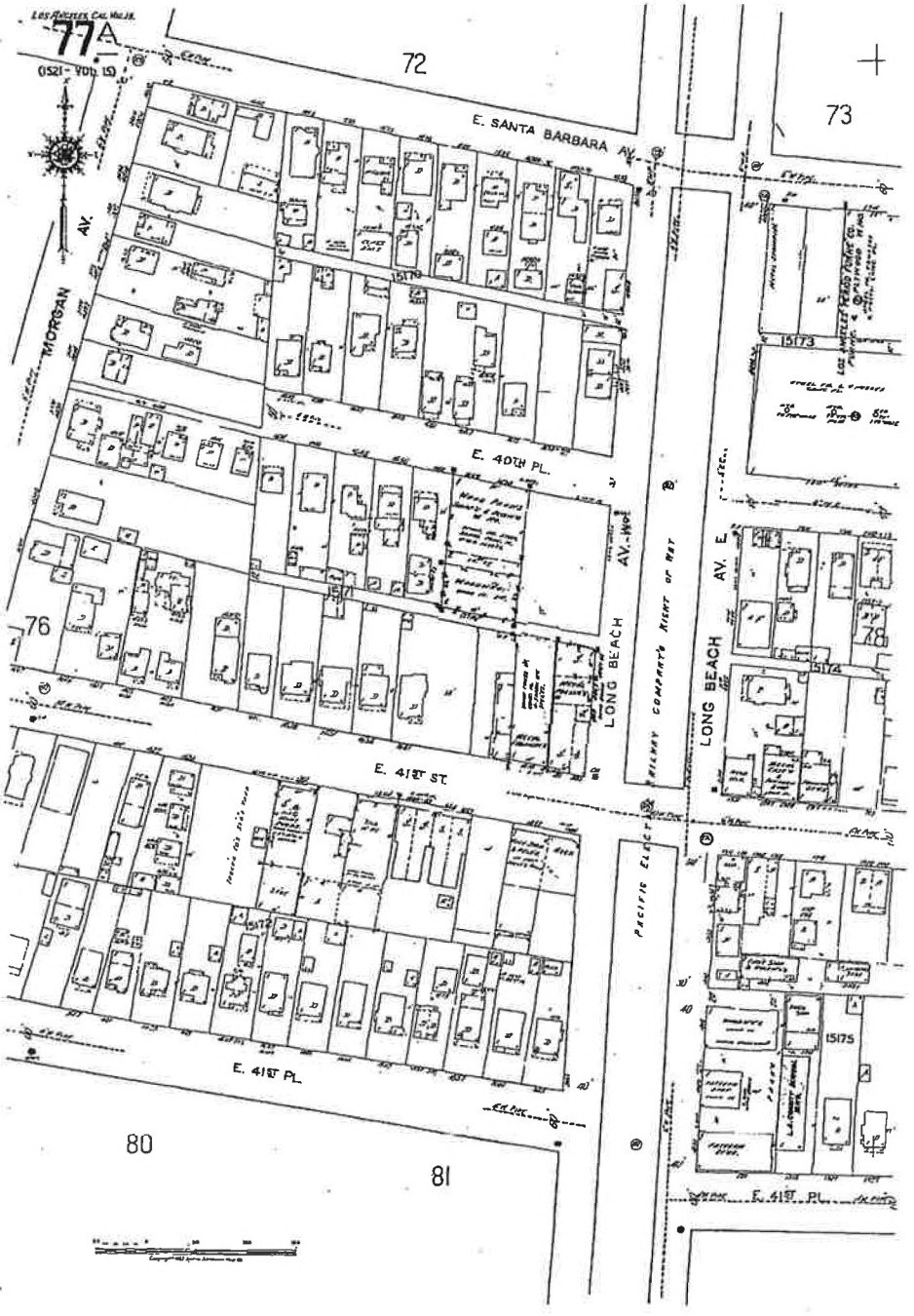
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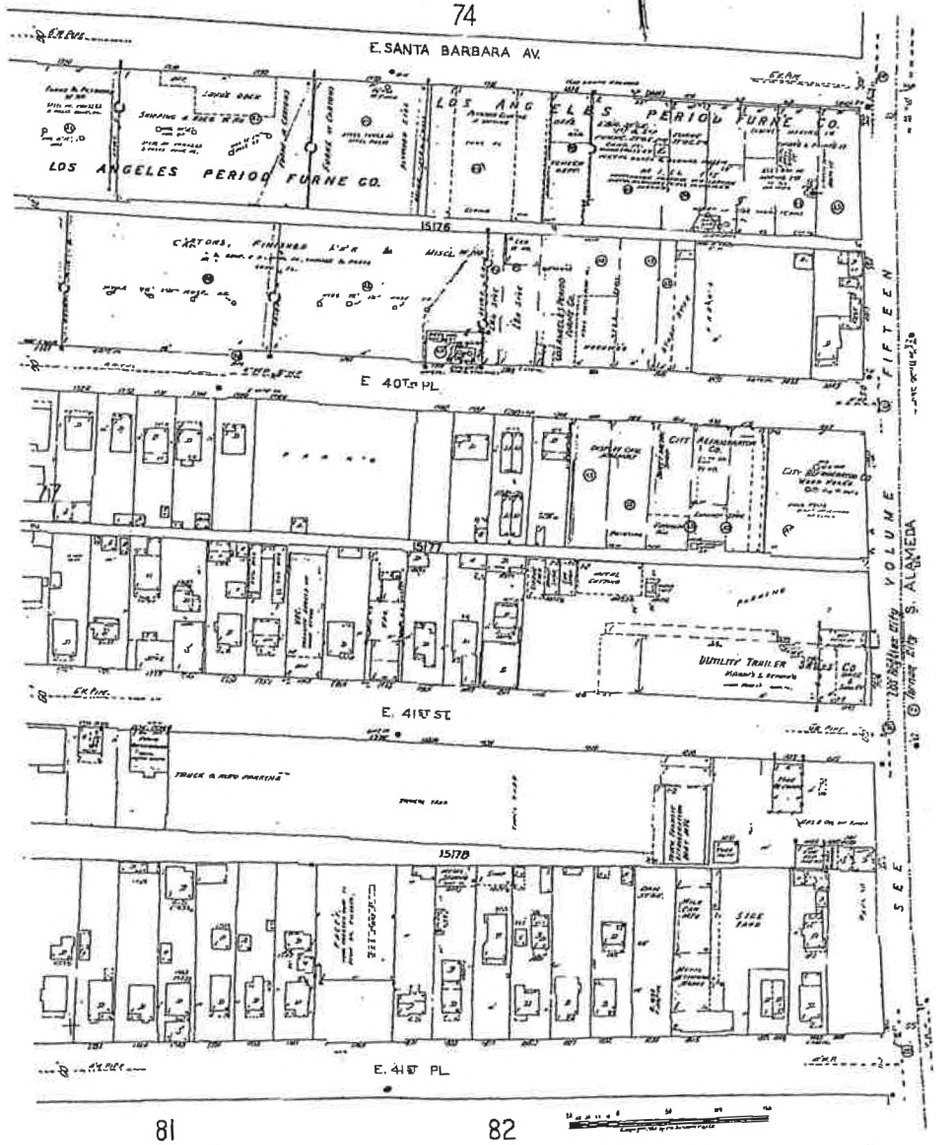


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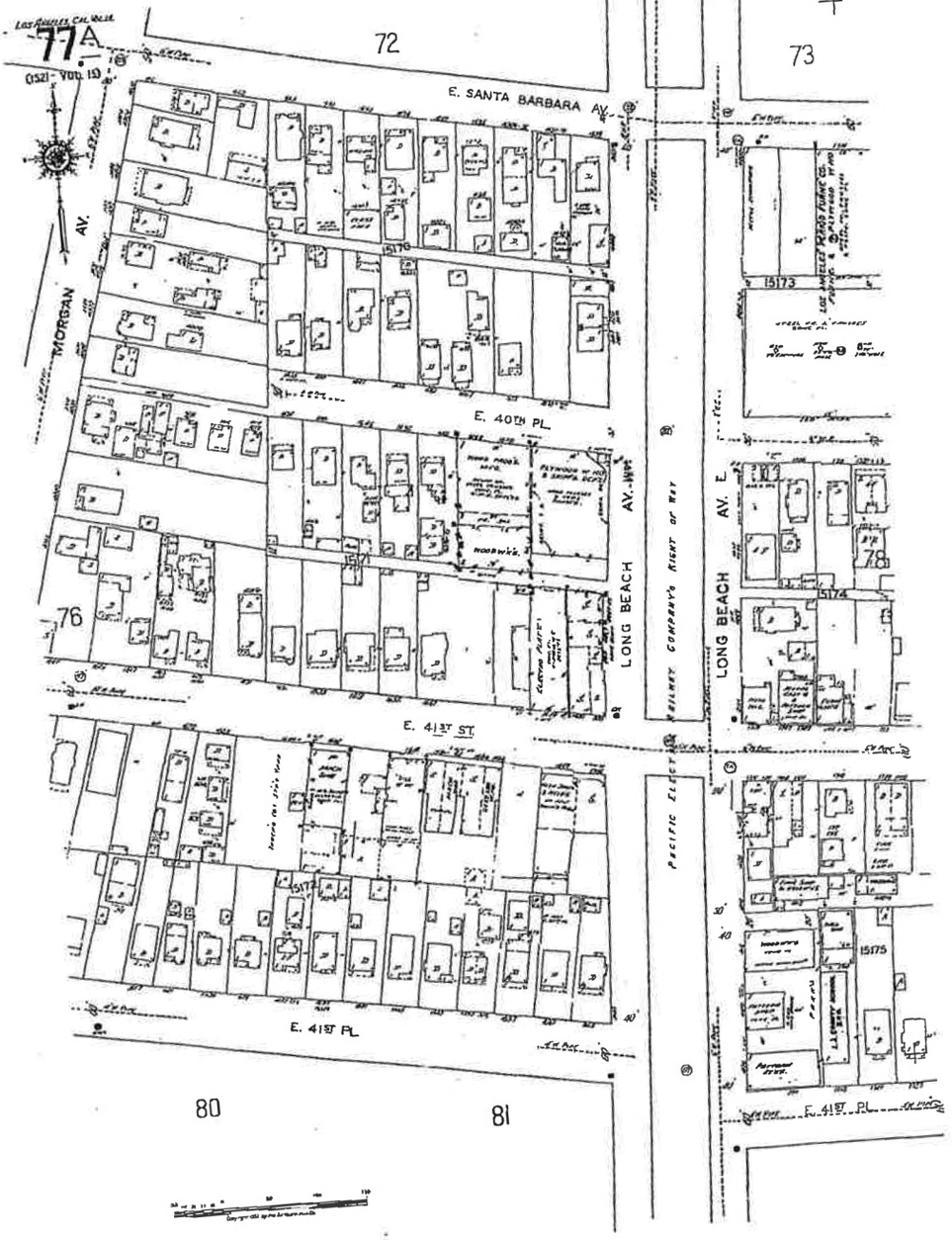
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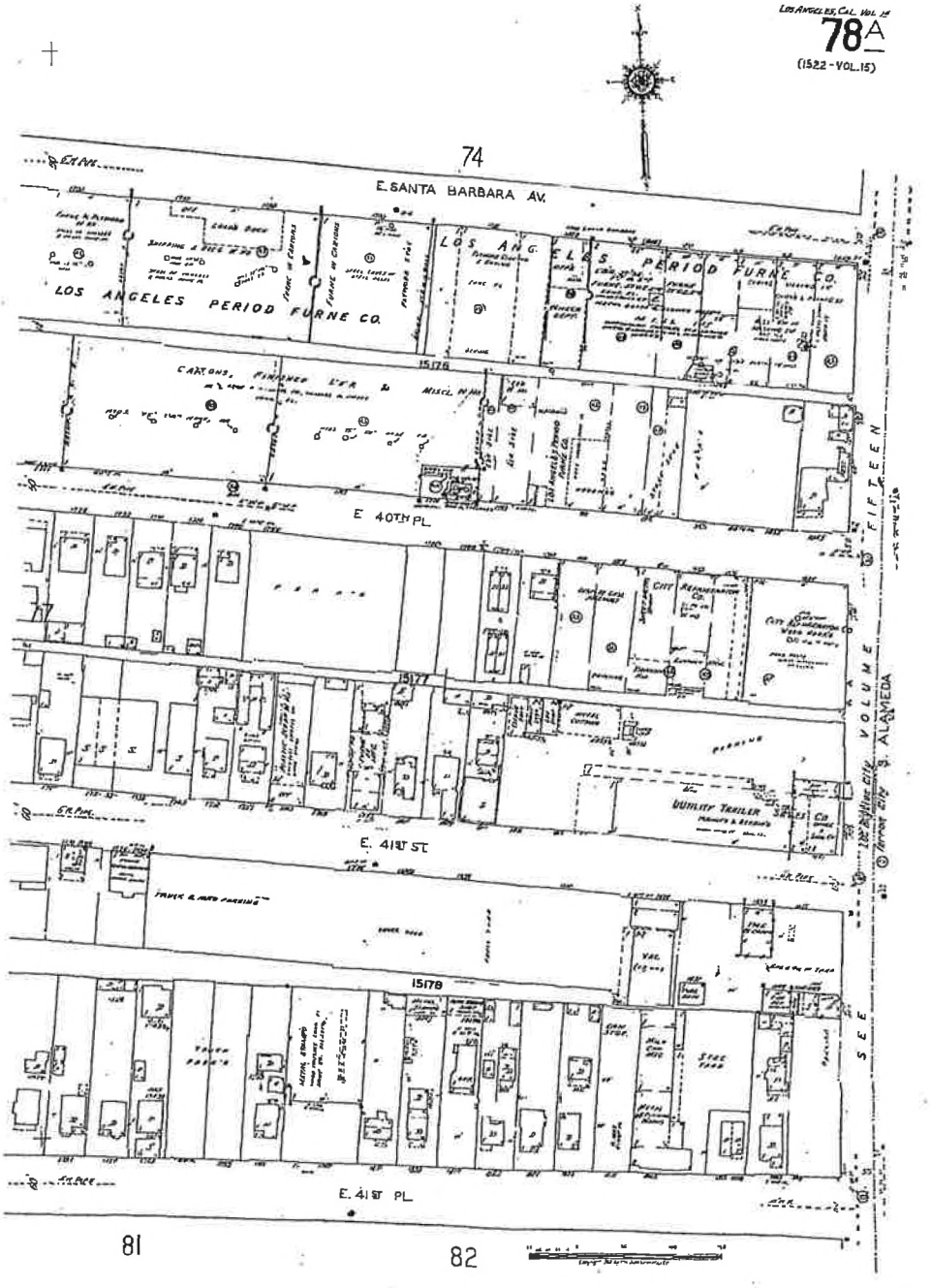
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78A
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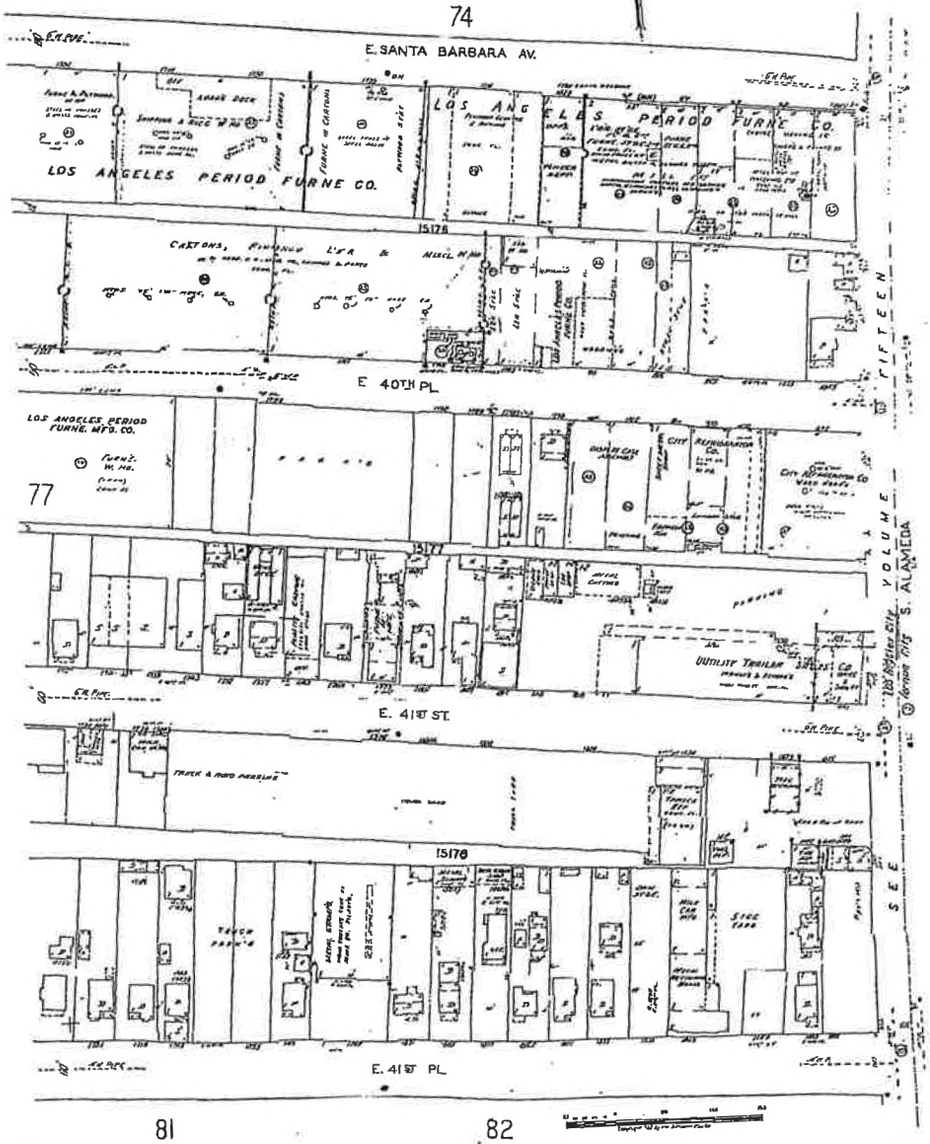


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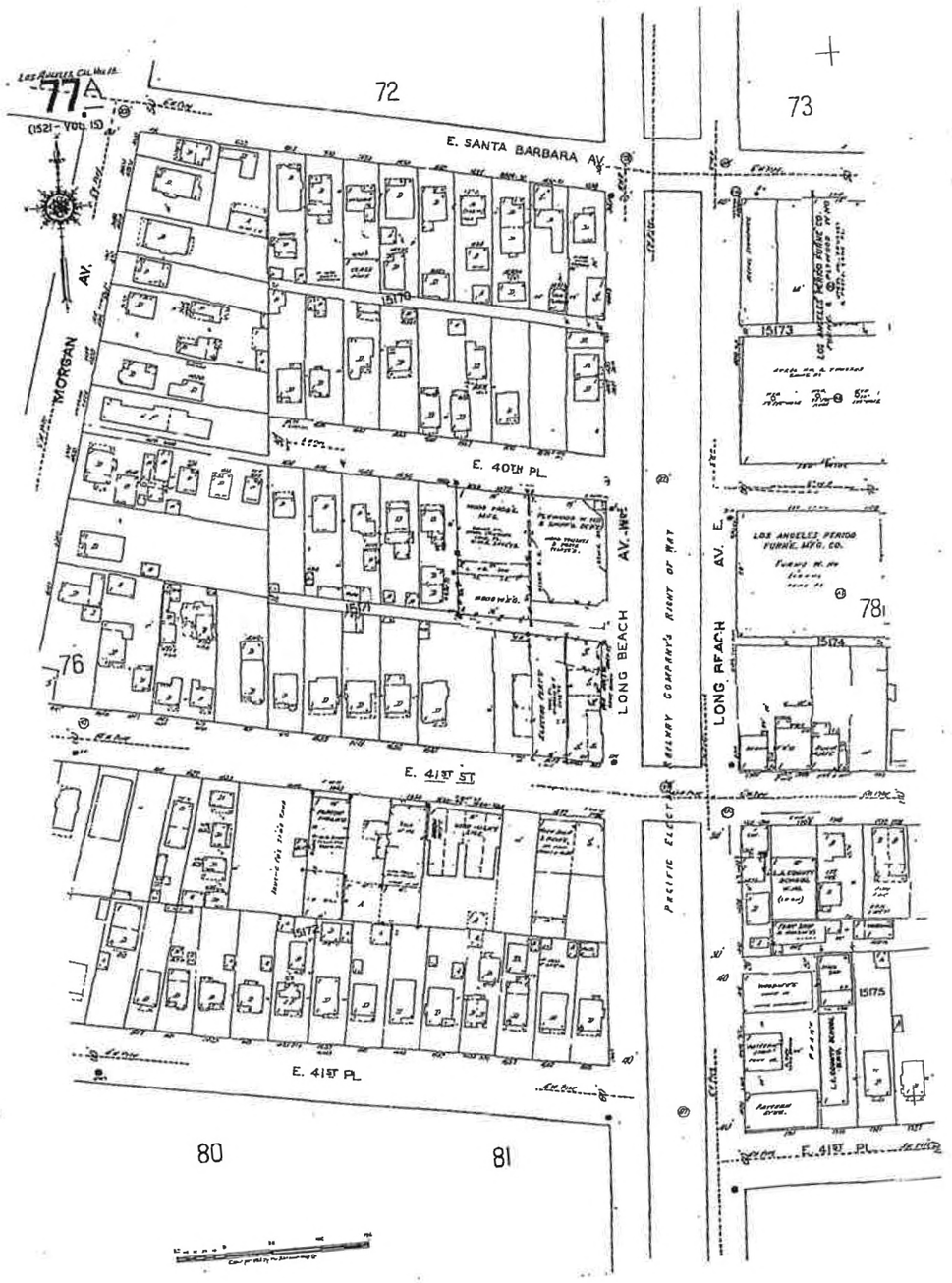
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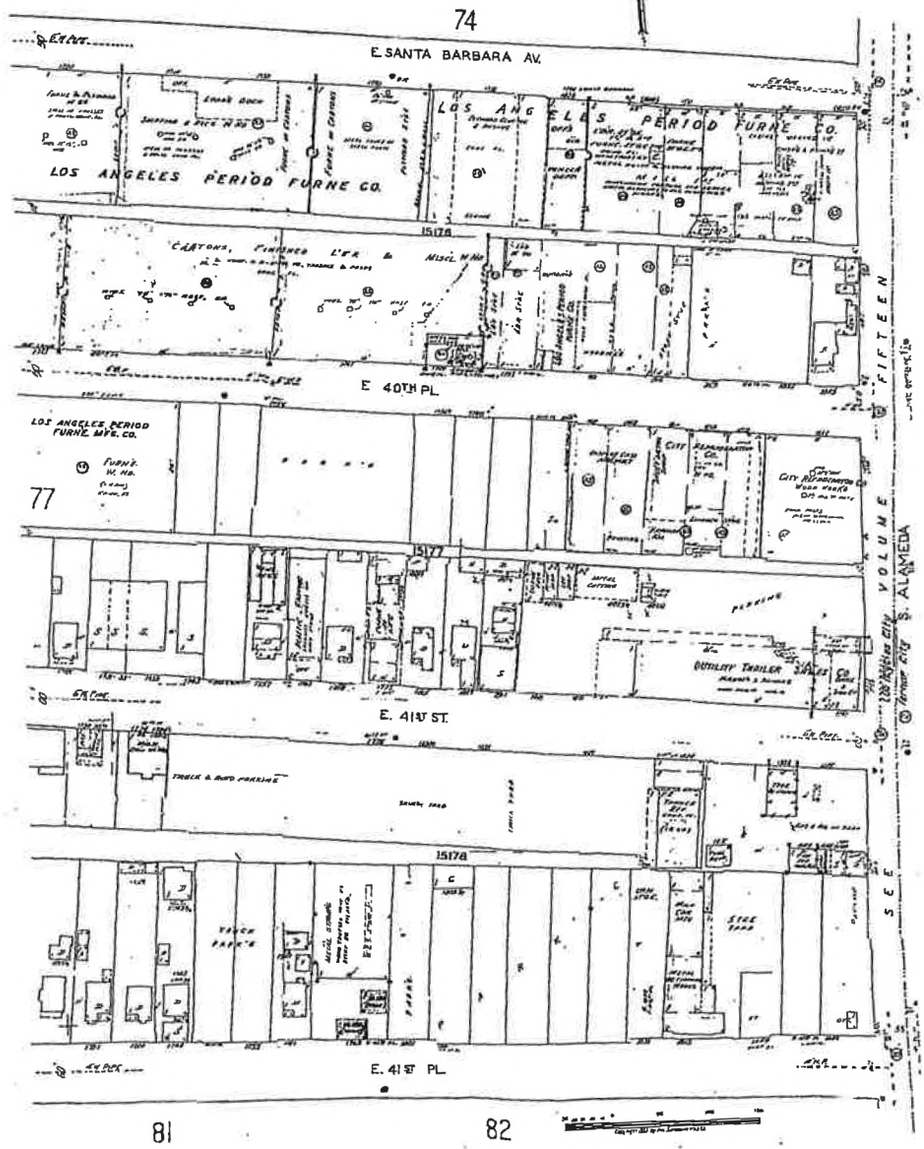


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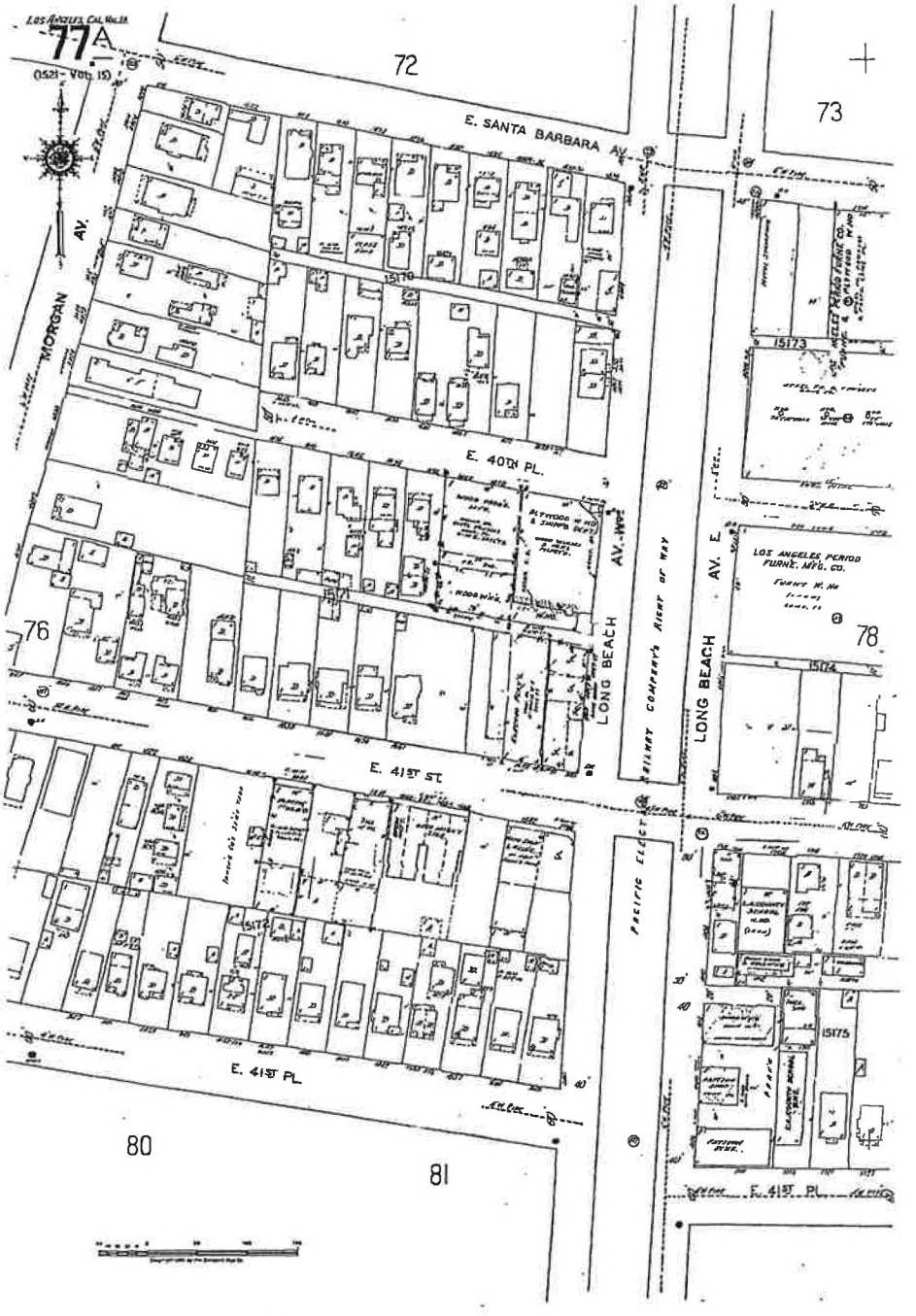


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Appendix C

SOIL LABORATORY REPORTS AND CHAIN OF CUSTODY FORMS

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PRIVILEGED AND CONFIDENTIAL
ATTORNEY-CLIENT PRIVILEGE AND
ATTORNEY WORK PRODUCT DOCTRINE

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DRAFT

PACIFIC EDGE ENGINEERING

(949) 470-1937; (949) 470-0943 (FAX)

Appendix D

SOIL BORING LOGS

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PRIVILEGED AND CONFIDENTIAL
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ATTORNEY WORK PRODUCT DOCTRINE

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Appendix E

EXCERPTS FROM HARTCROWSER'S JANUARY 1995 REPORT

PRELIMINARY HEALTH RISK EVALUATION
LANCER SITE
Los Angeles, California



Prepared for:

Port of Los Angeles
Environmental Management Division
425 S. Palos Verdes Avenue
San Pedro, CA 90733-0151

Prepared by:

Hart Crowser, Inc.
One World Trade Center, Suite 2300
Long Beach, CA 90831-2300

Raymond M. Zeoli, R.E.A.
Senior Project Manager

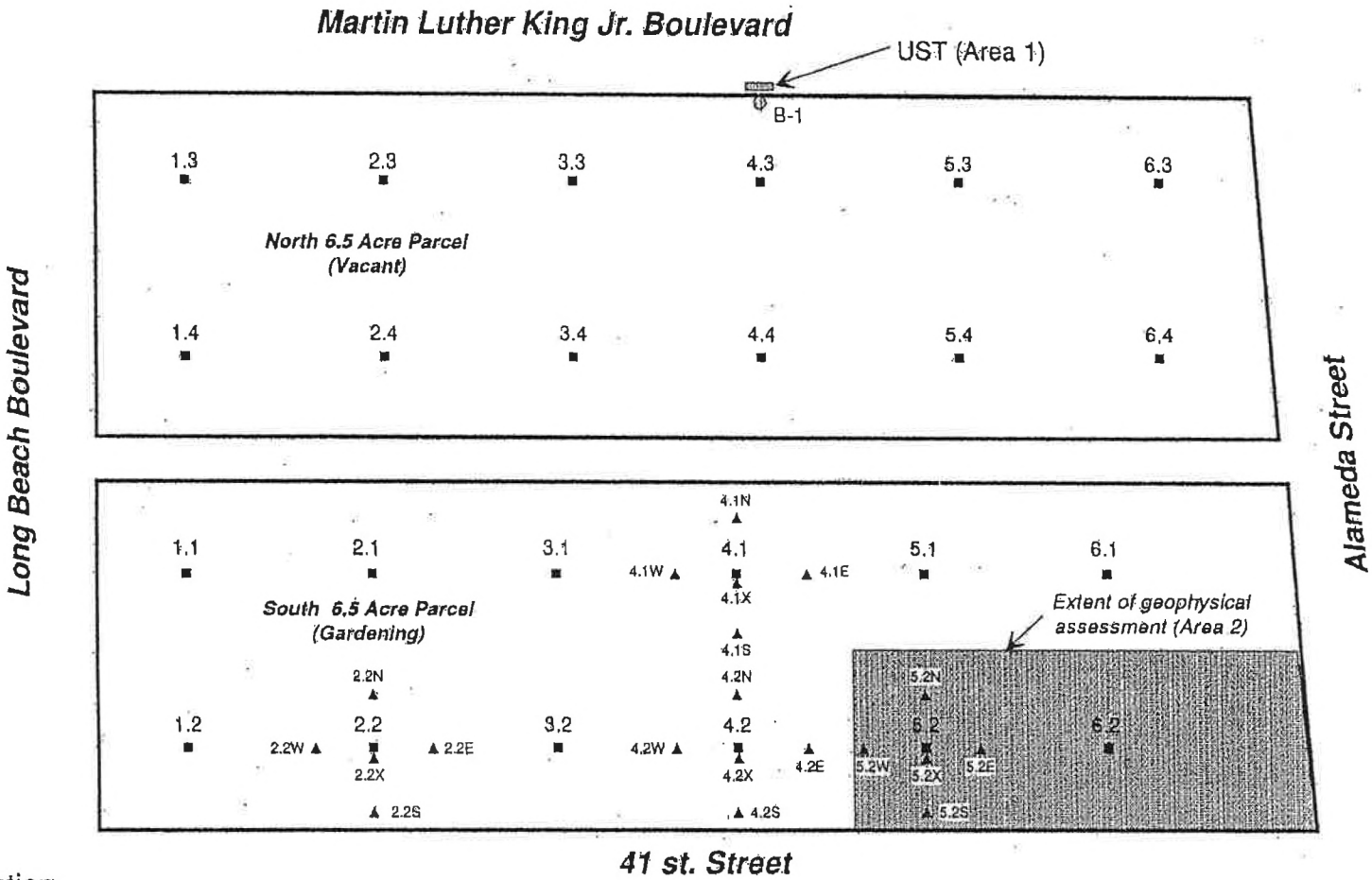
Richard R. Coles, R.E.A.
Vice President

Naomi L. Goodman, MSPH
Associate Environmental Scientist

January 18, 1995
Project No. 6668.02

HARTCROWSER

HARTCROWSER
Earth and Environmental Technologies



Explaination

- ■ 5-Foot Boring
- ▲ Surface Confirmation Sample
- ⊕ 15-Foot soil Boring

0 150 300

Approximate Scale In Feet

N

HARTCROWSER

PROJECT NAME: POLA LANCER

SITE PLAN
6.5 ACRE PARCELS - LANCER

PROJECT NO.: 6668-02 | DATE: JANAURY 1995

FIGURE 2

TABLE 1
Summary of Laboratory Results
South 6.5-Acre Site
Organics

All concentrations in milligrams per kilogram (mg/kg)

Boring	Depth (Feet)	SVOCs (8270)							VOCs (8240)		TRPH (418.1)	TVH (8015M)
		Benzo(b) fluoranthene	Benzo(a) pyrene	Chrysene	Fluoranthene	Phenanthrene	Pyrene	bis(2-ethylhexyl) phthalate	Methylene Chloride	Tetrachloro-ethene		
1.1	0.5	ND	ND	ND	ND	ND	ND	ND	--	--	--	--
1.1	5	--	--	--	--	--	--	--	ND	0.005	ND	ND
2.1	0.5	ND	ND	ND	ND	ND	ND	ND	--	--	--	--
2.1	3	ND	ND	ND	ND	ND	ND	ND	--	--	--	--
2.1	5	--	--	--	--	--	--	--	ND	ND	ND	ND
3.1	0.5	ND	ND	ND	ND	ND	ND	ND	--	--	--	--
3.1	5	--	--	--	--	--	--	--	ND	ND	ND	ND
4.1	0.5	0.88	0.41	0.79	1.00	1.20	1.80	ND	--	--	--	--
4.1	3	ND	ND	ND	ND	ND	ND	ND	--	--	--	--
4.1	5	--	--	--	--	--	--	--	ND	ND	ND	ND
4.1X	0.5	ND	ND	ND	ND	ND	ND	ND	--	--	--	--
4.1N	0.5	ND	ND	ND	ND	ND	ND	ND	--	--	--	--
4.1S	0.5	ND	ND	ND	ND	ND	ND	ND	--	--	--	--
4.1E	0.5	ND	ND	ND	ND	ND	ND	ND	--	--	--	--
4.1W	0.5	ND	ND	ND	ND	ND	ND	ND	--	--	--	--
5.1	0.5	ND	ND	ND	ND	ND	ND	ND	--	--	--	--
5.1	5	--	--	--	--	--	--	--	ND	ND	ND	ND
6.1	0.5	ND	ND	ND	ND	ND	ND	ND	--	--	--	--
6.1	3	ND	ND	ND	ND	ND	ND	ND	--	--	--	--
6.1	5	--	--	--	--	--	--	--	ND	ND	110	ND
1.2	0.5	ND	ND	ND	ND	ND	ND	ND	--	--	--	--
1.2	5	--	--	--	--	--	--	--	ND	0.009	14	ND
2.2	0.5	ND	ND	ND	ND	ND	ND	ND	--	--	--	--
2.2	3	ND	ND	ND	ND	ND	ND	ND	--	--	--	--
2.2	5	--	--	--	--	--	--	--	ND	ND	ND	ND
3.2	0.5	ND	ND	ND	ND	ND	ND	ND	--	--	--	--
3.2	5	--	--	--	--	--	--	--	ND	ND	ND	ND
4.2	0.5	ND	ND	ND	ND	ND	ND	1.50	--	--	--	--
4.2	3	ND	ND	ND	ND	ND	ND	ND	--	--	--	--
4.2	5	--	--	--	--	--	--	--	ND	ND	ND	ND
4.2X	0.5	ND	ND	ND	ND	ND	ND	ND	--	--	--	--
4.2N	0.5	ND	ND	ND	ND	ND	ND	ND	--	--	--	--
4.2S	0.5	ND	ND	ND	ND	ND	ND	ND	--	--	--	--
4.2E	0.5	ND	ND	ND	ND	ND	ND	ND	--	--	--	--
4.2W	0.5	ND	ND	ND	ND	ND	ND	ND	--	--	--	--
5.2	0.5	ND	ND	ND	ND	ND	ND	ND	--	--	--	--
5.2	5	--	--	--	--	--	--	--	.008	ND	ND	ND
6.2	0.5	ND	ND	ND	ND	ND	ND	ND	--	--	--	--
6.2	3	ND	ND	ND	ND	ND	ND	ND	--	--	--	--
6.2	5	--	--	--	--	--	--	--	ND	ND	ND	ND

(1) Only those SVOCs and VOCs that were detected in any of the samples are included in the table.
(2) SVOCs = Semivolatile Organic Compounds using USEPA method 8270
(3) VOCs = Volatile Organic Compounds using USEPA method 8240
(4) TRPH = Total Recoverable Petroleum Hydrocarbons using USEPA method 418.1
(5) TVH = Total Volatile Hydrocarbons using USEPA method 8015 modified
(6) ND = Not detected
(7) -- = Not Tested

TABLE 2
Summary of Laboratory Results
South 6.5-Acre Site
Metals

All concentrations in milligrams per kilogram (mg/kg)

Boring	Depth (ft)	Total Metals (6010/7000)																		WET Metals	
		Sb	As	Ba	Be	Cd	Cr	Cr6	Co	Cu	Pb	Hg	Mo	Ni	Se	Ag	Tl	V	Zn	Pb	Hg
1.1	0.5	ND	2.2	110	ND	ND	17	ND	8.8	21	31	ND	ND	13	ND	ND	ND	32	87	--	--
2.1	0.5	ND	2.9	96	ND	ND	12	ND	7.7	23	30	2.1	ND	9.2	ND	ND	ND	26	82	--	--
2.1	3	ND	2.1	160	0.49	ND	22	--	13	23	4.6	ND	ND	15	ND	ND	ND	49	62	--	--
3.1	0.5	ND	4.8	82	0.49	ND	13	ND	10	12	10	ND	ND	11	ND	ND	ND	35	26	--	--
4.1	0.5	ND	2.9	240	0.46	ND	22	ND	12	54	74	0.6	ND	16	ND	ND	ND	46	230	--	--
4.1	3	ND	ND	130	0.43	ND	19	--	11	20	9.6	0.7	ND	14	ND	ND	ND	46	56	--	--
5.1	0.5	ND	4.9	210	0.5	1.1	22	ND	12	41	120	ND	ND	17	ND	ND	ND	43	250	--	--
6.1	0.5	ND	7.9	180	0.44	ND	23	ND	10	27	66	ND	ND	18	ND	ND	ND	38	130	--	--
6.1	3	ND	ND	69	ND	ND	12	--	7.5	12	7.2	ND	ND	7.4	ND	ND	ND	32	43	--	--
1.2	0.5	ND	6.7	150	ND	1.7	17	ND	5.8	200	130	ND	ND	17	ND	ND	ND	21	280	--	--
2.2	0.5	2.3	7.1	260	0.55	3.6	32	ND	12	180	310	ND	ND	23	ND	ND	ND	45	530	13	ND
2.2	3	ND	ND	140	0.43	ND	21	--	12	24	10	ND	ND	14	ND	ND	ND	44	64	--	--
2.2X	0.5	--	--	--	--	--	--	--	--	--	108	--	--	--	--	--	--	--	--	--	--
2.2N	0.5	--	--	--	--	--	--	--	--	--	188	--	--	--	--	--	--	--	--	--	--
2.2S	0.5	--	--	--	--	--	--	--	--	--	100	--	--	--	--	--	--	--	--	--	--
2.2E	0.5	--	--	--	--	--	--	--	--	--	230	--	--	--	--	--	--	--	--	--	--
2.2W	0.5	--	--	--	--	--	--	--	--	--	338	--	--	--	--	--	--	--	--	--	--
3.2	0.5	5.3	4.8	180	0.49	1.6	26	ND	9.9	80	100	0.5	ND	19	ND	ND	ND	38	220	--	--
4.2	0.5	ND	3.8	170	ND	ND	18	ND	8.2	66	140	0.6	ND	14	ND	ND	ND	32	230	--	--
4.2	3	ND	ND	120	ND	ND	18	--	10	18	6.7	ND	ND	12	ND	ND	ND	40	56	--	--
5.2	0.5	ND	5.9	260	0.56	2.4	25	ND	11	140	250	0.35	ND	22	ND	ND	ND	38	380	15	--
5.2X	0.5	--	--	--	--	--	--	--	--	--	293	--	--	--	--	--	--	--	--	--	--
5.2N	0.5	--	--	--	--	--	--	--	--	--	329	--	--	--	--	--	--	--	--	--	--
5.2S	0.5	--	--	--	--	--	--	--	--	--	161	--	--	--	--	--	--	--	--	--	--
5.2E	0.5	--	--	--	--	--	--	--	--	--	259	--	--	--	--	--	--	--	--	--	--
5.2W	0.5	--	--	--	--	--	--	--	--	--	221	--	--	--	--	--	--	--	--	--	--
6.2	0.5	ND	ND	110	0.42	ND	16	ND	10	18	4	ND	ND	11	ND	ND	ND	37	57	--	--
6.2	3	ND	ND	130	0.42	ND	20	--	13	18	3.7	ND	ND	13	ND	ND	ND	50	59	--	--

(1) Total Metals = Metals concentration in soil using USEPA methods 6010/7000
(2) WET Metals = Metals concentration in extract using California Waste Extraction Test (WET) method
(3) ND = Not Detected
(4) -- = Not Tested

TABLE 3
Summary of Laboratory Results
North 6.5-Acre Site
Organics

All concentrations in milligrams per kilogram (mg/kg)

Boring	Depth (feet)	SVOCs (8270) All Analytes	VOCs (8240) All Analytes	TRPH (418.1)	TVH (8015M)
1.3	0.5	ND	--	--	--
1.3	5	--	ND	25	ND
2.3	0.5	ND	--	--	--
2.3	5	--	ND	195	ND
3.3	0.5	ND	--	--	--
3.3	5	--	ND	50	ND
4.3	0.5	ND	--	--	--
4.3	5	--	ND	28	ND
5.3	0.5	ND	--	--	--
5.3	5	--	ND	43	ND
6.3	0.5	ND	--	--	--
6.3	5	--	ND	32	ND
1.4	0.5	ND	--	--	--
1.4	5	--	ND	25	ND
2.4	0.5	ND	--	--	--
2.4	5	--	ND	43	ND
3.4	0.5	ND	--	--	--
3.4	5	--	ND	28	ND
4.4	0.5	ND	--	--	--
4.4	5	--	ND	75	ND
5.4	0.5	ND	--	--	--
5.4	5	--	ND	28	ND
6.4	0.5	ND	--	--	--
6.4	5	--	ND	18	ND

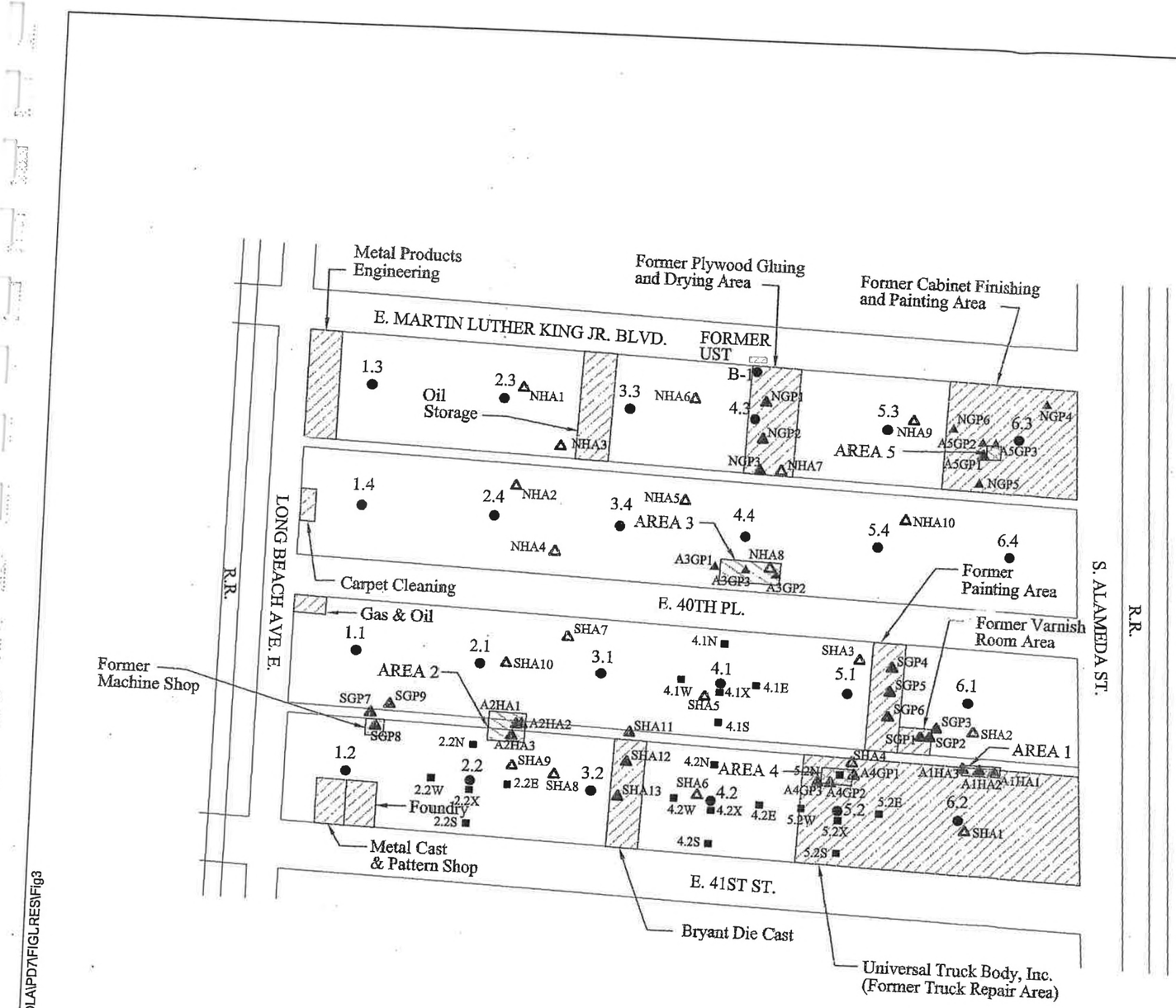
(1) SVOCs = Semivolatile Organic Compounds using USEPA method 8270
(2) VOCs = Volatile Organic Compounds using USEPA method 8240
(3) TRPH = Total Recoverable Petroleum Hydrocarbons using USEPA method 418.1
(4) TVH = Total Volatile Hydrocarbons using USEPA method 8015 Modified
(5) ND = Non-detect
(6) -- = Not Tested

TABLE 4
Summary of Laboratory Results
North 6.5-Acre Site
Metals

All concentrations in milligrams per kilogram (mg/kg)

Boring	Depth (ft)	Sb	As	Ba	Be	Cd	Cr6	Cr	Co	Cu	Pb	Hg	Mo	Ni	Se	Ag	Tl	V	Zn
1.3	0.5	ND	1.5	151	ND	ND	ND	14	8	41	90	ND	ND	11	0.3	ND	ND	27	181
2.3	0.5	ND	1.7	183	ND	ND	ND	17	10	54	523	ND	ND	13	0.2	ND	ND	36	175
3.3	0.5	ND	1.3	169	ND	ND	ND	17	10	32	77	ND	ND	57	0.3	ND	ND	37	313
4.3	0.5	ND	1.5	216	ND	ND	ND	17	9	48	195	ND	ND	13	0.3	ND	ND	33	238
5.3	0.5	ND	0.3	135	ND	ND	ND	15	9	19	22	ND	ND	12	0.3	ND	ND	32	67
6.3	0.5	ND	1.1	117	ND	ND	ND	14	9	15	ND	ND	ND	11	ND	ND	ND	32	49
1.4	0.5	ND	1.2	118	ND	ND	ND	13	8	16	ND	ND	ND	10	0.7	ND	ND	31	43
2.4	0.5	ND	0.8	134	ND	ND	ND	15	10	19	ND	ND	ND	11	0.3	ND	ND	34	54
3.4	0.5	ND	1.4	113	ND	ND	ND	11	6	32	49	ND	ND	10	ND	ND	ND	23	117
4.4	0.5	ND	ND	191	ND	ND	ND	20	10	152	28	ND	ND	15	0.2	ND	ND	39	329
5.4	0.5	ND	0.5	165	ND	ND	ND	17	11	21	3	ND	ND	13	0.3	ND	ND	41	69
6.4	0.5	ND	0.2	140	ND	ND	ND	16	11	20	5	ND	ND	13	0.3	ND	ND	39	60

(1) Metals = Metals using USEPA methods 6010/7000
(2) ND = Not Detected



LEGEND

- = AREAS OF POTENTIAL CONCERN
- = GEOPROBE SOIL SAMPLE LOCATION (PACIFIC EDGE 2003)
- = HAND AUGER SOIL SAMPLE LOCATION (PACIFIC EDGE 2003)
- = SUBSURFACE SOIL SAMPLE LOCATION (HARTCROWSER, 1994 & 1995)
- = SURFACE SOIL SAMPLE LOCATION (HARTCROWSER, 1995)

N:\P\POLA\PD7\FIG\FIG.RESI\Fig3

PACIFIC EDGE ENGINEERING, INC.
JENKINS ENVIRONMENTAL ASSOCIATES

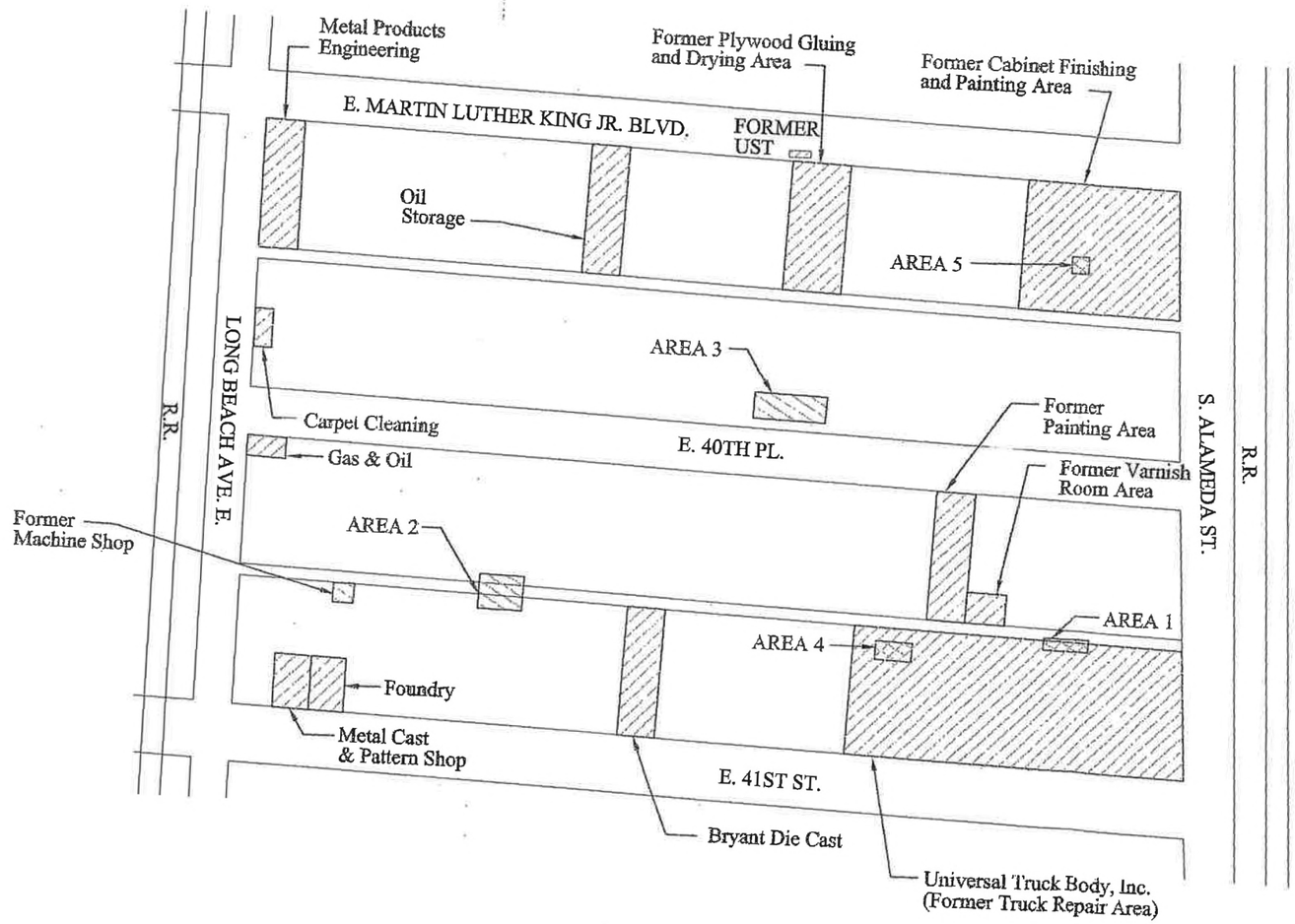
DRAFT

PRIVILEGED AND CONFIDENTIAL
ATTORNEY-CLIENT PRIVILEGED AND
ATTORNEY WORK PRODUCT DOCTRINE

LANCER SITE
LOS ANGELES, CALIFORNIA

Figure 3
BORING LOCATIONS

Date:	09/17/03		Scale: 1" = 150'
Drawn By:	CF		Sheet: 1 of 1
Checked By:	TB		



LEGEND

▨ = AREAS OF POTENTIAL CONCERN

N:\PIPOLA\PD7\FIGURES\Fig2

PACIFIC EDGE ENGINEERING, INC.
JENKINS ENVIRONMENTAL ASSOCIATES

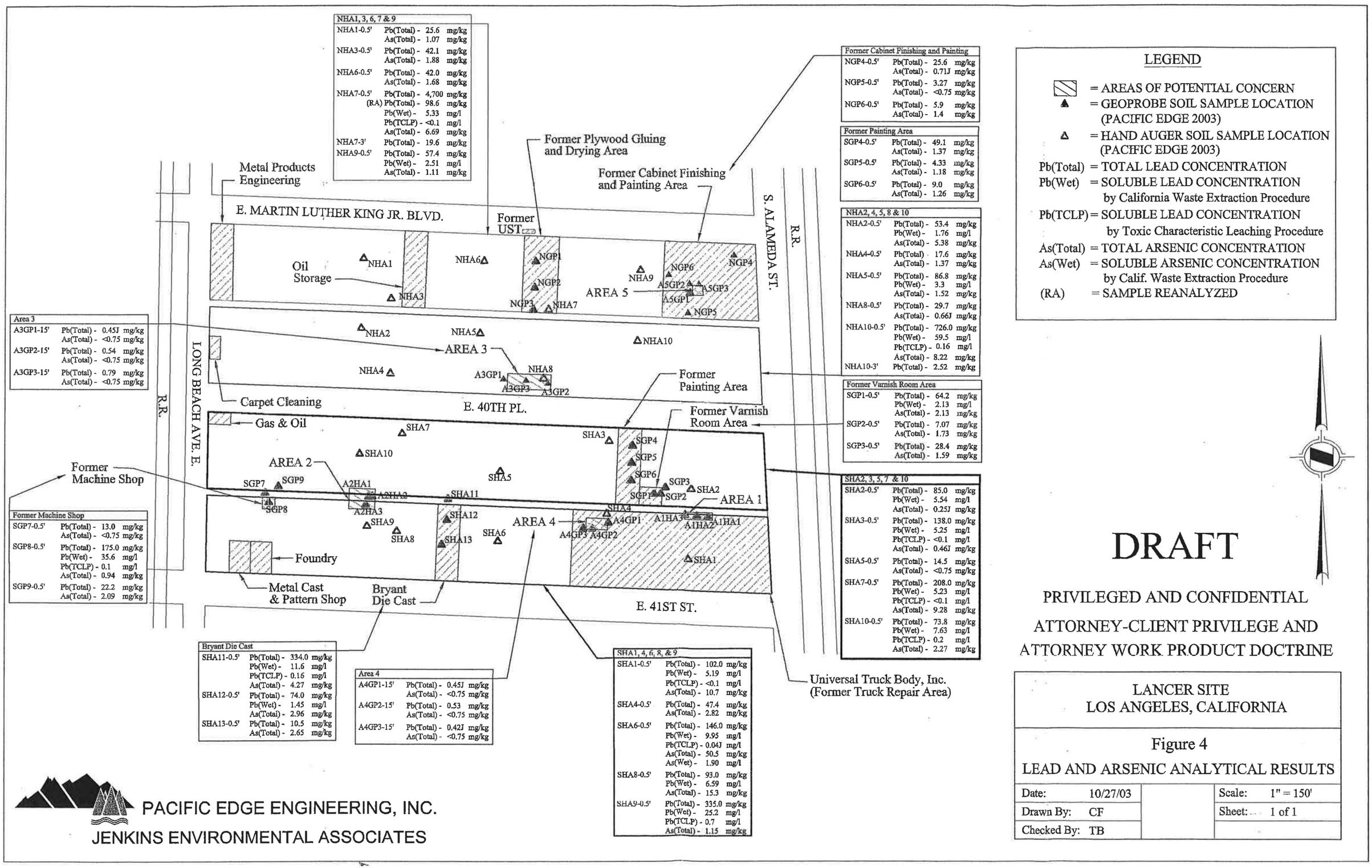
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PRIVILEGED AND CONFIDENTIAL
ATTORNEY-CLIENT PRIVILEGED AND
ATTORNEY WORK PRODUCT DOCTRINE

LANCER SITE
LOS ANGELES, CALIFORNIA

Figure 2
SITE MAP

Date:	09/17/03		Scale: 1" = 150'
Drawn By:	CF		Sheet: 1 of 1
Checked By:	TB		



PACIFIC EDGE ENGINEERING, INC.

JENKINS ENVIRONMENTAL ASSOCIATES

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ATTORNEY-CLIENT PRIVILEGE AND

ATTORNEY WORK PRODUCT DOCTRINE

LANCER SITE
LOS ANGELES, CALIFORNIA

Figure 4

LEAD AND ARSENIC ANALYTICAL RESULTS

Date:	10/27/03		Scale: 1" = 150'
Drawn By:	CF		Sheet: 1 of 1
Checked By:	TB		

APPENDIX F

PHASE I ENVIRONMENTAL SITE ASSESSMENT, SEPTEMBER 1, 2006

PHASE I
ENVIRONMENTAL SITE ASSESSMENT

For the

KEN-1
NORTHEAST CORNER OF EAST 41ST STREET
AND LONG BEACH BOULEVARD
LOS ANGELES, LOS ANGELES COUNTY,
CALIFORNIA 90058

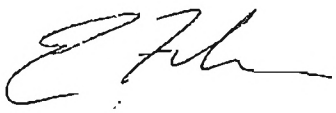
Prepared for
MR. LARRY MEYER,
ALAMEDA HOLDINGS, LLC
%
COLLIERS INTERNATIONAL
5801 EAST SLAUSON AVENUE
SUITE 160
COMMERCE, CALIFONRIA 90040

Prepared by

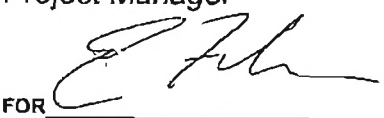
Professional Service Industries, Inc.
3960 E. Gilman Street
Long Beach, California 90815
Telephone (562) 597-3977

PSI PROJECT NO. 559-6E057

September 1, 2006



Eric Fraske
Project Manager

FOR 

Valerie Marshall, REA
Principal Consultant

PSI Information To Build On
Engineering • Consulting • Testing

August 31, 2006

Mr. Larry Meyer, Alameda Holdings, LLC
%
Colliers International
5801 East Slauson Avenue, Suite 160
Commerce, California 90040

Attn: Mr. Ken Coward
Senior Vice President

Re: Phase I Environmental Site Assessment Report
Kent-1
Northwest Corner of East 41st Street and Long Beach Boulevard
Los Angeles, California 90058
PSI Project No.: 559-6E057

Dear Mr. Coward:

In accordance with our agreement dated August 18, 2006, Professional Service Industries, Inc. (PSI) has performed a Phase I Environmental Site Assessment of the above referenced property. Please find three copies of the final report enclosed.

Thank you for choosing PSI as your consultant for this project. If you have any questions, or if we can be of additional service, please call us at (562)597-3977.

Respectfully submitted,

PROFESSIONAL SERVICE INDUSTRIES, INC.

Eric Fraske
Project Manager

Enclosures

TABLE OF CONTENTS

1. EXECUTIVE SUMMARY **1**
1.1 Phase I ESA 2
1.2 Recommendations 3
2. INTRODUCTION **5**
2.1 Purpose And Scope 5
2.2 Special Terms And Conditions 5
2.3 Methodology And Resources 6
2.4 Limitations Of Assessment 10
2.5 Significant Assumptions 11
3. PROPERTY DESCRIPTION AND PHYSICAL SETTING **12**
3.1 Location 12
3.2 Property Vicinity Characteristics 12
3.3 Description Of Property And Improvements 12
3.4 Physical Setting 12
4. PROPERTY USAGE **15**
4.1 Current Uses Of The Property 15
4.2 Past Uses Of The Subject and Adjoining Properties 15
4.3 Environmental Liens 18
5. ENVIRONMENTAL REGULATORY RECORDS REVIEW **19**
5.1 Standard Federal And State Environmental Record Sources 19
5.2 Subject Property Database Findings 21
5.3 Adjoining property Database Findings 22
5.4 Non-Adjoining property Database Findings 24
5.5 Local Regulatory Agencies 25
6. RECONNAISSANCE FINDINGS **26**
6.1 Property Reconnaissance Findings 26
6.2 Adjoining property Reconnaissance Findings 27
7. FINDINGS AND CONCLUSIONS **28**
7.1 Phase I Environmental Site Assessment 28
8. RECOMMENDATIONS **29**
9. WARRANTY **30**

LIST OF APPENDICES

APPENDIX A - MAPS AND SKETCHES
APPENDIX B - OWNERSHIP AND HISTORICAL DOCUMENTS
APPENDIX C - REGULATORY DOCUMENTATION
APPENDIX D - RECONNAISSANCE PHOTOGRAPHS
APPENDIX E - SOURCE AND INTERVIEW DOCUMENTATION
APPENDIX F - CREDENTIALS

1. EXECUTIVE SUMMARY

Professional Service Industries, Inc. (PSI) has completed a Phase I Environmental Site Assessment (ESA) of the Ken-1 project site located at the northeast corner of East 41st Street and Long Beach Boulevard, in the City of Los Angeles, Los Angeles County, California. The assessment was performed in general accordance with the scope and limitations of the American Society for Testing and Materials (ASTM) Standard E 1527-00, to comply with the contract between PSI and Colliers International date August 18, 2006. Any exceptions to, or deletions from the ASTM E 1527-00 standard of practice are described in Section 2.4 of this report. In connection with the Phase I ESA, assessment of other environmental issues to evaluate business environmental risks that are beyond the scope of the ASTM E 1527-00 standard of practice was not conducted pursuant to the authorized scope of services.

The Ken-1 project site is approximately 10 acres of vacant graded land. One paved road (East 40th Place) traverses the property east to west across the middle of the property. No evidence of wells, drains, or subterranean structures were observed during site reconnaissance. Various plants and debris pile from a former on-site farm was scattered throughout the subject property; however, no evidence suggesting the property has been used as a landfill was identified during this investigation. No structures are currently constructed on the site. The property was graded in 2006. Prior to 2006 the property was used as an agricultural farm from circa 1994 to 2006. From approximately 1928 to 1994 the subject property was used for various industrial and residential purposes. Former tenants of note include a former dry cleaning facility, a furniture company, a foundry, and an automotive service station. The vicinity of the property can generally be described as mixed commercial/light industrial. Current usage of adjoining property includes: Martin Luther King Boulevard followed by Alpha Property Management and Solar Integrated Technologies to the north; Alameda Street followed by USI Floral Imports, Pacer Furniture, and 100.Candles.Com to the east; East 41st Street followed by the Los Angeles Regional Food Center, Ironworks Welding, and Aaron's Sportswear to the south; and Long Beach Boulevard followed by multi-family residential units and two industrial buildings with no identified tenant.

Prior reports reviewed as part of this assessment revealed that subsurface soils at the subject property are contaminated with elevated levels of title 22 metals, petroleum hydrocarbons, and volatile organic compounds. No specific source of contamination was identified in the prior assessments. Previous reports suggested that these concentrations are consistent with average urban background levels and also may be a result of past releases from the variety of industrial and commercial tenants that formerly occupied the subject property. While most of these levels appear to be below regulatory action levels for industrial soils, some of the soils if taken off-site for disposal may be classified as hazardous waste.

PSI assumes that the prior reports reviewed as part of this assessment were completed with the industry standard of care. PSI can not validate the data presented in these reports, as subsurface sampling was not conducted as part of this assessment.

1.1 PHASE I ESA

In accordance with ASTM Standard E 1527-00, this Phase I Environmental Site Assessment included reconnaissance of the subject and adjoining properties, interviews, and review of historical records and regulatory databases in an effort to identify evidence of recognized environmental conditions that may impact the property. This assessment has revealed no evidence of recognized environmental conditions in connection with the property, except for the following:

ON-SITE CONDITIONS

Recognized Environmental Conditions

- Prior reports reviewed as part of this assessment revealed that subsurface soils at the subject property are contaminated with elevated levels of regulated metals, petroleum hydrocarbons, and volatile organic compounds. No specific source of contamination was identified in the prior assessments. Previous reports suggested that these concentrations are consistent with average urban background levels and also may be a result of past releases from the variety of industrial and commercial tenants that formerly occupied the subject property. The soil contamination documented at the subject property represents evidence of a recognized environmental condition in connection with the subject property.

Historical Recognized Environmental Conditions

- Various commercial and industrial tenants have occupied the subject property from 1928 to approximately 1994. These businesses include former dry cleaning facility, a furniture company, a foundry, and an automotive service station. Based on the inherent environmental risk associated with such businesses and the documented soil contamination at the subject property. The former presence of these businesses represents evidence of a recognized environmental condition.

OFF-SITE CONDITIONS

Recognized Environmental Conditions

- None

Historical Recognized Environmental Conditions

- None

Also note that these conclusions are based on previous reports that were provided to PSI as part of this investigation. Data presented in these reports is limited in nature and in some instances in conflict with each other. The limited data presented in these documents does not allow for a complete delineation of any contamination. Further subsurface assessment would be required to fully characterize this site.

1.2 RECOMMENDATIONS

Based on investigation of the property for evidence of recognized environmental conditions, PSI offers the following recommendations.

- If soil remediation will be performed by the current property owner prior to acquisition, confirmatory sampling should be performed to insure that remediation was performed to a satisfactory level (below regulatory action levels such as the California Human Health Screening Levels (CHHSLs) and the Environmental Protection Agency Region IX Preliminary Remediation Goals (PRGs). The PRGs and CHHSLs are risk based on factors such as dermal contact, accidental ingestion, or inhalation of the listed compounds for long-term exposure.

  WHAT TYPE OF ASSESSMENT ?

- If remediation of impacted soils does not occur prior to property acquisition, the future property owner should perform additional assessment to delineate the vertical and horizontal extent of soils impacted with heavy metal contamination prior to acquisition.

- PSI recommends that further investigation and remediation be conducted with the oversight of a state regulatory agency such as the California Department of Toxic Substance Control (DTSC). Successful remediation under their jurisdiction should result in a "No Further Action" letter or similar notification from the agency. This type of closure is often sought by funding institutions and property owners a possible protection against further environmental action by regulatory agencies. PSI recommends retaining legal consul to discuss if this option is appropriate. Two possible programs under jurisdiction of the DTSC include, the voluntary cleanup program (VCP) and the AB389 program. These programs provide potential property purchasers with limited liability protection with regards to environmental issues caused by previous owners. The primary difference between these two programs is that the AB389 program establishes limits for regulatory agencies to name the purchaser as a responsible party for past releases following completion of the program. These programs would include regulatory oversight of any remediation activities performed on-site and would take roughly at minimum 12 to 18 months to complete before construction activities could begin. The DTSC may require additional soil sampling as well as the completion of an environmental risk assessment as part of this program. The DTSC would also require the purchaser to pay both the assessment and regulatory agency oversight fees.

- If the time requirements for either of these programs are unsatisfactory for the overall project schedule, after the extent of contamination is determined, the soil should be excavated and removed for proper off-site disposal during construction activities. The underlying soils at the subject property should be remediated to levels below residential CHHSLs and PRGs to avoid possible deed or land use restrictions. PSI again recommends retaining legal consul to discuss if this option is appropriate.

This summary does not contain all the information that is found in the full report. The report should be read in its entirety to obtain a more complete understanding of the information provided, and to aid in any decisions made or actions taken based on this information.

2. INTRODUCTION

2.1 PURPOSE AND SCOPE

This Phase I ESA was performed to search for evidence of recognized environmental conditions that may have an adverse environmental impact upon the property. Based upon information provided to PSI, this Phase I ESA was conducted as part of a real estate transaction. The assessment included records review, interviews and reconnaissance to evaluate whether such conditions exist in connection with the property. The protocol utilized for this Phase I ESA was in general accordance with the requirements of ASTM Standard E 1527-00 as specified in the assessment contract. Assessment of other environmental issues beyond the scope of ASTM E 1527-00 was not performed in connection with the Phase I ESA. This report includes documentation to support the analysis, opinions and conclusions as presented.

2.2 SPECIAL TERMS AND CONDITIONS

AUTHORIZATION

Authorization to perform this assessment was given on August 18, 2006 by a signed copy of PSI Proposal No. 559-6E0106, between Colliers International and PSI.

PROPERTY ACCESS

Instructions as to the location of the property, access, and an explanation of the property and facilities to be assessed were provided by Mr. Ken Coward of Colliers International.

USE BY THIRD PARTIES

This report was prepared pursuant to the contract PSI has with Colliers International. That contractual relationship included an exchange of information about the property that was unique and between PSI and its client and serves as the basis upon which this report was prepared. Because of the importance of the communication between PSI and its client, reliance or any use of this report by anyone other than Colliers International, for whom it was prepared, is prohibited and therefore not foreseeable to PSI.

Reliance or use by any such third party without explicit authorization in the report does not make said third party a third party beneficiary to PSI's contract with Colliers International. Any such unauthorized reliance on or use of this report, including any of its information or conclusions, will be at the third party's risk. For the same reasons, no warranties or representations, expressed or implied in this report, are made to any such third party.

Third party reliance letters may be issued on request and upon payment of the, then current fee for such letters. All third parties relying on PSI's reports, by such reliance, agree to be bound by the proposal and PSI's General Conditions. No reliance by any party is permitted without such agreement, regardless of the content of the reliance letter itself.

2.3 METHODOLOGY AND RESOURCES

RECONNAISSANCE

Ground reconnaissance was conducted on August 23, 2006 by Mr. Eric Fraske of PSI. The ground reconnaissance consisted of observing the periphery of the property and viewing the site from accessible adjacent public thoroughfares. Interior portions of the property were systematically traversed to provide an overlapping field of view, wherever possible. Visual reconnaissance of adjoining properties was limited to areas and facilities that were readily observable from the subject property or from public access areas. Photographs were taken to document the features observed during the reconnaissance and environmental conditions of concern, where possible. A photographic log and copies of the photographs are included in Appendix D.

INTERVIEWS

Interviews were conducted with persons as noted in the following table. Records of Communication from interviews are included in Appendix E, and pertinent information reported by the interviewed parties is discussed in appropriate sections of the report.

Name	Title/Function	Affiliation	Date	Contact No.
Mr. Ken Coward	Senior Vice President	Colliers International (Client)	Various	323-726-1200
Public Records Request	NA	Los Angles County Fire Department Public Health Investigations Unit	August 20, 2006	FAX: 323-728-0217
Public Records Request	NA	Los Angeles RWQCB	August 20, 2006	FAX: 213-576-6707

ENVIRONMENTAL REGULATORY DATABASE INFORMATION

Information for the standard Federal and state environmental record sources specified in ASTM Standard E 1527-00 § 7.2.1.1 was obtained through Environmental Data Resources, Inc. (EDR). The database information was reviewed to help identify evidence of recognized environmental conditions in connection with the property. Unmappable (orphan) sites listed in the database with insufficient address or geocoding information to be mapped were evaluated for potential location within the approximate minimum search distance (AMSD). Copies of the EDR research data and a description of the databases are included in Appendix C of this report.

HISTORICAL USE INFORMATION

A history of the previous uses of the property, and properties in the surrounding area to the extent that this information was revealed in the course of researching the subject property, was developed consistent with practices specified in ASTM Standard E 1527-00 § 7.3. A summary of the standard historical sources and data reviewed by PSI is listed below. Copies of representative historical source information are provided in applicable Appendices.

Historical Data Sources	Years Reviewed	Data Source/Publisher	Note
Aerial Photographs	1928, 1938, 1947, 1956, 1965, 1976, 1989, 1994 and 2002	Environmental Data Resources, Inc.	
Fire Insurance Maps	1920, 1949, 1953, 1954, 1958, 1960, 1963, 1968 and 1970	Environmental Data Resources, Inc.	
USGS Topographic Maps	1913, 1915, 1928, 1953, 1966, 1972, 1981 and 1994	EDR Historical Topographic Map Report, Los Angeles Quadrangle	
Local Street Directories	1920 to 2004	Environmental Data Resources, Inc., City Directory Abstract	
Note Key:	**NRA = Not Reasonably Ascertainable, NLU = Not Likely to be Useful NA = None Available, NR = Not Reviewed**		

The first obvious developed use of the property identified in this assessment was prior to 1928. For purposes of ASTM Standard E 1527-00 §7.3.2.3, the term "developed use" includes agricultural uses and placement of fill. Historical information sources researched in this assessment allowed uses of the property to be reliably traced from the present back to 1928.

INFORMATION REPORTED BY USER

Pursuant to ASTM Standard E 1527-00 § 5.2 and § 5.3, PSI requested that the client provide information on any environmental liens or activity and use limitations recorded against the property, communicate any specialized knowledge or experience that is material to recognized environmental conditions in connection with the property, and identify key site managers for interview purposes. Information that was reported has been incorporated into and is discussed in appropriate sections of the report. Documents provided by the client for our use in preparation of this report are presented in applicable Appendices, and included, previous reports as listed below.

REPORT TITLE	Site Investigation Report Lancer Site
PREPARED BY	Pacific Edge Engineering, Inc.
PREPARED FOR	Port of Los Angeles
DATE OF REPORT	October 29, 2003

In October of 2003, Pacific Edge (PE) conducted a limited subsurface assessment to investigate areas of concern identified in prior reports. These areas of concern assessed as part of this investigation included:

- Two areas of soil discoloration
- Two former clarifiers
- One concrete lined pit
- The former Bryant Die Casting area (1763 East 41st Street)
- The former Universal Truck Body location (1845 East 41st Street)
- Metal Projects Engineering (4000 East Long Beach Boulevard)
- Former Painting Area (1808 40th Place)
- Former Varnishing Area (1814 40th Place)
- Former Plywood Gluing and Drying Area (1786 Martin Luther King Boulevard)

- Former Cabinet Finishing and Painting Area (1840 Martin Luther King Boulevard)
- Oil Pipelines located along Long Beach Boulevard
- Elevated lead and polynuclear aromatic hydrocarbons (PAHs) detected in a previous investigation.

In September of 2003, 24 Geoprobe and 32 handaugered borings were installed throughout the subject property.

The results of this investigation revealed:

- Concentrations of total petroleum hydrocarbons were detected in low concentrations (6.8-550 milligrams per kilogram [mg/kg]) in soil samples collected throughout the property. PE concluded that the laboratory analysis did not reveal evidence of any significant release of hydrocarbon based material and that soils with these elevated concentrations would not require removal from the site based upon applicable rules and regulations.

- Concentrations of semi-volatile organic compounds (SVOCs) were detected in a few samples. These soils contained low concentrations of PAHs and phthalates. PE concluded that none of these samples contained measurable concentrations of SVOCs that were above United States Environmental Protection Agency Region IX Preliminary Remediation Goals (PRGs) for industrial soil or would cause the soil to be classified as hazardous waste based upon applicable rules and regulations.

- Concentrations of volatile organic compounds (VOCs) were detected in relatively low concentrations (in soil samples collected at depths of five and ten feet below ground surface (bgs) throughout the property. VOCs were not detected above laboratory detection limits in any of the soil samples collected at depths of fifteen feet bgs or deeper. PE concluded that the concentrations of VOCs in subsurface soils were below respective PRGs for industrial soil and would not classify the soils as a hazardous waste.

- Elevated concentrations of lead were detected throughout the site (ranging from 0.16-726 mg/kg). These concentrations, while below PRGs for industrial soil (800 mg/kg), seventeen exceeded the State of California Title 22 Soluble Threshold Limiting Concentration (STLC) for lead. As a result PE performed the California Waste Extraction Test (WET) test on the soil samples with elevated lead concentrations and determined that at twelve (12) locations throughout the property, the soluble concentrations of lead in the soil would require the soil to be classified as a California hazardous waste should it be removed off-site. PE concluded that these elevated concentrations of lead were consistent with urban background contributions and not from a specific release.

- Concentrations of arsenic (1.9-50.5 mg/kg) were detected throughout the site. These concentrations while below applicable standards for disposal criteria were above the PRGs for industrial soil. As a result, PE concluded that additional assessment may

need to be performed prior to development. PE concluded that these elevated concentrations of arsenic were consistent with urban background contributions and not from a specific release.

- Concentrations of barium, copper, and zinc were found in several locations in excess of disposal criteria limits that would require the soil to be classified as hazardous if removed from the site. These concentrations were however below their respective PRGs for industrial soil.

- Concentrations of hexavalent chromium, organochlorine pesticides, PCB, and Herbicides were detected at low concentrations throughout the subject property. PE concluded that these concentrations were below industrial PRGs and would not require the soil to be classified as hazardous waste upon disposal.

PE did not include any recommendations in this document.

REPORT TITLE	Phase I and Phase II Environmental Site Assessment
PREPARED BY	Advantage Environmental Consultants, LLC
PREPARED FOR	The Trust For Public Land
DATE OF REPORT	May 25, 2006

In May of 2006 Advantage Environmental Consultants, LLC (AEC) performed a Phase I Environmental Site Assessment at the subject property. The following recognized environmental conditions were identified during this assessment.

- Documented concentrations of Title 22 metals, petroleum hydrocarbons, and volatile organic compounds in the subsurface soils on the subject property from previous investigations,

- A former gasoline station located at the southeast corner of Long Beach Boulevard and 40th Place,

- A former metal cast and patter foundry located at the northeast corner of Long Beach Boulevard and 41st Street, and

- A former dry-cleaning operation located on the southeastern portion of the subject property (4073 South Alameda Street).

As a result of this investigation AEC recommended a Phase II Environmental Site assessment to further investigate the above mentioned environmental concerns. In March of 2006, AEC advanced twelve (12) soil borings throughout the subject property. This investigation yielded the following results:

- No concentrations of total petroleum hydrocarbons or VOCs were detected in the soil samples above laboratory reporting limits.

- Arsenic levels in composite soil samples ranged from 3.28 to 36.6 mg/kg. To further evaluate the distribution of arsenic in the soil borings obtained from the site, the 12 discrete soil samples that comprised the composite samples were analyzed individually for total arsenic. 11 of the 12 samples contained concentrations (1.94 to 8.09 mg/kg) of arsenic with what AEC considered the typical background range for arsenic in California soils. Arsenic in one location (B6, located in the south central portion of the subject property) was reported at a concentration of 90.3 mg/kg at a depth of 0.5 feet bgs. AEC considered this concentration to be elevated above typical background levels. These concentrations are all above the PRG for arsenic in industrial soil (1.6 mg/kg) and the California Human Health Screening Level (CHHSL) for arsenic in industrial soil (0.24 mg/kg). One of these soil samples had concentrations of arsenic in excess of 10 times the STLC and would require further assessment by the WET test prior to disposal for classification purposes.

- Lead levels in discrete soil samples ranged from 17.5 to 354 mg/kg. None of soil samples contained concentration of lead that exceeded the PRG or CHHSL for industrial soil. Ten of the samples did contain concentrations of lead in excess of 10 times the STLC and would require further assessment by the WET test prior to disposal for classification purposes.

AEC concluded that soils at the subject property did not appear to be impacted with petroleum hydrocarbons or VOCs. Levels of arsenic did exceed both the PRG and CHHSL for industrial soil in one location. AEC recommended further analysis and disposal of the soil in this area if a conservative approach by the landowner was desired to mitigate the area of arsenic contamination. AEC also recommended that prior to exportation of soils at the subject property, the concentrations of metals in the subsurface soils should be evaluated with respect to waste characterization criteria. AEC recommended no further assessment of petroleum hydrocarbons, VOCs, or metals (excluding arsenic) at the subject property at that time.

ASTM NON-SCOPE SERVICES

Assessment of other environmental issues beyond the consideration of ASTM E 1527-00 was not conducted in connection with this Phase I ESA.

OTHER RESOURCES & ENVIRONMENTAL PROFESSIONAL QUALIFICATIONS

Other resources and information accessed for purposes of this site assessment are discussed in appropriate sections of the report. Published references used in the completion of this Phase I ESA not previously listed are cited at the location they are referred to in the report. Credentials and qualifications of the environmental professionals responsible for preparation of this report are included in Appendix F.

2.4 LIMITATIONS OF ASSESSMENT

Along with all of the limitations set forth in various sections of the ASTM Standard E 1527-00 protocol, the accuracy and completeness of this report is necessarily limited by the following:

- Access Limitations - None
- Physical Obstructions to Observations – Large amounts of vegetation and scattered debris piles were present throughout the site.
- Outstanding Information Requests – Requested information from the City of Los Angeles Fire Department and the South Coast Air Quality Management District has not been received at the time of this report. Further correspondence will be forwarded on for inclusion in this report upon receipt.
- Historical Data Source Failure - The first obvious developed use of the property identified in this assessment was prior to 1928. For purposes of ASTM Standard E 1527-00 §7.3.2.3, the term "developed use" includes agricultural uses and placement of fill. Historical information sources researched in this assessment allowed uses of the property to be reliably traced from the present back to 1928.
- Other - None

2.5 SIGNIFICANT ASSUMPTIONS

PSI has made the following significant assumptions in the preparation of this report:

- Groundwater Flow Direction – The direction of groundwater flow in the area of the property has been inferred based on site observations of topographic slope, proximity of nearby water bodies, EDR GeoCheck data, and review of the current USGS topographic map.
- Regulatory Records Information – PSI assumes that all information provided by EDR regarding the regulatory status of facilities within the AMSD is complete, accurate, and current.
- Other - None

3. PROPERTY DESCRIPTION AND PHYSICAL SETTING

3.1 LOCATION

The subject property is known as the Ken-1 Project Site, and it is located at the northeast corner of East 41st Street and Long Beach Boulevard in the City of Los Angeles, Los Angeles County, California. The property is bound by Long Beach Boulevard to the west; Martin Luther King Boulevard to the north; Alameda Street to the east; and East 41st Street to the South.

The subject property's location is identified on the site vicinity map provided as Figure 1 in Appendix A.

3.2 PROPERTY VICINITY CHARACTERISTICS

The property is located in a predominantly mixed commercial/light-industrial setting. Current usage of adjoining property includes: Martin Luther King Boulevard followed by Alpha Property Management and Solar Integrated Technologies to the north; Alameda Street followed by USI Floral Imports, Pacer Furniture, and 100.Candles.Com to the east; East 41st Street followed by the Los Angeles Regional Food Center, Ironworks Welding, and Aaron's Sportswear to the south; and Long Beach Boulevard followed by multi-family residential units and two industrial buildings with no identified tenant.

A site vicinity sketch is included as Figure 2 in Appendix A.

3.3 DESCRIPTION OF PROPERTY AND IMPROVEMENTS

The Ken-1 project site is approximately 10 acres of vacant graded land. One paved road (East 40th Place) traverses the property east to west across the middle of the property. No evidence of wells, drains, or subterranean structures were observed during site reconnaissance. Various plants and debris pile from a former on-site farm was scattered throughout the subject property. No structures are currently constructed on the site.

Photographs showing prominent features of the site are provided in Appendix D.

UTILITIES

No heating ventilating and air conditioning (HVAC) system, sewage disposal system or potable water source was identified on the property.

3.4 PHYSICAL SETTING

TOPOGRAPHIC MAP REVIEW

A current United States Geological Survey (USGS) 7.5 minute topographic map for the Los Angeles Quadrangle dated 1981 was reviewed as specified in ASTM Standard E 1527-00 § 7.2.3. According to the contour lines on the topographic map, the site is located approximately 208 feet above mean sea level. The topography in the immediate site area is relatively flat with a general slope to the north. The Los Angeles River is located approximately 1 mile east-northeast of the Subject Property.

The topographic map depicted the site as shaded pink indicating urban development. Two large rectangular buildings are located on the northern half of the Subject Property.

SUPPLEMENTAL PHYSICAL SETTING INFORMATION

The following discretionary physical setting sources pursuant to ASTM Standard E 1527-00 § 7.2.3, were obtained and reviewed to provide supplemental information regarding soil type and hydrogeology in the vicinity of the property.

GEOLOGY

According to a previous *Phase I Environmental Site Assessment* report prepared for the Subject Property, dated May 25, 2006, the site lies within the Peninsular Ranges Geologic Province of California. This geomorphic province is traversed by a group of northwest trending sub-parallel fault zones and encompasses an area that extends 125 miles from the Transverse Ranges and the Los Angeles Basin south to the Mexican Border and beyond another 775 miles to the tip of Baja California. Rocks within the Peninsular Range Province were emplaced during the Cretaceous age orogenic events and uplifted into the present mountain ranges during the late Tertiary and Quaternary. Igneous, metamorphic and sedimentary rocks are all found within the Peninsular Ranges. They are seismically active, with several known active faults crossing the Province.

The Subject Property is underlain by Holocene age alluvial fan deposits that consist of loose to medium dense sand, silt and gravel. Faults are not mapped on the Subject Property and the Subject Property is not located within the Alquist-Priolo Fault Zone.

SOILS

According to the United States Department of Agriculture Soil Conservation Service, Report and General Soil Map, Los Angeles County, California, Issued December 1969, the near soil associations underlying the subject property area belong to the Hanford Association, 2 to 5 percent slopes.

The Hanford soils consist of over 60 inch deep, well-drained and moderately rapid subsoil permeability. The upper 8 inches consist of pale-brown coarse sandy loam underlain by yellowish-brown coarse sandy loam and gravelly loamy coarse substratum. These soils are slightly acidic to mildly alkaline throughout but are occasionally calcareous in the lower portion.

GROUNDWATER

According to information reported on the State Water Resources Control Board Geotracker website for a Leaking Underground Fuel Tank investigation located at 4641 Pacific Boulevard, approximately 1.25 mile southeast and topographically down-gradient of the subject property, depth to groundwater was reported at approximately 34 feet below ground surface in 2006. Groundwater flow direction was reported to the northeast.

Depth to groundwater information specific to the subject property or adjoining properties was not reported.

OIL AND GAS PRODUCTION WELLS

PSI reviewed Regional Wildcat Map Number W1-5 dated June 29, 2006, published by the State of California Department of Conservation, Division of Oil, Gas and Geothermal Resources, and no past or present oil wells were depicted on Subject Property or Adjoining Properties.

4. PROPERTY USAGE

4.1 CURRENT USES OF THE PROPERTY

Current use of the property as determined through observation, interviews and records review is described below.

Currently the property is vacant graded land. It is PSI understands that the property will be developed with commercial/light industrial structures.

The User should refer to Section 6 of this report for additional site reconnaissance details.

4.2 PAST USES OF THE SUBJECT AND ADJOINING PROPERTIES

To the extent that indications of past uses of the subject and adjoining properties were identified through historical records review, reconnaissance observation, interviews, or through client provided information, they are identified below.

Year(s)	Description of Past Property Use
1913	USGS 15-Minute Topographic Map: the subject property and adjoining properties are depicted as undeveloped land with no described uses.
1915	USGS 15-Minute Topographic Map: the subject property and adjoining properties are depicted as undeveloped land with no described uses.
1928	USGS 6-Minute Topographic Map: the subject property is depicted as developed with several large rectangular and several smaller square buildings. Adjoining properties are developed with buildings and railroad tracks. An excavation is depicted in the northeastern adjoining property. Aerial photograph: the subject property and adjoining properties are depicted as mixed residential and industrial. Several single-family homes as well as multiple large and small industrial buildings are depicted on the subject property. An open excavation is depicted within the northeastern adjoining property.
1938	Aerial photograph: the subject property and adjoining properties are depicted as developed residential and industrial land. The subject property is developed with single-family residential on the western 2/3 and industrial on the eastern 1/3. Adjoining properties to the west and south are developed as residential. Adjoining properties to the north are developed as industrial with some residential on the south-most end. Adjoining properties to the east are developed for both industrial and residential use. An open excavation is visible in the northeastern adjoining property.
1947	Aerial photograph: the subject property and adjoining properties are depicted as developed residential and industrial land. The subject property is developed with single-family residential on the western 2/3 and industrial on the eastern 1/3. Adjoining properties to the west and south are developed as residential. Adjoining properties to the north are developed as industrial with some residential on the south-most end. Adjoining properties to the east are developed for industrial use. An open excavation is visible in the northeastern adjoining property.
1949	Sanborn fire insurance map: Los Angeles Period Furniture Company located in the northeast corner of the Subject Property. Utility Trailer Sales located on the Subject Property in the southeastern corner of the Subject Property. Dump Truck Body Manufacturing located in the south Adjoining property.

Year(s)	Description of Past Property Use
1953	USGS 7.5-Minute Topographic Map: the subject property and adjoining properties are depicted as developed few buildings are located on the subject property and adjoining properties. Railroad tracks are depicted to the north and east, an excavation is located on the northeastern adjoining property. Sanborn fire insurance map: Los Angeles Period Furniture Company located in the north half of the Subject Property. City Refrigerator Company and Utility Trailer Sales located on the Subject Property in the southeastern area of the Subject Property. Truck Transit Refrigeration Body Manufacturing located in the south Adjoining property.
1954	Sanborn fire insurance map: Los Angeles Period Furniture Company located in the north half of the Subject Property. City Refrigerator Company and Utility Trailer Sales located on the Subject Property in the southeastern area of the Subject Property. Truck Transit Refrigeration Body Manufacturing located in the south Adjoining property.
1956	Aerial photograph: the subject property and adjoining properties are depicted as developed residential and industrial land. The subject property is developed with single-family residential on the southern 1/2 and industrial on the northern 1/2. Adjoining properties to the west and south are developed as residential. Adjoining properties to the north and east are developed as industrial. An open excavation is visible in the northeastern adjoining property.
1958	Sanborn fire insurance map: Los Angeles Period Furniture Company located in the north half of the Subject Property. City Refrigerator Company and Utility Trailer Sales located on the Subject Property in the southeastern area of the Subject Property. Metal Cast and Pattern Shop located in the southwestern corner of the subject property. Truck Transit Refrigeration Body Manufacturing located in the south Adjoining property.
1960	Sanborn fire insurance map: Los Angeles Period Furniture Company located in the north half of the Subject Property. City Refrigerator Company and Utility Trailer Sales located on the Subject Property in the southeastern area of the Subject Property. Metal Cast and Pattern Shop located in the southwestern corner of the subject property. Truck Transit Refrigeration Body Manufacturing located in the south Adjoining property.
1962	City Directory: Joe's Service Station 4050 East Long Beach Avenue (Western portion of the subject property)
1963	Sanborn fire insurance map: Los Angeles Period Furniture Company located in the north half of the Subject Property. City Refrigerator Company and Utility Trailer Sales located on the Subject Property in the southeastern area of the Subject Property. Metal Cast and Pattern Shop located in the southwestern corner of the subject property. An automotive service station is located along the western edge of the subject property. A vehicle service station located in the south Adjoining property. Electro Plate located in the west Adjoining property.
1965	Aerial photograph: the subject property and adjoining properties are depicted as developed residential and industrial land. The subject property is developed primarily as industrial with a few residential buildings on the southwestern end. Adjoining properties to the west and south are developed as residential. Adjoining properties to the north and east are developed as industrial. The open excavation formally located on the northeastern adjoining property is no longer visible.

Year(s)	Description of Past Property Use
1966	USGS 7.5-Minute Topographic Map: the subject property is developed with two large buildings. The adjoining property to the north has a large rectangular building; adjoining properties to the west, east and north are not developed with buildings. Railroad tracks are depicted to the north and east. The excavation formally located on the northeast adjoining property is no longer visible.
1967	*City Directory: Whiteson Color and Chemical Company* 1733 East 40th Street (Central portion of the subject property)
1968	Sanborn fire insurance map: Los Angeles Period Furniture Company located in the north half of the Subject Property. City Refrigerator Company and Utility Trailer Sales located on the Subject Property in the southeastern area of the Subject Property. A vehicle service station located in the south Adjoining property. The western half of the subject property and associated Adjoining Properties are not depicted.
1970	Sanborn fire insurance map: Los Angeles Period Furniture Company located in the north half of the Subject Property. City Refrigerator Company and Utility Trailer Sales located on the Subject Property in the southeastern area of the Subject Property. Metal Cast and Pattern Shop located in the southwestern corner of the subject property. A vehicle service station located in the south Adjoining property. Electro Plate located in the west adjoining property.
1972	USGS 7.5-Minute Topographic Map: the subject property is developed with two large buildings. The adjoining property to the north has a large rectangular building; adjoining properties to the west, east and north are not developed with buildings. Railroad tracks are depicted to the north and east.
1976	Aerial photograph: the subject property and adjoining properties are depicted as developed residential and industrial land. The subject property is developed for industrial use. Adjoining properties to the west are developed as residential. Adjoining properties to the north, south and east are developed as industrial.
1981	USGS 7.5-Minute Topographic Map: the subject property is developed with two large buildings. The adjoining property to the north has a large rectangular building; adjoining properties to the west, east and north are not developed with buildings. Railroad tracks are depicted to the north and east.
1989	Aerial photograph: the subject property and adjoining properties are depicted as developed residential and industrial land. The subject property is developed for industrial use. Adjoining properties to the west are developed primarily as residential; a small amount of commercial buildings have been developed. Adjoining properties to the north, south and east are developed as industrial.
1994	USGS 7.5-Minute Topographic Map: the subject property is developed with two large buildings. The adjoining property to the north has a large rectangular building; adjoining properties to the west, east and north are not developed with buildings. Railroad tracks are depicted to the north and east. Aerial photograph: The subject property appears undeveloped. Adjoining properties are depicted as developed residential and industrial land. Adjoining properties to the west are developed primarily as residential; a small amount of commercial buildings have been developed. Adjoining properties to the north, south and east are developed as Industrial.
2002	Aerial photograph: The subject property appears to be developed for agricultural use. Adjoining properties are depicted as developed residential and industrial land. Adjoining properties to the west are developed primarily as residential; a small amount of commercial buildings have been developed. Adjoining properties to the north, south and east are developed as industrial.

Year(s)	Description of Past Property Use
2006	Site Reconnaissance: The subject property appears to be vacant graded land with large amounts of scattered debris. Current usage of adjoining property includes: Martin Luther King Boulevard followed by Alpha Property Management and Solar Integrated Technologies to the north; Alameda Street followed by USI Floral Imports, Pacer Furniture, and 100.Candles.Com to the east; East 41st Street followed by the Los Angeles Regional Food Center, Ironworks Welding, and Aaron's Sportswear to the south; and Long Beach Boulevard followed by multi-family residential units and two industrial buildings with no identified tenant.

The historical information developed and reviewed for the subject property revealed evidence of recognized environmental conditions. Historical tenants of concern are listed below. Based on the activities performed at these types of facilities, the documented soil contamination at the subject property, and the inherent environmental risk associated with such businesses, PSI considers the previous tenants to represent evidence of environmental concern in connection with the subject property.

4.3 ENVIRONMENTAL LIENS

PSI interviewed Mr. Coward who reported no knowledge of environmental liens or activity and land use limitations recorded against the property.

The User should refer to Section 6 of this report for additional site reconnaissance information on the current use of adjoining property.

5. ENVIRONMENTAL REGULATORY RECORDS REVIEW

5.1 STANDARD FEDERAL AND STATE ENVIRONMENTAL RECORD SOURCES

The number of listed sites identified within the AMSD from the Federal and state standard environmental records database listings specified in ASTM Standard E 1527-00 § 7.2.1.1 are summarized in the following table. Detailed information for sites identified within the AMSDs is provided following the table, along with an opinion about the significance of the listing to the analysis of recognized environmental conditions in connection with the subject property. Copies of the EDR research data and a description of the databases are included in Appendix C of this report.

Database	Target Property	Search Distance (Miles)	< 1/8	1/8 – 1/4	1/4 – 1/2	1/2 – 1	> 1	Total Plotted
FEDERAL RECORDS								
NPL		1.000	0	0	0	0	NR	0
Proposed NPL		1.000	0	0	0	0	NR	0
Delisted NPL		1.000	0	0	0	0	NR	0
NPL RECOVERY		TP	NR	NR	NR	NR	NR	0
CERCLIS		0.500	0	0	1	NR	NR	1
CERC-NFRAP		0.500	0	0	1	NR	NR	1
CORRACTS		1.000	0	0	0	0	NR	0
RCRA TSD		0.500	0	0	0	NR	NR	0
RCRA Lg. Quan. Gen.		0.250	0	1	NR	NR	NR	1
RCRA Sm. Quan. Gen.		0.250	8	6	NR	NR	NR	14
ERNS		TP	NR	NR	NR	NR	NR	0
HMIRS		TP	NR	NR	NR	NR	NR	0
US ENG CONTROLS		0.500	0	0	0	NR	NR	0
US INST CONTROL		0.500	0	0	0	NR	NR	0
DOD		1.000	0	0	0	0	NR	0
FUDS		1.000	0	0	0	0	NR	0
US BROWNFIELDS		0.500	0	0	0	NR	NR	0
CONSENT		1.000	0	0	0	0	NR	0
ROD		1.000	0	0	0	0	NR	0
UMTRA		0.500	0	0	0	NR	NR	0
ODI		0.500	0	0	0	NR	NR	0
TRIS		TP	NR	NR	NR	NR	NR	0
TSCA		TP	NR	NR	NR	NR	NR	0
FTTS		TP	NR	NR	NR	NR	NR	0
SSTS		TP	NR	NR	NR	NR	NR	0
ICIS		TP	NR	NR	NR	NR	NR	0
PADS		TP	NR	NR	NR	NR	NR	0
MLTS		TP	NR	NR	NR	NR	NR	0
MINES		0.250	0	0	NR	NR	NR	0
FINDS		TP	NR	NR	NR	NR	NR	0
RAATS		TP	NR	NR	NR	NR	NR	0

Database	Target Property	Search Distance (Miles)	< 1/8	1/8 – 1/4	1/4 – 1/2	1/2 – 1	> 1	Total Plotted
STATE AND LOCAL RECORDS								
CA Bond Exp. Plan		1.000	0	0	0	0	NR	0
SCH		0.250	0	0	NR	NR	NR	0
Toxic Pits		1.000	0	0	0	0	NR	0
State Landfill		0.500	0	1	0	NR	NR	1
CA WDS		TP	NR	NR	NR	NR	NR	0
WMUDS/SWAT		0.500	0	0	1	NR	NR	1
Cortese		0.500	0	1	4	NR	NR	5
SWRCY		0.500	0	0	0	NR	NR	0
LUST		0.500	0	1	3	NR	NR	4
CA FID UST		0.250	6	3	NR	NR	NR	9
SLIC		0.500	0	0	3	NR	NR	3
AOCONCERN		1.000	0	0	0	0	NR	0
UST		0.250	2	1	NR	NR	NR	3
HIST UST		0.250	3	9	NR	NR	NR	12
AST		0.250	0	0	NR	NR	NR	0
SWEEPS UST		0.250	10	10	NR	NR	NR	20
CHMIRS		TP	NR	NR	NR	NR	NR	0
Notify 65		1.000	0	0	0	0	NR	0
LA Co. Site Mitigation		TP	NR	NR	NR	NR	NR	0
DEED		0.500	0	0	0	NR	NR	0
VCP		0.500	0	0	0	NR	NR	0
DRYCLEANERS		0.250	1	1	NR	NR	NR	2
WIP		0.250	0	0	NR	NR	NR	0
Los Angeles Co. HMS		TP	NR	NR	NR	NR	NR	0
CDL		TP	NR	NR	NR	NR	NR	0
RESPONSE		1.000	0	0	2	1	NR	3
HAZNET		TP	NR	NR	NR	NR	NR	0
EMI		TP	NR	NR	NR	NR	NR	0
ENVIROSTOR		1.000	0	0	4	20	NR	24
TRIBAL RECORDS								
INDIAN RESERV		1.000	0	0	0	0	NR	0
INDIAN LUST		0.500	0	0	0	NR	NR	0
INDIAN UST		0.250	0	0	NR	NR	NR	0
EDR PROPRIETARY RECORDS								
Manufactured Gas Plants		1.000	0	0	0	0	NR	0
EDR Historical Auto Stations		0.250	0	0	NR	NR	NR	0
EDR Historical Cleaners		0.250	0	1	NR	NR	NR	1

NOTES:
TP = Target Property
NR = Not Requested at this Search Distance
Sites may be listed in more than one database

A total of 11 of unmappable sites were reported in the database findings. A review of these sites was conducted, and those that could be field verified within the AMSD are discussed in the appropriate section below.

5.2 SUBJECT PROPERTY DATABASE FINDINGS

The subject property was identified through the Federal and state environmental records review as further discussed below.

Site Address	Universal Truck Body 4073 South Alameda Street Los Angeles, California 90058	Map ID#: Distance Direction Distance (ft)	A1 Target Property
This former tenant of the subject property was identified on the Emissions Inventory Database. This database is a collection of toxics and criteria pollutant emissions data collected by the local air quality districts. According to this database, in 1987 this facility released one ton of hydrocarbon gases and one ton of reactive organic gases. No violations are reported at this facility. Based on the current regulatory status of this facility, this listing does not appear to represent evidence of a recognized environmental condition in connection with the subject property.			

Site Address	Utility Trailers 4073 South Alameda Street 1801 East 41st Street Los Angeles, California 90058	Map ID#: Distance Direction Distance (ft)	A2 and B7 Target Property
This former tenant of the subject property was identified on the Resource Conservation and Recovery Act Small Quantity Generator (RCRA-SQG) and SWEEPS underground storage tank (SWEEPS UST) database. No violations are reported at this facility. The type(s) of waste generated at this facility were not listed in this database. While this facility is listed on the SWEEPS UST database, no tanks are listed at this address. Based on the current regulatory status of this facility, this listing does not appear to represent evidence of a recognized environmental condition in connection with the subject property.			

Site Address	Walter Miller Express Cleaner 1835 East 41st Street Los Angeles, California 90011	Map ID#: Distance Direction Distance (ft)	4 Target Property
This former tenant of the subject property was identified on the RCRA-SQG, and Cleaners databases. No violations are reported at this facility. The type(s) of waste generated at this facility were not listed in this database. According to the Cleaners database, a file for this facility was created in 1988 and closed in 1997. While records of releases are reported at this facility, based on the inherent environmental risk associated with such facilities, the former presence of this facility on the subject property represents evidence of a recognized environmental condition in connection with the subject property.			

Site Address	Los Angeles Harbor Department 1786 East Martin Luther King Boulevard Los Angeles, California 90058	Map ID#: Distance Direction Distance (ft)	C13 Target Property

The subject property was identified on the Underground Storage Tank (UST) database. No information regarding the tank size, age, or location was reported on this database.

According to Los Angeles Bureau of Fire Prevention file information obtained by AEC in their 2006 assessment. This underground storage tank was located in the northern adjoining sidewalk along Martin Luther King Boulevard. This tank was removed on March 7, 1996. Soil sampling performed at the time of removal revealed non detectable concentrations of total petroleum hydrocarbons, benzene, toluene, xylene, and ethylene.

Based on the laboratory results of the sampled soil, former location of the tank, and subsequent removal, this listing does not appear to represent evidence of a recognized environmental condition in connection with the subject property.

5.3 ADJOINING PROPERTY DATABASE FINDINGS

Adjoining properties as defined in ASTM Standard E 1527-00 § 3.3.2 were identified through the Federal and state environmental records review as further discussed below.

Site Address	Westside Rehab Corporation 1755 East Martin Luther King Boulevard Los Angeles, California 90058	Map ID#: Distance Direction Distance (ft)	B3 < 1/8 Mile North (Northern Adjoining property) Approximately 50 feet

The former tenant of the northern adjoining property was identified on the Incident Tracking, Compliance Assistance, and Compliance Monitoring (ICIS) database. This database (currently under development) was designed to track and include information regarding federal administrative and judicial enforcement actions. According to this database, in September of 2002 a civil enforcement action was registered for this property. No additional information was reported on this database. No reports of releases or violations were reported for this facility on other environmental regulatory databases. Based on available information, this listing does not appear to represent evidence of a recognized environmental condition in connection with the subject property.

Site Address	Alameda Painting Company 1714 East 41st Street Los Angeles, California 90058	Map ID#: Distance Direction Distance (ft)	9 < 1/8 Mile South (Southern Adjoining property) Approximately 50 feet

The former tenant of the southern adjoining property was identified on the RCRA-SQG and HAZNET databases. This facility is located topographically down-gradient of the subject property. No violations are reported at this facility. This facility has reported disposing of approximately 2.5227 tons of an unspecified solvent mixture waste to an off-site recycler. No releases or spills are reported at this facility.

Based on the down-gradient location of this facility with respect to the subject property and the current regulatory status of this facility, these listings do not appear to represent evidence of a recognized environmental condition in connection with the subject property.

Site Address	Borstein Enterprises 1791 East Martin Luther King Boulevard Los Angeles, California 90058	Map ID#: Distance Direction Distance (ft)	C10 < 1/8 Mile North (Northern Adjoining property) Approximately 50 feet

The former tenant of the northern adjoining property was identified on the HAZNET database. This facility is located topographically up-gradient of the subject property. This facility has reported disposing of 0.000 tons of an unspecified sludge waste. No violations or releases are reported at this facility.

Based on the reported amount of hazardous material disposed of and the current regulatory status of this facility, this listing does not appear to represent evidence of a recognized environmental condition in connection with the subject property.

Site Address	Ken Wesgarth Construction 1755 East Martin Luther King Boulevard Los Angeles, California 90058	Map ID#: Distance Direction Distance (ft)	B7 and B11 < 1/8 Mile North (Northern Adjoining property) Approximately 50 feet

The former tenant of the northern adjoining property was identified on the California Facility Index Database Underground Storage Tank (CA FID UST) and the Underground Storage Tank (UST) database. This facility is located topographically up-gradient of the subject property.
According to these databases, this facility has been listed as an active UST location since October 22, 1993. No other information regarding the size, contents, or number of tanks at this facility was listed in this database. No reports of leaking tanks or violations were reported in this database.

Based on the current regulatory status of this facility, these listings do not appear to represent evidence of a recognized environmental condition in connection with the subject property.

Site Address	Omega Environmental Services 1755 East Martin Luther King Boulevard Los Angeles, California 90058	Map ID#: Distance Direction Distance (ft)	B12 < 1/8 Mile North (Northern Adjoining property) Approximately 50 feet

The former tenant of the northern adjoining property was identified on the RCRA-SQG database. No violations are reported at this facility. The type(s) of waste generated at this facility were not listed in this database.

Based on the current regulatory status of this facility, this listing does not appear to represent evidence of a recognized environmental condition in connection with the subject property.

Site Address	LEARONAL 2910 South Alameda Street Vernon, California 90058	Map ID#: Distance Direction Distance (ft)	I34 < 1/8 Mile East (Eastern Adjoining property) Approximately 75 feet

This former tenant of the eastern adjoining property was identified on the RCRA-SQG database. This facility is located topographically cross-gradient of the subject property. No violations are reported at this facility. The type(s) of waste generated at this facility were not listed in this database.

Based on the current regulatory status of this facility, this listing does not appear to represent evidence of a recognized environmental condition in connection with the subject property.

Site Address	Olin Corporation Olin Water Services 3312 East Long Beach Boulevard Los Angeles, California 90058	Map ID#: Distance Direction Distance (ft)	15 < 1/8 Mile North (Northern Adjoining property) Approximately 50 feet

This former tenant of the northern adjoining property was identified on the RCRA-SQG, SWEEPS UST, and CA FID UST databases. This facility is located topographically up-gradient of the subject property. No violations are reported at this facility. The type(s) of waste generated at this facility were not listed in this database.

While this facility is listed on the SWEEPS UST database, no tanks are listed at this address. According to the CA FID UST database, this facility was listed as an active UST location on October 22, 1993. No further information regarding the size, age, or number of tanks at this facility were listed in this database. No reports of leaking tanks or violations were reported in this database.

Based on the current regulatory status of this facility, these listings do not appear to represent evidence of a recognized environmental condition in connection with the subject property.

5.4 NON-ADJOINING PROPERTY DATABASE FINDINGS

Non-adjoining properties within the AMSD were identified through the federal and state environmental records review as further discussed below.

It should be noted that only those properties situated 'upgradient' relative to the subject property, located within 1/8 of a mile from the subject property, and those that have reported a release of contaminants or are known hazardous waste sites are discussed below, as these properties are the most likely to represent an environmental concern to the subject property should a release of contaminants to the groundwater have occurred. Refer to Appendix C for a full listing of identified properties.

Site Address	RENU Plating Corporation 1531 East 32nd Street Los Angeles, California 90011	Map ID#: Distance Direction Distance (ft)	P57 Northwest 1/4-1/2 Mile 1,562 Feet

This facility was identified on the RCRA-SQG, HAZNET, and Comprehensive Environmental Response, Compensation, and Liability System No Further Remedial Action Planned (CERC-NFRAP) databases. This facility is located topographically up-gradient of the subject property.

No RCRA violations are reported at this facility. This facility has reported disposing of approximately 0.15 tons of other inorganic solid waste to a transfer station.

This facility was designated a CERCLIS site on May 1, 1986. After an ensuing investigation the site was placed on the CERC-NFRAP database on September 1, 1987. No information regarding this facilities placement on the CERCLIS database was listed in the EDR report.

Based on the current regulatory status of this facility and the distance from the subject property, these listings are not considered evidence of a recognized environmental condition in connection with the subject property at this time.

Site Address	A A D Disposal 2306 38th Street East Vernon, California 90058	Map ID#: Distance Direction Distance (ft)	S67 East 1/4-1/2 Mile 2,092 Feet

This facility was identified on the CERCLIS and RCRA Large Quantity Generator (RCRA-LQG) databases. This facility is located topographically cross-gradient of the subject property.

No RCRA violations are reported at this facility. This facility has reported disposing of approximately 0.15 tons of other inorganic solid waste to a transfer station.

This facility was designated a CERCLIS site on September 28, 2000 after improper handling and storage practices of chlorinated solvents were discovered at this facility. Subsequent investigations revealed that the soil and groundwater beneath the site is contaminated with chlorinated solvents. Remediation is underway and a responsible party for this contamination has been named.

Based on the current regulatory status of this facility, cross-gradient location, and the distance from the subject property, these listings are not considered evidence of a recognized environmental condition in connection with the subject property at this time.

5.5 Local Regulatory Agencies

PSI contacted the City of Los Angeles Fire Department, UST Unit, for information on USTs for the subject property. No response has been received at the time of this report. Further correspondence will forwarded on for inclusion in this report upon receipt.

PSI contacted the City of Los Angeles Fire Department, Hazardous Materials Division, for information on hazardous materials disclosure information for the subject property. No response has been received at the time of this report. Further correspondence will forwarded on for inclusion in this report upon receipt.

PSI reviewed the South Coast Air Quality Management District website for information on air quality permits that may have been issued to the subject property. No response has been received at the time of this report. Further correspondence will forwarded on for inclusion in this report upon receipt.

6. RECONNAISSANCE FINDINGS

6.1 PROPERTY RECONNAISSANCE FINDINGS

A summary of uses and conditions consistent with ASTM Standard E 1527-00 § 8.4 indicating the likelihood of recognized environmental conditions in connection with the property is provided below. For each of the uses or conditions identified on the property, detailed information is discussed following the summary along with an opinion about the significance of the listing to the analysis of recognized environmental conditions in connection with the subject property.

IDENTIFIED YES	IDENTIFIED NO	
☐	☒	Hazardous Substances In Connection With Identified Uses
☐	☒	Petroleum Products In Connection With Identified Uses
☐	☒	Aboveground Or Underground Storage Tanks (ASTs/USTs)
☐	☒	Suspect Containers Not In Connection With Identified Use
☐	☒	Electrical Or Mechanical Equipment Likely To Contain PCBs
☐	☒	Interior Stains Or Corrosion
☐	☒	Drains Or Sumps
☐	☒	Wastewater Discharges
☐	☒	Septic Or Sewage Tanks
☐	☒	Pits, Ponds Or Lagoons
☐	☒	Pools Of Liquid Or Standing Water
☒	☐	Solid Waste Dumping, Landfills Or Suspect Fill Material
☐	☒	Stained Soil Or Pavement
☐	☒	Stressed Vegetation
☐	☒	Wells
☐	☒	Odors
☐	☒	Other Uses Or Conditions Of Concern

SOLID WASTE DUMPING, LANDFILLS OR SUSPECT FILL MATERIAL

To the extent observed or identified through interviews, areas of solid waste disposal or suspect fill material identified on the property are described below.

Large quantities of trash and litter were observed throughout the property. None of the rubbish appeared to be hazardous in nature. A work crew was observed picking up this debris for disposal. Based on the observed non-hazardous nature of this debris and the ongoing removal operation at the subject property, its presence does not appear to represent evidence of a recognized environmental concern in connection with the subject property.

6.2 ADJOINING PROPERTY RECONNAISSANCE FINDINGS

A summary of uses and conditions identified on adjoining properties consistent with ASTM Standard E 1527-00 § 8.4 indicating the likelihood of recognized environmental conditions in connection with the subject property is provided below. For each of the uses or conditions identified on adjoining properties, detailed information is discussed following the summary along with an opinion about the significance of the listing to the analysis of recognized environmental conditions in connection with the subject property.

IDENTIFIED YES	IDENTIFIED NO	
☐	☒	Hazardous Substances In Connection With Adjoining property Use
☐	☒	Petroleum Products In Connection With Adjoining property Use
☐	☒	Aboveground Or Underground Storage Tanks (ASTs/USTs)
☐	☒	Suspect Containers
☒	☐	Electrical Or Mechanical Equipment Likely To Contain PCBs
☐	☒	Stains Or Corrosion On Interior Of Facility
☐	☒	Drains Or Sumps
☐	☒	Wastewater Discharges
☐	☒	Septic Or Sewage Tanks
☐	☒	Pits, Ponds Or Lagoons
☐	☒	Pools Of Liquid Or Standing Water
☐	☒	Solid Waste Dumping, Landfills Or Suspect Fill Material
☐	☒	Stained Soil Or Pavement
☐	☒	Stressed Vegetation
☐	☒	Wells
☐	☒	Odors
☐	☒	Other Uses Or Conditions Of Concern

ELECTRICAL OR MECHANICAL EQUIPMENT LIKELY TO CONTAIN PCBS

To the extent observed or identified through interviews, stationary electrical or mechanical equipment identified on adjoining property and known to contain polychlorinated biphenyls (PCBs), or likely to contain PCBs, are described below.

PSI observed pole-mounted electrical transformers on the public sidewalk along the streets adjoining the subject property. The transformers appeared in good condition with no signs of leaks or staining at the base of the pole. The transformers are owned and maintained by the Los Angeles Department of Water and Power. The transformers are not considered to be a recognized environmental condition in connection with the subject property.

7. FINDINGS AND CONCLUSIONS

7.1 PHASE I ENVIRONMENTAL SITE ASSESSMENT

PSI has performed a Phase I Environmental Site Assessment in general conformance with the scope and limitations of the ASTM Standard E 1527-00 protocol of the Ken-1 project site in the City of Los Angeles, California. Exceptions to or deletions from this protocol are discussed earlier in this report. This assessment has revealed no evidence of recognized environmental conditions in connection with the property except for the following:

ON-SITE CONDITIONS

Recognized Environmental Conditions

- Prior reports reviewed as part of this assessment revealed that subsurface soils at the subject property are contaminated with elevated concentrations of Title 22 metals, petroleum hydrocarbons, and volatile organic compounds. No specific source of contamination was identified in the prior assessments. Previous reports suggested that these concentrations are consistent with average urban background levels and also may be a result of past releases from the variety of industrial and commercial tenants that formerly occupied the subject property. The soil contamination documented at the subject property represents evidence of a recognized environmental condition in connection with the subject property.

Historical Recognized Environmental Conditions

- Various commercial and industrial tenants have occupied the subject property from 1928 to approximately 1994. These businesses include former dry cleaning facility, a furniture company, a foundry, and an automotive service station. Based on the inherent environmental risk associated with such businesses and the documented soil contamination at the subject property. The former presence of these businesses represents evidence of a recognized environmental condition.

OFF-SITE CONDITIONS

Recognized Environmental Conditions

- None

Historical Recognized Environmental Conditions

- None

8. RECOMMENDATIONS

Based on investigation of the property for evidence of recognized environmental conditions and other environmental issues, PSI offers the following recommendations.

- If soil remediation will be performed by the current property owner prior to acquisition, confirmatory sampling should be performed to insure that remediation was performed to a satisfactory level (below regulatory action levels such as the California Human Health Screening Levels (CHHSLs) and the Environmental Protection Agency Region IX Preliminary Remediation Goals (PRGs). The PRGs and CHHSLs are risk based on factors such as dermal contact, accidental ingestion, or inhalation of the listed compounds for long-term exposure.

- If remediation of impacted soils does not occur prior to property acquisition, the future property owner should perform additional assessment to delineate the vertical and horizontal extent of soils impacted with heavy metal contamination prior to acquisition.

- PSI recommends that further investigation and remediation be conducted with the oversight of a state regulatory agency such as the California Department of Toxic Substance Control (DTSC). Successful remediation under their jurisdiction should result in a "No Further Action" letter or similar notification from the agency. This type of closure is often sought by funding institutions and property owners a possible protection against further environmental action by regulatory agencies. PSI recommends retaining legal consul to discuss if this option is appropriate. Two possible programs under jurisdiction of the DTSC include, the voluntary cleanup program (VCP) and the AB389 program. These programs provide potential property purchasers with limited liability protection with regards to environmental issues caused by previous owners. The primary difference between these two programs is that the AB389 program establishes limits for regulatory agencies to name the purchaser as a responsible party for past releases following completion of the program. These programs would include regulatory oversight of any remediation activities performed on-site and would take roughly at minimum 12 to 18 months to complete before construction activities could begin. The DTSC may require additional soil sampling as well as the completion of an environmental risk assessment as part of this program. The DTSC would also require the purchaser to pay both the assessment and regulatory agency oversight fees.

- If the time requirements for either of these programs are unsatisfactory for the overall project schedule, after the extent of contamination is determined, the soil should be excavated and removed for proper off-site disposal during construction activities. The underlying soils at the subject property should be remediated to levels below residential CHHSLs and PRGs to avoid possible deed or land use restrictions. PSI again recommends retaining legal consul to discuss if this option is appropriate.

9. WARRANTY

PHASE I ENVIRONMENTAL SITE ASSESSMENT

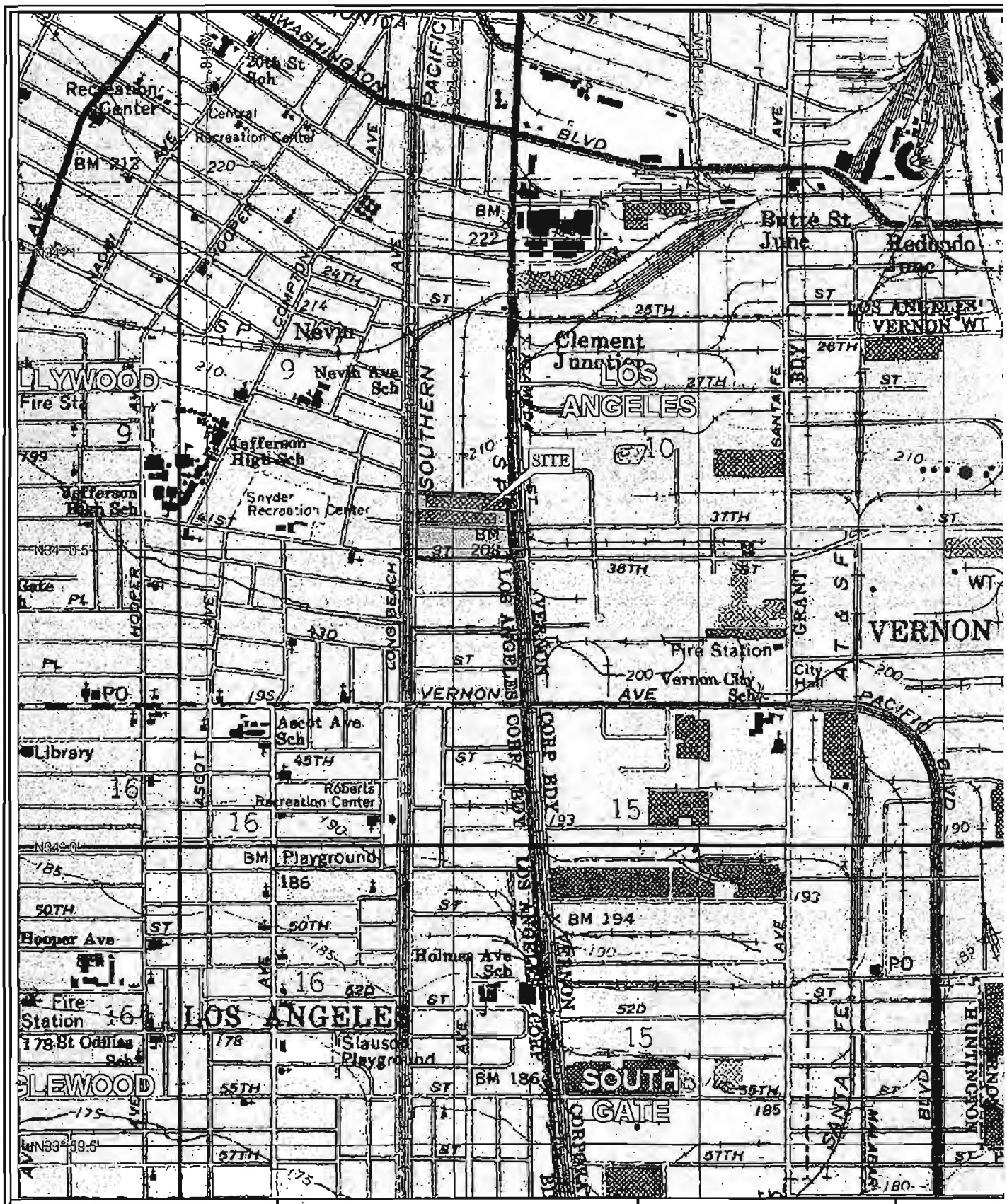
PSI warrants that the findings and conclusions contained herein were accomplished in accordance with the methodologies set forth in the ASTM Standard E 1527-00 protocol. These methodologies are described by the standard as representing good commercial and customary practice for conducting an Environmental Site Assessment of a parcel of property for the purpose of identifying recognized environmental conditions. However, these findings and conclusions contain all of the limitations inherent in these methodologies that are referred to in the protocol and some of which are more specifically set forth below.

UNIDENTIFIABLE CONDITIONS

There is a possibility that even with proper application of these methodologies, conditions may exist on the property that could not be identified within the scope of the assessment or that were not reasonably identifiable from the available information. PSI believes that the information obtained from the records review and the interviews concerning the property is reliable. However, PSI cannot and does not warrant or guarantee that the information provided by these other sources is accurate or complete. The methodologies of this assessment are not intended to produce all inclusive or comprehensive results, but rather to provide the client with information regarding apparent suspicions of existing and potential adverse environmental conditions relating to the subject property.

No other warranties are implied or expressed.

APPENDIX A - MAPS AND SKETCHES



psi Information To Build On
Engineering • Consulting • Testing

3960 Gilman Street
Long Beach, CA 90815
562/597-3977

PROJECT NAME:

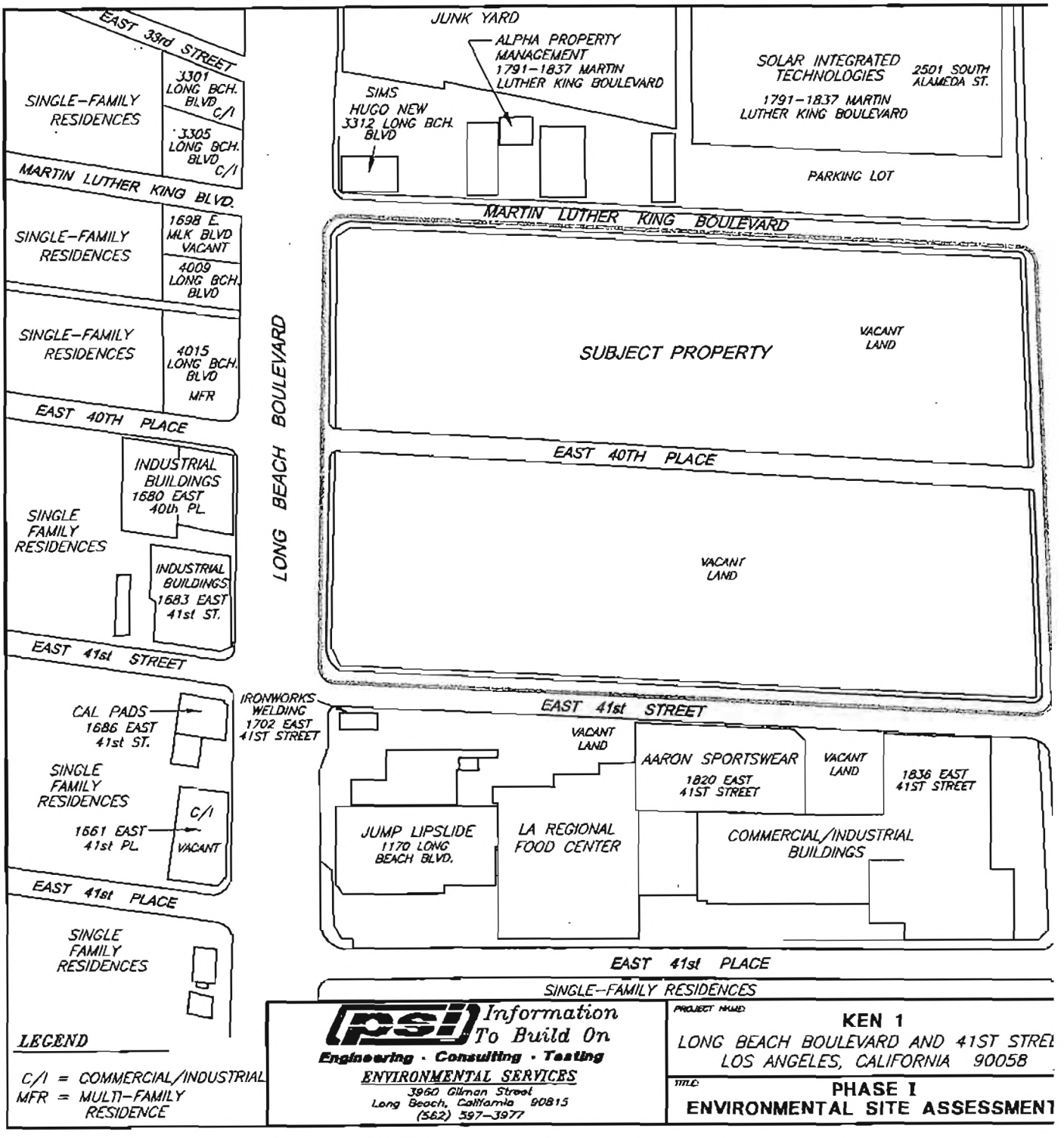
Ken-1
Northwest corner of East 41st Street and South Alameda Avenue
Los Angeles, California 90058

FIGURE 1 - SITE VICINITY MAP

Map:
Los Angeles Quadrangle
7.5' USGS Topographic Map

Scale: 1: 16,000
Date: 1981

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ENVIRONMENTAL SERVICES

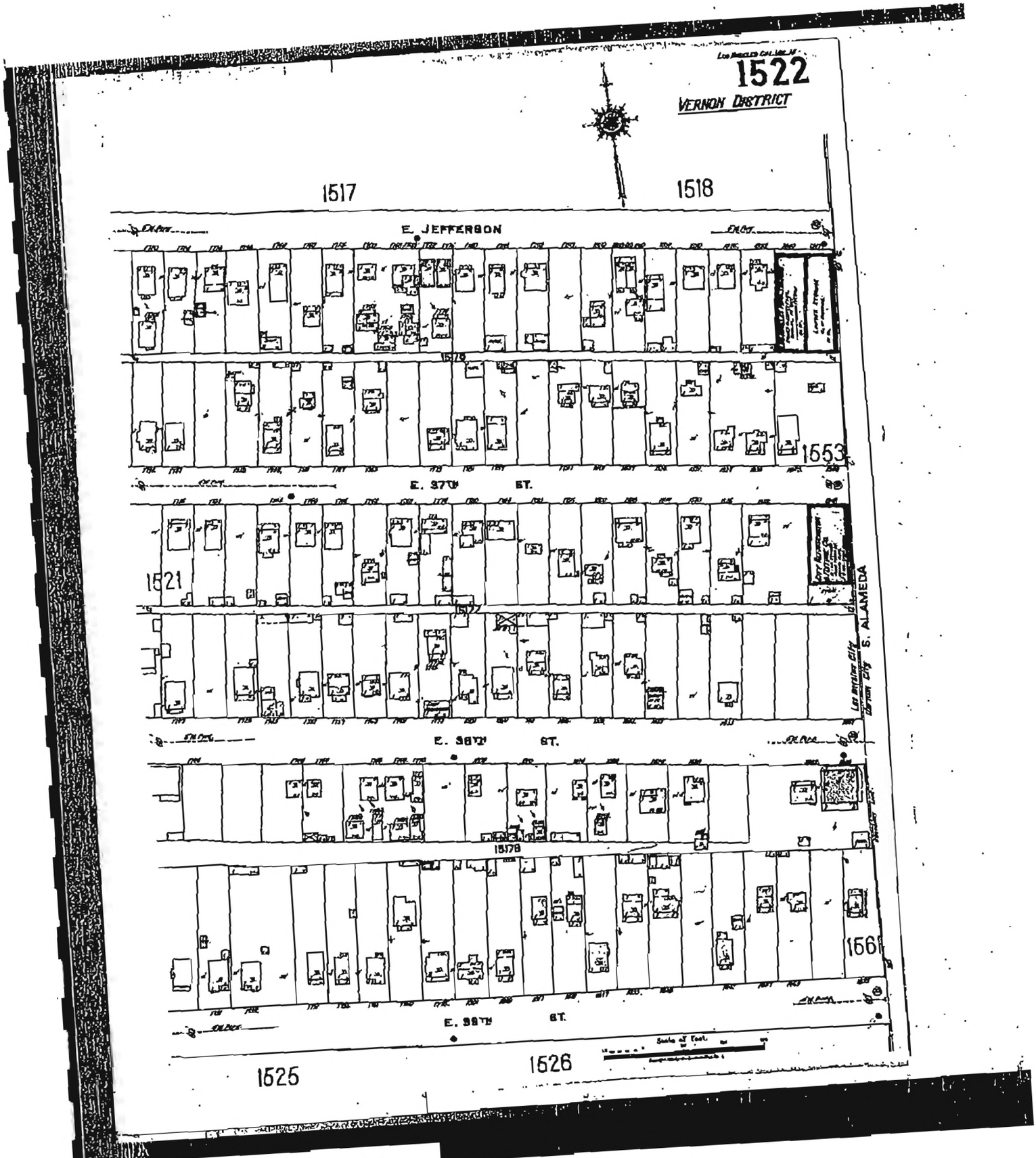
3960 Gilman Street
Long Beach, California 90815
(562) 597-3977

PROJECT NAME: KEN 1

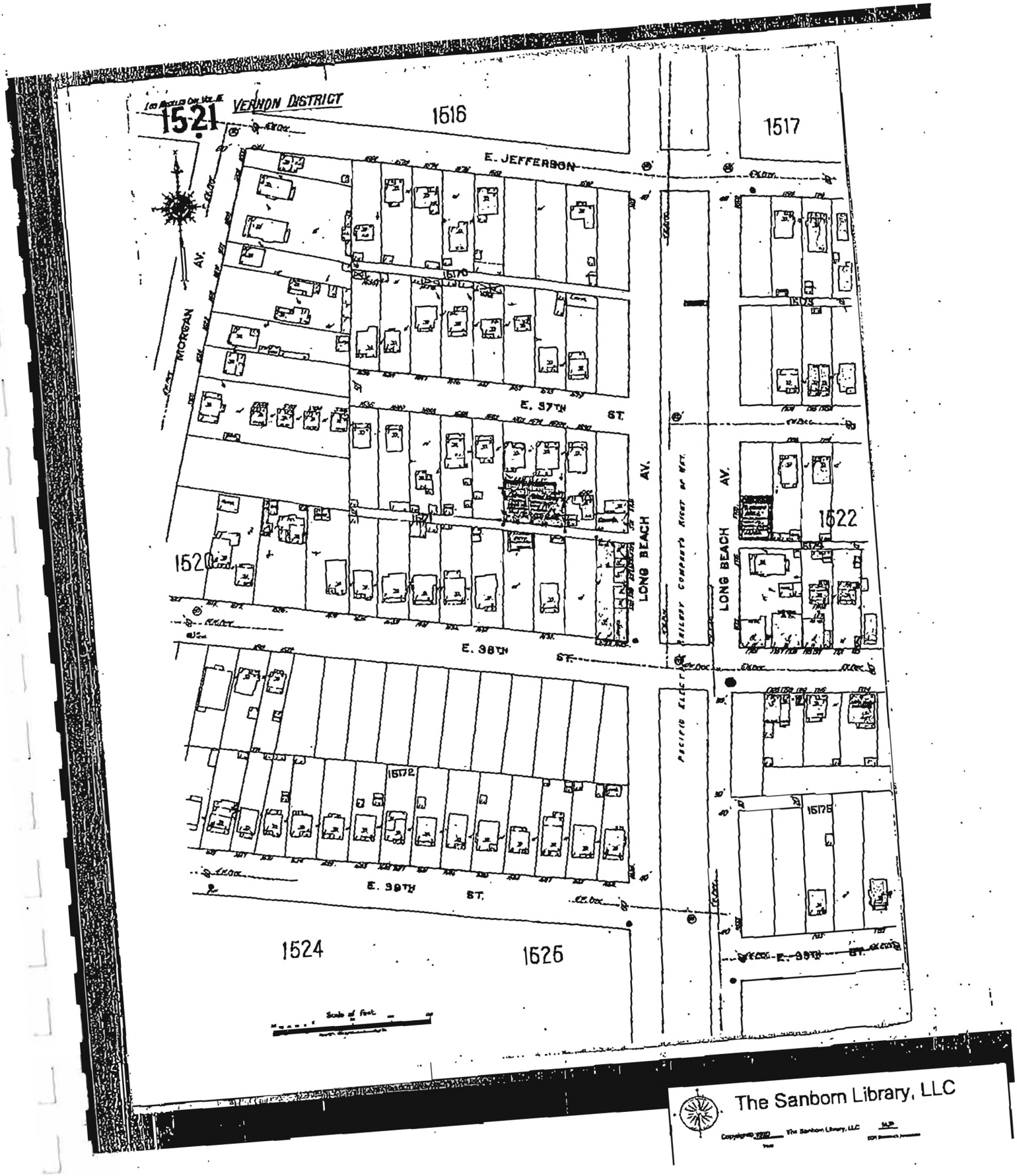
LONG BEACH BOULEVARD AND 41ST STREE
LOS ANGELES, CALIFORNIA 90058

TITLE: PHASE I ENVIRONMENTAL SITE ASSESSMENT

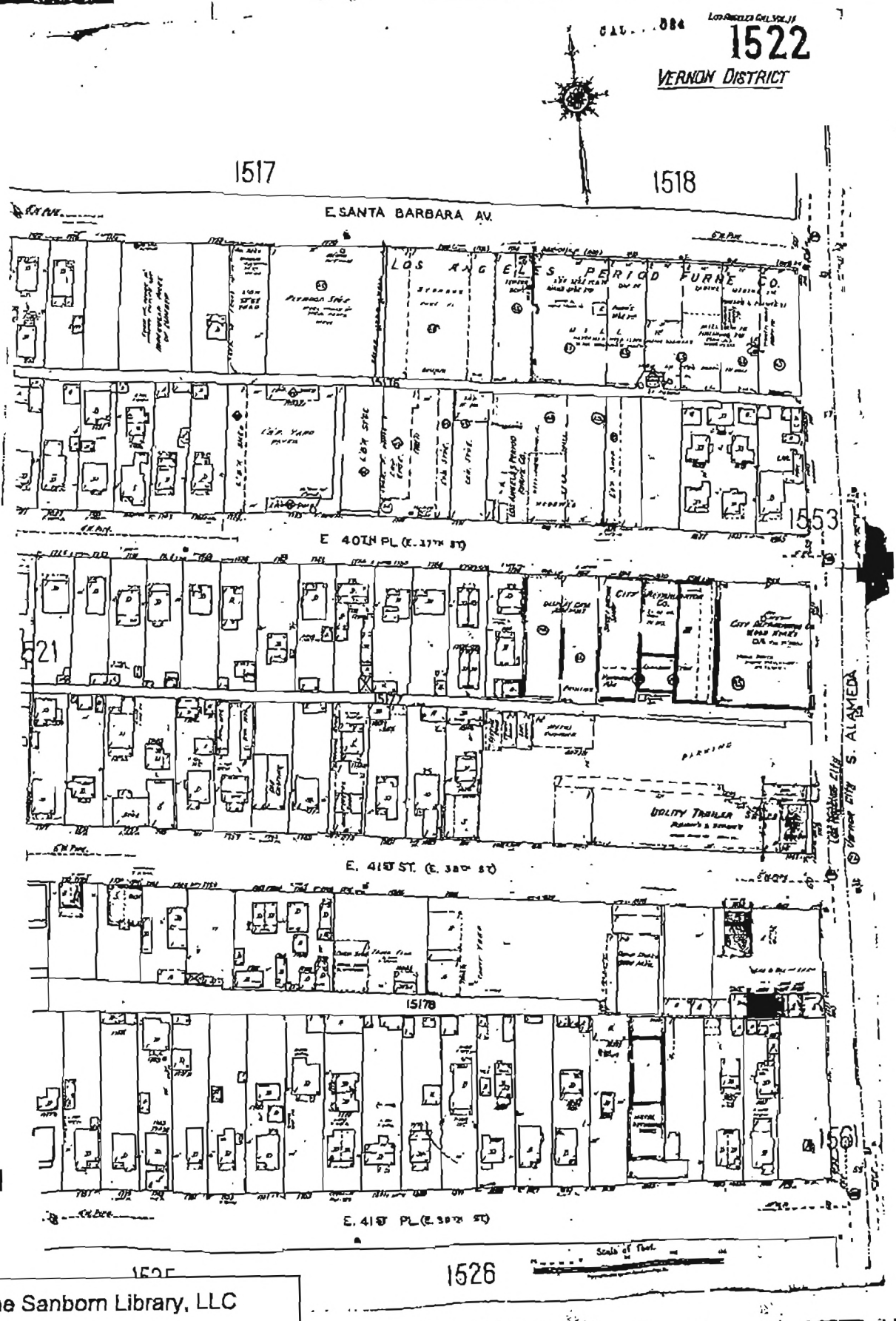
APPENDIX B - OWNERSHIP AND HISTORICAL DOCUMENTS



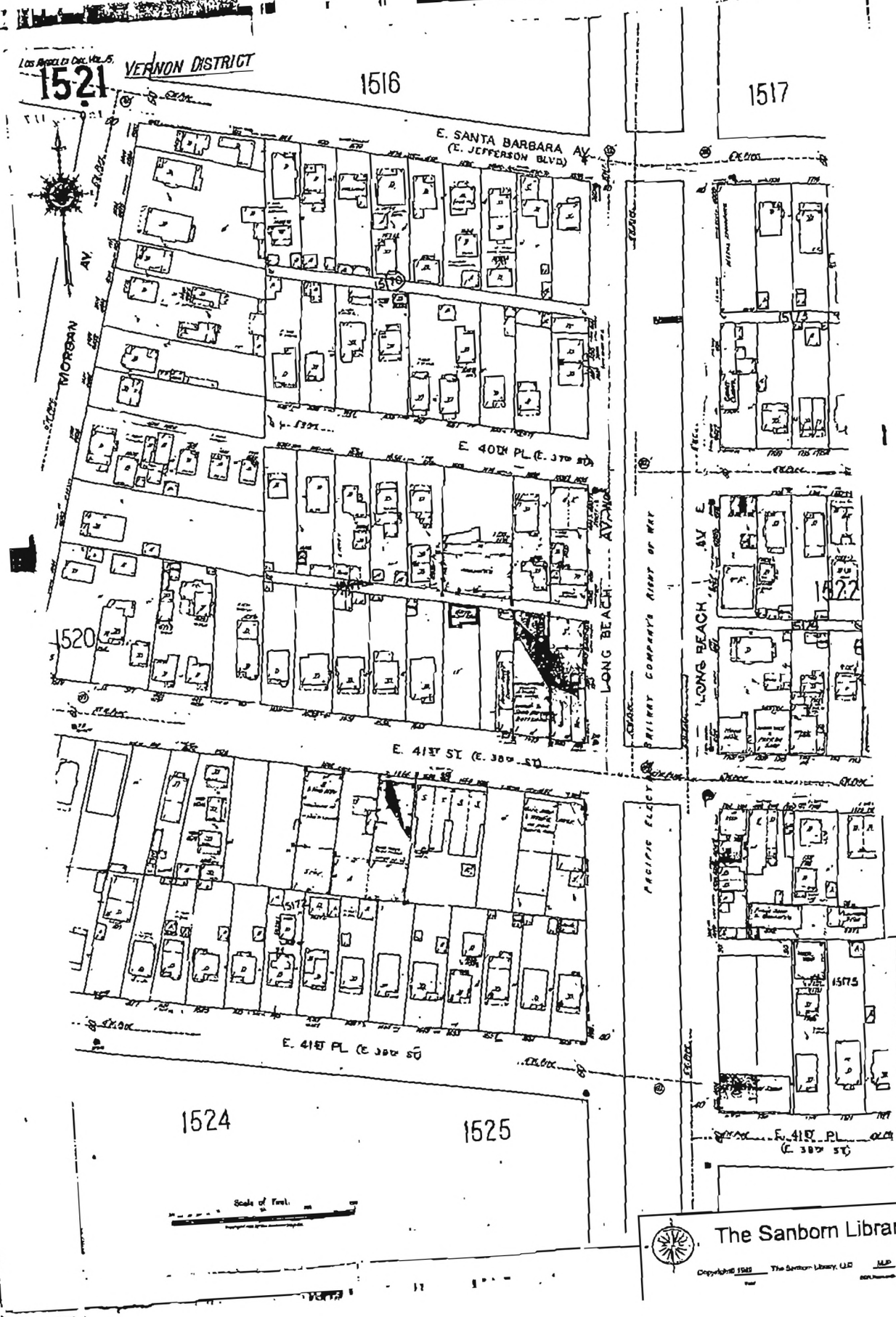
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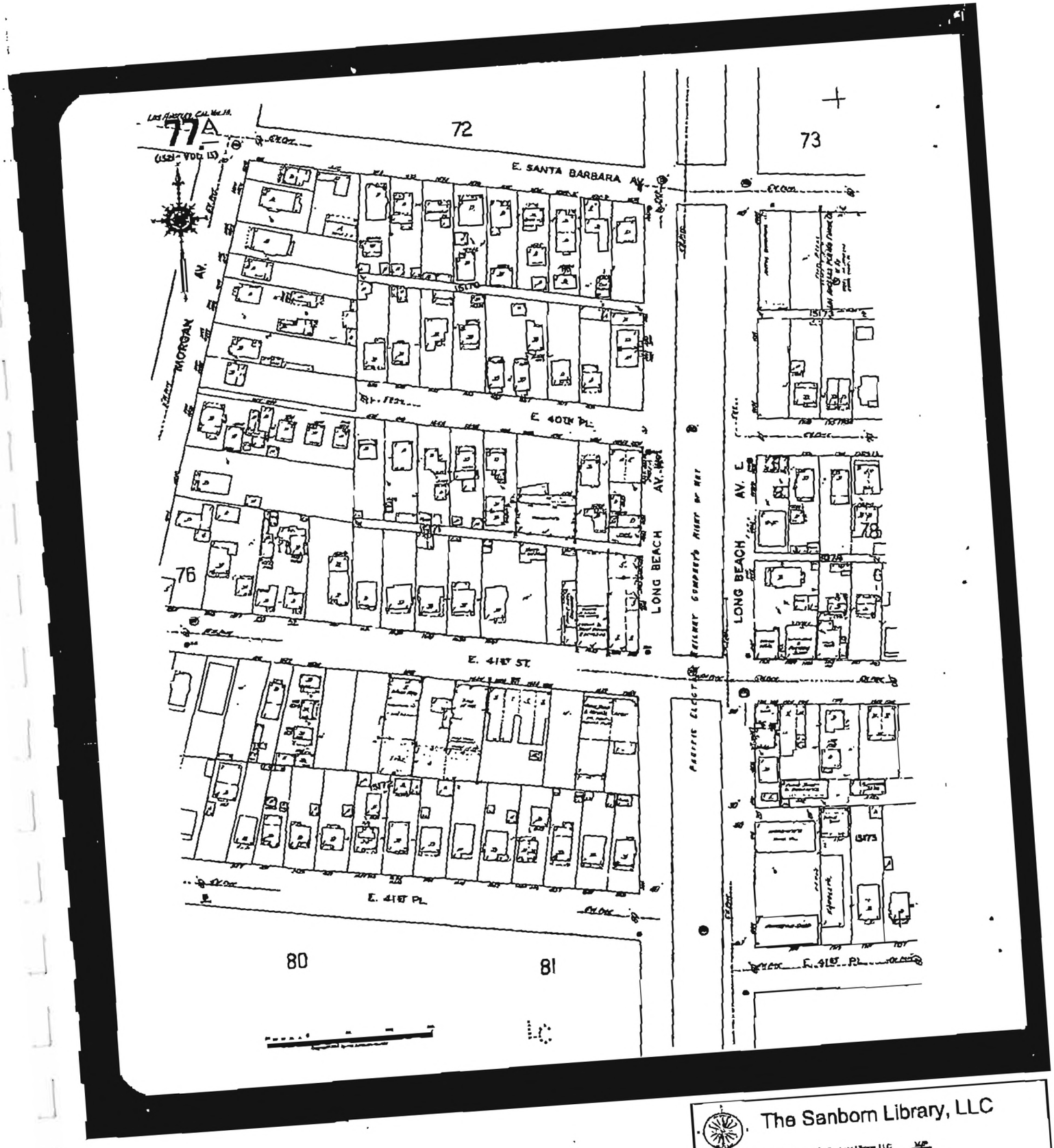
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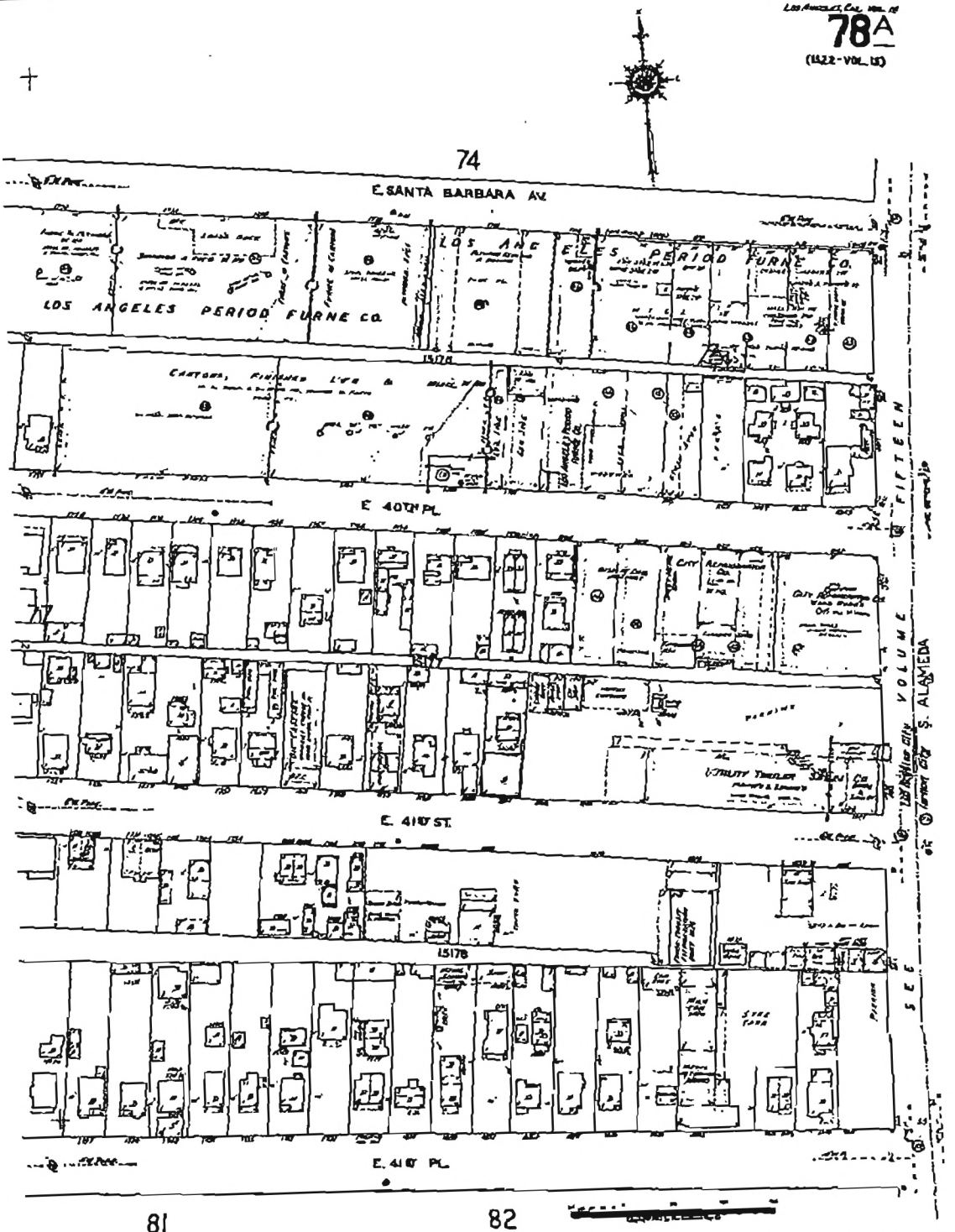


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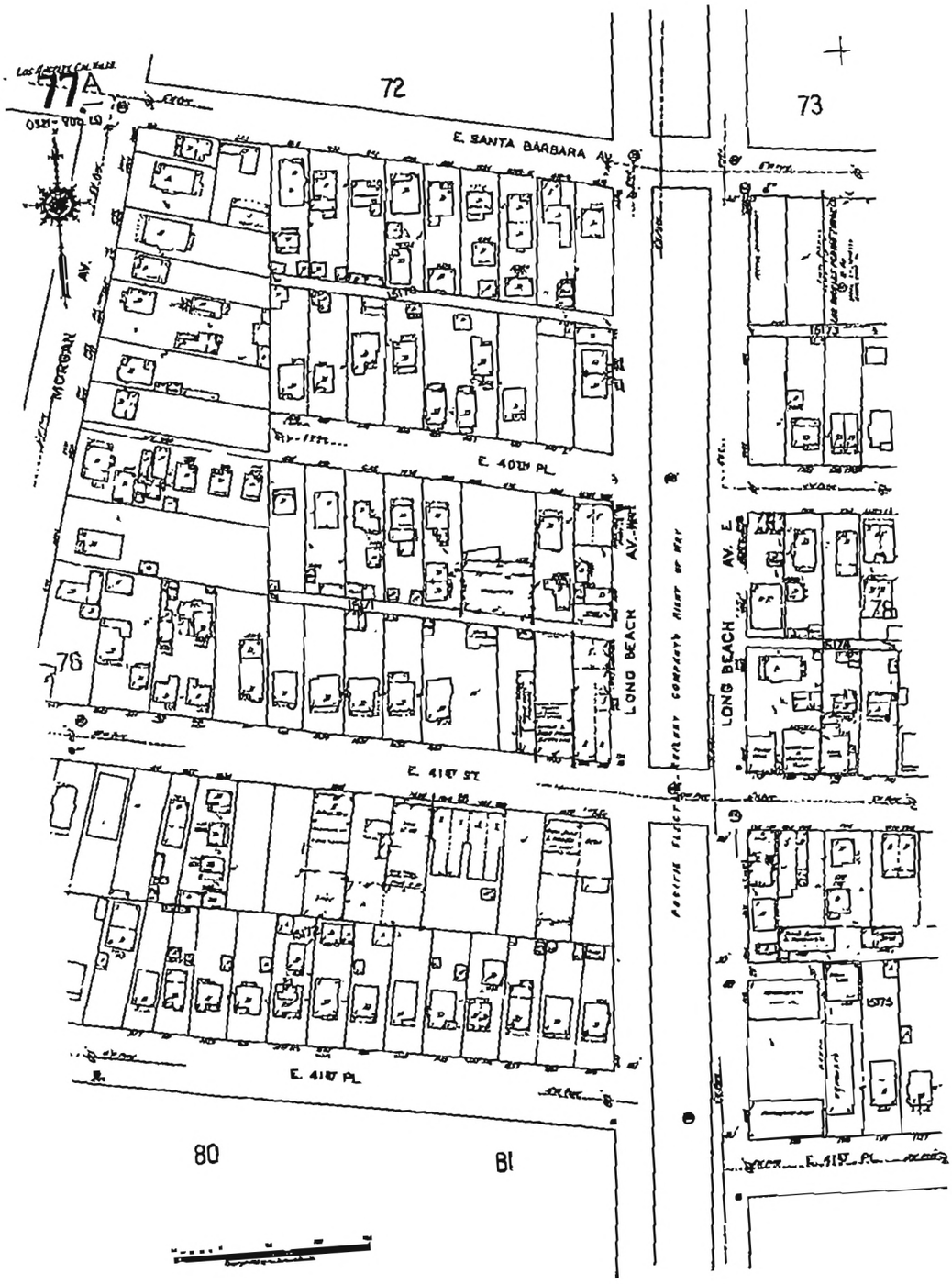


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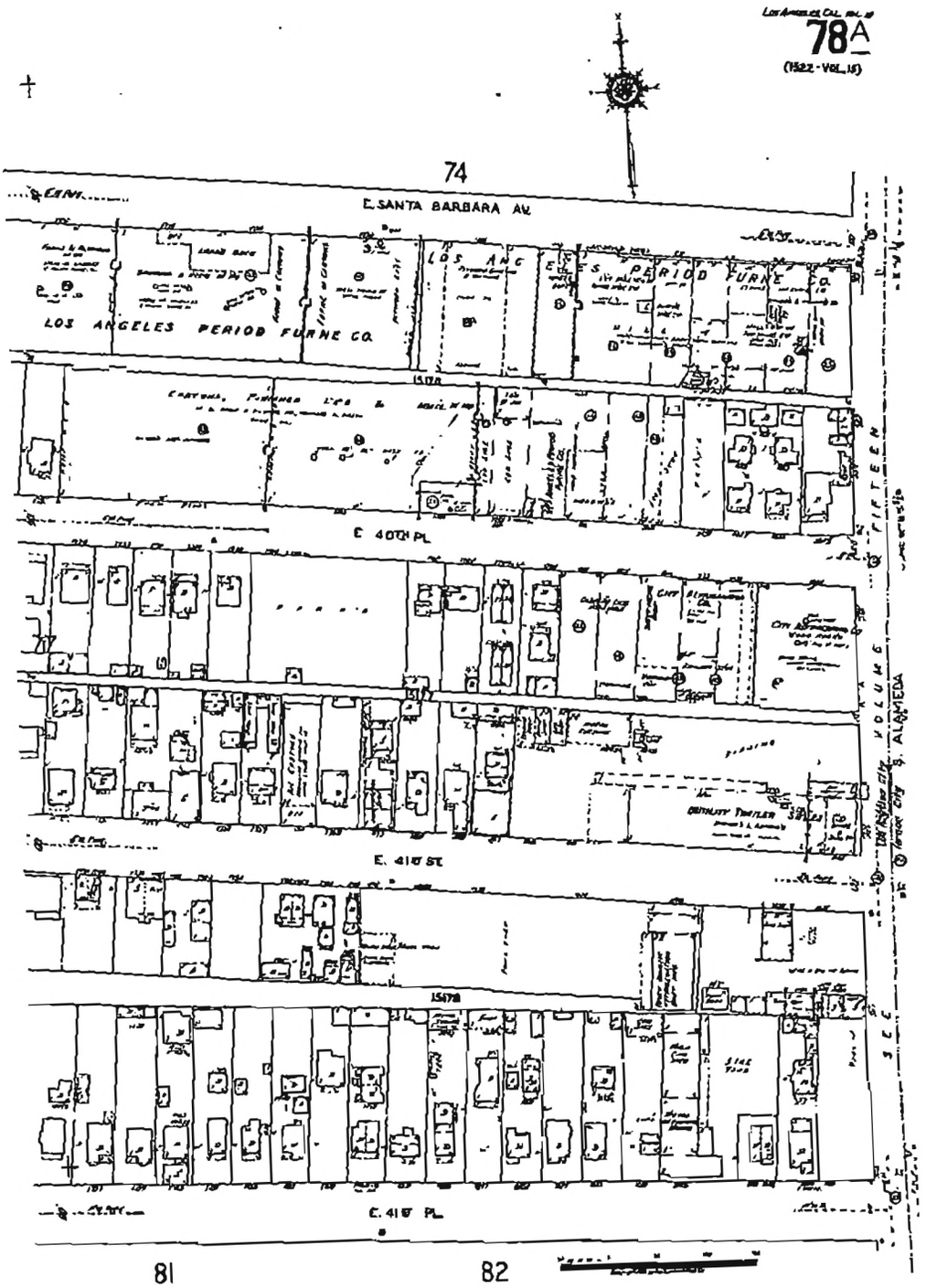
Los Angeles, Cal. Vol. 10
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(1922 - Vol. 10)



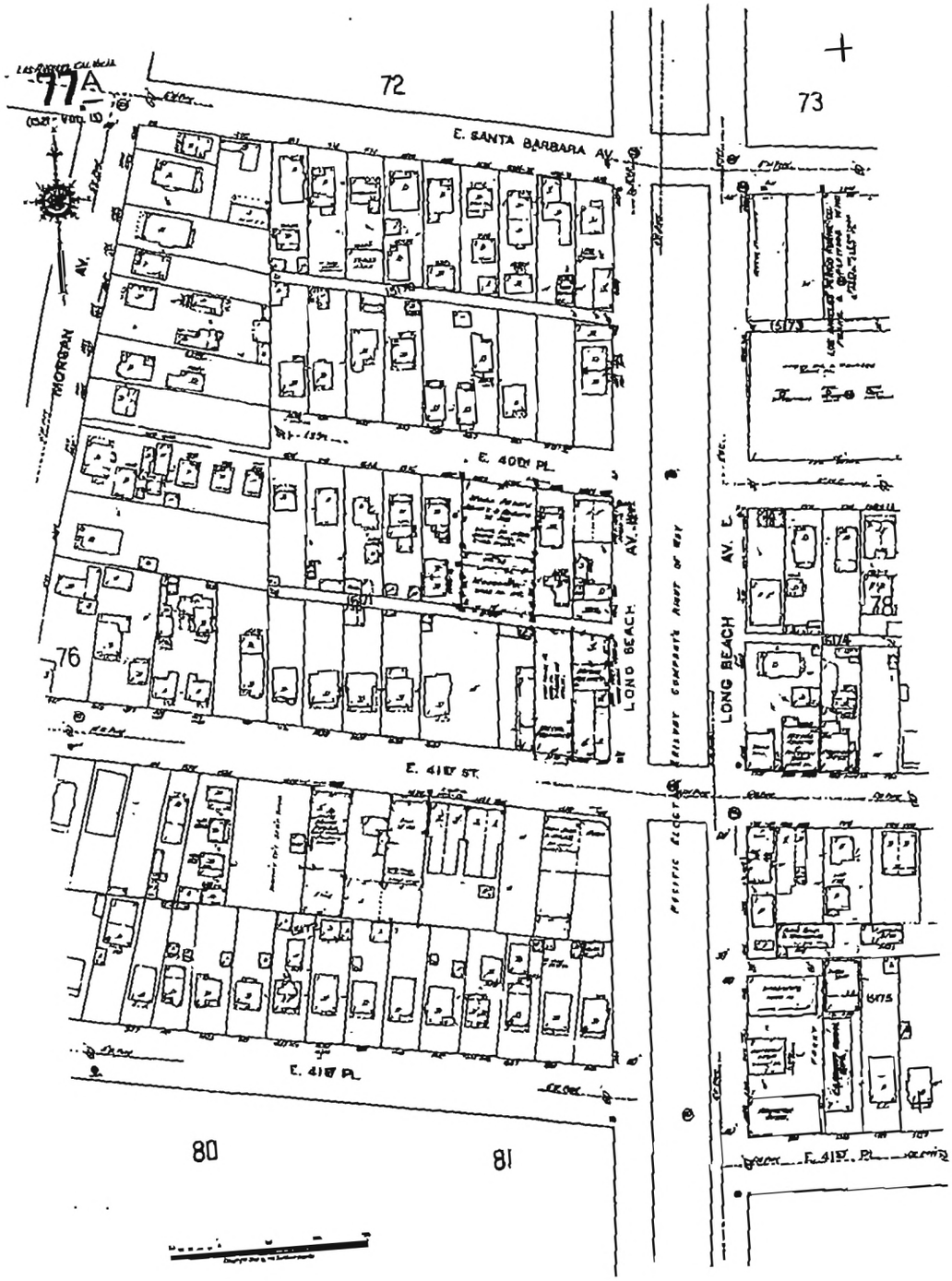
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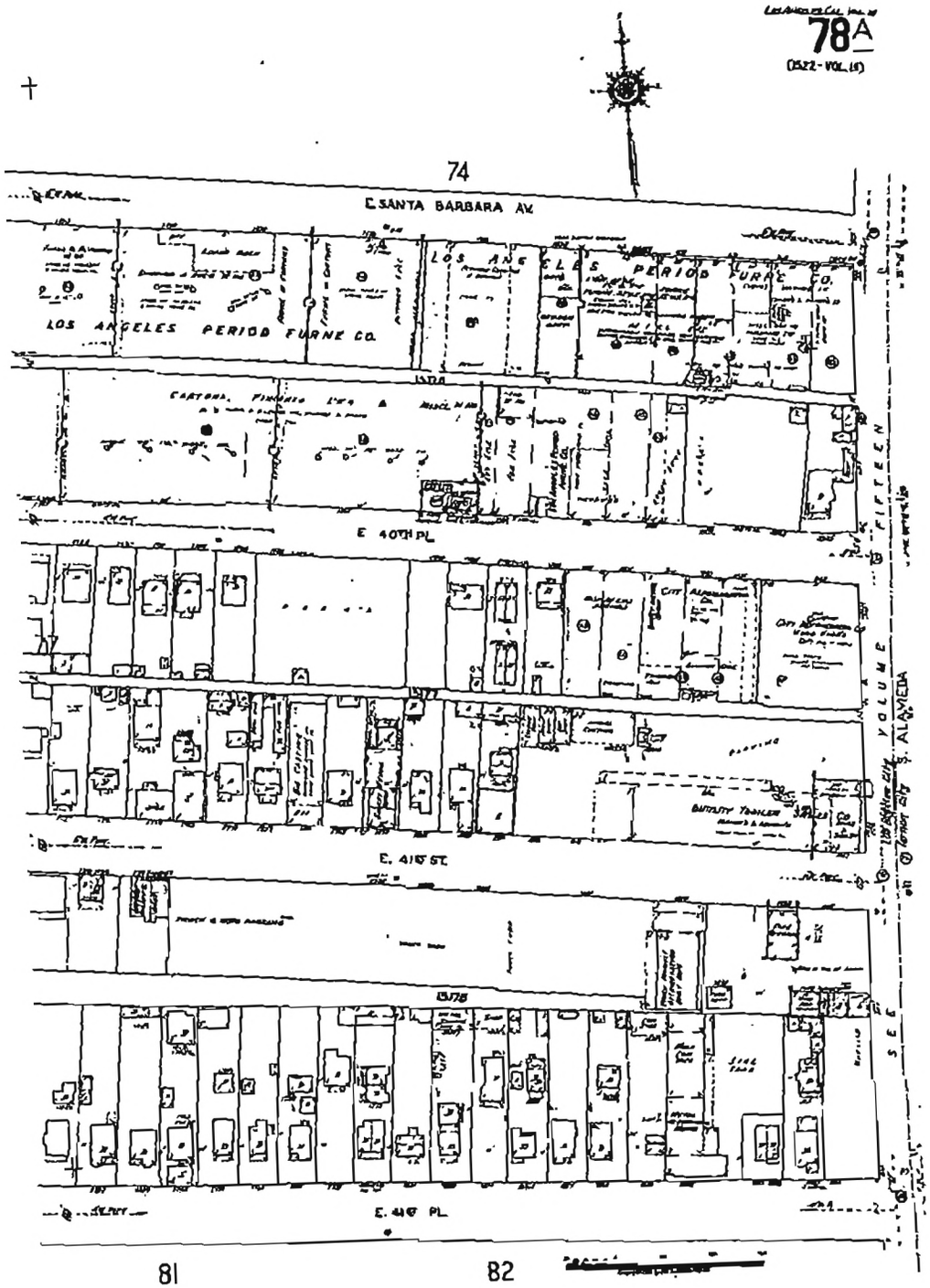
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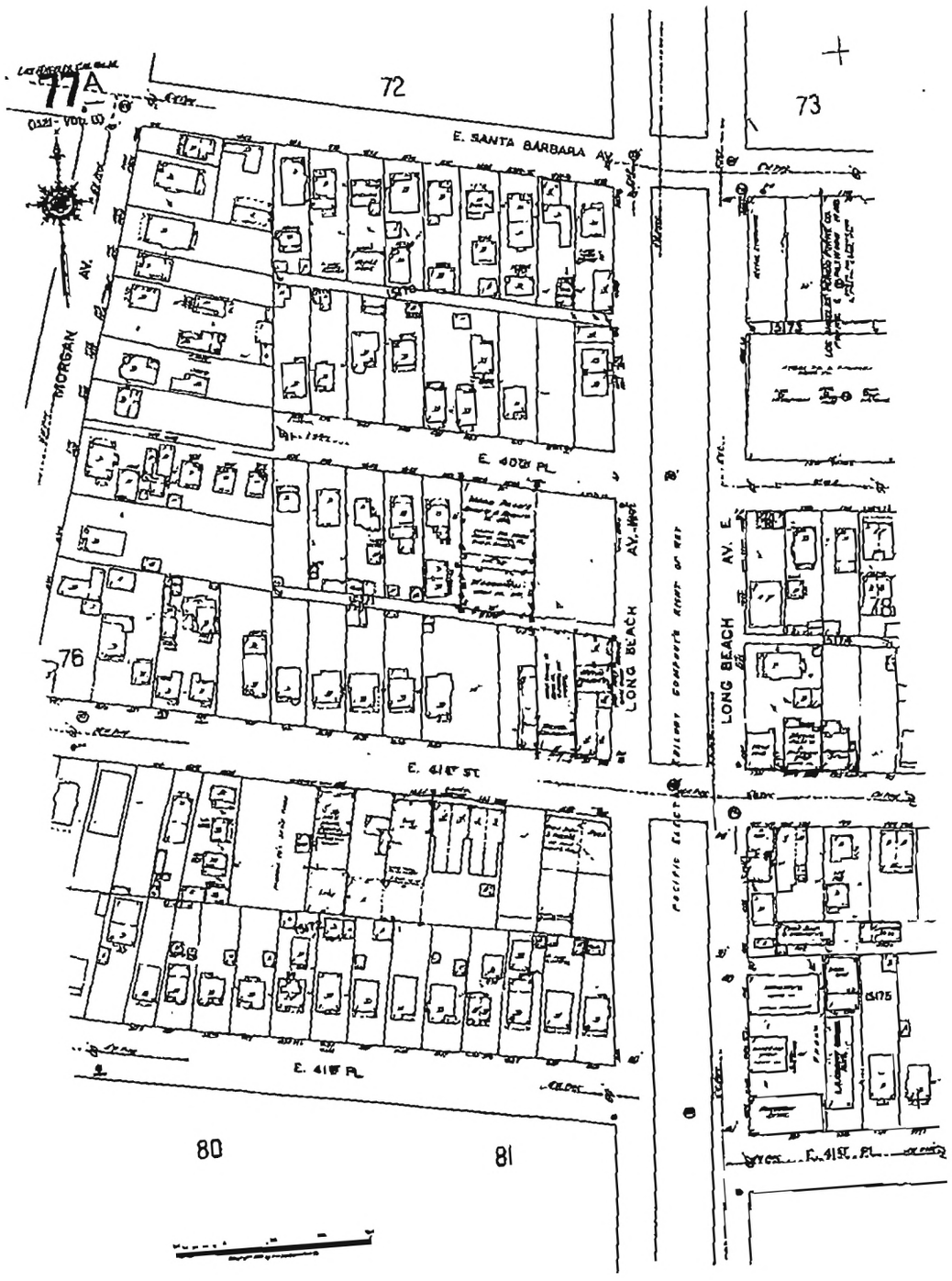
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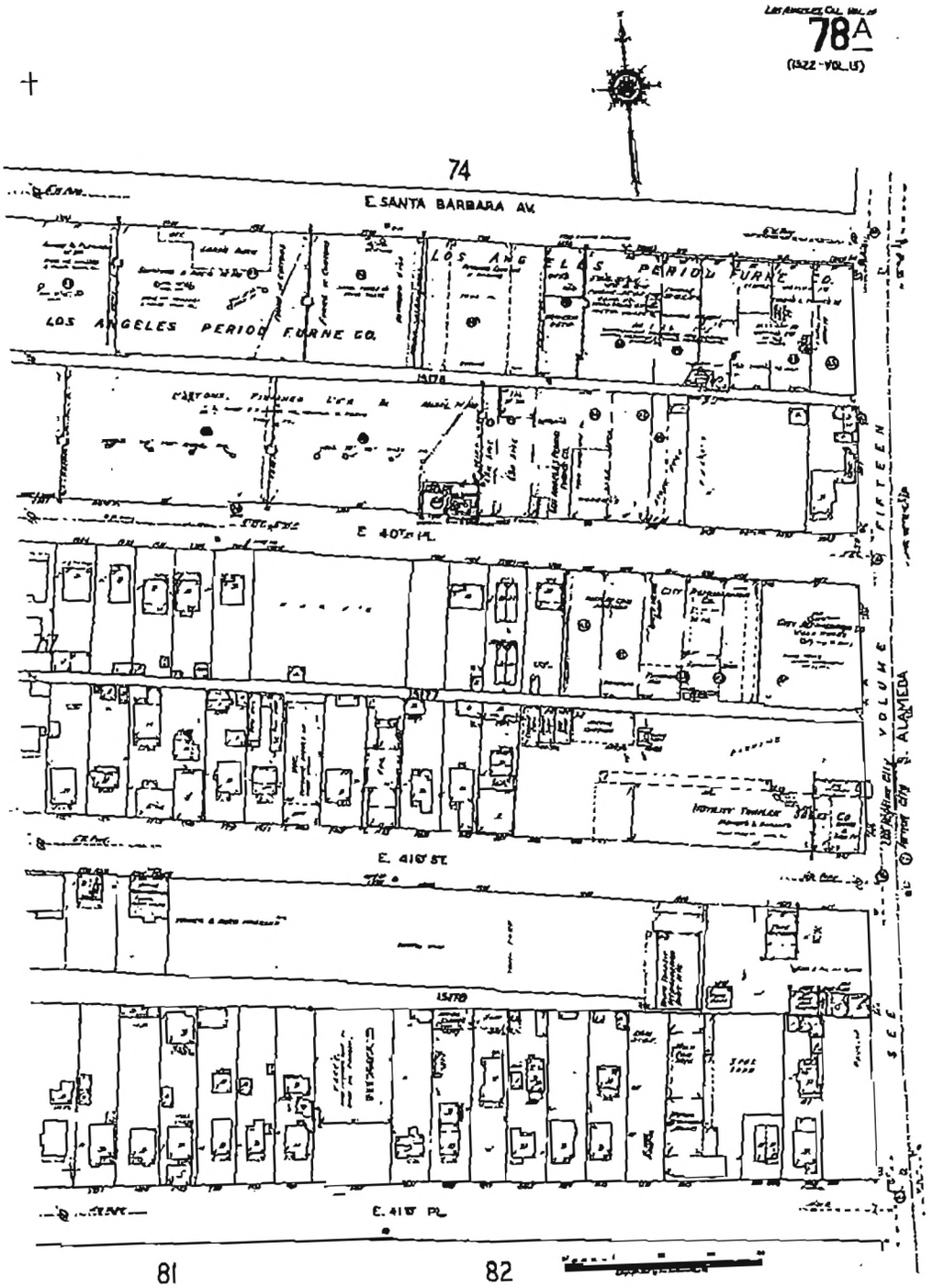
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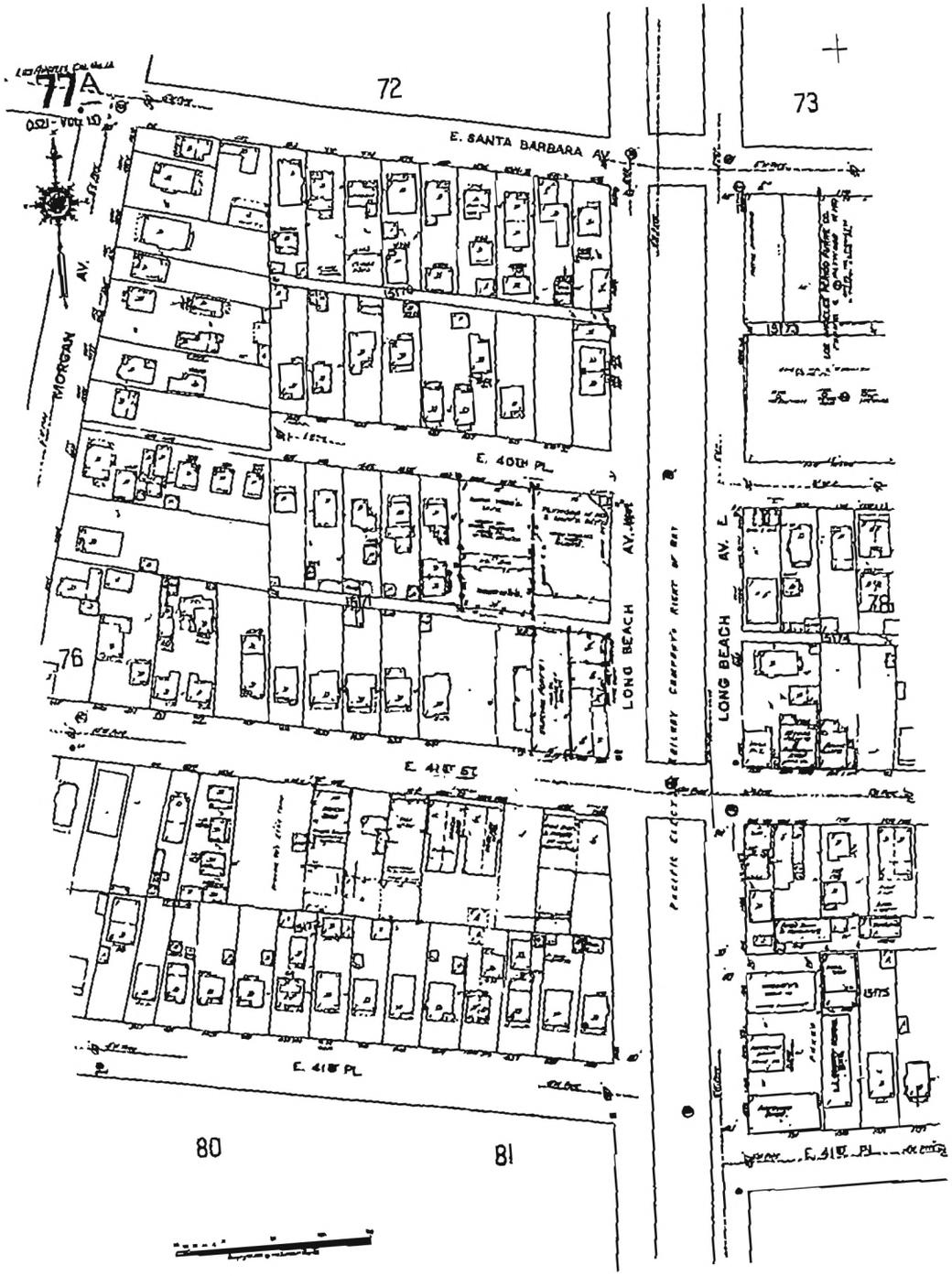
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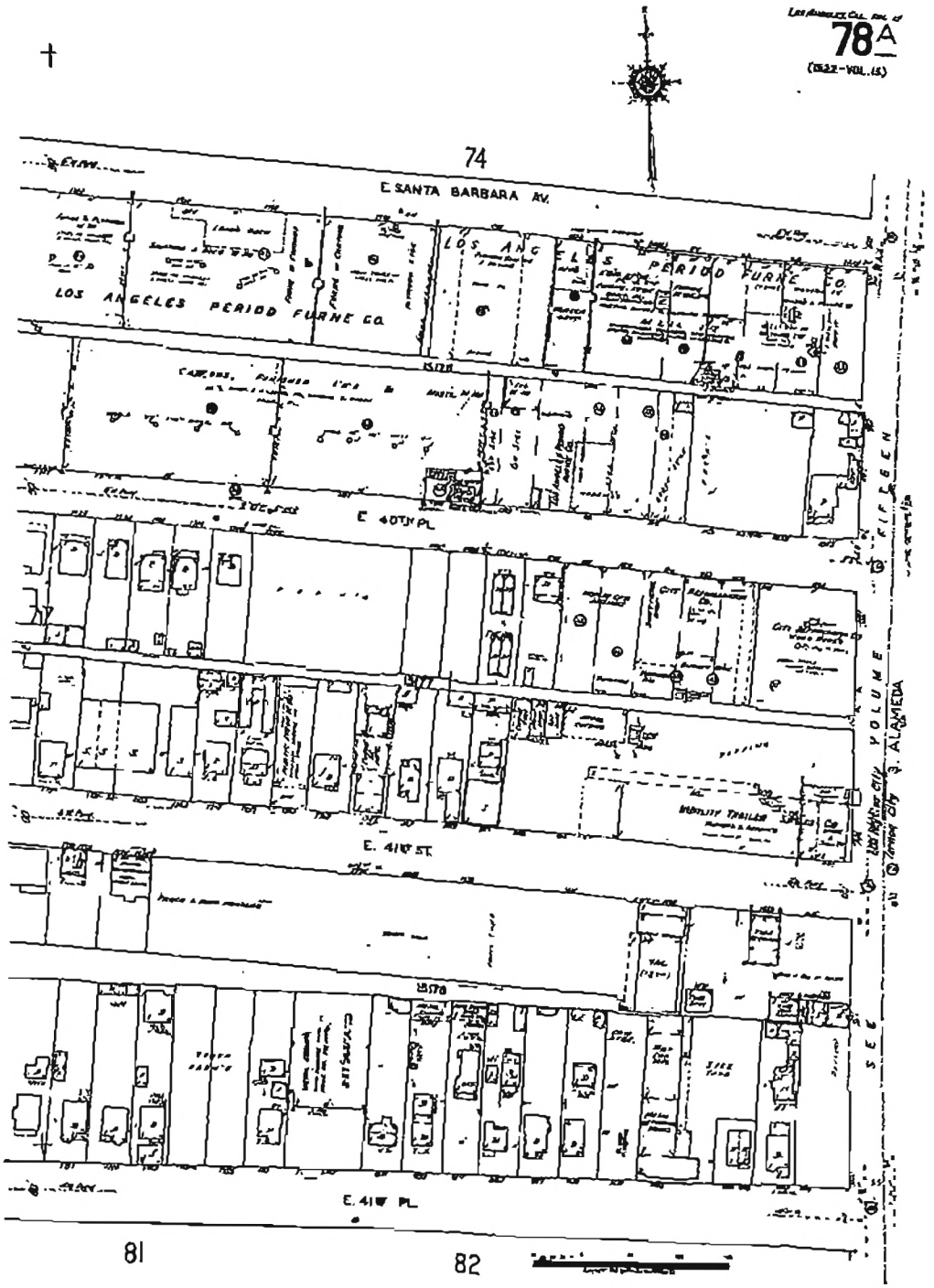
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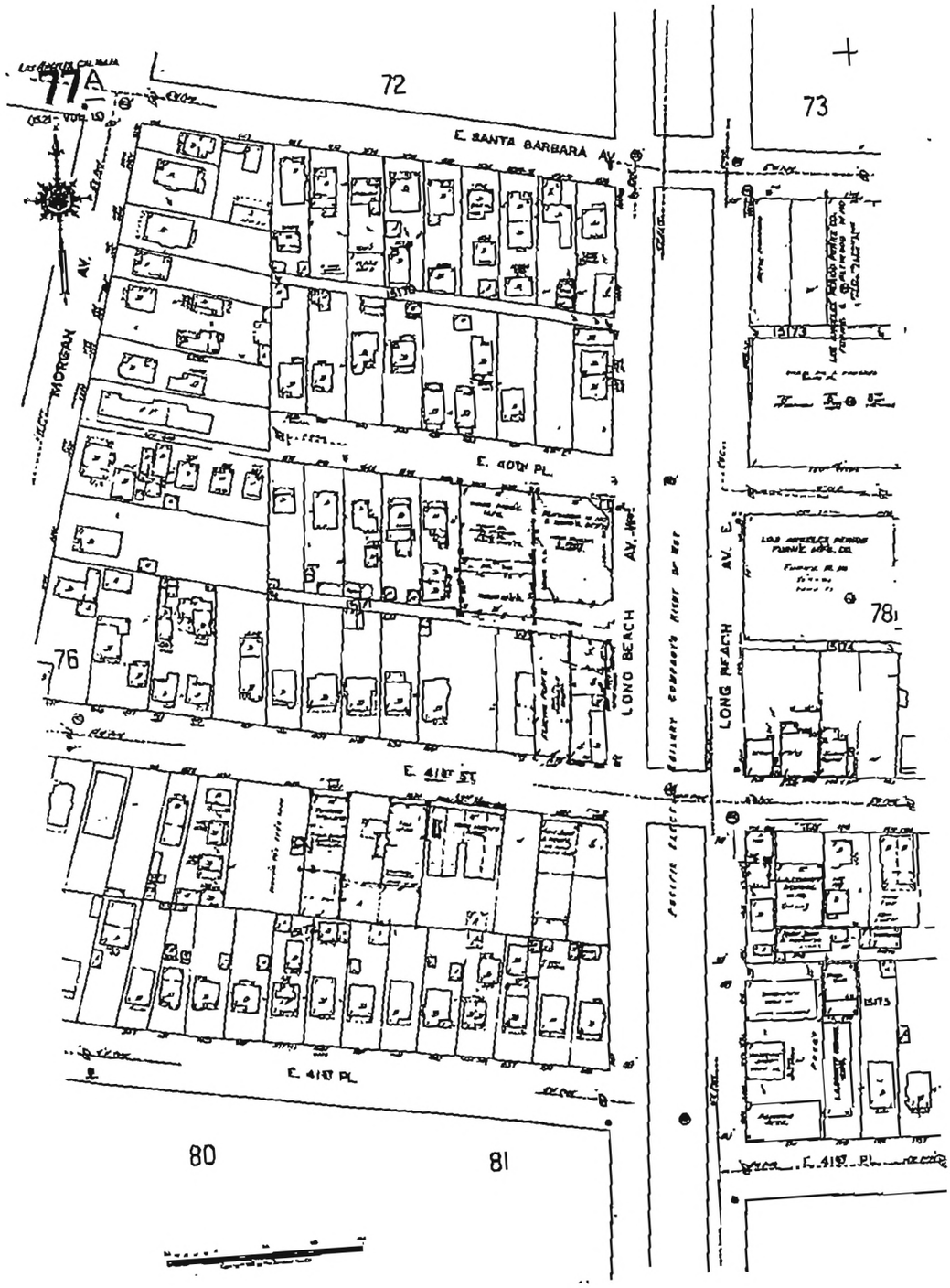
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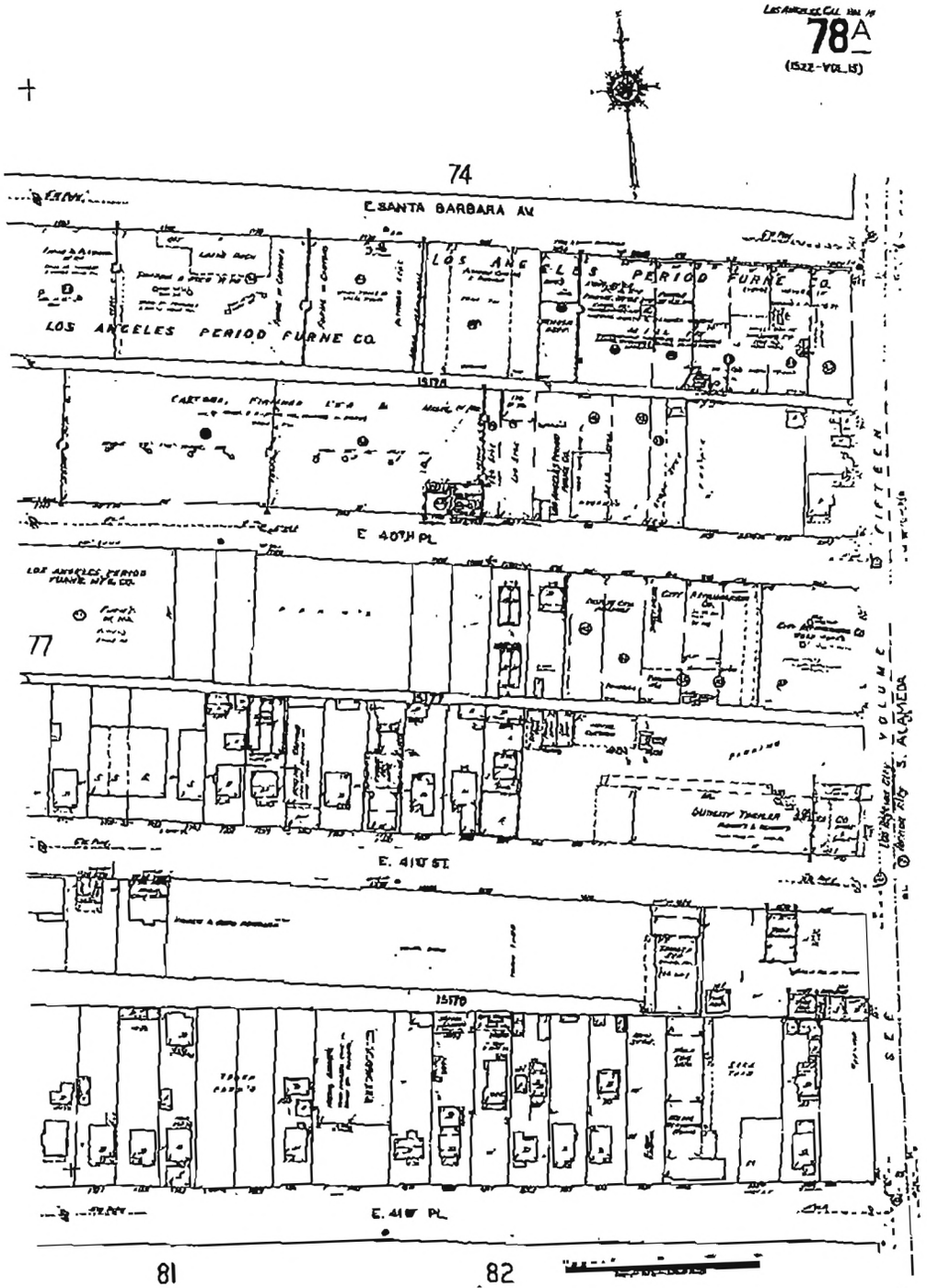
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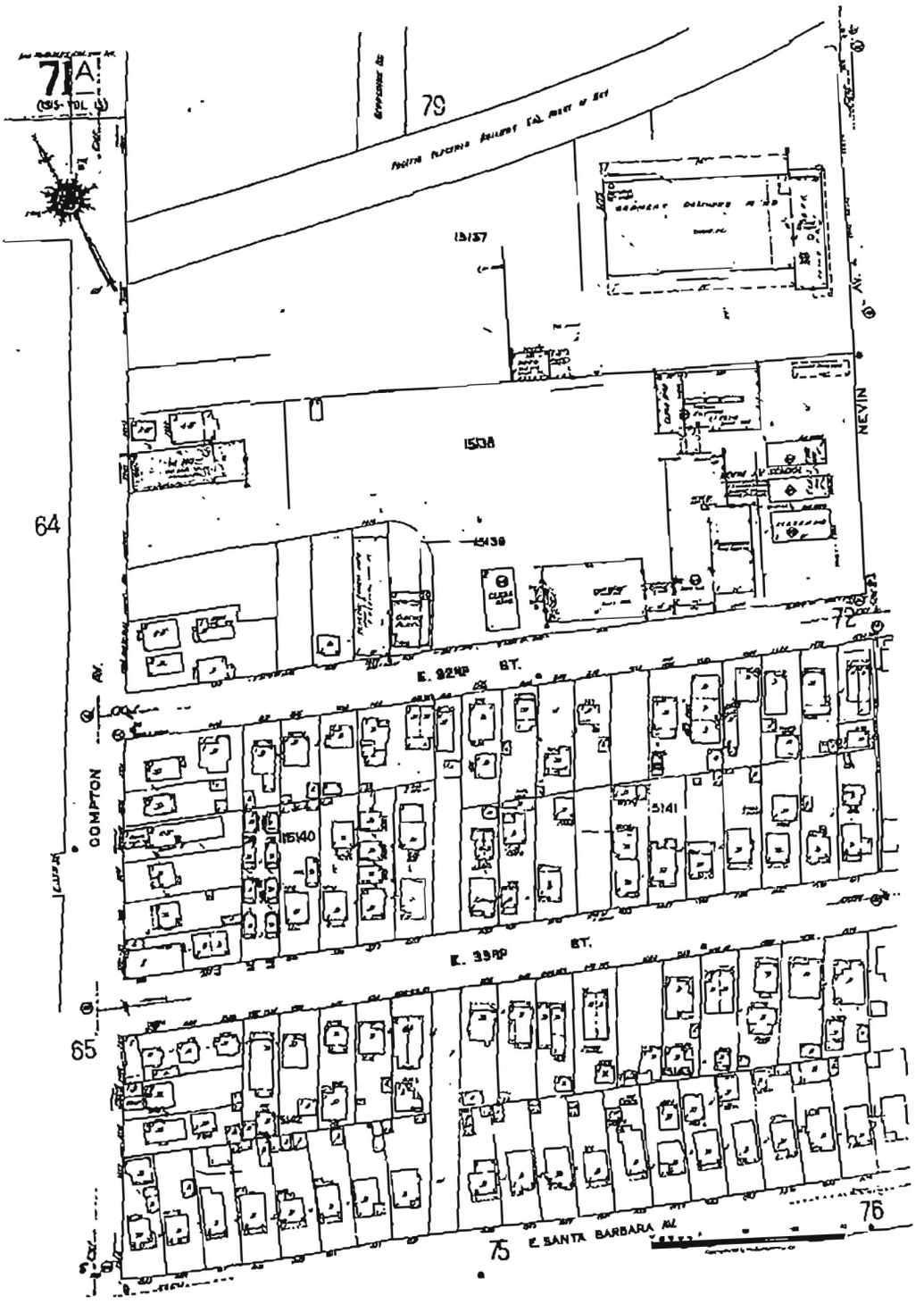
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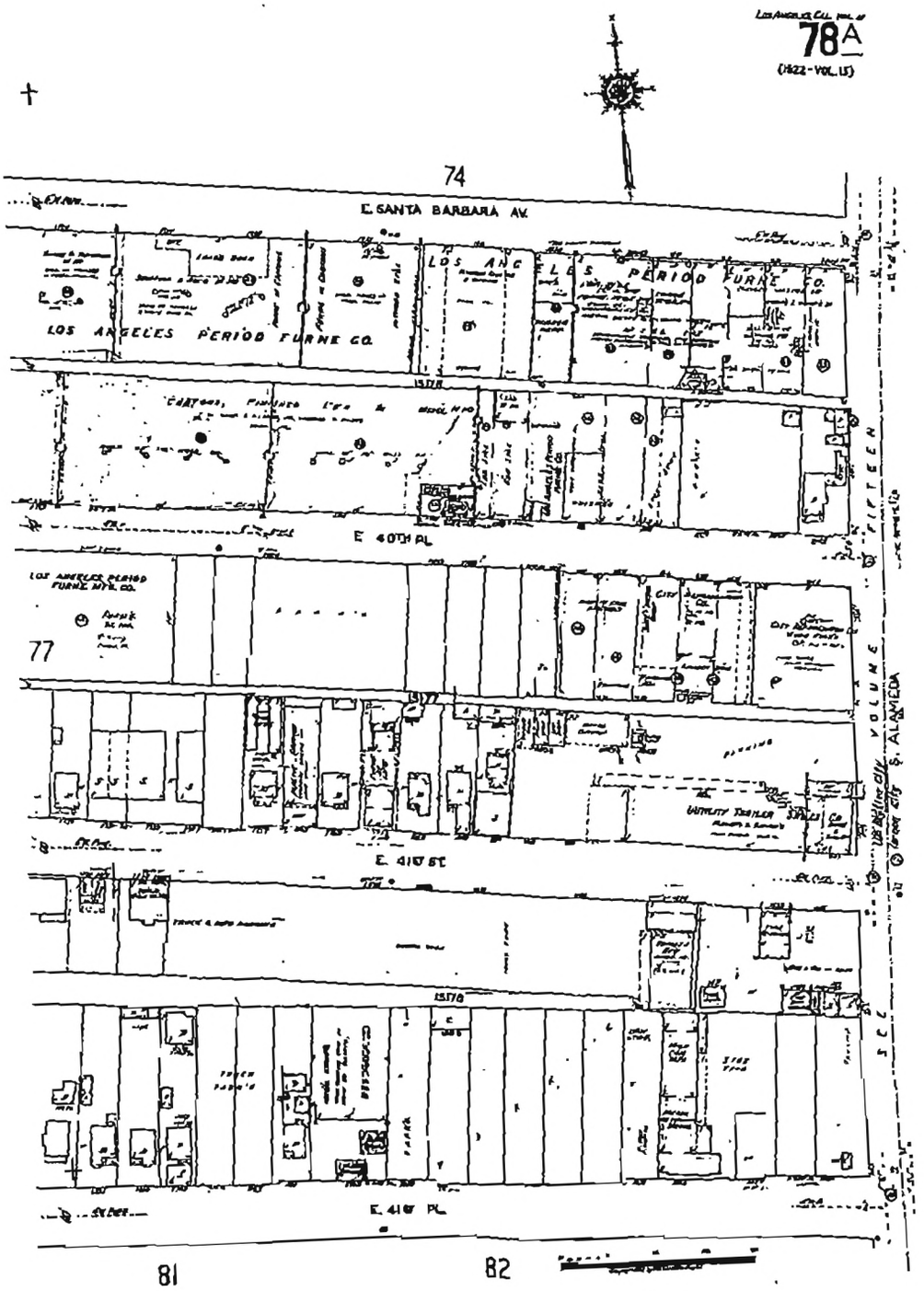
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APPENDIX F
CITY DIRECTORIES



EDR® Environmental
Data Resources Inc

The EDR-City Directory
Abstract

1720 E 40th Place
1720 E 40th Place
Los Angeles, CA 90058

Inquiry Number: 1659051.4

Thursday, April 20, 2006

The Standard in Environmental Risk Management Information

440 Wheelers Farms Road
Milford, Connecticut 06461

Nationwide Customer Service

Telephone: 1-800-352-0050
Fax: 1-800-231-6802
Internet: www.edrnet.com

APPENDIX C - REGULATORY DOCUMENTATION



EDR® Environmental
Data Resources Inc

The EDR Radius Map
with GeoCheck®

KEN-1
S Alameda Street/E 41St Street
Los Angeles, CA 90058

Inquiry Number: 1743456.2s

August 25, 2006

The Standard in Environmental Risk Management Information

440 Wheelers Farms Road
Milford, Connecticut 06461

Nationwide Customer Service

Telephone: 1-800-352-0050
Fax: 1-800-231-6802
Internet: www.edrnet.com

TABLE OF CONTENTS

SECTION	PAGE
Executive Summary	ES1
Overview Map	2
Detail Map	3
Map Findings Summary	4
Map Findings	6
Orphan Summary	137
Government Records Searched/Data Currency Tracking	GR-1

GEOCHECK ADDENDUM

Physical Setting Source Addendum	A-1
Physical Setting Source Summary	A-2
Physical Setting Source Map	A-7
Physical Setting Source Map Findings	A-8
Physical Setting Source Records Searched	A-21

Thank you for your business.
Please contact EDR at 1-800-352-0050
with any questions or comments.

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EXECUTIVE SUMMARY

A search of available environmental records was conducted by Environmental Data Resources, Inc (EDR). The report was designed to assist parties seeking to meet the search requirements of EPA's Standards and Practices for All Appropriate Inquiries (40 CFR Part 312), the ASTM Standard Practice for Environmental Site Assessments (E 1527-05) or custom requirements developed for the evaluation of environmental risk associated with a parcel of real estate.

TARGET PROPERTY INFORMATION

ADDRESS

S ALAMEDA STREET/E 41ST STREET
LOS ANGELES, CA 90058

COORDINATES

Latitude (North):	34.008400 - 34° 0' 30.2"
Longitude (West):	118.240200 - 118° 14' 24.7"
Universal Tranverse Mercator:	Zone 11
UTM X (Meters):	385475.5
UTM Y (Meters):	3763586.2
Elevation:	207 ft. above sea level

USGS TOPOGRAPHIC MAP ASSOCIATED WITH TARGET PROPERTY

Target Property Map:	34118-A2 LOS ANGELES, CA
Most Recent Revision:	1994
South Map:	33118-H2 SOUTH GATE, CA
Most Recent Revision:	1994
Southwest Map:	33118-H3 INGLEWOOD, CA
Most Recent Revision:	1994
West Map:	34118-A3 HOLLYWOOD, CA
Most Recent Revision:	1994

TARGET PROPERTY SEARCH RESULTS

The target property was not listed in any of the databases searched by EDR.

DATABASES WITH NO MAPPED SITES

No mapped sites were found in EDR's search of available ("reasonably ascertainable ") government records either on the target property or within the search radius around the target property for the following databases:

FEDERAL RECORDS

NPL ..... National Priority List

EXECUTIVE SUMMARY

Proposed NPL	Proposed National Priority List Sites
Delisted NPL	National Priority List Deletions
NPL RECOVERY	Federal Superfund Liens
CORRACTS	Corrective Action Report
RCRA-TSDF	Resource Conservation and Recovery Act Information
ERNS	Emergency Response Notification System
HMIRS	Hazardous Materials Information Reporting System
US ENG CONTROLS	Engineering Controls Sites List
US INST CONTROL	Sites with Institutional Controls
DOD	Department of Defense Sites
FUDS	Formerly Used Defense Sites
US BROWNFIELDS	A Listing of Brownfields Sites
CONSENT	Superfund (CERCLA) Consent Decrees
ROD	Records Of Decision
UMTRA	Uranium Mill Tailings Sites
ODI	Open Dump Inventory
TRIS	Toxic Chemical Release Inventory System
TSCA	Toxic Substances Control Act
FTTS	FIFRA/ TSCA Tracking System - FIFRA (Federal Insecticide, Fungicide, & Rodenticide Act)/TSCA (Toxic Substances Control Act)
SSTS	Section 7 Tracking Systems
ICIS	Integrated Compliance Information System
PADS	PCB Activity Database System
MLTS	Material Licensing Tracking System
MINES	Mines Master Index File
FINDS	Facility Index System/Facility Registry System
RAATS	RCRA Administrative Action Tracking System

STATE AND LOCAL RECORDS

CA BOND EXP. PLAN	Bond Expenditure Plan
SCH	School Property Evaluation Program
Toxic Pits	Toxic Pits Cleanup Act Sites
CA WDS	Waste Discharge System
SWRCY	Recycler Database
AOCONCERN	San Gabriel Valley Areas of Concern
AST	Aboveground Petroleum Storage Tank Facilities
CHMIRS	California Hazardous Material Incident Report System
Notify 65	Proposition 65 Records
LA Co. Site Mitigation	Site Mitigation List
DEED	Deed Restriction Listing
VCP	Voluntary Cleanup Program Properties
WIP	Well Investigation Program Case List
LOS ANGELES CO. HMS	HMS: Street Number List
CDL	Clandestine Drug Labs
HAZNET	Facility and Manifest Data
EMI	Emissions Inventory Data

TRIBAL RECORDS

INDIAN RESERV	Indian Reservations
INDIAN LUST	Leaking Underground Storage Tanks on Indian Land
INDIAN UST	Underground Storage Tanks on Indian Land

EDR PROPRIETARY RECORDS

Manufactured Gas Plants	EDR Proprietary Manufactured Gas Plants

EXECUTIVE SUMMARY

EDR Historical Auto StationsEDR Proprietary Historic Gas Stations

SURROUNDING SITES: SEARCH RESULTS

Surrounding sites were identified.

Elevations have been determined from the USGS Digital Elevation Model and should be evaluated on a relative (not an absolute) basis. Relative elevation information between sites of close proximity should be field verified. Sites with an elevation equal to or higher than the target property have been differentiated below from sites with an elevation lower than the target property.
Page numbers and map identification numbers refer to the EDR Radius Map report where detailed data on individual sites can be reviewed.

Sites listed in ***bold italics*** are in multiple databases.

Unmappable (orphan) sites are not considered in the foregoing analysis.

FEDERAL RECORDS

CERCLIS: The Comprehensive Environmental Response, Compensation and Liability Information System contains data on potentially hazardous waste sites that have been reported to the USEPA by states, municipalities, private companies and private persons, pursuant to Section 103 of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA). CERCLIS contains sites which are either proposed to or on the National Priorities List (NPL) and sites which are in the screening and assessment phase for possible inclusion on the NPL.

A review of the CERCLIS list, as provided by EDR, and dated 06/19/2006 has revealed that there is 1 CERCLIS site within approximately 0.5 miles of the target property.

Lower Elevation	Address	Dist / Dir	Map ID	Page
A A D DISPOSAL	***2306 38TH ST***	***1/4 - 1/2 E***	***S67***	***78***

CERCLIS-NFRAP: Archived sites are sites that have been removed and archived from the inventory of CERCLIS sites. Archived status indicates that, to the best of EPA's knowledge, assessment at a site has been completed and that EPA has determined no further steps will be taken to list this site on the National Priorities List (NPL), unless information indicates this decision was not appropriate or other considerations require a recommendation for listing at a later time. This decision does not necessarily mean that there is no hazard associated with a given site; it only means that, based upon available information, the location is not judged to be a potential NPL site.

A review of the CERC-NFRAP list, as provided by EDR, and dated 02/01/2006 has revealed that there is 1 CERC-NFRAP site within approximately 0.5 miles of the target property.

Equal/Higher Elevation	Address	Dist / Dir	Map ID	Page
RENU PLATING CORP	***1531 E 32ND ST***	***1/4 - 1/2 NW***	***P57***	***63***

EXECUTIVE SUMMARY

RCRAInfo: RCRAInfo is EPA's comprehensive information system, providing access to data supporting the Resource Conservation and Recovery Act (RCRA) of 1976 and the Hazardous and Solid Waste Amendments (HSWA) of 1984. RCRAInfo replaces the data recording and reporting abilities of the Resource Conservation and Recovery Information System(RCRIS). The database includes selective information on sites which generate, transport, store, treat and/or dispose of hazardous waste as defined by the Resource Conservation and Recovery Act (RCRA). Conditionally exempt small quantity generators (CESQGs) generate less than 100 kg of hazardous waste, or less than 1 kg of acutely hazardous waste per month. Small quantity generators (SQGs) generate between 100 kg and 1,000 kg of hazardous waste per month Large quantity generators generate over 1,000 kilograms (kg) of hazardous waste, or over 1 kg of acutely hazardous waste per month. Transporters are individuals or entities that move hazardous waste from the generator offsite to a facility that can recycle, treat, store, or dispose of the waste. TSDFs treat, store, or dispose of the waste.

A review of the RCRA-LQG list, as provided by EDR, and dated 06/13/2006 has revealed that there is 1 RCRA-LQG site within approximately 0.25 miles of the target property.

Equal/Higher Elevation	Address	Dist / Dir	Map ID	Page
NEVIN E S	*1569 E 32ND ST*	*1/8 - 1/4 NW*	*51*	*56*

RCRAInfo: RCRAInfo is EPA's comprehensive information system, providing access to data supporting the Resource Conservation and Recovery Act (RCRA) of 1976 and the Hazardous and Solid Waste Amendments (HSWA) of 1984. RCRAInfo replaces the data recording and reporting abilities of the Resource Conservation and Recovery Information System(RCRIS). The database includes selective information on sites which generate, transport, store , treat and/or dispose of hazardous waste as defined by the Resource Conservation and Recovery Act (RCRA). Conditionally exempt small quantity generators (CESQGs) generate less than 100 kg of hazardous waste, or less than 1 kg of acutely hazardous waste per month. Small quantity generators (SQGs) generate between 100 kg and 1,000 kg of hazardous waste per month Large quantity generators generate over 1,000 kilograms (kg) of hazardous waste, or over 1 kg of acutely hazardous waste per month. Transporters are individuals or entities that move hazardous waste from the generator offsite to a facility that can recycle, treat, store, or dispose of the waste. TSDFs treat, store, or dispose of the waste.

A review of the RCRA-SQG list, as provided by EDR, and dated 06/13/2006 has revealed that there are 14 RCRA-SQG sites within approximately 0.25 miles of the target property.

Equal/Higher Elevation	Address	Dist / Dir	Map ID	Page
UTILITY TRAILORS	*4073 S ALAMEDA ST*	*0 - 1/8*	*A2*	*6*
SINGER CO. LA PERIOD FURNITURE	*1838 EAST SANTA BARBARA*	*0 - 1/8*	*8*	*9*
OMEGA ENVIRONMENTAL SERVICES I	*1755 E MARTIN LUTHER KI*	*0 - 1/8*	*B12*	*10*
OLIN CORP OLIN WATER SERVICES	*3312 E LONG BEACH AVE*	*0 - 1/8 N*	*15*	*12*
LEARONAL	*2910 S ALAMEDA ST*	*1/8 - 1/4 N*	*I34*	*40*
DAP INC	*2121 E 37TH ST*	*1/8 - 1/4 E*	*35*	*40*
NATIONAL SERV IND SELIG CHEM I	*2840 S ALAMEDA*	*1/8 - 1/4 N*	*I37*	*41*
P&Y T SHIRT	*1844 E 27 ST*	*1/8 - 1/4 N*	*L44*	*47*

Lower Elevation	Address	Dist / Dir	Map ID	Page
WALTER MILLER EXPRESS CLEANER	*1835 E 41ST ST*	*0 - 1/8*	*4*	*7*
ALAMEDA PAINTING CO INC	*1714 E 41ST ST*	*0 - 1/8*	*9*	*9*
CEDERGREN RETINNING CO INC	*1845 E 41ST PL*	*0 - 1/8 S*	*E18*	*15*
BOGUSLAVSKY BORIS	*1842 E 41ST PLACE*	*0 - 1/8 S*	*E20*	*16*
WEST COAST BULLETS	*1871 E 42ND ST*	*1/8 - 1/4 S*	*G27*	*27*
SURE DELIVERY SERVICE INC	*1874 E 43RD ST*	*1/8 - 1/4 S*	*40*	*44*

EXECUTIVE SUMMARY

STATE AND LOCAL RECORDS

SWF/LF: The Solid Waste Facilities/Landfill Sites records typically contain an inventory of solid waste disposal facilities or landfills in a particular state. The data come from the Integrated Waste Management Board's Solid Waste Information System (SWIS) database.

A review of the SWF/LF list, as provided by EDR, and dated 06/12/2006 has revealed that there is 1 SWF/LF site within approximately 0.5 miles of the target property.

Lower Elevation	Address	Dist / Dir	Map ID	Page
AZTECA RUBBISH	1742 EAST 43RD STREET	1/8 - 1/4 S	K42	45

WMUDS/SWAT: The Waste Management Unit Database System is used for program tracking and inventory of waste management units. The source is the State Water Resources Control Board.

A review of the WMUDS/SWAT list, as provided by EDR, and dated 04/01/2000 has revealed that there is 1 WMUDS/SWAT site within approximately 0.5 miles of the target property.

Equal/Higher Elevation	Address	Dist / Dir	Map ID	Page
METRO-VERNON	SE OF ALAMEDA / 25TH	1/4 - 1/2 N	R65	77

CORTESE: This database identifies public drinking water wells with detectable levels of contamination, hazardous substance sites selected for remedial action, sites with known toxic material identified through the abandoned site assessment program, sites with USTs having a reportable release and all solid waste disposal facilities from which there is known migration. The source is the California Environmental Protection Agency/Office of Emergency Information.

A review of the Cortese list, as provided by EDR, and dated 04/01/2001 has revealed that there are 5 Cortese sites within approximately 0.5 miles of the target property.

Equal/Higher Elevation	Address	Dist / Dir	Map ID	Page
CRESCENT TRUCK LINES	***2910 ROSS ST***	***1/8 - 1/4 ENE***	***F25***	***23***
BOYS MARKET WAREHOUSE	***2652 LONG BEACH AVE W***	***1/4 - 1/2 N***	***54***	***58***
RENU PLATING COMPANY INC	1531 32ND	1/4 - 1/2 NW	P58	63
SOUTHWEST POLICE STATION 9/8-2	***1546 MARTIN LUTHER KING***	***1/4 - 1/2 WNW***	***60***	***68***

Lower Elevation	Address	Dist / Dir	Map ID	Page
WILLIAMS WAREHOUSE	1925 VERNON	1/4 - 1/2 SSE	O56	62

LUST: The Leaking Underground Storage Tank Incident Reports contain an inventory of reported leaking underground storage tank incidents. The data come from the State Water Resources Control Board Leaking Underground Storage Tank Information System.

A review of the LUST list, as provided by EDR, and dated 07/11/2006 has revealed that there are 4 LUST sites within approximately 0.5 miles of the target property.

Equal/Higher Elevation	Address	Dist / Dir	Map ID	Page
CRESCENT TRUCK LINES	***2910 ROSS ST***	***1/8 - 1/4 ENE***	***F25***	***23***
Facility Status: Case Closed				
BOYS MARKET WAREHOUSE	***2652 LONG BEACH AVE W***	***1/4 - 1/2 N***	***54***	***58***
Facility Status: Case Closed				

EXECUTIVE SUMMARY

Equal/Higher Elevation	Address	Dist / Dir	Map ID	Page
SOUTHWEST POLICE STATION 9/8-2	***1546 MARTIN LUTHER KING***	***1/4 - 1/2 WNW***	***60***	***68***
Facility Status: Leak being confirmed				

Lower Elevation	Address	Dist / Dir	Map ID	Page
WILLIAMS WAREHOUSE	1925 VERNON AVE E	1/4 - 1/2 SSE	O55	60
Facility Status: Case Closed				

CA FID: The Facility Inventory Database contains active and inactive underground storage tank locations. The source is the State Water Resource Control Board.

A review of the CA FID UST list, as provided by EDR, and dated 10/31/1994 has revealed that there are 9 CA FID UST sites within approximately 0.25 miles of the target property.

Equal/Higher Elevation	Address	Dist / Dir	Map ID	Page
KEN WESGARTH CONSTRUCTION	1755 E MARTIN LUTHER KI	0 - 1/8	B11	10
OLIN CORP OLIN WATER SERVICES	***3312 E LONG BEACH AVE***	***0 - 1/8 N***	***15***	***12***
HUGO NEU CORP/PROLER CORP	***2728 LONG BEACH AVE***	***1/8 - 1/4 N***	***N53***	***57***

Lower Elevation	Address	Dist / Dir	Map ID	Page
UTILITY TRAILER SALES COMPANY	***4101 S ALAMEDA ST***	***0 - 1/8***	***A14***	***11***
EMMDI INCORPORATED	***1862 E 41ST PL***	***0 - 1/8 S***	***E17***	***14***
CEDERGREEN REFINING COMPANY	***1845 E 41ST PL***	***0 - 1/8 S***	***E19***	***16***
UTILITY TRAILER SALES	***1769 E 41ST PL***	***0 - 1/8 S***	***21***	***17***
SOUTHLAND METALS	***1850 E 42ND ST***	***1/8 - 1/4 S***	***G28***	***28***
MOBIL SERVICE STATION VARTAN E	***4321 S ALAMEDA ST***	***1/8 - 1/4 S***	***M50***	***55***

CA SLIC: SLIC Region comes from the California Regional Water Quality Control Board.

A review of the SLIC list, as provided by EDR, and dated 07/11/2006 has revealed that there are 3 SLIC sites within approximately 0.5 miles of the target property.

Equal/Higher Elevation	Address	Dist / Dir	Map ID	Page
BORG-WARNER SECURITY CORP	***2901 SACO ST***	***1/4 - 1/2 E***	***Q62***	***72***
Facility Status: Case Open				
M-5 STEEL	2901 SACO	1/4 - 1/2 E	Q63	73
ACTA PARCEL MC-697 EAST	1830 25TH STREET, EAST	1/4 - 1/2 N	R66	78
Facility Status: Case Closed				

UST: The Underground Storage Tank database contains registered USTs. USTs are regulated under Subtitle I of the Resource Conservation and Recovery Act (RCRA). The data come from the State Water Resources Control Board's Hazardous Substance Storage Container Database.

A review of the UST list, as provided by EDR, and dated 07/11/2006 has revealed that there are 3 UST sites within approximately 0.25 miles of the target property.

Equal/Higher Elevation	Address	Dist / Dir	Map ID	Page
KEN WESGARTH CONSTRUCTION	1755 E MARTIN LUTHER KI	0 - 1/8	B7	8

Equal/Higher Elevation	Address	Dist / Dir	Map ID	Page
LA HARBOR DEPT	1786 E MARTIN LUTHER KI	0 - 1/8	C13	11
Lower Elevation	**Address**	**Dist / Dir**	**Map ID**	**Page**
VERNON FUEL DISTRIBUTIONINC.	4321 S ALAMEDA ST	1/8 - 1/4 S	M48	54

HIST UST: Historical UST Registered Database.

A review of the HIST UST list, as provided by EDR, and dated 10/15/1990 has revealed that there are 12 HIST UST sites within approximately 0.25 miles of the target property.

Equal/Higher Elevation	Address	Dist / Dir	Map ID	Page
REEDER FASTWAY TRUCKING	***2043 ROSS ST***	***0 - 1/8 NE***	***D22***	***18***
LOS ANGELES BY PRODUCTS	***2065 ROSS ST***	***0 - 1/8 ENE***	***24***	***21***
CRESCENT TRUCK LINES (TRUCKING	2910 ROSS ST	1/8 - 1/4 ENE	F26	27
SHEFFIELD FURNITURE CORP.	***2100 E 38TH ST***	***1/8 - 1/4 E***	***30***	***32***
BILL'S TRUCKING INC	3575 ROSS ST	1/8 - 1/4 E	H31	36
BERKOFF'S ROASTING MILL	2110 E 37TH ST	1/8 - 1/4 E	H33	39
ALAMEDA	***1862 E 27TH ST***	***1/8 - 1/4 NNE***	***L46***	***51***
DOWNTOWN METAL CENTER	2728 LONG BEACH AVE	1/8 - 1/4 N	N52	57
Lower Elevation	**Address**	**Dist / Dir**	**Map ID**	**Page**
VERNON WAREHOUSE COMPANY	***2050 E 38TH ST***	***0 - 1/8 E***	***23***	***19***
EVER-FRESH FOODS COMPANY	4200 S ALAMEDA ST	1/8 - 1/4 S	J38	42
JIM'S ARCO STATION	4321 S ALAMEDA ST	1/8 - 1/4 S	M47	52
JIM'S ARCO	4321 S ALAMEDA ST	1/8 - 1/4 S	M49	54

SWEEPS: Statewide Environmental Evaluation and Planning System. This underground storage tank listing was updated and maintained by a company contacted by the SWRCB in the early 1980's. The listing is no longer updated or maintained. The local agency is the contact for more information on a site on the SWEEPS list.

A review of the SWEEPS UST list, as provided by EDR, and dated 06/01/1994 has revealed that there are 20 SWEEPS UST sites within approximately 0.25 miles of the target property.

Equal/Higher Elevation	Address	Dist / Dir	Map ID	Page
OLIN CORP OLIN WATER SERVICES	***3312 E LONG BEACH AVE***	***0 - 1/8 N***	***15***	***12***
AVON TRANSPORT	***2030 ROSS ST***	***0 - 1/8 NE***	***D16***	***13***
REEDER FASTWAY TRUCKING	***2043 ROSS ST***	***0 - 1/8 NE***	***D22***	***18***
LOS ANGELES BY PRODUCTS	***2065 ROSS ST***	***0 - 1/8 ENE***	***24***	***21***
CRESCENT TRUCK LINES	***2910 ROSS ST***	***1/8 - 1/4 ENE***	***F25***	***23***
T C I LEASING	***2920 ROSS ST***	***1/8 - 1/4 ENE***	***F29***	***28***
SHEFFIELD FURNITURE CORP.	***2100 E 38TH ST***	***1/8 - 1/4 E***	***30***	***32***
VECTA TRANSPORTATION SYSTEM	***3575 ROSS ST***	***1/8 - 1/4 E***	***H32***	***36***
L.A. BY-PRODUCTS CO.	2860 ALAMEDA ST	1/8 - 1/4 N	I36	41
CATALINA PACIFIC CONCRETE	1862 E 27TH ST	1/8 - 1/4 NNE	L45	47
HUGO NEU CORP/PROLER CORP	***2728 LONG BEACH AVE***	***1/8 - 1/4 N***	***N53***	***57***
Lower Elevation	**Address**	**Dist / Dir**	**Map ID**	**Page**
UTILITY TRAILER CO CORP	1801 E 41ST ST	0 - 1/8	5	8
UTILITY TRAILER SALES COMPANY	***4101 S ALAMEDA ST***	***0 - 1/8***	***A14***	***11***

Lower Elevation	Address	Dist / Dir	Map ID	Page
EMMDI INCORPORATED	*1862 E 41ST PL*	*0 - 1/8 S*	*E17*	*14*
CEDERGREEN REFINING COMPANY	*1845 E 41ST PL*	*0 - 1/8 S*	*E19*	*16*
UTILITY TRAILER SALES	*1769 E 41ST PL*	*0 - 1/8 S*	*21*	*17*
VERNON WAREHOUSE COMPANY	*2050 E 38TH ST*	*0 - 1/8 E*	*23*	*19*
SOUTHLAND METALS	*1850 E 42ND ST*	*1/8 - 1/4 S*	*G28*	*28*
DAIRY FRESH PRODUCTS CO.	4200 ALAMEDA ST	1/8 - 1/4 S	J39	43
MOBIL SERVICE STATION VARTAN E	*4321 S ALAMEDA ST*	*1/8 - 1/4 S*	*M50*	*55*

DRYCLEANERS: A list of drycleaner related facilities that have EPA ID numbers. These, are facilities with certain SIC codes: power laundries, family and commercial; garment pressing and cleaners' agents; linen supply; coin-operated laundries and cleaning; drycleaning plants except rugs; carpet and upholster cleaning; industrial launderers; laundry and garment services.

A review of the CLEANERS list, as provided by EDR, and dated 04/18/2005 has revealed that there are 2 CLEANERS sites within approximately 0.25 miles of the target property.

Lower Elevation	Address	Dist / Dir	Map ID	Page
WALTER MILLER EXPRESS CLEANER	*1835 E 41ST ST*	*0 - 1/8*	*4*	*7*
WESTERN TRUCK & TRAILER	1839 E 43RD ST	1/8 - 1/4 S	41	45

RESPONSE: Identifies confirmed release sites where DTSC is involved in remediation, either in a lead or oversight capacity. These confirmed release sites are generally high-priority and high potential risk.

A review of the RESPONSE list, as provided by EDR, and dated 06/06/2006 has revealed that there are 3 RESPONSE sites within approximately 1 mile of the target property.

Equal/Higher Elevation	Address	Dist / Dir	Map ID	Page
RENU PLATING COMPANY INC	*1531 EAST 32ND STREET*	*1/4 - 1/2 NW*	*P59*	*64*
AMTRAK	*2435 E WASHINGTON BLVD*	*1/2 - 1 NE*	*U82*	*114*
Lower Elevation	**Address**	**Dist / Dir**	**Map ID**	**Page**
AAD	*2306 E. 38TH STREET*	*1/4 - 1/2 E*	*S68*	*82*

ENVIROSTOR: The Department of Toxic Substances Control's (DTSC's) Site Mitigation and Brownfields Reuse Program's (SMBRP's) EnviroStor database identifes sites that have known contamination or sites for which there may be reasons to investigate further. The database includes the following site types: Federal Superfund sites (National Priorities List (NPL)); State Response, including Military Facilities and State Superfund; Voluntary Cleanup; and School sites. EnviroStor provides similar information to the information that was available in CalSites, and provides additional site information, including, but not limited to, identification of formerly-contaminated properties that have been released for reuse, properties where environmental deed restrictions have been recorded to prevent inappropriate land uses, and risk characterization information that is used to assess potential impacts to public health and the environment at contaminated sites.

A review of the ENVIROSTOR list, as provided by EDR, and dated 05/10/2006 has revealed that there are 24 ENVIROSTOR sites within approximately 1 mile of the target property.

Equal/Higher Elevation	Address	Dist / Dir	Map ID	Page
RENU PLATING COMPANY INC	*1531 EAST 32ND STREET*	*1/4 - 1/2 NW*	*P59*	*64*

EXECUTIVE SUMMARY

Equal/Higher Elevation	Address	Dist / Dir	Map ID	Page
M-5 STEEL, INC.	2901-2921 SACO STREET	1/4 - 1/2 E	Q61	70
NEVIN AVENUE ELEMENTARY SCHOOL	***1517 EAST 32ND STREET***	***1/4 - 1/2 NW***	***64***	***74***
TELEDYNE WESTERN WIRE AND CABL	2425 EAST 30TH STREET	1/2 - 1 E	70	87
JEFFERSON CONTINUATION HIGH SC	***33RD STREET/HOOPER AVEN***	***1/2 - 1 WNW***	***71***	***88***
FIRST NATIONWIDE BANK	2309/2311 SOUTH SANTA F	1/2 - 1 NE	72	90
KELLOGG OIL COMPANY	2465 EAST 25TH STREET	1/2 - 1 ENE	73	92
CITY NATIONAL BANK	***2209 SOUTH SANTA FE AVE***	***1/2 - 1 NE***	***74***	***93***
ABEGG AND REINHOLD COMPANY	2533 EAST 26TH STREET	1/2 - 1 ENE	75	97
BARDCO MANUFACTURING & SALES C	2450 EAST 23RD STREET	1/2 - 1 NE	T76	98
INDUSTRIAL WIRE PRODUCTS CORPO	***2451 EAST 23RD STREET***	***1/2 - 1 NE***	***T77***	***100***
FISHKING PROCESSORS/COMPTON AV	***1640 COMPTON AVE***	***1/2 - 1 N***	***78***	***101***
ALAMEDA CORRIDOR-SALE PARCEL 4	***2425 E WASHINGTON BLVD***	***1/2 - 1 NE***	***U79***	***104***
LOS ANGELES CRA-SALE PARCEL 49	***2429 EAST WASHINGTON BL***	***1/2 - 1 NE***	***U80***	***108***
PACIFIC ALLIED MANUFACTURING C	2911 SOUTH CENTRAL AVEN	1/2 - 1 WNW	81	113
AMTRAK	***2435 E WASHINGTON BLVD***	***1/2 - 1 NE***	***U82***	***114***
SHELMAC CORPORATION	***1440 E. WALNUT ST.***	***1/2 - 1 NNW***	***83***	***123***
FORMER GAP PRODUCTS SITE	***1460 EAST WASHINGTON BO***	***1/2 - 1 NNW***	***84***	***125***
BIKE SHOP	***5201 SOUTH COMPTON AVEN***	***1/2 - 1 SSW***	***85***	***128***
SWIFT ADHESIVES AND COATINGS	***3760 JEWELL AVE***	***1/2 - 1 E***	***87***	***132***
JEFFERSON HOOPER PRIMARY SCHOO	***52ND STREET/HOOPER AVEN***	***1/2 - 1 SSW***	***88***	***134***

Lower Elevation	Address	Dist / Dir	Map ID	Page
AAD	***2306 E. 38TH STREET***	***1/4 - 1/2 E***	***S68***	***82***
EDISON/VERNON	2323 EAST VERNON AVENUE	1/2 - 1 ESE	69	85
CHAMPION ARMATURE CORPORATION	4632-4642 PACIFIC BOULE	1/2 - 1 ESE	86	130

EDR PROPRIETARY RECORDS

EDR Historical Cleaners: EDR has searched selected national collections of business directories and has collected listings of potential dry cleaner sites that were available to EDR researchers. EDR's review was limited to those categories of sources that might, in EDR's opinion, include dry cleaning establishments. The categories reviewed included, but were not limited to dry cleaners, cleaners, laundry, laundromat, cleaning/laundry, wash & dry etc.

A review of the EDR Historical Cleaners list, as provided by EDR, has revealed that there is 1 EDR Historical Cleaners site within approximately 0.25 miles of the target property.

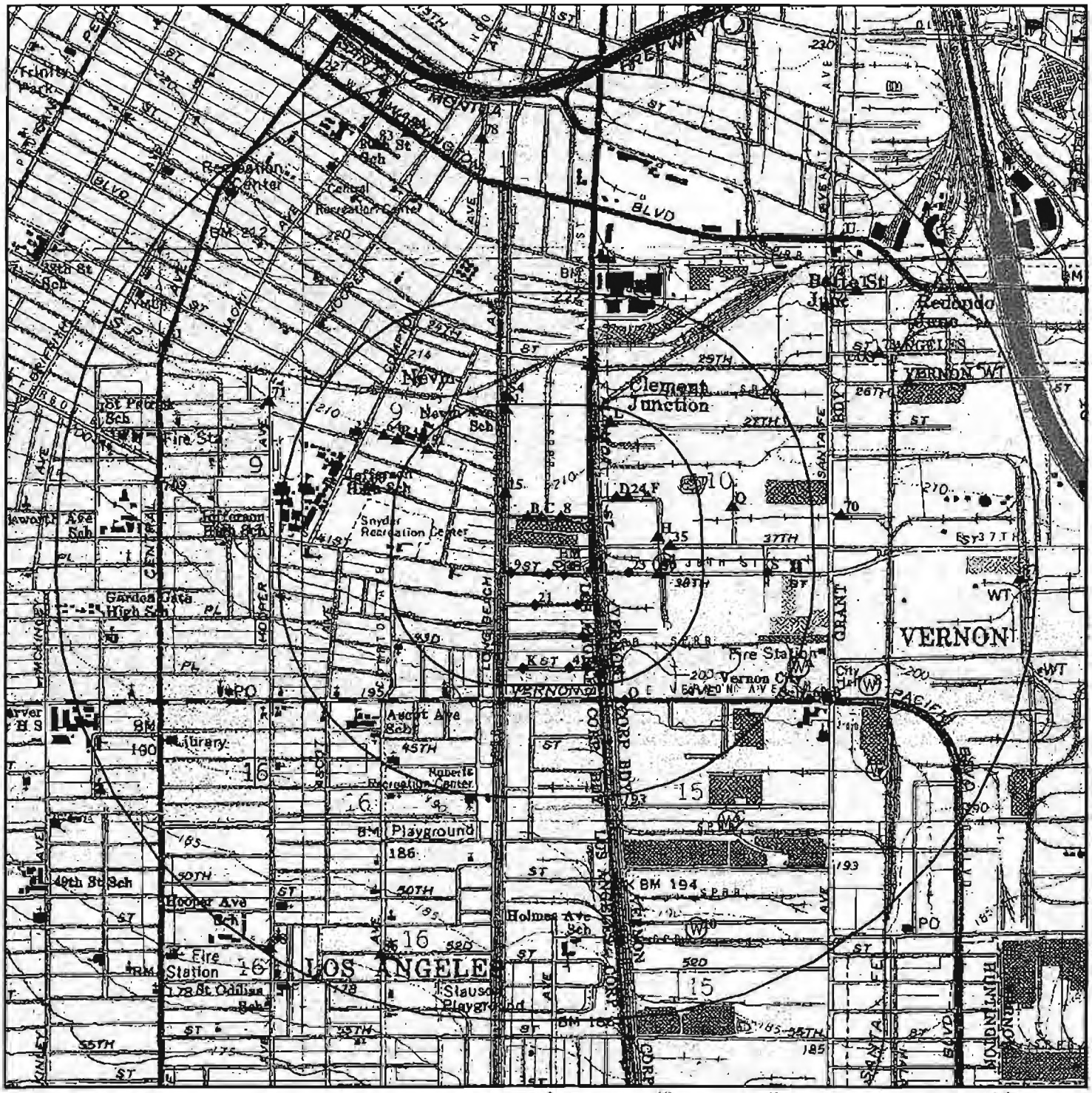
Lower Elevation	Address	Dist / Dir	Map ID	Page
KROMBACH A C	1748 E 43D	1/8 - 1/4 S	K43	47

EXECUTIVE SUMMARY

Due to poor or inadequate address information, the following sites were not mapped:

Site Name	Database(s)
AAD DISTRIBUTION & DRY CLEANING SERVICES	RCRA-LQG, RCRA-TSDF, CORRACTS
ENG LAUNDRY AND CLEANER CTR	CLEANERS
2 / 3 MI DUE SOUTH NEWPORT BEACH PIER	HAZNET, LUST, CHMIRS
SAFE WAY CLEANERS	CERCLIS, FINDS
AAD VERNON TRUCK SITE	CERCLIS, FINDS
PACIFIC PIONEER PLASTIC CO	CERC-NFRAP
HARSHAW/FILTROL (BANDINI BLVD FACIL)	CERC-NFRAP
ALAMEDA CORRIDOR TRANSP AUTHORITY	RCRA-SQG, FINDS, HAZNET
LANCER SITE	US BROWNFIELDS
ACTA PARCEL MC-614	SLIC
ACTA PARCEL MC-648	SLIC

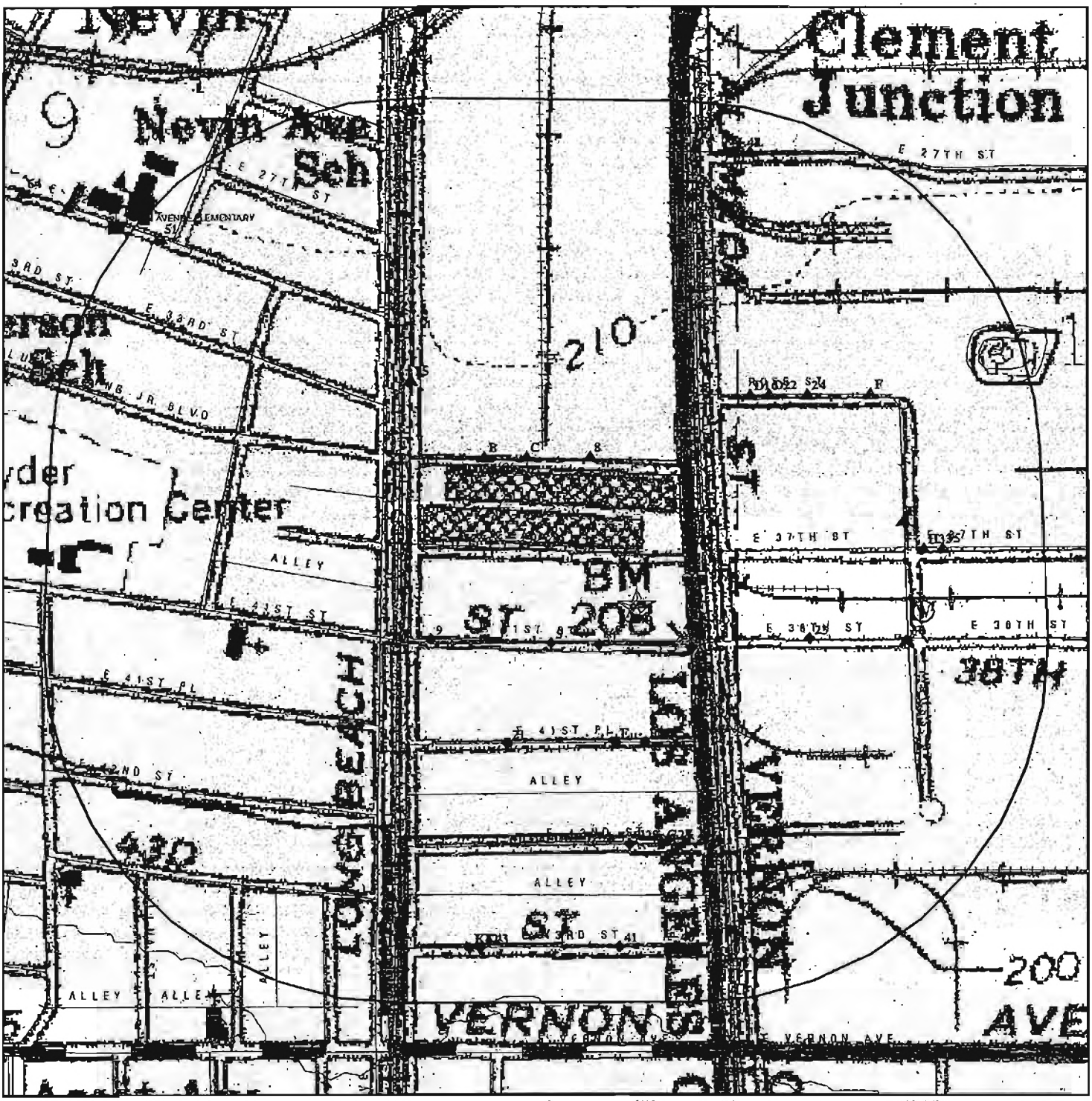
OVERVIEW MAP - 1743456.2s



This report includes Interactive Map Layer display and/or hide map information. The legend includes only those icons for the default map view.

SITE NAME: KEN-1	CLIENT: PSI, Inc.

DETAIL MAP - 1743456.2s



0 1/16 1/8 1/4 Miles

- Target Property
- Sites at elevations higher than or equal to the target property
- Sites at elevations lower than the target property
- Manufactured Gas Plants
- Sensitive Receptors
- National Priority List Sites
- Landfill Sites
- Dept. Defense Sites
- Indian Reservations BIA
- Oil & Gas pipelines
- 100-year flood zone
- 500-year flood zone
- Areas of Concern

This report includes Interactive Map Layers to display and/or hide map information. The legend includes only those icons for the default map view.

SITE NAME: KEN-1	CLIENT: PSI, Inc.

MAP FINDINGS SUMMARY

Database	Target Property	Search Distance (Miles)	< 1/8	1/8 - 1/4	1/4 - 1/2	1/2 - 1	> 1	Total Plotted
FEDERAL RECORDS								
NPL		1.000	0	0	0	0	NR	0
Proposed NPL		1.000	0	0	0	0	NR	0
Delisted NPL		1.000	0	0	0	0	NR	0
NPL RECOVERY		TP	NR	NR	NR	NR	NR	0
CERCLIS		0.500	0	0	1	NR	NR	1
CERC-NFRAP		0.500	0	0	1	NR	NR	1
CORRACTS		1.000	0	0	0	0	NR	0
RCRA TSD		0.500	0	0	0	NR	NR	0
RCRA Lg. Quan. Gen.		0.250	0	1	NR	NR	NR	1
RCRA Sm. Quan. Gen.		0.250	8	6	NR	NR	NR	14
ERNS		TP	NR	NR	NR	NR	NR	0
HMIRS		TP	NR	NR	NR	NR	NR	0
US ENG CONTROLS		0.500	0	0	0	NR	NR	0
US INST CONTROL		0.500	0	0	0	NR	NR	0
DOD		1.000	0	0	0	0	NR	0
FUDS		1.000	0	0	0	0	NR	0
US BROWNFIELDS		0.500	0	0	0	NR	NR	0
CONSENT		1.000	0	0	0	0	NR	0
ROD		1.000	0	0	0	0	NR	0
UMTRA		0.500	0	0	0	NR	NR	0
ODI		0.500	0	0	0	NR	NR	0
TRIS		TP	NR	NR	NR	NR	NR	0
TSCA		TP	NR	NR	NR	NR	NR	0
FTTS		TP	NR	NR	NR	NR	NR	0
SSTS		TP	NR	NR	NR	NR	NR	0
ICIS		TP	NR	NR	NR	NR	NR	0
PADS		TP	NR	NR	NR	NR	NR	0
MLTS		TP	NR	NR	NR	NR	NR	0
MINES		0.250	0	0	NR	NR	NR	0
FINDS		TP	NR	NR	NR	NR	NR	0
RAATS		TP	NR	NR	NR	NR	NR	0
STATE AND LOCAL RECORDS								
CA Bond Exp. Plan		1.000	0	0	0	0	NR	0
SCH		0.250	0	0	NR	NR	NR	0
Toxic Pits		1.000	0	0	0	0	NR	0
State Landfill		0.500	0	1	0	NR	NR	1
CA WDS		TP	NR	NR	NR	NR	NR	0
WMUDS/SWAT		0.500	0	0	1	NR	NR	1
Cortese		0.500	0	1	4	NR	NR	5
SWRCY		0.500	0	0	0	NR	NR	0
LUST		0.500	0	1	3	NR	NR	4
CA FID UST		0.250	6	3	NR	NR	NR	9
SLIC		0.500	0	0	3	NR	NR	3
AOCONCERN		1.000	0	0	0	0	NR	0
UST		0.250	2	1	NR	NR	NR	3
HIST UST		0.250	3	9	NR	NR	NR	12

MAP FINDINGS SUMMARY

Database	Target Property	Search Distance (Miles)	< 1/8	1/8 - 1/4	1/4 - 1/2	1/2 - 1	> 1	Total Plotted
AST		0.250	0	0	NR	NR	NR	0
SWEEPS UST		0.250	10	10	NR	NR	NR	20
CHMIRS		TP	NR	NR	NR	NR	NR	0
Notify 65		1.000	0	0	0	0	NR	0
LA Co. Site Mitigation		TP	NR	NR	NR	NR	NR	0
DEED		0.500	0	0	0	NR	NR	0
VCP		0.500	0	0	0	NR	NR	0
DRYCLEANERS		0.250	1	1	NR	NR	NR	2
WIP		0.250	0	0	NR	NR	NR	0
Los Angeles Co. HMS		TP	NR	NR	NR	NR	NR	0
CDL		TP	NR	NR	NR	NR	NR	0
RESPONSE		1.000	0	0	2	1	NR	3
HAZNET		TP	NR	NR	NR	NR	NR	0
EMI		TP	NR	NR	NR	NR	NR	0
ENVIROSTOR		1.000	0	0	4	20	NR	24
TRIBAL RECORDS								
INDIAN RESERV		1.000	0	0	0	0	NR	0
INDIAN LUST		0.500	0	0	0	NR	NR	0
INDIAN UST		0.250	0	0	NR	NR	NR	0
EDR PROPRIETARY RECORDS								
Manufactured Gas Plants		1.000	0	0	0	0	NR	0
EDR Historical Auto Stations		0.250	0	0	NR	NR	NR	0
EDR Historical Cleaners		0.250	0	1	NR	NR	NR	1

NOTES:

TP = Target Property

NR = Not Requested at this Search Distance

Sites may be listed in more than one database

PHYSICAL SETTING SOURCE MAP - 1743456.2s



- County Boundary
- Major Roads
- Contour Lines
- Earthquake Fault Lines
- Earthquake epicenter, Richter 5 or greater
- Water Wells
- Public Water Supply Wells
- Cluster of Multiple Icons
- Groundwater Flow Direction
- Indeterminate Groundwater Flow at Location
- Groundwater Flow Varies at Location
- Closest Hydrogeological Data
- Oil, gas or related wells

SITE NAME: KEN-1	CLIENT: PSI, Inc.

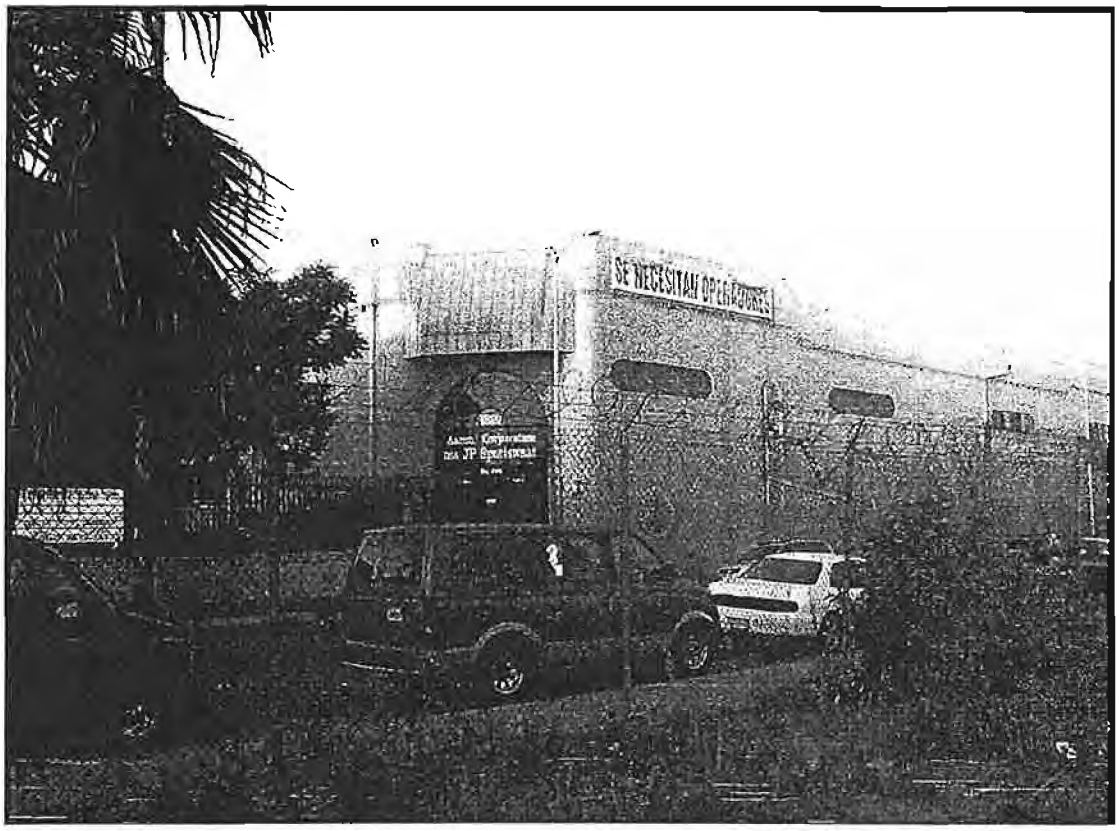
APPENDIX D - RECONNAISSANCE PHOTOGRAPHS



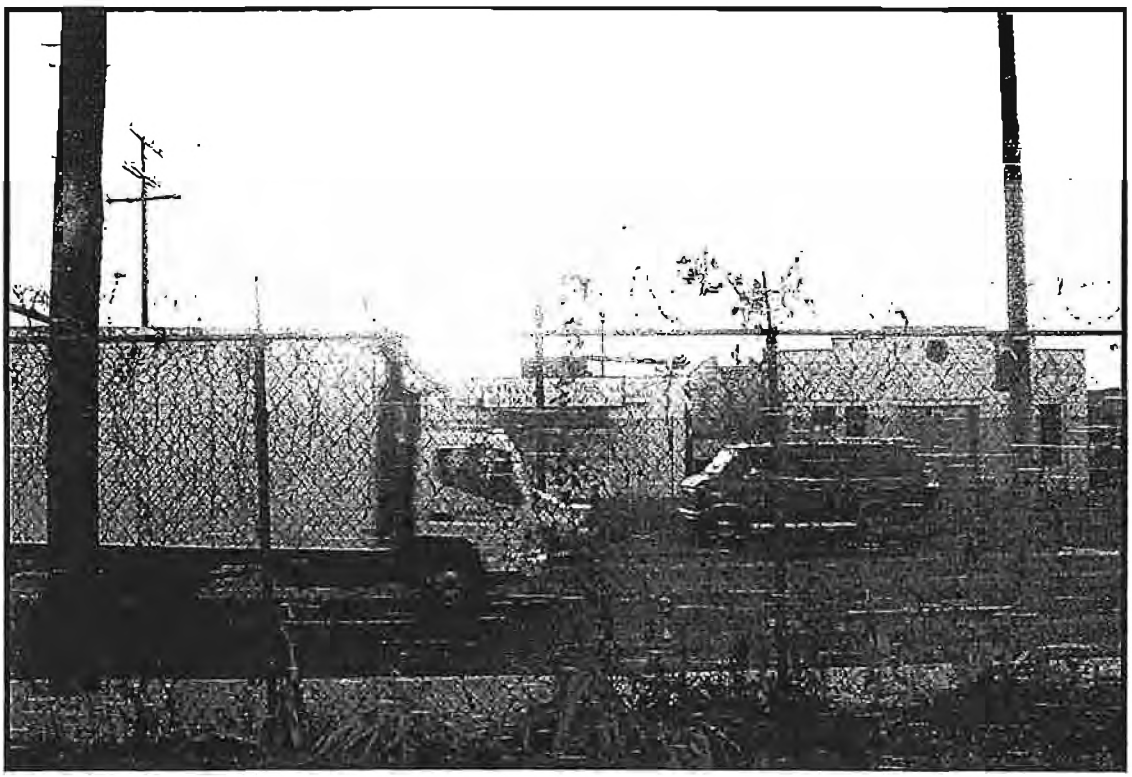
View of the Subject Property Facing South



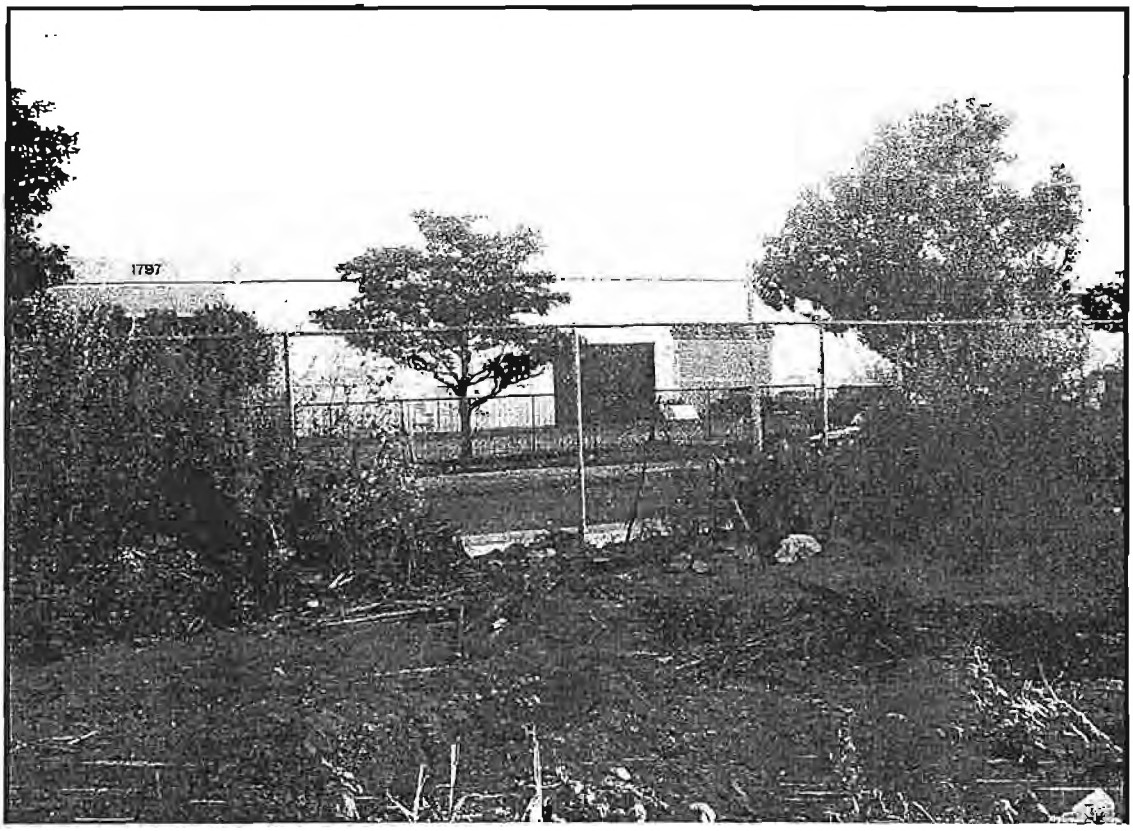
View of the Subject Property Facing East from Long Beach Boulevard



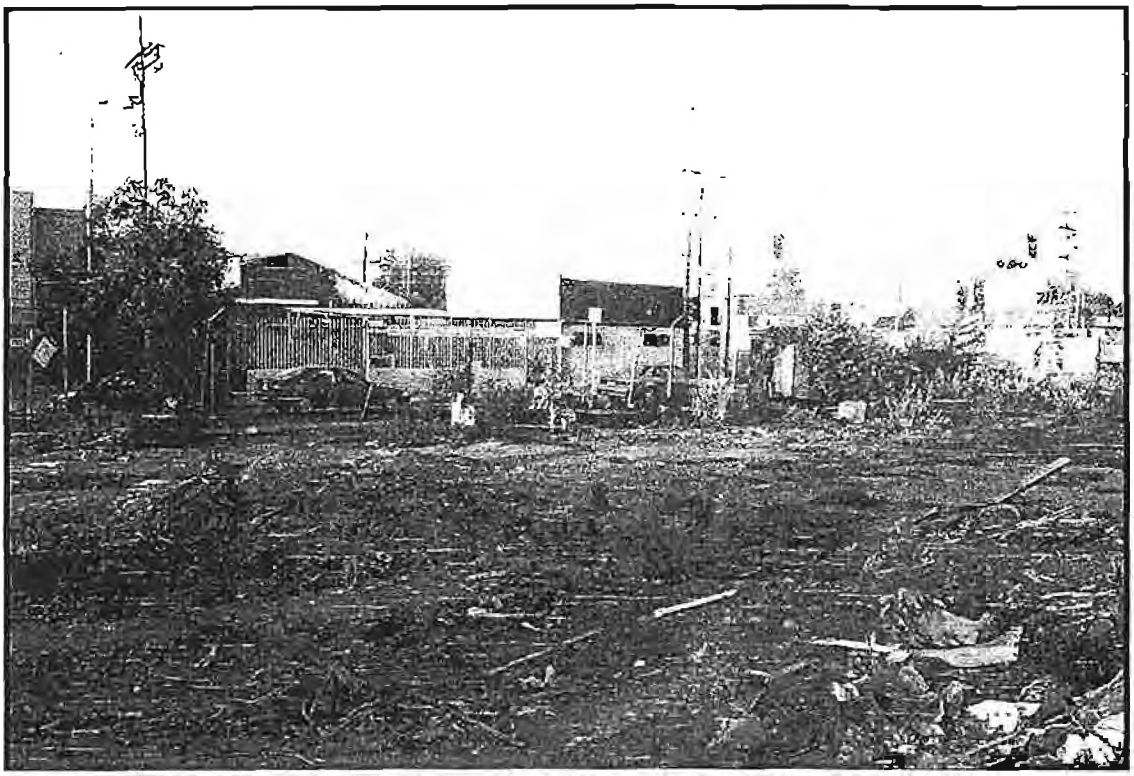
Southern Adjoining Property



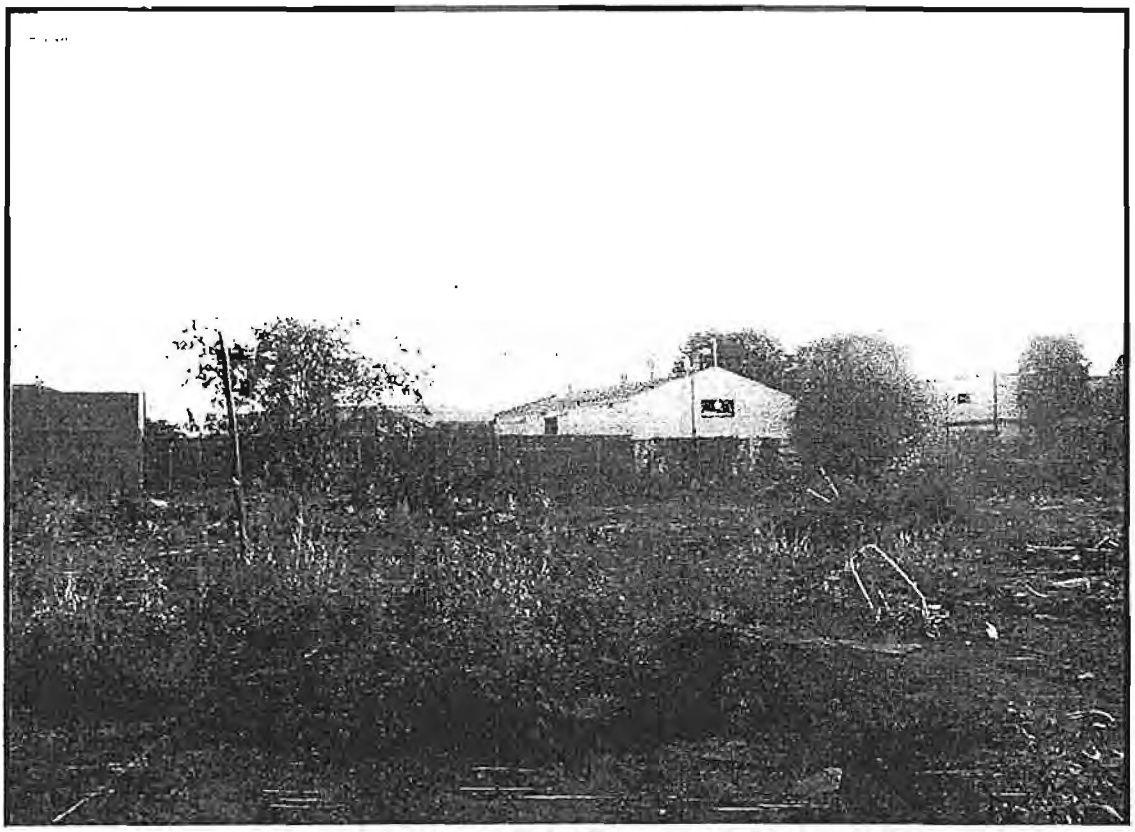
Eastern Adjoining Property



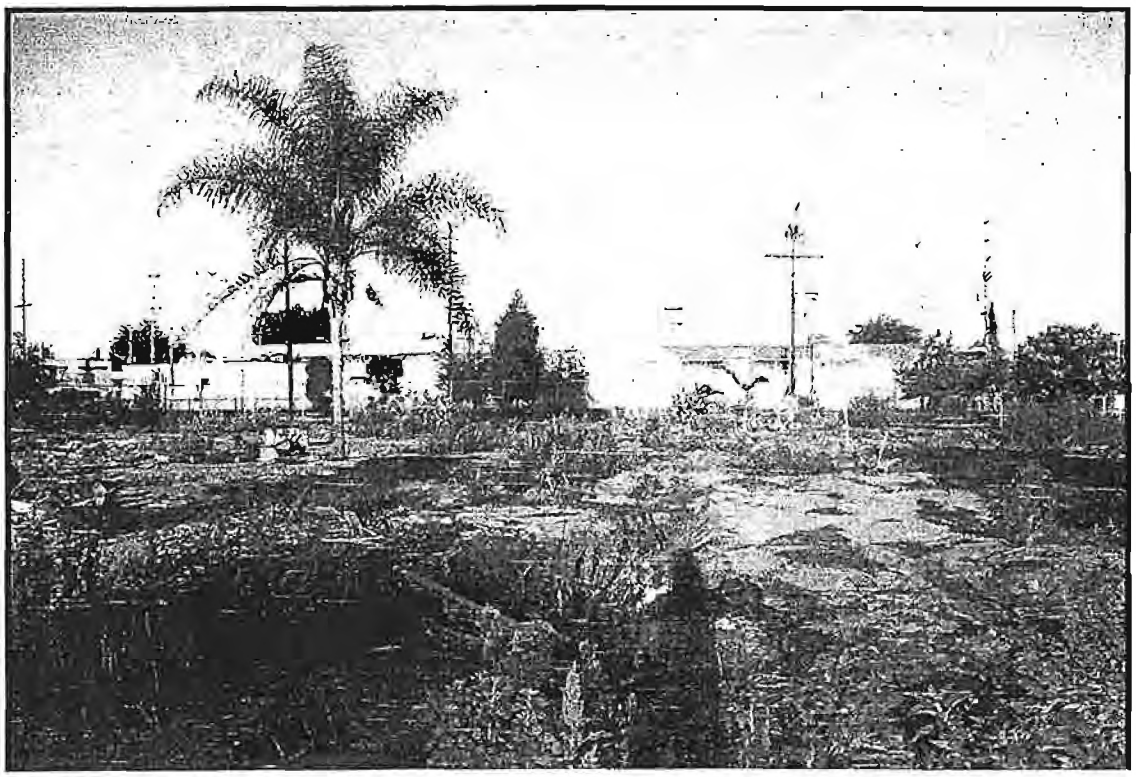
Northern Adjoining Property.



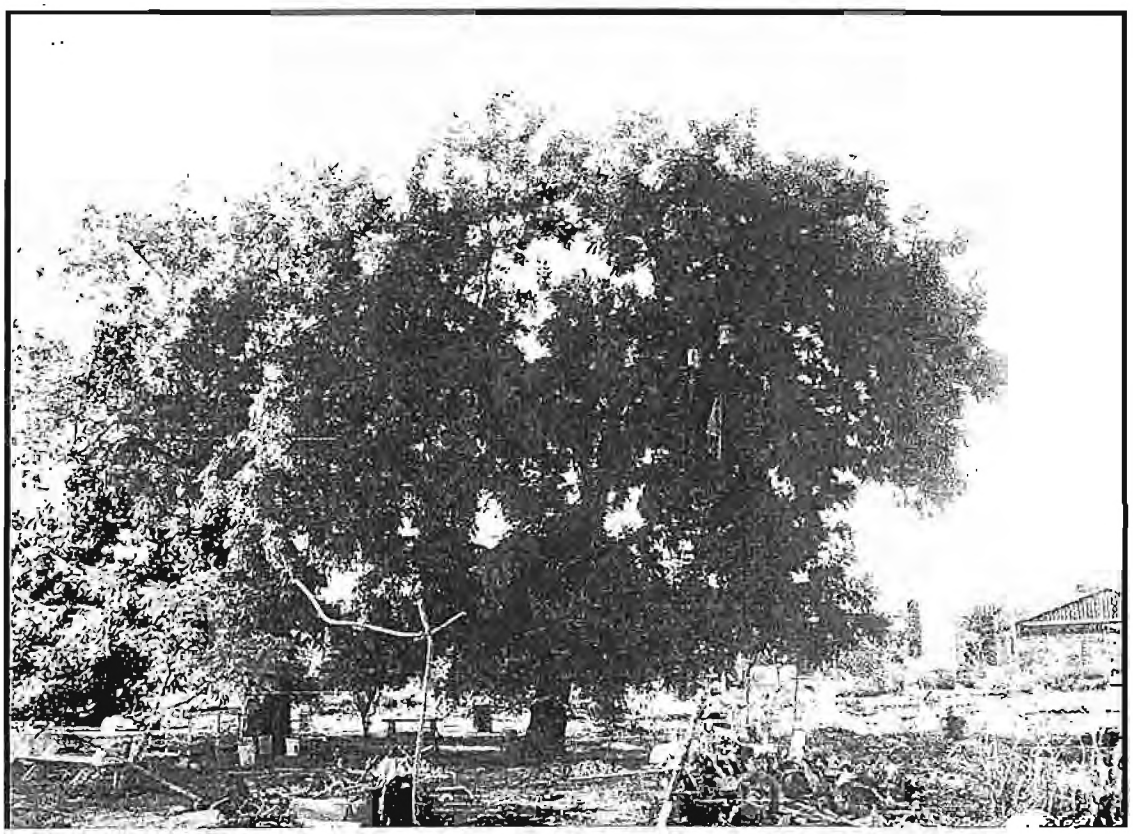
Southern Adjoining Property



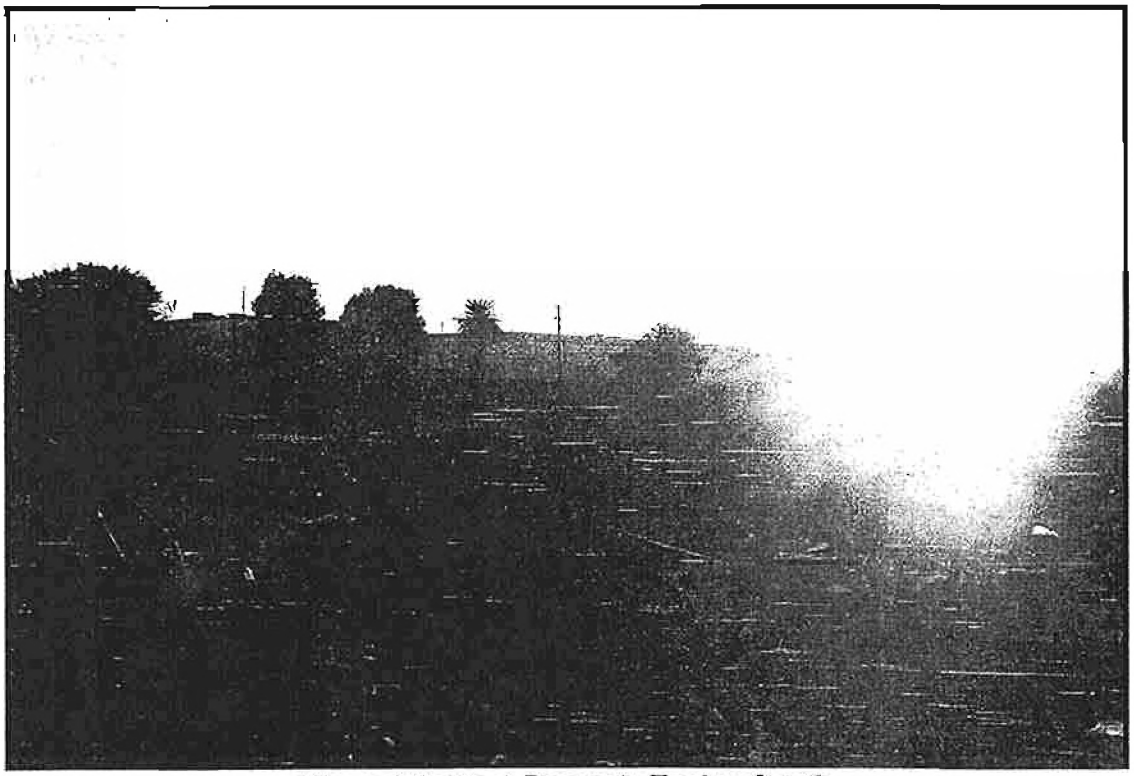
Northern Adjoining Property



Western Adjoining Property



View of Subject Property



View of Subject Property Facing South

APPENDIX E - SOURCE AND INTERVIEW DOCUMENTATION

HARTCROWSER
Earth and Environmental Technologies

Hart Crowser, Inc.
One World Trade Center, Suite 2300
Long Beach, California 90831-2300
FAX (310) 495-6391
(310) 495-6360

FAX Transmittal

DATE: March 27, 1996 RECIPIENTS FAX NO.: (213) 237-0321

SEND TO: **Duane Houston** NO. OF PAGES (including FAX form): 1

COMPANY: **City of Los Angeles Bureau of Fire Prevention, Underground Tanks Unit**

RECIPIENTS DIRECT TELEPHONE NO.: (213) 237-0600

SENDER'S NAME Paul Short JOB NO.: 6769

MESSAGE:

Inspector Houston,

This transmittal is provided to certify that Paul Short is a Registered Geologist in the State of California (RG# 6237, Expires 8/96). Paul Short performed oversight and soil sampling/description for the job described below:

1786 East Martin Luther King Jr. Blvd.
6,000 gallon steel diesel underground storage tank

LAFD Permit No.4572

Tank was removed and soils were sampled on March 7, 1996.

Paul Short

THIS MESSAGE IS INTENDED ONLY FOR THE USE OF THE INDIVIDUAL OR ENTITY TO WHICH IT IS ADDRESSED AND MAY CONTAIN INFORMATION THAT IS CONFIDENTIAL OR OTHERWISE EXEMPT FORM DISCLOSURE TO OTHERS UNDER APPLICABLE LAW. If the reader of this message is not the intended recipient, or the employee or agent responsible for delivering the message to the intended recipient, please recognize that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this communication in error, please notify us immediately by telephone, and return the original message to us at the above address via the United States Postal Service. Thank you.

PLEASE CONTACT (310) 495-6360 IF THERE ARE ANY TRANSMITTAL DIFFICULTIES.

ORDINANCE NO. 169830

An Ordinance transferring the management, supervision, and control of certain real property referred to as the "Lancer site" located at 41st Street and Alameda Street from the Department of Public Works of the City of Los Angeles to the Harbor Department of the City of Los Angeles.

THE PEOPLE OF THE CITY OF LOS ANGELES
DO ORDAIN AS FOLLOWS:

Section 1. Management, supervision and control over that certain real property belonging to the City of Los Angeles and referred to as the "Lancer site" located at 41st Street and Alameda Street is hereby transferred from the Department of Public Works of the City of Los Angeles to the Board of Harbor Commissioners of the City of Los Angeles.

Section 2. Said transfer of jurisdiction is made upon the condition that the value of said real property hereby found to be the sum of Thirteen Million Three Hundred Thousand Dollars ($13,300,000) shall be paid by I.S.D. Inter-Departmental order made payable to the City of Los Angeles.

Section 3. The real property hereby transferred is located in the City of Los Angeles, County of Los Angeles, State of California, and is more particularly described as follows:

Lots 18-62, 81-118, 149-172, East Jefferson Street Tract No. 1.

The total area of the above-described parcels of land is approximately 13.78 acres.

Section 4. The City Clerk shall certify to the passage of this ordinance and cause the same to be published in some daily newspaper printed and published in the City of Los Angeles.

I hereby certify that the foregoing ordinance was introduced at the meeting of the Council of the City of Los Angeles JUN 07 1994 and was passed at its meeting of JUN 14 1994

Approved JUN 20 1994

CITY CLERK
By _____
Deputy

Mayor

APPROVED AS TO FORM
AND LEGALITY

JAMES K. HAHN, City Attorney

By _____
WINSTON F. TYLER, Asst. Assistant

CNS1156699

6/22, 6/23

WFT:aj

File No.: 93-0600-535

CITY OF LOS ANGELES

HARBOR DEPARTMENT

Resolution No. 5378

BUDGET APPROPRIATION

BE IT RESOLVED by the Board of Harbor Commissioners of the City of Los Angeles:

That the transfer of $13.3 million dollars is hereby appropriated from the Unappropriated Fund Balance to Property Acquisition Account, Account 59993, Center 1800, to provide funds for the Lancer Site acquisition.

I HEREBY CERTIFY that the foregoing is a full, true and correct copy of a resolution adopted by the Board of Harbor Commissioners of the City of Los Angeles

on February 9, 1994

Secretary

```
TYPE= LO  ASSR ID NO= 5117 019 902     SBN NO =
                                FILE NO= 50  UPDATE= 01/07/96     DATE= 01/09
ASSR ID NO                VC    REC DT  TRF PRICE # DOC NO  OC1 OC2 DT  INT  DR
5117 019 902 8  CURRENT: 1 860501-50          9 1 9999999  3   7   K 00%-0  Z
                SALE  1: 8 820622-50          1
                SALE  2:
REG  CC   USE
 27 27873 8800
  PARCEL STATUS   TS  TY   SCP  TRA  HOX KEY HOX AMT CLAIM TYPE     REX AMOUN
ACTIVE             3           00007                 INACTIVE
NAME                                                               PCL CRT D
L A CITY                                                             1860501

SPECIAL NAME: NO SPECIAL NAME ON FILE                              PCL DEL D
SITUS ADDRESS                                                        0000000
 1838     E MARTIN LUTHER KING JR BLVD                LOS ANGELES CA
MAIL ADDRESS                                         90011 0000

.. L E G A L   D E S C R I P T I O N ...
EAST JEFFERSON STREET TRACT NO 1 (EX OF                NUMBER OF
STS) LOTS 38,39 ALL OF LOTS 40 THRU 42  N              LEGAL DESCRIPTION LINES

  PF1 = INQ SEL;    6 = NEWS;    9 = ACCUM TXN;    10 = MENU;    11 = EXIT
```

LOS ANGELES CITY FIRE DEPARTMENT
DIVISION- 5 PERMIT - ATMOSPHERIC UNDERGROUND TANK

Div 5-714/715	LAFD FACILITY I.D.	FIRE STATION #	ENFORCEMENT INSPEC
290107-67	NEW	46	Houston

LOCATION INFORMATION

▼ FD USE ONLY ▼

Doing Business As	Date Granted:	PERMIT#
L.A HARBOR DEPT. PORT OF LOS ANGELES. (PAULSHOT)	2-1-96	4572
EPA # CAC001157752	Date Expires: 2-1-97	

Address	Phone #
1786 E. MARTIN LUTHER KING BLVD	(31 495-636

City:	State:	Zip:
LOS ANGELES	CA	

PROPERTY OWNER

Name: LOS ANGELES HARBOR DEPT. PORT OF LOS ANGELES Phone: (310) 732-7678

Address: 425 S. PALOS VERDES ST.

City: SAN PEDRO State: CA Zip: 90733

Print Name:	Signature:

CONTRACTOR INFORMATION

Name: PETRO BUILDERS, INC. Phone: (310) 946-2285

Address: 10600 PAINTER AVE.

City: S. F. SPRINGS State: CA Zip: 90671

CITY BUSINESS #	STATE CONTRACTORS #	WORK COMP
0049127-70	241905	351684

Print Name:	Signature:	Title:
ISELA VAZQUEZ	Isela Vazquez	AGENT

ITEM	QTY	
UGT/S ABANDONMENT BY REMOVAL	1	61000 Fuel Tank,
UGT/S TANK ENTRY/ LINING/ REPAIR		
UGT/S ABANDONMENT IN PLACE		
UGT/S INSTALLATION		
UGT/S ADD TO /ALTER: MONITORING		
UGT/S ADD TO/ ALTER: PIPING /DISPENSER		

TERM-ID: NB10 M A S T E R I N F O R M A T I O N DATE: 02/01/9

BTRC STATUS: NONE

0290107-67
ED P-FILE BEO F-OIL
E

EMPOWERMENT ZONE:

1 TANK REGISTERED & PAID FOR 1996
JRamirez 2/1/96

LN: PORT OF LOS ANGELES
BT:
BA: 1786 E MARTIN LUTHER KING JR BL
LOS ANGELES CA 90058

CITY CLERK, CITY OF LOS ANGELES
BY Jandy R
2-1-96

FD/CC MC SIC START-DT O-B-DT LIAB -DT BCH-DI BCH-NO

State of California—Environmental Protection Agency
Form Approved OMB No. 2050-0039 (Expires 9-30-95)
Please print or type. Form designed for use on elite (12-pitch) typewriter.

See instructions on back on page 6.

Department of Toxic Substa
Sacramento, Califor

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. CAD980813836 Manifest Document No. 00001

2. Page 1 of 1

Information in the shaded a is not required by Federal l

3. Generator's Name and Mailing Address
Port of Los Angeles
425 South Palos Verdes street
San Pedro CA 90733

4. Generator's Phone (310) 732-3683

5. Transporter 1 Company Name
KIETO AND SONS TRUCKING, INC.

6. US EPA ID Number
CAT080016116

7. Transporter 2 Company Name

8. US EPA ID Number

9. Designated Facility Name and Site Address
2000 E. ALAMEDA
COMPTON, CA 90222

10. US EPA ID Number
CAT080013352

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	12. Containers Type	13. Total Quantity	14. Unit Wt/Vol
a. NON RCRA HAZARDOUS WASTE LIQUID	001	TT	XXX75	G
b.				
c.				
d.				

15. Special Handling Instructions and Additional Information
CROSBY & OVERTON
1630 W. 17th STREET - 310-432-5445
LONG BEACH, CA 90813 CAD028409019

alternate disposal sites
• ENVIROPUR WEST CORPORATION
1835 E. 29th STREET 310-595-7431
• SIGNAL HILL, CA 90806 CAT080011859

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are class packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulati

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select th waste management method that is available to me and that I can afford.

Printed/Typed Name	Signature	Month	Day
		12	17

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day
		12	17

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day

19. Discrepancy Indication Space

20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name	Signature	Month	Day

DO NOT WRITE BELOW THIS LINE.

GENERATOR

TRANSPORTER

FACILITY

IN CASE OF EMERGENCY OR SPILL, CALL THE NATIONAL RESPONSE CENTER 1-800-424-8802; WITHIN CALIFORNIA, CALL 1-800-852-7550

GENERATOR RET

TANK CERTIFICATION REPORT

[redacted]

TANK REMOVAL CERTIFICATE #: 04016

Date: 3/7/96

Permit #: LAFD 9572

Site: [illegible]

Address of tank: 1254 E Main [illegible] Ave
[illegible] Angeles CA

Client: [illegible]

[redacted]				
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]

The tank(s) described above has/have been inspected and found to be gas free based on readings obtained with an MSA type 2A Explosivity Meter (LEL of zero percent). A visual inspection has been made of the interior of the tank(s) and no visible contamination has been observed except as noted below.

EXCEPTION: N/

THE AMERICAN BOARD OF INDUSTRIAL HYGIENE
INCORPORATED
CERT. NO.
1973 1433

[redacted]

ABANDONMENT info. sheet

STATUS OF TANKS ON SITE
A. Have all tanks been abandoned on this site? (YES) or NO - How many tanks left? [ ]
B. Are any tanks going to be installed on this site in the future? YES - How many? [ ] or (NO)

ROUTING INSPECTORS - insert ONE copy in each of the following:
1. Div 5 package (original) 2. Inspection blue book 3. Data entry 4. Haz Mat Box F.S. 21 Fac. No. ____

Site address 1786 E M.L. KING Inspection District No. 386 Division 5 permit No. 457
Inspector name HOUSTON Inspector No. 386 Date of abandonment 3-7-
Contractor PETRO BUILD Resp Person JOANNE Phone no.

TANK INFORMATION

Facility/Tank ID no.	Tank size Metal or FRP(circle)	Product	Soils test	No. of samples	Soil color of tank bed, pile, trench, or pit	Tank condition: Holes
1	6K (M) F	DSL	B20, B25, B30	3	NORM	NONE
2	M/F					
3	M/F					
4	M/F					
5	M/F					
6	M/F					
Soils pile				2		Destination of ta
Piping trench				0		ANR
Dispenser pit				0		
Describe excavation: Odor NONE		Liquid in hole NO.		Other		

DOCUMENTS- NECESSARY FOR A COMPLETE PACKAGE

ABANDONMENT METHOD (CHECK)	WASH	HAZARD WASTE	FILL IN PLACE	Documents
Abandonment info sheet	✓			
Time log - Site specific sheet	✓			Due da
Division 5 permit, application, and plot plans	✓			
Cleaning certificates	✓			Collect on-sit
Uniform manifest: rinse liquid or tank	rinse ✓	tank	rinse	Collect on-sit
Uniform manifest - Piping that is not flushed	N/A			Collect on-sit
Certificate of disposal - Tank	✓			
Certificate of disposal - Piping	N/A			
Soil Analysis Report	✓			
Chain of custody	✓			
Plot plan - showing locations of samples	✓			
Division 4 fire permit registration - for tanks discovered on site, that have not been previously paid for.				

SOILS REPORT INFORMATION mg/kg - per million ug/kg - per billion

	Action level	Enter highest reading in mg/kg		Exceeds Action level
TPH	100 PPM (mg/kg)	ND	PPM	YES (NO)
Benzene	1 PPM (mg/kg)	ND	PPM	YES (NO)
Toluene	50 PPM (mg/kg)	ND	PPM	YES (NO)
Xylene	50 PPM (mg/kg)	ND	PPM	YES (NO)
Ethyuene	50 PPM (mg/kg)	ND	PPM	YES (NO)
Total lead	0-200 PPM above bkgrd	5	PPM	YES (NO)
Water samples	anything detected		mg/kg	YES NO

Misc. comments

Package completion & forwarding date: 4-10-96

Check here for comments on back

PETRO BUILDERS, INC.
CONTRACTOR IN FUEL SYSTEMS, FUEL FACILITIES AND ENVIRONMENTAL CONSTRUCTION

PETRO BUILDERS, INC. TEL: (310) 946-2285 • FAX: (310) 946-53

March 25, 1996

CITY OF LOS ANGELES FIRE DEPARTMENT
UNDERGROUND STORAGE TANK DIVISION
200 N. Main St.
Los Angeles Ca 90012

RECEIVED
APR 1 9 1996
UNDERGROUND STORAGE TANK

Attention: Inspector Houston

Reference: City of Los Angeles Port Authority Property - Tank Removal
Permit #4572
1786 E. Martin Luther King Blvd.

Dear Inspector Houston,

Attached please find copies of the following documents for the above referenced project:

Permits	City of Los Angeles Fire Dept., Engineering Dept., and Building and Safety Dept.
Manifest	A copy of the manifest showing the receiving signature at the disposal facility (Demenno-Kerdoon)
Soil Analysis	A copy of the sample analysis results along with a chain of custody and a plot plan showing sample locations.
Tank Certificate	A copy of the tank clean certificate (C.T.L. Environmental)
Tank Destruction	A certificate of destruction from A.M.R.
Reports	A copy of the stamped compaction report

With the attached completed, we ask you to kindly close the referenced file in your system.

If you have any questions regarding the attached information, please do not hesitate to give me a call.

Respectfully submitted
PETRO BUILDERS, INC.

Joanna M. Shultz
R. E. A.



cc: Paul Short / Hart Crowser

Attachments
JMS:imv

LOS ANGELES CITY FIRE DEPARTMENT
DIVISION- 5 PERMIT - ATMOSPHERIC UNDERGROUND TANK

Div 5-714/715	LAFD FACILITY I.D.	FIRE STATION #	ENFORCEMENT BY
290107-67	NBW	46	Houston

LOCATION INFORMATION

▼ FD USE ONLY ▼

Doing Business As	Date Granted:	PERMIT#
L.A. HARBOR DEPT. PORT OF LOS ANGELES (PAULSON)	2-1-96	457
EPA #	**Date Expires:**	
CAC 001157752	2-1-97	

Address	Phone #
1786 E. MARTIN LUTHER KING BLVD	495-62

City:	State:		Zip:
LOS ANGELES	CA	3-8	12:00

PROPERTY OWNER

Name:	Phone:
LOSANGELES HARBOR DEPT. PORT OF LOSANGELES	(310) 732-767

Address: 425 S. PALOS VERDES ST.

City: SAN PEDRO State: CA Zip: 907

Print Name:	Signature:

CONTRACTOR INFORMATION

Name: PETRO Buildings, INC. Phone: (310) 946-228

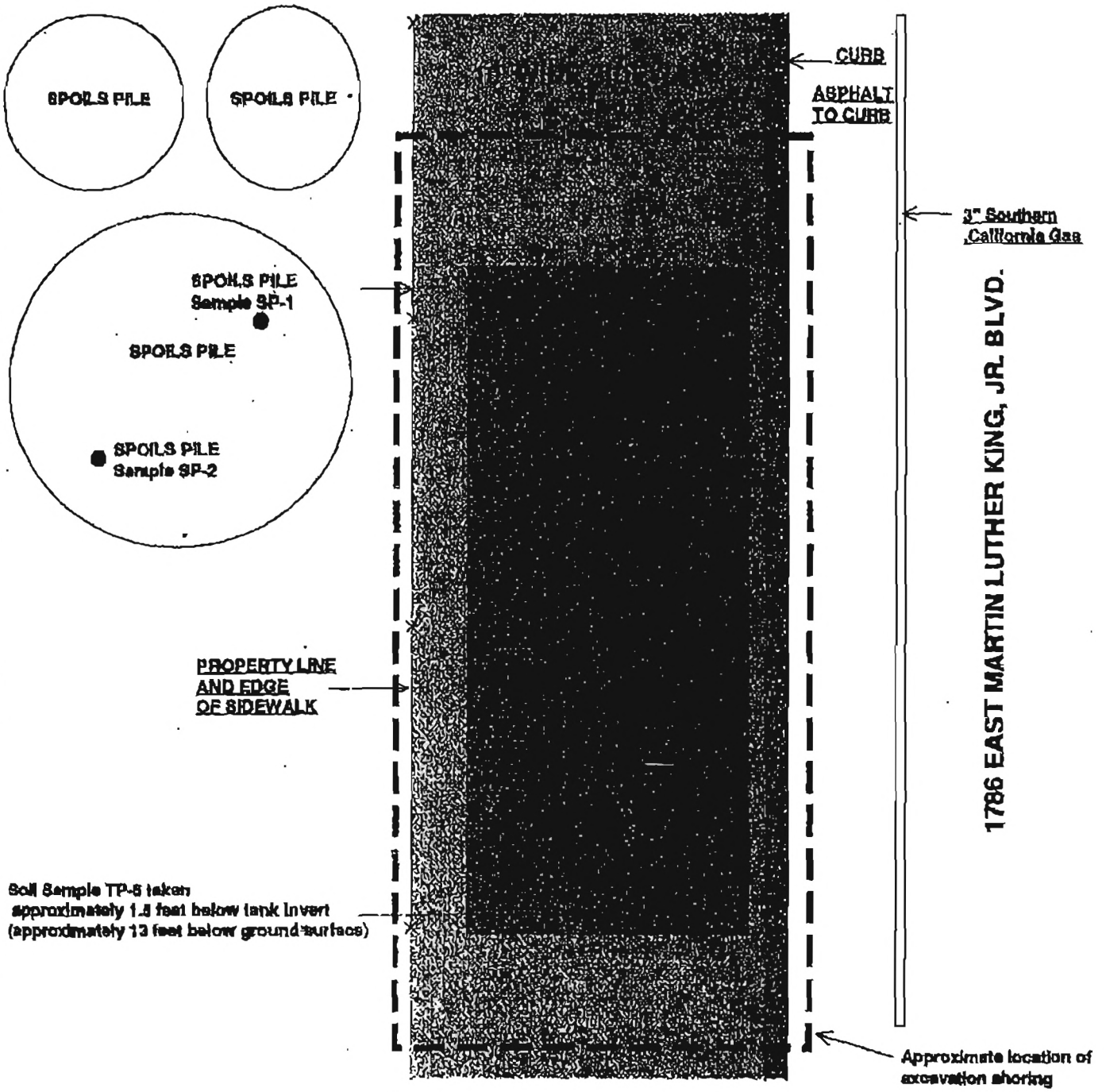
Address: 10607 PAINTER AVE.

City: S. F. SPRINGS State: CA Zip: 906

CITY BUSINESS #	STATE CONTRACTORS #	WORK COM
0049127-76	241905	351682

Print Name:	Signature:	Title:
JOE LA VAZQUEZ		AGENT

ITEM	QTY	
UGT/S ABANDONMENT BY REMOVAL	1	6000 FULL TANK,
UGT/S TANK ENTRY/ LINING/ REPAIR		
UGT/S ABANDONMENT IN PLACE		
UGT/S INSTALLATION		
UGT/S ADD TO /ALTER: MONITORING		
UGT/S ADD TO/ ALTER: PIPING /DISPENSER		



HARTCROWSER

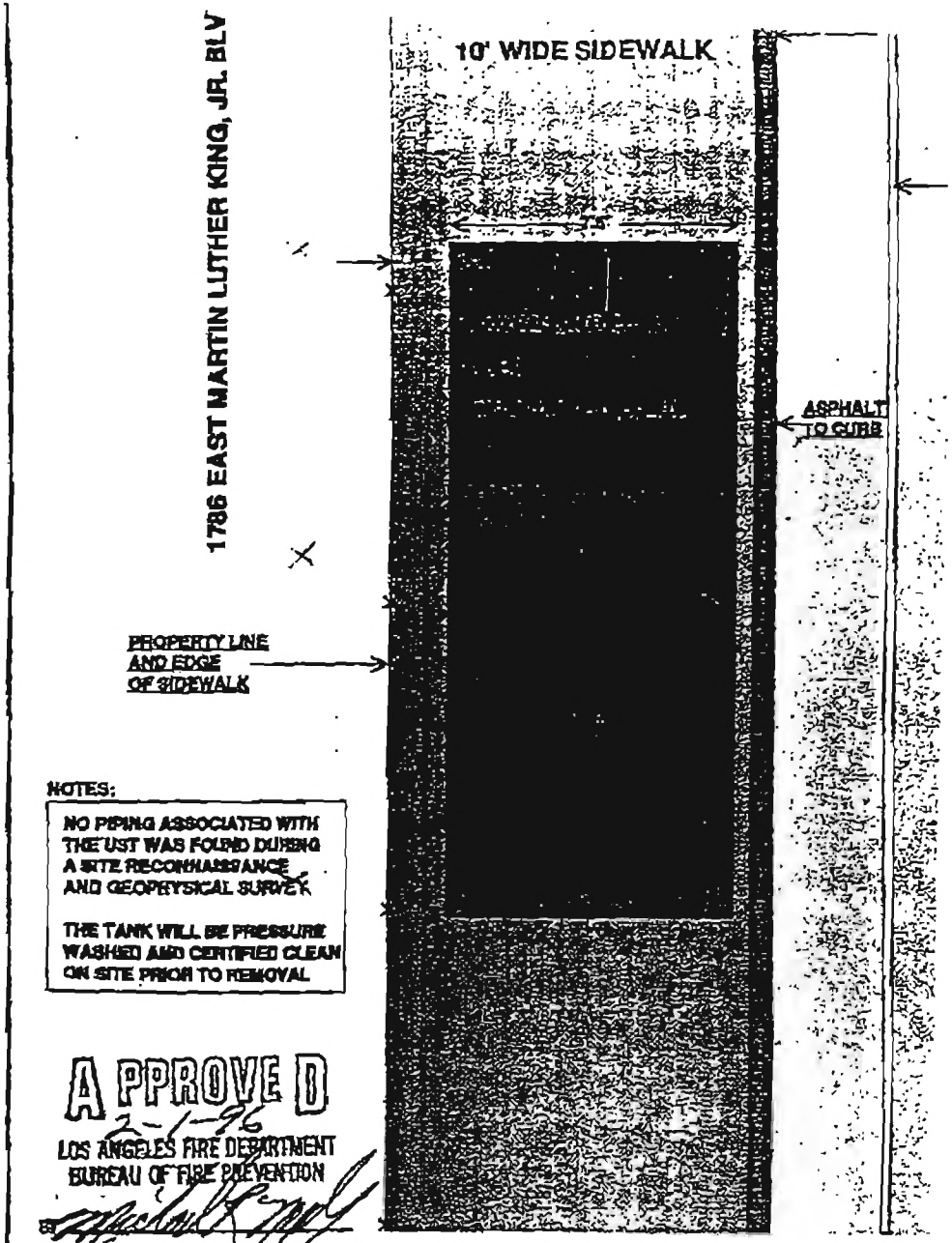
PROJECT NAME: Lancer UST Closure

SAMPLE LOCATION MAP

PROJECT NO.: 8769

DATE: March 1996

FIGURE 1


1786 EAST MARTIN LUTHER KING, JR. BLV
10' WIDE SIDEWALK
75'
ASPHALT TO CURB
PROPERTY LINE AND EDGE OF SIDEWALK
NOTES:
NO PIPING ASSOCIATED WITH THE UST WAS FOUND DURING A SITE RECONNAISSANCE AND GEOPHYSICAL SURVEY
THE TANK WILL BE PRESSURE WASHED AND CERTIFIED CLEAN ON SITE PRIOR TO REMOVAL
APPROVED
2-1-96
LOS ANGELES FIRE DEPARTMENT
BUREAU OF FIRE PREVENTION
BY
#45724
N
0
4
8
Scale in Feet

City of Los Angeles
Dept. of Public Works
Bureau of Engineering
78-3.632 (R3-86)

APPLICATION PERMIT FOR EXCAVATIONS

IN OR ADJACENT TO PUBLIC STREETS
UNDER CHAPTER 6, ARTICLE 2, LOS ANGELES MUNICIPAL CODE

THIS PERMIT NOT VALID UNLESS REGISTER VALIDATED OR RECEIPT SHOWN

JOB ADDRESS
1786 E. MARTIN LUTHER KING JR. BLVD

PROPERTY OWNER/CONTRACTOR/AGENT FOR
FEYKO BUILDERS, INC.

MAIL ADDRESS
10609 PAINTER AVENUE

CITY OR TOWN
SANTA FE SPRINGS

ZIP CODE
CA 90670

TELEPHONE
310 946-2285

PURPOSE OF EXCAVATION
ONE (1) TANK REMOVAL

WORK ORDER NO.	U.I.B. INS. C.A. NO.	INSURANCE EXPIRES
B1002648	C4094153	2-11-96

"A" PERMIT NO.	SURETY BOND C.A. NO.	MISC. RECEIPT NO.
A9650-0147		

ARE STREETS NOW BEING IMPROVED?	WAIVER REQ. NO.	MISC. CASH BOND NO.
☐ YES ☐ NO		

PLAT FILED?	REPORT NO.
☐ YES ☐ NO	

NOTICE TO PERMITTEE

PERMIT MUST BE ON JOB AT ALL TIMES.

THIS PERMIT EXPIRES 6 MONTHS FROM ISSUANCE UNLESS WORK HAS COMMENCED. (LAMC 62.02)

KEEP SIDEWALKS AND GUTTERS CLEAR.

NOTIFY FIRE AND POLICE DEPT. 48 HOURS BEFORE STARTING WORK WHICH BLOCKS ANY STREET.

INSPECTION IS REQUIRED

See Instructions 5 and 6 on back

I hereby agree to observe all requirements of the Municipal Code of the City of Los Angeles, all amendments thereto, and any special requirements made part of this permit.

X

PRINT NAME

JOB ADDRESS

RECEIPT NO.

MUST CALL
FOR INSPECTION
213-580-5080
24 hr. before
Start of work

02/29/96

STATE O.I.S. PERMIT NO.

EXCAVATION SIZE AND TYPE

CONC. CURB	AT $	LIN. FT.	$
CONC. WALK	AT $	LIN. FT.	$
CONC. GUTTER	AT $	LIN. FT.	$
PAVEMENT	AT $	LIN. FT.	$
DIRT	AT $	LIN. FT.	$
ROCK & OIL	AT $	LIN. FT.	$
TOTAL SPECIAL DEPOSIT			$
SPECIAL INSPECTION ____ HOURS ____ DAYS AT ____ PER HOUR DAY			
TESTING RELATIVE COMPACTION	AT	EA.	
STANDARD DENSITY	AT	EA.	
PLAN CHECK 2 HOURS MIN.			
TOTAL SPEC. INSP., etc.			$
TOTAL AMOUNT			$ 30.00

BY
HUEY
BUREAU OF ENGINEERING

2-27-96
DATE

STREETS AFFECTED

CITY OF
LOS ANGELES
PUBLIC WORKS

BUREAU OF ENGINEERING WORK ORDER

Order: E [redacted]

96 | Close Date: | Final Close Date:

LUTHER JR 1786 | Rpt Title:

E N | Major Project:: E P R I V | Program:: 0 4 0 0 | Dist/Div: E6201

Fund: 100 | Reimb. Flag (Y) or N | Elig Pct:

Restrict Flag: Y or (N) [redacted]

D/I Ind: (D) or I

Eng Proj: E P R I V G E N | Other Depts: 7, 6

CF: | Supercedes W.O: | Rev Date:

Comments:) Tank REMOVAL | Plan Check #:

2/13/96

PERMIT #
E1002648
00783251015O
SPECIAL WORK ORDER
$1000.00
CHECK 1000.00

OF ITEMS

IPT: CH1 DATED 2-13-96 $ 1000.00

IPT: CH1 DATED $

007487 110 02/13/96 11:58
THANK YOU

R OF W.O. FEE 00783251015O

PERMIT #
E1002648
00783251015O
SPECIAL WORK O

DILORIZO, INC. (FIELD ACCOUNT) 10

10807 S PAINTER AVENUE
SANTA FE SPRINGS, CA 90670

1 # OF
02/13/96 007487 110

Project Engineer Name: RAMZY SAWAYA Phone: 483-3877

Estimated By: | Submitted By: FRANK V. BONOFF

Reviewed By: | Admin Div: John M. Franco

Approved By: Robert S. Horil

Item		Estimate Cost	Suggested Financing				Dir C
Design							
Construction							
Tot Contr Cost							[redacted]
R/W Estimate							
Pre const	Survey	[redacted]					
	Misc						
Post Award	Svy/Eng						
	Inspect						
Tot Dir Labor							

A950-924

City of Los Angeles
Dept. of Public Works
Bureau of Engineering
78-3.005 (R 4/90)

PRINT OR TYPE

CLASS "A" APPLICATION / PERMIT

For the Construction of Curbs, Driveways, Sidewalks and other Structures in Public Streets

MUST CALL FOR INSPECTION 213-580-5080 24 hr. before start of work

Engineering Permits Hydraulics Central A

APPLICANT/PERMITTEE: PENTRO BUILDERS, INC.

ADDRESS: 10609 PAINTER AVENUE

CITY: SANTA FE SPRINGS | ZIP CODE: CA 90670 | TELEPHONE: 310-946-2285

I hereby agree to observe all requirements of the Municipal Code of the City of Los Angeles, all amendments thereto, and any special requirements made a part of this permit.

X _____ DATE _____

RECEIPT NUMBER: 63511080

CHECK

PAY TO THE ORDER OF BANK OF AMER
DEPOSIT TO CITY TR DEPT #50 AC 14
CHARGE RETURNED ITEMS TO 1092-C

NOTE: Dimensions may be obtained from City Records—Plan No. S610-21

WRITTEN BY: HUEY

VALIDATION TIME: 7-27-96

IF TREE REMOVAL IS NECESSARY, THIS PERMIT IS VOID UNLESS A TREE REMOVAL PERMIT IS ISSUED BY THE BUREAU OF STREET MAINTENANCE.

Curb face to front edge of walk	FT. IN.
Width of sidewalk	FT. IN.
Back edge of walk to property line	FT. IN.
Curb face to property line	FT. IN.
Height of Curb face (Subject to field check)	FT. IN.

FRONTAGE STREET: MARTIN LUTHER KING

INTERSECTING STREET: PERMIT FEE FT. SUBTOTAL FT. SURCHARGE 2% FT. SURCHARGE 7% FT.

STD. PLAN NO.: S610-21

WORK DESCRIPTION OR REMARKS ☐ NEW ☐ REPAIR ☐ RESURFACING X

RESURFACE ONE (1) TANK REMOVAL. BACKFILL CEMENT SLURRY OR 90% COMPACTIO

RESTORE PAVING TO ORIGINAL CONDITIONS. PER E9650-0015. CHARGE TO B10026

RESURFACING: ☐ St. Maint. ☐ Permittee X Sewer Permit No.

IF PARKING METER TO BE REMOVED, CALL D.O.T.

MUST PROVIDE ACCESS FOR PEDESTRIANS & JOIN NEW CONST. TO EXIST. AC PAVEMENT

NOTIFY "B" PERMITS	YES	NO

INSTRUCTIONS AND SPECIFIC REQUIREMENTS FOR PERMITTEES GENERAL

1. A copy of the permit must be on the job at all times.
2. All changes in sketches and permit limits must have prior approval.
3. The numbers to call for inspection are as follows:
   Job location in the San Fernando Valley: (818) 989-8335
   Job location elsewhere: [redacted]
   Must call before noon on workday before inspection required.
4. Notify the inspection and issuing offices immediately if the starting time is changed.
5. Pedestrian and vehicular access must be maintained at all times.
6. All work must comply with the latest edition of the pamphlet, "Work Area Traffic Control."
7. Barricades and lights must be on the job from start of removals to completion of work.
8. If the barricades, protective devices, etc., are not furnished as required the City of Los Angeles may, at its option, provide them. The minimum charge for this service is $50 per day.
9. No backfill is to be placed without prior approval of inspector.
10. No concrete shall be poured without prior approval of the inspector.
11. Driveway apron construction must join existing pavement.

THIS PERMIT EXPIRES IN 180 DAYS

ITEM		QUANTITY	UNIT	RATE	FEE
CONC. CURB			LIN. FT.		$
CONC. GUTTER			SQ. FT.		
CONC. DRIVEWAY			SQ. FT.		
CONC. SIDEWALK			SQ. FT.		
SUBTOTAL					

ITEM	QUANTITY	RATE	D.O.T. PROJECT NO.	TOTAL D.O
Pkg. Mtr. Removal		Ea.		$
Case No.	DRIVEWAYS			
W =				
Y =			BASIC FEE	
X =				
S =			SURCHARGE 2% SC	
T =			7% SC	
SKETCH ATTACHED _____			TOTAL FEE	$

JOB ADDRESS

PERMIT NUMBER

PERMIT NO. A

JOB ADDRESS

Hart Crowser

See instructions on back of page 6.

Department of Toxic Sub
Sacramento, Ca

Environmental Protection Agency
Approved OMB No. 2050-0039 (Expires 9-30-95)
Please print or type. Form designed for use on elite (12-pitch) typewriter.

UNIFORM HAZARDOUS WASTE MANIFEST	1. Generator's US EPA ID No. CAD980813826	Manifest Document No. 90101	2. Page 1 of	Information in the shade is not required by Federa

3. Generator's Name and Mailing Address
County of Los Angeles
12.5 South Paramount Boulevard
San Fernando CA 90733
4. Generator's Phone (310) 732-5683

5. Transporter 1 Company Name: RIETO AND SONS TRUCKING, INC.
6. US EPA ID Number: CAT000611165

7. Transporter 2 Company Name:
8. US EPA ID Number:

9. Designated Facility Name and Site Address
2000 N. ALAMEDA
COMPTON, CA 90222
10. US EPA ID Number: CAT080013352

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	12. Containers Type	13. Total Quantity	14. Unit Wt/Vol
a. NON RCRA HAZARDOUS WASTE LIQUID	001	T	XXX75	G
b.				
c.				
d.				

[redacted]

18. Special Handling Instructions and Additional Information
CHRIS OVERTON
1530 W. 17th STREET - 310-432-5445
LONG BEACH, CA 90813 CAD982409819

alternate : ENVIROPUR WEST CORPORATION
disposal : 1835 E. 29th STREET 310-595-7431
site : SIGNAL HILL, CA 90806 CAT080011059

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classif packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulatic

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined t economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and f threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the waste management method that is available to me and that I can afford.

Printed/Typed Name	Signature	Month	Day
CHRISTOPHER J. RILEY		01	01

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day
RICHARD LUCERO		01	01

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day

19. Discrepancy Indication Space

20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name	Signature	Month	Day
Michael Timms		01	15

DO NOT WRITE BELOW THIS LINE

IN CASE OF EMERGENCY OR SPILL, CALL THE NATIONAL RESPONSE CENTER 1-800-424-8802; WITHIN CALIFORNIA, CALL 1-800-852-7550

95332 US

ROUTING

Sample Custody Record

DATE 3/7/96 PAGE 1 OF 1

HARTCROWSER

Hart Crowser, Inc.
One World Trade Center, Suite 2200
Long Beach, California 90831-2300

JOB NUMBER 6769 LAB NUMBER

PROJECT MANAGER Paul Short

PROJECT NAME Lomita Tank Closure

SAMPLED BY: Paul Short Paul Short

LAB NO.	SAMPLE	TIME	STATION	MATRIX	TESTING: 8015 - Diesel	TESTING: 8020 - BTEX	TESTING: 7420 - T. Lead	NO. OF CONTAINERS	OBSERVATIONS/COMMENTS/ COMPOSITING INSTRUCTIONS
	TP-4	13:45	13'	Soil	X	X	X	1	Standard TAT
	TP-5	13:50	13'	Soil	X	X	X	1	But results
	SP-1	13:55	–	Soil	X	X	X	1	Faxed ASAP
	SP-2	14:00	–	Soil	X	X	X	1	
									Required Detection
									Limits:
									8015 100 ppm or better
									Benzene 1 ppm or better
									T,E,X 50 ppm or better
-all	Paul Short @ 310 495-6360								
if	any questions								

RELINQUISHED BY	DATE	RECEIVED BY	DATE
Paul Short			1/7/96
SIGNATURE		SIGNATURE	
Paul Short	TIME		TIME
PRINTED NAME		PRINTED NAME	2:54
Hart Crowser			
COMPANY		COMPANY	

RELINQUISHED BY	DATE	RECEIVED BY	DATE
SIGNATURE		SIGNATURE	
	TIME		TIME
PRINTED NAME		PRINTED NAME	

TOTAL NUMBER OF CONTAINERS 4

METHOD OF SHIPMENT

SPECIAL SHIPMENT/HANDLING OR STORAGE REQUIREMENTS

DISTRIBUTION:

1. PROVIDE WHITE AND YELLOW COPIES TO LABORATORY
2. RETURN PINK COPY TO PROJECT MANAGER
3. LABORATORY TO FILL IN SAMPLE NUMBERS AND SIGN FOR RECEIPT

+310-495-6351 HARTCROWSER

Applied P & Ch Laboratory
13780 Magnolia Ave. Chino CA 91710
Tel: (909) 590-1828 Fax:-(909) 590-1498

APCL Analytical Report

Submitted to:
Hart Crowser, Inc. (Long Beach)
Attention: Paul Short
One World Trade Center, Ste. 2
Long Beach CA 90831-2300
Tel: (310)495-6360 Fax: (310)495-6361

Service ID #: 801-961785
Collected by: Paul Short
Collected on: 03/07/96

Received: 03/08/96
Extracted: 03/11/96
Tested: 03/08-15/96
Reported: 03/19/96

Sample Description: Soil
Project Description: Lancer Tank Closure/ Job#67

Analysis of Soil Samples

Component Analyzed	Method	Unit	PQL	Analysis Result SP-1 96-01785-1	SP-2 96-01785-2	TP-4 96-01785-3	TP-5 96-01785-4
Lead, Total, by AA	239.1	mg/kg	4	N.D.	5	N.D.	N.D.
Benz. Tolu. Xylen. Ethylbenz. (BTXE)							
Benzene	8020	µg/kg	5	N.D.	N.D.	N.D.	N.D.
Ethylbenzene	8020	µg/kg	5	N.D.	N.D.	N.D.	N.D.
Toluene	8020	µg/kg	5	N.D.	N.D.	N.D.	N.D.
o-Xylene	8020	µg/kg	5	N.D.	N.D.	N.D.	N.D.
m/p-Xylene	8020	µg/kg	5	N.D.	N.D.	N.D.	N.D.
TPH: Diesel	LUFT-B	mg/kg	10	N.D.	N.D.	N.D.	N.D.

PQL: Practical Quantitation Limit. MDL: Method Detection Limit. CRDL: Contract Required Detection Limit
N.D.: Not Detected or less than the practical quantitation limit. "-": Analysis is not required.
J: Reported below PQL.

Respectfully submitted,

Dominic Lau
Laboratory Director
Applied P & Ch Laboratory

CADHS ELAP No.: 1431

Applied P & Ch Laboratory
13780 Magnolia Ave. Chino CA 91710
Tel: (909) 590-1828 Fax: (909) 590-1426

APCL QA/QC Report

Submitted to:
Hart Crowser, Inc. (Long Beach)
Attention: Paul Short
One World Trade Center, Ste. 2
Long Beach, CA 90831-2300
Tel: (310)495-6360 Fax: (310)495-6351

Service ID #: 801-961785
Collected by: Paul Short
Collected on: 03/07/96
Sample description:
Soil
Project: Lancer Tank Closure / Job#6769

Received: 03/08/96
Tested: 03/08-15/96
Reported: 03/20/96

Analysis of Soil Samples

801-961785QC

Component Name	Analysis Batch #	CCV mg/L	CCV %Rec	M-Blank mg/kg	SP Level mg/kg	LCS %Rec	MS %Rec	MSD %Rec	MS/MSD %RPD	Control Limit %Rec	Control Limit %Diff
Metals in Soil by 6010/7000											
Lead, Pb	96M1308	3.5	104	N.D.	150	101	102	104	2	75-125	20

Component Name	Analysis Batch #	CCV mg/L	CCV %Rec	M-Blank mg/kg	SP Level mg/kg	LCS %Rec	MS %Rec	MSD %Rec	MS/MSD %RPD	Control Limit %Rec	Control Limit %Diff
TPH in Soil by GC/FID (M8015)											
Diesel	96G1562	1000	107	N.D.	500	105	102	110	8	65-135	35

Component Name	Analysis Batch #	CCV mg/L	CCV %Rec	M-Blank mg/kg	SP Level mg/kg	LCS %Rec	MS %Rec	MSD %Rec	MS/MSD %RPD	Control Limit %Rec	Control Limit %Diff
BETX in Soil by GC/PID (8020)											
Benzene	96G1545	0.100	104	N.D.	0.50	93	86	98	13	65-135	25
Toluene	96G1545	0.100	108	N.D.	2.00	105	97	110	13	65-135	25
Ethylbenene	96G1545	0.100	107	N.D.	0.475	96	93	106	13	65-135	25
p/m-Xylene	96G1545	0.200	112	N.D.	2.05	106	101	114	12	65-135	25
o-Xylene	96G1545	0.100	107	N.D.	0.675	109	100	114	13	65-135	25

Notation:
ICV – Initial Calibration Verification
CCV – Continuation Calibration Verification
LCS – Lab Control Spike
MS – Matrix Spike
MSD – Matrix Spike Duplicate
ICS – Interference Check Standard
MD – Matrix Duplicate
N.D. – Not detected or less than PQL
CCB – Continuation Calibration Blank
M-blank – Method Blank
SP Level – Spike Level
%Rec – Recovery Percent
%RPD – Relative Percent Differences
%Diff – Control Limit for %RPD
ICP-SD – ICP Serial Dilution
N.A. – Not Applicable

Respectfully submitted,

Kevin Xie
QA/QC Director
Applied P & Ch Laboratory

AMERICAN FUEL TANK METAL RECYCLING, INC.

2202 South Milliken Avenue
Ontario, CA 91761
(714) 988-8000

RECEIVED
MAR 19 1996
DISPOSED

No. 44182

TANK DISPOSAL FOR

Date: 3-7 ,19 96

Job #

P. O. #

CONTRACTOR: Hal Cowser.

ADDRESS:

JOB SITE: Vacant Lot

ADDRESS: 1769 E. Martin Luther King BL. C.A. 90

DESTINATION: A.M.R. 2202 S. Milliken Ave., Ontario, CA 91761

DATE	TIME	PROJECTED TANKS	ORDERED BY:	LIC. NO.

SPECIAL INSTRUCTIONS: c/o Nielsen

TIME IN:

TIME OUT:

✓	Services Rendered	Cost
___	Disposal Fee	200.00
___	Extensive Loading Time	150.00
___	Disposal Fee with Permit	300.00
___	Fiberglass Tank Disposal Fee Per Tank	400.00
___	Fiberglass Tank Delivered	200.00
___	Bobtail Disposal Fee	250.00
___	Cancellation Fee	250.00
	TOTAL CHARGES	$

All fees incurred are per load unless specified. Terms are net 30 days from date of invoice. Contractor's signature represents acceptance of terms for payment, and confirms that tank removal complies with State laws.

CONTRACTOR'S SIGNATURE

TANKS RECEIVED

QTY	GALLONS	TYPE F* S*	NET TONS	TOTAL
	550		.14	
	650		.24	
	1000 - 6 ft.		.51	
	2000		.97	
	3000		1.32	
	5000		2.43	
	7500		3.28	
	9000		3.62	
	12000		4.03	

NO. OF TANKS 1 TOTAL NET TONS

*F — FIBERGLASS *S — STEEL

CERTIFICATE OF TANK DISPOSAL / DESTRUCTION

THIS IS TO CERTIFY THE RECEIPT AND ACCEPTANCE OF THE TANK(S) AS SPECIFIED ABOVE. ALL MATERIALS SPECIF

STRATA-TECH, INC.
GEOTECHNICAL CONSULTANTS
7372 Walnut Avenue, Unit F, Buena Park, California 90620 • 714-521-5611 • 310-427-8099 • FAX 714-521-2552

March 13, 1996

W.O. 88796

RECEIVED
MAR 18 1996

Drew Associates
c/o Petro Builders, Inc.
10609 Painter Avenue
Santa Fe Springs, CA 90670

Subject: Final Compaction Report for Backfill of an Underground Storage Tank Removal Area, L.A. Port Authority Property, Sidewalk Area near 1788 Martin Luther King Blvd., Los Angeles, California

Gentlemen:

In accordance with your request, this geotechnical report has been prepared. The report summarizes our observations and testing during excavation and backfill of a UST removal area at the subject site.

OBSERVATION

Observations of the grading operations were performed on March 8 and 9, 1996.

The bottom of the excavation was observed by the City Grading Inspector. A concrete saddle was abandoned in place, approved by the City Inspector. The bottom of the excavation was approved at a depth of 11 feet by a representative of STRATA-TECH, Inc.

Subsequent backfill soils were placed in six to eight inch lifts and compacted by use of a vibratory plate attachment to a backhoe.

TESTING

Maximum density optimum moisture relationship determinations were performed for each soil type encountered during grading operations. Test results were as follows:

Laboratory Standard: (ASTM:D-1557-91)
4 inch dia. mold; 1/30 cu.ft.vol.;
5 layers-25 blows per layer;
10 lb. hammer dropped 18 inches

Soil Type	Classification	Optimum Moisture Percent	Max. Dry Density Lbs./Cu.Ft.
I (Import)	Tan brown gravelly sand	8.0	132.0

Compaction tests were performed a minimum of every two feet and/or 500 cubic yards of compacted fill soils placed. These tests were performed in accordance with ASTM:D-1556-90 (sand cone) test methods. The test results are summarized in Table I. The approximate test locations are shown on Plate I.

Areas not tested were probed to show adequate compaction.

OPINION

The fill is adequately compacted to support a pavement section. The design of a pavement section is not within the scope of this report.

We appreciate this opportunity to be of service to you.

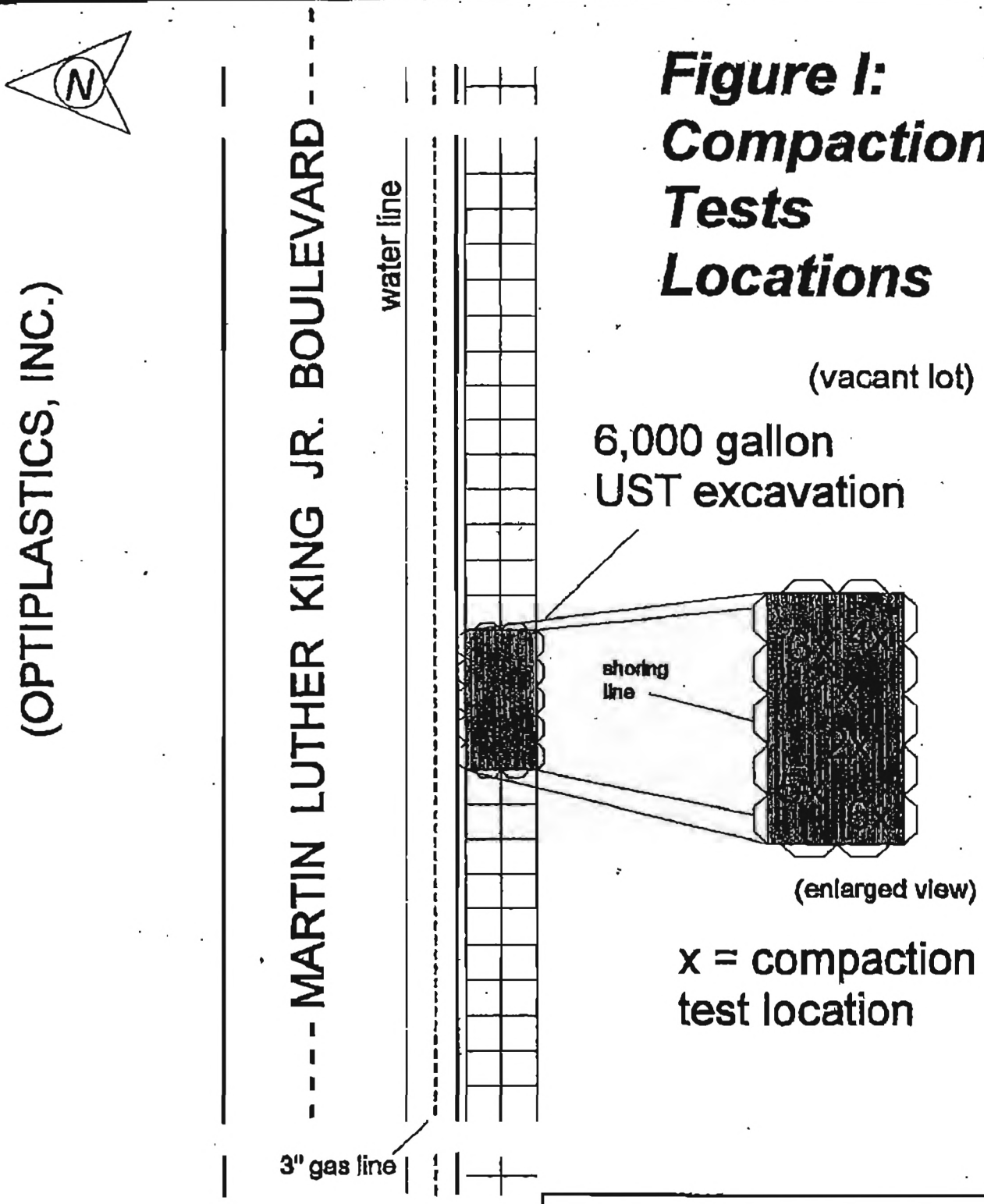
Respectfully Submitted:
STRATA-TECH, INC.

Bruce A. Packard
RGE 66

BAP/ko

REGISTERED PROFESSIONAL ENGINEER
BRUCE A. PACKARD
No. 662
Exp. 3/31/97
GEOTECHNICAL
STATE OF CALIFORNIA

Figure I: Compaction Tests Locations



NOTE: This sketch is not a survey; it is schematic in nature and is intended only for the illustration of data. The indicated scale is approximate and is presented for rough measurement only.

STRATA-TECH, INC.

W.O.	SCALE	DATE
88796	1" = 20'	3/13/96

Test No.	Location	Below Proposed Grade (ft.)	Moisture Percent	Dry Density (Lbs/Cu.Ft.)	Soil Type	Relative Compaction	Date of Test
1	See Figure 1	9.0	8.8	124.6	1	94	3/8/96
2	See Figure 1	7.0	7.6	122.7	1	93	3/9/96
3	See Figure 1	5.0	7.2	124.1	1	94	3/9/96
4	See Figure 1	3.0	6.9	121.7	1	92	3/9/96
5	See Figure 1	2.0	7.4	122.4	1	93	3/9/96
6	See Figure 1	S.G.	6.7	122.6	1	93	3/9/96

TABLE 1

W.O. 88796

CITY OF LOS ANGELES

DEPARTMENT OF BUILDING AND SAFETY

ENGINEER'S CERTIFICATE OF COMPLIANCE FOR COMPACTED EARTH FILLS

LOCATION OF FILL: L.A. Port Authority property: Lancer site, Lots 38-62, 81-130, 149-173, E. Jefferson Street Tract No. 1

JOB ADDRESS: (sidewalk area) 1786 Martin Luther King Jr. Boulevard, Los Angeles, California

SOIL TESTING AGENCY: STRATA-TECH, Inc.

PROPERTY OWNER'S NAME: L.A. Port Authority

OWNER'S ADDRESS:

PER REPORTS ON OUR PROJECT NO: W.O. 88796

DATE WORK COMMENCED ON PROJECT: March 8, 1996

DATE FILL WAS COMPLETED: March 9, 1996

DATE OF THIS CERTIFICATE: March 14, 1996

TO THE SUPERINTENDENT OF BUILDING:

the placing of compacted earth fill on the above describe property, and on the basis of these inspections and tests it is my opinion that the same was placed in conformity with the requirements of the Los Angeles City Building Code.

REGISTERED PROFESSIONAL ENGINEER BRUCE A. PACKARD EXP. 3/31/97 GEOTECHNICAL STATE OF CALIFORNIA

CALIFORNIA CERTIFICATE NO. RGE 662

*For the purpose of this Certificate, to "have personally inspected and tested" shall include inspection and testing performed by any person responsible to the licensed engineer signing this certificate. Where the inspection and testing of all or part of the work above is delegated, fully responsibility shall be assumed by the licensed engineer whose signature is affixed thereon.

F-550—1500 Sets—7-70 (F-79)

Granted 8/28/73

Expires 8/28/74

Fire Department
City of Los Angeles
PERMIT

Reg. No. 1415

Fee Paid $15.00

PERMIT GRANTED

AUG 28 1973

In accordance with terms of the application on file with the Fire Prevention Bureau, permission is granted to:

Name Utility Trailer Sales Co.

Mail to B. R. Higbie
3729 E. Florence Ave.
Bell, Calif. 90201

Permit to: install 2 Atmospheric Tanks shop built as per plans and specifications submitted to the Fire Prevention Bureau.

Location 1801 East 41st Street

BY ORDER OF CHIEF ENGINEER

By [signature] Fire Marshal

4-19-78

Address of Building [redacted]

CITY OF LOS ANGELES

CERTIFICATE OF OCCUPANCY

OL

File

NOTE: Any change of use or occupancy must be approved by the Department of Building and Safety.

This certifies that, so far as ascertained by or made known to the undersigned, the building at the above address complies with the applicable requirements of the Municipal Code, as follows: Ch. 1, as to permitted uses, Ch. 9, Arts. 1, 3, 4, and 5; and with applicable requirements of State Housing Law—for following occupancies:

Issued [redacted] Permit No. and Year [redacted]

[redacted]

Owner [redacted]

Owner's Address [redacted]

By [redacted]

Form B-936—2M Sc1—2-73 (D-10)

Form 526.1 (a) Rev.

APPLICATION FOR FIRE PERMIT

OFFICE OF THE CITY CLERK — LOS ANGELES

NAME OF OWNER(S): UTILITY TRAIL CO. CORP.

DOING BUSINESS AS: UTILITY TRAILER CO.

BUSINESS ADDRESS OR LOCATION DESCRIPTION: 1801 E. 41st. PL.

MAILING ADDRESS: 4073 SO. ALAMEDA ST 90058

TYPE OF BUSINESS: AUTO FUELING STA. 702

DATE STARTED: 11-30-73

TELEPHONE NUMBER: 233-3721

FEES

Permit Fee $ 24.75

Penalty $

Total $ 24.75

NO. OF VEHICLES	CLASSIFICATION CODE	NEW OR TRANSFER	MAXIMUM CAPACITY	MORE THAN 1 CITY HAZARDOUS MATERIAL	OIL WELLS LAFD No.
702					13 1914

NOTICE TO APPLY: You are hereby directed to apply and pay the required fee to the City Clerk for a Fire Permit on or before MARCH 13 1974 or penalty will apply.

Issued by: J. W. NEMECHK (INSPECTOR) Date 2-27-74

APPROVED: James W. Nemechk Date 3/22/74

APPLICATION FOR PERMIT: I hereby declare that I am the owner of the above business or authorized representative of the owner and that I am in charge of the business, operation, occupation or premises described herein. I agree to comply with all Regulations, Laws or Ordinances pertaining to or regulating such business that are now in effect or that may be hereafter adopted.

SIGNATURE OF APPLICANT: [signature]

Title: Owner Date 2/22/74

OFFICE COLLECTION	INSPECTOR REPORT	OFFICE BILLING
Fee $	Fee $	Fee $
Penalty	Penalty	Penalty
Total	Total	Total

PERMIT NUMBER: F 28830-702

TO BILLING UNIT — INITIAL / DATE

DEPUTY CITY CLERK — NO BILLING REQUIRED — INITIAL / DATE

Form 526.2(3)—Rev. 7-70—3M Sets (M-45-46)

APPLICATION FOR FIRE PERMIT

OFFICE OF THE CITY CLERK — LOS ANGELES

FEES

NAME OF OWNER(S) UTILITY TRAILER SALES Co /C	B
DOING BUSINESS AS NONE	Permit Fee $ 24.75
BUSINESS ADDRESS OR LOCATION DESCRIPTION 1801 E 41ST PL L A	Penalty $
MAILING ADDRESS 4073 S ALAMEDA ST ZN 58	Total $ 24.75
TYPE OF BUSINESS AUTO FUELING STATION — DATE STARTED 11-30-73	TELEPHONE NUMBER 233 3264

CLASSIFICATION CODE	NEW OR TRANSFER	MAXIMUM CAPACITY	MAX. QUANTITY—HAZARDOUS MATERIAL	OIL WELL LAT'D No.
F 704				

NOTICE TO APPLY: You are hereby directed to apply and pay the required fee to the City Clerk for a Fire Permit on or before _____ or penalty will apply.

Issued by: _____ Date _____
INSPECTOR

APPROVED: _____ Date _____

APPLICATION FOR PERMIT: I hereby declare that I am the owner of the above business or authorized representative of the owner and that I am in charge of the business, operation, occupation or premises described herein. I agree to comply with all Regulations, Laws or Ordinances pertaining to or regulating such business that are now in effect or that may be hereafter adopted.

SIGNATURE OF APPLICANT _____

Title Vice Pres. Date 1/24/74

OFFICE COLLECTION — Fee $_____ Penalty _____ Total _____

INSPECTOR REPORT — Fee $_____ Penalty _____ Total _____

OFFICE BILLING — Fee $_____ Penalty _____ Total _____

PERMIT NUMBER _____

DEPUTY CITY CLERK J Kalm 1-24-74

TO BILLING UNIT — INITIAL _____ DATE _____

NO BILLING REQUIRED — INITIAL _____ DATE _____

Please bill - Has 7 vehicles at this address

Form 52A.1(a)—Rev. 7-70—SM Sets (51-43-14)

APPLICATION FOR FIRE PERMIT

OFFICE OF THE CITY CLERK—LOS ANGELES

FEES

NAME OF OWNER(S) UTILITY TRAILER SALES CO /C	
DOING BUSINESS AS NONE	Permit Fee $ 24.75
BUSINESS ADDRESS OR LOCATION DESCRIPTION 1801 E 41ST PL L A	Penalty $
MAILING ADDRESS 4073 S ALAMEDA ST 2N 5F	Total $ 24.75
TYPE OF BUSINESS AUTO FUELING STATION DATE STARTED 11-30-73	TELEPHONE NUMBER 233 3221

B

CLASSIFICATION CODE	NEW OR TRANSFER	MAXIMUM CAPACITY	MAX. QUANTITY—HAZARDOUS MATERIAL	OIL WELL, LAFD No.
F 702				

NOTICE TO APPLY: You are hereby directed to apply and pay the required fee to the City Clerk for a Fire Permit on or before _____ or penalty will apply.

Issued by: _____ Date _____
INSPECTOR

APPROVED: _____ Date _____

APPLICATION FOR PERMIT: I hereby declare that I am the owner of the above business or authorized representative of the owner and that I am in charge of the business, operation, occupation or premises described herein, I agree to comply with all Regulations, Laws or Ordinances pertaining to or regulating such business that are now in effect or that may be hereafter adopted.

SIGNATURE OF APPLICANT _____

Title Vice Pres. Date 1-24-74

OFFICE COLLECTION

Fee $ _____
Penalty _____
Total _____

INSPECTOR REPORT

Fee $ _____
Penalty _____
Total _____

OFFICE BILLING

Fee $ _____
Penalty _____
Total _____

F
PERMIT NUMBER

J. Kahn 1-24-74
DEPUTY CITY CLERK

TO BILLING UNIT

INITIAL	DATE

NO BILLING REQUIRED

INITIAL	DATE

Please bill - mail 1/30/74 AT MR

DEPARTMENT OF BUILDING AND SAFETY: Date: 5-1-74

The following applicant has applied for a Fire Permit to conduct a(n)
AUTO FUELING STATION
at the location shown below:

UTILITY TRAILER CO CORP

DA 1801 E 41ST PL L A

DA 4872 S ALAMEDA ST XR SB

F20[illegible]-70R

Unless notified to the contrary within ten (10) calendar days, the Fire Department will assume that this applicant has met all zoning and other Department of Building and Safety regulations and requirements pertinent to the issuance of a FIRE PERMIT and will accordingly take action on said application.

RAYMOND M. HILL
Chief Engineer
Fire Department

CITY OF LOS ANGELES
CALIFORNIA

BOARD OF
FIRE COMMISSIONERS

JAY H. GRODIN
PRESIDENT
CORINA ALARCON
VICE-PRESIDENT
ROLAND L. COLEMAN
LOUISE L. FRANKEL
TYRONE FREEMAN

PATRICIA A. ESCARSEGA
EXECUTIVE ASSISTANT II

JAMES K. HAHN
MAYOR

DEPARTMENT OF FIRE

200 NORTH MAIN STREET
LOS ANGELES, CA 90012

WILLIAM R. BAMATTRE
FIRE CHIEF

(213) 485-6001
FAX (213) 485-6247

http://www.lafd.org

SCANNED
SEP 0 9 2003

June 2, 2003

Mr. Morris Malekan
Ortek, General Partnership
1801 East 41st Place
Los Angeles, CA 90058

RE: [redacted] Los Angeles, California
[redacted] Los Angeles, California

Dear Mr. Malekan:

Per your request, the Fire Department has reviewed the information on the underground storage tanks that were removed from 4101 South Alameda Street. A "no further action" letter was drafted and issued for those tanks. Upon further review, the Fire Department has determined that the serial numbers of the (2) 10,000 gallon UST's that were installed at 1801 East 41st Place were identical to the UST's referenced at the 4101 South Alameda Street abandonment.

The "no further action" letter for 4101 South Alameda Street was drafted in error. A new letter has been drafted and is enclosed for your records. The Fire Department will include this letter in both files for future reference.

Thank you for bringing this situation to our attention. Please contact Captain Frank Comfort of the Environmental Unit, at (213) 485-7543 if you have any further questions or concern.

Very truly yours,

Frank K. Comfort

Frank Comfort, Captain I
Commander, Environmental Unit

FC:FC:amo:env\4779

F-280

FIRE DEPARTMENT — CITY OF LOS ANGELES

APPLICATION FOR PERMIT

Reg. No. 23415

Date AUG 28 19[illegible]

Name of Owner	Doing Business As
UTILITY TRAILER SALES CO	TRAILER MFG.

Address of Owner	Owner's Phone
4073 So. ALAMEDA, LOS ANGELES, CA	233-3221

Address of Installation	Phone at Installation
1801 EAST 41ST PLACE	SAME

Mail Permit to

B. R. WHARIE - SMITH 3729 EAST FLORENCE, BELL CA 90201

Signature of Applicant	Title	Contractor's Phone
Raymond Wharie	CONTRACTOR	582-6267

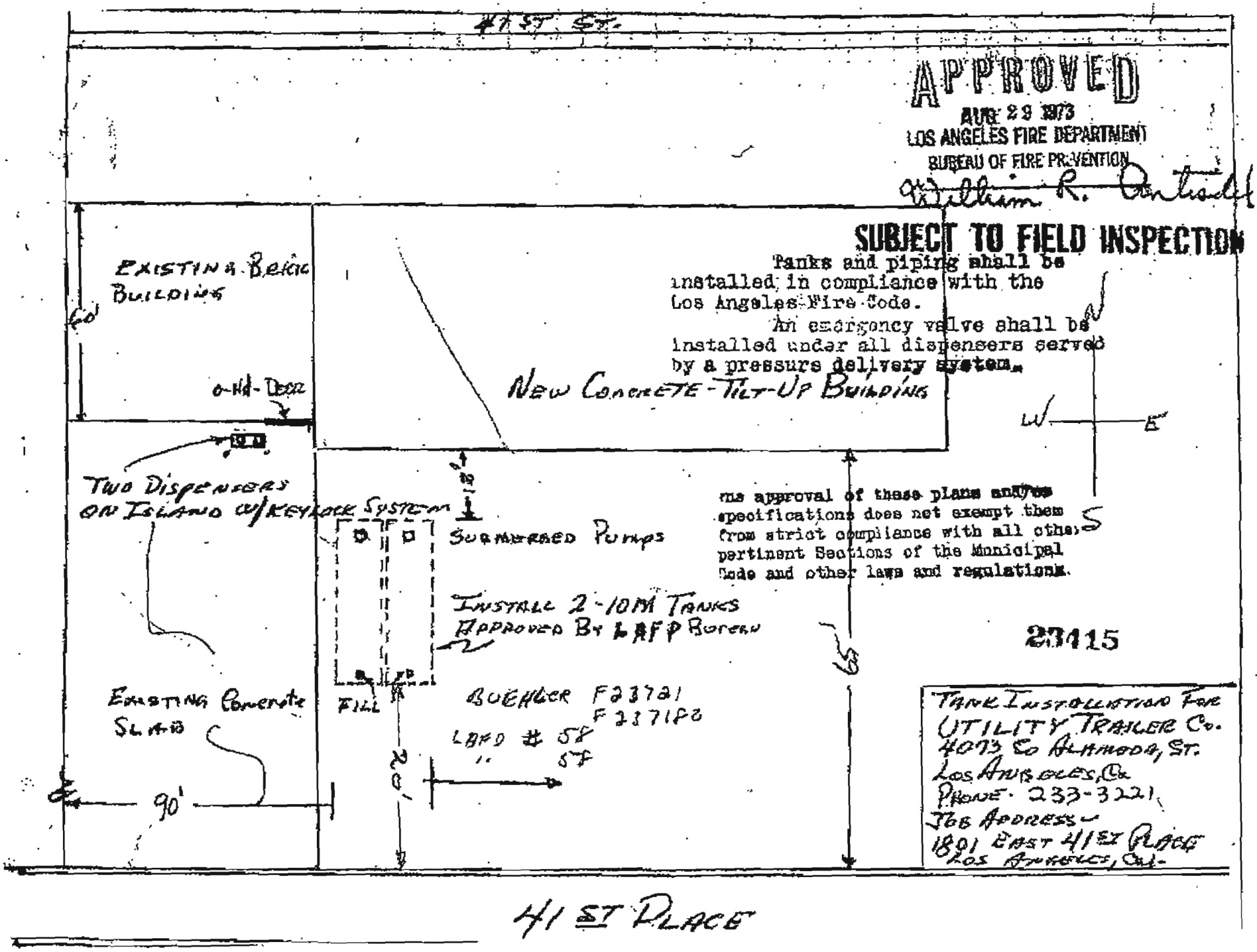
Do Not Write Below This Line

NO.	ITEM	FEE
2	Install Atmospheric Tanks	15 00

PERMIT GRANTED

AUG 28 1973

Total Fee	Approved	Disapproved	Date	Inspector
15 00	☑	☐	8-29-73	J. M. Norman


41 ST ST.
APPROVED
AUG 29 1973
LOS ANGELES FIRE DEPARTMENT
BUREAU OF FIRE PREVENTION
William R. Ontiveros
SUBJECT TO FIELD INSPECTION
Tanks and piping shall be installed in compliance with the Los Angeles Fire Code.
An emergency valve shall be installed under all dispensers served by a pressure delivery system.
EXISTING BRICK BUILDINGS
60'
O-Ht-Door
NEW CONCRETE-TILT-UP BUILDING
W
E
S
TWO DISPENSORS ON ISLAND W/KEYLOCK SYSTEM
SUBMERSED PUMPS
INSTALL 2-10M TANKS APPROVED BY LAFD BUREAU
FILL
BUEHLER F23721
F23171P2
LAFD # 58
57
20'
EXISTING CONCRETE SLAB
90'
ms approval of these plans and/or specifications does not exempt them from strict compliance with all other pertinent Sections of the Municipal Code and other laws and regulations.
23115
TANK INSTALLATION FOR
UTILITY TRAILER Co.
4077 So ALAMEDA, ST.
LOS ANGELES, Ca
PHONE 233-3221
JOB ADDRESS
1891 EAST 41ST PLACE
LOS ANGELES, Cal.
41 ST PLACE

PRIVILEGED AND CONFIDENTIAL
ATTORNEY-CLIENT PRIVILEGE AND
ATTORNEY WORK PRODUCT DOCTRINE

SITE INVESTIGATION REPORT

October 29, 2003

Performed at:

LANCER SITE

**BETWEEN SOUTH ALAMEDA STREET AND EAST LONG BEACH AVENUE
EAST 41st STREET AND EAST MARTIN LUTHER KING JR. BOULEVARD,
LOS ANGELES, CALIFORNIA 90731**

DRAFT

Prepared for:

**PORT OF LOS ANGELES
425 S. PALOS VERDES STREET
SAN PEDRO, CA 90731**

**ADP Number 930319-559
Agreement Number 2255
Project Directive 7**

Performed by:

Pacific Edge Engineering, Inc.

22772 Centre Drive, Suite 230
Lake Forest, CA 92630

In Association with:

Jenkins Environmental Associates

JEA

11749 Capri Drive
Whittier, CA 90601

TABLE OF CONTENTS

Section		Page
1.0	**EXECUTIVE SUMMARY**	**1**
1.1	Investigation Rationale and Overview	1
1.2	Analytical Results Summary and Conclusions	2
2.0	**INTRODUCTION**	**5**
2.1	Site Location	5
2.2	Site Description	5
2.3	Background	6
3.0	**SITE INVESTIGATION**	**8**
3.1	Investigation Areas	8
3.2	Soil Sampling	9
3.3	Soil Analytical	10
4.0	**ANALYTICAL RESULTS**	**11**
4.1	TPH Full Carbon Chain (EPA Method 8015M)	11
4.2	SVOCs (EPA Method 8270C)	11
4.3	VOCs (EPA Methods 5035/8260B)	11
4.4	Total Metals (CCR Title 22 Metals)	12
4.5	Hexavalent Chromium (EPA Method 7199 with alkaline digestion)	13
4.6	Organochlorine Pesticides (EPA Method 8081A)	13
4.7	PCBs (EPA Method 8082)	13
4.8	Herbicides (EPA Method 8151)	14
5.0	**DISCUSSION OF RESULTS AND CONCLUSIONS**	**15**
5.1	TPH Full Carbon Chain (EPA Method 8015M)	15
5.2	SVOCs (EPA Method 8270C)	15
5.3	VOCs (EPA Methods 5035/8260B)	15
5.4	Total Metals (CCR Title 22 Metals)	15
5.4.1	*Lead*	*15*
5.4.2	*Arsenic*	*16*
5.4.3	*Barium, Copper, and Zinc*	*17*
5.5	Hexavalent Chromium (EPA Method 7199 with alkaline digestion)	17
5.6	Organochlorine Pesticides (EPA Method 8081A)	17
5.7	PCBs (EPA Method 8082)	17
5.8	Herbicides (EPA Method 8151)	18
5.9	Investigation Status at Potential Areas of Concern	18
5.10	General Soil lithology	18
6.0	**LIMITATIONS**	**20**
7.0	**REFERENCES**	**21**

DRAFT

TABLES

Table 1	Potential Areas of Chemical Concern
Table 2	Summary of Soil Sampling and Analyses
Table 3	8015M TPH Full Carbon Chain Soil Quality Summary
Table 4a	8270C (Detected Analytes Only) Soil Quality Summary
Table 4b	8270C Soil Quality Summary
Table 5a	8260B (Detected Analytes Only) Soil Quality Summary
Table 5b	8260B Soil Quality Summary
Table 6	6010B Soil Quality Summary
Table 7	8081A Soil Quality Summary
Table 8	8151A Soil Quality Summary

FIGURES

Figure 1	Site Location Map
Figure 2	Site Map
Figure 3	Boring Locations
Figure 4	Lead and Arsenic Analytical Results

DRAFT

APPENDICES

Appendix A	Assessor Parcel Maps
Appendix B	Sanborn Maps
Appendix C	Laboratory Analytical Reports and Chain-of-Custody Forms
Appendix D	Excerpts from HartCrowser's January 1995 Report
Appendix E	Soil Boring Logs

1.0 EXECUTIVE SUMMARY

This report presents the results of a surface and subsurface soil investigation performed by Pacific Edge Engineering, Inc. (Pacific Edge) on the LANCER site (Site) located in Los Angeles, California. The Site consists of approximately 13 acres and is bounded by East 41st Street on the south, East Martin Luther King Jr. Boulevard on the north, South Alameda Street on the east and East Long Beach Avenue on the west in the City of Los Angeles. The Site is bisected by East 40th Place. The area north of East 40th Place is referred to as the North Parcel with the area south of East 40th Place being the South Parcel. A site location map is presented as Figure 1. A detailed Site Map is presented as Figure 2.

The purpose of the investigation was to evaluate surface and subsurface soil for the presence of hazardous waste. A description of the investigation, analytical results, and conclusions is presented below.

1.1 INVESTIGATION RATIONALE AND OVERVIEW

Pacific Edge's approach for this soil investigation of the Site included the following key considerations:

- Previous assessments and investigations of the Site were performed by Montgomery Watson (Montgomery) in 1993 and HartCrowser, Inc. (HartCrowser) in 1994 and 1995. The findings of these previous reports are further discussed in Section 2.3. HartCrowser's investigation utilized a random grid sampling approach, which indicated elevated concentrations of total lead and arsenic in surface soil. Pacific Edge's investigation included additional sampling of surface and subsurface soil to 1) confirm elevated lead and arsenic concentrations in the surface soil, and 2) assess the areas of potential concern identified in previous evaluations. Copies of Sanborn Maps (also known as Fire Insurance Maps) for the Site were used to locate the areas of potential concern identified in previous evaluations. Upon review of the 1920, 1949, 1953, 1954, 1958, 1960, 1963, and 1968 Sanborn Maps, additional areas of potential concern were identified.

- The suite of analytical tests performed was expanded (when compared to previous evaluations) and included the following chemicals based upon historical Site activities.

  - Total Petroleum Hydrocarbons (TPH) Full Carbon Chain
  - Semivolatile Organic Compounds (SVOCs)
  - Volatile Organic Compounds (VOCs)
  - CCR Title 22 Metals
  - Hexavalent Chromium
  - Organochlorine Pesticides and Polychloinated Biphenyls (PCBs)
  - Herbicides

- Analysis of the 0.5-foot (ft) depth soil sample for TPH, SVOCs, metals, hexavalent chromium, organochlorine pesticides and PCBs, and herbicides was considered to be representative of the surface soil. Deeper samples were only analyzed if the sample from a shallower depth showed an abnormally high chemical concentration, or if the feature being assessed was expected to impact at greater depths. Due to the typical disturbance of surface soil, and the associated volatilization of VOCs in disturbed soil, the 0.5-ft sample was not analyzed for VOCs.

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1.2 ANALYTICAL RESULTS SUMMARY AND CONCLUSIONS

TPH compounds were detected at very low levels in a majority of samples. The highest TPH concentration for the sum of hydrocarbon compounds with carbon chain lengths of 7 to 44 (C7-C44) was 550 milligrams per kilograms (mg/kg) in a 0.5-ft soil sample. Most TPH compounds were detected in the C30+ range with minimal detections of TPH compounds below the 0.5-ft depth. None of the analytical results for shallow soil samples was high enough to justify the testing of deeper soil samples.

None of the analytical results for TPH indicate 1) any significant release of hydrocarbon based materials, or 2) levels which would cause the impacted soil to require removal from the Site based upon applicable rules and regulations.

SVOCs were not detected above laboratory reporting limits in a majority of soil samples, except that a few samples contained low levels of polynuclear aromatic hydrocarbons (PAHs) and phthalates (di-n-butylphthalate and bis(2-ethylyhexyl)phthalate).

None of these samples contained measurable concentrations of SVOCs (PAHs or phthalates) that 1) were above their respective USEPA Region 9 Preliminary Remedial Goals (PRGs) for industrial soil, or 2) would cause the soil to be classified as a hazardous waste based upon applicable rules and regulations.

VOCs (acetone, benzene, and toluene) at concentrations below or near the analytical reporting limits were detected in most 5-ft and 10-ft depth soil samples. Analytical method blanks did not detect these VOCs. None of the 15-ft samples contained VOCs above laboratory reporting limits. Tetrachloroethene was detected above laboratory reporting limits at concentrations of 1.2 to 5.4 microgram per kilogram (ug/kg) in a few soil samples.

All VOC concentrations were well below the respective PRG for industrial soil and would not be classified as a hazardous waste based upon applicable rules and regulations.

Metals at various concentrations were detected in all soil samples. Elevated levels of total lead and arsenic were reported in a number of samples from the site. A few samples contained elevated levels of barium, copper, and/or zinc. Results and conclusions associated with lead, arsenic, barium, copper, and zinc are presented below.

- **Lead** - One soil sample from the North Parcel had a concentration of total lead (4,700 mg/kg) above the Total Threshold Limiting Concentration (TTLC) of 1,000 mg/l and the PRG for industrial soil of 750 mg/kg. Re-analysis of the soil sample for lead showed a total lead concentration of 98.6 mg/kg, which indicated a metal flake or artifact was likely present in the first sample. The result of the California Waste Extraction Test (WET) procedure for soluble lead on the sample that contained 4,700 mg/kg of total lead was 5.33 mg/l, which is marginally above the Soluble Threshold Limiting Concentration (STLC) of 5 milligram per liter (mg/l) concentration. When the same sample was subjected to the Toxicity Characteristic Leaching Procedure (TCLP), the soluble lead concentration detected (0.164 mg/l) was below the TCLP limit of 5 mg/l.

  At five locations in the North Parcel and twelve locations in the South parcel, the total lead concentrations exceeded 10 times (10x) the STLC of 5 mg/l. The soil samples that exceeded 10x the STLC for lead were subjected to the WET procedure for soluble lead. At two locations in the North Parcel and ten locations in the South Parcel the soluble lead exceeded 5 mg/l based upon the WET

procedure. Most of the soluble lead concentrations were marginally above the 5 mg/l concentration except that one location in North Parcel showed a soluble lead value of 59.5 mg/l and two locations in the South parcel showed concentrations of 35.6 mg/l and 25.2 mg/l.

At two locations in the North Parcel and seven locations in the South parcel, the total lead concentrations exceeded 20x the TCLP concentration of 5 mg/l. None of the soil samples that were subjected to the TCLP exceeded the 5 mg/l concentration for soluble lead.

BACKGROUND NOISE

Considering that the elevated lead concentrations are distributed over a relatively wide area of both parcels, the presence of lead may be due to urban background contributions, rather than a direct chemical release from a historic operation and/or waste management feature. The total lead findings for this investigation are consistent with those previously reported by HartCrowser (1994). Further, the concentrations of lead found at the Site in this investigation are generally consistent with the urban and regional background values quoted by HartCrowser (1994 and 1995). Tables and figures from HartCrowser's report are included in Appendix D.

BARELY GLOT!! DIRT LEAD

It is reasonable to conclude in general that the lead concentrations at the Site do not exceed the PRG for industrial soil. However, soluble lead concentrations exceeding the STLC of 5 mg/l as measured by the WET procedure may be classified as a California hazardous waste (if the soil were to be excavated) for purposes of transportation and disposal.

- Arsenic – This metal was detected above the detection limit of 0.75 mg/kg in the majority of samples. One sample had a total arsenic concentration of 50.5 mg/kg, which slightly exceeded 10x the STLC of 5 mg/l for arsenic. When this sample was subjected to the WET procedure for the determination of soluble arsenic, the soluble arsenic concentration was 1.9 mg/l. Additionally, a number of soil samples contained total arsenic at levels exceeding the PRG of 1.6 mg/kg for industrial soil.

Considering that the elevated arsenic concentrations are distributed over a relatively wide area of both parcels, the presence of arsenic (much like lead) may be due to urban background contributions, rather than a direct chemical release from a historical operation and/or waste management feature. As was the case with total lead, the total arsenic findings for this investigation are consistent with those previously reported by HartCrowser (1994 and 1995). Further, the concentrations of arsenic found at the Site in this investigation are generally consistent with the regional background value of 8.3 mg/kg quoted by HartCrowser (1995).

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None of the total or soluble arsenic concentrations detected would cause the soil to be classified as a California or USEPA hazardous waste (if the soil were to be excavated) for purposes of transportation and disposal. Exceedances of arsenic concentrations above the PRG for industrial soil may require that the soil be further evaluated for potential environmental concerns. However, it should also be noted that EPA Region 9 (author of the PRGs) recognizes that some PRG levels have been set at or below typical background concentrations. An example of this is naturally occurring arsenic in soils that frequently exceed the PRG that EPA Region 9 has established for arsenic. EPA has at times used the non-cancer PRG of 22 mg/kg to evaluate sites, recognizing that this value tends to be above background levels yet still falls within the range of soil concentration (0.39-39 mg/kg) that equates to EPA's acceptable cancer risk range.

- **Barium, Copper, and Zinc** - One surface sample in the North Parcel contained total barium and zinc concentrations of 11,300 and 23,700 mg/kg, respectively, which exceeded their respective TTLCs of 10,000 and 5,000 mg/kg. Re-analysis of this sample showed lower total barium and zinc concentrations of 2,880 and 2,490 mg/kg, respectively. Analysis of the 3-ft sample at this location showed total concentrations of barium and zinc at 143.0 and 58.8 mg/kg, respectively.

  The surface soil sample was subjected to the WET procedure for soluble barium and zinc. The result of the WET procedure for soluble barium and zinc on NHA10-0.5' was 23.4 mg/l and 309.0 mg/l, respectively. Further, since the total barium concentration in NHA10-0.5' exceeded 20x the TCLP concentration of 100 mg/l, the sample was subjected to the TCLP. The resulting soluble barium concentration was 1.7 mg/l, which is below the TCLP of 100 mg/l.

  One soil sample in the North Parcel contained a total copper concentration of 474.0 mg/kg, which exceeded 10x the STLC of 25 mg/l. This soil samples was subjected to the WET procedure for soluble copper. The soluble lead concentration was 3.13 mg/l, which is below the STLC value for this compound.

  It is reasonable to conclude in general that the barium, copper, and zinc concentrations at the Site do not exceed their respective PRG for industrial soil. However, total barium, soluble barium, and total zinc concentrations in sample NHA10-0.5 may be classified as a California hazardous waste (if the soil were to be excavated) for purposes of transportation and disposal.

Hexavalent Chromium was detected at very low levels in 31 of 35 samples over a wide area of the Site. All of these results are identified as "J" (i.e. the data is qualifiable but not quantifiable) values by the laboratory. The concentrations of hexavalent chromium reported were 1) well below the PRG for industrial soil, and 2) would not be classified as a hazardous waste based upon applicable rules and regulations.

Organochlorine Pesticides were detected at very low levels in four samples over a wide area of the Site. The concentrations of the organochlorine pesticides reported were well below the respective PRGs for industrial soil, and would not be classified as a hazardous waste based upon applicable rules and regulations.

PCB (arochor-1254) was detected at very low levels in two samples located in the southwestern quarter of the Site. The concentrations of the PCBs reported were well below the PRG for industrial soil and would not be classified as a hazardous waste based upon applicable rules and regulations.

Herbicides were not detected above laboratory reporting limits in any of the samples analyzed.

Inaccessible areas of the Site were fenced-off and secured by locked gates. Because these target areas could not be investigated, assessment should be conducted in the future when access is available.

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2.0 INTRODUCTION

This report presents the results of a surface and subsurface soil investigation performed by Pacific Edge on the Site located in Los Angeles, California. The purpose of the investigation was to evaluate surface and subsurface soils for the presence of hazardous waste. The sampling activities were performed on August 28, September 2, September 4, and September 9, 2003. This work was conducted at the request of Port of Los Angeles (Port) Environmental Management Division (EMD) and the City Attorney's Office.

2.1 SITE LOCATION

The Site consists of approximately 13 acres and is bounded by East 41st Street on the south, East Martin Luther King Jr. Boulevard on the north, South Alameda Street on the east and East Long Beach Avenue on the west in the City of Los Angeles. The Site is bisected by East 40th Place. A site location map is presented as Figure 1. A map of the Site, which includes details of the Site, is presented as Figure 2.

Assessor parcel maps (5117-19, 5117-20, and 5117-21, all dated 1996) and information obtained from the County of Los Angeles web site (http://assessormap.lacountyassessor.com/mapping) on August 13, 2003 indicates that the current addresses for the Site include:

- 1701, 1715, 1727, 1751, 1757, 1763, 1769, 1773, and 1801 41st Street, 4(1835), 5,
- 1720, 1721, and 1883 40th Street
- 4051 and 4073 Alameda Street A1, A2,
- 1838 Martin Luther king Jr. Boulevard

Addresses were not specified for all parcels on the County of Los Angeles web site. Copies of the 1996 Assessor Parcel Maps are included in Appendix A.

2.2 SITE DESCRIPTION

An initial site visit was performed on August 6, 2003. The Site, approximately 13 acres in size, is divided into two relatively equal portions by East 40th Place. Access by vehicle to the Site is on 40th Place off of East Long Beach Avenue. The area north of East 40th Place is referred to as the North Parcel with the area south of East 40th Place being the South Parcel. Additional access points for pedestrians were noted periodically along the fenced perimeter of the Site.

The entire 13 acres has been divided up into garden plots administered by the Los Angeles Regional Food Bank. Access to each of the plots is by narrow paths that dissect the Site. A small sign, titled Urban Garden Lot, with a name and lot number was affixed to some of the garden plots. Each plot was fenced with the majority of the lots being locked.

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2.3 BACKGROUND

Background information for the Site was obtained from documents supplied by the Port EMD. The documents reviewed and a summary of background information from these documents includes:

Preliminary Site Assessment, Lancer Site, Los Angeles, California, dated April 1993, prepared by Montgomery Watson (Montgomery) contained the following findings:

- Light industrial operations, which may have included solvents, paints, and other flammable materials, began in the 1920s on both 6.5-acre parcels.
- Site demolition activities in 1990 in the vicinity of four areas of surficial discoloration resulted in the removal of two clarifiers, a concrete pit, and discolored soil. Montgomery reports that the vertical extent of remediation appears to be adequate based upon confirmation samples at the bottom of the excavation. Further, Montgomery indicates that the lateral extent of remediation was apparently determined by field observations without confirmation sampling.
- An underground storage tank (UST) may be located at the former Universal Truck Body, also called Utility Trailer Sales Company, property in the southeast corner of the South 6.5-acre parcel, based upon a City of Los Angeles Fire Department violation.
- A UST is likely located beneath the north 6.5-acre parcel, on the south curb of Martin Luther King Jr. Blvd., approximately 388 feet west of South Alameda.

Preliminary Health Risk Evaluation of Gardening Uses, Lancer Site, dated September 16, 1994, prepared by HartCrowser, Inc. HartCrowser collected soil samples at the South 6.5-acre parcel. The samples were analyzed for metals and semivolatile organics. A summary of HartCrowser's findings were as follows:

- Chemicals detected in soils include metals and SVOCs.
- Metals and PAH concentrations are typical of urban soils.
- Lead is the primary concern for potential health impacts.
- Lead levels over most of the property are acceptable for gardening, but a limited number of samples from both parcels exceeded acceptable limits.
- Concentrations of other metals appear to be acceptable.
- SVOCs do not appear to be a major concern, but confirmation sampling is needed.
- HartCrowser recommended the confirmatory sampling for elevated lead and semivolatiles be performed.

Preliminary Health Risk Evaluation, Lancer Site, Los Angeles, California, dated January 18, 1995, prepared by HartCrowser, Inc. HartCrowser collected and analyzed samples on all parcels for metals, SVOCs, VOCs, total recoverable petroleum hydrocarbons, and total volatile hydrocarbons. HartCrowser's findings were as follows:

- Shallow soil at the Lancer Site showed elevated concentrations of metals and SVOCs that are above published background levels. No indication of chemical spills or other industrial releases was determined to have caused the elevated levels of contaminants.
- Detected chemicals pose minimal health risks if the following recommendations are implemented: a) future construction activities should utilize appropriate personal protective equipment; and b) diesel product should be removed from the identified UST.
- A UST fill-port was identified on the North Parcel in the sidewalk area adjacent to Martin Luther King Boulevard. Additional USTs are not likely to be present beneath the 6.5-acre parcels, based on

the findings of the geophysical survey and information provided in Montgomery's 1993 Preliminary Site Assessment (HartCrowser, 1995).

Underground Storage Tank Closure Report, Port of Los Angeles, Lancer Site, 1786 East Martin Luther King Jr. Boulevard, Los Angeles, California, dated June 1996, prepared by HartCrowser, Inc.

- HartCrowser closed the subject UST in accordance with the City of Los Angeles Fire Department requirements.

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3.0 SITE INVESTIGATION

Pacific Edge's approach and rationale for this soil investigation included the following key considerations:

- HartCrowser's investigation (1994) utilized a random grid sampling approach, which indicated elevated concentrations of total lead and arsenic in surface soil. Based upon a review of previous investigations and historical information, Pacific Edge proposed:
  - Additional sampling of surface and subsurface soil using a similar grid sampling approach to confirm the elevated lead and arsenic concentrations, and
  - Assess other areas of potential concern.

- Analysis of the 0.5-foot (ft) depth soil sample for TPH, SVOCs, metals, hexavalent chromium, organochlorine pesticides and PCBs, and herbicides was considered to be representative of the surface soil. Deeper samples were only analyzed if the sample from a shallower depth showed an abnormally high chemical concentration, or if the feature being assessed was expected to impact at greater depths. Due to the typical disturbance of surface soil, and the associated volatilization of chemicals, the 5.0 ft sample was analyzed to represent the concentration of VOCs present at the Site in near surface soil.

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3.1 INVESTIGATION AREAS

The areas of potential environmental concern at the Site were identified in the environmental documents supplied by the POLA (see Section 2.3). Areas previously identified by Montgomery and/or HartCrowser as potential chemical source areas are included in Table 1. A summary of these areas is presented below:

- Area 1 – Surface Soil Discoloration
- Area 2 – Surface Soil Discoloration
- Area 3 – Clarifier
- Area 4 - Clarifier
- Area 5 – Concrete Lined Pit
- Bryant Die Casting (Former Die Casting Area), 1763 East 41st Street
- Universal Truck Body, Inc. (former truck repair area), 1845 East 41st Street
- Metal Products Engineering, 4000 East Long Beach Avenue
- Former Painting Area, 1808 40th Place
- Former Varnish Room Area, 1814 40th Place
- Former Plywood Gluing and Drying Area, 1786 Martin Luther King Jr. Boulevard
- Former Cabinet Finishing & Painting Area, 1840 Martin Luther King Jr. Boulevard
- Adjacent Oil Pipelines located along Long Beach Avenue
- Elevated Lead and polynuclear aromatic hydrocarbons detected in 1994 grid samples.

Copies of Sanborn Maps (also known as Fire Insurance Maps) for the Site were requested from Environmental Data Resources, Inc. (EDR) and were used to locate areas with addresses. Upon review of the 1920, 1949, 1953, 1954, 1958, 1960, 1963, and 1968 Sanborn Maps, the following additional potential source areas were identified:

- Carpet Cleaning - between 4014 and 4022 East Long Beach Avenue (1949 Sanborn Map)
- Oil Storage - between 1750 and 1770 Martin Luther King, Jr. Boulevard (formerly East Santa Barbara Avenue; 1949 Sanborn Map)
- Metal Cast & Pattern Shop – 1707 and 1709 East 41st Street (1949, 1960, and 1963 Sanborn Map)
- Foundry – 1715 East 41st Street (1949 and 1960 Sanborn Map)
- Gas and Oil – 4050 East Long Beach Avenue (1963 Sanborn Map)

Figure 2 graphically presents these potential areas of concern. Copies of the Sanborn Maps are included in Appendix B.

3.2 SOIL SAMPLING

A total of 24 Geoprobe® and 32 handauger borings were installed on August 28, September 2, September 4, and September 9, 2003. Table 2 summarizes the areas of concern, boring identification numbers, sample depth intervals, and the analytical procedure(s) performed. Figure 3 graphically presents the boring locations.

In summary, the investigation consisted of the collection and/or analysis of 187 soil samples (collected from depths of 0.5 feet below ground surface (bgs) to 15 feet bgs. The soil samples were collected using a Geoprobe® or hand auger equipment. The soil samples were collected with 1-inch diameter decontaminated brass, stainless steel, or acetate sleeves. Sub-samples were collected from select sleeves with an Encore Sampler for intervals identified for volatile organic compound analyses. Two 5 gram and one 25 gram Encore soil sample were collected for each analysis by EPA Method 8260B. Encore samples were collected following procedures in accordance with the DTSC's Hazardous Material laboratory Standard Operating Procedure 732-S. The ends of all sample sleeves selected for analysis were covered with Teflon sheets and capped with tightly-fitting plastic caps. These sleeves and Encore sample containers were then properly labeled, stored on ice, and delivered to the laboratory under chain-of-custody procedures.

Excess soil from each sample interval was reserved for soil headspace screening and site lithologic logging in accordance with the Uniform Soil Classification System. For headspace analysis, a small amount of soil collected from each depth interval was removed from the remaining sample sleeves and sealed in a Ziplock™ bag. After drilling and sampling of the borehole was completed, the Ziplock™ bags were placed in the sun for approximately 10 minutes. Headspace organic vapor concentrations were then measured by inserting the probe of a photoionization detector (PID) into the bag. PID readings were recorded on the boring logs. The remainder of the soil was observed for lithologic logging.

All equipment used for sampling was decontaminated between uses by washing with detergent (Alconox™), followed by a rinse in tap water and a final distilled water rinse.

Geoprobe® boreholes were properly abandoned by filling the borehole with bentonite chips, hydrating the chips with water, and resurfacing with material to match the existing surface. Hand auger borings were abandoned by replacing the removed soil into the borehole, compacting the soil, and resurfacing with material to match the existing surface.

3.3 SOIL ANALYTICAL

Soil samples were selected for laboratory analysis based on predetermined sample intervals, which were subject to field modification based on PID readings and/or observed discoloration or odor. Soil samples selected for analysis (see Table 2) were analyzed using one or more of the following methods:

- TPH Full Carbon Chain (EPA Method 8015M)
- SVOCs (EPA Method 8270C)
- VOCs (EPA Methods 5035/8260B)
- Total Metals (CCR Title 22 Metals)
- Hexavalent Chromium (EPA Method 7199 with alkaline digestion)
- Organochlorine Pesticides & PCBs (EPA Method 8081A/8082)
- Herbicides (EPA Method 8151)

Soluble metal concentrations were determined using the California Waste Extraction Test for metal constituents where the total metal concentration exceeds 10x the Soluble Threshold Limit Concentrations or 20x the Toxicity Characteristic Leaching Procedure limiting concentration.

Calscience Environmental Laboratories, Inc, a California State certified laboratory, located at 7440 Lincoln Way, Garden Grove, California performed the analytical methods on the soil samples. Laboratory analyses were performed consistent with USEPA Region 9's most recent guidance for non-CLP laboratories.

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4.0 ANALYTICAL RESULTS

The sections below provide a summary of the soil sample results. Tables 3 through 8 present soil analytical results. Calscience Environmental Laboratories, Inc, a California State certified laboratory, located at 7440 Lincoln Way, Garden Grove, California, performed the analytical methods on the soil samples. Laboratory analytical reports and chain-of-custody forms for the soil samples are included in Appendix C.

4.1 TPH FULL CARBON CHAIN (EPA METHOD 8015M)

Table 3 presents the TPH concentrations in soil. A summary of the TPH results is presented below:

- Fifty-three (53) soil samples were analyzed for Total TPH (C7-C44) compounds. The samples were collected from depths of 0.5-ft bgs (20 samples), 5-ft bgs (9 samples), 10-ft bgs (15 samples), and 15-ft bgs (9 samples).
- Twenty-one (21) samples showed Total TPH concentrations above laboratory reporting limits, ranging from 6.8 to 550 mg/kg.
- Most TPH compounds detected were in the C30+ range and were present in the 0.5-ft samples.
- For samples analyzed from the depths below 0.5-ft bgs, TPH concentrations ranged from non detect to 6.9 mg/kg.

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4.2 SVOCs (EPA METHOD 8270C)

Table 4a presents detected SVOC concentrations. Table 4b presents all SVOC compounds for the samples analyzed. A summary of the SVOC results is presented below:

- Twenty-six (26) soil samples were analyzed for SVOCs. The samples were collected from depths of 0.5-ft bgs (20 samples), 5-ft bgs (3 samples), and 15-ft bgs (3 samples).
- Twelve (12) of these soil samples, which were at the 0.5 ft depth, showed detectable quantities of SVOCs above laboratory reporting limits. No detectable quantities of SVOCs were found in the 5-ft bgs or 15-ft bgs soil samples analyzed.
- The compounds detected above laboratory reporting limits include benzo(a)anthracene, benzo(a)pyrene, benzo(b)fluoranthene, benzo(g,h,i)perylene, benzo(k)fluoranthene, bis(2-Ethylhexyl)phthalate, chrysene, di-n-butylphthalate, fluoranthene, indeno(1,2,3-c,d)pyrene, napthalene, phenanthrene, and pyrene. The detected concentrations are presented in Tables 4a and 4b.
- Some SVOC were reported as "J" values by the laboratory indicating that the analyte was detected above the Method Detection Limit (indicating the analyte can be qualified) but below the Reporting Limit (indicating the analyte is not quantifiable). The detected "J" value is an estimated concentration and is presented in Tables 4a and 4b.

4.3 VOCs (EPA METHODS 5035/8260B)

Table 5a presents detected VOC concentrations. Table 5b presents all VOC compounds for the samples analyzed. A summary of the VOC results is presented below:

- Fifty-three (53) soil samples were analyzed for VOCs. The samples were collected from depths of 5-ft bgs (29 samples), 10-ft bgs (15 samples), and 15-ft bgs (9 samples).
- Forty-one (41) of these samples showed detectable quantities of one or more VOCs above laboratory reporting limits.

- The compounds detected above laboratory reporting limits are acetone, benzene, tetrachloroethene, and toluene. The detected concentrations are presented in Tables 5a and 5b.
- VOCs (acetone, benzene, and toluene) at concentrations below or near the analytical reporting limits were detected in most 5-ft depth soil samples. Analytical method blanks did not detect these VOCs.
- Tetrachloroethene was detected in the concentration range of 1.2 to 5.4 ug/kg in a few soil samples.
- Some VOCs (1,2,3-TCP, 2-butanone, and trichloroethene) were reported as "J" values by the laboratory indicating that the analyte was detected above the Method Detection Limit (indicating the analyte can be qualified) but below the Reporting Limit (indicating the analyte is not quantifiable). The detected "J" value is an estimated concentration and is presented in Tables 5a and 5b.

4.4 TOTAL METALS (CCR TITLE 22 METALS)

Table 6 presents the metal concentrations in soil. Figure 4 illustrates lead and arsenic concentrations in soil. A summary of the metal results is presented below:

- Forty-one (41 samples) were analyzed for total metals. The samples were collected from depths of 0.5-ft bgs (35 samples) and 15-ft bgs (6 samples). Two additional samples from a depth of 3-ft bgs were analyzed for selected metal compounds.
- Metals at various concentrations were detected in all soil samples.
- Soil sample NHA7-0.5' collected in the North Parcel contained a total lead concentration of 4,700 mg/kg, which exceeds its TTLC value of 1,000 mg/l. The 3 ft sample at this location contained a lead concentration of 19.6 mg/kg. NAH7-0.5' was re-analyzed (NAH7-0.5'RA) and the total lead concentration was reported by the laboratory to be 98.6 mg/kg, which is significantly below its TTLC value. The result of the WET procedure for soluble lead on the sample that contained 4,700 mg/kg of total lead was 5.33 mg/l, which is marginally above the STLC of 5 mg/l concentration. When the same sample was subjected to the TCLP, the soluble lead concentration detected (0.164 mg/l) was below the TCLP limit of 5 mg/l.
- At five locations in the North Parcel and twelve locations in the South Parcel, the total lead concentration exceeded 10x the STLC of 5 mg/l. These samples were subjected to the WET procedure for soluble lead, resulting in twelve samples exceeding the lead STLC value of 5mg/l (two samples from the North Parcel and ten samples from the South Parcel). Most of the soluble lead concentrations were marginally above the 5 mg/l concentration except that one location in North Parcel showed a soluble lead value of 59.5 mg/l and two locations in the South parcel showed concentrations of 35.6 and 25.2 mg/l.
- At two locations in the North Parcel and seven locations in the South Parcel, the total lead concentration exceeded 20x the TCLP value of 5 mg/l. These samples were subjected to the TCLP test and none of the results exceeded the TCLP value of 5 mg/l.
- The total arsenic concentration in soil sample SHA6-0.5' exceeded 10x the STLC of 5 mg/l. When this sample was subjected to the WET procedure, the soluble arsenic concentration was reported to be 1.9 mg/L At five locations in the North Parcel and eighteen (18) locations in the South parcel, the total arsenic concentrations exceeded the PRG of 1.6 mg/kg for industrial soil.
- Soil sample NAH10-0.5'in the North Parcel at 0.5-ft contained total barium and zinc concentrations of 11,300 and 23,700 mg/kg, respectively, which exceed the TTLC value for barium and zinc. Re-analysis of this sample (NHA10-0.5'RA) showed a total barium and zinc concentrations of 2,880 and 2,490 mg/kg, respectively, which is below the TTLC values. Analysis of the 3-ft sample at this location showed concentrations of barium and zinc at 143.0 and 58.8 mg/kg, respectively.
- Soil sample NHA10-0.5' was subjected to the WET procedure due to an elevated concentration of barium and zinc and the TCLP test due to the elevated barium concentration. The barium results were

significantly below its STLC and TCLP values of 100 mg/l. The zinc results indicated a soluble zinc concentration of 309 mg/l, which exceeds its STLC value of 250 mg/l.

- One soil sample (NHA7-0.5') in the North Parcel contained a total copper concentration of 474.0 mg/kg, which exceeded 10x the STLC of 25 mg/l. This soil samples was subjected to the WET procedure for soluble copper. The soluble copper concentration was 3.13 mg/l, which is below the STLC value for this compound.
- Some metals were reported as "J" values by the laboratory indicating that the analyte was detected above the Method Detection Limit (indicating the analyte can be qualified) but below the laboratory reporting limit (indicating the analyte is not quantifiable). The detected "J" value concentrations are presented in Table 6.

4.5 Hexavalent Chromium (EPA Method 7199 with alkaline digestion)

Table 6 also presents the hexavalent chromium concentrations in soil. A summary of the metal results is presented below:

- Thirty-five (35) soil samples were analyzed for hexavalent chromium. All of these soil samples were collected from a depth of 0.5-ft bgs.
- Thirty-one (31) of these samples were reported to contain hexavalent chromium, ranging from 0.01 to 0.53 mg/kg. All of these results were identified as "J" values by the laboratory indicating that the analyte was detected above the method detection limit (indicating the analyte can be qualified) but below the Reporting Limit (indicating the analyte is not quantifiable). The detected "J" value concentrations are presented in Table 6.
- The remaining four samples were reported as non-detect above the laboratory reporting limit.

4.6 Organochlorine Pesticides (EPA Method 8081A)

Table 7 presents the organochlorine pesticide concentrations in soil. A summary of these results are presented below:

- Twenty (20) soil samples were analyzed for organochlorine pesticides. All of these soil samples were collected from a depth of 0.5-ft bgs.
- Four (4) of these samples showed very low levels of organochlorine pesticides.
- The compounds detected above laboratory reporting limits include 4,4'-DDD, 4,4'-DDE, 4,4'-DDT, and Chlordane.
- Some pesticide compounds were reported as "J" values by the laboratory indicating that the analyte was detected above the Method Detection Limit (indicating the analyte can be qualified) but below the Reporting Limit (indicating the analyte is not quantifiable). The detected "J" value concentrations are presented in Table 7.

4.7 PCBs (EPA Method 8082)

Table 7 presents the PCB concentrations in soil. A summary of these results are presented below:

- Twenty (20) soil samples were analyzed for PCBs. All of these soil samples were collected from a depth of 0.5-ft bgs.
- Two (2) of these samples showed low levels of aroclor-1254 (170 ug/kg and 370 ug/kg) above laboratory reporting limits.

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4.8 HERBICIDES (EPA METHOD 8151)

Table 8 presents the herbicide concentrations in soil. A summary of these results are presented below:

- Twenty (20) soil samples were analyzed for herbicides. All of these soil samples were collected from a depth of 0.5-ft bgs.
- None of the samples contained reportable concentrations of herbicide compounds.

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5.0 DISCUSSION OF RESULTS AND CONCLUSIONS

5.1 TPH FULL CARBON CHAIN (EPA METHOD 8015M)

- TPH compounds were detected at very low levels in a majority of the samples analyzed.
- The highest TPH concentration for the sum of hydrocarbon compounds with carbon chain lengths of 7 to 44 (C7-C44) was 550 mg/kg in a 0.5-ft soil sample (most TPH compounds were detected in the C30+ range).
- None of the analytical results for shallow soil samples was high enough to justify the testing of deeper soil samples.
- None of the analytical results for TPH indicate 1) any significant release of hydrocarbon based materials, or 2) levels which would cause the impacted soil to require removal from the Site based upon applicable rules and regulations.

5.2 SVOCs (EPA METHOD 8270C)

- SVOCs were not detected in a majority of soil samples analyzed. A few samples contained low levels of PAHs and phthalates (di-n-octyl phthalate and BEP).
- None of the analytical results for shallow soil samples was high enough to justify the testing of deeper soil samples.
- None of the analytical results indicate any significant release of SVOCs.
- None of these samples contained measurable concentrations of SVOCs (PAHs or phthalates) that 1) were above their respective PRGs for industrial soil, or 2) would cause the soil to be classified as a hazardous waste based upon applicable rules and regulations.

5.3 VOCs (EPA METHODS 5035/8260B)

- VOCs (acetone, benzene, and toluene) at concentrations below or near the analytical reporting limits were detected in most 5-ft depth soil samples. Analytical method blanks did not detect these VOCs
- Tetrachloroethene was detected at concentrations of approximately 1.2 to 5.4 ug/kg in a few soil samples.
- None of the analytical results indicate any significant release of VOCs.
- All VOC concentrations were well below the respective PRG for industrial soil and would not be classified as a hazardous waste based upon applicable rules and regulations.

5.4 TOTAL METALS (CCR TITLE 22 METALS)

Metals at various concentrations were detected in all soil samples. Elevated levels of total lead and arsenic were reported in a number of samples from the site. A few samples contained elevated levels of barium, copper, and/or zinc. Results and conclusions associated with lead, arsenic, barium, copper, and zinc are presented below.

5.4.1 Lead

- Only one soil sample (NHA7-0.5') from the North Parcel had a concentration of total lead (4,700 mg/kg) above the TTLC of 1,000 mg/l and the PRG for industrial soil of 750 mg/kg. Re-analysis of the soil sample for lead showed a total lead concentration of 98.6 mg/kg, which indicated a metal

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flake or artifact was likely present in the first sample. The result of the WET procedure for soluble lead on the sample that contained 4,700 mg/kg of total lead was 5.33 mg/l, which is marginally above the STLC of 5 mg/l concentration. When the same sample was subjected to the TCLP, the soluble lead concentration detected (0.164 mg/l) was below the TCLP limit of 5 mg/l.

- At five locations (including NHA7-0.5' discussed above) in the North Parcel and twelve locations in the South parcel, the total lead concentrations exceeded 10x the STLC of 5 mg/l. The soil samples that exceeded 10x the STLC for lead were subjected to the WET procedure for soluble lead. At two locations in the North Parcel and ten locations in the South Parcel the soluble lead exceeded 5 mg/l based upon the WET procedure. Most of the soluble lead concentrations were marginally above the 5 mg/l concentration except that one location in North Parcel showed a soluble lead value of 59.5 mg/l and two locations in the South parcel showed concentrations of 35.6 mg/l and 25.2 mg/l.
- At two locations in the North Parcel and seven locations in the South parcel, the total lead concentrations exceeded 20x the TCLP concentration of 5 mg/l. None of the soil samples that were subjected to the TCLP exceeded the 5 mg/l concentration for soluble lead.

Considering that the elevated lead concentrations are distributed over a relatively wide area of both parcels, the presence of lead may be due to urban background contributions, rather than a direct chemical release from a historic operation and/or waste management feature. The total lead findings for this investigation are consistent with those previously reported by HartCrowser (1994). Further, the concentrations of lead found at the Site in this investigation are generally consistent with the urban and regional background values quoted by HartCrowser (1994 and 1995). Tables and figures from HartCrowser's report are included in Appendix D.

LEAD

It is reasonable to conclude in general that the lead concentrations at the Site do not exceed the PRG for industrial soil. However, soluble lead concentrations exceeding the STLC of 5 mg/l as measured by the WET procedure may be classified as a California hazardous waste (if the soil were to be excavated) for purposes of transportation and disposal.

5.4.2 Arsenic

- Arsenic was detected above the detection limit of 0.75 mg/kg in the majority of samples. One sample (SHA6-0.5') had a total arsenic concentration of 50.5 mg/kg, which slightly exceeded 10x the STLC of 5 mg/l for arsenic. When this sample was subjected to the WET procedure for the determination of soluble arsenic, the soluble arsenic concentration was 1.9 mg/l.
- A number of soil samples contained total arsenic at levels exceeding the PRG of 1.6 mg/kg for industrial soil.

Considering that the elevated arsenic concentrations are distributed over a relatively wide area of both parcels, the presence of arsenic (much like lead) may be due to urban background contributions, rather than a direct chemical release from a historical operation and/or waste management feature. As was the case with total lead, the total arsenic findings for this investigation are consistent with those previously reported by HartCrowser (1994 and 1995). Further, the concentrations of arsenic found at the Site in this investigation are generally consistent with the regional background value of 8.3 mg/kg quoted by HartCrowser (1995).

OK. FOR EXPOSURE

None of the total or soluble arsenic concentrations detected would cause the soil to be classified as a California or USEPA hazardous waste (if the soil were to be excavated) for purposes of transportation and disposal. Exceedances of arsenic concentrations above the PRG for industrial soil may require that the soil be further evaluated for potential environmental concerns. However, it should also be noted that EPA

Region 9 (author of the PRGs) recognizes that some PRG levels have been set at or below typical background concentrations. An example of this is naturally occurring arsenic in soils that frequently exceed the PRG that EPA Region 9 has established for arsenic. EPA has at times used the non-cancer PRG of 22 mg/kg to evaluate sites, recognizing that this value tends to be above background levels yet still falls within the range of soil concentration (0.39-39 mg/kg) that equates to EPA's acceptable cancer risk range.

5.4.3 Barium, Copper, and Zinc

- One sample (NHA10-0.5') in the North Parcel contained total barium and zinc concentrations of 11,300 and 23,700 mg/kg, respectively, which exceeded their respective TTLCs of 10,000 and 5,000 mg/kg. Re-analysis of this sample showed lower total barium and zinc concentrations of 2,880 and 2,490 mg/kg, respectively. Analysis of the 3-ft sample at this location showed total concentrations of barium and zinc at 143.0 and 58.8 mg/kg, respectively.
- The NHA10-0.5' soil sample was subjected to the WET procedure for soluble barium and zinc. The result of the WET procedure for soluble barium and zinc on NHA10-0.5' was 23.4 mg/l and 309.0 mg/l, respectively. Further, since the total barium concentration in NHA10-0.5' exceeded 20x the TCLP concentration of 100 mg/l, the sample was subjected to the TCLP. The resulting soluble barium concentration was 1.7 mg/l, which is below the TCLP of 100 mg/l.
- One soil sample (NHA7-0.5') in the North Parcel contained a total copper concentration of 474.0 mg/kg, which exceeded 10x the STLC of 25 mg/l. This soil samples was subjected to the WET procedure for soluble copper. The soluble copper concentration was 3.13 mg/l, which is below the STLC value for this compound.

It is reasonable to conclude in general that the barium, copper, and zinc concentrations at the Site do not exceed their respective PRG for industrial soil. However, total barium, soluble barium, and total zinc concentrations in sample NHA10-0.5 may be classified as a California hazardous waste (if the soil were to be excavated) for purposes of transportation and disposal.

5.5 Hexavalent Chromium (EPA Method 7199 with alkaline digestion)

- Hexavalent chromium was detected at very low levels over a wide area of the Site. All detections were reported as qualifiable but not quantifiable (concentrations detected were below the reporting limit but above the method detection limit) by the laboratory.
- The concentrations of hexavalent chromium reported were well below the PRG for industrial soil.

5.6 Organochlorine Pesticides (EPA Method 8081A)

- Organochlorine Pesticides were detected at very low levels in a few samples from the Site.
- The concentrations of the organochlorine pesticides reported were well below the respective PRGs for industrial soil and would not be classified as a hazardous waste based upon applicable rules and regulations.

5.7 PCBs (EPA Method 8082)

- PCBs were detected at very low levels in a few samples from the Site.
- The concentrations of the PCBs reported were well below the PRGs for industrial soil and would not be classified as a hazardous waste based upon applicable rules and regulations.

5.8 HERBICIDES (EPA METHOD 8151)

- Herbicides were not detected in any of the samples analyzed.

5.9 INVESTIGATION STATUS AT POTENTIAL AREAS OF CONCERN

The following table identifies the potential areas of concern and the status of investigation activities at each area. Inaccessible areas of the Site were fenced-off and secured by locked gates. Because these target areas could not be investigated, assessment should be conducted in the future when access is available.

Area of Potential Concern	Investigated
Area 1 – Surface Soil Discoloration	Yes
Area 2 – Surface Soil Discoloration	Yes
Area 3 – Clarifier	Yes
Area 4 - Clarifier	Yes
Area 5 – Concrete Lined Pit	Yes
Bryant Die Casting (Former Die Casting Area), 1763 East 41st Street	Yes
Universal Truck Body, Inc. (former truck repair area), 1845 East 41st Street	Yes
Metal Products Engineering, 4000 East Long Beach Avenue	No – Area not accessible.
Former Painting Area, 1808 East 40th Place	Yes
Former Varnish Room Area, 1814 East 40th Place	Yes
Former Plywood Gluing and Drying Area, 1786 East Martin Luther King Jr. Boulevard	Yes
Former Cabinet Finishing & Painting Area, 1840 East Martin Luther King Jr. Boulevard	Yes
Adjacent Oil Pipelines located along Long Beach Avenue	No – Area not accessible.
Grided Sample Locations	Yes
Carpet Cleaning - between 4014 and 4022 East Long Beach Avenue	No – Area not accessible.
Oil Storage - between 1750 and 1770 East Martin Luther King, Jr. Boulevard (formerly East Santa Barbara Avenue)	No – Area not accessible.
Metal Cast & Pattern Shop – 1707 and 1709 East 41st Street	No – Area not accessible.
Foundry – 1715 East 41st Street	No – Area not accessible.
Gas and Oil – 4050 East Long Beach Avenue	No – Area not accessible.

5.10 GENERAL SOIL LITHOLOGY

Twenty-nine (29) of the borings were terminated at approximately 5 feet bgs. Approximately fifteen of the borings were terminated at 10 feet bgs and nine (9) of the borings were terminated at approximately 15 feet bgs. The predominant soil lithology observed in the upper 5 feet of the borings was silty fine sands and sandy fine silts. Organic matter was noted in some of the 0.5-ft bgs samples and is likely due to

the addition of this material by the tenant gardeners. The predominant soil type at the 10 ft depth was sand with a few of the borings containing silts and clays at this depth. The samples from the 15 ft depths was primarily sand. Saturated soil conditions were not encountered in any of these shallow soil borings.

Soil boring logs are included in Appendix E. A soil boring log was generated for each borings in excess of 5 feet bgs. Representative boring logs were generated for groups of borings with a maximum depth of 5 ft bgs.

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6.0 LIMITATIONS

This document is prepared for the sole use and benefit of the Port of Los Angeles. Neither this report, nor any information contained herein, shall be used or relied upon by any person other than the Port of Los Angeles. The responsibility for making any disclosures or reports to any third party and for taking a corrective, remedial, or mitigative action shall be solely that of the Port of Los Angeles.

Our judgments and conclusions in this report are based upon the analytical data and information acquired during this investigation and our experiences on similar projects. It is possible that variations in surface and subsurface conditions exist beyond the points explored in this limited soil investigation. Further, changes in subsurface conditions found could occur at some time in the future due to variations in rainfall, temperature, land use (both on-site and off-site), or other factors. These changes can affect the behavior of materials and contaminants in soil and groundwater.

The data obtained from the collected samples does not preclude the presence of other chemical materials at the site that may or may not be considered chemical of concern. Further, changes in applicable regulatory standards periodically occur as a result of legislative actions and/or studies. This may result in the findings of this report being invalidated, wholly or in part, by changes beyond our control.

Opinions and judgments expressed within this report are based upon our understanding and interpretation of current regulatory standards and should not be used as legal opinions. The services provided for this project have been performed in accordance with the Scope of Work and the contract between Pacific Edge Engineering, Inc. and the Port of Los Angeles. The services performed have been conducted in a manner consistent with the level of care and skill ordinarily exercised by members of our profession currently practicing under similar conditions in Southern California. Pacific Edge Engineering, Inc. or Jenkins Environmental Associates makes no warranty, expressed or implied.

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Advantage Environmental Consultants, LLC

Privileged and Confidential Attorney-Client Communication
PHASE I/II ENVIRONMENTAL SITE ASSESSMENT

South Central Farms
Los Angeles, California 90058

AEC Project No. 06-027SD
May 25, 2006

Prepared for:

The Trust For Public Land
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San Francisco, CA 94105

Prepared by:

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ADVANTAGE
ENVIRONMENTAL
CONSULTANTS, LLC.

May 25, 2006

Aaron Friedland, Esq.
The Trust For Public Land
116 New Montgomery, 3rd Floor
San Francisco, California 94105

Subject: **Privileged and Confidential Attorney-Client Communication**
Phase I/II Environmental Site Assessment
South Central Farms Property
Los Angeles, CA 90058
AEC Project No. 06-027SD

Dear Mr. Friedland:

Advantage Environmental Consultants, LLC (AEC) has performed a Phase I/II Environmental Site Assessment (ESA) in conformance with the scope and limitations of ASTM Practice E 1527-00, of the above referenced property (i.e., "the Site"). This ESA included public environmental agency and historical record reviews, interviews, site observations, soil sampling/analysis and report preparation. This report includes AEC's findings, conclusions, recommendations, and supporting documentation.

We appreciate the opportunity to be of service to the Trust For Public Land. If you should have any questions regarding this report, or if we can be of further assistance, please contact Dan Weis at (760) 744-3363.

Sincerely,
ADVANTAGE ENVIRONMENTAL CONSULTANTS, LLC

Daniel Weis, REA I
Branch Manager
Western Regional Division

Michael R. Lewis, P.G.
Consulting Geologist

TABLE OF CONTENTS

1.0 EXECUTIVE SUMMARY 1

1.1 SUMMARY AND FINDINGS 1
1.2 CONCLUSIONS AND RECOMMENDATIONS 3

PHASE I ENVIRONMENTAL SITE ASSESSMENT

2.0 INTRODUCTION 4

2.1 PURPOSE 4
2.2 SCOPE OF SERVICES 4
2.3 LIMITATIONS AND EXCEPTIONS 5
2.4 USER RELIANCE 6

3.0 SITE DESCRIPTION 7

3.1 LOCATION AND LEGAL DESCRIPTION 7
3.2 CURRENT USE OF THE SITE 7
3.3 DESCRIPTION OF IMPROVEMENTS 7
3.4 CURRENT USES OF ADJOINING PROPERTIES 7

4.0 USER PROVIDED INFORMATION 9

4.1 REASON FOR PERFORMING PHASE I ESA 9
4.2 SPECIALIZED KNOWLEDGE 9
4.3 VALUATION REDUCTION FOR ENVIRONMENTAL ISSUES 9
4.4 TITLE RECORDS 9
4.5 ENVIRONMENTAL LIENS OR ACTIVITY AND USE LIMITATIONS 9
4.6 OWNER, PROPERTY MANAGER, AND OCCUPANT INFORMATION 9

5.0 RECORDS REVIEW 10

5.1 FEDERAL DATABASE REVIEWS 10
5.2 STATE DATABASE REVIEWS 12
5.3 Local Regulatory Agency Research 14
5.3.1 County/Local Health Department 14
5.3.2 City of Los Angeles Fire Department 14
5.4 PHYSICAL SETTING SOURCES 15
5.4.1 Topography and Hydrology 15
5.4.2 Geology 16
5.4.3 Hydrogeology 16
5.5 HISTORICAL USE INFORMATION 16
5.5.1 Previous Environmental Reports 16
5.5.2 Fire Insurance Maps 20
5.5.3 City Directories 22
5.5.4 State of California Division of Oil and Gas Records 23
5.5.5 Interview Information 23

6.0 SITE RECONNAISSANCE 24

6.1 METHODOLOGY AND LIMITING CONDITIONS 24
6.2 CHEMICAL STORAGE 24
6.3 WASTE GENERATION, STORAGE AND DISPOSAL 24
6.4 STORAGE TANKS 24

6.5 Polychlorinated Biphenyls (PCBs) 24
6.6 Other Conditions of Potential Concern 25

7.0 FINDINGS, CONCLUSIONS AND RECOMMENDATIONS OF THE PHASE I ESA 26

PHASE II ENVIRONMENTAL SITE ASSESSMENT

8.0 FIELD ACTIVITIES AND METHODOLOGY 27

8.1 Pre-Field Activities 27
8.2 Soil Sampling 27
8.3 Laboratory Analysis 28

9.0 RESULTS AND DISCUSSION 29

9.1 Subsurface Conditions 29
9.2 Analytical Laboratory Data 29

10.0 CONCLUSIONS OF THE PHASE II ESA 31

11.0 RECOMMENDATIONS AND LIMITATIONS OF THE PHASE II ESA 32

12.0 REFERENCES 33

APPENDICES

Appendix A – Vicinity Map
Appendix B – Site Plan
Appendix C – EDR Regulatory Database Report
Appendix D – City of Los Angeles Fire Department Records
Appendix E – Fire Insurance Maps
Appendix F – City Directories
Appendix G – Site Photographs
Appendix H – Tables of Analytical Data
Appendix I – Analytical Laboratory Report and Chain-of-Custody Documentation

1.0 Executive Summary

1.1 Summary and Findings

At the request of the Trust For Public Land, Advantage Environmental Consultants, LLC (AEC) conducted a Phase I/II Environmental Site Assessment (ESA), in conformance with the scope and limitations of ASTM Practice E 1527-00 (Phase I portion), of the South Central Farms property, located in the City of Los Angeles, California (hereinafter referred to as the "Site"). The Site is a 9.4-acre portion of the South Central Farms urban farm, bounded to the north by East Martin Luther King Boulevard, to the south by East 41st Street, to the east by South Alameda Street and to the west by Long Beach Avenue. East 40th Place traverses the central portion of the Site in an east-west direction. The Site is a portion of an urban farm utilized by local farmers and no habitable structures are present on the Site. No concerns with respect to hazardous waste/materials, storage tanks or other potential environmental conditions were noted during a site reconnaissance completed during the preparation of this assessment.

Portions of the Site have sustained decades (from at least the 1920s to early 1990s) of light-industrial use as indicated in historical fire insurance maps and city directories (refer to Sections 5.5.2 and 5.5.3). Numerous environmental investigations (refer to Section 5.1.1) have been conducted on the South Central Farms property from 1993 to 2003 and primarily targeted potential soil contamination in areas of former light-industrial activity and suspect underground storage tank (UST) areas. According to some of the prior environmental studies, areas of near-surface soil throughout much of the project Site are impacted with petroleum hydrocarbons (diesel fuel and oil) and heavy metals (particularly lead). However, the levels typically would not represent an imminent threat to the environment or persons working on the farm. Other contaminants found during prior studies included organochlorine pesticides and various volatile organic compounds (VOCs) and semi-volatile organic compounds (SVOCs). The levels of these compounds reported in the documents reviewed by AEC are considered to be low and were below applicable regulatory action levels. USTs were not found on the Site during the prior environmental studies but are present on some adjacent properties. Portions of the South Central Farms property within the subject Site boundaries that were referenced as remaining unassessed after completion of the prior assessments included a metal cast and pattern shop/foundry in the southwestern corner of the Site and a gasoline station at 4050 Long Beach Avenue (former address) located at the southeast corner of Long Beach Avenue and East 40th Place.

AEC reviewed Federal and State environmental databases provided by Environmental Data Resources (EDR) for information pertaining to documented and/or suspected releases of regulated hazardous substances and/or petroleum products within specified search distances. The Site was listed on a few of the regulatory databases. The listings generally did not indicate significant environmental concerns. A drycleaning facility was mapped at 1835 East 41st Street (southeast portion of the subject Site). Although this address is not one of the current Site addresses, it does fall within the range of potential

former addresses of the subject property. No violations are reported for this facility. If this portion of the Site was historically used as a drycleaner, adverse environmental conditions could be present in the subsurface in this area. Adjacent and nearby properties listed on various regulatory database are not considered a concern to the Site.

To address concerns pertaining to potential soil contamination at the Site, twelve soil borings were drilled at the Site under AEC oversight using direct push sampling equipment. Two of the borings were drilled to 20 feet below the ground surface at the former gasoline station area. The remaining 10 soil borings were drilled to three feet below existing grades at locations throughout the Site in a general grid pattern and served as a confirmatory assessment of near surface soils (compared to prior studies) and a screening level assessment of current soil conditions throughout the property. Four of the ten borings were drilled in areas to the north of East 40th Place and the remaining six borings were drilled in the southern portion of the site (south of East 40th Place). Two of the borings drilled in the southern portion of the Site also targeted the areas of concern of the former foundry and potential former drycleaner. Soil samples were collected at depths of 0.5 foot and 1.5, 3, 5, 10, 15 and 20 feet below grade in the two soil borings drilled at the former gasoline station. Soil samples were collected at depths of 0.5 foot, 1.5 feet and 3 feet below existing grades in the remaining soil borings. Initially, the analytical laboratories were instructed to composite every four 0.5-foot samples for petroleum hydrocarbons, metals and VOC analysis (total of three composite soil samples). In addition, select soil samples from greater depths at the former gasoline station were analyzed for petroleum hydrocarbons and VOCs. Remaining portions of the 0.5-foot deep samples and the additional soil samples obtained from the site were held at the analytical laboratories pending initial analysis.

Soil samples analyzed for petroleum hydrocarbons and VOCs did not exhibit levels at or above laboratory detection limits. A number of metals were detected in the soil samples collected as part of this investigation. The composite soil sample metal concentrations were compared to applicable risk-based regulatory criteria. Discrete surficial soil samples were also analyzed for arsenic, cadmium and lead based on the results of the composite testing effort. Additional discrete analysis of other metals was not warranted. Some of the levels of cadmium and lead exceeded conservative regulatory criteria for residential land uses but not for commercial or industrial scenarios. A level of arsenic reported at 90.3 milligrams per kilogram (mg/kg) in the 0.5-foot soil sample of soil boring B6 (northern portion of the Site located south of East 40th Place) represents a significant finding of this assessment. This concentration is considered elevated above typical background (even for an urban environment). Other arsenic levels found in the soil samples were within typical background ranges of arsenic for California soil. In general, the levels of metal described herein are not ones that would represent an imminent threat to the environment or persons working on the farm.

1.2 Conclusions and Recommendations

Based on the results of the soil sampling and analysis completed by AEC during the preparation of this assessment, additional assessment for petroleum hydrocarbons, VOCs and metals (excluding arsenic) does not appear to be warranted at this time. If TPL (or the future landowner) desires to take a conservative approach toward the level of arsenic found in soil boring B6 (90.3 mg/kg), soil in the vicinity of this boring can be excavated and disposed of at an offsite landfill or recycling facility. Confirmation soil sampling and analysis will be required to ensure that the soil with the elevated arsenic levels is removed. In addition, no soil should be exported from the Site without evaluation of metals levels with respect to applicable waste characterization criteria. It is our understanding that export of soil from the Site is not planned at this time.

Phase I Environmental Site Assessment

2.0 Introduction

2.1 Purpose

The purpose of this Phase I ESA is to provide a professional opinion on the presence of recognized environmental conditions and other potential environmental conditions in connection with the Site, as they existed on the date of the site inspection, and to recommend whether further investigation is required. The American Society for Testing and Materials (ASTM) Standard Practice E 1527-00, Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process, defines good commercial and customary practice for conducting an environmental site assessment of a parcel of commercial real estate with respect to the range of contaminants pertinent to the scope of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), as well as petroleum products. As such, this ESA is intended to satisfy one of the requirements that permit the user to qualify for the innocent landowner defense to CERCLA liability. In other words, this ESA represents one of the practices that constitute "all appropriate inquiry into the previous ownership and uses of the property consistent with good commercial or customary practice" as defined in 42 USC Section 9601(35)(B).

The goal of the process is to identify recognized environmental conditions, which are defined by the Practice as "the presence or likely presence of any hazardous substances or petroleum products on a property under conditions that indicate an existing release, a past release, or a material threat of release of any hazardous substances or petroleum products into the structures on the property or into the ground, groundwater or surface water of the property". The term *recognized environmental condition* includes hazardous substances or petroleum products even under conditions in compliance with laws. The term is not intended to include de minimis conditions that generally do not present a material risk of harm to public health or the environment and that generally would not be the subject of an enforcement action if brought to the attention of appropriate governmental agencies.

2.2 Scope of Services

This assessment was conducted in accordance with generally accepted Phase I industry standards using ASTM Standard Practice E 1527-00 and AEC Proposal Number 05-027SD. The following services were provided for this assessment:

- An evaluation of information contained within Federal and State environmental databases, and other local environmental records, within specific search distances.
- An evaluation of past Site uses through a review of reasonably obtainable standard historical sources such as historical maps, aerial photographs and interviews with knowledgeable persons.

- A qualitative evaluation of the physical characteristics of the Site through a review of published topographic, geologic, and hydrogeologic maps; published groundwater data; and area observations to characterize surface water flow in the Site area.

- An evaluation of current Site conditions including, but not limited to, a search for the following items including: storage tanks (above or below ground); potential polychlorinated biphenyl (PCB)-containing electrical equipment; hazardous materials and petroleum products generation; treatment, storage, or disposal of hazardous, regulated, or medical wastes.

- The preparation of a Phase I ESA report, which represents the findings from the studies of the items described above and provides conclusions and recommendations based on the information gathered above and provided by the Trust For Public Land.

2.3 Limitations and Exceptions

This Phase I ESA was conducted in accordance with ASTM guidelines for the performance of Phase I Environmental Site Assessments. No other warranties either express or implied, are made by AEC. AEC's evaluations, analyses, and opinions should not be taken as representations regarding subsurface conditions or the actual value of the Site. Subsurface conditions may differ from the conditions implied by the surficial observations, and can only be reliably evaluated through intrusive techniques.

Documentation and data provided by the Trust For Public Land, designated representatives of the Trust For Public Land, or other interested third parties, or from the public domain, and referred to in the preparation of this assessment, are assumed to be complete and correct and have been used and referenced with the understanding that AEC assumes no responsibility or liability for their accuracy. AEC's conclusions are based upon such information and documentation and on our observations of Site conditions, as they existed on the date of the site inspection. Because Site conditions may change significantly over a short period of time and additional data may become available, data reported and conclusions drawn in this report are limited to current conditions and may not be relied upon on a significantly later date.

Reasonable efforts have been made during this assessment to uncover evidence of USTs, aboveground storage tanks (ASTs), and ancillary equipment associated with these tanks. "Reasonable efforts" are limited to information gained from visual observation of unobstructed areas, recorded database information held in public record, and available information gathered from interviews. Such methods may not identify subsurface equipment that may have been hidden from view due to paving, construction or debris pile storage, or incorrect information from sources.

This investigation was not an environmental compliance audit. While some observations and discussion in this report may address conditions and/or operations that may be

regulated, the regulatory compliance of those conditions and/or operations is outside the scope of this investigation.

Nothing in this report constitutes a legal opinion or legal advice. For information regarding specific individual or organizational liability, AEC recommends consultation with independent legal counsel.

2.4 User Reliance

This report was prepared for use solely and exclusively by the Trust For Public Land, the Los Angeles Neighborhood Land Trust and other parties (as identified by the Trust For Public Land). This Phase I ESA may be provided by the Trust For Public Land, in its sole discretion, to third parties in connection with the sale of the land or portions thereof by the Trust For Public Land to said third parties or acquisition of the land by the Trust For Public Land from said third party, and may be relied upon by such third party to the same extent that this report may be relied upon by the Trust For Public Land. No other use or disclosure is intended or authorized by AEC. In the preparation of this ESA, AEC has used the degree of care and skill ordinarily exercised by a reasonably prudent environmental professional in the same community and in the same time frame given the same or similar facts and circumstances. No other warranties are made to any third party, either express or implied.

3.0 Site Description

3.1 Location and Legal Description

The Site is a 9.4-acre portion of the South Central Farms urban farm, bounded to the north by East Martin Luther King Boulevard, to the south by East 41st Street, to the east by South Alameda Street and to the west by Long Beach Avenue. East 40th Place traverses the central portion of the Site in an east-west direction. A vicinity map is included as Appendix A.

Current physical addresses and associated Los Angeles County Assessors Identification Numbers (AINs) include a portion of 1838 East Martin Luther King Boulevard (AIN 5117-019-016), 1720 East 40th Place (AIN 5117-020-029), a portion of 1721 East 40th Place (AIN 5117-019-019), 1883 East 40th Place (AIN 5117-019-020), 1701-1801 East 41st Street (AINs 5117-020-029 through -040), 4051 South Alameda Street (AIN 5117-021-020) and 4073 South Alameda Street (AIN 5117-021-023). In addition, there are two parcels within the Site (AINs 5117-021-021 and -022) that have no physical addresses.

3.2 Current Use of the Site

The Site is a portion of an urban farm utilized by local farmers.

3.3 Description of Improvements

No habitable structures are present on the Site. Chain-linked fencing surrounds the majority of the property boundaries. There are some storage sheds located within several of the garden plots used for storage of various supplies, tools and materials. East 40th Place (paved road) traverses the central portion of the Site in an east/west direction. Access gates to the Site are present at its east and west ends within East 40th Place. Municipal utilities including sewer and water are present beneath this road. Storm drain inlets are present along the edges of East 40th Place adjacent to concrete curbs. There are two sinks (produce washing stations) located along the edge of the road as well. Meandering dirt paths traverse the property in varying directions providing access to the farm plots. A Site Plan is included as Appendix B.

3.4 Current Uses of Adjoining Properties

The area surrounding the Site consists primarily of residential and commercial land uses. The following table identifies the adjacent property uses:

Direction	Adjoining Property Use
North	East Martin Luther King Boulevard, then commercial and office buildings – 1700 and 1800 (odd street addresses) of East Martin Luther King Boulevard

Direction	Adjoining Property Use
South	East 41st Street, then commercial and office buildings - 1700 and 1800 (even street addresses) of East 41st Street
East	South Alameda Street, then commercial buildings – 3700 to 4000 block (even street addresses) of South Alameda Street
West	Long Beach Avenue, then railroad tracks and commercial/residential buildings – 4000 block (odd street addresses) of Long Beach Avenue

4.0 User Provided Information

4.1 Reason for Performing Phase I ESA

The Trust For Public Land retained AEC to conduct this Phase I ESA in connection with the potential purchase of the Site, to identify any environmental issues which may be present. We understand that if acquired, the property will be conveyed to the Los Angeles Neighborhood Land Trust for preservation of its existing urban farm use.

4.2 Specialized Knowledge

AEC was provided with prior environmental studies pertaining to the Site (refer to Section 5.5.1). Aside from information included in the reports, AEC was not informed of any specialized knowledge pertinent to potential environmental conditions at the Site.

4.3 Valuation Reduction for Environmental Issues

AEC was not informed of any environmental issues that have caused or may cause a valuation reduction of the Site.

4.4 Title Records

AEC was not provided with title records for the Site. However, a full legal description was provided by TPL as well as the names of the current property owners. The lack of a review of title records does not alter the conclusions and recommendations of this assessment. According to the information provided, the subject Site is currently owned by Horowitz Trust (42.5% interest), Libaw L.P.(42.5% interest), Ison (10% interest) and Shaghan Securities (5% interest).

4.5 Environmental Liens or Activity and Use Limitations

AEC was not notified of any environmental liens or activity or use limitations that are related to environmental issues that may cause a valuation reduction of the Site.

4.6 Owner, Property Manager, and Occupant Information

Mr. Tezo Zomac, a leasee of one of the farm plots at the property and one of the spokesmen for the project was interviewed by AEC during the preparation of this ESA. Information obtained during the interview is included in pertinent sections of this report.

5.0 Records Review

AEC reviewed Federal and State environmental databases provided by EDR, for information pertaining to documented and/or suspected releases of regulated hazardous substances and/or petroleum products within specified search distances.

AEC also reviewed the unmappable sites listed in the environmental database report by cross-referencing addresses and site names. Unmappable ("non geocoded") sites are sites that cannot be plotted with confidence, but can be located by zip code or city name. In general, a site cannot be mapped because of inaccurate or missing location information in the record provided by the regulatory agency. Any unmappable sites that AEC identified within the specified search radii are included and discussed in the corresponding database sections. A copy of the EDR report is included as Appendix C.

5.1 Federal Database Reviews

National Priorities List (NPL)

The National Priorities List (Superfund) is the United States Environmental Protection Agency (EPA) database of uncontrolled or abandoned hazardous waste sites identified for priority remedial actions under the Superfund Program.

- Neither the Site nor properties mapped within a 1-mile radius of the Site are listed on the Federal NPL.

Comprehensive Environmental Response, Compensation and Liability Information System (CERCLIS)

The CERCLIS List is a compilation of known and suspected uncontrolled or abandoned hazardous waste sites which are, or were, under investigation by the EPA but have not been elevated to the status of a Superfund (NPL) site.

- The Site is not listed on the CERCLIS database.

- One property mapped within a one-half mile radius of the Site is listed on the CERCLIS database. The property is identified as AAD Disposal and reportedly located approximately 2,000 feet to the east of the Site at 2306 38th Street in Vernon, California. Based on the information pertaining to this property in the database and distance of this property from the Site, the AAD Disposal facility is not considered a concern to the subject Site.

CERCLIS No Further Remedial Action Planned (NFRAP)

The CERCLIS-NFRAP List is a database of archived CERCLIS sites that to the best of EPA's knowledge, assessment has been completed and has determined no further steps will be taken to list them on the NPL.

- The Site is not listed on the CERCLIS-NFRAP database.

- One property mapped within a one-half mile radius of the Site is listed on the CERCLIS-NFRAP database. The property is identified as Renu Plating Corp and reportedly located approximately 1,800 feet to the northwest of the Site at 1531 East 32nd Street in Vernon, California. Based on the regulatory status of this facility and distance of this property from the Site, the Renu Plating Corp facility is not considered a concern to the subject Site.

RCRA Treatment, Storage, and Disposal (TSD) Facilities

The Resource Conservation and Recovery Act (RCRA)-TSD database is a compilation by the USEPA of reporting facilities that transport, treat, store, or dispose of hazardous waste.

- Neither the Site nor any properties within one-half mile of the Site were listed on the RCRA TSD database.

RCRA CORRACTS

The RCRA CORRACTS database identifies TSD facilities that have conducted, or are currently conducting, corrective actions as regulated under RCRA.

- Neither the Site nor any properties within one-half mile of the Site were listed on the RCRA-CORRACTS database.

RCRA Generators

The RCRA Generator database tracks large quantity generators (LQG) and small quantity generators (SQG) of hazardous waste.

- One of the current physical addresses of the Site is listed on the RCRA Generator database as a SQG. The address listed is 4073 South Alameda Street and the referenced business is Utility Trailers. No violations are reported for this facility.

- A former address of the Site is also listed as a SQG. The address listed is 1838 East Santa Barbara Avenue (now Martin Luther King Boulevard) and the referenced business is Singer Co. LA Period Furniture Division. No violations are reported for this facility.

- Walter Miller Express Cleaner (referenced as a drycleaning facility), is mapped at 1835 East 41st Street (southeast portion of the subject Site) and is listed on the database as a SQG. Although this address is not one of the current Site addresses, it does fall within the range of potential former addresses of the subject property. No violations are reported for this facility. If this portion of the Site was historically used as a drycleaner, adverse environmental conditions could be present in the subsurface in this area.

- Eleven small quantity RCRA Generators (some adjacent across bordering roadways) were identified within one-quarter mile of the Site. The properties are listed with no reported violations or enforcement actions. Based on the lack of reported violations and location of the SWG properties, it is not anticipated that the Site has been adversely impacted by these properties.

Emergency Response Notification System (ERNS) Database

The ERNS is a national database used to collect information on reported releases of oil or hazardous substances. The ERNS database is now part of the National Response Center (NRC) database.

- The Site is not listed on the ERNS database.

5.2 State Database Reviews

Cal-Sites

The State Sites database is a compilation of information and sub-databases maintained by the California EPA, Department of Toxic Substances Control (DTSC). Such information includes lists of properties that are known to be contaminated with hazardous substances as well as information regarding properties that are uncharacterized where further studies may reveal problems.

- The Site was not listed on the Cal-Sites database.

- There are three properties mapped within a 1-mile radius of the Site that are listed on the Cal-Sites database. The properties include Renu Plating at 1531 East 32nd Street and AAD Disposal at 2306 38th Street (both referenced previously) which as stated previously are not considered a concern to the subject Site. Amtrak, reportedly located 4,500 feet northeast of the Site at 2435 East Washington Boulevard, is listed on the Cal-Sites database as an active case listing. Based on the information pertaining to this property in the database and distance of this property from the Site, the Amtrack facility is not considered a concern to the subject Site.

State Landfills

SWL facilities within the State of California are regulated by the California Integrated Waste Management Board (CIWMB). The lists provided by the CIWMB and searched include Solid Waste Transfer Stations, Inactive Solid Waste Facilities, and the Solid Waste Facilities Database.

- The Site is not listed on the State Landfills database.

- One property mapped within a one-quarter mile radius of the Site is listed on the State Landfills database. The property is identified as Azteca Rubbish and reportedly located approximately 1,150 feet to the south of the Site at 1742 East 43rd Street. Wastes reportedly accepted at this facility include construction/demolition debris and other inert materials. Based on the regulatory status of this facility and distance of this property from the Site, the Azteca Rubbish facility is not considered a concern to the subject Site.

Underground Storage Tank Database (UST)

EDR searches several UST databases that are a combination of information sources maintained by the Cal EPA and Federal EPA, with the primary sources being from State and local agencies. Properties on the list house either ASTs or USTs.

- One of the current physical addresses of the Site is listed on the UST databases. The address listed is 1801 East 41st Street and the referenced business is Utility Trailer Co Corp. According to the database, there are no tanks currently present at this address. Refer to Section 5.3.2 of this report for additional information pertaining to USTs at this property.

- A former physical address of the Site (1786 East Martin Luther King Boulevard) is also listed on the UST databases. No details are provided in the database report. Refer to Section 5.3.2 of this report for additional information pertaining to USTs associated with this address.

- There are 20 properties mapped within a ¼-mile radius of the Site that are listed on one or more of the UST databases. Only one of these properties is listed on the leaking underground storage tank (LUST) database. The listed property is located approximately 750 feet east-northeast of the subject Site. Based on the information provided in the database report, none of the properties listed on the UST databases are expected to adversely impact the subject Site.

Leaking Underground Storage Tanks (LUST)

The LUST database is maintained by the California Regional Water Quality Control Board (RWQCB) and lists properties with known releases from USTs.

- The Site is not listed on the LUST database.
- As stated previously, one property mapped within a ¼-mile radius of the Site is listed on the LUST database. The property is identified as Crescent Truck Lines and reportedly located approximately 750 feet east-northeast of the Site at 2910 Ross Street, Vernon, California. The case type is listed as "soil only" with a closed regulatory status. This property is not considered a concern to the subject Site.
- There are three properties mapped between ¼ to ½-mile from the Site that are listed on the LUST database. Cases for these properties are listed as "soil only" with closed regulatory status. These properties are not considered a concern to the subject Site.

Additional Non-ASTM State Databases

Additional properties in the site vicinity are listed on other non-ASTM State databases as specified in the EDR report. None of these additional properties are expect to adversely impact the Site.

5.3 Local Regulatory Agency Research

The following local regulatory agency review was conducted/reviewed to obtain any environmentally significant information concerning the Site that was readily available.

5.3.1 County/Local Health Department

The County of Los Angeles Site Mitigation List and HMS (industrial waste and UST sites) databases were searched in the regulatory database report provided by EDR. The Site is not listed in either of these databases.

5.3.2 City of Los Angeles Fire Department

A public records request was submitted to the City of Los Angeles Fire Department (LAFD) UST Division for information pertaining to USTs on the Site. Current and/or historical addresses of the Site searched by LAFD included 4050 Long Beach Avenue (former gas station), 1720, 1721, 1733 and East 40th Place, 1707, 1769, 1801 and 1835 East 41st Street, 4051 and 4073 South Alameda Street and 1786 and 1838 East Martin Luther King Boulevard (formerly East Santa Barbara Avenue). Records were found for 1801 East 41st Street and 1786 East Martin Luther King Boulevard. No records were found for the remaining addresses searched.

A LAFD permit dated August 28, 1973 was issued to Utility Trailer Sales Co. (addressed referenced as 1801 East 41st Street) for the installation of two atmospheric tanks built as per plans and specifications. However, the application for the permit which includes written information and a drawing of the property and tank locations indicates that the actual location of the installed tanks and dispensers was at 1801 East 41st Place, located one block south of the subject Site. Based on this information, it is likely that there was a typographical error pertaining to the street address of the permitted location on the LAFD permit and that the USTs were not installed on the subject Site.

Information included in the file for 1786 East Martin Luther King Boulevard indicated that a 6,000-gallon UST used for diesel fuel storage was removed from the sidewalk area adjacent to the subject Site and west of the intersection of East Martin Luther King Boulevard and South Alameda Street. The tank was removed from this area (for subsequent recycling) on March 7, 1996 by Petro Builders, Inc. under regulatory oversight by Hart Crowser and the LAFD. Stockpiles of soil generated during the excavation were placed in the northern portion of the subject Site. Two confirmation soil samples were obtained from the excavation bottom and two samples were obtained from the stockpile areas and analyzed at an off-site analytical laboratory for total petroleum hydrocarbons (TPH) in the diesel range and benzene, toluene, ethylbenzene and total xylenes (BTEX). Such analytes were not detected at or above laboratory detection limits in the four soil samples. The LAFD recommended no further action with respect to the UST and the excavation was backfilled. It is likely, but not verified that the spoil piles generated during the tank excavation were used as fill material for the backfilling process.

LAFD file Information pertaining to these properties is included in Appendix D.

5.4 Physical Setting Sources

The following physical setting sources were reviewed to provide information about the topographic, hydrologic, geologic and/or hydrogeologic characteristics of the Site.

5.4.1 Topography and Hydrology

USGS Topographic Quadrangle

Based on a review of the United States Geological Survey (USGS) 7.5 Minute Series, Los Angeles, CA Topographic Quadrangle map dated 1994, the elevation of the Site is approximately 210 feet above mean sea level (msl). The site is located in Section 28, Township 1 North, Range 8 West. Slope and surface drainage patterns in the direct vicinity of the Site are to the southeast and southwest.

Hydrology/Storm Water Management

Surface drainage at the Site is facilitated by a municipal storm drain that traverses the Site in an east-west direction within 40th Place. Storm drain inlets are present along the curb areas of this street.

5.4.2 Geology

The Site lies within the Peninsular Ranges Geologic Province of California. This geomorphic province is traversed by a group of northwest trending sub-parallel fault zones and encompasses an area that extends 125 miles from the Transverse Ranges and the Los Angeles Basin south to the Mexican Border and beyond another 775 miles to the tip of Baja California. Rocks within the Peninsular Range Province were emplaced during Cretaceous age orogenic events and uplifted into the present mountain ranges during the late Tertiary and Quaternary. Igneous, metamorphic and sedimentary rocks are all found within the Peninsular Ranges. The area is seismically active, with several known active faults crossing the Province.

Based on geologic map sources, the Site appears to be underlain by Holocene-age alluvial fan deposits consisting of loose to medium dense sand, silt and gravel. No faults are mapped on the Site and the property is not located within an Alquist-Priolo Fault Zone.

5.4.3 Hydrogeology

According to the Water Quality Control Plan for the Los Angeles Basin (1994), groundwater within the Los Angeles Coastal Plain (in which the Site is located) has existing beneficial uses for municipal, agricultural and industrial service/process. Based on regional groundwater information for the area, historical high levels of groundwater beneath the Site are estimated at 75 to 80 feet below the ground surface with anticipated regional flow direction to the southeast and/or southwest. Groundwater depth beneath the site likely varies due to local faulting, seasonal rainfall and other factors.

5.5 Historical Use Information

AEC reviewed the following historical sources to develop a history of the previous uses of the Site and surrounding area, in order to help identify the likelihood of past uses having led to recognized environmental conditions in connection with the Site.

5.5.1 Previous Environmental Reports

Prior environmental investigations have been completed at the South Central Farms property. AEC recently completed a review of excerpts of the following documents that were provided by the client:

- Preliminary Site Assessment, Lancer Site, Los Angeles, California, dated April 1993 and prepared by Montgomery Watson on behalf of the Los Angeles City Harbor Department.

- Preliminary Health Risk Evaluation, Lancer Site, dated January 18, 1995 and prepared by Hart Crowser, Inc. on behalf of the Port of Los Angeles (analytical data tables and soil boring location map only).

- Draft Site Investigation Report, Lancer Site, dated October 29, 2003 and prepared by Pacific Edge Engineering, Inc. on behalf of the Port of Los Angeles

It is AEC's understanding that other reports have been prepared on behalf of the Port of Los Angeles or the City of Los Angeles and include but are not limited to the following:

- An Environmental Impact Report (EIR) dated February 1984 and prepared by Cooper Engineers, Inc.
- Lancer Site demolition reports, dated May 25, November 14 and November 15, 1990 and prepared by the City of Los Angeles Geotechnical Services Section
- A Health Risk Assessment of the L.A. City Energy Recovery (Lancer) Project, dated April 17, 1987, author not specified
- Asbestos Air Monitoring Report, dated January 4, 1990 and prepared by CTC Environmental Services
- An asbestos survey report dated May 21, 1990 and prepared by CTC Environmental Services
- Preliminary Health Risk Evaluation of Gardening Uses, Lancer Site, dated September 16, 1994 and prepared by Hart Crowser, Inc.
- Underground Storage Tank Closure Report, Port of Los Angeles, Lancer Site, 1786 East Martin Luther King Boulevard, dated June 1996 and prepared by Hart Crowser, Inc.

Such documents were *not* provided or reviewed by AEC during this assessment. However, a summary of some of these reports was included in the April 1993 Montgomery Watson report.

According to the Montgomery Watson report summary, surficial discoloration of soil was noted in some areas of the Site during demolition of the former structures once present on the property. Elevated levels of TPH and polynuclear aromatic hydrocarbons (PAHs) were found in select surficial soil samples. Four soil borings were drilled in locations identified as Areas 1 and 2 and indicated petroleum hydrocarbon contamination in the upper 1 foot of the soil column with minor levels of VOCs and SVOCs noted. Two concrete clarifiers (identified as Areas 3 and 4) and a concrete-lined pit were also identified at the Site. Areas 1, 2 and 4 were reportedly located on the southern half of the farm (south of East 40th Place) while Area 3 was located near the southern boundary of the northern half of the farm.

Approximately 225 cubic yards of soil was reported excavated, manifested and removed from the Site by a licensed hauler. Confirmation soil samples were obtained from the bottoms of the excavations and tested for petroleum hydrocarbons and SVOCs. The results did not indicate analytes above laboratory detection limits. The referenced

clarifiers and concrete-lined pit were also removed from the Site. Soil testing in Area 3 (clarifier 1) was conducted and did not exhibit contaminant levels of concern. Analytes included TPH, BTEX and metals. Elevated levels of lead and BTEX were found in Area 4 (clarifier 2). Additional soil remediation was apparently conducted in these areas as indicated by a report of compaction test results of fill material used to replace excavated and remediated soils. Additional details pertaining to the nature and extent of the remediation was not included in the report. Based on Montgomery Watson's review of the prior documents, they concluded the following:

- The horizontal extent of contamination subsequent to remediation did not appear to have been well defined
- Only four relatively small areas were remediated over the entire 13.3-acre property
- The basis for identification of contaminated areas was primarily visual observation of discolored soils
- Precise areas of sampling and soil boring were unclear
- The majority of the property had not been investigated with regards to locations of previous tenants/structures.

Montgomery Watson conducted a subsequent preliminary site assessment (similar scope to a Phase I ESA). The assessment included a site reconnaissance, historical aerial photograph and fire insurance map review and government records/database review. It was concluded in the report that several areas on the property with soil contamination were identified by the City of Los Angeles Geotechnical Services and remediated by the City. It was stated that the extent of remediation appears adequate but the level and quality of reliable documentation is low. A risk management matrix was included in the report identifying other potential areas of concern on the property due to historical land uses (primarily identified during fire insurance map review). Additional soil sampling and analysis was recommended throughout the property. In addition, two potential UST areas were identified and included the former Utility Trailer Sales Company property (referenced as 1828 East 41st Street) and along Martin Luther King Boulevard (curb area) along the northern property boundary (1786 East Martin Luther King Boulevard). Evaluation for the potential presence of tanks at these locations was also recommended. It should be noted that 1828 East 41st Street is located on the opposite side of 41st Street (not on the subject Site). This is considered a potential error by Montgomery Watson in the completion of their assessment.

The September 16, 1994 Hart Crowser Preliminary Health Risk Evaluation report (as discussed in the Montgomery Watson report) indicated the chemicals detected in soils at the property included metals and SVOCs with lead being the primary concern for potential health impacts. It was also stated that lead levels over most of the property are acceptable for gardening with a limited number of samples exceeding acceptable limits. Additional sampling for contaminants of concern was recommended.

Based on our review of limited information from the 1995 Preliminary Health Risk Evaluation completed by Hart Crowser, Inc., a total of 44 sampling points (soil boring locations) were identified in this study. Some of the sampling locations were located in potential areas of concern including the former die casting area, a former truck repair area

and a former painting area and varnish room. Other samples were aligned in a grid pattern throughout the property. Soil samples were obtained from depths ranging from 0.5 foot to 5 feet below the ground surface and were tested for analytes such as total metals, SVOCs, TPH, total recoverable petroleum hydrocarbons (TRPH) and VOCs. SVOCs, TPH and VOCs were not detected at or above laboratory detection limits analyzed for such constituents. Levels of TRPH detected ranged from 18 milligrams per kilogram (mg/kg) to 195 mg/kg. Lead levels ranged from less than the laboratory detection limit up to a maximum of 523 mg/kg. A geophysical survey was completed at the former Utility Trailer Sales Company property and no indicators of USTs were reported.

During the completion of the October 29, 2003 Draft Site Investigation Report prepared by Pacific Edge Engineering, a total of 24 direct-push soil borings and 32 hand auger borings were drilled at the South Central Farms property. Diagrams of the boring locations were not provided in AEC's copy of excerpts of this report. Soil samples were collected at depths ranging from 0.5 foot to 15 feet below the ground surface. Select soil samples were analyzed for TPH, SVOCs, VOCs, total metals, hexavalent chromium, organochlorine pesticides, PCBs and chlorinated herbicides. Levels of TPH (diesel and heavy oil ranges) were found in surficial soil at levels as high as 550 mg/kg and were not deemed a significant risk. Low level SVOCs, VOCs and PCBs were found in some of the soil samples and compared to United States EPA Preliminary Remediation Goals (PRGs) for commercial/industrial properties. None of the levels of the referenced analytes detected exceeded their respective PRGs.

Levels of metals (excluding arsenic) also did not exceed the PRGs for commercial/industrial soil. However, it was noted that some soil at the property would be considered a hazardous waste (based on a comparison to waste characterization thresholds) if removed from the property. Lead levels as high as 726 mg/kg were found on the property with the majority of the samples exhibiting lead levels less than 100 mg/kg. Arsenic levels which exceed its highly conservative (and generally unattainable PRG) were referenced as being indicative of urban background contributions. Hexavalent chromium was not detected at or above laboratory detection limits. Low levels of the organochlorine pesticides 4,4-DDD, 4,4-DDE, 4,4-DDT and chlordane were detected in four of the soil samples and were below applicable PRGs. Chlorinated herbicides were not detected at or above laboratory detection limits in the soil samples analyzed for such constituents. Portions of the South Central Farms property within the subject Site boundaries that were referenced as remaining unassessed included the metal cast and pattern shop/foundry in the southwestern corner of the Site and the gasoline station at 4050 Long Beach Avenue (former address).

In addition to the documents referenced above, AEC was provided with analytical soil data pertaining to the South Central Farms property by the Los Angeles Regional Food Bank. The laboratory data report is dated February 2, 1995 and was generated by the soil and plant tissue testing lab at the University of Massachusetts in Amherst, MA. A total of 20 soil samples (locations and depths not specified) were submitted for analysis. Select soil samples were tested for extractable lead, reported in parts per million (ppm),

with levels ranging from 6 ppm to 19 ppm. Estimated total lead levels ranged from 150 ppm to 346 ppm. In each sample report, it is stated that "the lead level in this soil is low."

5.5.2 Fire Insurance Maps

AEC reviewed fire insurance maps from the years 1920, 1949, 1953, 1954, 1958, 1960, 1963, 1968 and 1970 provided by EDR. Please note that the Site and only adjacent properties to the north (areas south of Martin Luther King Boulevard), south and west are shown on the maps. The results of the map reviews are summarized in the following table:

Fire Insurance Map Review	
Year	**Observations**
1920	**SITE:** The majority of the Site consists of vacant lots and dwellings with associated sheds/garages. A wood planning mill is depicted along the western property line. A building labeled "sign painting" and a carpet shop are present along the southern property boundary. A Los Angeles Furniture factory and associated lumber yard and a facility occupied by the City Refrigeration & Fixture Company are depicted along the eastern property boundary. East 37th Street (now East 40th Place) traverses the Site in an east-west direction. **SURROUNDING AREA:** East Jefferson Avenue (now East Martin Luther King Avenue), East 38th Street (now East 41st Street), South Alameda Street and Long Beach Avenue are shown. The adjacent properties depicted consist primarily of dwellings and vacant lots. A fork factory is depicted to the west across Long Beach Avenue.

Fire Insurance Map Review	
Year	**Observations**
1949	**SITE:** The majority of the northern portion of the Site is occupied by the Los Angeles Period Furniture Company. Other portions of the northern area consist of dwellings. A City Refrigerator Wood Works facility and Utility Trailer manufacturing and repair facility are depicted in the southeastern portion of the Site. A gasoline station is depicted at 4050 Long Beach Boulevard (southeast corner of Long Beach Avenue and 40th Place). A wood working/pattern shop is depicted in the southwest corner of the Site and a building labeled "die casting" is shown along the southern property boundary. **SURROUNDING AREA:** East Jefferson Avenue (now East Martin Luther King Avenue) is labeled as East Santa Barbara Avenue. East 38th Street is now labeled East 41st Street. The adjacent properties appear generally similar to the 1920 maps with less vacant lots evident. Portions of the Los Angeles Period Furniture Company also occupy the northern adjacent property. A carpet cleaning and metal stamping facility are also depicted on the northern adjacent properties. The southeastern adjacent property is labeled "gas and oil in yard". A few stores and a truck yard are depicted on the southern adjacent properties across East 41st Street.
1953, 1954	**SITE:** The Site appears generally similar to the 1949 maps. **SURROUNDING AREA:** Adjacent properties appear similar to the 1949 maps.
1958	**SITE:** The Site appears generally similar to the 1953 and 1954 maps. A foundry is now shown in the southwestern corner of the Site. A sheet metal shop is now shown along the southern property boundary. **SURROUNDING AREA:** Additional portions of the northern adjacent property are occupied by the Los Angeles Period Furniture Company. The majority of the southern adjacent property is used as a truck yard. A metal polishing and wood products facility are visible to the west across Long Beach Avenue.
1960	**SITE:** The Site appears generally similar to the 1958 maps. The die casting and sheet metal shop in the southern portion of the Site are no longer visible (shown as vacant buildings). **SURROUNDING AREA:** Adjacent properties shown on the maps appear similar to the 1958 maps.

Fire Insurance Map Review	
Year	**Observations**
1963	**SITE:** The Site appears generally similar to the 1960 maps. The die casting and sheet metal shop in the southern portion of the Site are now labeled "plastic scrap warehouse" and "furniture manufacturing." The gasoline station at 4050 Long Beach Avenue remains present. **SURROUNDING AREA:** Adjacent properties shown on the maps appear similar to the 1960 maps. A building labeled "electroplating" is shown to the west.
1968	**SITE:** The gasoline station at 4050 Long Beach Avenue is no longer depicted on the map and is now occupied by a portion of the Los Angeles Period Furniture Company. The foundry in the southwestern corner of the Site is now labeled "furniture manufacturing." The plastic scrap warehouse in the southern portion of the Site is now labeled "plastic casting." Other portions of the Site consist of stores, dwellings, and a parking lot. **SURROUNDING AREA:** Adjacent properties shown on the maps appear similar to the 1963 maps.
1970	**SITE:** The Site appears generally similar to the 1968 maps. The wood working/pattern shop and foundry are no longer shown in the southwestern portion of the Site. **SURROUNDING AREA:** Adjacent properties shown on the maps appear similar to the 1968 maps.

Reproductions of the maps are included in Appendix E.

5.5.3 Historic City Directories

AEC reviewed historical city directory listings from several years ranging from 1920 to 2004 provided by EDR. The majority of the Site addresses (historical and current) appear as personal names (indicating residences or small businesses). Several business names of varying natures also appear in the historical directories. The majority of the names are not ones that are indicative of potential sources of contamination at the subject property. A few of the referenced business names raise a potential concern as follows:

- Gasoline service Station at 4050 Long Beach Boulevard (referenced as Joe's Service Station in some directories) - referenced in the 1949, 1953, 1954, 1958, 1960, 1963 and 1968 directories.

- Eastside Pattern and Foundry Company at 1707 East 41st Street - referenced in the 1958, 1960, 1963 and 1968 directories.

- Whiteson Color and Chemical Company at 1733 East 40th Street (shown as a store on historical fire insurance maps) – referenced in the 1967 directory.

Adjacent and nearby properties were reported as used primarily for residential and commercial purposes with some industrial operations noted. Reproductions of the city directories are included in Appendix F.

5.5.4 State of California Division of Oil and Gas Records

According to online resources provided by the California Department of Conservation, Division of Oil, Gas and Geothermal Resources, there are no oil, gas or geothermal wells located on the Site or adjacent properties.

5.5.5 Interview Information

As stated previously, Mr. Tezo Zomac was interviewed by AEC during the preparation of this ESA. Information from this interview is referenced in pertinent sections of this report.

6.0 Site Reconnaissance

The objective of the site reconnaissance was to obtain information indicating the likelihood of any recognized environmental conditions in connection with the Site. This reconnaissance was conducted on Saturday, April 22, 2006 by Mr. Dan Weis, Branch Manager of AEC's San Diego County office. Mr. Weis was escorted by Mr. Tezo Zomac during the site visit.

6.1 Methodology and Limiting Conditions

The site reconnaissance consisted of walking portions of the Site and the public access roads in the surrounding areas of the Site. As stated previously, a Site Map is included as Appendix B of this report. Photographs of the Site were taken to document existing Site conditions and are included and described in Appendix G.

6.2 Chemical Storage

Retail-sized containers (less than 5-gallons) of cleaning, maintenance and pest control products were observed in many of the farm plot areas. Staining of soil was not observed adjacent to such containers. A concrete pad surrounded by chain-linked fencing was observed in the eastern portion of the Site on the north side of East 40th Place. Farming equipment, generators and less than 5-gallon containers of gasoline and oil products were observed in this area. Staining was not observed adjacent to the containers. Aside from the products referenced above, Mr. Zomac was unaware of the storage of chemical products on the Site.

6.3 Waste Generation, Storage and Disposal

Organic waste generated from farming activity at the Site is disposed of in roll-off bins and disposed of weekly by Waste Management. A few small containers of used oil were observed in the storage area referenced in the previous section and are not considered a significant concern. No other evidence of waste generation, storage or disposal was noted by AEC in accessible portions of the Site. Mr. Zomac was unaware of additional waste generation or storage activities at the Site.

6.4 Storage Tanks

No evidence of USTs or ASTs was observed by AEC in accessible portions of the Site. Mr. Rehfeld and Mr. Pirrone were unaware of the presence of tanks on the Site.

6.5 Polychlorinated Biphenyls (PCBs)

Accessible portions of the Site were investigated for the presence of equipment that could contain PCBs. PCBs are toxic coolants or lubricating oils that can be found in oil-filled

equipment such as electrical transformers, capacitors, hydraulic elevators and hydraulic service bay lifts. No hydraulic or suspect PCB-containing equipment was observed. Mr. Zomac were unaware of the presence of such equipment on the Site.

6.6 Other Conditions of Potential Concern

AEC also examined accessible portions of the Site for evidence of the following potential environmental conditions:

Conditions	Not Observed	Observed	Potential Concern?
Chemical/Petroleum Odors	X		No
Pools of Liquid	X		No
Floor Drains/Sumps/Wells	X		No
Stains or Corrosion	X		No
Unidentified Containers	X		No
Stained Soil or Pavement	X		No
Stressed Vegetation	X		No

7.0 Findings, Conclusions and Recommendations of the Phase I ESA

Advantage Environmental Consultants, LLC has performed a Phase I Environmental Site Assessment, in conformance with the scope and limitations of ASTM Practice E 1527-00 at the South Central Farms property in Los Angeles, California.

The documented impacts of subsurface soil on the property resulting from decades of light-industrial use are considered a recognized environmental condition associated with the Site. Based on the information obtained during the preparation of the Phase I ESA portion of this study, which included a review of the prior environmental studies provided to AEC, near-surface soil throughout areas of the project site is impacted with petroleum hydrocarbons (diesel fuel and oil) and heavy metals (particularly lead). However, the levels are not ones that would represent an imminent threat to the environment or persons working on the farm. Other contaminants found during prior studies included organochlorine pesticides and various VOCs and SVOCs. The levels of these compounds reported in the documents reviewed by AEC are considered to be low and were below applicable regulatory action levels.

Other potential areas of concern identified at the site were not addressed in documents reviewed to date by AEC. These areas include:

- Former gasoline station at the southeast corner of East Long Beach Avenue and 40th Place – Parcel 5117-020-029.
- Former metal cast and pattern shop/foundry – northeast corner of East Long Beach Avenue and 41st Street – Parcel 5117-020-029 and -030.
- Potential former drycleaning facility on the southeastern portion of the farm - western portion of 4073 South Alameda Street (Parcel 5117-021-023)

It is our recommendation that these areas be assessed for potentially adverse subsurface soil conditions. Potential contaminants of concern include petroleum hydrocarbons, VOCs and heavy metals. Further assessment of soil conditions for SVOCs or organochlorine pesticide content at the site does not appear to be warranted at this time.

Phase II Environmental Site Assessment

8.0 Field Activities and Methodology

8.1 Pre-Field Activities

Prior to the commencement of field sampling, AEC prepared a health and safety plan that outlined the procedures that AEC's personnel followed to minimize the potential for health and safety hazards during the course of work performed at the property. AEC also notified Underground Service Alert (USA) utility marking service prior to drilling activities (Ticket #A1221493). USA member agencies identified known utility locations in the public right of way areas at the Site (within East 40th Place) and in areas adjacent to the Site.

8.2 Soil Sampling

Twelve soil borings (see Appendix B – Site Plan) were drilled at the Site on March 3, 2006 using limited access direct push sampling equipment. The soil borings were drilled by Hydrogeospectrum of Los Angeles, California under the oversight of AEC. The sampling probes were advanced by hydraulically driving a two-inch diameter rod equipped with a soil sampling tool. Total depths of the soil borings ranged from three to twenty feet below existing grades.

Borings B1 and B2 were drilled to 20 feet below the ground surface at the former gasoline station area at the southeast corner of Long Beach Boulevard and East 40th Place. The remaining 10 soil borings (B3 through B12) were drilled to three feet below existing grades at random locations throughout the Site in a grid pattern and served as a confirmatory assessment of near surface soils (compared to prior studies) and a screening level assessment of current soil conditions throughout the property. Four of the ten borings were drilled in areas to the north of East 40th Place and the remaining six borings were drilled in the southern portion of the site (south of East 40th Place). Two of the borings drilled in the southern portion of the Site also targeted the potential areas of concern at 1707 East 41st Street – former foundry (B3) and 1835 East 41st Street – potential former drycleaner (B7).

Relatively undisturbed soil samples were collected into acetate sleeves at the desired sampling depth by unlocking the drive tip and pushing through the soil. The acetate sleeve containing soil was retrieved, cut, capped, sealed with Parafilm™ and the respective soil samples were labeled. The soil samples were chilled and transported to State-certified analytical laboratories using chain-of-custody protocol. Soil samples were collected at depths of 0.5 foot and 1.5, 3, 5, 10, 15 and 20 feet below grade in soil borings B1 and B2. Soil samples were collected at depths of 0.5 foot, 1.5 feet and 3 feet below grade in borings B3 through B12.

Upon completion of drilling and sampling, the soil borings were backfilled with bentonite chips and capped with concrete or asphalt. Soil sampling equipment was

decontaminated between uses by washing with a non-phosphate detergent solution followed by a distilled water rinse.

8.3 Laboratory Analysis

Initially, the analytical laboratories were instructed to composite every four 0.5-foot samples for TPH, metals and VOC analysis (total of three composite soil samples). In addition, select soil samples from greater depths at the former gasoline station were analyzed for petroleum hydrocarbons and VOCs. The choice of soil samples to be analyzed was conducted by visual observations and in-field photoionization detector (PID) analysis. Remaining portions of the 0.5-foot deep samples and the additional soil samples obtained from the site were held at the analytical laboratories pending initial analysis.

TPH and VOC analyses were completed by Baseline On-Site Analysis of Huntington Beach, California using United States Environmental Protection Agency (EPA) test Methods 8015 modified and 8260B, respectively. Metals analysis was completed by Associated Laboratories of Orange, California using EPA test Methods 6010B and 7471A.

9.0 Results and Discussion

9.1 Subsurface Conditions

Soils underlying the Site to a maximum depth of 20 feet consist primarily of clay/sand mixtures, sand/silt mixtures and medium to coarse sand lenses. Petroleum hydrocarbon staining or odors were neither observed, nor detected in soil samples obtained during this assessment. In-field PID screening was conducted on select soil samples and did not exhibit registerable levels of VOCs on the instrument. Groundwater was not encountered in any of the soil borings.

9.2 Analytical Laboratory Data

As shown in Table 1 (Appendix H), soil samples analyzed for TPH and VOCs did not exhibit levels exceeding laboratory detection limits. A number of metals were detected in the soil samples collected as part of this investigation. The composite soil sample metal concentrations (excluding total chromium) consisting of soil collected from 0.5-foot below the surface (Table 2) were compared to ¼ of the published California Human Health Screening Levels (CHHSLs) for both residential and commercial/industrial land uses. There are currently no published CHHSLs for total chromium. In lieu of this, ¼ of the United State EPA PRGs for residential and industrial soil were used for comparative criteria. CHHSLs and PRGs are risk-based, conservative thresholds calculated based on a target excess lifetime cancer risk of 1 in one million ($1x10^{-6}$).

Levels of metals found in the composite soil samples exceeding one or more of the above referenced action levels are discussed below. Other metals were not found at levels above their respective action levels in the composite samples. A copy of the analytical laboratory reports (including quality control data) and chain of custody documentation are included in Appendix I.

Arsenic

Arsenic levels in composite soil samples ranged from 3.28 to 36.6 mg/kg. The highest level of arsenic (36.6 mg/kg) was found in sample Composite B5, B6, B7, B8-0.5'.

Commonly reported background concentrations of arsenic in California soils are above the CHHSLs for both residential and industrial settings. Background concentrations of arsenic found in California soils as reported by Bradford et al. (March 1996) ranged from 0.6 to 11.0 mg/kg with an arithmetic mean of 3.54 mg/kg. The CHHSLs for residential and commercial/industrial settings for arsenic are 0.07 and 0.24 mg/kg, respectively, with one-quarter of the CHHSLs being significantly lower. Regulatory agencies do not typically require cleanup for arsenic below natural background levels and often consider the use of local or regional background concentrations as clean-up levels.

To further evaluate the distribution of arsenic in the soil borings obtained from the Site during the preparation of this study, the 12 discrete soil samples that comprised the three composite soil samples were analyzed for total arsenic. Arsenic concentrations in eleven of the twelve 0.5-foot soil samples (B1 through B5 and B7 through B12) were within the typical background range for arsenic in California soils and with reported levels varying from 1.94 to 8.09 mg/kg. Arsenic was found at 90.3 mg/kg in the 0.5-foot soil sample of boring B6. This concentration is considered elevated above typical background (even for an urban environment).

Cadmium

Levels of cadmium in the three composite soil samples ranged from 0.77 to 1.10 mg/kg. These levels exceed ¼ of the residential CHHSL (0.425 mg/kg) but did not exceed ¼ of the commercial/industrial CHHSL (1.875 mg/kg). To further evaluate the levels of cadmium in the surficial soil samples obtained from the Site, the 12 discrete soil samples that comprised the three composite soil samples were analyzed for this constituent. Cadmium levels reported in the 12 discrete 0.5-foot soil samples ranged from 0.55 to 1.90 mg/kg. The highest level of cadmium reported (1.90 mg/kg) was found in soil boring B6, which slightly exceeds the residential CHHSL (1.7 mg/kg) but not the commercial/industrial CHHSL (7.5 mg/kg). Cadmium levels reported for the 0.5-foot samples from the remaining soil borings did not exceed its residential or commercial/industrial CHHSL.

Lead

Levels of lead in the three composite soil samples ranged from 72.8 to 147 mg/kg. These levels exceed ¼ of the residential CHHSL (37.5 mg/kg) but did not exceed ¼ of the commercial/industrial CHHSL (875 mg/kg). To further evaluate the levels of lead in the surficial soil samples obtained from the Site, the 12 discrete soil samples that comprised the three composite soil samples were analyzed for this constituent. Lead levels reported in the 12 discrete 0.5-foot soil samples ranged from 17.5 to 354 mg/kg. None of the lead levels exceeded the commercial/industrial CHHSL of 3,500 mg/kg. The 0.5-foot soil samples from the borings B1 (252 mg/kg), B3 (152 mg/kg), B4 (153 mg/kg) and B10 (354 mg/kg) exceeded the residential lead CHHSL of 150 mg/kg.

10.0 Conclusions of the Phase II ESA

Based on the results of the Phase II ESA completed by AEC at the Site, surficial soils at in the areas tested by AEC do not appear to be impacted by with petroleum hydrocarbons or VOCs. In addition, neither of these potential contaminants were found in subsurface soil samples collected from the former gasoline station at the southeast corner of Long Beach Avenue and East 40th Place.

Levels of the metals arsenic, cadmium and lead exceeded their respective CHHSLs in select surficial soil samples obtained from the study area. However, the levels are not ones that would represent an imminent threat to the environment or persons working on the farm.

11.0 Recommendations and Limitations of the Phase II ESA

B6

Based on the results of the soil sampling and analysis completed by AEC during the preparation of this assessment, additional assessment for TPH, VOCs and metals (excluding arsenic) does not appear to be warranted at this time. If TPL (or the future landowner) desires to take a conservative approach toward the level of arsenic found in soil boring B6 (90.3 mg/kg), soil in the vicinity of this boring can be excavated and disposed of at an offsite landfill or recycling facility. Confirmation soil sampling and analysis will be required to ensure that the soil with the elevated arsenic levels is removed. In addition, no soil should be exported from the Site without evaluation of metals levels with respect to applicable waste characterization criteria. It is our understanding that export of soil from the Site is not planned at this time.

AEC's conclusions regarding the Site are based on the results of a limited subsurface sampling effort. Levels of contaminants measured at a given location may not be representative of conditions in other areas on the Site. In addition, conditions may change at any particular location as a function of time in response to natural conditions, chemical reactions and other factors. Our conclusion regarding the condition of the Site does not represent a warranty that all areas of the Site are similar to those sampled. In addition, this assessment is not meant to serve as an evaluation of the potential uptake of metals to fruits or vegetables grown on the farm. Comparative criteria for metals in soil with respect to plant uptake are not published at this time.

12.0 References

ASTM, "Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process," ASTM Designation E 1527-00, Published July 2000;

Bradford et al. (1996). Background Concentrations of Trace and Major Elements in California Soils. Kearney Foundation of Soil Science Division of Agriculture and Natural Resources, University of California.

California Regional Water Quality Control Board. California State Water Resources Control Plan for the Los Angeles Region, Published 1994.

Historical fire insurance maps and city directory listings provided by EDR;

Previous Environmental Reports (see Section 5.5.1);

State of California Department of Conservation, Division of Oil and Gas And Geothermal Resources: http://www.consrv.ca.gov/DOG/maps/index_map.htm;

USGS topographic map, Los Angeles, California Quadrangle (1994).

APPENDIX F - CREDENTIALS

RESUME

Eric C. Fraske, E.I.T.

Environmental Department Manager, Long Beach, California

Education

Bachelor of Science: Major-Civil Engineering
Michigan State University: May 2004

Certifications/Registrations/Technical Training

Certified EIT, Michigan, 2004

Professional Experience

Mr. Fraske is the department manager for the environmental group of the Long Beach, California office of PSI. As department manager, Mr. Fraske oversees all environmental projects. These include Phase I, Phase II, and Phase III Environmental Assessments, storm water management services, and soil and groundwater remediation projects. His responsibilities include coordinating personnel and equipment resources to ensure client satisfaction. Mr. Fraske is closely involved with clients, potential clients, and projects in order to form strong alliances and long lasting working relationships. His work involves extensive client contact, program quality assurance/quality control (QA/QC), and liaison with federal, state, and local regulatory agencies.

Prior to joining PSI, Mr. Fraske worked as a field technician for an air quality firm from 2002 to 2004. As a field technician, his work experience included ambient air sampling, gas emissions testing, pollution modeling, compliance demonstrations, TRIS, report development, and industrial air permitting.

Environmental Services

Mr. Fraske has conducted several Phase I ESAs for commercial lenders, local and nationwide banks, and real-estate developers. Transactions included mergers and acquisitions, and refinancing.

Representative Phase I Environmental Site Assessments Project Experience

- Industrial Building, Compton, California, 2005
- Best Western Hotel, Venice, California 2005
- The Lamar Corporation Center, Palm Springs, California 2005
- 60,000 Acres of Timberland in South Georgia, 2005
- 6,000 Acre Former Cattle Farm, Bleckley County, Georgia, 2005
- Five Savannah Area Banks, Savannah, Georgia 2005
- Five Volvo Equipment Dealerships, Savannah, Macon, Marietta, Atlanta, and Augusta, Georgia 2005
- ING office Building, Atlanta, Georgia 2005
- Gwinnett Residence Inn, Duluth Georgia, 2004
- Southwood 75 Business Park, Jonesboro, Georgia, 2004
- Various Fiber Optic Cable Sites, Marietta, Georgia, 2004
- Arlington East Apartments, Chattanooga, Tennessee, 2004
- CVS, Gadsden Alabama, 2004
- Wal-Mart Supercenter, Douglasville, Georgia, 2004
- Palmetto One Stop, Palmetto, Georgia, 2004
- Hess Oil, Athens, Georgia, 2004
- 61 Whitcher Street Physicians Center, Marietta, Georgia, 2004
- Multiple Burger King Restaurants, New York, New York, 2004

RESUME

Mr. Fraske has performed Phase II Subsurface Investigations for commercial lenders, state environmental protection agencies, and private individuals at several commercial real estate properties.

Representative Phase I Environmental Site Assessments Project Experience

- Former Nike Missile Site, Rancho Palos Verdes, California 2005
- Former Wastewater Treatment Plant, Fort Oglethorpe, Georgia 2005
- Friendship Baptist Church, Atlanta, Georgia 2005
- Former Dry Cleaner, Atlanta, Georgia 2005
- Amwiler Business Park, Chamblee, Georgia, 2005
- 6,000 Acre Former Cattle Farm, Bleckley County, Georgia, 2005
- Three former gasoline stations, Savannah, Georgia 2005

Mr. Fraske has conducted groundwater sampling in accordance with a Corrective Action Plan (CAP) Part B, prepared for Emory-Northlake Regional Medical Center and approved by the Georgia Environmental Protection Division (GAEPD) Underground Storage Tank Management Program (USTMP). Tasks Include: operations and maintenance of a total fluids free product recovery system, well surveys, well development, groundwater sampling and effluent sampling of treated groundwater.

Representative Phase I Environmental Site Assessments Project Experience

- 6,000 Acre Former Cattle Farm, Bleckley County, Georgia, 2005
- Former Wastewater Treatment Plant, Fort Oglethorpe, Georgia 2005
- Former Gasoline Station, Dalton, Georgia, 2005
- Peachtree Mitsubishi, Doraville, Georgia, 2004

Years experience with other firms: **2**
Year started with PSI: **2004**

APPENDIX G

PHASE II AND LIMITED PHASE III ENVIRONMENTAL SITE ASSESSMENT, OCTOBER 9, 2006

PHASE II AND LIMITED PHASE III ENVIRONMENTAL SITE ASSESSMENT

For the

KEN-1 PROPERTY AT
THE NORTHEAST CORNER OF EAST 41ST STREET
AND LONG BEACH BOULEVARD
LOS ANGELES, CALIFORNIA 90058

Eric Fraske, EIT
Department Manager

Michael Mooradian, REA
Chief Scientist

Prepared for

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PSI PROJECT NO. 559-6G017

October 9, 2006

TABLE OF CONTENTS

1 INTRODUCTION 1
1.1 AUTHORIZATION 1
1.2 SITE DESCRIPTION 1
1.3 PROJECT BACKGROUND 1
1.4 SITE CHARACTERISTICS 2
2 ASSESSMENT ACTIVITIES 4
2.1 PRE-SAMPLING ACTIVITIES 4
2.2 SOIL SAMPLING 4
2.3 LIMITATIONS 5
3 QUALITY CONTROL OBJECTIVES AND ANALYSIS 6
4 RESULTS 7
4.1 SOIL SAMPLE RESULTS 7
5 INTERPRETATION 8
5.1 HEAVY METAL CONTAMINATION IN SUBSURFACE SOILS 8
6 CONCLUSIONS 10
6.1 CONCLUSIONS 10
6.2 RECOMMENDATIONS 10
7 WARRANTY 12
7.1 WARRANTY 12
7.2 USE BY THIRD PARTIES 13

LIST OF FIGURES

FIGURE 1: SITE VICINITY MAP
FIGURE 2: SITE AREA AND SAMPLE LOCATION MAP
FIGURE 3: ARSENIC, CADMIUM, AND LEAD CONCENTRATIONS IN SOIL IN EXCESS OF REGULATORY CRITERIA
FIGURE 4: TOTAL CONCENTRATIONS OF CHROMIUM IN EXCESS OF THE RESIDENTIAL LAND USE CHHSL FOR HEXAVALENT CHROMIUM
FIGURE 5: TOTAL CONCENTRATIONS OF LEAD IN EXCESS OF 10 TIMES THE SOLUBLE THRESHOLD LIMIT CONCENTRATION

LIST OF TABLES

TABLE 1: CONCENTRATIONS OF METALS IN SOIL

LIST OF APPENDICES

APPENDIX A - HEALTH AND SAFETY PLAN AND FIELD PROCEDURES
APPENDIX B - SOIL BORING LOGS
APPENDIX C - LABORATORY ANALYTICAL REPORT AND CHAIN OF CUSTODY RECORDS

1 INTRODUCTION

A Phase I Environmental Site Assessment (ESA) was conducted on the subject property by PSI in 2006, known as Ken-1, located at the northeast corner of Long Beach Boulevard and East 41st Street, Los Angeles, California. The Phase I ESA identified prior reports that indicated concentrations of regulated metals are present in the subsurface soils throughout the property in excess of regulatory levels. As a result, PSI was retained to conduct a Phase II and Limited Phase III ESA to develop information with respect to the documented metals contamination identified in the Phase I ESA, including verifying the presence of the regulated metals and developing preliminary information on the extent and magnitude of soil contamination. The objective of this investigation includes the following:

- Assess the soil condition beneath the subject property in the upper 15 feet of the soil profile with respect to California Title 22 regulated metals. No other constituents or compounds were investigated as part of this assessment.

This report documents the scope of work, field investigation activities, laboratory analyses, and evaluation of data with respect to the recognized environmental condition assessed. The assessment was conducted in general accordance with American Society of Testing and Materials (ASTM) Standard E 1903-97, Standard Guide for Environmental Site Assessments: Phase II Environmental Site Assessment Process.

1.1 AUTHORIZATION

Authorization to perform the assessment was given on September 20, 2006, by a signed copy of a contract between Alameda Holdings, LLC and PSI. Access to the property was provided by Mr. Ken Coward of Colliers International.

1.2 SITE DESCRIPTION

The subject property is situated at the northeast corner of East 41st Street and Long Beach Boulevard in the City of Los Angeles, Los Angeles County, California, as shown on Figure 1. The property is bound by Long Beach Boulevard to the west; Martin Luther King Boulevard to the north; Alameda Street to the east; and East 41st Street to the south.

The Ken-1 project site is approximately 14 acres of vacant graded land. One paved road (East 40th Place) traverses the property east to west across the middle of the property, as shown in Figure 2. No evidence of wells, drains, or subterranean structures were observed during site reconnaissance. Various plants and debris pile from a former on-site farm was scattered throughout the subject property. No structures are currently present on the subject site.

1.3 PROJECT BACKGROUND

PSI understands that Alameda Holdings, LLC plans to develop the property with commercial/light industrial developments. The property is currently developed as vacant urban farm.

PSI's 2006 Phase I ESA revealed that various commercial and industrial tenants have occupied the subject property from 1928 to approximately 1994. These businesses include former dry cleaning facility, a furniture company, a foundry, and an automotive service station.

Prior reports reviewed as part of the 2006 Phase I ESA prepared by PSI, revealed that subsurface soils at the subject property are impacted with elevated levels of Title 22 metals, petroleum hydrocarbons, and volatile organic compounds (VOCs). Concentrations of VOCs documented in these prior reports appeared to be below Environmental Protection Agency (EPA) Preliminary Region IX Preliminary Remediation Goals (PRGs) for residential soil. Concentrations of Title 22 metals in soil appeared to be above both PRGs and the California Department of Toxic Substances Control (DTSC) California Human Health Screening Levels (CHHSLs) for industrial and residential land use. No specific source of contamination was identified in the prior assessments. Previous reports suggested that these concentrations are consistent with average urban background levels and also may be a result of past releases from the variety of industrial and commercial tenants that formerly occupied the subject property. While most of these levels appear to be below regulatory guideline levels for industrial soils, some of the soils, based on the documented concentrations of metals, if taken off-site for disposal will require further analysis to determine if they will be classified as a hazardous waste.

1.4 SITE CHARACTERISTICS

Soil Conditions

According to the previous 2006 Phase I ESA report prepared for the subject property dated May 25, 2006, the site lies within the Peninsular Ranges Geologic Province of California. This geomorphic province is traversed by a group of northwest trending sub-parallel fault zones and encompasses an area that extends 125 miles from the Transverse Ranges and the Los Angeles Basin south to the Mexican Border and beyond another 775 miles to the tip of Baja California. Rocks within the Peninsular Range Province were emplaced during the Cretaceous age organic events and uplifted into the present mountain ranges during the late Tertiary and Quaternary. Igneous, metamorphic and sedimentary rocks are all found within the Peninsular Ranges. They are seismically active, with several known active faults crossing the Province.

The subject property is underlain by Holocene age alluvial fan deposits that consist of loose to medium dense sand, silt and gravel.

According to the United States Department of Agriculture Soil Conservation Service Soil Survey of Los Angeles County, California (revised 1969); the soil underlying the subject site is classified in the Hanford association, 2 to 5 percent slopes. Hanford association soils are characterized as occurring on gently sloping alluvial fans between elevations of near sea level and 3,500 feet. Hanford soils are over 60 inches deep, and are well drained with moderately rapid subsoil permeability. Surface soil layers are pale-brown coarse sandy loam and about 8 inches thick underlain by light yellowish-brown coarse sandy loam and gravelly loamy coarse sand. Soil layers are slightly acid to mildly alkaline throughout but occasionally are calcareous in the lower part.

Hydrogeology

According to information reported on the State Water Resources Control Board Geotracker website for a Leaking Underground Fuel Tank investigation located at 4641 Pacific Boulevard, approximately 1.25 mile southeast and topographically down-gradient of the subject property, depth to groundwater was reported at approximately 34 feet below ground surface (bgs) in 2006. Groundwater flow direction was reported to the northeast. Depth to groundwater information specific to the subject property or adjoining properties was not identified.

The site-specific stratigraphy was assessed from the soil samples collected from borings drilled on the site as part of this investigation. Based on field observations, the upper fifteen feet of subsurface materials consist of silty sand mixtures and sandy layers to the maximum depth investigated of 15 feet bgs. Groundwater was not detected within the maximum boring depth of 15 feet bgs.

2 ASSESSMENT ACTIVITIES

Prior to the field investigation, PSI contacted Dig Alert as required to locate public utilities. Utilities were marked by the respective utility companies where they entered or were located adjacent to the site. The field investigation and sampling activities were conducted on September 20-22, 2006, under the supervision of Mr. Moises Delgadillo, Staff Geologist for PSI. A site specific Health and Safety Plan was prepared and distributed to on-site personnel. A copy of this Health and Safety Plan is included in Appendix A. Field procedures and sampling protocols used for this assessment are presented in Appendix A.

2.1 PRE-SAMPLING ACTIVITIES

PSI contracted Pacific Coast Locators, a private utility locating company, to locate utilities on site and clear soil borings placed by PSI.

A Bobcat earth mover and a PSI operator were brought on site to provide clearance to and from soil boring locations, as the site contained dense vegetation and piles of debris which made vehicle access to soil boring locations difficult.

2.2 SOIL SAMPLING

PSI implemented soil sampling activities that included the drilling of 20 shallow soil borings (B-1 through B-20) in a grid pattern using a hollow stem auger drill rig. The borings were placed as shown on Figure 2.

The hollow stem drill rig was operated by Jet Drilling, Inc. The borings were drilled to a depth of approximately 15 feet bgs, where possible. The soil samples were obtained with a hollow stem auger using a down-hole sampler composed of a modified California split-spoon sampler lined with 2.0-inch diameter brass sleeves. The sampler is attached to the drive rod and advanced 18 inches into undisturbed soil below the lead auger with a 140-pound hammer that is repeatedly dropped from a 30 inch height. Each brass sleeve is recovered from the sampler, sealed with Teflon sheets and plastic end caps on both ends, labeled, and placed in an ice chest for transport to Sunstar Laboratories, Inc., a California-certified laboratory in Tustin, California. All samples were transported with chain-of-custody documentation.

Additionally, a representative aliquot of the soil sample was field screened by a photo-ionization detector (PID). A portion of the sample was also retained for visual description using the Unified Soil Classification System (USCS). The field observations were entered onto boring logs, which are provided in Appendix B.

The sampling equipment was decontaminated between each sampling event, and the drilling equipment was decontaminated between each boring. The borings were backfilled with soil cuttings. Investigation derived waste was not generated during the drilling process.

The soil samples were analyzed by Sunstar Laboratories, Inc., for Title 22 metals by EPA Method 6010 and pH.

2.3 LIMITATIONS

The assessment was completed in general accordance with the authorized scope of work with the following exceptions:

- Soil borings were placed in a grid-like pattern throughout the site where conditions allowed. Soil boring locations were moved based upon vehicle accessibility and utility clearance.

- Soil boring B-19 encountered refusal at a depth of approximately 5 feet bgs due to undetected utility lines encountered during soil sampling activities. A soil sample was collected and analyzed at a depth of one foot bgs.

- No sample recovery was encountered at a depth of 5 feet bgs in soil boring B-1. Soil samples were collected and analyzed at depths of 1, 10 and 15 feet bgs.

3 QUALITY CONTROL OBJECTIVES AND ANALYSIS

The data quality objectives for this project were developed to provide reliable information to assess the subject property. Quality Control (QC) samples were collected as part of the soil sampling activities. A duplicate quality control soil sample was collected for every 10 soil samples collected for analysis. These samples were analyzed for the same parameters as the primary samples. The data quality objectives selected for this assessment include a margin of precision between duplicate samples of +/- 20% for water and +/- 40 % for soil. The larger limit for soil was chosen based on the difficulty to get a true duplicate sample because of the heterogeneity of the subsurface soils. All QC samples were within acceptable limits.

4 RESULTS

The results of the field investigation and laboratory analyses are presented in the following section. Where appropriate, the results are compared with the following regulatory limits for the chemicals and compounds identified in the applicable media. The laboratory report along with the chain-of-custody documents are provided in appendix C.

- Concentrations of metals in soil were compared to the CHHSLs and PRGs for both industrial and residential land use conditions. For disposal characterization, concentrations of soil were also compared to the California Total Threshold Limit Concentrations (TTLC) and the Soluble Threshold Limit Concentration (STLC).

4.1 SOIL SAMPLE RESULTS

Soil samples were collected at 20 locations (borings B-1 through B-20) at depths ranging from 1 foot to 15 feet bgs. Soil boring locations are shown on Figure 3. Shown in Table 1 are the analytical results of the collected soil. Locations where laboratory analysis revealed concentrations metals above applicable threshold limits are highlighted in bold text.

Concentrations of metals in soils were compared to the CHHSLs and PRGs to assess the volume of impacted soil that may require remediation. These concentrations along with the CHHSLs and PRGs are shown in Table 1. The results indicate that exceedences of the CHHSLs and PRGs are limited to arsenic in nine locations throughout the property. These samples were generally reflective of shallow conditions at 1 foot bgs with the exception of one sample collected at B-13 at a depth of 5 feet bgs as shown in Figure 3. Cadmium and lead were detected above their respective CHHSLs but not their respective PRGs in samples collected at four locations at a depth of 1 foot bgs as shown in Figure 3. Concentrations of total chromium were detected in excess of the CHHSL for hexavalent chromium (17 milligrams per kilogram [mg/kg]) at 21 locations at depths ranging from 1 foot to 10 feet bgs as shown on Figure 4. Chromium naturally exists in two forms: trivalent and hexavalent chromium. The CHHSL for trivalent chromium is significantly higher (100,000 mg/kg) than hexavalent chromium. Speciation of total chromium detected in the collected samples was not conducted as part of this assessment.

5 INTERPRETATION

PSI reviewed the information collected as part of the Phase I ESA, the data collected in this field program, and our knowledge of the proposed land use to assess the conditions on the property. PSI understands that the proposed land use of the property is mixed commercial/light industrial.

5.1 HEAVY METAL CONTAMINATION IN SUBSURFACE SOILS

5.1.1 ARSENIC

Concentrations of arsenic in soil samples that exceeded both the industrial land use CHHSLs and industrial land use PRGs were detected at nine (9) locations throughout the property. These concentrations were found in samples collected from the upper 1 foot of soil except at one location (B-13) at a depth of 5 feet bgs. The samples collected at depths of 10 and 15 feet bgs appear to be below industrial land use regulatory action levels. As a result, the lower limit of the impacted soil may be less than 10 feet bgs.

Concentrations of arsenic were detected at the remaining 67 locations below the method detection limit (MDL) of 0.22 mg/kg and, as a result, are below the residential land use PRG for arsenic (0.39) but above the residential land use CHHSL for arsenic (0.07 mg/kg). Because of the MDL is higher than the residential land use CHHSL it is unknown if they are below the residential land use CHHSL. The laboratory analysis methodology selected for this assessment was chosen because previous assessments reviewed during the 2006 Phase I ESA indicated arsenic concentrations in subsurface soils significantly higher then the MDL.

5.1.2 CADMIUM

Concentrations of cadmium in excess of the residential CHHSL were detected at four locations (B11, B12, B16 and B18) with concentrations ranging from 1.7 to 2.3 mg/kg at a depth of 1 foot bgs. The samples collected at depths of 5, 10, and 15 feet bgs appear to be below regulatory action levels. As a result, the lower limit of the impacted soil may be less than 5 feet bgs. These concentrations are below the industrial land use CHHSL (3,500 mg/kg) and industrial land use PRG (800 mg/kg).

5.1.3 LEAD

Concentrations of lead in excess of the residential CHHSL were detected at two locations (B11 [230 mg/kg] and B18 [310 mg/kg]) at a depth of 1 foot bgs. The samples collected at depths of 5, 10, and 15 feet bgs appear to be below regulatory action levels. As a result, the lower limit of the impacted soil may be less than 5 feet bgs. These concentrations are below the industrial land use CHHSL (3,500 mg/kg) and industrial land use PRG (800 mg/kg).

5.1.4 CHROMIUM

Concentrations of total chromium were detected in excess of the residential CHHSL for hexavalent chromium (17 mg/kg) at 21 locations at depths ranging from 1 foot to 10 feet bgs.

Chromium naturally exists in to forms: trivalent and hexavalent chromium. The CHHSL for trivalent chromium is significantly higher (100,000 mg/kg) than hexavalent chromium. Speciation of total chromium detected in the collected samples was not conducted as part of this assessment.

5.1.5 WASTE CHARACTERIZATION

Based solely on the CHHSLs and PRGs, soils with concentrations of metals below the CHHSLs and PRGs typically would not require remediation. However, because some of this soil beneath may be excavated and disposed of to accommodate the proposed development, the soil may be required to meet the specific acceptance concentrations of a disposal facility. Based on the concentration of metals found in the soil, as well as other criteria, the price for disposing of the non-hazardous soil may vary substantially. Soil that may be certified as "clean" by the owner with supporting analytical results may be disposed as clean fill whereas elevated concentrations of constituents may require disposal at specified facilities where the costs are significantly higher.

As a result, the concentrations of metals in soils were also compared to the TTLC and STLC to assess disposal requirements. Total concentrations in excess of the TTLC are considered hazardous and below the STLC are non hazardous. Total concentrations of metals that exceed their specific STLC value and are less than the specific TTLC value, typically require further analysis by the California Waste Extraction Test (WET) to determine the resulting soluble concentration. The WET results are then compared to the STLC. If the WET concentration is greater than the STLC then the concentration is considered hazardous. For this scope, the WET was not performed and the total concentrations were compared to the STLC. Typically soil samples with total concentrations of metals less than ten times the STLC have soluble concentrations below the STLC. As a result, ten times the STLC concentration is often used by a landfill as a "rule of thumb" for disposal. The total concentrations of Title 22 metals found in samples collected from the subject property are generally below ten times the STLC with the exception of concentrations of lead detected at nine locations at depths of one foot and 10 feet bgs as shown in Figure 5. If desired, WET analysis can be performed to estimate the volume of soil that if disposed of, may require special handling or disposal. This analysis is time sensitive and would need to be conducted within the next six months to avoid exceeding the laboratory hold time.

6 CONCLUSIONS AND RECOMMENDATIONS

The purpose of the Phase II and Limited Phase III ESA was to develop information with respect to the recognized environmental conditions identified in the Phase I ESA, including verifying the presence of the RECs and developing preliminary information on the extent and magnitude of soil contamination.

6.1 CONCLUSIONS

Based on the results of this investigation, the following conclusions and recommendations are presented.

- Concentrations of arsenic are present in the subsurface soil in nine locations throughout the property in excess of regulatory action levels for industrial land use. A majority of these locations are located at a depth of one foot bgs with the exception of the sample collected at B-13 at a depth of five feet bgs. It appears that arsenic concentrations in the soils at a depth of five feet bgs and deeper are below acceptable criteria for industrial land use throughout a majority of the property based on the CHHSLs.

- Concentrations of cadmium, lead and total chromium are present in the subsurface soils throughout the property in excess of regulatory action levels for residential land use but below industrial land use regulatory action levels. Analysis for hexavalent chromium species is recommended to assess the likely presence of this highly toxic specie of total chromium.

- Based solely on the CHHSLs and PRGs, soils with concentrations of metals below the CHHSLs and PRGs typically would not require remediation; however, only a regulatory agency can determine if remediation would be required.

- Total concentrations of lead are present in the subsurface soil in nine locations in excess of ten times the STLC. These samples should be further analyzed using the California WET to determine soluble concentrations which is important to assess if the soil is considered hazardous and therefore determining final disposition of this soil.

6.2 RECOMMENDATIONS

Based on investigation of the property for evidence of recognized environmental conditions, PSI offers the following recommendations.

- Based on what PSI understood to be the future development plans for the subject property (commercial/industrial), laboratory analysis results were compared to industrial regulatory criteria. If future development plans call for residential use, residential regulatory criteria will have to be used and may require further analysis.

- Chromium speciation analysis should be performed on the 21 soil samples that contained concentrations of total chromium in excess of the residential land use CHHSL for hexavalent chromium. This analysis is time sensitive and would require being conducted by October 20, 2006 to avoid exceeding the laboratory hold time.

- WET analysis are recommended for nine samples containing concentrations of lead in excess of 10 times the lead STLC to estimate the volume of soil that if disposed of, may require special handling or disposal. This analysis is time sensitive and would need to be conducted within the next six months to avoid exceeding the laboratory hold time.

7 WARRANTY

7.1 WARRANTY

PSI warrants that the findings and conclusions of the Phase II and Limited Phase III ESA reported herein were conducted in general accordance with ASTM Standard E 1903-97 protocol. These methodologies are described by the standard guide as representing good commercial and customary practice for conducting a Phase II and Limited Phase III Environmental Site Assessment of a parcel of property for the purpose of evaluating recognized environmental conditions. However, these findings and conclusions contain all of the limitations inherent in these methodologies which are referred to in the standard guide and some of which are more specifically set forth below.

The Phase II and Limited Phase III Environmental Site Assessment has been developed to provide the client with information regarding apparent indications of recognized environmental conditions relating to the subject property. It is necessarily limited to the conditions observed and to the information available at the time of the work. The assessment and conclusions presented herein were based upon the subjective evaluation of limited data. They may not represent all conditions at the subject site as they reflect the information gathered from specific locations. PSI warrants that the findings and conclusions contained herein have been promulgated in accordance with generally accepted environmental investigation methodology and only for the site described in this report.

The professional services provided in preparing the Limited Phase III assessment have been performed in accordance with practices generally accepted by other appropriate environmental professionals, geologists, hydrologists, hydrogeologists, engineers, and environmental scientists practicing in this field and directed by the client. No other warranty, either expressed or implied, is made. PSI is not an insurer and makes no guarantee or warranty that the services supplied will avert or mitigate occurrences, or the consequences of occurrences, that the services are designed to prevent or ameliorate. As with all environmental assessments, there is no guarantee that the work conducted has identified any and all sources or locations of petroleum hydrocarbons or hazardous substances or chemicals in the soil or groundwater. This report is issued with the understanding that the Hanover R.S. Limited Partnership is responsible for ensuring that the information contained in this report is brought to the attention of the appropriate regulatory agency, if any.

Due to the limited nature of the work, there is a possibility that there may exist conditions which could not be identified within the scope of the assessment or which were not apparent at the time of report preparation. It is also possible that the testing methods employed at the time of the report may later be superseded by other methods. The description, type, and composition of what are commonly referred to as "hazardous materials or conditions" can also change over time. PSI does not accept responsibility for changes in the state of the art, nor for changes in the scope of various lists of hazardous materials or conditions. PSI believes that the findings and conclusions provided in this report are reasonable. However, no other warranties are implied or expressed.

7.2 USE BY THIRD PARTIES

This report was prepared pursuant to the contract between PSI and Alameda Holdings, LLC. That contractual relationship included an exchange of information about the subject site that was unique and between PSI and its client and serves as the basis upon which this report was prepared. Because of the importance of the communication between PSI and its client, reliance or any use of this report by anyone other than Alameda Holdings, LLC, for whom it was prepared, its successors and assigns, is prohibited and therefore not foreseeable to PSI.

Reliance or use by any such third party without explicit authorization in the report does not make said third party a third party beneficiary to PSI's contract with Alameda Holdings, LLC. Any such unauthorized reliance on or use of this report, including any of its information or conclusions, will be at third party's risk. For the same reasons, no warranties or representations, expressed or implied in this report, are made to any such third party.

Third party reliance letters may be issued on request and payment of the, then current fee for such letters. All third parties relying on PSI's reports, by such reliance, agree to be bound by the proposal and PSI's General Conditions. No reliance by any party is permitted without such agreement, regardless of the content of the reliance letter itself.

TABLES

Metals by EPA 6010

Boring Location	Depth (ft.)	pH	Antimony	Silver	Arsenic	Barium	Berylliu
B1	1	6.8	<3	<2	<0.22	160	<1
B1	10	7.3	<3	<2	<0.22	84	<1
B1	15	7.4	<3	<2	<0.22	31	<1
B2	1	7	<3	<2	<0.22	140	<1
B2	5	7.4	<3	<2	<0.22	130	<1
B2	10	7.4	<3	<2	<0.22	100	<1
B2	15	8	<3	<2	<0.22	120	<1
B3	1	7.6	<3	<2	<0.22	150	<1
B3	5	7.9	<3	<2	<0.22	190	<1
B3	10	8.5	<3	<2	<0.22	40	<1
B3	15	8.3	<3	<2	<0.22	51	<1
B4	1	7.8	<3	<2	**1.8*Â**	80	<1
B4	5	7.8	<3	<2	<0.22	91	<1
B4	10	7.8	<3	<2	<0.22	230	<1
B4	15	7.7	<3	<2	<0.22	96	<1
B5	1	8	<3	<2	<0.22	160	<1
B5	5	8.3	<3	<2	<0.22	65	<1
B5	10	8	<3	<2	<0.22	78	<1
B5	15	8.1	<3	<2	<0.22	96	<1
B6	1	6.5	<3	<2	**1.0*Â**	180	<1
B6	5	7.1	<3	<2	<0.22	140	<1
B6	10	6.8	<3	<2	<0.22	140	<1
B6	15	7.3	<3	<2	<0.22	96	<1
B7	1	7.4	<3	<2	<0.22	150	<1
B7	5	7.4	<3	<2	<0.22	140	<1
B7	10	7.6	<3	<2	<0.22	42	<1
B7	15	8	<3	<2	<0.22	43	<1
B8	1	7.2	<3	<2	**1.4*Â**	130	<1
B8	5	7.3	<3	<2	<0.22	140	<1
B8	10	7.2	<3	<2	<0.22	23	<1
B8	15	7.1	<3	<2	<0.22	30	<1
B9	1	7.1	<3	<2	<0.22	200	<1
B9	5	7.3	<3	<2	<0.22	220	<1
B9	10	7.2	<3	<2	<0.22	150	<1
B9	15	6.8	<3	<2	<0.22	50	<1
B10	1	6.5	<3	<2	**1.8*AB**	210	<1
B10	5	7.1	<3	<2	<0.22	56	<1
B10	10	7	<3	<2	<0.22	130	<1
B10	15	7.2	<3	<2	<0.22	31	<1
B11	1	7.3	<3	<2	<0.22	170	<1
B11	5	7.3	<3	<2	<0.22	190	<1
B11	10	7.6	<3	<2	<0.22	130	<1
B11	15	7.9	<3	<2	<0.22	38	<1
B12	1	6.7	<3	<2	**2.6*AB**	160	<1
B12	5	7	<3	<2	<0.22	220	<1
B12	10	7.2	<3	<2	<0.22	78	<1
B12	15	7.6	<3	<2	<0.22	53	<1
B13	1	6.8	<3	<2	**19*AB**	200	<1
B13	5	7	<3	<2	**11*AB**	210	<1
B13	10	7.3	<3	<2	<.0.22	120	<1
B13	15	7.6	<3	<2	<0.22	30	<1
B14	1	6.8	<3	<2	**0.85*Â**	190	<1
B14	5	7.2	<3	<2	<0.22	120	<1
B14	10	7.2	<3	<2	<0.22	95	<1
B14	15	7.4	<3	<2	<0.22	63	<1
B15	1	6.8	<3	<2	<0.22	110	<1
B15	5	7.3	<3	<2	<0.22	74	<1
B15	10	7.1	<3	<2	<0.22	99	<1
B15	15	7.4	<3	<2	<0.22	56	<1
B16	1	7.4	<3	<2	<0.22	190	<1
B16	5	7.3	<3	<2	<0.22	170	<1
B16	10	7.4	<3	<2	<0.22	44	<1
B16	15	7.6	<3	<2	<0.22	46	<1
B17	1	7.3	<3	<2	<0.22	140	<1
B17	5	7.6	<3	<2	<0.22	110	<1
B17	10	7.5	<3	<2	<0.22	49	<1
B17	15	7.8	<3	<2	<0.22	62	<1

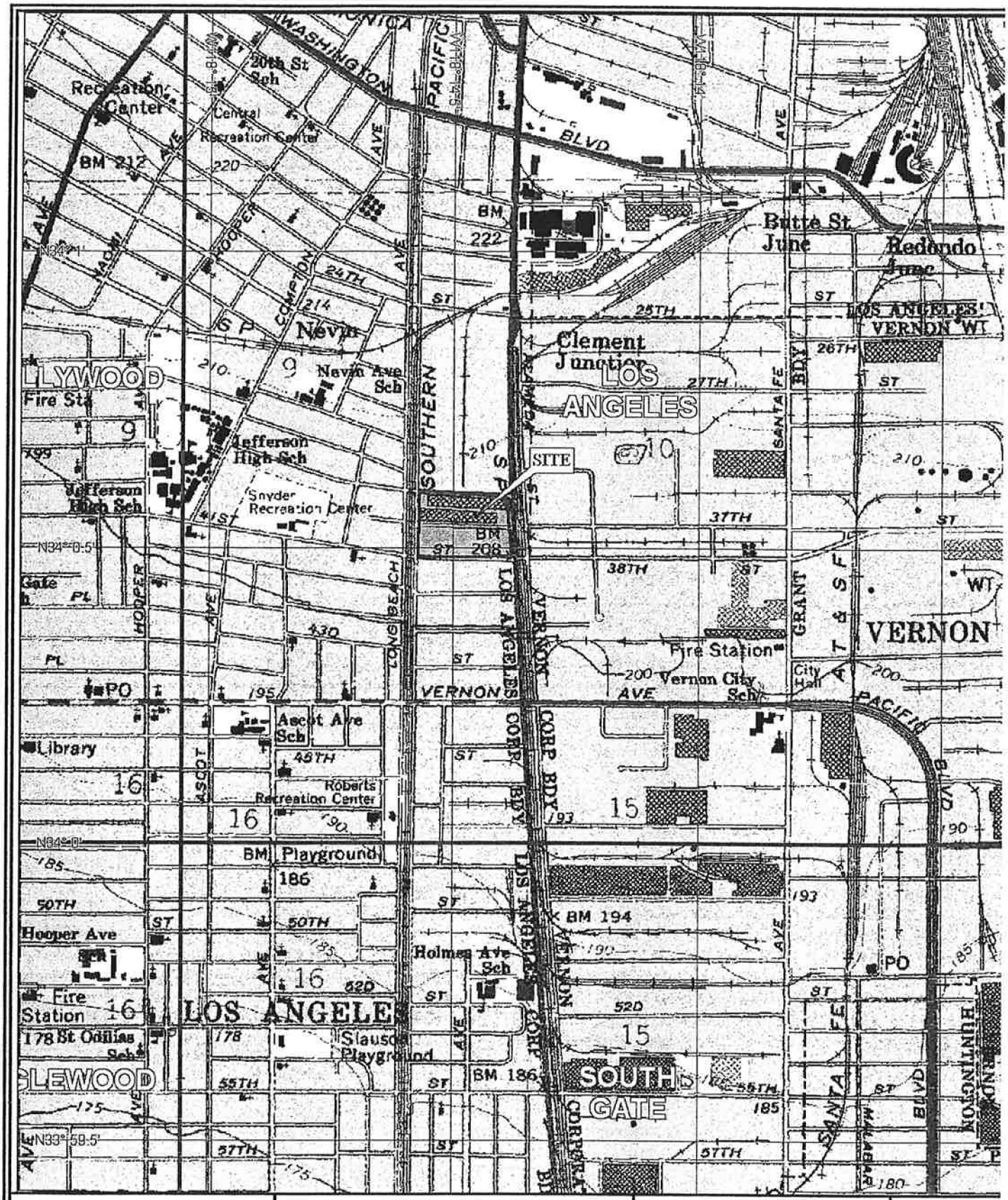
Metals by EPA 6010

Boring Location	Depth (ft.)	pH	Antimony	Silver	Arsenic	Barium	Beryllium
B18	1	7	<3	<2	6.9*AB	160	<1
B18	5	7.4	<3	<2	<0.22	110	<1
B18	10	7.2	<3	<2	<0.22	73	<1
B18	15	7.8	<3	<2	<0.22	42	<1
B19	1	7.2	<3	<2	<0.22	240	<1
B20	1	7.5	<3	<2	<0.22	58	<1
B20	5	7.7	<3	<2	<0.22	31	<1
B20	10	8.2	<3	<2	<0.22	22	<1
B20	15	7.4	<3	<2	<0.22	43	<1
California Human Health Screening Levels for Residential Soil		NL	**30**	**380**	**0.07**	**5200**	**150**
EPA Region IV Preliminary Remediation Goal for Residential Soil		NL	**31**	**390**	**0.39**	**5400**	**150**
California Human Health Screening Levels for Industrial Soil		NL	**380**	**4800**	**0.24**	**63000**	**1700**
EPA Region IV Preliminary Remediation Goal for Industrial Soil		NL	**410**	**5100**	**1.6**	**67000**	**1900**
Soluble Threshold Level Concentration according to Title 22 in California (mg/l)		NL	**15**	**5**	**5**	**100**	**0.75**
10X Soluble Threshold Level Concentration according to Title 22 in California		NL	**150**	**50**	**50**	**1000**	**7.5**
Total Threshold Level Concentration according to Title 22 in California		NL	**500**	**500**	**500**	**10000**	**75**

Notes:
All values are shown in milligrams per Kilogram (mg/Kg)

NL	Compound is not listed
100000/17[1]	Chromium III/Chromium IV
<2	Concentration is below laboratory detection limit
12*	Concentration exceeds the California Human Health Screening Levels for Residential Soil
12	Concentration exceeds the EPA Region IV Preliminary Remediation Goal for Residential Soil
12*A	Concentration exceeds the California Human Health Screening Levels for Industrial Soil
12B	Concentration exceeds the EPA Region IV Preliminary Remediation Goal for Industrial Soil
12	Concentration exceeds theTitle 22 Soluble Threshold Level Concentration (STLC)
120	Concentration exceeds 10X the Title 22 STLC
1,200	Concentration exceeds the Title 22 Total Threshold Level Concentration (TTLC)

FIGURES



psi Information To Build On
Engineering • Consulting • Testing

3960 Gilman Street
Long Beach, CA 90815
562/597-3977

PROJECT NAME:

Ken-1
Northwest corner of East 41st Street and South Alameda Avenue
Los Angeles, California 90058

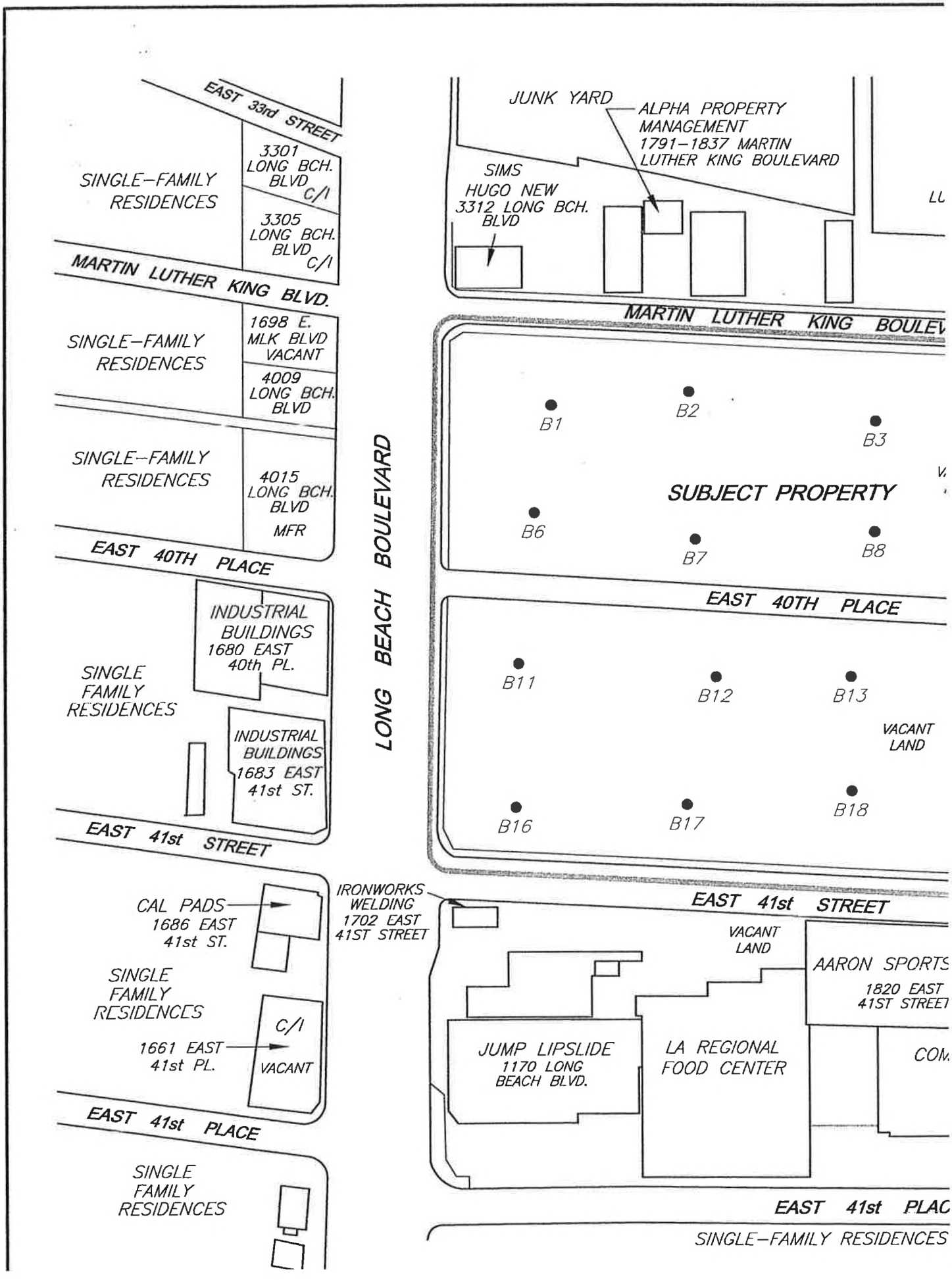
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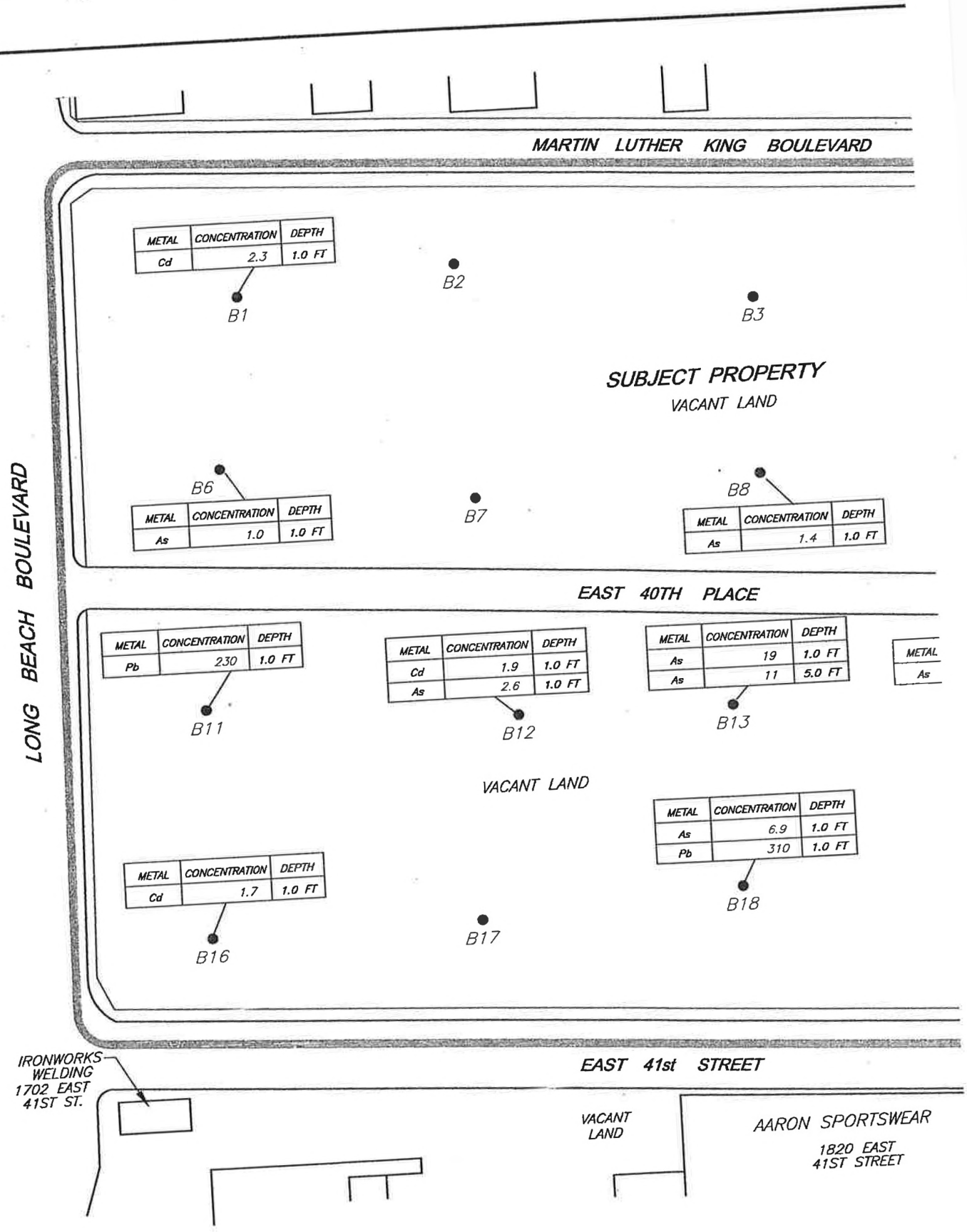
FIGURE 1 - SITE VICINITY MAP

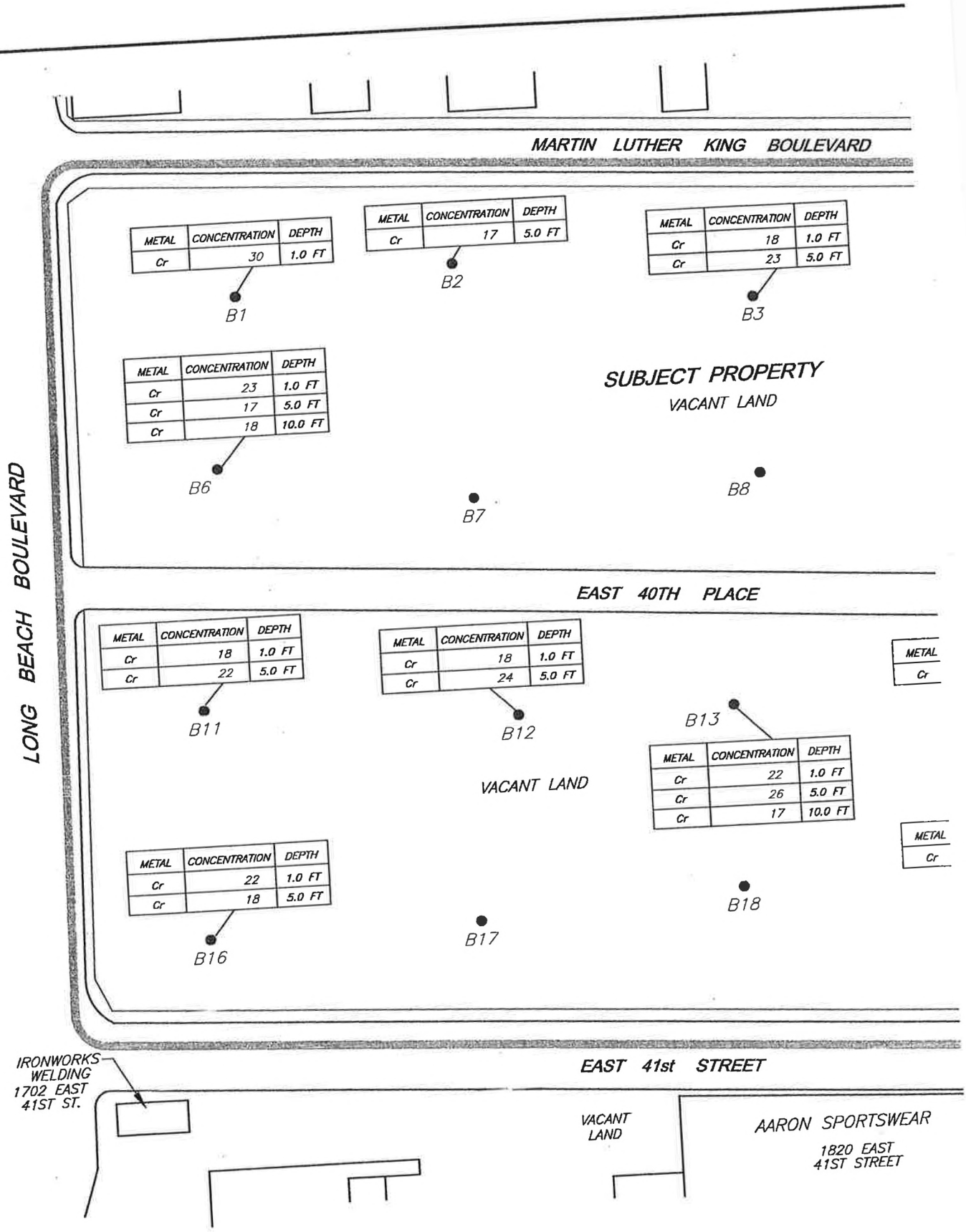
Map:
Los Angeles Quadrangle
7.5' USGS Topographic Map

Scale: 1: 16,000
Date: 1981

N


EAST 33rd STREET
3301 LONG BCH. BLVD C/I
3305 LONG BCH. BLVD C/I
SINGLE–FAMILY RESIDENCES
MARTIN LUTHER KING BLVD.
1698 E. MLK BLVD VACANT
4009 LONG BCH. BLVD
SINGLE–FAMILY RESIDENCES
4015 LONG BCH. BLVD MFR
SINGLE–FAMILY RESIDENCES
EAST 40TH PLACE
INDUSTRIAL BUILDINGS 1680 EAST 40th PL.
SINGLE FAMILY RESIDENCES
INDUSTRIAL BUILDINGS 1683 EAST 41st ST.
EAST 41st STREET
CAL PADS 1686 EAST 41st ST.
SINGLE FAMILY RESIDENCES
1661 EAST 41st PL.
C/I VACANT
EAST 41st PLACE
SINGLE FAMILY RESIDENCES
LONG BEACH BOULEVARD
JUNK YARD
ALPHA PROPERTY MANAGEMENT 1791–1837 MARTIN LUTHER KING BOULEVARD
SIMS HUGO NEW 3312 LONG BCH. BLVD
MARTIN LUTHER KING BOULEV
B1
B2
B3
SUBJECT PROPERTY
B6
B7
B8
EAST 40TH PLACE
B11
B12
B13
VACANT LAND
B16
B17
B18
IRONWORKS WELDING 1702 EAST 41ST STREET
EAST 41st STREET
VACANT LAND
AARON SPORTS 1820 EAST 41ST STREET
JUMP LIPSLIDE 1170 LONG BEACH BLVD.
LA REGIONAL FOOD CENTER
EAST 41st PLAC
SINGLE–FAMILY RESIDENCES


MARTIN LUTHER KING BOULEVARD
LONG BEACH BOULEVARD
EAST 40TH PLACE
EAST 41st STREET
SUBJECT PROPERTY
VACANT LAND
B1
B2
B3
B6
B7
B8
B11
B12
B13
B16
B17
B18
METAL | CONCENTRATION | DEPTH
Cd | 2.3 | 1.0 FT
As | 1.0 | 1.0 FT
As | 1.4 | 1.0 FT
Pb | 230 | 1.0 FT
Cd | 1.9 | 1.0 FT
As | 2.6 | 1.0 FT
As | 19 | 1.0 FT
As | 11 | 5.0 FT
Cd | 1.7 | 1.0 FT
As | 6.9 | 1.0 FT
Pb | 310 | 1.0 FT
IRONWORKS WELDING
1702 EAST 41ST ST.
VACANT LAND
AARON SPORTSWEAR
1820 EAST 41ST STREET



METAL	CONCENTRATION	DEPTH
Cr	30	1.0 FT

METAL	CONCENTRATION	DEPTH
Cr	17	5.0 FT

METAL	CONCENTRATION	DEPTH
Cr	18	1.0 FT
Cr	23	5.0 FT

METAL	CONCENTRATION	DEPTH
Cr	23	1.0 FT
Cr	17	5.0 FT
Cr	18	10.0 FT

METAL	CONCENTRATION	DEPTH
Cr	18	1.0 FT
Cr	22	5.0 FT

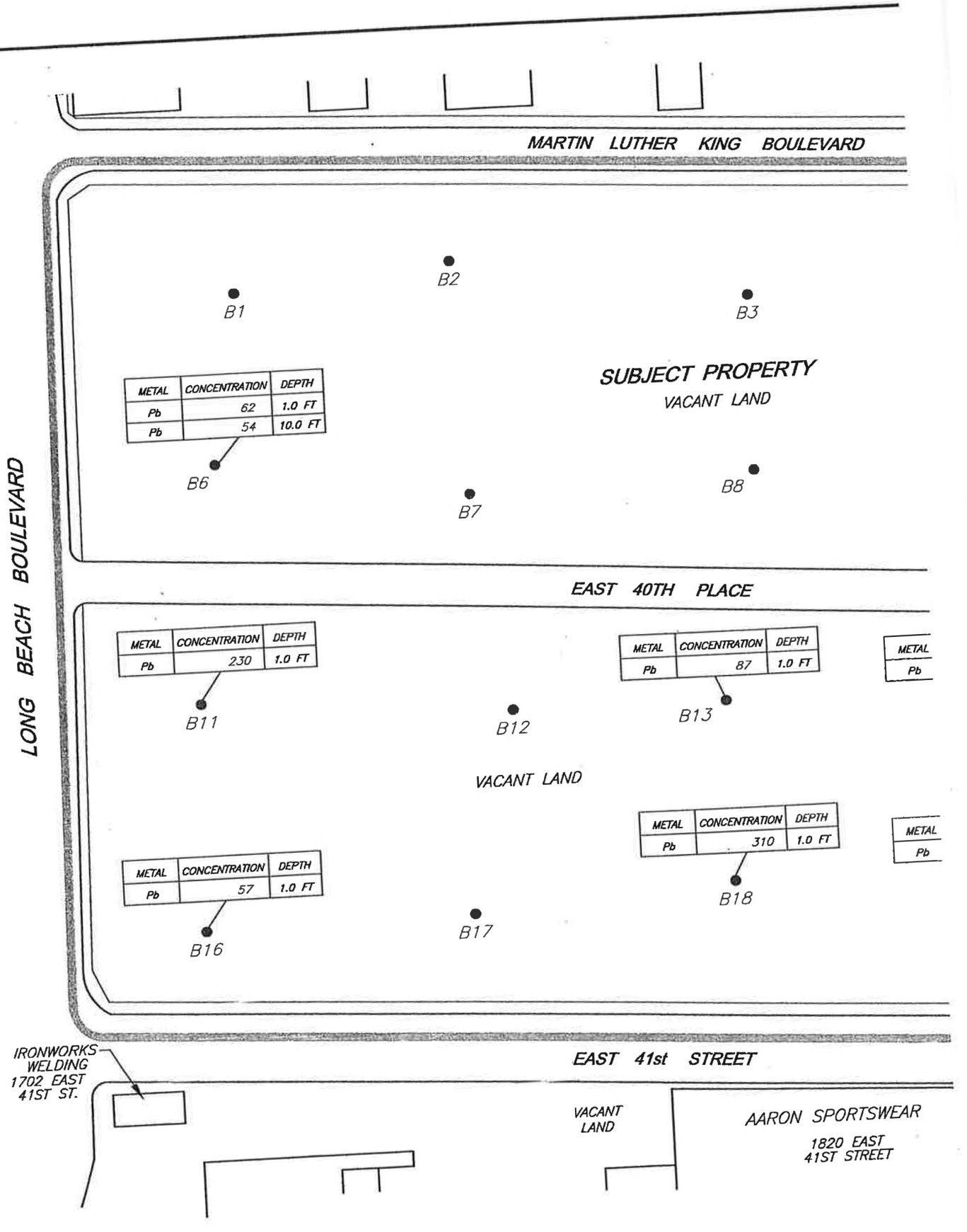
METAL	CONCENTRATION	DEPTH
Cr	18	1.0 FT
Cr	24	5.0 FT

METAL	CONCENTRATION	DEPTH
Cr	22	1.0 FT
Cr	26	5.0 FT
Cr	17	10.0 FT

METAL	CONCENTRATION	DEPTH
Cr	22	1.0 FT
Cr	18	5.0 FT

METAL
Cr

METAL
Cr


MARTIN LUTHER KING BOULEVARD
LONG BEACH BOULEVARD
EAST 40TH PLACE
EAST 41st STREET
B1
B2
B3
B6
B7
B8
B11
B12
B13
B16
B17
B18
SUBJECT PROPERTY
VACANT LAND
VACANT LAND
METAL | CONCENTRATION | DEPTH
Pb | 62 | 1.0 FT
Pb | 54 | 10.0 FT
METAL | CONCENTRATION | DEPTH
Pb | 230 | 1.0 FT
METAL | CONCENTRATION | DEPTH
Pb | 87 | 1.0 FT
METAL | CONCENTRATION | DEPTH
Pb | 57 | 1.0 FT
METAL | CONCENTRATION | DEPTH
Pb | 310 | 1.0 FT
IRONWORKS WELDING
1702 EAST 41ST ST.
VACANT LAND
AARON SPORTSWEAR
1820 EAST 41ST STREET

APPENDIX A - HEALTH AND SAFETY PLAN AND FIELD PROCEDURES

HEALTH AND SAFETY PLAN
KEN-1
Northeast corner of East 41st Street
and Long Beach Boulevard
Los Angeles, Los Angeles County,
California 90058

Prepared for

Mr. Larry Meyer
Alameda Holdings, LLC
%
Colliers International
5801 East Slauson Avenue, Suite 160
Commerce, California 90040

Prepared by

Professional Service Industries, Inc.
3960 Gilman St.
Long Beach, California 90815
(562) 597-3977

October 9, 2006
559-6G017

Prepared By: _____ Date: _____

Moises Delgadillo
Site Health and Safety Officer

Reviewed By: _____ Date: _____

Eric Fraske
Project Manager

CONTENTS

Long Beach, California 90815 i
PROJECT SUMMARY I
1.0 EMERGENCY REFERENCES 1
2.0 INTRODUCTION 3
3.0 SITE DESCRIPTION 5
4.0 SCOPE OF WORK 6
5.0 PROJECT PERSONNEL 7
5.1 PSI PROJECT MANAGER 8
5.2 PROJECT HEALTH AND SAFETY OFFICER 8
5.3 SITE HEALTH AND SAFETY OFFICER 9
5.4 FIELD PERSONNEL 10
6.0 HAZARD ANALYSIS 11
6.1 HEALTH AND SAFETY RISK ANALYSIS 11
6.2 CHEMICAL HAZARDS 11
6.3 FLAMMABILITY HAZARDS 11
6.4 HEAT STRESS/WEATHER CONDITIONS 13
6.4.1. Heat Stress Disorders 13
6.4.2. Control of Heat Stress 14
6.4.3 Heart Rate 15
6.4.4 Oral Temperature 15
6.5 NOISE HAZARDS 16
6.6 SOLAR RADIATION HAZARD 16
6.7 VIBRATIONS 16
6.8 BIOLOGICAL HAZARDS 17
6.8.1 Black Widow Spider 17
6.8.2 Hanta Virus 17
6.8.3 Snakes 18
6.8.4 Ticks 18
6.8.5 Fungi 18
6.8.6 Poison Ivy and Poison Oak 19
7.0 OVERVIEW OF GENERAL SAFE WORK PRACTICES 19
7.1 SITE CONTROL 20
7.2 SECURITY 21
8.0 EXPOSURE MONITORING PLAN 23
8.1 AREA AND PERSONAL MONITORING 23
8.2 ACTION LEVELS 23
9.0 PERSONAL PROTECTIVE EQUIPMENT (PPE) 25
9.1 RESPIRATORY PROTECTION 25

9.2 OTHER PROTECTIVE EQUIPMENT 26
10.0 PERSONNEL AND EQUIPMENT DECONTAMINATION 27
11.0 MEDICAL SURVEILLANCE/TRAINING REQUIREMENTS 28
12.0 EMERGENCY RESPONSE/ACCIDENT INVESTIGATION PROCEDURES 29
12.1 PLANNING 29
12.2 EMERGENCY SERVICES 29
12.3 GENERAL EVACUATION PROCEDURES 29
12.4 FIRST AID 30
12.5 PROTECTION FROM BLOOD-BORNE PATHOGENS 31
12.6 FIRE PROTECTION AND RESPONSE 31
12.7 GUIDELINES FOR EMERGENCY RESPONSE 31
12.8 GUIDELINES FOR A SPILL 32

FIGURES

FIGURE 1 HOSPITAL ROUTE MAP 2

TABLES

TABLE 1 HEALTH AND SAFETY RISK ANALYSES 11
TABLE 2 CHEMICAL HAZARDS 12
TABLE 3 SUGGESTED FREQUENCY OF PHYSIOLOGICAL MONITORING AND INITIAL WORK CYCLE 15
TABLE 4 DESIGNATED ACTION LEVEL CRITERIA 24

APPENDICES

APPENDIX ACALIBRATION AND MAINTENANCE OF THE FOXBORO 128
APPENDIX BCALIBRATION AND MAINTENANCE OF THE HNu PI 101-PID
APPENDIX C ON-SITE CALIBRATION AND AIR MONITORING DATA
APPENDIX D HEALTH AND SAFETY SIGN-OFF SHEET
APPENDIX EACCIDENT/INCIDENT INVESTIGATION REPORT

PROJECT SUMMARY

Site Description:
The subject property (Ken-1) project site is approximately 10 acres of vacant graded land. One paved road (East 40th Place) traverses the property east to west across the middle of the property. No structures are currently constructed on the site. The property was graded in 2006. Prior to 2006 the property was used as an agricultural farm from circa 1994 to 2006. From approximately 1928 to 1994 the subject property was used for various industrial and residential purposes. Former tenants of note include a former dry cleaning facility, a furniture company, a foundry, and an automotive service station.

PSI performed a Phase I ESA at the subject property in September of 2006. The Phase I ESA identified the following recognized environmental conditions at the subject property.

- Prior reports reviewed as part of this assessment revealed that subsurface soils at the subject property are contaminated with elevated levels of regulated metals, petroleum hydrocarbons, and volatile organic compounds. No specific source of contamination was identified in the prior assessments. Previous reports suggested that these concentrations are consistent with average urban background levels and also may be a result of past releases from the variety of industrial and commercial tenants that formerly occupied the subject property. The soil contamination documented at the subject property represents evidence of a recognized environmental condition in connection with the subject property.

- Various commercial and industrial tenants have occupied the subject property from 1928 to approximately 1994. These businesses include former dry cleaning facility, a furniture company, a foundry, and an automotive service station. Based on the inherent environmental risk associated with such businesses and the documented soil contamination at the subject property. The former presence of these businesses represents evidence of a recognized environmental condition.

Project Description:
The project scope of work includes advancing 20 soil borings, and the collection of soil samples.

Hazardous Materials Anticipated:
Hazards include contact with soils impacted by heavy metals. Physical hazards include noise, vibration, solar radiation, and heat stress. Biological hazards include poisonous animals and insects, viruses and fungi.

Other Health And Safety Hazards:
Vehicular and pedestrian traffic, underground and above- ground utilities, debris, and heavy equipment. The investigation will require Professional Service Industries (PSI) to periodically monitor volatile organic compounds using a flame ionization detector (FID) or a photoionization detector (PID). If the soil is found to contain flammable levels of

volatile hydrocarbons, the use of flame, arc, spark, or other sources of ignition will be strictly prohibited.

Air Monitoring Equipment:
Flame ionization detector (FID) calibrated with 10 and 100 ppm methane or photoionization detector (PID) calibrated to benzene using 100 parts per million (ppm) isobutylene. Dräger pump and colorimetric detector tubes specific for benzene.

Initial Personal Protection:
Assuming vapor levels below the adopted Action Levels, Level D of personal protective equipment (PPE) used when drilling and water sampling. Protective clothing disposed or washed after each workday and prior to next use.

Wind Direction Indicator:
A flag, barricade tape, or tree.

Hospital:
Community Hospital of Huntington Park
2623 East Slauson Avenue,
Huntington Park, CA 90255
323-277-5855

1.0 EMERGENCY REFERENCES

(to be posted on site)

AMBULANCE:		911
POLICE:		911
FIRE:		911
SPILL:		911
HOSPITAL:	Community Hospital of Huntington Park 2623 East Slauson Avenue, Huntington Park, CA 90255 323-277-5855	

DIRECTIONS TO HOSPITAL: From the site head east on E 41st Street continue onto E 38th street. Turn right and head south on Santa Fe Avenue. Turn left and head east on Slauson Avenue for 0.3 Mile.

CLIENT CONTACT: Ken Coward	1-323-726-1200
NATIONAL RESPONSE CENTER:	1-800-424-8802
POISON CONTROL CENTER:	1-800-682-9211
TOXLINE:	1-301-496-1131
CHEMTREC:	1-800-424-9300

EMERGENCY TELEPHONE NUMBERS:

PSI—LONG BEACH OFFICE	1-562-597-3977
PSI PROJECT MANAGER: Eric Fraske	1-562-597-3977 Ext. 209 Mobile 1-562-755-3639
SITE HEALTH & SAFETY: Moises Delgadillo	1-562-597-3977 Ext. 239 Mobile 1-562-577-5816
UNDERGROUND SERVICE ALERT:	1-800-422-4133

FIGURE 1

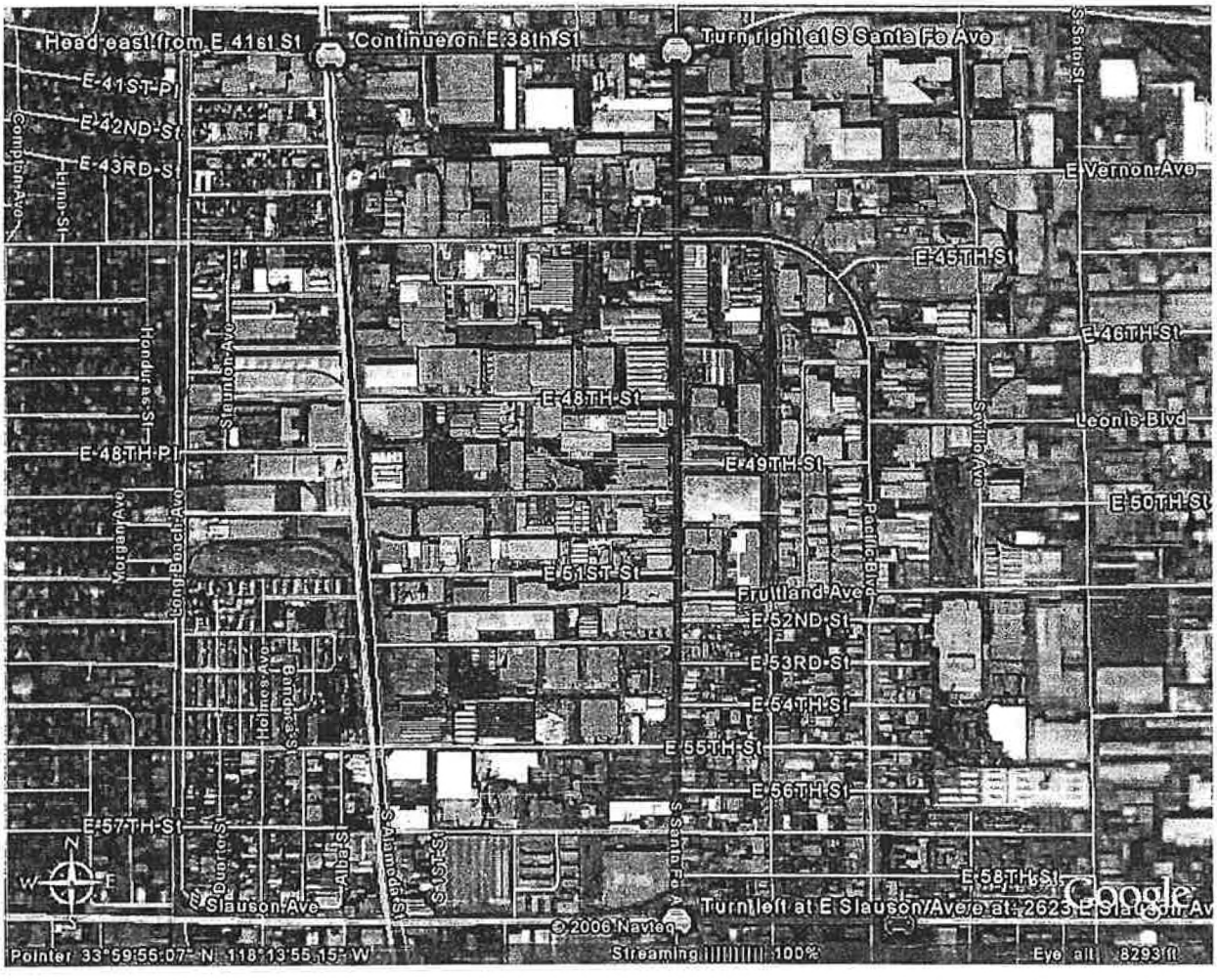
HOSPITAL ROUTE MAP

Name of Hospital: Community Hospital of Huntington Park

Telephone Number: 323-277-5855

Hospital Address: 2623 East Slauson Avenue

Huntington Park, California, 90255



2.0 INTRODUCTION

This site specific Health and Safety Plan (SHSP) has been developed by Professional Services Industries, Inc. (PSI), to establish the health and safety procedures required to minimize potential health risks to personnel of PSI and its subcontractors who will be involved in this project. The provisions of this SHSP directly apply to personnel of PSI and its subcontractors who may be exposed to occupational health and safety hazards related to the performance of the investigation described in the Work Plan to which this document is appended.

The procedures in this SHSP have been developed based upon current knowledge of specific chemical, physical an biological hazards that are known or anticipated in the operations to be conducted at the work site. This SHSP and all site activities will be in compliance with the following regulations and guidelines:

- United States Department of Labor, Occupational Safety and Health Administration (Fed/OSHA) Standards codified in the Title 29, Code of Federal Regulations (29 CFR), specifically:
  - 29 CFR 1926.65/1910.120 Hazardous Waste Operations and Emergency Response (HAZWOPER)
  - 29 CFR 1926.59 Hazard Communication
  - 29 CFR 1926Safety and Health Regulations for Construction
  - 29 CFR 1926.850-859 Construction Demolition Standards
  - 29 CFR 1910.1030 Bloodborne Pathogens
  - 29 CFR 1910 General Industry Standards
- California Occupational Safety and Health Administration (Cal/OSHA) Standards codified in Title 8, California Code of Regulations (8 CCR), specifically:
  - 8 CCR 5095-5100 Control of Occupational Noise
  - 8 CCR 5144 Respiratory Protection Equipment
  - 8 CCR 5155 Air Contaminants
  - 8 CCR 5156-5159 Confined Spaces
  - 8 CCR 5192 Hazardous Waste Operations and Emergency Response (HAZWOPER)
  - 8 CCR 5193 Bloodborne Pathogens
  - 8 CCR 5194 Hazard Communication
  - 8 CCR 5198 Lead
  - 8 CCR 5218 Benzene
  - 8 CCR 3200-6184 General Industry
  - 8 CCR 1500-1938 Construction Standards
- PSI Corporate Health and Safety Plan and Policies
- NIOSH/OSHA/USGC/USEPA, Occupational Safety and Health Guidance

Manual for Hazardous Waste Site Activities, October 1985

- ANSI, Practice for Respiratory Protection, Z88.2, 1992

It is PSI's policy that all activities covered by this SHSP shall be conducted in accordance with this SHSP and all applicable federal, state, and local health and safety codes and ordinances. PSI personnel and subcontractors covered by this SHSP who cannot, or will not, comply with these requirements will be excluded from project activities. All personnel of PSI and its subcontractors covered by this SHSP must read and sign the SHSP and return the SHSP sign-off sheet to the PSI Site Health and Safety Officer (SHSO) prior to the start of field operations.

3.0 SITE DESCRIPTION

The subject property is known as the Ken-1 Project Site, and it is located at the northeast corner of East 41st Street and Long Beach Boulevard in the City of Los Angeles, Los Angeles County, California. The property is bound by Long Beach Boulevard to the west; Martin Luther King Boulevard to the north; Alameda Street to the east; and East 41st Street to the South.

The property is located in a predominantly mixed commercial/light-industrial setting. Current usage of adjoining property includes: Martin Luther King Boulevard followed by Alpha Property Management and Solar Integrated Technologies to the north; Alameda Street followed by USI Floral Imports, Pacer Furniture, and 100.Candles.Com to the east; East 41st Street followed by the Los Angeles Regional Food Center, Ironworks Welding, and Aaron's Sportswear to the south; and Long Beach Boulevard followed by multi-family residential units and two industrial buildings with no identified tenant.

A current United States Geological Survey (USGS) 7.5 minute topographic map for the Los Angeles Quadrangle dated 1981 was reviewed as specified in ASTM Standard E 1527-00 § 7.2.3. According to the contour lines on the topographic map, the site is located approximately 208 feet above mean sea level. The topography in the immediate site area is relatively flat with a general slope to the north. The Los Angeles River is located approximately 1 mile east-northeast of the Subject Property. The property does appear on the map as developed with two large rectangular buildings located on the northern half of the Subject Property.

4.0 SCOPE OF WORK

The purpose of this assessment is to verify the presence of the recognized environmental conditions in soil identified in the Phase I ESA and, if present, to preliminarily assess the magnitude and extent of those contaminants identified. The results of this study will be used to provide a preliminary, gross estimate of costs associated with mitigating the identified soil contamination as it relates to future construction and land use of the property.

Twenty borings will be advanced along the project area and samples will be collected and analyzed.

5.0 PROJECT PERSONNEL

PSI Project Manager: ..... Eric Fraske

Project Health and Safety Officer: ..... Nick Norocea, PE

Site Health and Safety Officer: ..... Moises Delgadillo

Fieldwork Subcontractors: .....Jet Drilling

The responsibilities of these personnel are described in the following paragraphs. The implementation of health and safety procedures at this site and/or facility will be an integrated effort among the PSI Project Manager (PM), PSI Project Health and Safety Officer (PHSO), the appointed Site Health and Safety Officer (SHSO), PSI Field Personnel (FP), and any subcontractor(s).

5.1 PSI PROJECT MANAGER

The PSI PM is, by designation, the individual who has the primary responsibility for assuring the health and safety of personnel involved throughout the duration of this project. The PM, therefore, has the primary responsibility for implementing this SHSP. PM's primary responsibilities include the following:

- Assuring that all project personnel have received and read a copy of this SHSP and have completed the SHSP sign-off sheet.
- Assuring that all personnel have attended a briefing apprising them of the contents of the SHSP and specific hazards identified at the site/facility prior to performing work.
- Assuring the availability and usage of proper PPE during the project, as required by this SHSP.
- Assuring that all subcontractor personnel submit documentation of employee participation in a medical surveillance program and training program according to the requirements of 29 CFR 1926.65/1910.120 and 8 CCR 5192.
- Maintaining a high level of safety and health consciousness among employees at the site/facility.
- Insuring employee compliance with and adherence to the SHSP health and safety requirements during the performance of their work at the site.
- Preparing accident/incident investigations with the assistance of the SHSO and the PHSO.
- Maintaining regular communications with the SHSO and, if necessary, resolving safety and health conflicts with PHSO.

5.2 PROJECT HEALTH AND SAFETY OFFICER

The PHSO is the individual responsible for the implementation and development of PSI's safety and health policies. The PHSO prepares and approves all SHSPs before presentation to regulatory agencies or field implementation. The SHSO or other appointee consults with the PHSO on PSI policy and specific site characteristics during development of all SHSPs.

The PHSO is the individual responsible for the preparation, interpretation, and modification of this SHSP. Modifications to this SHSP that may result in less stringent precautions cannot be undertaken by the PM or the SHSO without the approval of the PHSO. Specific duties of the PHSO include the following:

- Advising the PM and SHSO on matters relating to safety and health on this project.
- Recommending appropriate PPE and air monitoring instrumentation to protect personnel from potential hazards.
- Performing field audits, when necessary, to monitor the effectiveness of this SHSP and to assure compliance with this SHSP.
- Performing or directing the performance of personal exposure monitoring where required and where deemed necessary to determine the adequacy of protective measures and PPE specified by this SHSP.
- Maintaining contact with the PM to regularly evaluate project conditions and new information that might require modifications to the SHSP.
- Working with the PM to assure that the appropriate PPE is used at the location.
- Conducting briefing meetings, when necessary, to apprise personnel of the contents of this SHSP and the project hazards.
- Assisting with the preparation of accident/incident report(s) as needed.
- Procuring appropriate air monitoring instruments as required and providing guidance on air monitoring.

5.3 SITE HEALTH AND SAFETY OFFICER

The appointed SHSO will be a member of the PSI project field team and has undergone HAZWOER training as required under 29 CFR 1926.65(e)/1910.120(e) and 8 CCR 5192(e). The SHSO is responsible for enforcing the requirements of this HASP once work begins. By design, the SHSO has the authority to immediately correct all situations where noncompliance with this SHSP is noted and to immediately stop work in cases where an immediate danger is perceived. Some of the SHSO's specific responsibilities include:

- Procuring and distributing the PPE needed for this project.
- Maintaining and calibrating air monitoring instruments as required and performing air monitoring.

- Verifying that all PPE and safety and health equipment is in good working order.
- Setting up and maintaining the personnel decontamination facility and supervising the decontamination procedure, if necessary.
- Notifying the PM and the PHSO of imminent danger situations and gross noncompliance of personnel with health and safety procedures.
- Keeping track of weather conditions and wind direction to the extent that they could affect potential exposure.
- Supervising and monitoring the safety performance of all personnel to assure that required health and safety procedures are followed, and correcting any deficiencies.
- Reporting all accidents/incidents to the PM and assisting the PM and PHSO in accident/incident reports.
- Initiating emergency response procedures (Section 12.0).

5.4 FIELD PERSONNEL

All PSI and subcontractor field personnel (FP) are responsible for following the health and safety procedures specified in this SHSP and for performing their work in a safe and responsible manner. Responsibilities of the FP include the following:

- Reading and understanding the SHSP in its entirety prior to the start of fieldwork.
- Complying with all the health and safety practices and procedures described in this SHSP.
- Using appropriate PPE and respiratory protection devices as described in this SHSP and as instructed by the SHSO.
- Signing the SHSP sign-off sheet acknowledging receipt and understanding of this SHSP (see Appendix D) and returning the sheet to the SHSO.
- Bringing forth any questions or concerns regarding the content of the SHSP to the SHSO prior to the start of work.
- Reporting all accidents and incidents to the SHSO.
- Complying with the requests of the appointed SHSO.

6.0 HAZARD ANALYSIS

6.1 HEALTH AND SAFETY RISK ANALYSIS

The nature of the tasks that will take place during this project present the potential for site workers exposure to a number of chemical, biological and physical hazards. A summary of the hazards associated with each of the tasks is presented and appropriate level of protection indicated in Table 1.

TABLE 1
HEALTH AND SAFETY RISK ANALYSIS

Location	Tasks	Hazards	Initial Level of Protection
Project Site	Drilling and sampling	Potential noise and vibration hazards due to drilling and/or saw cutting. Potential toxic vapors inhalation hazard due to excavation of soil that may contain chlorinated solvents. Potential bioaerosol inhalation hazard related to soil agitation and excavation, and vegetation.	Level D which can be upgraded to Level C or B after air monitoring results indicate levels of air contaminants exceeding the adopted Action Levels and/or OSHA PELs. Hearing protection will also be required during drilling and/or saw cutting.

6.2 CHEMICAL HAZARDS

Chlorinated solvents and heavy metals associated with historic site operations. Physical and chemical properties, routes of exposure, target organs, adverse health effects, carcinogenicity, and exposure limits of these prominent chemical hazards that may be encountered during operations at the subject site are summarized in Table 2. It is important to note that this is not an exhaustive list of chemical hazards and other chemical hazards may be present on the site.

6.3 FLAMMABILITY HAZARDS

PSI and subcontractors will recognize specific work practices in the event of flammable conditions. As a precautionary measure, all electrical equipment used during the project shall be intrinsically safe (approved for use in Class 1, Division 1, Group D atmospheres) or explosion proof. In addition, all tools and equipment used within the work area shall be spark-resistant to avoid creating an ignition source.

TABLE 2
CHEMICAL HAZARDS

Mixture/Chemical	Physical and Chemical Properties	Routes of Exposure	Target Organs	Symptoms
Tetrachloroethene	Colorless liquid with a mild, chloroform-like odor.	inhalation, skin absorption, ingestion, skin and/or eye contact	[in animals: liver tumors]	Irritation eyes, skin, nose, throat, respiratory system; nausea; flush face neck; dizziness, incoordination; headache, drowsiness; skin erythema (skin redness); liver damage; [potenti occupational carcinogen]
Chromium	Blue-white to steel-gray, lustrous, brittle, hard, odorless solid.	inhalation, ingestion, skin and/or eye contact	Eyes, skin, respiratory system	Irritation eyes, skin; lung fibrosis (histologic)
Nickel	Metal: Lustrous, silvery, odorless solid.	inhalation, ingestion, skin and/or eye contact	Nasal cavities, lungs, skin	Sensitization dermatitis, allergic asthr pneumonitis; [potential occupational carcinogen]
Copper	Reddish, lustrous, malleable, odorless solid.	inhalation, ingestion, skin and/or eye contact	Eyes, skin, respiratory system, liver, kidneys (increase(d) risk with Wilson's disease)	Irritation eyes, respiratory system; cou dyspnea (breathing difficulty), wheezi [potential occupational carcinogen]
Gasoline	Clear liquid with a characteristic odor.	inhalation, skin absorption, ingestion, skin and/or eye contact	Eyes, skin, respiratory system, central nervous system, liver, kidneys [in animals: liver & kidney cancer]	Irritation eyes, skin, mucous membrar dermatitis; headache, lassitude (weakness, exhaustion), blurred visio dizziness, slurred speech, confusion, convulsions; chemical pneumonitis (aspiration liquid); possible liver, kidn damage; [potential occupational carcinogen].

NOTES: NR = Not Reported
TLV-TWA = Threshold Limit Value/ 8 hours Time-Weighted Average
ppm = parts per million

6.4 HEAT STRESS/WEATHER CONDITIONS

The climate at the site is characterized by summers with frequent warm days, and cool winters. High/low temperatures are as follows:

	January	July
Mean high (°F)	65	85
Mean low (°F)	52	63

6.4.1. Heat Stress Disorders

Given the ambient temperatures in California, workers wearing protective clothing may experience varying degrees of heat stress if precautions are not taken. All project participants will be trained to recognize the following forms of heat stress and associated symptoms:

- Heat Rash, also known as prickly heat, may occur in hot and humid environments where sweat is not easily removed from the service of the skin by evaporation. When extensive or complicated by infection, heat rash can be so uncomfortable that it inhibits sleep and impede workers performance or even results in temporary total disability. Resting in cool place and allowing the skin to dry can prevent it.

- Heat Cramps, painful spasms of the muscles, are caused when workers drink large quantities of water but fail to replace their bodies' salt loss. Tired skeletal muscles, those used for performing work, are usually the ones most susceptible to cramps. Cramps may occur during or after work hours and may be relieved by taking mineralized liquids orally or saline solution intravenously for quicker relief if medically determined to be required. Light stretching of muscles can ameliorate this condition after replenishing fluids and minerals.

- Heat Exhaustion results from loss of fluids through sweating when workers fail to drink enough fluids or take in enough salt or both. Workers with heat exhaustion still sweat but experience extreme weakness or fatigue, nausea and headaches. The skin is clammy and moist, the complexion pale or flushed, and the core body temperature slightly higher than normal. Treatment is usually simple: the affected worker should rest in a cool place and drink an electrolyte solution (a beverage used by athletes to restore potassium, calcium and magnesium salts). Severe cases involving workers who vomit or lose consciousness may require longer treatment under medical supervision.

- Heat Stroke, the most serious health problem for workers in hot environments, is caused by the failure of the body's internal mechanism to keep core body temperature near normal. Sweating stops and the body can no longer cool itself and dissipate the internally generated heat through the skin by sweating. Signs include

mental confusion, delirium, loss of consciousness, convulsion or coma; a core body temperature of 106°F or higher; and hot dry skin which may be red or bluish. Victims of heat stroke will die unless treated promptly. While awaiting medical help, the victim must be removed to a cool area and his or her clothing soaked with cool water. He or she should be fanned vigorously to increase cooling. Prompt first aid can prevent permanent injury to the brain and other vital organs.

6.4.2. Control of Heat Stress

Heat-related health problems can be prevented or the risk of developing them reduced by following a few basic control measures:

1. If possible, use mechanical ventilation, air-conditioning or fans on the site.
2. Work practices such as providing plenty of drinking water and first aid training.
3. Acclimatization of workers to the heat through short exposures followed by longer periods of work in the hot environment can reduce heat stress.
4. Employee education is vital so that workers are aware of the need to replace fluids and salt loss through sweat, and recognition of heat stress symptoms.
5. Alternating work-rest periods where workers will commence with the work cycle and physiological monitoring when ambient temperatures in the work area are above 72°F (Table 3). To monitor the worker and adjust his/her work cycle, heart rate or oral temperature will be taken and adjustments made accordingly.

TABLE 3
SUGGESTED FREQUENCY OF PHYSIOLOGICAL MONITORING AND INITIAL WORK CYCLE FOR FIT AND ACCLIMATIZED WORKERS

ADJUSTED AMBIENT TEMPERATURE[a]	LEVEL D PROTECTION WITH NORMAL WORK ENSAMBLE[b]	LEVEL C PROTECTION WITH IMPERMEABLE ENSAMBLE
90 or above	45-minute cycles	15-minute cycles
87.5 - 90	60-minute cycles	30-minute cycles
82.5 - 87.5	90-minute cycles	60-minute cycles
77.5 - 82.5	120-minute cycles	90-minute cycles
72.5 - 77.5	150-minute cycles	120-minute cycles

[a]°F = ambient air temperature shielded from radiant heat + (13 x % sunshine).
[b]A normal work ensample consists of cotton coveralls or other cotton with long sleeves and pants
15-minute rest regimes between cycles.

For Levels C and D of PPE, physiological monitoring, including heart rate and/or oral temperature, will begin after the commencement of work and after ambient temperatures exceed 72°F according to Table 3. For example, if the adjusted ambient temperature is 78°F at 8 am, and workers are working in Level C, they will work for 90 minutes (1 ½ hours) on site, take a 15 minutes break at 9:30 am and choose to have Gatorade™ or other electrolytic drink.

6.4.3 Heart Rate

Count the radial pulse during a 30-second period as early as possible in the rest period. If the heart rate exceeds 110 beats a minute at the beginning of the rest period (rest periods coincide with monitoring frequencies), shorten the next work cycle by one-third and keep the rest period the same. If the heart rate still exceeds 110 beats per minute at the next test period, shorten the following work cycle by one-third.

6.4.4 Oral Temperature

Use a clinical thermometer (3 minutes under the tongue) to measure oral temperature at the end of the work period (before drinking). If the oral temperature exceeds 99.6°F (37.6°C), shorten the next work cycle by one-third without changing the rest period. If the temperature still exceeds 99.6°F at the beginning of the next rest period, shorten the following work cycle by one-third. Do not permit a worker to wear semi-permeable or impermeable clothing when oral temperature exceeds 100.6°F (38.1°C).

6.5 NOISE HAZARDS

Past experience has shown that the use of Drill Rigs for investigations may generate noise levels at or above the Cal/OSHA Action Level of 85 dBA (decibels measured on A-weighted scale) measured within the worker's hearing zone. The SHSO will monitor equipment operators exposure to noise using a noise dosimeter, if warranted, to quantify total noise dose throughout the day measured within the operator's hearing zone. If noise exposure measurements indicate an 8-hour time-weighted average (TWA) level in excess of the Action Level of 85 dBA, hearing protection in the form of earplugs, earmuffs, or a combination will be used. Earplugs have been assigned noise reduction ratings (NRR) by the Environmental Protection Agency (EPA) of up to 35 dBA depending on NRR for the particular earplug. This NRR makes the use of earplugs sufficient to attenuate the 8-hours TWA noise exposure levels of 120 dBA. Combination earplugs and earmuffs will be used if the 8-hours TWA levels exceed 120 dBA or if the impulse/impact noise C-weighted peak exceeds 140 dB. All PSI employees and subcontractors must wear hearing protection if their 8-hours time weighted average exposure exceed the OSHA PEL of 90 dBA or if impulse/impact noise C-weighted peak exceeds 140 dB. Hearing protection must attenuate employee exposure to the PEL of 90 dBA or lower as required by 8 CCR 5096 (b) and 29 CFR 1910.95. In the absence of noise dosimetery evaluation for the subject site and if normal conversion is impeded by continuous or impact noise, personnel of PSI and its subcontractors will use their judgement and wear the appropriate hearing protection as described below.

6.6 SOLAR RADIATION HAZARD

One of the major sources of occupational exposure to ultraviolet (UV) radiation is the sun. The eyes and skin are the target organs of UV radiation. Excessive exposure of the eyes can cause corneal injuries and cataracts, while excessive exposure of the skin can cause sunburn, photokeratitis and skin cancer. The American Conference of Governmental Industrial Hygienists (ACGIH) has established UV radiation exposure threshold limit value (TLV). Conditioned, dark skinned or tanned individuals can tolerate skin exposure to UV radiation in excess of the TLV without experiencing the sunburn effects. However, such conditioning may not protect excessively exposed persons from skin cancer. Therefore, personnel of PSI and its subcontractors will be required to use appropriate eye and skin protection to safeguard their health against the harmful effects of UV radiation. Control measures include the covering of exposed skin as much as possible, applying sunscreen lotions to exposed skin and the use of UV radiation filtering glasses during the daily UV radiation peak levels of mid-morning to mid-afternoon.

6.7 VIBRATIONS

Hand-Arm or Segmental vibrations can result from the use of hand-held mechanical equipment, such as pneumatic tools, and can cause blanching and numbness of the

fingers which can progress to Vibration-induced White Fingers, also known as Raynaud's Syndrome. The effects of Whole-Body Vibrations on the body are complex and affect the internal organs of exposed individuals differently sometime causing kidney, liver, heart and CNS problems. Because of the likelihood of Hand-Arm or Segmental vibration hazards, PSI and its subcontractors are required to take frequent breaks or preferably wear vibration-dampening gloves during the operation of vibrating equipment. Furthermore, for the operation of heavy construction equipment, known to generate Whole-Body Vibration, PSI and subcontractors are required to maintain this equipment to eliminate excessive engine vibration, and operators to take frequent breaks.

6.8 BIOLOGICAL HAZARDS

6.8.1 Black Widow Spider

The black widow spider *Latrodectus hespersus* specie is commonly found in the western United States and American deserts, and can be present in monitoring well casings and other dark areas at the subject site. The bite symptoms are characterized by sharp pinprick-like bite followed by a dull, numbing pain in the affected extremity, and pain and cramps of the large skeletal muscle. Involuntary contractions or twitching of muscles can frequently be seen within 30 minutes of the bite. Sweating is common, and the person may complain of weakness and pain in the regional lymph nodes. Pain in the lower back, thighs, or lower or abdomen is a common complaint and the rigidity of the abdominal muscles is seen in most severe cases. There is no effective first-aid treatment for black widow venom and the victim should be placed under the cared of a physician. To control the black widow, carefully remove all materials where they might hide. They can be cleaned of an area simply by knocking down webs, spiders, and round tan egg sacks with a stick and crushing them underfoot.

6.8.2 Hanta Virus

An outbreak of a fatal respiratory illness took place on an Indian Reservation in the Four Corners area (the border of Utah, New Mexico, Colorado and Arizona) in 1993. Epidemiologists at the Center of Disease Control and Prevention discovered that the causative agent of this illness was the Hanta virus. Hanta virus has been since reported in every western state, and in many eastern states. The common deer mouse is the main host, but the virus is also found in pinion mice, brush mice, and western chipmunks. Humans are thought to become infected when they are exposed to contaminated dust from nests or droppings of mice. The symptoms of Hantavirus infection include fever, muscle aches, headache, cough, and progress rapidly to severe lung disease, often requiring intensive-care treatment. Personnel of PSI and its subcontractors should seek medical attention if they suspect exposure to Hanta virus contaminated mice droppings and experience symptoms of this disease. Control measures include airing spaces opened for the first time for thirty minutes, spray disinfectant, and spray mouse nests and droppings with 10% chlorine solution/bleach.

6.8.3 Snakes

The Western diamondback rattlesnake, *Crotalus atrox* is the predominant snake in the Southern California. The Western diamondback rattlesnake venom is a complex mixture of proteins, chiefly proteolytic enzymes. In general, rattlesnake venom attacks the cardiovascular system causing blood vessel destruction, platelet dysfunction and hemorrhage blood and vessels producing changes in the blood cells and blood coagulation mechanisms. Personnel of PSI and its subcontractors will seek immediate medical attention when bitten by the Western diamondback rattlesnakes.

6.8.4 Ticks

Ticks are vectors of many diseases and infections. Lyme disease is caused by the bacteria, *Borrelia Borgdurferi*, transmitted by the bite of the western black-legged deer tick, *Ixodes pacificus*. It is endemic in the Pacific Coast states particularly northern California. Symptoms and signs of the early disease stage include fatigue, chills and fever, headaches, muscle and joint pain, swollen lymph nodes and skin rash which can progress to anorexia, lethargy, muscle weakness, joint inflammation, eyelid drooping, and facial paralysis, and other nervous system abnormalities. Control measures include removing leaves, brush and tall grass; wear light colored clothing where ticks can be spotted easily; walk on clear paths and avoid brushes and high grass areas; spray insect repellant on clothes; and use PPE effectively. Personnel of PSI and its subcontractors will seek immediate medical attention when bitten by the deer tick *Ixodes pacificus.*

6.8.5 Fungi

Toxic fungi can be found dormant in soils or can grow on a variety of vegetation, which can become airborne and upon inhalation by humans can cause respiratory and other infections. Inhalation of *Blastomyces dermatitidis* fungus found everywhere in North America and originating from colonies growing in soil causes blastomycosis, pulmonary infection, in humans and some animals. Similarly, inhalation of *Coccidioides immitis* fungus, endemic to desert regions of North America, causes coccidioidomycocis, a highly infectious disease, in humans and animals. Furthermore, inhalation of the fungus species *Aspergillus fumigatus*, *Aspergillus flavus*, and *Aspergillus niger* causes *aspergillosis*, a respiratory infection in humans and animals. The *Aspergillus* species are ubiquitous in outdoor and indoor environments worldwide and can grow on fermenting compost piles, damp hay, decaying vegetation, and cereal grains. Animal and bird dropping often contain fungi and bacteria that can cause respiratory infections when inhaled. Control measures and prevention of infections caused by these fungi include constant wetting agitated soils and avoiding the disturbance of moldy hay and composted vegetation, avoidance of disturbing animal and bird droppings, and the use of PPE and respiratory protection. Good hygiene practices, such as washing with soap and water, will help reduce the risks of exposure.

6.8.6 Poison Ivy and Poison Oak

Poison ivy and poison oak are two toxic plants that can be encountered whenever there are vegetation and trees anywhere in the continental United States. They produce a resinous material that can cause severe skin irritation and rash depending on the degree of skin contact and the amount of resin that the exposed skin receives. To prevent direct contact and the resulting dermatitis, PSI and subcontractors must recognize the presence of the two plants, protect exposed skin with PPE and avoid direct contact with these two plants. Cleaning the exposed skin thoroughly with soap and water after contact will reduce the risks of severe dermatitis.

7.0 OVERVIEW OF GENERAL SAFE WORK PRACTICES

All site participants will be trained on the contents of this SHSP. The following measures are designed to augment the specific health and safety guidelines provided in this plan:

- Under no circumstances may PSI personnel nor its subcontractor(s) enter any confined spaces without approval by the SHSO and issuance of a confined-space entry permit.

- Avoidance of unwarranted contact with chemicals or chemical products is of the utmost importance. Whenever possible, avoid contact with chemically impacted (or potentially chemically impacted) surfaces or materials. Walk around (not through) puddles and discolored surfaces. Avoid sitting, kneeling, or resting equipment on chemically impacted surfaces.

- PSI personnel and subcontractors must use the appropriate PPE as described in this SHSP and as dictated by site activities.

- Eating, drinking, chewing gum or tobacco, smoking, or any practice that increases the probability of hand-to-mouth transfer of toxic materials is prohibited in the exclusion zone and contamination reduction zone.

- PSI personnel and subcontractors must use the appropriate decontamination procedure prior to leaving the site whenever appropriate.

- Hands and face must be thoroughly washed upon leaving the exclusion zone and before eating, drinking, or any other activities.

- Beards and other facial hair that interfere with respirator fit are prohibited for those individuals who may be required to use respiratory protection.

- The use of alcohol or illegal drugs is prohibited during field operations. Personnel deemed mentally or physically impaired by alcohol or any illegal drug(s) will be prohibited from participating in field operations by the SHSO. Medicine and alcohol can exacerbate and enhance the effects of exposure to potentially toxic chemicals. If an individual is taking prescription drugs, he or she should contact PSI's occupational doctor at Memorial Occupational Medical Services (telephone 310-433-0085) to determine whether or not there is a contraindication. If there is a contraindication of drug use and exposure to chemicals, the individual should not be allowed to work at the site while taking the prescribed medication.

- No sparks or open flames will be permitted during site operations if there is a high potential for flammability hazards.

- Safety equipment described in this SHSP will be required for all field personnel unless otherwise approved by PSI PHSO.

- Unauthorized personnel shall remain outside the exclusion zone at all times.

- All site participants will be informed by the SHSO of mechanical hazards caused by the operation of equipment and machinery including falling objects, trips, slips and falling hazards; and electrical hazards caused by faulty wiring and disrupted overhead electrical lines on the site.

7.1 SITE CONTROL

Only authorized personnel will be allowed to enter the exclusion zone. This zone includes the identified and suspected areas of significant contamination and is recognized as having the highest inhalation exposure potential and/or presents a high probability of skin contact with skin absorbed and/or skin irritating chemicals. All personnel entering the exclusion zone will be required to sign the Health and Safety sign-in sheet prior to entry. Due to the hazards associated with working around heavy equipment that may be used during the field program, the exclusion zone will be defined based upon the degree of contamination and can extend for a maximum radius of 15 feet for this and similar type and size project. The exclusion zone may be reduced if physical conditions or degree of chemical contamination permit smaller exclusion zones. The exclusion zone will be identified with barricades and caution tape. All PSI personnel and subcontractors will be required to wear appropriate PPE in the exclusion zone (see Section 9.0). PSI and subcontractors are not allowed to open any devices that could result in potential harmful exposure to petroleum hydrocarbons unless PSI is periodically monitoring the area with a PID or equivalent.

Most activities in contaminated or otherwise hazardous areas will be conducted with a buddy who is able to:

- Provide his or her partner with assistance,
- Observe his or her partner for signs of chemical exposure or heat stress, and
- Periodically check the integrity of his or her partner's protective clothing.

The "buddy system" will be used by all personnel in the exclusion zone. The "buddy system" may also be necessary during decontamination procedures described in Section 10.0.

The "buddy system" alone may not be sufficient to ensure that help will be provided in an emergency. At all times, PSI and subcontractors in the exclusion zone should be in line-of-sight contact or communications contact with the SHSO or backup person.

Hand signals shall be employed by field operations personnel to communicate emergency information if the individual's voice is overcome by noise from equipment operations. The hand signals will be taught to all field personnel before commencement of field operations and shall be reviewed during the daily on-site safety briefings. In addition, the "buddy system" shall be employed during field activities so that communication does not deteriorate. The following hand signals will be used when operating heavy equipment:

Signal	Meaning
Hand grabbing throat	Out of air, cannot breathe.
Grip the partner's wrist	Leave area immediately, no debate.
Hands on top of head	Need assistance.
Thumbs up	OK, I am all right, I understand.
Thumbs down	No, negative.

7.2 SECURITY

Site security is necessary to:

- Prevent the exposure of unauthorized, unprotected people to site hazards,
- Avoid the increased hazards from vandals or persons seeking to abandon other wastes on the site,
- Prevent theft, and
- Avoid interference with safe working procedures.

To maintain site security during working hours, PSI will conduct the following tasks:

- Erect barricades around the perimeter of the exclusion zones, and

- Periodically monitor the perimeter for spectators and explain to them that "we are performing a subsurface investigation." No other reference to the site is necessary unless approved by the PM.

To maintain site security during off-duty hours, PSI will conduct the following tasks:

- Secure the area with existing fence, if possible; if not, remove all equipment and other potential physical hazards each workday; and

- Secure all drums, and/or temporarily store soil stockpiles on and cover with plastic sheeting.

Site activities will be limited to only authorized personnel. During site hours, all visitors will be required to sign the SHSP sign-off sheet to document their presence and the nature of their business (Appendix D).

8.0 EXPOSURE MONITORING PLAN

8.1 AREA AND PERSONAL MONITORING

Air monitoring will be performed to quantify flammable airborne vapor concentrations on the site to determine worker safety in general and define the level of worker protection in particular.

The following instruments may be available on the subject site:

- FID--Foxboro 128 Organic Vapor Analyzer
- PID--HNu PI 101, and
- Dräger Detector Pump and Tubes for Benzene 0.5-10 ppm

Air monitoring shall be conducted with a FID or PID during all site activities. Calibration and maintenance of the FID and PID is described in Appendix A and Appendix B respectively. The intent of air monitoring is to use field instruments and adopted Action Levels to assess the continuous exposure of on-site personnel to volatile organic compounds of concern during the investigation and to assess the need to upgrade or downgrade PPE in accordance with the monitoring results. Perimeter air monitoring will be conducted before project activities begin. Perimeter monitoring shall be conducted upwind and downwind to establish the average background concentrations. Air monitoring results for the perimeter shall be compared with the adopted Action Levels established in Section 8.2. If vapor concentrations are above 10 ppm and less than 20 ppm for 5 minutes in the breathing zone level, a half-face respirator shall be used. PID or FID readings shall be conducted every 15 to 30 minutes thereafter while PSI personnel or subcontractors are performing on-site operations. If concentrations from two subsequent monitoring events drop significantly below 10 ppm for 5 minutes and remain low, PSI personnel and subcontractors may remove their half-face respirators. If subsequent instrument readings show elevation of vapor levels to and above the 10 ppm, respiratory protection must be used again.

8.2 ACTION LEVELS

As a guide for daily monitoring, the following Action Levels have been adopted and could change due to specific site conditions. If the concentrations of VOCs measured by direct-reading equipment exceed the concentrations indicated in Table 4, work shall cease until vapor dissipates and appropriate PPE and respiratory protection is donned.

TABLE 4
DESIGNATED ACTION LEVEL CRITERIA

Contaminant	Action Level (ppm)	Required PPE
Constituents of Concern	10 20 200	Half-face respirator Full-face respirator Self-contained breathing apparatus (see Section 9.1)

9.0 PERSONAL PROTECTIVE EQUIPMENT (PPE)

Personal protective equipment selection shall be based on an evaluation of PPE performance characteristics relative to the potential physical, biological and chemical hazards, along with requirements and limitations of the site. The selection of level of protection and PPE for personnel of PSI and its subcontractors is dictated by the probability of encountering these potential hazards.

9.1 RESPIRATORY PROTECTION

Respiratory protection is governed by OSHA Standard 29 CFR 1926.103/1910.134-Respiratory Protection, and Cal/OSHA Standard 8 CCR 5144-Respiratory Protection Equipment. PSI and its subcontractors shall comply with requirements under these standards that are pertinent to the use of respiratory protection devices on this and similar sites.

Site personnel are not required to begin site activities with a half-face or full-face air-purifying respirator when drilling. However, they will be required when (1) opening caps or valves connected to the storage of petroleum product, (2) opening caps of monitoring wells, or (3) exceedance of adopted Action Levels require an air-purifying respirator. If two consecutive total hydrocarbon air concentrations measured 15-30 minutes apart are below 10 ppm, PSI personnel and subcontractors may remove their respirators. When PID or FID measurements indicate total hydrocarbon air concentrations in excess of 10 ppm and less than 20 ppm for 5 minutes, a half-face air-purifying respirator must be used by site personnel.

National Institute of Safety and Health (NIOSH) approved respiratory protection devices (North, MSA or equivalent) in the form of half-face or full-face air-purifying respirators equipped with organic vapor cartridges or organic-vapor, acid-gas and high-efficiency particulate air (HEPA) combination cartridges-P100 filter. This combination air-purifying element is designed to protect workers against gasoline vapors including benzene, toluene, ethylbenzene, and xylenes, as well as chlorine, metals, ketones and chlorinated hydrocarbons, asbestos and radionuclides. All site workers shall be required to show qualitative or quantitative fit-test documentation for the respirator they are using. Use of proper procedures shall be required for positive/negative pressure checks during donning, storage in a plastic bag to assure a clean facepiece-to-face seal, and proper respirator inspection.

If direct-reading instruments indicate concentrations in breathing-zone air in the 20-200 ppm range for 5 minutes, full-face air-purifying respirators shall be required. If readings exceed 200 ppm for 5 minutes, supplied-air respiratory protection devices shall be required. Respiratory protection should also be maintained if odors become objectionable at any time or if respiratory irritation becomes noticeable.

In some instances and depending on weather conditions and wind direction, it may be

possible to control personnel exposure to organic vapors by positioning workers upwind from vapor emission sources.

9.2 OTHER PROTECTIVE EQUIPMENT

Level D is defined in 29 CFR 1926.65/1910.120 and 8 CCR 5192 as a work uniform affording minimal protection that is only used for nuisance contamination. The following PPE identify Level D protection and will be required to be worn in the exclusion zone:

- Cotton or Tyvek coveralls,
- Work gloves,
- Steel toed work boots,
- Safety glasses with side shields or goggles,
- Fluorescent vests, and
- Hard hats.

Level C PPE is described in 29 CFR 1926.65/1910.120 and 8 CCR 5192. As defined in these Standards, Level C is used when (1) the atmospheric contaminants, liquid splashes, or other direct contact will not adversely affect or be absorbed through any exposed skin; (2) the types of air contaminants have been identified, concentrations measured, and air-purifying respirator available; and (3) all criteria for the use of air-purifying respirators are met. The following PPE are required for Level C protection and shall be made immediately available for use on the site:

- Half-face or full-face respirators,
- HEPA and acid-gas/organic vapor cartridges-P100 filter combination,
- Saranex coveralls (if there is potential contact with petroleum product),
- Latex or polyvinyl chloride (PVC) inner gloves,
- Nitrile outer gloves,
- Chemical-resistant (Neoprene) steel-toed boots,
- PVC over boots (only if potential contact with free product or contaminated soil is present),
- Fluorescent vest (in traffic situations),
- Hard hats, and
- Splash goggles/safety glasses with side shields.

10.0 PERSONNEL AND EQUIPMENT DECONTAMINATION

PSI Standard Operating Procedures as delineated in the Corporate Health and Safety Plan will be followed for the decontamination of all personnel and equipment used during this project. Decontamination setup shall be provided on site if there is contact with petroleum fuels or other substances. A minimum of four basin wash/rinse stations shall be placed in the contamination-reduction area to facilitate decontamination and removal of all PPE including boots and gloves. Plastic sheeting will be used under the wash basins to prevent decontamination water from contaminate the ground under. A drum or other container shall be used for disposal of PPE that will not be reused. In the absence of PPE decontamination, all personnel must follow the appropriate order for removal during decontamination (i.e., boots, coveralls, and respiratory equipment).

Direct contact with contaminated PPE can be avoided by following the proper decontamination sequence. Respirators, when used, are the last items to be removed before leaving the contamination reduction zone. Equipment decontamination procedures shall consist of washing in Alconox or similar detergent in water, and a tap-water rinse followed by a final rinse in deionized water. Water shall be available for cleaning of hands and face before breaks, eating, and drinking at all sites.

All wastewater used for decontamination activities shall be collected from the wash basins and discarded in labeled 55-gallon drums. The drums shall be removed from the site following the investigation. PPE that will not be reused shall be placed in labeled plastic bags and disposed of following site operations. The SHSO shall be responsible for coordinating decontamination procedure and off-site disposal, and shall contact the facility regarding proper disposal of wastewater and contaminated PPE.

11.0 MEDICAL SURVEILLANCE/TRAINING REQUIREMENTS

All personnel must meet the training and medical surveillance requirements specified in 29 CFR 1926.65/1910.120(e) & (f) and 8 CCR 5192(e) & (f). All on-site personnel must have completed the specified 40 hours initial HAZWOPER training and 8 hours annual refresher training, as well as 3 days of on-site training, within the last year. Managers or supervisors of personnel performing site activities must have completed the specified 8 hours of management training and 3 days of on-site training under the direction of an experienced supervisor. In addition, such personnel must have completed and passed, without restrictions, a baseline and an annual medical surveillance examination within the last year. The medical examinations shall have been conducted by or under the supervision of a certified occupational medical physician who is aware of the site-specific hazards. PSI personnel and subcontractors entering the exclusion zone must be trained on the site potential hazards and in safe work procedures. Copies of training certificates shall be available for review upon request.

12.0 EMERGENCY RESPONSE/ACCIDENT INVESTIGATION PROCEDURES

Telephone numbers of the police and fire departments, ambulance service, local hospital, and PSI representatives are provided in the emergency reference sheet in Section 1.0. Directions to the hospital are also provided in Section 1.0 and Figure 1. A copy of this information will be available at the project site.

Any accident/incident resulting in an OSHA-reportable injury or illness, treatment at a hospital or physician's office, property damage, or a near-accident requires that an accident/incident investigation and report be completed by the PHSO with assistance from the SHSO and PM. The investigation shall be initiated as soon as emergency conditions are under control. The purpose of this investigation is not to attribute blame, but rather to assess the pertinent facts so that repeat or similar occurrences can be avoided. PSI shall assure that accidents/injuries are reported to the appropriate local, and state authorities.

12.1 PLANNING

Prior to conducting the investigation, the SHSO shall plan emergency actions and discuss it with personnel conducting project work. Initial planning includes establishing the best means for evacuation from the area in case of a catastrophe (e.g., explosion or fire). Before project activities begin, the SHSO shall locate safe places of refuge should an emergency or accident occur, and advise personnel of these locations during the on-site health and safety meeting. Refer to Sections 12.2, 12.3, 12.6, and 12.7 for a review of emergency procedures.

12.2 EMERGENCY SERVICES

A tested system must exist for rapid and clear distress communications. The SHSO will use an alarm system in the form of a car horn to notify personnel of the emergency. One long blast (at least 5 seconds) requires evacuation and two short blasts that all is clear. The SHSO shall corroborate that all personnel working at the site know how to communicate with the appropriate local emergency response units, and shall provide adequate and clear directions between PSI work locations and the location of those units before commencing any facility investigation or operations. The PSI or subcontractor vehicle shall have a cellular telephone for obtaining assistance in an emergency.

12.3 GENERAL EVACUATION PROCEDURES

If a fire, explosion, or toxic vapor release emergency occurs and a site evacuation is ordered by the SHSO, the SHSO shall:

- Announce the evacuation using a car horn.

- ❖ Evaluate the immediate situation and downwind direction. All personnel will evacuate in the upwind direction (see site plan for evacuation route).

- ❖ Assemble in an upwind area when the situation permits, and take a head count.

- ❖ Determine the extent of the problem and dial 911 to dispatch response teams to locate any missing personnel and/or correct the problem.

12.4 FIRST AID

Qualified personnel shall give first aid and stabilize any employee needing assistance. Life support techniques such as cardiopulmonary resuscitation (CPR) and treatment of life-threatening problems such as bleeding, airway maintenance, and shock shall be given top priority. Professional medical assistance shall be obtained at the earliest possible opportunity. If assistance beyond first aid is required, dial 911 to request emergency medical assistance.

A first-aid kit will be required on the site and an emergency portable eyewash (15 minutes of continuous flushing) may be required at the facility. Prior arrangements must be made to facilitate easy access (preferably within 10 seconds of the work area) to water.

Emergency first-aid procedures for organic compounds include the following:

Exposure	Procedure
Eyes	Flush eyes immediately with fresh warm water for at least 15 minutes while holding the eyelids open. If injury occurs or irritation persists, transport person to emergency room for medical attention as soon as possible.
Skin	Wash skin thoroughly with soap and water. See a doctor if any unusual signs, symptoms, or skin irritation occur. Launder or discard chemically contaminated clothing.
Inhalation	Move exposed person to fresh air. If breathing stopped, apply artificial respiration. **Call 911 immediately**.
Ingestion	If a chemical compound is swallowed, **DO NOT** make the person vomit. **Call the Poison Control Center closest to you immediately. California Poison Control Centers locations and telephone numbers:**

Fresno	**1-800-346-5922**
San Diego	**1-800-876-4766**
San Francisco	**1-800-523-2222**

12.5 PROTECTION FROM BLOOD-BORNE PATHOGENS

Personnel of PSI or its subcontractors who have direct exposure to blood and other potentially infectious materials while administering first aid run the risk of contracting blood-borne infections. These infections include hepatitis B virus (HBV); human immunodeficiency virus (HIV), which causes acquired immunodeficiency syndrome (AIDS); and other blood-borne pathogens. Although the risk of contracting the HIV through occupational exposure is minimal, wearing proper PPE can greatly reduce the potential exposure to blood-borne infections.

Personnel of PSI and its subcontractors shall adhere to OSHA and Cal/OSHA Bloodborne Pathogen Standards as codified in 29 CFR 1910.1030 and 8 CCR 5193 respectively. If personnel must have contact with the victim's blood or other potentially infectious materials or contaminated surfaces, they must wear a pair of latex gloves at a minimum. If personnel are performing CPR, they must wear a pocket mask or equivalent level of protection.

If an employee's or subcontractor's skin or eyes come into contact with blood, the individual must wash the affected area with soap and water and/or continuously flush the eyes for 15 minutes as soon as possible. In addition, workers must wash their hands immediately or as soon as feasible after removing PPE. If soap and water are not immediately available, workers may use other hand-washing measures such as moist wipes and rubbing alcohol. However, personnel of PSI or its subcontractors must wash their hands as soon as possible. Personnel of PSI and its subcontractors must remove PPE before leaving the work area. If the clothing comes in contact with blood, workers must remove it immediately or as soon as feasible. Gloves or other PPE that have potentially come in contact with blood or other infectious fluids and materials shall be disposed of in a designated container and appropriately labeled as "Infectious Waste." The SHSO shall contact a medical waste representative for proper disposal.

12.6 FIRE PROTECTION AND RESPONSE

To minimize fire and explosion hazards, plans and procedures must be coordinated with the local Fire Department. Dial 911 in the event of any fire at either work location.

12.7 GUIDELINES FOR EMERGENCY RESPONSE

If any emergency involving actual or suspected personal injury occurs, the SHSO, the work supervisor, or the surviving person(s) on the site shall follow these steps:

- Remove the exposed or injured person(s) from immediate danger.

- Render first aid if necessary. Decontaminate affected personnel.

- Obtain paramedic service or ambulance transport to local hospital by dialing 911 to get emergency response. Notify the gate guard of the site operations so that a quick response can be effected. A PSI field member will accompany any person to the medical facility and remain with the person until release or admittance is determined.

- Evacuate other personnel at the facility to a safe distance until the Fire Department determines that it is safe for work to resume.

- Contact the PM (or his designee) and the PHSO at the earliest time practicable, and relate details of the incident. Also, notify Ed Rufu, Department Manager of PSI. Mr. Rufu will then make appropriate notifications to government agencies as required by law, and notify client contacts.

- Any accident/incident resulting in an OSHA-reportable injury or illness, treatment at a hospital or physician's office, property damage, or a near-accident requires that an accident/incident report be completed and submitted to the PHSO.

12.8 GUIDELINES FOR A SPILL

Spills of petroleum fuels are of concern because such fuels are highly flammable and explosive and can result in toxic effects if PSI personnel or subcontractors are not adequately protected from exposure.

For minor spills that are perceived not to involve an immediate threat to human health or property damage, do not respond to the spill unless it is safe to do so. Shut off all release valves. For small spills, contain the spilled material with absorbent materials such as paper towels. Let the spilled materials evaporate from the towel(s) before disposal.

For major spills that are perceived to involve immediate threat to public health or the environment, or could result in substantial property damage and environmental contamination, dike the spill away from any storm drains if safe to do so. Do not respond to cleanup; rather, notify the spill response team.

For any spill, call 911 when safe to do so and provide the following information:

- Your name, organization, phone number, and location;
- Number of injured personnel, if any, and nature of injuries, if known;
- Substance spilled;
- Source and cause of the spill;
- Approximate amount and extent of the spill;

- Approximate rate of release;
- Action taken so far;
- Approximate time spill occurred; and
- Any other pertinent information the operator requests.

APPENDIX B - SOIL BORING LOGS

SOIL BORING LOG - B1

BORING NO:	B1
SHEET 1	OF 1

DATE: 9/22/06	PROJECT : KEN-1	PROJECT NO.: 559-6G017
SITE LOCATION:	East 41st Street and Alameda Street, Los Angeles, CA	ELEVATION:
DRILLING COMPANY:	Jet Drilling	DRILLING METHOD: Hollow Stem Auger
DRILLING INFORMATION	WIDTH: 8 INCHES / TOTAL DEPTH: 16 ft	GROUNDWATER DEPTH: NA

DEPTH FT	SAMPLE ID	DESCRIPTION	PID ☒ FID ☒ (PPM)	USCS	REMARKS
	B1-1	Silt, brown, slightly moist	0	ML	
5					no recovery
10	B1-10	Sand, tan, moist, fine to medium, sub-rounded	0	SP	Duplicate sample "E"
15	B1-15	Sand, tan, slightly moist, fine to coarse, sub-angular, well-graded	0	SW	
20					
		Total depth 16 feet Groundwater not encountered Backfilled with soil cuttings			

PREPARED BY: Moises Delgadillo

SOIL BORING LOG - B2

BORING NO:	B2
SHEET 1	OF 1
PROJECT NO.: 559-6G017	
ELEVATION:	

DATE: 9/22/06	PROJECT : KEN-1		
SITE LOCATION:	East 41st Street and Alameda Street, Los Angeles, CA		
DRILLING COMPANY:	Jet Drilling	DRILLING METHOD: Hollow Stem Auger	
DRILLING INFORMATION	WIDTH: 8 INCHES	TOTAL DEPTH: 16 ft	GROUNDWATER DEPTH: NA

DEPTH FT	SAMPLE ID	DESCRIPTION	PID ☒ FID ☒ (PPM)	USCS	REMARKS
	B2-1	Silt, brown, slightly moist	0	ML	
5	B2-5	Sandy silt, brown, slightly moist, very fine	0	ML	
10	B2-10	Silty sand, brown, moist, fine, sub-rounded	0	SM	
15	B2-15	Sand, brown, moist, very fine to fine, sub-rounded	0	SP	
20		Total depth 16 feet Groundwater not encountered Backfilled with soil cuttings			

PREPARED BY: Moises Delgadillo

SOIL BORING LOG - B3

BORING NO:	B3
SHEET 1	OF 1

DATE: 9/22/06	PROJECT : KEN-1	PROJECT NO.: 559-6G017
SITE LOCATION: East 41st Street and Alameda Street, Los Angeles, CA		ELEVATION:
DRILLING COMPANY: Jet Drilling		DRILLING METHOD: Hollow Stem Auger
DRILLING INFORMATION	WIDTH: 8 INCHES	TOTAL DEPTH: 16 ft / GROUNDWATER DEPTH: NA

DEPTH FT	SAMPLE ID	DESCRIPTION	PID ☒ FID ☒ (PPM)	USCS	REMARKS
	B3-1	Silt, brown, slightly moist	0	ML	
5	B3-5	Sandy silt, brown, slightly moist, very fine	0	ML	
10	B3-10	Silty sand, brown, moist, fine, sub-rounded	0	SM	
15	B3-15	Sand, brown, moist, very fine to fine, sub-rounded	0	SP	
20		Total depth 16 feet Groundwater not encountered Backfilled with soil cuttings			

PREPARED BY: Moises Delgadillo

SOIL BORING LOG - B4

BORING NO:	B4
SHEET 1	OF 1
PROJECT NO.:	559-6G017
ELEVATION:	

DATE: 9/22/06	PROJECT : KEN-1		
SITE LOCATION:	East 41st Street and Alameda Street, Los Angeles, CA		
DRILLING COMPANY:	Jet Drilling	DRILLING METHOD:	Hollow Stem Auger
DRILLING INFORMATION	WIDTH: 8 INCHES	TOTAL DEPTH: 16 ft	GROUNDWATER DEPTH: NA

DEPTH FT	SAMPLE ID	DESCRIPTION	PID ☒ FID ☒ (PPM)	USCS	REMARKS
	B4-1	Silt, brown, slightly moist	0	ML	
5	B4-5	Sandy silt, brown, slightly moist, very fine	0	ML	Duplicate sample "C"
10	B4-10	Silty sand, brown, moist, fine, sub-rounded	0	SM	
15	B4-15	Sand, brown, moist, very fine to fine, sub-rounded	0	SP	
20					
		Total depth 16 feet Groundwater not encountered Backfilled with soil cuttings			

PREPARED BY: Moises Delgadillo

SOIL BORING LOG - B5

BORING NO:	B5
SHEET 1	OF 1

DATE: 9/22/06	PROJECT : KEN-1	PROJECT NO.: 559-6G017
SITE LOCATION:	East 41st Street and Alameda Street, Los Angeles, CA	ELEVATION:
DRILLING COMPANY:	Jet Drilling	DRILLING METHOD: Hollow Stem Auger
DRILLING INFORMATION	WIDTH: 8 INCHES / TOTAL DEPTH: 16 ft	GROUNDWATER DEPTH: NA

DEPTH FT	SAMPLE ID	DESCRIPTION	PID ☒ FID ☒ (PPM)	USCS	REMARKS
	B5-1	Silt, brown, slightly moist	0	ML	
5	B5-5	Sandy silt, brown, slightly moist, very fine	0	ML	
10	B5-10	Silty sand, brown, moist, fine, sub-rounded	0	SM	
15	B5-15	Sand, brown, moist, very fine to fine, sub-rounded	0	SP	
20		Total depth 16 feet Groundwater not encountered Backfilled with soil cuttings			

PREPARED BY: Moises Delgadillo

SOIL BORING LOG - B6

BORING NO:	B6
SHEET 1	OF 1

DATE: 9/22/06	PROJECT : KEN-1		PROJECT NO.: 559-6G017
SITE LOCATION:	East 41st Street and Alameda Street, Los Angeles, CA		ELEVATION:
DRILLING COMPANY:	Jet Drilling	DRILLING METHOD: Hollow Stem Auger	
DRILLING INFORMATION	WIDTH: 8 INCHES	TOTAL DEPTH: 16 ft	GROUNDWATER DEPTH: NA

DEPTH FT	SAMPLE ID	DESCRIPTION	PID ☒ FID ☒ (PPM)	USCS	REMARKS
	B6-1	Silt, brown, slightly moist	0	ML	Duplicate sample "A"
5	B6-5	Silty sand, brown, slightly moist to moist, very fine	0	ML	
10	B6-10	Sandy silt, brown, slightly moist, very fine	0	ML	
15	B6-15	Sand, light brown, moist, fine to medium, trace coarse	0	SW	
20					
		Total depth 16 feet Groundwater not encountered Backfilled with soil cuttings			

PREPARED BY: Moises Delgadillo

SOIL BORING LOG - B7

BORING NO:	B7
SHEET 1	OF 1
PROJECT NO.:	559-6G017
ELEVATION:	

DATE: 9/21/06	PROJECT : KEN-1		
SITE LOCATION:	East 41st Street and Alameda Street, Los Angeles, CA		
DRILLING COMPANY:	Jet Drilling	DRILLING METHOD:	Hollow Stem Auger
DRILLING INFORMATION	WIDTH: 8 INCHES	TOTAL DEPTH: 16 ft	GROUNDWATER DEPTH: NA

DEPTH FT	SAMPLE ID	DESCRIPTION	PID ☒ FID ☒ (PPM)	USCS	REMARKS
	B7-1	Silt, brown, slightly moist	0	ML	
5	B7-5	Silty sand, light brown, slightly moist, very fine	0	ML	
10	B7-10	Sand, tan, slightly moist, fine to coarse, sub-rounded, well graded	0	SW	
15	B7-15	Silty sand, light brown, moist, fine to coarse, sub-angular, well graded, trace fine gravel	0	SW	
20					
		Total depth 16 feet Groundwater not encountered Backfilled with soil cuttings			

PREPARED BY: Moises Delgadillo

SOIL BORING LOG - B8

BORING NO:	B8
SHEET 1	OF 1
PROJECT NO.: 559-6G017	
ELEVATION:	

DATE: 9/21/06	PROJECT : KEN-1		
SITE LOCATION: East 41st Street and Alameda Street, Los Angeles, CA			
DRILLING COMPANY: Jet Drilling		DRILLING METHOD: Hollow Stem Auger	
DRILLING INFORMATION	WIDTH: 8 INCHES	TOTAL DEPTH: 16 ft	GROUNDWATER DEPTH: NA

DEPTH FT	SAMPLE ID	DESCRIPTION	PID ☒ FID ☒ (PPM)	USCS	REMARKS
	B8-1	Sandy silt, brown, slightly moist	0	ML	
5	B8-5	Sandy silt, brown, moist	0	ML	
10	B8-10	Sand, light brown, slightly moist to moist, fine to coarse, sub-angular, well graded	0	SW	
15	B8-15	Sand, light gray, slightly moist, fine to coarse, trace fine gravel, well graded	0	SW	
20		Total depth 16 feet Groundwater not encountered Backfilled with soil cuttings			

PREPARED BY: Moises Delgadillo

SOIL BORING LOG - B9

BORING NO:	B9
SHEET 1	OF 1
PROJECT NO.:	559-6G017
ELEVATION:	

DATE: 9/21/06	PROJECT : KEN-1		
SITE LOCATION:	East 41st Street and Alameda Street, Los Angeles, CA		
DRILLING COMPANY:	Jet Drilling	DRILLING METHOD:	Hollow Stem Auger
DRILLING INFORMATION	WIDTH: 8 INCHES	TOTAL DEPTH: 16 ft	GROUNDWATER DEPTH: NA

DEPTH FT	SAMPLE ID	DESCRIPTION	PID ☒ FID ☒ (PPM)	USCS	REMARKS
	B9-1	Silty sand, brown, slightly moist, very fine	0	ML	
5	B9-5	Silty sand, brown, slightly moist, very fine	0	ML	
10	B9-10	Silt, brown, slightly moist, trace very fine sand	0	ML	
15	B9-15	Sand, light gray, slightly moist to moist, fine to coarse, sub-angular, well graded, trace gravel	0	SW	
20		Total depth 16 feet Groundwater not encountered Backfilled with soil cuttings			

PREPARED BY: Moises Delgadillo

SOIL BORING LOG - B10

BORING NO:	**B10**
SHEET 1	OF 1
PROJECT NO.: 559-6G017	
ELEVATION:	

DATE: 9/21/06	PROJECT : KEN-1		
SITE LOCATION:	East 41st Street and Alameda Street, Los Angeles, CA		
DRILLING COMPANY:	Jet Drilling	DRILLING METHOD: Hollow Stem Auger	
DRILLING INFORMATION	WIDTH: 8 INCHES	TOTAL DEPTH: 16 ft	GROUNDWATER DEPTH: NA

DEPTH FT	SAMPLE ID	DESCRIPTION	PID ☒ FID ☒ (PPM)	USCS	REMARKS
	B10-1	Sandy silt, light brown, slightly moist, very fine	0	ML	
5	B10-5	Sand, beige, slightly moist, fine to coarse, well graded	0	SW	
10	B10-10	Sand, light gray, moist, fine to medium, sub-rounded	0	SP	Duplicate sample "H"
15	B10-15	Sand, light gray, moist, fine to coarse, sub-angular, well-graded	0	SW	
20					
		Total depth 16 feet Groundwater not encountered Backfilled with soil cuttings			

PREPARED BY: Moises Delgadillo

SOIL BORING LOG - B11

BORING NO:	B11
SHEET 1	OF 1

DATE: 9/21/06	PROJECT : KEN-1	PROJECT NO.: 559-6G017
SITE LOCATION:	East 41st Street and Alameda Street, Los Angeles, CA	ELEVATION:
DRILLING COMPANY:	Jet Drilling	DRILLING METHOD: Hollow Stem Auger
DRILLING INFORMATION	WIDTH: 8 INCHES	TOTAL DEPTH: 16 ft / GROUNDWATER DEPTH: NA

DEPTH FT	SAMPLE ID	DESCRIPTION	PID ☒ FID ☒ (PPM)	USCS	REMARKS
	B11-1	Silt, dark brown, slightly moist to moist, trace sand	0	ML	
5	B11-5	Sandy silt, brown, slightly moist to moist, very fine sand	0	ML	
10	B11-10	Silty sand, brown, moist, fine sand	0	SM	
15	B11-15	Sand, light gray, slightly moist, fine to coarse, sub-angular, well graded	0	SW	
20		Total depth 16 feet Groundwater not encountered Backfilled with soil cuttings			

PREPARED BY: Moises Delgadillo

SOIL BORING LOG - B12

BORING NO:	B12
SHEET 1	OF 1

DATE: 9/21/06	PROJECT : KEN-1	PROJECT NO.: 559-6G017
SITE LOCATION:	East 41st Street and Alameda Street, Los Angeles, CA	ELEVATION:
DRILLING COMPANY:	Jet Drilling	DRILLING METHOD: Hollow Stem Auger
DRILLING INFORMATION	WIDTH: 8 INCHES / TOTAL DEPTH: 16 ft	GROUNDWATER DEPTH: NA

DEPTH FT	SAMPLE ID	DESCRIPTION	PID ☒ FID ☒ (PPM)	USCS	REMARKS
	B12-1	Silt, dark brown, slightly moist to moist	0	ML	
5	B12-5	Sandy silt, dark brown, moist, very fine	0	ML	
10	B12-10	Sand, light gray, moist, fine to medium, sub-rounded	0	SP	
15	B12-15	Sand, light gray, slightly moist, fine to coarse, sub-angular, well graded	0	SW	Duplicate sample "F"
20					
		Total depth 16 feet Groundwater not encountered Backfilled with soil cuttings			

PREPARED BY: Moises Delgadillo

SOIL BORING LOG - B13

BORING NO:	B13
SHEET 1	OF 1

DATE: 9/21/06	PROJECT : KEN-1	PROJECT NO.: 559-6G017
SITE LOCATION: East 41st Street and Alameda Street, Los Angeles, CA		ELEVATION:
DRILLING COMPANY: Jet Drilling		DRILLING METHOD: Hollow Stem Auger
DRILLING INFORMATION	WIDTH: 8 INCHES	TOTAL DEPTH: 16 ft / GROUNDWATER DEPTH: NA

DEPTH FT	SAMPLE ID	DESCRIPTION	PID ☒ FID ☒ (PPM)	USCS	REMARKS
	B13-1	Silt, brown, slightly moist	0	ML	
5	B13-5	Sandy silt, brown, slightly moist to moist, very fine sand	0	ML	
10	B13-10	Silty sand, brown, moist, fine to coarse, well graded	0	SM	
15	B13-15	Sand, light gray, slightly moist, fine to coarse, well graded, trace fine gravel	0	SW	
20		Total depth 16 feet Groundwater not encountered Backfilled with soil cuttings			

PREPARED BY: Moises Delgadillo

SOIL BORING LOG - B14

BORING NO:	**B14**
SHEET 1	OF 1

DATE: 9/21/06	PROJECT : KEN-1	PROJECT NO.: 559-6G017
SITE LOCATION:	East 41st Street and Alameda Street, Los Angeles, CA	ELEVATION:
DRILLING COMPANY:	Jet Drilling	DRILLING METHOD: Hollow Stem Auger
DRILLING INFORMATION	WIDTH: 8 INCHES	TOTAL DEPTH: 16 ft / GROUNDWATER DEPTH: NA

DEPTH FT	SAMPLE ID	DESCRIPTION	PID ☒ FID ☒ (PPM)	USCS	REMARKS
	B14-1	Silt, brown, slightly moist	0	ML	
5	B14-5	Sandy silt, light brown, slightly moist, trace very fine sand	0	ML	
10	B14-10	Silty sand, light gray, moist, fine to medium, sub-rounded	0	SM	
15	B14-15	Sand, light gray, moist, fine, sub-rounded	0	SP	Duplicate sample "G"
20		Total depth 16 feet Groundwater not encountered Backfilled with soil cuttings			

PREPARED BY: Moises Delgadillo

SOIL BORING LOG - B15

BORING NO:	B15
SHEET	1 OF 1

DATE: 9/21/06	PROJECT : KEN-1	PROJECT NO.: 559-6G017
SITE LOCATION:	East 41st Street and Alameda Street, Los Angeles, CA	ELEVATION:
DRILLING COMPANY:	Jet Drilling	DRILLING METHOD: Hollow Stem Auger
DRILLING INFORMATION	WIDTH: 8 INCHES / TOTAL DEPTH: 16 ft	GROUNDWATER DEPTH: NA

DEPTH FT	SAMPLE ID	DESCRIPTION	PID ☒ FID ☒ (PPM)	USCS	REMARKS
	B15-1	Silt, brown, slightly moist	0	ML	
5	B15-5	Sand, light gray, slightly moist to moist, fine to medium, sub-rounded	0	SP	
10	B15-10	Sand, light gray, moist, fine, sub-rounded	0	SP	
15	B15-15	Sand, light gray, moist, fine to medium, sub-angular	0	SP	
20					
		Total depth 16 feet Groundwater not encountered Backfilled with soil cuttings			

PREPARED BY: Moises Delgadillo

SOIL BORING LOG - B16

BORING NO:	B16
SHEET 1	OF 1
PROJECT NO.: 559-6G017	
ELEVATION:	

DATE: 9/21/06	PROJECT : KEN-1		
SITE LOCATION:	East 41st Street and Alameda Street, Los Angeles, CA		
DRILLING COMPANY:	Jet Drilling	DRILLING METHOD: Hollow Stem Auger	
DRILLING INFORMATION	WIDTH: 8 INCHES	TOTAL DEPTH: 16 ft	GROUNDWATER DEPTH: NA

DEPTH FT	SAMPLE ID	DESCRIPTION	PID ☒ FID ☒ (PPM)	USCS	REMARKS
	B16-1	Sandy silt, light brown, slightly moist, very fine	0	ML	
5	B16-5	Silty sand, light brown, slightly moist to moist, very fine to fine, slight oxidation	0	SM	
10	B16-10	Sand, tan, slightly moist, fine to coarse, sub-angular, well graded	0	SW	
15	B16-15	Sand, tan, slightly moist, fine to coarse, sub-angular, trace fine gravel, well-graded	0	SW	
20					
		Total depth 16 feet Groundwater not encountered Backfilled with soil cuttings			

PREPARED BY: Moises Delgadillo

SOIL BORING LOG - B17

BORING NO:	B17
SHEET	1 OF 1

DATE: 9/21/06	PROJECT : KEN-1	PROJECT NO.: 559-6G017
SITE LOCATION:	East 41st Street and Alameda Street, Los Angeles, CA	ELEVATION:
DRILLING COMPANY:	Jet Drilling	DRILLING METHOD: Hollow Stem Auger
DRILLING INFORMATION	WIDTH: 8 INCHES / TOTAL DEPTH: 16 ft	GROUNDWATER DEPTH: NA

DEPTH FT	SAMPLE ID	DESCRIPTION	PID ☒ FID ☒ (PPM)	USCS	REMARKS
	B17-1	Sandy silt, brown, slightly moist, very fine sand	0	ML	Duplicate sample "D"
5	B17-5	Silty sand, brown, moist, fine	0	SM	
10	B17-10	Sand, light brown, moist, fine to medium, trace coarse to fine gravel, well graded	0	SW	
15	B17-15	Sand, light brown, moist, fine to medium, well-graded	0	SP	
20		Total depth 16 feet Groundwater not encountered Backfilled with soil cuttings			

PREPARED BY: Moises Delgadillo

SOIL BORING LOG - B18

BORING NO:	B18
SHEET 1	OF 1
PROJECT NO.: 559-6G017	
ELEVATION:	

DATE: 9/21/06	PROJECT : KEN-1		
SITE LOCATION: East 41st Street and Alameda Street, Los Angeles, CA			
DRILLING COMPANY: Jet Drilling		DRILLING METHOD: Hollow Stem Auger	
DRILLING INFORMATION	WIDTH: 8 INCHES	TOTAL DEPTH: 16 ft	GROUNDWATER DEPTH: NA

DEPTH FT	SAMPLE ID	DESCRIPTION	PID ☒ FID ☒ (PPM)	USCS	REMARKS
	B18-1	Silt, brown, slightly moist	0	ML	
5	B18-5	Silty sand, brown, moist, fine	0	SM	
10	B18-10	Silty sand, brown, moist to saturated, medium to coarse, sub-angular	0	SM	
15	B18-15	Sand, light brown, moist, fine to medium, sub-angular, trace coarse, well graded	0	SW	
20					
		Total depth 16 feet Groundwater not encountered Backfilled with soil cuttings			

PREPARED BY: Moises Delgadillo

SOIL BORING LOG - B19

BORING NO:	B19
SHEET 1	OF 1

DATE: 9/21/06	PROJECT : KEN-1	PROJECT NO.: 559-6G017
SITE LOCATION:	East 41st Street and Alameda Street, Los Angeles, CA	ELEVATION:
DRILLING COMPANY:	Jet Drilling	DRILLING METHOD: Hollow Stem Auger
DRILLING INFORMATION	WIDTH: 8 INCHES / TOTAL DEPTH: 5 ft	GROUNDWATER DEPTH: NA

DEPTH FT	SAMPLE ID	DESCRIPTION	PID ☒ FID ☒ (PPM)	USCS	REMARKS
	B19-1	Silt, brown, slightly moist	0	ML	
5					Refusal
10					
15					
20					
		Total depth 5 feet Groundwater not encountered Backfilled with soil cuttings			

PREPARED BY: Moises Delgadillo

SOIL BORING LOG - B20

BORING NO:	B20
SHEET	1 OF 1

DATE: 9/22/06	PROJECT : KEN-1	PROJECT NO.: 559-6G017
SITE LOCATION:	East 41st Street and Alameda Street, Los Angeles, CA	ELEVATION:
DRILLING COMPANY:	Jet Drilling	DRILLING METHOD: Hollow Stem Auger
DRILLING INFORMATION	WIDTH: 8 INCHES	TOTAL DEPTH: 16 ft / GROUNDWATER DEPTH: NA

DEPTH FT	SAMPLE ID	DESCRIPTION	PID ☒ FID ☒ (PPM)	USCS	REMARKS
	B20-1	Silty sand, brown, moist, very fine to fine	0	SM	
5	B20-5	Sand, tan, moist, fine to coarse, sub-angular, well graded	0	SW	Duplicate sample "B"
10	B20-10	Sand, tan, moist, medium to coarse, sub-angular, trace fine, well graded	0	SW	
15	B20-15	Silty sand, tan, moist, fine to coarse, sub-rounded, trace fine gravel, well graded	0	SM/SW	
20		Total depth 16 feet Groundwater not encountered Backfilled with soil cuttings			

PREPARED BY: Moises Delgadillo

APPENDIX C - LABORATORY ANALYTICAL REPORT AND CHAIN OF CUSTODY RECORDS

03 October 2006

Eric Fraske
PSI - Long Beach
3960 Gilman Street
Long Beach, CA 90815
RE: KEN-1

Enclosed are the results of analyses for samples received by the laboratory on 09/22/06 17:00. If you have any questions concerning this report, please feel free to contact me.

Sincerely,

John Shepler
Laboratory Director

PSI - Long Beach 3960 Gilman Street Long Beach CA, 90815	Project: KEN-1 Project Number: 559-6G017 Project Manager: Eric Fraske	**Reported:** 10/03/06 16:02

ANALYTICAL REPORT FOR SAMPLES

Sample ID	Laboratory ID	Matrix	Date Sampled	Date Received
B14-1	T601317-01	Soil	09/21/06 10:12	09/22/06 17:00
B14-5	T601317-02	Soil	09/21/06 10:15	09/22/06 17:00
B14-10	T601317-03	Soil	09/21/06 10:19	09/22/06 17:00
B14-15	T601317-04	Soil	09/21/06 10:21	09/22/06 17:00
B13-1	T601317-05	Soil	09/21/06 10:43	09/22/06 17:00
B13-5	T601317-06	Soil	09/21/06 10:45	09/22/06 17:00
B13-10	T601317-07	Soil	09/21/06 10:48	09/22/06 17:00
B13-15	T601317-08	Soil	09/21/06 10:51	09/22/06 17:00
B8-1	T601317-09	Soil	09/21/06 11:08	09/22/06 17:00
B8-5	T601317-10	Soil	09/21/06 11:11	09/22/06 17:00
B8-10	T601317-11	Soil	09/21/06 11:13	09/22/06 17:00
B8-15	T601317-12	Soil	09/21/06 11:16	09/22/06 17:00
B12-1	T601317-13	Soil	09/21/06 11:37	09/22/06 17:00
B12-5	T601317-14	Soil	09/21/06 11:38	09/22/06 17:00
B12-10	T601317-15	Soil	09/21/06 11:40	09/22/06 17:00
B12-15	T601317-16	Soil	09/21/06 11:45	09/22/06 17:00
B7-1	T601317-17	Soil	09/21/06 13:01	09/22/06 17:00
B7-5	T601317-18	Soil	09/21/06 13:14	09/22/06 17:00
B7-10	T601317-19	Soil	09/21/06 13:16	09/22/06 17:00
B7-15	T601317-20	Soil	09/21/06 13:21	09/22/06 17:00
B11-1	T601317-21	Soil	09/21/06 13:36	09/22/06 17:00
B11-5	T601317-22	Soil	09/21/06 13:39	09/22/06 17:00
B11-10	T601317-23	Soil	09/21/06 13:42	09/22/06 17:00
B11-15	T601317-24	Soil	09/21/06 13:45	09/22/06 17:00
B16-1	T601317-25	Soil	09/21/06 14:01	09/22/06 17:00
B16-5	T601317-26	Soil	09/21/06 14:04	09/22/06 17:00
B16-10	T601317-27	Soil	09/21/06 14:06	09/22/06 17:00
B16-15	T601317-28	Soil	09/21/06 14:09	09/22/06 17:00
B17-1	T601317-29	Soil	09/21/06 14:18	09/22/06 17:00

SunStar Laboratories, Inc.

The results in this report apply to the samples analyzed in accordance with the chain o custody document. This analytical report must be reproduced in its entirety.

PSI - Long Beach	Project: KEN-1	
3960 Gilman Street	Project Number: 559-6G017	**Reported:**
Long Beach CA, 90815	Project Manager: Eric Fraske	10/03/06 16:02

ANALYTICAL REPORT FOR SAMPLES

Sample ID	Laboratory ID	Matrix	Date Sampled	Date Received
B17-5	T601317-30	Soil	09/21/06 14:20	09/22/06 17:00
B17-10	T601317-31	Soil	09/21/06 14:22	09/22/06 17:00
B17-15	T601317-32	Soil	09/21/06 14:25	09/22/06 17:00
B18-1	T601317-33	Soil	09/21/06 14:35	09/22/06 17:00
B18-5	T601317-34	Soil	09/21/06 14:39	09/22/06 17:00
B18-10	T601317-35	Soil	09/21/06 14:41	09/22/06 17:00
B18-15	T601317-36	Soil	09/21/06 14:44	09/22/06 17:00
B19-1	T601317-37	Soil	09/21/06 14:51	09/22/06 17:00
B20-1	T601317-38	Soil	09/22/06 07:36	09/22/06 17:00
B20-5	T601317-39	Soil	09/22/06 07:39	09/22/06 17:00
B20-10	T601317-40	Soil	09/22/06 07:41	09/22/06 17:00
B20-15	T601317-41	Soil	09/22/06 07:46	09/22/06 17:00
B6-1	T601317-42	Soil	09/22/06 07:59	09/22/06 17:00
B6-5	T601317-43	Soil	09/22/06 08:03	09/22/06 17:00
B6-10	T601317-44	Soil	09/22/06 08:06	09/22/06 17:00
B6-15	T601317-45	Soil	09/22/06 08:10	09/22/06 17:00
B9-1	T601317-46	Soil	09/21/06 08:48	09/22/06 17:00
B9-5	T601317-47	Soil	09/21/06 08:51	09/22/06 17:00
B9-10	T601317-48	Soil	09/21/06 08:55	09/22/06 17:00
B9-15	T601317-49	Soil	09/21/06 09:01	09/22/06 17:00
B10-1	T601317-50	Soil	09/21/06 09:18	09/22/06 17:00
B10-5	T601317-51	Soil	09/21/06 09:22	09/22/06 17:00
B10-10	T601317-52	Soil	09/21/06 09:26	09/22/06 17:00
B10-15	T601317-53	Soil	09/21/06 09:31	09/22/06 17:00
B15-1	T601317-54	Soil	09/21/06 09:44	09/22/06 17:00
B15-5	T601317-55	Soil	09/21/06 09:47	09/22/06 17:00
B15-10	T601317-56	Soil	09/21/06 09:51	09/22/06 17:00
B15-15	T601317-57	Soil	09/21/06 09:56	09/22/06 17:00
B1-1	T601317-58	Soil	09/22/06 08:18	09/22/06 17:00
B1-10	T601317-59	Soil	09/22/06 08:26	09/22/06 17:00

SunStar Laboratories, Inc.

The results in this report apply to the samples analyzed in accordance with the chain o custody document. This analytical report must be reproduced in its entirety.



PSI - Long Beach	Project: KEN-1	
3960 Gilman Street	Project Number: 559-6G017	**Reported:**
Long Beach CA, 90815	Project Manager: Eric Fraske	10/03/06 16:02

ANALYTICAL REPORT FOR SAMPLES

Sample ID	Laboratory ID	Matrix	Date Sampled	Date Received
B1-15	T601317-60	Soil	09/22/06 08:30	09/22/06 17:00
B2-1	T601317-61	Soil	09/22/06 08:43	09/22/06 17:00
B2-5	T601317-62	Soil	09/22/06 08:47	09/22/06 17:00
B2-10	T601317-63	Soil	09/22/06 08:50	09/22/06 17:00
B2-15	T601317-64	Soil	09/22/06 08:52	09/22/06 17:00
B3-1	T601317-65	Soil	09/22/06 09:05	09/22/06 17:00
B3-5	T601317-66	Soil	09/22/06 09:08	09/22/06 17:00
B3-10	T601317-67	Soil	09/22/06 09:11	09/22/06 17:00
B3-15	T601317-68	Soil	09/22/06 09:14	09/22/06 17:00
B4-1	T601317-69	Soil	09/22/06 09:27	09/22/06 17:00
B4-5	T601317-70	Soil	09/22/06 09:30	09/22/06 17:00
B4-10	T601317-71	Soil	09/22/06 09:33	09/22/06 17:00
B4-15	T601317-72	Soil	09/22/06 09:34	09/22/06 17:00
B5-1	T601317-73	Soil	09/22/06 09:45	09/22/06 17:00
B5-5	T601317-74	Soil	09/22/06 09:48	09/22/06 17:00
B5-10	T601317-75	Soil	09/22/06 09:50	09/22/06 17:00
B5-15	T601317-76	Soil	09/22/06 09:53	09/22/06 17:00
A	T601317-77	Soil	09/22/06 00:00	09/22/06 17:00
B	T601317-78	Soil	09/22/06 00:00	09/22/06 17:00
C	T601317-79	Soil	09/22/06 00:00	09/22/06 17:00
D	T601317-80	Soil	09/22/06 00:00	09/22/06 17:00
E	T601317-81	Soil	09/22/06 00:00	09/22/06 17:00
F	T601317-82	Soil	09/22/06 00:00	09/22/06 17:00
G	T601317-83	Soil	09/22/06 00:00	09/22/06 17:00
H	T601317-84	Soil	09/22/06 00:00	09/22/06 17:00

PSI - Long Beach	Project: KEN-1	
3960 Gilman Street	Project Number: 559-6G017	**Reported:**
Long Beach CA, 90815	Project Manager: Eric Fraske	10/03/06 16:02

B14-1
T601317-01 (Soil)

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Not
SunStar Laboratories, Inc.									
Metals by EPA 6010B									
Antimony	ND	3.0	mg/kg	1	6092603	09/26/06	09/27/06	EPA 6010B	
Silver	ND	2.0	"	"	"	"	"	"	
Arsenic	**0.85**	0.22	"	"	"	"	"	"	
Barium	**190**	1.0	"	"	"	"	"	"	
Beryllium	ND	1.0	"	"	"	"	"	"	
Cadmium	ND	1.6	"	"	"	"	"	"	
Chromium	**18**	2.0	"	"	"	"	"	"	
Cobalt	**11**	2.0	"	"	"	"	"	"	
Copper	**42**	1.0	"	"	"	"	"	"	
Lead	**57**	3.0	"	"	"	"	"	"	
Molybdenum	ND	1.0	"	"	"	"	"	"	
Nickel	**14**	2.0	"	"	"	"	"	"	
Selenium	ND	5.0	"	"	"	"	"	"	
Thallium	ND	2.0	"	"	"	"	"	"	
Vanadium	**38**	5.0	"	"	"	"	"	"	
Zinc	**120**	1.0	"	"	"	"	"	"	
Cold Vapor Extraction EPA 7470/7471									
Mercury	**0.12**	0.10	mg/kg	1	6092608	09/26/06	09/29/06	EPA 7471A Soil	
Conventional Chemistry Parameters by APHA/EPA Methods									
pH	**6.8**		pH Units	1	6092703	09/27/06	09/29/06	EPA 9045B	

SunStar Laboratories, Inc.

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PSI - Long Beach	Project: KEN-1	
3960 Gilman Street	Project Number: 559-6G017	**Reported:**
Long Beach CA, 90815	Project Manager: Eric Fraske	10/03/06 16:02

B14-5
T601317-02 (Soil)

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Not
SunStar Laboratories, Inc.									
Metals by EPA 6010B									
Antimony	ND	3.0	mg/kg	1	6092603	09/26/06	09/27/06	EPA 6010B	
Silver	ND	2.0	"	"	"	"	"	"	
Arsenic	ND	0.22	"	"	"	"	"	"	
Barium	**120**	1.0	"	"	"	"	"	"	
Beryllium	ND	1.0	"	"	"	"	"	"	
Cadmium	ND	1.6	"	"	"	"	"	"	
Chromium	**14**	2.0	"	"	"	"	"	"	
Cobalt	**8.8**	2.0	"	"	"	"	"	"	
Copper	**15**	1.0	"	"	"	"	"	"	
Lead	**3.8**	3.0	"	"	"	"	"	"	
Molybdenum	ND	1.0	"	"	"	"	"	"	
Nickel	**9.5**	2.0	"	"	"	"	"	"	
Selenium	ND	5.0	"	"	"	"	"	"	
Thallium	ND	2.0	"	"	"	"	"	"	
Vanadium	**32**	5.0	"	"	"	"	"	"	
Zinc	**38**	1.0	"	"	"	"	"	"	
Cold Vapor Extraction EPA 7470/7471									
Mercury	ND	0.10	mg/kg	1	6092608	09/26/06	09/29/06	EPA 7471A Soil	
Conventional Chemistry Parameters by APHA/EPA Methods									
pH	**7.2**		pH Units	1	6092703	09/27/06	09/29/06	EPA 9045B	

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PSI - Long Beach	Project: KEN-1	
3960 Gilman Street	Project Number: 559-6G017	**Reported:**
Long Beach CA, 90815	Project Manager: Eric Fraske	10/03/06 16:02

B14-10
T601317-03 (Soil)

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Not
SunStar Laboratories, Inc.									
Metals by EPA 6010B									
Antimony	ND	3.0	mg/kg	1	6092603	09/26/06	09/27/06	EPA 6010B	
Silver	ND	2.0	"	"	"	"	"	"	
Arsenic	ND	0.22	"	"	"	"	"	"	
Barium	**95**	1.0	"	"	"	"	"	"	
Beryllium	ND	1.0	"	"	"	"	09/27/06	"	
Cadmium	ND	1.6	"	"	"	"	09/27/06	"	
Chromium	**11**	2.0	"	"	"	"	"	"	
Cobalt	**7.9**	2.0	"	"	"	"	"	"	
Copper	**12**	1.0	"	"	"	"	"	"	
Lead	ND	3.0	"	"	"	"	"	"	
Molybdenum	ND	1.0	"	"	"	"	"	"	
Nickel	**7.4**	2.0	"	"	"	"	"	"	
Selenium	ND	5.0	"	"	"	"	"	"	
Thallium	ND	2.0	"	"	"	"	"	"	
Vanadium	**28**	5.0	"	"	"	"	"	"	
Zinc	**32**	1.0	"	"	"	"	"	"	
Cold Vapor Extraction EPA 7470/7471									
Mercury	ND	0.10	mg/kg	1	6092608	09/26/06	09/29/06	EPA 7471A Soil	
Conventional Chemistry Parameters by APHA/EPA Methods									
pH	**7.2**		pH Units	1	6092703	09/27/06	09/29/06	EPA 9045B	

The results in this report apply to the samples analyzed in accordance with the chain o custody document. This analytical report must be reproduced in its entirety.

PSI - Long Beach	Project: KEN-1	
3960 Gilman Street	Project Number: 559-6G017	**Reported:**
Long Beach CA, 90815	Project Manager: Eric Fraske	10/03/06 16:02

B14-15
T601317-04 (Soil)

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Not
SunStar Laboratories, Inc.									
Metals by EPA 6010B									
Antimony	ND	3.0	mg/kg	1	6092603	09/26/06	09/27/06	EPA 6010B	
Silver	ND	2.0	"	"	"	"	"	"	
Arsenic	ND	0.22	"	"	"	"	"	"	
Barium	**63**	1.0	"	"	"	"	"	"	
Beryllium	ND	1.0	"	"	"	"	"	"	
Cadmium	ND	1.6	"	"	"	"	"	"	
Chromium	**5.6**	2.0	"	"	"	"	"	"	
Cobalt	**4.8**	2.0	"	"	"	"	"	"	
Copper	**5.7**	1.0	"	"	"	"	"	"	
Lead	ND	3.0	"	"	"	"	"	"	
Molybdenum	ND	1.0	"	"	"	"	"	"	
Nickel	**3.5**	2.0	"	"	"	"	"	"	
Selenium	ND	5.0	"	"	"	"	"	"	
Thallium	ND	2.0	"	"	"	"	"	"	
Vanadium	**18**	5.0	"	"	"	"	"	"	
Zinc	**24**	1.0	"	"	"	"	"	"	
Cold Vapor Extraction EPA 7470/7471									
Mercury	ND	0.10	mg/kg	1	6092608	09/26/06	09/29/06	EPA 7471A Soil	
Conventional Chemistry Parameters by APHA/EPA Methods									
pH	**7.4**		pH Units	1	6092703	09/27/06	09/29/06	EPA 9045B	

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PSI - Long Beach	Project: KEN-1	
3960 Gilman Street	Project Number: 559-6G017	**Reported:**
Long Beach CA, 90815	Project Manager: Eric Fraske	10/03/06 16:02

B13-1
T601317-05 (Soil)

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Not
SunStar Laboratories, Inc.									
Metals by EPA 6010B									
Antimony	ND	3.0	mg/kg	1	6092603	09/26/06	09/27/06	EPA 6010B	
Silver	ND	2.0	"	"	"	"	"	"	
Arsenic	**19**	0.22	"	"	"	"	"	"	
Barium	**200**	1.0	"	"	"	"	"	"	
Beryllium	ND	1.0	"	"	"	"	09/27/06	"	
Cadmium	ND	1.6	"	"	"	"	09/27/06	"	
Chromium	**22**	2.0	"	"	"	"	"	"	
Cobalt	**12**	2.0	"	"	"	"	"	"	
Copper	**50**	1.0	"	"	"	"	"	"	
Lead	**87**	3.0	"	"	"	"	"	"	
Molybdenum	ND	1.0	"	"	"	"	"	"	
Nickel	**16**	2.0	"	"	"	"	"	"	
Selenium	ND	5.0	"	"	"	"	"	"	
Thallium	ND	2.0	"	"	"	"	"	"	
Vanadium	**45**	5.0	"	"	"	"	"	"	
Zinc	**130**	1.0	"	"	"	"	"	"	
Cold Vapor Extraction EPA 7470/7471									
Mercury	**0.19**	0.10	mg/kg	1	6092608	09/26/06	09/29/06	EPA 7471A Soil	
Conventional Chemistry Parameters by APHA/EPA Methods									
pH	**6.8**		pH Units	1	6092703	09/27/06	09/29/06	EPA 9045B	

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PSI - Long Beach	Project: KEN-1	
3960 Gilman Street	Project Number: 559-6G017	**Reported:**
Long Beach CA, 90815	Project Manager: Eric Fraske	10/03/06 16:02

B13-5
T601317-06 (Soil)

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Not
SunStar Laboratories, Inc.									
Metals by EPA 6010B									
Antimony	ND	3.0	mg/kg	1	6092603	09/26/06	09/27/06	EPA 6010B	
Silver	ND	2.0	"	"	"	"	"	"	
Arsenic	**11**	0.22	"	"	"	"	"	"	
Barium	**210**	1.0	"	"	"	"	"	"	
Beryllium	ND	1.0	"	"	"	"	09/27/06	"	
Cadmium	ND	1.6	"	"	"	"	09/27/06	"	
Chromium	**26**	2.0	"	"	"	"	"	"	
Cobalt	**16**	2.0	"	"	"	"	"	"	
Copper	**41**	1.0	"	"	"	"	"	"	
Lead	**5.4**	3.0	"	"	"	"	"	"	
Molybdenum	ND	1.0	"	"	"	"	"	"	
Nickel	**18**	2.0	"	"	"	"	"	"	
Selenium	ND	5.0	"	"	"	"	"	"	
Thallium	ND	2.0	"	"	"	"	"	"	
Vanadium	**61**	5.0	"	"	"	"	"	"	
Zinc	**77**	1.0	"	"	"	"	"	"	
Cold Vapor Extraction EPA 7470/7471									
Mercury	**0.11**	0.10	mg/kg	1	6092608	09/26/06	09/29/06	EPA 7471A Soil	
Conventional Chemistry Parameters by APHA/EPA Methods									
pH	**7.0**		pH Units	1	6092703	09/27/06	09/29/06	EPA 9045B	

PSI - Long Beach	Project: KEN-1	
3960 Gilman Street	Project Number: 559-6G017	**Reported:**
Long Beach CA, 90815	Project Manager: Eric Fraske	10/03/06 16:02

B13-10
T601317-07 (Soil)

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Not
SunStar Laboratories, Inc.									
Metals by EPA 6010B									
Antimony	ND	3.0	mg/kg	1	6092603	09/26/06	09/27/06	EPA 6010B	
Silver	ND	2.0	"	"	"	"	"	"	
Arsenic	ND	0.22	"	"	"	"	"	"	
Barium	**120**	1.0	"	"	"	"	"	"	
Beryllium	ND	1.0	"	"	"	"	09/27/06	"	
Cadmium	ND	1.6	"	"	"	"	09/27/06	"	
Chromium	**17**	2.0	"	"	"	"	"	"	
Cobalt	**9.5**	2.0	"	"	"	"	"	"	
Copper	**55**	1.0	"	"	"	"	"	"	
Lead	ND	3.0	"	"	"	"	"	"	
Molybdenum	ND	1.0	"	"	"	"	"	"	
Nickel	**9.6**	2.0	"	"	"	"	"	"	
Selenium	ND	5.0	"	"	"	"	"	"	
Thallium	ND	2.0	"	"	"	"	"	"	
Vanadium	**36**	5.0	"	"	"	"	"	"	
Zinc	**56**	1.0	"	"	"	"	"	"	
Cold Vapor Extraction EPA 7470/7471									
Mercury	**0.10**	0.10	mg/kg	1	6092608	09/26/06	09/29/06	EPA 7471A Soil	
Conventional Chemistry Parameters by APHA/EPA Methods									
pH	**7.3**		pH Units	1	6092703	09/27/06	09/29/06	EPA 9045B	

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PSI - Long Beach	Project: KEN-1	
3960 Gilman Street	Project Number: 559-6G017	**Reported:**
Long Beach CA, 90815	Project Manager: Eric Fraske	10/03/06 16:02

B13-15
T601317-08 (Soil)

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Not
SunStar Laboratories, Inc.									
Metals by EPA 6010B									
Antimony	ND	3.0	mg/kg	1	6092603	09/26/06	09/27/06	EPA 6010B	
Silver	ND	2.0	"	"	"	"	"	"	
Arsenic	ND	0.22	"	"	"	"	"	"	
Barium	**30**	1.0	"	"	"	"	"	"	
Beryllium	ND	1.0	"	"	"	"	09/27/06	"	
Cadmium	ND	1.6	"	"	"	"	09/27/06	"	
Chromium	ND	2.0	"	"	"	"	"	"	
Cobalt	**2.1**	2.0	"	"	"	"	"	"	
Copper	**1.7**	1.0	"	"	"	"	"	"	
Lead	ND	3.0	"	"	"	"	"	"	
Molybdenum	ND	1.0	"	"	"	"	"	"	
Nickel	ND	2.0	"	"	"	"	"	"	
Selenium	ND	5.0	"	"	"	"	"	"	
Thallium	ND	2.0	"	"	"	"	"	"	
Vanadium	**6.5**	5.0	"	"	"	"	"	"	
Zinc	**9.7**	1.0	"	"	"	"	"	"	
Cold Vapor Extraction EPA 7470/7471									
Mercury	ND	0.10	mg/kg	1	6092608	09/26/06	09/29/06	EPA 7471A Soil	
Conventional Chemistry Parameters by APHA/EPA Methods									
pH	**7.6**		pH Units	1	6092703	09/27/06	09/29/06	EPA 9045B	

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PSI - Long Beach	Project: KEN-1	
3960 Gilman Street	Project Number: 559-6G017	**Reported:**
Long Beach CA, 90815	Project Manager: Eric Fraske	10/03/06 16:02

B8-1
T601317-09 (Soil)

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Not
SunStar Laboratories, Inc.									
Metals by EPA 6010B									
Antimony	ND	3.0	mg/kg	1	6092603	09/26/06	09/27/06	EPA 6010B	
Silver	ND	2.0	"	"	"	"	"	"	
Arsenic	**1.4**	0.22	"	"	"	"	"	"	
Barium	**130**	1.0	"	"	"	"	"	"	
Beryllium	ND	1.0	"	"	"	"	09/27/06	"	
Cadmium	ND	1.6	"	"	"	"	09/27/06	"	
Chromium	**10**	2.0	"	"	"	"	"	"	
Cobalt	**7.9**	2.0	"	"	"	"	"	"	
Copper	**17**	1.0	"	"	"	"	"	"	
Lead	**4.7**	3.0	"	"	"	"	"	"	
Molybdenum	ND	1.0	"	"	"	"	"	"	
Nickel	**8.3**	2.0	"	"	"	"	"	"	
Selenium	ND	5.0	"	"	"	"	"	"	
Thallium	ND	2.0	"	"	"	"	"	"	
Vanadium	**28**	5.0	"	"	"	"	"	"	
Zinc	**33**	1.0	"	"	"	"	"	"	
Cold Vapor Extraction EPA 7470/7471									
Mercury	ND	0.10	mg/kg	1	6092608	09/26/06	09/29/06	EPA 7471A Soil	
Conventional Chemistry Parameters by APHA/EPA Methods									
pH	**7.2**		pH Units	1	6092703	09/27/06	09/29/06	EPA 9045B	

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PSI - Long Beach	Project: KEN-1	
3960 Gilman Street	Project Number: 559-6G017	**Reported:**
Long Beach CA, 90815	Project Manager: Eric Fraske	10/03/06 16:02

B8-5
T601317-10 (Soil)

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Not
SunStar Laboratories, Inc.									
Metals by EPA 6010B									
Antimony	ND	3.0	mg/kg	1	6092603	09/26/06	09/27/06	EPA 6010B	
Silver	ND	2.0	"	"	"	"	"	"	
Arsenic	ND	0.22	"	"	"	"	"	"	
Barium	**140**	1.0	"	"	"	"	"	"	
Beryllium	ND	1.0	"	"	"	"	09/27/06	"	
Cadmium	ND	1.6	"	"	"	"	09/27/06	"	
Chromium	**13**	2.0	"	"	"	"	"	"	
Cobalt	**9.2**	2.0	"	"	"	"	"	"	
Copper	**26**	1.0	"	"	"	"	"	"	
Lead	**5.7**	3.0	"	"	"	"	"	"	
Molybdenum	ND	1.0	"	"	"	"	"	"	
Nickel	**9.7**	2.0	"	"	"	"	"	"	
Selenium	ND	5.0	"	"	"	"	"	"	
Thallium	ND	2.0	"	"	"	"	"	"	
Vanadium	**31**	5.0	"	"	"	"	"	"	
Zinc	**42**	1.0	"	"	"	"	"	"	
Cold Vapor Extraction EPA 7470/7471									
Mercury	ND	0.10	mg/kg	1	6092608	09/26/06	09/29/06	EPA 7471A Soil	
Conventional Chemistry Parameters by APHA/EPA Methods									
pH	**7.3**		pH Units	1	6092703	09/27/06	09/29/06	EPA 9045B	

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PSI - Long Beach	Project: KEN-1	
3960 Gilman Street	Project Number: 559-6G017	**Reported:**
Long Beach CA, 90815	Project Manager: Eric Fraske	10/03/06 16:02

B8-10
T601317-11 (Soil)

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Not
SunStar Laboratories, Inc.									
Metals by EPA 6010B									
Antimony	ND	3.0	mg/kg	1	6092603	09/26/06	09/27/06	EPA 6010B	
Silver	ND	2.0	"	"	"	"	"	"	
Arsenic	ND	0.22	"	"	"	"	"	"	
Barium	**23**	1.0	"	"	"	"	"	"	
Beryllium	ND	1.0	"	"	"	"	09/27/06	"	
Cadmium	ND	1.6	"	"	"	"	09/27/06	"	
Chromium	**2.0**	2.0	"	"	"	"	"	"	
Cobalt	ND	2.0	"	"	"	"	"	"	
Copper	**2.3**	1.0	"	"	"	"	"	"	
Lead	ND	3.0	"	"	"	"	"	"	
Molybdenum	ND	1.0	"	"	"	"	"	"	
Nickel	ND	2.0	"	"	"	"	"	"	
Selenium	ND	5.0	"	"	"	"	"	"	
Thallium	ND	2.0	"	"	"	"	"	"	
Vanadium	**6.7**	5.0	"	"	"	"	"	"	
Zinc	**9.1**	1.0	"	"	"	"	"	"	
Cold Vapor Extraction EPA 7470/7471									
Mercury	ND	0.10	mg/kg	1	6092608	09/26/06	09/29/06	EPA 7471A Soil	
Conventional Chemistry Parameters by APHA/EPA Methods									
pH	**7.2**		pH Units	1	6092703	09/27/06	09/29/06	EPA 9045B	

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PSI - Long Beach	Project: KEN-1	
3960 Gilman Street	Project Number: 559-6G017	**Reported:**
Long Beach CA, 90815	Project Manager: Eric Fraske	10/03/06 16:02

B8-15
T601317-12 (Soil)

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Not
SunStar Laboratories, Inc.									
Metals by EPA 6010B									
Antimony	ND	3.0	mg/kg	1	6092603	09/26/06	09/27/06	EPA 6010B	
Silver	ND	2.0	"	"	"	"	09/27/06	"	
Arsenic	ND	0.22	"	"	"	"	09/27/06	"	
Barium	**30**	1.0	"	"	"	"	09/27/06	"	
Beryllium	ND	1.0	"	"	"	"	"	"	
Cadmium	ND	1.6	"	"	"	"	09/27/06	"	
Chromium	**2.9**	2.0	"	"	"	"	"	"	
Cobalt	**2.3**	2.0	"	"	"	"	"	"	
Copper	**1.3**	1.0	"	"	"	"	09/27/06	"	
Lead	ND	3.0	"	"	"	"	09/27/06	"	
Molybdenum	ND	1.0	"	"	"	"	"	"	
Nickel	ND	2.0	"	"	"	"	"	"	
Selenium	ND	5.0	"	"	"	"	"	"	
Thallium	ND	2.0	"	"	"	"	"	"	
Vanadium	**9.6**	5.0	"	"	"	"	09/27/06	"	
Zinc	**10**	1.0	"	"	"	"	09/27/06	"	
Cold Vapor Extraction EPA 7470/7471									
Mercury	ND	0.10	mg/kg	1	6092608	09/26/06	09/29/06	EPA 7471A Soil	
Conventional Chemistry Parameters by APHA/EPA Methods									
pH	**7.1**		pH Units	1	6092703	09/27/06	09/29/06	EPA 9045B	

SunStar Laboratories, Inc.

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PSI - Long Beach	Project: KEN-1	
3960 Gilman Street	Project Number: 559-6G017	**Reported:**
Long Beach CA, 90815	Project Manager: Eric Fraske	10/03/06 16:02

B12-1
T601317-13 (Soil)

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Not
			SunStar Laboratories, Inc.						
Metals by EPA 6010B									
Antimony	ND	3.0	mg/kg	1	6092603	09/26/06	09/28/06	EPA 6010B	
Silver	ND	2.0	"	"	"	"	"	"	
Arsenic	**2.6**	0.22	"	"	"	"	"	"	
Barium	**160**	1.0	"	"	"	"	"	"	
Beryllium	ND	1.0	"	"	"	"	"	"	
Cadmium	**1.9**	1.6	"	"	"	"	"	"	
Chromium	**18**	2.0	"	"	"	"	"	"	
Cobalt	**11**	2.0	"	"	"	"	"	"	
Copper	**33**	1.0	"	"	"	"	"	"	
Lead	**13**	3.0	"	"	"	"	"	"	
Molybdenum	ND	1.0	"	"	"	"	"	"	
Nickel	**13**	2.0	"	"	"	"	"	"	
Selenium	ND	5.0	"	"	"	"	"	"	
Thallium	ND	2.0	"	"	"	"	"	"	
Vanadium	**37**	5.0	"	"	"	"	"	"	
Zinc	**85**	1.0	"	"	"	"	"	"	
Cold Vapor Extraction EPA 7470/7471									
Mercury	**0.13**	0.10	mg/kg	1	6092608	09/26/06	09/29/06	EPA 7471A Soil	
Conventional Chemistry Parameters by APHA/EPA Methods									
pH	**6.7**		pH Units	1	6092703	09/27/06	09/29/06	EPA 9045B	

SunStar Laboratories, Inc.

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PSI - Long Beach	Project: KEN-1	
3960 Gilman Street	Project Number: 559-6G017	**Reported:**
Long Beach CA, 90815	Project Manager: Eric Fraske	10/03/06 16:02

B12-5
T601317-14 (Soil)

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Not
SunStar Laboratories, Inc.									
Metals by EPA 6010B									
Antimony	ND	3.0	mg/kg	1	6092603	09/26/06	09/28/06	EPA 6010B	
Silver	ND	2.0	"	"	"	"	"	"	
Arsenic	ND	0.22	"	"	"	"	"	"	
Barium	**220**	1.0	"	"	"	"	"	"	
Beryllium	ND	1.0	"	"	"	"	"	"	
Cadmium	ND	1.6	"	"	"	"	"	"	
Chromium	**24**	2.0	"	"	"	"	"	"	
Cobalt	**16**	2.0	"	"	"	"	"	"	
Copper	**30**	1.0	"	"	"	"	"	"	
Lead	**5.7**	3.0	"	"	"	"	"	"	
Molybdenum	ND	1.0	"	"	"	"	"	"	
Nickel	**18**	2.0	"	"	"	"	"	"	
Selenium	ND	5.0	"	"	"	"	"	"	
Thallium	ND	2.0	"	"	"	"	"	"	
Vanadium	**52**	5.0	"	"	"	"	"	"	
Zinc	**55**	1.0	"	"	"	"	"	"	
Cold Vapor Extraction EPA 7470/7471									
Mercury	ND	0.10	mg/kg	1	6092608	09/26/06	09/29/06	EPA 7471A Soil	
Conventional Chemistry Parameters by APHA/EPA Methods									
pH	**7.0**		pH Units	1	6092703	09/27/06	09/29/06	EPA 9045B	

SunStar Laboratories, Inc.

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PSI - Long Beach	Project: KEN-1	
3960 Gilman Street	Project Number: 559-6G017	**Reported:**
Long Beach CA, 90815	Project Manager: Eric Fraske	10/03/06 16:02

B12-10
T601317-15 (Soil)

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Not
SunStar Laboratories, Inc.									
Metals by EPA 6010B									
Antimony	ND	3.0	mg/kg	1	6092603	09/26/06	09/28/06	EPA 6010B	
Silver	ND	2.0	"	"	"	"	"	"	
Arsenic	ND	0.22	"	"	"	"	"	"	
Barium	**78**	1.0	"	"	"	"	"	"	
Beryllium	ND	1.0	"	"	"	"	"	"	
Cadmium	ND	1.6	"	"	"	"	"	"	
Chromium	**8.9**	2.0	"	"	"	"	"	"	
Cobalt	**6.0**	2.0	"	"	"	"	"	"	
Copper	**12**	1.0	"	"	"	"	"	"	
Lead	ND	3.0	"	"	"	"	"	"	
Molybdenum	ND	1.0	"	"	"	"	"	"	
Nickel	**4.4**	2.0	"	"	"	"	"	"	
Selenium	ND	5.0	"	"	"	"	"	"	
Thallium	ND	2.0	"	"	"	"	"	"	
Vanadium	**21**	5.0	"	"	"	"	"	"	
Zinc	**29**	1.0	"	"	"	"	"	"	
Cold Vapor Extraction EPA 7470/7471									
Mercury	ND	0.10	mg/kg	1	6092608	09/26/06	09/29/06	EPA 7471A Soil	
Conventional Chemistry Parameters by APHA/EPA Methods									
pH	**7.2**		pH Units	1	6092703	09/27/06	09/29/06	EPA 9045B	

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PSI - Long Beach	Project: KEN-1	
3960 Gilman Street	Project Number: 559-6G017	**Reported:**
Long Beach CA, 90815	Project Manager: Eric Fraske	10/03/06 16:02

B12-15
T601317-16 (Soil)

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Not
SunStar Laboratories, Inc.									
Metals by EPA 6010B									
Antimony	ND	3.0	mg/kg	1	6092603	09/26/06	09/28/06	EPA 6010B	
Silver	ND	2.0	"	"	"	"	"	"	
Arsenic	ND	0.22	"	"	"	"	"	"	
Barium	**53**	1.0	"	"	"	"	"	"	
Beryllium	ND	1.0	"	"	"	"	"	"	
Cadmium	ND	1.6	"	"	"	"	"	"	
Chromium	**3.7**	2.0	"	"	"	"	"	"	
Cobalt	**4.2**	2.0	"	"	"	"	"	"	
Copper	**4.7**	1.0	"	"	"	"	"	"	
Lead	ND	3.0	"	"	"	"	"	"	
Molybdenum	ND	1.0	"	"	"	"	"	"	
Nickel	**2.6**	2.0	"	"	"	"	"	"	
Selenium	ND	5.0	"	"	"	"	"	"	
Thallium	ND	2.0	"	"	"	"	"	"	
Vanadium	**14**	5.0	"	"	"	"	"	"	
Zinc	**21**	1.0	"	"	"	"	"	"	
Cold Vapor Extraction EPA 7470/7471									
Mercury	ND	0.10	mg/kg	1	6092608	09/26/06	09/29/06	EPA 7471A Soil	
Conventional Chemistry Parameters by APHA/EPA Methods									
pH	**7.6**		pH Units	1	6092703	09/27/06	09/29/06	EPA 9045B	

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PSI - Long Beach	Project: KEN-1	
3960 Gilman Street	Project Number: 559-6G017	**Reported:**
Long Beach CA, 90815	Project Manager: Eric Fraske	10/03/06 16:02

B7-1
T601317-17 (Soil)

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Not
SunStar Laboratories, Inc.									
Metals by EPA 6010B									
Antimony	ND	3.0	mg/kg	1	6092603	09/26/06	09/28/06	EPA 6010B	
Silver	ND	2.0	"	"	"	"	"	"	
Arsenic	ND	0.22	"	"	"	"	"	"	
Barium	**150**	1.0	"	"	"	"	"	"	
Beryllium	ND	1.0	"	"	"	"	09/28/06	"	
Cadmium	ND	1.6	"	"	"	"	09/28/06	"	
Chromium	**14**	2.0	"	"	"	"	"	"	
Cobalt	**9.7**	2.0	"	"	"	"	"	"	
Copper	**23**	1.0	"	"	"	"	"	"	
Lead	**4.0**	3.0	"	"	"	"	"	"	
Molybdenum	ND	1.0	"	"	"	"	"	"	
Nickel	**10**	2.0	"	"	"	"	"	"	
Selenium	ND	5.0	"	"	"	"	"	"	
Thallium	ND	2.0	"	"	"	"	"	"	
Vanadium	**33**	5.0	"	"	"	"	"	"	
Zinc	**43**	1.0	"	"	"	"	"	"	
Cold Vapor Extraction EPA 7470/7471									
Mercury	ND	0.10	mg/kg	1	6092608	09/26/06	09/29/06	EPA 7471A Soil	
Conventional Chemistry Parameters by APHA/EPA Methods									
pH	**7.4**		pH Units	1	6092703	09/27/06	09/29/06	EPA 9045B	



PSI - Long Beach	Project: KEN-1	
3960 Gilman Street	Project Number: 559-6G017	**Reported:**
Long Beach CA, 90815	Project Manager: Eric Fraske	10/03/06 16:02

B7-5
T601317-18 (Soil)

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Not
SunStar Laboratories, Inc.									
Metals by EPA 6010B									
Antimony	ND	3.0	mg/kg	1	6092603	09/26/06	09/28/06	EPA 6010B	
Silver	ND	2.0	"	"	"	"	"	"	
Arsenic	ND	0.22	"	"	"	"	"	"	
Barium	**140**	1.0	"	"	"	"	"	"	
Beryllium	ND	1.0	"	"	"	"	09/28/06	"	
Cadmium	ND	1.6	"	"	"	"	09/28/06	"	
Chromium	**16**	2.0	"	"	"	"	"	"	
Cobalt	**10**	2.0	"	"	"	"	"	"	
Copper	**14**	1.0	"	"	"	"	"	"	
Lead	ND	3.0	"	"	"	"	"	"	
Molybdenum	ND	1.0	"	"	"	"	"	"	
Nickel	**11**	2.0	"	"	"	"	"	"	
Selenium	ND	5.0	"	"	"	"	"	"	
Thallium	ND	2.0	"	"	"	"	"	"	
Vanadium	**38**	5.0	"	"	"	"	"	"	
Zinc	**43**	1.0	"	"	"	"	"	"	
Cold Vapor Extraction EPA 7470/7471									
Mercury	ND	0.10	mg/kg	1	6092608	09/26/06	09/29/06	EPA 7471A Soil	
Conventional Chemistry Parameters by APHA/EPA Methods									
pH	**7.4**		pH Units	1	6092703	09/27/06	09/29/06	EPA 9045B	

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PSI - Long Beach	Project: KEN-1	
3960 Gilman Street	Project Number: 559-6G017	**Reported:**
Long Beach CA, 90815	Project Manager: Eric Fraske	10/03/06 16:02

B7-10
T601317-19 (Soil)

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Not
SunStar Laboratories, Inc.									
Metals by EPA 6010B									
Antimony	ND	3.0	mg/kg	1	6092603	09/26/06	09/28/06	EPA 6010B	
Silver	ND	2.0	"	"	"	"	"	"	
Arsenic	ND	0.22	"	"	"	"	"	"	
Barium	**42**	1.0	"	"	"	"	"	"	
Beryllium	ND	1.0	"	"	"	"	09/28/06	"	
Cadmium	ND	1.6	"	"	"	"	09/28/06	"	
Chromium	**3.5**	2.0	"	"	"	"	"	"	
Cobalt	**3.8**	2.0	"	"	"	"	"	"	
Copper	**1.7**	1.0	"	"	"	"	"	"	
Lead	ND	3.0	"	"	"	"	"	"	
Molybdenum	ND	1.0	"	"	"	"	"	"	
Nickel	**2.4**	2.0	"	"	"	"	"	"	
Selenium	ND	5.0	"	"	"	"	"	"	
Thallium	ND	2.0	"	"	"	"	"	"	
Vanadium	**14**	5.0	"	"	"	"	"	"	
Zinc	**16**	1.0	"	"	"	"	"	"	
Cold Vapor Extraction EPA 7470/7471									
Mercury	ND	0.10	mg/kg	1	6092608	09/26/06	09/29/06	EPA 7471A Soil	
Conventional Chemistry Parameters by APHA/EPA Methods									
pH	**7.6**		pH Units	1	6092703	09/27/06	09/29/06	EPA 9045B	

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PSI - Long Beach	Project: KEN-1	
3960 Gilman Street	Project Number: 559-6G017	**Reported:**
Long Beach CA, 90815	Project Manager: Eric Fraske	10/03/06 16:02

B7-15
T601317-20 (Soil)

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Not
SunStar Laboratories, Inc.									
Metals by EPA 6010B									
Antimony	ND	3.0	mg/kg	1	6092604	09/26/06	09/28/06	EPA 6010B	
Silver	ND	2.0	"	"	"	"	"	"	
Arsenic	ND	0.22	"	"	"	"	"	"	
Barium	**43**	1.0	"	"	"	"	"	"	
Beryllium	ND	1.0	"	"	"	"	"	"	
Cadmium	ND	1.6	"	"	"	"	"	"	
Chromium	**4.6**	2.0	"	"	"	"	"	"	
Cobalt	**3.4**	2.0	"	"	"	"	"	"	
Copper	**5.5**	1.0	"	"	"	"	"	"	
Lead	ND	3.0	"	"	"	"	"	"	
Molybdenum	ND	1.0	"	"	"	"	"	"	
Nickel	**2.5**	2.0	"	"	"	"	"	"	
Selenium	ND	5.0	"	"	"	"	"	"	
Thallium	ND	2.0	"	"	"	"	"	"	
Vanadium	**12**	5.0	"	"	"	"	"	"	
Zinc	**14**	1.0	"	"	"	"	"	"	
Cold Vapor Extraction EPA 7470/7471									
Mercury	ND	0.10	mg/kg	1	6092609	09/26/06	10/03/06	EPA 7471A Soil	
Conventional Chemistry Parameters by APHA/EPA Methods									
pH	**8.0**		pH Units	1	6092703	09/27/06	09/29/06	EPA 9045B	

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PSI - Long Beach	Project: KEN-1	
3960 Gilman Street	Project Number: 559-6G017	**Reported:**
Long Beach CA, 90815	Project Manager: Eric Fraske	10/03/06 16:02

B11-1
T601317-21 (Soil)

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Not
SunStar Laboratories, Inc.									
Metals by EPA 6010B									
Antimony	ND	3.0	mg/kg	1	6092604	09/26/06	09/28/06	EPA 6010B	
Silver	ND	2.0	"	"	"	"	"	"	
Arsenic	ND	0.22	"	"	"	"	"	"	
Barium	**170**	1.0	"	"	"	"	"	"	
Beryllium	ND	1.0	"	"	"	"	"	"	
Cadmium	ND	1.6	"	"	"	"	"	"	
Chromium	**18**	2.0	"	"	"	"	"	"	
Cobalt	**11**	2.0	"	"	"	"	"	"	
Copper	**24**	1.0	"	"	"	"	"	"	
Lead	**230**	3.0	"	"	"	"	"	"	
Molybdenum	ND	1.0	"	"	"	"	"	"	
Nickel	**13**	2.0	"	"	"	"	"	"	
Selenium	ND	5.0	"	"	"	"	"	"	
Thallium	ND	2.0	"	"	"	"	"	"	
Vanadium	**41**	5.0	"	"	"	"	"	"	
Zinc	**82**	1.0	"	"	"	"	"	"	
Cold Vapor Extraction EPA 7470/7471									
Mercury	**0.11**	0.10	mg/kg	1	6092609	09/26/06	10/03/06	EPA 7471A Soil	
Conventional Chemistry Parameters by APHA/EPA Methods									
pH	**7.3**		pH Units	1	6092704	09/27/06	09/29/06	EPA 9045B	

PSI - Long Beach	Project: KEN-1	
3960 Gilman Street	Project Number: 559-6G017	**Reported:**
Long Beach CA, 90815	Project Manager: Eric Fraske	10/03/06 16:02

B11-5
T601317-22 (Soil)

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Not
SunStar Laboratories, Inc.									
Metals by EPA 6010B									
Antimony	ND	3.0	mg/kg	1	6092604	09/26/06	09/28/06	EPA 6010B	
Silver	ND	2.0	"	"	"	"	"	"	
Arsenic	ND	0.22	"	"	"	"	"	"	
Barium	**190**	1.0	"	"	"	"	"	"	
Beryllium	ND	1.0	"	"	"	"	09/28/06	"	
Cadmium	ND	1.6	"	"	"	"	09/28/06	"	
Chromium	**22**	2.0	"	"	"	"	"	"	
Cobalt	**13**	2.0	"	"	"	"	"	"	
Copper	**27**	1.0	"	"	"	"	"	"	
Lead	**10**	3.0	"	"	"	"	"	"	
Molybdenum	ND	1.0	"	"	"	"	"	"	
Nickel	**15**	2.0	"	"	"	"	"	"	
Selenium	ND	5.0	"	"	"	"	"	"	
Thallium	ND	2.0	"	"	"	"	"	"	
Vanadium	**46**	5.0	"	"	"	"	"	"	
Zinc	**60**	1.0	"	"	"	"	"	"	
Cold Vapor Extraction EPA 7470/7471									
Mercury	ND	0.10	mg/kg	1	6092609	09/26/06	10/03/06	EPA 7471A Soil	
Conventional Chemistry Parameters by APHA/EPA Methods									
pH	**7.3**		pH Units	1	6092704	09/27/06	09/29/06	EPA 9045B	

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PSI - Long Beach	Project: KEN-1	
3960 Gilman Street	Project Number: 559-6G017	**Reported:**
Long Beach CA, 90815	Project Manager: Eric Fraske	10/03/06 16:02

B11-10
T601317-23 (Soil)

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Not
SunStar Laboratories, Inc.									
Metals by EPA 6010B									
Antimony	ND	3.0	mg/kg	1	6092604	09/26/06	09/28/06	EPA 6010B	
Silver	ND	2.0	"	"	"	"	"	"	
Arsenic	ND	0.22	"	"	"	"	"	"	
Barium	**130**	1.0	"	"	"	"	"	"	
Beryllium	ND	1.0	"	"	"	"	09/28/06	"	
Cadmium	ND	1.6	"	"	"	"	09/28/06	"	
Chromium	**15**	2.0	"	"	"	"	"	"	
Cobalt	**9.9**	2.0	"	"	"	"	"	"	
Copper	**14**	1.0	"	"	"	"	"	"	
Lead	ND	3.0	"	"	"	"	"	"	
Molybdenum	ND	1.0	"	"	"	"	"	"	
Nickel	**9.4**	2.0	"	"	"	"	"	"	
Selenium	ND	5.0	"	"	"	"	"	"	
Thallium	ND	2.0	"	"	"	"	"	"	
Vanadium	**35**	5.0	"	"	"	"	"	"	
Zinc	**36**	1.0	"	"	"	"	"	"	
Cold Vapor Extraction EPA 7470/7471									
Mercury	ND	0.10	mg/kg	1	6092609	09/26/06	10/03/06	EPA 7471A Soil	
Conventional Chemistry Parameters by APHA/EPA Methods									
pH	**7.6**		pH Units	1	6092704	09/27/06	09/29/06	EPA 9045B	

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John J. Light

PSI - Long Beach	Project: KEN-1	
3960 Gilman Street	Project Number: 559-6G017	**Reported:**
Long Beach CA, 90815	Project Manager: Eric Fraske	10/03/06 16:02

B11-15
T601317-24 (Soil)

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Not
SunStar Laboratories, Inc.									
Metals by EPA 6010B									
Antimony	ND	3.0	mg/kg	1	6092604	09/26/06	09/28/06	EPA 6010B	
Silver	ND	2.0	"	"	"	"	"	"	
Arsenic	ND	0.22	"	"	"	"	"	"	
Barium	**38**	1.0	"	"	"	"	"	"	
Beryllium	ND	1.0	"	"	"	"	"	"	
Cadmium	ND	1.6	"	"	"	"	"	"	
Chromium	**2.5**	2.0	"	"	"	"	"	"	
Cobalt	**2.5**	2.0	"	"	"	"	"	"	
Copper	**7.9**	1.0	"	"	"	"	"	"	
Lead	ND	3.0	"	"	"	"	"	"	
Molybdenum	ND	1.0	"	"	"	"	"	"	
Nickel	**2.3**	2.0	"	"	"	"	"	"	
Selenium	ND	5.0	"	"	"	"	"	"	
Thallium	ND	2.0	"	"	"	"	"	"	
Vanadium	**9.3**	5.0	"	"	"	"	"	"	
Zinc	**13**	1.0	"	"	"	"	"	"	
Cold Vapor Extraction EPA 7470/7471									
Mercury	**0.51**	0.10	mg/kg	1	6092609	09/26/06	10/03/06	EPA 7471A Soil	
Conventional Chemistry Parameters by APHA/EPA Methods									
pH	**7.9**		pH Units	1	6092704	09/27/06	09/29/06	EPA 9045B	

SunStar Laboratories, Inc.

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PSI - Long Beach	Project: KEN-1	
3960 Gilman Street	Project Number: 559-6G017	**Reported:**
Long Beach CA, 90815	Project Manager: Eric Fraske	10/03/06 16:02

B16-1
T601317-25 (Soil)

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Not
SunStar Laboratories, Inc.									
Metals by EPA 6010B									
Antimony	ND	3.0	mg/kg	1	6092604	09/26/06	09/28/06	EPA 6010B	
Silver	ND	2.0	"	"	"	"	"	"	
Arsenic	ND	0.22	"	"	"	"	"	"	
Barium	**190**	1.0	"	"	"	"	"	"	
Beryllium	ND	1.0	"	"	"	"	"	"	
Cadmium	**1.7**	1.6	"	"	"	"	"	"	
Chromium	**22**	2.0	"	"	"	"	"	"	
Cobalt	**14**	2.0	"	"	"	"	"	"	
Copper	**81**	1.0	"	"	"	"	"	"	
Lead	**57**	3.0	"	"	"	"	"	"	
Molybdenum	ND	1.0	"	"	"	"	"	"	
Nickel	**17**	2.0	"	"	"	"	"	"	
Selenium	ND	5.0	"	"	"	"	"	"	
Thallium	ND	2.0	"	"	"	"	"	"	
Vanadium	**47**	5.0	"	"	"	"	"	"	
Zinc	**230**	1.0	"	"	"	"	"	"	
Cold Vapor Extraction EPA 7470/7471									
Mercury	ND	0.10	mg/kg	1	6092609	09/26/06	10/03/06	EPA 7471A Soil	
Conventional Chemistry Parameters by APHA/EPA Methods									
pH	**7.4**		pH Units	1	6092704	09/27/06	09/29/06	EPA 9045B	

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John J. Hyl

PSI - Long Beach	Project: KEN-1	
3960 Gilman Street	Project Number: 559-6G017	**Reported:**
Long Beach CA, 90815	Project Manager: Eric Fraske	10/03/06 16:02

B16-5
T601317-26 (Soil)

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Not
SunStar Laboratories, Inc.									
Metals by EPA 6010B									
Antimony	ND	3.0	mg/kg	1	6092604	09/26/06	09/28/06	EPA 6010B	
Silver	ND	2.0	"	"	"	"	"	"	
Arsenic	ND	0.22	"	"	"	"	"	"	
Barium	**170**	1.0	"	"	"	"	"	"	
Beryllium	ND	1.0	"	"	"	"	"	"	
Cadmium	ND	1.6	"	"	"	"	"	"	
Chromium	**18**	2.0	"	"	"	"	"	"	
Cobalt	**12**	2.0	"	"	"	"	"	"	
Copper	**20**	1.0	"	"	"	"	"	"	
Lead	ND	3.0	"	"	"	"	"	"	
Molybdenum	ND	1.0	"	"	"	"	"	"	
Nickel	**13**	2.0	"	"	"	"	"	"	
Selenium	ND	5.0	"	"	"	"	"	"	
Thallium	ND	2.0	"	"	"	"	"	"	
Vanadium	**39**	5.0	"	"	"	"	"	"	
Zinc	**44**	1.0	"	"	"	"	"	"	
Cold Vapor Extraction EPA 7470/7471									
Mercury	**0.11**	0.10	mg/kg	1	6092609	09/26/06	10/03/06	EPA 7471A Soil	
Conventional Chemistry Parameters by APHA/EPA Methods									
pH	**7.3**		pH Units	1	6092704	09/27/06	09/29/06	EPA 9045B	

PSI - Long Beach	Project: KEN-1	
3960 Gilman Street	Project Number: 559-6G017	**Reported:**
Long Beach CA, 90815	Project Manager: Eric Fraske	10/03/06 16:02

B16-10
T601317-27 (Soil)

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Not
SunStar Laboratories, Inc.									
Metals by EPA 6010B									
Antimony	ND	3.0	mg/kg	1	6092604	09/26/06	09/28/06	EPA 6010B	
Silver	ND	2.0	"	"	"	"	"	"	
Arsenic	ND	0.22	"	"	"	"	"	"	
Barium	**44**	1.0	"	"	"	"	"	"	
Beryllium	ND	1.0	"	"	"	"	"	"	
Cadmium	ND	1.6	"	"	"	"	"	"	
Chromium	**4.6**	2.0	"	"	"	"	"	"	
Cobalt	**3.6**	2.0	"	"	"	"	"	"	
Copper	**6.2**	1.0	"	"	"	"	"	"	
Lead	ND	3.0	"	"	"	"	"	"	
Molybdenum	ND	1.0	"	"	"	"	"	"	
Nickel	**3.0**	2.0	"	"	"	"	"	"	
Selenium	ND	5.0	"	"	"	"	"	"	
Thallium	ND	2.0	"	"	"	"	"	"	
Vanadium	**13**	5.0	"	"	"	"	"	"	
Zinc	**16**	1.0	"	"	"	"	"	"	
Cold Vapor Extraction EPA 7470/7471									
Mercury	ND	0.10	mg/kg	1	6092609	09/26/06	10/03/06	EPA 7471A Soil	
Conventional Chemistry Parameters by APHA/EPA Methods									
pH	**7.4**		pH Units	1	6092704	09/27/06	09/29/06	EPA 9045B	

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John J. Hyl

PSI - Long Beach	Project: KEN-1	
3960 Gilman Street	Project Number: 559-6G017	**Reported:**
Long Beach CA, 90815	Project Manager: Eric Fraske	10/03/06 16:02

B16-15
T601317-28 (Soil)

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Not
SunStar Laboratories, Inc.									
Metals by EPA 6010B									
Antimony	ND	3.0	mg/kg	1	6092604	09/26/06	09/28/06	EPA 6010B	
Silver	ND	2.0	"	"	"	"	"	"	
Arsenic	ND	0.22	"	"	"	"	"	"	
Barium	**46**	1.0	"	"	"	"	"	"	
Beryllium	ND	1.0	"	"	"	"	09/28/06	"	
Cadmium	ND	1.6	"	"	"	"	09/28/06	"	
Chromium	**5.2**	2.0	"	"	"	"	"	"	
Cobalt	**4.2**	2.0	"	"	"	"	"	"	
Copper	**20**	1.0	"	"	"	"	"	"	
Lead	ND	3.0	"	"	"	"	"	"	
Molybdenum	ND	1.0	"	"	"	"	"	"	
Nickel	**3.3**	2.0	"	"	"	"	"	"	
Selenium	ND	5.0	"	"	"	"	"	"	
Thallium	ND	2.0	"	"	"	"	"	"	
Vanadium	**15**	5.0	"	"	"	"	"	"	
Zinc	**23**	1.0	"	"	"	"	"	"	
Cold Vapor Extraction EPA 7470/7471									
Mercury	ND	0.10	mg/kg	1	6092609	09/26/06	10/03/06	EPA 7471A Soil	
Conventional Chemistry Parameters by APHA/EPA Methods									
pH	**7.6**		pH Units	1	6092704	09/27/06	09/29/06	EPA 9045B	

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PSI - Long Beach	Project: KEN-1	
3960 Gilman Street	Project Number: 559-6G017	**Reported:**
Long Beach CA, 90815	Project Manager: Eric Fraske	10/03/06 16:02

B17-1
T601317-29 (Soil)

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Not
SunStar Laboratories, Inc.									
Metals by EPA 6010B									
Antimony	ND	3.0	mg/kg	1	6092604	09/26/06	09/28/06	EPA 6010B	
Silver	ND	2.0	"	"	"	"	"	"	
Arsenic	ND	0.22	"	"	"	"	"	"	
Barium	**140**	1.0	"	"	"	"	"	"	
Beryllium	ND	1.0	"	"	"	"	"	"	
Cadmium	ND	1.6	"	"	"	"	"	"	
Chromium	**16**	2.0	"	"	"	"	"	"	
Cobalt	**10**	2.0	"	"	"	"	"	"	
Copper	**22**	1.0	"	"	"	"	"	"	
Lead	**4.5**	3.0	"	"	"	"	"	"	
Molybdenum	ND	1.0	"	"	"	"	"	"	
Nickel	**11**	2.0	"	"	"	"	"	"	
Selenium	ND	5.0	"	"	"	"	"	"	
Thallium	ND	2.0	"	"	"	"	"	"	
Vanadium	**35**	5.0	"	"	"	"	"	"	
Zinc	**50**	1.0	"	"	"	"	"	"	
Cold Vapor Extraction EPA 7470/7471									
Mercury	ND	0.10	mg/kg	1	6092609	09/26/06	10/03/06	EPA 7471A Soil	
Conventional Chemistry Parameters by APHA/EPA Methods									
pH	**7.3**		pH Units	1	6092704	09/27/06	09/29/06	EPA 9045B	

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John J. Phillips

PSI - Long Beach	Project: KEN-1	
3960 Gilman Street	Project Number: 559-6G017	**Reported:**
Long Beach CA, 90815	Project Manager: Eric Fraske	10/03/06 16:02

B17-5
T601317-30 (Soil)

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Not
SunStar Laboratories, Inc.									
Metals by EPA 6010B									
Antimony	ND	3.0	mg/kg	1	6092604	09/26/06	09/28/06	EPA 6010B	
Silver	ND	2.0	"	"	"	"	"	"	
Arsenic	ND	0.22	"	"	"	"	"	"	
Barium	**110**	1.0	"	"	"	"	"	"	
Beryllium	ND	1.0	"	"	"	"	"	"	
Cadmium	ND	1.6	"	"	"	"	"	"	
Chromium	**12**	2.0	"	"	"	"	"	"	
Cobalt	**8.6**	2.0	"	"	"	"	"	"	
Copper	**14**	1.0	"	"	"	"	"	"	
Lead	ND	3.0	"	"	"	"	"	"	
Molybdenum	ND	1.0	"	"	"	"	"	"	
Nickel	**8.7**	2.0	"	"	"	"	"	"	
Selenium	ND	5.0	"	"	"	"	"	"	
Thallium	ND	2.0	"	"	"	"	"	"	
Vanadium	**29**	5.0	"	"	"	"	"	"	
Zinc	**33**	1.0	"	"	"	"	"	"	
Cold Vapor Extraction EPA 7470/7471									
Mercury	ND	0.10	mg/kg	1	6092609	09/26/06	10/03/06	EPA 7471A Soil	
Conventional Chemistry Parameters by APHA/EPA Methods									
pH	**7.6**		pH Units	1	6092704	09/27/06	09/29/06	EPA 9045B	

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John J. Light

PSI - Long Beach	Project: KEN-1	
3960 Gilman Street	Project Number: 559-6G017	**Reported:**
Long Beach CA, 90815	Project Manager: Eric Fraske	10/03/06 16:02

B17-10
T601317-31 (Soil)

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Not
SunStar Laboratories, Inc.									
Metals by EPA 6010B									
Antimony	ND	3.0	mg/kg	1	6092604	09/26/06	09/28/06	EPA 6010B	
Silver	ND	2.0	"	"	"	"	"	"	
Arsenic	ND	0.22	"	"	"	"	"	"	
Barium	**49**	1.0	"	"	"	"	"	"	
Beryllium	ND	1.0	"	"	"	"	"	"	
Cadmium	ND	1.6	"	"	"	"	"	"	
Chromium	**6.3**	2.0	"	"	"	"	"	"	
Cobalt	**4.4**	2.0	"	"	"	"	"	"	
Copper	**9.3**	1.0	"	"	"	"	"	"	
Lead	ND	3.0	"	"	"	"	"	"	
Molybdenum	ND	1.0	"	"	"	"	"	"	
Nickel	**4.3**	2.0	"	"	"	"	"	"	
Selenium	ND	5.0	"	"	"	"	"	"	
Thallium	ND	2.0	"	"	"	"	"	"	
Vanadium	**18**	5.0	"	"	"	"	"	"	
Zinc	**20**	1.0	"	"	"	"	"	"	
Cold Vapor Extraction EPA 7470/7471									
Mercury	ND	0.10	mg/kg	1	6092609	09/26/06	10/03/06	EPA 7471A Soil	
Conventional Chemistry Parameters by APHA/EPA Methods									
pH	**7.5**		pH Units	1	6092704	09/27/06	09/29/06	EPA 9045B	

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John J. Light

PSI - Long Beach	Project: KEN-1	
3960 Gilman Street	Project Number: 559-6G017	**Reported:**
Long Beach CA, 90815	Project Manager: Eric Fraske	10/03/06 16:02

B17-15
T601317-32 (Soil)

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Not
SunStar Laboratories, Inc.									
Metals by EPA 6010B									
Antimony	ND	3.0	mg/kg	1	6092604	09/26/06	09/28/06	EPA 6010B	
Silver	ND	2.0	"	"	"	"	"	"	
Arsenic	ND	0.22	"	"	"	"	"	"	
Barium	**62**	1.0	"	"	"	"	"	"	
Beryllium	ND	1.0	"	"	"	"	09/28/06	"	
Cadmium	ND	1.6	"	"	"	"	09/28/06	"	
Chromium	**5.4**	2.0	"	"	"	"	"	"	
Cobalt	**4.9**	2.0	"	"	"	"	"	"	
Copper	**7.6**	1.0	"	"	"	"	"	"	
Lead	ND	3.0	"	"	"	"	"	"	
Molybdenum	ND	1.0	"	"	"	"	"	"	
Nickel	**4.5**	2.0	"	"	"	"	"	"	
Selenium	ND	5.0	"	"	"	"	"	"	
Thallium	ND	2.0	"	"	"	"	"	"	
Vanadium	**15**	5.0	"	"	"	"	"	"	
Zinc	**21**	1.0	"	"	"	"	"	"	
Cold Vapor Extraction EPA 7470/7471									
Mercury	ND	0.10	mg/kg	1	6092609	09/26/06	10/03/06	EPA 7471A Soil	
Conventional Chemistry Parameters by APHA/EPA Methods									
pH	**7.8**		pH Units	1	6092704	09/27/06	09/29/06	EPA 9045B	

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John J. Kelly

PSI - Long Beach	Project: KEN-1	
3960 Gilman Street	Project Number: 559-6G017	**Reported:**
Long Beach CA, 90815	Project Manager: Eric Fraske	10/03/06 16:02

B18-1
T601317-33 (Soil)

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Not
SunStar Laboratories, Inc.									
Metals by EPA 6010B									
Antimony	ND	3.0	mg/kg	1	6092604	09/26/06	09/28/06	EPA 6010B	
Silver	ND	2.0	"	"	"	"	09/28/06	"	
Arsenic	**6.9**	0.22	"	"	"	"	09/28/06	"	
Barium	**160**	1.0	"	"	"	"	09/28/06	"	
Beryllium	ND	1.0	"	"	"	"	"	"	
Cadmium	**1.6**	1.6	"	"	"	"	09/28/06	"	
Chromium	**14**	2.0	"	"	"	"	"	"	
Cobalt	**7.0**	2.0	"	"	"	"	"	"	
Copper	**93**	1.0	"	"	"	"	09/28/06	"	
Lead	**310**	3.0	"	"	"	"	09/28/06	"	
Molybdenum	ND	1.0	"	"	"	"	"	"	
Nickel	**12**	2.0	"	"	"	"	"	"	
Selenium	ND	5.0	"	"	"	"	"	"	
Thallium	ND	2.0	"	"	"	"	"	"	
Vanadium	**24**	5.0	"	"	"	"	09/28/06	"	
Zinc	**220**	1.0	"	"	"	"	"	"	
Cold Vapor Extraction EPA 7470/7471									
Mercury	**0.17**	0.10	mg/kg	1	6092609	09/26/06	10/03/06	EPA 7471A Soil	
Conventional Chemistry Parameters by APHA/EPA Methods									
pH	**7.0**		pH Units	1	6092704	09/27/06	09/29/06	EPA 9045B	

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John J. Kelly

PSI - Long Beach	Project: KEN-1	
3960 Gilman Street	Project Number: 559-6G017	**Reported:**
Long Beach CA, 90815	Project Manager: Eric Fraske	10/03/06 16:02

B18-5
T601317-34 (Soil)

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Not
SunStar Laboratories, Inc.									
Metals by EPA 6010B									
Antimony	ND	3.0	mg/kg	1	6092604	09/26/06	09/28/06	EPA 6010B	
Silver	ND	2.0	"	"	"	"	"	"	
Arsenic	ND	0.22	"	"	"	"	"	"	
Barium	**110**	1.0	"	"	"	"	"	"	
Beryllium	ND	1.0	"	"	"	"	"	"	
Cadmium	ND	1.6	"	"	"	"	"	"	
Chromium	**11**	2.0	"	"	"	"	"	"	
Cobalt	**7.8**	2.0	"	"	"	"	"	"	
Copper	**11**	1.0	"	"	"	"	"	"	
Lead	ND	3.0	"	"	"	"	"	"	
Molybdenum	ND	1.0	"	"	"	"	"	"	
Nickel	**7.2**	2.0	"	"	"	"	"	"	
Selenium	ND	5.0	"	"	"	"	"	"	
Thallium	ND	2.0	"	"	"	"	"	"	
Vanadium	**26**	5.0	"	"	"	"	"	"	
Zinc	**30**	1.0	"	"	"	"	"	"	
Cold Vapor Extraction EPA 7470/7471									
Mercury	ND	0.10	mg/kg	1	6092609	09/26/06	10/03/06	EPA 7471A Soil	
Conventional Chemistry Parameters by APHA/EPA Methods									
pH	**7.4**		pH Units	1	6092704	09/27/06	09/29/06	EPA 9045B	

PSI - Long Beach	Project: KEN-1	
3960 Gilman Street	Project Number: 559-6G017	**Reported:**
Long Beach CA, 90815	Project Manager: Eric Fraske	10/03/06 16:02

B18-10
T601317-35 (Soil)

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Not
SunStar Laboratories, Inc.									
Metals by EPA 6010B									
Antimony	ND	3.0	mg/kg	1	6092604	09/26/06	09/28/06	EPA 6010B	
Silver	ND	2.0	"	"	"	"	"	"	
Arsenic	ND	0.22	"	"	"	"	"	"	
Barium	**73**	1.0	"	"	"	"	"	"	
Beryllium	ND	1.0	"	"	"	"	"	"	
Cadmium	ND	1.6	"	"	"	"	"	"	
Chromium	**9.0**	2.0	"	"	"	"	"	"	
Cobalt	**5.5**	2.0	"	"	"	"	"	"	
Copper	**12**	1.0	"	"	"	"	"	"	
Lead	ND	3.0	"	"	"	"	"	"	
Molybdenum	ND	1.0	"	"	"	"	"	"	
Nickel	**6.0**	2.0	"	"	"	"	"	"	
Selenium	ND	5.0	"	"	"	"	"	"	
Thallium	ND	2.0	"	"	"	"	"	"	
Vanadium	**19**	5.0	"	"	"	"	"	"	
Zinc	**24**	1.0	"	"	"	"	"	"	
Cold Vapor Extraction EPA 7470/7471									
Mercury	ND	0.10	mg/kg	1	6092609	09/26/06	10/03/06	EPA 7471A Soil	
Conventional Chemistry Parameters by APHA/EPA Methods									
pH	**7.2**		pH Units	1	6092704	09/27/06	09/29/06	EPA 9045B	

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John J. Light

PSI - Long Beach	Project: KEN-1	
3960 Gilman Street	Project Number: 559-6G017	**Reported:**
Long Beach CA, 90815	Project Manager: Eric Fraske	10/03/06 16:02

B18-15
T601317-36 (Soil)

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Not
SunStar Laboratories, Inc.									
Metals by EPA 6010B									
Antimony	ND	3.0	mg/kg	1	6092604	09/26/06	09/28/06	EPA 6010B	
Silver	ND	2.0	"	"	"	"	"	"	
Arsenic	ND	0.22	"	"	"	"	"	"	
Barium	**42**	1.0	"	"	"	"	"	"	
Beryllium	ND	1.0	"	"	"	"	"	"	
Cadmium	ND	1.6	"	"	"	"	"	"	
Chromium	**3.1**	2.0	"	"	"	"	"	"	
Cobalt	**3.6**	2.0	"	"	"	"	"	"	
Copper	**2.0**	1.0	"	"	"	"	"	"	
Lead	ND	3.0	"	"	"	"	"	"	
Molybdenum	ND	1.0	"	"	"	"	"	"	
Nickel	**2.5**	2.0	"	"	"	"	"	"	
Selenium	ND	5.0	"	"	"	"	"	"	
Thallium	ND	2.0	"	"	"	"	"	"	
Vanadium	**12**	5.0	"	"	"	"	"	"	
Zinc	**14**	1.0	"	"	"	"	"	"	
Cold Vapor Extraction EPA 7470/7471									
Mercury	ND	0.10	mg/kg	1	6092609	09/26/06	10/03/06	EPA 7471A Soil	
Conventional Chemistry Parameters by APHA/EPA Methods									
pH	**7.8**		pH Units	1	6092704	09/27/06	09/29/06	EPA 9045B	

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PSI - Long Beach	Project: KEN-1	
3960 Gilman Street	Project Number: 559-6G017	**Reported:**
Long Beach CA, 90815	Project Manager: Eric Fraske	10/03/06 16:02

B19-1
T601317-37 (Soil)

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Not
SunStar Laboratories, Inc.									
Metals by EPA 6010B									
Antimony	ND	3.0	mg/kg	1	6092604	09/26/06	09/28/06	EPA 6010B	
Silver	ND	2.0	"	"	"	"	"	"	
Arsenic	ND	0.22	"	"	"	"	"	"	
Barium	**240**	1.0	"	"	"	"	"	"	
Beryllium	ND	1.0	"	"	"	"	"	"	
Cadmium	ND	1.6	"	"	"	"	"	"	
Chromium	**27**	2.0	"	"	"	"	"	"	
Cobalt	**15**	2.0	"	"	"	"	"	"	
Copper	**46**	1.0	"	"	"	"	"	"	
Lead	**70**	3.0	"	"	"	"	"	"	
Molybdenum	ND	1.0	"	"	"	"	"	"	
Nickel	**19**	2.0	"	"	"	"	"	"	
Selenium	ND	5.0	"	"	"	"	"	"	
Thallium	ND	2.0	"	"	"	"	"	"	
Vanadium	**52**	5.0	"	"	"	"	"	"	
Zinc	**150**	1.0	"	"	"	"	"	"	
Cold Vapor Extraction EPA 7470/7471									
Mercury	**0.24**	0.10	mg/kg	1	6092609	09/26/06	10/03/06	EPA 7471A Soil	
Conventional Chemistry Parameters by APHA/EPA Methods									
pH	**7.2**		pH Units	1	6092704	09/27/06	09/29/06	EPA 9045B	

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John J. Hyl

PSI - Long Beach	Project: KEN-1	
3960 Gilman Street	Project Number: 559-6G017	**Reported:**
Long Beach CA, 90815	Project Manager: Eric Fraske	10/03/06 16:02

B20-1
T601317-38 (Soil)

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Not
SunStar Laboratories, Inc.									
Metals by EPA 6010B									
Antimony	ND	3.0	mg/kg	1	6092604	09/26/06	09/28/06	EPA 6010B	
Silver	ND	2.0	"	"	"	"	"	"	
Arsenic	ND	0.22	"	"	"	"	"	"	
Barium	**58**	1.0	"	"	"	"	"	"	
Beryllium	ND	1.0	"	"	"	"	09/28/06	"	
Cadmium	ND	1.6	"	"	"	"	09/28/06	"	
Chromium	**8.1**	2.0	"	"	"	"	"	"	
Cobalt	**6.3**	2.0	"	"	"	"	"	"	
Copper	**6.0**	1.0	"	"	"	"	"	"	
Lead	ND	3.0	"	"	"	"	"	"	
Molybdenum	ND	1.0	"	"	"	"	"	"	
Nickel	**5.8**	2.0	"	"	"	"	"	"	
Selenium	ND	5.0	"	"	"	"	"	"	
Thallium	ND	2.0	"	"	"	"	"	"	
Vanadium	**24**	5.0	"	"	"	"	"	"	
Zinc	**25**	1.0	"	"	"	"	"	"	
Cold Vapor Extraction EPA 7470/7471									
Mercury	ND	0.10	mg/kg	1	6092609	09/26/06	10/03/06	EPA 7471A Soil	
Conventional Chemistry Parameters by APHA/EPA Methods									
pH	**7.5**		pH Units	1	6092704	09/27/06	09/29/06	EPA 9045B	

PSI - Long Beach	Project: KEN-1	
3960 Gilman Street	Project Number: 559-6G017	**Reported:**
Long Beach CA, 90815	Project Manager: Eric Fraske	10/03/06 16:02

B20-5
T601317-39 (Soil)

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Not
SunStar Laboratories, Inc.									
Metals by EPA 6010B									
Antimony	ND	3.0	mg/kg	1	6092604	09/26/06	09/28/06	EPA 6010B	
Silver	ND	2.0	"	"	"	"	"	"	
Arsenic	ND	0.22	"	"	"	"	"	"	
Barium	**31**	1.0	"	"	"	"	"	"	
Beryllium	ND	1.0	"	"	"	"	"	"	
Cadmium	ND	1.6	"	"	"	"	"	"	
Chromium	**4.1**	2.0	"	"	"	"	"	"	
Cobalt	**2.6**	2.0	"	"	"	"	"	"	
Copper	**8.2**	1.0	"	"	"	"	"	"	
Lead	ND	3.0	"	"	"	"	"	"	
Molybdenum	ND	1.0	"	"	"	"	"	"	
Nickel	**2.4**	2.0	"	"	"	"	"	"	
Selenium	ND	5.0	"	"	"	"	"	"	
Thallium	ND	2.0	"	"	"	"	"	"	
Vanadium	**17**	5.0	"	"	"	"	"	"	
Zinc	**16**	1.0	"	"	"	"	"	"	
Cold Vapor Extraction EPA 7470/7471									
Mercury	ND	0.10	mg/kg	1	6092609	09/26/06	10/03/06	EPA 7471A Soil	
Conventional Chemistry Parameters by APHA/EPA Methods									
pH	**7.7**		pH Units	1	6092704	09/27/06	09/29/06	EPA 9045B	

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PSI - Long Beach	Project: KEN-1	
3960 Gilman Street	Project Number: 559-6G017	**Reported:**
Long Beach CA, 90815	Project Manager: Eric Fraske	10/03/06 16:02

B20-10
T601317-40 (Soil)

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Not
SunStar Laboratories, Inc.									
Metals by EPA 6010B									
Antimony	ND	3.0	mg/kg	1	6092605	09/26/06	09/28/06	EPA 6010B	
Silver	ND	2.0	"	"	"	"	09/28/06	"	
Arsenic	ND	0.22	"	"	"	"	09/28/06	"	
Barium	**22**	1.0	"	"	"	"	"	"	
Beryllium	ND	1.0	"	"	"	"	09/28/06	"	
Cadmium	ND	1.6	"	"	"	"	09/28/06	"	
Chromium	**2.1**	2.0	"	"	"	"	"	"	
Cobalt	ND	2.0	"	"	"	"	"	"	
Copper	**3.6**	1.0	"	"	"	"	09/28/06	"	
Lead	ND	3.0	"	"	"	"	09/28/06	"	
Molybdenum	ND	1.0	"	"	"	"	"	"	
Nickel	ND	2.0	"	"	"	"	"	"	
Selenium	ND	5.0	"	"	"	"	"	"	
Thallium	ND	2.0	"	"	"	"	"	"	
Vanadium	**5.4**	5.0	"	"	"	"	09/28/06	"	
Zinc	**7.6**	1.0	"	"	"	"	09/28/06	"	
Cold Vapor Extraction EPA 7470/7471									
Mercury	ND	0.10	mg/kg	1	6092610	09/26/06	10/03/06	EPA 7471A Soil	
Conventional Chemistry Parameters by APHA/EPA Methods									
pH	**8.2**		pH Units	1	6092704	09/27/06	09/29/06	EPA 9045B	

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PSI - Long Beach	Project: KEN-1	
3960 Gilman Street	Project Number: 559-6G017	**Reported:**
Long Beach CA, 90815	Project Manager: Eric Fraske	10/03/06 16:02

B20-15
T601317-41 (Soil)

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Not
SunStar Laboratories, Inc.									
Metals by EPA 6010B									
Antimony	ND	3.0	mg/kg	1	6092605	09/26/06	09/28/06	EPA 6010B	
Silver	ND	2.0	"	"	"	"	"	"	
Arsenic	ND	0.22	"	"	"	"	"	"	
Barium	**43**	1.0	"	"	"	"	"	"	
Beryllium	ND	1.0	"	"	"	"	"	"	
Cadmium	ND	1.6	"	"	"	"	"	"	
Chromium	**3.9**	2.0	"	"	"	"	"	"	
Cobalt	**3.0**	2.0	"	"	"	"	"	"	
Copper	**3.7**	1.0	"	"	"	"	"	"	
Lead	ND	3.0	"	"	"	"	"	"	
Molybdenum	ND	1.0	"	"	"	"	"	"	
Nickel	**2.7**	2.0	"	"	"	"	"	"	
Selenium	ND	5.0	"	"	"	"	"	"	
Thallium	ND	2.0	"	"	"	"	"	"	
Vanadium	**11**	5.0	"	"	"	"	"	"	
Zinc	**13**	1.0	"	"	"	"	"	"	
Cold Vapor Extraction EPA 7470/7471									
Mercury	ND	0.10	mg/kg	1	6092610	09/26/06	10/03/06	EPA 7471A Soil	
Conventional Chemistry Parameters by APHA/EPA Methods									
pH	**7.4**		pH Units	1	6092705	09/27/06	09/29/06	EPA 9045B	

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John J. Light

PSI - Long Beach	Project: KEN-1	
3960 Gilman Street	Project Number: 559-6G017	**Reported:**
Long Beach CA, 90815	Project Manager: Eric Fraske	10/03/06 16:02

B6-1
T601317-42 (Soil)

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Not
SunStar Laboratories, Inc.									
Metals by EPA 6010B									
Antimony	ND	3.0	mg/kg	1	6092605	09/26/06	09/28/06	EPA 6010B	
Silver	ND	2.0	"	"	"	"	"	"	
Arsenic	**1.0**	0.22	"	"	"	"	"	"	
Barium	**180**	1.0	"	"	"	"	"	"	
Beryllium	ND	1.0	"	"	"	"	"	"	
Cadmium	ND	1.6	"	"	"	"	"	"	
Chromium	**23**	2.0	"	"	"	"	"	"	
Cobalt	**11**	2.0	"	"	"	"	"	"	
Copper	**40**	1.0	"	"	"	"	"	"	
Lead	**62**	3.0	"	"	"	"	"	"	
Molybdenum	ND	1.0	"	"	"	"	"	"	
Nickel	**16**	2.0	"	"	"	"	"	"	
Selenium	ND	5.0	"	"	"	"	"	"	
Thallium	ND	2.0	"	"	"	"	"	"	
Vanadium	**40**	5.0	"	"	"	"	"	"	
Zinc	**130**	1.0	"	"	"	"	"	"	
Cold Vapor Extraction EPA 7470/7471									
Mercury	**0.10**	0.10	mg/kg	1	6092610	09/26/06	10/03/06	EPA 7471A Soil	
Conventional Chemistry Parameters by APHA/EPA Methods									
pH	**6.5**		pH Units	1	6092705	09/27/06	09/29/06	EPA 9045B	

SunStar Laboratories, Inc.

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PSI - Long Beach	Project: KEN-1	
3960 Gilman Street	Project Number: 559-6G017	**Reported:**
Long Beach CA, 90815	Project Manager: Eric Fraske	10/03/06 16:02

B6-5
T601317-43 (Soil)

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Not
SunStar Laboratories, Inc.									
Metals by EPA 6010B									
Antimony	ND	3.0	mg/kg	1	6092605	09/26/06	09/28/06	EPA 6010B	
Silver	ND	2.0	"	"	"	"	"	"	
Arsenic	ND	0.22	"	"	"	"	"	"	
Barium	**140**	1.0	"	"	"	"	"	"	
Beryllium	ND	1.0	"	"	"	"	"	"	
Cadmium	ND	1.6	"	"	"	"	"	"	
Chromium	**17**	2.0	"	"	"	"	"	"	
Cobalt	**13**	2.0	"	"	"	"	"	"	
Copper	**15**	1.0	"	"	"	"	"	"	
Lead	ND	3.0	"	"	"	"	"	"	
Molybdenum	ND	1.0	"	"	"	"	"	"	
Nickel	**12**	2.0	"	"	"	"	"	"	
Selenium	ND	5.0	"	"	"	"	"	"	
Thallium	ND	2.0	"	"	"	"	"	"	
Vanadium	**41**	5.0	"	"	"	"	"	"	
Zinc	**44**	1.0	"	"	"	"	"	"	
Cold Vapor Extraction EPA 7470/7471									
Mercury	ND	0.10	mg/kg	1	6092610	09/26/06	10/03/06	EPA 7471A Soil	
Conventional Chemistry Parameters by APHA/EPA Methods									
pH	**7.1**		pH Units	1	6092705	09/27/06	09/29/06	EPA 9045B	

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PSI - Long Beach	Project: KEN-1	
3960 Gilman Street	Project Number: 559-6G017	**Reported:**
Long Beach CA, 90815	Project Manager: Eric Fraske	10/03/06 16:02

B6-10
T601317-44 (Soil)

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Not
SunStar Laboratories, Inc.									
Metals by EPA 6010B									
Antimony	ND	3.0	mg/kg	1	6092605	09/26/06	09/28/06	EPA 6010B	
Silver	ND	2.0	"	"	"	"	"	"	
Arsenic	ND	0.22	"	"	"	"	"	"	
Barium	**140**	1.0	"	"	"	"	"	"	
Beryllium	ND	1.0	"	"	"	"	"	"	
Cadmium	ND	1.6	"	"	"	"	"	"	
Chromium	**18**	2.0	"	"	"	"	"	"	
Cobalt	**9.0**	2.0	"	"	"	"	"	"	
Copper	**26**	1.0	"	"	"	"	"	"	
Lead	**54**	3.0	"	"	"	"	"	"	
Molybdenum	ND	1.0	"	"	"	"	"	"	
Nickel	**12**	2.0	"	"	"	"	"	"	
Selenium	ND	5.0	"	"	"	"	"	"	
Thallium	ND	2.0	"	"	"	"	"	"	
Vanadium	**32**	5.0	"	"	"	"	"	"	
Zinc	**92**	1.0	"	"	"	"	"	"	
Cold Vapor Extraction EPA 7470/7471									
Mercury	**0.14**	0.10	mg/kg	1	6092610	09/26/06	10/03/06	EPA 7471A Soil	
Conventional Chemistry Parameters by APHA/EPA Methods									
pH	**6.8**		pH Units	1	6092705	09/27/06	09/29/06	EPA 9045B	

SunStar Laboratories, Inc.

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PSI - Long Beach	Project: KEN-1	
3960 Gilman Street	Project Number: 559-6G017	**Reported:**
Long Beach CA, 90815	Project Manager: Eric Fraske	10/03/06 16:02

B6-15
T601317-45 (Soil)

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Not
SunStar Laboratories, Inc.									
Metals by EPA 6010B									
Antimony	ND	3.0	mg/kg	1	6092605	09/26/06	09/28/06	EPA 6010B	
Silver	ND	2.0	"	"	"	"	"	"	
Arsenic	ND	0.22	"	"	"	"	"	"	
Barium	**96**	1.0	"	"	"	"	"	"	
Beryllium	ND	1.0	"	"	"	"	09/28/06	"	
Cadmium	ND	1.6	"	"	"	"	09/28/06	"	
Chromium	**8.2**	2.0	"	"	"	"	"	"	
Cobalt	**7.1**	2.0	"	"	"	"	"	"	
Copper	**6.8**	1.0	"	"	"	"	"	"	
Lead	ND	3.0	"	"	"	"	"	"	
Molybdenum	ND	1.0	"	"	"	"	"	"	
Nickel	**6.2**	2.0	"	"	"	"	"	"	
Selenium	ND	5.0	"	"	"	"	"	"	
Thallium	ND	2.0	"	"	"	"	"	"	
Vanadium	**27**	5.0	"	"	"	"	"	"	
Zinc	**25**	1.0	"	"	"	"	"	"	
Cold Vapor Extraction EPA 7470/7471									
Mercury	ND	0.10	mg/kg	1	6092610	09/26/06	10/03/06	EPA 7471A Soil	
Conventional Chemistry Parameters by APHA/EPA Methods									
pH	**7.3**		pH Units	1	6092705	09/27/06	09/29/06	EPA 9045B	

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PSI - Long Beach	Project: KEN-1	
3960 Gilman Street	Project Number: 559-6G017	**Reported:**
Long Beach CA, 90815	Project Manager: Eric Fraske	10/03/06 16:02

B9-1
T601317-46 (Soil)

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Not
SunStar Laboratories, Inc.									
Metals by EPA 6010B									
Antimony	ND	3.0	mg/kg	1	6092605	09/26/06	09/28/06	EPA 6010B	
Silver	ND	2.0	"	"	"	"	"	"	
Arsenic	ND	0.22	"	"	"	"	"	"	
Barium	**200**	1.0	"	"	"	"	"	"	
Beryllium	ND	1.0	"	"	"	"	"	"	
Cadmium	ND	1.6	"	"	"	"	"	"	
Chromium	**22**	2.0	"	"	"	"	"	"	
Cobalt	**14**	2.0	"	"	"	"	"	"	
Copper	**21**	1.0	"	"	"	"	"	"	
Lead	**5.0**	3.0	"	"	"	"	"	"	
Molybdenum	ND	1.0	"	"	"	"	"	"	
Nickel	**16**	2.0	"	"	"	"	"	"	
Selenium	ND	5.0	"	"	"	"	"	"	
Thallium	ND	2.0	"	"	"	"	"	"	
Vanadium	**51**	5.0	"	"	"	"	"	"	
Zinc	**55**	1.0	"	"	"	"	"	"	
Cold Vapor Extraction EPA 7470/7471									
Mercury	ND	0.10	mg/kg	1	6092610	09/26/06	10/03/06	EPA 7471A Soil	
Conventional Chemistry Parameters by APHA/EPA Methods									
pH	**7.1**		pH Units	1	6092705	09/27/06	09/29/06	EPA 9045B	

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PSI - Long Beach	Project: KEN-1	
3960 Gilman Street	Project Number: 559-6G017	**Reported:**
Long Beach CA, 90815	Project Manager: Eric Fraske	10/03/06 16:02

B9-5
T601317-47 (Soil)

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Not
SunStar Laboratories, Inc.									
Metals by EPA 6010B									
Antimony	ND	3.0	mg/kg	1	6092605	09/26/06	09/28/06	EPA 6010B	
Silver	ND	2.0	"	"	"	"	"	"	
Arsenic	ND	0.22	"	"	"	"	"	"	
Barium	**220**	1.0	"	"	"	"	"	"	
Beryllium	ND	1.0	"	"	"	"	"	"	
Cadmium	ND	1.6	"	"	"	"	"	"	
Chromium	**25**	2.0	"	"	"	"	"	"	
Cobalt	**16**	2.0	"	"	"	"	"	"	
Copper	**27**	1.0	"	"	"	"	"	"	
Lead	**9.3**	3.0	"	"	"	"	"	"	
Molybdenum	ND	1.0	"	"	"	"	"	"	
Nickel	**17**	2.0	"	"	"	"	"	"	
Selenium	ND	5.0	"	"	"	"	"	"	
Thallium	ND	2.0	"	"	"	"	"	"	
Vanadium	**52**	5.0	"	"	"	"	"	"	
Zinc	**72**	1.0	"	"	"	"	"	"	
Cold Vapor Extraction EPA 7470/7471									
Mercury	ND	0.10	mg/kg	1	6092610	09/26/06	10/03/06	EPA 7471A Soil	
Conventional Chemistry Parameters by APHA/EPA Methods									
pH	**7.3**		pH Units	1	6092705	09/27/06	09/29/06	EPA 9045B	

The results in this report apply to the samples analyzed in accordance with the chain o custody document. This analytical report must be reproduced in its entirety.

PSI - Long Beach	Project: KEN-1	
3960 Gilman Street	Project Number: 559-6G017	**Reported:**
Long Beach CA, 90815	Project Manager: Eric Fraske	10/03/06 16:02

B9-10
T601317-48 (Soil)

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Not
SunStar Laboratories, Inc.									
Metals by EPA 6010B									
Antimony	ND	3.0	mg/kg	1	6092605	09/26/06	09/28/06	EPA 6010B	
Silver	ND	2.0	"	"	"	"	"	"	
Arsenic	ND	0.22	"	"	"	"	"	"	
Barium	**150**	1.0	"	"	"	"	"	"	
Beryllium	ND	1.0	"	"	"	"	"	"	
Cadmium	ND	1.6	"	"	"	"	"	"	
Chromium	**15**	2.0	"	"	"	"	"	"	
Cobalt	**10**	2.0	"	"	"	"	"	"	
Copper	**31**	1.0	"	"	"	"	"	"	
Lead	**6.0**	3.0	"	"	"	"	"	"	
Molybdenum	ND	1.0	"	"	"	"	"	"	
Nickel	**12**	2.0	"	"	"	"	"	"	
Selenium	**5.4**	5.0	"	"	"	"	"	"	
Thallium	ND	2.0	"	"	"	"	"	"	
Vanadium	**34**	5.0	"	"	"	"	"	"	
Zinc	**54**	1.0	"	"	"	"	"	"	
Cold Vapor Extraction EPA 7470/7471									
Mercury	ND	0.10	mg/kg	1	6092610	09/26/06	10/03/06	EPA 7471A Soil	
Conventional Chemistry Parameters by APHA/EPA Methods									
pH	**7.2**		pH Units	1	6092705	09/27/06	09/29/06	EPA 9045B	

The results in this report apply to the samples analyzed in accordance with the chain o custody document. This analytical report must be reproduced in its entirety.

PSI - Long Beach	Project: KEN-1	
3960 Gilman Street	Project Number: 559-6G017	**Reported:**
Long Beach CA, 90815	Project Manager: Eric Fraske	10/03/06 16:02

B9-15
T601317-49 (Soil)

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Not
SunStar Laboratories, Inc.									
Metals by EPA 6010B									
Antimony	ND	3.0	mg/kg	1	6092605	09/26/06	09/28/06	EPA 6010B	
Silver	ND	2.0	"	"	"	"	"	"	
Arsenic	ND	0.22	"	"	"	"	"	"	
Barium	**50**	1.0	"	"	"	"	"	"	
Beryllium	ND	1.0	"	"	"	"	09/28/06	"	
Cadmium	ND	1.6	"	"	"	"	09/28/06	"	
Chromium	**6.4**	2.0	"	"	"	"	"	"	
Cobalt	**4.1**	2.0	"	"	"	"	"	"	
Copper	**4.7**	1.0	"	"	"	"	"	"	
Lead	ND	3.0	"	"	"	"	"	"	
Molybdenum	ND	1.0	"	"	"	"	"	"	
Nickel	**4.3**	2.0	"	"	"	"	"	"	
Selenium	ND	5.0	"	"	"	"	"	"	
Thallium	ND	2.0	"	"	"	"	"	"	
Vanadium	**14**	5.0	"	"	"	"	"	"	
Zinc	**15**	1.0	"	"	"	"	"	"	
Cold Vapor Extraction EPA 7470/7471									
Mercury	**0.14**	0.10	mg/kg	1	6092610	09/26/06	10/03/06	EPA 7471A Soil	
Conventional Chemistry Parameters by APHA/EPA Methods									
pH	**6.8**		pH Units	1	6092705	09/27/06	09/29/06	EPA 9045B	

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PSI - Long Beach	Project: KEN-1	
3960 Gilman Street	Project Number: 559-6G017	**Reported:**
Long Beach CA, 90815	Project Manager: Eric Fraske	10/03/06 16:02

B10-1
T601317-50 (Soil)

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Not
SunStar Laboratories, Inc.									
Metals by EPA 6010B									
Antimony	ND	3.0	mg/kg	1	6092605	09/26/06	09/28/06	EPA 6010B	
Silver	ND	2.0	"	"	"	"	"	"	
Arsenic	**1.8**	0.22	"	"	"	"	"	"	
Barium	**210**	1.0	"	"	"	"	"	"	
Beryllium	ND	1.0	"	"	"	"	"	"	
Cadmium	**2.3**	1.6	"	"	"	"	"	"	
Chromium	**26**	2.0	"	"	"	"	"	"	
Cobalt	**9.6**	2.0	"	"	"	"	"	"	
Copper	**49**	1.0	"	"	"	"	"	"	
Lead	**77**	3.0	"	"	"	"	"	"	
Molybdenum	**3.1**	1.0	"	"	"	"	"	"	
Nickel	**21**	2.0	"	"	"	"	"	"	
Selenium	ND	5.0	"	"	"	"	"	"	
Thallium	ND	2.0	"	"	"	"	"	"	
Vanadium	**35**	5.0	"	"	"	"	"	"	
Zinc	**140**	1.0	"	"	"	"	"	"	
Cold Vapor Extraction EPA 7470/7471									
Mercury	ND	0.10	mg/kg	1	6092610	09/26/06	10/03/06	EPA 7471A Soil	
Conventional Chemistry Parameters by APHA/EPA Methods									
pH	**6.5**		pH Units	1	6092705	09/27/06	09/29/06	EPA 9045B	

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PSI - Long Beach	Project: KEN-1	
3960 Gilman Street	Project Number: 559-6G017	**Reported:**
Long Beach CA, 90815	Project Manager: Eric Fraske	10/03/06 16:02

B10-5
T601317-51 (Soil)

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Not
SunStar Laboratories, Inc.									
Metals by EPA 6010B									
Antimony	ND	3.0	mg/kg	1	6092605	09/26/06	09/28/06	EPA 6010B	
Silver	ND	2.0	"	"	"	"	"	"	
Arsenic	ND	0.22	"	"	"	"	"	"	
Barium	**56**	1.0	"	"	"	"	"	"	
Beryllium	ND	1.0	"	"	"	"	"	"	
Cadmium	ND	1.6	"	"	"	"	"	"	
Chromium	**5.7**	2.0	"	"	"	"	"	"	
Cobalt	**4.7**	2.0	"	"	"	"	"	"	
Copper	**6.5**	1.0	"	"	"	"	"	"	
Lead	ND	3.0	"	"	"	"	"	"	
Molybdenum	ND	1.0	"	"	"	"	"	"	
Nickel	**3.8**	2.0	"	"	"	"	"	"	
Selenium	ND	5.0	"	"	"	"	"	"	
Thallium	ND	2.0	"	"	"	"	"	"	
Vanadium	**18**	5.0	"	"	"	"	"	"	
Zinc	**18**	1.0	"	"	"	"	"	"	
Cold Vapor Extraction EPA 7470/7471									
Mercury	ND	0.10	mg/kg	1	6092610	09/26/06	10/03/06	EPA 7471A Soil	
Conventional Chemistry Parameters by APHA/EPA Methods									
pH	**7.1**		pH Units	1	6092705	09/27/06	09/29/06	EPA 9045B	

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PSI - Long Beach	Project: KEN-1	
3960 Gilman Street	Project Number: 559-6G017	**Reported:**
Long Beach CA, 90815	Project Manager: Eric Fraske	10/03/06 16:02

B10-10
T601317-52 (Soil)

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Not
SunStar Laboratories, Inc.									
Metals by EPA 6010B									
Antimony	ND	3.0	mg/kg	1	6092605	09/26/06	09/28/06	EPA 6010B	
Silver	ND	2.0	"	"	"	"	"	"	
Arsenic	ND	0.22	"	"	"	"	"	"	
Barium	**130**	1.0	"	"	"	"	"	"	
Beryllium	ND	1.0	"	"	"	"	"	"	
Cadmium	ND	1.6	"	"	"	"	"	"	
Chromium	**13**	2.0	"	"	"	"	"	"	
Cobalt	**9.1**	2.0	"	"	"	"	"	"	
Copper	**25**	1.0	"	"	"	"	"	"	
Lead	ND	3.0	"	"	"	"	"	"	
Molybdenum	ND	1.0	"	"	"	"	"	"	
Nickel	**9.3**	2.0	"	"	"	"	"	"	
Selenium	ND	5.0	"	"	"	"	"	"	
Thallium	ND	2.0	"	"	"	"	"	"	
Vanadium	**34**	5.0	"	"	"	"	"	"	
Zinc	**50**	1.0	"	"	"	"	"	"	
Cold Vapor Extraction EPA 7470/7471									
Mercury	ND	0.10	mg/kg	1	6092610	09/26/06	10/03/06	EPA 7471A Soil	
Conventional Chemistry Parameters by APHA/EPA Methods									
pH	**7.0**		pH Units	1	6092705	09/27/06	09/29/06	EPA 9045B	

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PSI - Long Beach	Project: KEN-1	
3960 Gilman Street	Project Number: 559-6G017	**Reported:**
Long Beach CA, 90815	Project Manager: Eric Fraske	10/03/06 16:02

B10-15
T601317-53 (Soil)

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Not
SunStar Laboratories, Inc.									
Metals by EPA 6010B									
Antimony	ND	3.0	mg/kg	1	6092605	09/26/06	09/28/06	EPA 6010B	
Silver	ND	2.0	"	"	"	"	"	"	
Arsenic	ND	0.22	"	"	"	"	"	"	
Barium	**31**	1.0	"	"	"	"	"	"	
Beryllium	ND	1.0	"	"	"	"	"	"	
Cadmium	ND	1.6	"	"	"	"	"	"	
Chromium	**2.0**	2.0	"	"	"	"	"	"	
Cobalt	**2.0**	2.0	"	"	"	"	"	"	
Copper	**8.1**	1.0	"	"	"	"	"	"	
Lead	ND	3.0	"	"	"	"	"	"	
Molybdenum	ND	1.0	"	"	"	"	"	"	
Nickel	ND	2.0	"	"	"	"	"	"	
Selenium	ND	5.0	"	"	"	"	"	"	
Thallium	ND	2.0	"	"	"	"	"	"	
Vanadium	**6.6**	5.0	"	"	"	"	"	"	
Zinc	**11**	1.0	"	"	"	"	"	"	
Cold Vapor Extraction EPA 7470/7471									
Mercury	**0.16**	0.10	mg/kg	1	6092610	09/26/06	10/03/06	EPA 7471A Soil	
Conventional Chemistry Parameters by APHA/EPA Methods									
pH	**7.2**		pH Units	1	6092705	09/27/06	09/29/06	EPA 9045B	

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PSI - Long Beach	Project: KEN-1	
3960 Gilman Street	Project Number: 559-6G017	**Reported:**
Long Beach CA, 90815	Project Manager: Eric Fraske	10/03/06 16:02

B15-1
T601317-54 (Soil)

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Not
SunStar Laboratories, Inc.									
Metals by EPA 6010B									
Antimony	ND	3.0	mg/kg	1	6092605	09/26/06	09/28/06	EPA 6010B	
Silver	ND	2.0	"	"	"	"	"	"	
Arsenic	ND	0.22	"	"	"	"	"	"	
Barium	**110**	1.0	"	"	"	"	"	"	
Beryllium	ND	1.0	"	"	"	"	09/28/06	"	
Cadmium	ND	1.6	"	"	"	"	09/28/06	"	
Chromium	**12**	2.0	"	"	"	"	"	"	
Cobalt	**8.5**	2.0	"	"	"	"	"	"	
Copper	**14**	1.0	"	"	"	"	"	"	
Lead	ND	3.0	"	"	"	"	"	"	
Molybdenum	ND	1.0	"	"	"	"	"	"	
Nickel	**8.1**	2.0	"	"	"	"	"	"	
Selenium	ND	5.0	"	"	"	"	"	"	
Thallium	ND	2.0	"	"	"	"	"	"	
Vanadium	**29**	5.0	"	"	"	"	"	"	
Zinc	**36**	1.0	"	"	"	"	"	"	
Cold Vapor Extraction EPA 7470/7471									
Mercury	**0.13**	0.10	mg/kg	1	6092610	09/26/06	10/03/06	EPA 7471A Soil	
Conventional Chemistry Parameters by APHA/EPA Methods									
pH	**6.8**		pH Units	1	6092705	09/27/06	09/29/06	EPA 9045B	

SunStar Laboratories, Inc.

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PSI - Long Beach	Project: KEN-1	
3960 Gilman Street	Project Number: 559-6G017	**Reported:**
Long Beach CA, 90815	Project Manager: Eric Fraske	10/03/06 16:02

B15-5
T601317-55 (Soil)

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Not
SunStar Laboratories, Inc.									
Metals by EPA 6010B									
Antimony	ND	3.0	mg/kg	1	6092605	09/26/06	09/28/06	EPA 6010B	
Silver	ND	2.0	"	"	"	"	"	"	
Arsenic	ND	0.22	"	"	"	"	"	"	
Barium	**74**	1.0	"	"	"	"	"	"	
Beryllium	ND	1.0	"	"	"	"	09/28/06	"	
Cadmium	ND	1.6	"	"	"	"	09/28/06	"	
Chromium	**9.9**	2.0	"	"	"	"	"	"	
Cobalt	**7.5**	2.0	"	"	"	"	"	"	
Copper	**8.8**	1.0	"	"	"	"	"	"	
Lead	ND	3.0	"	"	"	"	"	"	
Molybdenum	ND	1.0	"	"	"	"	"	"	
Nickel	**6.2**	2.0	"	"	"	"	"	"	
Selenium	ND	5.0	"	"	"	"	"	"	
Thallium	ND	2.0	"	"	"	"	"	"	
Vanadium	**29**	5.0	"	"	"	"	"	"	
Zinc	**29**	1.0	"	"	"	"	"	"	
Cold Vapor Extraction EPA 7470/7471									
Mercury	ND	0.10	mg/kg	1	6092610	09/26/06	10/03/06	EPA 7471A Soil	
Conventional Chemistry Parameters by APHA/EPA Methods									
pH	**7.3**		pH Units	1	6092705	09/27/06	09/29/06	EPA 9045B	

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PSI - Long Beach	Project: KEN-1	
3960 Gilman Street	Project Number: 559-6G017	**Reported:**
Long Beach CA, 90815	Project Manager: Eric Fraske	10/03/06 16:02

B15-10
T601317-56 (Soil)

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Not
SunStar Laboratories, Inc.									
Metals by EPA 6010B									
Antimony	ND	3.0	mg/kg	1	6092605	09/26/06	09/28/06	EPA 6010B	
Silver	ND	2.0	"	"	"	"	"	"	
Arsenic	ND	0.22	"	"	"	"	"	"	
Barium	**99**	1.0	"	"	"	"	"	"	
Beryllium	ND	1.0	"	"	"	"	"	"	
Cadmium	ND	1.6	"	"	"	"	"	"	
Chromium	**9.6**	2.0	"	"	"	"	"	"	
Cobalt	**6.6**	2.0	"	"	"	"	"	"	
Copper	**8.4**	1.0	"	"	"	"	"	"	
Lead	ND	3.0	"	"	"	"	"	"	
Molybdenum	ND	1.0	"	"	"	"	"	"	
Nickel	**6.4**	2.0	"	"	"	"	"	"	
Selenium	ND	5.0	"	"	"	"	"	"	
Thallium	ND	2.0	"	"	"	"	"	"	
Vanadium	**22**	5.0	"	"	"	"	"	"	
Zinc	**27**	1.0	"	"	"	"	"	"	
Cold Vapor Extraction EPA 7470/7471									
Mercury	ND	0.10	mg/kg	1	6092610	09/26/06	10/03/06	EPA 7471A Soil	
Conventional Chemistry Parameters by APHA/EPA Methods									
pH	**7.1**		pH Units	1	6092705	09/27/06	09/29/06	EPA 9045B	

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PSI - Long Beach	Project: KEN-1	
3960 Gilman Street	Project Number: 559-6G017	**Reported:**
Long Beach CA, 90815	Project Manager: Eric Fraske	10/03/06 16:02

B15-15
T601317-57 (Soil)

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Not
SunStar Laboratories, Inc.									
Metals by EPA 6010B									
Antimony	ND	3.0	mg/kg	1	6092605	09/26/06	09/28/06	EPA 6010B	
Silver	ND	2.0	"	"	"	"	"	"	
Arsenic	ND	0.22	"	"	"	"	"	"	
Barium	**56**	1.0	"	"	"	"	"	"	
Beryllium	ND	1.0	"	"	"	"	"	"	
Cadmium	ND	1.6	"	"	"	"	"	"	
Chromium	**5.3**	2.0	"	"	"	"	"	"	
Cobalt	**4.4**	2.0	"	"	"	"	"	"	
Copper	**7.6**	1.0	"	"	"	"	"	"	
Lead	ND	3.0	"	"	"	"	"	"	
Molybdenum	ND	1.0	"	"	"	"	"	"	
Nickel	**2.5**	2.0	"	"	"	"	"	"	
Selenium	ND	5.0	"	"	"	"	"	"	
Thallium	ND	2.0	"	"	"	"	"	"	
Vanadium	**19**	5.0	"	"	"	"	"	"	
Zinc	**16**	1.0	"	"	"	"	"	"	
Cold Vapor Extraction EPA 7470/7471									
Mercury	ND	0.10	mg/kg	1	6092610	09/26/06	10/03/06	EPA 7471A Soil	
Conventional Chemistry Parameters by APHA/EPA Methods									
pH	**7.4**		pH Units	1	6092705	09/27/06	09/29/06	EPA 9045B	

PSI - Long Beach	Project: KEN-1	
3960 Gilman Street	Project Number: 559-6G017	**Reported:**
Long Beach CA, 90815	Project Manager: Eric Fraske	10/03/06 16:02

B1-1
T601317-58 (Soil)

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Not
SunStar Laboratories, Inc.									
Metals by EPA 6010B									
Antimony	ND	3.0	mg/kg	1	6092605	09/26/06	09/28/06	EPA 6010B	
Silver	ND	2.0	"	"	"	"	"	"	
Arsenic	ND	0.22	"	"	"	"	"	"	
Barium	**160**	1.0	"	"	"	"	"	"	
Beryllium	ND	1.0	"	"	"	"	"	"	
Cadmium	**2.3**	1.6	"	"	"	"	"	"	
Chromium	**30**	2.0	"	"	"	"	"	"	
Cobalt	**10**	2.0	"	"	"	"	"	"	
Copper	**37**	1.0	"	"	"	"	"	"	
Lead	**42**	3.0	"	"	"	"	"	"	
Molybdenum	ND	1.0	"	"	"	"	"	"	
Nickel	**18**	2.0	"	"	"	"	"	"	
Selenium	ND	5.0	"	"	"	"	"	"	
Thallium	ND	2.0	"	"	"	"	"	"	
Vanadium	**42**	5.0	"	"	"	"	"	"	
Zinc	**170**	1.0	"	"	"	"	"	"	
Cold Vapor Extraction EPA 7470/7471									
Mercury	**0.11**	0.10	mg/kg	1	6092610	09/26/06	10/03/06	EPA 7471A Soil	
Conventional Chemistry Parameters by APHA/EPA Methods									
pH	**6.8**		pH Units	1	6092705	09/27/06	09/29/06	EPA 9045B	

The results in this report apply to the samples analyzed in accordance with the chain o custody document. This analytical report must be reproduced in its entirety.

PSI - Long Beach	Project: KEN-1	
3960 Gilman Street	Project Number: 559-6G017	**Reported:**
Long Beach CA, 90815	Project Manager: Eric Fraske	10/03/06 16:02

B1-10
T601317-59 (Soil)

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Not
SunStar Laboratories, Inc.									
Metals by EPA 6010B									
Antimony	ND	3.0	mg/kg	1	6092605	09/26/06	09/28/06	EPA 6010B	
Silver	ND	2.0	"	"	"	"	"	"	
Arsenic	ND	0.22	"	"	"	"	"	"	
Barium	**84**	1.0	"	"	"	"	"	"	
Beryllium	ND	1.0	"	"	"	"	09/28/06	"	
Cadmium	ND	1.6	"	"	"	"	09/28/06	"	
Chromium	**9.6**	2.0	"	"	"	"	"	"	
Cobalt	**7.2**	2.0	"	"	"	"	"	"	
Copper	**9.7**	1.0	"	"	"	"	"	"	
Lead	ND	3.0	"	"	"	"	"	"	
Molybdenum	ND	1.0	"	"	"	"	"	"	
Nickel	**5.6**	2.0	"	"	"	"	"	"	
Selenium	ND	5.0	"	"	"	"	"	"	
Thallium	ND	2.0	"	"	"	"	"	"	
Vanadium	**29**	5.0	"	"	"	"	"	"	
Zinc	**32**	1.0	"	"	"	"	"	"	
Cold Vapor Extraction EPA 7470/7471									
Mercury	ND	0.10	mg/kg	1	6092610	09/26/06	10/03/06	EPA 7471A Soil	
Conventional Chemistry Parameters by APHA/EPA Methods									
pH	**7.3**		pH Units	1	6092705	09/27/06	09/29/06	EPA 9045B	

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PSI - Long Beach	Project: KEN-1	
3960 Gilman Street	Project Number: 559-6G017	**Reported:**
Long Beach CA, 90815	Project Manager: Eric Fraske	10/03/06 16:02

B1-15
T601317-60 (Soil)

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Not
SunStar Laboratories, Inc.									
Metals by EPA 6010B									
Antimony	ND	3.0	mg/kg	1	6092606	09/26/06	09/28/06	EPA 6010B	
Silver	ND	2.0	"	"	"	"	"	"	
Arsenic	ND	0.22	"	"	"	"	"	"	
Barium	**31**	1.0	"	"	"	"	"	"	
Beryllium	ND	1.0	"	"	"	"	"	"	
Cadmium	ND	1.6	"	"	"	"	"	"	
Chromium	**3.1**	2.0	"	"	"	"	"	"	
Cobalt	**2.4**	2.0	"	"	"	"	"	"	
Copper	ND	1.0	"	"	"	"	"	"	
Lead	ND	3.0	"	"	"	"	"	"	
Molybdenum	ND	1.0	"	"	"	"	"	"	
Nickel	ND	2.0	"	"	"	"	"	"	
Selenium	ND	5.0	"	"	"	"	"	"	
Thallium	ND	2.0	"	"	"	"	"	"	
Vanadium	**13**	5.0	"	"	"	"	"	"	
Zinc	**8.2**	1.0	"	"	"	"	"	"	
Cold Vapor Extraction EPA 7470/7471									
Mercury	**0.26**	0.10	mg/kg	1	6092611	09/26/06	10/03/06	EPA 7471A Soil	
Conventional Chemistry Parameters by APHA/EPA Methods									
pH	**7.4**		pH Units	1	6092705	09/27/06	09/29/06	EPA 9045B	

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PSI - Long Beach	Project: KEN-1	
3960 Gilman Street	Project Number: 559-6G017	**Reported:**
Long Beach CA, 90815	Project Manager: Eric Fraske	10/03/06 16:02

B2-1
T601317-61 (Soil)

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Not
SunStar Laboratories, Inc.									
Metals by EPA 6010B									
Antimony	ND	3.0	mg/kg	1	6092606	09/26/06	09/28/06	EPA 6010B	
Silver	ND	2.0	"	"	"	"	"	"	
Arsenic	ND	0.22	"	"	"	"	"	"	
Barium	**140**	1.0	"	"	"	"	"	"	
Beryllium	ND	1.0	"	"	"	"	"	"	
Cadmium	ND	1.6	"	"	"	"	"	"	
Chromium	**16**	2.0	"	"	"	"	"	"	
Cobalt	**8.0**	2.0	"	"	"	"	"	"	
Copper	**24**	1.0	"	"	"	"	"	"	
Lead	**35**	3.0	"	"	"	"	"	"	
Molybdenum	ND	1.0	"	"	"	"	"	"	
Nickel	**10**	2.0	"	"	"	"	"	"	
Selenium	ND	5.0	"	"	"	"	"	"	
Thallium	ND	2.0	"	"	"	"	"	"	
Vanadium	**28**	5.0	"	"	"	"	"	"	
Zinc	**95**	1.0	"	"	"	"	"	"	
Cold Vapor Extraction EPA 7470/7471									
Mercury	ND	0.10	mg/kg	1	6092611	09/26/06	10/03/06	EPA 7471A Soil	
Conventional Chemistry Parameters by APHA/EPA Methods									
pH	**7.0**		pH Units	1	6092706	09/27/06	09/29/06	EPA 9045B	

PSI - Long Beach	Project: KEN-1	
3960 Gilman Street	Project Number: 559-6G017	**Reported:**
Long Beach CA, 90815	Project Manager: Eric Fraske	10/03/06 16:02

B2-5
T601317-62 (Soil)

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Not
SunStar Laboratories, Inc.									
Metals by EPA 6010B									
Antimony	ND	3.0	mg/kg	1	6092606	09/26/06	09/28/06	EPA 6010B	
Silver	ND	2.0	"	"	"	"	"	"	
Arsenic	ND	0.22	"	"	"	"	"	"	
Barium	**130**	1.0	"	"	"	"	"	"	
Beryllium	ND	1.0	"	"	"	"	"	"	
Cadmium	ND	1.6	"	"	"	"	"	"	
Chromium	**17**	2.0	"	"	"	"	"	"	
Cobalt	**11**	2.0	"	"	"	"	"	"	
Copper	**12**	1.0	"	"	"	"	"	"	
Lead	**3.7**	3.0	"	"	"	"	"	"	
Molybdenum	ND	1.0	"	"	"	"	"	"	
Nickel	**10**	2.0	"	"	"	"	"	"	
Selenium	ND	5.0	"	"	"	"	"	"	
Thallium	ND	2.0	"	"	"	"	"	"	
Vanadium	**39**	5.0	"	"	"	"	"	"	
Zinc	**37**	1.0	"	"	"	"	"	"	
Cold Vapor Extraction EPA 7470/7471									
Mercury	ND	0.10	mg/kg	1	6092611	09/26/06	10/03/06	EPA 7471A Soil	
Conventional Chemistry Parameters by APHA/EPA Methods									
pH	**7.4**		pH Units	1	6092706	09/27/06	09/29/06	EPA 9045B	

SunStar Laboratories, Inc.

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3960 Gilman Street	Project Number: 559-6G017	**Reported:**
Long Beach CA, 90815	Project Manager: Eric Fraske	10/03/06 16:02

B2-10
T601317-63 (Soil)

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Not
SunStar Laboratories, Inc.									
Metals by EPA 6010B									
Antimony	ND	3.0	mg/kg	1	6092606	09/26/06	09/28/06	EPA 6010B	
Silver	ND	2.0	"	"	"	"	"	"	
Arsenic	ND	0.22	"	"	"	"	"	"	
Barium	**100**	1.0	"	"	"	"	"	"	
Beryllium	ND	1.0	"	"	"	"	09/28/06	"	
Cadmium	ND	1.6	"	"	"	"	09/28/06	"	
Chromium	**12**	2.0	"	"	"	"	"	"	
Cobalt	**7.8**	2.0	"	"	"	"	"	"	
Copper	**8.0**	1.0	"	"	"	"	"	"	
Lead	ND	3.0	"	"	"	"	"	"	
Molybdenum	ND	1.0	"	"	"	"	"	"	
Nickel	**7.1**	2.0	"	"	"	"	"	"	
Selenium	ND	5.0	"	"	"	"	"	"	
Thallium	ND	2.0	"	"	"	"	"	"	
Vanadium	**32**	5.0	"	"	"	"	"	"	
Zinc	**33**	1.0	"	"	"	"	"	"	
Cold Vapor Extraction EPA 7470/7471									
Mercury	ND	0.10	mg/kg	1	6092611	09/26/06	10/03/06	EPA 7471A Soil	
Conventional Chemistry Parameters by APHA/EPA Methods									
pH	**7.4**		pH Units	1	6092706	09/27/06	09/29/06	EPA 9045B	

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PSI - Long Beach	Project: KEN-1	
3960 Gilman Street	Project Number: 559-6G017	**Reported:**
Long Beach CA, 90815	Project Manager: Eric Fraske	10/03/06 16:02

B2-15
T601317-64 (Soil)

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Not
SunStar Laboratories, Inc.									
Metals by EPA 6010B									
Antimony	ND	3.0	mg/kg	1	6092606	09/26/06	09/28/06	EPA 6010B	
Silver	ND	2.0	"	"	"	"	"	"	
Arsenic	ND	0.22	"	"	"	"	"	"	
Barium	**120**	1.0	"	"	"	"	"	"	
Beryllium	ND	1.0	"	"	"	"	"	"	
Cadmium	ND	1.6	"	"	"	"	"	"	
Chromium	**14**	2.0	"	"	"	"	"	"	
Cobalt	**12**	2.0	"	"	"	"	"	"	
Copper	**7.6**	1.0	"	"	"	"	"	"	
Lead	ND	3.0	"	"	"	"	"	"	
Molybdenum	ND	1.0	"	"	"	"	"	"	
Nickel	**9.6**	2.0	"	"	"	"	"	"	
Selenium	ND	5.0	"	"	"	"	"	"	
Thallium	ND	2.0	"	"	"	"	"	"	
Vanadium	**41**	5.0	"	"	"	"	"	"	
Zinc	**40**	1.0	"	"	"	"	"	"	
Cold Vapor Extraction EPA 7470/7471									
Mercury	ND	0.10	mg/kg	1	6092611	09/26/06	10/03/06	EPA 7471A Soil	
Conventional Chemistry Parameters by APHA/EPA Methods									
pH	**8.0**		pH Units	1	6092706	09/27/06	09/29/06	EPA 9045B	

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3960 Gilman Street	Project Number: 559-6G017	**Reported:**
Long Beach CA, 90815	Project Manager: Eric Fraske	10/03/06 16:02

B3-1
T601317-65 (Soil)

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Not
SunStar Laboratories, Inc.									
Metals by EPA 6010B									
Antimony	ND	3.0	mg/kg	1	6092606	09/26/06	09/28/06	EPA 6010B	
Silver	ND	2.0	"	"	"	"	"	"	
Arsenic	ND	0.22	"	"	"	"	"	"	
Barium	**150**	1.0	"	"	"	"	"	"	
Beryllium	ND	1.0	"	"	"	"	"	"	
Cadmium	ND	1.6	"	"	"	"	"	"	
Chromium	**18**	2.0	"	"	"	"	"	"	
Cobalt	**11**	2.0	"	"	"	"	"	"	
Copper	**19**	1.0	"	"	"	"	"	"	
Lead	**3.3**	3.0	"	"	"	"	"	"	
Molybdenum	ND	1.0	"	"	"	"	"	"	
Nickel	**12**	2.0	"	"	"	"	"	"	
Selenium	ND	5.0	"	"	"	"	"	"	
Thallium	ND	2.0	"	"	"	"	"	"	
Vanadium	**41**	5.0	"	"	"	"	"	"	
Zinc	**48**	1.0	"	"	"	"	"	"	
Cold Vapor Extraction EPA 7470/7471									
Mercury	ND	0.10	mg/kg	1	6092611	09/26/06	10/03/06	EPA 7471A Soil	
Conventional Chemistry Parameters by APHA/EPA Methods									
pH	**7.6**		pH Units	1	6092706	09/27/06	09/29/06	EPA 9045B	

PSI - Long Beach	Project: KEN-1	
3960 Gilman Street	Project Number: 559-6G017	**Reported:**
Long Beach CA, 90815	Project Manager: Eric Fraske	10/03/06 16:02

B3-5
T601317-66 (Soil)

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Not
SunStar Laboratories, Inc.									
Metals by EPA 6010B									
Antimony	ND	3.0	mg/kg	1	6092606	09/26/06	09/28/06	EPA 6010B	
Silver	ND	2.0	"	"	"	"	"	"	
Arsenic	ND	0.22	"	"	"	"	"	"	
Barium	**190**	1.0	"	"	"	"	"	"	
Beryllium	ND	1.0	"	"	"	"	09/28/06	"	
Cadmium	ND	1.6	"	"	"	"	09/28/06	"	
Chromium	**23**	2.0	"	"	"	"	"	"	
Cobalt	**15**	2.0	"	"	"	"	"	"	
Copper	**22**	1.0	"	"	"	"	"	"	
Lead	**4.4**	3.0	"	"	"	"	"	"	
Molybdenum	ND	1.0	"	"	"	"	"	"	
Nickel	**16**	2.0	"	"	"	"	"	"	
Selenium	ND	5.0	"	"	"	"	"	"	
Thallium	ND	2.0	"	"	"	"	"	"	
Vanadium	**50**	5.0	"	"	"	"	"	"	
Zinc	**52**	1.0	"	"	"	"	"	"	
Cold Vapor Extraction EPA 7470/7471									
Mercury	ND	0.10	mg/kg	1	6092611	09/26/06	10/03/06	EPA 7471A Soil	
Conventional Chemistry Parameters by APHA/EPA Methods									
pH	**7.9**		pH Units	1	6092706	09/27/06	09/29/06	EPA 9045B	

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PSI - Long Beach	Project: KEN-1	
3960 Gilman Street	Project Number: 559-6G017	**Reported:**
Long Beach CA, 90815	Project Manager: Eric Fraske	10/03/06 16:02

B3-10
T601317-67 (Soil)

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Not
SunStar Laboratories, Inc.									
Metals by EPA 6010B									
Antimony	ND	3.0	mg/kg	1	6092606	09/26/06	09/28/06	EPA 6010B	
Silver	ND	2.0	"	"	"	"	"	"	
Arsenic	ND	0.22	"	"	"	"	"	"	
Barium	**40**	1.0	"	"	"	"	"	"	
Beryllium	ND	1.0	"	"	"	"	"	"	
Cadmium	ND	1.6	"	"	"	"	"	"	
Chromium	**3.5**	2.0	"	"	"	"	"	"	
Cobalt	**2.9**	2.0	"	"	"	"	"	"	
Copper	**2.9**	1.0	"	"	"	"	"	"	
Lead	ND	3.0	"	"	"	"	"	"	
Molybdenum	ND	1.0	"	"	"	"	"	"	
Nickel	**2.3**	2.0	"	"	"	"	"	"	
Selenium	ND	5.0	"	"	"	"	"	"	
Thallium	ND	2.0	"	"	"	"	"	"	
Vanadium	**10**	5.0	"	"	"	"	"	"	
Zinc	**12**	1.0	"	"	"	"	"	"	
Cold Vapor Extraction EPA 7470/7471									
Mercury	ND	0.10	mg/kg	1	6092611	09/26/06	10/03/06	EPA 7471A Soil	
Conventional Chemistry Parameters by APHA/EPA Methods									
pH	**8.5**		pH Units	1	6092706	09/27/06	09/29/06	EPA 9045B	

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PSI - Long Beach	Project: KEN-1	
3960 Gilman Street	Project Number: 559-6G017	**Reported:**
Long Beach CA, 90815	Project Manager: Eric Fraske	10/03/06 16:02

B3-15
T601317-68 (Soil)

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Not
SunStar Laboratories, Inc.									
Metals by EPA 6010B									
Antimony	ND	3.0	mg/kg	1	6092606	09/26/06	09/28/06	EPA 6010B	
Silver	ND	2.0	"	"	"	"	"	"	
Arsenic	ND	0.22	"	"	"	"	"	"	
Barium	**51**	1.0	"	"	"	"	"	"	
Beryllium	ND	1.0	"	"	"	"	"	"	
Cadmium	ND	1.6	"	"	"	"	"	"	
Chromium	**7.8**	2.0	"	"	"	"	"	"	
Cobalt	**4.4**	2.0	"	"	"	"	"	"	
Copper	**6.8**	1.0	"	"	"	"	"	"	
Lead	ND	3.0	"	"	"	"	"	"	
Molybdenum	ND	1.0	"	"	"	"	"	"	
Nickel	**3.7**	2.0	"	"	"	"	"	"	
Selenium	ND	5.0	"	"	"	"	"	"	
Thallium	ND	2.0	"	"	"	"	"	"	
Vanadium	**17**	5.0	"	"	"	"	"	"	
Zinc	**17**	1.0	"	"	"	"	"	"	
Cold Vapor Extraction EPA 7470/7471									
Mercury	ND	0.10	mg/kg	1	6092611	09/26/06	10/03/06	EPA 7471A Soil	
Conventional Chemistry Parameters by APHA/EPA Methods									
pH	**8.3**		pH Units	1	6092706	09/27/06	09/29/06	EPA 9045B	

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PSI - Long Beach	Project: KEN-1	
3960 Gilman Street	Project Number: 559-6G017	**Reported:**
Long Beach CA, 90815	Project Manager: Eric Fraske	10/03/06 16:02

B4-1
T601317-69 (Soil)

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Not
SunStar Laboratories, Inc.									
Metals by EPA 6010B									
Antimony	ND	3.0	mg/kg	1	6092606	09/26/06	09/28/06	EPA 6010B	
Silver	ND	2.0	"	"	"	"	"	"	
Arsenic	**1.8**	0.22	"	"	"	"	"	"	
Barium	**80**	1.0	"	"	"	"	"	"	
Beryllium	ND	1.0	"	"	"	"	"	"	
Cadmium	ND	1.6	"	"	"	"	"	"	
Chromium	**5.5**	2.0	"	"	"	"	"	"	
Cobalt	**4.3**	2.0	"	"	"	"	"	"	
Copper	**12**	1.0	"	"	"	"	"	"	
Lead	**3.4**	3.0	"	"	"	"	"	"	
Molybdenum	ND	1.0	"	"	"	"	"	"	
Nickel	**5.1**	2.0	"	"	"	"	"	"	
Selenium	ND	5.0	"	"	"	"	"	"	
Thallium	ND	2.0	"	"	"	"	"	"	
Vanadium	**17**	5.0	"	"	"	"	"	"	
Zinc	**22**	1.0	"	"	"	"	"	"	
Cold Vapor Extraction EPA 7470/7471									
Mercury	ND	0.10	mg/kg	1	6092611	09/26/06	10/03/06	EPA 7471A Soil	
Conventional Chemistry Parameters by APHA/EPA Methods									
pH	**7.8**		pH Units	1	6092706	09/27/06	09/29/06	EPA 9045B	

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PSI - Long Beach	Project: KEN-1	
3960 Gilman Street	Project Number: 559-6G017	**Reported:**
Long Beach CA, 90815	Project Manager: Eric Fraske	10/03/06 16:02

B4-5
T601317-70 (Soil)

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Not
SunStar Laboratories, Inc.									
Metals by EPA 6010B									
Antimony	ND	3.0	mg/kg	1	6092606	09/26/06	09/28/06	EPA 6010B	
Silver	ND	2.0	"	"	"	"	"	"	
Arsenic	ND	0.22	"	"	"	"	"	"	
Barium	**91**	1.0	"	"	"	"	"	"	
Beryllium	ND	1.0	"	"	"	"	"	"	
Cadmium	ND	1.6	"	"	"	"	"	"	
Chromium	**9.1**	2.0	"	"	"	"	"	"	
Cobalt	**6.4**	2.0	"	"	"	"	"	"	
Copper	**19**	1.0	"	"	"	"	"	"	
Lead	ND	3.0	"	"	"	"	"	"	
Molybdenum	ND	1.0	"	"	"	"	"	"	
Nickel	**6.8**	2.0	"	"	"	"	"	"	
Selenium	ND	5.0	"	"	"	"	"	"	
Thallium	ND	2.0	"	"	"	"	"	"	
Vanadium	**21**	5.0	"	"	"	"	"	"	
Zinc	**31**	1.0	"	"	"	"	"	"	
Cold Vapor Extraction EPA 7470/7471									
Mercury	ND	0.10	mg/kg	1	6092611	09/26/06	10/03/06	EPA 7471A Soil	
Conventional Chemistry Parameters by APHA/EPA Methods									
pH	**7.8**		pH Units	1	6092706	09/27/06	09/29/06	EPA 9045B	



PSI - Long Beach	Project: KEN-1	
3960 Gilman Street	Project Number: 559-6G017	**Reported:**
Long Beach CA, 90815	Project Manager: Eric Fraske	10/03/06 16:02

B4-10
T601317-71 (Soil)

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Not
SunStar Laboratories, Inc.									
Metals by EPA 6010B									
Antimony	ND	3.0	mg/kg	1	6092606	09/26/06	09/28/06	EPA 6010B	
Silver	ND	2.0	"	"	"	"	"	"	
Arsenic	ND	0.22	"	"	"	"	"	"	
Barium	**230**	1.0	"	"	"	"	"	"	
Beryllium	ND	1.0	"	"	"	"	"	"	
Cadmium	ND	1.6	"	"	"	"	"	"	
Chromium	**7.6**	2.0	"	"	"	"	"	"	
Cobalt	**9.6**	2.0	"	"	"	"	"	"	
Copper	**7.3**	1.0	"	"	"	"	"	"	
Lead	ND	3.0	"	"	"	"	"	"	
Molybdenum	ND	1.0	"	"	"	"	"	"	
Nickel	**5.0**	2.0	"	"	"	"	"	"	
Selenium	ND	5.0	"	"	"	"	"	"	
Thallium	ND	2.0	"	"	"	"	"	"	
Vanadium	**26**	5.0	"	"	"	"	"	"	
Zinc	**24**	1.0	"	"	"	"	"	"	
Cold Vapor Extraction EPA 7470/7471									
Mercury	ND	0.10	mg/kg	1	6092611	09/26/06	10/03/06	EPA 7471A Soil	
Conventional Chemistry Parameters by APHA/EPA Methods									
pH	**7.8**		pH Units	1	6092706	09/27/06	09/29/06	EPA 9045B	

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John J. Hyl

PSI - Long Beach	Project: KEN-1	
3960 Gilman Street	Project Number: 559-6G017	**Reported:**
Long Beach CA, 90815	Project Manager: Eric Fraske	10/03/06 16:02

B4-15
T601317-72 (Soil)

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Not
SunStar Laboratories, Inc.									
Metals by EPA 6010B									
Antimony	ND	3.0	mg/kg	1	6092606	09/26/06	09/28/06	EPA 6010B	
Silver	ND	2.0	"	"	"	"	"	"	
Arsenic	ND	0.22	"	"	"	"	"	"	
Barium	**96**	1.0	"	"	"	"	"	"	
Beryllium	ND	1.0	"	"	"	"	"	"	
Cadmium	ND	1.6	"	"	"	"	"	"	
Chromium	**10**	2.0	"	"	"	"	"	"	
Cobalt	**8.7**	2.0	"	"	"	"	"	"	
Copper	**11**	1.0	"	"	"	"	"	"	
Lead	ND	3.0	"	"	"	"	"	"	
Molybdenum	ND	1.0	"	"	"	"	"	"	
Nickel	**7.6**	2.0	"	"	"	"	"	"	
Selenium	ND	5.0	"	"	"	"	"	"	
Thallium	ND	2.0	"	"	"	"	"	"	
Vanadium	**26**	5.0	"	"	"	"	"	"	
Zinc	**33**	1.0	"	"	"	"	"	"	
Cold Vapor Extraction EPA 7470/7471									
Mercury	ND	0.10	mg/kg	1	6092611	09/26/06	10/03/06	EPA 7471A Soil	
Conventional Chemistry Parameters by APHA/EPA Methods									
pH	**7.7**		pH Units	1	6092706	09/27/06	09/29/06	EPA 9045B	

PSI - Long Beach	Project: KEN-1	
3960 Gilman Street	Project Number: 559-6G017	**Reported:**
Long Beach CA, 90815	Project Manager: Eric Fraske	10/03/06 16:02

B5-1
T601317-73 (Soil)

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Not
SunStar Laboratories, Inc.									
Metals by EPA 6010B									
Antimony	ND	3.0	mg/kg	1	6092606	09/26/06	09/28/06	EPA 6010B	
Silver	ND	2.0	"	"	"	"	"	"	
Arsenic	ND	0.22	"	"	"	"	"	"	
Barium	**160**	1.0	"	"	"	"	"	"	
Beryllium	ND	1.0	"	"	"	"	"	"	
Cadmium	ND	1.6	"	"	"	"	"	"	
Chromium	**13**	2.0	"	"	"	"	"	"	
Cobalt	**8.6**	2.0	"	"	"	"	"	"	
Copper	**19**	1.0	"	"	"	"	"	"	
Lead	**30**	3.0	"	"	"	"	"	"	
Molybdenum	ND	1.0	"	"	"	"	"	"	
Nickel	**9.6**	2.0	"	"	"	"	"	"	
Selenium	ND	5.0	"	"	"	"	"	"	
Thallium	ND	2.0	"	"	"	"	"	"	
Vanadium	**30**	5.0	"	"	"	"	"	"	
Zinc	**130**	1.0	"	"	"	"	"	"	
Cold Vapor Extraction EPA 7470/7471									
Mercury	ND	0.10	mg/kg	1	6092611	09/26/06	10/03/06	EPA 7471A Soil	
Conventional Chemistry Parameters by APHA/EPA Methods									
pH	**8.0**		pH Units	1	6092706	09/27/06	09/29/06	EPA 9045B	

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PSI - Long Beach	Project: KEN-1	
3960 Gilman Street	Project Number: 559-6G017	**Reported:**
Long Beach CA, 90815	Project Manager: Eric Fraske	10/03/06 16:02

B5-5
T601317-74 (Soil)

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Not
SunStar Laboratories, Inc.									
Metals by EPA 6010B									
Antimony	ND	3.0	mg/kg	1	6092606	09/26/06	09/28/06	EPA 6010B	
Silver	ND	2.0	"	"	"	"	"	"	
Arsenic	ND	0.22	"	"	"	"	"	"	
Barium	**65**	1.0	"	"	"	"	"	"	
Beryllium	ND	1.0	"	"	"	"	"	"	
Cadmium	ND	1.6	"	"	"	"	"	"	
Chromium	**7.8**	2.0	"	"	"	"	"	"	
Cobalt	**5.9**	2.0	"	"	"	"	"	"	
Copper	**4.8**	1.0	"	"	"	"	"	"	
Lead	ND	3.0	"	"	"	"	"	"	
Molybdenum	ND	1.0	"	"	"	"	"	"	
Nickel	**4.5**	2.0	"	"	"	"	"	"	
Selenium	ND	5.0	"	"	"	"	"	"	
Thallium	ND	2.0	"	"	"	"	"	"	
Vanadium	**25**	5.0	"	"	"	"	"	"	
Zinc	**26**	1.0	"	"	"	"	"	"	
Cold Vapor Extraction EPA 7470/7471									
Mercury	ND	0.10	mg/kg	1	6092611	09/26/06	10/03/06	EPA 7471A Soil	
Conventional Chemistry Parameters by APHA/EPA Methods									
pH	**8.3**		pH Units	1	6092706	09/27/06	09/29/06	EPA 9045B	

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John J. Light

PSI - Long Beach	Project: KEN-1	
3960 Gilman Street	Project Number: 559-6G017	**Reported:**
Long Beach CA, 90815	Project Manager: Eric Fraske	10/03/06 16:02

B5-10
T601317-75 (Soil)

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Not
SunStar Laboratories, Inc.									
Metals by EPA 6010B									
Antimony	ND	3.0	mg/kg	1	6092606	09/26/06	09/28/06	EPA 6010B	
Silver	ND	2.0	"	"	"	"	"	"	
Arsenic	ND	0.22	"	"	"	"	"	"	
Barium	**78**	1.0	"	"	"	"	"	"	
Beryllium	ND	1.0	"	"	"	"	09/28/06	"	
Cadmium	ND	1.6	"	"	"	"	09/28/06	"	
Chromium	**7.5**	2.0	"	"	"	"	"	"	
Cobalt	**5.6**	2.0	"	"	"	"	"	"	
Copper	**24**	1.0	"	"	"	"	"	"	
Lead	ND	3.0	"	"	"	"	"	"	
Molybdenum	ND	1.0	"	"	"	"	"	"	
Nickel	**4.9**	2.0	"	"	"	"	"	"	
Selenium	ND	5.0	"	"	"	"	"	"	
Thallium	ND	2.0	"	"	"	"	"	"	
Vanadium	**21**	5.0	"	"	"	"	"	"	
Zinc	**37**	1.0	"	"	"	"	"	"	
Cold Vapor Extraction EPA 7470/7471									
Mercury	ND	0.10	mg/kg	1	6092611	09/26/06	10/03/06	EPA 7471A Soil	
Conventional Chemistry Parameters by APHA/EPA Methods									
pH	**8.0**		pH Units	1	6092706	09/27/06	09/29/06	EPA 9045B	

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PSI - Long Beach	Project: KEN-1	
3960 Gilman Street	Project Number: 559-6G017	**Reported:**
Long Beach CA, 90815	Project Manager: Eric Fraske	10/03/06 16:02

B5-15
T601317-76 (Soil)

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Not
SunStar Laboratories, Inc.									
Metals by EPA 6010B									
Antimony	ND	3.0	mg/kg	1	6092606	09/26/06	09/28/06	EPA 6010B	
Silver	ND	2.0	"	"	"	"	"	"	
Arsenic	ND	0.22	"	"	"	"	"	"	
Barium	**96**	1.0	"	"	"	"	"	"	
Beryllium	ND	1.0	"	"	"	"	09/28/06	"	
Cadmium	ND	1.6	"	"	"	"	09/28/06	"	
Chromium	**12**	2.0	"	"	"	"	"	"	
Cobalt	**7.3**	2.0	"	"	"	"	"	"	
Copper	**15**	1.0	"	"	"	"	"	"	
Lead	**6.3**	3.0	"	"	"	"	"	"	
Molybdenum	ND	1.0	"	"	"	"	"	"	
Nickel	**7.2**	2.0	"	"	"	"	"	"	
Selenium	ND	5.0	"	"	"	"	"	"	
Thallium	ND	2.0	"	"	"	"	"	"	
Vanadium	**27**	5.0	"	"	"	"	"	"	
Zinc	**49**	1.0	"	"	"	"	"	"	
Cold Vapor Extraction EPA 7470/7471									
Mercury	ND	0.10	mg/kg	1	6092611	09/26/06	10/03/06	EPA 7471A Soil	
Conventional Chemistry Parameters by APHA/EPA Methods									
pH	**8.1**		pH Units	1	6092706	09/27/06	09/29/06	EPA 9045B	

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PSI - Long Beach	Project: KEN-1	
3960 Gilman Street	Project Number: 559-6G017	**Reported:**
Long Beach CA, 90815	Project Manager: Eric Fraske	10/03/06 16:02

A

T601317-77 (Soil)

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Not
SunStar Laboratories, Inc.									
Metals by EPA 6010B									
Antimony	ND	3.0	mg/kg	1	6092606	09/26/06	09/28/06	EPA 6010B	
Silver	ND	2.0	"	"	"	"	"	"	
Arsenic	**0.30**	0.22	"	"	"	"	"	"	
Barium	**190**	1.0	"	"	"	"	"	"	
Beryllium	ND	1.0	"	"	"	"	"	"	
Cadmium	ND	1.6	"	"	"	"	"	"	
Chromium	**25**	2.0	"	"	"	"	"	"	
Cobalt	**9.3**	2.0	"	"	"	"	"	"	
Copper	**43**	1.0	"	"	"	"	"	"	
Lead	**110**	3.0	"	"	"	"	"	"	
Molybdenum	ND	1.0	"	"	"	"	"	"	
Nickel	**14**	2.0	"	"	"	"	"	"	
Selenium	ND	5.0	"	"	"	"	"	"	
Thallium	ND	2.0	"	"	"	"	"	"	
Vanadium	**32**	5.0	"	"	"	"	"	"	
Zinc	**200**	1.0	"	"	"	"	"	"	
Cold Vapor Extraction EPA 7470/7471									
Mercury	**0.17**	0.10	mg/kg	1	6092611	09/26/06	10/03/06	EPA 7471A Soil	
Conventional Chemistry Parameters by APHA/EPA Methods									
pH	**8.8**		pH Units	1	6092706	09/27/06	09/29/06	EPA 9045B	

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PSI - Long Beach	Project: KEN-1	
3960 Gilman Street	Project Number: 559-6G017	**Reported:**
Long Beach CA, 90815	Project Manager: Eric Fraske	10/03/06 16:02

B

T601317-78 (Soil)

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Not
			SunStar Laboratories, Inc.						
Metals by EPA 6010B									
Antimony	ND	3.0	mg/kg	1	6092606	09/26/06	09/28/06	EPA 6010B	
Silver	ND	2.0	"	"	"	"	"	"	
Arsenic	ND	0.22	"	"	"	"	"	"	
Barium	**15**	1.0	"	"	"	"	"	"	
Beryllium	ND	1.0	"	"	"	"	"	"	
Cadmium	ND	1.6	"	"	"	"	"	"	
Chromium	ND	2.0	"	"	"	"	"	"	
Cobalt	ND	2.0	"	"	"	"	"	"	
Copper	**2.2**	1.0	"	"	"	"	"	"	
Lead	ND	3.0	"	"	"	"	"	"	
Molybdenum	ND	1.0	"	"	"	"	"	"	
Nickel	ND	2.0	"	"	"	"	"	"	
Selenium	ND	5.0	"	"	"	"	"	"	
Thallium	ND	2.0	"	"	"	"	"	"	
Vanadium	ND	5.0	"	"	"	"	"	"	
Zinc	**8.2**	1.0	"	"	"	"	"	"	
Cold Vapor Extraction EPA 7470/7471									
Mercury	ND	0.10	mg/kg	1	6092611	09/26/06	10/03/06	EPA 7471A Soil	
Conventional Chemistry Parameters by APHA/EPA Methods									
pH	**8.1**		pH Units	1	6092706	09/27/06	09/29/06	EPA 9045B	

SunStar Laboratories, Inc.

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PSI - Long Beach	Project: KEN-1	
3960 Gilman Street	Project Number: 559-6G017	**Reported:**
Long Beach CA, 90815	Project Manager: Eric Fraske	10/03/06 16:02

C

T601317-79 (Soil)

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Not
SunStar Laboratories, Inc.									
Metals by EPA 6010B									
Antimony	ND	3.0	mg/kg	1	6092606	09/26/06	09/28/06	EPA 6010B	
Silver	ND	2.0	"	"	"	"	"	"	
Arsenic	ND	0.22	"	"	"	"	"	"	
Barium	**110**	1.0	"	"	"	"	"	"	
Beryllium	ND	1.0	"	"	"	"	"	"	
Cadmium	ND	1.6	"	"	"	"	"	"	
Chromium	**11**	2.0	"	"	"	"	"	"	
Cobalt	**7.3**	2.0	"	"	"	"	"	"	
Copper	**18**	1.0	"	"	"	"	"	"	
Lead	ND	3.0	"	"	"	"	"	"	
Molybdenum	ND	1.0	"	"	"	"	"	"	
Nickel	**7.8**	2.0	"	"	"	"	"	"	
Selenium	ND	5.0	"	"	"	"	"	"	
Thallium	ND	2.0	"	"	"	"	"	"	
Vanadium	**25**	5.0	"	"	"	"	"	"	
Zinc	**39**	1.0	"	"	"	"	"	"	
Cold Vapor Extraction EPA 7470/7471									
Mercury	ND	0.10	mg/kg	1	6092611	09/26/06	10/03/06	EPA 7471A Soil	
Conventional Chemistry Parameters by APHA/EPA Methods									
pH	**7.7**		pH Units	1	6092706	09/27/06	09/29/06	EPA 9045B	

PSI - Long Beach	Project: KEN-1	
3960 Gilman Street	Project Number: 559-6G017	**Reported:**
Long Beach CA, 90815	Project Manager: Eric Fraske	10/03/06 16:02

D

T601317-80 (Soil)

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Not
SunStar Laboratories, Inc.									
Metals by EPA 6010B									
Antimony	ND	3.0	mg/kg	1	6092607	09/26/06	09/29/06	EPA 6010B	
Silver	ND	2.0	"	"	"	"	"	"	
Arsenic	ND	0.22	"	"	"	"	"	"	
Barium	**130**	1.0	"	"	"	"	"	"	
Beryllium	ND	1.0	"	"	"	"	"	"	
Cadmium	ND	1.6	"	"	"	"	"	"	
Chromium	**14**	2.0	"	"	"	"	"	"	
Cobalt	**9.1**	2.0	"	"	"	"	"	"	
Copper	**16**	1.0	"	"	"	"	"	"	
Lead	**5.5**	3.0	"	"	"	"	"	"	
Molybdenum	ND	1.0	"	"	"	"	"	"	
Nickel	**11**	2.0	"	"	"	"	"	"	
Selenium	ND	5.0	"	"	"	"	"	"	
Thallium	ND	2.0	"	"	"	"	"	"	
Vanadium	**34**	5.0	"	"	"	"	"	"	
Zinc	**47**	1.0	"	"	"	"	"	"	
Cold Vapor Extraction EPA 7470/7471									
Mercury	ND	0.10	mg/kg	1	6092612	09/26/06	10/03/06	EPA 7471A Soil	
Conventional Chemistry Parameters by APHA/EPA Methods									
pH	**7.3**		pH Units	1	6092706	09/27/06	09/29/06	EPA 9045B	

PSI - Long Beach	Project: KEN-1	
3960 Gilman Street	Project Number: 559-6G017	**Reported:**
Long Beach CA, 90815	Project Manager: Eric Fraske	10/03/06 16:02

E

T601317-81 (Soil)

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Not
SunStar Laboratories, Inc.									
Metals by EPA 6010B									
Antimony	ND	3.0	mg/kg	1	6092607	09/26/06	09/29/06	EPA 6010B	
Silver	ND	2.0	"	"	"	"	"	"	
Arsenic	ND	0.22	"	"	"	"	"	"	
Barium	**110**	1.0	"	"	"	"	"	"	
Beryllium	ND	1.0	"	"	"	"	09/29/06	"	
Cadmium	**2.5**	1.6	"	"	"	"	09/29/06	"	
Chromium	**14**	2.0	"	"	"	"	"	"	
Cobalt	**9.1**	2.0	"	"	"	"	"	"	
Copper	**14**	1.0	"	"	"	"	"	"	
Lead	**5.7**	3.0	"	"	"	"	"	"	
Molybdenum	ND	1.0	"	"	"	"	"	"	
Nickel	**8.3**	2.0	"	"	"	"	"	"	
Selenium	ND	5.0	"	"	"	"	"	"	
Thallium	ND	2.0	"	"	"	"	"	"	
Vanadium	**31**	5.0	"	"	"	"	"	"	
Zinc	**50**	1.0	"	"	"	"	"	"	
Cold Vapor Extraction EPA 7470/7471									
Mercury	**0.22**	0.10	mg/kg	1	6092612	09/26/06	10/03/06	EPA 7471A Soil	
Conventional Chemistry Parameters by APHA/EPA Methods									
pH	**6.7**		pH Units	1	6092707	09/27/06	09/29/06	EPA 9045B	

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PSI - Long Beach	Project: KEN-1	
3960 Gilman Street	Project Number: 559-6G017	**Reported:**
Long Beach CA, 90815	Project Manager: Eric Fraske	10/03/06 16:02

F

T601317-82 (Soil)

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Not
SunStar Laboratories, Inc.									
Metals by EPA 6010B									
Antimony	ND	3.0	mg/kg	1	6092607	09/26/06	09/29/06	EPA 6010B	
Silver	ND	2.0	"	"	"	"	"	"	
Arsenic	ND	0.22	"	"	"	"	"	"	
Barium	**81**	1.0	"	"	"	"	"	"	
Beryllium	ND	1.0	"	"	"	"	09/29/06	"	
Cadmium	ND	1.6	"	"	"	"	09/29/06	"	
Chromium	**9.3**	2.0	"	"	"	"	"	"	
Cobalt	**7.5**	2.0	"	"	"	"	"	"	
Copper	**14**	1.0	"	"	"	"	"	"	
Lead	ND	3.0	"	"	"	"	"	"	
Molybdenum	ND	1.0	"	"	"	"	"	"	
Nickel	**5.6**	2.0	"	"	"	"	"	"	
Selenium	ND	5.0	"	"	"	"	"	"	
Thallium	ND	2.0	"	"	"	"	"	"	
Vanadium	**26**	5.0	"	"	"	"	"	"	
Zinc	**38**	1.0	"	"	"	"	"	"	
Cold Vapor Extraction EPA 7470/7471									
Mercury	ND	0.10	mg/kg	1	6092612	09/26/06	10/03/06	EPA 7471A Soil	
Conventional Chemistry Parameters by APHA/EPA Methods									
pH	**7.4**		pH Units	1	6092707	09/27/06	09/29/06	EPA 9045B	



PSI - Long Beach	Project: KEN-1	
3960 Gilman Street	Project Number: 559-6G017	**Reported:**
Long Beach CA, 90815	Project Manager: Eric Fraske	10/03/06 16:02

G

T601317-83 (Soil)

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Not
SunStar Laboratories, Inc.									
Metals by EPA 6010B									
Antimony	ND	3.0	mg/kg	1	6092607	09/26/06	09/29/06	EPA 6010B	
Silver	ND	2.0	"	"	"	"	"	"	
Arsenic	ND	0.22	"	"	"	"	"	"	
Barium	**65**	1.0	"	"	"	"	"	"	
Beryllium	ND	1.0	"	"	"	"	"	"	
Cadmium	ND	1.6	"	"	"	"	"	"	
Chromium	**6.3**	2.0	"	"	"	"	"	"	
Cobalt	**5.1**	2.0	"	"	"	"	"	"	
Copper	**5.0**	1.0	"	"	"	"	"	"	
Lead	ND	3.0	"	"	"	"	"	"	
Molybdenum	ND	1.0	"	"	"	"	"	"	
Nickel	**4.5**	2.0	"	"	"	"	"	"	
Selenium	ND	5.0	"	"	"	"	"	"	
Thallium	ND	2.0	"	"	"	"	"	"	
Vanadium	**20**	5.0	"	"	"	"	"	"	
Zinc	**25**	1.0	"	"	"	"	"	"	
Cold Vapor Extraction EPA 7470/7471									
Mercury	ND	0.10	mg/kg	1	6092612	09/26/06	10/03/06	EPA 7471A Soil	
Conventional Chemistry Parameters by APHA/EPA Methods									
pH	**7.8**		pH Units	1	6092707	09/27/06	09/29/06	EPA 9045B	



PSI - Long Beach	Project: KEN-1	
3960 Gilman Street	Project Number: 559-6G017	**Reported:**
Long Beach CA, 90815	Project Manager: Eric Fraske	10/03/06 16:02

H

T601317-84 (Soil)

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Not
			SunStar Laboratories, Inc.						
Metals by EPA 6010B									
Antimony	ND	3.0	mg/kg	1	6092607	09/26/06	09/29/06	EPA 6010B	
Silver	ND	2.0	"	"	"	"	"	"	
Arsenic	ND	0.22	"	"	"	"	"	"	
Barium	**160**	1.0	"	"	"	"	"	"	
Beryllium	ND	1.0	"	"	"	"	"	"	
Cadmium	ND	1.6	"	"	"	"	"	"	
Chromium	**16**	2.0	"	"	"	"	"	"	
Cobalt	**12**	2.0	"	"	"	"	"	"	
Copper	**16**	1.0	"	"	"	"	"	"	
Lead	**4.0**	3.0	"	"	"	"	"	"	
Molybdenum	ND	1.0	"	"	"	"	"	"	
Nickel	**11**	2.0	"	"	"	"	"	"	
Selenium	ND	5.0	"	"	"	"	"	"	
Thallium	ND	2.0	"	"	"	"	"	"	
Vanadium	**41**	5.0	"	"	"	"	"	"	
Zinc	**58**	1.0	"	"	"	"	"	"	
Cold Vapor Extraction EPA 7470/7471									
Mercury	**0.10**	0.10	mg/kg	1	6092612	09/26/06	10/03/06	EPA 7471A Soil	
Conventional Chemistry Parameters by APHA/EPA Methods									
pH	**7.3**		pH Units	1	6092707	09/27/06	09/29/06	EPA 9045B	

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PSI - Long Beach	Project: KEN-1	
3960 Gilman Street	Project Number: 559-6G017	**Reported:**
Long Beach CA, 90815	Project Manager: Eric Fraske	10/03/06 16:02

Metals by EPA 6010B - Quality Control

SunStar Laboratories, Inc.

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Batch 6092603 - EPA 3051										
Blank (6092603-BLK1)				Prepared: 09/26/06 Analyzed: 09/27/06						
Antimony	ND	3.0	mg/kg							
Silver	ND	2.0	"							
Arsenic	ND	0.22	"							
Barium	ND	1.0	"							
Beryllium	ND	1.0	"							
Cadmium	ND	1.6	"							
Chromium	ND	2.0	"							
Cobalt	ND	2.0	"							
Copper	ND	1.0	"							
Lead	ND	3.0	"							
Molybdenum	ND	1.0	"							
Nickel	ND	2.0	"							
Selenium	ND	5.0	"							
Thallium	ND	2.0	"							
Vanadium	ND	5.0	"							
Zinc	ND	1.0	"							
LCS (6092603-BS1)				Prepared: 09/26/06 Analyzed: 09/28/06						
Arsenic	112	0.22	mg/kg	100		112	75-125			
Barium	113	1.0	"	100		113	75-125			
Cadmium	120	1.6	"	100		120	75-125			
Chromium	116	2.0	"	100		116	75-125			
Lead	119	3.0	"	100		119	75-125			
Matrix Spike (6092603-MS1)	**Source: T601317-17**			Prepared: 09/26/06 Analyzed: 09/28/06						
Arsenic	98.3	0.22	mg/kg	100	ND	98.3	75-125			
Barium	293	1.0	"	100	150	143	75-125			QM-4
Cadmium	109	1.6	"	100	0.82	108	75-125			
Chromium	133	2.0	"	100	14	119	75-125			
Lead	105	3.0	"	100	4.0	101	75-125			

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PSI - Long Beach	Project: KEN-1	
3960 Gilman Street	Project Number: 559-6G017	**Reported:**
Long Beach CA, 90815	Project Manager: Eric Fraske	10/03/06 16:02

Metals by EPA 6010B - Quality Control

SunStar Laboratories, Inc.

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Batch 6092603 - EPA 3051										
Matrix Spike Dup (6092603-MSD1)	**Source: T601317-17**			Prepared: 09/26/06 Analyzed: 09/28/06						
Arsenic	91.4	0.22	mg/kg	100	ND	91.4	75-125	7.27	20	
Barium	285	1.0	"	100	150	135	75-125	2.77	20	QM-4
Cadmium	98.6	1.6	"	100	0.82	97.8	75-125	10.0	20	
Chromium	131	2.0	"	100	14	117	75-125	1.52	20	
Lead	100	3.0	"	100	4.0	96.0	75-125	4.88	20	
Batch 6092604 - EPA 3051										
Blank (6092604-BLK1)				Prepared: 09/26/06 Analyzed: 09/28/06						
Antimony	ND	3.0	mg/kg							
Silver	ND	2.0	"							
Arsenic	ND	0.22	"							
Barium	ND	1.0	"							
Beryllium	ND	1.0	"							
Cadmium	ND	1.6	"							
Chromium	ND	2.0	"							
Cobalt	ND	2.0	"							
Copper	ND	1.0	"							
Lead	ND	3.0	"							
Molybdenum	ND	1.0	"							
Nickel	ND	2.0	"							
Selenium	ND	5.0	"							
Thallium	ND	2.0	"							
Vanadium	ND	5.0	"							
Zinc	ND	1.0	"							
LCS (6092604-BS1)				Prepared: 09/26/06 Analyzed: 09/28/06						
Arsenic	112	0.22	mg/kg	100		112	75-125			
Barium	118	1.0	"	100		118	75-125			
Cadmium	118	1.6	"	100		118	75-125			
Chromium	115	2.0	"	100		115	75-125			
Lead	118	3.0	"	100		118	75-125			

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PSI - Long Beach	Project: KEN-1	
3960 Gilman Street	Project Number: 559-6G017	**Reported:**
Long Beach CA, 90815	Project Manager: Eric Fraske	10/03/06 16:02

Metals by EPA 6010B - Quality Control

SunStar Laboratories, Inc.

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Batch 6092604 - EPA 3051										
Matrix Spike (6092604-MS1)	**Source: T601317-23**			Prepared: 09/26/06 Analyzed: 09/28/06						
Arsenic	100	0.22	mg/kg	100	ND	100	75-125			
Barium	234	1.0	"	100	130	104	75-125			
Cadmium	101	1.6	"	100	0.65	100	75-125			
Chromium	126	2.0	"	100	15	111	75-125			
Lead	105	3.0	"	100	2.8	102	75-125			
Matrix Spike Dup (6092604-MSD1)	**Source: T601317-23**			Prepared: 09/26/06 Analyzed: 09/28/06						
Arsenic	104	0.22	mg/kg	100	ND	104	75-125	3.92	20	
Barium	220	1.0	"	100	130	90.0	75-125	6.17	20	
Cadmium	109	1.6	"	100	0.65	108	75-125	7.62	20	
Chromium	140	2.0	"	100	15	125	75-125	10.5	20	
Lead	113	3.0	"	100	2.8	110	75-125	7.34	20	
Batch 6092605 - EPA 3051										
Blank (6092605-BLK1)				Prepared: 09/26/06 Analyzed: 09/28/06						
Antimony	ND	3.0	mg/kg							
Silver	ND	2.0	"							
Arsenic	ND	0.22	"							
Barium	ND	1.0	"							
Beryllium	ND	1.0	"							
Cadmium	ND	1.6	"							
Chromium	ND	2.0	"							
Cobalt	ND	2.0	"							
Copper	ND	1.0	"							
Lead	ND	3.0	"							
Molybdenum	ND	1.0	"							
Nickel	ND	2.0	"							
Selenium	ND	5.0	"							
Thallium	ND	2.0	"							
Vanadium	ND	5.0	"							
Zinc	ND	1.0	"							



PSI - Long Beach	Project: KEN-1	
3960 Gilman Street	Project Number: 559-6G017	**Reported:**
Long Beach CA, 90815	Project Manager: Eric Fraske	10/03/06 16:02

Metals by EPA 6010B - Quality Control

SunStar Laboratories, Inc.

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Batch 6092605 - EPA 3051										
LCS (6092605-BS1)				Prepared: 09/26/06 Analyzed: 09/28/06						
Arsenic	107	0.22	mg/kg	100		107	75-125			
Barium	109	1.0	"	100		109	75-125			
Cadmium	109	1.6	"	100		109	75-125			
Chromium	109	2.0	"	100		109	75-125			
Lead	110	3.0	"	100		110	75-125			
Matrix Spike (6092605-MS1)		**Source: T601317-50**		Prepared: 09/26/06 Analyzed: 09/28/06						
Arsenic	107	0.22	mg/kg	100	1.8	105	75-125			
Barium	334	1.0	"	100	210	124	75-125			
Cadmium	104	1.6	"	100	2.3	102	75-125			
Chromium	142	2.0	"	100	26	116	75-125			
Lead	188	3.0	"	100	77	111	75-125			
Matrix Spike Dup (6092605-MSD1)		**Source: T601317-50**		Prepared: 09/26/06 Analyzed: 09/28/06						
Arsenic	112	0.22	mg/kg	100	1.8	110	75-125	4.57	20	
Barium	344	1.0	"	100	210	134	75-125	2.95	20	QM-4
Cadmium	114	1.6	"	100	2.3	112	75-125	9.17	20	
Chromium	145	2.0	"	100	26	119	75-125	2.09	20	
Lead	197	3.0	"	100	77	120	75-125	4.68	20	
Batch 6092606 - EPA 3051										
Blank (6092606-BLK1)				Prepared: 09/26/06 Analyzed: 09/28/06						
Antimony	ND	3.0	mg/kg							
Silver	ND	2.0	"							
Arsenic	ND	0.22	"							
Barium	1.29	1.0	"							QB-4
Beryllium	ND	1.0	"							
Cadmium	ND	1.6	"							
Chromium	ND	2.0	"							
Cobalt	ND	2.0	"							
Copper	ND	1.0	"							
Lead	ND	3.0	"							
Molybdenum	ND	1.0	"							
Nickel	ND	2.0	"							
Selenium	ND	5.0	"							
Thallium	ND	2.0	"							
Vanadium	ND	5.0	"							
Zinc	ND	1.0	"							

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PSI - Long Beach	Project: KEN-1	
3960 Gilman Street	Project Number: 559-6G017	**Reported:**
Long Beach CA, 90815	Project Manager: Eric Fraske	10/03/06 16:02

Metals by EPA 6010B - Quality Control

SunStar Laboratories, Inc.

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Batch 6092606 - EPA 3051										
LCS (6092606-BS1)				Prepared: 09/26/06 Analyzed: 09/28/06						
Arsenic	111	0.22	mg/kg	100		111	75-125			
Barium	114	1.0	"	100		114	75-125			
Cadmium	118	1.6	"	100		118	75-125			
Chromium	114	2.0	"	100		114	75-125			
Lead	118	3.0	"	100		118	75-125			
Matrix Spike (6092606-MS1)		Source: T601317-75		Prepared: 09/26/06 Analyzed: 09/28/06						
Arsenic	96.7	0.22	mg/kg	100	ND	96.7	75-125			
Barium	174	1.0	"	100	78	96.0	75-125			
Cadmium	97.8	1.6	"	100	ND	97.8	75-125			
Chromium	111	2.0	"	100	7.5	104	75-125			
Lead	101	3.0	"	100	2.5	98.5	75-125			
Matrix Spike Dup (6092606-MSD1)		Source: T601317-75		Prepared: 09/26/06 Analyzed: 09/28/06						
Arsenic	101	0.22	mg/kg	100	ND	101	75-125	4.35	20	
Barium	183	1.0	"	100	78	105	75-125	5.04	20	
Cadmium	103	1.6	"	100	ND	103	75-125	5.18	20	
Chromium	116	2.0	"	100	7.5	108	75-125	4.41	20	
Lead	103	3.0	"	100	2.5	100	75-125	1.96	20	
Batch 6092607 - EPA 3051										
Blank (6092607-BLK1)				Prepared: 09/26/06 Analyzed: 09/29/06						
Antimony	ND	3.0	mg/kg							
Silver	ND	2.0	"							
Arsenic	ND	0.22	"							
Barium	ND	1.0	"							
Beryllium	ND	1.0	"							
Cadmium	ND	1.6	"							
Chromium	ND	2.0	"							
Cobalt	ND	2.0	"							
Copper	ND	1.0	"							
Lead	ND	3.0	"							
Molybdenum	ND	1.0	"							
Nickel	ND	2.0	"							
Selenium	ND	5.0	"							
Thallium	ND	2.0	"							
Vanadium	ND	5.0	"							
Zinc	ND	1.0	"							

PSI - Long Beach	Project: KEN-1	
3960 Gilman Street	Project Number: 559-6G017	**Reported:**
Long Beach CA, 90815	Project Manager: Eric Fraske	10/03/06 16:02

Metals by EPA 6010B - Quality Control

SunStar Laboratories, Inc.

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Batch 6092607 - EPA 3051										
LCS (6092607-BS1)				Prepared: 09/26/06 Analyzed: 09/29/06						
Arsenic	111	0.22	mg/kg	100		111	75-125			
Barium	113	1.0	"	100		113	75-125			
Cadmium	114	1.6	"	100		114	75-125			
Chromium	115	2.0	"	100		115	75-125			
Lead	116	3.0	"	100		116	75-125			
Matrix Spike (6092607-MS1)	**Source: T601317-81**			Prepared: 09/26/06 Analyzed: 09/29/06						
Arsenic	101	0.22	mg/kg	100	ND	101	75-125			
Barium	212	1.0	"	100	110	102	75-125			
Cadmium	95.6	1.6	"	100	2.5	93.1	75-125			
Chromium	121	2.0	"	100	14	107	75-125			
Lead	103	3.0	"	100	5.7	97.3	75-125			
Matrix Spike Dup (6092607-MSD1)	**Source: T601317-81**			Prepared: 09/26/06 Analyzed: 09/29/06						
Arsenic	98.4	0.22	mg/kg	100	ND	98.4	75-125	2.61	20	
Barium	209	1.0	"	100	110	99.0	75-125	1.43	20	
Cadmium	93.8	1.6	"	100	2.5	91.3	75-125	1.90	20	
Chromium	119	2.0	"	100	14	105	75-125	1.67	20	
Lead	101	3.0	"	100	5.7	95.3	75-125	1.96	20	

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PSI - Long Beach	Project: KEN-1	
3960 Gilman Street	Project Number: 559-6G017	**Reported:**
Long Beach CA, 90815	Project Manager: Eric Fraske	10/03/06 16:02

Cold Vapor Extraction EPA 7470/7471 - Quality Control

SunStar Laboratories, Inc.

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Batch 6092608 - EPA 7471A Soil										
Blank (6092608-BLK1)				Prepared: 09/26/06 Analyzed: 09/29/06						
Mercury	ND	0.10	mg/kg							
LCS (6092608-BS1)				Prepared: 09/26/06 Analyzed: 09/29/06						
Mercury	2.02	0.10	mg/kg	2.00		101	80-120			
Matrix Spike (6092608-MS1)		Source: T601317-17		Prepared: 09/26/06 Analyzed: 09/29/06						
Mercury	2.13	0.10	mg/kg	2.00	0.062	103	75-125			
Matrix Spike Dup (6092608-MSD1)		Source: T601317-17		Prepared: 09/26/06 Analyzed: 09/29/06						
Mercury	2.16	0.10	mg/kg	2.00	0.062	105	75-125	1.40	20	
Batch 6092609 - EPA 7471A Soil										
Blank (6092609-BLK1)				Prepared: 09/26/06 Analyzed: 10/03/06						
Mercury	ND	0.10	mg/kg							
LCS (6092609-BS1)				Prepared: 09/26/06 Analyzed: 10/03/06						
Mercury	2.39	0.10	mg/kg	2.00		120	80-120			
Matrix Spike (6092609-MS1)		Source: T601317-23		Prepared: 09/26/06 Analyzed: 10/03/06						
Mercury	2.30	0.10	mg/kg	2.00	0.059	112	75-125			
Matrix Spike Dup (6092609-MSD1)		Source: T601317-23		Prepared: 09/26/06 Analyzed: 10/03/06						
Mercury	2.12	0.10	mg/kg	2.00	0.059	103	75-125	8.14	20	
Batch 6092610 - EPA 7471A Soil										
Blank (6092610-BLK1)				Prepared: 09/26/06 Analyzed: 10/03/06						
Mercury	ND	0.10	mg/kg							

PSI - Long Beach	Project: KEN-1	
3960 Gilman Street	Project Number: 559-6G017	**Reported:**
Long Beach CA, 90815	Project Manager: Eric Fraske	10/03/06 16:02

Cold Vapor Extraction EPA 7470/7471 - Quality Control

SunStar Laboratories, Inc.

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Batch 6092610 - EPA 7471A Soil										
LCS (6092610-BS1)				Prepared: 09/26/06 Analyzed: 10/03/06						
Mercury	2.27	0.10	mg/kg	2.00		114	80-120			
Matrix Spike (6092610-MS1)		Source: T601317-50		Prepared: 09/26/06 Analyzed: 10/03/06						
Mercury	2.46	0.10	mg/kg	2.00	0.081	119	75-125			
Matrix Spike Dup (6092610-MSD1)		Source: T601317-50		Prepared: 09/26/06 Analyzed: 10/03/06						
Mercury	2.15	0.10	mg/kg	2.00	0.081	103	75-125	13.4	20	
Batch 6092611 - EPA 7471A Soil										
Blank (6092611-BLK1)				Prepared: 09/26/06 Analyzed: 10/03/06						
Mercury	ND	0.10	mg/kg							
LCS (6092611-BS1)				Prepared: 09/26/06 Analyzed: 10/03/06						
Mercury	2.36	0.10	mg/kg	2.00		118	80-120			
Matrix Spike (6092611-MS1)		Source: T601317-75		Prepared: 09/26/06 Analyzed: 10/03/06						
Mercury	2.29	0.10	mg/kg	2.00	0.080	110	75-125			
Matrix Spike Dup (6092611-MSD1)		Source: T601317-75		Prepared: 09/26/06 Analyzed: 10/03/06						
Mercury	2.38	0.10	mg/kg	2.00	0.080	115	75-125	3.85	20	
Batch 6092612 - EPA 7471A Soil										
Blank (6092612-BLK1)				Prepared: 09/26/06 Analyzed: 10/03/06						
Mercury	ND	0.10	mg/kg							

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PSI - Long Beach	Project: KEN-1	
3960 Gilman Street	Project Number: 559-6G017	**Reported:**
Long Beach CA, 90815	Project Manager: Eric Fraske	10/03/06 16:02

Cold Vapor Extraction EPA 7470/7471 - Quality Control

SunStar Laboratories, Inc.

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Batch 6092612 - EPA 7471A Soil										
LCS (6092612-BS1)				Prepared: 09/26/06 Analyzed: 10/03/06						
Mercury	2.01	0.10	mg/kg	2.00		100	80-120			
Matrix Spike (6092612-MS1)		Source: T601317-81		Prepared: 09/26/06 Analyzed: 10/03/06						
Mercury	1.84	0.10	mg/kg	2.00	0.22	81.0	75-125			
Matrix Spike Dup (6092612-MSD1)		Source: T601317-81		Prepared: 09/26/06 Analyzed: 10/03/06						
Mercury	1.95	0.10	mg/kg	2.00	0.22	86.5	75-125	5.80	20	

The results in this report apply to the samples analyzed in accordance with the chain o custody document. This analytical report must be reproduced in its entirety.

John J. Hyl

PSI - Long Beach	Project: KEN-1	
3960 Gilman Street	Project Number: 559-6G017	**Reported:**
Long Beach CA, 90815	Project Manager: Eric Fraske	10/03/06 16:02

Conventional Chemistry Parameters by APHA/EPA Methods - Quality Control

SunStar Laboratories, Inc.

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Batch 6092703 - General Preparation										
Duplicate (6092703-DUP1)	**Source: T601317-01**			Prepared: 09/27/06 Analyzed: 09/29/06						
pH	6.94		pH Units		6.8			2.04	20	
Batch 6092704 - General Preparation										
Duplicate (6092704-DUP1)	**Source: T601317-21**			Prepared: 09/27/06 Analyzed: 09/29/06						
pH	6.82		pH Units		7.3			6.80	20	
Batch 6092705 - General Preparation										
Duplicate (6092705-DUP1)	**Source: T601317-41**			Prepared: 09/27/06 Analyzed: 09/29/06						
pH	7.41		pH Units		7.4			0.135	20	
Batch 6092706 - General Preparation										
Duplicate (6092706-DUP1)	**Source: T601317-61**			Prepared: 09/27/06 Analyzed: 09/29/06						
pH	6.92		pH Units		7.0			1.15	20	
Batch 6092707 - General Preparation										
Duplicate (6092707-DUP1)	**Source: T601317-81**			Prepared: 09/27/06 Analyzed: 09/29/06						
pH	6.69		pH Units		6.7			0.149	20	

PSI - Long Beach	Project: KEN-1	
3960 Gilman Street	Project Number: 559-6G017	**Reported:**
Long Beach CA, 90815	Project Manager: Eric Fraske	10/03/06 16:02

Notes and Definitions

QM-03	Multiple analyses indicate the percent recovery exceeds the Quality Control acceptance criteria due to a matrix effect.
QB-01	The method blank contains analyte at a concentration above the MRL; however, concentration is less than 10% of the sample result, which is negligible according to method criteria.
DET	Analyte DETECTED
ND	Analyte NOT DETECTED at or above the reporting limit
NR	Not Reported
dry	Sample results reported on a dry weight basis
RPD	Relative Percent Difference

APPENDIX H

PHASE I/II ENVIRONMENTAL SITE ASSESSMENT, MAY 25, 2006

Advantage Environmental Consultants, LLC

Privileged and Confidential Attorney-Client Communication
PHASE I/II ENVIRONMENTAL SITE ASSESSMENT

South Central Farms
Los Angeles, California 90058

AEC Project No. 06-027SD
May 25, 2006

Prepared for:

The Trust For Public Land
116 New Montgomery, 3rd FL
San Francisco, CA 94105

Prepared by:

Advantage Environmental Consultants, LLC
810 Los Vallecitos Boulevard, Suite 210
San Marcos, California 92069
Phone (760) 744-3363 • FAX (760) 744-3383

ADVANTAGE
ENVIRONMENTAL
CONSULTANTS, LLC.

May 25, 2006

Aaron Friedland, Esq.
The Trust For Public Land
116 New Montgomery, 3rd Floor
San Francisco, California 94105

Subject: **Privileged and Confidential Attorney-Client Communication**
Phase I/II Environmental Site Assessment
South Central Farms Property
Los Angeles, CA 90058
AEC Project No. 06-027SD

Dear Mr. Friedland:

Advantage Environmental Consultants, LLC (AEC) has performed a Phase I/II Environmental Site Assessment (ESA) in conformance with the scope and limitations of ASTM Practice E 1527-00, of the above referenced property (i.e., "the Site"). This ESA included public environmental agency and historical record reviews, interviews, site observations, soil sampling/analysis and report preparation. This report includes AEC's findings, conclusions, recommendations, and supporting documentation.

We appreciate the opportunity to be of service to the Trust For Public Land. If you should have any questions regarding this report, or if we can be of further assistance, please contact Dan Weis at (760) 744-3363.

Sincerely,
ADVANTAGE ENVIRONMENTAL CONSULTANTS, LLC

Daniel Weis, REA I
Branch Manager
Western Regional Division

Michael R. Lewis, P.G.
Consulting Geologist

810 Los Vallecitos Blvd. Suite 210 San Marcos, CA 92069 Phone: 760-744-3363 Fax: 760-744-3383 Email: dweis@aec-env.com

TABLE OF CONTENTS

1.0 EXECUTIVE SUMMARY 1

1.1 SUMMARY AND FINDINGS 1
1.2 CONCLUSIONS AND RECOMMENDATIONS 3

PHASE I ENVIRONMENTAL SITE ASSESSMENT

2.0 INTRODUCTION 4

2.1 PURPOSE 4
2.2 SCOPE OF SERVICES 4
2.3 LIMITATIONS AND EXCEPTIONS 5
2.4 USER RELIANCE 6

3.0 SITE DESCRIPTION 7

3.1 LOCATION AND LEGAL DESCRIPTION 7
3.2 CURRENT USE OF THE SITE 7
3.3 DESCRIPTION OF IMPROVEMENTS 7
3.4 CURRENT USES OF ADJOINING PROPERTIES 7

4.0 USER PROVIDED INFORMATION 9

4.1 REASON FOR PERFORMING PHASE I ESA 9
4.2 SPECIALIZED KNOWLEDGE 9
4.3 VALUATION REDUCTION FOR ENVIRONMENTAL ISSUES 9
4.4 TITLE RECORDS 9
4.5 ENVIRONMENTAL LIENS OR ACTIVITY AND USE LIMITATIONS 9
4.6 OWNER, PROPERTY MANAGER, AND OCCUPANT INFORMATION 9

5.0 RECORDS REVIEW 10

5.1 FEDERAL DATABASE REVIEWS 10
5.2 STATE DATABASE REVIEWS 12
5.3 Local Regulatory Agency Research 14
5.3.1 County/Local Health Department 14
5.3.2 City of Los Angeles Fire Department 14
5.4 PHYSICAL SETTING SOURCES 15
5.4.1 Topography and Hydrology 15
5.4.2 Geology 16
5.4.3 Hydrogeology 16
5.5 HISTORICAL USE INFORMATION 16
5.5.1 Previous Environmental Reports 16
5.5.2 Fire Insurance Maps 20
5.5.3 City Directories 22
5.5.4 State of California Division of Oil and Gas Records 23
5.5.5 Interview Information 23

6.0 SITE RECONNAISSANCE 24

6.1 METHODOLOGY AND LIMITING CONDITIONS 24
6.2 CHEMICAL STORAGE 24
6.3 WASTE GENERATION, STORAGE AND DISPOSAL 24
6.4 STORAGE TANKS 24

6.5 Polychlorinated Biphenyls (PCBs) 24
6.6 Other Conditions of Potential Concern 25

7.0 FINDINGS, CONCLUSIONS AND RECOMMENDATIONS OF THE PHASE I ESA 26

PHASE II ENVIRONMENTAL SITE ASSESSMENT

8.0 FIELD ACTIVITIES AND METHODOLOGY 27

8.1 Pre-Field Activities 27
8.2 Soil Sampling 27
8.3 Laboratory Analysis 28

9.0 RESULTS AND DISCUSSION 29

9.1 Subsurface Conditions 29
9.2 Analytical Laboratory Data 29

10.0 CONCLUSIONS OF THE PHASE II ESA 31

11.0 RECOMMENDATIONS AND LIMITATIONS OF THE PHASE II ESA 32

12.0 REFERENCES 33

APPENDICES

Appendix A – Vicinity Map
Appendix B – Site Plan
Appendix C – EDR Regulatory Database Report
Appendix D – City of Los Angeles Fire Department Records
Appendix E – Fire Insurance Maps
Appendix F – City Directories
Appendix G – Site Photographs
Appendix H – Tables of Analytical Data
Appendix I – Analytical Laboratory Report and Chain-of-Custody Documentation

1.0 Executive Summary

1.1 Summary and Findings

At the request of the Trust For Public Land, Advantage Environmental Consultants, LLC (AEC) conducted a Phase I/II Environmental Site Assessment (ESA), in conformance with the scope and limitations of ASTM Practice E 1527-00 (Phase I portion), of the South Central Farms property, located in the City of Los Angeles, California (hereinafter referred to as the "Site"). The Site is a 9.4-acre portion of the South Central Farms urban farm, bounded to the north by East Martin Luther King Boulevard, to the south by East 41st Street, to the east by South Alameda Street and to the west by Long Beach Avenue. East 40th Place traverses the central portion of the Site in an east-west direction. The Site is a portion of an urban farm utilized by local farmers and no habitable structures are present on the Site. No concerns with respect to hazardous waste/materials, storage tanks or other potential environmental conditions were noted during a site reconnaissance completed during the preparation of this assessment.

Portions of the Site have sustained decades (from at least the 1920s to early 1990s) of light-industrial use as indicated in historical fire insurance maps and city directories (refer to Sections 5.5.2 and 5.5.3). Numerous environmental investigations (refer to Section 5.1.1) have been conducted on the South Central Farms property from 1993 to 2003 and primarily targeted potential soil contamination in areas of former light-industrial activity and suspect underground storage tank (UST) areas. According to some of the prior environmental studies, areas of near-surface soil throughout much of the project Site are impacted with petroleum hydrocarbons (diesel fuel and oil) and heavy metals (particularly lead). However, the levels typically would not represent an imminent threat to the environment or persons working on the farm. Other contaminants found during prior studies included organochlorine pesticides and various volatile organic compounds (VOCs) and semi-volatile organic compounds (SVOCs). The levels of these compounds reported in the documents reviewed by AEC are considered to be low and were below applicable regulatory action levels. USTs were not found on the Site during the prior environmental studies but are present on some adjacent properties. Portions of the South Central Farms property within the subject Site boundaries that were referenced as remaining unassessed after completion of the prior assessments included a metal cast and pattern shop/foundry in the southwestern corner of the Site and a gasoline station at 4050 Long Beach Avenue (former address) located at the southeast corner of Long Beach Avenue and East 40th Place.

AEC reviewed Federal and State environmental databases provided by Environmental Data Resources (EDR) for information pertaining to documented and/or suspected releases of regulated hazardous substances and/or petroleum products within specified search distances. The Site was listed on a few of the regulatory databases. The listings generally did not indicate significant environmental concerns. A drycleaning facility was mapped at 1835 East 41st Street (southeast portion of the subject Site). Although this address is not one of the current Site addresses, it does fall within the range of potential

former addresses of the subject property. No violations are reported for this facility. If this portion of the Site was historically used as a drycleaner, adverse environmental conditions could be present in the subsurface in this area. Adjacent and nearby properties listed on various regulatory database are not considered a concern to the Site.

To address concerns pertaining to potential soil contamination at the Site, twelve soil borings were drilled at the Site under AEC oversight using direct push sampling equipment. Two of the borings were drilled to 20 feet below the ground surface at the former gasoline station area. The remaining 10 soil borings were drilled to three feet below existing grades at locations throughout the Site in a general grid pattern and served as a confirmatory assessment of near surface soils (compared to prior studies) and a screening level assessment of current soil conditions throughout the property. Four of the ten borings were drilled in areas to the north of East 40th Place and the remaining six borings were drilled in the southern portion of the site (south of East 40th Place). Two of the borings drilled in the southern portion of the Site also targeted the areas of concern of the former foundry and potential former drycleaner. Soil samples were collected at depths of 0.5 foot and 1.5, 3, 5, 10, 15 and 20 feet below grade in the two soil borings drilled at the former gasoline station. Soil samples were collected at depths of 0.5 foot, 1.5 feet and 3 feet below existing grades in the remaining soil borings. Initially, the analytical laboratories were instructed to composite every four 0.5-foot samples for petroleum hydrocarbons, metals and VOC analysis (total of three composite soil samples). In addition, select soil samples from greater depths at the former gasoline station were analyzed for petroleum hydrocarbons and VOCs. Remaining portions of the 0.5-foot deep samples and the additional soil samples obtained from the site were held at the analytical laboratories pending initial analysis.

Soil samples analyzed for petroleum hydrocarbons and VOCs did not exhibit levels at or above laboratory detection limits. A number of metals were detected in the soil samples collected as part of this investigation. The composite soil sample metal concentrations were compared to applicable risk-based regulatory criteria. Discrete surficial soil samples were also analyzed for arsenic, cadmium and lead based on the results of the composite testing effort. Additional discrete analysis of other metals was not warranted. Some of the levels of cadmium and lead exceeded conservative regulatory criteria for residential land uses but not for commercial or industrial scenarios. A level of arsenic reported at 90.3 milligrams per kilogram (mg/kg) in the 0.5-foot soil sample of soil boring B6 (northern portion of the Site located south of East 40th Place) represents a significant finding of this assessment. This concentration is considered elevated above typical background (even for an urban environment). Other arsenic levels found in the soil samples were within typical background ranges of arsenic for California soil. In general, the levels of metal described herein are not ones that would represent an imminent threat to the environment or persons working on the farm.

1.2 Conclusions and Recommendations

Based on the results of the soil sampling and analysis completed by AEC during the preparation of this assessment, additional assessment for petroleum hydrocarbons, VOCs and metals (excluding arsenic) does not appear to be warranted at this time. If TPL (or the future landowner) desires to take a conservative approach toward the level of arsenic found in soil boring B6 (90.3 mg/kg), soil in the vicinity of this boring can be excavated and disposed of at an offsite landfill or recycling facility. Confirmation soil sampling and analysis will be required to ensure that the soil with the elevated arsenic levels is removed. In addition, no soil should be exported from the Site without evaluation of metals levels with respect to applicable waste characterization criteria. It is our understanding that export of soil from the Site is not planned at this time.

Phase I Environmental Site Assessment

2.0 Introduction

2.1 Purpose

The purpose of this Phase I ESA is to provide a professional opinion on the presence of recognized environmental conditions and other potential environmental conditions in connection with the Site, as they existed on the date of the site inspection, and to recommend whether further investigation is required. The American Society for Testing and Materials (ASTM) Standard Practice E 1527-00, Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process, defines good commercial and customary practice for conducting an environmental site assessment of a parcel of commercial real estate with respect to the range of contaminants pertinent to the scope of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), as well as petroleum products. As such, this ESA is intended to satisfy one of the requirements that permit the user to qualify for the innocent landowner defense to CERCLA liability. In other words, this ESA represents one of the practices that constitute "all appropriate inquiry into the previous ownership and uses of the property consistent with good commercial or customary practice" as defined in 42 USC Section 9601(35)(B).

The goal of the process is to identify recognized environmental conditions, which are defined by the Practice as "the presence or likely presence of any hazardous substances or petroleum products on a property under conditions that indicate an existing release, a past release, or a material threat of release of any hazardous substances or petroleum products into the structures on the property or into the ground, groundwater or surface water of the property". The term *recognized environmental condition* includes hazardous substances or petroleum products even under conditions in compliance with laws. The term is not intended to include de minimis conditions that generally do not present a material risk of harm to public health or the environment and that generally would not be the subject of an enforcement action if brought to the attention of appropriate governmental agencies.

2.2 Scope of Services

This assessment was conducted in accordance with generally accepted Phase I industry standards using ASTM Standard Practice E 1527-00 and AEC Proposal Number 05-027SD. The following services were provided for this assessment:

- An evaluation of information contained within Federal and State environmental databases, and other local environmental records, within specific search distances.
- An evaluation of past Site uses through a review of reasonably obtainable standard historical sources such as historical maps, aerial photographs and interviews with knowledgeable persons.

- A qualitative evaluation of the physical characteristics of the Site through a review of published topographic, geologic, and hydrogeologic maps; published groundwater data; and area observations to characterize surface water flow in the Site area.

- An evaluation of current Site conditions including, but not limited to, a search for the following items including: storage tanks (above or below ground); potential polychlorinated biphenyl (PCB)-containing electrical equipment; hazardous materials and petroleum products generation; treatment, storage, or disposal of hazardous, regulated, or medical wastes.

- The preparation of a Phase I ESA report, which represents the findings from the studies of the items described above and provides conclusions and recommendations based on the information gathered above and provided by the Trust For Public Land.

2.3 Limitations and Exceptions

This Phase I ESA was conducted in accordance with ASTM guidelines for the performance of Phase I Environmental Site Assessments. No other warranties either express or implied, are made by AEC. AEC's evaluations, analyses, and opinions should not be taken as representations regarding subsurface conditions or the actual value of the Site. Subsurface conditions may differ from the conditions implied by the surficial observations, and can only be reliably evaluated through intrusive techniques.

Documentation and data provided by the Trust For Public Land, designated representatives of the Trust For Public Land, or other interested third parties, or from the public domain, and referred to in the preparation of this assessment, are assumed to be complete and correct and have been used and referenced with the understanding that AEC assumes no responsibility or liability for their accuracy. AEC's conclusions are based upon such information and documentation and on our observations of Site conditions, as they existed on the date of the site inspection. Because Site conditions may change significantly over a short period of time and additional data may become available, data reported and conclusions drawn in this report are limited to current conditions and may not be relied upon on a significantly later date.

Reasonable efforts have been made during this assessment to uncover evidence of USTs, aboveground storage tanks (ASTs), and ancillary equipment associated with these tanks. "Reasonable efforts" are limited to information gained from visual observation of unobstructed areas, recorded database information held in public record, and available information gathered from interviews. Such methods may not identify subsurface equipment that may have been hidden from view due to paving, construction or debris pile storage, or incorrect information from sources.

This investigation was not an environmental compliance audit. While some observations and discussion in this report may address conditions and/or operations that may be

regulated, the regulatory compliance of those conditions and/or operations is outside the scope of this investigation.

Nothing in this report constitutes a legal opinion or legal advice. For information regarding specific individual or organizational liability, AEC recommends consultation with independent legal counsel.

2.4 User Reliance

This report was prepared for use solely and exclusively by the Trust For Public Land, the Los Angeles Neighborhood Land Trust and other parties (as identified by the Trust For Public Land). This Phase I ESA may be provided by the Trust For Public Land, in its sole discretion, to third parties in connection with the sale of the land or portions thereof by the Trust For Public Land to said third parties or acquisition of the land by the Trust For Public Land from said third party, and may be relied upon by such third party to the same extent that this report may be relied upon by the Trust For Public Land. No other use or disclosure is intended or authorized by AEC. In the preparation of this ESA, AEC has used the degree of care and skill ordinarily exercised by a reasonably prudent environmental professional in the same community and in the same time frame given the same or similar facts and circumstances. No other warranties are made to any third party, either express or implied.

3.0 Site Description

3.1 Location and Legal Description

The Site is a 9.4-acre portion of the South Central Farms urban farm, bounded to the north by East Martin Luther King Boulevard, to the south by East 41st Street, to the east by South Alameda Street and to the west by Long Beach Avenue. East 40th Place traverses the central portion of the Site in an east-west direction. A vicinity map is included as Appendix A.

Current physical addresses and associated Los Angeles County Assessors Identification Numbers (AINs) include a portion of 1838 East Martin Luther King Boulevard (AIN 5117-019-016), 1720 East 40th Place (AIN 5117-020-029), a portion of 1721 East 40th Place (AIN 5117-019-019), 1883 East 40th Place (AIN 5117-019-020), 1701-1801 East 41st Street (AINs 5117-020-029 through -040), 4051 South Alameda Street (AIN 5117-021-020) and 4073 South Alameda Street (AIN 5117-021-023). In addition, there are two parcels within the Site (AINs 5117-021-021 and -022) that have no physical addresses.

3.2 Current Use of the Site

The Site is a portion of an urban farm utilized by local farmers.

3.3 Description of Improvements

No habitable structures are present on the Site. Chain-linked fencing surrounds the majority of the property boundaries. There are some storage sheds located within several of the garden plots used for storage of various supplies, tools and materials. East 40th Place (paved road) traverses the central portion of the Site in an east/west direction. Access gates to the Site are present at its east and west ends within East 40th Place. Municipal utilities including sewer and water are present beneath this road. Storm drain inlets are present along the edges of East 40th Place adjacent to concrete curbs. There are two sinks (produce washing stations) located along the edge of the road as well. Meandering dirt paths traverse the property in varying directions providing access to the farm plots. A Site Plan is included as Appendix B.

3.4 Current Uses of Adjoining Properties

The area surrounding the Site consists primarily of residential and commercial land uses. The following table identifies the adjacent property uses:

Direction	Adjoining Property Use
North	East Martin Luther King Boulevard, then commercial and office buildings – 1700 and 1800 (odd street addresses) of East Martin Luther King Boulevard

Direction	Adjoining Property Use
South	East 41st Street, then commercial and office buildings - 1700 and 1800 (even street addresses) of East 41st Street
East	South Alameda Street, then commercial buildings – 3700 to 4000 block (even street addresses) of South Alameda Street
West	Long Beach Avenue, then railroad tracks and commercial/residential buildings – 4000 block (odd street addresses) of Long Beach Avenue

4.0 User Provided Information

4.1 Reason for Performing Phase I ESA

The Trust For Public Land retained AEC to conduct this Phase I ESA in connection with the potential purchase of the Site, to identify any environmental issues which may be present. We understand that if acquired, the property will be conveyed to the Los Angeles Neighborhood Land Trust for preservation of its existing urban farm use.

4.2 Specialized Knowledge

AEC was provided with prior environmental studies pertaining to the Site (refer to Section 5.5.1). Aside from information included in the reports, AEC was not informed of any specialized knowledge pertinent to potential environmental conditions at the Site.

4.3 Valuation Reduction for Environmental Issues

AEC was not informed of any environmental issues that have caused or may cause a valuation reduction of the Site.

4.4 Title Records

AEC was not provided with title records for the Site. However, a full legal description was provided by TPL as well as the names of the current property owners. The lack of a review of title records does not alter the conclusions and recommendations of this assessment. According to the information provided, the subject Site is currently owned by Horowitz Trust (42.5% interest), Libaw L.P.(42.5% interest), Ison (10% interest) and Shaghan Securities (5% interest).

4.5 Environmental Liens or Activity and Use Limitations

AEC was not notified of any environmental liens or activity or use limitations that are related to environmental issues that may cause a valuation reduction of the Site.

4.6 Owner, Property Manager, and Occupant Information

Mr. Tezo Zomac, a leasee of one of the farm plots at the property and one of the spokesmen for the project was interviewed by AEC during the preparation of this ESA. Information obtained during the interview is included in pertinent sections of this report.

5.0 Records Review

AEC reviewed Federal and State environmental databases provided by EDR, for information pertaining to documented and/or suspected releases of regulated hazardous substances and/or petroleum products within specified search distances.

AEC also reviewed the unmappable sites listed in the environmental database report by cross-referencing addresses and site names. Unmappable ("non geocoded") sites are sites that cannot be plotted with confidence, but can be located by zip code or city name. In general, a site cannot be mapped because of inaccurate or missing location information in the record provided by the regulatory agency. Any unmappable sites that AEC identified within the specified search radii are included and discussed in the corresponding database sections. A copy of the EDR report is included as Appendix C.

5.1 Federal Database Reviews

National Priorities List (NPL)

The National Priorities List (Superfund) is the United States Environmental Protection Agency (EPA) database of uncontrolled or abandoned hazardous waste sites identified for priority remedial actions under the Superfund Program.

- Neither the Site nor properties mapped within a 1-mile radius of the Site are listed on the Federal NPL.

Comprehensive Environmental Response, Compensation and Liability Information System (CERCLIS)

The CERCLIS List is a compilation of known and suspected uncontrolled or abandoned hazardous waste sites which are, or were, under investigation by the EPA but have not been elevated to the status of a Superfund (NPL) site.

- The Site is not listed on the CERCLIS database.

- One property mapped within a one-half mile radius of the Site is listed on the CERCLIS database. The property is identified as AAD Disposal and reportedly located approximately 2,000 feet to the east of the Site at 2306 38th Street in Vernon, California. Based on the information pertaining to this property in the database and distance of this property from the Site, the AAD Disposal facility is not considered a concern to the subject Site.

CERCLIS No Further Remedial Action Planned (NFRAP)

The CERCLIS-NFRAP List is a database of archived CERCLIS sites that to the best of EPA's knowledge, assessment has been completed and has determined no further steps will be taken to list them on the NPL.

- The Site is not listed on the CERCLIS-NFRAP database.

- One property mapped within a one-half mile radius of the Site is listed on the CERCLIS-NFRAP database. The property is identified as Renu Plating Corp and reportedly located approximately 1,800 feet to the northwest of the Site at 1531 East 32nd Street in Vernon, California. Based on the regulatory status of this facility and distance of this property from the Site, the Renu Plating Corp facility is not considered a concern to the subject Site.

RCRA Treatment, Storage, and Disposal (TSD) Facilities

The Resource Conservation and Recovery Act (RCRA)-TSD database is a compilation by the USEPA of reporting facilities that transport, treat, store, or dispose of hazardous waste.

- Neither the Site nor any properties within one-half mile of the Site were listed on the RCRA TSD database.

RCRA CORRACTS

The RCRA CORRACTS database identifies TSD facilities that have conducted, or are currently conducting, corrective actions as regulated under RCRA.

- Neither the Site nor any properties within one-half mile of the Site were listed on the RCRA-CORRACTS database.

RCRA Generators

The RCRA Generator database tracks large quantity generators (LQG) and small quantity generators (SQG) of hazardous waste.

- One of the current physical addresses of the Site is listed on the RCRA Generator database as a SQG. The address listed is 4073 South Alameda Street and the referenced business is Utility Trailers. No violations are reported for this facility.

- A former address of the Site is also listed as a SQG. The address listed is 1838 East Santa Barbara Avenue (now Martin Luther King Boulevard) and the referenced business is Singer Co. LA Period Furniture Division. No violations are reported for this facility.

- Walter Miller Express Cleaner (referenced as a drycleaning facility), is mapped at 1835 East 41st Street (southeast portion of the subject Site) and is listed on the database as a SQG. Although this address is not one of the current Site addresses, it does fall within the range of potential former addresses of the subject property. No violations are reported for this facility. If this portion of the Site was historically used as a drycleaner, adverse environmental conditions could be present in the subsurface in this area.

- Eleven small quantity RCRA Generators (some adjacent across bordering roadways) were identified within one-quarter mile of the Site. The properties are listed with no reported violations or enforcement actions. Based on the lack of reported violations and location of the SWG properties, it is not anticipated that the Site has been adversely impacted by these properties.

Emergency Response Notification System (ERNS) Database

The ERNS is a national database used to collect information on reported releases of oil or hazardous substances. The ERNS database is now part of the National Response Center (NRC) database.

- The Site is not listed on the ERNS database.

5.2 State Database Reviews

Cal-Sites

The State Sites database is a compilation of information and sub-databases maintained by the California EPA, Department of Toxic Substances Control (DTSC). Such information includes lists of properties that are known to be contaminated with hazardous substances as well as information regarding properties that are uncharacterized where further studies may reveal problems.

- The Site was not listed on the Cal-Sites database.

- There are three properties mapped within a 1-mile radius of the Site that are listed on the Cal-Sites database. The properties include Renu Plating at 1531 East 32nd Street and AAD Disposal at 2306 38th Street (both referenced previously) which as stated previously are not considered a concern to the subject Site. Amtrak, reportedly located 4,500 feet northeast of the Site at 2435 East Washington Boulevard, is listed on the Cal-Sites database as an active case listing. Based on the information pertaining to this property in the database and distance of this property from the Site, the Amtrack facility is not considered a concern to the subject Site.

State Landfills

SWL facilities within the State of California are regulated by the California Integrated Waste Management Board (CIWMB). The lists provided by the CIWMB and searched include Solid Waste Transfer Stations, Inactive Solid Waste Facilities, and the Solid Waste Facilities Database.

- The Site is not listed on the State Landfills database.

- One property mapped within a one-quarter mile radius of the Site is listed on the State Landfills database. The property is identified as Azteca Rubbish and reportedly located approximately 1,150 feet to the south of the Site at 1742 East 43rd Street. Wastes reportedly accepted at this facility include construction/demolition debris and other inert materials. Based on the regulatory status of this facility and distance of this property from the Site, the Azteca Rubbish facility is not considered a concern to the subject Site.

Underground Storage Tank Database (UST)

EDR searches several UST databases that are a combination of information sources maintained by the Cal EPA and Federal EPA, with the primary sources being from State and local agencies. Properties on the list house either ASTs or USTs.

- One of the current physical addresses of the Site is listed on the UST databases. The address listed is 1801 East 41st Street and the referenced business is Utility Trailer Co Corp. According to the database, there are no tanks currently present at this address. Refer to Section 5.3.2 of this report for additional information pertaining to USTs at this property.

- A former physical address of the Site (1786 East Martin Luther King Boulevard) is also listed on the UST databases. No details are provided in the database report. Refer to Section 5.3.2 of this report for additional information pertaining to USTs associated with this address.

- There are 20 properties mapped within a ¼-mile radius of the Site that are listed on one or more of the UST databases. Only one of these properties is listed on the leaking underground storage tank (LUST) database. The listed property is located approximately 750 feet east-northeast of the subject Site. Based on the information provided in the database report, none of the properties listed on the UST databases are expected to adversely impact the subject Site.

Leaking Underground Storage Tanks (LUST)

The LUST database is maintained by the California Regional Water Quality Control Board (RWQCB) and lists properties with known releases from USTs.

- The Site is not listed on the LUST database.
- As stated previously, one property mapped within a ¼-mile radius of the Site is listed on the LUST database. The property is identified as Crescent Truck Lines and reportedly located approximately 750 feet east-northeast of the Site at 2910 Ross Street, Vernon, California. The case type is listed as "soil only" with a closed regulatory status. This property is not considered a concern to the subject Site.
- There are three properties mapped between ¼ to ½-mile from the Site that are listed on the LUST database. Cases for these properties are listed as "soil only" with closed regulatory status. These properties are not considered a concern to the subject Site.

Additional Non-ASTM State Databases

Additional properties in the site vicinity are listed on other non-ASTM State databases as specified in the EDR report. None of these additional properties are expect to adversely impact the Site.

5.3 Local Regulatory Agency Research

The following local regulatory agency review was conducted/reviewed to obtain any environmentally significant information concerning the Site that was readily available.

5.3.1 County/Local Health Department

The County of Los Angeles Site Mitigation List and HMS (industrial waste and UST sites) databases were searched in the regulatory database report provided by EDR. The Site is not listed in either of these databases.

5.3.2 City of Los Angeles Fire Department

A public records request was submitted to the City of Los Angeles Fire Department (LAFD) UST Division for information pertaining to USTs on the Site. Current and/or historical addresses of the Site searched by LAFD included 4050 Long Beach Avenue (former gas station), 1720, 1721, 1733 and East 40th Place, 1707, 1769, 1801 and 1835 East 41st Street, 4051 and 4073 South Alameda Street and 1786 and 1838 East Martin Luther King Boulevard (formerly East Santa Barbara Avenue). Records were found for 1801 East 41st Street and 1786 East Martin Luther King Boulevard. No records were found for the remaining addresses searched.

A LAFD permit dated August 28, 1973 was issued to Utility Trailer Sales Co. (addressed referenced as 1801 East 41st Street) for the installation of two atmospheric tanks built as per plans and specifications. However, the application for the permit which includes written information and a drawing of the property and tank locations indicates that the actual location of the installed tanks and dispensers was at 1801 East 41st Place, located one block south of the subject Site. Based on this information, it is likely that there was a typographical error pertaining to the street address of the permitted location on the LAFD permit and that the USTs were not installed on the subject Site.

Information included in the file for 1786 East Martin Luther King Boulevard indicated that a 6,000-gallon UST used for diesel fuel storage was removed from the sidewalk area adjacent to the subject Site and west of the intersection of East Martin Luther King Boulevard and South Alameda Street. The tank was removed from this area (for subsequent recycling) on March 7, 1996 by Petro Builders, Inc. under regulatory oversight by Hart Crowser and the LAFD. Stockpiles of soil generated during the excavation were placed in the northern portion of the subject Site. Two confirmation soil samples were obtained from the excavation bottom and two samples were obtained from the stockpile areas and analyzed at an off-site analytical laboratory for total petroleum hydrocarbons (TPH) in the diesel range and benzene, toluene, ethylbenzene and total xylenes (BTEX). Such analytes were not detected at or above laboratory detection limits in the four soil samples. The LAFD recommended no further action with respect to the UST and the excavation was backfilled. It is likely, but not verified that the spoil piles generated during the tank excavation were used as fill material for the backfilling process.

LAFD file Information pertaining to these properties is included in Appendix D.

5.4 Physical Setting Sources

The following physical setting sources were reviewed to provide information about the topographic, hydrologic, geologic and/or hydrogeologic characteristics of the Site.

5.4.1 Topography and Hydrology

USGS Topographic Quadrangle

Based on a review of the United States Geological Survey (USGS) 7.5 Minute Series, Los Angeles, CA Topographic Quadrangle map dated 1994, the elevation of the Site is approximately 210 feet above mean sea level (msl). The site is located in Section 28, Township 1 North, Range 8 West. Slope and surface drainage patterns in the direct vicinity of the Site are to the southeast and southwest.

Hydrology/Storm Water Management

Surface drainage at the Site is facilitated by a municipal storm drain that traverses the Site in an east-west direction within 40th Place. Storm drain inlets are present along the curb areas of this street.

5.4.2 Geology

The Site lies within the Peninsular Ranges Geologic Province of California. This geomorphic province is traversed by a group of northwest trending sub-parallel fault zones and encompasses an area that extends 125 miles from the Transverse Ranges and the Los Angeles Basin south to the Mexican Border and beyond another 775 miles to the tip of Baja California. Rocks within the Peninsular Range Province were emplaced during Cretaceous age orogenic events and uplifted into the present mountain ranges during the late Tertiary and Quaternary. Igneous, metamorphic and sedimentary rocks are all found within the Peninsular Ranges. The area is seismically active, with several known active faults crossing the Province.

Based on geologic map sources, the Site appears to be underlain by Holocene-age alluvial fan deposits consisting of loose to medium dense sand, silt and gravel. No faults are mapped on the Site and the property is not located within an Alquist-Priolo Fault Zone.

5.4.3 Hydrogeology

According to the Water Quality Control Plan for the Los Angeles Basin (1994), groundwater within the Los Angeles Coastal Plain (in which the Site is located) has existing beneficial uses for municipal, agricultural and industrial service/process. Based on regional groundwater information for the area, historical high levels of groundwater beneath the Site are estimated at 75 to 80 feet below the ground surface with anticipated regional flow direction to the southeast and/or southwest. Groundwater depth beneath the site likely varies due to local faulting, seasonal rainfall and other factors.

5.5 Historical Use Information

AEC reviewed the following historical sources to develop a history of the previous uses of the Site and surrounding area, in order to help identify the likelihood of past uses having led to recognized environmental conditions in connection with the Site.

5.5.1 Previous Environmental Reports

Prior environmental investigations have been completed at the South Central Farms property. AEC recently completed a review of excerpts of the following documents that were provided by the client:

- Preliminary Site Assessment, Lancer Site, Los Angeles, California, dated April 1993 and prepared by Montgomery Watson on behalf of the Los Angeles City Harbor Department.

- Preliminary Health Risk Evaluation, Lancer Site, dated January 18, 1995 and prepared by Hart Crowser, Inc. on behalf of the Port of Los Angeles (analytical data tables and soil boring location map only).

- Draft Site Investigation Report, Lancer Site, dated October 29, 2003 and prepared by Pacific Edge Engineering, Inc. on behalf of the Port of Los Angeles

It is AEC's understanding that other reports have been prepared on behalf of the Port of Los Angeles or the City of Los Angeles and include but are not limited to the following:

- An Environmental Impact Report (EIR) dated February 1984 and prepared by Cooper Engineers, Inc.
- Lancer Site demolition reports, dated May 25, November 14 and November 15, 1990 and prepared by the City of Los Angeles Geotechnical Services Section
- A Health Risk Assessment of the L.A. City Energy Recovery (Lancer) Project, dated April 17, 1987, author not specified
- Asbestos Air Monitoring Report, dated January 4, 1990 and prepared by CTC Environmental Services
- An asbestos survey report dated May 21, 1990 and prepared by CTC Environmental Services
- Preliminary Health Risk Evaluation of Gardening Uses, Lancer Site, dated September 16, 1994 and prepared by Hart Crowser, Inc.
- Underground Storage Tank Closure Report, Port of Los Angeles, Lancer Site, 1786 East Martin Luther King Boulevard, dated June 1996 and prepared by Hart Crowser, Inc.

Such documents were not provided or reviewed by AEC during this assessment. However, a summary of some of these reports was included in the April 1993 Montgomery Watson report.

According to the Montgomery Watson report summary, surficial discoloration of soil was noted in some areas of the Site during demolition of the former structures once present on the property. Elevated levels of TPH and polynuclear aromatic hydrocarbons (PAHs) were found in select surficial soil samples. Four soil borings were drilled in locations identified as Areas 1 and 2 and indicated petroleum hydrocarbon contamination in the upper 1 foot of the soil column with minor levels of VOCs and SVOCs noted. Two concrete clarifiers (identified as Areas 3 and 4) and a concrete-lined pit were also identified at the Site. Areas 1, 2 and 4 were reportedly located on the southern half of the farm (south of East 40th Place) while Area 3 was located near the southern boundary of the northern half of the farm.

Approximately 225 cubic yards of soil was reported excavated, manifested and removed from the Site by a licensed hauler. Confirmation soil samples were obtained from the bottoms of the excavations and tested for petroleum hydrocarbons and SVOCs. The results did not indicate analytes above laboratory detection limits. The referenced

clarifiers and concrete-lined pit were also removed from the Site. Soil testing in Area 3 (clarifier 1) was conducted and did not exhibit contaminant levels of concern. Analytes included TPH, BTEX and metals. Elevated levels of lead and BTEX were found in Area 4 (clarifier 2). Additional soil remediation was apparently conducted in these areas as indicated by a report of compaction test results of fill material used to replace excavated and remediated soils. Additional details pertaining to the nature and extent of the remediation was not included in the report. Based on Montgomery Watson's review of the prior documents, they concluded the following:

- The horizontal extent of contamination subsequent to remediation did not appear to have been well defined
- Only four relatively small areas were remediated over the entire 13.3-acre property
- The basis for identification of contaminated areas was primarily visual observation of discolored soils
- Precise areas of sampling and soil boring were unclear
- The majority of the property had not been investigated with regards to locations of previous tenants/structures.

Montgomery Watson conducted a subsequent preliminary site assessment (similar scope to a Phase I ESA). The assessment included a site reconnaissance, historical aerial photograph and fire insurance map review and government records/database review. It was concluded in the report that several areas on the property with soil contamination were identified by the City of Los Angeles Geotechnical Services and remediated by the City. It was stated that the extent of remediation appears adequate but the level and quality of reliable documentation is low. A risk management matrix was included in the report identifying other potential areas of concern on the property due to historical land uses (primarily identified during fire insurance map review). Additional soil sampling and analysis was recommended throughout the property. In addition, two potential UST areas were identified and included the former Utility Trailer Sales Company property (referenced as 1828 East 41st Street) and along Martin Luther King Boulevard (curb area) along the northern property boundary (1786 East Martin Luther King Boulevard). Evaluation for the potential presence of tanks at these locations was also recommended. It should be noted that 1828 East 41st Street is located on the opposite side of 41st Street (not on the subject Site). This is considered a potential error by Montgomery Watson in the completion of their assessment.

The September 16, 1994 Hart Crowser Preliminary Health Risk Evaluation report (as discussed in the Montgomery Watson report) indicated the chemicals detected in soils at the property included metals and SVOCs with lead being the primary concern for potential health impacts. It was also stated that lead levels over most of the property are acceptable for gardening with a limited number of samples exceeding acceptable limits. Additional sampling for contaminants of concern was recommended.

Based on our review of limited information from the 1995 Preliminary Health Risk Evaluation completed by Hart Crowser, Inc., a total of 44 sampling points (soil boring locations) were identified in this study. Some of the sampling locations were located in potential areas of concern including the former die casting area, a former truck repair area

and a former painting area and varnish room. Other samples were aligned in a grid pattern throughout the property. Soil samples were obtained from depths ranging from 0.5 foot to 5 feet below the ground surface and were tested for analytes such as total metals, SVOCs, TPH, total recoverable petroleum hydrocarbons (TRPH) and VOCs. SVOCs, TPH and VOCs were not detected at or above laboratory detection limits analyzed for such constituents. Levels of TRPH detected ranged from 18 milligrams per kilogram (mg/kg) to 195 mg/kg. Lead levels ranged from less than the laboratory detection limit up to a maximum of 523 mg/kg. A geophysical survey was completed at the former Utility Trailer Sales Company property and no indicators of USTs were reported.

During the completion of the October 29, 2003 Draft Site Investigation Report prepared by Pacific Edge Engineering, a total of 24 direct-push soil borings and 32 hand auger borings were drilled at the South Central Farms property. Diagrams of the boring locations were not provided in AEC's copy of excerpts of this report. Soil samples were collected at depths ranging from 0.5 foot to 15 feet below the ground surface. Select soil samples were analyzed for TPH, SVOCs, VOCs, total metals, hexavalent chromium, organochlorine pesticides, PCBs and chlorinated herbicides. Levels of TPH (diesel and heavy oil ranges) were found in surficial soil at levels as high as 550 mg/kg and were not deemed a significant risk. Low level SVOCs, VOCs and PCBs were found in some of the soil samples and compared to United States EPA Preliminary Remediation Goals (PRGs) for commercial/industrial properties. None of the levels of the referenced analytes detected exceeded their respective PRGs.

Levels of metals (excluding arsenic) also did not exceed the PRGs for commercial/industrial soil. However, it was noted that some soil at the property would be considered a hazardous waste (based on a comparison to waste characterization thresholds) if removed from the property. Lead levels as high as 726 mg/kg were found on the property with the majority of the samples exhibiting lead levels less than 100 mg/kg. Arsenic levels which exceed its highly conservative (and generally unattainable PRG) were referenced as being indicative of urban background contributions. Hexavalent chromium was not detected at or above laboratory detection limits. Low levels of the organochlorine pesticides 4,4-DDD, 4,4-DDE, 4,4-DDT and chlordane were detected in four of the soil samples and were below applicable PRGs. Chlorinated herbicides were not detected at or above laboratory detection limits in the soil samples analyzed for such constituents. Portions of the South Central Farms property within the subject Site boundaries that were referenced as remaining unassessed included the metal cast and pattern shop/foundry in the southwestern corner of the Site and the gasoline station at 4050 Long Beach Avenue (former address).

In addition to the documents referenced above, AEC was provided with analytical soil data pertaining to the South Central Farms property by the Los Angeles Regional Food Bank. The laboratory data report is dated February 2, 1995 and was generated by the soil and plant tissue testing lab at the University of Massachusetts in Amherst, MA. A total of 20 soil samples (locations and depths not specified) were submitted for analysis. Select soil samples were tested for extractable lead, reported in parts per million (ppm),

with levels ranging from 6 ppm to 19 ppm. Estimated total lead levels ranged from 150 ppm to 346 ppm. In each sample report, it is stated that "the lead level in this soil is low."

5.5.2 Fire Insurance Maps

AEC reviewed fire insurance maps from the years 1920, 1949, 1953, 1954, 1958, 1960, 1963, 1968 and 1970 provided by EDR. Please note that the Site and only adjacent properties to the north (areas south of Martin Luther King Boulevard), south and west are shown on the maps. The results of the map reviews are summarized in the following table:

Fire Insurance Map Review	
Year	**Observations**
1920	**SITE:** The majority of the Site consists of vacant lots and dwellings with associated sheds/garages. A wood planning mill is depicted along the western property line. A building labeled "sign painting" and a carpet shop are present along the southern property boundary. A Los Angeles Furniture factory and associated lumber yard and a facility occupied by the City Refrigeration & Fixture Company are depicted along the eastern property boundary. East 37th Street (now East 40th Place) traverses the Site in an east-west direction. **SURROUNDING AREA:** East Jefferson Avenue (now East Martin Luther King Avenue), East 38th Street (now East 41st Street), South Alameda Street and Long Beach Avenue are shown. The adjacent properties depicted consist primarily of dwellings and vacant lots. A fork factory is depicted to the west across Long Beach Avenue.

Fire Insurance Map Review	
Year	**Observations**
1949	**SITE:** The majority of the northern portion of the Site is occupied by the Los Angeles Period Furniture Company. Other portions of the northern area consist of dwellings. A City Refrigerator Wood Works facility and Utility Trailer manufacturing and repair facility are depicted in the southeastern portion of the Site. A gasoline station is depicted at 4050 Long Beach Boulevard (southeast corner of Long Beach Avenue and 40th Place). A wood working/pattern shop is depicted in the southwest corner of the Site and a building labeled "die casting" is shown along the southern property boundary. **SURROUNDING AREA:** East Jefferson Avenue (now East Martin Luther King Avenue) is labeled as East Santa Barbara Avenue. East 38th Street is now labeled East 41st Street. The adjacent properties appear generally similar to the 1920 maps with less vacant lots evident. Portions of the Los Angeles Period Furniture Company also occupy the northern adjacent property. A carpet cleaning and metal stamping facility are also depicted on the northern adjacent properties. The southeastern adjacent property is labeled "gas and oil in yard". A few stores and a truck yard are depicted on the southern adjacent properties across East 41st Street.
1953, 1954	**SITE:** The Site appears generally similar to the 1949 maps. **SURROUNDING AREA:** Adjacent properties appear similar to the 1949 maps.
1958	**SITE:** The Site appears generally similar to the 1953 and 1954 maps. A foundry is now shown in the southwestern corner of the Site. A sheet metal shop is now shown along the southern property boundary. **SURROUNDING AREA:** Additional portions of the northern adjacent property are occupied by the Los Angeles Period Furniture Company. The majority of the southern adjacent property is used as a truck yard. A metal polishing and wood products facility are visible to the west across Long Beach Avenue.
1960	**SITE:** The Site appears generally similar to the 1958 maps. The die casting and sheet metal shop in the southern portion of the Site are no longer visible (shown as vacant buildings). **SURROUNDING AREA:** Adjacent properties shown on the maps appear similar to the 1958 maps.

Fire Insurance Map Review	
Year	**Observations**
1963	**SITE:** The Site appears generally similar to the 1960 maps. The die casting and sheet metal shop in the southern portion of the Site are now labeled "plastic scrap warehouse" and "furniture manufacturing." The gasoline station at 4050 Long Beach Avenue remains present. **SURROUNDING AREA:** Adjacent properties shown on the maps appear similar to the 1960 maps. A building labeled "electroplating" is shown to the west.
1968	**SITE:** The gasoline station at 4050 Long Beach Avenue is no longer depicted on the map and is now occupied by a portion of the Los Angeles Period Furniture Company. The foundry in the southwestern corner of the Site is now labeled "furniture manufacturing." The plastic scrap warehouse in the southern portion of the Site is now labeled "plastic casting." Other portions of the Site consist of stores, dwellings, and a parking lot. **SURROUNDING AREA:** Adjacent properties shown on the maps appear similar to the 1963 maps.
1970	**SITE:** The Site appears generally similar to the 1968 maps. The wood working/pattern shop and foundry are no longer shown in the southwestern portion of the Site. **SURROUNDING AREA:** Adjacent properties shown on the maps appear similar to the 1968 maps.

Reproductions of the maps are included in Appendix E.

5.5.3 Historic City Directories

AEC reviewed historical city directory listings from several years ranging from 1920 to 2004 provided by EDR. The majority of the Site addresses (historical and current) appear as personal names (indicating residences or small businesses). Several business names of varying natures also appear in the historical directories. The majority of the names are not ones that are indicative of potential sources of contamination at the subject property. A few of the referenced business names raise a potential concern as follows:

- Gasoline service Station at 4050 Long Beach Boulevard (referenced as Joe's Service Station in some directories) - referenced in the 1949, 1953, 1954, 1958, 1960, 1963 and 1968 directories.

- Eastside Pattern and Foundry Company at 1707 East 41st Street - referenced in the 1958, 1960, 1963 and 1968 directories.

- Whiteson Color and Chemical Company at 1733 East 40th Street (shown as a store on historical fire insurance maps) – referenced in the 1967 directory.

Adjacent and nearby properties were reported as used primarily for residential and commercial purposes with some industrial operations noted. Reproductions of the city directories are included in Appendix F.

5.5.4 State of California Division of Oil and Gas Records

According to online resources provided by the California Department of Conservation, Division of Oil, Gas and Geothermal Resources, there are no oil, gas or geothermal wells located on the Site or adjacent properties.

5.5.5 Interview Information

As stated previously, Mr. Tezo Zomac was interviewed by AEC during the preparation of this ESA. Information from this interview is referenced in pertinent sections of this report.

6.0 Site Reconnaissance

The objective of the site reconnaissance was to obtain information indicating the likelihood of any recognized environmental conditions in connection with the Site. This reconnaissance was conducted on Saturday, April 22, 2006 by Mr. Dan Weis, Branch Manager of AEC's San Diego County office. Mr. Weis was escorted by Mr. Tezo Zomac during the site visit.

6.1 Methodology and Limiting Conditions

The site reconnaissance consisted of walking portions of the Site and the public access roads in the surrounding areas of the Site. As stated previously, a Site Map is included as Appendix B of this report. Photographs of the Site were taken to document existing Site conditions and are included and described in Appendix G.

6.2 Chemical Storage

Retail-sized containers (less than 5-gallons) of cleaning, maintenance and pest control products were observed in many of the farm plot areas. Staining of soil was not observed adjacent to such containers. A concrete pad surrounded by chain-linked fencing was observed in the eastern portion of the Site on the north side of East 40th Place. Farming equipment, generators and less than 5-gallon containers of gasoline and oil products were observed in this area. Staining was not observed adjacent to the containers. Aside from the products referenced above, Mr. Zomac was unaware of the storage of chemical products on the Site.

6.3 Waste Generation, Storage and Disposal

Organic waste generated from farming activity at the Site is disposed of in roll-off bins and disposed of weekly by Waste Management. A few small containers of used oil were observed in the storage area referenced in the previous section and are not considered a significant concern. No other evidence of waste generation, storage or disposal was noted by AEC in accessible portions of the Site. Mr. Zomac was unaware of additional waste generation or storage activities at the Site.

6.4 Storage Tanks

No evidence of USTs or ASTs was observed by AEC in accessible portions of the Site. Mr. Rehfeld and Mr. Pirrone were unaware of the presence of tanks on the Site.

6.5 Polychlorinated Biphenyls (PCBs)

Accessible portions of the Site were investigated for the presence of equipment that could contain PCBs. PCBs are toxic coolants or lubricating oils that can be found in oil-filled

equipment such as electrical transformers, capacitors, hydraulic elevators and hydraulic service bay lifts. No hydraulic or suspect PCB-containing equipment was observed. Mr. Zomac were unaware of the presence of such equipment on the Site.

6.6 Other Conditions of Potential Concern

AEC also examined accessible portions of the Site for evidence of the following potential environmental conditions:

Conditions	Not Observed	Observed	Potential Concern?
Chemical/Petroleum Odors	X		No
Pools of Liquid	X		No
Floor Drains/Sumps/Wells	X		No
Stains or Corrosion	X		No
Unidentified Containers	X		No
Stained Soil or Pavement	X		No
Stressed Vegetation	X		No

7.0 Findings, Conclusions and Recommendations of the Phase I ESA

Advantage Environmental Consultants, LLC has performed a Phase I Environmental Site Assessment, in conformance with the scope and limitations of ASTM Practice E 1527-00 at the South Central Farms property in Los Angeles, California.

The documented impacts of subsurface soil on the property resulting from decades of light-industrial use are considered a recognized environmental condition associated with the Site. Based on the information obtained during the preparation of the Phase I ESA portion of this study, which included a review of the prior environmental studies provided to AEC, near-surface soil throughout areas of the project site is impacted with petroleum hydrocarbons (diesel fuel and oil) and heavy metals (particularly lead). However, the levels are not ones that would represent an imminent threat to the environment or persons working on the farm. Other contaminants found during prior studies included organochlorine pesticides and various VOCs and SVOCs. The levels of these compounds reported in the documents reviewed by AEC are considered to be low and were below applicable regulatory action levels.

Other potential areas of concern identified at the site were not addressed in documents reviewed to date by AEC. These areas include:

- Former gasoline station at the southeast corner of East Long Beach Avenue and 40th Place – Parcel 5117-020-029.
- Former metal cast and pattern shop/foundry – northeast corner of East Long Beach Avenue and 41st Street – Parcel 5117-020-029 and -030.
- Potential former drycleaning facility on the southeastern portion of the farm - western portion of 4073 South Alameda Street (Parcel 5117-021-023)

It is our recommendation that these areas be assessed for potentially adverse subsurface soil conditions. Potential contaminants of concern include petroleum hydrocarbons, VOCs and heavy metals. Further assessment of soil conditions for SVOCs or organochlorine pesticide content at the site does not appear to be warranted at this time.

Phase II Environmental Site Assessment

8.0 Field Activities and Methodology

8.1 Pre-Field Activities

Prior to the commencement of field sampling, AEC prepared a health and safety plan that outlined the procedures that AEC's personnel followed to minimize the potential for health and safety hazards during the course of work performed at the property. AEC also notified Underground Service Alert (USA) utility marking service prior to drilling activities (Ticket #A1221493). USA member agencies identified known utility locations in the public right of way areas at the Site (within East 40th Place) and in areas adjacent to the Site.

8.2 Soil Sampling

Twelve soil borings (see Appendix B – Site Plan) were drilled at the Site on March 3, 2006 using limited access direct push sampling equipment. The soil borings were drilled by Hydrogeospectrum of Los Angeles, California under the oversight of AEC. The sampling probes were advanced by hydraulically driving a two-inch diameter rod equipped with a soil sampling tool. Total depths of the soil borings ranged from three to twenty feet below existing grades.

Borings B1 and B2 were drilled to 20 feet below the ground surface at the former gasoline station area at the southeast corner of Long Beach Boulevard and East 40th Place. The remaining 10 soil borings (B3 through B12) were drilled to three feet below existing grades at random locations throughout the Site in a grid pattern and served as a confirmatory assessment of near surface soils (compared to prior studies) and a screening level assessment of current soil conditions throughout the property. Four of the ten borings were drilled in areas to the north of East 40th Place and the remaining six borings were drilled in the southern portion of the site (south of East 40th Place). Two of the borings drilled in the southern portion of the Site also targeted the potential areas of concern at 1707 East 41st Street – former foundry (B3) and 1835 East 41st Street – potential former drycleaner (B7).

Relatively undisturbed soil samples were collected into acetate sleeves at the desired sampling depth by unlocking the drive tip and pushing through the soil. The acetate sleeve containing soil was retrieved, cut, capped, sealed with Parafilm™ and the respective soil samples were labeled. The soil samples were chilled and transported to State-certified analytical laboratories using chain-of-custody protocol. Soil samples were collected at depths of 0.5 foot and 1.5, 3, 5, 10, 15 and 20 feet below grade in soil borings B1 and B2. Soil samples were collected at depths of 0.5 foot, 1.5 feet and 3 feet below grade in borings B3 through B12.

Upon completion of drilling and sampling, the soil borings were backfilled with bentonite chips and capped with concrete or asphalt. Soil sampling equipment was

decontaminated between uses by washing with a non-phosphate detergent solution followed by a distilled water rinse.

8.3 Laboratory Analysis

Initially, the analytical laboratories were instructed to composite every four 0.5-foot samples for TPH, metals and VOC analysis (total of three composite soil samples). In addition, select soil samples from greater depths at the former gasoline station were analyzed for petroleum hydrocarbons and VOCs. The choice of soil samples to be analyzed was conducted by visual observations and in-field photoionization detector (PID) analysis. Remaining portions of the 0.5-foot deep samples and the additional soil samples obtained from the site were held at the analytical laboratories pending initial analysis.

TPH and VOC analyses were completed by Baseline On-Site Analysis of Huntington Beach, California using United States Environmental Protection Agency (EPA) test Methods 8015 modified and 8260B, respectively. Metals analysis was completed by Associated Laboratories of Orange, California using EPA test Methods 6010B and 7471A.

9.0 Results and Discussion

9.1 Subsurface Conditions

Soils underlying the Site to a maximum depth of 20 feet consist primarily of clay/sand mixtures, sand/silt mixtures and medium to coarse sand lenses. Petroleum hydrocarbon staining or odors were neither observed, nor detected in soil samples obtained during this assessment. In-field PID screening was conducted on select soil samples and did not exhibit registerable levels of VOCs on the instrument. Groundwater was not encountered in any of the soil borings.

9.2 Analytical Laboratory Data

As shown in Table 1 (Appendix H), soil samples analyzed for TPH and VOCs did not exhibit levels exceeding laboratory detection limits. A number of metals were detected in the soil samples collected as part of this investigation. The composite soil sample metal concentrations (excluding total chromium) consisting of soil collected from 0.5-foot below the surface (Table 2) were compared to ¼ of the published California Human Health Screening Levels (CHHSLs) for both residential and commercial/industrial land uses. There are currently no published CHHSLs for total chromium. In lieu of this, ¼ of the United State EPA PRGs for residential and industrial soil were used for comparative criteria. CHHSLs and PRGs are risk-based, conservative thresholds calculated based on a target excess lifetime cancer risk of 1 in one million ($1x10^{-6}$).

Levels of metals found in the composite soil samples exceeding one or more of the above referenced action levels are discussed below. Other metals were not found at levels above their respective action levels in the composite samples. A copy of the analytical laboratory reports (including quality control data) and chain of custody documentation are included in Appendix I.

Arsenic

Arsenic levels in composite soil samples ranged from 3.28 to 36.6 mg/kg. The highest level of arsenic (36.6 mg/kg) was found in sample Composite B5, B6, B7, B8-0.5'.

Commonly reported background concentrations of arsenic in California soils are above the CHHSLs for both residential and industrial settings. Background concentrations of arsenic found in California soils as reported by Bradford et al. (March 1996) ranged from 0.6 to 11.0 mg/kg with an arithmetic mean of 3.54 mg/kg. The CHHSLs for residential and commercial/industrial settings for arsenic are 0.07 and 0.24 mg/kg, respectively, with one-quarter of the CHHSLs being significantly lower. Regulatory agencies do not typically require cleanup for arsenic below natural background levels and often consider the use of local or regional background concentrations as clean-up levels.

To further evaluate the distribution of arsenic in the soil borings obtained from the Site during the preparation of this study, the 12 discrete soil samples that comprised the three composite soil samples were analyzed for total arsenic. Arsenic concentrations in eleven of the twelve 0.5-foot soil samples (B1 through B5 and B7 through B12) were within the typical background range for arsenic in California soils and with reported levels varying from 1.94 to 8.09 mg/kg. Arsenic was found at 90.3 mg/kg in the 0.5-foot soil sample of boring B6. This concentration is considered elevated above typical background (even for an urban environment).

Cadmium

Levels of cadmium in the three composite soil samples ranged from 0.77 to 1.10 mg/kg. These levels exceed ¼ of the residential CHHSL (0.425 mg/kg) but did not exceed ¼ of the commercial/industrial CHHSL (1.875 mg/kg). To further evaluate the levels of cadmium in the surficial soil samples obtained from the Site, the 12 discrete soil samples that comprised the three composite soil samples were analyzed for this constituent. Cadmium levels reported in the 12 discrete 0.5-foot soil samples ranged from 0.55 to 1.90 mg/kg. The highest level of cadmium reported (1.90 mg/kg) was found in soil boring B6, which slightly exceeds the residential CHHSL (1.7 mg/kg) but not the commercial/industrial CHHSL (7.5 mg/kg). Cadmium levels reported for the 0.5-foot samples from the remaining soil borings did not exceed its residential or commercial/industrial CHHSL.

Lead

Levels of lead in the three composite soil samples ranged from 72.8 to 147 mg/kg. These levels exceed ¼ of the residential CHHSL (37.5 mg/kg) but did not exceed ¼ of the commercial/industrial CHHSL (875 mg/kg). To further evaluate the levels of lead in the surficial soil samples obtained from the Site, the 12 discrete soil samples that comprised the three composite soil samples were analyzed for this constituent. Lead levels reported in the 12 discrete 0.5-foot soil samples ranged from 17.5 to 354 mg/kg. None of the lead levels exceeded the commercial/industrial CHHSL of 3,500 mg/kg. The 0.5-foot soil samples from the borings B1 (252 mg/kg), B3 (152 mg/kg), B4 (153 mg/kg) and B10 (354 mg/kg) exceeded the residential lead CHHSL of 150 mg/kg.

10.0 Conclusions of the Phase II ESA

Based on the results of the Phase II ESA completed by AEC at the Site, surficial soils at in the areas tested by AEC do not appear to be impacted by with petroleum hydrocarbons or VOCs. In addition, neither of these potential contaminants were found in subsurface soil samples collected from the former gasoline station at the southeast corner of Long Beach Avenue and East 40th Place.

Levels of the metals arsenic, cadmium and lead exceeded their respective CHHSLs in select surficial soil samples obtained from the study area. However, the levels are not ones that would represent an imminent threat to the environment or persons working on the farm.

11.0 Recommendations and Limitations of the Phase II ESA

Based on the results of the soil sampling and analysis completed by AEC during the preparation of this assessment, additional assessment for TPH, VOCs and metals (excluding arsenic) does not appear to be warranted at this time. If TPL (or the future landowner) desires to take a conservative approach toward the level of arsenic found in soil boring B6 (90.3 mg/kg), soil in the vicinity of this boring can be excavated and disposed of at an offsite landfill or recycling facility. Confirmation soil sampling and analysis will be required to ensure that the soil with the elevated arsenic levels is removed. In addition, no soil should be exported from the Site without evaluation of metals levels with respect to applicable waste characterization criteria. It is our understanding that export of soil from the Site is not planned at this time.

AEC's conclusions regarding the Site are based on the results of a limited subsurface sampling effort. Levels of contaminants measured at a given location may not be representative of conditions in other areas on the Site. In addition, conditions may change at any particular location as a function of time in response to natural conditions, chemical reactions and other factors. Our conclusion regarding the condition of the Site does not represent a warranty that all areas of the Site are similar to those sampled. In addition, this assessment is not meant to serve as an evaluation of the potential uptake of metals to fruits or vegetables grown on the farm. Comparative criteria for metals in soil with respect to plant uptake are not published at this time.

12.0 References

ASTM, "Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process," ASTM Designation E 1527-00, Published July 2000;

Bradford et al. (1996). Background Concentrations of Trace and Major Elements in California Soils. Kearney Foundation of Soil Science Division of Agriculture and Natural Resources, University of California.

California Regional Water Quality Control Board. California State Water Resources Control Plan for the Los Angeles Region, Published 1994.

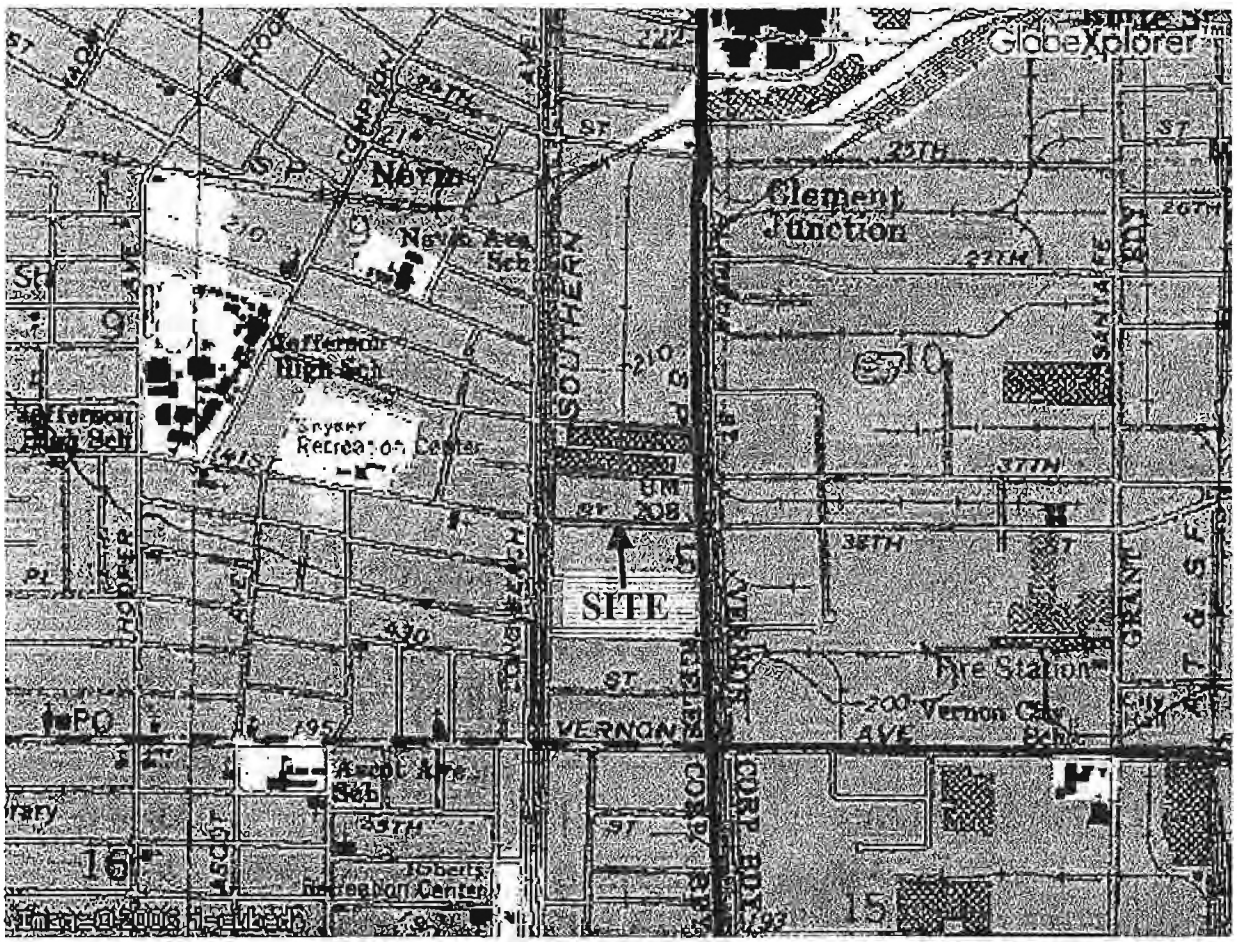
Historical fire insurance maps and city directory listings provided by EDR;

Previous Environmental Reports (see Section 5.5.1);

State of California Department of Conservation, Division of Oil and Gas And Geothermal Resources: http://www.consrv.ca.gov/DOG/maps/index_map.htm;

USGS topographic map, Los Angeles, California Quadrangle (1994).

APPENDIX A
VICINITY MAP



*from Los Angeles, CA 7.5' topographic quadrangle (1994)

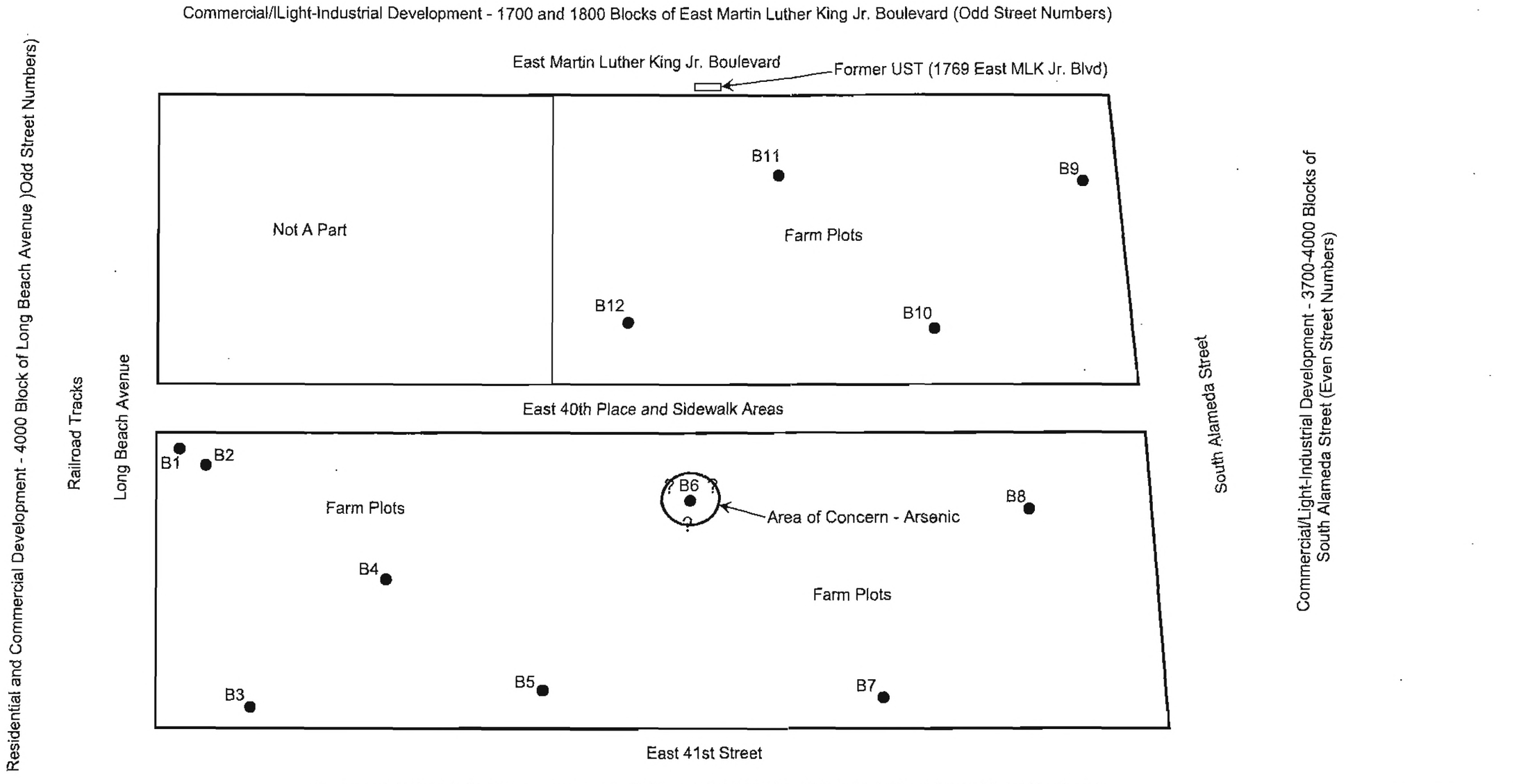
ADVANTAGE CONSULTANTS, LLC.

810 Los Vallecitos Boulevard, Suite 210
San Marcos, CA 92069
Phone: 760744-3363 Fax 760744-3383

Vicinity Map
South Central Farms
Los Angeles, California

Work Order No.:	Report Date:	Drawn By:
06-027SD	May 2006	DAW

APPENDIX B
SITE PLAN



Appendix C - Site Map - South Central Farms

APPENDIX C
EDR REGULATORY DATABASE REPORT



EDR® Environmental
Data Resources Inc

The EDR Radius Map
with GeoCheck®

1720 E 40th Place
1720 E 40th Place
Los Angeles, CA 90058

Inquiry Number: 1659051.2s

April 20, 2006

The Standard in Environmental Risk Management Information

440 Wheelers Farms Road
Milford, Connecticut 06461

Nationwide Customer Service

Telephone: 1-800-352-0050
Fax: 1-800-231-6802
Internet: www.edrnet.com

TABLE OF CONTENTS

SECTION	PAGE
Executive Summary	ES1
Overview Map	2
Detail Map	3
Map Findings Summary	4
Map Findings	6
Orphan Summary	78
Government Records Searched/Data Currency Tracking	GR-1

GEOCHECK ADDENDUM

Physical Setting Source Addendum	A-1
Physical Setting Source Summary	A-2
Physical Setting Source Map	A-8
Physical Setting Source Map Findings	A-9
Physical Setting Source Records Searched	A-19

Thank you for your business.
Please contact EDR at 1-800-352-0050
with any questions or comments.

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EXECUTIVE SUMMARY

A search of available environmental records was conducted by Environmental Data Resources, Inc (EDR). The report was designed to assist parties seeking to meet the search requirements of EPA's Standards and Practices for All Appropriate Inquiries (40 CFR Part 312), the ASTM Standard Practice for Environmental Site Assessments (E 1527-05) or custom requirements developed for the evaluation of environmental risk associated with a parcel of real estate.

TARGET PROPERTY INFORMATION

ADDRESS

1720 E 40TH PLACE
LOS ANGELES, CA 90058

COORDINATES

Latitude (North):	34.009000 - 34° 0' 32.4"
Longitude (West):	118.242500 - 118° 14' 33.0"
Universal Tranverse Mercator:	Zone 11
UTM X (Meters):	385263.9
UTM Y (Meters):	3763655.2
Elevation:	209 ft. above sea level

USGS TOPOGRAPHIC MAP ASSOCIATED WITH TARGET PROPERTY

Target Property Map:	34118-A2 LOS ANGELES, CA
Most Recent Revision:	1994
South Map:	33118-H2 SOUTH GATE, CA
Most Recent Revision:	1994
Southwest Map:	33118-H3 INGLEWOOD, CA
Most Recent Revision:	1994
West Map:	34118-A3 HOLLYWOOD, CA
Most Recent Revision:	1994

TARGET PROPERTY SEARCH RESULTS

The target property was not listed in any of the databases searched by EDR.

DATABASES WITH NO MAPPED SITES

No mapped sites were found in EDR's search of available ("reasonably ascertainable ") government records either on the target property or within the search radius around the target property for the following databases:

FEDERAL RECORDS

NPL..... National Priority List

EXECUTIVE SUMMARY

Proposed NPL	Proposed National Priority List Sites
Delisted NPL	National Priority List Deletions
NPL RECOVERY	Federal Superfund Liens
CORRACTS	Corrective Action Report
RCRA-TSDF	Resource Conservation and Recovery Act Information
RCRA-LQG	Resource Conservation and Recovery Act Information
ERNS	Emergency Response Notification System
HMIRS	Hazardous Materials Information Reporting System
US ENG CONTROLS	Engineering Controls Sites List
US INST CONTROL	Sites with Institutional Controls
DOD	Department of Defense Sites
FUDS	Formerly Used Defense Sites
US BROWNFIELDS	A Listing of Brownfields Sites
CONSENT	Superfund (CERCLA) Consent Decrees
ROD	Records Of Decision
UMTRA	Uranium Mill Tailings Sites
ODI	Open Dump Inventory
TRIS	Toxic Chemical Release Inventory System
TSCA	Toxic Substances Control Act
FTTS	FIFRA/ TSCA Tracking System - FIFRA (Federal Insecticide, Fungicide, & Rodenticide Act)/TSCA (Toxic Substances Control Act)
SSTS	Section 7 Tracking Systems
PADS	PCB Activity Database System
MLTS	Material Licensing Tracking System
MINES	Mines Master Index File
FINDS	Facility Index System/Facility Registry System
RAATS	RCRA Administrative Action Tracking System

STATE AND LOCAL RECORDS

CA BOND EXP. PLAN	Bond Expenditure Plan
NFA	No Further Action Determination
NFE	Properties Needing Further Evaluation
REF	Unconfirmed Properties Referred to Another Agency
SCH	School Property Evaluation Program
Toxic Pits	Toxic Pits Cleanup Act Sites
CA WDS	Waste Discharge System
SWRCY	Recycler Database
AOCONCERN	San Gabriel Valley Areas of Concern
AST	Aboveground Petroleum Storage Tank Facilities
CHMIRS	California Hazardous Material Incident Report System
Notify 65	Proposition 65 Records
LA Co. Site Mitigation	Site Mitigation List
DEED	Deed Restriction Listing
VCP	Voluntary Cleanup Program Properties
LOS ANGELES CO. HMS	HMS: Street Number List
WIP	Well Investigation Program Case List
CDL	Clandestine Drug Labs
HAZNET	Facility and Manifest Data
EMI	Emissions Inventory Data

TRIBAL RECORDS

INDIAN RESERV	Indian Reservations
INDIAN LUST	Leaking Underground Storage Tanks on Indian Land

EXECUTIVE SUMMARY

INDIAN UST..... Underground Storage Tanks on Indian Land

EDR PROPRIETARY RECORDS

Manufactured Gas Plants... EDR Proprietary Manufactured Gas Plants
EDR Historical Auto StationsEDR Proprietary Historic Gas Stations

SURROUNDING SITES: SEARCH RESULTS

Surrounding sites were identified.

Elevations have been determined from the USGS Digital Elevation Model and should be evaluated on a relative (not an absolute) basis. Relative elevation information between sites of close proximity should be field verified. Sites with an elevation equal to or higher than the target property have been differentiated below from sites with an elevation lower than the target property.
Page numbers and map identification numbers refer to the EDR Radius Map report where detailed data on individual sites can be reviewed.

Sites listed in ***bold italics*** are in multiple databases.

Unmappable (orphan) sites are not considered in the foregoing analysis.

FEDERAL RECORDS

CERCLIS: The Comprehensive Environmental Response, Compensation and Liability Information System contains data on potentially hazardous waste sites that have been reported to the USEPA by states, municipalities, private companies and private persons, pursuant to Section 103 of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA). CERCLIS contains sites which are either proposed to or on the National Priorities List (NPL) and sites which are in the screening and assessment phase for possible inclusion on the NPL.

A review of the CERCLIS list, as provided by EDR, and dated 02/01/2006 has revealed that there is 1 CERCLIS site within approximately 0.5 miles of the target property.

Lower Elevation	Address	Dist / Dir	Map ID	Page
A A D DISPOSAL	*2306 38TH ST*	*1/4 - 1/2 E*	*Q50*	*67*

CERCLIS-NFRAP: Archived sites are sites that have been removed and archived from the inventory of CERCLIS sites. Archived status indicates that, to the best of EPA's knowledge, assessment at a site has been completed and that EPA has determined no further steps will be taken to list this site on the National Priorities List (NPL), unless information indicates this decision was not appropriate or other considerations require a recommendation for listing at a later time. This decision does not necessarily mean that there is no hazard associated with a given site; it only means that, based upon available information, the location is not judged to be a potential NPL site.

A review of the CERC-NFRAP list, as provided by EDR, and dated 02/01/2006 has revealed that there is 1 CERC-NFRAP site within approximately 0.5 miles of the target property.

Equal/Higher Elevation	Address	Dist / Dir	Map ID	Page
RENU PLATING CORP	*1531 E 32ND ST*	*1/4 - 1/2 NW*	*P56*	*65*

EXECUTIVE SUMMARY

RCRAInfo: RCRAInfo is EPA's comprehensive information system, providing access to data supporting the Resource Conservation and Recovery Act (RCRA) of 1976 and the Hazardous and Solid Waste Amendments (HSWA) of 1984. RCRAInfo replaces the data recording and reporting abilities of the Resource Conservation and Recovery Information System(RCRIS). The database includes selective information on sites which generate, transport, store , treat and/or dispose of hazardous waste as defined by the Resource Conservation and Recovery Act (RCRA). Conditionally exempt small quantity generators (CESQGs) generate less than 100 kg of hazardous waste, or less than 1 kg of acutely hazardous waste per month. Small quantity generators (SQGs) generate between 100 kg and 1,000 kg of hazardous waste per month Large quantity generators generate over 1,000 kilograms (kg) of hazardous waste, or over 1 kg of acutely hazardous waste per month. Transporters are individuals or entities that move hazardous waste from the generator offsite to a facility that can recycle, treat, store, or dispose of the waste. TSDFs treat, store, or dispose of the waste.

A review of the RCRA-SQG list, as provided by EDR, and dated 02/24/2006 has revealed that there are 14 RCRA-SQG sites within approximately 0.25 miles of the target property.

Equal/Higher Elevation	Address	Dist / Dir	Map ID	Page
SINGER CO. LA PERIOD FURNITURE	*1838 EAST SANTA BARBARA*	*0 - 1/8*	*7*	*9*
OMEGA ENVIRONMENTAL SERVICES I	*1755 E MARTIN LUTHER KI*	*0 - 1/8 W*	*B9*	*10*
OLIN CORP OLIN WATER SERVICES	*3312 E LONG BEACH AVE*	*0 - 1/8 WNW*	*21*	*20*
LEARONAL	*2910 S ALAMEDA ST*	*1/8 - 1/4 N*	*H31*	*38*
NATIONAL SERV IND SELIG CHEM I	*2840 S ALAMEDA*	*1/8 - 1/4 N*	*H34*	*39*
P&Y T SHIRT	*1844 E 27 ST*	*1/8 - 1/4 N*	*K41*	*45*

Lower Elevation	Address	Dist / Dir	Map ID	Page
WALTER MILLER EXPRESS CLEANER	*1835 E 41ST ST*	*0 - 1/8*	*1*	*6*
ALAMEDA PAINTING CO INC	*1714 E 41ST ST*	*0 - 1/8*	*4*	*8*
UTILITY TRAILORS	*4073 S ALAMEDA ST*	*0 - 1/8*	*A6*	*8*
CEDERGREN RETINNING CO INC	*1845 E 41ST PL*	*0 - 1/8 S*	*D14*	*13*
BOGUSLAVSKY BORIS	*1842 E 41ST PLACE*	*0 - 1/8 S*	*D16*	*14*
WEST COAST BULLETS	*1871 E 42ND ST*	*1/8 - 1/4 S*	*E22*	*21*
DAP INC	*2121 E 37TH ST*	*1/8 - 1/4 E*	*33*	*39*
SURE DELIVERY SERVICE INC	*1874 E 43RD ST*	*1/8 - 1/4 S*	*37*	*42*

STATE AND LOCAL RECORDS

AWP: California DTSC's Annual Workplan, formerly known as BEP, identifies known hazardous substance sites targeted for cleanup. The source is the California Environmental Protection Agency.

A review of the AWP list, as provided by EDR, and dated 08/08/2005 has revealed that there are 3 AWP sites within approximately 1 mile of the target property.

Equal/Higher Elevation	Address	Dist / Dir	Map ID	Page
RENU PLATING COMPANY INC	*1531 EAST 32ND STREET*	*1/4 - 1/2 NW*	*P55*	*63*
AMTRAK	*2435 E WASHINGTON BLVD*	*1/2 - 1 NE*	*61*	*71*

Lower Elevation	Address	Dist / Dir	Map ID	Page
AAD	*2306 E. 38TH STREET*	*1/4 - 1/2 E*	*Q59*	*66*

EXECUTIVE SUMMARY

CAL-SITES: Formerly known as ASPIS, this database contains both known and potential hazardous substance sites. The source is the California Department of Toxic Substance Control.

A review of the Cal-Sites list, as provided by EDR, and dated 08/08/2005 has revealed that there are 3 Cal-Sites sites within approximately 1 mile of the target property.

Equal/Higher Elevation	Address	Dist / Dir	Map ID	Page
RENU PLATING COMPANY INC	*1531 EAST 32ND STREET*	*1/4 - 1/2 NW*	*P55*	*63*
Facility Status: ANNUAL WORKPLAN (AWP) - ACTIVE SITE				
AMTRAK	*2435 E WASHINGTON BLVD*	*1/2 - 1 NE*	*61*	*71*
Facility Status: ANNUAL WORKPLAN (AWP) - ACTIVE SITE				

Lower Elevation	Address	Dist / Dir	Map ID	Page
AAD	*2306 E. 38TH STREET*	*1/4 - 1/2 E*	*Q59*	*66*
Facility Status: ANNUAL WORKPLAN (AWP) - ACTIVE SITE				

SWF/LF: The Solid Waste Facilities/Landfill Sites records typically contain an inventory of solid waste disposal facilities or landfills in a particular state. The data come from the Integrated Waste Management Board's Solid Waste Information System (SWIS) database.

A review of the SWF/LF list, as provided by EDR, and dated 03/13/2006 has revealed that there is 1 SWF/LF site within approximately 0.5 miles of the target property.

Lower Elevation	Address	Dist / Dir	Map ID	Page
AZTECA RUBBISH	1742 EAST 43RD STREET	1/8 - 1/4 S	J40	44

WMUDS/SWAT: The Waste Management Unit Database System is used for program tracking and inventory of waste management units. The source is the State Water Resources Control Board.

A review of the WMUDS/SWAT list, as provided by EDR, and dated 04/01/2000 has revealed that there is 1 WMUDS/SWAT site within approximately 0.5 miles of the target property.

Equal/Higher Elevation	Address	Dist / Dir	Map ID	Page
METRO-VERNON	SE OF ALAMEDA / 25TH	1/4 - 1/2 N	O54	63

CORTESE: This database identifies public drinking water wells with detectable levels of contamination, hazardous substance sites selected for remedial action, sites with known toxic material identified through the abandoned site assessment program, sites with USTs having a reportable release and all solid waste disposal facilities from which there is known migration. The source is the California Environmental Protection Agency/Office of Emergency Information.

A review of the Cortese list, as provided by EDR, and dated 04/01/2001 has revealed that there are 5 Cortese sites within approximately 0.5 miles of the target property.

Equal/Higher Elevation	Address	Dist / Dir	Map ID	Page
CRESCENT TRUCK LINES	*2910 ROSS ST*	*1/8 - 1/4 ENE*	*F24*	*22*
BOYS MARKET WAREHOUSE	*2652 LONG BEACH AVE W*	*1/4 - 1/2 NNW*	*48*	*54*
SOUTHWEST POLICE STATION 9/8-2	*1546 MARTIN LUTHER KING*	*1/4 - 1/2 WNW*	*53*	*60*
RENU PLATING COMPANY INC	1531 32ND	1/4 - 1/2 NW	P57	65

Lower Elevation	Address	Dist / Dir	Map ID	Page
WILLIAMS WAREHOUSE	1925 VERNON	1/4 - 1/2 SSE	M49	56

EXECUTIVE SUMMARY

LUST: The Leaking Underground Storage Tank Incident Reports contain an inventory of reported leaking underground storage tank incidents. The data come from the State Water Resources Control Board Leaking Underground Storage Tank Information System.

A review of the LUST list, as provided by EDR, and dated 01/09/2006 has revealed that there are 4 LUST sites within approximately 0.5 miles of the target property.

Equal/Higher Elevation	Address	Dist / Dir	Map ID	Page
CRESCENT TRUCK LINES Facility Status: Case Closed	*2910 ROSS ST*	*1/8 - 1/4 ENE*	*F24*	*22*
BOYS MARKET WAREHOUSE Facility Status: Case Closed	*2652 LONG BEACH AVE W*	*1/4 - 1/2 NNW*	*48*	*54*
SOUTHWEST POLICE STATION 9/8-2 Facility Status: Leak being confirmed	*1546 MARTIN LUTHER KING*	*1/4 - 1/2 WNW*	*53*	*60*

Lower Elevation	Address	Dist / Dir	Map ID	Page
WILLIAMS WAREHOUSE Facility Status: Case Closed	1925 VERNON AVE E	1/4 - 1/2 SSE	M50	56

CA FID: The Facility Inventory Database contains active and inactive underground storage tank locations. The source is the State Water Resource Control Board.

A review of the CA FID UST list, as provided by EDR, and dated 10/31/1994 has revealed that there are 8 CA FID UST sites within approximately 0.25 miles of the target property.

Equal/Higher Elevation	Address	Dist / Dir	Map ID	Page
KEN WESGARTH CONSTRUCTION	1755 E MARTIN LUTHER KI	0 - 1/8 W	B11	10
OLIN CORP OLIN WATER SERVICES	*3312 E LONG BEACH AVE*	*0 - 1/8 WNW*	*21*	*20*

Lower Elevation	Address	Dist / Dir	Map ID	Page
UTILITY TRAILER SALES COMPANY	*4101 S ALAMEDA ST*	*0 - 1/8*	*A2*	*6*
EMMDI INCORPORATED	*1862 E 41ST PL*	*0 - 1/8 S*	*D13*	*12*
CEDERGREEN REFINING COMPANY	*1845 E 41ST PL*	*0 - 1/8 S*	*D15*	*13*
UTILITY TRAILER SALES CO	*1769 E 41ST PL*	*0 - 1/8 S*	*17*	*14*
SOUTHLAND METALS	*1850 E 42ND ST*	*1/8 - 1/4 S*	*E23*	*22*
MOBIL SERVICE STATION VARTAN E	*4321 S ALAMEDA ST*	*1/8 - 1/4 S*	*L45*	*52*

CA SLIC: SLIC Region comes from the California Regional Water Quality Control Board.

A review of the SLIC list, as provided by EDR, and dated 01/09/2006 has revealed that there are 3 SLIC sites within approximately 0.5 miles of the target property.

Equal/Higher Elevation	Address	Dist / Dir	Map ID	Page
M-5 STEEL	2901 SACO	1/4 - 1/2 E	N51	58
M-5 STEEL Facility Status: Case Open	*2901 SACO ST*	*1/4 - 1/2 E*	*N52*	*59*
ACTA PARCEL MC-697 EAST Facility Status: Case Closed	1830 25TH STREET, EAST	1/4 - 1/2 N	O58	66

EXECUTIVE SUMMARY

UST: The Underground Storage Tank database contains registered USTs. USTs are regulated under Subtitle I of the Resource Conservation and Recovery Act (RCRA). The data come from the State Water Resources Control Board's Hazardous Substance Storage Container Database.

A review of the UST list, as provided by EDR, and dated 01/09/2006 has revealed that there are 3 UST sites within approximately 0.25 miles of the target property.

Equal/Higher Elevation	Address	Dist / Dir	Map ID	Page
LA HARBOR DEPT	1786 E MARTIN LUTHER KI	0 - 1/8	5	8
KEN WESGARTH CONSTRUCTION	1755 E MARTIN LUTHER KI	0 - 1/8 W	B10	10
Lower Elevation	**Address**	**Dist / Dir**	**Map ID**	**Page**
VERNON FUEL DISTRIBUTIONINC.	4321 S ALAMEDA ST	1/8 - 1/4 S	L46	53

HIST UST: Historical UST Registered Database.

A review of the HIST UST list, as provided by EDR, and dated 10/15/1990 has revealed that there are 11 HIST UST sites within approximately 0.25 miles of the target property.

Equal/Higher Elevation	Address	Dist / Dir	Map ID	Page
REEDER FASTWAY TRUCKING	*2043 ROSS ST*	*0 - 1/8 NE*	*C18*	*15*
LOS ANGELES BY PRODUCTS	*2065 ROSS ST*	*0 - 1/8 ENE*	*20*	*19*
CRESCENT TRUCK LINES (TRUCKING	2910 ROSS ST	1/8 - 1/4 ENE	F25	26
BILL'S TRUCKING INC	3575 ROSS ST	1/8 - 1/4 E	G28	34
ALAMEDA	*1862 E 27TH ST*	*1/8 - 1/4 NNE*	*K43*	*49*
Lower Elevation	**Address**	**Dist / Dir**	**Map ID**	**Page**
VERNON WAREHOUSE COMPANY	*2050 E 38TH ST*	*0 - 1/8 E*	*19*	*16*
SHEFFIELD FURNITURE CORP.	*2100 E 38TH ST*	*1/8 - 1/4 E*	*27*	*31*
BERKOFF'S ROASTING MILL	2110 E 37TH ST	1/8 - 1/4 E	G30	38
EVER-FRESH FOODS COMPANY	4200 S ALAMEDA ST	1/8 - 1/4 S	I35	40
JIM'S ARCO STATION	4321 S ALAMEDA ST	1/8 - 1/4 S	L44	50
JIM'S ARCO	4321 S ALAMEDA ST	1/8 - 1/4 S	L47	53

SWEEPS: Statewide Environmental Evaluation and Planning System. This underground storage tank listing was updated and maintained by a company contacted by the SWRCB in the early 1980's. The listing is no longer updated or maintained. The local agency is the contact for more information on a site on the SWEEPS list.

A review of the SWEEPS UST list, as provided by EDR, and dated 06/01/1994 has revealed that there are 19 SWEEPS UST sites within approximately 0.25 miles of the target property.

Equal/Higher Elevation	Address	Dist / Dir	Map ID	Page
AVON TRANSPORT	*2030 ROSS ST*	*0 - 1/8 NE*	*C12*	*11*
REEDER FASTWAY TRUCKING	*2043 ROSS ST*	*0 - 1/8 NE*	*C18*	*15*
LOS ANGELES BY PRODUCTS	*2065 ROSS ST*	*0 - 1/8 ENE*	*20*	*19*
OLIN CORP OLIN WATER SERVICES	*3312 E LONG BEACH AVE*	*0 - 1/8 WNW*	*21*	*20*
CRESCENT TRUCK LINES	*2910 ROSS ST*	*1/8 - 1/4 ENE*	*F24*	*22*
T C I LEASING	*2920 ROSS ST*	*1/8 - 1/4 ENE*	*F26*	*27*
VECTA TRANSPORTATION SYSTEM	*3575 ROSS ST*	*1/8 - 1/4 E*	*G29*	*34*
L.A. BY-PRODUCTS CO.	2860 ALAMEDA ST	1/8 - 1/4 N	H32	38
CATALINA PACIFIC CONCRETE	1862 E 27TH ST	1/8 - 1/4 NNE	K42	45

EXECUTIVE SUMMARY

Lower Elevation	Address	Dist / Dir	Map ID	Page
UTILITY TRAILER SALES COMPANY	*4101 S ALAMEDA ST*	*0 - 1/8*	*A2*	*6*
UTILITY TRAILER CO CORP	1801 E 41ST ST	0 - 1/8	3	7
EMMDI INCORPORATED	*1862 E 41ST PL*	*0 - 1/8 S*	*D13*	*12*
CEDERGREEN REFINING COMPANY	*1845 E 41ST PL*	*0 - 1/8 S*	*D15*	*13*
UTILITY TRAILER SALES CO	*1769 E 41ST PL*	*0 - 1/8 S*	*17*	*14*
VERNON WAREHOUSE COMPANY	*2050 E 38TH ST*	*0 - 1/8 E*	*19*	*16*
SOUTHLAND METALS	*1850 E 42ND ST*	*1/8 - 1/4 S*	*E23*	*22*
SHEFFIELD FURNITURE CORP.	*2100 E 38TH ST*	*1/8 - 1/4 E*	*27*	*31*
DAIRY FRESH PRODUCTS CO.	4200 ALAMEDA ST	1/8 - 1/4 S	I36	41
MOBIL SERVICE STATION VARTAN E	*4321 S ALAMEDA ST*	*1/8 - 1/4 S*	*L45*	*52*

DRYCLEANERS: A list of drycleaner related facilities that have EPA ID numbers. These are facilities with certain SIC codes: power laundries, family and commercial; garment pressing and cleaners' agents; linen supply; coin-operated laundries and cleaning; drycleaning plants except rugs; carpet and upholster cleaning; industrial launderers; laundry and garment services.

A review of the CLEANERS list, as provided by EDR, and dated 04/18/2005 has revealed that there are 2 CLEANERS sites within approximately 0.25 miles of the target property.

Lower Elevation	Address	Dist / Dir	Map ID	Page
WALTER MILLER EXPRESS CLEANER	*1835 E 41ST ST*	*0 - 1/8*	*1*	*6*
WESTERN TRUCK & TRAILER	1839 E 43RD ST	1/8 - 1/4 S	38	43

EDR PROPRIETARY RECORDS

EDR Historical Cleaners: EDR has searched selected national collections of business directories and has collected listings of potential dry cleaner sites that were available to EDR researchers. EDR's review was limited to those categories of sources that might, in EDR's opinion, include dry cleaning establishments. The categories reviewed included, but were not limited to dry cleaners, cleaners, laundry, laundromat, cleaning/laundry, wash & dry etc.

A review of the EDR Historical Cleaners list, as provided by EDR, has revealed that there is 1 EDR Historical Cleaners site within approximately 0.25 miles of the target property.

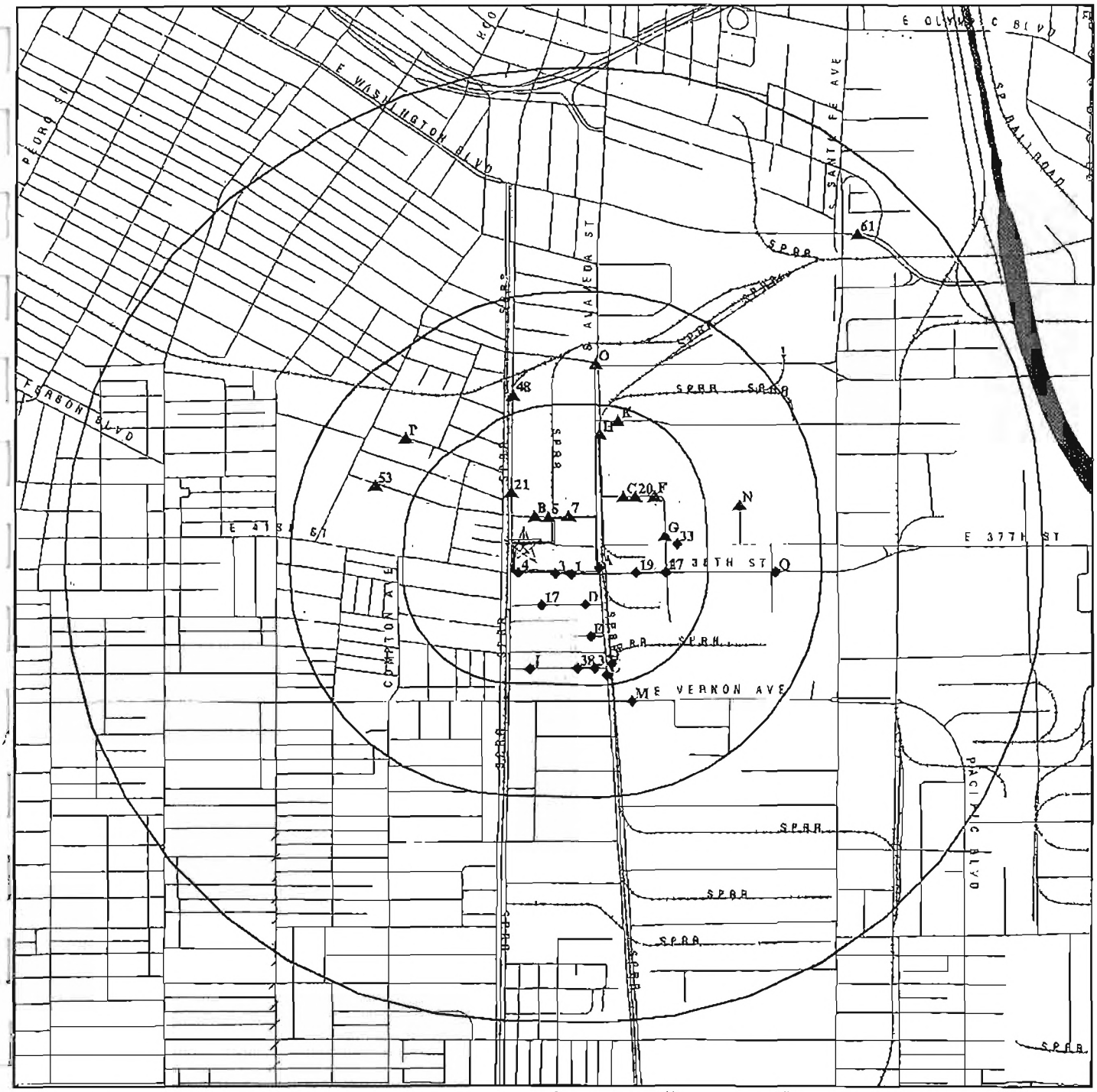
Lower Elevation	Address	Dist / Dir	Map ID	Page
KRCMBACH A C	1748 E 43D	1/8 - 1/4 S	J39	43

EXECUTIVE SUMMARY

Due to poor or inadequate address information, the following sites were not mapped:

Site Name	Database(s)
AAD DISTRIBUTION & DRY CLEANING SE	RCRA-LQG, RCRA-TSDF, CORRACTS
SAFE WAY CLEANERS	CERCLIS, FINDS
2600 E 28TH STREET	HMIRS
VALL;EY BLVD + E 20TH ST	ERNS
W8 VENTURA HWY/1/2MI E OF FOREST L	ERNS
LANCER SITE	US BROWNFIELDS
THE E.B. MALONE CORPORATION	SLIC
MARA E C	EDR Historical Auto Stations
LANSING W E	EDR Historical Auto Stations
LONG H E	EDR Historical Auto Stations
HARTMAN E C	EDR Historical Auto Stations
MC CORMICK W E	EDR Historical Auto Stations
WAGSTAFF G E	EDR Historical Auto Stations
BROWN E J	EDR Historical Auto Stations
RUDEY E D	EDR Historical Auto Stations
BEIGE E J	EDR Historical Auto Stations
HECHLER E C	EDR Historical Auto Stations
SPEARS R E	EDR Historical Auto Stations
ENCELL C E	EDR Historical Auto Stations
FIELDS T E	EDR Historical Auto Stations
GRIEWE R E	EDR Historical Auto Stations
ROBERTS E H	EDR Historical Auto Stations
WARD R E	EDR Historical Auto Stations
OHARA E F	EDR Historical Auto Stations
RICHARDSON C E	EDR Historical Auto Stations
CHASSE D E	EDR Historical Auto Stations
BUNCH E J	EDR Historical Auto Stations
COLE F E	EDR Historical Auto Stations
BIERHAUS L E	EDR Historical Auto Stations
CUMMINS H E	EDR Historical Auto Stations
PLIMPTON J E	EDR Historical Auto Stations
BATES H E	EDR Historical Auto Stations
BONES PLACE	EDR Historical Cleaners
RUCKER R E	EDR Historical Cleaners
BACK E	EDR Historical Cleaners
JUAREZ E C	EDR Historical Cleaners
MC DONALD J E	EDR Historical Cleaners
MC DONNELL J E	EDR Historical Cleaners
BROWN F E	EDR Historical Cleaners
DE FORD I E MRS	EDR Historical Cleaners
WALTERS R E	EDR Historical Cleaners
PERKINS E W	EDR Historical Cleaners

OVERVIEW MAP - 1659051.2s



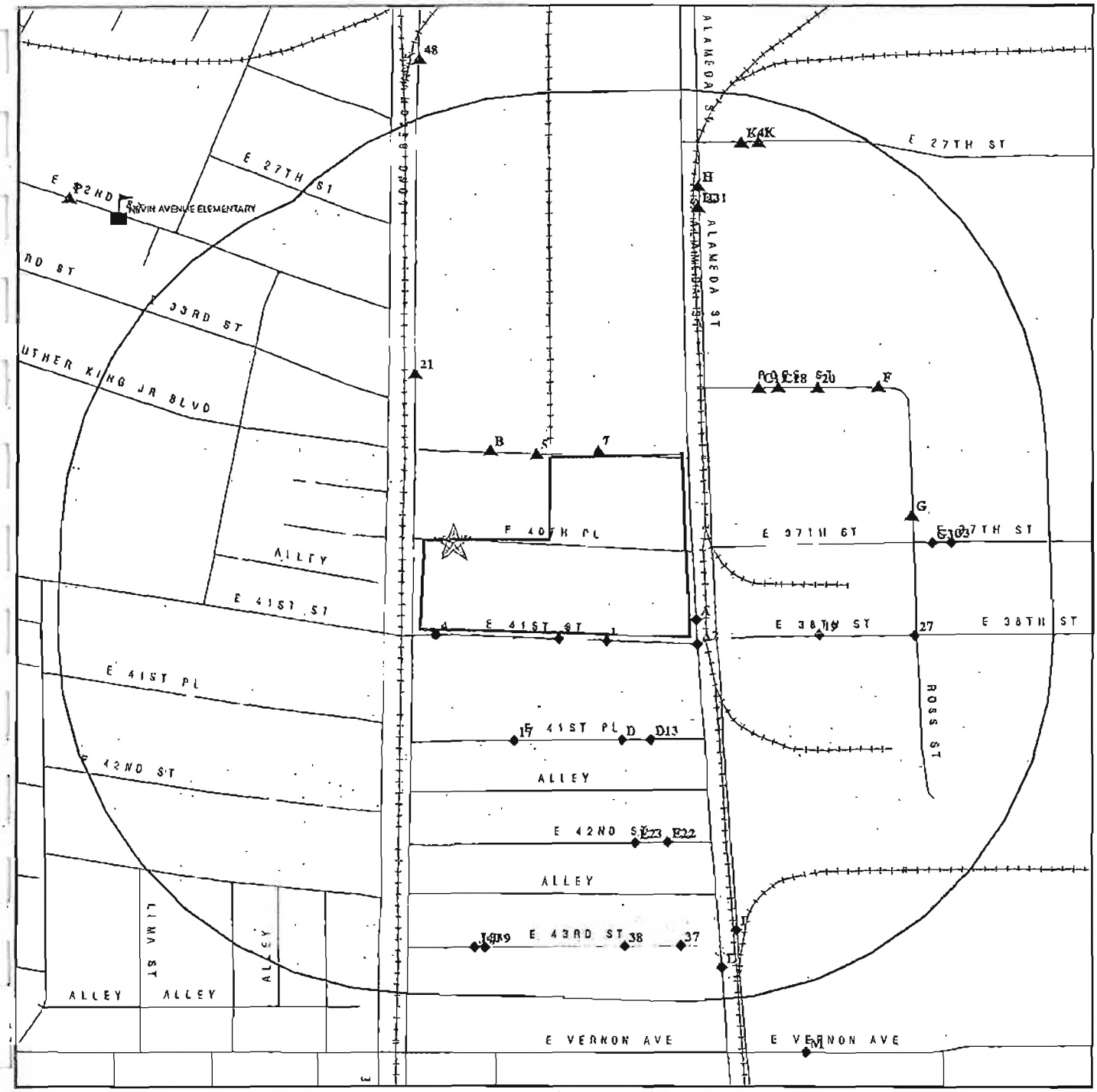
- Target Property
- Sites at elevations higher than or equal to the target property
- Sites at elevations lower than the target property
- Manufactured Gas Plants
- National Priority List Sites
- Landfill Sites
- Dept. Defense Sites
- Indian Reservations BIA
- Power transmission lines
- Oil & Gas pipelines
- 100-year flood zone
- 500-year flood zone
- Areas of Concern

This report includes Interactive Map Layers to display and/or hide map information. The legend includes only those icons for the default map view.

SITE NAME: 1720 E 40th Place ADDRESS: 1720 E 40th Place Los Angeles CA 90058 LAT/LONG: 34.0090 / 118.2425	CLIENT: Advantage Env. Consultants LLC CONTACT: Dan Wels INQUIRY #: 1659051.2s DATE: April 20, 2006

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DETAIL MAP - 1659051.2s



- Target Property
- Sites at elevations higher than or equal to the target property
- Sites at elevations lower than the target property
- Manufactured Gas Plants
- Sensitive Receptors
- National Priority List Sites
- Landfill Sites
- Dept. Defense Sites
- Indian Reservations BIA
- Oil & Gas pipelines
- 100-year flood zone
- 500-year flood zone
- Areas of Concern

This report includes Interactive Map Layers to display and/or hide map information. The legend includes only those icons for the default map view.

SITE NAME: 1720 E 40th Place ADDRESS: 1720 E 40th Place Los Angeles CA 90058 LAT/LONG: 34.0090 / 118.2425	CLIENT: Advantage Env. Consultants LLC CONTACT: Dan Weis INQUIRY #: 1659051.2s DATE: April 20, 2006

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MAP FINDINGS SUMMARY

Database	Target Property	Search Distance (Miles)	< 1/8	1/8 - 1/4	1/4 - 1/2	1/2 - 1	> 1	Total Plotted
FEDERAL RECORDS								
NPL		1.000	0	0	0	0	NR	0
Proposed NPL		1.000	0	0	0	0	NR	0
Delisted NPL		1.000	0	0	0	0	NR	0
NPL RECOVERY		TP	NR	NR	NR	NR	NR	0
CERCLIS		0.500	0	0	1	NR	NR	1
CERC-NFRAP		0.500	0	0	1	NR	NR	1
CORRACTS		1.000	0	0	0	0	NR	0
RCRA TSD		0.500	0	0	0	NR	NR	0
RCRA Lg. Quan. Gen.		0.250	0	0	NR	NR	NR	0
RCRA Sm. Quan. Gen.		0.250	8	6	NR	NR	NR	14
ERNS		TP	NR	NR	NR	NR	NR	0
HMIRS		TP	NR	NR	NR	NR	NR	0
US ENG CONTROLS		0.500	0	0	0	NR	NR	0
US INST CONTROL		0.500	0	0	0	NR	NR	0
DOD		1.000	0	0	0	0	NR	0
FUDS		1.000	0	0	0	0	NR	0
US BROWNFIELDS		0.500	0	0	0	NR	NR	0
CONSENT		1.000	0	0	0	0	NR	0
ROD		1.000	0	0	0	0	NR	0
UMTRA		0.500	0	0	0	NR	NR	0
ODI		0.500	0	0	0	NR	NR	0
TRIS		TP	NR	NR	NR	NR	NR	0
TSCA		TP	NR	NR	NR	NR	NR	0
FTTS		TP	NR	NR	NR	NR	NR	0
SSTS		TP	NR	NR	NR	NR	NR	0
PADS		TP	NR	NR	NR	NR	NR	0
MLTS		TP	NR	NR	NR	NR	NR	0
MINES		0.250	0	0	NR	NR	NR	0
FINDS		TP	NR	NR	NR	NR	NR	0
RAATS		TP	NR	NR	NR	NR	NR	0
STATE AND LOCAL RECORDS								
AWP		1.000	0	0	2	1	NR	3
Cal-Sites		1.000	0	0	2	1	NR	3
CA Bond Exp. Plan		1.000	0	0	0	0	NR	0
NFA		0.250	0	0	NR	NR	NR	0
NFE		0.250	0	0	NR	NR	NR	0
REF		0.250	0	0	NR	NR	NR	0
SCH		0.250	0	0	NR	NR	NR	0
Toxic Pits		1.000	0	0	0	0	NR	0
State Landfill		0.500	0	1	0	NR	NR	1
CA WDS		TP	NR	NR	NR	NR	NR	0
WMUDS/SWAT		0.500	0	0	1	NR	NR	1
Cortese		0.500	0	1	4	NR	NR	5
SWRCY		0.500	0	0	0	NR	NR	0
LUST		0.500	0	1	3	NR	NR	4
CA FID UST		0.250	6	2	NR	NR	NR	8

MAP FINDINGS SUMMARY

Database	Target Property	Search Distance (Miles)	< 1/8	1/8 - 1/4	1/4 - 1/2	1/2 - 1	> 1	Total Plotted
SLIC		0.500	0	0	3	NR	NR	3
AOCONCERN		1.000	0	0	0	0	NR	0
UST		0.250	2	1	NR	NR	NR	3
HIST UST		0.250	3	8	NR	NR	NR	11
AST		0.250	0	0	NR	NR	NR	0
SWEEPS UST		0.250	10	9	NR	NR	NR	19
CHMIRS		TP	NR	NR	NR	NR	NR	0
Notify 65		1.000	0	0	0	0	NR	0
LA Co. Site Mitigation		TP	NR	NR	NR	NR	NR	0
DEED		0.500	0	0	0	NR	NR	0
VCP		0.500	0	0	0	NR	NR	0
DRYCLEANERS		0.250	1	1	NR	NR	NR	2
Los Angeles Co. HMS		TP	NR	NR	NR	NR	NR	0
WIP		0.250	0	0	NR	NR	NR	0
CDL		TP	NR	NR	NR	NR	NR	0
HAZNET		TP	NR	NR	NR	NR	NR	0
EMI		TP	NR	NR	NR	NR	NR	0
TRIBAL RECORDS								
INDIAN RESERV		1.000	0	0	0	0	NR	0
INDIAN LUST		0.500	0	0	0	NR	NR	0
INDIAN UST		0.250	0	0	NR	NR	NR	0
EDR PROPRIETARY RECORDS								
Manufactured Gas Plants		1.000	0	0	0	0	NR	0
EDR Historical Auto Stations		0.250	0	0	NR	NR	NR	0
EDR Historical Cleaners		0.250	0	1	NR	NR	NR	1

NOTES:

TP = Target Property

NR = Not Requested at this Search Distance

Sites may be listed in more than one database

Map ID / Direction / Distance / Distance (ft.) / Elevation	Site	Database(s)	EDR ID Number / EPA ID Number
1 < 1/8 1 ft.	WALTER MILLER EXPRESS CLEANER 1835 E 41ST ST LOS ANGELES, CA 90011	RCRA-SQG FINDS CLEANERS	1000401488 CAD982009581

Relative: Lower

Actual: 207 ft.

RCRAInfo:
- Owner: NOT REQUIRED (415) 555-1212
- EPA ID: CAD982009581
- Contact: Not reported
- Classification: Small Quantity Generator
- TSDF Activities: Not reported
- Violation Status: No violations found

FINDS:
Other Pertinent Environmental Activity Identified at Site:
RESOURCE CONSERVATION AND RECOVERY ACT INFORMATION SYSTEM

CA Cleaners:

Inactive Date:	6/30/1997
EPA Id:	CAD982009581
Facility Address 2 :	Not reported
NAICS Code :	Not reported
Facility Active :	No
Mail Name :	Not reported
Mailing Address:	835 E 41ST ST LOS ANGELES, CA 90011
Owner Name :	WALTER MILLER
Mailing Address:	835 E 41ST ST LOS ANGELES, CA 90011
Owner Telephone :	2132346422
Contact Name :	WALTER MILLER
Mailing Address:	835 E 41ST ST UNDELIV V97 -PH LOS ANGELES, CA 90011
Contact Telephone :	2132346422
Region Code :	3
Create Date :	03/01/1988
SIC Description :	Not reported
NAICS Description :	Not reported

Map ID / Direction / Distance / Distance (ft.) / Elevation	Site	Database(s)	EDR ID Number / EPA ID Number
A2 < 1/8 1 ft.	UTILITY TRAILER SALES COMPANY 4101 S ALAMEDA ST LOS ANGELES, CA 90058	CA FID UST SWEEPS UST	S101586738 N/A

Site 1 of 3 in cluster A

Relative: Lower

Actual: 208 ft.

UTILITY TRAILER SALES COMPANY (Continued) S101586738

FID:

Facility ID:	19054413	Regulate ID:	Not reported
Reg By:	Inactive Underground Storage Tank Location		
Cortese Code:	Not reported	SIC Code:	Not reported
Status:	Inactive	Facility Tel:	(213) 000-0000
Mail To:	Not reported 4101 S ALAMEDA ST LOS ANGELES, CA 90058		
Contact:	Not reported	Contact Tel:	Not reported
DUNs No:	Not reported	NPDES No:	Not reported
Creation:	10/22/93	Modified:	00/00/00
EPA ID:	Not reported		
Comments:	Not reported		

SWEEPS:

Status :	Not reported
Comp Number :	5242
Number :	Not reported
Board Of Equalization :	Not reported
Ref Date :	Not reported
Act Date :	Not reported
Created Date :	Not reported
Tank Status :	Not reported
Owner Tank Id :	Not reported
Swrcb Tank Id :	Not reported
Actv Date :	Not reported
Capacity :	Not reported
Tank Use :	Not reported
Stg :	Not reported
Content :	Not reported
Number Of Tanks :	0

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3 UTILITY TRAILER CO CORP SWEEPS UST S106933959
1801 E 41ST ST N/A
< 1/8 LOS ANGELES, CA 90058
1 ft.

Relative:
Lower

Actual:
206 ft.

SWEEPS:

Status :	Not reported
Comp Number :	3671
Number :	Not reported
Board Of Equalization :	Not reported
Ref Date :	Not reported
Act Date :	Not reported
Created Date :	Not reported
Tank Status :	Not reported
Owner Tank Id :	Not reported
Swrcb Tank Id :	Not reported
Actv Date :	Not reported
Capacity :	Not reported
Tank Use :	Not reported
Stg :	Not reported
Content :	Not reported
Number Of Tanks :	0

Map ID / Direction / Distance / Distance (ft.) / Elevation	Site	Database(s)	EDR ID Number / EPA ID Number
4 < 1/8 1 ft.	ALAMEDA PAINTING CO INC 1714 E 41ST ST LOS ANGELES, CA 90058	RCRA-SQG FINDS HAZNET	1000297225 CAD981418874

Relative: Lower

Actual: 207 ft.

RCRAInfo:
- Owner: ALAMEDA PAINTING CO INC (415) 555-1212
- EPA ID: CAD981418874
- Contact: Not reported
- Classification: Small Quantity Generator
- TSDF Activities: Not reported
- Violation Status: No violations found

FINDS:
Other Pertinent Environmental Activity Identified at Site:
RESOURCE CONSERVATION AND RECOVERY ACT INFORMATION SYSTEM

HAZNET:
- Gepaid: CAD981418874
- TSD EPA ID: CAD008252405
- Gen County: Los Angeles
- Tsd County: Los Angeles
- Tons: 2.5227
- Facility Address 2: Not reported
- Waste Category: Unspecified solvent mixture Waste
- Disposal Method: Recycler
- Contact: Not reported
- Telephone: (000) 000-0000
- Mailing Name: Not reported
- Mailing Address: 1714 E 41ST ST LOS ANGELES, CA 90058
- County: Los Angeles

Map ID / Direction / Distance / Distance (ft.) / Elevation	Site	Database(s)	EDR ID Number / EPA ID Number
5 < 1/8 1 ft.	LA HARBOR DEPT 1786 E MARTIN LUTHER KING JR BLVD LOS ANGELES, CA 90058	UST	U003780092 N/A

Relative: Higher

Actual: 211 ft.

State UST:
- Facility ID: 23568
- Total Tanks: Not reported
- Region: STATE
- Local Agency: Los Angeles, Los Angeles County

Map ID / Direction / Distance / Distance (ft.) / Elevation	Site	Database(s)	EDR ID Number / EPA ID Number
A6 < 1/8 1 ft.	UTILITY TRAILORS 4073 S ALAMEDA ST LOS ANGELES, CA 90058	RCRA-SQG FINDS	1000287385 CAD981675838

Site 2 of 3 in cluster A

Relative: Lower

Actual: 207 ft.

UTILITY TRAILORS (Continued) — 1000287385

RCRAInfo:
Owner: UTILITY TRAILOR SLS
(415) 555-1212
EPA ID: CAD981675838
Contact: ENVIRONMENTAL MANAGER
(213) 233-3221
Classification: Small Quantity Generator
TSDF Activities: Not reported
Violation Status: No violations found

FINDS:
Other Pertinent Environmental Activity Identified at Site:
RESOURCE CONSERVATION AND RECOVERY ACT INFORMATION SYSTEM

---

7 — **SINGER CO. LA PERIOD FURNITURE DIVISION** — RCRA-SQG, FINDS — 1000234014, CAD072300072
1838 EAST SANTA BARBARA AVENUE
< 1/8 **LOS ANGELES, CA 90058**
1 ft.

Relative: Higher

Actual: 211 ft.

RCRAInfo:
Owner: SINGER COMPANY THE
(203) 356-4200
EPA ID: CAD072300072
Contact: ENVIRONMENTAL MANAGER
(213) 231-2111
Classification: Small Quantity Generator
TSDF Activities: Not reported
Violation Status: No violations found

FINDS:
Other Pertinent Environmental Activity Identified at Site:
RESOURCE CONSERVATION AND RECOVERY ACT INFORMATION SYSTEM

A8 — **UNIVERSAL TRUCK BODY INC** — EMI — S106841762
4073 S ALAMEDA ST — N/A
< 1/8 **LOS ANGELES, CA 90058**
1 ft.

Site 3 of 3 in cluster A

Relative: Lower

Actual: 207 ft.

EMISSIONS :

Year :	1987
Facility ID :	12137
Air District Code :	SC
SIC Code :	7538
Air Basin :	SC
Air District Name :	SOUTH COAST AQMD
Community Health Air Pollution Info System :	Not reported
Consolidated Emission Reporting Rule :	Not reported
County Code :	19
County ID :	19
Total Organic Hydrocarbon Gases Tons/Yr:	1
Reactive Organic Gases Tons/Yr:	1
Carbon Monoxide Emissions Tons/Yr:	0
NOX - Oxides of Nitrogen Tons/Yr:	0

Map ID / Direction / Distance / Distance (ft.) / Elevation	Site	Database(s)	EDR ID Number / EPA ID Number
	UNIVERSAL TRUCK BODY INC (Continued)		S106841762
	SOX - Oxides of Sulphur Tons/Yr: 0 Particulate Matter Tons/Yr : 0 Part. Matter 10 Micrometers and Smaller Tons/Yr : 0		
B9 West < 1/8 211 ft. Relative: Higher Actual: 211 ft.	OMEGA ENVIRONMENTAL SERVICES INC 1755 E MARTIN LUTHER KING JR B LOS ANGELES, CA 90058 Site 1 of 3 in cluster B RCRAInfo: Owner: OMEGA ENVIRONMENTAL SRVCS (323) 231-0780 EPA ID: CAR000093625 Contact: MICHAEL FISHER (323) 231-0780 Classification: Small Quantity Generator TSDF Activities: Not reported Violation Status: No violations found FINDS: Other Pertinent Environmental Activity Identified at Site: HAZARDOUS WASTE TRACKING SYSTEM-DATAMART RESOURCE CONSERVATION AND RECOVERY ACT INFORMATION SYSTEM	PADS RCRA-SQG FINDS	1004677136 CAR000093625
B10 West < 1/8 211 ft. Relative: Higher Actual: 211 ft.	KEN WESGARTH CONSTRUCTION 1755 E MARTIN LUTHER KING JR BLVD LOS ANGELES, CA 90058 Site 2 of 3 in cluster B State UST: Facility ID: 25009 Total Tanks: Not reported Region: STATE Local Agency: Los Angeles, Los Angeles County	UST	U003781326 N/A
B11 West < 1/8 216 ft. Relative: Higher Actual: 211 ft.	KEN WESGARTH CONSTRUCTION 1755 E MARTIN LUTHER KING J BLVD LOS ANGELES, CA 90062 Site 3 of 3 in cluster B	CA FID UST	S101588159 N/A

KEN WESGARTH CONSTRUCTION (Continued) S101588159

FID:

Facility ID:	19056395	Regulate ID:	Not reported
Reg By:	Active Underground Storage Tank Location		
Cortese Code:	Not reported	SIC Code:	Not reported
Status:	Active	Facility Tel:	(213) 000-0000
Mail To:	Not reported 1755 E MARTIN LUTHER KING J B LOS ANGELES, CA 90062		
Contact:	Not reported	Contact Tel:	Not reported
DUNs No:	Not reported	NPDES No:	Not reported
Creation:	10/22/93	Modified:	00/00/00
EPA ID:	Not reported		
Comments:	Not reported		

C12 AVON TRANSPORT HAZNET S106923005
NE 2030 ROSS ST SWEEPS UST N/A
< 1/8 VERNON, CA 90058
365 ft.

Site 1 of 2 in cluster C

Relative:
Higher

Actual:
211 ft.

HAZNET:

Gepaid:	CAL000274424
TSD EPA ID:	CAD099452708
Gen County:	Los Angeles
Tsd County:	Los Angeles
Tons:	0.16
Facility Address 2:	Not reported
Waste Category:	Waste oil and mixed oil
Disposal Method:	Recycler
Contact:	MICHAEL CHANG
Telephone:	(323) 235-0099
Mailing Name:	Not reported
Mailing Address:	2030 ROSS ST VERNON, CA 90058
County	Los Angeles

SWEEPS:

Status :	Not reported
Comp Number :	3000
Number :	Not reported
Board Of Equalization :	Not reported
Ref Date :	Not reported
Act Date :	Not reported
Created Date :	Not reported
Tank Status :	Not reported
Owner Tank Id :	Not reported
Swrcb Tank Id :	19-039-003000-003001
Actv Date :	Not reported
Capacity :	7500
Tank Use :	M.V. FUEL
Stg :	PRODUCT
Content :	DIESEL
Number Of Tanks :	3

Status :	Not reported
Comp Number :	3000
Number :	Not reported
Board Of Equalization :	Not reported
Ref Date :	Not reported

AVON TRANSPORT (Continued) S106923005

Act Date :	Not reported
Created Date :	Not reported
Tank Status :	Not reported
Owner Tank Id :	Not reported
Swrcb Tank Id :	19-039-003000-003002
Actv Date :	Not reported
Capacity :	7500
Tank Use :	M.V. FUEL
Stg :	PRODUCT
Content :	DIESEL
Number Of Tanks :	3
Status :	Not reported
Comp Number :	3000
Number :	Not reported
Board Of Equalization :	Not reported
Ref Date :	Not reported
Act Date :	Not reported
Created Date :	Not reported
Tank Status :	Not reported
Owner Tank Id :	Not reported
Swrcb Tank Id :	19-039-003000-003003
Actv Date :	Not reported
Capacity :	550
Tank Use :	OIL
Stg :	WASTE
Content :	WASTE OIL
Number Of Tanks :	Not reported

D13 EMMDI INCORPORATED CA FID UST S101587858
South 1862 E 41ST PL SWEEPS UST N/A
< 1/8 LOS ANGELES, CA 90021
375 ft.

Site 1 of 4 in cluster D

Relative: Lower

Actual: 205 ft.

FID:

Facility ID:	19056072	Regulate ID:	Not reported
Reg By:	Active Underground Storage Tank Location		
Cortese Code:	Not reported	SIC Code:	Not reported
Status:	Active	Facility Tel:	(213) 233-2866
Mail To:	Not reported 1862 E 41ST PL LOS ANGELES, CA 90021		
Contact:	Not reported	Contact Tel:	Not reported
DUNs No:	Not reported	NPDES No:	Not reported
Creation:	10/22/93	Modified:	00/00/00
EPA ID:	Not reported		
Comments:	Not reported		

SWEEPS:

Status :	Not reported
Comp Number :	5529
Number :	Not reported
Board Of Equalization :	Not reported
Ref Date :	Not reported
Act Date :	Not reported
Created Date :	Not reported
Tank Status :	Not reported
Owner Tank Id :	Not reported

EMMDI INCORPORATED (Continued) S101587858

Swrcb Tank Id : Not reported
Actv Date : Not reported
Capacity : Not reported
Tank Use : Not reported
Stg : Not reported
Content : Not reported
Number Of Tanks : 0

D14
South
< 1/8
379 ft.

Relative:
Lower

Actual:
205 ft.

CEDERGREN RETINNING CO INC
1845 E 41ST PL
LOS ANGELES, CA 90058

RCRA-SQG 1000214892
FINDS CAD008334047

Site 2 of 4 in cluster D

RCRAInfo:
Owner: DAN ARAUJO AND JANEEN ARAUJO
(415) 555-1212
EPA ID: CAD008334047

Contact: ENVIRONMENTAL MANAGER
(213) 231-4371

Classification: Small Quantity Generator
TSDF Activities: Not reported

Violation Status: No violations found

FINDS:
Other Pertinent Environmental Activity Identified at Site:
RESOURCE CONSERVATION AND RECOVERY ACT INFORMATION SYSTEM

D15
South
< 1/8
379 ft.

Relative:
Lower

Actual:
205 ft.

CEDERGREEN REFINING COMPANY
1845 E 41ST PL
LOS ANGELES, CA 90021

CA FID UST S101585745
SWEEPS UST N/A

Site 3 of 4 in cluster D

FID:

Facility ID:	19028395	Regulate ID:	Not reported
Reg By:	Active Underground Storage Tank Location		
Cortese Code:	Not reported	SIC Code:	Not reported
Status:	Active	Facility Tel:	(213) 231-4371
Mail To:	Not reported 1845 E 41ST PL LOS ANGELES, CA 90021		
Contact:	Not reported	Contact Tel:	Not reported
DUNs No:	Not reported	NPDES No:	Not reported
Creation:	10/22/93	Modified:	00/00/00
EPA ID:	Not reported		
Comments:	Not reported		

SWEEPS:
Status : Not reported
Comp Number : 5531
Number : Not reported
Board Of Equalization : Not reported
Ref Date : Not reported
Act Date : Not reported
Created Date : Not reported
Tank Status : Not reported

Map ID / Direction / Distance / Distance (ft.) / Elevation	Site	Database(s)	EDR ID Number / EPA ID Number
	CEDERGREEN REFINING COMPANY (Continued)		**S101585745**

Owner Tank Id : Not reported
Swrcb Tank Id : Not reported
Actv Date : Not reported
Capacity : Not reported
Tank Use : Not reported
Stg : Not reported
Content : Not reported
Number Of Tanks : 0

D16 / **South** / **< 1/8** / **379 ft.** / **Relative: Lower** / **Actual: 205 ft.**	**BOGUSLAVSKY BORIS** **1842 E 41ST PLACE** **LOS ANGELES, CA 90058**	**RCRA-SQG** **FINDS**	**1000427876** **CAD981978125**

Site 4 of 4 in cluster D

RCRAInfo:
Owner: NOT REQUIRED
(415) 555-1212
EPA ID: CAD981978125

Contact: Not reported

Classification: Small Quantity Generator
TSDF Activities: Not reported

Violation Status: No violations found

FINDS:
Other Pertinent Environmental Activity Identified at Site:
RESOURCE CONSERVATION AND RECOVERY ACT INFORMATION SYSTEM

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17 / **South** / **< 1/8** / **394 ft.** / **Relative: Lower** / **Actual: 205 ft.**	**UTILITY TRAILER SALES CO** **1769 E 41ST PL** **LOS ANGELES, CA 90058**	**CA FID UST** **EMI** **SWEEPS UST**	**S101587859** **N/A**

FID:

Facility ID:	19056073	Regulate ID:	Not reported
Reg By:	Active Underground Storage Tank Location		
Cortese Code:	Not reported	SIC Code:	Not reported
Status:	Active	Facility Tel:	(213) 233-3221
Mail To:	Not reported 1769 E 41ST PL LOS ANGELES, CA 90021		
Contact:	Not reported	Contact Tel:	Not reported
DUNs No:	Not reported	NPDES No:	Not reported
Creation:	10/22/93	Modified:	00/00/00
EPA ID:	Not reported		
Comments:	Not reported		

SWEEPS:
Status : Not reported
Comp Number : 5530
Number : Not reported
Board Of Equalization : Not reported
Ref Date : Not reported
Act Date : Not reported
Created Date : Not reported
Tank Status : Not reported
Owner Tank Id : Not reported

UTILITY TRAILER SALES CO (Continued) S101587859

Swrcb Tank Id : Not reported
Actv Date : Not reported
Capacity : Not reported
Tank Use : Not reported
Stg : Not reported
Content : Not reported
Number Of Tanks : 0

EMISSIONS :

Year :	1987
Facility ID :	51691
Air District Code :	SC
SIC Code :	3715
Air Basin :	SC
Air District Name :	SOUTH COAST AQMD
Community Health Air Pollution Info System :	Not reported
Consolidated Emission Reporting Rule :	Not reported
County Code :	19
County ID :	19
Total Organic Hydrocarbon Gases Tons/Yr:	3
Reactive Organic Gases Tons/Yr:	2
Carbon Monoxide Emissions Tons/Yr:	0
NOX - Oxides of Nitrogen Tons/Yr:	0
SOX - Oxides of Sulphur Tons/Yr:	0
Particulate Matter Tons/Yr :	0
Part. Matter 10 Micrometers and Smaller Tons/Yr :	0

C18 **REEDER FASTWAY TRUCKING** HIST UST U001562122
NE **2043 ROSS ST** SWEEPS UST N/A
< 1/8 **VERNON, CA 90058**
421 ft.

Site 2 of 2 in cluster C

Relative: Higher

Actual: 211 ft.

UST HIST:

Facility ID:	61043	Owner Name:	L.A. BY - PRODUCTS
Total Tanks:	1	Region:	STATE
Owner Address:	1810 E. 25TH ST. VERNON, CA 90058		
Tank Used for:	PRODUCT		
Tank Num:	1	Container Num:	#1
Tank Capacity:	00010000	Year Installed:	Not reported
Type of Fuel:	REGULAR	Tank Construction:	Not Reported
Leak Detection:	Stock Inventor		
Contact Name:	AL WHEELOCK	Telephone:	(213) 234-9101
Facility Type:	Other	Other Type:	TRUCKING
Facility ID:	29044	Owner Name:	L.A. BY-PRODUCTS
Total Tanks:	1	Region:	STATE
Owner Address:	1810 E. 25TH ST. VERNON, CA 90058		
Tank Used for:	PRODUCT		
Tank Num:	1	Container Num:	#1
Tank Capacity:	00010000	Year Installed:	Not reported
Type of Fuel:	REGULAR	Tank Construction:	Not Reported
Leak Detection:	None		
Contact Name:	AL WHEELOCK	Telephone:	(213) 234-9101
Facility Type:	Other	Other Type:	TRUCKING CO.

SWEEPS:
Status : A

REEDER FASTWAY TRUCKING (Continued) U001562122

Comp Number :	1290
Number :	1
Board Of Equalization :	44-010764
Ref Date :	12-07-93
Act Date :	12-07-93
Created Date :	05-01-84
Tank Status :	A
Owner Tank Id :	1291
Swrcb Tank Id :	19-039-001290-000001
Actv Date :	12-06-93
Capacity :	10000
Tank Use :	M.V. FUEL
Stg :	P
Content :	DIESEL
Number Of Tanks :	1

Status :	A
Comp Number :	1290
Number :	1
Board Of Equalization :	44-010764
Ref Date :	12-07-93
Act Date :	12-07-93
Created Date :	05-01-84
Tank Status :	A
Owner Tank Id :	1291
Swrcb Tank Id :	19-039-001290-000001
Actv Date :	12-06-93
Capacity :	10000
Tank Use :	M.V. FUEL
Stg :	P
Content :	DIESEL
Number Of Tanks :	1

19
East
< 1/8
465 ft.

VERNON WAREHOUSE COMPANY
2050 E 38TH ST
VERNON, CA 90058

HIST UST U001562155
SWEEPS UST N/A

Relative:
Lower

Actual:
207 ft.

UST HIST:

Facility ID:	384	Owner Name:	VERNON WAREHOUSE COMPANY
Total Tanks:	3	Region:	STATE
Owner Address:	2050 E. 38TH STREET		
	VERNON, CA 90058		
Tank Used for:	PRODUCT		
Tank Num:	1	Container Num:	DIESEL 1
Tank Capacity:	00007500	Year Installed:	Not reported
Type of Fuel:	DIESEL	Tank Construction:	Not Reported
Leak Detection:	Stock Inventor		
Contact Name:	DAVID WILSON	Telephone:	(213) 234-2200
Facility Type:	Other	Other Type:	WAREHOUSE

Facility ID:	384	Owner Name:	VERNON WAREHOUSE COMPANY
Total Tanks:	3	Region:	STATE
Owner Address:	2050 E. 38TH STREET		
	VERNON, CA 90058		
Tank Used for:	PRODUCT		
Tank Num:	2	Container Num:	DIESEL 2
Tank Capacity:	00007500	Year Installed:	Not reported
Type of Fuel:	DIESEL	Tank Construction:	Not Reported

VERNON WAREHOUSE COMPANY (Continued) U001562155

Leak Detection: Stock Inventor
Contact Name: DAVID WILSON
Facility Type: Other
Telephone: (213) 234-2200
Other Type: WAREHOUSE

Facility ID: 384
Total Tanks: 3
Owner Address: 2050 E. 38TH STREET
VERNON, CA 90058
Tank Used for: PRODUCT
Owner Name: VERNON WAREHOUSE COMPANY
Region: STATE

Tank Num: 3
Tank Capacity: 00007500
Type of Fuel: UNLEADED
Leak Detection: Stock Inventor
Contact Name: DAVID WILSON
Facility Type: Other
Container Num: GAS 1
Year Installed: Not reported
Tank Construction: Not Reported
Telephone: (213) 234-2200
Other Type: WAREHOUSE

SWEEPS:
Status : A
Comp Number : 4400
Number : 1
Board Of Equalization : 44-010872
Ref Date : 04-01-92
Act Date : 04-01-92
Created Date : 08-15-85
Tank Status : A
Owner Tank Id : 4401
Swrcb Tank Id : 19-039-004400-000001
Actv Date : 04-01-92
Capacity : 7500
Tank Use : M.V. FUEL
Stg : P
Content : REG UNLEADED
Number Of Tanks : 3

Status : A
Comp Number : 4400
Number : 1
Board Of Equalization : 44-010872
Ref Date : 04-01-92
Act Date : 04-01-92
Created Date : 08-15-85
Tank Status : A
Owner Tank Id : 4402
Swrcb Tank Id : 19-039-004400-000002
Actv Date : 04-01-92
Capacity : 7500
Tank Use : M.V. FUEL
Stg : P
Content : DIESEL
Number Of Tanks : Not reported

Status : A
Comp Number : 4400
Number : 1
Board Of Equalization : 44-010872
Ref Date : 04-01-92
Act Date : 04-01-92
Created Date : 08-15-85

VERNON WAREHOUSE COMPANY (Continued) U001562155

Tank Status : A
Owner Tank Id : 4403
Swrcb Tank Id : 19-039-004400-000003
Actv Date : 04-01-92
Capacity : 7500
Tank Use : M.V. FUEL
Stg : P
Content : DIESEL
Number Of Tanks : Not reported

Status : A
Comp Number : 4400
Number : 1
Board Of Equalization : 44-010872
Ref Date : 04-01-92
Act Date : 04-01-92
Created Date : 08-15-85
Tank Status : A
Owner Tank Id : 4401
Swrcb Tank Id : 19-039-004400-000001
Actv Date : 04-01-92
Capacity : 7500
Tank Use : M.V. FUEL
Stg : P
Content : REG UNLEADED
Number Of Tanks : 3

Status : A
Comp Number : 4400
Number : 1
Board Of Equalization : 44-010872
Ref Date : 04-01-92
Act Date : 04-01-92
Created Date : 08-15-85
Tank Status : A
Owner Tank Id : 4402
Swrcb Tank Id : 19-039-004400-000002
Actv Date : 04-01-92
Capacity : 7500
Tank Use : M.V. FUEL
Stg : P
Content : DIESEL
Number Of Tanks : Not reported

Status : A
Comp Number : 4400
Number : 1
Board Of Equalization : 44-010872
Ref Date : 04-01-92
Act Date : 04-01-92
Created Date : 08-15-85
Tank Status : A
Owner Tank Id : 4403
Swrcb Tank Id : 19-039-004400-000003
Actv Date : 04-01-92
Capacity : 7500
Tank Use : M.V. FUEL

VERNON WAREHOUSE COMPANY (Continued) U001562155

Stg : P
Content : DIESEL
Number Of Tanks : Not reported

20 LOS ANGELES BY PRODUCTS HIST UST U001562120
ENE 2065 ROSS ST SWEEPS UST N/A
< 1/8 VERNON, CA 90058
542 ft.

Relative: Higher

Actual: 211 ft.

UST HIST:

Facility ID:	3681	Owner Name:	RECORD TRANSPORT, INC.
Total Tanks:	3	Region:	STATE
Owner Address:	2065 E. ROSS STREET, V VERNON, CA 90058		
Tank Used for:	PRODUCT		
Tank Num:	1	Container Num:	01
Tank Capacity:	00010000	Year Installed:	Not reported
Type of Fuel:	REGULAR	Tank Construction:	Not Reported
Leak Detection:	Visual, Stock Inventor		
Contact Name:	Not reported	Telephone:	(213) 231-9141
Facility Type:	Other	Other Type:	TRUCKING COMPANY

Facility ID:	3681	Owner Name:	RECORD TRANSPORT, INC.
Total Tanks:	3	Region:	STATE
Owner Address:	2065 E. ROSS STREET, V VERNON, CA 90058		
Tank Used for:	PRODUCT		
Tank Num:	2	Container Num:	02
Tank Capacity:	00010000	Year Installed:	Not reported
Type of Fuel:	REGULAR	Tank Construction:	Not Reported
Leak Detection:	Visual, Stock Inventor		
Contact Name:	Not reported	Telephone:	(213) 231-9141
Facility Type:	Other	Other Type:	TRUCKING COMPANY

Facility ID:	3681	Owner Name:	RECORD TRANSPORT, INC.
Total Tanks:	3	Region:	STATE
Owner Address:	2065 E. ROSS STREET, V VERNON, CA 90058		
Tank Used for:	WASTE		
Tank Num:	3	Container Num:	03
Tank Capacity:	00000000	Year Installed:	Not reported
Type of Fuel:	WASTE OIL	Tank Construction:	Not Reported
Leak Detection:	Visual		
Contact Name:	Not reported	Telephone:	(213) 231-9141
Facility Type:	Other	Other Type:	TRUCKING COMPANY

SWEEPS:

Status :	A
Comp Number :	1270
Number :	1
Board Of Equalization :	44-010782
Ref Date :	06-09-93
Act Date :	06-09-93
Created Date :	05-01-84
Tank Status :	A
Owner Tank Id :	1271
Swrcb Tank Id :	19-039-001270-000001
Actv Date :	10-28-91
Capacity :	10000

LOS ANGELES BY PRODUCTS (Continued) U001562120

Tank Use : M.V. FUEL
Stg : P
Content : REG UNLEADED
Number Of Tanks : 1

Status : A
Comp Number : 1270
Number : 1
Board Of Equalization : 44-010762
Ref Date : 06-09-93
Act Date : 06-09-93
Created Date : 05-01-84
Tank Status : A
Owner Tank Id : 12/1
Swrcb Tank Id : 19-039-001270-000001
Actv Date : 10-28-91
Capacity : 10000
Tank Use : M.V. FUEL
Stg : P
Content : REG UNLEADED
Number Of Tanks : 1

21
WNW
< 1/8
575 ft.

OLIN CORP OLIN WATER SERVICES
3312 E LONG BEACH AVE
LOS ANGELES, CA 90058

RCRA-SQG 1000304665
FINDS CAD076206507
CA FID UST
SWEEPS UST

Relative:
Higher

Actual:
212 ft.

RCRAInfo:
Owner: OLIN WATER SERVICES OLIN CORPORATION
(213) 232-3301
EPA ID: CAD076206507

Contact: Not reported

Classification: Small Quantity Generator
TSDF Activities: Not reported

Violation Status: No violations found

FINDS:
Other Pertinent Environmental Activity Identified at Site:
RESOURCE CONSERVATION AND RECOVERY ACT INFORMATION SYSTEM

FID:

Facility ID:	19029870	Regulate ID:	Not reported
Reg By:	Active Underground Storage Tank Location		
Cortese Code:	Not reported	SIC Code:	Not reported
Status:	Active	Facility Tel:	(213) 000-0000
Mail To:	Not reported 3312 LONG BEACH AVE LOS ANGELES, CA 90058		
Contact:	Not reported	Contact Tel:	Not reported
DUNs No:	Not reported	NPDES No:	Not reported
Creation:	10/22/93	Modified:	00/00/00
EPA ID:	Not reported		
Comments:	Not reported		

SWEEPS:
Status : Not reported
Comp Number : 5235
Number : Not reported

OLIN CORP OLIN WATER SERVICES (Continued) 1000304665

Board Of Equalization :	Not reported
Ref Date :	Not reported
Act Date :	Not reported
Created Date :	Not reported
Tank Status :	Not reported
Owner Tank Id :	Not reported
Swrcb Tank Id :	Not reported
Actv Date :	Not reported
Capacity :	Not reported
Tank Use :	Not reported
Stg :	Not reported
Content :	Not reported
Number Of Tanks :	0

Status :	Not reported
Comp Number :	5235
Number :	Not reported
Board Of Equalization :	Not reported
Ref Date :	Not reported
Act Date :	Not reported
Created Date :	Not reported
Tank Status :	Not reported
Owner Tank Id :	Not reported
Swrcb Tank Id :	Not reported
Actv Date :	Not reported
Capacity :	Not reported
Tank Use :	Not reported
Stg :	Not reported
Content :	Not reported
Number Of Tanks :	Not reported

E22
South
1/8-1/4
746 ft.

Relative:
Lower

Actual:
203 ft.

WEST COAST BULLETS RCRA-SQG 1000391664
1871 E 42ND ST FINDS CAD982491854
LOS ANGELES, CA 90058

Site 1 of 2 in cluster E

RCRAInfo:
Owner: GERTZ DAVID
(415) 555-1212
EPA ID: CAD982491854

Contact: ENVIRONMENTAL MANAGER
(213) 234-0289

Classification: Small Quantity Generator
TSDF Activities: Not reported

Violation Status: No violations found

FINDS:
Other Pertinent Environmental Activity Identified at Site:
RESOURCE CONSERVATION AND RECOVERY ACT INFORMATION SYSTEM

Map ID / Direction / Distance / Distance (ft.) / Elevation	Site	Database(s)	EDR ID Number / EPA ID Number
E23 South 1/8-1/4 750 ft. Relative: Lower Actual: 203 ft.	SOUTHLAND METALS 1850 E 42ND ST LOS ANGELES, CA 90011 Site 2 of 2 in cluster E	CA FID UST SWEEPS UST	S101588066 N/A

FID:

Facility ID:	19056299	Regulate ID:	Not reported
Reg By:	Active Underground Storage Tank Location		
Cortese Code:	Not reported	SIC Code:	Not reported
Status:	Active	Facility Tel:	(213) 000-0000
Mail To:	Not reported 1850 E 42ND ST LOS ANGELES, CA 90011		
Contact:	Not reported	Contact Tel:	Not reported
DUNs No:	Not reported	NPDES No:	Not reported
Creation:	10/22/93	Modified:	00/00/00
EPA ID:	Not reported		
Comments:	Not reported		

SWEEPS:

Status :	Not reported
Comp Number :	6652
Number :	Not reported
Board Of Equalization :	Not reported
Ref Date :	Not reported
Act Date :	Not reported
Created Date :	Not reported
Tank Status :	Not reported
Owner Tank Id :	Not reported
Swrcb Tank Id :	Not reported
Actv Date :	Not reported
Capacity :	Not reported
Tank Use :	Not reported
Stg :	Not reported
Content :	Not reported
Number Of Tanks :	0

Map ID / Direction / Distance / Distance (ft.) / Elevation	Site	Database(s)	EDR ID Number / EPA ID Number
F24 ENE 1/8-1/4 754 ft. Relative: Higher Actual: 210 ft.	CRESCENT TRUCK LINES 2910 ROSS ST VERNON, CA 90058 Site 1 of 3 in cluster F	LUST Cortese CA WDS SWEEPS UST	S105032943 N/A

State LUST:

Cross Street:	ALAMEDA		
Qty Leaked:	Not reported		
Case Number	Not reported		
Reg Board:	4		
Chemical:	Gasoline		
Lead Agency:	Local Agency		
Local Agency :	19039		
Case Type:	Soil only		
Status:	Case Closed		
Abate Method:	Excavate and Dispose - remove contaminated soil and dispose in approved site		
Review Date:	Not reported	Confirm Leak:	Not reported
Workplan:	Not reported	Prelim Assess:	Not reported
Pollution Char:	Not reported	Remed Plan:	Not reported
Remed Action:	Not reported		
Monitoring:	Not reported		

CRESCENT TRUCK LINES (Continued) S105032943

Close Date: 1989-02-06 00:00:00
Release Date: Not reported
Cleanup Fund Id : Not reported
Discover Date : Not reported
Enforcement Dt : Not reported
Enf Type: Not reported
Enter Date : Not reported
Funding: Not reported
Staff Initials: UNK
How Discovered: Subsurface Monitoring
How Stopped: Not reported
Interim : Not reported
Leak Cause: Corrosion
Leak Source: Piping
MTBE Date : Not reported
Max MTBE GW : Not reported
MTBE Tested: Site NOT Tested for MTBE.Includes Unknown and Not Analyzed.
Priority: Not reported
Local Case # : Not reported
Beneficial: Not reported
Staff : UNK
GW Qualifier : Not reported
Max MTBE Soil : Not reported
Soil Qualifier : Not reported
Hydr Basin #: SAN FERNANDO VALLEY
Operator : SAME
Oversight Prgm: LUST
Review Date : 1989-02-06 00:00:00
Stop Date : Not reported
Work Suspended :Not reported
Responsible PartyCRESCENT TRUCK LINES
RP Address: 2910 ROSS ST, VERNON, CA 90058
Global Id: T0603700056
Org Name: Not reported
Contact Person: Not reported
MTBE Conc: 0
Mtbe Fuel: 1
Water System Name: Not reported
Well Name: Not reported
Distance To Lust: 0
Waste Discharge Global ID: Not reported
Waste Disch Assigned Name: Not reported
Summary : 08-26-91 NEW LEAK REPORT THIS REPORT IS A FOLLOW-UP TO RELEASE REPORT DATED 02-01-89 REMEDIATION WAS COMPLETED 06-20-89.

LUST Region 4:
Report Date: 2/1/1989
Lead Agency: Local Agency
Local Agency: 19039
Substance: Gasoline
Case Type: Soil
Status: Case Closed
Region: 4
Staff: UNK
Date Case Last Changed on Database: 2/6/1989
Date Leak Record Entered: Not reported
Historical Max MTBE Date: Not reported

CRESCENT TRUCK LINES (Continued) **S105032943**

GW Qualifier:	Not reported
Soil Qualifier:	Not reported
Hist Max MTBE Conc In Groundwater:	Not reported
Hist Max MTBE Conc in Soil :	Not reported
County:	Los Angeles
Organization :	Not reported
Regional Board:	04
Owner Contact:	Not reported
Responsible Party:	CRESCENT TRUCK LINES
RP Address:	2910 ROSS ST, VERNON, CA 90058
Significant Interim Remedial Action Taken:	Not reported
Program :	LUST
Lat / Long :	34.0105078 / -1
Local Agency Staff:	UNK
Beneficial Use :	Not reported
Priority :	Not reported
Cleanup Fund Id :	Not reported
Suspended :	Not reported
Local Case No :	Not reported
Substance Quantity :	Not reported
Abatement Method Used at the Site:	Excavate and Dispose
Operator :	SAME
Water System :	Not reported
Well Name :	Not reported
Approx. Dist To Production Well (ft) :	3006.4076866474185950780246962
Assigned Name :	Not reported
W Global ID :	Not reported
Source of Cleanup Funding:	Not reported
Date the Leak was Discovered:	1/31/1989
How the Leak was Discovered:	Subsurface Monitoring
How the Leak was Stopped:	Not reported
Cause of Leak:	Corrosion
Leak Source:	Piping
Date The Leak was Stopped:	1/31/1989
Date Confirmation Leak Began:	Not reported
Preliminary Site Assessment Workplan Submitted:	Not reported
Preliminary Site Assessment Began:	Not reported
Pollution Characterization Began:	Not reported
Remediation Plan Submitted:	Not reported
Remedial Action Underway:	Not reported
Post Remedial Action Monitoring Began:	Not reported
Date the Case was Closed:	2/6/1989
Enforcement Action Date:	Not reported
Date Leak First Reported:	2/1/1989
Enforcement Type:	Not reported
Global ID :	T0603700056
Cross Street:	ALAMEDA
Summary :	08-26-91 NEW LEAK REPORT THIS REPORT IS A FOLLOW-UP TO RELEASE REPORT DATED 02-01-89 REMEDIATION WAS COMPLETED 06-20-89.

CORTESE:

Region:	CORTESE
Fac Address 2:	2910 ROSS ST

WDS:

Facility ID:	4 191012587		
Facility Contact	Pete Thompson	Facility Telephone	(323) 233-2178
SIC Code:	4231	SIC Code 2:	Not reported

CRESCENT TRUCK LINES (Continued) S105032943

Agency Name: MATHENSON FAST FREIGHT
Agency Address: Not reported
Agency Contact: Not reported Agency Phone: Not reported
Design Flow: Not reported Baseline Flow: Not reported
Facility Type: Other - Does not fall into the category of Municipal/Domestic, Industrial, Agricultural or Solid Waste (Class I, II or III)
Facility Status: Active - Any facility with a continuous or seasonal discharge that is under Waste Discharge Requirements.
Agency Type: Private
Waste Type: Stormwater Runoff - Nonhazardous Solid Wastes/Influent or Solid Wastes that contain nonhazardous putrescible and non putrescible solid, semisolid, and liquid wastes (E.G., garbage, trash, refuse, paper, demolition and construction wastes, manure, vegetable or animal solid and semisolid waste).
Threat to Water: Minor Threat to Water Quality. A violation of a regional board order should cause a relatively minor impairment of beneficial uses compared to a major or minor threat. Not: All nurds without a TTWQ will be considered a minor threat to water quality unless coded at a higher Level. A Zero (0) may be used to code those NURDS that are found to represent no threat to water quality.
Complexity: Category C - Facilities having no waste treatment systems, such as cooling water dischargers or thosewho must comply through best management practices, facilities with passive waste treatment and disposal systems, such as septic systems with subsurface disposal, or dischargers having waste storage systems with land disposal such as dairy waste ponds.
Reclamation: No reclamation requirements associated with this facility.
POTW: The facility is not a POTW.
NPDES Number: CAS000001 The 1st 2 characters designate the state. The remaining 7 are assigned by the Regional Board
Subregion: 4

SWEEPS:
Status : A
Comp Number : 1320
Number : 1
Board Of Equalization : Not reported
Ref Date : 02-15-94
Act Date : 02-15-94
Created Date : 05-01-84
Tank Status : A
Owner Tank Id : 1323
Swrcb Tank Id : 19-039-001320-000003
Actv Date : 10-30-91
Capacity : 12000
Tank Use : M.V. FUEL
Stg : P
Content : DIESEL
Number Of Tanks : 1

Status : A
Comp Number : 1320
Number : 1
Board Of Equalization : Not reported
Ref Date : 02-15-94
Act Date : 02-15-94
Created Date : 05-01-84
Tank Status : A
Owner Tank Id : 1323
Swrcb Tank Id : 19-039-001320-000003
Actv Date : 10-30-91

CRESCENT TRUCK LINES (Continued) **S105032943**

Capacity :	12000
Tank Use :	M.V. FUEL
Stg :	P
Content :	DIESEL
Number Of Tanks :	1
Status :	Not reported
Comp Number :	1320
Number :	Not reported
Board Of Equalization :	Not reported
Ref Date :	Not reported
Act Date :	Not reported
Created Date :	Not reported
Tank Status :	Not reported
Owner Tank Id :	Not reported
Swrcb Tank Id :	19-039-001320-000001
Actv Date :	Not reported
Capacity :	10000
Tank Use :	M.V. FUEL
Stg :	PRODUCT
Content :	LEADED
Number Of Tanks :	2
Status :	Not reported
Comp Number :	1320
Number :	Not reported
Board Of Equalization :	Not reported
Ref Date :	Not reported
Act Date :	Not reported
Created Date :	Not reported
Tank Status :	Not reported
Owner Tank Id :	Not reported
Swrcb Tank Id :	19-039-001320-000002
Actv Date :	Not reported
Capacity :	10000
Tank Use :	M.V. FUEL
Stg :	PRODUCT
Content :	DIESEL
Number Of Tanks :	Not reported

F25 **CRESCENT TRUCK LINES (TRUCKING** HIST UST U001562052
ENE **2910 ROSS ST** N/A
1/8-1/4 **VERNON, CA 90058**
754 ft.

Site 2 of 3 in cluster F

Relative:
Higher

Actual:
210 ft.

UST HIST:

Facility ID:	6595	Owner Name:	CONROCK PROPERTY DEVELOPMENT C
Total Tanks:	2	Region:	STATE
Owner Address:	3200 SAN FERNANDO ROAD LOS ANGELES, CA 90065		
Tank Used for:	PRODUCT		
Tank Num:	1	Container Num:	1
Tank Capacity:	00010000	Year Installed:	Not reported
Type of Fuel:	DIESEL	Tank Construction:	Not Reported
Leak Detection:	Stock Inventor		
Contact Name:	MR. GEORGE WARN	Telephone:	(213) 234-6216
Facility Type:	Other	Other Type:	TRUCKING TERMINAL

CRESCENT TRUCK LINES (TRUCKING (Continued) U001562052

Facility ID:	6595	Owner Name:	CONROCK PROPERTY DEVELOPMENT C
Total Tanks:	2	Region:	STATE
Owner Address:	3200 SAN FERNANDO ROAD		
	LOS ANGELES, CA 90065		
Tank Used for:	PRODUCT		
Tank Num:	2	Container Num:	2
Tank Capacity:	00010000	Year Installed:	Not reported
Type of Fuel:	REGULAR	Tank Construction:	Not Reported
Leak Detection:	Stock Inventor		
Contact Name:	MR. GEORGE WARN	Telephone:	(213) 234-6216
Facility Type:	Other	Other Type:	TRUCKING TERMINAL

F26
ENE
1/8-1/4
762 ft.

T C I LEASING
2920 ROSS ST
VERNON, CA 90058

HAZNET S103650043
SWEEPS UST N/A

Site 3 of 3 in cluster F

Relative:
Higher

Actual:
210 ft.

HAZNET:

Gepaid:	CAC001218832
TSD EPA ID:	CAD099452708
Gen County:	Los Angeles
Tsd County:	Los Angeles
Tons:	5.0040
Facility Address 2:	Not reported
Waste Category:	Tank bottom waste
Disposal Method:	Recycler
Contact:	LA BY-PRODUCTS CO
Telephone:	(213) 233-4175
Mailing Name:	Not reported
Mailing Address:	1810 E 25TH ST
	LOS ANGELES, CA 90058
County	Los Angeles

Gepaid:	CAC001218832
TSD EPA ID:	NVT330010000
Gen County:	Los Angeles
Tsd County:	99
Tons:	93.9500
Facility Address 2:	Not reported
Waste Category:	Contaminated soil from site clean-ups
Disposal Method:	Not reported
Contact:	LA BY-PRODUCTS CO
Telephone:	(213) 233-4175
Mailing Name:	Not reported
Mailing Address:	1810 E 25TH ST
	LOS ANGELES, CA 90058
County	Los Angeles

Gepaid:	CAC001218832
TSD EPA ID:	NVT330010000
Gen County:	Los Angeles
Tsd County:	99
Tons:	12.7600
Facility Address 2:	Not reported
Waste Category:	Other inorganic solid waste
Disposal Method:	Not reported
Contact:	LA BY-PRODUCTS CO
Telephone:	(213) 233-4175

T C I LEASING (Continued) S103650043

Mailing Name: Not reported
Mailing Address: 1810 E 25TH ST
LOS ANGELES, CA 90058
County Los Angeles

SWEEPS:
Status : A
Comp Number : 1280
Number : 1
Board Of Equalization : 44-010763
Ref Date : 10-24-91
Act Date : 10-24-91
Created Date : 05-01-84
Tank Status : A
Owner Tank Id : 1281
Swrcb Tank Id : 19-039-001280-000001
Actv Date : 10-28-91
Capacity : 10000
Tank Use : M.V. FUEL
Stg : P
Content : DIESEL
Number Of Tanks : 5

Status : A
Comp Number : 1280
Number : 1
Board Of Equalization : 44-010763
Ref Date : 10-24-91
Act Date : 10-24-91
Created Date : 05-01-84
Tank Status : A
Owner Tank Id : 1282
Swrcb Tank Id : 19-039-001280-000002
Actv Date : 10-28-91
Capacity : 10000
Tank Use : M.V. FUEL
Stg : P
Content : DIESEL
Number Of Tanks : Not reported

Status : A
Comp Number : 1280
Number : 1
Board Of Equalization : 44-010763
Ref Date : 10-24-91
Act Date : 10-24-91
Created Date : 05-01-84
Tank Status : A
Owner Tank Id : 1283
Swrcb Tank Id : 19-039-001280-000003
Actv Date : 10-28-91
Capacity : 10000
Tank Use : M.V. FUEL
Stg : P
Content : DIESEL
Number Of Tanks : Not reported

Status : A

T C I LEASING (Continued) S103650043

Comp Number : 1280
Number : 1
Board Of Equalization : 44-010763
Ref Date : 10-24-91
Act Date : 10-24-91
Created Date : 05-01-84
Tank Status : A
Owner Tank Id : 1284
Swrcb Tank Id : 19-039-001280-000004
Actv Date : 10-28-91
Capacity : 5000
Tank Use : OIL
Stg : P
Content : MOTOR OIL
Number Of Tanks : Not reported

Status : A
Comp Number : 1280
Number : 1
Board Of Equalization : 44-010763
Ref Date : 10-24-91
Act Date : 10-24-91
Created Date : 05-01-84
Tank Status : A
Owner Tank Id : 1285
Swrcb Tank Id : 19-039-001280-000005
Actv Date : 10-28-91
Capacity : 1000
Tank Use : OIL
Stg : W
Content : WASTE OIL
Number Of Tanks : Not reported

Status : A
Comp Number : 1280
Number : 1
Board Of Equalization : 44-010763
Ref Date : 10-24-91
Act Date : 10-24-91
Created Date : 05-01-84
Tank Status : A
Owner Tank Id : 1281
Swrcb Tank Id : 19-039-001280-000001
Actv Date : 10-28-91
Capacity : 10000
Tank Use : M.V. FUEL
Stg : P
Content : DIESEL
Number Of Tanks : 5

Status : A
Comp Number : 1280
Number : 1
Board Of Equalization : 44-010763
Ref Date : 10-24-91
Act Date : 10-24-91
Created Date : 05-01-84

T C I LEASING (Continued) S103650043

Tank Status : A
Owner Tank Id : 1282
Swrcb Tank Id : 19-039-001280-000002
Actv Date : 10-28-91
Capacity : 10000
Tank Use : M.V. FUEL
Stg : P
Content : DIESEL
Number Of Tanks : Not reported

Status : A
Comp Number : 1280
Number : 1
Board Of Equalization : 44-010763
Ref Date : 10-24-91
Act Date : 10-24-91
Created Date : 05-01-84
Tank Status : A
Owner Tank Id : 1283
Swrcb Tank Id : 19-039-001280-000003
Actv Date : 10-28-91
Capacity : 10000
Tank Use : M.V. FUEL
Stg : P
Content : DIESEL
Number Of Tanks : Not reported

Status : A
Comp Number : 1280
Number : 1
Board Of Equalization : 44-010763
Ref Date : 10-24-91
Act Date : 10-24-91
Created Date : 05-01-84
Tank Status : A
Owner Tank Id : 1284
Swrcb Tank Id : 19-039-001280-000004
Actv Date : 10-28-91
Capacity : 5000
Tank Use : OIL
Stg : P
Content : MOTOR OIL
Number Of Tanks : Not reported

Status : A
Comp Number : 1280
Number : 1
Board Of Equalization : 44-010763
Ref Date : 10-24-91
Act Date : 10-24-91
Created Date : 05-01-84
Tank Status : A
Owner Tank Id : 1285
Swrcb Tank Id : 19-039-001280-000005
Actv Date : 10-28-91
Capacity : 1000
Tank Use : OIL

Map ID / Direction / Distance / Distance (ft.) / Elevation	Site	Database(s)	EDR ID Number / EPA ID Number
	T C I LEASING (Continued)		S103650043
	Stg : W Content : WASTE OIL Number Of Tanks : Not reported		
27 East 1/8-1/4 817 ft. Relative: Lower Actual: 207 ft.	**SHEFFIELD FURNITURE CORP.** **2100 E 38TH ST** **VERNON, CA 90058**	**HAZNET** **HIST UST** **SWEEPS UST**	**U001562130** **N/A**
	HAZNET: Gepaid: CAL000256453 TSD EPA ID: Not reported Gen County: Los Angeles Tsd County: Los Angeles Tons: 3.81 Facility Address 2: Not reported Waste Category: Oxygenated solvents (acetone, butanol, ethyl acetate, etc.) Disposal Method: Recycler Contact: DEBBIE RODRIGUEZ Telephone: (323) 588-1281 Mailing Name: Not reported Mailing Address: 2100 E 38TH ST VERNON, CA 90058 County Not reported		
	Gepaid: CAL000256453 TSD EPA ID: Not reported Gen County: Los Angeles Tsd County: Los Angeles Tons: 1.04 Facility Address 2: Not reported Waste Category: Waste oil and mixed oil Disposal Method: Recycler Contact: DEBBIE RODRIGUEZ Telephone: (323) 588-1281 Mailing Name: Not reported Mailing Address: 2100 E 38TH ST VERNON, CA 90058 County Not reported		
	Gepaid: CAL000256453 TSD EPA ID: Not reported Gen County: Los Angeles Tsd County: Los Angeles Tons: 0.15 Facility Address 2: Not reported Waste Category: Off-specification, aged, or surplus organics Disposal Method: Transfer Station Contact: DEBBIE RODRIGUEZ Telephone: (323) 588-1281 Mailing Name: Not reported Mailing Address: 2100 E 38TH ST VERNON, CA 90058 County Not reported		

SHEFFIELD FURNITURE CORP. (Continued) U001562130

Gepaid: CAL000256453
TSD EPA ID: Not reported
Gen County: Los Angeles
Tsd County: Los Angeles
Tons: 0.01
Facility Address 2: Not reported
Waste Category: Off-specification, aged, or surplus organics
Disposal Method: Recycler
Contact: DEBBIE RODRIGUEZ
Telephone: (323) 588-1281
Mailing Name: Not reported
Mailing Address: 2100 E 38TH ST
VERNON, CA 90058
County Not reported

Gepaid: CAL000256453
TSD EPA ID: Not reported
Gen County: Los Angeles
Tsd County: Los Angeles
Tons: 0.25
Facility Address 2: Not reported
Waste Category: Empty containers less than 30 gallons
Disposal Method: Transfer Station
Contact: DEBBIE RODRIGUEZ
Telephone: (323) 588-1281
Mailing Name: Not reported
Mailing Address: 2100 E 38TH ST
VERNON, CA 90058
County Not reported

Click this hyperlink while viewing on your computer to access
4 additional CA HAZNET record(s) in the EDR Site Report.

UST HIST:

Facility ID: 3776
Total Tanks: 2
Owner Address: 3800 ROSS STREET
VERNON, CA 90058
Tank Used for: PRODUCT
Tank Num: 1
Tank Capacity: 00010000
Type of Fuel: REGULAR
Leak Detection: None
Contact Name: ERNEST E. WARSAW
Facility Type: Other
Owner Name: THIRTY-EIGHTH STREET PARTNERSH
Region: STATE
Container Num: ULG806510
Year Installed: 1977
Tank Construction: 1/4 inches
Telephone: (213) 232-4161
Other Type: MANUFACTURING

Facility ID: 3776
Total Tanks: 2
Owner Address: 3800 ROSS STREET
VERNON, CA 90058
Tank Used for: PRODUCT
Tank Num: 2
Tank Capacity: 00010000
Type of Fuel: UNLEADED
Leak Detection: None
Contact Name: ERNEST E. WARSAW
Facility Type: Other
Owner Name: THIRTY-EIGHTH STREET PARTNERSH
Region: STATE
Container Num: ULG806511
Year Installed: 1977
Tank Construction: 1/4 inches
Telephone: (213) 232-4161
Other Type: MANUFACTURING

SHEFFIELD FURNITURE CORP. (Continued) U001562130

SWEEPS:

Status :	A
Comp Number :	3020
Number :	1
Board Of Equalization :	44-010816
Ref Date :	11-04-92
Act Date :	11-04-92
Created Date :	10-30-84
Tank Status :	A
Owner Tank Id :	3021
Swrcb Tank Id :	19-039-003020-003021
Actv Date :	12-26-91
Capacity :	10000
Tank Use :	M.V. FUEL
Stg :	P
Content :	LEADED
Number Of Tanks :	2

Status :	A
Comp Number :	3020
Number :	1
Board Of Equalization :	44-010816
Ref Date :	11-04-92
Act Date :	11-04-92
Created Date :	10-30-84
Tank Status :	A
Owner Tank Id :	3022
Swrcb Tank Id :	19-039-003020-003022
Actv Date :	12-26-91
Capacity :	10000
Tank Use :	M.V. FUEL
Stg :	P
Content :	LEADED
Number Of Tanks :	Not reported

Status :	A
Comp Number :	3020
Number :	1
Board Of Equalization :	44-010816
Ref Date :	11-04-92
Act Date :	11-04-92
Created Date :	10-30-84
Tank Status :	A
Owner Tank Id :	3021
Swrcb Tank Id :	19-039-003020-003021
Actv Date :	12-26-91
Capacity :	10000
Tank Use :	M.V. FUEL
Stg :	P
Content :	LEADED
Number Of Tanks :	2

Status :	A
Comp Number :	3020
Number :	1
Board Of Equalization :	44-010816
Ref Date :	11-04-92

SHEFFIELD FURNITURE CORP. (Continued) U001562130

Act Date :	11-04-92
Created Date :	10-30-84
Tank Status :	A
Owner Tank Id :	3022
Swrcb Tank Id :	19-039-003020-003022
Actv Date :	12-26-91
Capacity :	10000
Tank Use :	M.V. FUEL
Stg :	P
Content :	LEADED
Number Of Tanks :	Not reported

G28 BILL'S TRUCKING INC HIST UST U001562037
East 3575 ROSS ST N/A
1/8-1/4 LOS ANGELES, CA 90058
823 ft.

Site 1 of 3 in cluster G

Relative: Higher

Actual: 209 ft.

UST HIST:

Facility ID:	4034	Owner Name:	LOS ANGELES BY-PRODUCTS
Total Tanks:	2	Region:	STATE
Owner Address:	1810 EAST 25TH ST LOS ANGELES, CA 90058		
Tank Used for:	PRODUCT		
Tank Num:	1	Container Num:	1
Tank Capacity:	00010000	Year Installed:	Not reported
Type of Fuel:	DIESEL	Tank Construction:	Not Reported
Leak Detection:	None		
Contact Name:	CHARLES MARTINEZ TERM MGR.	Telephone:	(213) 233-1640
Facility Type:	Other	Other Type:	TRUCKING CO
Facility ID:	4034	Owner Name:	LOS ANGELES BY-PRODUCTS
Total Tanks:	2	Region:	STATE
Owner Address:	1810 EAST 25TH ST LOS ANGELES, CA 90058		
Tank Used for:	PRODUCT		
Tank Num:	2	Container Num:	2
Tank Capacity:	00010000	Year Installed:	Not reported
Type of Fuel:	DIESEL	Tank Construction:	Not Reported
Leak Detection:	None		
Contact Name:	CHARLES MARTINEZ TERM MGR.	Telephone:	(213) 233-1640
Facility Type:	Other	Other Type:	TRUCKING CO

G29 VECTA TRANSPORTATION SYSTEM HAZNET S103655167
East 3575 ROSS ST CA WDS N/A
1/8-1/4 VERNON, CA 90058 SWEEPS UST
823 ft.

Site 2 of 3 in cluster G

Relative: Higher

Actual: 209 ft.

HAZNET:

Gepaid:	CAL000105093
TSD EPA ID:	CAT000613893
Gen County:	Los Angeles
Tsd County:	Los Angeles
Tons:	0.0625
Facility Address 2:	Not reported
Waste Category:	Aqueous solution with less than 10% total organic residues
Disposal Method:	Transfer Station

VECTA TRANSPORTATION SYSTEM (Continued) S103655167

Contact: ROGER HEIT/EXT 512
Telephone: (800) 283-4445
Mailing Name: Not reported
Mailing Address: 3575 ROSS ST
VERNON, CA 90058
County Los Angeles

Gepaid: CAL000105093
TSD EPA ID: CAT000613935
Gen County: Los Angeles
Tsd County: Los Angeles
Tons: 0.0834
Facility Address 2: Not reported
Waste Category: Aqueous solution with less than 10% total organic residues
Disposal Method: Transfer Station
Contact: ROGER HEIT/EXT 512
Telephone: (800) 283-4445
Mailing Name: Not reported
Mailing Address: 3575 ROSS ST
VERNON, CA 90058
County Los Angeles

Gepaid: CAC002563025
TSD EPA ID: CAD050806850
Gen County: Los Angeles
Tsd County: Los Angeles
Tons: 0.9
Facility Address 2: Not reported
Waste Category: Other organic solids
Disposal Method: Transfer Station
Contact: DENNIS HOSELTON/OPERATION MGR
Telephone: (323) 235-4445
Mailing Name: Not reported
Mailing Address: 3575 ROSS ST
VERNON, CA 90058
County Los Angeles

Gepaid: CAC002563025
TSD EPA ID: CAT080013352
Gen County: Los Angeles
Tsd County: Los Angeles
Tons: 1.25
Facility Address 2: Not reported
Waste Category: Off-specification, aged, or surplus organics
Disposal Method: Recycler
Contact: DENNIS HOSELTON/OPERATION MGR
Telephone: (323) 235-4445
Mailing Name: Not reported
Mailing Address: 3575 ROSS ST
VERNON, CA 90058
County Los Angeles

VECTA TRANSPORTATION SYSTEM (Continued) S103655167

Gepaid: CAL000105093
TSD EPA ID: CAL000161743
Gen County: Los Angeles
Tsd County: Santa Clara
Tons: .2085
Facility Address 2: Not reported
Waste Category: Aqueous solution with 10% or more total organic residues
Disposal Method: Transfer Station
Contact: ROGER HEIT/EXT 512
Telephone: (800) 283-4445
Mailing Name: Not reported
Mailing Address: 3575 ROSS ST
VERNON, CA 90058
County Los Angeles

WDS:
Facility ID: 4 191015027
Facility Contact DENNIS HOSELTON Facility Telephone (510) 436-4445
SIC Code: Not reported SIC Code 2: Not reported
Agency Name: HEITZ TRUCKING INC
Agency Address: PO Box 6607
Oakland 94603 - 0607
Agency Contact: ROGER L HEITZ Agency Phone: (510) 436-4445
Design Flow: Not reported Baseline Flow: Not reported
Facility Type: Industrial - Facility that treats and/or disposes of liquid or semisolid wastes from any servicing, producing, manufacturing or processing operation of whatever nature, including mining, gravel washing, geothermal operations, air conditioning, ship building and repairing, oil production, storage and disposal operations, water pumping.
Facility Status: Active - Any facility with a continuous or seasonal discharge that is under Waste Discharge Requirements.
Agency Type: 7
Waste Type: Not reported
Threat to Water: Minor Threat to Water Quality. A violation of a regional board order should cause a relatively minor impairment of beneficial uses compared to a major or minor threat. Not: All nurds without a TTWQ will be considered a minor threat to water quality unless coded at a higher Level. A Zero (0) may be used to code those NURDS that are found to represent no threat to water quality.
Complexity: Category C - Facilities having no waste treatment systems, such as cooling water dischargers or thosewho must comply through best management practices, facilities with passive waste treatment and disposal systems, such as septic systems with subsurface disposal, or dischargers having waste storage systems with land disposal such as dairy waste ponds.
Reclamation: Not reported
POTW: Not reported
NPDES Number: CAS000001 The 1st 2 characters designate the state. The remaining 7 are assigned by the Regional Board
Subregion: 4

SWEEPS:
Status : A
Comp Number : 3010
Number : 1
Board Of Equalization : Not reported
Ref Date : 07-29-93
Act Date : 07-29-93
Created Date : 10-30-84
Tank Status : A
Owner Tank Id : 3013

VECTA TRANSPORTATION SYSTEM (Continued) S103655167

Swrcb Tank Id :	19-039-003010-000003
Actv Date :	12-30-91
Capacity :	8000
Tank Use :	M.V. FUEL
Stg :	P
Content :	DIESEL
Number Of Tanks :	1
Status :	A
Comp Number :	3010
Number :	1
Board Of Equalization :	Not reported
Ref Date :	07-29-93
Act Date :	07-29-93
Created Date :	10-30-84
Tank Status :	A
Owner Tank Id :	3013
Swrcb Tank Id :	19-039-003010-000003
Actv Date :	12-30-91
Capacity :	8000
Tank Use :	M.V. FUEL
Stg :	P
Content :	DIESEL
Number Of Tanks :	1
Status :	Not reported
Comp Number :	3010
Number :	Not reported
Board Of Equalization :	Not reported
Ref Date :	Not reported
Act Date :	Not reported
Created Date :	Not reported
Tank Status :	Not reported
Owner Tank Id :	Not reported
Swrcb Tank Id :	19-039-003010-000001
Actv Date :	Not reported
Capacity :	8000
Tank Use :	Not reported
Stg :	PRODUCT
Content :	DIESEL
Number Of Tanks :	2
Status :	Not reported
Comp Number :	3010
Number :	Not reported
Board Of Equalization :	Not reported
Ref Date :	Not reported
Act Date :	Not reported
Created Date :	Not reported
Tank Status :	Not reported
Owner Tank Id :	Not reported
Swrcb Tank Id :	19-039-003010-000002
Actv Date :	Not reported
Capacity :	8000
Tank Use :	M.V. FUEL
Stg :	PRODUCT
Content :	DIESEL

VECTA TRANSPORTATION SYSTEM (Continued) S103655167

Number Of Tanks : Not reported

G30 BERKOFF'S ROASTING MILL HIST UST U001562036
East 2110 E 37TH ST N/A
1/8-1/4 VERNON, CA 90058
893 ft.

Site 3 of 3 in cluster G

Relative: Lower

UST HIST:

Facility ID:	41454	Owner Name:	WYNDHAM REALTY
Total Tanks:	1	Region:	STATE
Owner Address:	711 THIRD AVE. NEW YORK CITY, NY 10017		
Tank Used for:	PRODUCT		
Tank Num:	1	Container Num:	1
Tank Capacity:	00000000	Year Installed:	Not reported
Type of Fuel:	REGULAR	Tank Construction:	Not Reported
Leak Detection:	None		
Contact Name:	WILLIAM BERKOFF	Telephone:	(213) 235-3051
Facility Type:	Other	Other Type:	Not reported

Actual: 208 ft.

H31 LEARONAL RCRA-SQG 1000367677
North 2910 S ALAMEDA ST FINDS CAD046444907
1/8-1/4 VERNON, CA 90058
898 ft.

Site 1 of 3 in cluster H

Relative: Higher

RCRAInfo:

Owner: LEARONAL
(415) 555-1212
EPA ID: CAD046444907

Contact: Not reported

Classification: Small Quantity Generator
TSDF Activities: Not reported

Violation Status: No violations found

Actual: 214 ft.

FINDS:
Other Pertinent Environmental Activity Identified at Site:
RESOURCE CONSERVATION AND RECOVERY ACT INFORMATION SYSTEM

H32 L.A. BY-PRODUCTS CO. SWEEPS UST S106928321
North 2860 ALAMEDA ST N/A
1/8-1/4 VERNON, CA 90058
953 ft.

Site 2 of 3 in cluster H

Relative: Higher

SWEEPS:

Status :	Not reported
Comp Number :	1790
Number :	Not reported
Board Of Equalization :	44-010791
Ref Date :	Not reported
Act Date :	Not reported
Created Date :	Not reported
Tank Status :	Not reported
Owner Tank Id :	Not reported

Actual: 215 ft.

L.A. BY-PRODUCTS CO. (Continued) S106928321

Swrcb Tank Id : 19-039-001790-000001
Actv Date : Not reported
Capacity : 7500
Tank Use : M.V. FUEL
Stg : PRODUCT
Content : DIESEL
Number Of Tanks : 2

Status : Not reported
Comp Number : 1790
Number : Not reported
Board Of Equalization : 44-010791
Ref Date : Not reported
Act Date : Not reported
Created Date : Not reported
Tank Status : Not reported
Owner Tank Id : Not reported
Swrcb Tank Id : 19-039-001790-000002
Actv Date : Not reported
Capacity : 7500
Tank Use : M.V. FUEL
Stg : PRODUCT
Content : DIESEL
Number Of Tanks : Not reported

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33 **DAP INC** RCRA-SQG 1000119313
East **2121 E 37TH ST** FINDS CAT000646109
1/8-1/4 **VERNON, CA 90058**
964 ft.

Relative: **Lower**

Actual: **208 ft.**

RCRAInfo:
Owner: NOT REQUIRED
(415) 555-1212
EPA ID: CAT000646109
Contact: Not reported
Classification: Small Quantity Generator
TSDF Activities: Not reported
Violation Status: No violations found

FINDS:
Other Pertinent Environmental Activity Identified at Site:
RESOURCE CONSERVATION AND RECOVERY ACT INFORMATION SYSTEM

H34 **NATIONAL SERV IND SELIG CHEM IND DIV** RCRA-SQG 1000260484
North **2840 S ALAMEDA** FINDS CAD044058212
1/8-1/4 **LOS ANGELES, CA 90058**
974 ft.

Site 3 of 3 in cluster H

Relative: **Higher**

Actual: **215 ft.**

NATIONAL SERV IND SELIG CHEM IND DIV (Continued) 1000260484

RCRAInfo:
Owner: NOT REQUIRED
(415) 555-1212
EPA ID: CAD044058212
Contact: Not reported
Classification: Small Quantity Generator
TSDF Activities: Not reported
Violation Status: No violations found

FINDS:
Other Pertinent Environmental Activity Identified at Site:
RESOURCE CONSERVATION AND RECOVERY ACT INFORMATION SYSTEM

I35 EVER-FRESH FOODS COMPANY HIST UST U001562058
South 4200 S ALAMEDA ST N/A
1/8-1/4 LOS ANGELES, CA 90058
1073 ft.

Site 1 of 2 in cluster I

Relative:
Lower

Actual:
202 ft.

UST HIST:

Facility ID:	6517	Owner Name:	DAIRY FRESH PRODUCTS COMPANY
Total Tanks:	5	Region:	STATE
Owner Address:	4200 S. ALAMEDA STREET LOS ANGELES, CA 90053		
Tank Used for:	PRODUCT		
Tank Num:	1	Container Num:	1
Tank Capacity:	00008000	Year Installed:	1975
Type of Fuel:	DIESEL	Tank Construction:	Not Reported
Leak Detection:	Visual		
Contact Name:	LEWIS CROMPTON	Telephone:	(213) 231-5151
Facility Type:	Other	Other Type:	FOOD DISTRIBUTOR
Facility ID:	6517	Owner Name:	DAIRY FRESH PRODUCTS COMPANY
Total Tanks:	5	Region:	STATE
Owner Address:	4200 S. ALAMEDA STREET LOS ANGELES, CA 90053		
Tank Used for:	PRODUCT		
Tank Num:	2	Container Num:	2
Tank Capacity:	00008000	Year Installed:	1975
Type of Fuel:	REGULAR	Tank Construction:	Not Reported
Leak Detection:	Visual		
Contact Name:	LEWIS CROMPTON	Telephone:	(213) 231-5151
Facility Type:	Other	Other Type:	FOOD DISTRIBUTOR
Facility ID:	6517	Owner Name:	DAIRY FRESH PRODUCTS COMPANY
Total Tanks:	5	Region:	STATE
Owner Address:	4200 S. ALAMEDA STREET LOS ANGELES, CA 90053		
Tank Used for:	PRODUCT		
Tank Num:	3	Container Num:	3
Tank Capacity:	00006000	Year Installed:	1975
Type of Fuel:	UNLEADED	Tank Construction:	Not Reported
Leak Detection:	Visual		
Contact Name:	LEWIS CROMPTON	Telephone:	(213) 231-5151
Facility Type:	Other	Other Type:	FOOD DISTRIBUTOR

EVER-FRESH FOODS COMPANY (Continued) U001562058

Facility ID:	6517	Owner Name:	DAIRY FRESH PRODUCTS COMPANY
Total Tanks:	5	Region:	STATE
Owner Address:	4200 S. ALAMEDA STREET LOS ANGELES, CA 90053		
Tank Used for:	PRODUCT		
Tank Num:	4	Container Num:	4
Tank Capacity:	00000500	Year Installed:	1979
Type of Fuel:	06	Tank Construction:	Not Reported
Leak Detection:	Visual		
Contact Name:	LEWIS CROMPTON	Telephone:	(213) 231-5151
Facility Type:	Other	Other Type:	FOOD DISTRIBUTOR

Facility ID:	6517	Owner Name:	DAIRY FRESH PRODUCTS COMPANY
Total Tanks:	5	Region:	STATE
Owner Address:	4200 S. ALAMEDA STREET LOS ANGELES, CA 90053		
Tank Used for:	WASTE		
Tank Num:	5	Container Num:	5
Tank Capacity:	00000250	Year Installed:	1979
Type of Fuel:	WASTE OIL	Tank Construction:	Not Reported
Leak Detection:	Visual		
Contact Name:	LEWIS CROMPTON	Telephone:	(213) 231-5151
Facility Type:	Other	Other Type:	FOOD DISTRIBUTOR

I36 DAIRY FRESH PRODUCTS CO. SWEEPS UST S106925129
South 4200 ALAMEDA ST N/A
1/8-1/4 VERNON, CA 90058
1073 ft.

Site 2 of 2 in cluster I

Relative:
Lower

Actual:
202 ft.

SWEEPS:

Status :	Not reported
Comp Number :	1800
Number :	Not reported
Board Of Equalization :	Not reported
Ref Date :	Not reported
Act Date :	Not reported
Created Date :	Not reported
Tank Status :	Not reported
Owner Tank Id :	Not reported
Swrcb Tank Id :	19-039-001800-001801
Actv Date :	Not reported
Capacity :	8000
Tank Use :	M.V. FUEL
Stg :	PRODUCT
Content :	DIESEL
Number Of Tanks :	4

Status :	Not reported
Comp Number :	1800
Number :	Not reported
Board Of Equalization :	Not reported
Ref Date :	Not reported
Act Date :	Not reported
Created Date :	Not reported
Tank Status :	Not reported
Owner Tank Id :	Not reported
Swrcb Tank Id :	19-039-001800-001802

DAIRY FRESH PRODUCTS CO. (Continued) S106925129

Actv Date :	Not reported
Capacity :	8000
Tank Use :	M.V. FUEL
Stg :	PRODUCT
Content :	REG UNLEADED
Number Of Tanks :	Not reported
Status :	Not reported
Comp Number :	1800
Number :	Not reported
Board Of Equalization :	Not reported
Ref Date :	Not reported
Act Date :	Not reported
Created Date :	Not reported
Tank Status :	Not reported
Owner Tank Id :	Not reported
Swrcb Tank Id :	19-039-001800-001803
Actv Date :	Not reported
Capacity :	6000
Tank Use :	M.V. FUEL
Stg :	PRODUCT
Content :	REG UNLEADED
Number Of Tanks :	Not reported
Status :	Not reported
Comp Number :	1800
Number :	Not reported
Board Of Equalization :	Not reported
Ref Date :	Not reported
Act Date :	Not reported
Created Date :	Not reported
Tank Status :	Not reported
Owner Tank Id :	Not reported
Swrcb Tank Id :	19-039-001800-001804
Actv Date :	Not reported
Capacity :	550
Tank Use :	OIL
Stg :	PRODUCT
Content :	WASTE OIL
Number Of Tanks :	Not reported

37
South
1/8-1/4
1117 ft.

SURE DELIVERY SERVICE INC
1874 E 43RD ST
LOS ANGELES, CA 90058

RCRA-SQG 1000196424
FINDS CAD982484297

Relative:
Lower

Actual:
202 ft.

SURE DELIVERY SERVICE INC (Continued) 1000196424

RCRAInfo:
Owner: NOT REQUIRED
(415) 555-1212
EPA ID: CAD982484297
Contact: Not reported
Classification: Small Quantity Generator
TSDF Activities: Not reported
Violation Status: No violations found

FINDS:
Other Pertinent Environmental Activity Identified at Site:
RESOURCE CONSERVATION AND RECOVERY ACT INFORMATION SYSTEM

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38 South 1/8-1/4 1125 ft. Relative: Lower Actual: 201 ft.

WESTERN TRUCK & TRAILER CLEANERS S106077480
1839 E 43RD ST N/A
LOS ANGELES, CA 90058

CA Cleaners:
Inactive Date: Not reported
EPA Id: CAL000257899
Facility Address 2 : Not reported
NAICS Code : 81149
Facility Active : Yes
Mail Name : Not reported
Mailing Address: PO BOX 3787
FONTANA, CA 92334
Owner Name : TRANS ADVANTAGE
Mailing Address: ONE PREMIER DR
ST. LOUIS, MO 63026
Owner Telephone : 6363497375
Contact Name : ROBERTO GUERRA
Mailing Address: 1839 E 43RD ST
LOS ANGELES, CA 90058
Contact Telephone : 3232325219
Region Code : 3
Create Date : 08/19/2002
SIC Description : Laundry and Garment Services, NEC (alteration and repair)
NAICS Description : Other Personal and Household Goods Repair and Maintenance

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J39 South 1/8-1/4 1144 ft. Relative: Lower Actual: 201 ft.

KROMBACH A C EDR Historical Cleaners 1009190536
1748 E 43D N/A
LOS ANGELES, CA

Site 1 of 2 in cluster J

EDR Cleaners:
Name: KROMBACH A C
Year: 1942
Type: LAUNDRIES STEAM

Name: KROMBACH A C
Year: 1937
Type: LAUNDRIES HAND

Name: QUICK SERVICE

KRCMBACH A C (Continued) 1009190538

Year: 1933
Type: LAUNDRIES STEAM

J40 South 1/8-1/4 1145 ft. Site 2 of 2 in cluster J
Relative: Lower
Actual: 201 ft.

AZTECA RUBBISH SWF/LF S106528953
1742 EAST 43RD STREET N/A
LOS ANGELES (CITY), CA

LF:

Facility ID: 19-AR-0010 Operator: Azteca Rubbish
Operator Addr: Jaun Cordova
1742 East 43rd Street
Los Angeles, CA 90058
Date: Not reported
Address: Not reported
Prep By: Not reported
DOHS Number: Not reported
CUP Number: Not reported
CIWMB: Not reported
Activity: Small Vol CDI Debris Proc. Operation
Operator's Status: Active
Owner: Cordova, Jaun
Facility Phone 2 : Not reported
Owner Address: Not reported
7817 Cord Avenue
Pico Rivera, CA
Operator Phone: (562) 801-0253 Owner Telephone: (562) 801-0253
Regulation Status: Notification Region: STATE
Location: Not reported
Parcel Num: Not reported
Parcel Num 2 : Not reported
Land Use: Not reported
Sig. Change Since Last Visit: Not reported
Site Size: Not reported
Other Observations: Not reported
Issue And Observations: Not reported
Recommendations / Follow Up: Not reported
Program Type: Not reported
Public Notice: Not reported
PERMTIER: Not reported
Lat/Long: 34 / -118 Permit Date: 3/2/2004
Accepted Waste: Construction/demolition,Inert
Restrictions:

Status : Not reported Swisnumber : Not reported
Site Type : Not reported Aka : Not reported
Type Of Waste : Not reported Disposal Area : Not reported
SWFP Date : Not reported WDR Number : Not reported
Dates Operation : Not reported Closure Approve : Not reported
Dt Of Field Units : Not reported Surface Condition : Not reported
Lea Date : Not reported Reassess Site : Not reported
Leachate : Not reported Emrgncy Response: Not reported
Landfill Gas : Not reported
Priority For Site Assessment : Not reported
Other Recommendation : Not reported
Explanation: Not Reported
No Further Action: Not Reported
Permitted Throughput with Units: 25

AZTECA RUBBISH (Continued) S106528953

Actual Throughput with Units: Tons/day
Actual Capacity with Units: 2480
Permitted Capacity with Units: 2480
Remaining Capacity with Units: Tons/year
Permitted Total Acreage: 1
Remaining Capacity : Not reported
Fill Area: Not reported
Landuse Name: Not reported
Permit Status: Notification
Unit Number: 01
Closure Type: Not reported
Year Opened: Not reported
Inspec Frequency : Quarterly
GIS Source: Map
Category: Transfer/Processing
Closure Date: / /
Disposal Acreage: Not reported
Year Closed: Not reported
Last Waste Tire Inspection Count : Not reported
Last Waste Tire Inspection Date: Not reported
Original Waste Tire Count: Not reported
Original Waste Tire Count Date: Not reported
Type Of Refuse: Not reported
Avg Depth Of Fill: Not reported
Addtl Expansion Area: Not reported
Site Description: Not Reported

K41
North
1/8-1/4
1151 ft.

P&Y T SHIRT
1844 E 27 ST
VERNON, CA 90058

RCRA-SQG 1000133234
FINDS CAD981624703

Site 1 of 3 in cluster K

Relative:
Higher

Actual:
215 ft.

RCRAInfo:
Owner: YOSSI LAGA
(415) 555-1212
EPA ID: CAD981624703
Contact: ENVIRONMENTAL MANAGER
(818) 263-4935
Classification: Small Quantity Generator
TSDF Activities: Not reported

Violation Status: No violations found

FINDS:
Other Pertinent Environmental Activity Identified at Site:
RESOURCE CONSERVATION AND RECOVERY ACT INFORMATION SYSTEM

K42
NNE
1/8-1/4
1165 ft.

CATALINA PACIFIC CONCRETE
1862 E 27TH ST
VERNON, CA 90058

SWEEPS UST S106924089
N/A

Site 2 of 3 in cluster K

Relative:
Higher

Actual:
215 ft.

SWEEPS:
Status : A
Comp Number : 4180
Number : 1
Board Of Equalization : 44-010866
Ref Date : 02-03-92
Act Date : 02-03-92
Created Date : 10-30-84
Tank Status : A

CATALINA PACIFIC CONCRETE (Continued) S106924089

Owner Tank Id : 4181
Swrcb Tank Id : 19-039-004180-004181
Actv Date : 08-06-92
Capacity : 10000
Tank Use : M.V. FUEL
Stg : P
Content : LEADED
Number Of Tanks : 4

Status : A
Comp Number : 4180
Number : 1
Board Of Equalization : 44-010866
Ref Date : 02-03-92
Act Date : 02-03-92
Created Date : 10-30-84
Tank Status : A
Owner Tank Id : 4182
Swrcb Tank Id : 19-039-004180-004182
Actv Date : 02-03-92
Capacity : 20000
Tank Use : M.V. FUEL
Stg : P
Content : DIESEL
Number Of Tanks : Not reported

Status : A
Comp Number : 4180
Number : 1
Board Of Equalization : 44-010866
Ref Date : 02-03-92
Act Date : 02-03-92
Created Date : 10-30-84
Tank Status : A
Owner Tank Id : 4183
Swrcb Tank Id : 19-039-004180-004183
Actv Date : 02-03-92
Capacity : 5000
Tank Use : OIL
Stg : P
Content : MOTOR OIL
Number Of Tanks : Not reported

Status : A
Comp Number : 4180
Number : 1
Board Of Equalization : 44-010866
Ref Date : 02-03-92
Act Date : 02-03-92
Created Date : 10-30-84
Tank Status : A
Owner Tank Id : 4184
Swrcb Tank Id : 19-039-004180-004184
Actv Date : 02-03-92
Capacity : 5000
Tank Use : OIL
Stg : W

CATALINA PACIFIC CONCRETE (Continued) S106924089

Content : WASTE OIL
Number Of Tanks : Not reported

Status : A
Comp Number : 4180
Number : 1
Board Of Equalization : 44-010866
Ref Date : 02-03-92
Act Date : 02-03-92
Created Date : 10-30-84
Tank Status : A
Owner Tank Id : 4181
Swrcb Tank Id : 19-039-004180-004181
Actv Date : 08-06-92
Capacity : 10000
Tank Use : M.V. FUEL
Stg : P
Content : LEADED
Number Of Tanks : 4

Status : A
Comp Number : 4180
Number : 1
Board Of Equalization : 44-010866
Ref Date : 02-03-92
Act Date : 02-03-92
Created Date : 10-30-84
Tank Status : A
Owner Tank Id : 4182
Swrcb Tank Id : 19-039-004180-004182
Actv Date : 02-03-92
Capacity : 20000
Tank Use : M.V. FUEL
Stg : P
Content : DIESEL
Number Of Tanks : Not reported

Status : A
Comp Number : 4180
Number : 1
Board Of Equalization : 44-010866
Ref Date : 02-03-92
Act Date : 02-03-92
Created Date : 10-30-84
Tank Status : A
Owner Tank Id : 4183
Swrcb Tank Id : 19-039-004180-004183
Actv Date : 02-03-92
Capacity : 5000
Tank Use : OIL
Stg : P
Content : MOTOR OIL
Number Of Tanks : Not reported

Status : A
Comp Number : 4180
Number : 1

CATALINA PACIFIC CONCRETE (Continued) S106924089

Board Of Equalization : 44-010866
Ref Date : 02-03-92
Act Date : 02-03-92
Created Date : 10-30-84
Tank Status : A
Owner Tank Id : 4184
Swrcb Tank Id : 19-039-004180-004184
Actv Date : 02-03-92
Capacity : 5000
Tank Use : OIL
Stg : W
Content : WASTE OIL
Number Of Tanks : Not reported

Status : Not reported
Comp Number : 4180
Number : Not reported
Board Of Equalization : 44-010866
Ref Date : Not reported
Act Date : Not reported
Created Date : Not reported
Tank Status : Not reported
Owner Tank Id : Not reported
Swrcb Tank Id : 19-039-004180-004185
Actv Date : Not reported
Capacity : 10000
Tank Use : M.V. FUEL
Stg : PRODUCT
Content : DIESEL
Number Of Tanks : 4

Status : Not reported
Comp Number : 4180
Number : Not reported
Board Of Equalization : 44-010866
Ref Date : Not reported
Act Date : Not reported
Created Date : Not reported
Tank Status : Not reported
Owner Tank Id : Not reported
Swrcb Tank Id : 19-039-004180-004186
Actv Date : Not reported
Capacity : 3000
Tank Use : M.V. FUEL
Stg : PRODUCT
Content : REG UNLEADED
Number Of Tanks : Not reported

Status : Not reported
Comp Number : 4180
Number : Not reported
Board Of Equalization : 44-010866
Ref Date : Not reported
Act Date : Not reported
Created Date : Not reported
Tank Status : Not reported
Owner Tank Id : Not reported

CATALINA PACIFIC CONCRETE (Continued) S106924089

Swrcb Tank Id :	19-039-004180-004187
Actv Date :	Not reported
Capacity :	500
Tank Use :	CHEMICAL
Stg :	PRODUCT
Content :	SOLVENT
Number Of Tanks :	Not reported
Status :	Not reported
Comp Number :	4180
Number :	Not reported
Board Of Equalization :	44-010866
Ref Date :	Not reported
Act Date :	Not reported
Created Date :	Not reported
Tank Status :	Not reported
Owner Tank Id :	Not reported
Swrcb Tank Id :	19-039-004180-004188
Actv Date :	Not reported
Capacity :	1000
Tank Use :	OIL
Stg :	PRODUCT
Content :	OIL
Number Of Tanks :	Not reported

K43 ALAMEDA HIST UST U001552025
NNE 1862 E 27TH ST CA WDS N/A
1/8-1/4 LOS ANGELES, CA 90058
1166 ft.

Site 3 of 3 in cluster K

Relative: Higher

Actual: 215 ft.

WDS:

Facility ID:	4 191006257		
Facility Contact	SENTNER, TINA	Facility Telephone	(626) 852-6200
SIC Code:	Not reported	SIC Code 2:	Not reported
Agency Name:	CA PORTLAND CEMENT		
Agency Address:	2025 E Financial Way Glendora 91741 - 4692		
Agency Contact:	SENTNER, TINA	Agency Phone:	(626) 852-6200
Design Flow:	Not reported	Baseline Flow:	Not reported

Facility Type: Industrial - Facility that treats and/or disposes of liquid or semisolid wastes from any servicing, producing, manufacturing or processing operation of whatever nature, including mining, gravel washing, geothermal operations, air conditioning, ship building and repairing, oil production, storage and disposal operations, water pumping.

Facility Status: Active - Any facility with a continuous or seasonal discharge that is under Waste Discharge Requirements.

Agency Type: Private

Waste Type: Not reported

Threat to Water: Minor Threat to Water Quality. A violation of a regional board order should cause a relatively minor impairment of beneficial uses compared to a major or minor threat. Not: All nurds without a TTWQ will be considered a minor threat to water quality unless coded at a higher Level. A Zero (0) may be used to code those NURDS that are found to represent no threat to water quality.

Complexity: Category C - Facilities having no waste treatment systems, such as cooling water dischargers or thosewho must comply through best management practices, facilities with passive waste treatment and disposal systems, such as septic systems with subsurface disposal, or dischargers having waste storage systems with land disposel such as dairy waste ponds.

Reclamation: Not reported

ALAMEDA (Continued) U001562025

POTW: Not reported
NPDES Number: CAS000001 The 1st 2 characters designate the state. The remaining 7 are assigned by the Regional Board
Subregion: 4

UST HIST:

Facility ID:	4810	Owner Name:	CAL MAT CO. FORMERLY CONROCK C
Total Tanks:	3	Region:	STATE
Owner Address:	3200 SAN FERNANDO RD LOS ANGELES, CA 90065		
Tank Used for:	PRODUCT		
Tank Num:	1	Container Num:	1
Tank Capacity:	00003000	Year Installed:	Not reported
Type of Fuel:	UNLEADED	Tank Construction:	Not Reported
Leak Detection:	None		
Contact Name:	Not reported	Telephone:	(213) 258-2777
Facility Type:	Other	Other Type:	CONCRETE BATCH PLANT

Facility ID:	4810	Owner Name:	CAL MAT CO. FORMERLY CONROCK C
Total Tanks:	3	Region:	STATE
Owner Address:	3200 SAN FERNANDO RD LOS ANGELES, CA 90065		
Tank Used for:	PRODUCT		
Tank Num:	2	Container Num:	2
Tank Capacity:	00010000	Year Installed:	Not reported
Type of Fuel:	DIESEL	Tank Construction:	Not Reported
Leak Detection:	None		
Contact Name:	Not reported	Telephone:	(213) 258-2777
Facility Type:	Other	Other Type:	CONCRETE BATCH PLANT

Facility ID:	4810	Owner Name:	CAL MAT CO. FORMERLY CONROCK C
Total Tanks:	3	Region:	STATE
Owner Address:	3200 SAN FERNANDO RD LOS ANGELES, CA 90065		
Tank Used for:	PRODUCT		
Tank Num:	3	Container Num:	3
Tank Capacity:	00000500	Year Installed:	Not reported
Type of Fuel:	Not reported	Tank Construction:	Not Reported
Leak Detection:	Not reported		
Contact Name:	Not reported	Telephone:	(213) 258-2777
Facility Type:	Other	Other Type:	CONCRETE BATCH PLANT

L44 JIM'S ARCO STATION HIST UST U001562552
South 4321 S ALAMEDA ST N/A
1/8-1/4 LOS ANGELES, CA 90085
1201 ft.

Site 1 of 4 in cluster L

Relative:
Lower

UST HIST:

Actual:
201 ft.

Facility ID:	50605	Owner Name:	JENNIE & CHRIS FOTINAKES
Total Tanks:	5	Region:	STATE
Owner Address:	2630 CALIFORNIA ST. HUNTINGTON PARK, CA 90255		
Tank Used for:	PRODUCT		
Tank Num:	1	Container Num:	1
Tank Capacity:	00004000	Year Installed:	Not reported
Type of Fuel:	REGULAR	Tank Construction:	Not Reported
Leak Detection:	Stock Inventor, Pressure Test		
Contact Name:	JIM GANTOUS (LESSEE)	Telephone:	(213) 232-9887

JIM'S ARCO STATION (Continued) U001562552

Facility Type:	Gas Station	Other Type:	Not reported
Facility ID:	50605	Owner Name:	JENNIE & CHRIS FOTINAKES
Total Tanks:	5	Region:	STATE
Owner Address:	2630 CALIFORNIA ST. HUNTINGTON PARK, CA 90255		
Tank Used for:	PRODUCT		
Tank Num:	2	Container Num:	2
Tank Capacity:	00004000	Year Installed:	Not reported
Type of Fuel:	REGULAR	Tank Construction:	Not Reported
Leak Detection:	Stock Inventor, Pressure Test		
Contact Name:	JIM GANTOUS (LESSEE)	Telephone:	(213) 232-9887
Facility Type:	Gas Station	Other Type:	Not reported
Facility ID:	50605	Owner Name:	JENNIE & CHRIS FOTINAKES
Total Tanks:	5	Region:	STATE
Owner Address:	2630 CALIFORNIA ST. HUNTINGTON PARK, CA 90255		
Tank Used for:	PRODUCT		
Tank Num:	3	Container Num:	3
Tank Capacity:	00006000	Year Installed:	Not reported
Type of Fuel:	UNLEADED	Tank Construction:	Not Reported
Leak Detection:	Stock Inventor, Pressure Test		
Contact Name:	JIM GANTOUS (LESSEE)	Telephone:	(213) 232-9887
Facility Type:	Gas Station	Other Type:	Not reported
Facility ID:	50605	Owner Name:	JENNIE & CHRIS FOTINAKES
Total Tanks:	5	Region:	STATE
Owner Address:	2630 CALIFORNIA ST. HUNTINGTON PARK, CA 90255		
Tank Used for:	PRODUCT		
Tank Num:	4	Container Num:	4
Tank Capacity:	00012000	Year Installed:	1981
Type of Fuel:	DIESEL	Tank Construction:	Not Reported
Leak Detection:	Stock Inventor, Pressure Test		
Contact Name:	JIM GANTOUS (LESSEE)	Telephone:	(213) 232-9887
Facility Type:	Gas Station	Other Type:	Not reported
Facility ID:	50605	Owner Name:	JENNIE & CHRIS FOTINAKES
Total Tanks:	5	Region:	STATE
Owner Address:	2630 CALIFORNIA ST. HUNTINGTON PARK, CA 90255		
Tank Used for:	WASTE		
Tank Num:	5	Container Num:	5
Tank Capacity:	00000550	Year Installed:	Not reported
Type of Fuel:	06	Tank Construction:	Not Reported
Leak Detection:	None		
Contact Name:	JIM GANTOUS (LESSEE)	Telephone:	(213) 232-9887
Facility Type:	Gas Station	Other Type:	Not reported

L45
South
1/8-1/4
1201 ft.

MOBIL SERVICE STATION VARTAN EKMEKCHIAN
4321 S ALAMEDA ST
LOS ANGELES, CA 90058

CA FID UST S101584390
SWEEPS UST N/A

Site 2 of 4 in cluster L

Relative:
Lower

Actual:
201 ft.

FID:

Facility ID:	19011033	Regulate ID:	00017041
Reg By:	Active Underground Storage Tank Location		
Cortese Code:	Not reported	SIC Code:	Not reported
Status:	Active	Facility Tel:	(213) 232-9887
Mail To:	Not reported 4321 S ALAMEDA ST LOS ANGELES, CA 90058		
Contact:	Not reported	Contact Tel:	Not reported
DUNS No:	Not reported	NPDES No:	Not reported
Creation:	10/22/93	Modified:	00/00/00
EPA ID:	Not reported		
Comments:	Not reported		

SWEEPS:

Status :	A
Comp Number :	1081
Number :	1
Board Of Equalization :	44-000400
Ref Date :	05-11-93
Act Date :	03-16-94
Created Date :	02-29-88
Tank Status :	A
Owner Tank Id :	Not reported
Swrcb Tank Id :	19-050-001081-000001
Actv Date :	04-20-88
Capacity :	11000
Tank Use :	M.V. FUEL
Stg :	P
Content :	DIESEL
Number Of Tanks :	3

Status :	A
Comp Number :	1081
Number :	1
Board Of Equalization :	44-000400
Ref Date :	05-11-93
Act Date :	03-16-94
Created Date :	02-29-88
Tank Status :	A
Owner Tank Id :	Not reported
Swrcb Tank Id :	19-050-001081-000002
Actv Date :	04-20-88
Capacity :	6000
Tank Use :	CHEMICAL
Stg :	P
Content :	UNKNOWN
Number Of Tanks :	Not reported

Status :	A
Comp Number :	1081
Number :	1
Board Of Equalization :	44-000400
Ref Date :	05-11-93

MOBIL SERVICE STATION VARTAN EKMEKCHIAN (Continued) S101584390

Act Date :	03-16-94
Created Date :	02-29-88
Tank Status :	A
Owner Tank Id :	Not reported
Swrcb Tank Id :	19-050-001081-000003
Actv Date :	04-20-88
Capacity :	8000
Tank Use :	M.V. FUEL
Stg :	P
Content :	REG UNLEADED
Number Of Tanks :	Not reported

L46
South
1/8-1/4
1201 ft.

Relative:
Lower

Actual:
201 ft.

VERNON FUEL DISTRIBUTIONINC. UST U003982098
4321 S ALAMEDA ST N/A
LOS ANGELES, CA 90058

Site 3 of 4 in cluster L

State UST:

Facility ID:	25195
Total Tanks:	Not reported
Region:	STATE
Local Agency:	Los Angeles, Los Angeles County

L47
South
1/8-1/4
1201 ft.

Relative:
Lower

Actual:
201 ft.

JIM'S ARCO HIST UST U001562083
4321 S ALAMEDA ST N/A
LOS ANGELES, CA 90058

Site 4 of 4 in cluster L

UST HIST:

Facility ID:	17041	Owner Name:	JIM GANTOUS
Total Tanks:	3	Region:	STATE
Owner Address:	4419 FULTON AVE. SHERMAN OAKS, CA 91403		
Tank Used for:	PRODUCT		
Tank Num:	1	Container Num:	1
Tank Capacity:	00011000	Year Installed:	Not reported
Type of Fuel:	DIESEL	Tank Construction:	Not Reported
Leak Detection:	Stock Inventor		
Contact Name:	JIM GANTOUS	Telephone:	(213) 232-9887
Facility Type:	Gas Station	Other Type:	Not reported
Facility ID:	17041	Owner Name:	JIM GANTOUS
Total Tanks:	3	Region:	STATE
Owner Address:	4419 FULTON AVE. SHERMAN OAKS, CA 91403		
Tank Used for:	PRODUCT		
Tank Num:	2	Container Num:	2
Tank Capacity:	00006000	Year Installed:	Not reported
Type of Fuel:	Not reported	Tank Construction:	Not Reported
Leak Detection:	Stock Inventor		
Contact Name:	JIM GANTOUS	Telephone:	(213) 232-9887
Facility Type:	Gas Station	Other Type:	Not reported
Facility ID:	17041	Owner Name:	JIM GANTOUS
Total Tanks:	3	Region:	STATE
Owner Address:	4419 FULTON AVE.		

JIM'S ARCO (Continued) U001562083

SHERMAN OAKS, CA 91403

Tank Used for:	PRODUCT		
Tank Num:	3	Container Num:	3
Tank Capacity:	00008000	Year Installed:	Not reported
Type of Fuel:	REGULAR	Tank Construction:	Not Reported
Leak Detection:	Stock Inventor		
Contact Name:	JIM GANTOUS	Telephone:	(213) 232-9887
Facility Type:	Gas Station	Other Type:	Not reported

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48 **BOYS MARKET WAREHOUSE** **LUST S102425589**
NNW **2652 LONG BEACH AVE W** **Cortese N/A**
1/4-1/2 **LOS ANGELES, CA 90011**
1524 ft.

Relative: Higher
Actual: 217 ft.

State LUST:

Cross Street:	ADAMS BLVD E		
Qty Leaked:	Not reported		
Case Number	Not reported		
Reg Board:	4		
Chemical:	Diesel		
Lead Agency:	Regional Board		
Local Agency :	19050		
Case Type:	Soil only		
Status:	**Case Closed**		
Review Date:	Not reported	Confirm Leak:	Not reported
Workplan:	Not reported	Prelim Assess:	Not reported
Pollution Char:	Not reported	Remed Plan:	Not reported
Remed Action:	Not reported		
Monitoring:	Not reported		
Close Date:	1996-10-11 00:00:00		
Release Date:	Not reported		
Cleanup Fund Id :	Not reported		
Discover Date :	Not reported		
Enforcement Dt :	Not reported		
Enf Type:	Not reported		
Enter Date :	Not reported		
Funding:	Not reported		
Staff Initials:	PEJ		
How Discovered:	Not reported		
How Stopped:	Not reported		
Interim :	Yes		
Leak Cause:	Not reported		
Leak Source:	Not reported		
MTBE Date :	Not reported		
Max MTBE GW :	Not reported		
MTBE Tested:	Not Required to be Tested.		
Priority:	Not reported		
Local Case # :	Not reported		
Beneficial:	Not reported		
Staff :	UNK		
GW Qualifier :	Not reported		
Max MTBE Soil :	Not reported		
Soil Qualifier :	Not reported		
Hydr Basin #:	SAN FERNANDO VALLEY		
Operator :	OLD CASE #900580061		
Oversight Prgm:	LUST		
Review Date :	1992-03-10 00:00:00		
Stop Date :	Not reported		
Work Suspended :	Not reported		

BOYS MARKET WAREHOUSE (Continued) S102425589

Responsible PartyQUALITY FOODS INTERNATIONAL
RP Address: P.O. BOX 42010, LOS ANGELES CA 90042
Global Id: T0603700491
Org Name: Not reported
Contact Person: Not reported
MTBE Conc: 0
Mtbe Fuel: 0
Water System Name: Not reported
Well Name: Not reported
Distance To Lust: 0
Waste Discharge Global ID: Not reported
Waste Disch Assigned Name: Not reported
Summary : Not reported

LUST Region 4:
Report Date: 4/18/1988
Lead Agency: Regional Board
Local Agency: 19050
Substance: Diesel
Case Type: Soil
Status: Case Closed
Region: 4
Staff: UNK

Date Case Last Changed on Database:	3/10/1992
Date Leak Record Entered:	6/14/1988
Historical Max MTBE Date:	Not reported
GW Qualifier:	Not reported
Soil Qualifier:	Not reported
Hist Max MTBE Conc in Groundwater:	Not reported
Hist Max MTBE Conc in Soil :	Not reported
County:	Los Angeles
Organization :	Not reported
Regional Board:	04
Owner Contact:	Not reported
Responsible Party:	QUALITY FOODS INTERNATIONAL
RP Address:	P.O. BOX 42010, LOS ANGELES CA 90042
Significant Interim Remedial Action Taken:	Yes
Program :	LUST
Lat / Long :	34.0127378 / -1
Local Agency Staff:	PEJ
Beneficial Use :	Not reported
Priority :	Not reported
Cleanup Fund Id :	Not reported
Suspended :	Not reported
Local Case No :	Not reported
Substance Quantity :	Not reported
Abatement Method Used at the Site:	Not reported
Operator :	OLD CASE #900580061
Water System :	Not reported
Well Name :	Not reported
Approx. Dist To Production Well (ft) :	4307.347196356062746586441833 6
Assigned Name :	Not reported
W Global ID :	Not reported
Source of Cleanup Funding:	Not reported
Date the Leak was Discovered:	Not reported
How the Leak was Discovered:	Not reported
How the Leak was Stopped:	Not reported
Cause of Leak:	Not reported

BOYS MARKET WAREHOUSE (Continued) S102425589

Leak Source:	Not reported
Date The Leak was Stopped:	Not reported
Date Confirmation Leak Began:	Not reported
Preliminary Site Assessment Workplan Submitted:	Not reported
Preliminary Site Assessment Began:	Not reported
Pollution Characterization Began:	7/24/1989
Remediation Plan Submitted:	Not reported
Remedial Action Underway:	Not reported
Post Remedial Action Monitoring Began:	Not reported
Date the Case was Closed:	10/11/1996
Enforcement Action Date:	Not reported
Date Leak First Reported:	4/18/1988
Enforcement Type:	Not reported
Global ID :	T0603700491
Cross Street:	ADAMS BLVD E
Summary :	

CORTESE:

Region:	CORTESE
Fac Address 2:	2652 LONG BEACH AVE W

M49
SSE
1/4-1/2
1560 ft.

WILLIAMS WAREHOUSE Cortese S105024709
1925 VERNON N/A
LOS ANGELES, CA 90058

Site 1 of 2 in cluster M

Relative:
Lower

Actual:
201 ft.

CORTESE:

Region:	CORTESE
Fac Address 2:	Not reported

M50
SSE
1/4-1/2
1560 ft.

WILLIAMS WAREHOUSE LUST S104159641
1925 VERNON AVE E N/A
VERNON, CA 90058

Site 2 of 2 in cluster M

Relative:
Lower

Actual:
201 ft.

State LUST:

Cross Street:	Not reported		
Qty Leaked:	Not reported		
Case Number	Not reported		
Reg Board:	4		
Chemical:	Gasoline		
Lead Agency:	Local Agency		
Local Agency :	19038		
Case Type:	Soil only		
Status:	**Case Closed**		
Review Date:	Not reported	Confirm Leak:	Not reported
Workplan:	Not reported	Prelim Assess:	Not reported
Pollution Char:	Not reported	Remed Plan:	Not reported
Remed Action:	Not reported		
Monitoring:	Not reported		
Close Date:	2000-01-01 00:00:00		
Release Date:	Not reported		
Cleanup Fund Id :	Not reported		
Discover Date :	Not reported		
Enforcement Dt :	Not reported		
Enf Type:	Not reported		
Enter Date :	Not reported		

WILLIAMS WAREHOUSE (Continued) S104159641

Funding: Not reported
Staff Initials: UNK
How Discovered: Not reported
How Stopped: Not reported
Interim : Not reported
Leak Cause: Not reported
Leak Source: Not reported
MTBE Date : Not reported
Max MTBE GW : Not reported
MTBE Tested: Site NOT Tested for MTBE.Includes Unknown and Not Analyzed.
Priority: Not reported
Local Case # : Not reported
Beneficial: Not reported
Staff : UNK
GW Qualifier : Not reported
Max MTBE Soil : Not reported
Soil Qualifier : Not reported
Hydr Basin #: SAN FERNANDO VALLEY
Operator : Not reported
Oversight Prgm: LUST
Review Date : 1989-08-04 00:00:00
Stop Date :. Not reported
Work Suspended :Not reported
Responsible PartyBLANK RP
RP Address: Not reported
Global Id: T0603700102
Org Name: Not reported
Contact Person: Not reported
MTBE Conc: 0
Mtbe Fuel: 1
Water System Name: Not reported
Well Name: Not reported
Distance To Lust: 0
Waste Discharge Global ID: Not reported
Waste Disch Assigned Name: Not reported
Summary : SEE HARD COPY FOR STATUS 9

LUST Region 4:
Report Date: 11/18/1988
Lead Agency: Local Agency
Local Agency: 19039
Substance: Gasoline
Case Type: Soil
Status: Case Closed
Region: 4
Staff: UNK
Date Case Last Changed on Database: 8/4/1989
Date Leak Record Entered: 8/4/1989
Historical Max MTBE Date: Not reported
GW Qualifier: Not reported
Soil Qualifier: Not reported
Hist Max MTBE Conc in Groundwater: Not reported
Hist Max MTBE Conc in Soil : Not reported
County: Los Angeles
Organization : Not reported
Regional Board: 04
Owner Contact: Not reported
Responsible Party: BLANK RP

WILLIAMS WAREHOUSE (Continued) S104159641

RP Address:	Not reported
Significant Interim Remedial Action Taken:	Not reported
Program :	LUST
Lat / Long :	34.0038391 / -1
Local Agency Staff:	UNK
Beneficial Use :	Not reported
Priority :	Not reported
Cleanup Fund Id :	Not reported
Suspended :	Not reported
Local Case No :	Not reported
Substance Quantity :	Not reported
Abatement Method Used at the Site:	Not reported
Operator :	Not reported
Water System :	Not reported
Well Name :	Not reported
Approx. Dist To Production Well (ft) :	1983.4091212079501351919337435
Assigned Name :	Not reported
W Global ID :	Not reported
Source of Cleanup Funding:	Not reported
Date the Leak was Discovered:	Not reported
How the Leak was Discovered:	Not reported
How the Leak was Stopped:	Not reported
Cause of Leak:	Not reported
Leak Source:	Not reported
Date The Leak was Stopped:	Not reported
Date Confirmation Leak Began:	Not reported
Preliminary Site Assessment Workplan Submitted:	Not reported
Preliminary Site Assessment Began:	Not reported
Pollution Characterization Began:	Not reported
Remediation Plan Submitted:	Not reported
Remedial Action Underway:	Not reported
Post Remedial Action Monitoring Began:	Not reported
Date the Case was Closed:	1/1/2000
Enforcement Action Date:	Not reported
Date Leak First Reported:	11/18/1988
Enforcement Type:	Not reported
Global ID :	T0603700102
Cross Street:	Not reported
Summary :	SEE HARD COPY FOR STATUS 9

N51 M-5 STEEL SLIC S101540042
East 2901 SACO N/A
1/4-1/2 VERNON, CA 90058
1723 ft.

Site 1 of 2 in cluster N

Relative:
Higher

SLIC Region 4:

Facility Status:	Unassigned
Region:	4
SLIC	0213
Staff:	Not reported
Substance:	TPH/V

Actual:
209 ft.

Map ID / Direction / Distance / Distance (ft.) / Elevation	Site	Database(s)	EDR ID Number / EPA ID Number
N52 East 1/4-1/2 1723 ft.	M-5 STEEL 2901 SACO ST VERNON, CA 90058	HAZNET SLIC	S103649888 N/A

Site 2 of 2 in cluster N

Relative:
Higher

Actual:
209 ft.

HAZNET:

Gepaid:	CAC001129208
TSD EPA ID:	CAT080010101
Gen County:	Los Angeles
Tsd County:	San Diego
Tons:	1.2500
Facility Address 2:	Not reported
Waste Category:	Contaminated soil from site clean-ups
Disposal Method:	Transfer Station
Contact:	BORG-WARNER SECURITY CORP
Telephone:	(000) 000-0000
Mailing Name:	Not reported
Mailing Address:	200 S MICHIGAN AVE CHICAGO, IL 60604
County	Los Angeles

Gepaid:	CAC001129208
TSD EPA ID:	CAT080010101
Gen County:	Los Angeles
Tsd County:	San Diego
Tons:	.9382
Facility Address 2:	Not reported
Waste Category:	Organic liquids with metals Alkaline solution (pH <UN-> 12.5) with metals (antimony, arsenic, barium, beryllium, cadmium, chromium, cobalt, copper, lead, mercury, molybdenum, nickel, selenium, silver, thallium, vanadium, and zinc)
Disposal Method:	Transfer Station
Contact:	BORG-WARNER SECURITY CORP
Telephone:	(000) 000-0000
Mailing Name:	Not reported
Mailing Address:	200 S MICHIGAN AVE CHICAGO, IL 60604
County	Los Angeles

Gepaid:	CAC001129208
TSD EPA ID:	CAD028409019
Gen County:	Los Angeles
Tsd County:	Los Angeles
Tons:	3.1275
Facility Address 2:	Not reported
Waste Category:	Waste oil and mixed oil
Disposal Method:	Treatment, Tank
Contact:	BORG-WARNER SECURITY CORP
Telephone:	(000) 000-0000
Mailing Name:	Not reported
Mailing Address:	200 S MICHIGAN AVE CHICAGO, IL 60604
County	Los Angeles

M-S STEEL (Continued) S103649888

Gepaid: CAC001209944
TSD EPA ID: CAD099452708
Gen County: Los Angeles
Tsd County: Los Angeles
Tons: 14.5950
Facility Address 2: Not reported
Waste Category: Unspecified aqueous solution
Disposal Method: Recycler
Contact: CORPORATION
Telephone: (000) 000-0000
Mailing Name: Not reported
Mailing Address: 200 SO. MICHIGAN AVE.
CHICAGO, IL 60604
County Los Angeles

Gepaid: CAC001209944
TSD EPA ID: UTC093012201
Gen County: Los Angeles
Tsd County: 99
Tons: 101.7516
Facility Address 2: Not reported
Waste Category: Contaminated soil from site clean-ups
Disposal Method: Disposal, Land Fill
Contact: CORPORATION
Telephone: (000) 000-0000
Mailing Name: Not reported
Mailing Address: 200 SO. MICHIGAN AVE.
CHICAGO, IL 60604
County Los Angeles

CA STATE SLIC :
Global Id : SLT4L2131781
Region : STATE
Assigned Name : SLICSITE
Lead Agency Contact : SLIC
Lead Agency : LOS ANGELES RWQCB (REGION 4)
Lead Agency Case Number : 213
Responsible Party : Not reported
Recent Dtw : Not reported
Facility Status : Case Open
Substance Released : Not reported

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53 **SOUTHWEST POLICE STATION 9/8-2** LUST S101297134
WNW **1546 MARTIN LUTHER KING BLVD W** Cortese N/A
1/4-1/2 **LOS ANGELES, CA 90062**
1789 ft.

Relative: Higher
Actual: 209 ft.

State LUST:
Cross Street: DENKER AVE
Qty Leaked: Not reported
Case Number Not reported
Reg Board: 4
Chemical: Diesel
Lead Agency: Local Agency
Local Agency : 19050
Case Type: Soil only
Status: Leak being confirmed
Review Date: 1986-10-29 00:00:00 Confirm Leak: 1986-10-29 00:00:00
Workplan: Not reported Prelim Assess: Not reported

SOUTHWEST POLICE STATION 9/8-2 (Continued) S101297134

Pollution Char: Not reported Remed Plan: Not reported
Remed Action: Not reported
Monitoring: Not reported
Close Date: Not reported
Release Date: Not reported
Cleanup Fund Id : Not reported
Discover Date : Not reported
Enforcement Dt : Not reported
Enf Type: Not reported
Enter Date : Not reported
Funding: Not reported
Staff Initials: PEJ
How Discovered: Tank Test
How Stopped: Not reported
Interim : Not reported
Leak Cause: UNK
Leak Source: Piping
MTBE Date : Not reported
Max MTBE GW : Not reported
MTBE Tested: Not Required to be Tested.
Priority: Not reported
Local Case # : Not reported
Beneficial: Not reported
Staff : UNK
GW Qualifier : Not reported
Max MTBE Soil : Not reported
Soil Qualifier : Not reported
Hydr Basin #: SAN FERNANDO VALLEY
Operator : L.A. POLICE DEPARTMENT
Oversight Prgm: LUST
Review Date : 1987-08-10 00:00:00
Stop Date : Not reported
Work Suspended :Not reported
Responsible Party CITY OF LOS ANGELES
RP Address: 200 N MAIN, ROOM 800, LOS ANGELES, CA 90012
Global Id: T0603701157
Org Name: Not reported
Contact Person: Not reported
MTBE Conc: 0
Mtbe Fuel: 0
Water System Name: Not reported
Well Name: Not reported
Distance To Lust: 0
Waste Discharge Global ID: Not reported
Waste Disch Assigned Name: Not reported
Summary : PIPING LEAKED DURING TANK TEST ONLY.

LUST Region 4:
Report Date: 10/29/1986
Lead Agency: Local Agency
Local Agency: 19050
Substance: Diesel
Case Type: Soil
Status: Leak being confirmed
Region: 4
Staff: UNK
Date Case Last Changed on Database: 8/10/1987
Date Leak Record Entered: 12/31/1986

SOUTHWEST POLICE STATION 9/8-2 (Continued) S101297134

Historical Max MTBE Date:	Not reported
GW Qualifier:	Not reported
Soil Qualifier:	Not reported
Hist Max MTBE Conc in Groundwater:	Not reported
Hist Max MTBE Conc in Soil :	Not reported
County:	Los Angeles
Organization :	Not reported
Regional Board:	04
Owner Contact:	Not reported
Responsible Party:	CITY OF LOS ANGELES
RP Address:	200 N MAIN, ROOM 800, LOS ANGELES, CA 90012
Significant Interim Remedial Action Taken:	Not reported
Program :	LUST
Lat / Long :	34.0107191 / -1
Local Agency Staff:	PEJ
Beneficial Use :	Not reported
Priority :	Not reported
Cleanup Fund Id :	Not reported
Suspended :	Not reported
Local Case No :	Not reported
Substance Quantity :	Not reported
Abatement Method Used at the Site:	Not reported
Operator :	L.A. POLICE DEPARTMENT
Water System :	Not reported
Well Name :	Not reported
Approx. Dist To Production Well (ft) :	2512.675818332533695932141008
Assigned Name :	Not reported
W Global ID :	Not reported
Source of Cleanup Funding:	Not reported
Date the Leak was Discovered:	10/21/1986
How the Leak was Discovered:	Tank Test
How the Leak was Stopped:	Not reported
Cause of Leak:	UNK
Leak Source:	Piping
Date The Leak was Stopped:	10/22/1986
Date Confirmation Leak Began:	10/29/1986
Preliminary Site Assessment Workplan Submitted:	Not reported
Preliminary Site Assessment Began:	Not reported
Pollution Characterization Began:	Not reported
Remediation Plan Submitted:	Not reported
Remedial Action Underway:	Not reported
Post Remedial Action Monitoring Began:	Not reported
Date the Case was Closed:	Not reported
Enforcement Action Date:	Not reported
Date Leak First Reported:	10/29/1986
Enforcement Type:	Not reported
Global ID :	T0603701157
Cross Street:	DENKER AVE
Summary :	PIPING LEAKED DURING TANK TEST ONLY.

CORTESE:

Region:	CORTESE
Fac Address 2:	Not reported

O54 | METRO-VERNON | WMUDS/SWAT | S103441514
North | SE OF ALAMEDA / 25TH ST | | N/A
1/4-1/2 | VERNON, CA
1790 ft.

Site 1 of 2 in cluster O

Relative:
Higher

Actual:
219 ft.

WMUDS:

Region:	4
Date of Last Facility Edit:	Not reported
Last Facility Editors:	Not reported
Waste Discharge System ID:	4 190272NUR
Solid Waste Information ID:	Not reported
Waste Discharge System:	False
Solid Waste Assessment Test Program:	True
Facility Name:	Not reported
Toxic Pits Cleanup Act Program:	False
Resource Conservation Recovery Act Program:	False
Department of Defense:	False
Open to Public:	False
Number of WMUDS at Facility:	1
Facility Telephone:	Not reported
Primary Standard Industrial Classification:	Not reported
Secondary Standard Industrial Classification:	Not reported
Solid Waste Assessment Test Program Name:	METRO
NPID:	Not reported
Tonnage:	0
Regional Board ID:	Not reported
Municipal Solid Waste:	False
Superorder:	False
Sub Chapter 15:	False
Reg. Board Project Officer:	LT
Section Range:	Not reported
RCRA Facility:	Not reported
Waste Discharge Requirements:	Not reported
Base Meridian:	Not reported
Waste List:	False
Facility Description:	Not reported
Self-Monitoring Rept. Frequency:	Not reported

Threat to Water Quality:Not reported

Agency:	METRO
Address:	Not reported
Department:	Not reported
Contact:	Not reported
Telephone:	Not reported
Landowner:	Not reported
Address:	CA
Telephone:	Not reported
Contact:	Not reported

P55 | RENU PLATING COMPANY INC | Cal-Sites | S101480804
NW | 1531 EAST 32ND STREET | AWP | N/A
1/4-1/2 | LOS ANGELES, CA 90011
1795 ft.

Site 1 of 3 in cluster P

Relative:
Higher

Actual:
213 ft.

CAL-SITES:

Facility ID	19340643
Status:	AWP - ANNUAL WORKPLAN (AWP) - ACTIVE SITE
Status Date:	06/28/2001
Lead:	DTSC
Region:	3 - GLENDALE

RENU PLATING COMPANY INC (Continued) S101480804

Branch:	SB - SO CAL - CYPRESS	
File Name:	Not reported	
Status Name:	ANNUAL WORKPLAN - ACTIVE SITE	
Lead Agency:	DEPT OF TOXIC SUBSTANCES CONTROL	Not reported
NPL:	Not Listed	
SIC:	34 MANU - FABRICATED METAL PRODUCTS	
Facility Type:	RP	
Type Name:	RESPONSIBLE PARTY	
Staff Member Responsible for Site:	DZOGAIB	
Supervisor Responsible for Site:	Not reported	
Region Water Control Board:	LA - LOS ANGELES	
Access:	Not reported	
Cortese:	Not reported	
Hazardous Ranking Score:	Not reported	
Date Site Hazard Ranked:	Not reported	
Groundwater Contamination:	Not reported	
No. of Contamination Sources:	0	
Lat/Long:	Not reported	
Lat/long Method:	Not reported	
State Assembly District Code:	46	
State Senate District:	22	

Click this hyperlink while viewing on your computer to access additional CAL-SITES detail in the EDR Site Report.

AWP Facility ID:	19340643
Facility Type:	responsible party
Site Access Controlled :	Not reported
Region Code :	3
Region :	GLENDALE
SMBR Branch Unit:	SO CAL - CYPRESS
SMBR Branch Code :	SB
Site Name. :	Not reported
Current Status Date :	20/01/0628
Current Status :	ANNUAL WORKPLAN - ACTIVE SITE
Lead Agency Code :	DTSC
Lead Agency :	DEPT OF TOXIC SUBSTANCES CONTROL
NPL :	No
Tier Of AWP Site :	Not reported
Source Of Funding :	Not reported
Responsible Staff Member :	DZOGAIB
Supervisor Responsible :	Not reported
Facility SIC :	MANU - FABRICATED METAL PRODUCTS
SIC Code :	34
RWQCB Associated With Site	LOS ANGELES
RWQCB Code :	LA
Site Listed HWS List :	Not reported
Hazard Ranking Score :	Not reported
Date Site Hazard Ranked :	Not reported
Groundwater Contamination :	Not reported
# Of Contamination Sources :	0
Lat/long Method :	Not reported
Description Of Entity :	Not reported
State Assembly Distt Code :	46
State Senate District :	22
Lat/long :	0° 0′ 0″ / 0° 0′ 0″

Map ID / Direction / Distance / Distance (ft.) / Elevation	Site	Database(s)	EDR ID Number / EPA ID Number
P56 NW 1/4-1/2 1795 ft. Relative: Higher Actual: 213 ft.	RENU PLATING CORP 1531 E 32ND ST LOS ANGELES, CA 90011 Site 2 of 3 in cluster P	RCRA-SQG FINDS HAZNET CERC-NFRAP	1000423909 CAD048479497

CERCLIS-NFRAP Classification Data:

Federal Facility:	Not a Federal Facility
Non NPL Code:	NFRAP
NPL Status:	Not on the NPL

CERCLIS-NFRAP Assessment History:

Assessment:	DISCOVERY	Completed:	05/01/1986
Assessment:	PRELIMINARY ASSESSMENT	Completed:	01/01/1987
Assessment:	SITE INSPECTION	Completed:	09/01/1987
Assessment:	ARCHIVE SITE	Completed:	09/01/1987

RCRAInfo:

Owner:	DAVE AND ERIC LICHTBACH MARSHA DENOFF (415) 555-1212
EPA ID:	CAD048479497
Contact:	Not reported
Classification:	Small Quantity Generator
TSDF Activities:	Not reported

Violation Status: No violations found

FINDS:

Other Pertinent Environmental Activity Identified at Site:
RESOURCE CONSERVATION AND RECOVERY ACT INFORMATION SYSTEM

HAZNET:

Gepaid:	CAD048479497
TSD EPA ID:	CAD028409019
Gen County:	Los Angeles
Tsd County:	Los Angeles
Tons:	0.15
Facility Address 2:	Not reported
Waste Category:	Other inorganic solid waste
Disposal Method:	Transfer Station
Contact:	INACTIVE UNDELIVERABLE MAIL
Telephone:	(213) 232-7340
Mailing Name:	Not reported
Mailing Address:	1531 E 32ND ST LOS ANGELES, CA 90011
County	Los Angeles

Map ID / Direction / Distance / Distance (ft.) / Elevation	Site	Database(s)	EDR ID Number / EPA ID Number
P57 NW 1/4-1/2 1795 ft. Relative: Higher Actual: 213 ft.	RENU PLATING COMPANY INC 1531 32ND LOS ANGELES, CA 90011 Site 3 of 3 in cluster P	Cortese	S105024738 N/A

CORTESE:

Region:	CORTESE
Fac Address 2:	Not reported

Map ID / Direction / Distance / Distance (ft.) / Elevation	Site	Database(s)	EDR ID Number / EPA ID Number
O58 North 1/4-1/2 1803 ft. Relative: Higher Actual: 219 ft.	ACTA PARCEL MC-697 EAST 1830 25TH STREET, EAST VERNON, CA Site 2 of 2 in cluster O CA STATE SLIC :	SLIC	S106717789 N/A

Global Id :	SL0603721043
Region :	STATE
Assigned Name :	SLICSITE
Lead Agency Contact :	SU HAN
Lead Agency :	LOS ANGELES RWQCB (REGION 4)
Lead Agency Case Number :	0747P2
Responsible Party :	Not reported
Recent Dtw :	Not reported
Facility Status :	Case Closed
Substance Released :	76

Q59 East 1/4-1/2 2112 ft. Relative: Lower Actual: 207 ft.	AAD 2306 E. 38TH STREET VERNON, CA 90058 Site 1 of 2 in cluster Q CAL-SITES:	Cal-Sites AWP	S106800171 N/A

Facility ID	19000031	
Status:	AWP - ANNUAL WORKPLAN (AWP) - ACTIVE SITE	
Status Date:	11/24/2004	
Lead:	DTSC	
Region:	3 - GLENDALE	
Branch:	SA - SO CAL - GLENDALE	
File Name:	Not reported	
Status Name:	ANNUAL WORKPLAN - ACTIVE SITE	
Lead Agency:	DEPT OF TOXIC SUBSTANCES CONTROL	Not reported
NPL:	Not Listed	
SIC:	00 PROPERTIES THAT DO NOT HAVE SIC CODES	
Facility Type:	STATE	
Type Name:	STATE FUNDED SITE	
Staff Member Responsible for Site:	LPARNASS	
Supervisor Responsible for Site:	Not reported	
Region Water Control Board:	LA - LOS ANGELES	
Access:	Not reported	
Cortese:	Not reported	
Hazardous Ranking Score:	Not reported	
Date Site Hazard Ranked:	Not reported	
Groundwater Contamination:	Not reported	
No. of Contamination Sources:	0	
Lat/Long:	Not reported	
Lat/long Method:	Not reported	
State Assembly District Code:	46	
State Senate District:	22	

Click this hyperlink while viewing on your computer to access additional CAL-SITES detail in the EDR Site Report.

AWP Facility ID:	19000031
Facility Type:	State orphan site
Site Access Controlled :	Not reported
Region Code :	3
Region :	GLENDALE
SMBR Branch Unit:	SO CAL - GLENDALE

AAD (Continued) S106800171

SMBR Branch Code :	SA
Site Name. :	Not reported
Current Status Date :	20/04/1124
Current Status :	ANNUAL WORKPLAN - ACTIVE SITE
Lead Agency Code :	DTSC
Lead Agency :	DEPT OF TOXIC SUBSTANCES CONTROL
NPL :	No
Tier Of AWP Site :	Not reported
Source Of Funding :	Not reported
Responsible Staff Member :	LPARNASS
Supervisor Responsible :	Not reported
Facility SIC :	PROPERTIES THAT DO NOT HAVE SIC CODES
SIC Code :	00
RWQCB Associated With Site	LOS ANGELES
RWQCB Code :	LA
Site Listed HWS List :	Not reported
Hazard Ranking Score :	Not reported
Date Site Hazard Ranked :	Not reported
Groundwater Contamination :	Not reported
# Of Contamination Sources :	0
Lat/long Method :	Not reported
Description Of Entity :	Not reported
State Assembly Distt Code :	46
State Senate District :	22
Lat/long :	0° 0' 0" / 0° 0' 0"

Q60 **A A D DISPOSAL** CERCLIS 1000109893
East **2306 38TH ST** RCRA-LQG CAD981414388
1/4-1/2 **VERNON, CA 90058**
2112 ft.

Site 2 of 2 in cluster Q

Relative: Lower

Actual: 207 ft.

CERCLIS Classification Data:

Federal Facility:	Not a Federal Facility		
Non NPL Status:	PA Ongoing		
NPL Status:	Not on the NPL		
Contact:	Tom J. Dunkelman	Contact Tel:	(415) 972-3044
Contact Title:	Not reported		
Contact:	Jere Johnson	Contact Tel:	(415) 972-3094
Contact Title:	Not reported		
Contact:	DONN ZUROSKI	Contact Tel:	(415) 972-2035
Contact Title:	Not reported		

Site Description: DTSC PA reissued to Weston in 10/04 Site has significant soil and groundwater contamination with PCE and TCE. There are 48 drinking water wells within 4 miles of the site, serving 279,444 people. EPA Emergency Response conducted a drum removal in 2001. DTSC has accessed the company's Environmental Liability Policy and is remediating the site.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION IX 75 Hawthorne Street San Francisco, CA 9 4105 POLLUTION REPORT I. HEADING Date: September 15, 2000 Subject: Vernon AAD Truck Site, Vernon, CA From: Tom Dunkelman, OSC, EPA Region 9 To: Distribution List POLREP No. ONE II. BACKGROUND Site No.: TBD Action Memo Status: Warrant Authority Response Authority: CERCLA Start Date: 09/13/2000 Delivery Order No.: 9970 Demobilization Date: TBD NPL Status: Non-NPL Completion Date: TBD III. SITE INFORMATION A. Incident Category Emergen cy Response B. Site Description The Site consists of two trucks

A A D DISPOSAL (Continued) 1000109893

parked on city streets which contains drums of tetracholoroethylene ("perchloroethylene" or "perc") and petroleum distillate wastes. One truck, located on 37th St, has been parked on the city street for at least two weeks. An inventory (non-entry) of the contents of the truck was previously conducted by State personnel in which a total of 80 drums were identified. The drums were noted to be in deteriorating condition and app ear to have been abandoned. Manifests were found inside the truck only for ten drums of petroleum distillate waste from Rite Choice Parts and Washers LLC. The Manifests were dated 5/00. Other drums inside the truck immediately visible appeared to contain perchloroethylene. The Site is not approved for storage of hazardous waste nor is there secondary containment or other means to control possible release and off-site migration of the PERC. A seco nd truck is located on Irving St. This truck was the subject of an emergency response conducted on September 8, 2000 by the Vernon Fire Department and by AAD Distribution and Dry Cleaning Services Inc. (AAD). The truck was observed to be releasing liquids onto the city streets as it exited the AAD facility. The spilled material was later confirmed to contain perchloroethylene. The Vernon Fire Department and AAD Disposal subsequently conducted an emergency response action to address the mate rial spilled on to the street. C. Preliminary Assessment/Site Inspection Results A removal site assessment was conducted by FOSC Dunkelman and START personnel. Based on information obtained from drums labels, hazardous waste manifests and samp ling results from the spilled material (results provided by CA DTSC), it is believed that the majority of the drums in the trucks contain perchloroethylene. The drums are stored in the trucks in an unsafe manner and many of the drums have been obser ved to be leaking. FOSC Dunkelman determined that Site conditions were not stabilized and controlled, and that an imminent and substantial endangerment to public health and the environment existed IV. RESPONSE INFORMATION A. Situation 1.Current situation 9/12 weather: hot Personnel: 1 EPA, 2 START, 2 DTSC Activities: OSC Dunkelman and START were onsite to oversee the cleanup of the two trucks. AAD had informed EPA on 9/11 they would conduct the cleanup of the trucks and their contents. A AD had hired a cleanup contractor to do the drum handling and transportation. The cleanup contractor advised AAD he was unwilling to transport the waste to AAD since he felt there was no room on the facility for the waste. At that time AAD indicate d they would transport the waste themselves and use the contractor only for handling the drums. As the contractor began to prepare to conduct the work, OSC Dunkelman asked for a Health and Safety Plan. The contractor had neither a verba l nor a written plan, and did not know basic information such as the PEL or IDLH values for perc. In addition, the contractor had no air monitoring equipment capable of detecting perc or any organic vapors. Furthermore, the contractor had no Level B equipment in the event of a spill. At that time OSC Dunkelman informed AAD that the contractor was not capable of performing the work, and that EPA would be performing the work. OSC Dunkelman initiated a response action under Warrant Authority. 9/13 weather: hot Personnel: 1 EPA, 4 CET, 2 START, 2 DTSC, Vernon Health Dept, Vernon Fire Dept. Activities: CET arrived onsite and began preparations to offload drums from trucks, overpack drums and transport the drums to an appropriate faci lity. Vernon Health Deparment and Fire Department conducted an emergency response at the AAD facility, in response to a leaking drum. 9/14 weather: hot Personnel: 1 EPA, 5 CET, 1 START, 2 DTSC, Vernon Health

A A D DISPOSAL (Continued) 1000109893

Fire and Police Activities: All o f the drums on the truck on Irving St. and approximately one third of the drums on the truck on 37th St. were removed from the trucks, overpacked as necessary, and loaded onto a truck for offsite transport and disposal. The Vernon Health Department, Fire and Police provided logistical support including traffic control. DTSC personnel were onsite providing technical assistance. 9/15 weather: hot Personnel: 1 EPA, 5 CET, 1 START, 2 DTSC, Vernon Fire, Vernon Police. Activities: All of the remaining drums on the truck on 37th St. were removed from the truck, overpacked as necessary, and loaded onto a truck for offsite transport and disposal. The Fire and Police provided logistical support including traffic control. DTSC perso nnel were onsite providing technical assistance. EPA, CET and START demobed from the site. B. Planned Removal Activities EPA will remove of all drums from the two trucks, overpack the drums as necessary, and provide for offsite
transportation and disposal at an appropriate facility. C. Key Issues The generator of this waste is an active TSD facility recycling dry cleaning wastes. Operations are being conducted in a manner which poses an imminent and substantial endangerment to the public health and the environment. This Site is one of at least four AAD Sites currently being responded to, and it is expected that continued operations by this operator will produce additional response actions. V. COST INFORMA TION Estimated Cost Ceiling CET N/A $100,000 EPA N/A $ 30,000 START N/A $ 40,000 VI. DISPOSITION OF WASTES Material Date Volume Destination* waste tetrachloroethylene 9/14 66 drums Safety Clean, Aragonite, UT waste tetrachloroethylene 9/15 68 drums Safety Clean, Aragonite, UT * destination is subject to waste acceptance at facility VII. STATUS Case Pends. OSC Tom Dunkelman, phone 415-744-2294 This was a removal site, but further work was needed. Assigned to DTSC to do PA with approval of OSC Tom Dunkelman. J. Johnson 2/19/02 UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION IX 75 Hawthorne Street San Francisco, CA 94105 POLLUTION REPORT I. HEADING Date: September 15, 2000 Subject: Ve rnon AAD Truck Site, Vernon, CA From: Tom Dunkelman, OSC, EPA Region 9 To: Distribution List POLREP No. ONE II. BACKGROUND Site No.: TBD Action Memo Status: Warrant Authority Response Authority: CERCLA Start Date : 09/13/2000 Delivery Order No.: 9970 Demobilization Date: TBD NPL Status: Non-NPL Completion Date: TBD III. SITE INFORMATION A. Incident Category Emergency Response B. Site Description The Site consists of two trucks parked on city s treets which contains drums of tetracholoroethylene ("perchloroethylene" or "perc") and petroleum distillate wastes. One truck, located on 37th St, has been parked on the city street f
or at least two weeks. An inventory (non-entry) of the contents of the truck was previously conducted by State personnel in which a total of 80 drums were identified The drums were noted to be in deteriorating condition and appear to have been ab andoned. Manifests were found inside the truck only for ten drums of petroleum distillate waste from Rite Choice Parts and Washers LLC. The Manifests were dated 5/00. Other drums inside the truck immediately visible appeared to contain perchloroet hylene. The Site is not approved for storage of hazardous waste nor is there secondary containment or other means to control possible release and off-site migration of the PERC. A second truck is located on Irving St. This truck was the subject of

A A D DISPOSAL (Continued) 1000109893

an emergency response conducted on September 8, 2000 by the Vernon Fire Department and by AAD Distribution and Dry Cleaning Services Inc. (AAD). The truck was observed to be releasing liquids onto the city streets as it exited the AAD facility. The spilled material was later confirmed to contain perchloroethylene. The Vernon Fire Department and AAD Disposal subsequently conducted an emergency response action to address the material spilled on to the street. C. Preliminary Assessment /Site Inspection Results A removal site assessment was conducted by FOSC Dunkelman and START personnel. Based on information obtained from drums labels, hazardous waste manifests and sampling results from the spilled material (results provided by CA DTSC), it is believed that the majority of the drums in the trucks contain perchloroethylene. The drums are stored in the trucks in an unsafe manner and many of the drums have been observed to be leaking. FOSC Dunkelman determined that Site condit lons were not stabilized and controlled, and that an Imminent and substantial endangerment to public health and the environment existed IV. RESPONSE INFORMATION A. Situation 1.Current situation 9/12 weather: hot Personnel: 1 EPA, 2
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A A D DISPOSAL (Continued) 1000109893

B. Planned Removal Activities EPA will remove of all drums from the two trucks, overpack the drums as necessary, and provide for offsite transportation and disposal at an appropriate facility. C. K ey Issues The generator of this waste is an active TSD facility recycling dry cleaning wastes. Operations are being conducted in a manner which poses an imminent and substantial endangerment to the public health and the environment. This Site is one of at least four AAD Sites currently being responded to, and it is expected that continued operations by this operator will produce additional response actions. V. COST INFORMATION Estimated Cost Ceiling CET N/A $100,000 EPA N/A $ 30,000 ST ART N/A $ 40,000 VI. DISPOSITION OF WASTES Material Date Volume Destination* waste tetrachloroethylene 9/14 66 drums Safety Clean, Aragonite, UT waste tetrachloroethylene 9/15 68 drums Safety Clean, Aragonite, UT * destination is subject to waste acceptance at facility VII. STATUS Case Pends. OSC Tom Dunkelman, phone 415-744-2294 2/26/04: Spec Initiative data error

CERCLIS Assessment History:

Assessment:	DISCOVERY	Completed:	09/28/2000
Assessment:	REMOVAL	Completed:	02/23/2001
Assessment:	SETTLEMENT (GENERIC)	Completed:	06/09/2002
Assessment:	PRELIMINARY ASSESSMENT	Completed:	12/16/2002

CERCLIS Site Status:
High

CERCLIS Alias Name(s):
AAD DISPOSAL

RCRAInfo:

Owner:	NOT REQUIRED (415) 555-1212
EPA ID:	CAD981414386
Contact:	Not reported
Classification:	Large Quantity Generator
TSDF Activities:	Not reported

Violation Status: No violations found

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61 NE 1/2-1 4549 ft.
Relative: Higher
Actual: 224 ft.

AMTRAK
2435 E WASHINGTON BLVD
LOS ANGELES, CA 90021

Cal-Sites S101586462
AWP N/A
CA FID UST
CA WDS
SWEEPS UST

CAL-SITES:

Facility ID	19400012	
Status:	AWP - ANNUAL WORKPLAN (AWP) - ACTIVE SITE	
Status Date:	01/10/2003	
Lead:	DTSC	
Region:	3 - GLENDALE	
Branch:	SA - SO CAL - GLENDALE	
File Name:	AMTRAK REDONDO JUNCTION FACILITY	
Status Name:	ANNUAL WORKPLAN - ACTIVE SITE	
Lead Agency:	DEPT OF TOXIC SUBSTANCES CONTROL	Not reported
NPL:	Not Listed	
SIC:	40 RAILROAD TRANSPORTATION	
Facility Type:	RP	
Type Name:	RESPONSIBLE PARTY	
Staff Member Responsible for Site:	JSEVREAN	

AMTRAK (Continued) **S101586462**

Supervisor Responsible for Site:	Not reported
Region Water Control Board:	Not reported
Access:	Controlled
Cortese:	C
Hazardous Ranking Score:	Not reported
Date Site Hazard Ranked:	Not reported
Groundwater Contamination:	Not reported
No. of Contamination Sources:	0
Lat/Long:	Not reported
Lat/long Method:	Not reported
State Assembly District Code:	46
State Senate District:	22

Click this hyperlink while viewing on your computer to access additional CAL-SITES detail in the EDR Site Report.

AWP Facility ID:	19400012
Facility Type:	responsible party
Site Access Controlled :	Controlled
Region Code :	3
Region :	GLENDALE
SMBR Branch Unit:	SO CAL - GLENDALE
SMBR Branch Code :	SA
Site Name. :	AMTRAK REDONDO JUNCTION FACILITY
Current Status Date :	20/03/0110
Current Status :	ANNUAL WORKPLAN - ACTIVE SITE
Lead Agency Code :	DTSC
Lead Agency :	DEPT OF TOXIC SUBSTANCES CONTROL
NPL :	No
Tier Of AWP Site :	Not reported
Source Of Funding :	Not reported
Responsible Staff Member :	JSEVREAN
Supervisor Responsible :	Not reported
Facility SIC :	RAILROAD TRANSPORTATION
SIC Code :	40
RWQCB Associated With Site	Not reported
RWQCB Code :	Not reported
Site Listed HWS List :	Not reported
Hazard Ranking Score :	Not reported
Date Site Hazard Ranked :	Not reported
Groundwater Contamination :	Not reported
# Of Contamination Sources :	0
Lat/long Method :	Not reported
Description Of Entity :	Not reported
State Assembly Distt Code :	46
State Senate District :	22
Lat/long :	0° 0' 0" / 0° 0' 0"

AMTRAK (Continued) S101586462

FID:

Facility ID:	19050922	Regulate ID:	00061169
Reg By:	Inactive Underground Storage Tank Location		
Cortese Code:	Not reported	SIC Code:	Not reported
Status:	Inactive	Facility Tel:	(213) 683-6950
Mail To:	Not reported 400 NW N CAPITOL ST LOS ANGELES, CA 90021		
Contact:	Not reported	Contact Tel:	Not reported
DUNs No:	Not reported	NPDES No:	Not reported
Creation:	10/22/93	Modified:	00/00/00
EPA ID:	Not reported		
Comments:	Not reported		

WDS:

Facility ID:	4 191014242		
Facility Contact	PETERSON, SHELDON	Facility Telephone	(213) 891-3561
SIC Code:	Not reported	SIC Code 2:	Not reported
Agency Name:	NATIONAL RAILROAD PASSENGER		
Agency Address:	2468 E 16th St Los Angeles 90021 - 2915		
Agency Contact:	HEDGES, LYNN	Agency Phone:	(213) 683-6990
Design Flow:	Not reported	Baseline Flow:	Not reported
Facility Type:	Industrial - Facility that treats and/or disposes of liquid or semisolid wastes from any servicing, producing, manufacturing or processing operation of whatever nature, including mining, gravel washing, geothermal operations, air conditioning, ship building and repairing, oil production, storage and disposal operations, water pumping.		
Facility Status:	Active - Any facility with a continuous or seasonal discharge that is under Waste Discharge Requirements.		
Agency Type:	?		
Waste Type:	Not reported		
Threat to Water:	Minor Threat to Water Quality. A violation of a regional board order should cause a relatively minor impairment of beneficial uses compared to a major or minor threat. Not: All nurds without a TTWQ will be considered a minor threat to water quality unless coded at a higher Level. A Zero (0) may be used to code those NURDS that are found to represent no threat to water quality.		
Complexity:	Category C - Facilities having no waste treatment systems, such as cooling water dischargers or thosewho must comply through best management practices, facilities with passive waste treatment and disposal systems, such as septic systems with subsurface disposal, or dischargers having waste storage systems with land disposal such as dairy waste ponds.		
Reclamation:	Not reported		
POTW:	Not reported		
NPDES Number:	CAS000001 The 1st 2 characters designate the state. The remaining 7 are assigned by the Regional Board		
Subregion:	4		

SWEEPS:

Status :	Not reported
Comp Number :	3349
Number :	Not reported
Board Of Equalization :	44-012951
Ref Date :	Not reported
Act Date :	Not reported
Created Date :	Not reported
Tank Status :	Not reported
Owner Tank Id :	Not reported
Swrcb Tank Id :	19-050-003349-000001

AMTRAK (Continued) S101586462

Actv Date : Not reported
Capacity : 30000
Tank Use : CHEMICAL
Stg : PRODUCT
Content : UNKNOWN
Number Of Tanks : 13

Status : Not reported
Comp Number : 3349
Number : Not reported
Board Of Equalization : 44-012951
Ref Date : Not reported
Act Date : Not reported
Created Date : Not reported
Tank Status : Not reported
Owner Tank Id : Not reported
Swrcb Tank Id : 19-050-003349-000002
Actv Date : Not reported
Capacity : 30000
Tank Use : CHEMICAL
Stg : PRODUCT
Content : UNKNOWN
Number Of Tanks : Not reported

Status : Not reported
Comp Number : 3349
Number : Not reported
Board Of Equalization : 44-012951
Ref Date : Not reported
Act Date : Not reported
Created Date : Not reported
Tank Status : Not reported
Owner Tank Id : Not reported
Swrcb Tank Id : 19-050-003349-000003
Actv Date : Not reported
Capacity : 30000
Tank Use : CHEMICAL
Stg : PRODUCT
Content : UNKNOWN
Number Of Tanks : Not reported

Status : Not reported
Comp Number : 3349
Number : Not reported
Board Of Equalization : 44-012951
Ref Date : Not reported
Act Date : Not reported
Created Date : Not reported
Tank Status : Not reported
Owner Tank Id : Not reported
Swrcb Tank Id : 19-050-003349-000004
Actv Date : Not reported
Capacity : 30000
Tank Use : CHEMICAL
Stg : PRODUCT
Content : UNKNOWN
Number Of Tanks : Not reported

AMTRAK (Continued) S101586462

Status : Not reported
Comp Number : 3349
Number : Not reported
Board Of Equalization : 44-012951
Ref Date : Not reported
Act Date : Not reported
Created Date : Not reported
Tank Status : Not reported
Owner Tank Id : Not reported
Swrcb Tank Id : 19-050-003349-000005
Actv Date : Not reported
Capacity : 30000
Tank Use : CHEMICAL
Stg : PRODUCT
Content : UNKNOWN
Number Of Tanks : Not reported

Status : Not reported
Comp Number : 3349
Number : Not reported
Board Of Equalization : 44-012951
Ref Date : Not reported
Act Date : Not reported
Created Date : Not reported
Tank Status : Not reported
Owner Tank Id : Not reported
Swrcb Tank Id : 19-050-003349-000006
Actv Date : Not reported
Capacity : 30000
Tank Use : CHEMICAL
Stg : PRODUCT
Content : UNKNOWN
Number Of Tanks : Not reported

Status : Not reported
Comp Number : 3349
Number : Not reported
Board Of Equalization : 44-012951
Ref Date : Not reported
Act Date : Not reported
Created Date : Not reported
Tank Status : Not reported
Owner Tank Id : Not reported
Swrcb Tank Id : 19-050-003349-000007
Actv Date : Not reported
Capacity : 200000
Tank Use : CHEMICAL
Stg : PRODUCT
Content : UNKNOWN
Number Of Tanks : Not reported

Status : Not reported
Comp Number : 3349
Number : Not reported
Board Of Equalization : 44-012951
Ref Date : Not reported

AMTRAK (Continued) S101586462

Act Date : Not reported
Created Date : Not reported
Tank Status : Not reported
Owner Tank Id : Not reported
Swrcb Tank Id : 19-050-003349-000008
Actv Date : Not reported
Capacity : 19650
Tank Use : M.V. FUEL
Stg : PRODUCT
Content : DIESEL
Number Of Tanks : Not reported

Status : Not reported
Comp Number : 3349
Number : Not reported
Board Of Equalization : 44-012951
Ref Date : Not reported
Act Date : Not reported
Created Date : Not reported
Tank Status : Not reported
Owner Tank Id : Not reported
Swrcb Tank Id : 19-050-003349-000009
Actv Date : Not reported
Capacity : 2500
Tank Use : CHEMICAL
Stg : PRODUCT
Content : UNKNOWN
Number Of Tanks : Not reported

Status : Not reported
Comp Number : 3349
Number : Not reported
Board Of Equalization : 44-012951
Ref Date : Not reported
Act Date : Not reported
Created Date : Not reported
Tank Status : Not reported
Owner Tank Id : Not reported
Swrcb Tank Id : 19-050-003349-000010
Actv Date : Not reported
Capacity : 2000
Tank Use : M.V. FUEL
Stg : PRODUCT
Content : DIESEL
Number Of Tanks : Not reported

Status : Not reported
Comp Number : 3349
Number : Not reported
Board Of Equalization : 44-012951
Ref Date : Not reported
Act Date : Not reported
Created Date : Not reported
Tank Status : Not reported
Owner Tank Id : Not reported
Swrcb Tank Id : 19-050-003349-000011
Actv Date : Not reported

AMTRAK (Continued) S101586462

Capacity : 5000
Tank Use : CHEMICAL
Stg : PRODUCT
Content : UNKNOWN
Number Of Tanks : Not reported

Status : Not reported
Comp Number : 3349
Number : Not reported
Board Of Equalization : 44-012951
Ref Date : Not reported
Act Date : Not reported
Created Date : Not reported
Tank Status : Not reported
Owner Tank Id : Not reported
Swrcb Tank Id : 19-050-003349-000012
Actv Date : Not reported
Capacity : 5000
Tank Use : CHEMICAL
Stg : PRODUCT
Content : UNKNOWN
Number Of Tanks : Not reported

Status : Not reported
Comp Number : 3349
Number : Not reported
Board Of Equalization : 44-012951
Ref Date : Not reported
Act Date : Not reported
Created Date : Not reported
Tank Status : Not reported
Owner Tank Id : Not reported
Swrcb Tank Id : 19-050-003349-000013
Actv Date : Not reported
Capacity : 5000
Tank Use : CHEMICAL
Stg : PRODUCT
Content : UNKNOWN
Number Of Tanks : Not reported

ORPHAN SUMMARY

City	EDR ID	Site Name	Site Address	Zip	Database(s)
LOS ANGELES	2005704998	2600 E 28TH STREET	2600 E 28TH STREET		HMIRS
LOS ANGELES	1009077930	MARA E C	1010 W 40TH PL		EDR Historical Auto Stations
LOS ANGELES	1007442156	LANCER SITE	41ST AND ALAMEDA		US BROWNFIELDS
LOS ANGELES	S106487294	THE E.B. MALONE CORPORATION	306-360 AVENUE 26		SLIC
LOS ANGELES	1009084242	LANSING W E	3858 BAYWAY PL		EDR Historical Auto Stations
LOS ANGELES	1009080149	LONG H E	3727 BAYWAY PL		EDR Historical Auto Stations
LOS ANGELES	1009080062	HARTMAN E C	3858 BAYWAY PL		EDR Historical Auto Stations
LOS ANGELES	1009187258	BONES PLACE	424 BEACON ST		EDR Historical Cleaners
LOS ANGELES	1009078403	MC CORMICK W E	3000 BEAUDRY BLVD		EDR Historical Auto Stations
LOS ANGELES	1009080327	WAGSTAFF G E	8625 BEVERLY BLVD		EDR Historical Auto Stations
LOS ANGELES	1009187685	RUCKER R E	465 S BIXEL ST		EDR Historical Cleaners
LOS ANGELES	1009078675	BROWN E J	3009 BROOKLYN AVE		EDR Historical Auto Stations
LOS ANGELES	1009080522	RUDEY E D	1601 S CENTRAL AVE		EDR Historical Auto Stations
LOS ANGELES	1009077417	BEIGE E J	3801 S CENTRAL AVE		EDR Historical Auto Stations
LOS ANGELES	1009079103	HECHLER E C	810 S CENTRAL AVE		EDR Historical Auto Stations
LOS ANGELES	1009080031	SPEARS R E	1629 S CENTRAL AVE		EDR Historical Auto Stations
LOS ANGELES	1009077633	ENCELL C E	729 S CENTRAL AVE		EDR Historical Auto Stations
LOS ANGELES	1009076479	FIELDS T E	3907 S CENTRAL AVE		EDR Historical Auto Stations
LOS ANGELES	1009190079	BACK E	5924 1/2 S CENTRAL AVE		EDR Historical Cleaners
LOS ANGELES	1009079951	GRIEWE R E	1646 EL CENTRO ST		EDR Historical Auto Stations
LOS ANGELES	1009187396	JUAREZ E C	709 CLARAY DR		EDR Historical Cleaners
LOS ANGELES	1003109110	SAFE WAY CLEANERS	6318 SOUTH COMPTON AVENUE	90011	CERCLIS, FINDS
LOS ANGELES	1009080532	ROBERTS E H	2520 CONCORD AVE		EDR Historical Auto Stations
LOS ANGELES	1009191009	MC DONALD J E	1347 CROWN HILL AVE		EDR Historical Cleaners
LOS ANGELES	1009186118	MC DONNELL J E	1402 CROWN HILL AVE		EDR Historical Cleaners
LOS ANGELES	1009192336	BROWN F E	902 N SOTO ST		EDR Historical Cleaners
LOS ANGELES	1009084269	WARD R E	817 W STA BAR AV		EDR Historical Auto Stations
LOS ANGELES	1009190854	DE FORD I E MRS	1511 W STA BAR AV		EDR Historical Cleaners
LOS ANGELES	1009080456	OHARA E F	2300 W STA BAR AV		EDR Historical Auto Stations
LOS ANGELES	1009191658	WALTERS R E	1303 S SUNSET BLVD		EDR Historical Cleaners
LOS ANGELES	1009078808	RICHARDSON C E	4494 TELEGRAPH RD		EDR Historical Auto Stations
LOS ANGELES	1009082292	CHASSE D E	3601 TEMPLE AL		EDR Historical Auto Stations
LOS ANGELES	1009079824	BUNCH E J	3501 TEMPLE AL		EDR Historical Auto Stations
LOS ANGELES	1007091338	AAD DISTRIBUTION & DRY CLEANING SE	2306 E THIRTY EIGHTH ST	90058	RCRA-LQG, RCRA-TSDF, CORRACT
LOS ANGELES	1009078995	COLE F E	4750 TOWNSEND AVE		EDR Historical Auto Stations
LOS ANGELES	1009081838	BIERHAUS L E	60738388409 S UNION AV		EDR Historical Auto Stations
LOS ANGELES	8719855	VALL;EY BLVD + E 20TH ST	VALL;EY BLVD + E 20TH ST		ERNS
LOS ANGELES	1009191981	PERKINS E W	1677 VENICE BLVD		EDR Historical Cleaners
LOS ANGELES	8873114	WB VENTURA HWY/1/2MI E OF FOREST L	WB VENTURA HWY/1/2MI E OF FORE		ERNS
LOS ANGELES	1009079541	CUMMINS H E	4103 VERDUGO RD		EDR Historical Auto Stations
LOS ANGELES	1009078520	PLIMPTON J E	3426 VERDUGO RD		EDR Historical Auto Stations
LOS ANGELES	1009081529	BATES H E	3861 VERDUGO RD		EDR Historical Auto Stations

GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

To maintain currency of the following federal and state databases, EDR contacts the appropriate governmental agency on a monthly or quarterly basis, as required.

Number of Days to Update: Provides confirmation that EDR is reporting records that have been updated within 90 days from the date the government agency made the information available to the public.

FEDERAL RECORDS

NPL: National Priority List

National Priorities List (Superfund). The NPL is a subset of CERCLIS and identifies over 1,200 sites for priority cleanup under the Superfund Program. NPL sites may encompass relatively large areas. As such, EDR provides polygon coverage for over 1,000 NPL site boundaries produced by EPA's Environmental Photographic Interpretation Center (EPIC) and regional EPA offices.

Date of Government Version: 02/24/2006
Date Data Arrived at EDR: 03/01/2006
Date Made Active in Reports: 03/31/2006
Number of Days to Update: 30

Source: EPA
Telephone: N/A
Last EDR Contact: 03/01/2006
Next Scheduled EDR Contact: 05/01/2006
Data Release Frequency: Quarterly

NPL Site Boundaries

Sources:

EPA's Environmental Photographic Interpretation Center (EPIC)
Telephone: 202-564-7333

EPA Region 1
Telephone 617-918-1143

EPA Region 6
Telephone: 214-655-6659

EPA Region 3
Telephone 215-814-5418

EPA Region 8
Telephone: 303-312-6774

EPA Region 4
Telephone 404-562-8033

Proposed NPL: Proposed National Priority List Sites

Date of Government Version: 02/24/2006
Date Data Arrived at EDR: 03/01/2006
Date Made Active in Reports: 03/31/2006
Number of Days to Update: 30

Source: EPA
Telephone: N/A
Last EDR Contact: 03/01/2006
Next Scheduled EDR Contact: 05/01/2006
Data Release Frequency: Quarterly

DELISTED NPL: National Priority List Deletions

The National Oil and Hazardous Substances Pollution Contingency Plan (NCP) establishes the criteria that the EPA uses to delete sites from the NPL. In accordance with 40 CFR 300.425.(e), sites may be deleted from the NPL where no further response is appropriate.

Date of Government Version: 02/24/2006
Date Data Arrived at EDR: 03/01/2006
Date Made Active in Reports: 03/31/2006
Number of Days to Update: 30

Source: EPA
Telephone: N/A
Last EDR Contact: 03/01/2006
Next Scheduled EDR Contact: 05/01/2006
Data Release Frequency: Quarterly

NPL RECOVERY: Federal Superfund Liens

Federal Superfund Liens. Under the authority granted the USEPA by CERCLA of 1980, the USEPA has the authority to file liens against real property in order to recover remedial action expenditures or when the property owner received notification of potential liability. USEPA compiles a listing of filed notices of Superfund Liens.

Date of Government Version: 10/15/1991
Date Data Arrived at EDR: 02/02/1994
Date Made Active in Reports: 03/30/1994
Number of Days to Update: 56

Source: EPA
Telephone: 202-564-4267
Last EDR Contact: 03/06/2006
Next Scheduled EDR Contact: 05/22/2006
Data Release Frequency: No Update Planned

GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

CERCLIS: Comprehensive Environmental Response, Compensation, and Liability Information System

CERCLIS contains data on potentially hazardous waste sites that have been reported to the USEPA by states, municipalities, private companies and private persons, pursuant to Section 103 of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). CERCLIS contains sites which are either proposed to or on the National Priorities List (NPL) and sites which are in the screening and assessment phase for possible inclusion on the NPL.

Date of Government Version: 02/01/2006
Date Data Arrived at EDR: 03/21/2006
Date Made Active in Reports: 04/13/2006
Number of Days to Update: 23

Source: EPA
Telephone: 703-413-0223
Last EDR Contact: 03/21/2006
Next Scheduled EDR Contact: 06/19/2006
Data Release Frequency: Quarterly

CERCLIS-NFRAP: CERCLIS No Further Remedial Action Planned

Archived sites are sites that have been removed and archived from the inventory of CERCLIS sites. Archived status indicates that, to the best of EPA's knowledge, assessment at a site has been completed and that EPA has determined no further steps will be taken to list this site on the National Priorities List (NPL), unless information indicates this decision was not appropriate or other considerations require a recommendation for listing at a later time. This decision does not necessarily mean that there is no hazard associated with a given site; it only means that, based upon available information, the location is not judged to be a potential NPL site.

Date of Government Version: 02/01/2006
Date Data Arrived at EDR: 03/21/2006
Date Made Active in Reports: 04/13/2006
Number of Days to Update: 23

Source: EPA
Telephone: 703-413-0223
Last EDR Contact: 03/21/2006
Next Scheduled EDR Contact: 06/19/2006
Data Release Frequency: Quarterly

CORRACTS: Corrective Action Report

CORRACTS identifies hazardous waste handlers with RCRA corrective action activity.

Date of Government Version: 03/15/2006
Date Data Arrived at EDR: 03/17/2006
Date Made Active in Reports: 04/13/2006
Number of Days to Update: 27

Source: EPA
Telephone: 800-424-9346
Last EDR Contact: 03/06/2006
Next Scheduled EDR Contact: 06/05/2006
Data Release Frequency: Quarterly

RCRA: Resource Conservation and Recovery Act Information

RCRAInfo is EPA's comprehensive information system, providing access to data supporting the Resource Conservation and Recovery Act (RCRA) of 1976 and the Hazardous and Solid Waste Amendments (HSWA) of 1984. RCRAInfo replaces the data recording and reporting abilities of the Resource Conservation and Recovery Information System (RCRIS). The database includes selective information on sites which generate, transport, store, treat and/or dispose of hazardous waste as defined by the Resource Conservation and Recovery Act (RCRA). Conditionally exempt small quantity generators (CESQGs) generate less than 100 kg of hazardous waste, or less than 1 kg of acutely hazardous waste per month. Small quantity generators (SQGs) generate between 100 kg and 1,000 kg of hazardous waste per month. Large quantity generators (LQGs) generate over 1,000 kilograms (kg) of hazardous waste, or over 1 kg of acutely hazardous waste per month. Transporters are individuals or entities that move hazardous waste from the generator off-site to a facility that can recycle, treat, store, or dispose of the waste. TSDFs treat, store, or dispose of the waste.

Date of Government Version: 02/21/2006
Date Data Arrived at EDR: 03/01/2006
Date Made Active in Reports: 03/31/2006
Number of Days to Update: 30

Source: EPA
Telephone: 800-424-9346
Last EDR Contact: 03/01/2006
Next Scheduled EDR Contact: 04/24/2006
Data Release Frequency: Quarterly

ERNS: Emergency Response Notification System

Emergency Response Notification System. ERNS records and stores information on reported releases of oil and hazardous substances.

Date of Government Version: 12/31/2005
Date Data Arrived at EDR: 01/12/2006
Date Made Active in Reports: 02/21/2006
Number of Days to Update: 40

Source: National Response Center, United States Coast Guard
Telephone: 202-260-2342
Last EDR Contact: 01/12/2006
Next Scheduled EDR Contact: 04/24/2006
Data Release Frequency: Annually

GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

HMIRS: Hazardous Materials Information Reporting System
Hazardous Materials Incident Report System. HMIRS contains hazardous material spill incidents reported to DOT.

Date of Government Version: 12/31/2005
Date Data Arrived at EDR: 01/16/2006
Date Made Active in Reports: 02/21/2006
Number of Days to Update: 36

Source: U.S. Department of Transportation
Telephone: 202-366-4555
Last EDR Contact: 04/14/2006
Next Scheduled EDR Contact: 07/17/2006
Data Release Frequency: Annually

US ENG CONTROLS: Engineering Controls Sites List
A listing of sites with engineering controls in place. Engineering controls include various forms of caps, building foundations, liners, and treatment methods to create pathway elimination for regulated substances to enter environmental media or effect human health.

Date of Government Version: 08/02/2005
Date Data Arrived at EDR: 08/12/2005
Date Made Active in Reports: 10/06/2005
Number of Days to Update: 55

Source: Environmental Protection Agency
Telephone: 703-603-8905
Last EDR Contact: 03/03/2006
Next Scheduled EDR Contact: 07/03/2006
Data Release Frequency: Varies

US INST CONTROL: Sites with Institutional Controls
A listing of sites with institutional controls in place. Institutional controls include administrative measures, such as groundwater use restrictions, construction restrictions, property use restrictions, and post remediation care requirements intended to prevent exposure to contaminants remaining on site. Deed restrictions are generally required as part of the institutional controls.

Date of Government Version: 01/10/2005
Date Data Arrived at EDR: 02/11/2005
Date Made Active in Reports: 04/06/2005
Number of Days to Update: 54

Source: Environmental Protection Agency
Telephone: 703-603-8905
Last EDR Contact: 03/03/2006
Next Scheduled EDR Contact: 07/03/2006
Data Release Frequency: Varies

DOD: Department of Defense Sites
This data set consists of federally owned or administered lands, administered by the Department of Defense, that have any area equal to or greater than 640 acres of the United States, Puerto Rico, and the U.S. Virgin Islands.

Date of Government Version: 12/31/2004
Date Data Arrived at EDR: 02/08/2005
Date Made Active in Reports: 08/04/2005
Number of Days to Update: 177

Source: USGS
Telephone: 703-692-8801
Last EDR Contact: 02/06/2006
Next Scheduled EDR Contact: 05/08/2006
Data Release Frequency: Semi-Annually

FUDS: Formerly Used Defense Sites
The listing includes locations of Formerly Used Defense Sites properties where the US Army Corps of Engineers is actively working or will take necessary cleanup actions.

Date of Government Version: 12/05/2005
Date Data Arrived at EDR: 01/19/2006
Date Made Active in Reports: 02/21/2006
Number of Days to Update: 33

Source: U.S. Army Corps of Engineers
Telephone: 202-528-4285
Last EDR Contact: 04/03/2006
Next Scheduled EDR Contact: 07/03/2006
Data Release Frequency: Varies

US BROWNFIELDS: A Listing of Brownfields Sites

Included in the listing are brownfields properties addresses by Cooperative Agreement Recipients and brownfields properties addressed by Targeted Brownfields Assessments. Targeted Brownfields Assessments-EPA's Targeted Brownfields Assessments (TBA) program is designed to help states, tribes, and municipalities--especially those without EPA Brownfields Assessment Demonstration Pilots--minimize the uncertainties of contamination often associated with brownfields. Under the TBA program, EPA provides funding and/or technical assistance for environmental assessments at brownfields sites throughout the country. Targeted Brownfields Assessments supplement and work with other efforts under EPA's Brownfields Initiative to promote cleanup and redevelopment of brownfields. Cooperative Agreement Recipients-States, political subdivisions, territories, and Indian tribes become Brownfields Cleanup Revolving Loan Fund (BCRLF) cooperative agreement recipients when they enter into BCRLF cooperative agreements with the U.S. EPA. EPA selects BCRLF cooperative agreement recipients based on a proposal and application process. BCRLF cooperative agreement recipients must use EPA funds provided through BCRLF cooperative agreement for specified brownfields-related cleanup activities.

Date of Government Version: 11/29/2005
Date Data Arrived at EDR: 12/05/2005
Date Made Active in Reports: 01/30/2006
Number of Days to Update: 56

Source: Environmental Protection Agency
Telephone: 202-566-2777
Last EDR Contact: 03/13/2006
Next Scheduled EDR Contact: 06/12/2006
Data Release Frequency: Semi-Annually

CONSENT: Superfund (CERCLA) Consent Decrees

Major legal settlements that establish responsibility and standards for cleanup at NPL (Superfund) sites. Released periodically by United States District Courts after settlement by parties to litigation matters.

Date of Government Version: 12/14/2004
Date Data Arrived at EDR: 02/15/2005
Date Made Active in Reports: 04/25/2005
Number of Days to Update: 69

Source: Department of Justice, Consent Decree Library
Telephone: Varies
Last EDR Contact: 03/13/2006
Next Scheduled EDR Contact: 07/24/2006
Data Release Frequency: Varies

ROD: Records Of Decision

Record of Decision. ROD documents mandate a permanent remedy at an NPL (Superfund) site containing technical and health information to aid in the cleanup.

Date of Government Version: 12/07/2005
Date Data Arrived at EDR: 01/06/2006
Date Made Active in Reports: 02/21/2006
Number of Days to Update: 46

Source: EPA
Telephone: 703-416-0223
Last EDR Contact: 04/05/2006
Next Scheduled EDR Contact: 07/03/2006
Data Release Frequency: Annually

UMTRA: Uranium Mill Tailings Sites

Uranium ore was mined by private companies for federal government use in national defense programs. When the mills shut down, large piles of the sand-like material (mill tailings) remain after uranium has been extracted from the ore. Levels of human exposure to radioactive materials from the piles are low; however, in some cases tailings were used as construction materials before the potential health hazards of the tailings were recognized.

Date of Government Version: 11/04/2005
Date Data Arrived at EDR: 11/28/2005
Date Made Active in Reports: 01/30/2006
Number of Days to Update: 63

Source: Department of Energy
Telephone: 505-845-0011
Last EDR Contact: 03/20/2006
Next Scheduled EDR Contact: 06/19/2006
Data Release Frequency: Varies

ODI: Open Dump Inventory

An open dump is defined as a disposal facility that does not comply with one or more of the Part 257 or Part 258 Subtitle D Criteria.

Date of Government Version: 06/30/1985
Date Data Arrived at EDR: 08/09/2004
Date Made Active in Reports: 09/17/2004
Number of Days to Update: 39

Source: Environmental Protection Agency
Telephone: 800-424-9346
Last EDR Contact: 06/09/2004
Next Scheduled EDR Contact: N/A
Data Release Frequency: No Update Planned

GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

TRIS: Toxic Chemical Release Inventory System

Toxic Release Inventory System. TRIS identifies facilities which release toxic chemicals to the air, water and land in reportable quantities under SARA Title III Section 313.

Date of Government Version: 12/31/2003
Date Data Arrived at EDR: 07/13/2005
Date Made Active in Reports: 08/17/2005
Number of Days to Update: 35

Source: EPA
Telephone: 202-566-0250
Last EDR Contact: 03/21/2006
Next Scheduled EDR Contact: 06/19/2006
Data Release Frequency: Annually

TSCA: Toxic Substances Control Act

Toxic Substances Control Act. TSCA identifies manufacturers and importers of chemical substances included on the TSCA Chemical Substance Inventory list. It includes data on the production volume of these substances by plant site.

Date of Government Version: 12/31/2002
Date Data Arrived at EDR: 04/27/2004
Date Made Active in Reports: 05/21/2004
Number of Days to Update: 24

Source: EPA
Telephone: 202-260-5521
Last EDR Contact: 04/12/2006
Next Scheduled EDR Contact: 07/17/2006
Data Release Frequency: Every 4 Years

FTTS: FIFRA/ TSCA Tracking System - FIFRA (Federal Insecticide, Fungicide, & Rodenticide Act)/TSCA (Toxic Substances Control Act)

FTTS tracks administrative cases and pesticide enforcement actions and compliance activities related to FIFRA, TSCA and EPCRA (Emergency Planning and Community Right-to-Know Act). To maintain currency, EDR contacts the Agency on a quarterly basis.

Date of Government Version: 01/17/2006
Date Data Arrived at EDR: 01/24/2006
Date Made Active in Reports: 02/27/2006
Number of Days to Update: 34

Source: EPA/Office of Prevention, Pesticides and Toxic Substances
Telephone: 202-566-1667
Last EDR Contact: 03/20/2006
Next Scheduled EDR Contact: 06/19/2006
Data Release Frequency: Quarterly

FTTS INSP: FIFRA/ TSCA Tracking System - FIFRA (Federal Insecticide, Fungicide, & Rodenticide Act)/TSCA (Toxic Substances Control Act)

Date of Government Version: 01/17/2006
Date Data Arrived at EDR: 01/24/2006
Date Made Active in Reports: 02/27/2006
Number of Days to Update: 34

Source: EPA
Telephone: 202-566-1667
Last EDR Contact: 03/20/2006
Next Scheduled EDR Contact: 06/19/2006
Data Release Frequency: Quarterly

SSTS: Section 7 Tracking Systems

Section 7 of the Federal Insecticide, Fungicide and Rodenticide Act, as amended (92 Stat. 829) requires all registered pesticide-producing establishments to submit a report to the Environmental Protection Agency by March 1st each year. Each establishment must report the types and amounts of pesticides, active ingredients and devices being produced, and those having been produced and sold or distributed in the past year.

Date of Government Version: 12/31/2003
Date Data Arrived at EDR: 01/03/2005
Date Made Active in Reports: 01/25/2005
Number of Days to Update: 22

Source: EPA
Telephone: 202-564-4203
Last EDR Contact: 03/06/2006
Next Scheduled EDR Contact: 07/17/2006
Data Release Frequency: Annually

PADS: PCB Activity Database System

PCB Activity Database. PADS Identifies generators, transporters, commercial storers and/or brokers and disposers of PCB's who are required to notify the EPA of such activities.

Date of Government Version: 12/27/2005
Date Data Arrived at EDR: 02/08/2006
Date Made Active in Reports: 02/27/2006
Number of Days to Update: 19

Source: EPA
Telephone: 202-566-0500
Last EDR Contact: 02/08/2006
Next Scheduled EDR Contact: 05/08/2006
Data Release Frequency: Annually

MLTS: Material Licensing Tracking System

MLTS is maintained by the Nuclear Regulatory Commission and contains a list of approximately 8,100 sites which possess or use radioactive materials and which are subject to NRC licensing requirements. To maintain currency, EDR contacts the Agency on a quarterly basis.

Date of Government Version: 02/10/2006
Date Data Arrived at EDR: 02/16/2006
Date Made Active in Reports: 03/31/2006
Number of Days to Update: 43

Source: Nuclear Regulatory Commission
Telephone: 301-415-7169
Last EDR Contact: 04/03/2006
Next Scheduled EDR Contact: 07/03/2006
Data Release Frequency: Quarterly

MINES: Mines Master Index File

Contains all mine identification numbers issued for mines active or opened since 1971. The data also includes violation information.

Date of Government Version: 11/08/2005
Date Data Arrived at EDR: 12/27/2005
Date Made Active in Reports: 01/30/2006
Number of Days to Update: 34

Source: Department of Labor, Mine Safety and Health Administration
Telephone: 303-231-5959
Last EDR Contact: 03/29/2006
Next Scheduled EDR Contact: 06/26/2006
Data Release Frequency: Semi-Annually

FINDS: Facility Index System/Facility Registry System

Facility Index System. FINDS contains both facility information and 'pointers' to other sources that contain more detail. EDR includes the following FINDS databases in this report: PCS (Permit Compliance System), AIRS (Aerometric Information Retrieval System), DOCKET (Enforcement Docket used to manage and track information on civil judicial enforcement cases for all environmental statutes), FURS (Federal Underground Injection Control), C-DOCKET (Criminal Docket System used to track criminal enforcement actions for all environmental statutes), FFIS (Federal Facilities Information System), STATE (State Environmental Laws and Statutes), and PADS (PCB Activity Data System).

Date of Government Version: 01/09/2006
Date Data Arrived at EDR: 01/16/2006
Date Made Active in Reports: 02/21/2006
Number of Days to Update: 36

Source: EPA
Telephone: N/A
Last EDR Contact: 04/03/2006
Next Scheduled EDR Contact: 07/03/2006
Data Release Frequency: Quarterly

RAATS: RCRA Administrative Action Tracking System

RCRA Administration Action Tracking System. RAATS contains records based on enforcement actions issued under RCRA pertaining to major violators and includes administrative and civil actions brought by the EPA. For administration actions after September 30, 1995, data entry in the RAATS database was discontinued. EPA will retain a copy of the database for historical records. It was necessary to terminate RAATS because a decrease in agency resources made it impossible to continue to update the information contained in the database.

Date of Government Version: 04/17/1995
Date Data Arrived at EDR: 07/03/1995
Date Made Active in Reports: 08/07/1995
Number of Days to Update: 35

Source: EPA
Telephone: 202-564-4104
Last EDR Contact: 03/06/2006
Next Scheduled EDR Contact: 06/05/2006
Data Release Frequency: No Update Planned

BRS: Biennial Reporting System

The Biennial Reporting System is a national system administered by the EPA that collects data on the generation and management of hazardous waste. BRS captures detailed data from two groups: Large Quantity Generators (LQG) and Treatment, Storage, and Disposal Facilities.

Date of Government Version: 12/31/2003
Date Data Arrived at EDR: 06/17/2005
Date Made Active in Reports: 08/04/2005
Number of Days to Update: 48

Source: EPA/NTIS
Telephone: 800-424-9346
Last EDR Contact: 03/17/2006
Next Scheduled EDR Contact: 06/12/2006
Data Release Frequency: Biennially

STATE AND LOCAL RECORDS

AWP: Annual Workplan Sites

Known Hazardous Waste Sites. California DTSC's Annual Workplan (AWP), formerly BEP, identifies known hazardous substance sites targeted for cleanup.

Date of Government Version: 08/08/2005
Date Data Arrived at EDR: 08/29/2005
Date Made Active in Reports: 09/21/2005
Number of Days to Update: 23

Source: California Environmental Protection Agency
Telephone: 916-323-3400
Last EDR Contact: 04/05/2006
Next Scheduled EDR Contact: 05/29/2006
Data Release Frequency: Annually

CAL-SITES: Calsites Database

The Calsites database contains potential or confirmed hazardous substance release properties. In 1996, California EPA reevaluated and significantly reduced the number of sites in the Calsites database.

Date of Government Version: 08/08/2005
Date Data Arrived at EDR: 08/29/2005
Date Made Active in Reports: 09/21/2005
Number of Days to Update: 23

Source: Department of Toxic Substance Control
Telephone: 916-323-3400
Last EDR Contact: 04/05/2006
Next Scheduled EDR Contact: 05/29/2006
Data Release Frequency: Quarterly

CA BOND EXP. PLAN: Bond Expenditure Plan

Department of Health Services developed a site-specific expenditure plan as the basis for an appropriation of Hazardous Substance Cleanup Bond Act funds. It is not updated.

Date of Government Version: 01/01/1989
Date Data Arrived at EDR: 07/27/1994
Date Made Active in Reports: 08/02/1994
Number of Days to Update: 6

Source: Department of Health Services
Telephone: 916-255-2118
Last EDR Contact: 05/31/1994
Next Scheduled EDR Contact: N/A
Data Release Frequency: No Update Planned

NFA: No Further Action Determination

This category contains properties at which DTSC has made a clear determination that the property does not pose a problem to the environment or to public health.

Date of Government Version: 08/08/2005
Date Data Arrived at EDR: 08/29/2005
Date Made Active in Reports: 10/06/2005
Number of Days to Update: 38

Source: Department of Toxic Substances Control
Telephone: 916-323-3400
Last EDR Contact: 04/05/2006
Next Scheduled EDR Contact: 05/29/2006
Data Release Frequency: Quarterly

NFE: Properties Needing Further Evaluation

This category contains properties that are suspected of being contaminated. These are unconfirmed contaminated properties that need to be assessed using the PEA process. PEA in Progress indicates properties where DTSC is currently conducting a PEA. PEA Required indicates properties where DTSC has determined a PEA is required, but not currently underway.

Date of Government Version: 08/08/2005
Date Data Arrived at EDR: 08/29/2005
Date Made Active in Reports: 09/21/2005
Number of Days to Update: 23

Source: Department of Toxic Substances Control
Telephone: 916-323-3400
Last EDR Contact: 04/05/2006
Next Scheduled EDR Contact: 05/29/2006
Data Release Frequency: Quarterly

REF: Unconfirmed Properties Referred to Another Agency

This category contains properties where contamination has not been confirmed and which were determined as not requiring direct DTSC Site Mitigation Program action or oversight. Accordingly, these sites have been referred to another state or local regulatory agency.

Date of Government Version: 08/08/2005
Date Data Arrived at EDR: 08/29/2005
Date Made Active in Reports: 10/06/2005
Number of Days to Update: 38

Source: Department of Toxic Substances Control
Telephone: 916-323-3400
Last EDR Contact: 04/05/2006
Next Scheduled EDR Contact: 05/29/2006
Data Release Frequency: Quarterly

SCH: School Property Evaluation Program

This category contains proposed and existing school sites that are being evaluated by DTSC for possible hazardous materials contamination. In some cases, these properties may be listed in the CalSites category depending on the level of threat to public health and safety or the environment they pose.

Date of Government Version: 08/08/2005
Date Data Arrived at EDR: 08/29/2005
Date Made Active in Reports: 10/06/2005
Number of Days to Update: 38

Source: Department of Toxic Substances Control
Telephone: 916-323-3400
Last EDR Contact: 04/05/2006
Next Scheduled EDR Contact: 05/29/2006
Data Release Frequency: Quarterly

TOXIC PITS: Toxic Pits Cleanup Act Sites

Toxic PITS Cleanup Act Sites. TOXIC PITS identifies sites suspected of containing hazardous substances where cleanup has not yet been completed.

Date of Government Version: 07/01/1995
Date Data Arrived at EDR: 08/30/1995
Date Made Active in Reports: 09/26/1995
Number of Days to Update: 27

Source: State Water Resources Control Board
Telephone: 916-227-4364
Last EDR Contact: 01/30/2006
Next Scheduled EDR Contact: 05/01/2006
Data Release Frequency: No Update Planned

SWF/LF (SWIS): Solid Waste Information System

Active, Closed and Inactive Landfills. SWF/LF records typically contain an inventory of solid waste disposal facilities or landfills. These may be active or inactive facilities or open dumps that failed to meet RCRA Section 4004 criteria for solid waste landfills or disposal sites.

Date of Government Version: 03/13/2006
Date Data Arrived at EDR: 03/15/2006
Date Made Active in Reports: 04/13/2006
Number of Days to Update: 29

Source: Integrated Waste Management Board
Telephone: 916-341-6320
Last EDR Contact: 03/15/2006
Next Scheduled EDR Contact: 06/12/2006
Data Release Frequency: Quarterly

CA WDS: Waste Discharge System

Sites which have been issued waste discharge requirements.

Date of Government Version: 03/20/2006
Date Data Arrived at EDR: 03/21/2006
Date Made Active in Reports: 04/13/2006
Number of Days to Update: 23

Source: State Water Resources Control Board
Telephone: 916-341-5227
Last EDR Contact: 03/21/2006
Next Scheduled EDR Contact: 06/19/2006
Data Release Frequency: Quarterly

WMUDS/SWAT: Waste Management Unit Database

Waste Management Unit Database System. WMUDS is used by the State Water Resources Control Board staff and the Regional Water Quality Control Boards for program tracking and inventory of waste management units. WMUDS is composed of the following databases: Facility Information, Scheduled Inspections Information, Waste Management Unit Information, SWAT Program Information, SWAT Report Summary Information, SWAT Report Summary Data, Chapter 15 (formerly Subchapter 15) Information, Chapter 15 Monitoring Parameters, TPCA Program Information, RCRA Program Information, Closure Information, and Interested Parties Information.

Date of Government Version: 04/01/2000
Date Data Arrived at EDR: 04/10/2000
Date Made Active in Reports: 05/10/2000
Number of Days to Update: 30

Source: State Water Resources Control Board
Telephone: 916-227-4448
Last EDR Contact: 03/06/2006
Next Scheduled EDR Contact: 06/05/2006
Data Release Frequency: Quarterly

CORTESE: "Cortese" Hazardous Waste & Substances Sites List

The sites for the list are designated by the State Water Resource Control Board (LUST), the Integrated Waste Board (SWF/LS), and the Department of Toxic Substances Control (Cal-Sites). This listing is no longer updated by the state agency.

Date of Government Version: 04/01/2001
Date Data Arrived at EDR: 05/29/2001
Date Made Active in Reports: 07/26/2001
Number of Days to Update: 58

Source: CAL EPA/Office of Emergency Information
Telephone: 916-323-9100
Last EDR Contact: 02/06/2006
Next Scheduled EDR Contact: 04/24/2006
Data Release Frequency: No Update Planned

SWRCY: Recycler Database
A listing of recycling facilities in California.

Date of Government Version: 01/05/2006
Date Data Arrived at EDR: 01/09/2006
Date Made Active in Reports: 01/31/2006
Number of Days to Update: 22

Source: Department of Conservation
Telephone: 916-323-3836
Last EDR Contact: 04/11/2006
Next Scheduled EDR Contact: 07/10/2006
Data Release Frequency: Quarterly

LUST: Geotracker's Leaking Underground Fuel Tank Report
Leaking Underground Storage Tank Incident Reports. LUST records contain an inventory of reported leaking underground storage tank incidents. Not all states maintain these records, and the information stored varies by state.

Date of Government Version: 01/09/2006
Date Data Arrived at EDR: 01/09/2006
Date Made Active in Reports: 01/31/2006
Number of Days to Update: 22

Source: State Water Resources Control Board
Telephone: 916-341-5752
Last EDR Contact: 04/11/2006
Next Scheduled EDR Contact: 07/10/2006
Data Release Frequency: Quarterly

LUST REG 4: Underground Storage Tank Leak List
Los Angeles, Ventura counties. For more current information, please refer to the State Water Resources Control Board's LUST database.

Date of Government Version: 09/07/2004
Date Data Arrived at EDR: 09/07/2004
Date Made Active in Reports: 10/12/2004
Number of Days to Update: 35

Source: California Regional Water Quality Control Board Los Angeles Region (4)
Telephone: 213-576-6600
Last EDR Contact: 03/28/2006
Next Scheduled EDR Contact: 06/26/2006
Data Release Frequency: No Update Planned

LUST REG 6L: Leaking Underground Storage Tank Case Listing
For more current information, please refer to the State Water Resources Control Board's LUST database.

Date of Government Version: 09/09/2003
Date Data Arrived at EDR: 09/10/2003
Date Made Active in Reports: 10/07/2003
Number of Days to Update: 27

Source: California Regional Water Quality Control Board Lahontan Region (6)
Telephone: 916-542-5424
Last EDR Contact: 03/06/2006
Next Scheduled EDR Contact: 06/05/2006
Data Release Frequency: No Update Planned

LUST REG 9: Leaking Underground Storage Tank Report
Orange, Riverside, San Diego counties. For more current information, please refer to the State Water Resources Control Board's LUST database.

Date of Government Version: 03/01/2001
Date Data Arrived at EDR: 04/23/2001
Date Made Active in Reports: 05/21/2001
Number of Days to Update: 28

Source: California Regional Water Quality Control Board San Diego Region (9)
Telephone: 858-467-2980
Last EDR Contact: 04/11/2006
Next Scheduled EDR Contact: 07/17/2006
Data Release Frequency: No Update Planned

LUST REG 8: Leaking Underground Storage Tanks
California Regional Water Quality Control Board Santa Ana Region (8). For more current information, please refer to the State Water Resources Control Board's LUST database.

Date of Government Version: 02/14/2005
Date Data Arrived at EDR: 02/15/2005
Date Made Active in Reports: 03/28/2005
Number of Days to Update: 41

Source: California Regional Water Quality Control Board Santa Ana Region (8)
Telephone: 951-782-4130
Last EDR Contact: 02/06/2006
Next Scheduled EDR Contact: 05/08/2006
Data Release Frequency: Varies

LUST REG 7: Leaking Underground Storage Tank Case Listing

Date of Government Version: 02/26/2004
Date Data Arrived at EDR: 02/26/2004
Date Made Active in Reports: 03/24/2004
Number of Days to Update: 27

Source: California Regional Water Quality Control Board Colorado River Basin Region (7)
Telephone: 760-346-7491
Last EDR Contact: 12/27/2005
Next Scheduled EDR Contact: 03/27/2006
Data Release Frequency: No Update Planned

LUST REG 6V: Leaking Underground Storage Tank Case Listing

Date of Government Version: 06/07/2005
Date Data Arrived at EDR: 06/07/2005
Date Made Active in Reports: 06/29/2005
Number of Days to Update: 22

Source: California Regional Water Quality Control Board Victorville Branch Office (6)
Telephone: 760-346-7491
Last EDR Contact: 04/03/2006
Next Scheduled EDR Contact: 07/03/2006
Data Release Frequency: No Update Planned

LUST REG 5: Leaking Underground Storage Tank Database

Date of Government Version: 01/15/2006
Date Data Arrived at EDR: 01/16/2006
Date Made Active in Reports: 02/21/2006
Number of Days to Update: 36

Source: California Regional Water Quality Control Board Central Valley Region (5)
Telephone: 916-464-3291
Last EDR Contact: 04/13/2006
Next Scheduled EDR Contact: 07/03/2006
Data Release Frequency: Quarterly

LUST REG 3: Leaking Underground Storage Tank Database

Date of Government Version: 05/19/2003
Date Data Arrived at EDR: 05/19/2003
Date Made Active in Reports: 06/02/2003
Number of Days to Update: 14

Source: California Regional Water Quality Control Board Central Coast Region (3)
Telephone: 805-549-3147
Last EDR Contact: 02/13/2006
Next Scheduled EDR Contact: 05/15/2006
Data Release Frequency: No Update Planned

LUST REG 1: Active Toxic Site Investigation

Del Norte, Humboldt, Lake, Mendocino, Modoc, Siskiyou, Sonoma, Trinity counties. For more current information, please refer to the State Water Resources Control Board's LUST database.

Date of Government Version: 02/01/2001
Date Data Arrived at EDR: 02/28/2001
Date Made Active in Reports: 03/29/2001
Number of Days to Update: 29

Source: California Regional Water Quality Control Board North Coast (1)
Telephone: 707-576-2220
Last EDR Contact: 02/20/2006
Next Scheduled EDR Contact: 05/22/2006
Data Release Frequency: No Update Planned

LUST REG 2: Fuel Leak List

Date of Government Version: 09/30/2004
Date Data Arrived at EDR: 10/20/2004
Date Made Active in Reports: 11/19/2004
Number of Days to Update: 30

Source: California Regional Water Quality Control Board San Francisco Bay Region (2)
Telephone: 510-286-0457
Last EDR Contact: 04/10/2006
Next Scheduled EDR Contact: 07/10/2006
Data Release Frequency: Quarterly

CA FID UST: Facility Inventory Database

The Facility Inventory Database (FID) contains a historical listing of active and inactive underground storage tank locations from the State Water Resource Control Board. Refer to local/county source for current data.

Date of Government Version: 10/31/1994
Date Data Arrived at EDR: 09/05/1995
Date Made Active in Reports: 09/29/1995
Number of Days to Update: 24

Source: California Environmental Protection Agency
Telephone: 916-341-5851
Last EDR Contact: 12/28/1998
Next Scheduled EDR Contact: N/A
Data Release Frequency: No Update Planned

SLIC: Statewide SLIC Cases
The Spills, Leaks, Investigations, and Cleanups (SLIC) listings includes unauthorized discharges from spills and leaks, other than from underground storage tanks or other regulated sites.

Date of Government Version: 01/09/2006
Date Data Arrived at EDR: 01/09/2006
Date Made Active in Reports: 01/31/2006
Number of Days to Update: 22

Source: State Water Resources Control Board
Telephone: 916-341-5752
Last EDR Contact: 04/11/2006
Next Scheduled EDR Contact: 07/10/2006
Data Release Frequency: Varies

SLIC REG 1: Active Toxic Site Investigations

Date of Government Version: 04/03/2003
Date Data Arrived at EDR: 04/07/2003
Date Made Active in Reports: 04/25/2003
Number of Days to Update: 18

Source: California Regional Water Quality Control Board, North Coast Region (1)
Telephone: 707-576-2220
Last EDR Contact: 02/20/2006
Next Scheduled EDR Contact: 05/22/2006
Data Release Frequency: No Update Planned

SLIC REG 2: Spills, Leaks, Investigation & Cleanup Cost Recovery Listing
Any contaminated site that impacts groundwater or has the potential to impact groundwater.

Date of Government Version: 09/30/2004
Date Data Arrived at EDR: 10/20/2004
Date Made Active in Reports: 11/19/2004
Number of Days to Update: 30

Source: Regional Water Quality Control Board San Francisco Bay Region (2)
Telephone: 510-286-0457
Last EDR Contact: 04/10/2006
Next Scheduled EDR Contact: 07/10/2006
Data Release Frequency: Quarterly

SLIC REG 3: Spills, Leaks, Investigation & Cleanup Cost Recovery Listing
Any contaminated site that impacts groundwater or has the potential to impact groundwater.

Date of Government Version: 02/17/2006
Date Data Arrived at EDR: 02/17/2006
Date Made Active in Reports: 03/13/2006
Number of Days to Update: 24

Source: California Regional Water Quality Control Board Central Coast Region (3)
Telephone: 805-549-3147
Last EDR Contact: 02/13/2006
Next Scheduled EDR Contact: 05/15/2006
Data Release Frequency: Semi-Annually

SLIC REG 4: Spills, Leaks, Investigation & Cleanup Cost Recovery Listing
Any contaminated site that impacts groundwater or has the potential to impact groundwater.

Date of Government Version: 11/17/2004
Date Data Arrived at EDR: 11/18/2004
Date Made Active in Reports: 01/04/2005
Number of Days to Update: 47

Source: Region Water Quality Control Board Los Angeles Region (4)
Telephone: 213-576-6600
Last EDR Contact: 01/23/2006
Next Scheduled EDR Contact: 04/24/2006
Data Release Frequency: Varies

SLIC REG 5: Spills, Leaks, Investigation & Cleanup Cost Recovery Listing
Unregulated sites that impact groundwater or have the potential to impact groundwater.

Date of Government Version: 04/01/2005
Date Data Arrived at EDR: 04/05/2005
Date Made Active in Reports: 04/21/2005
Number of Days to Update: 16

Source: Regional Water Quality Control Board Central Valley Region (5)
Telephone: 916-464-3291
Last EDR Contact: 04/05/2006
Next Scheduled EDR Contact: 07/03/2006
Data Release Frequency: Semi-Annually

SLIC REG 6V: Spills, Leaks, Investigation & Cleanup Cost Recovery Listing

Date of Government Version: 05/24/2005
Date Data Arrived at EDR: 05/25/2005
Date Made Active in Reports: 06/16/2005
Number of Days to Update: 22

Source: Regional Water Quality Control Board, Victorville Branch
Telephone: 619-241-6583
Last EDR Contact: 04/03/2006
Next Scheduled EDR Contact: 07/03/2006
Data Release Frequency: Semi-Annually

SLIC REG 6L: SLIC Sites

Date of Government Version: 09/07/2004
Date Data Arrived at EDR: 09/07/2004
Date Made Active in Reports: 10/12/2004
Number of Days to Update: 35

Source: California Regional Water Quality Control Board, Lahontan Region
Telephone: 530-542-5574
Last EDR Contact: 03/06/2006
Next Scheduled EDR Contact: 06/05/2006
Data Release Frequency: No Update Planned

SLIC REG 7: SLIC List

Date of Government Version: 11/24/2004
Date Data Arrived at EDR: 11/29/2004
Date Made Active in Reports: 01/04/2005
Number of Days to Update: 36

Source: California Regional Quality Control Board, Colorado River Basin Region
Telephone: 760-346-7491
Last EDR Contact: 03/06/2006
Next Scheduled EDR Contact: 05/22/2006
Data Release Frequency: No Update Planned

SLIC REG 8: Spills, Leaks, Investigation & Cleanup Cost Recovery Listing

Date of Government Version: 11/17/2004
Date Data Arrived at EDR: 01/17/2006
Date Made Active in Reports: 02/21/2006
Number of Days to Update: 35

Source: California Region Water Quality Control Board Santa Ana Region (8)
Telephone: 951-782-3298
Last EDR Contact: 04/05/2006
Next Scheduled EDR Contact: 07/03/2006
Data Release Frequency: Semi-Annually

SLIC REG 9: Spills, Leaks, Investigation & Cleanup Cost Recovery Listing

Date of Government Version: 03/14/2006
Date Data Arrived at EDR: 03/14/2006
Date Made Active in Reports: 04/13/2006
Number of Days to Update: 30

Source: California Regional Water Quality Control Board San Diego Region (9)
Telephone: 858-467-2980
Last EDR Contact: 03/13/2006
Next Scheduled EDR Contact: 05/29/2006
Data Release Frequency: Annually

UST: Active UST Facilities
Active UST facilities gathered from the local regulatory agencies

Date of Government Version: 01/09/2006
Date Data Arrived at EDR: 01/09/2006
Date Made Active in Reports: 01/31/2006
Number of Days to Update: 22

Source: SWRCB
Telephone: 916-341-5851
Last EDR Contact: 04/11/2006
Next Scheduled EDR Contact: 07/10/2006
Data Release Frequency: Semi-Annually

HIST UST: Hazardous Substance Storage Container Database
The Hazardous Substance Storage Container Database is a historical listing of UST sites. Refer to local/county source for current data.

Date of Government Version: 10/15/1990
Date Data Arrived at EDR: 01/25/1991
Date Made Active in Reports: 02/12/1991
Number of Days to Update: 18

Source: State Water Resources Control Board
Telephone: 916-341-5851
Last EDR Contact: 07/26/2001
Next Scheduled EDR Contact: N/A
Data Release Frequency: No Update Planned

AST: Aboveground Petroleum Storage Tank Facilities
Registered Aboveground Storage Tanks.

Date of Government Version: 01/30/2006
Date Data Arrived at EDR: 01/30/2006
Date Made Active in Reports: 02/17/2006
Number of Days to Update: 18

Source: State Water Resources Control Board
Telephone: 916-341-5712
Last EDR Contact: 01/30/2006
Next Scheduled EDR Contact: 05/01/2006
Data Release Frequency: Quarterly

SWEEPS UST: SWEEPS UST Listing

Statewide Environmental Evaluation and Planning System. This underground storage tank listing was updated and maintained by a company contacted by the SWRCB in the early 1980's. The listing is no longer updated or maintained. The local agency is the contact for more information on a site on the SWEEPS list.

Date of Government Version: 06/01/1994
Date Data Arrived at EDR: 07/07/2005
Date Made Active in Reports: 08/11/2005
Number of Days to Update: 35

Source: State Water Resources Control Board
Telephone: N/A
Last EDR Contact: 06/03/2005
Next Scheduled EDR Contact: N/A
Data Release Frequency: No Update Planned

CHMIRS: California Hazardous Material Incident Report System

California Hazardous Material Incident Reporting System. CHMIRS contains information on reported hazardous material incidents (accidental releases or spills).

Date of Government Version: 12/31/2004
Date Data Arrived at EDR: 11/30/2005
Date Made Active in Reports: 01/19/2006
Number of Days to Update: 50

Source: Office of Emergency Services
Telephone: 916-845-8400
Last EDR Contact: 02/20/2006
Next Scheduled EDR Contact: 05/22/2006
Data Release Frequency: Varies

NOTIFY 65: Proposition 65 Records

Proposition 65 Notification Records. NOTIFY 65 contains facility notifications about any release which could impact drinking water and thereby expose the public to a potential health risk.

Date of Government Version: 10/21/1993
Date Data Arrived at EDR: 11/01/1993
Date Made Active in Reports: 11/19/1993
Number of Days to Update: 18

Source: State Water Resources Control Board
Telephone: 916-445-3846
Last EDR Contact: 04/11/2006
Next Scheduled EDR Contact: 07/17/2006
Data Release Frequency: No Update Planned

DEED: Deed Restriction Listing

Site Mitigation and Brownfields Reuse Program Facility Sites with Deed Restrictions & Hazardous Waste Management Program Facility Sites with Deed / Land Use Restriction. The DTSC Site Mitigation and Brownfields Reuse Program (SMBRP) list includes sites cleaned up under the program's oversight and generally does not include current or former hazardous waste facilities that required a hazardous waste facility permit. The list represents deed restrictions that are active. Some sites have multiple deed restrictions. The DTSC Hazardous Waste Management Program (HWMP) has developed a list of current or former hazardous waste facilities that have a recorded land use restriction at the local county recorder's office. The land use restrictions on this list were required by the DTSC HWMP as a result of the presence of hazardous substances that remain on site after the facility (or part of the facility) has been closed or cleaned up. The types of land use restriction include deed notice, deed restriction, or a land use restriction that binds current and future owners.

Date of Government Version: 01/03/2006
Date Data Arrived at EDR: 01/04/2006
Date Made Active in Reports: 01/19/2006
Number of Days to Update: 15

Source: Department of Toxic Substances Control
Telephone: 916-323-3400
Last EDR Contact: 04/05/2006
Next Scheduled EDR Contact: 07/03/2006
Data Release Frequency: Semi-Annually

VCP: Voluntary Cleanup Program Properties

Contains low threat level properties with either confirmed or unconfirmed releases and the project proponents have request that DTSC oversee investigation and/or cleanup activities and have agreed to provide coverage for DTSC's costs.

Date of Government Version: 08/08/2005
Date Data Arrived at EDR: 08/29/2005
Date Made Active in Reports: 09/21/2005
Number of Days to Update: 23

Source: Department of Toxic Substances Control
Telephone: 916-323-3400
Last EDR Contact: 04/05/2006
Next Scheduled EDR Contact: 05/29/2006
Data Release Frequency: Quarterly

DRYCLEANERS: Cleaner Facilities

A list of drycleaner related facilities that have EPA ID numbers. These are facilities with certain SIC codes: power laundries, family and commercial; garment pressing and cleaner's agents; linen supply; coin-operated laundries and cleaning; drycleaning plants, except rugs; carpet and upholster cleaning; industrial launderers; laundry and garment services.

Date of Government Version: 04/18/2005
Date Data Arrived at EDR: 04/18/2005
Date Made Active in Reports: 05/06/2005
Number of Days to Update: 18

Source: Department of Toxic Substance Control
Telephone: 916-327-4498
Last EDR Contact: 04/03/2006
Next Scheduled EDR Contact: 07/03/2006
Data Release Frequency: Annually

WIP: Well Investigation Program Case List

Well Investigation Program case in the San Gabriel and San Fernando Valley area.

Date of Government Version: 01/23/2006
Date Data Arrived at EDR: 01/24/2006
Date Made Active in Reports: 02/21/2006
Number of Days to Update: 28

Source: Los Angeles Water Quality Control Board
Telephone: 213-576-6726
Last EDR Contact: 01/23/2006
Next Scheduled EDR Contact: 04/24/2006
Data Release Frequency: Varies

CDL: Clandestine Drug Labs

A listing of drug lab locations. Listing of a location in this database does not indicate that any illegal drug lab materials were or were not present there, and does not constitute a determination that the location either requires or does not require additional cleanup work.

Date of Government Version: 12/31/2005
Date Data Arrived at EDR: 02/10/2006
Date Made Active in Reports: 03/13/2006
Number of Days to Update: 31

Source: Department of Toxic Substances Control
Telephone: 916-255-6504
Last EDR Contact: 02/08/2006
Next Scheduled EDR Contact: 04/24/2006
Data Release Frequency: Varies

HAZNET: Facility and Manifest Data

Facility and Manifest Data. The data is extracted from the copies of hazardous waste manifests received each year by the DTSC. The annual volume of manifests is typically 700,000 - 1,000,000 annually, representing approximately 350,000 - 500,000 shipments. Data are from the manifests submitted without correction, and therefore many contain some invalid values for data elements such as generator ID, TSD ID, waste category, and disposal method.

Date of Government Version: 12/31/2003
Date Data Arrived at EDR: 10/11/2005
Date Made Active in Reports: 10/31/2005
Number of Days to Update: 20

Source: California Environmental Protection Agency
Telephone: 916-255-1136
Last EDR Contact: 02/24/2006
Next Scheduled EDR Contact: 05/08/2006
Data Release Frequency: Annually

EMI: Emissions Inventory Data

Toxics and criteria pollutant emissions data collected by the ARB and local air pollution agencies.

Date of Government Version: 12/31/2003
Date Data Arrived at EDR: 07/19/2005
Date Made Active in Reports: 08/11/2005
Number of Days to Update: 23

Source: California Air Resources Board
Telephone: 916-322-2990
Last EDR Contact: 04/14/2006
Next Scheduled EDR Contact: 07/17/2006
Data Release Frequency: Varies

TRIBAL RECORDS

INDIAN RESERV: Indian Reservations

This map layer portrays Indian administered lands of the United States that have any area equal to or greater than 640 acres.

Date of Government Version: 12/31/2004
Date Data Arrived at EDR: 02/08/2005
Date Made Active in Reports: 08/04/2005
Number of Days to Update: 177

Source: USGS
Telephone: 202-208-3710
Last EDR Contact: 02/06/2006
Next Scheduled EDR Contact: 05/08/2006
Data Release Frequency: Semi-Annually

INDIAN LUST: Leaking Underground Storage Tanks on Indian Land
LUSTs on Indian land in Alaska, Idaho, Oregon and Washington.

Date of Government Version: 09/07/2005
Date Data Arrived at EDR: 09/08/2005
Date Made Active in Reports: 10/31/2005
Number of Days to Update: 53

Source: EPA Region 10
Telephone: 206-553-2857
Last EDR Contact: 01/10/2006
Next Scheduled EDR Contact: 05/22/2006
Data Release Frequency: Varies

INDIAN LUST: Leaking Underground Storage Tanks on Indian Land
LUSTs on Indian land in Arizona, California, New Mexico and Nevada

Date of Government Version: 03/01/2006
Date Data Arrived at EDR: 03/22/2006
Date Made Active in Reports: 04/13/2006
Number of Days to Update: 22

Source: Environmental Protection Agency
Telephone: 415-972-3372
Last EDR Contact: 02/20/2006
Next Scheduled EDR Contact: 05/22/2006
Data Release Frequency: Varies

INDIAN UST: Underground Storage Tanks on Indian Land

Date of Government Version: 03/01/2006
Date Data Arrived at EDR: 03/22/2006
Date Made Active in Reports: 04/13/2006
Number of Days to Update: 22

Source: EPA Region 9
Telephone: 415-972-3368
Last EDR Contact: 02/20/2006
Next Scheduled EDR Contact: 05/22/2006
Data Release Frequency: Varies

EDR PROPRIETARY RECORDS

Manufactured Gas Plants: EDR Proprietary Manufactured Gas Plants
The EDR Proprietary Manufactured Gas Plant Database includes records of coal gas plants (manufactured gas plants) compiled by EDR's researchers. Manufactured gas sites were used in the United States from the 1800's to 1950's to produce a gas that could be distributed and used as fuel. These plants used whale oil, rosin, coal, or a mixture of coal, oil, and water that also produced a significant amount of waste. Many of the byproducts of the gas production, such as coal tar (oily waste containing volatile and non-volatile chemicals), sludges, oils and other compounds are potentially hazardous to human health and the environment. The byproduct from this process was frequently disposed of directly at the plant site and can remain or spread slowly, serving as a continuous source of soil and groundwater contamination.

Date of Government Version: N/A
Date Data Arrived at EDR: N/A
Date Made Active in Reports: N/A
Number of Days to Update: N/A

Source: EDR, Inc.
Telephone: N/A
Last EDR Contact: N/A
Next Scheduled EDR Contact: N/A
Data Release Frequency: No Update Planned

EDR Historical Auto Stations: EDR Proprietary Historic Gas Stations
EDR has searched selected national collections of business directories and has collected listings of potential gas station/filling station/service station sites that were available to EDR researchers. EDR's review was limited to those categories of sources that might, in EDR's opinion, include gas station/filling station/service station establishments. The categories reviewed included, but were not limited to gas, gas station, gasoline station, filling station, auto, automobile repair, auto service station, service station, etc.

Date of Government Version: N/A
Date Data Arrived at EDR: N/A
Date Made Active in Reports: N/A
Number of Days to Update: N/A

Source: EDR, Inc.
Telephone: N/A
Last EDR Contact: N/A
Next Scheduled EDR Contact: N/A
Data Release Frequency: Varies

EDR Historical Cleaners: EDR Proprietary Historic Dry Cleaners
EDR has searched selected national collections of business directories and has collected listings of potential dry cleaner sites that were available to EDR researchers. EDR's review was limited to those categories of sources that might, in EDR's opinion, include dry cleaning establishments. The categories reviewed included, but were not limited to dry cleaners, cleaners, laundry, laundromat, cleaning/laundry, wash & dry etc.

Date of Government Version: N/A
Date Data Arrived at EDR: N/A
Date Made Active in Reports: N/A
Number of Days to Update: N/A

Source: EDR, Inc.
Telephone: N/A
Last EDR Contact: N/A
Next Scheduled EDR Contact: N/A
Data Release Frequency: Varies

COUNTY RECORDS

ALAMEDA COUNTY:

Contaminated Sites

A listing of contaminated sites overseen by the Toxic Release Program (oil and groundwater contamination from chemical releases and spills) and the Leaking Underground Storage Tank Program (soil and ground water contamination from leaking petroleum USTs).

Date of Government Version: 02/16/2006
Date Data Arrived at EDR: 02/17/2006
Date Made Active in Reports: 03/13/2006
Number of Days to Update: 24

Source: Alameda County Environmental Health Services
Telephone: 510-567-6700
Last EDR Contact: 01/23/2006
Next Scheduled EDR Contact: 04/24/2006
Data Release Frequency: Semi-Annually

Underground Tanks

Date of Government Version: 02/27/2006
Date Data Arrived at EDR: 02/28/2006
Date Made Active in Reports: 03/23/2006
Number of Days to Update: 23

Source: Alameda County Environmental Health Services
Telephone: 510-567-6700
Last EDR Contact: 02/27/2006
Next Scheduled EDR Contact: 04/24/2006
Data Release Frequency: Semi-Annually

CONTRA COSTA COUNTY:

Site List

List includes sites from the underground tank, hazardous waste generator and business plan/2185 programs.

Date of Government Version: 03/20/2006
Date Data Arrived at EDR: 03/21/2006
Date Made Active in Reports: 04/13/2006
Number of Days to Update: 23

Source: Contra Costa Health Services Department
Telephone: 925-646-2286
Last EDR Contact: 03/13/2006
Next Scheduled EDR Contact: 05/29/2006
Data Release Frequency: Semi-Annually

FRESNO COUNTY:

CUPA Resources List

Certified Unified Program Agency. CUPA's are responsible for implementing a unified hazardous materials and hazardous waste management regulatory program. The agency provides oversight of businesses that deal with hazardous materials, operate underground storage tanks or aboveground storage tanks.

Date of Government Version: 01/18/2006
Date Data Arrived at EDR: 01/18/2006
Date Made Active in Reports: 02/21/2006
Number of Days to Update: 34

Source: Dept. of Community Health
Telephone: 559-445-3271
Last EDR Contact: 04/10/2006
Next Scheduled EDR Contact: 08/07/2006
Data Release Frequency: Semi-Annually

KERN COUNTY:

Underground Storage Tank Sites & Tank Listing
Kern County Sites and Tanks Listing.

Date of Government Version: 12/09/2005
Date Data Arrived at EDR: 12/09/2005
Date Made Active in Reports: 01/11/2006
Number of Days to Update: 33

Source: Kern County Environment Health Services Department
Telephone: 661-862-8700
Last EDR Contact: 03/27/2006
Next Scheduled EDR Contact: 06/05/2006
Data Release Frequency: Quarterly

LOS ANGELES COUNTY:

San Gabriel Valley Areas of Concern
San Gabriel Valley areas where VOC contamination is at or above the MCL as designated by region 9 EPA office.

Date of Government Version: 12/31/1998
Date Data Arrived at EDR: 07/07/1999
Date Made Active in Reports: N/A
Number of Days to Update: 0

Source: EPA Region 9
Telephone: 415-972-3178
Last EDR Contact: 07/06/1999
Next Scheduled EDR Contact: N/A
Data Release Frequency: No Update Planned

City of El Segundo Underground Storage Tank

Date of Government Version: 02/27/2006
Date Data Arrived at EDR: 02/28/2006
Date Made Active in Reports: 03/23/2006
Number of Days to Update: 23

Source: City of El Segundo Fire Department
Telephone: 310-524-2236
Last EDR Contact: 02/27/2006
Next Scheduled EDR Contact: 05/15/2006
Data Release Frequency: Semi-Annually

City of Long Beach Underground Storage Tank

Date of Government Version: 03/28/2003
Date Data Arrived at EDR: 10/23/2003
Date Made Active in Reports: 11/26/2003
Number of Days to Update: 34

Source: City of Long Beach Fire Department
Telephone: 562-570-2563
Last EDR Contact: 02/24/2006
Next Scheduled EDR Contact: 05/22/2006
Data Release Frequency: Annually

City of Torrance Underground Storage Tank

Date of Government Version: 02/27/2006
Date Data Arrived at EDR: 02/28/2006
Date Made Active in Reports: 03/23/2006
Number of Days to Update: 23

Source: City of Torrance Fire Department
Telephone: 310-618-2973
Last EDR Contact: 02/27/2006
Next Scheduled EDR Contact: 05/15/2006
Data Release Frequency: Semi-Annually

HMS: Street Number List
Industrial Waste and Underground Storage Tank Sites.

Date of Government Version: 01/31/2006
Date Data Arrived at EDR: 03/24/2006
Date Made Active in Reports: 04/13/2006
Number of Days to Update: 20

Source: Department of Public Works
Telephone: 626-458-3517
Last EDR Contact: 02/13/2006
Next Scheduled EDR Contact: 05/15/2006
Data Release Frequency: Semi-Annually

List of Solid Waste Facilities

Date of Government Version: 02/14/2006
Date Data Arrived at EDR: 02/28/2006
Date Made Active in Reports: 03/13/2006
Number of Days to Update: 13

Source: La County Department of Public Works
Telephone: 818-458-5185
Last EDR Contact: 02/15/2006
Next Scheduled EDR Contact: 05/15/2006
Data Release Frequency: Varies

City of Los Angeles Landfills

Date of Government Version: 03/01/2005
Date Data Arrived at EDR: 03/18/2005
Date Made Active in Reports: 04/08/2005
Number of Days to Update: 21

Source: Engineering & Construction Division
Telephone: 213-473-7869
Last EDR Contact: 03/15/2006
Next Scheduled EDR Contact: 06/12/2006
Data Release Frequency: Varies

Site Mitigation List

Industrial sites that have had some sort of spill or complaint.

Date of Government Version: 01/05/2006
Date Data Arrived at EDR: 02/16/2006
Date Made Active in Reports: 03/13/2006
Number of Days to Update: 25

Source: Community Health Services
Telephone: 323-890-7806
Last EDR Contact: 02/03/2006
Next Scheduled EDR Contact: 05/15/2006
Data Release Frequency: Annually

MARIN COUNTY:

Underground Storage Tank Sites

Currently permitted USTs in Marin County.

Date of Government Version: 02/10/2006
Date Data Arrived at EDR: 02/28/2006
Date Made Active in Reports: 03/23/2006
Number of Days to Update: 23

Source: Public Works Department Waste Management
Telephone: 415-499-6647
Last EDR Contact: 01/30/2006
Next Scheduled EDR Contact: 05/01/2006
Data Release Frequency: Semi-Annually

NAPA COUNTY:

Sites With Reported Contamination

Date of Government Version: 04/03/2006
Date Data Arrived at EDR: 04/04/2006
Date Made Active in Reports: 04/13/2006
Number of Days to Update: 9

Source: Napa County Department of Environmental Management
Telephone: 707-253-4269
Last EDR Contact: 03/27/2006
Next Scheduled EDR Contact: 06/26/2006
Data Release Frequency: Semi-Annually

Closed and Operating Underground Storage Tank Sites

Date of Government Version: 12/27/2005
Date Data Arrived at EDR: 12/28/2005
Date Made Active in Reports: 01/11/2006
Number of Days to Update: 14

Source: Napa County Department of Environmental Management
Telephone: 707-253-4269
Last EDR Contact: 03/27/2006
Next Scheduled EDR Contact: 06/26/2006
Data Release Frequency: Annually

ORANGE COUNTY:

List of Industrial Site Cleanups

Petroleum and non-petroleum spills.

Date of Government Version: 02/01/2006
Date Data Arrived at EDR: 03/27/2006
Date Made Active in Reports: 04/13/2006
Number of Days to Update: 17

Source: Health Care Agency
Telephone: 714-834-3446
Last EDR Contact: 03/00/2006
Next Scheduled EDR Contact: 06/05/2006
Data Release Frequency: Annually

List of Underground Storage Tank Cleanups
Orange County Underground Storage Tank Cleanups (LUST).

Date of Government Version: 03/01/2006
Date Data Arrived at EDR: 03/29/2006
Date Made Active in Reports: 04/13/2006
Number of Days to Update: 15

Source: Health Care Agency
Telephone: 714-834-3446
Last EDR Contact: 03/08/2006
Next Scheduled EDR Contact: 06/05/2006
Data Release Frequency: Quarterly

List of Underground Storage Tank Facilities
Orange County Underground Storage Tank Facilities (UST).

Date of Government Version: 12/01/2005
Date Data Arrived at EDR: 12/16/2005
Date Made Active in Reports: 01/11/2006
Number of Days to Update: 26

Source: Health Care Agency
Telephone: 714-834-3446
Last EDR Contact: 03/08/2006
Next Scheduled EDR Contact: 06/05/2006
Data Release Frequency: Quarterly

PLACER COUNTY:

Master List of Facilities
List includes aboveground tanks, underground tanks and cleanup sites.

Date of Government Version: 04/03/2006
Date Data Arrived at EDR: 04/04/2006
Date Made Active in Reports: 04/13/2006
Number of Days to Update: 9

Source: Placer County Health and Human Services
Telephone: 530-889-7312
Last EDR Contact: 03/20/2006
Next Scheduled EDR Contact: 06/19/2006
Data Release Frequency: Semi-Annually

RIVERSIDE COUNTY:

Underground Storage Tank Tank List

Date of Government Version: 02/09/2006
Date Data Arrived at EDR: 02/10/2006
Date Made Active in Reports: 03/09/2006
Number of Days to Update: 27

Source: Health Services Agency
Telephone: 951-358-5055
Last EDR Contact: 04/11/2006
Next Scheduled EDR Contact: 07/17/2006
Data Release Frequency: Quarterly

Listing of Underground Tank Cleanup Sites
Riverside County Underground Storage Tank Cleanup Sites (LUST).

Date of Government Version: 02/09/2006
Date Data Arrived at EDR: 02/10/2006
Date Made Active in Reports: 03/13/2006
Number of Days to Update: 31

Source: Department of Public Health
Telephone: 951-358-5055
Last EDR Contact: 04/11/2006
Next Scheduled EDR Contact: 07/17/2006
Data Release Frequency: Quarterly

SACRAMENTO COUNTY:

CS - Contaminated Sites

Date of Government Version: 02/02/2006
Date Data Arrived at EDR: 02/13/2006
Date Made Active in Reports: 03/13/2006
Number of Days to Update: 28

Source: Sacramento County Environmental Management
Telephone: 916-875-8406
Last EDR Contact: 01/30/2006
Next Scheduled EDR Contact: 05/01/2006
Data Release Frequency: Quarterly

ML - Regulatory Compliance Master List

Any business that has hazardous materials on site - hazardous material storage sites, underground storage tanks, waste generators.

Date of Government Version: 02/02/2006
Date Data Arrived at EDR: 02/10/2006
Date Made Active in Reports: 03/13/2006
Number of Days to Update: 31

Source: Sacramento County Environmental Management
Telephone: 916-875-8406
Last EDR Contact: 01/30/2006
Next Scheduled EDR Contact: 05/01/2006
Data Release Frequency: Quarterly

SAN BERNARDINO COUNTY:

Hazardous Material Permits

This listing includes underground storage tanks, medical waste handlers/generators, hazardous materials handlers, hazardous waste generators, and waste oil generators/handlers.

Date of Government Version: 03/22/2006
Date Data Arrived at EDR: 03/23/2006
Date Made Active in Reports: 04/13/2006
Number of Days to Update: 21

Source: San Bernardino County Fire Department Hazardous Materials Division
Telephone: 909-387-3041
Last EDR Contact: 03/06/2006
Next Scheduled EDR Contact: 06/05/2006
Data Release Frequency: Quarterly

SAN DIEGO COUNTY:

Hazardous Materials Management Division Database

The database includes: HE58 - This report contains the business name, site address, business phone number, establishment 'H' permit number, type of permit, and the business status. HE17 - In addition to providing the same information provided in the HE58 listing, HE17 provides inspection dates, violations received by the establishment, hazardous waste generated, the quantity, method of storage, treatment/disposal of waste and the hauler, and information on underground storage tanks. Unauthorized Release List - Includes a summary of environmental contamination cases in San Diego County (underground tank cases, non-tank cases, groundwater contamination, and soil contamination are included.)

Date of Government Version: 05/16/2005
Date Data Arrived at EDR: 05/18/2005
Date Made Active in Reports: 06/16/2005
Number of Days to Update: 29

Source: Hazardous Materials Management Division
Telephone: 619-338-2268
Last EDR Contact: 04/05/2006
Next Scheduled EDR Contact: 07/03/2006
Data Release Frequency: Quarterly

Solid Waste Facilities

San Diego County Solid Waste Facilities.

Date of Government Version: 11/01/2005
Date Data Arrived at EDR: 12/29/2005
Date Made Active in Reports: 01/19/2006
Number of Days to Update: 21

Source: Department of Health Services
Telephone: 619-338-2209
Last EDR Contact: 02/20/2006
Next Scheduled EDR Contact: 05/22/2006
Data Release Frequency: Varies

SAN FRANCISCO COUNTY:

Local Oversite Facilities

Date of Government Version: 03/16/2006
Date Data Arrived at EDR: 03/17/2006
Date Made Active in Reports: 04/13/2006
Number of Days to Update: 27

Source: Department Of Public Health San Francisco County
Telephone: 415-252-3920
Last EDR Contact: 03/06/2006
Next Scheduled EDR Contact: 06/05/2006
Data Release Frequency: Quarterly

Underground Storage Tank Information

Date of Government Version: 03/16/2006
Date Data Arrived at EDR: 03/17/2006
Date Made Active in Reports: 04/13/2006
Number of Days to Update: 27

Source: Department of Public Health
Telephone: 415-252-3920
Last EDR Contact: 03/06/2006
Next Scheduled EDR Contact: 06/05/2006
Data Release Frequency: Quarterly

SAN JOAQUIN COUNTY:

San Joaquin Co. UST
A listing of underground storage tank locations in San Joaquin county.

Date of Government Version: 02/28/2006
Date Data Arrived at EDR: 03/17/2006
Date Made Active in Reports: 04/13/2006
Number of Days to Update: 27

Source: Environmental Health Department
Telephone: N/A
Last EDR Contact: 03/17/2006
Next Scheduled EDR Contact: 07/17/2006
Data Release Frequency: Semi-Annually

SAN MATEO COUNTY:

Business Inventory
List includes Hazardous Materials Business Plan, hazardous waste generators, and underground storage tanks.

Date of Government Version: 01/09/2006
Date Data Arrived at EDR: 01/10/2006
Date Made Active in Reports: 01/31/2006
Number of Days to Update: 21

Source: San Mateo County Environmental Health Services Division
Telephone: 650-363-1921
Last EDR Contact: 04/10/2006
Next Scheduled EDR Contact: 07/10/2006
Data Release Frequency: Annually

Fuel Leak List

Date of Government Version: 01/11/2006
Date Data Arrived at EDR: 01/12/2006
Date Made Active in Reports: 01/31/2006
Number of Days to Update: 19

Source: San Mateo County Environmental Health Services Division
Telephone: 650-363-1921
Last EDR Contact: 04/10/2006
Next Scheduled EDR Contact: 07/10/2006
Data Release Frequency: Semi-Annually

SANTA CLARA COUNTY:

Fuel Leak Site Activity Report
A listing of open and closed leaking underground storage tanks. This listing is no longer updated by the county. Leaking underground storage tanks are now handled by the Department of Environmental Health.

Date of Government Version: 03/29/2005
Date Data Arrived at EDR: 03/30/2005
Date Made Active in Reports: 04/21/2005
Number of Days to Update: 22

Source: Santa Clara Valley Water District
Telephone: 408-265-2600
Last EDR Contact: 03/28/2006
Next Scheduled EDR Contact: 06/26/2006
Data Release Frequency: No Update Planned

LOP Listing
A listing of open leaking underground storage tanks.

Date of Government Version: 03/29/2006
Date Data Arrived at EDR: 03/30/2006
Date Made Active in Reports: 04/13/2006
Number of Days to Update: 14

Source: Department of Environmental Health
Telephone: 408-918-3417
Last EDR Contact: 03/28/2006
Next Scheduled EDR Contact: 06/26/2006
Data Release Frequency: Varies

Hazardous Material Facilities

Date of Government Version: 03/09/2006
Date Data Arrived at EDR: 03/13/2006
Date Made Active in Reports: 04/13/2006
Number of Days to Update: 31

Source: City of San Jose Fire Department
Telephone: 408-277-4659
Last EDR Contact: 03/06/2006
Next Scheduled EDR Contact: 06/05/2006
Data Release Frequency: Annually

SOLANO COUNTY:

Leaking Underground Storage Tanks

Date of Government Version: 12/13/2005
Date Data Arrived at EDR: 12/14/2005
Date Made Active in Reports: 01/19/2006
Number of Days to Update: 36

Source: Solano County Department of Environmental Management
Telephone: 707-784-6770
Last EDR Contact: 03/27/2006
Next Scheduled EDR Contact: 06/12/2006
Data Release Frequency: Quarterly

Underground Storage Tanks

Date of Government Version: 10/13/2005
Date Data Arrived at EDR: 10/31/2005
Date Made Active in Reports: 12/08/2005
Number of Days to Update: 38

Source: Solano County Department of Environmental Management
Telephone: 707-784-6770
Last EDR Contact: 04/13/2006
Next Scheduled EDR Contact: 06/12/2006
Data Release Frequency: Quarterly

SONOMA COUNTY:

Leaking Underground Storage Tank Sites

Date of Government Version: 01/23/2006
Date Data Arrived at EDR: 01/23/2006
Date Made Active in Reports: 02/21/2006
Number of Days to Update: 29

Source: Department of Health Services
Telephone: 707-565-6565
Last EDR Contact: 01/23/2006
Next Scheduled EDR Contact: 04/24/2006
Data Release Frequency: Quarterly

SUTTER COUNTY:

Underground Storage Tanks

Date of Government Version: 12/31/0005
Date Data Arrived at EDR: 01/05/2006
Date Made Active in Reports: 01/31/2006
Number of Days to Update: 26

Source: Sutter County Department of Agriculture
Telephone: 530-822-7500
Last EDR Contact: 04/03/2006
Next Scheduled EDR Contact: 07/03/2006
Data Release Frequency: Semi-Annually

VENTURA COUNTY:

Business Plan, Hazardous Waste Producers, and Operating Underground Tanks

The BWT list indicates by site address whether the Environmental Health Division has Business Plan (B), Waste Producer (W), and/or Underground Tank (T) information.

Date of Government Version: 02/24/2006
Date Data Arrived at EDR: 03/31/2006
Date Made Active in Reports: 04/13/2006
Number of Days to Update: 13

Source: Ventura County Environmental Health Division
Telephone: 805-654-2813
Last EDR Contact: 03/15/2006
Next Scheduled EDR Contact: 06/12/2006
Data Release Frequency: Quarterly

Inventory of Illegal Abandoned and Inactive Sites
Ventura County Inventory of Closed, Illegal Abandoned, and Inactive Sites.

Date of Government Version: 08/01/2005
Date Data Arrived at EDR: 09/20/2005
Date Made Active in Reports: 10/06/2005
Number of Days to Update: 16

Source: Environmental Health Division
Telephone: 805-654-2813
Last EDR Contact: 02/20/2006
Next Scheduled EDR Contact: 05/22/2006
Data Release Frequency: Annually

Listing of Underground Tank Cleanup Sites
Ventura County Underground Storage Tank Cleanup Sites (LUST).

Date of Government Version: 02/24/2006
Date Data Arrived at EDR: 03/27/2006
Date Made Active in Reports: 04/13/2006
Number of Days to Update: 17

Source: Environmental Health Division
Telephone: 805-654-2813
Last EDR Contact: 03/15/2006
Next Scheduled EDR Contact: 06/12/2006
Data Release Frequency: Quarterly

Underground Tank Closed Sites List
Ventura County Operating Underground Storage Tank Sites (UST)/Underground Tank Closed Sites List.

Date of Government Version: 12/29/2005
Date Data Arrived at EDR: 01/20/2006
Date Made Active in Reports: 02/15/2006
Number of Days to Update: 26

Source: Environmental Health Division
Telephone: 805-654-2813
Last EDR Contact: 04/11/2006
Next Scheduled EDR Contact: 07/10/2006
Data Release Frequency: Quarterly

YOLO COUNTY:

Underground Storage Tank Comprehensive Facility Report

Date of Government Version: 01/18/2006
Date Data Arrived at EDR: 02/09/2006
Date Made Active in Reports: 03/09/2006
Number of Days to Update: 28

Source: Yolo County Department of Health
Telephone: 530-666-8646
Last EDR Contact: 04/11/2006
Next Scheduled EDR Contact: 07/17/2006
Data Release Frequency: Annually

OTHER DATABASE(S)

Depending on the geographic area covered by this report, the data provided in these specialty databases may or may not be complete. For example, the existence of wetlands information data in a specific report does not mean that all wetlands in the area covered by the report are included. Moreover, the absence of any reported wetlands information does not necessarily mean that wetlands do not exist in the area covered by the report.

Oil/Gas Pipelines: This data was obtained by EDR from the USGS in 1994. It is referred to by USGS as GeoData Digital Line Graphs from 1:100,000-Scale Maps. It was extracted from the transportation category including some oil, but primarily gas pipelines.

Electric Power Transmission Line Data
Source: PennWell Corporation
Telephone: (800) 823-6277
This map includes information copyrighted by PennWell Corporation. This information is provided on a best effort basis and PennWell Corporation does not guarantee its accuracy nor warrant its fitness for any particular purpose. Such information has been reprinted with the permission of PennWell.

Sensitive Receptors: There are individuals deemed sensitive receptors due to their fragile immune systems and special sensitivity to environmental discharges. These sensitive receptors typically include the elderly, the sick, and children. While the location of all sensitive receptors cannot be determined, EDR indicates those buildings and facilities - schools, daycares, hospitals, medical centers, and nursing homes - where individuals who are sensitive receptors are likely to be located.

AHA Hospitals:
Source: American Hospital Association, Inc.
Telephone: 312-280-5991
The database includes a listing of hospitals based on the American Hospital Association's annual survey of hospitals.

Medical Centers: Provider of Services Listing
Source: Centers for Medicare & Medicaid Services
Telephone: 410-786-3000
A listing of hospitals with Medicare provider number, produced by Centers of Medicare & Medicaid Services, a federal agency within the U.S. Department of Health and Human Services.

Nursing Homes
Source: National Institutes of Health
Telephone: 301-594-6248
Information on Medicare and Medicaid certified nursing homes in the United States.

Public Schools
Source: National Center for Education Statistics
Telephone: 202-502-7300
The National Center for Education Statistics' primary database on elementary and secondary public education in the United States. It is a comprehensive, annual, national statistical database of all public elementary and secondary schools and school districts, which contains data that are comparable across all states.

Private Schools
Source: National Center for Education Statistics
Telephone: 202-502-7300
The National Center for Education Statistics' primary database on private school locations in the United States.

Daycare Centers: Licensed Facilities
Source: Department of Social Services
Telephone: 916-657-4041

Flood Zone Data: This data, available in select counties across the country, was obtained by EDR in 1999 from the Federal Emergency Management Agency (FEMA). Data depicts 100-year and 500-year flood zones as defined by FEMA.

NWI: National Wetlands Inventory. This data, available in select counties across the country, was obtained by EDR in 2002 from the U.S. Fish and Wildlife Service.

STREET AND ADDRESS INFORMATION

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GEOCHECK®- PHYSICAL SETTING SOURCE ADDENDUM

TARGET PROPERTY ADDRESS

1720 E 40TH PLACE
1720 E 40TH PLACE
LOS ANGELES, CA 90058

TARGET PROPERTY COORDINATES

Latitude (North):	34.00900 - 34° 0' 32.4"
Longitude (West):	118.2425 - 118° 14' 33.0"
Universal Tranverse Mercator:	Zone 11
UTM X (Meters):	385263.9
UTM Y (Meters):	3763655.2
Elevation:	209 ft. above sea level

USGS TOPOGRAPHIC MAP

Target Property Map:	34118-A2 LOS ANGELES, CA
Most Recent Revision:	1994
South Map:	33118-H2 SOUTH GATE, CA
Most Recent Revision:	1994
Southwest Map:	33118-H3 INGLEWOOD, CA
Most Recent Revision:	1994
West Map:	34118-A3 HOLLYWOOD, CA
Most Recent Revision:	1994

EDR's GeoCheck Physical Setting Source Addendum is provided to assist the environmental professional in forming an opinion about the impact of potential contaminant migration.

Assessment of the impact of contaminant migration generally has two principle investigative components:

1. Groundwater flow direction, and
2. Groundwater flow velocity.

Groundwater flow direction may be impacted by surface topography, hydrology, hydrogeology, characteristics of the soil, and nearby wells. Groundwater flow velocity is generally impacted by the nature of the geologic strata.

GEOCHECK® - PHYSICAL SETTING SOURCE SUMMARY

GROUNDWATER FLOW DIRECTION INFORMATION

Groundwater flow direction for a particular site is best determined by a qualified environmental professional using site-specific well data. If such data is not reasonably ascertainable, it may be necessary to rely on other sources of information, such as surface topographic information, hydrologic information, hydrogeologic data collected on nearby properties, and regional groundwater flow information (from deep aquifers).

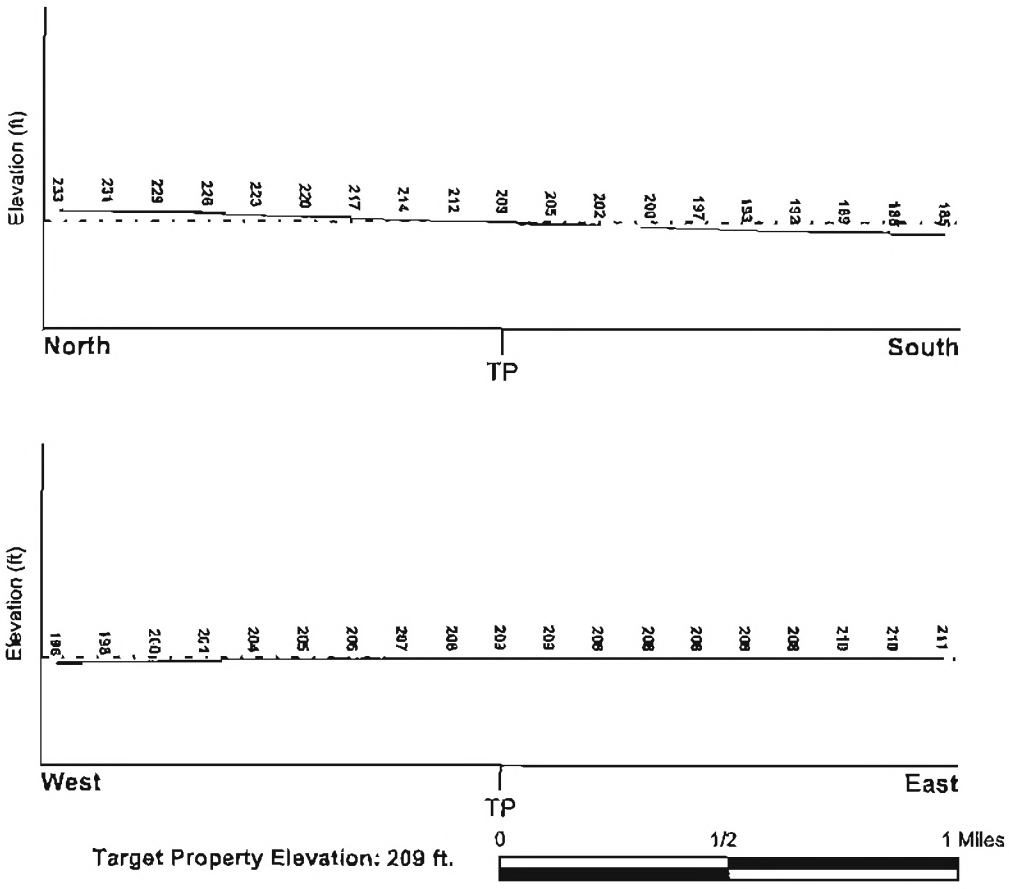
TOPOGRAPHIC INFORMATION

Surface topography may be indicative of the direction of surficial groundwater flow. This information can be used to assist the environmental professional in forming an opinion about the impact of nearby contaminated properties or, should contamination exist on the target property, what downgradient sites might be impacted.

TARGET PROPERTY TOPOGRAPHY

General Topographic Gradient: General South

SURROUNDING TOPOGRAPHY: ELEVATION PROFILES



Source: Topography has been determined from the USGS 7.5' Digital Elevation Model and should be evaluated on a relative (not an absolute) basis. Relative elevation information between sites of close proximity should be field verified.

GEOCHECK® - PHYSICAL SETTING SOURCE SUMMARY

HYDROLOGIC INFORMATION

Surface water can act as a hydrologic barrier to groundwater flow. Such hydrologic information can be used to assist the environmental professional in forming an opinion about the impact of nearby contaminated properties or, should contamination exist on the target property, what downgradient sites might be impacted.

Refer to the Physical Setting Source Map following this summary for hydrologic information (major waterways and bodies of water).

FEMA FLOOD ZONE

Target Property County	FEMA Flood Electronic Data
LOS ANGELES, CA	YES - refer to the Overview Map and Detail Map

Flood Plain Panel at Target Property:	0601370081C
Additional Panels in search area:	0601370082C 0601660000A 0601370087C

NATIONAL WETLAND INVENTORY

NWI Quad at Target Property	NWI Electronic Data Coverage
LOS ANGELES	Not Available

HYDROGEOLOGIC INFORMATION

Hydrogeologic information obtained by installation of wells on a specific site can often be an indicator of groundwater flow direction in the immediate area. Such hydrogeologic information can be used to assist the environmental professional in forming an opinion about the impact of nearby contaminated properties or, should contamination exist on the target property, what downgradient sites might be impacted.

Site-Specific Hydrogeological Data:*

Search Radius:	1.25 miles
Location Relative to TP:	1/4 - 1/2 Mile NW
Site Name:	RENU PLATING CO INC
Site EPA ID Number:	CAD048479497
Groundwater Flow Direction:	GENERALLY SW.
Inferred Depth to Water:	50 feet to 100 feet.
Hydraulic Connection:	The Bellflower aquiclude is not present at the site. The Gaspur, Exposition, and Gage aquifers of the Lakewood formation underlie the site and are hydraulically connected. The Lakewood formation is underlain by a clay layer.
Sole Source Aquifer:	No information about a sole source aquifer is available
Data Quality:	Information is inferred in the CERCLIS investigation report(s)

AQUIFLOW®

Search Radius: 1.000 Mile.

EDR has developed the AQUIFLOW Information System to provide data on the general direction of groundwater flow at specific points. EDR has reviewed reports submitted by environmental professionals to regulatory authorities at select sites and has extracted the date of the report, groundwater flow direction as determined hydrogeologically, and the depth to water table.

MAP ID	LOCATION FROM TP	GENERAL DIRECTION GROUNDWATER FLOW

*©1998 Site-specific hydrogeological data gathered by CERCLIS Alerts, Inc., Bainbridge Island, WA. All rights reserved. All of the information and opinions presented are those of the cited EPA report(s), which were completed under a Comprehensive Environmental Response Compensation and Liability Information System (CERCLIS) investigation.

GEOCHECK® - PHYSICAL SETTING SOURCE SUMMARY

MAP ID	LOCATION FROM TP	GENERAL DIRECTION GROUNDWATER FLOW
11	1/2 - 1 Mile West	Not Reported

For additional site information, refer to Physical Setting Source Map Findings.

GEOCHECK® - PHYSICAL SETTING SOURCE SUMMARY

GROUNDWATER FLOW VELOCITY INFORMATION

Groundwater flow velocity information for a particular site is best determined by a qualified environmental professional using site specific geologic and soil strata data. If such data are not reasonably ascertainable, it may be necessary to rely on other sources of information, including geologic age identification, rock stratigraphic unit and soil characteristics data collected on nearby properties and regional soil information. In general, contaminant plumes move more quickly through sandy-gravelly types of soils than silty-clayey types of soils.

GEOLOGIC INFORMATION IN GENERAL AREA OF TARGET PROPERTY

Geologic information can be used by the environmental professional in forming an opinion about the relative speed at which contaminant migration may be occurring.

ROCK STRATIGRAPHIC UNIT		GEOLOGIC AGE IDENTIFICATION	
Era:	Cenozoic	Category:	Stratified Sequence
System:	Quaternary		
Series:	Quaternary		
Code:	Q *(decoded above as Era, System & Series)*		

Geologic Age and Rock Stratigraphic Unit Source: P.G. Schruben, R.E. Arndt and W.J. Bawiec, Geology of the Conterminous U.S. at 1:2,500,000 Scale - a digital representation of the 1974 P.B. King and H.M. Beikman Map, USGS Digital Data Series DDS - 11 (1994).

DOMINANT SOIL COMPOSITION IN GENERAL AREA OF TARGET PROPERTY

The U.S. Department of Agriculture's (USDA) Soil Conservation Service (SCS) leads the National Cooperative Soil Survey (NCSS) and is responsible for collecting, storing, maintaining and distributing soil survey information for privately owned lands in the United States. A soil map in a soil survey is a representation of soil patterns in a landscape. Soil maps for STATSGO are compiled by generalizing more detailed (SSURGO) soil survey maps. The following information is based on Soil Conservation Service STATSGO data.

Soil Component Name:	URBAN LAND
Soil Surface Texture:	variable
Hydrologic Group:	Not reported
Soil Drainage Class:	Not reported

Hydric Status: Soil does not meet the requirements for a hydric soil.

Corrosion Potential - Uncoated Steel:	Not Reported
Depth to Bedrock Min:	> 10 inches
Depth to Bedrock Max:	> 10 inches

GEOCHECK® - PHYSICAL SETTING SOURCE SUMMARY

Soil Layer Information							
	Boundary			Classification			
Layer	Upper	Lower	Soil Texture Class	AASHTO Group	Unified Soil	Permeability Rate (in/hr)	Soil Reaction (pH)
1	0 inches	6 inches	variable	Not reported	Not reported	Max: 0.00 Min: 0.00	Max: 0.00 Min: 0.00

OTHER SOIL TYPES IN AREA

Based on Soil Conservation Service STATSGO data, the following additional subordinant soil types may appear within the general area of target property.

Soil Surface Textures:
loam
clay
silt loam
clay loam
sandy loam
gravelly - sandy loam
loamy sand
fine sand
coarse sand
sand
gravelly - sand

Surficial Soil Types:
loam
clay
silt loam
clay loam
sandy loam
gravelly - sandy loam
loamy sand
fine sand
coarse sand
sand
gravelly - sand

Shallow Soil Types:
fine sandy loam
gravelly - loam
sand
silty clay

Deeper Soil Types:
stratified
clay loam
silty clay loam
gravelly - sandy loam
coarse sand
sand
weathered bedrock
very fine sandy loam

GEOCHECK® - PHYSICAL SETTING SOURCE SUMMARY

LOCAL / REGIONAL WATER AGENCY RECORDS

EDR Local/Regional Water Agency records provide water well information to assist the environmental professional in assessing sources that may impact ground water flow direction, and in forming an opinion about the impact of contaminant migration on nearby drinking water wells.

WELL SEARCH DISTANCE INFORMATION

DATABASE	SEARCH DISTANCE (miles)
Federal USGS	1.000
Federal FRDS PWS	Nearest PWS within 1 mile
State Database	1.000

FEDERAL USGS WELL INFORMATION

MAP ID	WELL ID	LOCATION FROM TP
1	USGS3160679	1/4 - 1/2 Mile East
A2	USGS3156214	1/2 - 1 Mile ESE
A3	USGS3160669	1/2 - 1 Mile ESE
B4	USGS3156212	1/2 - 1 Mile ESE
8	USGS3156213	1/2 - 1 Mile ESE
9	USGS3156183	1/2 - 1 Mile SSE
10	USGS3156205	1/2 - 1 Mile ESE

FEDERAL FRDS PUBLIC WATER SUPPLY SYSTEM INFORMATION

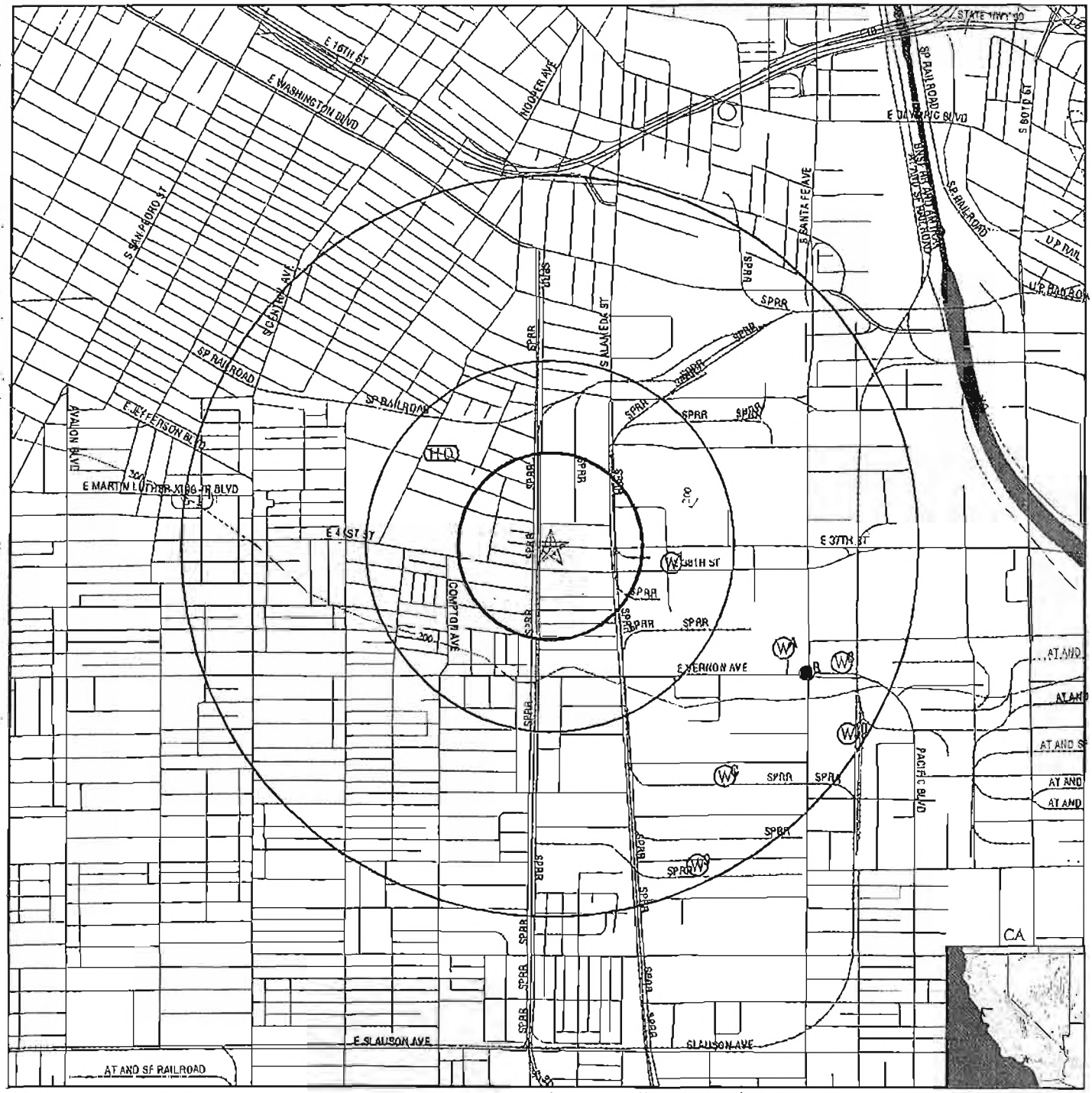
MAP ID	WELL ID	LOCATION FROM TP
B7	CA1910167	1/2 - 1 Mile ESE

Note: PWS System location is not always the same as well location.

STATE DATABASE WELL INFORMATION

MAP ID	WELL ID	LOCATION FROM TP
C5	2920	1/2 - 1 Mile SE
C6	2903	1/2 - 1 Mile SE

PHYSICAL SETTING SOURCE MAP - 1659051.2s



- County Boundary
- Major Roads
- Contour Lines
- Earthquake Fault Lines
- Earthquake epicenter, Richter 5 or greater
- Water Wells
- Public Water Supply Wells
- Cluster of Multiple Icons
- Groundwater Flow Direction
- Indeterminate Groundwater Flow at Location
- Groundwater Flow Varies at Location
- Closest Hydrogeological Data
- Oil, gas or related wells

SITE NAME: 1720 E 40th Place	CLIENT: Advantage Env. Consultants LLC
ADDRESS: 1720 E 40th Place Los Angeles CA 90058	CONTACT: Dan Wels
LAT/LONG: 34.0090 / 118.2425	INQUIRY #: 1659051.2s DATE: April 20, 2006

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Map ID Direction Distance Elevation		Database	EDR ID Number
1 **East** **1/4 - 1/2 Mile** **Lower**		**FED USGS**	**USGS3160679**

Agency cd:	USGS	Site no:	340030118140901
Site name:	002S013W10M001S		
Latitude:	340030		
Longitude:	1181409	Dec lat:	34.00834725
Dec lon:	-118.23673983	Coor meth:	M
Coor accr:	S	Latlong datum:	NAD27
Dec latlong datum:	NAD83	District:	06
State:	06	County:	037
Country:	US	Land net:	Not Reported
Location map:	LOS ANGELES	Map scale:	24000
Altitude:	Not Reported	Altitude method:	Not Reported
Altitude accuracy:	Not Reported	Altitude datum:	Not Reported
Hydrologic:	Los Angeles. California. Area = 819 sq.mi.		
Topographic:	Not Reported		
Site type:	Ground-water other than Spring	Date construction:	Not Reported
Date inventoried:	Not Reported	Mean greenwich time offset:	PST
Local standard time flag:	Y		
Type of ground water site:	Single well, other than collector or Ranney type		
Aquifer Type:	Not Reported		
Aquifer:	Not Reported		
Well depth:	874	Hole depth:	874
Source of depth data:	Not Reported	Project number:	9479335800
Real time data flag:	Not Reported	Daily flow data begin date:	Not Reported
Daily flow data end date:	Not Reported	Daily flow data count:	Not Reported
Peak flow data begin date:	Not Reported	Peak flow data end date:	Not Reported
Peak flow data count:	Not Reported	Water quality data begin date:	Not Reported
Water quality data end date:	Not Reported	Water quality data count:	Not Reported
Ground water data begin date:	Not Reported	Ground water data end date:	Not Reported
Ground water data count:	Not Reported		

Ground-water levels, Number of Measurements: 0

A2 **ESE** **1/2 - 1 Mile** **Lower**		**FED USGS**	**USGS3156214**

Agency cd:	USGS	Site no:	340017118135201
Site name:	002S013W10P005S		
Latitude:	340017		
Longitude:	1181352	Dec lat:	34.00473626
Dec lon:	-118.23201743	Coor meth:	M
Coor accr:	S	Latlong datum:	NAD27
Dec latlong datum:	NAD83	District:	06
State:	06	County:	037
Country:	US	Land net:	Not Reported
Location map:	Not Reported	Map scale:	Not Reported
Altitude:	Not Reported	Altitude method:	Not Reported
Altitude accuracy:	Not Reported	Altitude datum:	Not Reported
Hydrologic:	Los Angeles. California. Area = 819 sq.mi.		
Topographic:	Not Reported		
Site type:	Ground-water other than Spring	Date construction:	Not Reported
Date inventoried:	Not Reported	Mean greenwich time offset:	PST

Local standard time flag:	Y		
Type of ground water site:	Single well, other than collector or Ranney type		
Aquifer Type:	Not Reported		
Aquifer:	Not Reported		
Well depth:	1186	Hole depth:	1325
Source of depth data:	Not Reported	Project number:	9479335800
Real time data flag:	Not Reported	Daily flow data begin date:	Not Reported
Daily flow data end date:	Not Reported	Daily flow data count:	Not Reported
Peak flow data begin date:	Not Reported	Peak flow data end date:	Not Reported
Peak flow data count:	Not Reported	Water quality data begin date:	Not Reported
Water quality data end date:	Not Reported	Water quality data count:	Not Reported
Ground water data begin date:	Not Reported	Ground water data end date:	Not Reported
Ground water data count:	Not Reported		

Ground-water levels, Number of Measurements: 0

A3
ESE
1/2 - 1 Mile
Lower

FED USGS **USGS3160669**

Agency cd:	USGS	Site no:	340019118134801
Site name:	0020013W10P008S		
Latitude:	340019		
Longitude:	1181348	Dec lat:	34.00529178
Dec lon:	-118.23090629	Coor meth:	M
Coor accr:	S	Latlong datum:	NAD27
Dec latlong datum:	NAD83	District:	06
State:	06	County:	037
Country:	US	Land net:	Not Reported
Location map:	LOS ANGELES	Map scale:	24000
Altitude:	Not Reported	Altitude method:	Not Reported
Altitude accuracy:	Not Reported	Altitude datum:	Not Reported
Hydrologic:	Los Angeles. California. Area = 819 sq.mi.		
Topographic:	Not Reported		
Site type:	Ground-water other than Spring	Date construction:	Not Reported
Date inventoried:	Not Reported	Mean greenwich time offset:	PST
Local standard time flag:	Y		
Type of ground water site:	Single well, other than collector or Ranney type		
Aquifer Type:	Not Reported		
Aquifer:	Not Reported		
Well depth:	1460	Hole depth:	1520
Source of depth data:	Not Reported	Project number:	9479335800
Real time data flag:	Not Reported	Daily flow data begin date:	Not Reported
Daily flow data end date:	Not Reported	Daily flow data count:	Not Reported
Peak flow data begin date:	Not Reported	Peak flow data end date:	Not Reported
Peak flow data count:	Not Reported	Water quality data begin date:	Not Reported
Water quality data end date:	Not Reported	Water quality data count:	Not Reported
Ground water data begin date:	Not Reported	Ground water data end date:	Not Reported
Ground water data count:	Not Reported		

Ground-water levels, Number of Measurements: 0

B4
ESE
1/2 - 1 Mile
Lower

FED USGS **USGS3156212**

GEOCHECK® - PHYSICAL SETTING SOURCE MAP FINDINGS

Agency cd:	USGS	Site no:	340015118134701
Site name:	002S013W10P006S		
Latitude:	340015		
Longitude:	1181347	Dec lat:	34.00418071
Dec lon:	-118.23062849	Coor meth:	M
Coor accr:	S	Latlong datum:	NAD27
Dec latlong datum:	NAD83	District:	06
State:	06	County:	037
Country:	US	Land net:	Not Reported
Location map:	LOS ANGELES	Map scale:	24000
Altitude:	Not Reported	Altitude method:	Not Reported
Altitude accuracy:	Not Reported	Altitude datum:	Not Reported
Hydrologic:	Los Angeles. California. Area = 819 sq.mi.		
Topographic:	Not Reported		
Site type:	Ground-water other than Spring	Date construction:	Not Reported
Date inventoried:	Not Reported	Mean greenwich time offset:	PST
Local standard time flag:	Y		
Type of ground water site:	Single well, other than collector or Ranney type		
Aquifer Type:	Not Reported		
Aquifer:	Not Reported		
Well depth:	1107	Hole depth:	1200
Source of depth data:	Not Reported	Project number:	9479335800
Real time data flag:	Not Reported	Daily flow data begin date:	Not Reported
Daily flow data end date:	Not Reported	Daily flow data count:	Not Reported
Peak flow data begin date:	Not Reported	Peak flow data end date:	Not Reported
Peak flow data count:	Not Reported	Water quality data begin date:	Not Reported
Water quality data end date:	Not Reported	Water quality data count:	Not Reported
Ground water data begin date:	Not Reported	Ground water data end date:	Not Reported
Ground water data count:	Not Reported		

Ground-water levels, Number of Measurements: 0

C5
SE
1/2 - 1 Mile
Lower

CA WELLS 2920

Water System Information:

Prime Station Code:	02S/13W-15E02 S	User ID:	4TH
FRDS Number:	1910167012	County:	Los Angeles
District Number:	07	Station Type:	WELL/AMBNT/MUN/INTAKE/SUPPLY
Water Type:	Well/Groundwater	Well Status:	Active Untreated
Source Lat/Long:	340000.0 1181400.0	Precision:	Undefined
Source Name:	WELL 18		
System Number:	1910167		
System Name:	VERNON-CITY, WATER DEPT.		
Organization That Operates System:	4305 SANTA FE AVE VERNON, CA 90058		
Pop Served:	46000	Connections:	1068
Area Served:	VERNON		

Sample Information: * Only Findings Above Detection Level Are Listed

Sample Collected:	06/01/1989	Findings:	.500 MG/L
Chemical:	FLUORIDE (TEMPERATURE DEPENDENT)		
Sample Collected:	06/01/1989	Findings:	1.900 PCI/L
Chemical:	GROSS ALPHA		
Sample Collected:	06/01/1989	Findings:	1.500 PCI/L
Chemical:	GROSS ALPHA COUNTING ERROR		

Sample Collected:	06/01/1989	Findings:	6.600 MG/L
Chemical:	NITRATE (AS NO3)		
Sample Collected:	08/30/1989	Findings:	3.500 PCI/L
Chemical:	GROSS ALPHA		
Sample Collected:	08/30/1989	Findings:	.800 PCI/L
Chemical:	GROSS ALPHA COUNTING ERROR		
Sample Collected:	08/30/1989	Findings:	.700 UG/L
Chemical:	TRICHLOROETHYLENE		
Sample Collected:	11/07/1989	Findings:	1.200 PCI/L
Chemical:	GROSS ALPHA		
Sample Collected:	11/07/1989	Findings:	1.600 PCI/L
Chemical:	GROSS ALPHA COUNTING ERROR		
Sample Collected:	02/08/1990	Findings:	4.200 PCI/L
Chemical:	GROSS ALPHA		
Sample Collected:	02/08/1990	Findings:	2.000 PCI/L
Chemical:	GROSS ALPHA COUNTING ERROR		
Sample Collected:	02/08/1990	Findings:	.700 UG/L
Chemical:	TRICHLOROETHYLENE		
Sample Collected:	02/08/1990	Findings:	6.000 PCI/L
Chemical:	URANIUM		
Sample Collected:	08/13/1990	Findings:	1.100 UG/L
Chemical:	TRICHLOROETHYLENE		
Sample Collected:	10/23/1990	Findings:	.600 UG/L
Chemical:	TRICHLOROETHYLENE		
Sample Collected:	02/19/1991	Findings:	.700 UG/L
Chemical:	TRICHLOROETHYLENE		
Sample Collected:	06/05/1991	Findings:	.600 UG/L
Chemical:	TRICHLOROETHYLENE		
Sample Collected:	09/23/1991	Findings:	1.800 UG/L
Chemical:	TRICHLOROETHYLENE		
Sample Collected:	12/23/1991	Findings:	1.500 UG/L
Chemical:	TRICHLOROETHYLENE		
Sample Collected:	04/16/1992	Findings:	.430 MG/L
Chemical:	FLUORIDE (TEMPERATURE DEPENDENT)		
Sample Collected:	04/16/1992	Findings:	2.200 MG/L
Chemical:	NITRATE (AS NO3)		
Sample Collected:	01/27/1993	Findings:	.700 UG/L
Chemical:	TRICHLOROETHYLENE		
Sample Collected:	08/19/1993	Findings:	13.500 PCI/L
Chemical:	GROSS ALPHA		
Sample Collected:	08/19/1993	Findings:	2.300 PCI/L
Chemical:	GROSS ALPHA COUNTING ERROR		
Sample Collected:	08/19/1993	Findings:	10.000 PCI/L
Chemical:	URANIUM		
Sample Collected:	08/19/1993	Findings:	2.000 UG/L
Chemical:	TRICHLOROETHYLENE		
Sample Collected:	11/04/1993	Findings:	5.500 PCI/L
Chemical:	GROSS ALPHA		
Sample Collected:	11/04/1993	Findings:	2.400 PCI/L
Chemical:	GROSS ALPHA COUNTING ERROR		

Sample Collected:	11/04/1993	Findings:	5.000 PCI/L
Chemical:	URANIUM		
Sample Collected:	11/04/1993	Findings:	.600 UG/L
Chemical:	TRICHLOROETHYLENE		
Sample Collected:	04/19/1994	Findings:	.700 UG/L
Chemical:	TRICHLOROETHYLENE		
Sample Collected:	07/27/1994	Findings:	20.000 C
Chemical:	SOURCE TEMPERATURE C		
Sample Collected:	07/27/1994	Findings:	700.000 UMHO
Chemical:	SPECIFIC CONDUCTANCE		
Sample Collected:	07/27/1994	Findings:	7.900
Chemical:	PH (LABORATORY)		
Sample Collected:	07/27/1994	Findings:	196.000 MG/L
Chemical:	TOTAL ALKALINITY (AS CACO3)		
Sample Collected:	07/27/1994	Findings:	239.100 MG/L
Chemical:	BICARBONATE ALKALINITY		
Sample Collected:	07/27/1994	Findings:	258.000 MG/L
Chemical:	TOTAL HARDNESS (AS CACO3)		
Sample Collected:	07/27/1994	Findings:	68.100 MG/L
Chemical:	CALCIUM		
Sample Collected:	07/27/1994	Findings:	17.800 MG/L
Chemical:	MAGNESIUM		
Sample Collected:	07/27/1994	Findings:	43.600 MG/L
Chemical:	SODIUM		
Sample Collected:	07/27/1994	Findings:	3.600 MG/L
Chemical:	POTASSIUM		
Sample Collected:	07/27/1994	Findings:	35.400 MG/L
Chemical:	CHLORIDE		
Sample Collected:	07/27/1994	Findings:	.600 MG/L
Chemical:	FLUORIDE (TEMPERATURE DEPENDENT)		
Sample Collected:	07/27/1994	Findings:	390.000 MG/L
Chemical:	TOTAL DISSOLVED SOLIDS		
Sample Collected:	07/27/1994	Findings:	2.300 MG/L
Chemical:	NITRATE (AS NO3)		
Sample Collected:	07/27/1994	Findings:	.100 NTU
Chemical:	TURBIDITY (LAB)		
Sample Collected:	11/03/1994	Findings:	1.100 UG/L
Chemical:	TRICHLOROETHYLENE		
Sample Collected:	02/08/1995	Findings:	.800 UG/L
Chemical:	TRICHLOROETHYLENE		
Sample Collected:	05/04/1995	Findings:	.300 MG/L
Chemical:	FLUORIDE (TEMPERATURE DEPENDENT)		
Sample Collected:	05/04/1995	Findings:	2.200 UG/L
Chemical:	ARSENIC		
Sample Collected:	05/04/1995	Findings:	2.600 MG/L
Chemical:	NITRATE (AS NO3)		
Sample Collected:	05/04/1995	Findings:	587.000 UG/L
Chemical:	NITRATE + NITRITE (AS N)		
Sample Collected:	07/25/1995	Findings:	1.000 UG/L
Chemical:	TRICHLOROETHYLENE		

Sample Collected:	11/13/1995	Findings:	.900 UG/L
Chemical:	TRICHLOROETHYLENE		
Sample Collected:	10/08/1996	Findings:	2.200 UG/L
Chemical:	CHLOROFORM (THM)		
Sample Collected:	10/08/1996	Findings:	2.400 UG/L
Chemical:	CHLOROFORM (THM)		
Sample Collected:	06/04/1997	Findings:	2.500 PCI/L
Chemical:	GROSS ALPHA		
Sample Collected:	06/04/1997	Findings:	1.100 PCI/L
Chemical:	GROSS ALPHA COUNTING ERROR		
Sample Collected:	06/04/1997	Findings:	.900 UG/L
Chemical:	TRICHLOROETHYLENE		
Sample Collected:	07/28/1997	Findings:	7.560 PCI/L
Chemical:	GROSS ALPHA		
Sample Collected:	07/28/1997	Findings:	2.250 PCI/L
Chemical:	GROSS ALPHA COUNTING ERROR		
Sample Collected:	07/28/1997	Findings:	690.000 UMHO
Chemical:	SPECIFIC CONDUCTANCE		
Sample Collected:	07/28/1997	Findings:	7.530
Chemical:	PH (LABORATORY)		
Sample Collected:	07/28/1997	Findings:	196.000 MG/L
Chemical:	TOTAL ALKALINITY (AS CACO3)		
Sample Collected:	07/28/1997	Findings:	239.000 MG/L
Chemical:	BICARBONATE ALKALINITY		
Sample Collected:	07/28/1997	Findings:	269.000 MG/L
Chemical:	TOTAL HARDNESS (AS CACO3)		
Sample Collected:	07/28/1997	Findings:	75.900 MG/L
Chemical:	CALCIUM		
Sample Collected:	07/28/1997	Findings:	19.300 MG/L
Chemical:	MAGNESIUM		
Sample Collected:	07/28/1997	Findings:	48.700 MG/L
Chemical:	SODIUM		
Sample Collected:	07/28/1997	Findings:	3.640 MG/L
Chemical:	POTASSIUM		
Sample Collected:	07/28/1997	Findings:	38.100 MG/L
Chemical:	CHLORIDE		
Sample Collected:	07/28/1997	Findings:	.980 UG/L
Chemical:	TRICHLOROETHYLENE		
Sample Collected:	07/28/1997	Findings:	418.000 MG/L
Chemical:	TOTAL DISSOLVED SOLIDS		
Sample Collected:	07/28/1997	Findings:	.100 NTU
Chemical:	TURBIDITY (LAB)		
Sample Collected:	11/17/1997	Findings:	5.360 PCI/L
Chemical:	GROSS ALPHA		
Sample Collected:	11/17/1997	Findings:	1.980 PCI/L
Chemical:	GROSS ALPHA COUNTING ERROR		
Sample Collected:	11/17/1997	Findings:	3.510 PCI/L
Chemical:	URANIUM		
Sample Collected:	11/17/1997	Findings:	.900 PCI/L
Chemical:	URANIUM COUNTING ERROR		

GEOCHECK® - PHYSICAL SETTING SOURCE MAP FINDINGS

Map ID
Direction
Distance
Elevation | Database | EDR ID Number

C6
SE
1/2 - 1 Mile
Lower | CA WELLS | 2903

Water System Information:

Prime Station Code:	02S/13W-10M01 S	User ID:	MET
FRDS Number:	1910077008	County:	Los Angeles
District Number:	15	Station Type:	WELL/AMBNT/MUN/INTAKE/SUPPLY
Water Type:	Well/Groundwater	Well Status:	Destroyed
Source Lat/Long:	340000.0 1181400.0	Precision:	Undefined
Source Name:	ROSS WELL 03 - DESTROYED		
System Number:	1910077		
System Name:	SCWC - FLORENCE/GRAHAM		
Organization That Operates System:	P.O. BOX 9016 ST SAN DIMAS, CA 91773		
Pop Served:	26863	Connections:	9350
Area Served:	FLORENCE GRAHAM		

B7
ESE
1/2 - 1 Mile
Lower | FRDS PWS | CA1910167

PWS ID:	CA1910167	PWS Status:	Not Reported
Date Initiated:	Not Reported	Date Deactivated:	Not Reported
PWS Name:	VERNON-CITY, WATER DEPT. VERNON, CA 90058		
Addressee / Facility:	Not Reported		
Facility Latitude:	34 00 14	Facility Longitude:	118 13 45
City Served:	VERNON		
Treatment Class:	Mixed (treated and untreated)	Population:	46000

PWS currently has or had major violation(s) or enforcement: No

---

8
ESE
1/2 - 1 Mile
Lower | FED USGS | USGS3156213

Agency cd:	USGS	Site no:	340016118134001
Site name:	002S013W10Q008S		
Latitude:	340016		
Longitude:	1181340	Dec lat:	34.00445846
Dec lon:	-118.22868399	Coor meth:	M
Coor accr:	S	Latlong datum:	NAD27
Dec latlong datum:	NAD83	District:	06
State:	06	County:	037
Country:	US	Land net:	Not Reported
Location map:	LOS ANGELES	Map scale:	24000

Altitude:	195	Altitude method:	M
Altitude accuracy:	5.0	Altitude datum:	NGVD29
Hydrologic:	Los Angeles, California, Area = 819 sq.mi.		
Topographic:	Valley flat		
Site type:	Ground-water other than Spring	Date construction:	19620310
Date inventoried:	19961122	Mean greenwich time offset:	PST
Local standard time flag:	Y		
Type of ground water site:	Single well, other than collector or Ranney type		
Aquifer Type:	Not Reported		
Aquifer:	Not Reported		
Well depth:	1248	Hole depth:	1248
Source of depth data:	driller	Project number:	7-4706-51200
Real time data flag:	Not Reported	Daily flow data begin date:	Not Reported
Daily flow data end date:	Not Reported	Daily flow data count:	Not Reported
Peak flow data begin date:	Not Reported	Peak flow data end date:	Not Reported
Peak flow data count:	Not Reported	Water quality data begin date:	Not Reported
Water quality data end data:	Not Reported	Water quality data count:	Not Reported
Ground water data begin date:	Not Reported	Ground water data end date:	Not Reported
Ground water data count:	Not Reported		

Ground-water levels, Number of Measurements: 0

9
SSE **FED USGS** **USGS3156183**
1/2 - 1 Mile
Lower

Agency cd:	USGS	Site no:	335947118140401
Site name:	002S013W15E002S		
Latitude:	335947.43		
Longitude:	1181404.45	Dec lat:	33.99652268
Dec lon:	-118.23547579	Coor meth:	G
Coor accr:	5	Latlong datum:	NAD27
Dec latlong datum:	NAD83	District:	06
State:	06	County:	037
Country:	US	Land net:	Not Reported
Location map:	SOUTH GATE	Map scale:	24000
Altitude:	Not Reported	Altitude method:	Not Reported
Altitude accuracy:	Not Reported	Altitude datum:	Not Reported
Hydrologic:	Los Angeles, California, Area = 819 sq.mi.		
Topographic:	Not Reported		
Site type:	Ground-water other than Spring	Date construction:	Not Reported
Date inventoried:	Not Reported	Mean greenwich time offset:	PST
Local standard time flag:	Y		
Type of ground water site:	Single well, other than collector or Ranney type		
Aquifer Type:	Not Reported		
Aquifer:	Not Reported		
Well depth:	1361	Hole depth:	1443
Source of depth data:	Not Reported	Project number:	9479335800
Real time data flag:	0	Daily flow data begin date:	0000-00-00
Daily flow data end date:	0000-00-00	Daily flow data count:	0
Peak flow data begin date:	0000-00-00	Peak flow data end date:	0000-00-00
Peak flow data count:	0	Water quality data begin date:	2000-10-25
Water quality data end date:	2000-10-25	Water quality data count:	1
Ground water data begin date:	0000-00-00	Ground water data end date:	0000-00-00
Ground water data count:	0		

Ground-water levels, Number of Measurements: 0

GEOCHECK® - PHYSICAL SETTING SOURCE MAP FINDINGS

Map ID Direction Distance Elevation		Database	EDR ID Number
10 ESE 1/2 - 1 Mile Lower		FED USGS	USGS3156205

Agency cd:	USGS	Site no:	340006118133901
Site name:	002S013W15B004S		
Latitude:	340006		
Longitude:	1181339	Dec lat:	34.0016808
Dec lon:	-118.22840618	Coor meth:	M
Coor accr:	S	Latlong datum:	NAD27
Dec latlong datum:	NAD83	District:	06
State:	06	County:	037
Country:	US	Land net:	Not Reported
Location map:	LOS ANGELES	Map scale:	24000
Altitude:	195	Altitude method:	M
Altitude accuracy:	5.0	Altitude datum:	NGVD29
Hydrologic:	Los Angeles. California. Area = 819 sq.mi.		
Topographic:	Valley flat		
Site type:	Ground-water other than Spring	Date construction:	19400419
Date inventoried:	19961122	Mean greenwich time offset:	PST
Local standard time flag:	Y		
Type of ground water site:	Single well, other than collector or Ranney type		
Aquifer Type:	Not Reported		
Aquifer:	Not Reported		
Well depth:	1232	Hole depth:	1232
Source of depth data:	driller	Project number:	7-4706-51200
Real time data flag:	Not Reported	Daily flow data begin date:	Not Reported
Daily flow data end date:	Not Reported	Daily flow data count:	Not Reported
Peak flow data begin date:	Not Reported	Peak flow data end date:	Not Reported
Peak flow data count:	Not Reported	Water quality data begin date:	Not Reported
Water quality data end date:	Not Reported	Water quality data count:	Not Reported
Ground water data begin date:	Not Reported	Ground water data end date:	Not Reported
Ground water data count:	Not Reported		

Ground-water levels, Number of Measurements: 0

11 West 1/2 - 1 Mile Lower	Site ID:	900570061	AQUIFLOW	55204
	Groundwater Flow:	Not Reported		
	Shallow Water Depth:	8.37		
	Deep Water Depth:	12		
	Average Water Depth:	Not Reported		
	Date:	08/07/1996		

GEOCHECK® - PHYSICAL SETTING SOURCE MAP FINDINGS
RADON

AREA RADON INFORMATION

Federal EPA Radon Zone for LOS ANGELES County: 2

Note: Zone 1 indoor average level > 4 pCi/L.
: Zone 2 indoor average level >= 2 pCi/L and <= 4 pCi/L.
: Zone 3 indoor average level < 2 pCi/L.

Federal Area Radon Information for LOS ANGELES COUNTY, CA

Number of sites tested: 63

Area	Average Activity	% <4 pCi/L	% 4-20 pCi/L	% >20 pCi/L
Living Area - 1st Floor	0.711 pCi/L	98%	2%	0%
Living Area - 2nd Floor	Not Reported	Not Reported	Not Reported	Not Reported
Basement	0.933 pCi/L	100%	0%	0%

PHYSICAL SETTING SOURCE RECORDS SEARCHED

TOPOGRAPHIC INFORMATION

USGS 7.5' Digital Elevation Model (DEM)
Source: United States Geologic Survey
EDR acquired the USGS 7.5' Digital Elevation Model in 2002 and updated it in 2006. The 7.5 minute DEM corresponds to the USGS 1:24,000- and 1:25,000-scale topographic quadrangle maps. The DEM provides elevation data with consistent elevation units and projection.

HYDROLOGIC INFORMATION

Flood Zone Data: This data, available in select counties across the country, was obtained by EDR in 1999 from the Federal Emergency Management Agency (FEMA). Data depicts 100-year and 500-year flood zones as defined by FEMA.

NWI: National Wetlands Inventory. This data, available in select counties across the country, was obtained by EDR in 2002 from the U.S. Fish and Wildlife Service.

HYDROGEOLOGIC INFORMATION

AQUIFLOW^R Information System
Source: EDR proprietary database of groundwater flow information
EDR has developed the AQUIFLOW Information System (AIS) to provide data on the general direction of groundwater flow at specific points. EDR has reviewed reports submitted to regulatory authorities at select sites and has extracted the date of the report, hydrogeologically determined groundwater flow direction and depth to water table information.

GEOLOGIC INFORMATION

Geologic Age and Rock Stratigraphic Unit
Source: P.G. Schruben, R.E. Arndt and W.J. Bawiec, Geology of the Conterminous U.S. at 1:2,500,000 Scale - A digital representation of the 1974 P.B. King and H.M. Beikman Map, USGS Digital Data Series DDS - 11 (1994).

STATSGO: State Soil Geographic Database
Source: Department of Agriculture, Natural Resources Conservation Services
The U.S. Department of Agriculture's (USDA) Natural Resources Conservation Service (NRCS) leads the national Conservation Soil Survey (NCSS) and is responsible for collecting, storing, maintaining and distributing soil survey information for privately owned lands in the United States. A soil map in a soil survey is a representation of soil patterns in a landscape. Soil maps for STATSGO are compiled by generalizing more detailed (SSURGO) soil survey maps.

SSURGO: Soil Survey Geographic Database
Source: Department of Agriculture, Natural Resources Conservation Services (NRCS)
Telephone: 800-672-5559
SSURGO is the most detailed level of mapping done by the Natural Resources Conservation Services, mapping scales generally range from 1:12,000 to 1:63,360. Field mapping methods using national standards are used to construct the soil maps in the Soil Survey Geographic (SSURGO) database. SSURGO digitizing duplicates the original soil survey maps. This level of mapping is designed for use by landowners, townships and county natural resource planning and management.

LOCAL / REGIONAL WATER AGENCY RECORDS

FEDERAL WATER WELLS

PWS: Public Water Systems
Source: EPA/Office of Drinking Water
Telephone: 202-564-3750
Public Water System data from the Federal Reporting Data System. A PWS is any water system which provides water to at least 25 people for at least 60 days annually. PWSs provide water from wells, rivers and other sources.

PWS ENF: Public Water Systems Violation and Enforcement Data
Source: EPA/Office of Drinking Water
Telephone: 202-564-3750
Violation and Enforcement data for Public Water Systems from the Safe Drinking Water Information System (SDWIS) after August 1995. Prior to August 1995, the data came from the Federal Reporting Data System (FRDS).

USGS Water Wells: USGS National Water Inventory System (NWIS)
This database contains descriptive information on sites where the USGS collects or has collected data on surface water and/or groundwater. The groundwater data includes information on wells, springs, and other sources of groundwater.

STATE RECORDS

California Drinking Water Quality Database
Source: Department of Health Services
Telephone: 916-324-2319
The database includes all drinking water compliance and special studies monitoring for the state of California since 1984. It consists of over 3,200,000 individual analyses along with well and water system information.

OTHER STATE DATABASE INFORMATION

California Oil and Gas Well Locations for District 2, 3, 5 and 6
Source: Department of Conservation
Telephone: 916-323-1779

RADON

State Database: CA Radon
Source: Department of Health Services
Telephone: 916-324-2208
Radon Database for California

Area Radon Information
Source: USGS
Telephone: 703-356-4020
The National Radon Database has been developed by the U.S. Environmental Protection Agency (USEPA) and is a compilation of the EPA/State Residential Radon Survey and the National Residential Radon Survey. The study covers the years 1986 - 1992. Where necessary data has been supplemented by information collected at private sources such as universities and research institutions.

EPA Radon Zones
Source: EPA
Telephone: 703-356-4020
Sections 307 & 309 of IRAA directed EPA to list and identify areas of U.S. with the potential for elevated indoor radon levels.

OTHER

Airport Landing Facilities: Private and public use landing facilities
Source: Federal Aviation Administration, 800-457-6656

Epicenters: World earthquake epicenters, Richter 5 or greater
Source: Department of Commerce, National Oceanic and Atmospheric Administration

California Earthquake Fault Lines: The fault lines displayed on EDR's Topographic map are digitized quaternary fault lines, prepared in 1975 by the United State Geological Survey. Additional information (also from 1975) regarding activity at specific fault lines comes from California's Preliminary Fault Activity Map prepared by the California Division of Mines and Geology.

PHYSICAL SETTING SOURCE RECORDS SEARCHED

STREET AND ADDRESS INFORMATION

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APPENDIX D
CITY OF LOS ANGELES FIRE DEPARTMENT RECORDS

HARTCROWSER
Earth and Environmental Technologies

Hart Crowser, Inc.
One World Trade Center, Suite 2300
Long Beach, California 90831-2300
FAX (310) 495-6381
(310) 495-6360

FAX Transmittal

DATE: March 27, 1996 RECIPIENTS FAX NO.: (213) 237-0321

SEND TO: **Duane Houston** NO. OF PAGES (including FAX form): 1

COMPANY: **City of Los Angeles Bureau of Fire Prevention, Underground Tanks Unit**

RECIPIENTS DIRECT TELEPHONE NO.: (213) 237-0600

SENDER'S NAME Paul Short JOB NO.: 6769

MESSAGE:

Inspector Houston,

This transmittal is provided to certify that Paul Short is a Registered Geologist in the State of California (RG# 6237, Expires 8/96). Paul Short performed oversight and soil sampling/description for the job described below:

1786 East Martin Luther King Jr. Blvd.
6,000 gallon steel diesel underground storage tank

LAFD Permit No.4572

Tank was removed and soils were sampled on March 7, 1996.

Paul Short

THIS MESSAGE IS INTENDED ONLY FOR THE USE OF THE INDIVIDUAL OR ENTITY TO WHICH IT IS ADDRESSED AND MAY CONTAIN INFORMATION THAT IS CONFIDENTIAL OR OTHERWISE EXEMPT FORM DISCLOSURE TO OTHERS UNDER APPLICABLE LAW. If the reader of this message is not the intended recipient, or the employee or agent responsible for delivering the message to the intended recipient, please recognize that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this communication in error, please notify us immediately by telephone, and return the original message to us at the above address via the United States Postal Service. Thank you.

PLEASE CONTACT (310) 495-6360 IF THERE ARE ANY TRANSMITTAL DIFFICULTIES.

ORDINANCE NO. 169880

An Ordinance transferring the management, supervision, and control of certain real property referred to as the "Lancer site" located at 41st Street and Alameda Street from the Department of Public Works of the City of Los Angeles to the Harbor Department of the City of Los Angeles.

THE PEOPLE OF THE CITY OF LOS ANGELES
DO ORDAIN AS FOLLOWS:

Section 1. Management, supervision and control over that certain real property belonging to the City of Los Angeles and referred to as the "Lancer site" located at 41st Street and Alameda Street is hereby transferred from the Department of Public Works of the City of Los Angeles to the Board of Harbor Commissioners of the City of Los Angeles.

Section 2. Said transfer of jurisdiction is made upon the condition that the value of said real property hereby found to be the sum of Thirteen Million Three Hundred Thousand Dollars ($13,300,000) shall be paid by I.S.D. Inter-Departmental order made payable to the City of Los Angeles.

Section 3. The real property hereby transferred is located in the City of Los Angeles, County of Los Angeles, State of California, and is more particularly described as follows:

Lots 38-82, 81-130, 149-171, East Jefferson Street Tract No. 1.

The total area of the above-described parcels of land is approximately 11.78 acres.

Section 4. The City Clerk shall certify to the passage of this ordinance and cause the same to be published in some daily newspaper printed and published in the City of Los Angeles.

I hereby certify that the foregoing ordinance was introduced at the meeting of the Council of the City of Los Angeles JUN 07 1994 and was passed at its meeting of JUN 14 1994

Approved JUN 20 1994

City Clerk
By _____
Deputy

Mayor

APPROVED AS TO FORM AND LEGALITY

JAMES K. HAHN, City Attorney

By _____
WINSTON F. TYLER, Asst. Assistant

CNS1156699
6/22, 6/23

WFT:aj

File No.: 93-0600-535

CITY OF LOS ANGELES

HARBOR DEPARTMENT

Resolution No. 5378

BUDGET APPROPRIATION

BE IT RESOLVED by the Board of Harbor Commissioners of the City of Los Angeles:

That the transfer of $13.3 million dollars is hereby appropriated from the Unappropriated Fund Balance to Property Acquisition Account, Account 59993, Center 1800, to provide funds for the Lancer Site acquisition.

I HEREBY CERTIFY that the foregoing is a full, true and correct copy of a resolution adopted by the Board of Harbor Commissioners of the City of Los Angeles

on February 9, 1994

Secretary

```
TYPE= LD  ASSR ID NO= 5117 019 902     SBN NO =
                                FILE NO= 50  UPDATE= 01/07/96     DATE= 01/09/96
ASSR ID NO                VC    REC DT  TRF PRICE # DOC NO   OC1 OC2 DT  INT   DRC
5117 019 902 8  CURRENT: 1 860501-50          9 1 9999999   3   7   K 00%-0  Z
                SALE  1: B 820622-50          1
                SALE  2:
REG   CC   USE
 27 27873 8800
  PARCEL STATUS    TS  TY   SCP  TRA  HOX KEY HOX AMT CLAIM TYPE     REX AMOUNT
ACTIVE              3          00007                  INACTIVE
NAME                                                                PCL CRT DT
L A CITY                                                              1860501

SPECIAL NAME: NO SPECIAL NAME ON FILE                               PCL DEL DT
SITUS ADDRESS                                                         0000000
 1838     E MARTIN LUTHER KING JR BLVD                LOS ANGELES CA
MAIL ADDRESS                                         90011 0000

.. L E G A L   D E S C R I P T I O N ...
EAST JEFFERSON STREET TRACT NO 1 (EX OF                NUMBER OF
STY LOTS 38,39 ALL OF LOTS 40 THRU 50   N              LEGAL DESCRIPTION LINES   2

  PF1 = INQ SEL;    6 = NEWS;    9 = ACCUM TXN;    10 = MENU;    11 = EXIT
```

LOS ANGELES CITY FIRE DEPARTMENT
DIVISION- 5 PERMIT - ATMOSPHERIC UNDERGROUND TANK

Div 5-714/715	LAFD FACILITY I.D.	FIRE STATION #	ENFORCEMENT INSPECTOR
290107-67	NEW	46	HOUSTON

LOCATION INFORMATION

▼ FD USE ONLY ▼

Doing Business As	Date Granted:	PERMIT#
L.A. HARBOR DEPT. PORT OF LOS ANGELES (PAUL STARK)	2-1-96	4572
EPA # CAC 001157752	Date Expires: 2-1-97	

Address	Phone #
1786 E. MARTIN LUTHER KING BLVD	(310) 495-6361

City:	State:	Zip:
LOS ANGELES	CA	

PROPERTY OWNER

Name:	Phone:
LOSANGELES HARBOR DEPT. PORT OF LOS ANGELES	(310) 732-7678
Address: 425 S. PALOS VERDES ST.	
City: SAN PEDRO State: CA	Zip: 90731
Print Name:	Signature:

CONTRACTOR INFORMATION

Name:	Phone:
PETRO BUILDERS, INC.	(310) 946-2885
Address: 10600 PAINTER AVE.	
City: B. F. SPRINGS State: CA	Zip: 90670

CITY BUSINESS #	STATE CONTRACTORS #	WORK COMP #
0049127-70	241905	3516845

Print Name:	Signature:	Title:
JOSE LA VAZQUEZ	Jose La Vazquez	AGENT

ITEM	QTY	
UGT/S ABANDONMENT BY REMOVAL	1	61000 FUEL TANK,
UGT/S TANK ENTRY/ LINING/ REPAIR		
UGT/S ABANDONMENT IN PLACE		
UGT/S INSTALLATION		
UGT/S ADD TO /ALTER: MONITORING		
UGT/S ADD TO/ ALTER: PIPING /DISPENSER		

Inspector Signature:

TERM-ID: NB10 M A S T E R I N F O R M A T I O N DATE: 02/01/96

BTRC STATUS: NONE

0290107-67
ED P-FILE GEO F-OIL
E

EMPOWERMENT ZONE:

1 TANK REGISTERED 5 PAID FOR 1996
JRamirez 2/1/96

LN: PORT OF LOS ANGELES
BT:
BA: 1786 E MARTIN LUTHER KING JR BL
LOS ANGELES CA 90058

CITY CLERK, CITY OF LOS ANGELES
BY
DATE 2-1-96

FD/CC	MC	SIC	START-DT	O-B-DT	LIAB -DT	BCH-DI	BCH-NO
F 715	G				12/13/95	01 19998 0744	

State of California—Environmental Protection Agency
Form Approved OMB No. 2050-0039 (Expires 9-30-96)
Please print or type. Form designed for use on elite (12-pitch) typewriter.

See Instructions on back of page 6.

Department of Toxic Substances Control
Sacramento, California

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. CAD980813836 Manifest Document No. 90101 1

2. Page 1 of 1

Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
Port of Los Angeles
425 South Palos Verdes Street
San Pedro CA 90733

4. Generator's Phone (310) 732-3683

5. Transporter 1 Company Name: MIETO AND SONS TRUCKING, INC.

6. US EPA ID Number: CAT080016116

7. Transporter 2 Company Name

8. US EPA ID Number

9. Designated Facility Name and Site Address
2008 N. ALAMEDA
COMPTON, CA 90222

10. US EPA ID Number: CAT080013352

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	12. Containers Type	13. Total Quantity	14. Unit Wt/Vol	
a. NON RCRA HAZARDOUS WASTE LIQUID	001	TT	XXX75	G	
b.					
c.					
d.					

NO SMOKING
WEAR APPROPRIATE PROTECTIVE CLOTHING
EMERGENCY TELEPHONE # (714) 956-8853

15. Special Handling Instructions and Additional Information
CROSBY & OVERTON
1630 W. 17th STREET - 310-432-5445
LONG BEACH, CA 90813 CAD028409019

alternate disposal sites:
• ENVIROPUR WEST CORPORATION
• 1835 E. 29th STREET 310-595-7431
• SIGNAL HILL, CA 90806 CAT080011039

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

GENERATOR

Printed/Typed Name	Signature	Month	Day	Year
		12	10	96

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year
		12	10	96

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name	Signature	Month	Day	Year

DO NOT WRITE BELOW THIS LINE.

IN CASE OF EMERGENCY OR SPILL, CALL THE NATIONAL RESPONSE CENTER 1-800-424-8802; WITHIN CALIFORNIA, CALL 1-800-852-7550

DTSC 8022A (1/95)
EPA 8700—22

Yellow: GENERATOR RETAINS

TANK CERTIFICATION REPORT

[redacted]

TANK REMOVAL CERTIFICATE #: 04016

Date: 3/7/96

Permit #: LAFD 9[illegible]

Site: [illegible]

Address of tank: 1[illegible] E Main [illegible] Ave

[illegible] Angeles CA

Client: [illegible]

TANK SIZE	TANK MATERIAL	PREVIOUS CONTENTS	LAST CONTENTS
[illegible]	[illegible]	[illegible]	[illegible]

The tank(s) described above has/have been inspected and found to be gas free based on readings obtained with an MSA type 2A Explosivity Meter (LEL of zero percent). A visual inspection has been made of the interior of the tank(s) and no visible contamination has been observed except as noted below.

EXCEPTION: N

THE AMERICAN BOARD OF INDUSTRIAL HYGIENE INCORPORATED CERT. NO. 11973 1433

[redacted]

CLIENT COPY White | CTL COPY Green | FIRE DEPARTMENT COPY Canary | TRANSPORTERS COPY Pink | TRANSPORTERS COPY Goldenrod

ABANDONMENT info. sheet

STATUS OF TANKS ON SITE
A. Have all tanks been abandoned on this site? (YES) or NO - How many tanks left? ☐
B. Are any tanks going to be installed on this site in the future? YES - How many? ☐ or (NO)

ROUTING INSPECTORS - Insert ONE copy in each of the following:
1. Div 5 package (original) 2. Inspection blue book 3. Data entry 4. Haz Mat Box F.S. 21 Fac. No. ____

Site address 1786 E M.L. KING	Inspection District No. 386	Division 5 permit No. 4572	
Inspector name HOUSTON	Inspector No. 386	Date of abandonment 3-7-96	
Contractor PETRO BUILD	Resp Person JOANNE	Phone no.	

TANK INFORMATION

Facility/Tank I.D. no.	Tank size Metal or FRP(circle)	Product	Soils test	No. of samples	Soil color of tank bed, pile, trench, or pit	Tank condition: Holes	Final LEL
1	6K (M) F	DIE	8020, 8015, 7420	2	NMR	NONE	0
2	M / F						
3	M / F						
4	M / F						
5	M / F						
6	M / F						
Soils pile				2		Destination of tanks: AMR	
Piping trench				0			
Dispenser pit				0			

Describe excavation: Odor NONE Liquid in hole NO Other

DOCUMENTS: NECESSARY FOR A COMPLETE PACKAGE

ABANDONMENT METHOD (CHECK)	WASH	HAZARD WASTE	FILL IN PLACE	Documents 30 day
Abandonment info sheet	✓			
Time log - Site specific sheet	✓			Due date
Division 5 permit, application, and plot plans	✓			
Cleaning certificates	✓			Collect on-site
Uniform manifest: rinse liquid or tank	rinse ✓	tank	rinse	Collect on-site
Uniform manifest - Piping that is not flushed	N/A			Collect on-site
Certificate of disposal - Tank	✓			
Certificate of disposal - Piping	N/A			
Soil Analysis Report	✓			
Chain of custody	✓			
Plot plan - showing locations of samples	✓			
Division 4 fire permit registration - for tanks discovered on site, that have not been previously paid for.				

SOILS REPORT INFORMATION mg/kg - per million ug/kg - per billion

	Action level	Enter highest reading in mg/kg		Exceeds Action level
TPH	100 PPM (mg/kg)	ND	PPM	YES (NO)
Benzene	1 PPM (mg/kg)	ND	PPM	YES (NO)
Toluene	50 PPM (mg/kg)	ND	PPM	YES (NO)
Xylene	50 PPM (mg/kg)	ND	PPM	YES (NO)
Ethyuene	50 PPM (mg/kg)	ND	PPM	YES (NO)
Total lead	0-200 PPM above bkgrd	5	(PPM)	YES (NO)
Water samples	anything detected		mg/kg ug/kg	YES NO

Misc. comments

Package completion & forwarding date: 4-10-96

○ Check here for comments on back

PETRO BUILDERS, INC.
CONTRACTOR IN FUEL SYSTEMS, FUEL FACILITIES AND ENVIRONMENTAL CONSTRUCTION

PETRO BUILDERS, INC. TEL: (310) 946-2285 • FAX: (310) 946-5395

March 25, 1996

CITY OF LOS ANGELES FIRE DEPARTMENT
UNDERGROUND STORAGE TANK DIVISION
200 N. Main St.
Los Angeles Ca 90012

RECEIVED
APR 1 0 1996
UNDERGROUND STORAGE TANK

Attention: Inspector Houston

Reference: City of Los Angeles Port Authority Property - Tank Removal
Permit #4572
1786 E. Martin Luther King Blvd.

Dear Inspector Houston,

Attached please find copies of the following documents for the above referenced project:

Permits	City of Los Angeles Fire Dept., Engineering Dept., and Building and Safety Dept.
Manifest	A copy of the manifest showing the receiving signature at the disposal facility (Demenno-Kerdoon)
Soil Analysis	A copy of the sample analysis results along with a chain of custody and a plot plan showing sample locations.
Tank Certificate	A copy of the tank clean certificate (C.T.L. Environmental)
Tank Destruction	A certificate of destruction from A.M.R.
Reports	A copy of the stamped compaction report

With the attached completed, we ask you to kindly close-the referenced file in your system.

If you have any questions regarding the attached information, please do not hesitate to give me a call.

Respectfully submitted
PETRO BUILDERS, INC.

Joanna M. Shultz
R. E. A.



cc: Paul Short / Hart Crowser

Attachments
JMS:imv

LOS ANGELES CITY FIRE DEPARTMENT
DIVISION- 5 PERMIT - ATMOSPHERIC UNDERGROUND TANK

Div 5-714/715	LAFD FACILITY I.D.	FIRE STATION #	ENFORCEMENT INSPECTO
290107-67	NEW	46	Houston

LOCATION INFORMATION

▼ TO USE ONLY ▼

Doing Business As L.A. HARBOR DEPT. PORT OF LOS ANGELES (PAUL SHAT)

Date Granted: 2-1-96

Date Expires: 2-1-97

PERMIT# 4572

EPA # CAC 001157752

Address: 1786 E. MARTIN LUTHER KING BLVD

Phone # (310) 495-6361

City: LOS ANGELES State: CA 3-8 Zip: 12:00

PROPERTY OWNER

Name: LOS ANGELES HARBOR DEPT. PORT OF LOS ANGELES Phone: (310) 732-7678

Address: 425 S. PALOS VERDES ST.

City: SAN PEDRO State: CA Zip: 90731

Print Name: Signature:

CONTRACTOR INFORMATION

Name: PETRO Buildings, INC. Phone: (310) 946-2285

Address: 10609 PAINTER AVE.

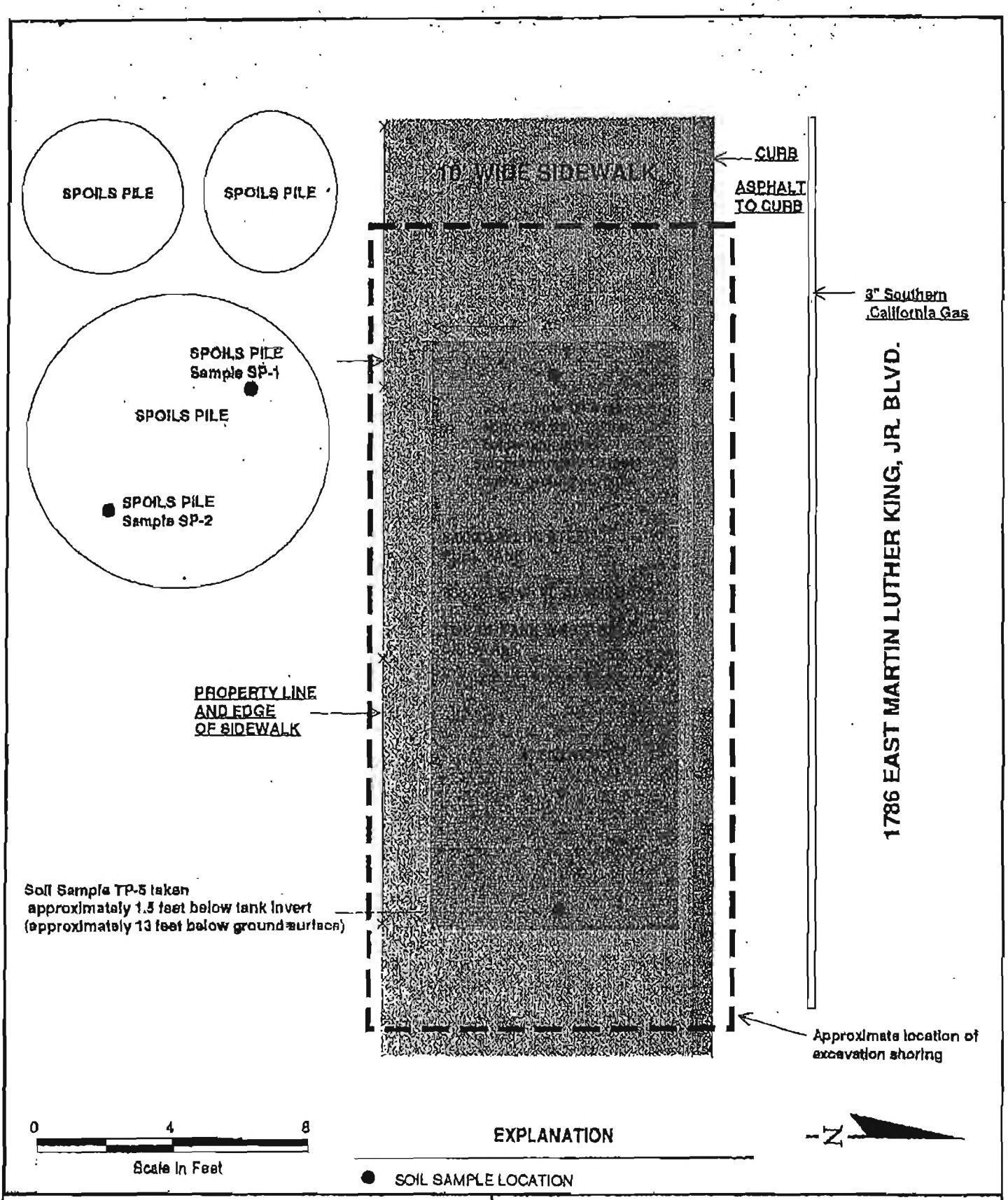
City: S. F. SPRINGS State: CA Zip: 90670

CITY BUSINESS #	STATE CONTRACTORS #	WORK COMP #
0049127-76	241905	3516245

Print Name:	Signature:	Title:
JOSE LA VAZQUEZ	Jose La Vazquez	AGENT

ITEM	QTY	
UGT/S ABANDONMENT BY REMOVAL	1	6000 FUEL TANK,
UGT/S TANK ENTRY/ LINING/ REPAIR		
UGT/S ABANDONMENT IN PLACE		
UGT/S INSTALLATION		
UGT/S ADD TO /ALTER: MONITORING		
UGT/S ADD TO/ ALTER: PIPING /DISPENSER		

Inspector Signature:



HARTCROWSER

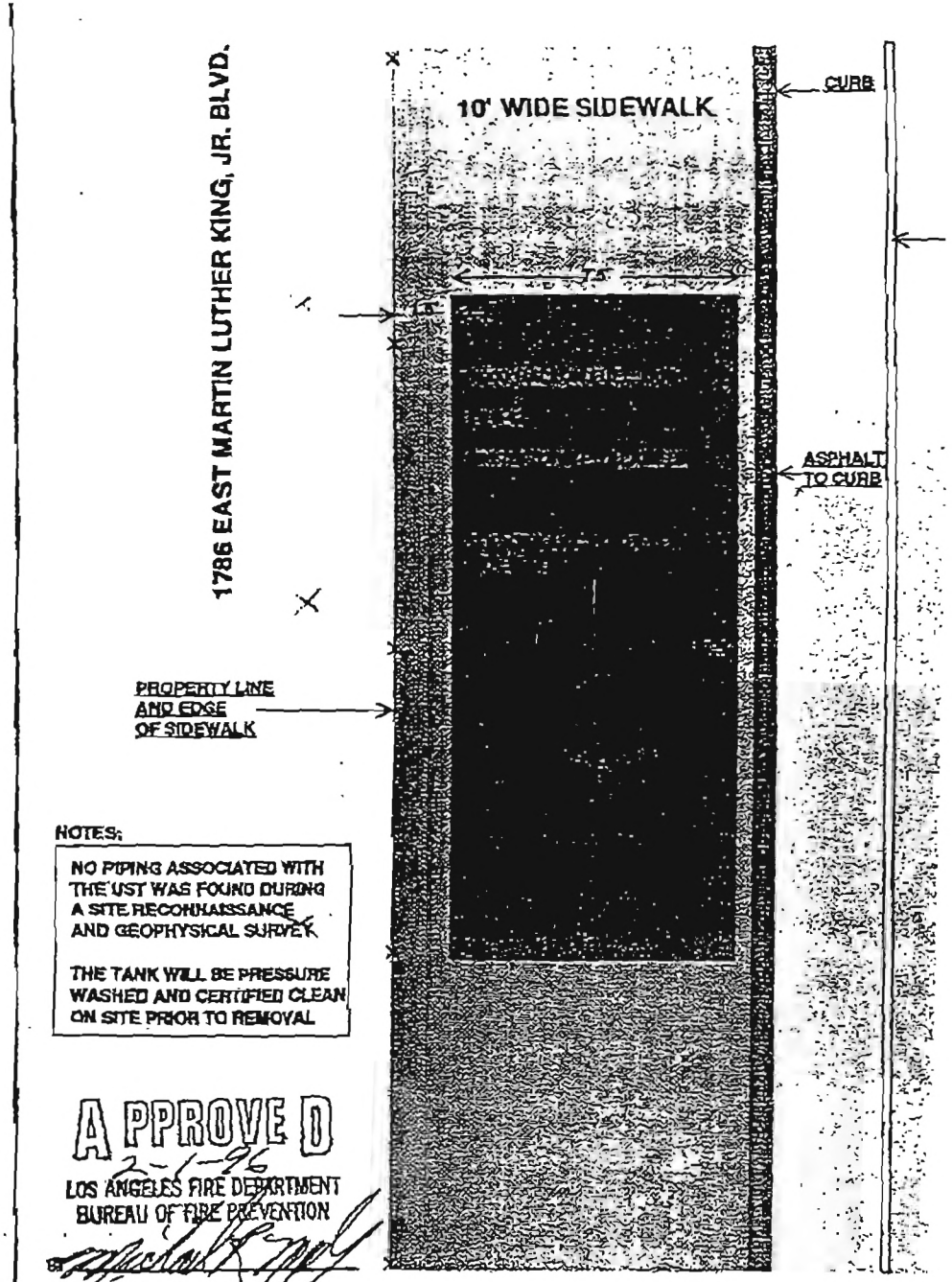
PROJECT NAME: Lancer UST Closure

SAMPLE LOCATION MAP

PROJECT NO.: 6769

DATE: March 1996

FIGURE 1


1786 EAST MARTIN LUTHER KING, JR. BLVD.
10' WIDE SIDEWALK
CURB
ASPHALT TO CURB
PROPERTY LINE AND EDGE OF SIDEWALK
NOTES:
NO PIPING ASSOCIATED WITH THE UST WAS FOUND DURING A SITE RECONNAISSANCE AND GEOPHYSICAL SURVEY.
THE TANK WILL BE PRESSURE WASHED AND CERTIFIED CLEAN ON SITE PRIOR TO REMOVAL
APPROVED
2-1-96
LOS ANGELES FIRE DEPARTMENT
BUREAU OF FIRE PREVENTION
#4572
N
0
4
8
Scale in Feet

City of Los Angeles
Dept. of Public Works
Bureau of Engineering
78-3.882 (R9-89)

APPLICATION/PERMIT FOR EXCAVATIONS

IN OR ADJACENT TO PUBLIC STREETS
UNDER CHAPTER 6, ARTICLE 2, LOS ANGELES MUNICIPAL CODE

THIS PERMIT NOT VALID UNLESS REGISTER VALIDATED OR RECEIPT SHOWN

JOB ADDRESS
1786 E. MARTIN LUTHER KING JR. BLVD

PROPERTY OWNER/CONTRACTOR/AGENT FOR
PETRO BUILDERS, INC.

MAIL ADDRESS
15609 PAINTER AVENUE

CITY OR TOWN
SANTA FE SPRINGS

ZIP CODE
CA 90670

TELEPHONE
310 946-2285

PURPOSE OF EXCAVATION
ONE (1) TANK REMOVAL

WORK ORDER NO.	LIAB. INS. C.A. NO.	INSURANCE EXPIRES
B1002648	CA094353	2-13-96

"A" PERMIT NO.	SURETY BOND C.A. NO.	MISC. RECEIPT NO.
A9650-0147		

ARE STREETS NOW BEING IMPROVED?	WAIVER REC. NO.	MISC. CASH BOND NO.
☐ YES ☐ NO		

PLAT FILED?	REPORT NO.
☐ YES ☐ NO	

NOTICE TO PERMITTEE

PERMIT MUST BE ON JOB AT ALL TIMES.

THIS PERMIT EXPIRES 6 MONTHS FROM ISSUANCE UNLESS WORK HAS COMMENCED. (LAMC 62.02)

KEEP SIDEWALKS AND GUTTERS CLEAR.

NOTIFY FIRE AND POLICE DEPT. 48 HOURS BEFORE STARTING WORK WHICH BLOCKS ANY STREET.

INSPECTION IS REQUIRED

See Instructions 5 and 9 on back

I hereby agree to observe all requirements of the Municipal Code of the City of Los Angeles, all amendments thereto, and any special requirements made part of this permit.

X

PRINT NAME

JOB ADDRESS
1786 E.

RECEIPT NO.

MUST CALL
FOR INSPECTION
213-580-5080
24 hr. before
Start of work

02/28/96 00436 110 151 1

STATE D.I.S. PERMIT NO.

EXCAVATION SIZE AND TYPE

CONC. CURB	AI $	LIN. FT.	$	
CONC. WALK	MIN. AI $	LIN. FT.	$	30.00
CONC. GUTTER	AI $	LIN. FT.	$	
PAVEMENT	AI $	LIN. FT.	$	
DIRT	AI $	LIN. FT.	$	
ROCK & OIL	AI $	LIN. FT.	$	
TOTAL SPECIAL DEPOSIT			$	
SPECIAL INSPECTION ____ HOURS ____ DAYS AT ____ PER HOUR DAY				
TESTING RELATIVE COMPACTION	AT	EA.		
STANDARD DENSITY	AT	EA.		
PLAN CHECK	2 HOUR MIN.			1.00
	7½ HR			29.96
TOTAL SPEC. INSP., etc.				
TOTAL AMOUNT			$	30.96

BY
RUEY
BUREAU OF ENGINEERING

2-27-96
DATE

STREETS AFFECTED

CITY OF
LOS ANGELES
PUBLIC WORKS

BUREAU OF ENGINEERING WORK ORDER

Work Order Unit 807-485-3877 or 808 E. Spring St., 2nd Flr.

Order: E

96 | Close Date: | Final Close Date:

LUTHER JR 1786 | Dpt Title:

EN | Major Project:: E P R I V | Program:: 0 4 0 0 | Dist/Div: E6201 5 0

Fund: 100 | Reimb. Flag (Y) or N | Elig Pct:

Restrict Flag: Y or (N) | D/I Ind: (D) or I

rig Proj: E P R I V G E N | Other Depts: 7 6

CF: | Supercedes W.O: | Rev Date:

Comments:) Tank REMOVAL | Plan Check #:

2/13/96

PERMIT #
E1002648
007832510150
SPECIAL WORK ORDER
$100.00
CHECK 1000.00

1 # OF ITEMS IPT: CH1 DATED 2-13-96 $ 1000.00

007437 110 RGI 11:58
THANK YOU

IPT: CH1 DATED $

R OF W.O. FEE

PERMIT #
E1002648
007832510150
SPECIAL WORK ORDER
$10
007832510150 (CHECK) 1000.

DILORIZO, INC. (FIELD ACCOUNT)
10807 S PAINTER AVENUE
SANTA FE SPRINGS, CA 90670

1 # OF ITEMS
02/13/96 007437 110 RGI

Project Engineer Name: RAMZY SAWAYA | Phone: 485-3877

Estimated By: | Submitted By: FRANK V. BONOFF

Reviewed By: | Admin Div: John M. Franco

Approved By: Robert S. Horii

Item		Estimate Cost	Suggested Financing				Direct L Char
Design							
Construction							
Tot Contr Cost							
R/W Estimate							
Pre const	Survey						
	Misc						
Post Award	Swy/Eng						
	Inspect						
Tot Dir Labor							
City Ovrhd Cost		DEPOSIT					1.0

A-9650-0147

City of Los Angeles
Dept. of Public Works
Bureau of Engineering
76-3.068 (R 4/89)

PRINT OR TYPE

CLASS "A" APPLICATION / PERMIT

For the Construction of Curbs, Driveways, Sidewalks and other Structures in Public Streets

MUST CALL FOR INSPECTION 213-580-5080 24 hr. before Start of Work

1. Engineering Permittee
2. Bonded Contr. Ac
3. Contract Adm.

APPLICANT/PERMITTEE

PERMIT NO. A

PETRO BUILDERS, INC.

ADDRESS

10609 PAINTER AVENUE

CITY | ZIP CODE | TELEPHONE

SANTA FE SPRINGS | CA 90670 | 310-946-2285

I hereby agree to observe all requirements of the Municipal Code of the City of Los Angeles, all amendments thereto, and any special requirements made a part of this permit.

X _____ DATE _____

RECEIPT NUMBER

6351(ORG)

CHECK

PAY TO THE ORDER OF BANK OF AMERICA
DEPOSIT TO CITY TR DEPT REG AC 10557
CHECK RETURNED ITEMS TO 10557-00

NOTE: Dimensions may be obtained from City Records—Plan No. XXXXXX S610-21

WRITTEN BY

HUEY

VALIDATION TIME

7-27-96 MARTIN

IF TREE REMOVAL IS NECESSARY, THIS PERMIT IS VOID UNLESS A TREE REMOVAL PERMIT IS ISSUED BY THE BUREAU OF STREET MAINTENANCE.

Curb face to/from edge of walk	FT. IN.
Width of sidewalk	FT. IN.
Back edge of walk to property line	FT. IN.
Curb face to property line	FT. IN.
Height of Curb face (Subject to field check)	FT. IN.

FRONTAGE STREET: MARTIN LUTHER KING

INTERSECTING STREE: ALAMEDA B

SUBTOTA
SURCHARGE 2
SURCHARGE 7
CHECK 115

STD. PLAN NO. S610-21

WORK DESCRIPTION OR REMARKS ☐ NEW ☐ REPAIR ☐ RESURFACING X

RESURFACE ONE (1) TANK REMOVAL. BACKFILL CEMENT SLURRY OR 90% COMPACTION.

RESTORE PAVING TO ORIGINAL CONDITIONS. PER E9650-0015. CHARGE TO E1002618.

1 # OF CHGS
02/28/96 007615 1(0) PM

RESURFACING: ☐ St. Maint. ☐ Permittee X Sewer Permit No.

IF PARKING METER TO BE REMOVED, CALL D.O.T.

MUST PROVIDE ACCESS FOR PEDESTRIANS & JOIN NEW CONST. TO EXIST. AC PAVEMENT

NOTIFY "B" PERMITS	YES	NO

INSTRUCTIONS AND SPECIFIC REQUIREMENTS FOR PERMITTEES GENERAL

1. A copy of the permit must be on the job at all times.
2. All changes in sketches and permit limits must have prior approval.
3. The numbers to call for inspection are as follows:
   Job location in the San Fernando Valley: (818) 989-8335
   Job location elsewhere: [redacted]
   Must call before noon on workday before inspection required.
4. Notify the inspection and issuing offices immediately if the starting time is changed.
5. Pedestrian and vehicular access must be maintained at all times.
6. All work must comply with the latest edition of the pamphlet, "Work Area Traffic Control."
7. Barricades and lights must be on the job from start of removals to completion of work.
8. If the barricades, protective devices, etc., are not furnished as required the City of Los Angeles may, at its option, provide them. The minimum charge for this service is $50 per day.
9. No backfill is to be placed without prior approval of inspector.
10. No concrete shall be poured without prior approval of the inspector.
11. Driveway apron construction must join existing pavement.

THIS PERMIT EXPIRES IN 180 DAYS

ITEM		QUANTITY	UNIT	RATE	FEE
CONC. CURB			LIN. FT.		$
CONC. GUTTER			SQ. FT.		
CONC. DRIVEWAY			SQ. FT.		
CONC. SIDEWALK			SQ. FT.		
SUBTOTAL					

ITEM	QUANTITY	RATE	D.O.T. PROJECT NO.	TOTAL D.O.T. FEE
Pkg. Mtr. Removal		Ea.		$

Case No.	DRIVEWAYS		
W =			
Y =		BASIC FEE	106.
X =		21 SC	2.
a =		SURCHARGE 7% SC	7.
f =			
SKETCH ATTACHED _____		TOTAL FEE	$ 115.

JOB ADDRESS

1786 E. MARTIN LUTHER KING JR. BLVD

PERMIT NUMBER

A- 9650-0147

Hart Crowser

California—Environmental Protection Agency
Approved OMB No. 2050-0039 (Expires 9-30-96)
Please print or type. Form designed for use on elite (12-pitch) typewriter.

See Instructions on back of page 6.

Department of Toxic Substances Control
Sacramento, California

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.	Manifest Document No.	2. Page 1 of	Information in the shaded areas is not required by Federal law.
CAD980813826	90101	1	

3. Generator's Name and Mailing Address
Port of Los Angeles
425 South Palos Verdes Street
San Pedro CA 90733

4. Generator's Phone (310) 732-3083

5. Transporter 1 Company Name	6. US EPA ID Number
RIETO AND SONS TRUCKING, INC.	CAT000616116
7. Transporter 2 Company Name	8. US EPA ID Number
9. Designated Facility Name and Site Address	10. US EPA ID Number
2000 N. ALAMEDA COMPTON, CA 90222	CAT080013352

11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	12. Containers Type	13. Total Quantity	14. Unit Wt./Vol.
a. NON RCRA HAZARDOUS WASTE LIQUID	001	TT	00175	G
b.				
c.				
d.				

13. Special Handling Instructions and Additional Information
CRUCIBLE OVERTON
1630 W. 17th STREET - 310-432-5445
LONG BEACH, CA 90813 CAD982409819

alternate = ENVIROPUR WEST CORPORATION
disposal = 1835 E. 29th STREET 310-595-7431
alternate = SIGNAL HILL, CA 90806 CAT000611839

15. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name	Signature	Month	Day	Year
CHRISTOPHER J. FOLEY		01	31	96

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year
RICHARD LUCERO		01	31	96

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year

19. Discrepancy Indication Space

20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name	Signature	Month	Day	Year
Michael Timms		01	31	96

DO NOT WRITE BELOW THIS LINE.

IN CASE OF EMERGENCY OR SPILL, CALL THE NATIONAL RESPONSE CENTER 1-800-424-8802; WITHIN CALIFORNIA, CALL 1-800-852-7550

GENERATOR

TRANSPORTER

FACILITY

15382 U3

DTSC 8022A (1/93)

Sample Custody Record

DATE 3/7/96 PAGE 1 OF 1

Hart Crowser, Inc.
One World Trade Center, Suite 2300
Long Beach, California 90831-2300
HART CROWSER

JOB NUMBER 6769 LAB NUMBER

PROJECT MANAGER Paul Short

PROJECT NAME Lonker Tank Closure

SAMPLED BY: Paul Short Paul Short

LAB NO.	SAMPLE	TIME	STATION	MATRIX	TESTING: 8015 - Diesel	TESTING: 8020 - BTEX	TESTING: 7420 - Total Lead	NO. OF CONTAINERS	OBSERVATIONS/COMMENTS/ COMPOSITING INSTRUCTIONS
	TP-4	13:45	13'	Soil	X	X	X	1	Standard TAT
	TP-5	13:50	13'	Soil	X	X	X	1	But results
	SP-1	13:55	–	Soil	X	X	X	1	Faxed ASAP
	SP-2	14:00	–	Soil	X	X	X	1	
									Required Detection Limits:
									8015 100 ppm or better
									Benzene 1 ppm or better
									T,E,X 50 ppm or better
Call	Paul Short @ 310 495-6360								
if	any questions								

RELINQUISHED BY	DATE	RECEIVED BY	DATE
Paul Short		[illegible]	3/7/96
SIGNATURE		SIGNATURE	
Paul Short	TIME	[illegible]	TIME
PRINTED NAME		PRINTED NAME	2:54
Hart Crowser		[illegible]	
COMPANY		COMPANY	

RELINQUISHED BY	DATE	RECEIVED BY	DATE
SIGNATURE		SIGNATURE	
	TIME		TIME
PRINTED NAME		PRINTED NAME	
COMPANY		COMPANY	

TOTAL NUMBER OF CONTAINERS: 4

METHOD OF SHIPMENT:

SPECIAL SHIPMENT/HANDLING OR STORAGE REQUIREMENTS:

DISTRIBUTION:

1. PROVIDE WHITE AND YELLOW COPIES TO LABORATORY
2. RETURN PINK COPY TO PROJECT MANAGER
3. LABORATORY TO FILL IN SAMPLE NUMBER AND SIGN FOR RECEIPT
4. LABORATORY TO RETURN WHITE COPY TO HART CROWSER

+310-495-6361 HARTCROWSER

Applied P & Ch Laboratory
13760 Magnolia Ave. Chino CA 91710
Tel: (909) 590-1828 Fax: (909) 590-1498

APCL Analytical Report

Submitted to:
Hart Crowser, Inc. (Long Beach)
Attention: Paul Short
One World Trade Center, Ste. 2
Long Beach CA 90831-2300
Tel: (310)495-6360 Fax: (310)495-6361

Service ID #: 801-961785
Collected by: Paul Short
Collected on: 03/07/96

Received: 03/08/96
Extracted: 03/11/96
Tested: 03/08-15/96
Reported: 03/19/96

Sample Description: Soil
Project Description: Lancer Tank Closure/ Job#6769

Analysis of Soil Samples

Component Analyzed	Method	Unit	PQL	Analysis Result SP-1 96-01785-1	SP-2 96-01785-2	TP-4 96-01785-3	TP-5 96-01785-4
Lead, Total, by AA	239.1	mg/kg	4	N.D.	5	N.D.	N.D.
Benz. Tolu. Xylen. Ethylbenz. (BTXE)							
Benzene	8020	µg/kg	5	N.D.	N.D.	N.D.	N.D.
Ethylbenzene	8020	µg/kg	5	N.D.	N.D.	N.D.	N.D.
Toluene	8020	µg/kg	5	N.D.	N.D.	N.D.	N.D.
o-Xylene	8020	µg/kg	5	N.D.	N.D.	N.D.	N.D.
m/p-Xylene	8020	µg/kg	5	N.D.	N.D.	N.D.	N.D.
TPH: Diesel	LUFT-B	mg/kg	10	N.D.	N.D.	N.D.	N.D.

PQL: Practical Quantitation Limit. MDL: Method Detection Limit. CRDL: Contract Required Detection Limit
N.D.: Not Detected or less than the practical quantitation limit. "-": Analysis is not required.
J: Reported below PQL.

Respectfully submitted,

Dominic Lau
Laboratory Director
Applied P & Ch Laboratory

CADHS ELAP No.: 1431

Applied P & Ch Laboratory
13780 Magnolia Ave. Chino CA 91710
Tel: (909) 590-1828 Fax: (909) 590-1498

APCL QA/QC Report

Submitted to:
Hart Crowser, Inc. (Long Beach)
Attention: Paul Short
One World Trade Center, Ste. 2
Long Beach, CA 90831-2300
Tel: (310)495-6360 Fax: (310)495-6361

Service ID #: 801-961785
Collected by: Paul Short
Collected on: 03/07/96
Sample description:
Soil
Project: Lancer Tank Closure / Job#6769

Received: 03/08/96
Tested: 03/08-15/96
Reported: 03/20/96

Analysis of Soil Samples

801-961785QC

Component Name	Analysis Batch #	CCV mg/L	CCV %Rec	M-Blank mg/kg	SP Level mg/kg	LCS %Rec	MS %Rec	MSD %Rec	MS/MSD %RPD	Control Limit %Rec	Control Limit %Diff
Metals in Soil by 6010/7000											
Lead, Pb	96M1308	3.5	104	N.D.	150	101	103	104	2	75-125	20

Component Name	Analysis Batch #	CCV mg/L	CCV %Rec	M-Blank mg/kg	SP Level mg/kg	LCS %Rec	MS %Rec	MSD %Rec	MS/MSD %RPD	Control Limit %Rec	Control Limit %Diff
TPH in Soil by GC/FID (M8015)											
Diesel	96G1551	1000	107	N.D.	500	105	102	110	8	65-135	35

Component Name	Analysis Batch #	CCV mg/L	CCV %Rec	M-Blank mg/kg	SP Level mg/kg	LCS %Rec	MS %Rec	MSD %Rec	MS/MSD %RPD	Control Limit %Rec	Control Limit %Diff
BETX in Soil by GC/PID (8020)											
Benzene	96G1545	0.100	104	N.D.	0.50	93	86	98	13	65-135	25
Toluene	96G1545	0.100	108	N.D.	2.00	105	97	110	13	65-135	25
Ethylbenene	96G1545	0.100	107	N.D.	0.475	96	88	106	13	65-135	25
p/m-Xylene	96G1545	0.200	112	N.D.	2.05	106	101	114	12	65-135	25
o-Xylene	96G1545	0.100	107	N.D.	0.675	109	100	114	13	65-135	25

Notation:
ICV – Initial Calibration Verification
CCV – Continuation Calibration Verification
LCS – Lab Control Spike
MS – Matrix Spike
MSD – Matrix Spike Duplicate
ICS – Interference Check Standard
MD – Matrix Duplicate
N.D. – Not detected or less than PQL
CCB – Continuation Calibration Blank
M-blank – Method Blank
SP Level – Spike Level
%Rec – Recovery Percent
%RPD – Relative Percent Differences
%Diff – Control Limit for %RPD
ICP-SD – ICP Serial Dilution
N.A. – Not Applicable

Respectfully submitted,

Kevin Xie
QA/QC Director
Applied P & Ch Laboratory

AMERICAN METAL RECYCLING, INC. FUEL TANK

2202 South Milliken Avenue
Ontario, CA 91761
(714) 988-8000

RECEIVED
MAR 19 1996
DISPOSED

No. 44182

TANK DISPOSAL FORM

Date: 3-7 ,19 96
Job #
P. O. #

CONTRACTOR: H-J Cowser.
ADDRESS:
JOB SITE: Vacant Lot
ADDRESS: 1769 E. Martin Luther King Jr. Blvd. CA. CA
DESTINATION: A.M.R. 2202 S. Milliken Ave., Ontario, CA 91761

DATE	TIME	PROJECTED TANKS	ORDERED BY:	LIC. NO.

SPECIAL INSTRUCTIONS: c/o Nielsen

TIME IN:
TIME OUT:

✓	Services Rendered	Cost
___	Disposal Fee	200.00
___	Extensive Loading Time	150.00
___	Disposal Fee with Permit	300.00
___	Fiberglass Tank Disposal Fee Per Tank	400.00
___	Fiberglass Tank Delivered	200.00
___	Bobtail Disposal Fee	250.00
___	Cancellation Fee	250.00
	TOTAL CHARGES	$ 0.00

All fees incurred are per load unless specified. Terms are net 30 days from date of invoice. Contractor's signature represents acceptance of terms for payment, and confirms that tank removal complies with State laws.

CONTRACTOR'S SIGNATURE

TANKS RECEIVED

QTY	GALLONS	TYPE F* S*	NET TONS	TOTAL
	280		.14	
	500		.21	
	550		.24	
	1000 - 2 ft.		.41	
	1000 - 6 ft.		.61	
	1200		.87	
	2000		.97	
	2500		1.16	
	3000		1.92	
	4000		1.92	
	5000		2.42	
	6000		2.84	
	7500		3.26	
	8000		3.42	
	9000		3.82	
	10000		4.33	
	12000		4.93	

NO. OF TANKS: 1 TOTAL NET TONS:

*F — FIBERGLASS *S — STEEL TOP

CERTIFICATE OF TANK DISPOSAL / DESTRUCTION

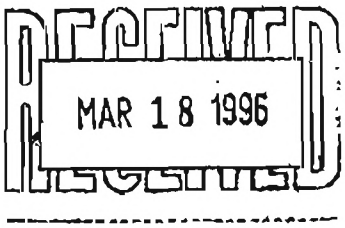
THIS IS TO CERTIFY THE RECEIPT AND ACCEPTANCE OF THE TANK(S) AS SPECIFIED ABOVE. ALL MATERIALS SPECIFIED HAVE BEEN COMPLETELY DESTROYED FOR SCRAP PURPOSES ONLY.

AUTHORIZED REP. DATE

STRATA-TECH, INC.
GEOTECHNICAL CONSULTANTS
7372 Walnut Avenue, Unit F, Buena Park, California 90620 • 714-521-5611 • 310-427-8099 • FAX 714-521-2652

March 13, 1996

W.O. 88796



Drew Associates
c/o Petro Builders, Inc.
10609 Painter Avenue
Santa Fe Springs, CA 90670

Subject: Final Compaction Report for Backfill of an Underground Storage Tank Removal Area, L.A. Port Authority Property, Sidewalk Area near 1788 Martin Luther King Blvd., Los Angeles, California

Gentlemen:

In accordance with your request, this geotechnical report has been prepared. The report summarizes our observations and testing during excavation and backfill of a UST removal area at the subject site.

OBSERVATION

Observations of the grading operations were performed on March 8 and 9, 1996.

The bottom of the excavation was observed by the City Grading Inspector. A concrete saddle was abandoned in place, approved by the City Inspector. The bottom of the excavation was approved at a depth of 11 feet by a representative of STRATA-TECH, Inc.

Subsequent backfill soils were placed in six to eight inch lifts and compacted by use of a vibratory plate attachment to a backhoe.

TESTING

Maximum density optimum moisture relationship determinations were performed for each soil type encountered during grading operations. Test results were as follows:

Laboratory Standard: (ASTM:D-1557-91)
4 inch dia. mold; 1/30 cu.ft.vol.;
5 layers-25 blows per layer;
10 lb. hammer dropped 18 inches

Soil Type	Classification	Optimum Moisture Percent	Max. Dry Density Lbs./Cu.Ft.
I (Import)	Tan brown gravelly sand	8.0	132.0

Compaction tests were performed a minimum of every two feet and/or 500 cubic yards of compacted fill soils placed. These tests were performed in accordance with ASTM:D-1556-90 (sand cone) test methods. The test results are summarized in Table I. The approximate test locations are shown on Plate I.

Areas not tested were probed to show adequate compaction.

OPINION

The fill is adequately compacted to support a pavement section. The design of a pavement section is not within the scope of this report.

We appreciate this opportunity to be of service to you.

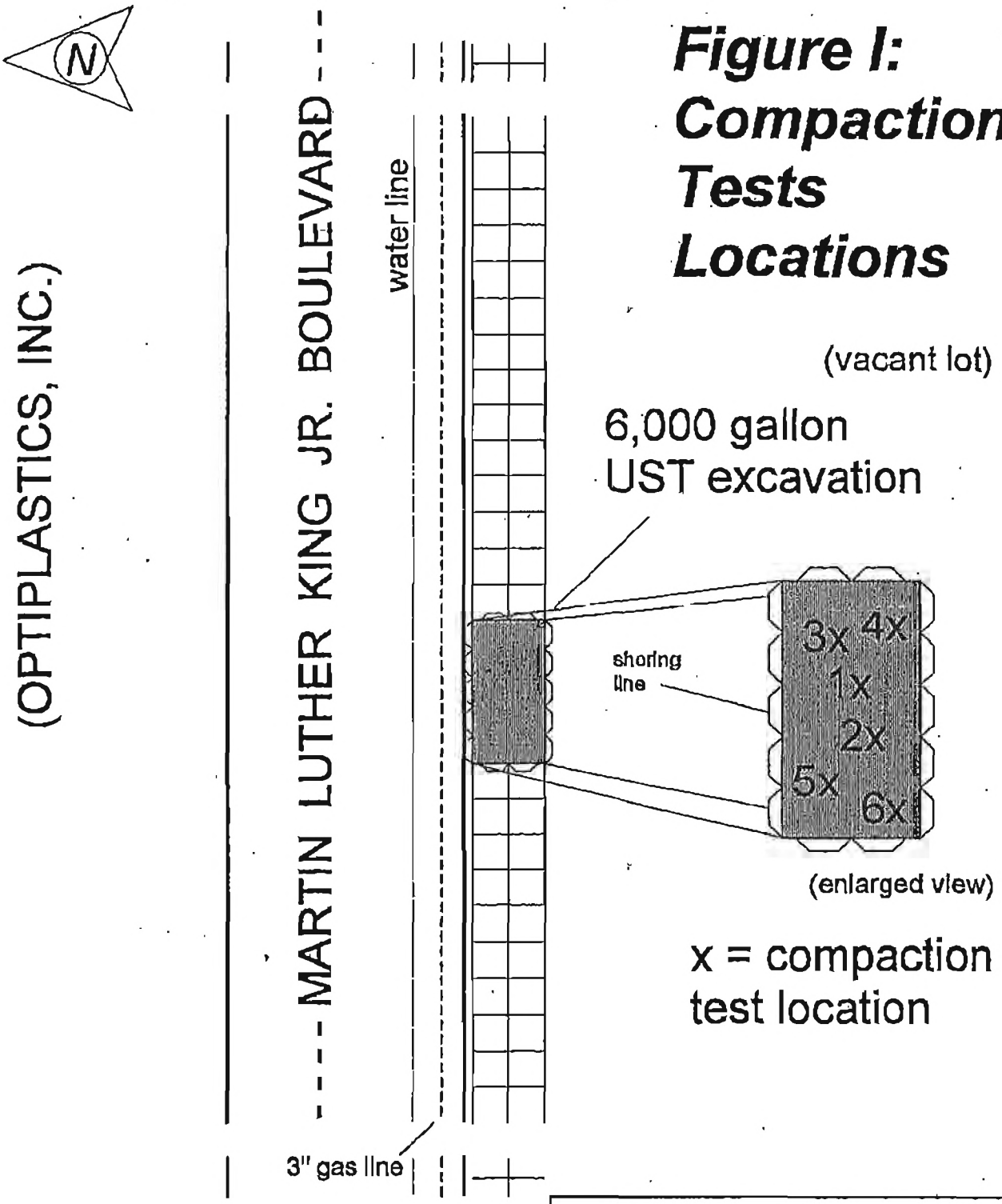
Respectfully Submitted:
STRATA-TECH, INC.

Bruce A. [illegible]
RGE 6[illegible]

REGISTERED PROFESSIONAL ENGINEER
BRUCE A. PACKARD
No. 662
Exp. 3/31/97
GEOTECHNICAL
STATE OF CALIFORNIA

BAP/ko

Figure I: Compaction Tests Locations



NOTE: This sketch is not a survey; it is schematic in nature and is intended only for the illustration of data. The indicated scale is approximate and is presented for rough measurement only.

STRATA-TECH, INC.

W.O.	SCALE	DATE
88796	1" = 20'	3/13/96

Test No.	Location	Below Proposed Grade (Ft.)	Moisture Percent	Dry Unit Weight (Lbs./Cu.Ft.)	Soil Type	Relative Compaction	Date of Test
1	See Figure 1	9.0	8.8	124.6	1	94	3/8/96
2	See Figure 1	7.0	7.6	122.7	1	93	3/9/96
3	See Figure 1	5.0	7.2	124.1	1	94	3/9/96
4	See Figure 1	3.0	6.9	121.7	1	92	3/9/96
5	See Figure 1	2.0	7.4	122.4	1	93	3/9/96
6	See Figure 1	S.G.	6.7	122.6	1	93	3/9/96

TABLE 1

W.O. 88796

CITY OF LOS ANGELES

DEPARTMENT OF BUILDING AND SAFETY

ENGINEER'S CERTIFICATE OF COMPLIANCE FOR COMPACTED EARTH FILLS

LOCATION OF FILL: L.A. Port Authority property: Lancer site, Lots 38-62, 81-130, 149-173, E. Jefferson Street Tract No. 1

JOB ADDRESS: (sidewalk area) 1786 Martin Luther King Jr. Boulevard, Los Angeles, California

SOIL TESTING AGENCY: STRATA-TECH, Inc.

PROPERTY OWNER'S NAME: L.A. Port Authority

OWNER'S ADDRESS:

PER REPORTS ON OUR PROJECT NO: W.O. 88796

DATE WORK COMMENCED ON PROJECT: March 8, 1996

DATE FILL WAS COMPLETED: March 9, 1996

DATE OF THIS CERTIFICATE: March 14, 1996

TO THE SUPERINTENDENT OF BUILDING:

the placing of compacted earth fill on the above describe property, and on the basis of these inspections and tests it is my opinion that the same was placed in conformity with the requirements of the Los Angeles City Building Code.

REGISTERED PROFESSIONAL ENGINEER BRUCE A. PACKARD No. 662 GEOTECHNICAL STATE OF CALIFORNIA

CALIFORNIA CERTIFICATE NO. RGE 662

*For the purpose of this Certificate, to "have personally inspected and tested" shall include inspection and testing performed by any person responsible to the licensed engineer signing this certificate. Where the inspection and testing of all or part of the work above is delegated, fully responsibility shall be assumed by the licensed engineer whose signature is affixed thereon.

F-580—2500 Sets—7-70 (F-79)

Fire Department
City of Los Angeles

PERMIT

Granted 8/28/73

Expires 8/28/74

Reg. No. 1415

Fee Paid $15.00

In accordance with terms of the application on file with the Fire Prevention Bureau, permission is granted to:

Name Utility Trailer Sales Co.

Mail to B. R. Higbie
3729 E. Florence Ave.
Bell, Calif. 90201

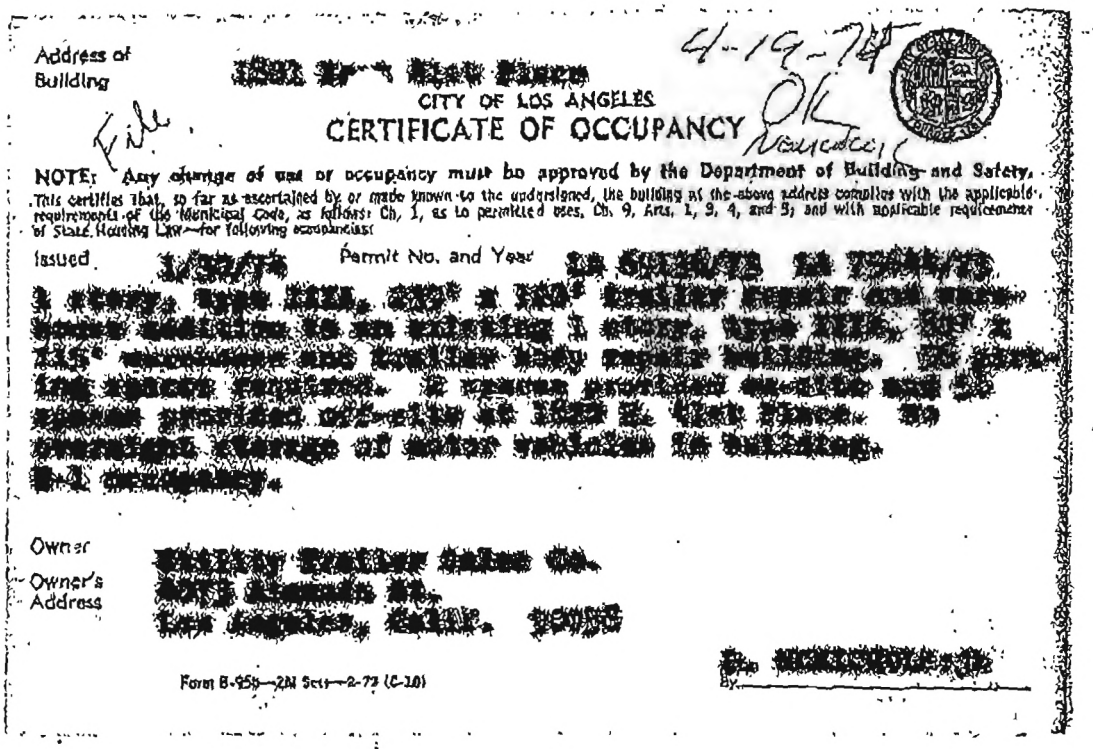
Permit to: Install 2 Atmospheric Tanks shop built as per plans and specifications submitted to the Fire Prevention Bureau.

Location 1801 East 41st Street

BY ORDER OF CHIEF ENGINEER

By [signature] Inspector

FINAL GRANTED
AUG 28 1974



Address of Building [redacted]

4-19-74 OK

CITY OF LOS ANGELES

CERTIFICATE OF OCCUPANCY

File

NOTE: Any change of use or occupancy must be approved by the Department of Building and Safety.

This certifies that, so far as ascertained by or made known to the undersigned, the building at the above address complies with the applicable requirements of the Municipal Code, as follows: Ch. 1, as to permitted uses, Ch. 9, Arts. 1, 2, 4, and 5; and with applicable requirements of State Housing Law—for following occupancies:

Issued [redacted] Permit No. and Year [redacted]

[redacted]

Owner [redacted]

Owner's Address [redacted]

Form B-958—2M Sept—2-73 (C-10)

By [redacted]

May 3 2006 11:10 P.03

Fax:2139783616

LAFD

Form 526.1 (a) Rev.

APPLICATION FOR FIRE PERMIT

OFFICE OF THE CITY CLERK — LOS ANGELES

NAME OF OWNER(S) UTILITY TRAIL CO. CORP.

DOING BUSINESS AS UTILITY TRAILER CO.

BUSINESS ADDRESS OR LOCATION DESCRIPTION 1801 E. 41st. PL.

MAILING ADDRESS 4073 SO. ALAMEDA CA 90058

TYPE OF BUSINESS AUTO Building Mfg. 702 DATE STARTED 11-30-73 TELEPHONE NUMBER 233-3721

NO. OF VEHICLES	CLASSIFICATION CODE	NEW OR TRANSFER	MAXIMUM CAPACITY	MAX. QUANTITY HAZARDOUS MATERIAL	OIL WELLS LAFD No.
702	702				13194

FEES

Permit Fee $ 2475

Penalty $ _____

Total $ 2475

NOTICE TO APPLY: You are hereby directed to apply and pay the required fee to the City Clerk for a Fire Permit on or before MARCH 13 1974 or penalty will apply.

Issued by: J. W. NEMACHIK (INSPECTOR) Date 2-22-74

APPROVED: James W. Nemachik Date 2/22/74

APPLICATION FOR PERMIT: I hereby declare that I am the owner of the above business or authorized representative of the owner and that I am in charge of the business, operation, occupation or premises described herein. I agree to comply with all Regulations, Laws or Ordinances pertaining to or regulating such business that are now in effect or may hereafter be adopted.

SIGNATURE OF APPLICANT [signature] Title Owner Date 2/22/74

OFFICE COLLECTION	INSPECTOR REPORT	OFFICE BILLING
Fee $ _____	Fee $ _____	Fee $ _____
Penalty _____	Penalty _____	Penalty _____
Total _____	Total _____	Total _____

F 28883-702

PERMIT NUMBER

DEPUTY CITY CLERK

TO BILLING UNIT — INITIAL / DATE

NO BILLING REQUIRED — INITIAL / DATE

LAFD

Fax:2139783616 May 5 2006 11:11 P.04

Form 326.1 (a)—Rev. 7-70—3M Sets (M-45-46)

APPLICATION FOR FIRE PERMIT

OFFICE OF THE CITY CLERK — LOS ANGELES

FEES

NAME OF OWNER(S) UTILITY TRAILER SALES CO /C	B
DOING BUSINESS AS NONE	Permit Fee $ 24.75
BUSINESS ADDRESS OR LOCATION DESCRIPTION 1801 E 41ST PL L A	Penalty $
MAILING ADDRESS 4073 S ALAMEDA ST 2N 5F	Total $ 24.75
TYPE OF BUSINESS AUTO FUELING STATION — DATE STARTED 11-30-73	TELEPHONE NUMBER 233 3264

CLASSIFICATION CODE	NEW OR TRANSFER	MAXIMUM CAPACITY	MAX. QUANTITY—HAZARDOUS MATERIAL	OIL WELL LEASE No.
F 704				

NOTICE TO APPLY: You are hereby directed to apply and pay the required fee to the City Clerk for a Fire Permit on or before _____ or penalty will apply.

Issued by: _____ (INSPECTOR) Date _____

APPROVED: _____ Date _____

APPLICATION FOR PERMIT: I hereby declare that I am the owner of the above business or authorized representative of the owner and that I am in charge of the business, operation, occupation or premises described herein. I agree to comply with all Regulations, Laws or Ordinances pertaining to or regulating such business that are now in effect or that may be hereafter adopted.

SIGNATURE OF APPLICANT _____

Title Vice Pres. Date 1-24-74

OFFICE COLLECTION	INSPECTOR REPORT	OFFICE BILLING
Fee $ _____	Fee $ _____	Fee $ _____
Penalty _____	Penalty _____	Penalty _____
Total _____	Total _____	Total _____

P. _____ (PERMIT NUMBER) — J Kalm 1-24-74 (DEPUTY CITY CLERK)

TO BILLING UNIT — INITIAL _____ DATE _____

NO BILLING REQUIRED — INITIAL _____ DATE _____

PLEASE BILL - 1801 E 41ST PL L A 90011 (213) 233-3264 ATTN: JAN

LAFD

Fax:2139783616 May 3 2006 11:11 P.05

Form 526.2(a)—Rev. 7-70—6M Sets (M-45-46)

APPLICATION FOR FIRE PERMIT

OFFICE OF THE CITY CLERK — LOS ANGELES

FEES

NAME OF OWNER(S) UTILITY TRAILER SALES CO /C	
DOING BUSINESS AS NONE	Permit Fee $ 24.75
BUSINESS ADDRESS OR LOCATION DESCRIPTION 1801 E 41ST PL. L A	Penalty $
MAILING ADDRESS 4073 S ALAMEDA ST 2N 5F	Total $ 24.75
TYPE OF BUSINESS AUTO FUELING STATION — DATE STARTED 11-30-73	TELEPHONE NUMBER 233 3221

B

CLASSIFICATION CODE	NEW OR TRANSFER	MAXIMUM CAPACITY	MAX. QUANTITY—HAZARDOUS MATERIAL	OIL WELL, LAFD No.
F 702				

NOTICE TO APPLY: You are hereby directed to apply and pay the required fee to the City Clerk for a Fire Permit on or before _____ or penalty will apply.

Issued by: _____ Date _____
INSPECTOR

APPROVED: _____ Date _____

APPLICATION FOR PERMIT: I hereby declare that I am the owner of the above business or authorized representative of the owner and that I am in charge of the business, operation, occupation or premises described herein. I agree to comply with all Regulations, Laws or Ordinances pertaining to or regulating such business that are now in effect or that may be hereafter adopted.

SIGNATURE OF APPLICANT _____

Title Vice Pres Date 1-24-74

OFFICE COLLECTION	INSPECTOR REPORT	OFFICE BILLING
Fee $ _____	Fee $ _____	Fee $ _____
Penalty _____	Penalty _____	Penalty _____
Total _____	Total _____	Total _____

F — PERMIT NUMBER

J Kahn 1-24-74 — DEPUTY CITY CLERK

TO BILLING UNIT — INITIAL _____ DATE _____

NO BILLING REQUIRED — INITIAL _____ DATE _____

PLEASE FILL-IN 7 13692-1/16/74 AT MA

LAFD Fax:2139783616 May 3 2006 11:11 P.06

DEPARTMENT OF BUILDING AND SAFETY: Date: 5-1-74

The following applicant has applied for a Fire Permit to conduct a(n)
AUTO FUELING STATION
at the location shown below:

UTILITY TRAILER CO CORP

DBA 1801 E 41ST PL L A

DBA 4073 E ALAMEDA ST LB 88

F2[illegible]-TOZ

Unless notified to the contrary within ten (10) calendar days, the Fire Department will assume that this applicant has met all zoning and other Department of Building and Safety regulations and requirements pertinent to the issuance of a FIRE PERMIT and will accordingly take action on said application.

RAYMOND M. HILL
Chief Engineer
Fire Department

May 3 2006 11:11 P.07
Fax:2139783616
LAFD

CITY OF LOS ANGELES
CALIFORNIA

BOARD OF
FIRE COMMISSIONERS

JAY H. GRODIN
PRESIDENT
CORINA ALARCON
VICE PRESIDENT
ROLAND L. COLEMAN
LOUISE L. FRANKEL
TYRONE FREEMAN

PATRICIA A. ESCARBEGA
EXECUTIVE ASSISTANT II

JAMES K. HAHN
MAYOR

DEPARTMENT OF FIRE

200 NORTH MAIN STREET
LOS ANGELES, CA 90012

WILLIAM R. BAMATTRE
FIRE CHIEF
(213) 485-6004
FAX (213) 485-6247

http://www.lafd.org

SCANNED
SEP 0 9 2004

June 2, 2003

Mr. Morris Malekan
Ortek, General Partnership
1801 East 41st Place
Los Angeles, CA 90058

RE: [redacted] Los Angeles, California
[redacted] Los Angeles, California

Dear Mr. Malekan:

Per your request, the Fire Department has reviewed the information on the underground storage tanks that were removed from 4101 South Alameda Street. A "no further action" letter was drafted and issued for those tanks. Upon further review, the Fire Department has determined that the serial numbers of the (2) 10,000 gallon UST's that were installed at 1801 East 41st Place were identical to the UST's referenced at the 4101 South Alameda Street abandonment.

The "no further action" letter for 4101 South Alameda Street was drafted in error. A new letter has been drafted and is enclosed for your records. The Fire Department will include this letter in both files for future reference.

Thank you for bringing this situation to our attention. Please contact Captain Frank Comfort of the Environmental Unit, at (213) 485-7543 if you have any further questions or concern.

Very truly yours,

Frank Comfort

Frank Comfort, Captain I
Commander, Environmental Unit

FC:FC:amo:env4779

AN EQUAL EMPLOYMENT OPPORTUNITY - AFFIRMATIVE ACTION EMPLOYER

May 3 2006 11:12 P. 08
Fax:2139783616
LAFD

F-280

FIRE DEPARTMENT — CITY OF LOS ANGELES

APPLICATION FOR PERMIT

Reg. No. 23415

Date AUG 28 1973

Name of Owner	Doing Business As
UTILITY TRAILER SALES CO	TRAILER MFG.

Address of Owner	Owner's Phone
4073 So. ALAMEDA, LOS ANGELES, CA	233-3221

Address of Installation	Phone at Installation
1801 EAST 41ST PLACE	SAME

Mail Permit to

B. R. WIGGINS - CONTR 3729 EAST FLORENCE, BELL CA 90201

Signature of Applicant	Title	Contractor's Phone
B. R. Wiggins	Contractor	582-6267

Do Not Write Below This Line

NO.	ITEM	FEE
1	Install Atmospheric Tanks	15 00

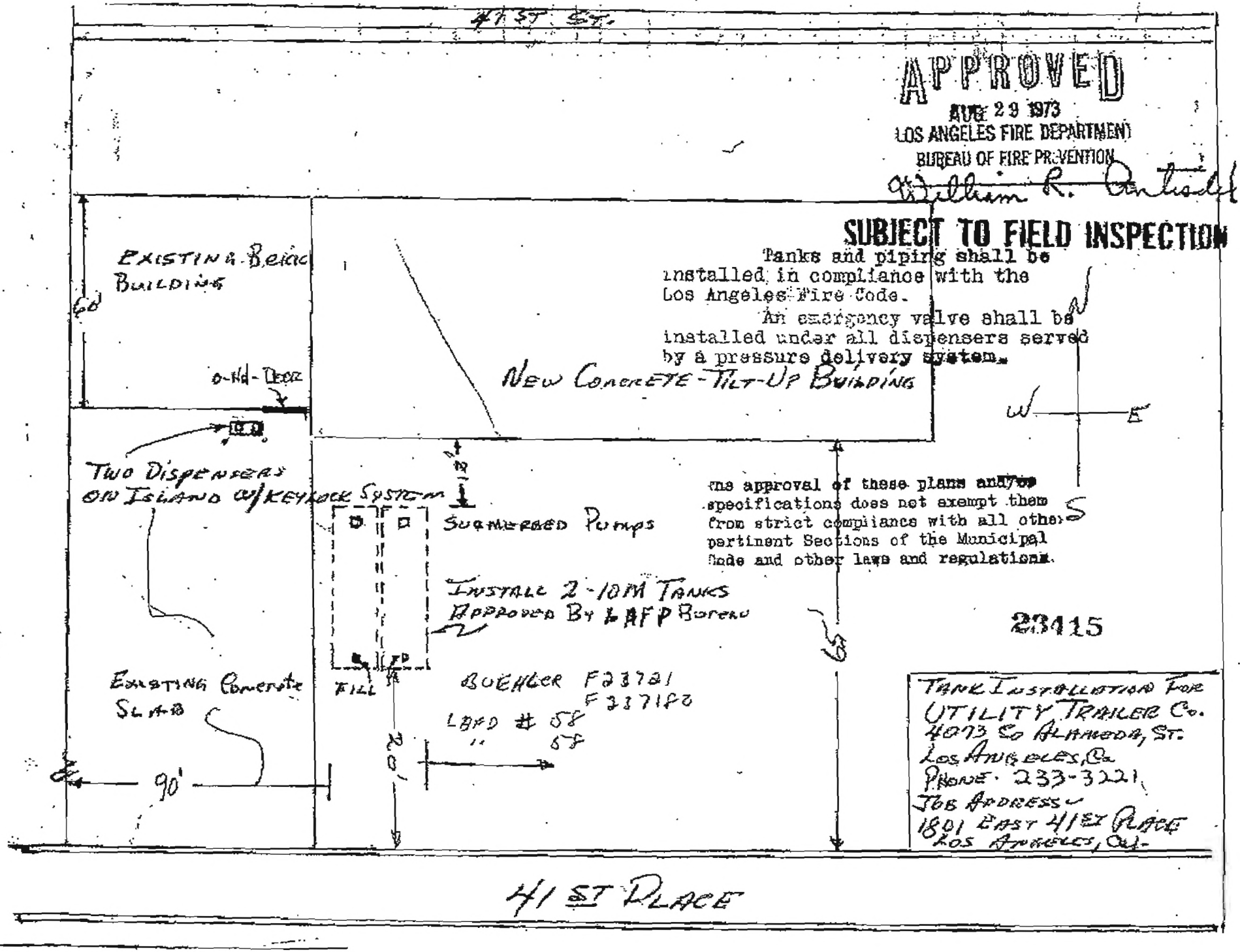
PERMIT GRANTED

AUG 28 1973

Total Fee	Approved	Disapproved	Date	Inspector
15 00	☑	☐	8-29-73	J. M. Norman

May 3 2006 11:12 P.09
Fax:2139783616
LAFD

May 3 2006 11:12 P.10
Fax:2139783616
LAFD



APPENDIX E
FIRE INSURANCE MAPS

EDR® Environmental
Data Resources Inc

"Linking Technology with Tradition"®

Sanborn® Map Report

Ship To: Dan Weis
Advantage Env.
810 Los Vallecitos Blvd
San Marcos, CA 92069

Order Date: 4/20/2006 **Completion Date:** 4/21/2006
Inquiry #: 1659051.3S
P.O. #: 06-016SD
Site Name: 1720 E 40th Place
Address: 1720 E 40th Place
City/State: Los Angeles, CA 90058
Cross Streets:

Customer Project: NA
4037585BAR 760-744-3363

Based on client-supplied information, fire insurance maps for the following years were identified

1920 - 2 Maps
1949 - 2 Maps
1953 - 2 Maps
1954 - 2 Maps
1958 - 2 Maps
1960 - 2 Maps
1963 - 2 Maps
1968 - 2 Maps
1970 - 2 Maps

Limited Permission to Photocopy Total Maps: 18

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This User's Guide provides guidelines for accessing Sanborn Map® images and for transferring them to your Word Processor.

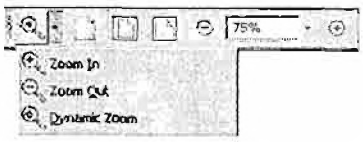
Reading Sanborn Maps

- Sanborn Maps document historical property use by displaying property information through words, abbreviations, and map symbols. The Sanborn Map Key provides information to help interpret the symbols and abbreviations used on Sanborn Maps. The Key is available from EDR's Web Site at: *http://www.edrnet.com/reports/samples/key.pdf*

Organization of Electronic Sanborn Image File

- Sanborn Map Report, listing years of coverage
- User's Guide
- Oldest Sanborn Map Image
- Most recent Sanborn Map Image

Navigating the Electronic Sanborn Image File

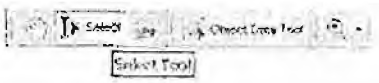


1. Open file on screen.
2. Identify TP (Target Property) on the most recent map.
3. Find TP on older printed images.
4. Using Acrobat® Reader®, zoom to 250% in order to view more clearly. (200-250% is the approximate equivalent scale of hardcopy Sanborn Maps.)
   A. On the menu bar, click "View" and then "Zoom to..."
   B. Or, use the magnifying tool and drag a box around the TP

Printing a Sanborn Map From the Electonic File

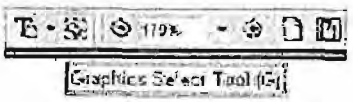
- EDR recommends printing images at 300 dpi (300 dpi prints faster than 600 dpi)
- To print only the TP area, cut and paste from Acrobat to your word processor application.

<u>Acrobat Versions 6 and 7</u>



1. Go to the menu bar
2. Click the "Select Tool"
3. Draw a box around the area selected
4. "Right click" on your mouse
5. Select "Copy Image to Clipboard"
6. Go to Word Processor such as Microsoft Word, paste and print.

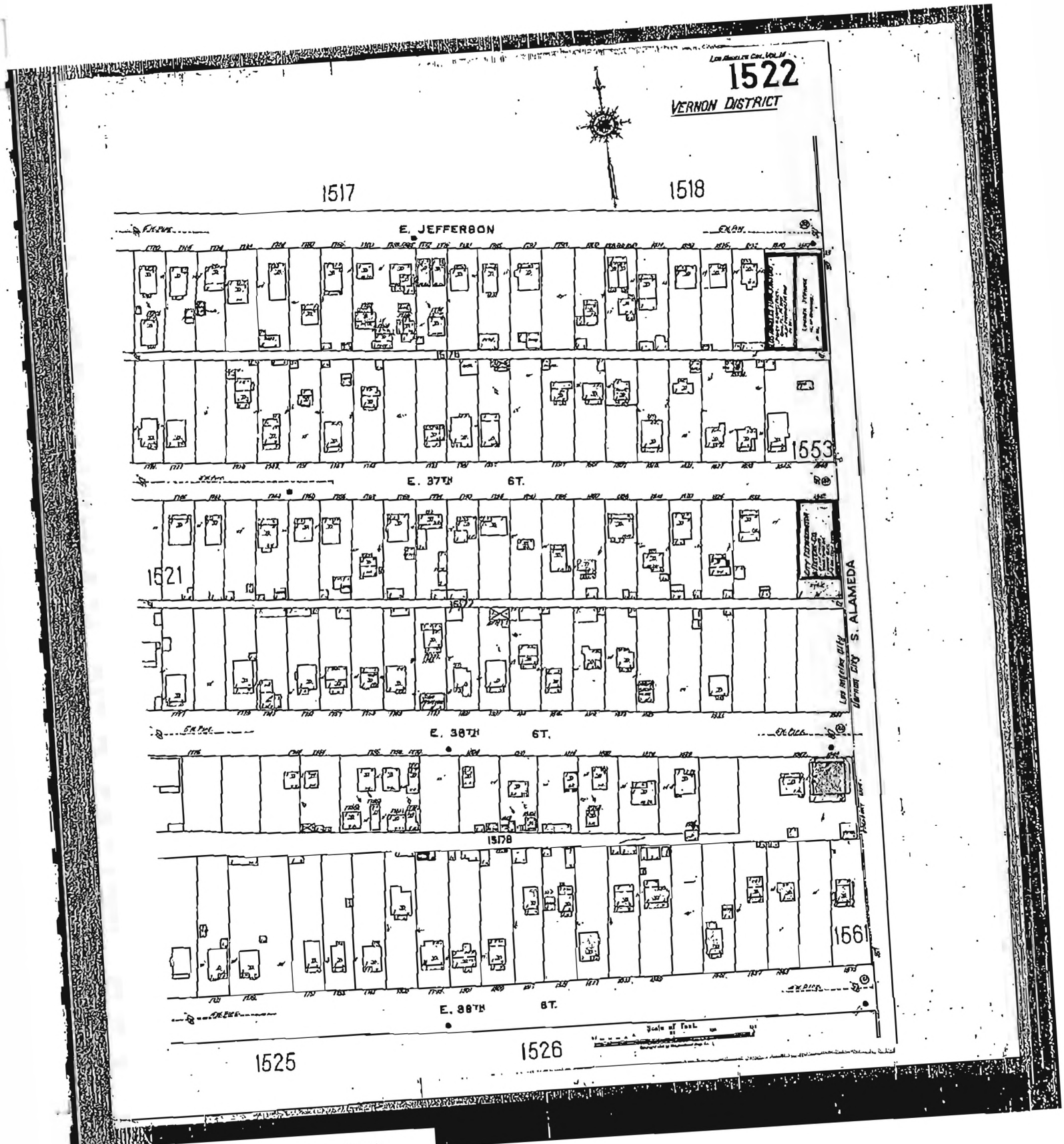
<u>Acrobat Version 5</u>



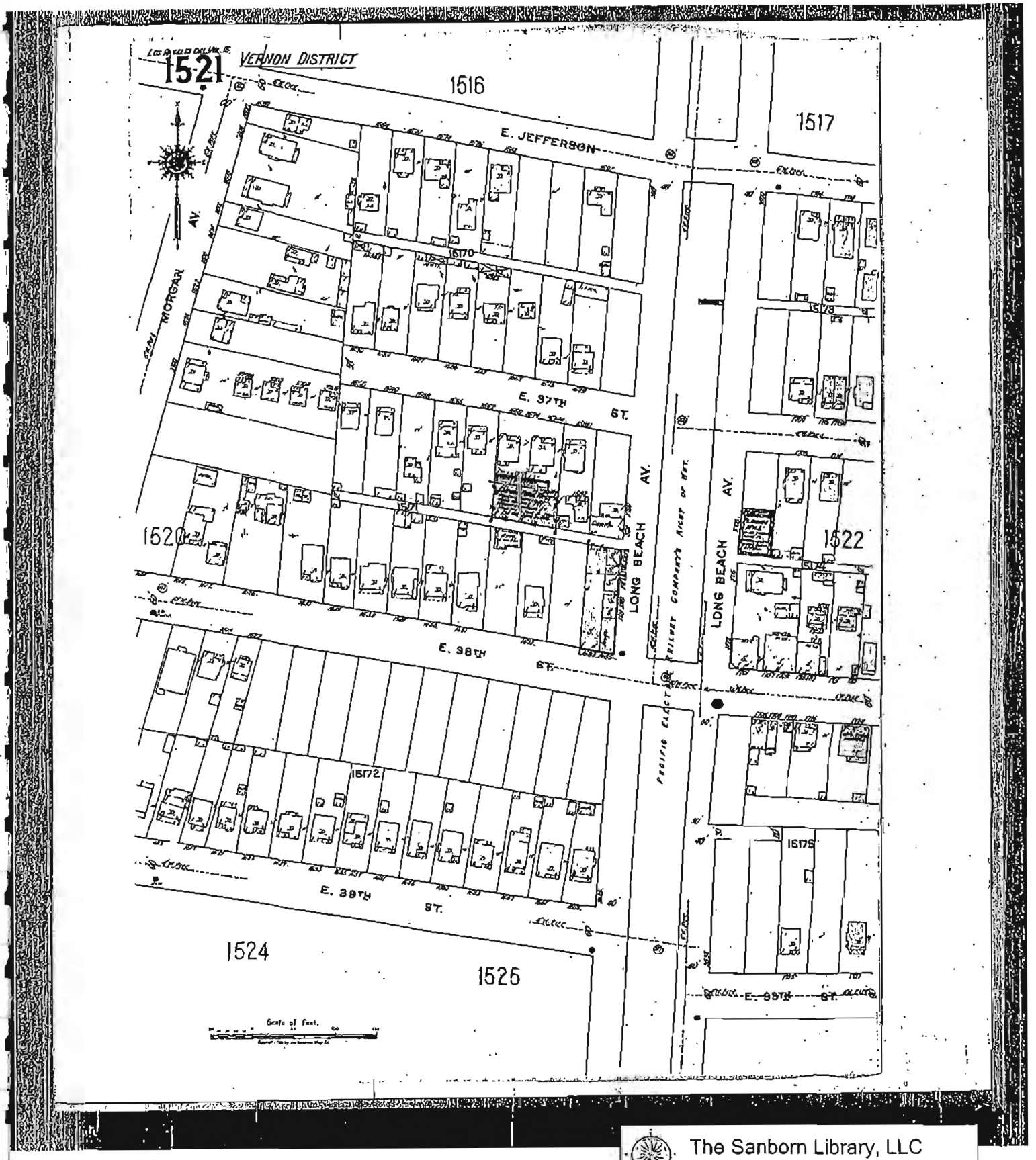
1. Go to the menu bar
2. Click the "Graphics Select Tool"
3. Draw a box around the area selected
4. Go to "Menu"
5. Highlight "Edit"
6. Highlight "Copy"
7. Go to Word Processor such as Microsoft Word, paste and print.

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- In cases where in excess of 6-7 map years are available, the file size typically exceeds 2MB. In these cases, you will receive multiple files, labeled as "1 of 3", "2 of 3", etc. including all available map years.
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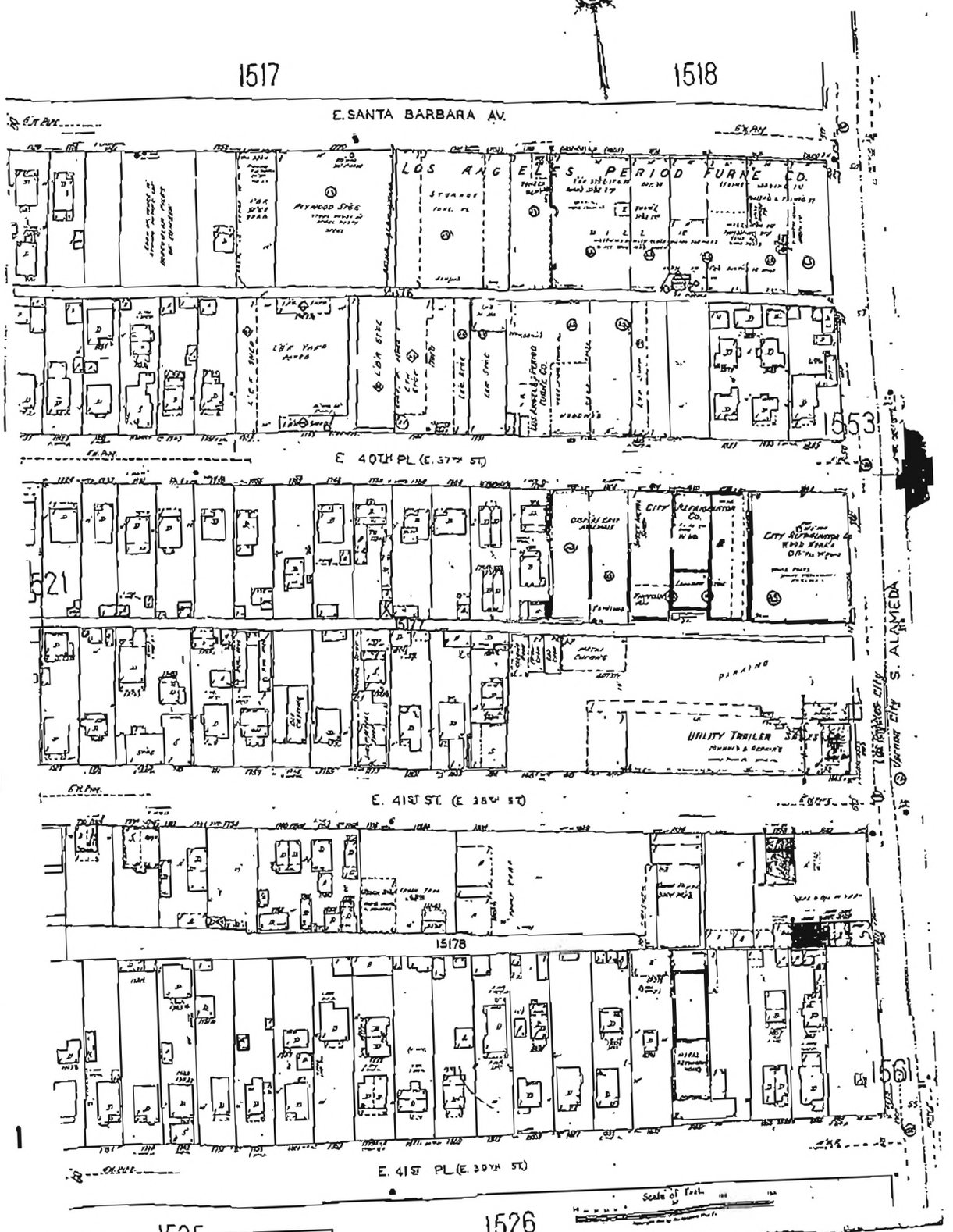
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VERNON DISTRICT

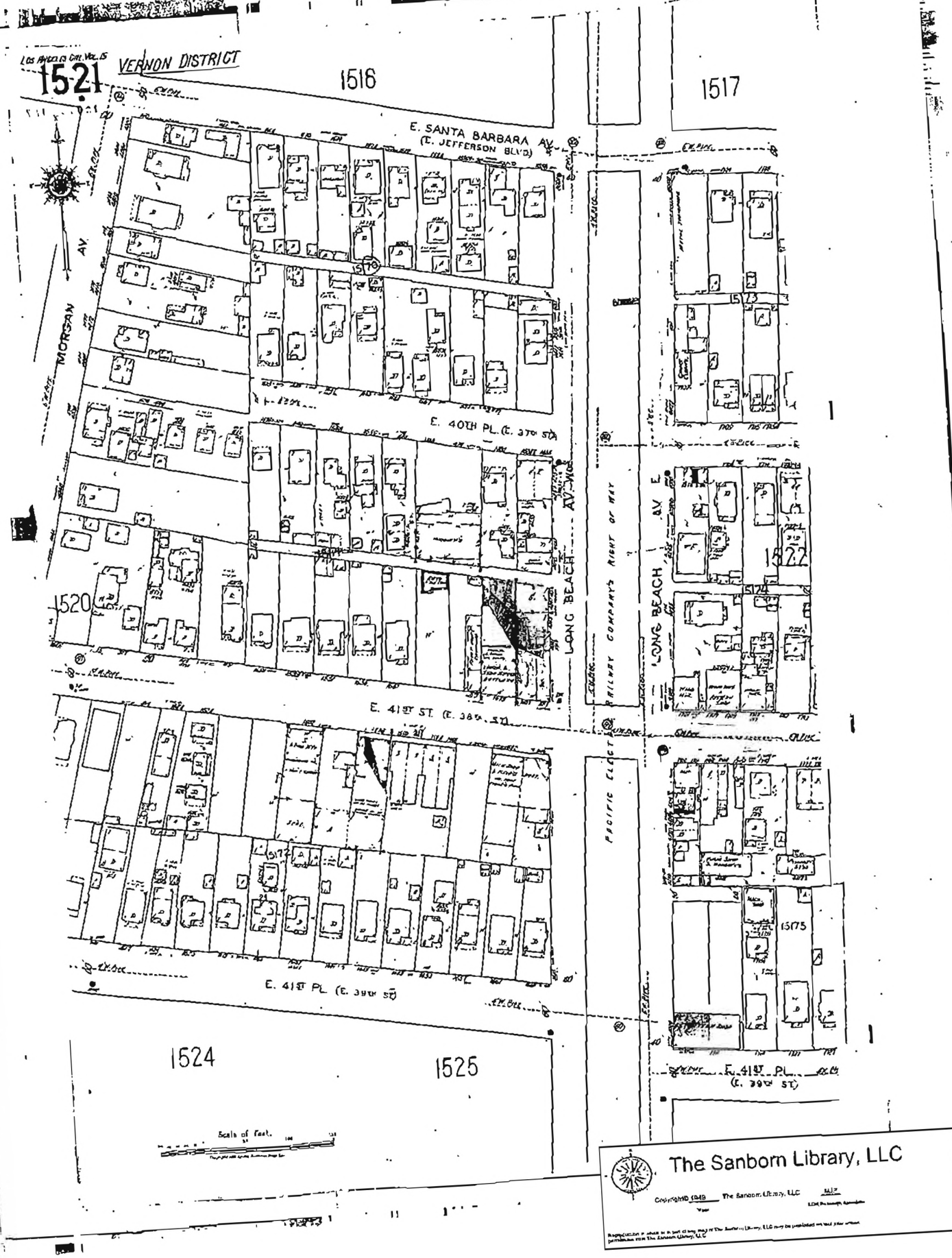


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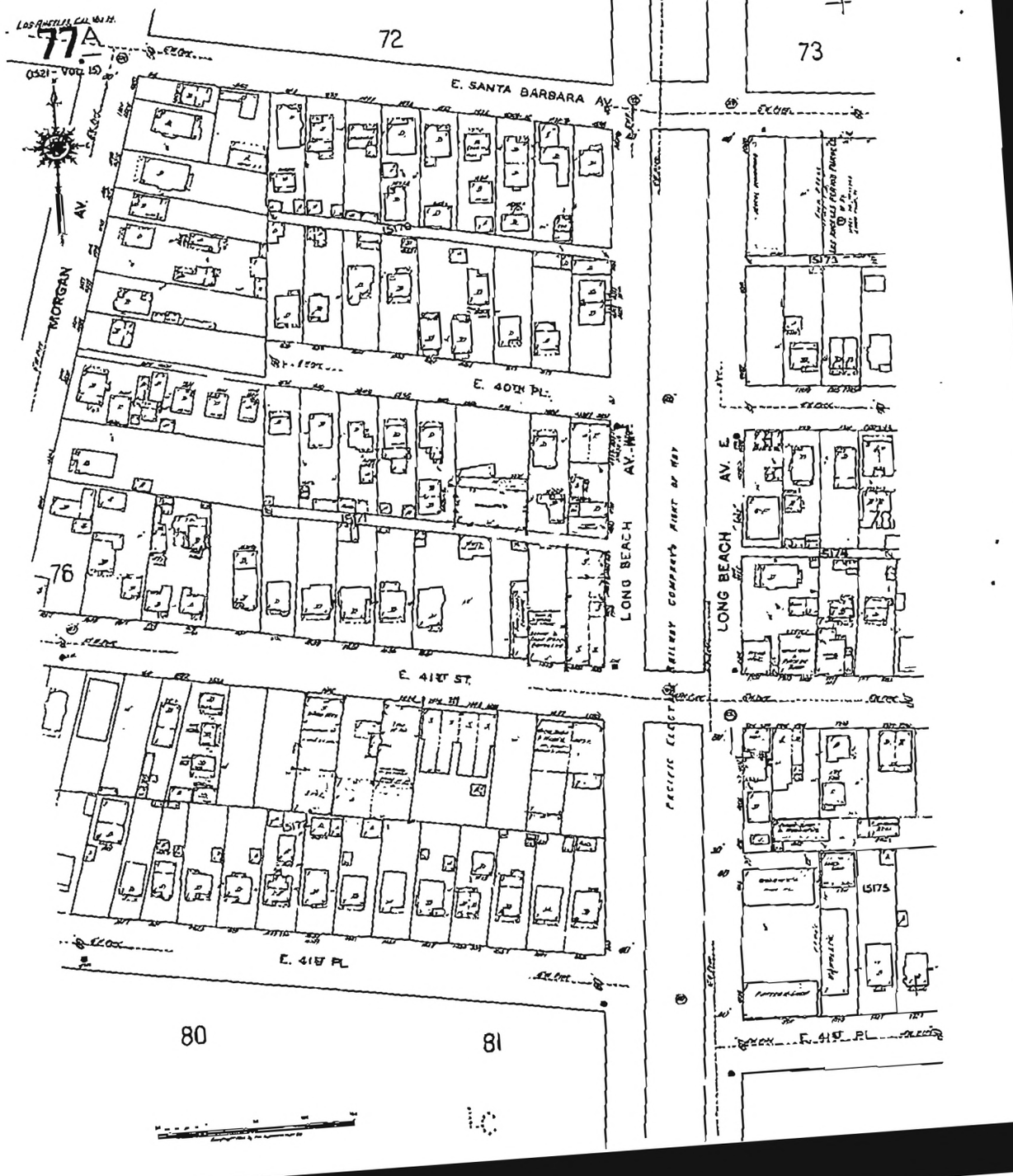
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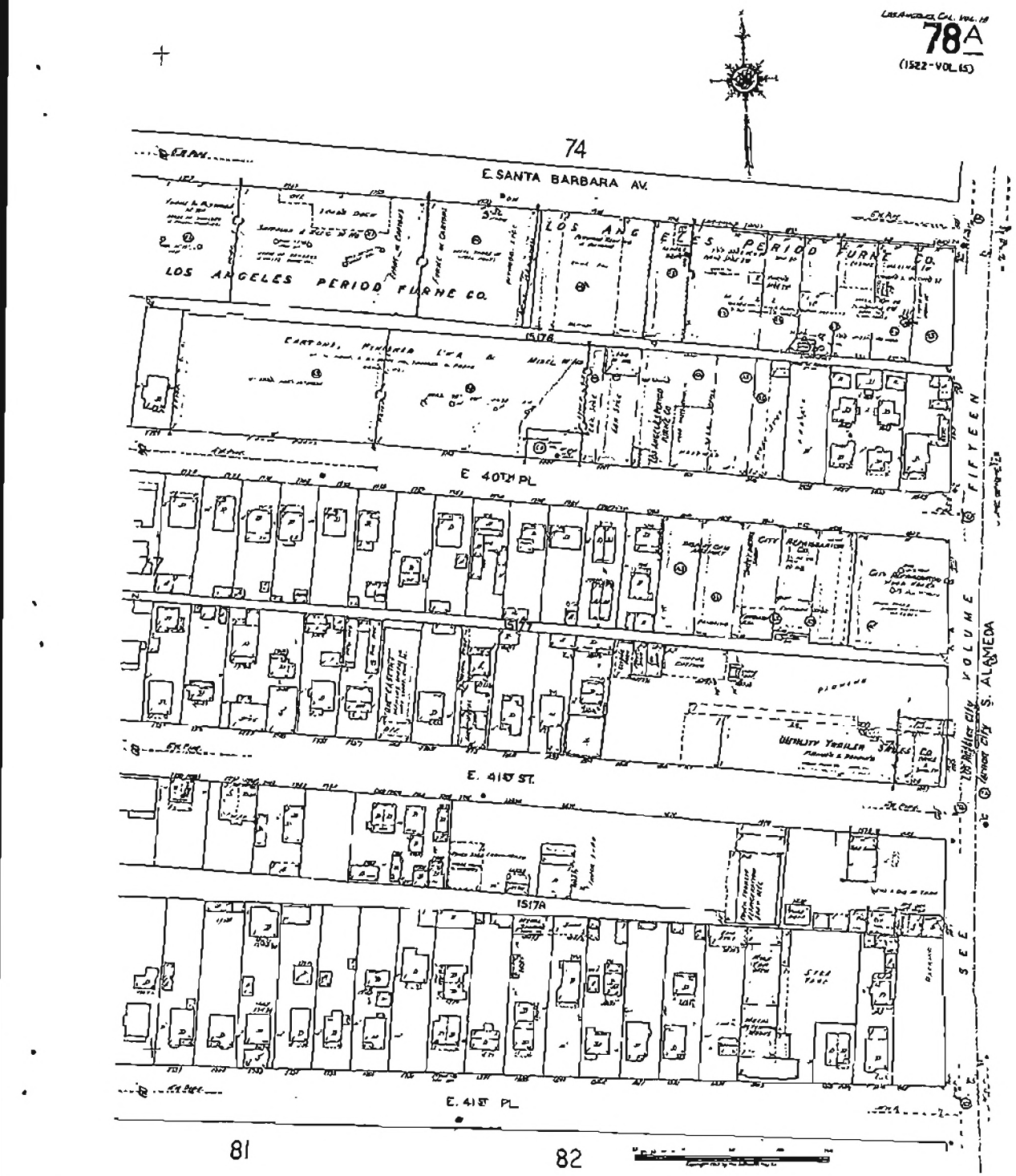


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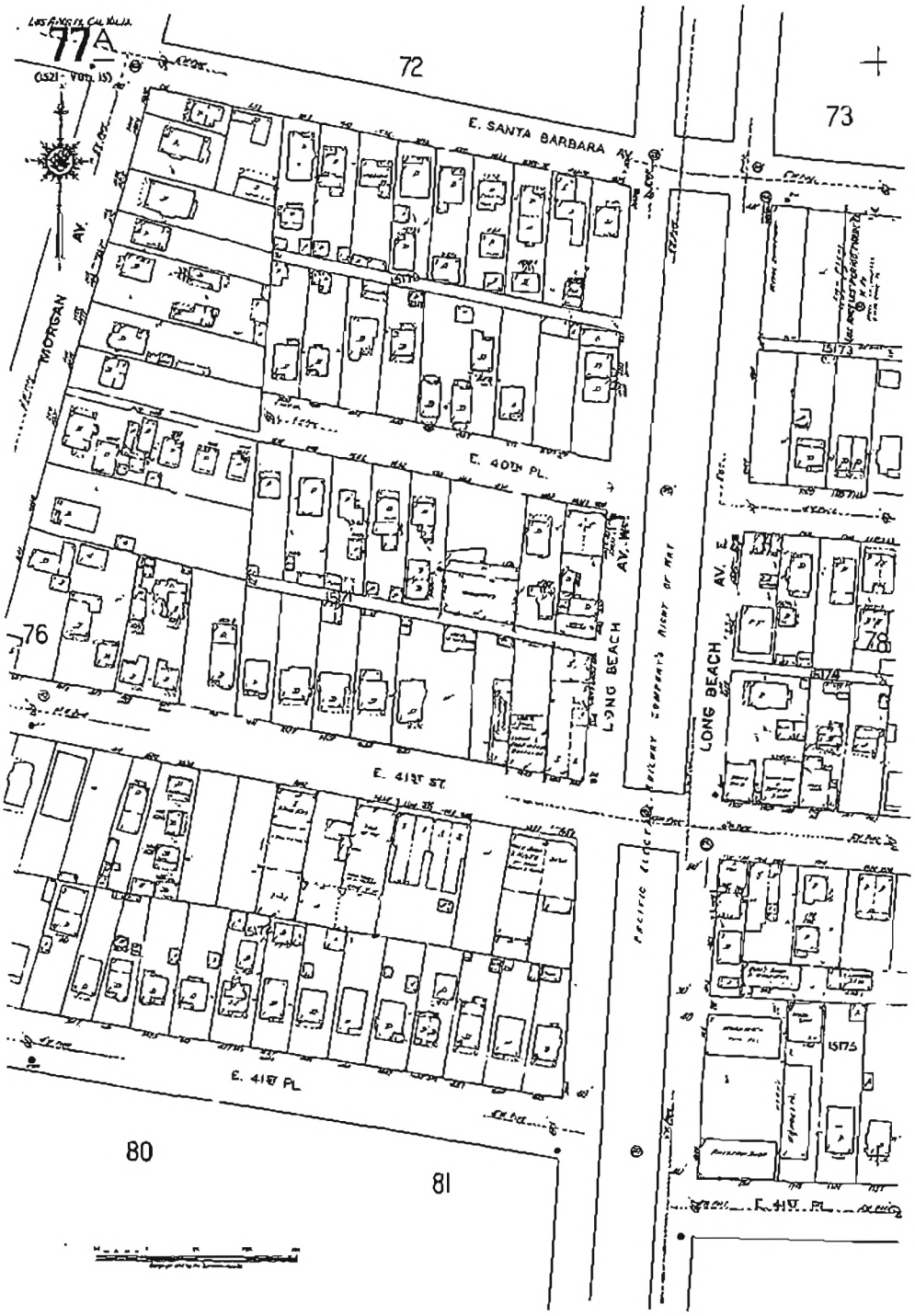
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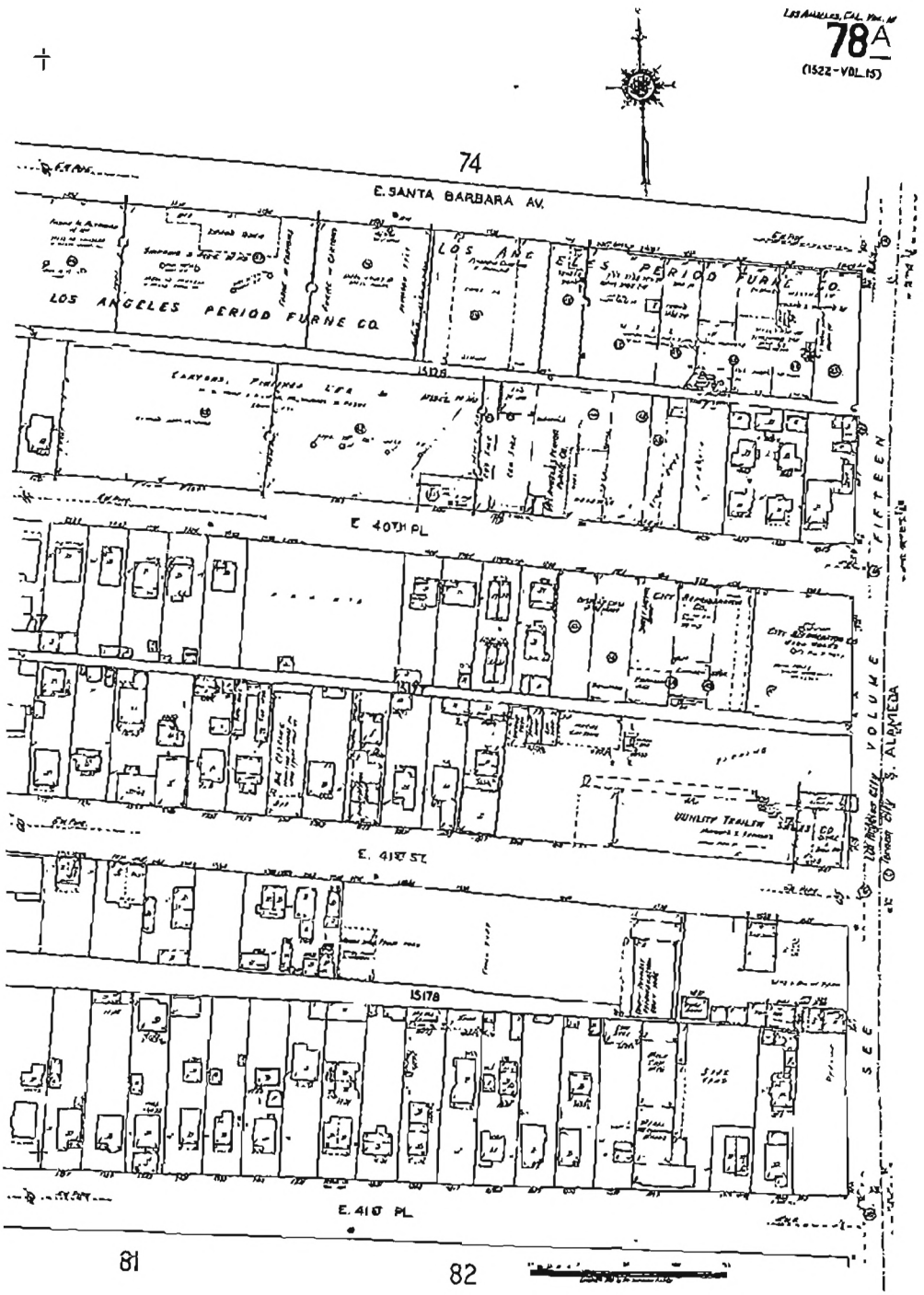
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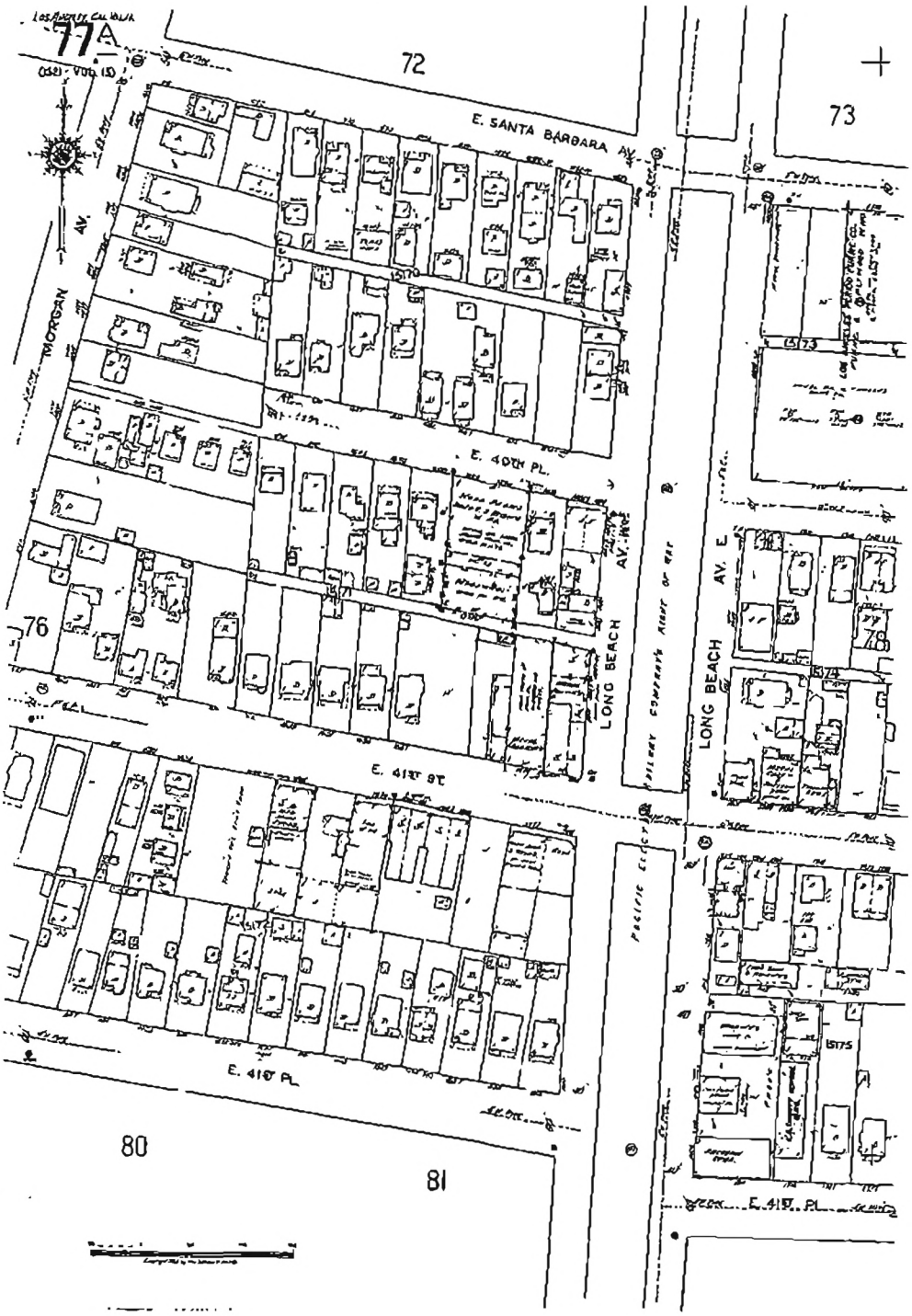
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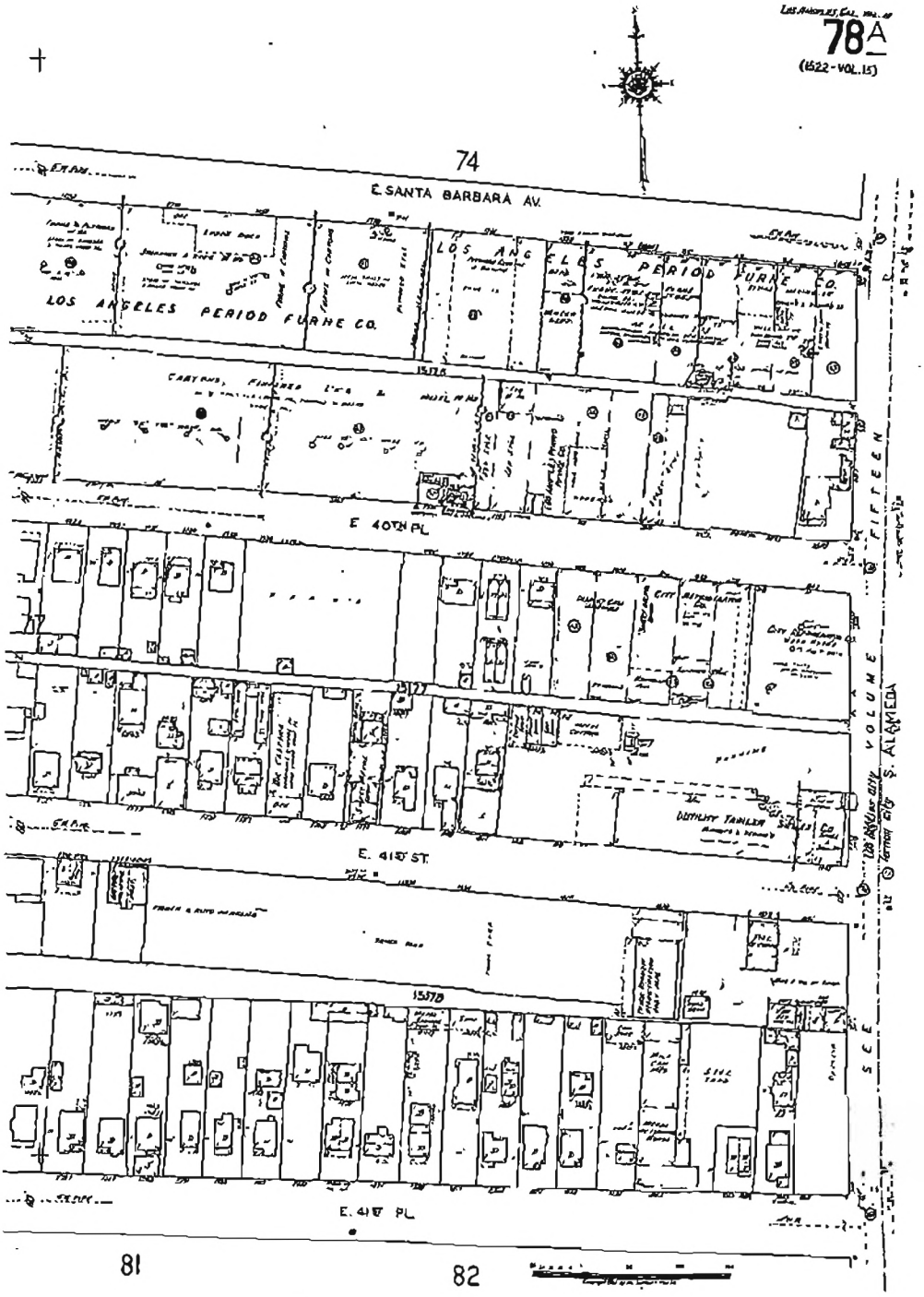
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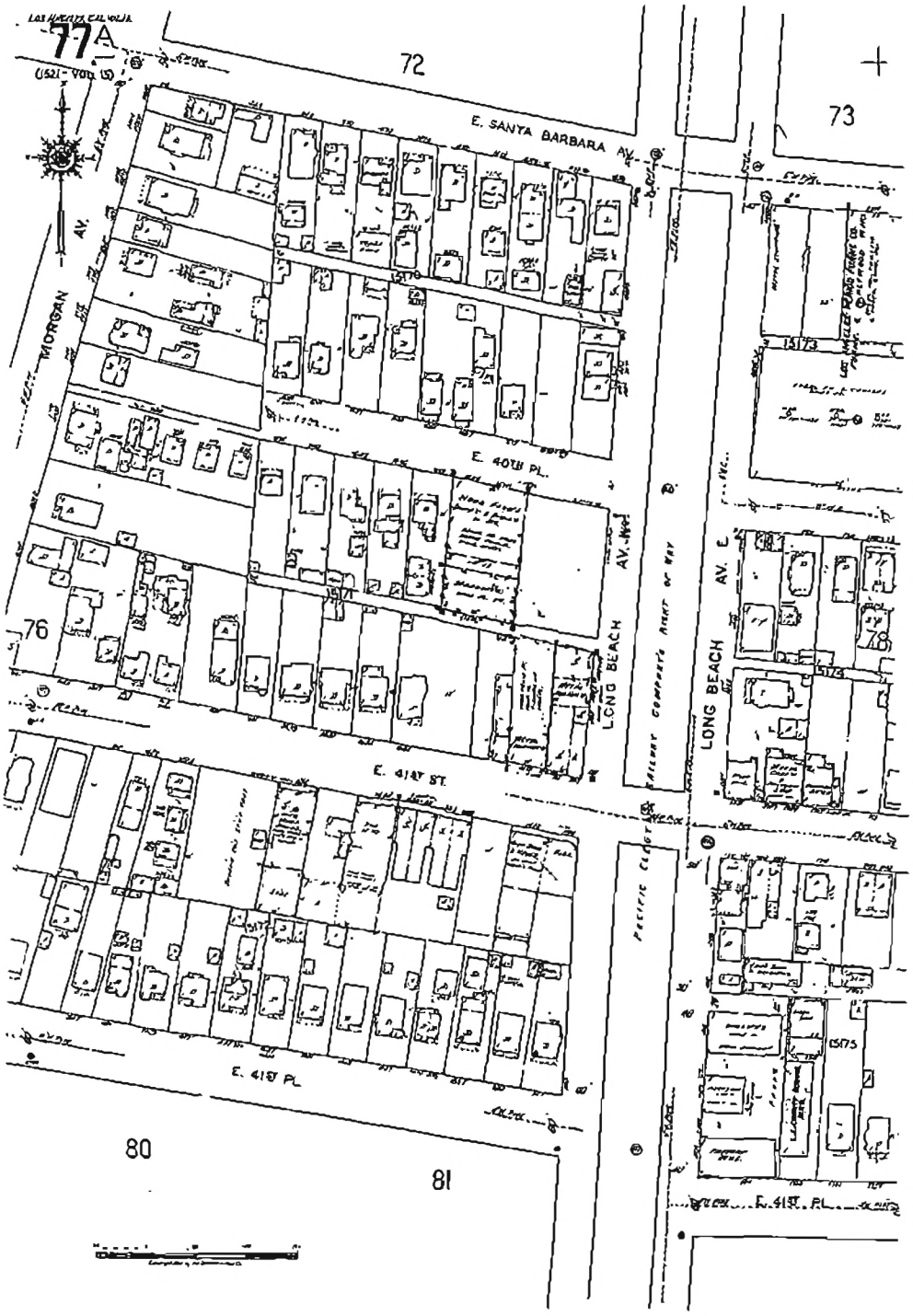
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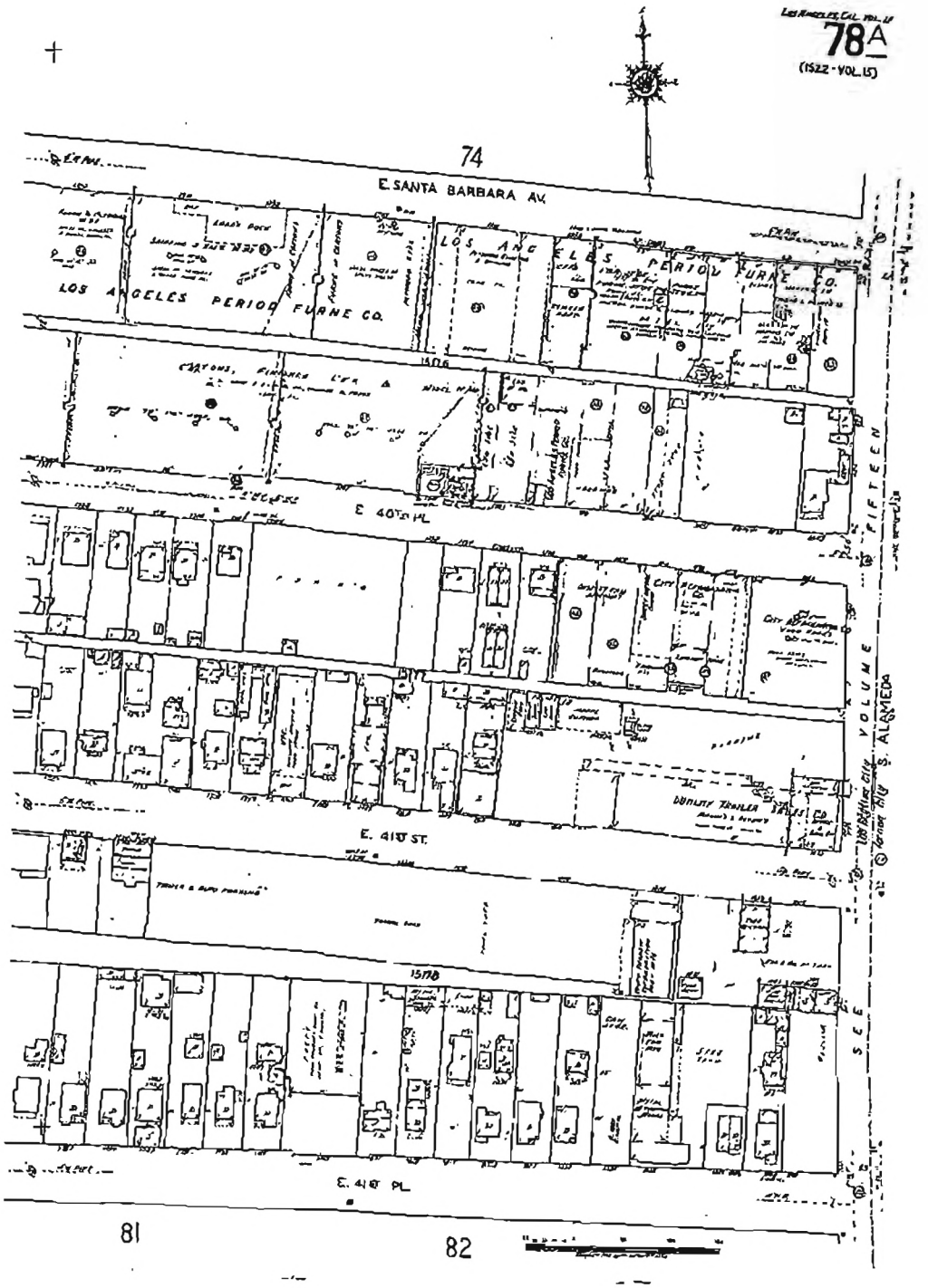
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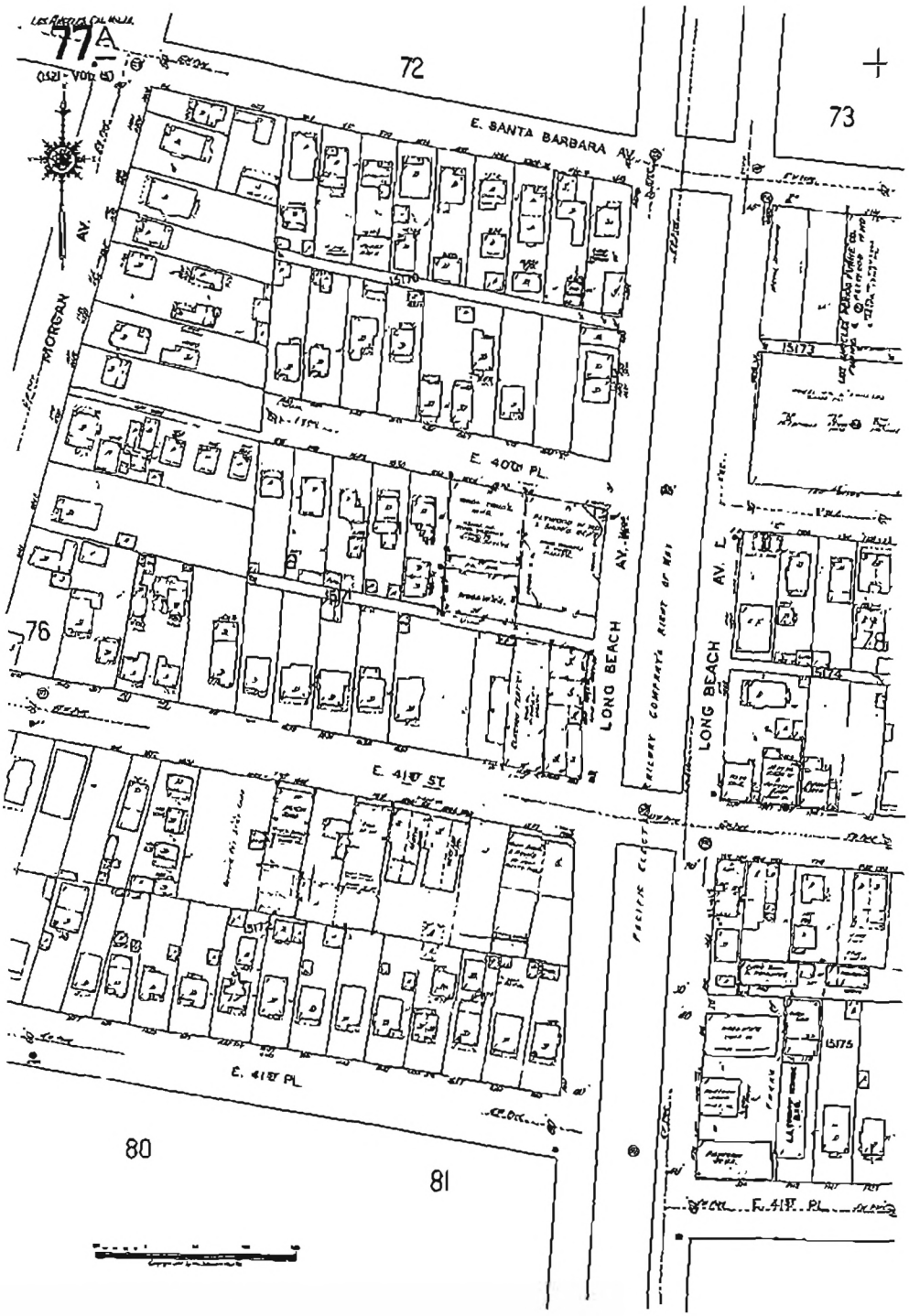
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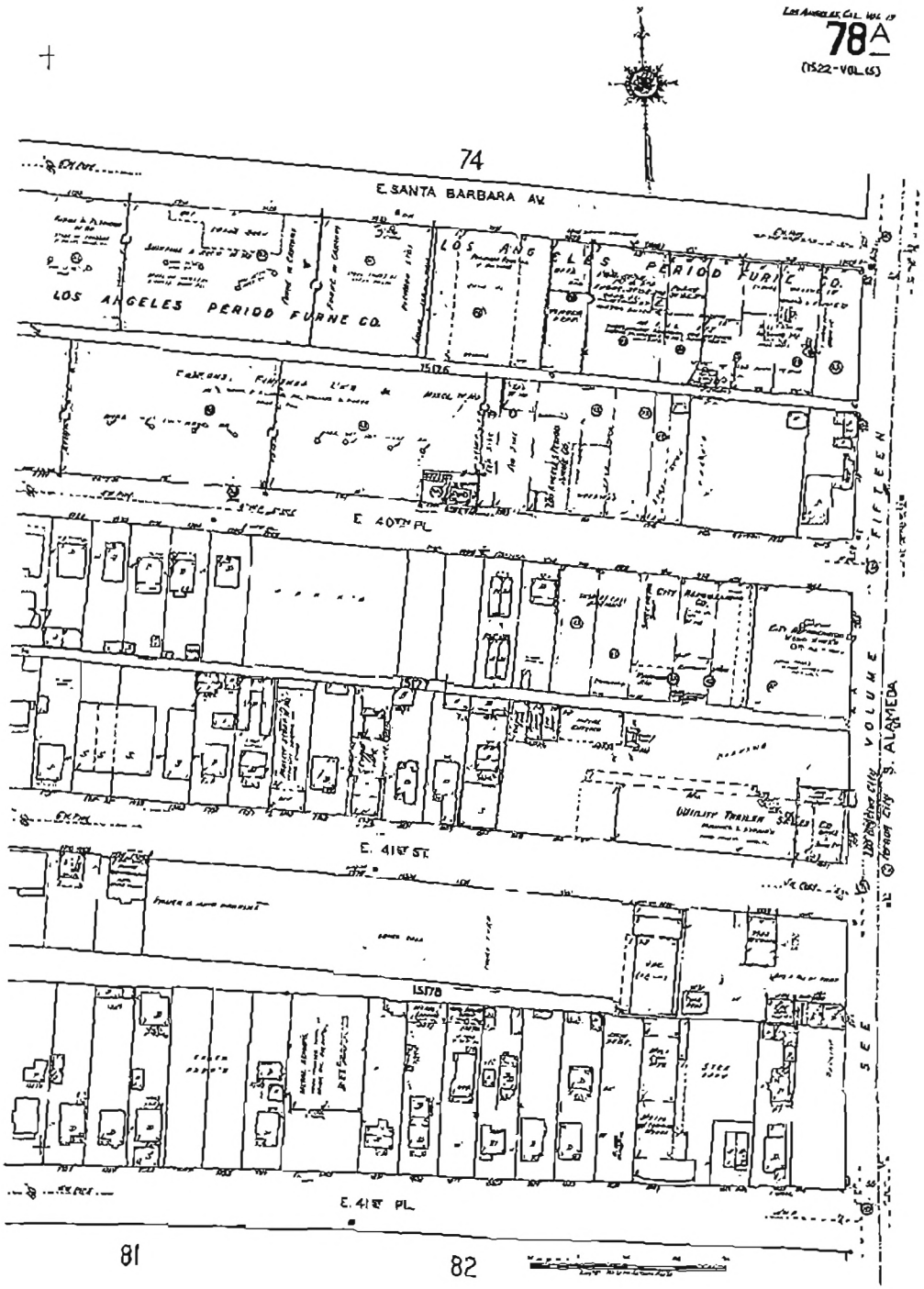
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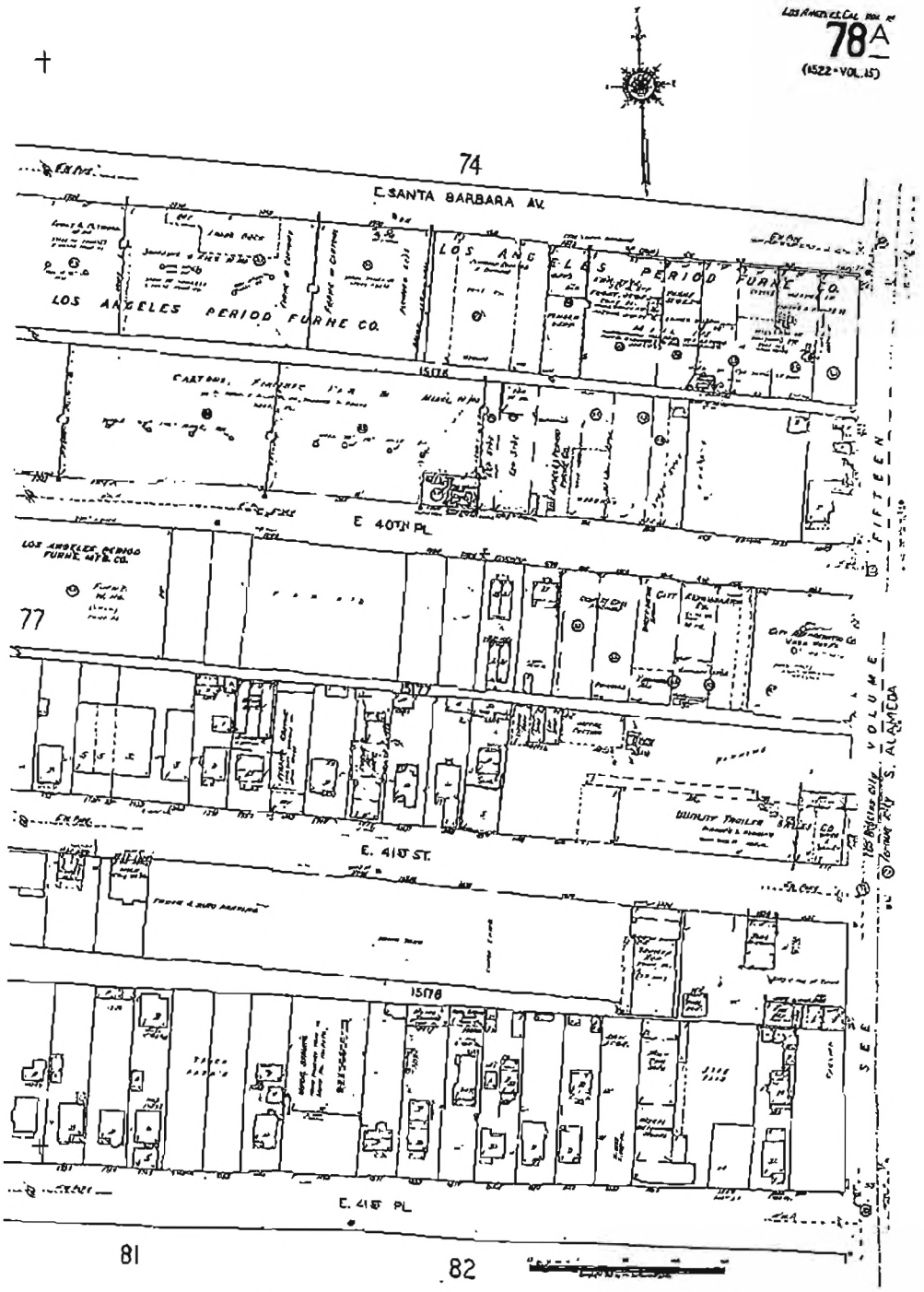
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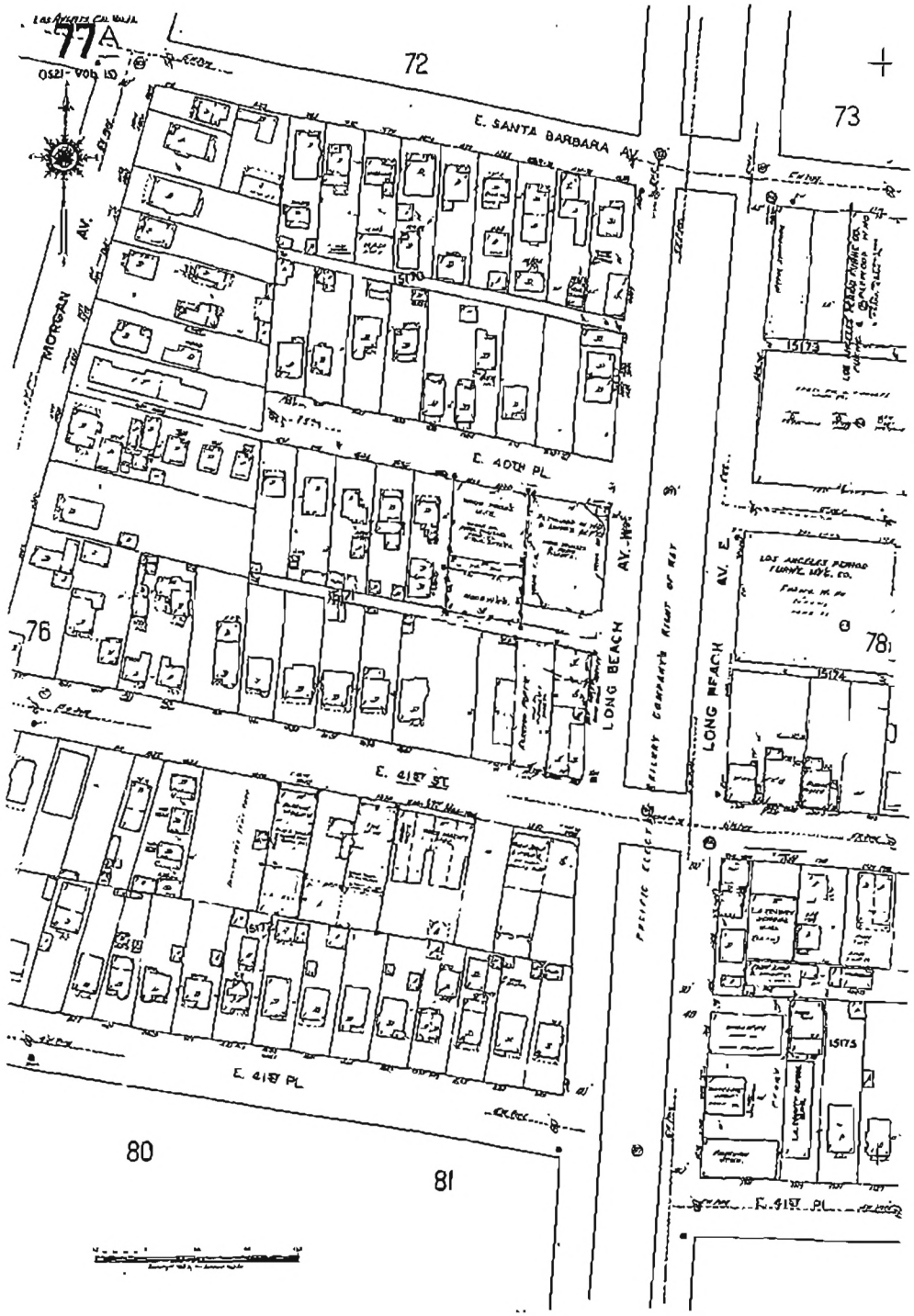
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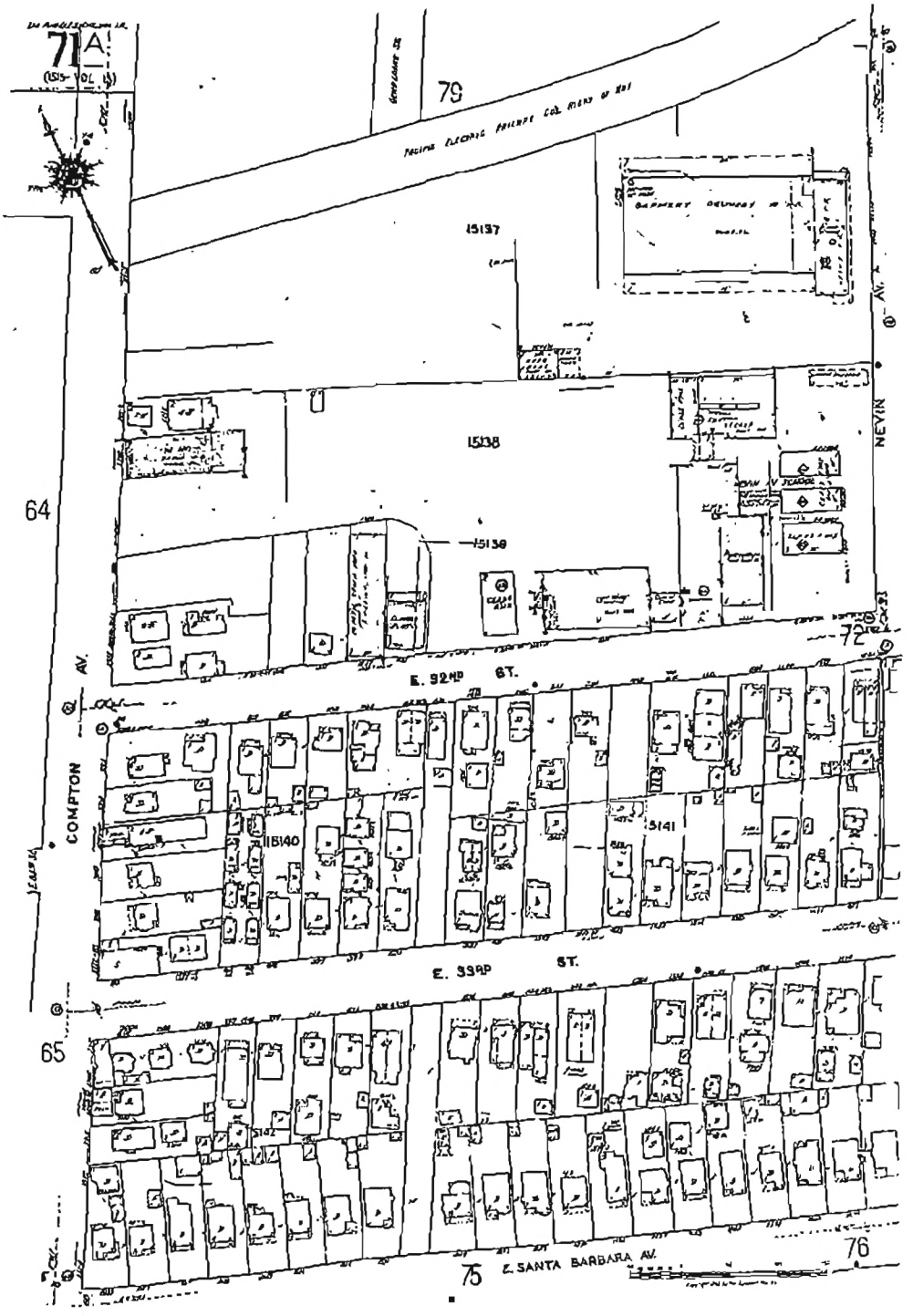
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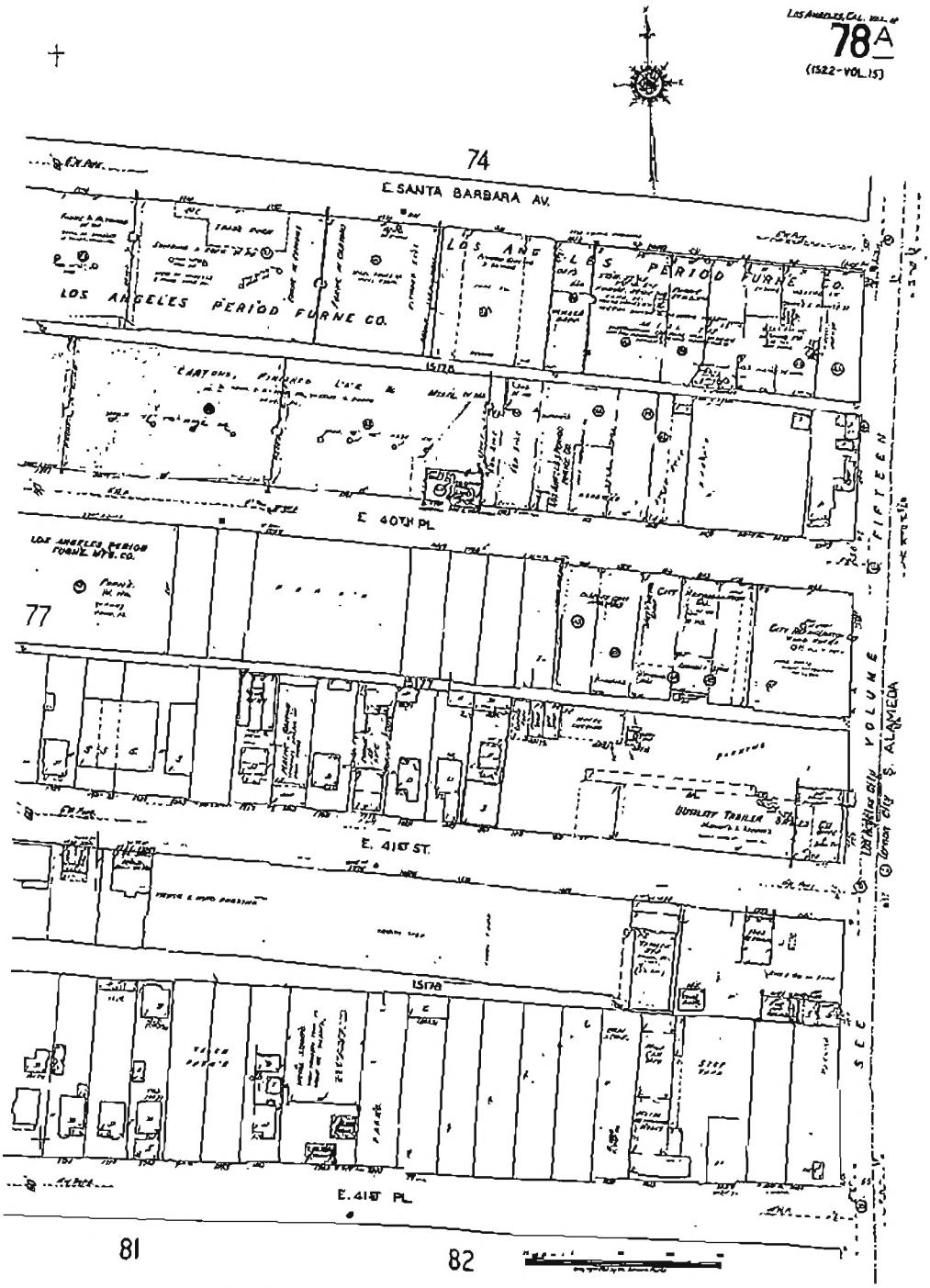


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APPENDIX F
CITY DIRECTORIES

The EDR-City Directory
Abstract

1720 E 40th Place
1720 E 40th Place
Los Angeles, CA 90058

Inquiry Number: 1659051.4

Thursday, April 20, 2006



EDR® Environmental
Data Resources Inc

The Standard in Environmental Risk Management Information

440 Wheelers Farms Road
Milford, Connecticut 06461

Nationwide Customer Service

Telephone: 1-800-352-0050
Fax: 1-800-231-6802
Internet: www.edrnet.com

EDR City Directory Abstract

Environmental Data Resources, Inc.'s (EDR) City Directory Abstract is a screening tool designed to assist environmental professionals in evaluating potential liability on a target property resulting from past activities. EDR's City Directory Abstract includes a search and abstract of available city directory data. For each address, the directory lists the name of the corresponding occupant at five year intervals.

Thank you for your business.
Please contact EDR at 1-800-352-0050
with any questions or comments.

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SUMMARY

- ***City Directories:***

Business directories including city, cross reference and telephone directories were reviewed, if available, at approximately five year intervals for the years spanning 1920 through 2004. (These years are not necessarily inclusive.) A summary of the information obtained is provided in the text of this report.

This report compiles information by geocoding the subject properties (that is, plotting the latitude and longitude for such subject properties and obtaining data concerning properties within 1/16th of a mile of the subject properties). There is no warranty or guarantee that geocoding will report or list all properties within the specified radius of the subject properties and any such warranty or guarantee is expressly disclaimed. Accordingly, some properties within the aforementioned radius and the information concerning those properties may not be referenced in this report.

Date EDR Searched Historical Sources: Apr 20, 2006

Target Property:
1720 E 40th Place
Los Angeles, CA 90058

Year	Uses	Source
1920	Address Not Listed in Research Source	Los Angeles Directory Co.
1921	Address Not Listed in Research Source	Los Angeles Directory Co.
1923	Address Not Listed in Research Source	Los Angeles Directory Co.
1924	Address Not Listed in Research Source	Los Angeles Directory Co.
1925	Address Not Listed in Research Source	Los Angeles Directory Co.
1926	Address Not Listed in Research Source	Los Angeles Directory Co.
1927	Address Not Listed in Research Source	Kaasen Directory Company Publishers
1928	Address Not Listed in Research Source	Los Angeles Directory Co.
1929	Address Not Listed in Research Source	Los Angeles Directory Co.
1930	Address Not Listed in Research Source	Los Angeles Directory Co.
1931	Address Not Listed in Research Source	Los Angeles Directory Company Publishers
1932	Address Not Listed in Research Source	Los Angeles Directory Co.
1933	Address Not Listed in Research Source	Los Angeles Directory Co.
1934	Address Not Listed in Research Source	Los Angeles Directory Co.
1935	Address Not Listed in Research Source	Los Angeles Directory Co.

Year	Uses	Source
1936	Address Not Listed in Research Source	Los Angeles Directory Co.
1937	Address Not Listed in Research Source	Los Angeles Directory Co.
1938	Address Not Listed in Research Source	Los Angeles Directory Company Publishers
1939	Address Not Listed in Research Source	Los Angeles Directory Co.
1940	Address Not Listed in Research Source	Los Angeles Directory Co.
1942	**E 40TH PL** ESTRADA ANTONIO GREGORIA WAITER (1720) LIMON EDDIE E LILLIAN LAB (1720) MENDOZA MARCELINA WID ROSENDO (1720) MORENO VERN P ANGALINA DRIVER (1720) RASO VIVIAN WID JOS (1720)	Los Angeles Directory Co.
1944	Address Not Listed in Research Source	R. L. Polk & Co.
1945	Address Not Listed in Research Source	R. L. Polk & Co.
1946	Address Not Listed in Research Source	Los Angeles Directory Co.
1947	Address Not Listed in Research Source	Pacific Directory Co.
1948	Address Not Listed in Research Source	Los Angeles Directory Co.
1949	Address Not Listed in Research Source	Los Angeles Directory Co.
1950	Address Not Listed in Research Source	Pacific Telephone
1951	**40TH PL E** E 40TH PL MALDONADO JOSE R (1720)	Los Angeles Directory Co Publishers
1952	Address Not Listed in Research Source	Los Angeles Directory Co.
1954	Address Not Listed in Research Source	R. L. Polk & Co.

Year	Uses	Source
1955	Address Not Listed in Research Source	R. L. Polk & Co.
1956	Address Not Listed in Research Source	Pacific Telephone
1957	Address Not Listed in Research Source	Pacific Telephone
1958	Address Not Listed in Research Source	Pacific Telephone
1960	Address Not Listed in Research Source	Pacific Telephone
1961	Address Not Listed in Research Source	Luskey Brothers & Co
1962	"E 40TH PL" BACA ERNESTINA (1720) BACA FULGENCIO (1720)	Pacific Telephone
1963	Address Not Listed in Research Source	Pacific Telephone
1964	Address Not Listed in Research Source	Pacific Telephone
1965	Address Not Listed in Research Source	GTE
1966	Address Not Listed in Research Source	Pacific Telephone
1967	Address Not Listed in Research Source	R. L. Polk & Co.
1969	Address Not Listed in Research Source	Pacific Telephone
1970	Address Not Listed in Research Source	R. L. POLK & CO.
1971	Address Not Listed in Research Source	B&G Publications
1972	Address Not Listed in Research Source	R. L. Polk & Co.
1975	Address Not Listed in Research Source	Pacific Telephone
1976	Address Not Listed in Research Source	R.L. Polk & co Publishers

Year	Uses	Source
1980	Address Not Listed in Research Source	Pacific Telephone
1981	Address Not Listed in Research Source	Pacific Telephone
1985	Address Not Listed in Research Source	Pacific Bell
1986	**E 40TH PL** RETCO (1720) SANCHEZ PALLET CO (1720) T & C PALLET (1720)	Pacific Bell
1990	Address Not Listed in Research Source	Pacific Bell
1991	Address Not Listed in Research Source	Pacific Bell
1995	Address Not Listed in Research Source	Pacific Bell Telephone
1996	Address Not Listed in Research Source	GTE
1999	Address Not Listed in Research Source	Haines Company
2000	Address Not Listed in Research Source	Pacific Bell Telephone
2001	Address Not Listed in Research Source	Haines & Company, Inc.
2003	Address Not Listed in Research Source	Haines & Company
2004	Address Not Listed in Research Source	Haines Company

Adjoining Properties

SURROUNDING

Multiple Addresses
Los Angeles, CA 90058

Year	Uses	Source
1920	Address Not Listed in Research Source	Los Angeles Directory Co.
1921	Address Not Listed in Research Source	Los Angeles Directory Co.

Year	Uses	Source
1923	Address Not Listed in Research Source	Los Angeles Directory Co.
1924	**E 41ST**	Los Angeles Directory Co.
	KELLER CHAS C WAITER H (1706)	
	WILMONT HARVEY E COND H (1707)	
	HAIDA SIMON BUTCHER H (1714)	
	BECK LE ROY ELECTR R (1717)	
	LISTAKER WALTER W AUTO OPR R (1717)	
	MENDENHALL MARSHALL D SIGN PAINTER H (1717)	
	DAHL MARY H (1720)	
	CLIFFORD CAMP R FOREMN CITY PARK DEPT H (1721)	
	CLAUSE GEO H (1724)	
	KRAUSE JOHN H (1724)	
	FOX WM J BOXMKR H (1727)	
	DEWEY ROY W COND R (1730)	
	JOHNSON GUSTAV T CARP H (1730)	
	JONES WM F MACH H (1731)	
	LONG BEACH AVE	Los Angeles Directory Co.
	GREIG AINDW BAKER H (3619)	
	GREIG ANDW BAKER H (3619)	
	BURNETT ROBT H (3621)	
	CARLSON GUS CABTMKR R (3709)	
	CARLSON WALTER CLK R (3709)	
	HENDRICKSON JOHN H CABTMKR R (3709)	
	ADAMS & DAVIRS CHAS Q ADAMS THOS W DAVIRS MFRS RADIO APPARAT (3715)	
	GRASSO LEO BARBER (3719)	
	MARTIN EDMOND A PLUMBER (3850)	
	HUNTER CARRIE MAID R (3915)	
	HUNTER SAML E JANITOR H (3915)	
	E 40TH	Los Angeles Directory Co.
	SABBATH SEML (1660)	
	DU BOSE CHAS H MOTRMN R (1662)	
	JACOBS HERMAN S CLK H (1712)	
1925	Address Not Listed in Research Source	Los Angeles Directory Co.

Year	Uses	Source
1926	Address Not Listed in Research Source	Los Angeles Directory Co.
1927	Address Not Listed in Research Source	Kaasen Directory Company Publishers
1928	Address Not Listed in Research Source	Los Angeles Directory Co.
1929	**E 41ST**	Los Angeles Directory Co.
	ANDERSON JAS SHOE SHINER (1706)	
	WILMOT HARVEY E MAYME COND PE H (1707)	
	BOYD EUG MAYME JAN (1714)	
	SPEIGHTS FRED ANNA MECH H (1717)	
	BOYD LEONARD JAN (1720)	
	BOYD LEONORA COOK (1720)	
	JAMES ARTH ADV SLSMN L A TIMES (1721)	
	ELOFSON ANDW ALMIDA LAB (1722)	
	PEERS MILDRED MRS (1722)	
	STRINGER VIRGINIA MACH OPR (1722)	
	KNIGHTEN WM LAB (1724)	
	MALONE WARD ETHEL ELEV OPR (1724)	
	SNEED JOHN EVANGELINE LAB H (1727)	
	WYMANN GEO H MINNIE PHYS (1727)	
	DEWEY CORA M WID C S (1730)	
	DEWEY ROY W COND (1730)	
	JOHNSON THEO G ELIZ CARP (1730)	
	HUDDLESTON LUVENIA WID CHAS (1731)	
	HUDSON BERNICE MRS (1731)	
	LONG BEACH AVE	Los Angeles Directory Co.
	GOMEZ MANUEL LAB (3621)	
	HAWKINS FRANK R LILLIAN PLANING MILL (3700)	
	GUERALLAS CRESCENTIA MRS (3709)	
	BARTLEY GEO BILLIARDS (3713)	
	MONTELIUS HELEN MRS (3716)	
	MONTELIUS LESLIE G LAB (3716)	
	CIMO CERO BARBER (3719)	
	GOSS RICHD J FRANCES A REAL EST (3722)	

Year	Uses	Source
1929	(continued)	
	STEINER IGNATIUS CARRIE RESTR (3810)	
	H (3810)	
	CAMACHO ANGEL DOLORES SHOE REPR (3816)	
	HUNTER SAML E CARRIE (3915)	
	ROGERS GEO PEARL R (3915)	
	WELCH EARL H LAB R (3915)	
	WELCH LULU B WID J H (3915)	
	WELCH VIOLET MACH OPR R (3915)	
	HUNTER CARRIE MAID (3951)	
	E 40TH	Los Angeles Directory Co.
	DANIELS HAROLD LAB (1660)	
	DANIELS MAX CLK (1660)	
1930	Address Not Listed in Research Source	Los Angeles Directory Co.
1931	Address Not Listed in Research Source	Los Angeles Directory Company Publishers
1932	Address Not Listed in Research Source	Los Angeles Directory Co.
1933	**E 41ST**	Los Angeles Directory Co.
	KEYLOR JAS ELIZ PORTER (1706)	
	TAYLOR J CAR CLNR (1706)	
	LIGHTFOOT MAMIE WID B (1714)	
	SCOTT WENDELL D DOLORES CARRIER PO (1717)	
	BRIDGES JOHN W LENORA LAB CITY EUG (1720)	
	CLIFFORD WARREN ZELMA PLSTR (1721)	
	CLIFFORD C R LILLIAN PNTR PARK DEPT (1721)	
	CLIFFORD HOMER C MARION CLIFFORD WATSON & KELTON (1721)	
	MARTIN JAS HILDRID LAB (1724)	
	ELLIS REUBHE MARY CHAUF (1727)	
	TUCKER JAS HETTIE PORTER (1727)	
	MALONE VARD CLK (1730)	
	MATHEWS B F OLIVEA MACH (1731)	
	MATHEWS WM CHAUF (1731)	
	LONG BEACH AVE	Los Angeles Directory Co.
	FABIG IDA M MRS (3619)	
	HAIR JAS B PEARL (3621)	

Year	Uses	Source
1933	(continued)	
	STEINER IGNATIUS BAKER (3810)	
	CAMACHO ANGEL SERNA SHOE REPR (3816)	
	HUNTER CARRIE MAID GEN HOSP (3915)	
	HUNTER SAML S CARRIE (3915)	
	RABER IRVIN H ELSIE PTRNMKR (3920)	
	JESSEE CHAS L MILDRED AUTO MECH (4012)	
	"E 40TH"	Los Angeles Directory Co.
	SABBATH SAML LILLIE GRO (1660)	
	SEANTOSEOY CLEMENT FRIEDA BAKER (1735)	
1934	Address Not Listed in Research Source	Los Angeles Directory Co.
1935	Address Not Listed in Research Source	Los Angeles Directory Co.
1936	Address Not Listed in Research Source	Los Angeles Directory Co.
1937	**"E 41ST"**	Los Angeles Directory Co.
	FISHER SHELLY LYDIA PNTR (1706)	
	OCHS CHAS B DRIVER (1707)	
	OCHS RUTH F MRS WAITER (1707)	
	BOYD MAMIE L (1714)	
	OLIVER ISRAEL EDNA (1714)	
	RHONE LILLIAN MRS (1714)	
	JOHNSON WM L LENORE CARRIER PO (1717)	
	BACON EDNA MRS (1720)	
	NYQUIST JOSEPHINE WID SAM (1720)	
	WALKER ELIZ MRS (1720)	
	LIGON R D CAR CLNR PULLMAN CO (1721)	
	TAYLOR JAS ELIZ LAB (1721)	
	TAYLOR JAS CAR CLNR PULLMAN CO (1721)	
	ELOFSON ALMIDA MRS (1722)	
	POWERS DAVID J CASTER (1722)	
	STRINGER VIRGINIA CLK (1722)	
	WEMPLE GEO E PNTR (1724)	
	ZAMORANO ERNEST L BUTCHER (1724)	
	ZAMORANO LILLIAN M (1724)	
	KING MARY H MRS (1727)	

Year	Uses	Source
1937	(continued)	
	SNEED JOHN A EVANGELINE WTCHMN (1727)	
	LA MOTHE JEROME JNSEPHINE JAN (1730)	
	JORDAN EFFIE MRS (1731)	
	LONG BEACH AVE	Los Angeles Directory Co.
	BARRIOS ALFONSO CLK (3621)	
	BARRIOS CARLOS CLK (3621)	
	BARRIOS MARY MRS (3621)	
	CORMAN ALBT ROSE CBTMKR (3700)	
	KNAPP WM J CORA GAS STA (3700)	
	HENDRICKSON JOHN H CBTMKR (3709)	
	SANTA CRUZ HELEN STEN S B W MAY (3716)	
	SANTA CRUZ MANUEL D ANDREA MACH OPR (3716)	
	INGRAM JAS L MEAT PRESERVATIVE (3717)	
	STEINER IGNATIUS BAKER (3810)	
	CAMACHO ANGEL SHOE REPR (3816)	
	SANDOVAL ALBT (3915)	
	MILLER JOHN LNDRY (3920)	
	RABER IRVIN H PTRNMKR (3920)	
	RAMOS HILARIO MARY (4003)	
	E 40TH	Los Angeles Directory Co.
	TRUNNELL OSCAR V MECH (1691)	
1938	Address Not Listed in Research Source	Los Angeles Directory Company Publishers
1939	Address Not Listed in Research Source	Los Angeles Directory Co.
1940	Address Not Listed in Research Source	Los Angeles Directory Co.
1942	**E 41ST**	Los Angeles Directory Co.
	VARNEY CHAS E MATTIE GRO (1707)	
	LUGO JOHN JOSEPHINE LAB (1710)	
	SIMPSON GEO B HAZEL RUBBERWKR (1717)	
	VELASCO REFUGIE WID TRINIDAD (1721)	
	BRADY MARY MRS (1722)	
	LUGO MARGURITE MRS (1722)	
	MOISA JOS MARGUERITE LAB (1724)	
	CASILLAS JOS MARY LAB (1727)	

Year	Uses	Source
1942 (continued)		
	GUERRA MIGUEL FRANCISCA LAB (1727)	
	BALDIS ANTONIO RESTR (1730)	
	BORRENTEZ MARTINA WID JESUS L (1731)	
	MARTINEZ CRESENCIO MERCED (1731)	
	LUGO LOUIS WTCHMN (1732)	
	LONG BEACH AVE E	Los Angeles Directory Co.
	METAL PRODUCTS ENGINEERINGH INC L H LUPPEN (4000)	
	LONG BEACH AVE	Los Angeles Directory Co.
	JESSEN BERNARD O SHTMTLWKS (4000)	
	POTTS ALBT E ETHEL RUG CLNR (4014)	
	JARRETT ERNEST F CLARA JAN (4017)	
	RUELAS LOSGINOS LUPE GSA STA (4050)	
	TATE PEARL MRS (4057)	
	WELCH JAS CLEO FNDYWKR (4057)	
	HENDRICKSON JOHN H AUGUSTA CBTMKR (4059)	
	SANTA MANUEL D ANDREA EMP SCG CO (4066)	
	E 40TH PL	Los Angeles Directory Co.
	JACKSON MARION C IDA AUTO WASHER (1661)	
	TAYLOR ROCHELLE (1662)	
	WILLIAMS RUTH MRS (1662)	
	DAVIS THOS JESSIE COACH CLNR (1667)	
	HODGE ALEX M CATH COACH CLNR (1667)	
	BEACHUM WM MINNIE LAB (1668)	
	VALENZUELA AQULLES LAB (1669)	
	VARNIAN WM S CLM PULLMAN CO (1673)	
	LIGHTSY ALBT J LOU (1674)	
	PALMER CHAS H JENNIE ACCT (1689)	
	MORALES ANTONIA MACH OPR (1700)	
	HENDERSON JACK W MILLMN (1708)	
	HENDERSON MAMIE A MRS (1708)	
	VILLA CASEY SALLY CBTMKR (1708)	
	LOPEZ MARGUERITA WID DOMINGO (1714)	
	HEARD ALBT E CORNELL LAB (1715)	
	MICHELSON ALEX ESTRER NATIONAL CITRUS & PRODUCE CO (1721)	
	MICHELSON MILTON NATIONAL CITRUS & PRODUCE CO (1721)	

Year	Uses	Source
1942	(continued)	
	MARCUS MARY MRS (1722)	
	LLORENTO JOHN G RUTH EMP A R BELL (1726)	
	BOWIE MARENA MRS MAID (1727)	
	ESPELETA RALPH NICO LAB (1731)	
	RIVERA JULIA WID AUG (1732)	
	SHEFFIELD HERBT H KATH DRIVER (1732)	
	APRATO MARIE M WID LOUIS (1733)	
	APRATO PETER SHOPMN PRYNE & CO (1733)	
	BORZONI DOLORES WID MANUEL (1738)	
	CORTEZ PEDRO C ANGELITA LAB (1738)	
	ANDRADE MARIA LNDRYWKR (1739)	
	TRINE RITE WID RAYMOND RESTRWKR (1739)	
	PAPRATO JOS FRANCES GRO (1741)	
	OVALLE FELIX HELEN LAB (1744)	
	OVALLE JOHN SHOPMN R PANZA & SONS (1744)	
	COWRAL LEOPOLD MAGDALENA MEATCTR (1745)	
	ARREDONDO JESSE PAULA LAB (1750)	
	BLANCO GILBERT JULIA LAB (1751)	
	RODRIGUEZ CONRAD SAVINA LAB (1756)	
	PETTERZ JOHN G RAFAELA STOVE REPR (1757)	
	SZLATKY ANDW VERA LAB (1762)	
	BARTOLOMEA DOMINIC CATH FNDRYWKR (1767)	
	BARTOLOMEA MARGT FLOORWN S H KRESS & CO (1767)	
	ROJAS EDW A LUPE LAB (1768)	
	BERMAN ROBT R GRETCHEN DRIVER (1774)	
	BAO ANDW R MECH (1774)	
	BERUMAN SIMON E DEPT FORMN CITY ENG (1774)	
	CASTRO AGOPITO MARTINA LAB (1774)	
	TRUJILLO CORNELIUS ROSE LAB (1780)	
	FARR WM D EVA STEELWKR (1781)	
	SHEFFIELD KATH MAID (1782)	
	KNAPP CORA I WID WM J (1786)	
	ALARCON MACK D CARMEN LAB (1787)	
	ALARCON ANGUSTIN ALTAGRACIA CRANE OPR (1787)	
	ALARCON MACK MACH OPR (1787)	
	"E 40TH"	Los Angeles Directory Co.

Year	Uses	Source
1942	(continued)	
	. CASEY VILLA CBTMKR (1708)	
	"40TH PL"	Los Angeles Directory Co.
	APRATO CATH D CLK (1733)	
1944	Address Not Listed In Research Source	R. L. Polk & Co.
1945	Address Not Listed In Research Source	R. L. Polk & Co.
1946	Address Not Listed in Research Source	Los Angeles Directory Co.
1947	Address Not Listed in Research Source	Pacific Directory Co.
1948	Address Not Listed in Research Source	Los Angeles Directory Co.
1949	Address Not Listed in Research Source	Los Angeles Directory Co.
1950	"LONG BEACH AVE E"	Pacific Telephone
	FLO & MARIE S BROILER RESTRNT (3430)	
	GUARDIAN FENCE CO SALES OFC (3550)	
	APPLE VALLEY RANCHOS RI EST (3591)	
	BASS & WESTLUND OIL (3591)	
	SOUTHLAND HEATING INC (3601)	
	FROSTY ISLAND ICE CRM (3602)	
	WINSLOW GEO R ICE CRM (3602)	
	SUNSET CO THE BARBECUE EQUIP (3626)	
	DALE FURW CO THE (3648)	
	KARNS J F MTRCYLS (3654)	
	VKC-MAR MOTEL (3716)	
	STOCKWELSL JOHN HR (3716)	
	ARTHUR JAS RAY (3726)	
	COOPER LEE (3726)	
	TERHUFEN L W (3732)	
	HODGES NURSERY (3737)	
	ARMSTRONG NURSERIES INC (3759)	
	BOYD FORREST M (3768)	
	HOWELL RICHARD A (3768)	
	BUCKLEY JOHN B R (3768)	

Year	Uses	Source
1950	(continued)	
	DOBBIE H C R (3768)	
	MAZE JAS E R (3768)	
	ROYALL SAM R R (3768)	
	CLAIR DONALD V (3810)	
	GEUSLOR RUSSBEL S (3810)	
	GEISLER D H (3810)	
	HUGHES JAS T (3810)	
	ALCORN W V R (3818)	
	CREST MOTEL (3826)	
	MARTIN C ROBT SILVERWARE (3826)	
	COOK HERBERT O R (3832)	
	MCCORD J E R (3833)	
	DUFFY DEAN A (3836)	
	MORRIS STANLEY F MD (3850)	
	NORMAN S P MD (3850)	
	ROSS-LOOS MEDICAL GROUP (3850)	
	SWARTZ REX F MD (3850)	
	DUFFY S TEXACO SERV (3860)	
	FIVE-POINT SUPER SERV GASLNE SERV (3860)	
	LAUGHTER MARVIN SERV (3901)	
	PARKS SERV STNS (3910)	
	GAVIN S DRUG STORE (3911)	
	KEN S DINNER BELL RESTRNT (3918)	
	LOS CERRITOS FLOWER SHOP (3923)	
	LOS CERRITOS MKT (3923)	
	LOS CERRITOS MKT (3923)	
	PAWSON R B FLORIST (3923)	
	LOS CERRITOS LIQUORS (3925)	
	EARLY JOHN W (3931)	
	JONES RICHARD D (3931)	
	CHIEF MOTEL (3932)	
	THOMSON PETER (3937)	
	LACKEY WM D DC (3941)	
	INNERST H L R (3948)	
	BAECKERM P MD (3949)	
	LATSHAW C W MD (3949)	

Year	Uses	Source
1950	(continued)	
	ROYCE BELLE RL EST (4014)	
	MALFETT H A R (4015)	
	JACKSON ROBT E (4024)	
	KUEHN EUGENE M R (4024)	
	KLINE BROS LIQUOR MART (4030)	
	CARNTON MOTEL (4034)	
	VOSPER S C R (4040)	
1951	**41ST ST E**	Los Angeles Directory Co Publishers
	E 41ST EASTSIDE PATTERN & FOUNDRY CO (1707)	
	E 41ST RICHARD ROY LEE (1708)	
	E 41ST ALLEN WOOD PRODUCTS (1715)	
	E 41ST HIGHT FLORENCE R (1722)	
	E 41ST SMITH LEANA R (1724)	
	E 41ST CASILLAS MARY R (1727)	
	E 41ST GUERRA ALICE R (1727)	
	E 41ST CHILE KING CAFE (1730)	
	E 41ST LUGO JOSEPHINE BKRY (1730)	
	E 41ST MOLINA MARIO JR (1731)	
	LONG BEACH AV E	Los Angeles Directory Co Publishers
	LONG BCH AV EAST DONNELL FRANKLIN H METAL PRODUCTS ENGNRNG I (4000)	
	LONG BCH AV EAST METAL PRODUCTS ENGNRNG INC (4000)	
	LONG BCH AV EAST JONES WILL E R (4050)	
	BRADFORD OLA R (4060)	
	CHAMBLEE JOE R (4060)	
	LONG BCH AV EAST (4060)	
	LONG BCH AV EAST SANTA CRUZ JOE H R (4066)	
	LONG BEACH AV E W	Los Angeles Directory Co Publishers
	LONG BCH AV WEST PERCELL WM R (4015)	
	LONG BCH AV JACKSON ADELL R (4017)	
	LONG BCH AV WEST (4017)	
	WATKINS PARALEE R (4017)	
	LONG BCH AV WEST ROYAL TENCIE R (4057)	
	LONG BCH AV WEST FRIENDLY POULTRY MKT SEE MICKELBURY BROS PO (4065)	
	LONG BCH AV WEST MICKELBURY BROS POULTRY MKT (4065)	

Year	Uses	Source
1951 (continued)	LONG BCH AV WEST STAR ARMATURE CO (4069)	
	40TH PL E	Los Angeles Directory Co Publishers
	E 40TH PL JONES CRAWFORD R (1661)	
	E 40TH PL DAVIS CHAS A R (1662)	
	E 40TH PL ROLFE RUTH R (1662)	
	E 40TH PL SHEETS PETE R (1662)	
	E 40TH PL DAVIS TOM R (1667)	
	E 40TH PL HOLLYWD PRODUCTS CO COSMETCS (1668)	
	E 40TH PL WOOD PRODUCTS CO (1668)	
	E 40TH PL VARNUM EXSELSA MRS R (1673)	
	E 40TH PL PRATT CHAS R (1680)	
	E 40TH PL DOUGLAS WILLIE R (1682)	
	E 40TH PL HURREL CHAS R (1686)	
	E 40TH PL SANCHEZ HIPOLITO R (1708)	
	E 40TH PL ALLEN NORA R (1709)	
	E 40TH PL (1715)	
	VALENCIA PAULA M R (1715)	
	E 40TH PL MICHELSON ALEXANDER R (1721)	
	E 40TH PL KING YANCY R (1726)	
	E 40TH PL BISHOP ROBT R (1732)	
	E 40TH PL OVALLE FELIX R (1744)	
	E 40TH PL DIAZ REFUGIO R (1750)	
	E 40TH PL ROJAS MARY R (1768)	
	E 40TH PL SALAZAR IRENE MRS R (1772)	
	E 40TH PL BERUMAN EDW S R (1774)	
	E 40TH PL MENDOZA ROBT B R (1774)	
	E 40TH PL TRUJILLO C C R (1780)	
	E 40TH PL KNAPP W J R (1786)	
1952	Address Not Listed in Research Source	Los Angeles Directory Co.
1954	**LONG BEACH AVE E**	R. L. Polk & Co.
	FLO S BROILER RESTRNT (3430)	
	GUARDIAN FENCE CO (3550)	
	APPLE VALLEY NURSERY SCHOOL (3590)	
	CROSS RODMAN IC GEOLST (3591)	
	DUNLAP D D OIL CO (3591)	

Year	Uses	Source
1954	(continued)	
	ADVANCED ENGNRNG & SUPPLY CORP (3601)	
	PAYNE FURNACES (3601)	
	SOUTHLAND HEATING INC (3601)	
	CANNON JOS T RL EST (3602)	
	CANNON RITY (3602)	
	SCHLUMBERGER WELL SURVEYING CORP (3611)	
	HADLEY S FURN CO SOUTH GATE (3615)	
	GOODRICH PUMPING SERV OIL WELL SERV (3624)	
	SUNSET FENCE & PATIO CO (3626)	
	GOLDEN STATE CHINCHILLA FARMS & SALES CO (3648)	
	KARNS J F MTRCYLS (3654)	
	RAINBOW AUTO LAUNDRY AUTO SVC (3700)	
	RAINBOW AUTO LAUNDRY AUTO SVC (3700)	
	VIC-MAR MOTEL (3716)	
	JUNE WM A (3726)	
	LINEBERRY SAM (3726)	
	GRAHAM JOS A (3732)	
	PHILLIPS DONALD W (3732)	
	PISTOLE LEWIS (3732)	
	LUAN S LITTLE WOMEN DRESSES (3734)	
	HODGES L B NURSERY (3737)	
	LODGES NURSERY (3737)	
	AMERICAN STONE CO (3750)	
	BUSS ELEANOR M ACCTNT (3752)	
	MARSHALL & MURPHY CPA S (3752)	
	MARSHALL WALTER R ACCTNT (3752)	
	MURPHY JOHN P ACCTNT (3752)	
	MANCO CONST CO (3754)	
	NISHKIAN MLARTIN A ENGNR * (3754)	
	HOLMQUIST MORRIS RL EST (3756)	
	HOLMQUIST MORRIS RL EST (3756)	
	RICHEY FRANK H MORTGS (3758)	
	WESTRN MORTGAGE CORP (3758)	
	ARMSTRONG NURSERIES INC (3759)	
	BISHOPP E F (3768)	
	PEACOCK MARY C (3768)	

Year	Uses	Source
1954 (continued)		
	SKINNER ELMER (3768)	
	TAYLOR ALTA LOU (3768)	
	TURPIN JUANITA B (3768)	
	DOBBIE H C R (3768)	
	WOOD-CALLAHAN OIL CO (3801)	
	GEISLER S MOTEL (3810)	
	MOLINA CONRAD B (3810)	
	RUHLMAN DON (3810)	
	DANIEL DELMA J JR ARCHT (3811)	
	JOHNSON LOWELL W INS (3811)	
	JOHNSON MILLER & WILSON INS (3011)	
	POWER & DANIEL ARCHTS (3811)	
	POWER PALMER W ARCHT (3811)	
	RASTELLO G M ACCTNT (3811)	
	TOLLEFSON G O ACCTNT (3811)	
	WILSON HOWARD INS (3811)	
	ALCORN W V R (3818)	
	CREST MOTEL (3826)	
	COOK HERBERT O R (3832)	
	DUFFY DEAN A (3836)	
	MCCORD J E R (3836)	
	THOMPSON ENGINEERING (3839)	
	MORRIS STANLEY F MD (3850)	
	NORMAN S P MD (3850)	
	ROSS-LOOS MEDICAL GROUP (3850)	
	SWARTZ REX F (3850)	
	ULMAN HERSHEL MD (3850)	
	LOS CERRITOS TEXACO SERV (3860)	
	LAUGHTER MARVIN SERV (3901)	
	PARKS SERV STNS LONG BEACH (3910)	
	GAVIN S DRUG STORE (3911)	
	DINNER BELL THE RESTRNT (3918)	
	HALL E L & CO ACCTNTS (3918)	
	KEN S OF LONG BCH (3918)	
	LOS CERRITOS FLOWER SHOP (3923)	
	LOS CERRITOS MKT (3923)	

Year	Uses	Source
1954	(continued)	
	LOS CERRITOS MKT (3923)	
	R B FLORIST (3923)	
	LOS CERRITOS LIQUORS (3925)	
	MATHEWSON U LQR (3925)	
	P3PPSHIRLEE (3931)	
	CHIEF MOTEL (3932)	
	LACKEY WM D DR DC (3941)	
	LA LINDA MOTEL (3945)	
	INNERST H L R (3948)	
	PHILO FRANK G MD (3949)	
	CRAYDON CLNRS & DYERS (4001)	
	SCOTT & ASSOCIATES INS (4003)	
	WELCH KENNETH D RL EST (4005)	
	WELCH KENNETH D RL EST (4005)	
	ALIF PHYSICIANS SERV (4008)	
	BLUE SHIELD MEDICAL & HOSPITAL PLAN (4008)	
	TULLY S ANTIQUES (4010)	
	SMITH F S MRS (4017)	
	PEG S & EDDIE S CAFE (4020)	
	GOGLE LEONARD H (4024)	
	KRUG MILDRED S (4024)	
	MATHIS JAS B LT USAF (4024)	
	PARCEL TW (4024)	
	SILVER SPUR LIQUOR MART (4030)	
	CARLTON MOTEL (4034)	
	VOSPER S C R (4040)	
	MALLETT H A (4045)	
1955	Address Not Listed in Research Source	R. L. Polk & Co.
1956	Address Not Listed in Research Source	Pacific Telephone
1957	**LONG-BEACH**	Pacific Telephone
	METAL PRODUCTS ENGINEERING INC STMPNG (4000)	
	LONG BEACH AVE E	Pacific Telephone
	FLO S BROILER RESTRET (3430)	
	HAMULL FLORENCE S (3430)	

Year	Uses	Source
1957	(continued)	
	LONG BEACH WAR SURPLUS (3515)	
	LONG BCH ENGINE REBUILDERS (3535)	
	GUARDIAN FENCE CO (3550)	
	APPLE VALLEY BUILDING & DEVELOPING CO (3590)	
	APPLE VALLEY INN (3590)	
	CROSS RODMAN K GEOLGST (3591)	
	DUNLAP D D OIL CO (3591)	
	SIEVERS WM E CORP THE (3591)	
	SLAVERS CB (3591)	
	THIRTY SIX HUNDRED OPPORTUNITIES BROKRS (3600)	
	THIRTY SIX HUNDRED OPPORTUNITIES BROKRS (3600)	
	ADAMS MORGAN LATHAM KRIPP & WRIGHT ENGNRS (3601)	
	ADVANCED ENGINEERING & SUPPLY CORP (3601)	
	ADVANCED ENGINEERING & SUPPLY CORP (3601)	
	MORGAN & ADAMS ARCHTS (3601)	
	MORGAN CHAS P ENGNR (3601)	
	SOUTHLAND HEATING & AIR CONDITIONING INC (3601)	
	SCHLUMBERGER WELL SURVEYING CORP (3611)	
	SUNSET FENCE & PATIO CO (3626)	
	BAYER CHAS P INS (3633)	
	BRUNO THELMA INS (3633)	
	DECKERT LOMA M INS (3633)	
	DECKERT S INS SERV (3633)	
	GLEASON M L INS (3633)	
	KESLER JOS P CO INS (3633)	
	MAHL INS AGCY - GARFID 4 0785 (3633)	
	MILLER HAROLD P ACCT (3633)	
	MILLER JAS E INS (3633)	
	PENN MUTUAL LIFE INS CO (3633)	
	RIX ROHT G INS (3633)	
	TEFFT LYAI S RL EST (3633)	
	WRIGHT A A INS (3633)	
	GERLING DENTAL LAB (3635)	
	TONN ELVERNE M ONTST (3635)	
	WALKER ROBT V DOTST (3635)	
	ADAMFFS PETER DDS (3645)	

Year	Uses	Source
1957	(continued)	
	BICKNELL GORDON H DDS (3645)	
	RONNAU JOHN B DDS (3645)	
	SCOTT WM N MD (3645)	
	LECN SE S-THE WESTRN SHOP (3648)	
	WESTRN SHOP THE-LECOMBE S (3648)	
	KARNS J F MTRCYLS (3654)	
	RAINBOW AUTO LAUNDRY AUTO SVC (3700)	
	VIC-MAR MOTEL (3716)	
	CALL DERRALL & CHLOE DANCNG (3720)	
	CALL S FINE ARTS CENTER (3720)	
	FINE ARTS CENTER CALL S (3720)	
	GRUBER BERNARD CHIROPTR (3726)	
	JUNE WM A (3726)	
	MCFADDEN JOHN E (3726)	
	PISTOLE LEWIS (3732)	
	ALDERMAN E N (3734)	
	LUAN S LITTLE WOMEN DRESSES (3734)	
	BECKER S A NURSERY (3737)	
	BLOSSOM SHOP THE (3737)	
	HODGES NURSERY & LANDSCAPING CO (3737)	
	ROBINSON WM F NURSERY (3737)	
	CONNECTICUT GENL LIFE INS CO (3740)	
	DE COUDRES CHAS F CONNECTICUT GENL LIFE INS CO (3740)	
	SHIELDS & WHITESIDES INS (3740)	
	ANFINSON LOUIS J INSLONG BEACH (3745)	
	ARLINGTON OIL CO (3745)	
	ARNOLD & EATON INS (3745)	
	ARNOLD BUCK C H INS (3745)	
	BIXBY KNOLLS INS AGCY (3745)	
	BONNER C J CO (3745)	
	BROWS ROBT E JR INS (3745)	
	EATON & ARNOLD INS (3745)	
	EATON & ARNOLD-LONG BCH UNDERWRITERS INCINS (3745)	
	EON DON INS (3745)	
	INDUSTRIAL INDEMNITY CO (3745)	
	LAKEWOOD DISTRIBUTING CO (3745)	

Year	Uses	Source
1957 (continued)	LONG BCH UNDERWRITERS INC-ARNOLD & EATONINS (3745)	
	NEW ENGLAND MUTUAL LIFE INS CO OF BOSTON (3745)	
	PATTERSON KENINS (3745)	
	BOARD OF REALTORS (3747)	
	LONG BCH BOARD OF REALTORS (3747)	
	AMERICAN STONE CO (3750)	
	WESTRN MORTGAGECORP (3750)	
	BUSS ELEANOR N ACCTNT (3752)	
	MARSHALL & MURPHY CPA S (3752)	
	MARSHALL WALTER R ACCTNT (3752)	
	MURPHY JOHN P ACCTNT (3752)	
	NISHKIA & MA & CO (3754)	
	REDENBACH BEN GASLINE (3754)	
	HOLMQUIST MORRIS RL CST (3756)	
	HOLMQUIST MORRIS RL CST (3756)	
	RLCHEY FRANK H M LRTGD (3758)	
	BISHOPP E F (3768)	
	BLMWNG ROSS A (3768)	
	DOBBIE HC (3768)	
	MURPHY CLEL B (3768)	
	OROULRKE PATRICK M (3768)	
	SHANAHAN HARRIET H (3768)	
	TREES JESSIE E (3768)	
	WOOD-CALLAHAN OIL CO (3801)	
	GEISLER S MOTEL (3810)	
	RUHLMAN DON (3810)	
	A-RENTALS CO (3811)	
	DANIEL DELMA J JR ARCHT (3811)	
	GRIPP LEONARD J ACCTNT (3811)	
	JOHNSON LOWELL W INS (3811)	
	JOHNSON MILLER & WILSON INS - (3811)	
	POWER & DANIEL ARCHTS (3811)	
	POWER PALMER W ARCHT (3811)	
	TOLLEFSON ACCTNT (3811)	
	WILSON HOWARD INS (3811)	
	ALCORN WV (3818)	

Year	Uses	Source
1957	(continued)	
	CREST MOTEL (3826)	
	DE SWARTE C G ENGNR (3827)	
	COOK HERBERT (3832)	
	KILLINGSWORTH BRADY & SMITH ARCHTS (3833)	
	KILLINGSWORTH EDW A ARCHT (3833)	
	SMITH WAUGH ARCHT (3833)	
	DUEFY DEAN A (3836)	
	MCCORD J E (3836)	
	RAY IDA (3836)	
	YOUNGBLOOD NONA (3836)	
	WHITE ALBERT D ATTY (3839)	
	PHILLIPS ANNE C DECRTR (3840)	
	TLFNHWESTEREN MUTUAL INS CO (3841)	
	OVERMAN LAWSON TRAVEL AGCY (3845)	
	CLAYPOOL C E DENTIST (3850)	
	NORMAN S P MD (3850)	
	OMRRIS STANLEY F MD (3850)	
	POMICTER LOMNA S MD (3850)	
	ROSS-LOOS MEDICAL GROUP (3850)	
	SWARTZ REX F (3850)	
	PAYNE W S JR ENGNR (3851)	
	GARBER S RED TEXACO SERV (3860)	
	LAUGHTER MARVIN SERV (3901)	
	PARKS SERV STNSLONG BEACH (3910)	
	GAVIN S DI UG STORE (3911)	
	DINNER BELL THE RESTRIML (3918)	
	KEN S OF LONG BCH (3918)	
	LOS CERRITOS FLOWER SHOP (3923)	
	LOS CERRITOS MKT (3923)	
	LOS CERRITOS MKT (3923)	
	PAWSON R B FLORIST (3923)	
	LOS CERRITOS LIQUORS (3925)	
	MATHEWSON L J LQR (3925)	
	MATT S LOS CERRITOS LIQUORS (3925)	
	PUTNAM BEAUTY SHOP (3931)	
	CHIEF MOTEL (3932)	

Year	Uses	Source
1957 (continued)	CLAXTON JACK (3932)	
	GRAYDEN CLEANERS & DYERS (3937)	
	TERRY S BEAUTY SALON (3939)	
	TERRY S DISTINCTIVE HAIR DESIGNS (3939)	
	LACKEY WINNETKA DD DC (3941)	
	CONNELL GEORGIA (3945)	
	ORRIS CLIFFORD R (3945)	
	INNERST H L (3948)	
	PHILO FRANK G MD (3949)	
	LONISTAL KATHERINE RL EST (4001)	
	METRO INS AGCY (4004)	
	METRO REALTY CO (4004)	
	BOONE DANL INS (4005)	
	STATE FARM INSURANCE COMPANIES (4005)	
	BLUE SHIELD MEDICAL & HOSPITAL PLAN (4008)	
	CALIF PHYSICIANS SERV (4008)	
	TALLY S ANTIQUES (4010)	
	HANKLINS LEONARD B ATTY (4014)	
	QUINN HUGH D ACCTNT (4014)	
	DEMPSEY MERLE INS (4017)	
	WELCH KENNETH 0 RL EST (4017)	
	WELCH KENNETH 0 RL EST (4017)	
	PEG S & EDDIE S CAFE (4020)	
	BLAIR CLINTON C BARBR (4024)	
	KORTH EVELYN R (4024)	
	KRUG MILDRED S (4024)	
	MCCRACKEN ART (4024)	
	PARCEL T W (4024)	
	SILVER SPUR LIQUOR MART (4030)	
	CARLTON MOTEL (4034)	
	VOSPER JESSIE B (4040)	
	MALLETT H A (4045)	
	BRAYTON WINNETKA H ATTY (4047)	
	BRAYTON-CLOCK (4047)	
	BROOKS JOKE W ATTY (4047)	
	CLOCK HENRY H ATTY (4047)	

Year	Uses	Source
1957	(continued)	
	CLOCK JOHN G ATTY (4047)	
	CLOCK WA ESTMAN & CLOCK ATTYS (4047)	
	WA ESTMAN R A ATTY (4047)	
	WOODARD CLINTON (38321)	
	LONG BEACH AVE	Pacific Telephone
	METAL PRODUCTS ENGINEERING INC STMPNG (4000)	
1958	**E 41ST ST**	Pacific Telephone
	EASTSIDE PATTERN & FOUNDRY CO (1707)	
	MILES ODELIA (1722)	
	TURNER THOS (1727)	
	LONG BEACH AVE E	Pacific Telephone
	SANTA CRUZ JOE H (4066)	
	LONG BEACH AVE W	Pacific Telephone
	PERCELL WM (4015)	
	ROYAL TEACIE (4057)	
	LONG BEACH	Pacific Telephone
	LONG BEACH AGCY JAMES E MILLER (3633)	
	PENN MUTUAL LIFE INS CO (3633)	
	LONS BEACH OFC (3850)	
	ROSS LOOS MEDICAL GROUP (3850)	
	LUPPEN LUPPE H METAL PRODUCTS ENGINEERING INC (4000)	
	METAL PRODUCTS ENGINEERING INC STMPNG (4000)	
	E 40TH PL	Pacific Telephone
	HOLLYWOOD PRODUCTS CO COSMETCS (1668)	
	WOOD PRODUCTS CO (1668)	
	VARNUM EXSELSA MRS (1673)	
	PRATT CHAS (1680)	
	WILLIAMS JAMISON (1685)	
	NUNEZ JUAN H (1708)	
	POTTS EARNEST (1722)	
	MARTIN WILL (1726)	
	BISHOP ROBT (1732)	
	BORZONE JOSE (1738)	
	MALDONADO ALFRED (1744)	
	OVALLE JENNIE (1744)	

Year	Uses	Source
1958	(continued)	
	OVALLE ROSARIO (1744)	
	DIAZ REFUGLO (1750)	
	KNAPP W J (1786)	
1960	**LONG BEACH**	Pacific Telephone
	METAL PRODUCTS ENGINEERING INC STMPNG (4000)	
	LONG BEACH AVE E	Pacific Telephone
	LAUGHINGHOUSE J W MOTORS INC (3430)	
	LONG BCH SURPLUS (3515)	
	LONG BEACH WAR SURPLUS (3515)	
	GUARDIAN FENCE CO (3550)	
	ENGINE SUPPLY CO (3553)	
	APPLE VALLEY BUILDING & DEVELOPING CO (3590)	
	APPLE VALLEY INN (3590)	
	CROSS RODMAN K GEOLGST (3591)	
	DEVITT ROBT M ATTY (3591)	
	DUNLAP D D OIL CO (3591)	
	BUSINESS SALES (3600)	
	SOUTHLAND HEATING & AIR CONDITIONING INC (3601)	
	SCHLUMBERGER WELL SURVEYING CORP (3611)	
	SUNSET FENCE & PATIO CO (3626)	
	ADAMS FRED G (3633)	
	ADAMS MORGAN LATHAM KRIPP & WRIGHT ENGNRS (3633)	
	ALDRICH FRANK C ATTY (3633)	
	BOYER CHAS P INS (3633)	
	BRUNO THELMA INS (3633)	
	CURRY PAUL P J (3633)	
	GLEASON M L INS (3633)	
	KESLER JOS P CO INS (3633)	
	MAHL INS AGCY (3633)	
	MILLER HAROLD P ACCT (3633)	
	MORGAN CHAS P ENGNR (3633)	
	MORGAN CHAS P ENGNR (3633)	
	PENN MUTUAL LIFE INS CO (3633)	
	REASON ROBT A INS (3633)	
	RIX ROBT G INS (3633)	
	TEFFT LYAL S RL EST (3633)	

Year	Uses	Source
1960 (continued)	WRIGHT A A INS (3633)	
	MEYER GENE PHILIP DNTST (3635)	
	WALKER ROBT V DNTST (3635)	
	RONNAU JOHN B DDS (3645)	
	SCOTT WM N MD (3645)	
	AUTORAMA AUTO PARTS CORP (3648)	
	KARNS J F MTRCYLS (3654)	
	CRUCHLEY TED AUTO WASHNG (3700)	
	RAINBOW AUTO LAUNDRY (3700)	
	WEBB JACK WATCH REPAIRING & JEWELERS (3700)	
	MONEY VIRGIL (3716)	
	ROYAL MOTEL (3716)	
	CALL DERRALL & CHLOE DNCNG (3720)	
	CALLS FINE ARTS CENTER (3720)	
	FINE ARTS CENTER CALLS (3720)	
	BERNARD GRUBER CHIRPRCTR (3726)	
	GRUBER BERNARD CHIRPRCTR LONG BEACH (3726)	
	LOOSE A F (3726)	
	PISTOLE LEWIS (3732)	
	KOHLMEIER WM K (3734)	
	LUAN S DRSES (3734)	
	LUAN S TEEN TOGS DRSES (3734)	
	BIXBY KNOLLS NURSERY (3737)	
	ROBINSON WM F NURSERY (3737)	
	CONNECTICUT GENL LIFE INS CO (3740)	
	DE COUDRES CHAS F CONNECTICUT GENL LIFE INS CO (3740)	
	SHIELDS MERL E INS (3740)	
	WHITESIDES LAWRENCE A & ASSOCIATES INS (3740)	
	ANFINSON LOUIS J INS (3745)	
	ARNOLD & EATON INS (3745)	
	ARNOLD BUCK C H INS (3745)	
	BIXBY KNOLLS INS AGCY (3745)	
	BONNER C J CO (3745)	
	BROWN ROBT E JR INS (3745)	
	EATON & ARNOLD INS (3745)	
	EATON DON INS (3745)	

Year	Uses	Source
1960 (continued)		
	INDUSTRIAL INDEMNITY CO (3745)	
	INDUSTRIAL UNDERWRITER (3745)	
	NEW ENGLAND MUTUAL LIFE INS CO BRUCE BARE AGCY LONG BEACH (3745)	
	PATTERSON KEN INS (3745)	
	POWERS HOWARD P ATTY (3745)	
	BOARD OF REALTORS (3747)	
	LONG BCH BOARD OF REALTORS (3747)	
	AMERICAN STONE CO (3750)	
	AGAJANIAN JOBBING CO (3752)	
	DAC MUTUAL FUNDS INC (3752)	
	MARSHALL WALTER R ACCTNT (3752)	
	WALTER R MARSHALL & CO CPA S (3752)	
	NISHKIAN M N & CO (3754)	
	GRIPP LEONARD J ACCT (3756)	
	GETZ GEORGE REAL ESTATE LOANS (3758)	
	RICHEY & GETZ RL EST LOANS (3758)	
	RICHEY FRANK H MORTGS (3758)	
	SO CALIF BLDG & LOAN ASSN (3758)	
	CHUCK & BILLS FLYING A SERV (3768)	
	HANCOCK OIL CO LONG BEACH (3777)	
	INTERNATL BUSINESS MACHINES CORP (3777)	
	KELLOGG K L & SONS DRLNG (3777)	
	KELLOGG OVERSEAS CORP (3777)	
	OILFIELD ENGINEERING CO (3777)	
	SIGNAL OIL AND GAS CO MARKETING DEPT GENL SALES OFC (3777)	
	WOOD CALLAHAN OIL CO OIL PRODUCERS (3801)	
	ARMOUR R C JR (3810)	
	GEISLERS MOTEL (3810)	
	COYLE EDMUND J MD (3811)	
	DANIEL DELMA J JR ARCHT (3811)	
	HALL E L ACCT PUB (3811)	
	KING HALL TOLTEFSON AND CO ACCTS (3811)	
	KING HAROLD L CPA (3811)	
	POWER & DANIEL ARCHT (3811)	
	POWER PALMER W ARCHT (3811)	

Year	Uses	Source
1960	(continued)	
	SOWERS C R MD (3811)	
	TILLY JOHN E MD (3811)	
	TOLLEFSON GERALD O ACCT PUB (3811)	
	ALCORN W V (3818)	
	CREST MOTEL (3826)	
	STUHL & LEE ENGNRS (3827)	
	CUMMINGS DAVID (3832)	
	BRADY JULES ARCHT (3833)	
	KILLINGSWORTH BRADY & SMITH ARCHTS (3833)	
	KILLINGSWORTH EDW A ARCHT LONG BEACH (3833)	
	SMITH WAUCH ARCHT (3833)	
	AMORIN JOHN S (3836)	
	BLYTH FRANK (3836)	
	COOK HERBERT O (3836)	
	INSTRON ENGINEERING CORP (3836)	
	OLSON HAROLD CPA (3837)	
	STATCO INC (3837)	
	WHITE ALBERT D ATTY (3839)	
	PHILLIPS ANNE G INC DECRTR (3840)	
	MACY J WINTHROP DR (3841)	
	LANDGREN & LANDGREN INS (3843)	
	LAWSON OVERMAN TRAVEL AGCY (3845)	
	OVERMAN LAWSON TRAVEL AGCY (3845)	
	MORRISON LOUIS D ATTY (3849)	
	CLAYPOOL C E DENTIST (3850)	
	MORRIS STANLEY F MD (3850)	
	NORMAN S P MD (3850)	
	POMICTER LORNA S MD (3850)	
	ROSS LOOS MEDICAL GROUP INGLEWOOD OFC (3850)	
	SWARTZ REX F (3850)	
	PAYNE OIL FIELD EQUIPT LEASING CO (3851)	
	PAYNE W S JR (3851)	
	LAUGHTER MARVIN SERV (3901)	
	PARKS TEXACO SERV STNS LONG BEACH (3910)	
	GAVINS DRUG STORE (3911)	
	BEAUCHAMP & RANDALL INS (3913)	

Year	Uses	Source
1960 (continued)	RANDALL PAUL A INS (3913)	
	RIPPERDAN EDWIN H ARCHT (3913)	
	RAE HAROLD FRANKLIN CHIRPDSTS LONG BEACH (3915)	
	KEN S PANCAKE PARADE RESTRNT (3918)	
	PANCAKE PARADE RESTRNT (3918)	
	KEN S OF LONG BCH (3920)	
	LOS CERRITOS MKT (3923)	
	LOS CERRITOS MKT (3923)	
	PAWSON R B DICK FLOWER SHOP (3923)	
	LOS CERRITOS LIQUORS (3925)	
	MATHEWSON L J LQR (3925)	
	MATTS LOS CERRITOS LIQUORS (3925)	
	CHIEF MOTEL (3932)	
	HODGES L B INDSCPE (3932)	
	KLINE FRED S (3932)	
	GRAYDON CLEANERS & DYERS (3937)	
	TERRY S BEAUTY SALON (3939)	
	TERRY S DISTINCTIVE HAIR DESIGNS (3939)	
	LACKEY WM D DR DC (3941)	
	MCCORMACK R M (3945)	
	STIEVE THELMA (3945)	
	INNERST H L (3948)	
	PHILO FRANK G MD (3949)	
	METAL PRODUCTS ENGINEERING INC STMPNG (4000)	
	METRO INS AGCY (4004)	
	METRO REALTY CO (4004)	
	HAWKINS WALTER J (4005)	
	PAC MUTUAL LIFE INS CO (4005)	
	BLUE SHIELD MEDICAL & HOSPITAL PLAN (4008)	
	CALIF PHYSICIANS SERV (4008)	
	TULLY S ANTIQUES (4010)	
	HANKINS LEONARD B ATTY (4014)	
	DEMPSEY MERLE INS (4017)	
	TUCKER INS SERV (4017)	
	TUCKER MERIT M (4017)	
	WELCH KENNETH D (4017)	

Year	Uses	Source
1960	(continued)	
	ZOE S CAFE (4020)	
	DENNIS JAS (4024)	
	KORTH EVELYN R (4024)	
	KRUG MILDRED S (4024)	
	MAC S LIQUOR & DELICATESSEN (4030)	
	CARLTON MOTEL (4034)	
	OVERLEY HARRY E (4034)	
	MORGAN CORA E (4040)	
	MORGAN CORA E (4040)	
	VOSPER JESSIE G (4040)	
	WILLIE MAY MOTEL (4045)	
	BRAYTON WM H ATTY (4047)	
	BRAYTON-CLOCK (4047)	
	BROOKS & CREE ATTYS (4047)	
	BROOKS JOHN W ATTY (4047)	
	CLOCK HENRY H ATTY (4047)	
	CLOCK JOHN G ATTY (4047)	
	CLOCK WAESTMAN & CLOCK ATTYS (4047)	
	CREE WM H JR ATTY (4047)	
	WAESTMAN R A ATTY (4047)	
1961	Address Not Listed in Research Source	Luskey Brothers & Co
1962	**E 41ST**	Pacific Telephone
	EASTSIDE PATTERN & FOUNDRY CO (1707)	
	MATANOVICH AL (1715)	
	GREEN ROSETTA (1722)	
	MARK WALKER GARDENER (1727)	
	WALKER MARK (1727)	
	CHILE KING CAFE (1730)	
	LONG BEACH AVE E	Pacific Telephone
	KAB KOOL COOLERS (4000)	
	LUPPEN LUPPE H METAL PRODUCTS ENGINEERING INC STMPNG (4000)	
	METAL PRODUCTS ENGINEERING INC STMPNG (4000)	
	JOES SERV STN (4050)	
	WILLIAMS EARL B (4066)	
	WILLIAMS MATTIE (4066)	

Year	Uses	Source
1962 (continued)		
	LONG BEACH AVE W	Pacific Telephone
	DOTIE EDD (4015)	
	DOTIE MAPLE (4015)	
	LONG BEACH	Pacific Telephone
	INTERNATL BUSINESS MACHS CORP LONG BEACH OFC (3777)	
	LONG BEACH OFC (3850)	
	ROSS LOSS MEDICAL GROUP (3850)	
	E 40TH PL	Pacific Telephone
	KIRKPATRICK EVA MAE (1662)	
	LEWIS EULA M (1662)	
	ROLFE RUTH (1662)	
	BELL PEGGY (1667)	
	HOLLYWOOD PRODUCTS CO COSMETCS (1668)	
	WOOD PRODUCTS CO (1668)	
	VARNUM EXSBSA MRS (1673)	
	NUNEZ JUAN H (1708)	
	POTTS EARNEST (1722)	
	BORZONE JOSE (1738)	
	OVALLE JENNIE (1744)	
	OVALLE FELIX (1744)	
	DIAZ REFUGIO (1750)	
1963	Address Not Listed in Research Source	Pacific Telephone
1964	**LONG BEACH AVE E**	Pacific Telephone
	LAUGHINGHOUSE J W MOTORS INC (3430)	
	LONG BCH SURPLUS LONG BEACH (3515)	
	LONG BEACH WAR SURPLUS LONG BEACH (3515)	
	CARPENTER RAY INS AGCY (3520)	
	DAVENPORT DEVELOPMENT CO (3520)	
	DENBLE BILL CO (3520)	
	FORTUNE HOMES (3520)	
	FRANKLIN CHAS RL EST (3520)	
	ME & TEX CORP (3520)	
	PERRIN DAVID INC LONG BEACH (3520)	
	ROSELLE S DRSES LONG BEACH (3520)	

Year	Uses	Source
1964 (continued)		
	. TALLICHET INVESTMENT CO (3520)	
	THE ESTATES CO (3520)	
	WENDT LEE & PERRIN INC RL EST (3520)	
	ENGINE SUPPLY CO (3525)	
	LONG BEACH ENGINE REBUILDERS LONG BEACH (3525)	
	GIBBS DONALD ARCHT (3575)	
	GIBBS HUGH & GIBBS DONALD ARCHTS (3575)	
	GIBBS HUGH ARCHT (3575)	
	APPLE VALLEY BUILDING & DEVELOPING CO (3590)	
	APPLE VALLEY INN (3590)	
	CROSS RODMAN K GEOLOST (3591)	
	DUNLAP D D OIL CO (3591)	
	SIEVERS INC (3591)	
	STEROLINE CORP (3591)	
	BUSINESS SALES (3600)	
	CRAYNE CHARLIE (3600)	
	SOUTHLAND HEATING & AIR CONDITIONING (3601)	
	A A & I CORP (3610)	
	ALBRIGHT C C (3610)	
	BAKER FARNHAM & BEGAN ATTYS (3610)	
	BAKER JAS J ATTY (3610)	
	BEGAN WM D ALTY (3610)	
	BURGESS CLARK CO REALTORS (3610)	
	DAVIS KENNETH R ACCT (3610)	
	FARNHAM DANL W ATTY (3610)	
	JACKSON J M OIL PRODCR (3610)	
	MCDONALD JAS G MECHL ENGNR (3610)	
	PRIOR RICHARD O ARCHT (3610)	
	RIPPERDAN EDWIN H ARCHT (3610)	
	TUCKER DONALD J ACCT PUB (3610)	
	WYATT E E INS AGT (3610)	
	SCHLUMBERGER WELL SURVEYING CORP (3611)	
	PFASLEY GERALD W CPA (3620)	
	SUNSET FENCE & PATIO CO (3626)	
	ADAMS FRED G (3633)	
	ADAMS LATHAM KRIPP & WRIGHT ENGNRS (3633)	

Year	Uses	Source
1964 (continued)		
	ALDRICH FRANK C ATTY LONG BEACH (3633)	
	ALLEN RICK E ATTY LONG BEACH (3633)	
	ANTONELLI & RICE INS LONG BEACH (3633)	
	BERGER JOHN K INS (3633)	
	BUSINESS CONSULTANTS INC ATTYS (3633)	
	KESLER JOS P CO INS (3633)	
	KRIPP ROBT M (3633)	
	LATHAM ROBT E (3633)	
	MAHL INS AGCY (3633)	
	MILLER JAS E INS (3633)	
	MORGAN CHAS P & ASSOCIATES ENGNRS CONSLTNG (3633)	
	PENN MUTUAL LIFE INSURANCE COMPANY (3633)	
	PENN MUTUAL LIFE INSURANCE COMPANY (3633)	
	SALES & MARKETING EXECUTIVES OF LONG BCH (3633)	
	SELAS CORP OF AMERICA LONG BEACH (3633)	
	WILLHOIT ENGINEERING CORP CONTRS GENL (3633)	
	WILLHOIT J D RL EST (3633)	
	WRIGHT A A (3633)	
	WRIGHT REED M (3633)	
	KOZAN DENTAL LAB (3635)	
	SCOTT WINFIELD R DDS LONG BEACH (3635)	
	WALKER ROBT V DNTST (3635)	
	MILLER FREEMAN PUBLICATIONS (3648)	
	PAC FISHERMAN MAGAZINE (3648)	
	SEA & PAC MOTORBOAT MAGAZINE (3648)	
	WESTRN BAKER MAGAZINE (3648)	
	LAWRENCE H S FINANCE COMPANY (3650)	
	HARLEY DAVIDSON OF LONG BCH MOTRCYLS (3654)	
	KARNS J F (3654)	
	CRUCHLEY AUTO WASH (3700)	
	CRUCHLEY TED AUTO WASHNG (3700)	
	DELGADO CLYDE P (3716)	
	ROYAL MOTEL (3716)	
	CALL S FINE ARTS CENTER LONG BEACH (3720)	
	FINE ARTS CENTER CALLS (3720)	
	GUDER RUSSELL & CO CPA (3726)	

Year	Uses	Source
1964 (continued)	GUDER RUSSELL O CPA (3726)	
	RUSSELL GUDER & CO CPAS (3726)	
	PISTOLE LEWIS (3732)	
	LOANS TEEN TOGS DRSES (3734)	
	LUAN S DRSES (3734)	
	HODGES L B NRSRY (3737)	
	LANDSCAPE NURSERY (3737)	
	CONNECTICUT GENL LIFE INS CO (3740)	
	SHIELDS & ASSOCIATES (3740)	
	SHIELDS MERL E INS (3740)	
	WEST CHAS & ASSOCIATES (3740)	
	WHITESIDES LAWRENCE A & ASSOCIATES INS (3740)	
	ANPINSON LOUIS INS (3745)	
	BARNES EARL A ATTY (3745)	
	BIXBY KNOLLS INS AGCY (3745)	
	INDUSTRIAL INDEMNITY CO (3745)	
	INDUSTRIAL UNDERWRITERS (3745)	
	MERRITT ALLEY INS (3745)	
	MOORE REALTY (3745)	
	MOORE REALTY RESIDENTIAL DIV (3745)	
	PATTERSON KEN INS (3745)	
	BOARD OF REALTORS (3747)	
	LONG BCH DIST BOARD OF REALTORS LONG BEACH (3747)	
	NISHKIAN M A & CO (3754)	
	JACUZZI WHIRLPOOL BATH (3756)	
	GETZ GEORGE RL EST LOANS (3758)	
	RICHEY & GETZ INC RL EST LOANS (3758)	
	SO CALIF SAVINGS & LOAN ASSN (3758)	
	KEN S FLYING A SERV (3768)	
	I B M CORP (3777)	
	KELLOGG K L & SONS DRLNG (3777)	
	KELLOGG OVERSEAS CORP (3777)	
	OILFIELD ENGINEERING CO (3777)	
	PERSONNEL EMPLOYMENT AGCY LONG BEACH (3777)	
	PERSONNEL RESEARCH & DEVELOPMENT LONG BEACH (3777)	
	URETHANE ENGINEERING & CONSTRUCTION CO (3777)	

Year	Uses	Source
1964 (continued)	WOOD-CALLAHAN OIL CO (3801)	
	GEISLERS MOTEL (3810)	
	BOOTH JOHN W APPRSR (3811)	
	BOWDLE BOOTH & DRUMM APPRAISERS (3811)	
	BOWDLE RALPH S APPRSR (3811)	
	DANIEL DELMA J JR ARCHT (3811)	
	FRANKLIN E DEES & CO STEEL DISTRS (3811)	
	POWER & DANIEL ARCHTS LONG BEACH (3811)	
	POWER PALMER W ARCHT LONG BEACH (3811)	
	ALCORN W V (3818)	
	AMERICAN GENL LIFE INS CO (3821)	
	AMERICAN GENL LIFE INS CO (3821)	
	B W ACCEPTANCE CORP FINANCNG (3821)	
	INSURANCE COMPANIES INSPECTION BUREAU INC (3821)	
	OUTHUYSE W J LONG BEACH (3821)	
	SHATTUCK HAL INS (3821)	
	STANDARD REGISTER CO THE PRNTR (3821)	
	WORSHAM & ASSOCIATES INC INS (3821)	
	WORSHAM & ASSOCIATES INC TRAVL BUR (3821)	
	CREST MOTEL (3826)	
	COOK NELLIE F (3832)	
	BRADY JULES ARCHT (3833)	
	KILLINGSWORTH BRADY & ASSOCIATE ARCHTS (3833)	
	KILLINGSWORTH EDW A ARCHT (3833)	
	INSTRON ENGINEERING CORP (3836)	
	GRABYAN MICHAEL J SR (3836)	
	MCKENNA & OLSON CPAS (3837)	
	OLSON HAROLD CPA (3837)	
	PHILLIPS ANNE G INC DECRTR (3840)	
	PHILLIPS WELLINGLTON L SR (3840)	
	MACY J WINTHROP DR LONG BEACH (3841)	
	HARMS HARVEY & ASSOCIATES (3843)	
	PROVIDENT LIFE & ACCIDENT INS CO (3843)	
	BLUE SHIELD MEDICAL & HOSPITAL PLAN (3844)	
	CALIF PHYSICIAN S SERV (3844)	
	LAWSON OVERMAN TRAVEL AGCY (3845)	

Year	Uses	Source
1964 (continued)	OVERMAN LAWSON TRAVEL AGCY (3845)	
	PECKHAM EUGENE G (3849)	
	OLAYPOOL C E DENTIST (3850)	
	MORRIS STANLEY F MD (3850)	
	NORMAN S P MD (3850)	
	ROSS-LOOS MEDICAL GROUP (3850)	
	SWARTZ REX F MD (3850)	
	ANGEL FOOD DO-NUT DRIVE-IN (3860)	
	PARKS TEXACO SERV STNS (3910)	
	GAVIN S DRUG STORE (3911)	
	BEAUCHAMP EARL INS AGCY (3913)	
	BENNETT DWIGHT E ARCHT (3913)	
	RAE HAROLD FRANKLIN CHIRPDST (3915)	
	KEN S RESTAURANT (3918)	
	KEN S DRIVE INS DIXEY KNOLLS (3920)	
	LOS CERRITOS MKT (3923)	
	LOS CERRITOS MKT (3923)	
	PAWSON R B DICK FLOWER SHOP (3923)	
	RENO S FLOWER SHOP (3923)	
	DIVERSIFIED BUSINESS ENTERPRISES (3925)	
	MCCLAIN ALICE G (3925)	
	NANCY & KAREN S HAIR FASHIONS (3927)	
	AMERICAN BUSINESS SERV (3929)	
	CHIEF MOTEL (3932)	
	WIGGINS THOS L (3935)	
	GRAYDON CLEANERS & DYERS (3937)	
	MARTIN & LEWIS HAIR STYLISTS (3939)	
	LACKEY WM D DR DC (3941)	
	HELMS JACK W (3945)	
	ULRICH ARTHUR M LONG BEACH (3945)	
	INNERST H L (3948)	
	PHILO FRANK G MD (3949)	
	METAL PRODUCTS ENGINEERING INC STMPNG (4000)	
	METRO INS AGCY (4004)	
	METRO REALTY CO (4004)	
	PACIFIC MUTUAL LIFE INSURANCE COMPANY (4005)	

Year	Uses	Source
1964	(continued)	
	TULLYS ANTIQUES (4010)	
	BRITANNICA ENCYCLOPAEDIA (4014)	
	ENCYCLOPAEDIA BRITANNICA (4014)	
	FORD ORLAND L INS (4014)	
	GARR GEO & ASSOCIATES CPAS (4014)	
	HANKINS LEONARD B ATTY (4014)	
	JOHNSON B R INS (4014)	
	LEVIN DOROTHY ATTY (4014)	
	LUCAS GLEN D ATTY (4014)	
	MAACO DEVELOPEMENT CO (4014)	
	MILLS WALLACE V CPA (4014)	
	MORRISON LOUIS D ATTY (4014)	
	RICHARDS M C REALTY (4014)	
	SAMUEL & LUCAS ATTYS LONG BEACH (4014)	
	SAMUEL CHAS E ATTY LONG BEACH (4014)	
	SPENCER JENNIE (4014)	
	SPONGBERG GARY INS AGCY (4014)	
	WESTINGHOUSE CREDIT CORP (4014)	
	WESTLAND LIFE INS CO (4014)	
	WELCH KENNETH D (4017)	
	GUS S CAFE (4020)	
	KORTH EVELYN R (4024)	
	KRUG MILDRED S (4024)	
	ROSS WM A (4024)	
	MAC S LIQUOR & DELICATESSEN LONG BEACH (4030)	
	CARLTON MOTEL (4034)	
	MCALLISTER & HANSON INC RL EST (4034)	
	SHARP IRENE E (4040)	
	BIXBY KNOLLS MOTEL (4045)	
	BROOKS JOHN W ATTY (4047)	
	CLOCK HENRY H ATTY (4047)	
	CLOCK JOHN G ATTY (4047)	
	CLOCK WAESTMAN & CLOCK ATTYS (4047)	
	CREE WM H JR ATTY (4047)	
	WAESTMAN R A ATTY (4047)	
	ASSOCIATES DISCOUNT CORP (4067)	

Year	Uses	Source
1964	(continued)	
	ASSOCIATES FINANCE CO OF CALIF (4067)	
	EMMCO INS CO (4067)	
1965	Address Not Listed in Research Source	GTE
1966	**LONG BEACH AVE**	Pacific Telephone
	METAL PRODUCTS ENGINEERING INC STMPNG (4000)	
1967	**E 41ST ST**	R. L. Polk & Co.
	LITA CHAIR MFG CO (1709)	
	BUTLER HENRY (1714)	
	MATANOVICH AL (1715)	
	GREEN ROSETTA (1722)	
	MARK WALKER GARDENR (1727)	
	WALKER MARK (1727)	
	CHILE KING CAFE (1730)	
	WHITESON COLOR & CHEMICAL CO (1733)	
	LONG BEACH AVE E	R. L. Polk & Co.
	KAB OOL COOLERS (4000)	
	LUPPEN LUPPE H METAL PRODUCTS ENGINEERING INC STMPNG (4000)	
	METAL PRODUCTS ENGINEERING INC STMPNG (4000)	
	PAMDA TOOL CO DIV OF METAL PRODUCTS ENGINEERING INC (4000)	
	LONG BEACH AVE W	R. L. Polk & Co.
	DOTIE VERTIE (4015)	
	E 40TH PL	R. L. Polk & Co.
	ROLFE RUTH (1662)	
	COOK EUGENE EDW (1667)	
	HOLLYWOOD PRODUCTS CO COSMETCS (1668)	
	WOOD PRODUCTS CO (1668)	
	WOOD PRODUCTS CO (1668)	
	VARNUM ANNA (1673)	
	OVALLE JENNIE (1744)	
1969	Address Not Listed in Research Source	Pacific Telephone
1970	Address Not Listed in Research Source	R. L. POLK & CO.
1971	**E 41ST**	B&G Publications

Year	Uses	Source
1971	(continued)	
	SAUNDERS BEN (1715)	
	GREEN ROSETTA (1722)	
	WALKER MARK (1727)	
	CHILE KING CAFE (1730)	
	LONG BEACH AVE E	B&G Publications
	KAB KOOL COOLERS (4000)	
	LUPPEN LUPPE H METAL PRODUCTS ENGINEERING INC STMPNG (4000)	
	METAL PRODUCTS ENGINEERING INC STMPNG (4000)	
	LONG BEACH AVE W	B&G Publications
	RICKETTS BROS WRECKING CO (4009)	
	DOTIE VERTIE (4015)	
	JACKSON ADELL (4017)	
	GORTER TEMPLE BAPTIST CHURCH (4069)	
	E 40TH PL	B&G Publications
	ROLFE RUTH (1662)	
	COOK EUGENE EDW (1667)	
	VARNUM EXSELSA L (1673)	
	MILL CRAFT FURNITURE CO INC (1680)	
1972	Address Not Listed in Research Source	R. L. Polk & Co.
1975	Address Not Listed in Research Source	Pacific Telephone
1976	**LONG BEACH AVE**	R.L. Polk & co Publishers
	ANTHONY METAL FINISHERS (4000)	
	RICKETTS BROS WRECKING CO (4009)	
	DOTIE VERTIE (4015)	
	JACKSON ADELL (4017)	
	GORTER TEMPLE BAPTIST CHURCH (4069)	
	40TH PL	R.L. Polk & co Publishers
	KIRKPATRICK EVA MAE (1662)	
	ROLFE RUTH (1662)	
	COOK EUGENE EDW (1667)	
1980	**LONG BEACH AVE W**	Pacific Telephone
	CADMIUM &T NICKEL PLATING (3400)	
	LONG BEACH BLVD	Pacific Telephone

Year	Uses	Source
1980 (continued)	KELLY SERVICES LOS ANGELES (3832)	
1981	**LONG BEACH AVE W**	Pacific Telephone
	RICKETTS HOUSER (4009)	
	WILLIAMS TONY A (4015)	
	JACKSON ADELL (4017)	
	LONG BEACH AVE	Pacific Telephone
	VICTORY PAPER CO INC EAST (4000)	
	LONG BEACH PL	Pacific Telephone
	GIBBS HUGH & GIBBS DONALD ARCHTS LONG BEACH (3575)	
1985	**LONG BEACH AVE**	Pacific Bell
	TRIEX (3400)	
	LONG BEACH BLVD	Pacific Bell
	OFFICE SYSTEMS OF CALIF INC (3550)	
1986	**LONG BEACH AVE**	Pacific Bell
	OLIN WATER SERVICES EAST (3312)	
	E 40TH PL	Pacific Bell
	COAST SHIPPERS (1680)	
	RAYMONDS DECORATIVE LITE CO (1680)	
	FLANAGAN MOTOR EXPRESS & WHSE CO (1709)	
1990	**E 40TH PL**	Pacific Bell
	PENA ARMANDO (1661)	
	CONDO VICTOR HUGO (1662)	
	DE LA TORRE ELIAS (1662)	
	TORO GUADALUPE C (1662)	
	RIVAS IRMA ESTHER (1667)	
	COAST SHIPPERS (1680)	
	RAYMOND S DECORATIVE LITE CO (1680)	
1991	**LONG BEACH**	Pacific Bell
	STARLINE ENGINEERING CO P O BOX (3585)	
	SURVEY RESEARCH GROUP P O BOX (3765)	
	CARPETERIA (3939)	
	CARPETBAGGERS P O BOX (3939)	
	YACHT PRIDE P O BOX (3962)	
1995	**E 41ST**	Pacific Bell Telephone

Year	Uses	Source
1995 (continued)	METRO CARPETS (1708)	
	ROMERO JORGE (1708)	
	E 40TH PL	Pacific Bell Telephone
	CENTRAL TRADING (1668)	
	CAL-PADS (1680)	
	LONG BEACH AVE W	Pacific Bell Telephone
	WILLIAMS VERTIE (4015)	
	JACKSON ADELL (4017)	
	E 40TH PL	Pacific Bell Telephone
	GONZALEZ NICOLAS M (1662)	
	AMAYA GERBER HUMBERTO (1673)	
1996	Address Not Listed in Research Source	GTE
1999	Address Not Listed in Research Source	Haines Company
2000	**41ST_E**	Pacific Bell Telephone
	GONZALES REFUGIO (1706)	
	FRANCISCO S AUTO REPAIR (1708)	
	LIANG CHING (1722)	
	LONG BEACH AVE W	Pacific Bell Telephone
	DILL JAMES (4009)	
	DOTIE VERTIE (4015)	
	WILLIAMS VERTIE (4015)	
	JACKSON ADELL (4017)	
	DONIS BICYCLE REPAIR (4065)	
	MARTIN LUTHER KING JR BLVD E	Pacific Bell Telephone
	PAC INDUSTRIAL METAL CORP (1725)	
	40TH PL E	Pacific Bell Telephone
	JONES ODESSA (1661)	
	GONZALEZ NICOLAS M (1662)	
	MALDONADO CARLOS (1667)	
	LOPEZ IRMA ESTHER (1667)	
	PREMIER DRINKING WATER (1668)	
	ULLOA RIGOBERTO (1673)	
	CAL PADS (1680)	

Year	Uses	Source
2001	Address Not Listed In Research Source	Haines & Company, Inc.
2003	Address Not Listed In Research Source	Haines & Company
2004	Address Not Listed In Research Source	Haines Company

APPENDIX G
SITE PHOTOGRAPHS

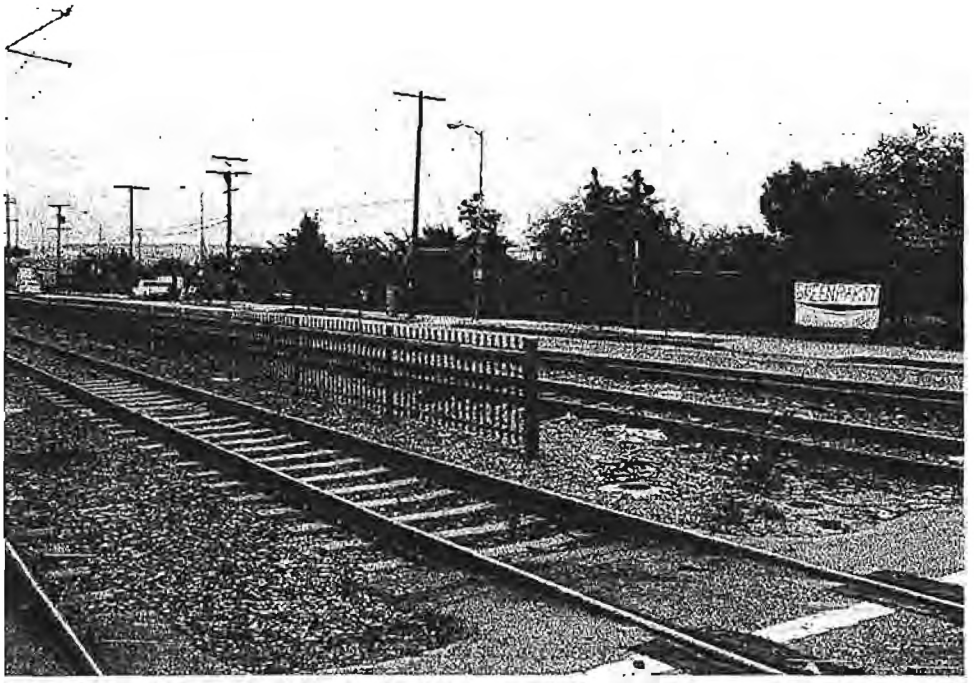


Photo #1: View of portions of the Site from the southwest.



Photo #2: View of portions of the Site from the southeast.

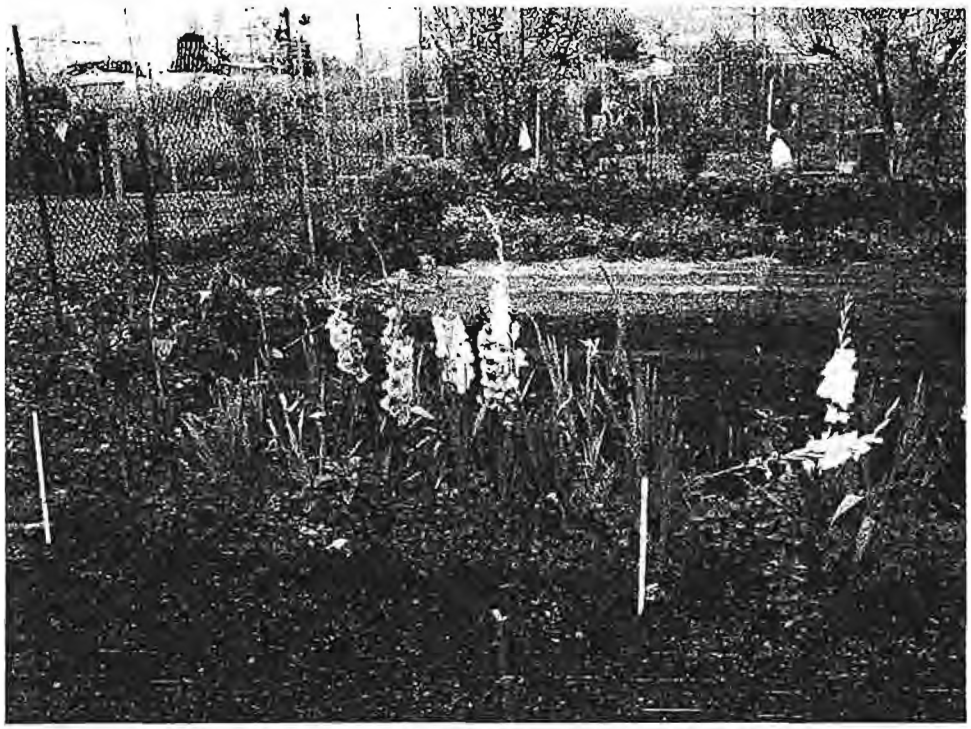


Photo #3: Typical farm plot.

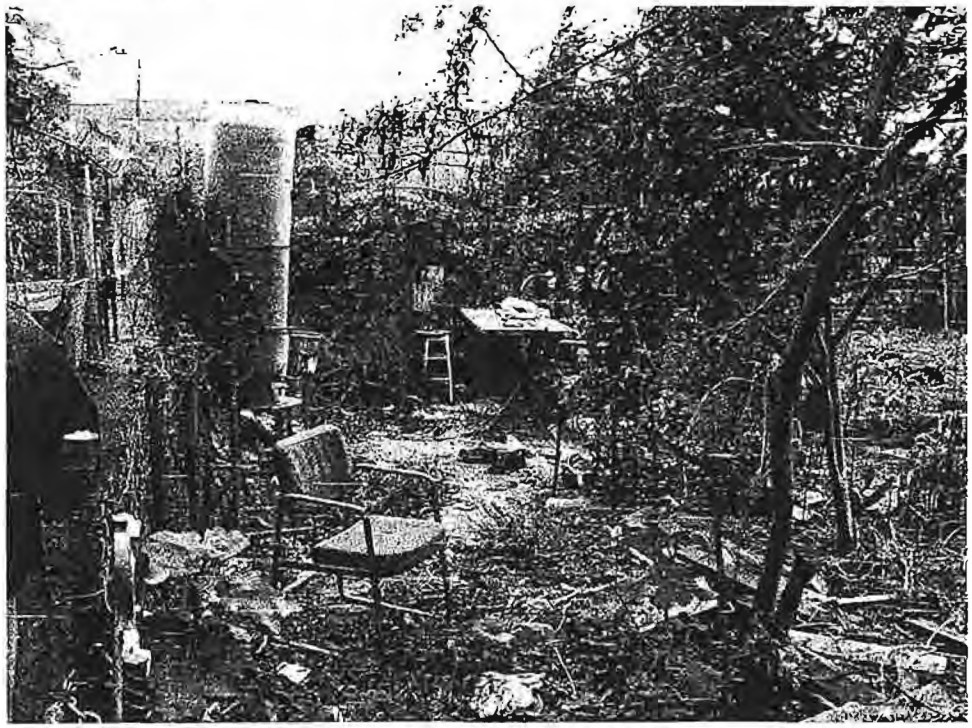


Photo #4: Farm plot with miscellaneous trash and debris.



Photo #5: Typical pathway between farm plots.



Photo #6: Common area in the southwestern portion of the Site.



Photo #7: Portion of East 40th Place on the Site.



Photo #8: Typical 55-gallon drum used for a trash can.



Photo #9: Hazardous materials/waste storage area along East 40th Place.



Photo #10: Canopy area within East 40th Place.

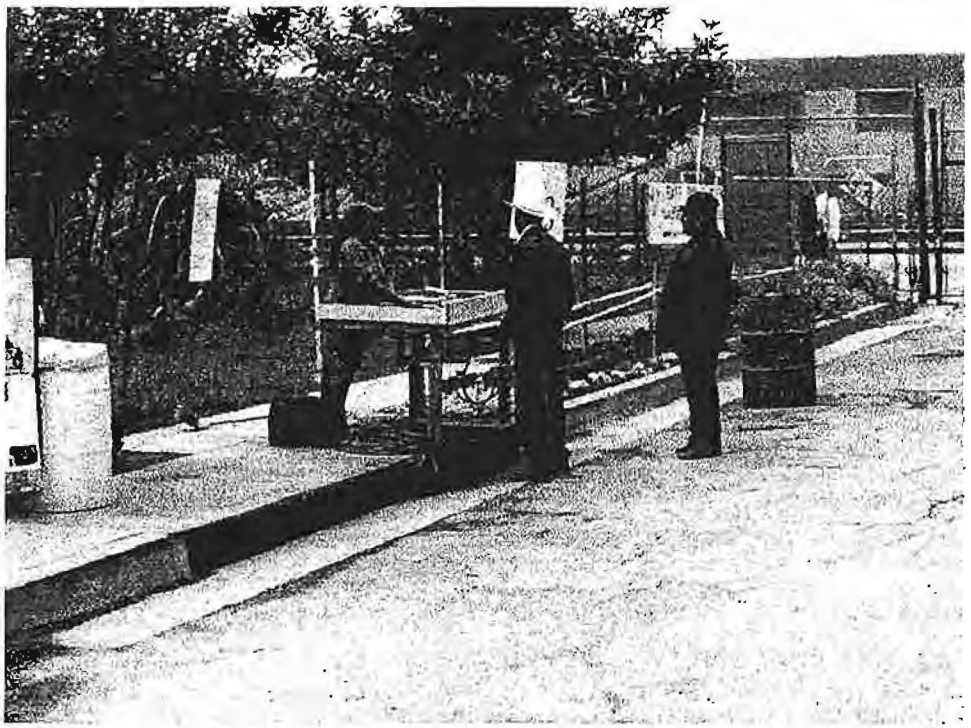


Photo #11: Vegetable wash area along East 40th Place. Discharge is to the underlying storm drain inlet.

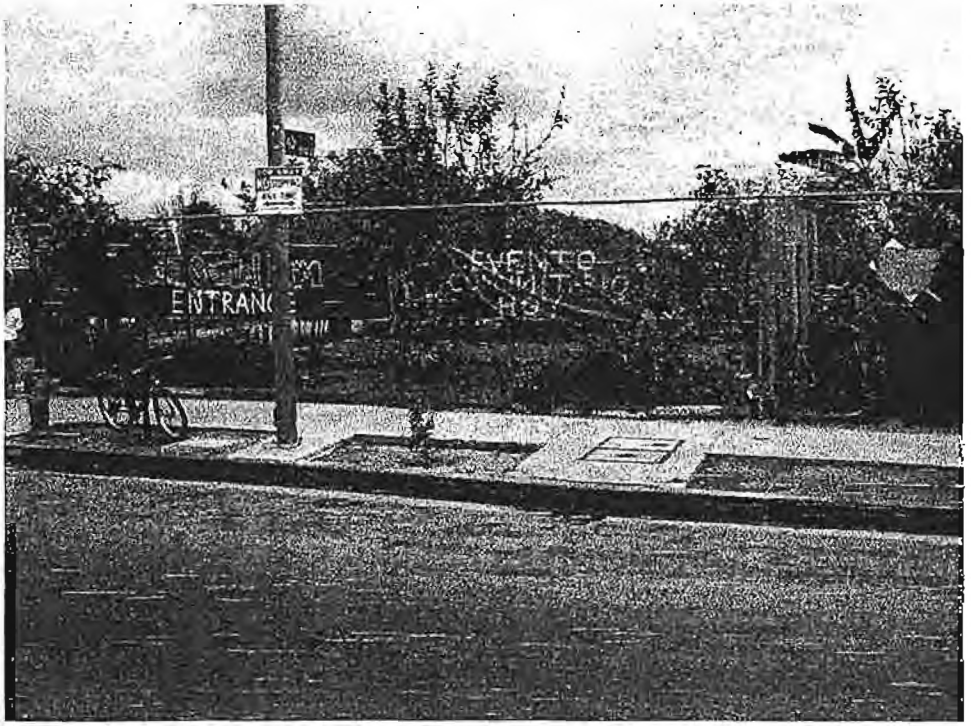


Photo #12: Former gasoline station area on the Site.

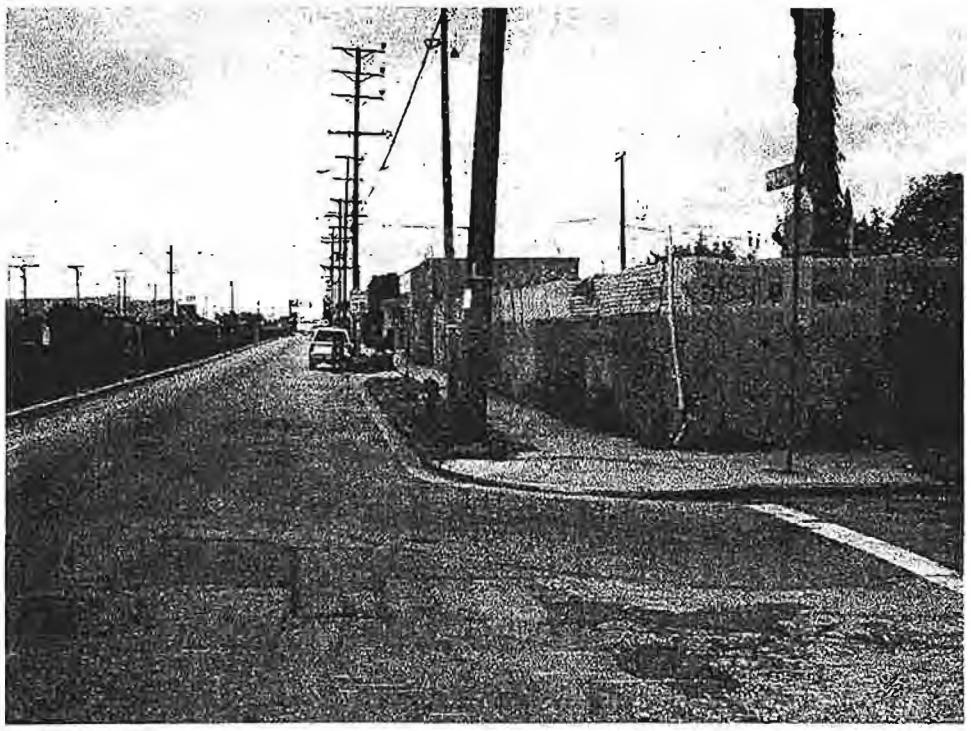


Photo #13: Western adjacent commercial/light-industrial properties along Long Beach Avenue.



Photo #14: Southern adjacent commercial/light-industrial properties (right) along East 41st Street.

APPENDIX H
TABLES OF ANALYTICAL DATA

Table 1 - Soil Analytical Testing Summary - Petroleum Hydrocarbons and VOCs
South Central Farms, Los Angeles, California

Sample Designation (Depth in Feet)	TPH (mg/kg) EPA 8015 modified	VOCs (mg/kg) EPA 8260B
Composite B1, B2, B3,B4-0.5'	ND	ND
Composite B5, B6, B7,B8-0.5'	ND	ND
Composite B9, B10, B11,B12-0.5'	ND	ND
B1-5'	ND	–
B1-10'	ND	–
B1-15'	ND	ND
B1-20'	ND	ND
B2-5'	ND	–
B2-10'	ND	–
B2-15'	ND	ND
B2-20'	ND	ND
Detection Limit	10	Varies (0.005-0.025)

mg/kg - milligrams per kilogram
– sample not analyzed
ND - Not detected at or above the laboratory detection limit

Table 2 - Soil Analytical Testing Summary - Title 22 Metals
South Central Farms, Los Angeles, California

Sample Designation/ Depth (ft)	Title 22 Metals Results in milligrams per kilogram (mg/kg)																
	Antimony	Arsenic	Barium	Beryllium	Cadmium	Chromium	Cobalt	Copper	Lead	Mercury	Molyb	Nickel	Selenium	Silver	Thallium	Vanadium	Zinc
Composite B1, B2, B3,B4-0.5'	ND	3.28	157	ND	1.10	18.6	8.12	55.9	126	0.14	1.08	15.0	ND	ND	ND	29.9	264
Composite B5, B6, B7,B8-0.5'	ND	36.6	154	0.58	0.77	19.0	9.59	30.2	72.8	0.15	1.10	13.1	ND	ND	ND	38.9	139
Composite B9, B10, B11,B12-0.5'	ND	4.99	654	ND	0.83	18.9	9.61	251	147	0.20	ND	13.0	ND	ND	ND	35.0	486
B1-0.5'	—	4.23	—	—	1.14	—	—	—	252	—	—	—	—	—	—	—	—
B1-1.5'	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
B1-3'	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
B2-0.5'	—	3.85	—	—	0.972	—	—	—	110	—	—	—	—	—	—	—	—
B2-1.5'	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
B2-3'	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
B3-0.5'	—	4.64	—	—	1.45	—	—	—	152	—	—	—	—	—	—	—	—
B3-1.5'	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
B3-3'	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
B4-0.5'	—	2.93	—	—	1.16	—	—	—	153	—	—	—	—	—	—	—	—
B4-1.5'	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
B4-3'	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
B5-0.5'	—	3.24	—	—	0.628	—	—	—	36.1	—	—	—	—	—	—	—	—
B5-1.5'	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
B5-3'	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
B6-0.5'	—	90.3	—	—	1.01	—	—	—	144	—	—	—	—	—	—	—	—
B6-1.5'	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
B6-3'	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
B7-0.5'	—	5.56	—	—	1.15	—	—	—	107	—	—	—	—	—	—	—	—
B7-1.5'	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
B7-3'	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
B8-0.5'	—	3.2	—	—	ND	—	—	—	17.5	—	—	—	—	—	—	—	—
B8-1.5'	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
B8-3'	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
B9-0.5'	—	1.94	—	—	0.55	—	—	—	78.8	—	—	—	—	—	—	—	—
B9-1.5'	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
B9-3'	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
B10-0.5'	—	8.09	—	—	1.90	—	—	—	354	—	—	—	—	—	—	—	—
B10-1.5'	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
B10-3'	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
B11-0.5'	—	3.68	—	—	1.08	—	—	—	112	—	—	—	—	—	—	—	—
B11-1.5'	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
B11-3'	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Table 2 - Soil Analytical Testing Summary - Title 22 Metals
South Central Farms, Los Angeles, California

Sample Designation/ Depth (ft)	Title 22 Metals Results in milligrams per kilogram (mg/kg)																
	Antimony	Arsenic	Barium	Beryllium	Cadmium	Chromium	Cobalt	Copper	Lead	Mercury	Molyb	Nickel	Selenium	Silver	Thallium	Vanadium	Zinc
B12-0.5'	---	3.23	---	---	0.91	---	---	---	115	---	---	---	---	---	---	---	---
B12-1.5'	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---
B12-3'	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---
Detection Limit	3.0	1.00	1.0	0.500	0.5	1.00	0.50	1.00	0.5	0.14	1.00	1.50	1.0	0.5	1.0	0.5	5
1/4 CHHSL-R	7.5	0.0175	1300	37.5	0.425	NA	165	750	37.5	4.5	95	400	95	95	1.25	132.5	5750
CHHSL-R	30	0.07	5200	150	1.7	NA	660	3000	150	18	380	1600	380	380	5	530	23000
1/4 CHHSL-CI	95	0.06	15750	425	1.875	NA	800	9500	875	45	1200	4000	1200	1200	15.75	1675	25000
CHHSL-CI	380	0.24	63000	1700	7.5	NA	3200	38000	3500	180	4800	16000	4800	4800	63	6700	100000
1/4 PRG-R	PRGs Not Used for Comparative Criteria					52.5	PRGs Not Used for Comparative Criteria										
1/4 PRG-I						1125											

ND - Not detected
N/A - Not applicable
(---) - Not analyzed
CHHSL-R - California Human Health Screening Level for residential soil
CHHSL-CI - California Human Health Screening Level for commercial/industrial soil
PRG-R - United States Environmental Protection Agency Region 9 Preliminary Remediation Goal for residential soil
PRG-I - United States Environmental Protection Agency Region 9 Preliminary Remediation Goal for industrial soil
Concentrations in bold exceed one or more of the above referenced regulatory criteria (discrete samples only)

APPENDIX I
ANALYTICAL LABORATORY REPORTS AND CHAIN-OF-CUSTODY DOCUMENTATION

BASELINE ON-SITE ANALYSIS

Baseline On-Site Analysis
P. O. Box 2243
Huntington Beach, CA 92647

Toll Free: 888.753.7553
FAX: 714.840.1584

Laboratory Report

Client: Advantage Environmental Consultants, LLC
Client Address: 810 Los Vallecitos Boulevard, Suite 210
San Marcos, California 92069

Report Date: 5/12/06
Lab Project Number: 06200
Client Project Number: 06-027SD

Project Name: SCF
Project Address: —
Los Angeles, California
Contact: Daniel A. Weis

Dates Sampled: 5/3/06
Dates Received: 5/3/06
Dates Analyzed: 5/7/06
Sample Matrix: Soil

Analyses Requested:

1. **EPA 8015m – Total Petroleum Hydrocarbons with Carbon Chain Distribution (8015M)**
2. **EPA 8260B – Volatile Organic Compounds with Fuel Oxygenates**

Baseline received samples collected from the project shown above. A Chain-of-Custody Record (COC) is attached.

All of the samples were analyzed for the parameters shown above per the COC. In this report, *Baseline* presents the results and a QA/QC summary for these analyses.

Brian K. Kato

Approved
Brian K. Kato, Laboratory Manager

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Laboratory Report

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San Marcos, California 92069

Report Date: 5/12/06
Lab Project Number: 06200
Client Project Number: 06-027SD

Project Name: SCF
Project Address: ---
Los Angeles, California
Contact: Daniel A. Weis

Dates Sampled: 5/3/06
Dates Received: 5/3/06
Dates Analyzed: 5/7/06
Sample Matrix 1: Soil

Total Petroleum Hydrocarbons (TPH, C6 through C36) with Carbon Chain Distribution Results

Constituent:	TPH (C_6-C_{36})	TPH (C_6-C_{12})	TPH (C_{13}-C_{28})	TPH (C_{29}-C_{36})
Method:	8015M	8015M	8015M	8015M
Units:	mg/kg	mg/kg	mg/kg	mg/kg
Sample ID				
COMP (B1, B2, B3, B4)	ND<10	ND<10	ND<10	ND<10
COMP (B5, B6, B7, B8)	ND<10	ND<10	ND<10	ND<10
COMP (B9, B10, B11, B12)	ND<10	ND<10	ND<10	ND<10
B1-5	ND<10	ND<10	ND<10	ND<10
B1-10	ND<10	ND<10	ND<10	ND<10
B1-15	ND<10	ND<10	ND<10	ND<10
B1-20	ND<10	ND<10	ND<10	ND<10
B2-5	ND<10	ND<10	ND<10	ND<10
B2-10	ND<10	ND<10	ND<10	ND<10
B2-15	ND<10	ND<10	ND<10	ND<10
B2-20	ND<10	ND<10	ND<10	ND<10
Method Blank	ND<10	ND<10	ND<10	ND<10

COMP (B1, B2, B3, B4): Composite of samples B1-0.5, B2-0.5, B3-0.5, B4-0.5
COMP (B5, B6, B7, B8): Composite of samples B5-0.5, B6-0.5, B7-0.5, B8-0.5
COMP (B9, B10, B11, B12): Composite of samples B9-0.5, B10-0.5, B11-0.5, B12-0.5
ND: Not detected at the indicated reporting limit

BASELINE ON-SITE ANALYSIS™

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Huntington Beach, CA 92647

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FAX: 714.840.1584

Laboratory Report

Client: Advantage Environmental Consultants, LLC
Client Address: 810 Los Vallecitos Boulevard, Suite 210
San Marcos, California 92069

Project Name: SCF
Project Address: ---
Los Angeles, California
Contact: Daniel A. Weis

Report Date: 5/12/06
Lab Project Number: 06200
Client Project Number: 06-027SD

Dates Sampled: 5/3/06
Dates Received: 5/3/06
Dates Analyzed: 5/7/06
Sample Matrix: Soil

Volatile Organic Compounds (EPA 8260B) - Part I

EPA Method:	8260B	8260B	8260B	8260B	8260B	8260B
Units:	µg/kg	µg/kg	µg/kg	µg/kg	µg/kg	µg/kg
Dilution Factor:	1	1	1	1	1	1
Sample ID:	**COMP (B1, B2, B3, B4)**	**COMP (B5, B6, B7, B8)**	**COMP (B9, B10, B11, B12)**	**B1-15**	**B1-20**	**B2-15**
Compound Name						
Volatile Aromatics (BTEX)						
Benzene	ND<5.0	ND<5.0	ND<5.0	ND<5.0	ND<5.0	ND<5.0
Toluene	ND<5.0	ND<5.0	ND<5.0	ND<5.0	ND<5.0	ND<5.0
Ethylbenzene	ND<5.0	ND<5.0	ND<5.0	ND<5.0	ND<5.0	ND<5.0
Total Xylenes	ND<5.0	ND<5.0	ND<5.0	ND<5.0	ND<5.0	ND<5.0
Fuel Oxygenates						
Methyl t-Butyl Ether (MTBE)	ND<5.0	ND<5.0	ND<5.0	ND<5.0	ND<5.0	ND<5.0
t-Butanol (TBA)	ND<25	ND<25	ND<25	ND<25	ND<25	ND<25
Di-Isopropyl Ether (DIPE)	ND<5.0	ND<5.0	ND<5.0	ND<5.0	ND<5.0	ND<5.0
Ethyl t-Butyl Ether (ETBE)	ND<5.0	ND<5.0	ND<5.0	ND<5.0	ND<5.0	ND<5.0
t-Amyl Methyl Ether (TAME)	ND<5.0	ND<5.0	ND<5.0	ND<5.0	ND<5.0	ND<5.0
Non-Halogenated VOC's						
n-Butylbenzene	ND<5.0	ND<5.0	ND<5.0	ND<5.0	ND<5.0	ND<5.0
sec-Butylbenzene	ND<5.0	ND<5.0	ND<5.0	ND<5.0	ND<5.0	ND<5.0
tert-Butylbenzene	ND<5.0	ND<5.0	ND<5.0	ND<5.0	ND<5.0	ND<5.0
Isopropylbenzene	ND<5.0	ND<5.0	ND<5.0	ND<5.0	ND<5.0	ND<5.0
p-Isopropyltoluene	ND<5.0	ND<5.0	ND<5.0	ND<5.0	ND<5.0	ND<5.0
Naphthalene	ND<5.0	ND<5.0	ND<5.0	ND<5.0	ND<5.0	ND<5.0
n-Propylbenzene	ND<5.0	ND<5.0	ND<5.0	ND<5.0	ND<5.0	ND<5.0
Styrene	ND<5.0	ND<5.0	ND<5.0	ND<5.0	ND<5.0	ND<5.0
1,2,4-Trimethylbenzene	ND<5.0	ND<5.0	ND<5.0	ND<5.0	ND<5.0	ND<5.0
1,3,5-Trimethylbenzene	ND<5.0	ND<5.0	ND<5.0	ND<5.0	ND<5.0	ND<5.0
Halogenated VOC's (HVOC's)						
Bromobenzene	ND<5.0	ND<5.0	ND<5.0	ND<5.0	ND<5.0	ND<5.0
Bromochloromethane	ND<5.0	ND<5.0	ND<5.0	ND<5.0	ND<5.0	ND<5.0
Bromoform	ND<5.0	ND<5.0	ND<5.0	ND<5.0	ND<5.0	ND<5.0
Bromomethane	ND<5.0	ND<5.0	ND<5.0	ND<5.0	ND<5.0	ND<5.0
Carbon Tetrachloride	ND<5.0	ND<5.0	ND<5.0	ND<5.0	ND<5.0	ND<5.0
2-Chlorotoluene	ND<5.0	ND<5.0	ND<5.0	ND<5.0	ND<5.0	ND<5.0
4-Chlorotoluene	ND<5.0	ND<5.0	ND<5.0	ND<5.0	ND<5.0	ND<5.0
Chlorobenzene	ND<5.0	ND<5.0	ND<5.0	ND<5.0	ND<5.0	ND<5.0
Chloroethane	ND<5.0	ND<5.0	ND<5.0	ND<5.0	ND<5.0	ND<5.0
Chloroform	ND<5.0	ND<5.0	ND<5.0	ND<5.0	ND<5.0	ND<5.0
Chloromethane	ND<5.0	ND<5.0	ND<5.0	ND<5.0	ND<5.0	ND<5.0

ND: Not detected at the indicated reporting limit; MB: Method Blank

BASELINE ONSITE ANALYSIS

Baseline On-Site Analysis
P. O. Box 2243
Huntington Beach, CA 92647

Toll Free: 888.753.7553
FAX: 714.840.1584

Laboratory Report

Client: Advantage Environmental Consultants, LLC
Client Address: 810 Los Vallecitos Boulevard, Suite 210
San Marcos, California 92069

Report Date: 5/12/06
Lab Project Number: 06200
Client Project Number: 06-027SD

Project Name: SCF
Project Address: —
Los Angeles, California
Contact: Daniel A. Wels

Dates Sampled: 5/3/06
Dates Received: 5/3/06
Dates Analyzed: 5/7/06
Sample Matrix: Soil

Volatile Organic Compounds (EPA 8260B) - Part II

EPA Method:	8260B	8260B	8260B	8260B	8260B	8260B
Units:	µg/kg	µg/kg	µg/kg	µg/kg	µg/kg	µg/kg
Dilution Factor:	1	1	1	1	1	1
Sample ID:	COMP (B1, B2, B3, B4)	COMP (B5, B6, B7, B8)	COMP (B9, B10, B11, B12)	B1-15	B1-20	B2-15
Compound Name						
HVOC's continued						
Dibromochloromethane	ND<5.0	ND<5.0	ND<5.0	ND<5.0	ND<5.0	ND<5.0
1,2-Dibromo-3-Chloropropane	ND<5.0	ND<5.0	ND<5.0	ND<5.0	ND<5.0	ND<5.0
1,2-Dibromomethane	ND<5.0	ND<5.0	ND<5.0	ND<5.0	ND<5.0	ND<5.0
1,2-Dichlorobenzene	ND<5.0	ND<5.0	ND<5.0	ND<5.0	ND<5.0	ND<5.0
1,3-Dichlorobenzene	ND<5.0	ND<5.0	ND<5.0	ND<5.0	ND<5.0	ND<5.0
1,4-Dichlorobenzene	ND<5.0	ND<5.0	ND<5.0	ND<5.0	ND<5.0	ND<5.0
Dichlorodifluoromethane	ND<5.0	ND<5.0	ND<5.0	ND<5.0	ND<5.0	ND<5.0
1,1-Dichloroethane	ND<5.0	ND<5.0	ND<5.0	ND<5.0	ND<5.0	ND<5.0
1,2-Dichloroethane	ND<5.0	ND<5.0	ND<5.0	ND<5.0	ND<5.0	ND<5.0
1,1-Dichloroethene	ND<5.0	ND<5.0	ND<5.0	ND<5.0	ND<5.0	ND<5.0
cis-1,2-Dichloroethene	ND<5.0	ND<5.0	ND<5.0	ND<5.0	ND<5.0	ND<5.0
trans-1,2-Dichloroethene	ND<5.0	ND<5.0	ND<5.0	ND<5.0	ND<5.0	ND<5.0
1,2-Dichloropropane	ND<5.0	ND<5.0	ND<5.0	ND<5.0	ND<5.0	ND<5.0
1,3-Dichloropropane	ND<5.0	ND<5.0	ND<5.0	ND<5.0	ND<5.0	ND<5.0
2,2-Dichloropropane	ND<5.0	ND<5.0	ND<5.0	ND<5.0	ND<5.0	ND<5.0
1,1-Dichloropropene	ND<5.0	ND<5.0	ND<5.0	ND<5.0	ND<5.0	ND<5.0
Hexachlorobutadiene	ND<5.0	ND<5.0	ND<5.0	ND<5.0	ND<5.0	ND<5.0
Methylene Chloride	ND<5.0	ND<5.0	ND<5.0	ND<5.0	ND<5.0	ND<5.0
Tetrachloroethene	ND<5.0	ND<5.0	ND<5.0	ND<5.0	ND<5.0	ND<5.0
1,1,1,2-Tetrachloroethane	ND<5.0	ND<5.0	ND<5.0	ND<5.0	ND<5.0	ND<5.0
1,1,2,2-Tetrachloroethane	ND<5.0	ND<5.0	ND<5.0	ND<5.0	ND<5.0	ND<5.0
1,2,3-Trichlorobenzene	ND<5.0	ND<5.0	ND<5.0	ND<5.0	ND<5.0	ND<5.0
1,2,4-Trichlorobenzene	ND<5.0	ND<5.0	ND<5.0	ND<5.0	ND<5.0	ND<5.0
1,1,1-Trichloroethane	ND<5.0	ND<5.0	ND<5.0	ND<5.0	ND<5.0	ND<5.0
1,1,2-Trichloroethane	ND<5.0	ND<5.0	ND<5.0	ND<5.0	ND<5.0	ND<5.0
Trichloroethene	ND<5.0	ND<5.0	ND<5.0	ND<5.0	ND<5.0	ND<5.0
Trichlorofluoromethane	ND<5.0	ND<5.0	ND<5.0	ND<5.0	ND<5.0	ND<5.0
1,2,3-Trichloropropane	ND<5.0	ND<5.0	ND<5.0	ND<5.0	ND<5.0	ND<5.0
Vinyl Chloride	ND<5.0	ND<5.0	ND<5.0	ND<5.0	ND<5.0	ND<5.0

ND: Not detected at the indicated reporting limit; MB: Method Blank

BASELINE ON-SITE ANALYSIS™

Baseline On-Site Analysis
P. O. Box 2243
Huntington Beach, CA 92647

Toll Free: 888.753.7553
FAX: 714.840.1584

Laboratory Report

Client: Advantage Environmental Consultants, LLC
Client Address: 810 Los Vallecitos Boulevard, Suite 210
San Marcos, California 92069

Project Name: SCF
Project Address: —
Los Angeles, California
Contact: Daniel A. Wels

Report Date: 5/12/06
Lab Project Number: 06200
Client Project Number: 06-027SD

Dates Sampled: 5/3/06
Dates Received: 5/3/06
Dates Analyzed: 5/7/06
Sample Matrix: Soil

Volatile Organic Compounds (EPA 8260B) - Part I

EPA Method:	8260B		8260B
Units:	µg/kg		µg/kg
Dilution Factor:	1		1
Sample ID:	B2-20		Method Blank
Compound Name			
Volatile Aromatics (BTEX)			
Benzene	ND<5.0		ND<5.0
Toluene	ND<5.0		ND<5.0
Ethylbenzene	ND<5.0		ND<5.0
Total Xylenes	ND<5.0		ND<5.0
Fuel Oxygenates			
Methyl t-Butyl Ether (MTBE)	ND<5.0		ND<5.0
t-Butanol (TBA)	ND<25		ND<25
Di-Isopropyl Ether (DIPE)	ND<5.0		ND<5.0
Ethyl t-Butyl Ether (ETBE)	ND<5.0		ND<5.0
t-Amyl Methyl Ether (TAME)	ND<5.0		ND<5.0
Non-Halogenated VOC's			
n-Butylbenzene	ND<5.0		ND<5.0
sec-Butylbenzene	ND<5.0		ND<5.0
tert-Butylbenzene	ND<5.0		ND<5.0
Isopropylbenzene	ND<5.0		ND<5.0
p-Isopropyltoluene	ND<5.0		ND<5.0
Naphthalene	ND<5.0		ND<5.0
n-Propylbenzene	ND<5.0		ND<5.0
Styrene	ND<5.0		ND<5.0
1,2,4-Trimethylbenzene	ND<5.0		ND<5.0
1,3,5-Trimethylbenzene	ND<5.0		ND<5.0
Halogenated VOC's (HVOC's)			
Bromobenzene	ND<5.0		ND<5.0
Bromochloromethane	ND<5.0		ND<5.0
Bromoform	ND<5.0		ND<5.0
Bromomethane	ND<5.0		ND<5.0
Carbon Tetrachloride	ND<5.0		ND<5.0
2-Chlorotoluene	ND<5.0		ND<5.0
4-Chlorotoluene	ND<5.0		ND<5.0
Chlorobenzene	ND<5.0		ND<5.0
Chloroethane	ND<5.0		ND<5.0
Chloroform	ND<5.0		ND<5.0
Chloromethane	ND<5.0		ND<5.0

ND: Not detected at the indicated reporting limit; MB: Method Blank

BASELINE ON-SITE ANALYSIS™

Baseline On-Site Analysis
P. O. Box 2243
Huntington Beach, CA 92647

Toll Free: 888.753.7553
FAX: 714.840.1584

Laboratory Report

Client: Advantage Environmental Consultants, LLC
Client Address: 810 Los Vallecitos Boulevard, Suite 210
San Marcos, California 92069

Report Date: 5/12/06
Lab Project Number: 06200
Client Project Number: 06-027SD

Project Name: SCF
Project Address: —
Los Angeles, California
Contact: Daniel A. Weis

Dates Sampled: 5/3/06
Dates Received: 5/3/06
Dates Analyzed: 5/7/06
Sample Matrix: Soil

Volatile Organic Compounds (EPA 8260B) - Part II

EPA Method:	8260B		8260B
Units:	µg/kg		µg/kg
Dilution Factor:	1		1
Sample ID:	**B2-20**		**Method Blank**
Compound Name			
HVOC's, continued			
Dibromochloromethane	ND<5.0		ND<5.0
1,2-Dibromo-3-Chloropropane	ND<5.0		ND<5.0
1,2-Dibromomethane	ND<5.0		ND<5.0
1,2-Dichlorobenzene	ND<5.0		ND<5.0
1,3-Dichlorobenzene	ND<5.0		ND<5.0
1,4-Dichlorobenzene	ND<5.0		ND<5.0
Dichlorodifluoromethane	ND<5.0		ND<5.0
1,1-Dichloroethane	ND<5.0		ND<5.0
1,2-Dichloroethane	ND<5.0		ND<5.0
1,1-Dichloroethene	ND<5.0		ND<5.0
cis-1,2-Dichloroethene	ND<5.0		ND<5.0
trans-1,2-Dichloroethene	ND<5.0		ND<5.0
1,2-Dichloropropane	ND<5.0		ND<5.0
1,3-Dichloropropane	ND<5.0		ND<5.0
2,2-Dichloropropane	ND<5.0		ND<5.0
1,1-Dichloropropene	ND<5.0		ND<5.0
Hexachlorobutadiene	ND<5.0		ND<5.0
Methylene Chloride	ND<5.0		ND<5.0
Tetrachloroethene	ND<5.0		ND<5.0
1,1,1,2-Tetrachloroethane	ND<5.0		ND<5.0
1,1,2,2-Tetrachloroethane	ND<5.0		ND<5.0
1,2,3-Trichlorobenzene	ND<5.0		ND<5.0
1,2,4-Trichlorobenzene	ND<5.0		ND<5.0
1,1,1-Trichloroethane	ND<5.0		ND<5.0
1,1,2-Trichloroethane	ND<5.0		ND<5.0
Trichloroethene	ND<5.0		ND<5.0
Trichlorofluoromethane	ND<5.0		ND<5.0
1,2,3-Trichloropropane	ND<5.0		ND<5.0
Vinyl Chloride	ND<5.0		ND<5.0

ND: Not detected at the indicated reporting limit; MB: Method Blank

Baseline On-Site Analysis
P. O. Box 2243
Huntington Beach, CA 92647

Toll Free: 888.753.7553
FAX: 714.840.1584

Laboratory Report

Client: Advantage Environmental Consultants, LLC
Client Address: 810 Los Vallecitos Boulevard, Suite 210
San Marcos, California 92069

Project Name: SCF
Project Address: ---
Los Angeles, California
Contact: Daniel A. Weis

Report Date: 5/12/06
Lab Project Number: 06200
Client Project Number: 06-027SD

Dates Sampled: 5/3/06
Dates Received: 5/3/06
Dates Analyzed: 5/7/06
Sample Matrix: Soil

Quality Control Summary

Analytes	MS Recovery (%)	MSD Recovery (%)	RPD (%)	QC Sample
8015M				
TPH, C6-C36	96	92	4	COMP1
8260B				
1,1-Dichloroethene	101	94	7	COMP1
Benzene	99	92	7	COMP1
Trichloroethene	102	93	9	COMP1
Toluene	96	89	8	COMP1
Chlorobenzene	99	94	5	COMP1
Acceptable QC Limits:	(65-135)	(65-135)	(0-30)	

MS: Matrix Spike; MSD: Matrix Spike Duplicate; RPD: Relative Percent Difference
LCS/LCSD: Lab Control Sample/Duplicate

Client Name	Project Name	Requested Analyses	CHAIN-OF-CUSTODY RECORD
Advantage Environmental	SCF		Page 1 of 1
Client Address	Project Address		Laboratory Project #:
810 Los Vallecitos Blvd. Ste. 210 San Marcos, CA 92069	LA, CA		06200
Phone: 760-744-3621 FAX: 760-744-3353	Project Number: 06-027 SD		
Contact: Dan Wiles			

Sample ID	Sampling Date	Sampling Time	Lab ID	Soil (S), Water (W), Vapor (V)	Number of Containers	8015cc	8260B (VOCs)	Comments
B1-0.5	5/3/06			S	1	Comp		Please Composite Equal Portions of Samples B1-0.5, B2-0.5, B3-0.5 AND B4-0.5 (B5-0.5, B6-0.5 B7-0.5 AND B8-0.5) (B9-0.5, B10-0.5 B11-0.5, AND B12-0.5 AND ANALYZE FOR 8015cc and 8260B Archive Remaining Portions of all Samples.
B1-5						X		
B1-10						X		
B1-15						X	X	
B1-20						X	X	
B2-0.5						Comp		
B2-5						X		
B2-10						X		
B2-15						X	X	
B2-20						X	X	
B3-0.5						Comp		
B4-0.5						Comp		
B5-0.5						Comp		
B6-0.5						Comp		
B7-0.5						Comp		
B8-0.5						Comp		
B9-0.5						Comp		
B10-0.5						Comp		
B11-0.5						Comp		
B12-0.5						Comp		
B7-4					1	X		

1. Relinquished by	2. Received by	Turnaround Time:
Signature: X	Signature: X	Special Instructions/Notes: Typical Advantage DL's - See Comments Regarding Composite Sample Testing
Date/Time:	Date/Time: 5/3/06; 17:17	
3. Relinquished by	4. Received by	Sample Condition: Sealed? Y / N Chilled? Y / N
Signature: X	Signature: X	
Date/Time:	Date/Time:	

P. O. Box 2243
Huntington Beach, California 92647
Telephone: (888) 753-7553
FAX: (714) 840-1584

ASSOCIATED LABORATORIES
806 North Batavia - Orange, California 92868 - 714/771-6900 *FAX 714/538-1209*

CLIENT Advantage Environmental (11606)
ATTN: Dan Weis
810 Los Vallecitos Blvd.
Ste. 210
San Marcos, CA 92069

LAB REQUEST 169214
REPORTED 05/12/2006
RECEIVED 05/03/2006

PROJECT #06-027-SD

SUBMITTER Client

COMMENTS

This laboratory request covers the following listed samples which were analyzed for the parameters indicated on the attached Analytical Result Report. All analyses were conducted using the appropriate methods as indicated on the report. This cover letter is an integral part of the final report.

Order No.	Client Sample Identification
708586	B1-0.5
708587	B1-1.5
708588	B1-3
708589	B2-0.5
708590	B2-1.5
708591	B2-3
708592	B3-0.5
708593	B3-1.5
708594	B3-3
708595	B4-0.5
708596	B4-1.5
708597	B4-3

Thank you for the opportunity to be of service to your company. Please feel free to call if there are any questions regarding this report or if we can be of further service.

ASSOCIATED LABORATORIES by,

Edward S. Behare, Ph.D.
Vice President

NOTE: Unless notified in writing, all samples will be discarded by appropriate disposal protocol 30 days from date reported.

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CLIENT Advantage Environmental (11606)
ATTN: Dan Weis
810 Los Vallecitos Blvd.
Ste. 210
San Marcos, CA 92069

LAB REQUEST 169214
REPORTED 05/12/2006
RECEIVED 05/03/2006

PROJECT #06-027-SD

SUBMITTER Client

COMMENTS

This laboratory request covers the following listed samples which were analyzed for the parameters indicated on the attached Analytical Result Report. All analyses were conducted using the appropriate methods as indicated on the report. This cover letter is an integral part of the final report.

Order No.	Client Sample Identification
708598	B5-0.5
708599	B5-1.5
708600	B5-3
708601	B6-0.5
708602	B6-1.5
708603	B6-3
708604	B7-0.5
708605	B7-1.5
708606	B7-3
708607	B8-0.5
708608	B8-1.5
708609	B8-3

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Vice President

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CLIENT Advantage Environmental (11606)
ATTN: Dan Weis
810 Los Vallecitos Blvd.
Ste. 210
San Marcos, CA 92069

LAB REQUEST 169214
REPORTED 05/12/2006
RECEIVED 05/03/2006

PROJECT #06-027-SD

SUBMITTER Client

COMMENTS

This laboratory request covers the following listed samples which were analyzed for the parameters indicated on the attached Analytical Result Report. All analyses were conducted using the appropriate methods as indicated on the report. This cover letter is an integral part of the final report.

Order No.	Client Sample Identification
708610	B9-0.5
708611	B9-1.5
708612	B9-3
708613	B10-0.5
708614	B10-1.5
708615	B10-3
708616	B11-0.5
708617	B11-1.5
708618	B11-3
708619	B12-0.5
708620	B12-1.5
708621	B12-3

Thank you for the opportunity to be of service to your company. Please feel free to call if there are any questions regarding this report or if we can be of further service.

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Edward S. Behare, Ph.D.
Vice President

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CLIENT Advantage Environmental (11606)
ATTN: Dan Weis
810 Los Vallecitos Blvd.
Ste. 210
San Marcos, CA 92069

LAB REQUEST 169214
REPORTED 05/12/2006
RECEIVED 05/03/2006

PROJECT #06-027-SD

SUBMITTER Client

COMMENTS

This laboratory request covers the following listed samples which were analyzed for the parameters indicated on the attached Analytical Result Report. All analyses were conducted using the appropriate methods as indicated on the report. This cover letter is an integral part of the final report.

Order No.	Client Sample Identification
708622	B1-0.5,B2-0.5,B3-0.5,B4-0.5
708623	B5-0.5,B6-0.5,B7-0.5,B8-0.5
708624	B9-0.5,B10-0.5,B11-0.5,B12-0.5
708625	Laboratory Method Blank

Thank you for the opportunity to be of service to your company. Please feel free to call if there are any questions regarding this report or if we can be of further service.

ASSOCIATED LABORATORIES by,

Edward S. Behare, Ph.D.
Vice President

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TESTING & CONSULTING
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Order #: 708586
Matrix: SOLID
Date Sampled: 05/03/2006
Time Sampled:
Sampled By:

Client: Advantage Environmental
Client Sample ID: B1-0.5

Analyte	Result	DF	DLR	Units	Date/Analyst	
6010B ICP Metals - All						
Arsenic	4.23	1	1.00	mg/Kg	05/09/06	KN
Cadmium	1.14	1	0.5	mg/Kg	05/09/06	KN
Lead	252	1	0.5	mg/Kg	05/09/06	KN

DLR = Detection limit for reporting purposes, ND = Not Detected below indicated detection limit, DF = Dilution Factor

Order #: 708589
Matrix: SOLID
Date Sampled: 05/03/2006
Time Sampled:
Sampled By:

Client: Advantage Environmental
Client Sample ID: B2-0.5

Analyte	Result	DF	DLR	Units	Date/Analyst	
6010B ICP Metals - All						
Arsenic	3.85	1	1.00	mg/Kg	05/09/06	KN
Cadmium	0.972	1	0.5	mg/Kg	05/09/06	KN
Lead	110	1	0.5	mg/Kg	05/09/06	KN

DLR = Detection limit for reporting purposes, ND = Not Detected below indicated detection limit, DF = Dilution Factor

Order #: 708592
Matrix: SOLID
Date Sampled: 05/03/2006
Time Sampled:
Sampled By:

Client: Advantage Environmental
Client Sample ID: B3-0.5

Analyte	Result	DF	DLR	Units	Date/Analyst	
6010B ICP Metals - All						
Arsenic	4.64	1	1.00	mg/Kg	05/09/06	KN
Cadmium	1.45	1	0.5	mg/Kg	05/09/06	KN
Lead	152	1	0.5	mg/Kg	05/09/06	KN

DLR = Detection limit for reporting purposes, ND = Not Detected below indicated detection limit, DF = Dilution Factor

Order #: 708595
Matrix: SOLID
Date Sampled: 05/03/2006
Time Sampled:
Sampled By:

Client: Advantage Environmental
Client Sample ID: B4-0.5

Analyte	Result	DF	DLR	Units	Date/Analyst
6010B ICP Metals - All					
Arsenic	2.93	1	1.00	mg/Kg	05/09/06 KN
Cadmium	1.16	1	0.5	mg/Kg	05/09/06 KN
Lead	153	1	0.5	mg/Kg	05/09/06 KN

DLR = Detection limit for reporting purposes, ND = Not Detected below indicated detection limit, DF = Dilution Factor

Order #: 708598
Matrix: SOLID
Date Sampled: 05/03/2006
Time Sampled:
Sampled By:

Client: Advantage Environmental
Client Sample ID: B5-0.5

6010B ICP Metals - All

Analyte	Result	DF	DLR	Units	Date/Analyst	
Arsenic	3.24	1	1.00	mg/Kg	05/09/06	KN
Cadmium	0.628	1	0.5	mg/Kg	05/09/06	KN
Lead	36.1	1	0.5	mg/Kg	05/09/06	KN

DLR = Detection limit for reporting purposes, ND = Not Detected below indicated detection limit, DF = Dilution Factor

Order #: 708601 **Client:** Advantage Environmental

Matrix: SOLID **Client Sample ID:** B6-0.5

Date Sampled: 05/03/2006

Time Sampled:

Sampled By:

Analyte	Result	DF	DLR	Units	Date/Analyst	
6010B ICP Metals - All						
Arsenic	90.3	1	1.00	mg/Kg	05/09/06	KN
Cadmium	1.01	1	0.50	mg/Kg	05/09/06	KN
Lead	144	1	0.50	mg/Kg	05/09/06	KN

DLR = Detection limit for reporting purposes, ND = Not Detected below indicated detection limit, DF = Dilution Factor

Order #: 708604
Matrix: SOLID
Date Sampled: 05/03/2006
Time Sampled:
Sampled By:

Client: Advantage Environmental
Client Sample ID: B7-0.5

Analyte	Result	DF	DLR	Units	Date/Analyst	
6010B ICP Metals - All						
Arsenic	5.56	1	1.00	mg/Kg	05/09/06	KN
Cadmium	1.15	1	0.50	mg/Kg	05/09/06	KN
Lead	107	1	0.50	mg/Kg	05/09/06	KN

DLR = Detection limit for reporting purposes, ND = Not Detected below indicated detection limit, DF = Dilution Factor

Order #: 708607
Matrix: SOLID
Date Sampled: 05/03/2006
Time Sampled:
Sampled By:

Client: Advantage Environmental
Client Sample ID: B8-0.5

Analyte	Result	DF	DLR	Units	Date/Analyst	
6010B ICP Metals - All						
Arsenic	3.20	1	1.00	mg/Kg	05/09/06	KN
Cadmium	ND	1	0.50	mg/Kg	05/09/06	KN
Lead	17.5	1	0.50	mg/Kg	05/09/06	KN

DLR = Detection limit for reporting purposes, ND = Not Detected below indicated detection limit, DF = Dilution Factor

Order #: 708610
Matrix: SOLID
Date Sampled: 05/03/2006
Time Sampled:
Sampled By:

Client: Advantage Environmental
Client Sample ID: B9-0.5

Analyte	Result	DF	DLR	Units	Date/Analyst	
6010B ICP Metals - All						
Arsenic	1.94	1	1.00	mg/Kg	05/09/06	KN
Cadmium	0.55	1	0.50	mg/Kg	05/09/06	KN
Lead	78.8	1	0.50	mg/Kg	05/09/06	KN

DLR = Detection limit for reporting purposes, ND = Not Detected below indicated detection limit, DF = Dilution Factor

Order #: 708613
Matrix: SOLID
Date Sampled: 05/03/2006
Time Sampled:
Sampled By:

Client: Advantage Environmental
Client Sample ID: B10-0.5

Analyte	Result	DF	DLR	Units	Date/Analyst	
6010B ICP Metals - All						
Arsenic	8.09	1	1.00	mg/Kg	05/09/06	KN
Cadmium	1.90	1	0.50	mg/Kg	05/09/06	KN
Lead	354	1	0.50	mg/Kg	05/09/06	KN

DLR = Detection limit for reporting purposes, ND = Not Detected below indicated detection limit, DF = Dilution Factor

Order #: 708616
Matrix: SOLID
Date Sampled: 05/03/2006
Time Sampled:
Sampled By:

Client: Advantage Environmental
Client Sample ID: B11-0.5

Analyte	Result	DF	DLR	Units	Date/Analyst	
6010B ICP Metals - All						
Arsenic	3.68	1	1.00	mg/Kg	05/09/06	KN
Cadmium	1.08	1	0.50	mg/Kg	05/09/06	KN
Lead	112	1	0.50	mg/Kg	05/09/06	KN

DLR = Detection limit for reporting purposes, ND = Not Detected below indicated detection limit, DF = Dilution Factor

Order #: 708619
Matrix: SOLID
Date Sampled: 05/03/2006
Time Sampled:
Sampled By:

Client: Advantage Environmental
Client Sample ID: B12-0.5

Analyte	Result	DF	DLR	Units	Date/Analyst	
6010B ICP Metals - All						
Arsenic	3.23	1	1.00	mg/Kg	05/09/06	KN
Cadmium	0.91	1	0.50	mg/Kg	05/09/06	KN
Lead	115	1	0.50	mg/Kg	05/09/06	KN

DLR = Detection limit for reporting purposes, ND = Not Detected below indicated detection limit, DF = Dilution Factor

Order #: 708622
Matrix: SOLID
Date Sampled:
Time Sampled:
Sampled By:

Client: Advantage Environmental
Client Sample ID: B1-0.5,B2-0.5,B3-0.5,B4-0.

Analyte	Result	DF	DLR	Units	Date/Analyst	
6010B ICP CAM Metals Only (W/S/W)						
Antimony	ND	1	3.00	mg/Kg	05/05/06	KN
Arsenic	3.28	1	1.00	mg/Kg	05/05/06	KN
Barium	157	1	1.00	mg/Kg	05/05/06	KN
Beryllium	ND	1	0.50	mg/Kg	05/05/06	KN
Cadmium	1.10	1	0.50	mg/Kg	05/05/06	KN
Chromium	18.6	1	1.00	mg/Kg	05/05/06	KN
Cobalt	8.12	1	0.50	mg/Kg	05/05/06	KN
Copper	55.9	1	1.00	mg/Kg	05/05/06	KN
Lead	126	1	0.50	mg/Kg	05/05/06	KN
Molybdenum	1.08	1	1.00	mg/Kg	05/05/06	KN
Nickel	15.0	1	1.50	mg/Kg	05/05/06	KN
Selenium	ND	1	1.00	mg/Kg	05/05/06	KN
Silver	ND	1	0.50	mg/Kg	05/05/06	KN
Thallium	ND	1	1.00	mg/Kg	05/05/06	KN
Vanadium	29.9	1	0.50	mg/Kg	05/05/06	KN
Zinc	264	1	5.00	mg/Kg	05/05/06	KN
7471A Mercury in Solid/Wipe						
Mercury	0.14	1	0.14	mg/Kg	05/08/06	MDJ

DLR = Detection limit for reporting purposes, ND = Not Detected below indicated detection limit, DF = Dilution Factor

Order #: 708623
Matrix: SOLID
Date Sampled:
Time Sampled:
Sampled By:

Client: Advantage Environmental
Client Sample ID: B5-0.5,B6-0.5,B7-0.5,B8-0.

Analyte	Result	DF	DLR	Units	Date/Analyst	
6010B ICP CAM Metals Only (W/S/W)						
Antimony	ND	1	3.00	mg/Kg	05/05/06	KN
Arsenic	36.6	1	1.00	mg/Kg	05/05/06	KN
Barium	154	1	1.00	mg/Kg	05/05/06	KN
Beryllium	0.58	1	0.50	mg/Kg	05/05/06	KN
Cadmium	0.77	1	0.50	mg/Kg	05/05/06	KN
Chromium	19.0	1	1.00	mg/Kg	05/05/06	KN
Cobalt	9.59	1	0.50	mg/Kg	05/05/06	KN
Copper	30.2	1	1.00	mg/Kg	05/05/06	KN
Lead	72.8	1	0.50	mg/Kg	05/05/06	KN
Molybdenum	1.10	1	1.00	mg/Kg	05/05/06	KN
Nickel	13.1	1	1.50	mg/Kg	05/05/06	KN
Selenium	ND	1	1.00	mg/Kg	05/05/06	KN
Silver	ND	1	0.50	mg/Kg	05/05/06	KN
Thallium	ND	1	1.00	mg/Kg	05/05/06	KN
Vanadium	38.9	1	0.50	mg/Kg	05/05/06	KN
Zinc	139	1	5.00	mg/Kg	05/05/06	KN
7471A Mercury in Solid/Wipe						
Mercury	0.15	1	0.14	mg/Kg	05/08/06	MDJ

DLR = Detection limit for reporting purposes, ND = Not Detected below indicated detection limit, DF = Dilution Factor

Order #: 708624 **Client:** Advantage Environmental

Matrix: SOLID **Client Sample ID:** B9-0.5,B10-0.5,B11-0.5,B12

Date Sampled:

Time Sampled:

Sampled By:

Analyte	Result	DF	DLR	Units	Date/Analyst	
6010B ICP CAM Metals Only (W/S/W)						
Antimony	ND	1	3.00	mg/Kg	05/05/06	KN
Arsenic	4.99	1	1.00	mg/Kg	05/05/06	KN
Barium	654	1	1.00	mg/Kg	05/05/06	KN
Beryllium	ND	1	0.50	mg/Kg	05/05/06	KN
Cadmium	0.83	1	0.50	mg/Kg	05/05/06	KN
Chromium	18.9	1	1.00	mg/Kg	05/05/06	KN
Cobalt	9.61	1	0.50	mg/Kg	05/05/06	KN
Copper	251	1	1.00	mg/Kg	05/05/06	KN
Lead	147	1	0.50	mg/Kg	05/05/06	KN
Molybdenum	ND	1	1.00	mg/Kg	05/05/06	KN
Nickel	13.0	1	1.50	mg/Kg	05/05/06	KN
Selenium	ND	1	1.00	mg/Kg	05/05/06	KN
Silver	ND	1	0.50	mg/Kg	05/05/06	KN
Thallium	ND	1	1.00	mg/Kg	05/05/06	KN
Vanadium	35.0	1	0.50	mg/Kg	05/05/06	KN
Zinc	488	1	5.00	mg/Kg	05/05/06	KN
7471A Mercury in Solid/Wipe						
Mercury	0.20	1	0.14	mg/Kg	05/08/06	MDJ

DLR = Detection limit for reporting purposes, ND = Not Detected below indicated detection limit, DF = Dilution Factor

Order #: 708625
Matrix: SOLID
Date Sampled:
Time Sampled:
Sampled By:

Client: Advantage Environmental
Client Sample ID: Laboratory Method Blank

Analyte	Result	DF	DLR	Units	Date/Analyst	
6010B ICP Metals - All						
Arsenic	ND	1	1.00	mg/Kg	05/05/06	KN
Cadmium	ND	1	0.50	mg/Kg	05/05/06	KN
Lead	ND	1	0.50	mg/Kg	05/05/06	KN
Antimony	ND	1	3.00	mg/Kg	05/05/06	KN
Arsenic	ND	1	1.00	mg/Kg	05/05/06	KN
Barium	ND	1	1.00	mg/Kg	05/05/06	KN
Beryllium	ND	1	0.50	mg/Kg	05/05/06	KN
Cadmium	ND	1	0.50	mg/Kg	05/05/06	KN
Chromium	ND	1	1.00	mg/Kg	05/05/06	KN
Cobalt	ND	1	0.50	mg/Kg	05/05/06	KN
Copper	ND	1	1.00	mg/Kg	05/05/06	KN
Lead	ND	1	0.50	mg/Kg	05/05/06	KN
Molybdenum	ND	1	1.00	mg/Kg	05/05/06	KN
Nickel	ND	1	1.50	mg/Kg	05/05/06	KN
Selenium	ND	1	1.00	mg/Kg	05/05/06	KN
Silver	ND	1	0.50	mg/Kg	05/05/06	KN
Thallium	ND	1	1.00	mg/Kg	05/05/06	KN
Vanadium	ND	1	0.50	mg/Kg	05/05/06	KN
Zinc	ND	1	5.00	mg/Kg	05/05/06	KN
7471A Mercury in Solid/Wipe						
Mercury	ND	1	0.14	mg/Kg	05/08/06	MDJ

DLR = Detection limit for reporting purposes, ND = Not Detected below indicated detection limit, DF = Dilution Factor

ASSOCIATED LABORATORIES
QA REPORT FORM - METHOD 6010

QC Sample: 169238-708741 H# 050506 SO1

Matrix: SOLID

Prep. Date: May 5, 2006

Analysis Date: May 5, 2006

ID#'s in Batch: LR 169238, 169239, 169192, 163393, 162674, 163233, 169214, 167029.

Reporting Units = mg/Kg

MATRIX SPIKE / MATRIX SPIKE DUPLICATE RESULT

Test	Sample Result	Spike Added	Matrix Spike	Matrix Spike Dup	%Rec MS	%Rec MSD	% RPD
As	3.05	94	88	93	90	96	6
Se	ND	94	82	86	87	91	5
Tl	ND	94	84	88	89	94	5
Pb	2.74	94	91	95	94	98	4
Sb *	5.92	94	40	41	36	37	2
Ba *	102.00	94	169	267	71	176	45
Be	ND	94	108	111	115	118	3
Cd	ND	94	92	95	98	101	3
Cr	8.64	94	92	111	89	109	19
Co	1.44	94	92	94	96	98	2
Cu	28.70	94	103	124	79	101	19
Mo	1.60	94	74	79	77	82	7
Ni	1.84	94	93	95	97	99	2
Ag	ND	47	40	41	85	87	2
V	17.30	94	106	109	94	98	3
Zn	19.10	94	95	106	81	92	11

* = Outside QC limits, due to matrix Interference
If Sample Result > 4 times Spike Added, then "NC"

% REC LIMITS = 75 - 125
RPD LIMITS = 20

ASSOCIATED LABORATORIES

LCS REPORT FORM - METHOD 6010

LCS RECOVERY / METHOD BLANK

Test	LCS Result	True Value	LCS %Rec	QC Limit %REC	MB Limit	MB Result
Ag	85	100	85	80-120	0.50	ND
As	200	200	100	80-120	1.00	ND
Ba	202	200	101	80-120	1.00	ND
Be	217	200	109	80-120	0.50	ND
Cd	207	200	104	80-120	0.50	ND
Co	209	200	105	80-120	0.50	ND
Cr	211	200	106	80-120	1.00	ND
Cu	194	200	97	80-120	1.00	ND
Mo	195	200	98	80-120	1.00	ND
Ni	209	200	105	80-120	1.50	ND
Pb	213	200	107	80-120	0.50	ND
Sb	201	200	101	80-120	3.00	ND
Se	195	200	98	80-120	1.00	ND
Tl	201	200	101	80-120	1.00	ND
V	200	200	100	80-120	0.50	ND
Zn	192	200	96	80-120	5.00	ND

ASSOCIATED LABORATORIES
QA REPORT FORM - METHOD 6010

QC Sample: 168735-706243 H# 050906 SO1

Matrix: SOLID

Prep. Date: May 9, 2006

Analysis Date: May 9, 2006

ID#'s in Batch: LR 168735, 169291, 169380, 169445, 169214, 169333

Reporting Units = mg/Kg

MATRIX SPIKE / MATRIX SPIKE DUPLICATE RESULT

Test	Sample Result	Spike Added	Matrix Spike	Matrix Spike Dup	%Rec MS	%Rec MSD	% RPD
As	1.68	96	93	90	95	92	3
Se	ND	96	78	73	81	76	7
Tl *	ND	96	75	71	78	74	5
Pb	6.86	96	94	91	91	88	3
Sb	3.52	96	88	86	88	86	2
Ba	67.70	96	151	159	87	95	5
Be	ND	96	91	92	95	96	1
Cd	ND	96	87	91	91	95	4
Cr	23.90	96	114	117	94	97	3
Co	12.40	96	96	94	87	85	2
Cu	16.80	96	102	107	89	94	5
Mo	1.77	96	86	84	88	86	2
Ni	16.10	96	99	98	86	85	1
Ag *	ND	48	41	34	85	71	18
V	51.10	96	133	139	85	92	4
Zn	47.60	96	125	130	81	86	4
Al	13,700.00	96	13,200	14,000	NC	NC	6

* = Outside QC limits, due to matrix Interference
If Sample Result > 4 times Spike Added, then "NC"

% REC LIMITS = 75 -125
RPD LIMITS = 20

ASSOCIATED LABORATORIES
LCS REPORT FORM - METHOD 6010

LCS RECOVERY / METHOD BLANK

Test	LCS Result	True Value	LCS %Rec	QC Limit %REC	MB Limit	MB Result
Ag	82	100	82	80-120	0.50	ND
Al	203	200	102	80-120	20.00	ND
As	208	200	104	80-120	1.00	ND
Ba	196	200	98	80-120	1.00	ND
Be	234	200	117	80-120	0.50	ND
Cd	209	200	105	80-120	0.50	ND
Co	211	200	106	80-120	0.50	ND
Cr	211	200	106	80-120	1.00	ND
Cu	205	200	103	80-120	1.00	ND
Mo	197	200	99	80-120	1.00	ND
Ni	211	200	106	80-120	1.50	ND
Pb	213	200	107	80-120	0.50	ND
Sb	194	200	97	80-120	3.00	ND
Se	202	200	101	80-120	1.00	ND
Tl	210	200	105	80-120	1.00	ND
V	204	200	102	80-120	0.50	ND
Zn	198	200	99	80-120	5.00	ND

ASSOCIATED LABORATORIES
QA REPORT FORM

QC Sample: LR 169214-708622

Matrix: SOIL

Prep. Date: May 08-06

Analysis Date: May 08-06

ID#'s in Batch: LR 169283, 169214, 167029

MATRIX SPIKE / MATRIX SPIKE DUPLICATE RESULT

Reporting Units = mg/Kg

Test	Method	Sample Result	Spike Added	Matrix Spike	Matrix Spike Dup	%Rec MS	%Rec MSD	RPD
MERCURY	245.5 / 7471A	0.14	0.81	0.99	0.99	105	105	0

RPD = Relative Percent Difference of Matrix Spike and Matrix Spike Duplicate
%REC-MS & MSD = Percent Recovery of Matrix Spike & Matrix Spike Duplicate

%REC LIMITS = 75-125
RPD LIMITS = 20

PREPARATION BLANK / LAB CONTROL SAMPLE RESULTS

PREP BLK	LCS				
Value	Result	True	%Rec	L.Limit	H.Limit
ND	0.85	0.82	104	80%	120%

Value = Preparation Blank Value; ND = Not-Detected
LCS Result = Lab Control Sample Result
True = True Value of LCS
L.Limit / H.Limit = LCS Control Limits

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CHAIN OF CUSTODY RECORD

Date 5/3/06 Page 1 of 4

Assigned LR# 169214

CLIENT: Advantage Environmental

ADDRESS: 820 Los Vallecitos Blvd. Ste. 210 San Marcos, CA 92069

Is this the address the final report is to be sent to? Yes ____ No ____
If "No" list mailing address in "Special Instructions" section at the bottom of this Chain of Custody.

PROJECT IDENTIFICATION/LOCATION:

PURCHASE ORDER #: 06-027 SD

SAMPLER: (Print AND Sign) Dan Wells

SAMPLE TURNAROUND TIME:

Requested Turnaround Time (CIRCLE ONE)*
Priority Charges Apply to Rush Turnaround Times
RUSH: Same Day 24 Hr (48 Hr) 72 Hr
STANDARD: Standard TAT **(5 to 10 Working Days)
Other
* Availability of Same Day/24/48/72 Hr TAT Varies Based Upon Test Method Requirements.
**Standard TAT Varies According to Analyses.

CONTACT PERSON: Dan Wells

SAMPLED BY (Circle One): (Client) Assoc. Lab Personnel

PHONE #: (760) 744-3363

FAX #: (760) 744-3383

SAMPLE CONDITION INFO - *FOR LAB USE ONLY:*
Samples Intact: Yes ____ No ____
Sample Seals Intact: Yes ____ No ____ N/A ____
Cooler Seals Intact: Yes ____ No ____ N/A ____

	SAMPLE ID	SAMPLE OR LOCATION DESCRIPTION	DATE	TIME	MATRIX (See Codes Below)	# OF CONTAINERS	TEST REQUIRED
1	B1-0.5		5/3/06		Soil		Please Composite Equal Portions of Samples: (B1-0.5, B2-0.5, B3-0.5 and B4-0.5) (B5-0.5, B6-0.5, B7-0.5, and B8-0.5) (B9-0.5, B10-0.5, B11-0.5 and B12-0.5) and analyze for Title 22 Metals (48-hr TAT).
2	B1-1.5						
3	B1-3						
4	B2-0.5						
5	B2-1.5						
6	B2-3						
7	B3-0.5						
8	B3-1.5						
9	B3-3						
10	B4-0.5						

MATRIX: GW=Ground Water DW=Drinking Water WW=Waste Water SW=Storm Water S=Solid/Soil A=Air L=Liquid F=Food (Use the codes shown here to identify the matrix above)

Relinquished by: (Print AND Sign)***	Received By: (Print AND Sign)	Date/Time:
Dan Wells		
Relinquished by: (Print AND Sign)***	Received By: (Print AND Sign)	Date/Time: 5/3/06
	[illegible]	
Relinquished by: (Print AND Sign)***	Received by Lab for Analysis: (Print AND Sign)	Date/Time: 1820

Special Instructions:
Archive remaining portions of composited samples and all other samples.

***By signing this Chain of Custody you are authorizing the analyses shown above. (Print AND Sign)

COC DISTRIBUTION:
White with report. Yellow to AL. Pink to Client's Courier.

E-5-YDC 6/10

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714/771-6900 FAX 714/538-1209

CHAIN OF CUSTODY RECORD

Date 5/3/06 Page 1 of 4

Assigned LR# _____

CLIENT: _____

ADDRESS: _____

_____

Is this the address the final report is to be sent to? Yes ___ No ___
If "No" list mailing address in "Special Instructions" section at the bottom of this Chain of Custody.

PROJECT IDENTIFICATION/LOCATION:

PURCHASE ORDER #: _____

SAMPLER: (Print AND Sign) _____

SAMPLE TURNAROUND TIME:

Requested Turnaround Time (CIRCLE ONE)*
Priority Charges Apply to Rush Turn Around Times
RUSH: Same Day 24 Hr (48 Hr) 72 Hr
STANDARD: Standard TAT **(5 to 10 Working Days)
Other _____
* Availability of Same Day/24/48/72 Hr TAT Varies Based Upon Test Method Requirements.
**Standard TAT Varies According to Analyses.

CONTACT PERSON: _____

SAMPLED BY (Circle One): Client Assoc. Lab Personnel

PHONE #: ( ) _____

FAX #: ( ) _____

SAMPLE CONDITION INFO - *FOR LAB USE ONLY:*
Samples Intact: Yes ___ No ___
Sample Seals Intact: Yes ___ No ___ N/A ___
Cooler Seals Intact: Yes ___ No ___ N/A ___

	SAMPLE ID	SAMPLE OR LOCATION DESCRIPTION	DATE	TIME	MATRIX (See Codes Below)	# OF CONTAINERS	TEST REQUIRED
1	B4-1.5		5/3/06		Soil		
2	B4-3						See Page 1
3	B5-0.5						
4	B5-1.5						
5	B5-3						
6	B6-0.5						
7	B6-1.5						
8	B6-3						
9	B7-0.5						
10	B7-1.5						

MATRIX: GW=Ground Water DW=Drinking Water WW=Waste Water SW=Storm Water S=Solid/Soil A=Air L=Liquid F=Food (Use the codes shown here to identify the matrix above)

Relinquished by: (Print AND Sign)*** Dan Wei	Received By: (Print AND Sign) [illegible]	Date/Time: 5/3/06
Relinquished by: (Print AND Sign)***	Received By: (Print AND Sign)	Date/Time: 1810
Relinquished by: (Print AND Sign)***	Received by Lab for Analysis: (Print AND Sign)	Date/Time:

Special Instructions:

***By signing this Chain of Custody you are authorizing the analyses shown above. _____ (Print AND Sign)

COC DISTRIBUTION:
White with report. Yellow to AL. Pink to Client's Courier.

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CHAIN OF CUSTODY RECORD

Date 5/2/06 Page 3 of 4

Assigned LR# _____

CLIENT: _____

ADDRESS: _____

Is this the address the final report is to be sent to? Yes ___ No ___
If "No" list mailing address in "Special Instructions" section at the bottom of this Chain of Custody.

See Page 1

CONTACT PERSON: _____

SAMPLED BY (Circle One): Client Assoc. Lab Personnel

PROJECT IDENTIFICATION/LOCATION:

PURCHASE ORDER #: _____

SAMPLER: (Print AND Sign) _____

PHONE #: ( ) _____

FAX #: ( ) _____

SAMPLE TURNAROUND TIME:

Requested Turnaround Time (CIRCLE ONE)*
Priority Charges Apply to Rush Turn Around Times
RUSH: Same Day 24 Hr (48 Hr) 72 Hr
STANDARD: Standard TAT **(5 to 10 Working Days)
Other _____
* Availability of Same Day/24/48/72 Hr TAT Varies Based Upon Test Method Requirements.
**Standard TAT Varies According to Analyses.

SAMPLE CONDITION INFO - *FOR LAB USE ONLY:*
Samples Intact: Yes ___ No ___
Sample Seals Intact: Yes ___ No ___ N/A ___
Cooler Seals Intact: Yes ___ No ___ N/A ___

	SAMPLE ID	SAMPLE OR LOCATION DESCRIPTION	DATE	TIME	MATRIX (See Codes Below)	# OF CONTAINERS	TEST REQUIRED
1	B7-3		5/3/06	✓	Soil	1	See Page 1
2	B8-0.5			✓		1	
3	B8-1.5			✓		1	
4	B8-3			✓		1	
5	B9-0.5			✓		1	
6	B9-1.5			✓		1	
7	B9-3			✓		1	
8	B10-0.5			✓		1	
9	B10-1.5			✓		1	
10	B10-3			✓		1	

MATRIX: GW=Ground Water DW=Drinking Water WW=Waste Water SW=Storm Water S=Solid/Soil A=Air L=Liquid F=Food (Use the codes shown here to identify the matrix above)

Relinquished by: (Print AND Sign)***	Received By: (Print AND Sign)	Date/Time:
Daniel Daniels		5/3/06 1800
Relinquished by: (Print AND Sign)***	Received By: (Print AND Sign)	Date/Time:
Relinquished by: (Print AND Sign)***	Received by Lab for Analysis: (Print AND Sign)	Date/Time:

***By signing this Chain of Custody you are authorizing the analyses shown above. _____ (Print AND Sign)

Special Instructions:

COC DISTRIBUTION:
White with report. Yellow to AL. Pink to Client's Courier.

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714/771-6900 FAX 714/538-1209

CHAIN OF CUSTODY RECORD

Date 5/3/06 Page 4 of 4

Assigned LR# _____

CLIENT: _____

ADDRESS: _____

Is this the address the final report is to be sent to? Yes ___ No ___
If "No" list mailing address in "Special Instructions" section at the bottom of this Chain of Custody.

CONTACT PERSON: _____

SAMPLED BY (Circle One): Client Assoc. Lab Personnel

PROJECT IDENTIFICATION/LOCATION:

PURCHASE ORDER #: _____

SAMPLER: (Print AND Sign) _____

PHONE #: ( ) _____

FAX #: ( ) _____

SAMPLE TURNAROUND TIME:

Requested Turnaround Time (CIRCLE ONE)*
Priority Charges Apply to Rush Turn Around Times
RUSH: Same Day 24 Hr (48 Hr) 72 Hr
STANDARD: Standard TAT **~~(5 to 10~~ Working Days)
Other _____
* Availability of Same Day/24/48/72 Hr TAT Varies Based Upon Test Method Requirements.
**Standard TAT Varies According to Analyses.

SAMPLE CONDITION INFO - *FOR LAB USE ONLY:*
Samples Intact: Yes ___ No ___
Sample Seals Intact: Yes ___ No ___ N/A ___
Cooler Seals Intact: Yes ___ No ___ N/A ___

	SAMPLE ID	SAMPLE OR LOCATION DESCRIPTION	DATE	TIME	MATRIX (See Codes Below)	# OF CONTAINERS	TEST REQUIRED
1	~~B~~ B1-0.5		5/3/06	✓	Soil	1	
2	B1-1.5			✓			See Page 1
3	B1-3			✓			
4	B2-0.5			✓			
5	B2-1.5			✓			
6	B2-3			✓			
7							
8							
9							
10							

MATRIX: GW=Ground Water DW=Drinking Water WW=Waste Water SW=Storm Water S=Solid/Soil A=Air L=Liquid F=Food (Use the codes shown here to identify the matrix above)

Relinquished by: (Print AND Sign)*** [signature]	Received By: (Print AND Sign) [signature]	Date/Time: 5/3/06 18:06
Relinquished by: (Print AND Sign)***	Received By: (Print AND Sign)	Date/Time:
Relinquished by: (Print AND Sign)***	Received by Lab for Analysis: (Print AND Sign)	Date/Time:

Special Instructions:

***By signing this Chain of Custody you are authorizing the analyses shown above. _____ (Print AND Sign)

COC DISTRIBUTION:
White with report. Yellow to AL. Pink to Client's Courier.

APPENDIX I

HEXAVALENT CHROMIUM ANALYSIS, NOVEMBER 3, 2006

PSI Information To Build On
Engineering • Consulting • Testing

November 3, 2006

Mr. Larry Meyer
Alameda Holdings, LLC
%
Colliers International
5801 East Slauson Avenue, Suite 160
Commerce, California 90040

Phone: (323) 278-3130 Fax: (323) 278-3030

RE: Hexavalent Chromium Analysis
Site Investigation, Ken-1, Los Angeles, California
PSI Project Number 559-6G0017

Dear Mr. Meyer:

PSI is pleased to present the findings of our hexavalent chromium analysis for the Ken-1 Project site investigation. PSI originally performed a Limited Phase II Site Assessment of the Subject Property in October 2006. During this assessment, concentrations of total chromium were detected in excess of the residential California Human Health Screening Level (CHHSL) for hexavalent chromium (17 mg/kg) at 21 locations at depths ranging from 1 foot to 10 feet below ground surface (bgs). Chromium naturally exists in two forms: trivalent and hexavalent chromium. The CHHSL for trivalent chromium is significantly higher (100,000 mg/kg) than hexavalent chromium. Speciation of total chromium detected in the collected samples was not initially conducted as part of this assessment.

Persuant an authorization email from Mr. Ken Coward, of Colliers International, dated October 20, 2006, PSI performed chromium speciation of the 21 samples that contained total concentrations of chromium in excess of the residential CHHSL for hexavalent chromium. Chromium speciation was performed by Sunstar Laboratory, Inc. located in Tustin, California using Environmental Protection Agency (EPA) method 7196A.

The results of this analysis revealed concentrations of hexavalent chromium are below the laboratory detection limit of 1 mg/kg in all 21 analyzed samples. As a result, it does not appear that any of the total chromium concentrations are in excess of either the CHHSLs or EPA Region IX preliminary remediation goals (PRGs) for residential and

industrial land uses. Therefore, it does not appear that the total chromium concentrations present in the subsurface soil at the subject property would represent grounds for land use restriction.

If PSI can be of additional service or if you have any questions, please call us at (562) 597-3977.

Respectfully submitted,
PROFESSIONAL SERVICE INDUSTRIES, INC.

Eric Fraske
Department Manager

Valerie Marshall
Principal Consultant

Attachments: Sample Location Map
Table 1: Concentrations of Hexavalent Chromium in Selected Soil Samples
Laboratory Analytical Report

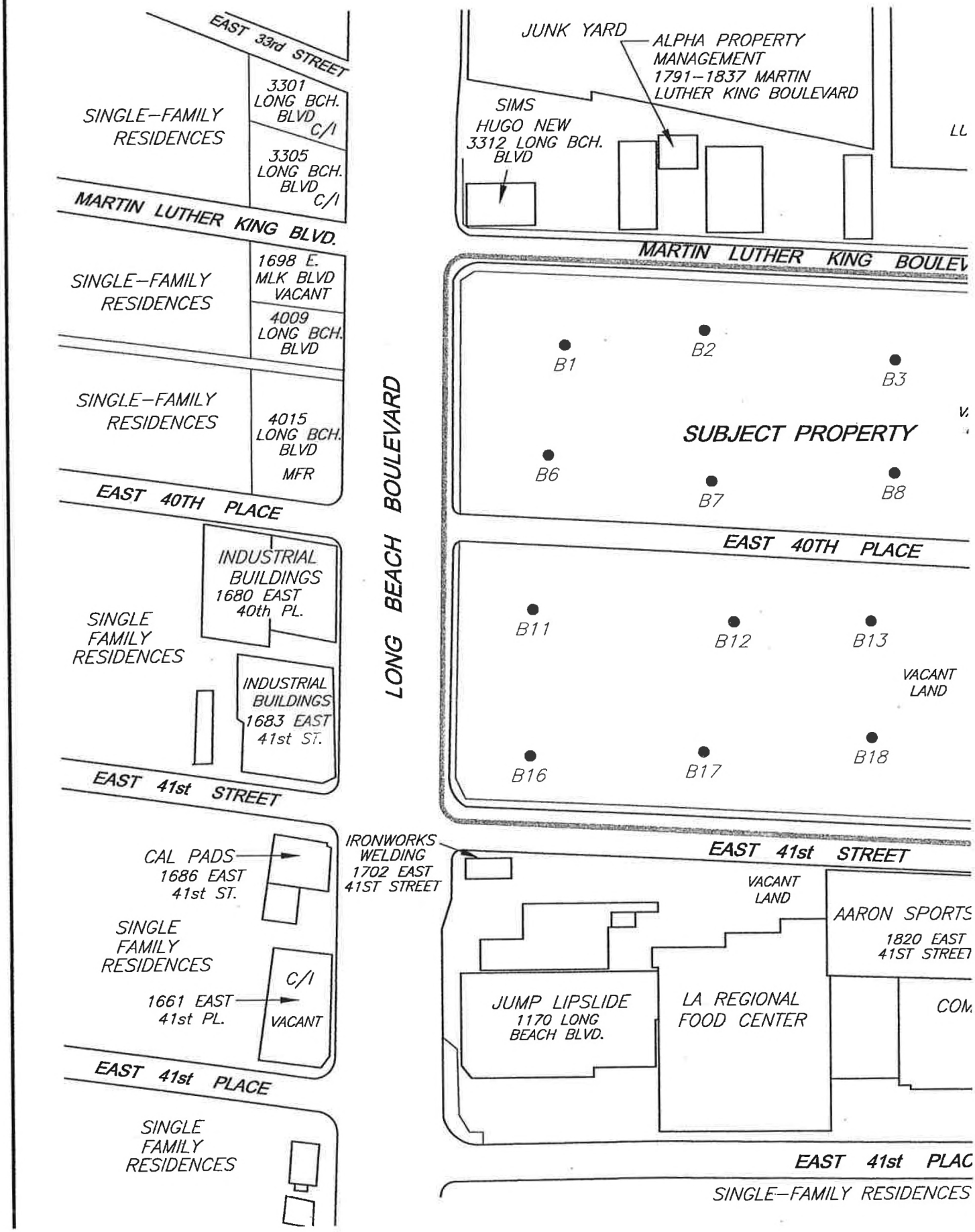

EAST 33rd STREET
SINGLE–FAMILY RESIDENCES
3301 LONG BCH. BLVD C/I
3305 LONG BCH. BLVD C/I
MARTIN LUTHER KING BLVD.
SINGLE–FAMILY RESIDENCES
1698 E. MLK BLVD VACANT
4009 LONG BCH. BLVD
SINGLE–FAMILY RESIDENCES
4015 LONG BCH. BLVD MFR
EAST 40TH PLACE
INDUSTRIAL BUILDINGS 1680 EAST 40th PL.
SINGLE FAMILY RESIDENCES
INDUSTRIAL BUILDINGS 1683 EAST 41st ST.
EAST 41st STREET
CAL PADS 1686 EAST 41st ST.
SINGLE FAMILY RESIDENCES
1661 EAST 41st PL.
C/I VACANT
EAST 41st PLACE
SINGLE FAMILY RESIDENCES
LONG BEACH BOULEVARD
JUNK YARD
ALPHA PROPERTY MANAGEMENT 1791–1837 MARTIN LUTHER KING BOULEVARD
SIMS HUGO NEW 3312 LONG BCH. BLVD
MARTIN LUTHER KING BOULEV
B1
B2
B3
SUBJECT PROPERTY
B6
B7
B8
EAST 40TH PLACE
B11
B12
B13
VACANT LAND
B16
B17
B18
IRONWORKS WELDING 1702 EAST 41ST STREET
EAST 41st STREET
VACANT LAND
AARON SPORTS
1820 EAST 41ST STREET
JUMP LIPSLIDE 1170 LONG BEACH BLVD.
LA REGIONAL FOOD CENTER
EAST 41st PLAC
SINGLE–FAMILY RESIDENCES

TABLE 1: CONCENTRATIONS OF HEXAVALENT CHROMIUM IN SELECTED SOIL SAMPLES

TOTAL CHROMIUM (EPA METHOD 6010)
HEXAVALENT CHROMIUM (EPA METHOD 7196A)

Boring Location	Depth (ft.)	Total Chromium	Hexavalent Chromium
B1	1	30	<1.0
B2	5	17	<1.0
B3	1	18	<1.0
B3	5	23	<1.0
B6	1	23	<1.0
B6	5	17	<1.0
B6	10	18	<1.0
B9	1	22	<1.0
B9	5	25	<1.0
B10	1	26	<1.0
B11	1	18	<1.0
B11	5	22	<1.0
B12	1	18	<1.0
B12	5	24	<1.0
B13	1	22	<1.0
B13	5	26	<1.0
B13	10	17	<1.0
B14	1	18	<1.0
B16	1	22	<1.0
B16	5	18	<1.0
B19	1	27	<1.0
California Human Health Screening Levels for Residential Soil		**100000**	**17**
EPA Region IV Preliminary Remediation Goal for Residential Soil		**210**	**30**
California Human Health Screening Levels for Industrial Soil		**100000**	**37**
EPA Region IV Preliminary Remediation Goal for Industrial Soil		**450**	**64**
Soluble Threshold Level Concentration according to Title 22 in California (mg/l)		**5**	**5**
10X Soluble Threshold Level Concentration according to Title 22 in California		**50**	**50**
Total Threshold Level Concentration according to Title 22 in California		**2500**	**NL**

Notes:
All values are shown in milligrams per Kilogram (mg/Kg)

NA	Not Listed
<1.0	Concentration is below laboratory detection limit
30	Concentration exceeds the Title 22 Soluble Threshold Level Concentration (STLC)

27 October 2006

Eric Fraske
PSI - Long Beach
3960 Gilman Street
Long Beach, CA 90815
RE: KEN-1

Enclosed are the results of analyses for samples received by the laboratory on 09/22/06 17:00. If you have any questions concerning this report, please feel free to contact me.

Sincerely,

John Shepler
Laboratory Director

PSI - Long Beach	Project: KEN-1	
3960 Gilman Street	Project Number: 559-6G017	**Reported:**
Long Beach CA, 90815	Project Manager: Eric Fraske	10/27/06 15:29

ANALYTICAL REPORT FOR SAMPLES

Sample ID	Laboratory ID	Matrix	Date Sampled	Date Received
B14-1	T601317-01	Soil	09/21/06 10:12	09/22/06 17:00
B13-1	T601317-05	Soil	09/21/06 10:43	09/22/06 17:00
B13-5	T601317-06	Soil	09/21/06 10:45	09/22/06 17:00
B13-10	T601317-07	Soil	09/21/06 10:48	09/22/06 17:00
B12-1	T601317-13	Soil	09/21/06 11:37	09/22/06 17:00
B12-5	T601317-14	Soil	09/21/06 11:38	09/22/06 17:00
B11-1	T601317-21	Soil	09/21/06 13:36	09/22/06 17:00
B11-5	T601317-22	Soil	09/21/06 13:39	09/22/06 17:00
B16-1	T601317-25	Soil	09/21/06 14:01	09/22/06 17:00
B16-5	T601317-26	Soil	09/21/06 14:04	09/22/06 17:00
B19-1	T601317-37	Soil	09/21/06 14:51	09/22/06 17:00
B6-1	T601317-42	Soil	09/22/06 07:59	09/22/06 17:00
B6-5	T601317-43	Soil	09/22/06 08:03	09/22/06 17:00
B6-10	T601317-44	Soil	09/22/06 08:06	09/22/06 17:00
B9-1	T601317-46	Soil	09/21/06 08:48	09/22/06 17:00
B9-5	T601317-47	Soil	09/21/06 08:51	09/22/06 17:00
B10-1	T601317-50	Soil	09/21/06 09:18	09/22/06 17:00
B1-1	T601317-58	Soil	09/22/06 08:18	09/22/06 17:00
B2-5	T601317-62	Soil	09/22/06 08:47	09/22/06 17:00
B3-1	T601317-65	Soil	09/22/06 09:05	09/22/06 17:00
B3-5	T601317-66	Soil	09/22/06 09:08	09/22/06 17:00

PSI - Long Beach	Project: KEN-1	
3960 Gilman Street	Project Number: 559-6G017	**Reported:**
Long Beach CA, 90815	Project Manager: Eric Fraske	10/27/06 15:29

B14-1
T601317-01 (Soil)

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Not
SunStar Laboratories, Inc.									
Conventional Chemistry Parameters by APHA/EPA Methods									
Hexavalent Chromium	ND	1.0	mg/kg	1	6102511	10/25/06	10/26/06	EPA 7196A	

The results in this report apply to the samples analyzed in accordance with the chain o custody document. This analytical report must be reproduced in its entirety.

John J. Kot

PSI - Long Beach	Project: KEN-1	
3960 Gilman Street	Project Number: 559-6G017	**Reported:**
Long Beach CA, 90815	Project Manager: Eric Fraske	10/27/06 15:29

B13-1
T601317-05 (Soil)

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Not
SunStar Laboratories, Inc.									
Conventional Chemistry Parameters by APHA/EPA Methods									
Hexavalent Chromium	ND	1.0	mg/kg	1	6102511	10/25/06	10/26/06	EPA 7196A	

The results in this report apply to the samples analyzed in accordance with the chain o custody document. This analytical report must be reproduced in its entirety.

PSI - Long Beach	Project: KEN-1	
3960 Gilman Street	Project Number: 559-6G017	**Reported:**
Long Beach CA, 90815	Project Manager: Eric Fraske	10/27/06 15:29

B13-5
T601317-06 (Soil)

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Not
SunStar Laboratories, Inc.									
Conventional Chemistry Parameters by APHA/EPA Methods									
Hexavalent Chromium	ND	1.0	mg/kg	1	6102511	10/25/06	10/26/06	EPA 7196A	

The results in this report apply to the samples analyzed in accordance with the chain o custody document. This analytical report must be reproduced in its entirety.

John J. Hyl

PSI - Long Beach	Project: KEN-1	
3960 Gilman Street	Project Number: 559-6G017	**Reported:**
Long Beach CA, 90815	Project Manager: Eric Fraske	10/27/06 15:29

B13-10
T601317-07 (Soil)

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Not
SunStar Laboratories, Inc.									
Conventional Chemistry Parameters by APHA/EPA Methods									
Hexavalent Chromium	ND	1.0	mg/kg	1	6102511	10/25/06	10/26/06	EPA 7196A	

The results in this report apply to the samples analyzed in accordance with the chain o custody document. This analytical report must be reproduced in its entirety.

John J. Kot

PSI - Long Beach	Project: KEN-1	
3960 Gilman Street	Project Number: 559-6G017	**Reported:**
Long Beach CA, 90815	Project Manager: Eric Fraske	10/27/06 15:29

B12-1
T601317-13 (Soil)

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Not
SunStar Laboratories, Inc.									
Conventional Chemistry Parameters by APHA/EPA Methods									
Hexavalent Chromium	ND	1.0	mg/kg	1	6102511	10/25/06	10/26/06	EPA 7196A	

The results in this report apply to the samples analyzed in accordance with the chain o custody document. This analytical report must be reproduced in its entirety.

John J. Kot

PSI - Long Beach	Project: KEN-1	
3960 Gilman Street	Project Number: 559-6G017	**Reported:**
Long Beach CA, 90815	Project Manager: Eric Fraske	10/27/06 15:29

B12-5
T601317-14 (Soil)

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Not
SunStar Laboratories, Inc.									
Conventional Chemistry Parameters by APHA/EPA Methods									
Hexavalent Chromium	ND	1.0	mg/kg	1	6102511	10/25/06	10/26/06	EPA 7196A	

The results in this report apply to the samples analyzed in accordance with the chain o custody document. This analytical report must be reproduced in its entirety.

John J. Kot

PSI - Long Beach	Project: KEN-1	
3960 Gilman Street	Project Number: 559-6G017	**Reported:**
Long Beach CA, 90815	Project Manager: Eric Fraske	10/27/06 15:29

B11-1
T601317-21 (Soil)

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Not
SunStar Laboratories, Inc.									
Conventional Chemistry Parameters by APHA/EPA Methods									
Hexavalent Chromium	ND	1.0	mg/kg	1	6102511	10/25/06	10/26/06	EPA 7196A	

The results in this report apply to the samples analyzed in accordance with the chain o custody document. This analytical report must be reproduced in its entirety.

PSI - Long Beach	Project: KEN-1	
3960 Gilman Street	Project Number: 559-6G017	**Reported:**
Long Beach CA, 90815	Project Manager: Eric Fraske	10/27/06 15:29

B11-5
T601317-22 (Soil)

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Not
SunStar Laboratories, Inc.									
Conventional Chemistry Parameters by APHA/EPA Methods									
Hexavalent Chromium	ND	1.0	mg/kg	1	6102511	10/25/06	10/26/06	EPA 7196A	

PSI - Long Beach	Project: KEN-1	
3960 Gilman Street	Project Number: 559-6G017	**Reported:**
Long Beach CA, 90815	Project Manager: Eric Fraske	10/27/06 15:29

B16-1
T601317-25 (Soil)

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Not
SunStar Laboratories, Inc.									
Conventional Chemistry Parameters by APHA/EPA Methods									
Hexavalent Chromium	ND	1.0	mg/kg	1	6102511	10/25/06	10/26/06	EPA 7196A	

The results in this report apply to the samples analyzed in accordance with the chain o custody document. This analytical report must be reproduced in its entirety.

PSI - Long Beach	Project: KEN-1	
3960 Gilman Street	Project Number: 559-6G017	**Reported:**
Long Beach CA, 90815	Project Manager: Eric Fraske	10/27/06 15:29

B16-5
T601317-26 (Soil)

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Not
SunStar Laboratories, Inc.									
Conventional Chemistry Parameters by APHA/EPA Methods									
Hexavalent Chromium	ND	1.0	mg/kg	1	6102511	10/25/06	10/26/06	EPA 7196A	

The results in this report apply to the samples analyzed in accordance with the chain o custody document. This analytical report must be reproduced in its entirety.

John J. Light

PSI - Long Beach	Project: KEN-1	
3960 Gilman Street	Project Number: 559-6G017	**Reported:**
Long Beach CA, 90815	Project Manager: Eric Fraske	10/27/06 15:29

B19-1
T601317-37 (Soil)

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Not
SunStar Laboratories, Inc.									
Conventional Chemistry Parameters by APHA/EPA Methods									
Hexavalent Chromium	ND	1.0	mg/kg	1	6102511	10/25/06	10/26/06	EPA 7196A	

The results in this report apply to the samples analyzed in accordance with the chain o custody document. This analytical report must be reproduced in its entirety.

PSI - Long Beach	Project: KEN-1	
3960 Gilman Street	Project Number: 559-6G017	**Reported:**
Long Beach CA, 90815	Project Manager: Eric Fraske	10/27/06 15:29

B6-1
T601317-42 (Soil)

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Not
SunStar Laboratories, Inc.									
Conventional Chemistry Parameters by APHA/EPA Methods									
Hexavalent Chromium	ND	1.0	mg/kg	1	6102511	10/25/06	10/26/06	EPA 7196A	

The results in this report apply to the samples analyzed in accordance with the chain o custody document. This analytical report must be reproduced in its entirety.

PSI - Long Beach	Project: KEN-1	
3960 Gilman Street	Project Number: 559-6G017	**Reported:**
Long Beach CA, 90815	Project Manager: Eric Fraske	10/27/06 15:29

B6-5
T601317-43 (Soil)

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Not
SunStar Laboratories, Inc.									
Conventional Chemistry Parameters by APHA/EPA Methods									
Hexavalent Chromium	ND	1.0	mg/kg	1	6102511	10/25/06	10/26/06	EPA 7196A	

The results in this report apply to the samples analyzed in accordance with the chain o custody document. This analytical report must be reproduced in its entirety.

John J. Light

PSI - Long Beach	Project: KEN-1	
3960 Gilman Street	Project Number: 559-6G017	**Reported:**
Long Beach CA, 90815	Project Manager: Eric Fraske	10/27/06 15:29

B6-10
T601317-44 (Soil)

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Not
SunStar Laboratories, Inc.									
Conventional Chemistry Parameters by APHA/EPA Methods									
Hexavalent Chromium	ND	1.0	mg/kg	1	6102511	10/25/06	10/26/06	EPA 7196A	

The results in this report apply to the samples analyzed in accordance with the chain o custody document. This analytical report must be reproduced in its entirety.

PSI - Long Beach	Project: KEN-1	
3960 Gilman Street	Project Number: 559-6G017	**Reported:**
Long Beach CA, 90815	Project Manager: Eric Fraske	10/27/06 15:29

B9-1
T601317-46 (Soil)

SunStar Laboratories, Inc.

Conventional Chemistry Parameters by APHA/EPA Methods

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Not
Hexavalent Chromium	ND	1.0	mg/kg	1	6102511	10/25/06	10/26/06	EPA 7196A	

The results in this report apply to the samples analyzed in accordance with the chain o custody document. This analytical report must be reproduced in its entirety.

PSI - Long Beach	Project: KEN-1	
3960 Gilman Street	Project Number: 559-6G017	**Reported:**
Long Beach CA, 90815	Project Manager: Eric Fraske	10/27/06 15:29

B9-5
T601317-47 (Soil)

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Not
SunStar Laboratories, Inc.									
Conventional Chemistry Parameters by APHA/EPA Methods									
Hexavalent Chromium	ND	1.0	mg/kg	1	6102511	10/25/06	10/26/06	EPA 7196A	

PSI - Long Beach	Project: KEN-1	
3960 Gilman Street	Project Number: 559-6G017	**Reported:**
Long Beach CA, 90815	Project Manager: Eric Fraske	10/27/06 15:29

B10-1
T601317-50 (Soil)

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Not
SunStar Laboratories, Inc.									
Conventional Chemistry Parameters by APHA/EPA Methods									
Hexavalent Chromium	ND	1.0	mg/kg	1	6102511	10/25/06	10/26/06	EPA 7196A	

The results in this report apply to the samples analyzed in accordance with the chain o custody document. This analytical report must be reproduced in its entirety.

PSI - Long Beach	Project: KEN-1	
3960 Gilman Street	Project Number: 559-6G017	**Reported:**
Long Beach CA, 90815	Project Manager: Eric Fraske	10/27/06 15:29

B1-1
T601317-58 (Soil)

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Not
SunStar Laboratories, Inc.									
Conventional Chemistry Parameters by APHA/EPA Methods									
Hexavalent Chromium	ND	1.0	mg/kg	1	6102511	10/25/06	10/26/06	EPA 7196A	

PSI - Long Beach	Project: KEN-1	
3960 Gilman Street	Project Number: 559-6G017	**Reported:**
Long Beach CA, 90815	Project Manager: Eric Fraske	10/27/06 15:29

B2-5

T601317-62 (Soil)

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Not
SunStar Laboratories, Inc.									
Conventional Chemistry Parameters by APHA/EPA Methods									
Hexavalent Chromium	ND	1.0	mg/kg	1	6102511	10/25/06	10/26/06	EPA 7196A	

PSI - Long Beach	Project: KEN-1	
3960 Gilman Street	Project Number: 559-6G017	**Reported:**
Long Beach CA, 90815	Project Manager: Eric Fraske	10/27/06 15:29

B3-1

T601317-65 (Soil)

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Not
SunStar Laboratories, Inc.									
Conventional Chemistry Parameters by APHA/EPA Methods									
Hexavalent Chromium	ND	1.0	mg/kg	1	6102511	10/25/06	10/26/06	EPA 7196A	

SunStar Laboratories, Inc.

The results in this report apply to the samples analyzed in accordance with the chain o custody document. This analytical report must be reproduced in its entirety.

PSI - Long Beach	Project: KEN-1	
3960 Gilman Street	Project Number: 559-6G017	**Reported:**
Long Beach CA, 90815	Project Manager: Eric Fraske	10/27/06 15:29

B3-5
T601317-66 (Soil)

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Not
SunStar Laboratories, Inc.									
Conventional Chemistry Parameters by APHA/EPA Methods									
Hexavalent Chromium	ND	1.0	mg/kg	1	6102512	10/25/06	10/26/06	EPA 7196A	

The results in this report apply to the samples analyzed in accordance with the chain o custody document. This analytical report must be reproduced in its entirety.

John J. Hyl

PSI - Long Beach	Project: KEN-1	
3960 Gilman Street	Project Number: 559-6G017	**Reported:**
Long Beach CA, 90815	Project Manager: Eric Fraske	10/27/06 15:29

Conventional Chemistry Parameters by APHA/EPA Methods - Quality Control

SunStar Laboratories, Inc.

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Batch 6102511 - General Preparation										
Blank (6102511-BLK1)				Prepared: 10/25/06 Analyzed: 10/26/06						
Hexavalent Chromium	ND	1.0	mg/kg							
LCS (6102511-BS1)				Prepared: 10/25/06 Analyzed: 10/26/06						
Hexavalent Chromium	10.6	1.0	mg/kg	10.0		106	75-125			
Matrix Spike (6102511-MS1)		Source: T601317-01		Prepared: 10/25/06 Analyzed: 10/26/06						
Hexavalent Chromium	7.20	1.0	mg/kg	10.0	ND	72.0	75-125			QM-4
Matrix Spike Dup (6102511-MSD1)		Source: T601317-01		Prepared: 10/25/06 Analyzed: 10/26/06						
Hexavalent Chromium	6.60	1.0	mg/kg	10.0	ND	66.0	75-125	8.70	20	QM-4
Batch 6102512 - General Preparation										
Blank (6102512-BLK1)				Prepared: 10/25/06 Analyzed: 10/26/06						
Hexavalent Chromium	ND	1.0	mg/kg							
LCS (6102512-BS1)				Prepared: 10/25/06 Analyzed: 10/26/06						
Hexavalent Chromium	10.5	1.0	mg/kg	10.0		105	75-125			
Matrix Spike (6102512-MS1)		Source: T601317-66		Prepared: 10/25/06 Analyzed: 10/26/06						
Hexavalent Chromium	11.4	1.0	mg/kg	10.0	ND	114	75-125			
Matrix Spike Dup (6102512-MSD1)		Source: T601317-66		Prepared: 10/25/06 Analyzed: 10/26/06						
Hexavalent Chromium	10.2	1.0	mg/kg	10.0	ND	102	75-125	11.1	20	

PSI - Long Beach	Project: KEN-1	
3960 Gilman Street	Project Number: 559-6G017	**Reported:**
Long Beach CA, 90815	Project Manager: Eric Fraske	10/27/06 15:29

Notes and Definitions

QM-07	The spike recovery was outside acceptance limits for the MS and/or MSD. The batch was accepted based on acceptable LCS recovery.
DET	Analyte DETECTED
ND	Analyte NOT DETECTED at or above the reporting limit
NR	Not Reported
dry	Sample results reported on a dry weight basis
RPD	Relative Percent Difference

APPENDIX J

PRELIMINARY RISK ASSESSMENT, MAY 31, 2007

PRELIMINARY RISK ASSESSMENT

THE PROPOSED 41ST AND ALAMEDA DEVELOPMENT
THE NORTHEAST CORNER OF EAST 41ST STREET
AND LONG BEACH BOULEVARD
LOS ANGELES, CALIFORNIA 90058

Prepared for

ROBERT WARD & ASSOCIATES, INC.
253 MARKET STREET
VENICE, CALIFORNIA 90291

Prepared by

Professional Service Industries, Inc.
3960 Gilman Street
Long Beach, California 90815
Telephone (562) 597-3977

PSI PROJECT NO. 559-7G011

MAY 31, 2007

Eric Fraske
Project Manager

Nick Norocea P.E.
Principal Consultant

TABLE OF CONTENTS

TABLE OF CONTENTS I
STATEMENT OF LIMITATIONS AND PROFESSIONAL CERTIFICATION II
INTRODUCTION 3
BACKGROUND 4
RISK ASSESSEMENT APPROACH 5
CARCINOGENIC RISK THRESHOLD COMPARISON 6
TARGET RISK PRG 6
RECEPTORS & EXPOSURE PATHWAYS 7
INGESTION AND DERMAL EXPOSURES 7
FUGITIVE DUST 8
RESULTS 9
CONCLUSIONS 10
9.0 REFERENCES 11

LIST OF FIGURES

FIGURE 1: PROJECT LOCATION MAP
FIGURE 2: SAMPLE LOCATION MAP

LIST OF TABLES

TABLE 1: CARCINOGENIC RISK THRESHOLD COMPARISON
TABLE 2: CALCULATION OF SCREENING LEVEL FOR COMBINED SUBCHRONIC INGESTION AND DERMAL ABSORPTION EXPOSURE TO CARCINOGENIC CONTAMINANTS IN SOIL (CONSTRUCTION WORKER SCENARIO)
TABLE 3: CALCULATION OF SCREENING LEVEL FOR COMBINED SUBCHRONIC INHALATION OF CARCINOGENIC FUGITIVE DUSTS (CONSTRUCTION WORKER SCENARIO)
TABLE 4: CALCULATION OF SCREENING LEVEL FOR COMBINED SUBCHRONIC INHALATION OF CARCINOGENIC FUGITIVE DUSTS (OFF-SITE RESIDENT SCENARIO)
TABLE 5 EXPOSURE PATHWAY SSLS

APPENDIX

APPENDIX A – ASSUMPTIONS
APPENDIX B – SOIL MANAGEMENT PLAN

STATEMENT OF LIMITATIONS AND PROFESSIONAL CERTIFICATION

The information provided in this Preliminary Risk Assessment prepared by Professional Service Industries, Inc. (PSI), is intended exclusively for Robert Ward and Associates as it pertains to the proposed 41st and Alameda Development in Los Angeles, California. It is not provided for the benefit or use of any third party. PSI does not and cannot warrant that the plan provided herein will eliminate exposure pathways or prevent impact to human health or the environment. All work conducted on the site will be done in accordance with local, state, and federal laws and regulations.

The professional services provided have been performed in accordance with practices generally accepted by other appropriate environmental professionals, geologists, hydrologists, hydrogeologists, engineers, and environmental scientists practicing in this field. No other warranty, either expressed or implied, is made. PSI is not an insurer and makes no guarantee or warranty that the services supplied will avert or mitigate occurrences, or the consequences of occurrences, that the services are designed to prevent or ameliorate. As with all surface and subsurface soil investigations, there is no guarantee that the work conducted has identified all sources or locations of hazardous substances or chemicals that may be present in the proposed 41st and Alameda Development. This report is issued with the understanding that Robert Ward and Associates are responsible for ensuring that the information contained in this report is brought to the attention of the appropriate regulatory agency and that all work is done in accordance with applicable local, state, and federal laws and regulations.

_____

Eric Fraske
Project Manager

_____

Nick Norocea, P.E.
Senior Engineer
Principal Consultant

INTRODUCTION

The objective of this preliminary risk assessment is to compare the concentrations of arsenic found in soils at the 41st and Alameda development with published Preliminary Remediation Goals (PRGs), California Human Health Screening Levels (CHHSLs) and calculated Soil Screening Levels (SSLs).

The protocol used for the human health risk screening was in general accordance with U.S. Environmental Protection Agency Risk Assessment Guidance for Superfund: (EPA RAGS, Volume 1, Part A and B), U.S. Environmental Protection Agency (EPA) Region 9 guidance, and current industry standards. The general scope of the screening included:

- Examination of the physical characteristics of the site, including surface features, meteorology, demography current and future land use.
- Estimating cancer risk factors for the maximum concentrations of arsenic.
- Identifying Human Receptors that may be exposed to arsenic.
- Identification of complete exposure pathways.
- Screening of risks to human health and the environment for off-site residents and construction workers.

The preliminary risk screening provides a flexible, tiered approach to site evaluation. The process is used to develop risk-based, soil screening levels (SSLs) for protection of human health (U.S. Environmental Protection Agency, 1996). The soil screening process was conducted to the extent feasible to develop SSLs for arsenic found in soil at the subject property.

BACKGROUND

The subject property is approximately nine acres in size and located in a mixed light industrial and commercial setting. While the subject property is currently a vacant graded lot, PSI understands the subject property will be redeveloped with a large commercial warehouse building that will occupy the entire property. One level of subterranean parking will be constructed on the north central portion of the subject property.

A phase I prepared by PSI in 2006 revealed that from 1928 to 2006, the subject property had historically been used as former dry cleaning facility, a furniture company, a foundry, an automotive service station, and for agricultural use.

Prior environmental reports prepared for the subject property revealed that concentrations of Title 22 metals in soil samples, collected at the subject property, appeared to be above both PRGs and the California Department of Toxic Substances Control (DTSC) California Human Health Screening Levels (CHHSLs) for industrial and residential land use. No specific source of contamination was identified during the prior assessments. Previous reports suggested that these concentrations are consistent with average urban background levels and also may be a result of past releases from the variety of industrial and commercial tenants that formerly occupied the subject property.

As a result, a limited Phase II assessment was performed by PSI to assess the elevated metals concentrations previously detected at the subject property. The results of this investigation revealed concentrations of arsenic in soil samples at nine (9) locations throughout the property that exceeded both the industrial land use CHHSLs and industrial land use PRGs. Arsenic was commonly used as a pesticide and in electronic and wood manufacturing. These concentrations were found in samples collected from the upper 1 foot of soil except at one location at a depth of 5 feet bgs. The samples collected at depths of 10 and 15 feet bgs were below industrial land use regulatory action levels. As a result, the lower limit of the impacted soil is estimated to be less than 10 feet bgs. No other title 22 metals were detected above industrial land use CHHSLs or PRGs. Based on the result of this assessment PSI recommended either excavation of the soil with elevated metal concentrations, or a preliminary risk assessment.

PRELIMINARY RISK ASSESSMENT APPROACH

A comparison of the concentration of arsenic with the U.S. EPA Region 9 Industrial Soil PRGs and CHHSLs shows that, at several locations throughout the property, arsenic concentrations are higher than the PRGs and CHHSLs. Figure 2 shows the locations of detected arsenic at the subject property.

Based on these results, a soil screening assessment was conducted to develop SSLs that may be appropriate for industrial/commerical use for the construction phase of the communities. SSLs are not national cleanup standards. SSLs are risk-based concentrations derived from standardized equations combining exposure information assumptions with EPA toxicity data. Three approaches for developing screening levels are available through EPA's guidance document: Applying generic SSLs, developing simple, site-specific SSLs, and developing site-specific SSLs based on a more detailed modeling (U.S. Environmental Protection Agency, 1996). The approach taken in this preliminary risk screening was to develop simple, site-specific SSLs. The EPA has stated that, although SSLs are risk based, they do not eliminate the need to conduct a site-specific risk assessment for those areas identified as needing further investigation. SSLs are concentrations of contaminants in soil that are designed to be protective of exposures in a residential setting (U.S. Environmental Protection Agency, 1996). The SSLs are similar to PRGs and CHHSLs; however, they are developed with available chemical and site specific information. Where site specific information is not available, default values provided by the EPA are used (U.S. Environmental Protection Agency, 2001).

The SSLs do not take into account the cumulative effect of multiple contaminants. A more sophisticated toxicological risk assessment would be required for that type of analysis. As a result, the SSL may underestimate protective values where multiple contaminants are present and this limitation should be considered when comparing actual concentrations to the SSLs.

CARCINOGENIC RISK THRESHOLD COMPARISON

Arsenic has been identified through EPA's Integrated Risk Information System (IRIS) as a probable carcinogen based on sufficient evidence of carcinogenicity in animals. The EPA (2002) indicates that if cancer (target) risks are in the $1x10^{-6}$ or lower than, no further action is required. Risks greater than $1x10^{-4}$ require remediation and the risks between these two values require further study, such as this preliminary risk screening study.

The maximum concentration of arsenic detected at the subject property was divided by the respective industrial/commercial CHHSL and PRG. This ratio was then multiplied by $1x10^{-6}$ for comparison to the industrial/commercial cancer risk threshold of $1x10^{-6}$.

Table 1: Carcinogenic Risk Threshold Comparison

COMPOUND	TARGET RISK PRG	TARGET RISK CHHSL
Arsenic	$1.18x10^{-5}$	$7.97x10^{-5}$

The values presented above indicate that a risk screening study for the subject property is necessary.

RECEPTORS & EXPOSURE PATHWAYS

A review of the site conditions, current and future land use, and the characteristics of arsenic was conducted to develop most probable complete exposure pathways to future tenants, off-site residents, and construction workers at the subject property.

Groundwater was not considered a complete exposure pathway because groundwater is not currently used at the subject property and is not proposed to be used in the future development. Exposure pathways were identified as ingestion, dermal (skin), and fugitive dust through direct contact with soils (USEPA, March 2001).

As the entire property will be developed with a warehouse building or new landscaping, exposure pathways to future tenants of the subject property appear to be limited in extent and therefore, not a likely risk.

Two other primary receptors were identified and considered in the soil screening process. The SSLs were first calculated for construction workers present on site during the construction of the proposed development. The assumption of this assessment is that grading and excavation activities at the subject property will be conducted over a 158 day period.

As construction will be performed in a populated area, SSL calculations for off-site residents were also calculated as part of this assessment.

Calculations of risk-based SSLs for the complete exposure pathways is based on methods presented in RAGs HHEM, Part B (USEPA 1991a) and Soil Screening Guidance (USEPA 1996a, b). Briefly, these methods back calculate a soil concentration level from a target risk (for carcinogens) or hazard quotient (for non-carcinogens). Arsenic was identified as a carcinogen, so all subsequent calculations have been based on this assumption.

INGESTION AND DERMAL EXPOSURES

Since the 1998 when the PRG table was issued, exposure factors for dermal contact with soil have changed in a few cases (USEPA 2001). Recommended Reasonable Maximum Exposure (RME) defaults for adult workers' skin surface areas (3300 cm2/day) and soil adherence factors (0.2 mg/cm2) now differ from the defaults recommended for adult residents (5,700 cm2/day, 0.07 mg/cm2). This change is due to differences in the range of activities experienced by workers versus residents.

EPA has developed an approach to calculate SSLs for concurrent exposures to contaminants via the direct ingestion and dermal absorption pathways. This approach results in SSLs that are protective of exposures that are likely to occur from such

activities as outdoor work, children's outdoor play, excavation and gardening (USEPA 2001).

Ingestion and dermal absorption SSLs were also calculated for construction workers. The equations for this calculation are shown in Table 2 and Appendix A. Default values were used as input parameters, with the exception of the exposure frequency and exposure duration. Based on discussions with the development team, the exposure frequency is currently estimated at 158 days per year. This estimate is based on full-time operations for the anticipated grading and excavation schedule at the subject property. The exposure duration is estimated at 1 year based on the information provided by the development team.

FUGITIVE DUST

SSLs for the inhalation of fugitive dust were also calculated for construction workers at the subject property. Table 3 and Appendix A show the equations and terms used to calculate these SSLs. These calculations are based on a number of assumptions and on how construction will occur at the subject property. These assumptions were made as a result of discussions with the development team. Should the construction plan be different from these assumptions, re-estimation of the SSLs will be necessary.

Based on our discussions with the development team, grading and excavation activities at the subject property will take place over a 158 day schedule. This will be the time when dust emissions may be significant. The assumption is made that the existing roads surrounding the subject property will remain intact. As a result, roadways through the construction area will be paved.

In making these calculations, a construction period of 1 year was used as a project specific exposure duration (ED) and an exposure frequency (EF) of 158 days per year (accounting for no work during weekends and holidays) for the subject property were used in these calculations. In addition, the assumption was made that the construction area is approximately 9 acres in size. Equipment on site would include a D-3 tractor, one half ton and one three quarter ton pickup, one watering truck, and one truck and trailer rig for soil, and one miscellaneous vehicle with a combined vehicle tonnage of approximately 1,207 tons. The travel distance of these vehicles was estimated at 46.1 kilometers over a one year period of time (grading) that equated to each vehicle traveling four times per day along the road segment. Days of precipitation, used in these equations, in excess of 0.01 inches for Los Angeles was 35 days (National Oceanic and Atmospheric Administration Web Page). Default and chemical specific values were used for the remaining terms.

SSLs for the inhalation of fugitive dust were also calculated for off-site residents at the subject property during construction activities. Table 4 and Appendix A show the equations and terms used to calculate these SSLs. A construction period of 1 year was used as a project specific exposure duration (ED) and an exposure frequency (EF) of 158 days per year for the subject property were used in these calculations.

RESULTS

The SSLs prepared for each exposure pathway and each receptor are shown in Table 2. The maximum detected concentration for arsenic in subsurface soils (19 mg/kg) did not exceed the construction worker scenario SSL for ingestion and dermal absorption (25.13 mg/kg), or fugitive dust inhalation (73.37 mg/kg). The maximum detected concentration was also below the off-site resident SSL for fugitive dust inhalation (4,590 mg/kg) as well.

Table 5: Exposure Pathway SSLs

Maximum Detected Subsurface Concentration (mg/kg)	19
Construction Work Dermal Contact and Ingestion Soil Screening Level (mg/kg)	25.13
Construction Worker Fugitive Dust Inhalation Soil Screening Level (mg/kg)	73.67
Off-Site Resident Fugitive Dust Inhalation Soil Screening Level (mg/kg)	4,590

CONCLUSIONS

Estimated target risks for carcinogenicity, based on the maximum concentrations of arsenic detected in subsurface soils, were found to range from 1.18×10^{-5} to 7.97×10^{-5}. These estimates indicated that additional risk screening activities were warranted.

The results of the risk screening study indicate that the maximum level of arsenic detected in the subsurface soil is below the derived SSLs for dermal absorption and ingestion for construction workers and fugitive dust inhalation for construction workers and off-site residents. Therefore, it does not appear that any additional mitigation measures, other than those already used in industry standards for construction and grading, will be required for the proposed development. While no further assessment or mitigation is recommended at this time, it should be noted that only a regulatory agency can grant a no further action status to any property.

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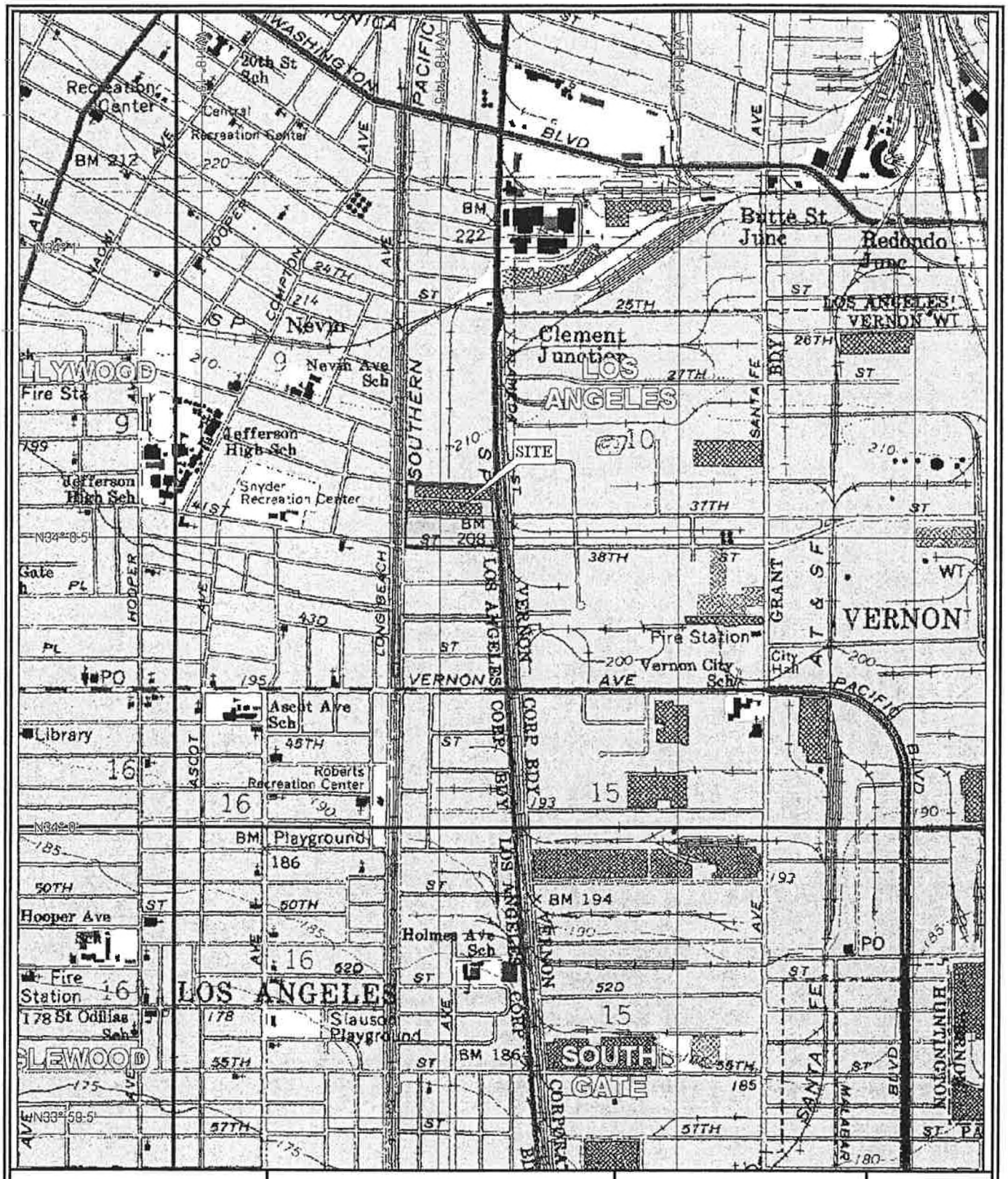
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U.S. Environmental Protection Agency, May 1992. Supplemental Guidance to RAGS: Calculating the Concentration Term, 9285.7-085.

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FIGURES



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PROJECT NAME:

41st and Alameda
Northwest corner of East 41st Street and South Alameda Avenue
Los Angeles, California 90058

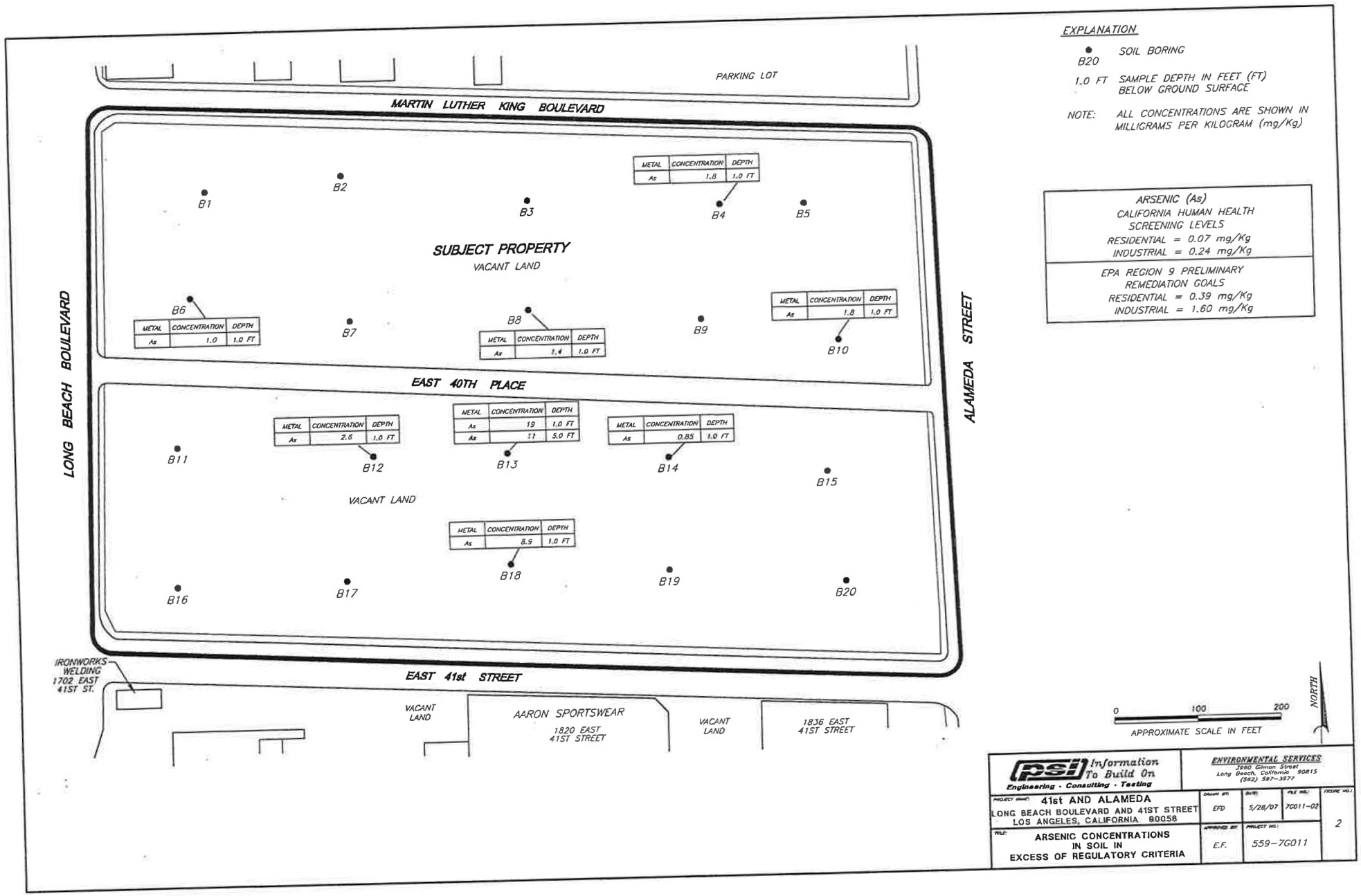
PSI PROJECT NO. 559-7G011

FIGURE 1 - SITE VICINITY MAP

Map:
Los Angeles Quadrangle
7.5' USGS Topographic Map

Scale: 1: 16,000
Date: 1981

N



EXPLANATION

B20 ● SOIL BORING

1.0 FT SAMPLE DEPTH IN FEET (FT) BELOW GROUND SURFACE

NOTE: ALL CONCENTRATIONS ARE SHOWN IN MILLIGRAMS PER KILOGRAM (mg/Kg)

ARSENIC (As)
CALIFORNIA HUMAN HEALTH SCREENING LEVELS RESIDENTIAL = 0.07 mg/Kg INDUSTRIAL = 0.24 mg/Kg
EPA REGION 9 PRELIMINARY REMEDIATION GOALS RESIDENTIAL = 0.39 mg/Kg INDUSTRIAL = 1.60 mg/Kg

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PROJECT NAME: 41st AND ALAMEDA LONG BEACH BOULEVARD AND 41ST STREET LOS ANGELES, CALIFORNIA 90058	DRAWN BY: EFD	DATE: 5/28/07	FILE NO.: 7G011-02	FIGURE NO.: 2
TITLE: ARSENIC CONCENTRATIONS IN SOIL IN EXCESS OF REGULATORY CRITERIA	APPROVED BY: E.F.	PROJECT NO.: 559-7G011		

TABLES

TABLE 2: CALCULATION OF SCREENING LEVEL FOR COMBINED SUBCHRONIC INGESTION AND DERMAL ABSORPTION EXPOSURE TO CARCINOGENIC CONTAMINANTS IN SOIL

Chemical: Arsenic
Scenario: Construction Worker

VARIABLE	DESCRIPTION	VALUE	UNIT
SSL	Soil Screening Level	25.13	mg/kg
TR	Target Risk	1.00E-06	unitless
BW	Body Weight	70	kg
AT	Averaging Time	70	Years
EF	Exposure Frequency	158	Days/Year
ED	Exposure Duration	1	Years
Sf_O	Oral Cancer Slope Factor	1.5	$(mg/kg)^{-1}$
IR	Soil Ingestion Rate	330	mg/d
SF_{ABS}	Dermally Adjusted Cancer Slope Factor	1.5	$(mg/kg)^{-1}$
AF	Skin-Soil Adherence Factor	0.3	$(mg/cm^2\text{-event})$
ABS_D	Dermal Absorption Fraction	0.03	unitless
SA	Skin Surface Area Exposed	3300.0	(cm^2)
EV	Event Frequency	1.0	events/day
ABS_{GL}	Gastro-Intestinal Absorption Factor	1.0	unitless

CALCULATED VALUES:

SSL= **25.13 mg/kg**

$$SSL = \frac{TR * BW * AT * 365\ ^{days}/_{year}}{(EF * ED * 10^{-6}\ mg/kg)\ \left[(SF_o * IR) - (SF_{ABS} * AF * ABS_D * SA * EV)\right]}$$

$$SF_{abs} = \frac{SF_o}{ABS_{GL}}$$

TABLE 3: CALCULATION OF SCREENING LEVEL FOR SUBCHRONIC INHALATION OF CARCINOGENIC FUGITIVE DUSTS

Chemical: Arsenic
Scenario: Construction Worker

VARIABLE	DESCRIPTION	VALUE	UNIT
SSL	Soil Screening Level	73.67	mg/kg
TR	Target Risk	1.00E-06	unitless
AT	Averaging Time	70	Years
URF	Unit Risk Factor	0.0043	$(\mu g/m^3)^{-1}$
EF	Exposure Frequency	158	Days/Year
ED	Exposure Duration	1	Years
PEF_{SC}	Subchronic Road Particulate Emission Factor	27,985	m^3/kg
Q/C_{SR}	Inverse of 1-Hour Average Air Concentration Along a Straight Road Segment Bisecting a 9 Acre Site	15.40	g/m^2- per kg/m^3
F_D	Dispersion Correction Factor	0.19	unitless
T	Total Construction Time	4,550,400	seconds
A_R	Surface Area of Contaminated Road Segment	2,920	m^2
W	Mean Vehicle Weight	1,207	tons
p	Number of days with at least 0.01 inches of precipitation	35.00	Days/Year
VKT	Sum of Fleet Vehicle Kilometers Traveled During the Exposure Duration	184.50	km

CALCULATED VALUES:

SSL= 73.67 mg/kg

$$SSL = \frac{TR * BW * AT * 365\ {}^{days}/_{year}}{URF * 1,000\ {}^{\mu g}/_{mg} * EF * ED * \frac{1}{PEF_{SC}}}$$

$$PEF_{SC} = \frac{Q}{C_{SR}} * \frac{1}{F_D} * \left[\frac{T * A_R}{556 * \left(\frac{W}{3}\right)^{0.4} * \frac{365\ {}^{days}/_{year} * p}{365\ {}^{days}/_{year}} * VKT} \right]$$

TABLE 4: CALCULATION OF SCREENING LEVEL FOR SUBCHRONIC INHALATION OF CARCINOGENIC FUGITIVE DUSTS

Chemical: Arsenic
Scenario: Off-Site Resident

VARIABLE	DESCRIPTION	VALUE	UNIT
SSL	Soil Screening Level	4,589.93	mg/kg
TR	Target Risk	1.00E-06	unitless
AT	Averaging Time	70	Years
URF	Unit Risk Factor	0.0043	$(\mu g/m^3)^{-1}$
EF	Exposure Frequency	158	Days/Year
ED	Exposure Duration	1	Years
PEF_{OFF}	Off-Site Particulate Emission Factor	1,743,584	m^3/kg
Q/C_{OFF}	Inverse of 1-Hour Average Air Concentration Along a Straight Road Segment Bisecting a 0.5-Acre Square Site	56.40	g/m^2- per kg/m^3
JT	Total Time-Averaged Emission Flux	0.000032350	$(g/m^2\text{-}s)$
M_{road}	Unit Mass Emitted from Unpaved Road Traffic	39,534,259.86	g
M_{wind}	Unit Mass Emitted From Wind Erosion	2,377,073.63	g
A_{site}	Areal extent of site	36,422.00	m^2
F_D	Dispersion Correction Factor	0.19	unitless
T	Total Construction Time	4,550,400	seconds
W	Mean Vehicle Weight	1,207	tons
p	Number of days with at least 0.01 inches of precipitation	35.00	Days/Year
VKT	Sum of Fleet Vehicle Kilometers Traveled During the Exposure Duration	184.50	km

CALCULATED VALUES:

SSL= **4,589.93 mg/kg**

$$SSL = \frac{TR * BW * AT * 365\ {}^{days}/_{year}}{URF * 1,000\ {}^{\mu g}/_{mg} * EF * ED * \frac{1}{PEF_{OFF}}}$$

APPENDIX-A

ASSUMPTIONS

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EXHIBIT A:

In analyzing the Max (surface) values:

Max (mg/Kg)=

In analyzing the Cancer Risk for the Max (sub-surface) values:

$$\text{Cancer Risk Exposure (mg/Kg)} = \frac{\text{Max (surface)}}{(\text{PRG or CHHSL}) \times 1 \times 10^{-6}}$$

PRG: chemical specific Preliminary Remedial Goal (PRG)
CHHSL: California Human Health Screening Level
1×10^{-6}: Cancer Risk

PSI utilized two main EPA sources to derive the SSL (Soil Screening Level) values utilized for the Chlorinated Pesticides Risk Screening:

Supplemental Guidance For Developing Soil Screening Levels for Superfund Sites, Peer Review Draft, March 2001. http://www.epa.gov/superfund/resources/soil/index.htm

Soil Screening Guidance User's Guide, Second Edition, July 1996.
http://www.epa.gov/superfund/resources/soil/index.htm

Risk Assessment Guidance for Superfund, December 2001.
http://www.epa.gov/superfund/programs/risk/ragsd/

Assumption:

PSI utilized the carcinogenic specific equations versus non-carcinogenic specific equations in deriving all the SSL values as arsenic is a probable human carcinogens as determined by the U.S. EPA.

In analyzing the Construction Worker's SSL's for Combined Ingestion and Dermal Absorption Exposure:

Please refer to Equation 5-1 taken from the EPA Supplemental Guidance For Developing SSL's For Superfund Sites (2001) on the following page.

Direct Ingestion and Dermal Absorption. Equations 5-1 and 5-2 are appropriate for addressing subchronic ingestion and dermal absorption exposure of construction workers to carcinogens and non-carcinogens, respectively. These equations produce SSLs for combined exposure of construction workers via these pathways.

Equation 5-1
Screening Level Equation for Combined Subchronic Ingestion and Dermal Absorption Exposure to Carcinogenic Contaminants in Soil
Construction Scenario - Construction Worker

$$\text{Screening Level (mg/kg)} = \frac{TR \times BW \times AT \times 365\,d/yr}{(EF \times ED \times 10^{-6}\,kg/mg)[(SF_o \times IR) + (SF_{ABS} \times AF \times ABS_d \times SA \times EV)]}$$

Parameter/Definition (units)	Default
TR/target cancer risk (unitless)	10^{-6}
BW/body weight (kg)	70
AT/averaging time (years)	70
EF/exposure frequency (days/year)	**site-specific**
ED/exposure duration (years)	**site-specific**
SF_o/oral cancer slope factor $(mg/kg\text{-}d)^{-1}$	chemical-specific (Appendix C)
IR/soil ingestion rate (mg/d)	330
SF_{ABS}/dermally adjusted cancer slope factor $(mg/kg\text{-}d)^{-1}$	chemical-specific (Equation 3-3)
AF/skin-soil adherence factor (mg/cm^2-event)	**0.3**
ABS_d/dermal absorption fraction (unitless)	chemical-specific (Exhibit 3-3 and Appendix C)
SA/skin surface area exposed (cm^2)	**3,300**
EV/event frequency (events/day)	**1**

Because no toxicity data are presently available for directly evaluating dermal exposures to contaminants, EPA has developed a method to extrapolate oral toxicity values for use in dermal risk assessments. This extrapolation method, shown in Equations 3-3 and 3-4, is necessary because most oral RfDs and cancer slope factors are based on an administered dose (e.g., in food or water) while dermal exposure equations estimate an absorbed dose. Specifically, dermal exposure equations account for the relative ability of a given contaminant to pass through the skin and into the bloodstream. The extrapolation method applies a gastro-intestinal absorption factor (ABS_{GI}) to the available oral toxicity values to account for the absorption efficiency of an administered dose across the gastro-intestinal tract and into the bloodstream. Oral toxicity values should be adjusted when the gastro-intestinal absorption of the chemical in question is significantly less than 100 percent; a cutoff of 50 percent is recommended to reflect the intrinsic variability in the analysis of absorption studies. A list of chemical-specific ABS_{GI} factors for specific compounds is presented as Exhibit C-7 in Appendix C.

Equation 3-3
Calculation of Carcinogenic Dermal Toxicity Values

$$SF_{ABS} = \frac{SF_O}{ABS_{GI}}$$

Parameter/Definition (units)	Default
SF_{ABS}/dermally adjusted slope factor $(mg/kg\text{-}d)^{-1}$	chemical-specific
SF_O/oral slope factor $(mg/kg\text{-}d)^{-1}$	chemical-specific (Appendix C)
ABS_{GI}/gastro-intestinal absorption factor (unitless)	chemical-specific (Appendix C)

Equation 3-4
Calculation of Non-Carcinogenic Dermal Toxicity Values

$$RfD_{ABS} = RfD_O \times ABS_{GI}$$

Parameter/Definition (units)	Default
RfD_{ABS}/dermally adjusted reference dose (mg/kg-d)	chemical-specific
RfD_O/oral reference dose (mg/kg-d)	chemical-specific (Appendix C)
ABS_{GI}/gastro-intestinal absorption factor (unitless)	chemical-specific (Appendix C)

To be protective of exposures to carcinogens in a residential setting, Superfund focuses on individuals who may live in an area for an extended period of time (e.g., 30 years) from childhood through adulthood. Equation 3-1 uses an age-adjusted dermal factor (SFS) to account for changes in skin surface area, body weight, and adherence factor. The SFS, presented in Equation 3-5, is a time-weighted average of these parameters for receptors exposed from age one to 31. EPA recommends that a default SFS of 360 mg-yr/kg-event be used. For more information regarding the derivation of this time-weighted average value, please consult *RAGS, Part E,* Section 3.2.2.5, Equation 3.20.

Exhibit C-7 GASTROINTESTINAL ABSORPTION EFFICIENCIES AND ADJUSTMENT OF DERMAL TOXICITY FACTORS			
CAS Number	**Compound**	**Percent Absorbed***	**ABS_{GI}**
Organics			
57-74-9	Chlordane	80%	1
50-29-3	DDT	70-90%	1
87-86-5	Pentachlorophenol	76-100%	1
N/A	Polycyclic aromatic hydrocarbons (PAHs)	58-89%	1
N/A	Other Dioxins/Dibenzofurans	>50%	1
N/A	All other organic compounds	generally >50%	1
Inorganics			
7440-38-2	Arsenic	95%	1
7440-43-9	Cadmium	2.5-5%	0.025

* *RAGS Part E*, U.S. EPA, in press.

are assumed to have 2,800 cm^2 of exposed skin surface area (face, forearms, hands, lower legs, and feet), while adults are assumed to have 5,700 cm^2 exposed (face, forearms, hands, and lower legs). These SA values represent the median (50th percentile) values for all children and adults (U.S. EPA, 1997a).

The last input needed to calculate the dermal portion of the ingestion/dermal SSLs is the chemical-specific dermal absorption fraction (ABS_d). Values for seven individual compounds and two classes of compounds are presented in Exhibit 3-3. For those compounds that are classified as both semi-volatile and as a PAH, the ABS_d default for PAHs should be applied.

Exhibit 3-3

RECOMMENDED DERMAL ABSORPTION FRACTIONS

Compound	Dermal Absorption Fraction (ABS_d)
Arsenic	0.03
Benzo(*a*)pyrene	0.13
Cadmium	0.001
Chlordane	0.04
DDT	0.03
Lindane	0.04
PAHs	0.13
Pentachlorophenol	0.25
Semi-volatile organic compounds	0.1

Source: U.S. EPA, *RAGS, Part E, Supplemental Guidance for Dermal Risk Assessment*, in press.

3.2.2 Migration of Volatiles Into Indoor Air

Subsurface contamination in either soil or ground water may adversely affect indoor air quality through the infiltration of contaminant vapors into the basement or ground floor of an on-site building. The potential for inhalation exposure via this pathway elicited substantial comment during the development of the 1996 *SSG*.

Attachment D. Regulatory and Human Health Benchmarks Used for SSL Development

CAS Number	Chemical Name	Maximum Contaminant Level Goal (mg/L)		Maximum Contaminant Level (mg/L)		Water Health Based Limits (mg/L)		Cancer Slope Factor $(mg/kg\text{-}d)^{-1}$			Unit Risk Factor $(\mu g/m^3)^{-1}$			Reference Dose (mg/kg-d)		Reference Concentration (mg/m^3)	
		MCLG (PMCLG)	Ref.[a]	MCL (PMCL)	Ref.[a]	HBL[b]	Basis	Carc. Class[c]	SF_o	Ref.[a]	Carc. Class[c]	URF	Ref.[a]	RfD	Ref.[a]	RfC	Ref.[a]
83-32-9	Acenaphthene					2E+00	RfD							6.0E-02	1		
67-64-1	Acetone (2-Propanone)					4E+00	RfD	D			D			1.0E-01	1		
309-00-2	Aldrin					5E-06	SF_o	B2	1.7E+01	1	B2	4.9E-03	1	3.0E-05	1		
120-12-7	Anthracene					1E+01	RfD	D			D			3.0E-01	1		
7440-36-0	Antimony	6.0E-03	3	6.0E-03	3									4.0E-04	1		
7440-38-2	Arsenic			5.0E-02	3			A	1.5E+00	1	A	4.3E-03	1	3.0E-04	1		
7440-39-3	Barium	2.0E+00	3	2.0E+00	3									7.0E-02	1	5.0E-04	2
56-55-3	Benz(*a*)anthracene					1E-04	SF_o	B2	7.3E-01	4	B2						
71-43-2	Benzene			5.0E-03	3			A	2.9E-02	1	A	8.3E-06	1				
205-99-2	Benzo(*b*)fluoranthene					1E-04	SF_o	B2	7.3E-01	4	B2						
207-08-9	Benzo(*k*)fluoranthene					1E-03	SF_o	B2	7.3E-02	4	B2						
65-85-0	Benzoic acid					1E+02	RfD							4.0E+00	1		
50-32-8	Benzo(*a*)pyrene			2.0E-04	3			B2	7.3E+00	1	B2						
7440-41-7	Beryllium	4.0E-03	3	4.0E-03	3			B2	4.3E+00	1	B2	2.4E-03	1	5.0E-03	1		
111-44-4	Bis(2-chloroethyl)ether					8E-05	SF_o	B2	1.1E+00	1	B2	3.3E-04	1				
117-81-7	Bis(2-ethylhexyl)phthalate			6.0E-03	3			B2	1.4E-02	1	B2			2.0E-02	1		
75-27-4	Bromodichloromethane			1.0E-01 *	3			B2	6.2E-02	1	B2			2.0E-02	1		
75-25-2	Bromoform (tribromomethane)			1.0E-01 *	3			B2	7.9E-03	1	B2	1.1E-06	1	2.0E-02	1		
71-36-3	Butanol					4E+00	RfD	D			D			1.0E-01	1		
85-68-7	Butyl benzyl phthalate					7E+00	RfD	C			C			2.0E-01	1		
7440-43-9	Cadmium	5.0E-03	3	5.0E-03	3						B1	1.8E-03	1	1.0E-03**	1		
86-74-8	Carbazole					4E-03	SF_o	B2	2.0E-02	2							
75-15-0	Carbon disulfide					4E+00	RfD							1.0E-01	1	7.0E-01	1
56-23-5	Carbon tetrachloride			5.0E-03	3			B2	1.3E-01	1	B2	1.5E-05	1	7.0E-04	1		
57-74-9	Chlordane			2.0E-03	3			B2	1.3E+00	1	B2	3.7E-04	1	6.0E-05	1		
106-47-8	*p*-Chloroaniline					1E-01	RfD							4.0E-03	1		
108-90-7	Chlorobenzene	1.0E-01	3	1.0E-01	3			D			D			2.0E-02	1	2.0E-02	2
124-48-1	Chlorodibromomethane	6.0E-02	3	1.0E-01 *	3			C	8.4E-02	1	C			2.0E-02	1		
67-66-3	Chloroform			1.0E-01 *	3			B2	6.1E-03	1	B2	2.3E-05	1	1.0E-02	1		
95-57-8	2-Chlorophenol					2E-01	RfD							5.0E-03	1		

* Proposed MCL = 0.08 mg/L, *Drinking Water Regulations and Health Advisories*, U.S. EPA (1995).

** Cadmium RfD is based on dietary exposure.

From: Soil Screening Guidance
User's Guide
July 1996

Attachment D (continued)

CAS Number	Chemical Name	Maximum Contaminant Level Goal (mg/L)		Maximum Contaminant Level (mg/L)		Water Health Based Limits (mg/L)		Cancer Slope Factor $(mg/kg\text{-}d)^{-1}$			Unit Risk Factor $(\mu g/m^3)^{-1}$			Reference Dose (mg/kg-d)		Reference Concentration (mg/m^3)	
		MCLG (PMCLG)	Ref. [a]	MCL (PMCL)	Ref. [a]	HBL [b]	Basis	Carc. Class [c]	SF_o	Ref. [a]	Carc. Class [c]	URF	Ref. [a]	RfD	Ref. [a]	RfC	Ref. [a]
127-18-4	Tetrachloroethylene			5.0E-03	3				5.2E-02	5		5.8E-07	5	1.0E-02	1		
7440-28-0	Thallium	5.0E-04	3	2.0E-03	3												
108-88-3	Toluene	1.0E+00	3	1.0E+00	3			D			D			2.0E-01	1	4.0E-01	1
8001-35-2	Toxaphene			3.0E-03	3			B2	1.1E+00	1	B2	3.2E-04	1				
120-82-1	1,2,4-Trichlorobenzene	7.0E-02	3	7.0E-02	3			D			D			1.0E-02	1	2.0E-01	2
71-55-6	1,1,1-Trichloroethane	2.0E-01	3	2.0E-01	3			D			D					1.0E+00	5
79-00-5	1,1,2-Trichloroethane	3.0E-03	3	5.0E-03	3			C	5.7E-02	1	C	1.6E-05	1	4.0E-03	1		
79-01-6	Trichloroethylene	zero	3	5.0E-03	3				1.1E-02	5		1.7E-06	5				
95-95-4	2,4,5-Trichlorophenol					4E+00	RfD							1.0E-01	1		
88-06-2	2,4,6-Trichlorophenol					8E-03	SF_o	B2	1.1E-02	1	B2	3.1E-06	1				
7440-62-2	Vanadium					3E-01	RfD							7.0E-03	2		
108-05-4	Vinyl acetate					4E+01	RfD							1.0E+00	1	2.0E-01	1
75-01-4	Vinyl chloride (chloroethene)			2.0E-03	3			A	1.9E+00	2	A	8.4E-05	2				
108-38-3	*m* -Xylene	1.0E+01	3 *	1.0E+01	3 *			D			D			2.0E+00	2		
95-47-6	o -Xylene	1.0E+01	3 *	1.0E+01	3 *			D			D			2.0E+00	2		
106-42-3	*p* -Xylene	1.0E+01	3 *	1.0E+01	3 *			D			D			2.0E+00	1 **		
7440-66-6	Zinc					1E+01	RfD	D			D			3.0E-01	1		

* MCL for total xylenes [1330-20-7] is 10 mg/L.

** RfD for total xylenes is 2 mg/kg-day.

[a] References:
1 = IRIS, U.S. EPA (1995)
2 = HEAST, U.S. EPA (1995)
3 = U.S. EPA (1995)
4 = OHEA, U.S. EPA (1993)
5 = Interim toxicity criteria provided by Superfund Health Risk Technical Support Center, Environmental Criteria Assessment Office (ECAO), Cincinnati, OH (1994)
6 = ECAO, U.S. EPA (1994i)
7 = ECAO, U.S. EPA (1994h)

[b] Health Based Limits calculated for 30-year exposure duration, 10^{-6} risk or hazard quotient = 1.

[c] Categorization of overall weight of evidence for human carcinogenicity:
Group A: human carcinogen
Group B: probable human carcinogen
B1: limited evidence from epidemiologic studies
B2: "sufficient" evidence from animal studies and "inadequate" evidence or "no data" from epidemiologic studies
Group C: possible human carcinogen
Group D: not classifiable as to health carcinogenicity
Group E: evidence of noncarcinogenicity for humans

From: Soil Screening Guidance
User's Guide
July 1996

In analyzing the Construction Worker's SSL's for Inhalation of Fugitive Dusts:

Please refer to Equation 5-3 taken from the EPA Supplemental Guidance For Developing SSL's For Superfund Sites (2001) on the following page.

EF/exposure frequency (days/year): 158 days
EF/exposure duration (years): 1 Year

The above values were provided by Robert Ward and Associates

T/Total time over which construction occurs (s):

Taking the values above,

For the subject property: 8 hours/day x 158 days x 1 year x 3,600 seconds(s)/hour = 4,550,400seconds

W/mean vehicle weight (tons):

Equipment	Scheduled Days	weight (lbs)	Weight (tons)	(Ton*Scheduled Days)
CAT D8 Dozer	66	84,850	42.4	2,800
CAT 330 Excavator	207	79,700	39.9	8,249
Backhoe	123	15,000	7.5	923
CAT 966 Loader	143	52,254	26.1	3,736
CAT CS-573 Compactor	153	30,319	15.2	2,319
Grader	39	30,000	15.0	585
End Dump Trailer	4,527	76,000	38.0	172,026

Total Tonnage*Scheduled Days	190,638
Total Number of Construction Days	158
Average Tonnage per Day (W)	1,207

The above weights for various equipment were taken from the Caterpillar Equipment website: www.caterpillar.com

p/number of days with at least 0.01 inches of precipitation (days/year): 35 days – taken from the National Oceanic and Atmospheric Administration Website.

VKT/sum of fleet vehicle kilometers traveled during the exposure duration (km):

Total Vehicle Scheduled Days	5258
Total Number of Construction Days	158
Average Number of Vehicles Scheduled per day	33.28

Length of Road Bisecting Property (km)	0.292
Vehicle trips per day	4
Total Number of Construction Days	158
VKT (km)	184.5

Equation 5-3
Screening Level Equation for Subchronic Inhalation of Carcinogenic Fugitive Dusts
Construction Scenario - Construction Worker

$$\text{Screening Level (mg/kg)} = \frac{TR \times AT \times 365 d/yr}{URF \times 1{,}000 \mu g/mg \times EF \times ED \times \frac{1}{PEF_{sc}}}$$

Parameter/Definition (units)	Default
TR/target cancer risk (unitless)	10^{-6}
AT/averaging time (years)	70
EF/exposure frequency (days/year)	**site-specific**
ED/exposure duration (years)	**site-specific**
PEF_{sc}/subchronic road particulate emission factor (m^3/kg)	**site-specific (Equation 5-5)**

Equation 5-4
Screening Level Equation for Subchronic Inhalation of Non-carcinogenic Fugitive Dusts
Construction Scenario - Construction Worker

$$\text{Screening Level (mg/kg)} = \frac{THQ \times AT \times 365 d/yr}{EF \times ED \times \left(\frac{1}{HBL_{sc}} \times \frac{1}{PEF_{sc}} \right)}$$

Parameter/Definition (units)	Default
THQ/target hazard quotient (unitless)	1
AT/averaging time (years)	**site-specific[a]**
EF/exposure frequency (days/year)	**site-specific**
ED/exposure duration (years)	**site-specific**
HBL_{sc}/subchronic health-based limit (mg/m^3)	chemical-specific
PEF_{sc}/subchronic road particulate emission factor (m^3/kg)	**site-specific (Equation 5-5)**

[a] For non-carcinogens, averaging time equals exposure duration.

Equation 5-5
Derivation of the Particulate Emission Factor
Construction Scenario - Construction Worker

$$PEF_{sc} \bullet Q/C_{sr} \times \frac{1}{F_D} \times \left[\frac{T \times A_R}{556 \times \left(\frac{W}{3}\right)^{0.4} \times \frac{(365d/yr \bullet p)}{365d/yr} \times \bullet \ VKT} \right]$$

Parameter/Definition (units)	Default
PEF_{sc}/subchronic road particulate emission factor (m^3/kg)	**site-specific**
Q/C_{sr}/ inverse of 1-h average air concentration along a straight road segment bisecting a 0.5-acre square site (g/m^2-s per kg/m^3)	**23.02**
F_D/dispersion correction factor (unitless)	0.185 (Appendix E)
T/total time over which construction occurs (s)	**site-specific**
A_R/surface area of contaminated road segment (m^2) **L_R/length of road segment (ft)** **W_R/width of road segment (ft)**	**274.213** **($A_R = L_R \times W_R \times 0.092903 m^2/ft^2$)**
W/mean vehicle weight (tons)	**site-specific**
p/number of days with at least 0.01 inches of precipitation (days/year) (see Figure 5-2)	**site-specific**
• VKT/sum of fleet vehicle kilometers traveled during the exposure duration (km)	**site-specific**

The number of days with at least 0.01 inches of rainfall can be estimated using Exhibit 5-2. Mean vehicle weight (W) can be estimated by assuming the numbers and weights of different types of vehicles. For example, assuming that the daily unpaved road traffic consists of 20 two-ton cars and 10 twenty-ton trucks, the mean vehicle weight would be:

$$W = [(20 \text{ cars} \times 2 \text{ tons/car}) + (10 \text{ trucks} \times 20 \text{ tons/truck})]/30 \text{ vehicles} = 8 \text{ tons}$$

The sum of the fleet vehicle kilometers traveled during construction (• VKT) can be estimated based on the size of the area of surface soil contamination, assuming the configuration of the unpaved road, and the amount of vehicle traffic on the road. For example, if the area of surface soil contamination is 0.5 acres (or 2,024 m^2), and one assumes that this area is configured as a square with the unpaved road segment dividing the square evenly, the road length would be equal to the square root of 2,024 m^2, 45 m (or 0.045 km). Assuming that each vehicle travels the length of the road once per day, 5 days per week for a total of 6 months, the total fleet vehicle kilometers traveled would be:

- VKT = 30 vehicles x 0.045 km/day x (52 wks/yr ÷ 2) x 5 days/wk = 175.5 km

EXHIBIT A (continued)

In analyzing the Off-Site Resident's SSL's for Inhalation of Fugitive Dusts:

Please refer to Equation 5-7 taken from the EPA Supplemental Guidance For Developing SSL's For Superfund Sites (2001) on the following page.

Equation 5-7
Screening Level Equation for Chronic Inhalation of Carcinogenic Fugitive Dust Construction Scenario - Off-Site Resident

$$\text{Screening Level (mg/kg)} = \frac{TR \times AT \times 365 d/yr}{URF \times 1{,}000 \mu g/mg \times EF \times ED \times \frac{1}{PEF_{off}}}$$

Parameter/Definition (units)	Default
TR/target cancer risk (unitless)	10^{-6}
AT/averaging time (years)	70
URF/inhalation unit risk factor (• $g/m^3)^{-1}$	chemical-specific (Appendix C)
EF/exposure frequency (days/year)	**350**
ED/exposure duration (years)	**30**
PEF_{off}/off-site particulate emission factor (m^3/kg)	**4.40×10^9 (Equation 5-9)**

Equation 5-8
Screening Level Equation for Chronic Inhalation of Non-carcinogenic Fugitive Dust Construction Scenario - Off-Site Resident

$$\text{Screening Level (mg/kg)} = \frac{THQ \times AT \times 365 d/yr}{EF \times ED \times \left[\frac{1}{RfC} \times \frac{1}{PEF_{off}}\right]}$$

Parameter/Definition (units)	Default
THQ/target hazard quotient (unitless)	1
AT/averaging time (years)	**30[a]**
EF/exposure frequency (days/year)	**350**
ED/exposure duration (years)	**30**
RfC/inhalation reference concentration (mg/m^3)	chemical-specific (Appendix C)
PEF_{off}/off-site particulate emission factor (m^3/kg)	**4.40×10^9 (Equation 5-9)**

[a] For non-carcinogens, averaging time equals exposure duration.

Equation 5-9 calculates the particulate emission factor for off-site residents (PEF_{off}). Because it normalizes the mass of fugitive dust emitted over 30 years, this equation requires separate estimates of the mass of dust emitted by traffic on unpaved roads during construction and the mass of dust emitted by wind erosion. These are calculated using Equation 5-10 (based on U.S. EPA, 1985) and Equation 5-11 (based on Cowherd et al., 1985), respectively.

Q/C_{off} can be derived for any source size using the equation and look-up table in Appendix D, Exhibit D-4. (The default Q/C_{off} factor assumes a 0.5 acre source size.) The look-up table in Exhibit D-4 provides the three coefficients for the Q/C_{off} equation (A, B, and C) for each of 29 cities selected to be representative of the range of meteorologic conditions across the country. The Q/C_{off} equation for each city was derived from the results of modeling runs of EPA's ISC3 dispersion model using five years of meteorological data. To calculate a site-specific Q/C_{off} factor, the site manager must first identify the climatic zone and city most representative of meteorological conditions at the site. Appendix D includes a map of climatic zones to help site managers select the appropriate Q/C_{off} coefficients. Once the coefficients have been identified, Q/C_{off} can be calculated for any source size and input into Equation 5-9 to derive a site-specific PEF_{off}.

Equation 5-9
Derivation of the Particulate Emission Factor
Construction Scenario - Off-Site Resident

$$PEF_{off} = Q/C_{off} \times \frac{1}{J_T}$$

where:

$$J_T = \frac{M_{road} \cdot M_{wind}}{A_{site} \times ED \times (3.1536 \times 10^7 s/yr)}$$

Parameter/Definition (units)	Default
PEF_{off}/off-site particulate emission factor (m^3/kg)	4.40×10^9
Q/C_{off}/inverse of the mean concentration at the boundary of a 0.5-acre-square source (g/m^2-s per kg/m^3)	**89.03 (Appendix D, Appendix E)**
J_T/total time-averaged emission flux (g/m^2-s)	**site-specific**
M_{road}/unit mass emitted from unpaved road traffic (g)	**site-specific (Equation 5-10)**
M_{wind}/unit mass emitted from wind erosion (g)	**site-specific (Equation 5-11)**
A_{site}/areal extent of site (m^2)	**2,024**
ED/exposure duration (year)	**30**

APPENDIX-B

SOIL MANAGEMENT PLAN

SOIL MANAGEMENT PLAN

This section presents a plan for managing arsenic containing soil at the subject property during construction and during normal course of occupancy and operation and maintenance activities of the proposed development.

The Soil Management Plan (SMP) should be reviewed at a minimum annually and modified accordingly to conditions, changes in use, or laws and/or regulations. All activities should be conducted in accordance with local, state, and federal laws and regulations.

MITIGATION DURING CONSTRUCTION

As stated in the Risk Assessment, the purpose of this section is to reduce exposures of construction workers and off-site residents to arsenic during construction. The primary exposure pathways for construction workers and off-site residents at the subject property are ingestion and dermal contact and fugitive dust inhalation. The following are a best management practices that should be followed during the proposed construction program.

IMPORTED SOIL

All imported soils should be certified "clean" from hazardous substances by the supplier including, but not limited to, arsenic and heavy metals. An alternative to this certification is the representative sampling and testing of source materials prior to transporting to the proposed development.

PERSONAL PROTECTIVE EQUIPMENT

The Contractors are responsible for developing and implementing their own Health and Safety Plans and the protection of their workers. Available information suggests that ingestion and dermal exposure pathways for construction worker are minimized through personal protective clothing, dust control, and good work hygiene practices. Personal Protective Equipment (PPE) should be selected which will protect construction personnel from the hazards and potential hazards they are likely to encounter during site demolition and reconstruction. The demolition and grading contractors must also designate an onsite Health and Safety Representative from their onsite work force to monitor personnel.

In general terms, levels of protection associated with hazardous materials are divided into one of four levels, A-D. Levels A and B are normally associated with hazardous waste remediation and require the use of various levels of respiratory protection and specialized suites and gloves and boots. Level C requires the use of protective clothing, without respirators and Level D has no specific requirements for protective clothing other than normal construction clothing.

Based on the task hazard analysis, initial PPE in areas where soils are suspected to be impacted with arsenic should be:

- A modified level D PPE including long sleeve shirts, long pants, gloves and hard hats and safety vests are required at the site at all times during demolition, grading, excavation,

plumbing, electrical, backfilling and other outdoor construction activities where contact with soils occurs.

- If air monitoring and real-time respirable dust monitoring indicates airborne concentrations of dust above 3 milligrams per cubic meter (mg/m3), PPE should be upgraded to the Level C as described below. If a previously unidentified material is discovered during work operations, PPE should be modified as necessary and at the determination of the Certified Industrial Hygienist (CIH). The contractor is responsible for air monitoring on behalf of its worker safety program.

Upgraded PPE Requirements

Location	Tasks	EPA Level	Equipment Required
Construction Site	All Tasks	C	Half mask air-purifying respirator equipped with HEPA cartridges Hard Hat Tyvek Coveralls/raingear Rubber Over-boots Orange Safety Vests

- The level of protection provided by PPE selection should be increased when additional information on site conditions shows that increased protection is necessary to reduce workers and off-site tenant exposures below established OSHA Permissible Exposure Limits (PELs) and published exposures levels for hazardous substances and health hazards.

- If the PPE is upgraded to Level C, a new disposable coverall is required each time a designated work area is entered. Require all workers to remove coveralls and disposable footwear covers or boots when exiting the work area. The contractor should require that workers NOT eat, drink, smoke, chew tobacco or gum, or apply cosmetics in the Work Area. To eat, chew, drink or smoke, workers should follow the procedure described above, and then dress in street clothes before entering the non-work areas.

- No eating or smoking should be conducted on the project sites. Hand wash (i.e. hygiene) stations should be present at exits to the construction area and adjacent to portable toilets to minimize dermal contact and ingestion.

FUGITIVE DUST

Fugitive dust is a concern for both construction workers and off-site tenants. The following are the requirements and stipulations associated with the excavation of material at the site related to environmental factors.

- Dust control measures should include perimeter non-permeable fencing along the perimeter of the construction area.

- Water or dust suppressant material should be applied regularly and frequently to exposed soils to minimize dust. Plastic sheeting of appropriate thickness may be used as an alternative for dust control.

- Trucks transporting soil onsite should be covered or tarped to minimize dust generation.

- Vehicular traffic and speeds should be kept to a minimum to minimize dust generation.

- Dust control measures should prevent visible fugitive dust from spreading beyond the property line bordering the source of the fugitive dust.

- Dust control measures should reduce dust levels to no visible emissions beyond the construction site.

- All stockpile locations should be secured behind locked fencing. The stockpile areas should be properly identified with appropriate signage. The stockpile areas should be covered with 6 mil polyethylene sheeting and appropriate runoff preventative measures implemented.

RUNOFF CONTROLS

The Contractor should ensure that all appropriate procedures are implemented to prevent storm and other runoff from the construction area. The construction project should comply with applicable laws and their site specific Stormwater Management Plan and specific permit requirements on this matter.

POST CONSTRUCTION AND OCCUPANCY MITIGATION

While the potential exposure pathway of arsenic in subsurface soils to future tenants of the subject property has been mitigated by the design of the proposed structure, there may be instances in the future where landscaping, repair work, or additional construction may require the disturbance of documented arsenic impacted soils. In the events of such incidents, the following best management practices should be observed.

MANAGEMENT MAINTENANCE PERSONNEL

Trained maintenance personnel should be responsible for the following activities in areas where soil is suspected of being impacted with arsenic:

- Planting, landscaping or future activities that require excavation or soil disturbance where soils impacted with arsenic are suspected. Appropriate cover must be maintained in areas where arsenic in soils are suspected to minimize exposure to dust, ingestion, or personal contact.

- A record of soil disturbance activity in arsenic impacted areas should be maintained. These records should be maintained at a central location and should be available to management personnel at all times.

- Subsurface utility line repair in areas where soils are suspected to be impacted with arsenic should be conducted by trained personnel or an approved subcontractor. Soil disturbance in areas suspected of containing arsenic

impacted soils should be limited to the area of repair. The exposed soil in these areas should be covered with plastic until the utility line is repaired. Appropriate measures should be taken upon backfilling to prevent exposure to the soils suspected of being impacted with arsenic. Appropriate measures may include, but not be limited to, placing a layer of clean soil, a minimum of 6 inches, in the upper portion of the trench and then planting ground cover; or paving the surface of the trench. The thickness of the clean soil layer is dependent upon site conditions and scheduled use with the purpose to prevent dust migration of the impacted soil and to minimize exposures to tenants, visitors, and workers. Greater thickness of the "clean" soil layer may be warranted in areas where unauthorized penetration of this layer is increased such as in landscaped areas.

- All work areas or areas under repair that require disturbing soils suspected to be impacted with arsenic should be secured in such a manner to keep tenants and children from entering the work area.

- No eating, drinking, or smoking should occur within immediate work areas containing soils suspect of being impacted with arsenic to prevent ingesting contaminated material. To minimize transference of soils impacted with arsenic into the subject property and different locations, maintenance personnel will take care not to enter areas that are not required by their job duties. Maintenance personnel should wash their hand before leaving work areas suspected of containing soils impacted with arsenic to minimize dermal contact and ingestion.

- Disposable suits or coveralls should be used when digging or contacting soils suspected of being impacted with arsenic to prevent transferring the pesticide impacted soils from the work area on worker clothing. Soiled coveralls used when working in these areas should be deposited on site for either disposal or commercial cleaning to minimize transport of impacted clothing to worker homes.

- Monthly visual inspections should be conducted to monitor for areas of exposed soils in areas suspected of containing soils impacted with arsenic. Appropriate measures should be implemented to prevent exposure to these soils.

NOTIFICATIONS

Where tenants, contractors, and visitors may contact soils impacted with arsenic through routine and acceptable activities, notifications by the Property Manager should be made to these groups about the presence of arsenic.

EMPLOYEE TRAINING

A training program is essential for the proper implementation and maintenance of the SMP. The training program should include as a minimum initial training and annual refreshers as specified in 29 CFR 1910.1200. Additionally, the training program should inform maintenance personnel responsible for implementing activities identified in the SMP of the components and goals of the plan. The Maintenance Manager is responsible for insuring that its personnel are adequately trained and capable of carrying out their work with arsenic impacted soil in a manner that minimizes their exposure and the exposures of tenants, visitors and employees of the site to arsenic impacted soil.

The training program should address topics such as minimizing soil disturbance and dust control and good housekeeping and material management practices. The Maintenance Manager should implement periodic training, such that all appropriate facility personnel are familiar with the SMP.

PERSONNAL PROTECTIVE EQUIPMENT

It may be necessary at times to wear Personal Protective Equipment (PPE) when handling or disturbing arsenic impacted soils. Ingestion and dermal exposure pathways for maintenance personnel are minimized through personal protective clothing, dust control, and good work hygiene practices. PPE should be selected which will protect maintenance personnel from the hazards and potential hazards they are likely to encounter during the handling or disturbance of soils suspect of being impacted by arsenic. Selection of the appropriate PPE should be made by the onsite health and safety officer based on the monitoring data and the thresholds listed in the on site health and safety plan.

Protective clothing must be worn whenever the wearer may come into contact with soils impacted by arsenic. One example of protective clothing may be the use of coveralls (disposable are acceptable) and gloves. Soiled coveralls used while working in impacted areas should be deposited on site for disposal or commercial cleaning to minimize transport of the impacted clothing to worker homes. Some examples of work that may occur in an area suspect of containing arsenic include:

- Soil disturbance beneath protective ground cover and protective clean soil cover (i.e., digging or trenching).
- Subsurface utility repair.
- Construction or demolition activities around foundations of existing residences.

ANNUAL SITE EVALUATION

Annual site evaluations should be conducted by trained maintenance personnel responsible for the management and maintenance of the SMP to ensure a safe working environment. These evaluations should include the following:

- Annual inspections should be conducted by appropriate personnel and will evaluate the overall effectiveness of the SMP.

- Research recordkeeping.

- Submit summary report of findings to Facility Manager including any corrective actions that are necessary and suggestions for improvement to the SMP.

RECORDKEEPING AND INTERNAL REPORTING

The SMP including records of all incidents and modifications to the SMP should be maintained at a central location on site and should be available to management personnel at all times. Soil disturbances, including excavations, utility repairs, street repair or maintenance in areas where soils are suspected of being impacted with arsenic should be documented and maintained with the SMP at the central location.

All incidents of noncompliance with the plan must be documented in the annual inspection report and be addressed immediately.

APPENDIX K

SOIL VAPOR SURVEY, MARCH 2011

SOIL VAPOR SURVEY
HOROWITZ PROPERTY
TWO CITY BLOCKS BOUNDED BY MARTIN LUTHER KING, JR. BOULEVARD ON THE NORTH, ALAMEDA STREET ON THE EAST, EAST 41ST STREET ON THE SOUTH AND LONG BEACH AVENUE ON THE WEST
LOS ANGELES, CALIFORNIA 90058

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March 2011
File No. 01211039.01

This Soil Vapor Survey Report dated March 2011, for the Horowitz Property, a two city block area bounded by Martin Luther King, Jr. Boulevard, Alameda Street, East 41st Street, and Long Beach Avenue, Los Angeles, California, was prepared and reviewed by the following:

Paola Gomez-Birenbaum, G.I.T.
Project Geologist

Kevin W. Green, REA, PG
Project Director
SCS ENGINEERS

Table of Contents

Section		Page
DISCLAIMER		ii
1	INTRODUCTION	1
	Background	1
2	GEOLOGIC AND HYDROGEOLOGIC CONDITIONS	2
	Physiographic Setting	2
	Geology and Soils	2
	Groundwater	2
3	SITE INVESTIGATION	2
	Objectives	2
	Soil Vapor Sample Collection	3
4	ANALYTICAL RESULTS	3
5	REGULATORY LIMITS	4
6	SUMMARY AND FINDINGS	4
7	REFERENCES	5

List of Figures & Appendices

Figures

1 Project Site Location
2 Sample Locations and PCE in Vapor (ug/L) at 5 feet bgs

Appendix

A H&P Laboratory Report

DISCLAIMER

This report has been prepared specifically for the Missme.com, Inc., with specific application to the investigation of soil vapor at the Horowitz Property, a two-city-block area bounded by Martin Luther King, Jr. Boulevard, Alameda Street, East 41st Street, and Long Beach Avenue in Los Angeles, California. The report has been prepared in accordance with the care and skill generally exercised by reputable professionals, under similar circumstances, in this or similar localities. No other warranty, expressed or implied, is made as to the professional opinions presented herein. No other party, known or unknown to SCS, is intended as a beneficiary of this work product, its content or information embedded therein. Third parties use this report at their own risk.

Changes in site use and conditions may occur due to variation in rainfall, temperature, water usage, or other factors. Additional information that was not available to the consultant at the time of this investigation or changes that may occur on the site or in the surrounding area may result in modification to the site that would impact the summary and recommendations presented herein. This report is not a legal opinion.

1 INTRODUCTION

SCS Engineers (SCS) was retained by Missme.com, Inc. to conduct a soil vapor survey of the Horowitz Property, a two-city-block area bounded by Martin Luther King, Jr. Boulevard, Alameda Street, East 41st Street, and Long Beach Avenue in Los Angeles, California ("the Property"). A site location map showing the general location of the Property and surrounding area is provided as **Figure 1**. Investigation activities were conducted in accordance with SCS's proposal dated February 11, 2011.

BACKGROUND

A Phase I Environmental Assessment (Phase I) report dated February 2011 was prepared by SCS for the Property. The results of the Phase I indicated that the area around the Property was only sparsely developed in 1900. However, by 1920, the Property had been subdivided into approximately 100 lots. Eighty-nine of these lots were vacant or solely residential. Another 5 lots were developed with stores and residences. The remaining six lots were developed with industrial or light manufacturing businesses. Industrialization of the Property increased gradually until, by 1970, only seven residential lots remained with the bulk of the Property being devoted to commercial and industrial enterprises. Between 1986 and 1989, most of the buildings on the southern half of the Property were demolished. By 1994, all of the buildings on the Property had been demolished and the Property had been divided into small farm plots. In 2006, the Property was graded and has remained undeveloped since that time.

Historical parcel uses of potential environmental concern include Los Angeles Furniture Factory (later Los Angeles Period Furniture Company) (at its greatest extent, occupied all of the northern half of the Property and a portion of the southern half), City Refrigerator and Fixture Company (1842 40th Place/4051 Alameda), Rug Cleaner (4014 Long Beach Avenue), a service station (4050 Long Beach Avenue), Utility Trailer Sales/Utility Truck Sales/Universal Truck Body (4073 Alameda), Laxman Manufacturing Company (1815 40th Place), Eastside Pattern & Foundry Company (1707 41st Street), Lita Chair Manufacturing Company (1709 41st Street), Whiteson Color & Chemical Company (1733 41st Street), Carlson Tool & Die Works (1739 41st Street), Precision Casting Inc. (1763 41st Street), Powers & Jones Metal Works (1773 41st Street), and Metal Products Engineering, Inc. (4000 Long Beach Avenue).

At least five phases of environmental soil investigation had been conducted on the Property with testing for total petroleum hydrocarbons (TPH), volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), metals, hexavalent chromium, organochlorine pesticides, polychlorinated biphenyls (PCBs) and herbicides. No significant concentrations were detected for most of these chemicals of potential concern.

However, elevated concentrations of certain metals were detected in a limited number of samples, but in no discernable pattern. A limited risk assessment addressed the "elevated" arsenic concentrations and concluded that the risk from arsenic did not require remediation or mitigation measures beyond what would normally be appropriate for construction sites. It has been further concluded that additional characterization of soil for metals may be warranted if the Property were to be used for residential purposes, or soils were to be removed from the Property.

In addition, low concentrations of VOCs were identified in scattered soil samples in earlier investigations. No soil vapor assessment has been conducted on the Property to date. Consequently, it is not clear whether these VOC detections resulted from small release incidents or are indicative of a wider, more significant problem. A comprehensive Property-wide soil vapor assessment was recommended.

2 GEOLOGIC AND HYDROGEOLOGIC CONDITIONS

PHYSIOGRAPHIC SETTING

According to the U.S. Geological Survey (USGS), Los Angeles (1966, photo revised 1994), California 7.5-minute topographic map, the Property is located in the central portion of the Los Angeles Coastal Plain at an elevation of approximately 210 feet above mean sea level. Site topography is generally flat with a slight regional slope to the south.

GEOLOGY AND SOILS

The Property lies within the Peninsular Ranges Geologic Province of California. This geomorphic province is traversed by a group of northwest trending sub-parallel fault cones and encompasses an area that extends 125 miles from the Transverse Ranges and the Los Angeles Basin to the Mexican border and beyond another 775 miles to the tip of Baja California. Rocks within the Peninsular Range Province were emplace during the Cretaceous age orogenic events and uplifted into the present mountain ranges during the Tertiary and Quaternary. Igneous, metamorphic, and sedimentary rocks are all found within the Peninsular Ranges. The area is seismically active, with several known active faults crossing the Province.

Based on geologic maps of the region, the Property appears to be underlain by Holocene-age alluvial fan deposits consisting of loose to medium dense sand, silt, and gravel. No faults are mapped beneath the Property and the Property is not located within an Alquist-Priolo Fault Zone.

GROUNDWATER

According to the Water Quality Control Plan for the Los Angeles Basin (1994), groundwater within the Los Angeles Coastal Plain has existing beneficial uses for municipal, agricultural, and industrial service/process. Based on regional groundwater information for the area, historical high levels of groundwater beneath the Property are estimated at 75 to 80 feet below ground surface (bgs) with anticipated regional flow direction to the southeast and/or southwest.

3 SITE INVESTIGATION

OBJECTIVES

On February 24, 2011, SCS conducted an investigation consisting of collection and analysis of soil vapor samples. As required by law, SCS contacted Underground Service Alert prior to conducting any subsurface work (Dig Alert No. B010480100). In addition, Goldak Inc. of

Glendale, California conducted a geophysical survey to clear boring locations of underground utilities and other obstructions. **Figure 2** shows the locations of the soil vapor samples collected on the Property.

The SCS investigation consisted of collecting soil vapor samples at 14 locations throughout the Property. Drilling was conducted using a direct-push truck-mounted rig operated by H&P Mobile Geochemistry (H&P) of Carlsbad, California.

SOIL VAPOR SAMPLE COLLECTION

Under the direction of SCS, H&P installed soil vapor probes at a depth of 5 feet bgs at 14 locations (SV1 through SV14) in an array throughout the Property, as shown in **Figure 2**. Soil vapor probes were also installed at a depth of 15 feet bgs at SV2 and SV9. Soil vapor samples were collected from the probes for analysis of VOCs.

Soil vapor probes were installed using a direct-push drill rig. Stainless steel rods were advanced to the deepest target depth. The steel rods were retracted from each boring and new (clean) 1/8-inch diameter Nylaflow tubing, with a polypropylene filter placed on the bottom end, was inserted to the desired depth. Clean #2/12 Monterey sand was placed in a 1-foot vertical interval around each filter. A bentonite seal was placed above the sand pack for each probe. Sampling was conducted in general accordance with the soil gas advisory dated January 28, 2003, prepared by Department of Toxic Substances Control and Los Angeles Regional Water Quality Control Board. Following a minimum of 30 minutes after the probes were set, vapor samples were extracted using a gas-sampling syringe. Prior to sampling, a leak-check compound was exposed at the surface and the tubing was purged to remove ambient air from the sampling system and to ensure that the collected soil vapor sample was representative of soil conditions.

Soil vapor samples were analyzed for VOCs using EPA Method 8260B in an on-site mobile laboratory provided by H&P. H&P is certified by the California Department of Health Services to conduct the specified analysis.

After all samples had been collected and the soil vapor analysis completed, the vapor probes were removed and the borings were covered with soil to match the surrounding land surface.

4 ANALYTICAL RESULTS

The H&P laboratory report, chain-of-custody documentation and quality assurance/control (QA/QC) data are provided in **Appendix A**. A summary of the analytical results is provided in **Table 1**.

As shown in **Table 1**, four VOCs were detected during the investigation. Tetrachloroethene (PCE) was detected in 10 of 14 samples collected from a depth of 5 feet at concentrations between 0.10 and 2.4 micrograms per liter (µg/L). Both of the 15-foot vapor samples contained slightly higher concentrations of PCE than their corresponding 5-foot samples (SV2-15 at 2.4 µg/L and SV9-15 at 1.4 µg/L). Trichlorofluoromethane (also known as Freon 11) was detected in three samples at concentrations between 0.51 and 0.67 µg/L. Ethylbenzene and m & p-

xylenes were detected in SV9-15', in the area of the former service station, at concentrations of 0.66 and 0.58 µg/L, respectively.

5 REGULATORY LIMITS

The California EPA Office of Environmental Health Hazard Assessment (OEHHA) published the *Human-Exposure-Based Screening Numbers Developed to Aid Estimation of Cleanup Costs for Contaminated Soil*, dated November 2004, revised January 2005. Within this document, California Human Health Screening Levels, or CHHSLs, were developed for certain VOCs in soil gas at 5 feet below buildings for vapor intrusion into structures under residential and industrial/commercial land use scenarios. The CHHSLs are based on general assumptions regarding soils and buildings at VOC-impacted sites, the chemical characteristics of various VOCs, and potential health risks. The OEHHA guidance states that CHHSLs are "useful to get a general understanding of potential problems with a site, but cannot be used to assess actual health risks." Further, OEHHA has stated that CHHSLs have "no regulatory effect, and have been published solely as a reference value that may be used by citizen groups, community organizations, property owners, developers, and local government officials to estimate the degree of effort that may be necessary to remediate a property."

The VOCs detected in vapor samples collected from the Property may be compared to the CHHSLs (if any) listed at the bottom of **Table 1**. Of the samples collected at 5 feet bgs, two contained PCE (SV2-5' and SV6-5') above its commercial/industrial CHHSL of 0.603 µg/L. The remaining concentrations of PCE and other VOCs were below their respective commercial/industrial CHHSLs, if any.

6 SUMMARY AND FINDINGS

On February 24, 2011, SCS conducted a soil vapor survey at the Horowitz Property, a two-city-block area bounded by Martin Luther King, Jr. Boulevard, Alameda Street, East 41st Street, and Long Beach Avenue in Los Angeles, California. The investigation consisted of collection and analysis of soil vapor samples at 5 feet bgs at 14 locations throughout the Property and at 15 feet bgs at two locations.

The results of the soil vapor survey appear consistent with the results of previous soil investigations, that is, trace concentrations of VOCs were detected, primarily in the northwestern portion of the Property. The VOC vapor concentrations were, for the most part, less than generally accepted regulatory limits (CHHSLs) for commercial/industrial land use. Based on our experience with similar sites, there is no evidence of a significant release or significant vapor intrusion risk based on a continued use of the Property for commercial or industrial purposes.

However, there has been no regulatory involvement or oversight of the investigations to date. The soil vapor data from two sampling points indicates slightly increasing VOC concentrations with depth. There is a possibility that regulatory agencies, upon review of this report, would require further investigation to confirm findings of this investigation and the vertical extent of VOCs in soil. In addition, if the Property is to be developed for residential use, additional investigation or a health risk assessment may be warranted.

7 REFERENCES

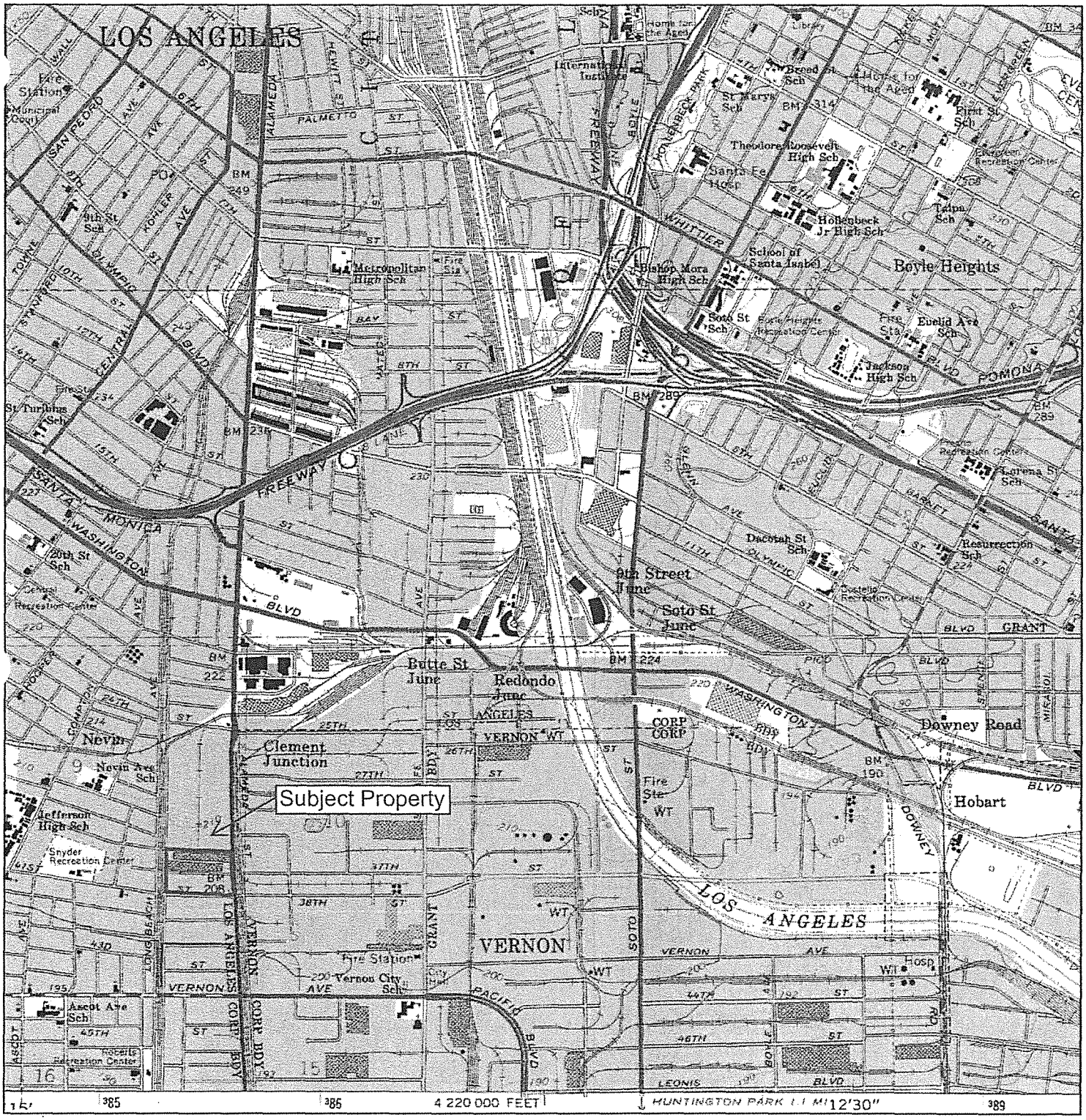
California Department of Water Resources. *Planned Utilization of the Ground Water Basins of the Coastal Plain of Los Angeles County.* Bulletin No. 104. Reprinted April 1988.

Office of Environmental Health Hazard Assessment, *Use of California Human Health Screening Levels (CHHSLs) in Evaluation of Contaminated Properties*, November 2004 (Revised January 2005)

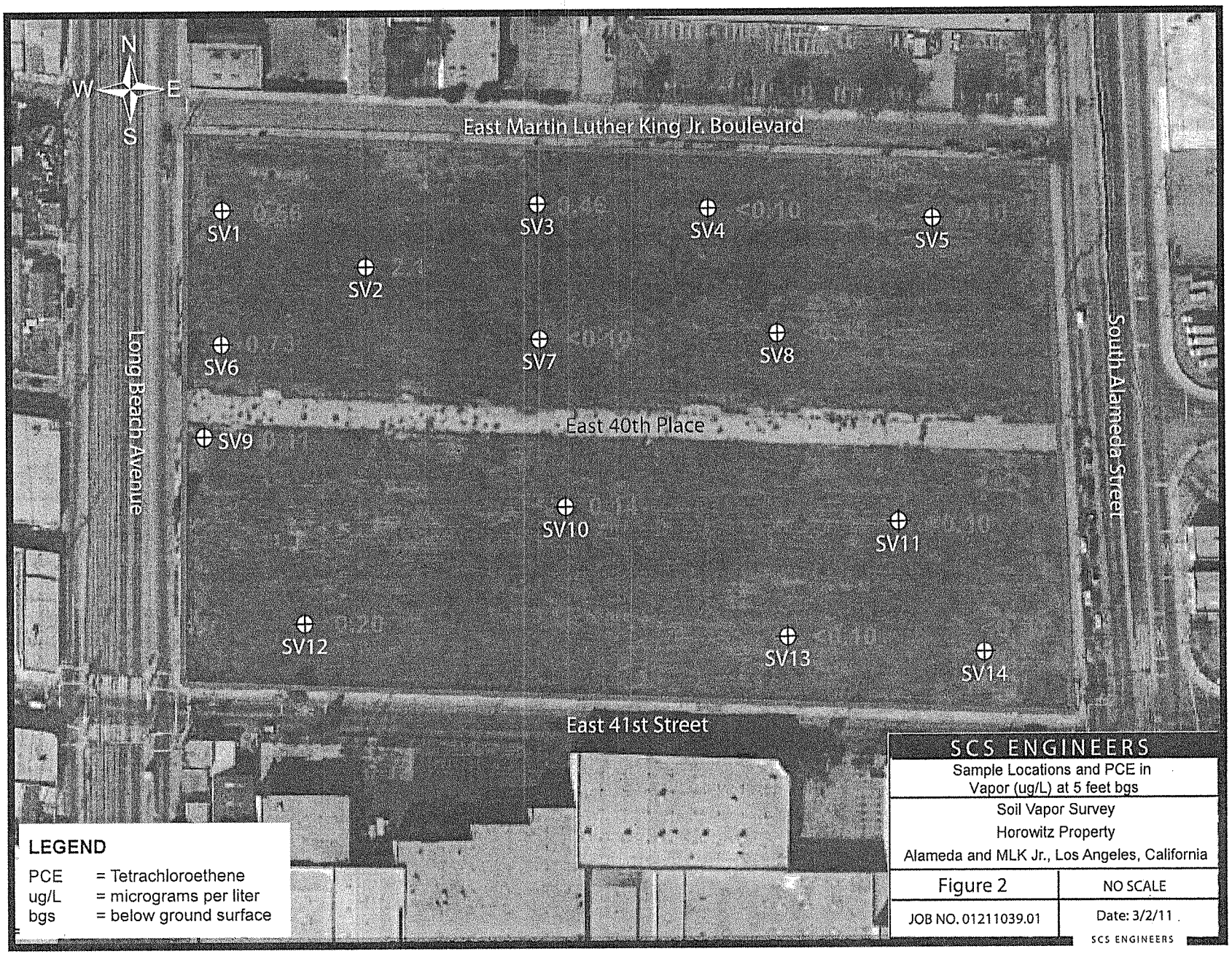
SCS Engineers, *Phase I Environmental Assessment, Horowitz Property, Two City Blocks Bounded By Martin Luther King, Jr. Boulevard on the North, Alameda Street on the East, East 41st Street on the South, and Long Beach Avenue on the West, Los Angeles, California 90058.* File No. 01211039.00. February 2011.

United States Geological Survey, Los Angeles, CA 7.5 Minute Topographic Map, 1966 (Photo revised 1994).

FIGURES 1 AND 2



N	TARGET QUAD NAME: LOS ANGELES MAP YEAR: 1994 REVISED: 1966 SERIES: 7.5 SCALE: 1:24000	SITE NAME: Horowitz Property ADDRESS: 1721 E 40th Pl Los Angeles, CA 90058 LAT/LONG: 34.0089 / -118.2413	FIGURE 1. Subject Property Location


N
W
E
S
East Martin Luther King Jr. Boulevard
SV1
SV2
SV3
SV4
SV5
SV6
SV7
SV8
SV9
SV10
SV11
SV12
SV13
SV14
Long Beach Avenue
South Alameda Street
East 40th Place
East 41st Street
LEGEND
PCE = Tetrachloroethene
ug/L = micrograms per liter
bgs = below ground surface
SCS ENGINEERS
Sample Locations and PCE in Vapor (ug/L) at 5 feet bgs
Soil Vapor Survey
Horowitz Property
Alameda and MLK Jr., Los Angeles, California
Figure 2
NO SCALE
JOB NO. 01211039.01
Date: 3/2/11
SCS ENGINEERS

APPENDIX A

H&P LABORATORY REPORT

24 February 2011

Mr. Kevin Green
SCS Engineers - Long Beach
3900 Kilroy Airport Way, Suite 100
Long Beach, CA 90806-6816

H&P Project: SCS022411-SB1
Client Project: 01211039.01

Dear Mr. Kevin Green:

Enclosed is the analytical report for the above referenced project. The data herein applies to samples as received by H&P Mobile Geochemistry, Inc. on 24-Feb-11 which were analyzed in accordance with the attached Chain of Custody record(s).

The results for all sample analyses and required QA/QC analyses are presented in the following sections and summarized in the documents:

- Sample Summary
- Case Narrative (if applicable)
- Sample Results
- Quality Control Summary
- Notes and Definitions / Appendix
- Chain of Custody

Unless otherwise noted, all analyses were performed and reviewed in compliance with our Quality Systems Manual and Standard Operating Procedures. This report shall not be reproduced, except in full, without the written approval of H&P Mobile Geochemistry, Inc.

We at H&P Mobile Geochemistry, Inc. sincerely appreciate the opportunity to provide analytical services to you on this project. If you have any questions or concerns regarding this analytical report, please contact me at your convenience at 760-804-9678.

Sincerely,

Janis Villarreal
Laboratory Director

H&P Mobile Geochemistry, Inc. operates under CA Environmental Lab Accreditation Program Numbers 2579, 2740, 2741, 2742, 2743, 2745 and 2754. National Environmental Laboratory Accreditation Conference (NELAC) Standards Lab #11845

Mobile Geochemistry Inc.

2470 Impala Drive
Carlsbad, CA 92010
760-804-9678 Phone
760-804-9159 Fax

SCS Engineers - Long Beach	Project: SCS022411-SB1	
3900 Kilroy Airport Way, Suite 100	Project Number: 01211039.01	Reported:
Long Beach, CA 90806-6816	Project Manager: Mr. Kevin Green	24-Feb-11 17:05

ANALYTICAL REPORT FOR SAMPLES

Sample ID	Laboratory ID	Matrix	Date Sampled	Date Received
DRAFT: SV9-5', 1PV, P111cc	E102085-01	Vapor	24-Feb-11	24-Feb-11
DRAFT: SV9-5', 3PV, P333cc	E102085-02	Vapor	24-Feb-11	24-Feb-11
DRAFT: SV9-5', 7PV, P777cc	E102085-03	Vapor	24-Feb-11	24-Feb-11
DRAFT: SV6-5', P333cc	E102085-04	Vapor	24-Feb-11	24-Feb-11
DRAFT: SV9-15', P363cc	E102085-05	Vapor	24-Feb-11	24-Feb-11
DRAFT: SV1-5', P333cc	E102085-06	Vapor	24-Feb-11	24-Feb-11
DRAFT: SV2-5', P333cc	E102085-07	Vapor	24-Feb-11	24-Feb-11
DRAFT: SV2-5' Dup, P383cc	E102085-08	Vapor	24-Feb-11	24-Feb-11
DRAFT: SV3-5', P333cc	E102085-09	Vapor	24-Feb-11	24-Feb-11
DRAFT: SV4-5', P333cc	E102085-10	Vapor	24-Feb-11	24-Feb-11
DRAFT: SV5-5', P333cc	E102085-11	Vapor	24-Feb-11	24-Feb-11
DRAFT: SV7-5', P333cc	E102085-12	Vapor	24-Feb-11	24-Feb-11
DRAFT: SV8-5', P333cc	E102085-13	Vapor	24-Feb-11	24-Feb-11
DRAFT: SV10-5', P333cc	E102085-14	Vapor	24-Feb-11	24-Feb-11
DRAFT: SV11-5', P333cc	E102085-15	Vapor	24-Feb-11	24-Feb-11
DRAFT: SV13-5', P333cc	E102085-16	Vapor	24-Feb-11	24-Feb-11
DRAFT: SV14-5', P333cc	E102085-17	Vapor	24-Feb-11	24-Feb-11
DRAFT: SV12-5', P333cc	E102085-18	Vapor	24-Feb-11	24-Feb-11
DRAFT: SV2-15', P363cc	E102085-19	Vapor	24-Feb-11	24-Feb-11

H&P Mobile Geochemistry Inc.

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SCS Engineers - Long Beach	Project: SCS022411-SB1	
3900 Kilroy Airport Way, Suite 100	Project Number: 01211039.01	Reported:
Long Beach, CA 90806-6816	Project Manager: Mr. Kevin Green	24-Feb-11 17:05

DRAFT: Volatile Organic Compounds by EPA Method 8260B Modified

H&P Mobile Geochemistry, Inc.

Analyte	Result	Reporting Limit	Units	Dilution Factor	Batch	Prepared	Analyzed	Method	Notes
DRAFT: SV9-5', 1PV, P111cc (E102085-01) Vapor Sampled: 24-Feb-11 Received: 24-Feb-11									
1,1-Difluoroethane (LCC)	ND	10	ug/l	0.04	EB12406	24-Feb-11	24-Feb-11	EPA 8260B	
Dichlorodifluoromethane (F12)	ND	0.50	"	"	"	"	"	"	
Vinyl chloride	ND	0.04	"	"	"	"	"	"	
Chloroethane	ND	0.50	"	"	"	"	"	"	
Trichlorofluoromethane (F11)	ND	0.50	"	"	"	"	"	"	
1,1-Dichloroethene	ND	0.50	"	"	"	"	"	"	
Methylene chloride (Dichloromethane)	ND	0.50	"	"	"	"	"	"	
1,1,2 Trichlorotrifluoroethane (F113)	ND	0.50	"	"	"	"	"	"	
trans-1,2-Dichloroethene	ND	0.50	"	"	"	"	"	"	
1,1-Dichloroethane	ND	0.50	"	"	"	"	"	"	
cis-1,2-Dichloroethene	ND	0.50	"	"	"	"	"	"	
Chloroform	ND	0.10	"	"	"	"	"	"	
1,1,1-Trichloroethane	ND	0.50	"	"	"	"	"	"	
Carbon tetrachloride	ND	0.08	"	"	"	"	"	"	
1,2-Dichloroethane (EDC)	ND	0.10	"	"	"	"	"	"	
Benzene	ND	0.10	"	"	"	"	"	"	
Trichloroethene	ND	0.10	"	"	"	"	"	"	
Toluene	ND	1.0	"	"	"	"	"	"	
1,1,2-Trichloroethane	ND	0.50	"	"	"	"	"	"	
Tetrachloroethene	ND	0.10	"	"	"	"	"	"	
Ethylbenzene	ND	0.50	"	"	"	"	"	"	
1,1,1,2-Tetrachloroethane	ND	0.50	"	"	"	"	"	"	
m,p-Xylene	ND	0.50	"	"	"	"	"	"	
o-Xylene	ND	0.50	"	"	"	"	"	"	
1,1,2,2-Tetrachloroethane	ND	0.50	"	"	"	"	"	"	
Surrogate: Dibromofluoromethane		*116 %*		*75-125*	"	"	"	"	
Surrogate: 1,2-Dichloroethane-d4		*116 %*		*75-125*	"	"	"	"	
Surrogate: Toluene-d8		*103 %*		*75-125*	"	"	"	"	

H&P Mobile Geochemistry Inc.

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Long Beach, CA 90806-6816	Project Manager: Mr. Kevin Green	24-Feb-11 17:05

DRAFT: Volatile Organic Compounds by EPA Method 8260B Modified

H&P Mobile Geochemistry, Inc.

Analyte	Result	Reporting Limit	Units	Dilution Factor	Batch	Prepared	Analyzed	Method	Notes
DRAFT: SV9-5', 3PV, P333cc (E102085-02) Vapor	**Sampled: 24-Feb-11**	**Received: 24-Feb-11**							
1,1-Difluoroethane (LCC)	ND	10	ug/l	0.04	EB12406	24-Feb-11	24-Feb-11	EPA 8260B	
Dichlorodifluoromethane (F12)	ND	0.50	"	"	"	"	"	"	
Vinyl chloride	ND	0.04	"	"	"	"	"	"	
Chloroethane	ND	0.50	"	"	"	"	"	"	
Trichlorofluoromethane (F11)	ND	0.50	"	"	"	"	"	"	
1,1-Dichloroethene	ND	0.50	"	"	"	"	"	"	
Methylene chloride (Dichloromethane)	ND	0.50	"	"	"	"	"	"	
1,1,2 Trichlorotrifluoroethane (F113)	ND	0.50	"	"	"	"	"	"	
trans-1,2-Dichloroethene	ND	0.50	"	"	"	"	"	"	
1,1-Dichloroethane	ND	0.50	"	"	"	"	"	"	
cis-1,2-Dichloroethene	ND	0.50	"	"	"	"	"	"	
Chloroform	ND	0.10	"	"	"	"	"	"	
1,1,1-Trichloroethane	ND	0.50	"	"	"	"	"	"	
Carbon tetrachloride	ND	0.08	"	"	"	"	"	"	
1,2-Dichloroethane (EDC)	ND	0.10	"	"	"	"	"	"	
Benzene	ND	0.10	"	"	"	"	"	"	
Trichloroethene	ND	0.10	"	"	"	"	"	"	
Toluene	ND	1.0	"	"	"	"	"	"	
1,1,2-Trichloroethane	ND	0.50	"	"	"	"	"	"	
Tetrachloroethene	**0.11**	0.10	"	"	"	"	"	"	
Ethylbenzene	ND	0.50	"	"	"	"	"	"	
1,1,1,2-Tetrachloroethane	ND	0.50	"	"	"	"	"	"	
m,p-Xylene	ND	0.50	"	"	"	"	"	"	
o-Xylene	ND	0.50	"	"	"	"	"	"	
1,1,2,2-Tetrachloroethane	ND	0.50	"	"	"	"	"	"	
Surrogate: Dibromofluoromethane		*117 %*		*75-125*	"	"	"	"	
Surrogate: 1,2-Dichloroethane-d4		*98.2 %*		*75-125*	"	"	"	"	
Surrogate: Toluene-d8		*102 %*		*75-125*	"	"	"	"	

H&P Mobile Geochemistry Inc.

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SCS Engineers - Long Beach	Project: SCS022411-SB1	
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DRAFT: Volatile Organic Compounds by EPA Method 8260B Modified

H&P Mobile Geochemistry, Inc.

Analyte	Result	Reporting Limit	Units	Dilution Factor	Batch	Prepared	Analyzed	Method	Notes
DRAFT: SV9-5', 7PV, P777cc (E102085-03) Vapor	**Sampled: 24-Feb-11**	**Received: 24-Feb-11**							
1,1-Difluoroethane (LCC)	ND	10	ug/l	0.04	EB12406	24-Feb-11	24-Feb-11	EPA 8260B	
Dichlorodifluoromethane (F12)	ND	0.50	"	"	"	"	"	"	
Vinyl chloride	ND	0.04	"	"	"	"	"	"	
Chloroethane	ND	0.50	"	"	"	"	"	"	
Trichlorofluoromethane (F11)	ND	0.50	"	"	"	"	"	"	
1,1-Dichloroethene	ND	0.50	"	"	"	"	"	"	
Methylene chloride (Dichloromethane)	ND	0.50	"	"	"	"	"	"	
1,1,2 Trichlorotrifluoroethane (F113)	ND	0.50	"	"	"	"	"	"	
trans-1,2-Dichloroethene	ND	0.50	"	"	"	"	"	"	
1,1-Dichloroethane	ND	0.50	"	"	"	"	"	"	
cis-1,2-Dichloroethene	ND	0.50	"	"	"	"	"	"	
Chloroform	ND	0.10	"	"	"	"	"	"	
1,1,1-Trichloroethane	ND	0.50	"	"	"	"	"	"	
Carbon tetrachloride	ND	0.08	"	"	"	"	"	"	
1,2-Dichloroethane (EDC)	ND	0.10	"	"	"	"	"	"	
Benzene	ND	0.10	"	"	"	"	"	"	
Trichloroethene	ND	0.10	"	"	"	"	"	"	
Toluene	ND	1.0	"	"	"	"	"	"	
1,1,2-Trichloroethane	ND	0.50	"	"	"	"	"	"	
Tetrachloroethene	ND	0.10	"	"	"	"	"	"	
Ethylbenzene	ND	0.50	"	"	"	"	"	"	
1,1,1,2-Tetrachloroethane	ND	0.50	"	"	"	"	"	"	
m,p-Xylene	ND	0.50	"	"	"	"	"	"	
o-Xylene	ND	0.50	"	"	"	"	"	"	
1,1,2,2-Tetrachloroethane	ND	0.50	"	"	"	"	"	"	
Surrogate: Dibromofluoromethane		*108 %*	*75-125*		"	"	"	"	
Surrogate: 1,2-Dichloroethane-d4		*110 %*	*75-125*		"	"	"	"	
Surrogate: Toluene-d8		*104 %*	*75-125*		"	"	"	"	

H&P Mobile Geochemistry Inc.

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SCS Engineers - Long Beach	Project: SCS022411-SB1	
3900 Kilroy Airport Way, Suite 100	Project Number: 01211039.01	Reported:
Long Beach, CA 90806-6816	Project Manager: Mr. Kevin Green	24-Feb-11 17:05

DRAFT: Volatile Organic Compounds by EPA Method 8260B Modified

H&P Mobile Geochemistry, Inc.

Analyte	Result	Reporting Limit	Units	Dilution Factor	Batch	Prepared	Analyzed	Method	Notes
DRAFT: SV6-5', P333cc (E102085-04) Vapor	**Sampled: 24-Feb-11**	**Received: 24-Feb-11**							
1,1-Difluoroethane (LCC)	ND	10	ug/l	0.04	EB12406	24-Feb-11	24-Feb-11	EPA 8260B	
Dichlorodifluoromethane (F12)	ND	0.50	"	"	"	"	"	"	
Vinyl chloride	ND	0.04	"	"	"	"	"	"	
Chloroethane	ND	0.50	"	"	"	"	"	"	
Trichlorofluoromethane (F11)	ND	0.50	"	"	"	"	"	"	
1,1-Dichloroethene	ND	0.50	"	"	"	"	"	"	
Methylene chloride (Dichloromethane)	ND	0.50	"	"	"	"	"	"	
1,1,2 Trichlorotrifluoroethane (F113)	ND	0.50	"	"	"	"	"	"	
trans-1,2-Dichloroethene	ND	0.50	"	"	"	"	"	"	
1,1-Dichloroethane	ND	0.50	"	"	"	"	"	"	
cis-1,2-Dichloroethene	ND	0.50	"	"	"	"	"	"	
Chloroform	ND	0.10	"	"	"	"	"	"	
1,1,1-Trichloroethane	ND	0.50	"	"	"	"	"	"	
Carbon tetrachloride	ND	0.08	"	"	"	"	"	"	
1,2-Dichloroethane (EDC)	ND	0.10	"	"	"	"	"	"	
Benzene	ND	0.10	"	"	"	"	"	"	
Trichloroethene	ND	0.10	"	"	"	"	"	"	
Toluene	ND	1.0	"	"	"	"	"	"	
1,1,2-Trichloroethane	ND	0.50	"	"	"	"	"	"	
Tetrachloroethene	**0.73**	0.10	"	"	"	"	"	"	
Ethylbenzene	ND	0.50	"	"	"	"	"	"	
1,1,1,2-Tetrachloroethane	ND	0.50	"	"	"	"	"	"	
m,p-Xylene	ND	0.50	"	"	"	"	"	"	
o-Xylene	ND	0.50	"	"	"	"	"	"	
1,1,2,2-Tetrachloroethane	ND	0.50	"	"	"	"	"	"	
Surrogate: Dibromofluoromethane		*111 %*		*75-125*	"	"	"	"	
Surrogate: 1,2-Dichloroethane-d4		*107 %*		*75-125*	"	"	"	"	
Surrogate: Toluene-d8		*107 %*		*75-125*	"	"	"	"	

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SCS Engineers - Long Beach	Project: SCS022411-SB1	
3900 Kilroy Airport Way, Suite 100	Project Number: 01211039.01	Reported:
Long Beach, CA 90806-6816	Project Manager: Mr. Kevin Green	24-Feb-11 17:05

DRAFT: Volatile Organic Compounds by EPA Method 8260B Modified

H&P Mobile Geochemistry, Inc.

Analyte	Result	Reporting Limit	Units	Dilution Factor	Batch	Prepared	Analyzed	Method	Notes
DRAFT: SV9-15', P363cc (E102085-05) Vapor Sampled: 24-Feb-11 Received: 24-Feb-11									
1,1-Difluoroethane (LCC)	ND	10	ug/l	0.04	EB12406	24-Feb-11	24-Feb-11	EPA 8260B	
Dichlorodifluoromethane (F12)	ND	0.50	"	"	"	"	"	"	
Vinyl chloride	ND	0.04	"	"	"	"	"	"	
Chloroethane	ND	0.50	"	"	"	"	"	"	
Trichlorofluoromethane (F11)	ND	0.50	"	"	"	"	"	"	
1,1-Dichloroethene	ND	0.50	"	"	"	"	"	"	
Methylene chloride (Dichloromethane)	ND	0.50	"	"	"	"	"	"	
1,1,2 Trichlorotrifluoroethane (F113)	ND	0.50	"	"	"	"	"	"	
trans-1,2-Dichloroethene	ND	0.50	"	"	"	"	"	"	
1,1-Dichloroethane	ND	0.50	"	"	"	"	"	"	
cis-1,2-Dichloroethene	ND	0.50	"	"	"	"	"	"	
Chloroform	ND	0.10	"	"	"	"	"	"	
1,1,1-Trichloroethane	ND	0.50	"	"	"	"	"	"	
Carbon tetrachloride	ND	0.08	"	"	"	"	"	"	
1,2-Dichloroethane (EDC)	ND	0.10	"	"	"	"	"	"	
Benzene	ND	0.10	"	"	"	"	"	"	
Trichloroethene	ND	0.10	"	"	"	"	"	"	
Toluene	ND	1.0	"	"	"	"	"	"	
1,1,2-Trichloroethane	ND	0.50	"	"	"	"	"	"	
Tetrachloroethene	**1.4**	0.10	"	"	"	"	"	"	
Ethylbenzene	**0.66**	0.50	"	"	"	"	"	"	
1,1,1,2-Tetrachloroethane	ND	0.50	"	"	"	"	"	"	
m,p-Xylene	**0.58**	0.50	"	"	"	"	"	"	
o-Xylene	ND	0.50	"	"	"	"	"	"	
1,1,2,2-Tetrachloroethane	ND	0.50	"	"	"	"	"	"	
Surrogate: Dibromofluoromethane		*109 %*		*75-125*	"	"	"	"	
Surrogate: 1,2-Dichloroethane-d4		*110 %*		*75-125*	"	"	"	"	
Surrogate: Toluene-d8		*104 %*		*75-125*	"	"	"	"	

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SCS Engineers - Long Beach	Project: SCS022411-SB1	
3900 Kilroy Airport Way, Suite 100	Project Number: 01211039.01	Reported:
Long Beach, CA 90806-6816	Project Manager: Mr. Kevin Green	24-Feb-11 17:05

DRAFT: Volatile Organic Compounds by EPA Method 8260B Modified

H&P Mobile Geochemistry, Inc.

Analyte	Result	Reporting Limit	Units	Dilution Factor	Batch	Prepared	Analyzed	Method	Notes
DRAFT: SV1-5', P333cc (E102085-06) Vapor Sampled: 24-Feb-11 Received: 24-Feb-11									
1,1-Difluoroethane (LCC)	ND	10	ug/l	0.04	EB12406	24-Feb-11	24-Feb-11	EPA 8260B	
Dichlorodifluoromethane (F12)	ND	0.50	"	"	"	"	"	"	
Vinyl chloride	ND	0.04	"	"	"	"	"	"	
Chloroethane	ND	0.50	"	"	"	"	"	"	
Trichlorofluoromethane (F11)	ND	0.50	"	"	"	"	"	"	
1,1-Dichloroethene	ND	0.50	"	"	"	"	"	"	
Methylene chloride (Dichloromethane)	ND	0.50	"	"	"	"	"	"	
1,1,2 Trichlorotrifluoroethane (F113)	ND	0.50	"	"	"	"	"	"	
trans-1,2-Dichloroethene	ND	0.50	"	"	"	"	"	"	
1,1-Dichloroethane	ND	0.50	"	"	"	"	"	"	
cis-1,2-Dichloroethene	ND	0.50	"	"	"	"	"	"	
Chloroform	ND	0.10	"	"	"	"	"	"	
1,1,1-Trichloroethane	ND	0.50	"	"	"	"	"	"	
Carbon tetrachloride	ND	0.08	"	"	"	"	"	"	
1,2-Dichloroethane (EDC)	ND	0.10	"	"	"	"	"	"	
Benzene	ND	0.10	"	"	"	"	"	"	
Trichloroethene	ND	0.10	"	"	"	"	"	"	
Toluene	ND	1.0	"	"	"	"	"	"	
1,1,2-Trichloroethane	ND	0.50	"	"	"	"	"	"	
Tetrachloroethene	**0.56**	0.10	"	"	"	"	"	"	
Ethylbenzene	ND	0.50	"	"	"	"	"	"	
1,1,1,2-Tetrachloroethane	ND	0.50	"	"	"	"	"	"	
m,p-Xylene	ND	0.50	"	"	"	"	"	"	
o-Xylene	ND	0.50	"	"	"	"	"	"	
1,1,2,2-Tetrachloroethane	ND	0.50	"	"	"	"	"	"	
Surrogate: Dibromofluoromethane		*118 %*		*75-125*	"	"	"	"	
Surrogate: 1,2-Dichloroethane-d4		*109 %*		*75-125*	"	"	"	"	
Surrogate: Toluene-d8		*106 %*		*75-125*	"	"	"	"	

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SCS Engineers - Long Beach	Project: SCS022411-SB1	
3900 Kilroy Airport Way, Suite 100	Project Number: 01211039.01	Reported:
Long Beach, CA 90806-6816	Project Manager: Mr. Kevin Green	24-Feb-11 17:05

DRAFT: Volatile Organic Compounds by EPA Method 8260B Modified

H&P Mobile Geochemistry, Inc.

Analyte	Result	Reporting Limit	Units	Dilution Factor	Batch	Prepared	Analyzed	Method	Notes
DRAFT: SV2-5', P333cc (E102085-07) Vapor	**Sampled: 24-Feb-11**	**Received: 24-Feb-11**							
1,1-Difluoroethane (LCC)	ND	10	ug/l	0.04	EB12406	24-Feb-11	24-Feb-11	EPA 8260B	
Dichlorodifluoromethane (F12)	ND	0.50	"	"	"	"	"	"	
Vinyl chloride	ND	0.04	"	"	"	"	"	"	
Chloroethane	ND	0.50	"	"	"	"	"	"	
Trichlorofluoromethane (F11)	**0.57**	0.50	"	"	"	"	"	"	
1,1-Dichloroethene	ND	0.50	"	"	"	"	"	"	
Methylene chloride (Dichloromethane)	ND	0.50	"	"	"	"	"	"	
1,1,2 Trichlorotrifluoroethane (F113)	ND	0.50	"	"	"	"	"	"	
trans-1,2-Dichloroethene	ND	0.50	"	"	"	"	"	"	
1,1-Dichloroethane	ND	0.50	"	"	"	"	"	"	
cis-1,2-Dichloroethene	ND	0.50	"	"	"	"	"	"	
Chloroform	ND	0.10	"	"	"	"	"	"	
1,1,1-Trichloroethane	ND	0.50	"	"	"	"	"	"	
Carbon tetrachloride	ND	0.08	"	"	"	"	"	"	
1,2-Dichloroethane (EDC)	ND	0.10	"	"	"	"	"	"	
Benzene	ND	0.10	"	"	"	"	"	"	
Trichloroethene	ND	0.10	"	"	"	"	"	"	
Toluene	ND	1.0	"	"	"	"	"	"	
1,1,2-Trichloroethane	ND	0.50	"	"	"	"	"	"	
Tetrachloroethene	**2.1**	0.10	"	"	"	"	"	"	
Ethylbenzene	ND	0.50	"	"	"	"	"	"	
1,1,1,2-Tetrachloroethane	ND	0.50	"	"	"	"	"	"	
m,p-Xylene	ND	0.50	"	"	"	"	"	"	
o-Xylene	ND	0.50	"	"	"	"	"	"	
1,1,2,2-Tetrachloroethane	ND	0.50	"	"	"	"	"	"	
Surrogate: Dibromofluoromethane		*113 %*		*75-125*	"	"	"	"	
Surrogate: 1,2-Dichloroethane-d4		*105 %*		*75-125*	"	"	"	"	
Surrogate: Toluene-d8		*104 %*		*75-125*	"	"	"	"	

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SCS Engineers - Long Beach	Project: SCS022411-SB1	
3900 Kilroy Airport Way, Suite 100	Project Number: 01211039.01	Reported:
Long Beach, CA 90806-6816	Project Manager: Mr. Kevin Green	24-Feb-11 17:05

DRAFT: Volatile Organic Compounds by EPA Method 8260B Modified

H&P Mobile Geochemistry, Inc.

Analyte	Result	Reporting Limit	Units	Dilution Factor	Batch	Prepared	Analyzed	Method	Notes
DRAFT: SV2-5' Dup, P383cc (E102085-08) Vapor Sampled: 24-Feb-11 Received: 24-Feb-11									
1,1-Difluoroethane (LCC)	ND	10	ug/l	0.04	EB12406	24-Feb-11	24-Feb-11	EPA 8260B	
Dichlorodifluoromethane (F12)	ND	0.50	"	"	"	"	"	"	
Vinyl chloride	ND	0.04	"	"	"	"	"	"	
Chloroethane	ND	0.50	"	"	"	"	"	"	
Trichlorofluoromethane (F11)	**0.51**	0.50	"	"	"	"	"	"	
1,1-Dichloroethene	ND	0.50	"	"	"	"	"	"	
Methylene chloride (Dichloromethane)	ND	0.50	"	"	"	"	"	"	
1,1,2 Trichlorotrifluoroethane (F113)	ND	0.50	"	"	"	"	"	"	
trans-1,2-Dichloroethene	ND	0.50	"	"	"	"	"	"	
1,1-Dichloroethane	ND	0.50	"	"	"	"	"	"	
cis-1,2-Dichloroethene	ND	0.50	"	"	"	"	"	"	
Chloroform	ND	0.10	"	"	"	"	"	"	
1,1,1-Trichloroethane	ND	0.50	"	"	"	"	"	"	
Carbon tetrachloride	ND	0.08	"	"	"	"	"	"	
1,2-Dichloroethane (EDC)	ND	0.10	"	"	"	"	"	"	
Benzene	ND	0.10	"	"	"	"	"	"	
Trichloroethene	ND	0.10	"	"	"	"	"	"	
Toluene	ND	1.0	"	"	"	"	"	"	
1,1,2-Trichloroethane	ND	0.50	"	"	"	"	"	"	
Tetrachloroethene	**1.8**	0.10	"	"	"	"	"	"	
Ethylbenzene	ND	0.50	"	"	"	"	"	"	
1,1,1,2-Tetrachloroethane	ND	0.50	"	"	"	"	"	"	
m,p-Xylene	ND	0.50	"	"	"	"	"	"	
o-Xylene	ND	0.50	"	"	"	"	"	"	
1,1,2,2-Tetrachloroethane	ND	0.50	"	"	"	"	"	"	
Surrogate: Dibromofluoromethane		*104 %*		*75-125*	"	"	"	"	
Surrogate: 1,2-Dichloroethane-d4		*102 %*		*75-125*	"	"	"	"	
Surrogate: Toluene-d8		*103 %*		*75-125*	"	"	"	"	

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SCS Engineers - Long Beach	Project: SCS022411-SB1	
3900 Kilroy Airport Way, Suite 100	Project Number: 01211039.01	Reported:
Long Beach, CA 90806-6816	Project Manager: Mr. Kevin Green	24-Feb-11 17:05

DRAFT: Volatile Organic Compounds by EPA Method 8260B Modified

H&P Mobile Geochemistry, Inc.

Analyte	Result	Reporting Limit	Units	Dilution Factor	Batch	Prepared	Analyzed	Method	Notes
DRAFT: SV3-5', P333cc (E102085-09) Vapor Sampled: 24-Feb-11 Received: 24-Feb-11									
1,1-Difluoroethane (LCC)	ND	10	ug/l	0.04	EB12406	24-Feb-11	24-Feb-11	EPA 8260B	
Dichlorodifluoromethane (F12)	ND	0.50	"	"	"	"	"	"	
Vinyl chloride	ND	0.04	"	"	"	"	"	"	
Chloroethane	ND	0.50	"	"	"	"	"	"	
Trichlorofluoromethane (F11)	ND	0.50	"	"	"	"	"	"	
1,1-Dichloroethene	ND	0.50	"	"	"	"	"	"	
Methylene chloride (Dichloromethane)	ND	0.50	"	"	"	"	"	"	
1,1,2 Trichlorotrifluoroethane (F113)	ND	0.50	"	"	"	"	"	"	
trans-1,2-Dichloroethene	ND	0.50	"	"	"	"	"	"	
1,1-Dichloroethane	ND	0.50	"	"	"	"	"	"	
cis-1,2-Dichloroethene	ND	0.50	"	"	"	"	"	"	
Chloroform	ND	0.10	"	"	"	"	"	"	
1,1,1-Trichloroethane	ND	0.50	"	"	"	"	"	"	
Carbon tetrachloride	ND	0.08	"	"	"	"	"	"	
1,2-Dichloroethane (EDC)	ND	0.10	"	"	"	"	"	"	
Benzene	ND	0.10	"	"	"	"	"	"	
Trichloroethene	ND	0.10	"	"	"	"	"	"	
Toluene	ND	1.0	"	"	"	"	"	"	
1,1,2-Trichloroethane	ND	0.50	"	"	"	"	"	"	
Tetrachloroethene	**0.46**	0.10	"	"	"	"	"	"	
Ethylbenzene	ND	0.50	"	"	"	"	"	"	
1,1,1,2-Tetrachloroethane	ND	0.50	"	"	"	"	"	"	
m,p-Xylene	ND	0.50	"	"	"	"	"	"	
o-Xylene	ND	0.50	"	"	"	"	"	"	
1,1,2,2-Tetrachloroethane	ND	0.50	"	"	"	"	"	"	
Surrogate: Dibromofluoromethane		*106 %*		*75-125*	"	"	"	"	
Surrogate: 1,2-Dichloroethane-d4		*113 %*		*75-125*	"	"	"	"	
Surrogate: Toluene-d8		*103 %*		*75-125*	"	"	"	"	

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SCS Engineers - Long Beach	Project: SCS022411-SB1	
3900 Kilroy Airport Way, Suite 100	Project Number: 01211039.01	Reported:
Long Beach, CA 90806-6816	Project Manager: Mr. Kevin Green	24-Feb-11 17:05

DRAFT: Volatile Organic Compounds by EPA Method 8260B Modified

H&P Mobile Geochemistry, Inc.

Analyte	Result	Reporting Limit	Units	Dilution Factor	Batch	Prepared	Analyzed	Method	Notes
DRAFT: SV4-5', P333cc (E102085-10) Vapor Sampled: 24-Feb-11 Received: 24-Feb-11									
1,1-Difluoroethane (LCC)	ND	10	ug/l	0.04	EB12406	24-Feb-11	24-Feb-11	EPA 8260B	
Dichlorodifluoromethane (F12)	ND	0.50	"	"	"	"	"	"	
Vinyl chloride	ND	0.04	"	"	"	"	"	"	
Chloroethane	ND	0.50	"	"	"	"	"	"	
Trichlorofluoromethane (F11)	ND	0.50	"	"	"	"	"	"	
1,1-Dichloroethene	ND	0.50	"	"	"	"	"	"	
Methylene chloride (Dichloromethane)	ND	0.50	"	"	"	"	"	"	
1,1,2 Trichlorotrifluoroethane (F113)	ND	0.50	"	"	"	"	"	"	
trans-1,2-Dichloroethene	ND	0.50	"	"	"	"	"	"	
1,1-Dichloroethane	ND	0.50	"	"	"	"	"	"	
cis-1,2-Dichloroethene	ND	0.50	"	"	"	"	"	"	
Chloroform	ND	0.10	"	"	"	"	"	"	
1,1,1-Trichloroethane	ND	0.50	"	"	"	"	"	"	
Carbon tetrachloride	ND	0.08	"	"	"	"	"	"	
1,2-Dichloroethane (EDC)	ND	0.10	"	"	"	"	"	"	
Benzene	ND	0.10	"	"	"	"	"	"	
Trichloroethene	ND	0.10	"	"	"	"	"	"	
Toluene	ND	1.0	"	"	"	"	"	"	
1,1,2-Trichloroethane	ND	0.50	"	"	"	"	"	"	
Tetrachloroethene	ND	0.10	"	"	"	"	"	"	
Ethylbenzene	ND	0.50	"	"	"	"	"	"	
1,1,1,2-Tetrachloroethane	ND	0.50	"	"	"	"	"	"	
m,p-Xylene	ND	0.50	"	"	"	"	"	"	
o-Xylene	ND	0.50	"	"	"	"	"	"	
1,1,2,2-Tetrachloroethane	ND	0.50	"	"	"	"	"	"	
Surrogate: Dibromofluoromethane		*116 %*		*75-125*	"	"	"	"	
Surrogate: 1,2-Dichloroethane-d4		*113 %*		*75-125*	"	"	"	"	
Surrogate: Toluene-d8		*107 %*		*75-125*	"	"	"	"	

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SCS Engineers - Long Beach	Project: SCS022411-SB1	
3900 Kilroy Airport Way, Suite 100	Project Number: 01211039.01	Reported:
Long Beach, CA 90806-6816	Project Manager: Mr. Kevin Green	24-Feb-11 17:05

DRAFT: Volatile Organic Compounds by EPA Method 8260B Modified

H&P Mobile Geochemistry, Inc.

Analyte	Result	Reporting Limit	Units	Dilution Factor	Batch	Prepared	Analyzed	Method	Notes
DRAFT: SV5-5', P333cc (E102085-11) Vapor Sampled: 24-Feb-11 Received: 24-Feb-11									
1,1-Difluoroethane (LCC)	ND	10	ug/l	0.04	EB12406	24-Feb-11	24-Feb-11	EPA 8260B	
Dichlorodifluoromethane (F12)	ND	0.50	"	"	"	"	"	"	
Vinyl chloride	ND	0.04	"	"	"	"	"	"	
Chloroethane	ND	0.50	"	"	"	"	"	"	
Trichlorofluoromethane (F11)	ND	0.50	"	"	"	"	"	"	
1,1-Dichloroethene	ND	0.50	"	"	"	"	"	"	
Methylene chloride (Dichloromethane)	ND	0.50	"	"	"	"	"	"	
1,1,2 Trichlorotrifluoroethane (F113)	ND	0.50	"	"	"	"	"	"	
trans-1,2-Dichloroethene	ND	0.50	"	"	"	"	"	"	
1,1-Dichloroethane	ND	0.50	"	"	"	"	"	"	
cis-1,2-Dichloroethene	ND	0.50	"	"	"	"	"	"	
Chloroform	ND	0.10	"	"	"	"	"	"	
1,1,1-Trichloroethane	ND	0.50	"	"	"	"	"	"	
Carbon tetrachloride	ND	0.08	"	"	"	"	"	"	
1,2-Dichloroethane (EDC)	ND	0.10	"	"	"	"	"	"	
Benzene	ND	0.10	"	"	"	"	"	"	
Trichloroethene	ND	0.10	"	"	"	"	"	"	
Toluene	ND	1.0	"	"	"	"	"	"	
1,1,2-Trichloroethane	ND	0.50	"	"	"	"	"	"	
Tetrachloroethene	**0.10**	0.10	"	"	"	"	"	"	
Ethylbenzene	ND	0.50	"	"	"	"	"	"	
1,1,1,2-Tetrachloroethane	ND	0.50	"	"	"	"	"	"	
m,p-Xylene	ND	0.50	"	"	"	"	"	"	
o-Xylene	ND	0.50	"	"	"	"	"	"	
1,1,2,2-Tetrachloroethane	ND	0.50	"	"	"	"	"	"	
Surrogate: Dibromofluoromethane		*112 %*	*75-125*		"	"	"	"	
Surrogate: 1,2-Dichloroethane-d4		*108 %*	*75-125*		"	"	"	"	
Surrogate: Toluene-d8		*102 %*	*75-125*		"	"	"	"	

H&P Mobile Geochemistry Inc.

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SCS Engineers - Long Beach	Project: SCS022411-SB1	
3900 Kilroy Airport Way, Suite 100	Project Number: 01211039.01	Reported:
Long Beach, CA 90806-6816	Project Manager: Mr. Kevin Green	24-Feb-11 17:05

DRAFT: Volatile Organic Compounds by EPA Method 8260B Modified

H&P Mobile Geochemistry, Inc.

Analyte	Result	Reporting Limit	Units	Dilution Factor	Batch	Prepared	Analyzed	Method	Notes
DRAFT: SV7-5', P333cc (E102085-12) Vapor Sampled: 24-Feb-11 Received: 24-Feb-11									
1,1-Difluoroethane (LCC)	ND	10	ug/l	0.04	EB12406	24-Feb-11	24-Feb-11	EPA 8260B	
Dichlorodifluoromethane (F12)	ND	0.50	"	"	"	"	"	"	
Vinyl chloride	ND	0.04	"	"	"	"	"	"	
Chloroethane	ND	0.50	"	"	"	"	"	"	
Trichlorofluoromethane (F11)	ND	0.50	"	"	"	"	"	"	
1,1-Dichloroethene	ND	0.50	"	"	"	"	"	"	
Methylene chloride (Dichloromethane)	ND	0.50	"	"	"	"	"	"	
1,1,2 Trichlorotrifluoroethane (F113)	ND	0.50	"	"	"	"	"	"	
trans-1,2-Dichloroethene	ND	0.50	"	"	"	"	"	"	
1,1-Dichloroethane	ND	0.50	"	"	"	"	"	"	
cis-1,2-Dichloroethene	ND	0.50	"	"	"	"	"	"	
Chloroform	ND	0.10	"	"	"	"	"	"	
1,1,1-Trichloroethane	ND	0.50	"	"	"	"	"	"	
Carbon tetrachloride	ND	0.08	"	"	"	"	"	"	
1,2-Dichloroethane (EDC)	ND	0.10	"	"	"	"	"	"	
Benzene	ND	0.10	"	"	"	"	"	"	
Trichloroethene	ND	0.10	"	"	"	"	"	"	
Toluene	ND	1.0	"	"	"	"	"	"	
1,1,2-Trichloroethane	ND	0.50	"	"	"	"	"	"	
Tetrachloroethene	ND	0.10	"	"	"	"	"	"	
Ethylbenzene	ND	0.50	"	"	"	"	"	"	
1,1,1,2-Tetrachloroethane	ND	0.50	"	"	"	"	"	"	
m,p-Xylene	ND	0.50	"	"	"	"	"	"	
o-Xylene	ND	0.50	"	"	"	"	"	"	
1,1,2,2-Tetrachloroethane	ND	0.50	"	"	"	"	"	"	
Surrogate: Dibromofluoromethane		*113 %*		*75-125*	"	"	"	"	
Surrogate: 1,2-Dichloroethane-d4		*111 %*		*75-125*	"	"	"	"	
Surrogate: Toluene-d8		*107 %*		*75-125*	"	"	"	"	

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SCS Engineers - Long Beach	Project: SCS022411-SB1	
3900 Kilroy Airport Way, Suite 100	Project Number: 01211039.01	Reported:
Long Beach, CA 90806-6816	Project Manager: Mr. Kevin Green	24-Feb-11 17:05

DRAFT: Volatile Organic Compounds by EPA Method 8260B Modified

H&P Mobile Geochemistry, Inc.

Analyte	Result	Reporting Limit	Units	Dilution Factor	Batch	Prepared	Analyzed	Method	Notes
DRAFT: SV8-5', P333cc (E102085-13) Vapor Sampled: 24-Feb-11 Received: 24-Feb-11									
1,1-Difluoroethane (LCC)	ND	10	ug/l	0.04	EB12406	24-Feb-11	24-Feb-11	EPA 8260B	
Dichlorodifluoromethane (F12)	ND	0.50	"	"	"	"	"	"	
Vinyl chloride	ND	0.04	"	"	"	"	"	"	
Chloroethane	ND	0.50	"	"	"	"	"	"	
Trichlorofluoromethane (F11)	ND	0.50	"	"	"	"	"	"	
1,1-Dichloroethene	ND	0.50	"	"	"	"	"	"	
Methylene chloride (Dichloromethane)	ND	0.50	"	"	"	"	"	"	
1,1,2 Trichlorotrifluoroethane (F113)	ND	0.50	"	"	"	"	"	"	
trans-1,2-Dichloroethene	ND	0.50	"	"	"	"	"	"	
1,1-Dichloroethane	ND	0.50	"	"	"	"	"	"	
cis-1,2-Dichloroethene	ND	0.50	"	"	"	"	"	"	
Chloroform	ND	0.10	"	"	"	"	"	"	
1,1,1-Trichloroethane	ND	0.50	"	"	"	"	"	"	
Carbon tetrachloride	ND	0.08	"	"	"	"	"	"	
1,2-Dichloroethane (EDC)	ND	0.10	"	"	"	"	"	"	
Benzene	ND	0.10	"	"	"	"	"	"	
Trichloroethene	ND	0.10	"	"	"	"	"	"	
Toluene	ND	1.0	"	"	"	"	"	"	
1,1,2-Trichloroethane	ND	0.50	"	"	"	"	"	"	
Tetrachloroethene	ND	0.10	"	"	"	"	"	"	
Ethylbenzene	ND	0.50	"	"	"	"	"	"	
1,1,1,2-Tetrachloroethane	ND	0.50	"	"	"	"	"	"	
m,p-Xylene	ND	0.50	"	"	"	"	"	"	
o-Xylene	ND	0.50	"	"	"	"	"	"	
1,1,2,2-Tetrachloroethane	ND	0.50	"	"	"	"	"	"	
Surrogate: Dibromofluoromethane		*112 %*		*75-125*	"	"	"	"	
Surrogate: 1,2-Dichloroethane-d4		*111 %*		*75-125*	"	"	"	"	
Surrogate: Toluene-d8		*104 %*		*75-125*	"	"	"	"	

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SCS Engineers - Long Beach	Project: SCS022411-SB1	
3900 Kilroy Airport Way, Suite 100	Project Number: 01211039.01	Reported:
Long Beach, CA 90806-6816	Project Manager: Mr. Kevin Green	24-Feb-11 17:05

DRAFT: Volatile Organic Compounds by EPA Method 8260B Modified

H&P Mobile Geochemistry, Inc.

Analyte	Result	Reporting Limit	Units	Dilution Factor	Batch	Prepared	Analyzed	Method	Notes
DRAFT: SV10-5', P333cc (E102085-14) Vapor Sampled: 24-Feb-11 Received: 24-Feb-11									
1,1-Difluoroethane (LCC)	ND	10	ug/l	0.04	EB12406	24-Feb-11	24-Feb-11	EPA 8260B	
Dichlorodifluoromethane (F12)	ND	0.50	"	"	"	"	"	"	
Vinyl chloride	ND	0.04	"	"	"	"	"	"	
Chloroethane	ND	0.50	"	"	"	"	"	"	
Trichlorofluoromethane (F11)	**0.67**	0.50	"	"	"	"	"	"	
1,1-Dichloroethene	ND	0.50	"	"	"	"	"	"	
Methylene chloride (Dichloromethane)	ND	0.50	"	"	"	"	"	"	
1,1,2 Trichlorotrifluoroethane (F113)	ND	0.50	"	"	"	"	"	"	
trans-1,2-Dichloroethene	ND	0.50	"	"	"	"	"	"	
1,1-Dichloroethane	ND	0.50	"	"	"	"	"	"	
cis-1,2-Dichloroethene	ND	0.50	"	"	"	"	"	"	
Chloroform	ND	0.10	"	"	"	"	"	"	
1,1,1-Trichloroethane	ND	0.50	"	"	"	"	"	"	
Carbon tetrachloride	ND	0.08	"	"	"	"	"	"	
1,2-Dichloroethane (EDC)	ND	0.10	"	"	"	"	"	"	
Benzene	ND	0.10	"	"	"	"	"	"	
Trichloroethene	ND	0.10	"	"	"	"	"	"	
Toluene	ND	1.0	"	"	"	"	"	"	
1,1,2-Trichloroethane	ND	0.50	"	"	"	"	"	"	
Tetrachloroethene	**0.14**	0.10	"	"	"	"	"	"	
Ethylbenzene	ND	0.50	"	"	"	"	"	"	
1,1,1,2-Tetrachloroethane	ND	0.50	"	"	"	"	"	"	
m,p-Xylene	ND	0.50	"	"	"	"	"	"	
o-Xylene	ND	0.50	"	"	"	"	"	"	
1,1,2,2-Tetrachloroethane	ND	0.50	"	"	"	"	"	"	
Surrogate: Dibromofluoromethane		*113 %*		*75-125*	"	"	"	"	
Surrogate: 1,2-Dichloroethane-d4		*109 %*		*75-125*	"	"	"	"	
Surrogate: Toluene-d8		*104 %*		*75-125*	"	"	"	"	

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SCS Engineers - Long Beach	Project: SCS022411-SB1	
3900 Kilroy Airport Way, Suite 100	Project Number: 01211039.01	Reported:
Long Beach, CA 90806-6816	Project Manager: Mr. Kevin Green	24-Feb-11 17:05

DRAFT: Volatile Organic Compounds by EPA Method 8260B Modified

H&P Mobile Geochemistry, Inc.

Analyte	Result	Reporting Limit	Units	Dilution Factor	Batch	Prepared	Analyzed	Method	Notes
DRAFT: SV11-5', P333cc (E102085-15) Vapor Sampled: 24-Feb-11 Received: 24-Feb-11									
1,1-Difluoroethane (LCC)	ND	10	ug/l	0.04	EB12406	24-Feb-11	24-Feb-11	EPA 8260B	
Dichlorodifluoromethane (F12)	ND	0.50	"	"	"	"	"	"	
Vinyl chloride	ND	0.04	"	"	"	"	"	"	
Chloroethane	ND	0.50	"	"	"	"	"	"	
Trichlorofluoromethane (F11)	ND	0.50	"	"	"	"	"	"	
1,1-Dichloroethene	ND	0.50	"	"	"	"	"	"	
Methylene chloride (Dichloromethane)	ND	0.50	"	"	"	"	"	"	
1,1,2 Trichlorotrifluoroethane (F113)	ND	0.50	"	"	"	"	"	"	
trans-1,2-Dichloroethene	ND	0.50	"	"	"	"	"	"	
1,1-Dichloroethane	ND	0.50	"	"	"	"	"	"	
cis-1,2-Dichloroethene	ND	0.50	"	"	"	"	"	"	
Chloroform	ND	0.10	"	"	"	"	"	"	
1,1,1-Trichloroethane	ND	0.50	"	"	"	"	"	"	
Carbon tetrachloride	ND	0.08	"	"	"	"	"	"	
1,2-Dichloroethane (EDC)	ND	0.10	"	"	"	"	"	"	
Benzene	ND	0.10	"	"	"	"	"	"	
Trichloroethene	ND	0.10	"	"	"	"	"	"	
Toluene	ND	1.0	"	"	"	"	"	"	
1,1,2-Trichloroethane	ND	0.50	"	"	"	"	"	"	
Tetrachloroethene	ND	0.10	"	"	"	"	"	"	
Ethylbenzene	ND	0.50	"	"	"	"	"	"	
1,1,1,2-Tetrachloroethane	ND	0.50	"	"	"	"	"	"	
m,p-Xylene	ND	0.50	"	"	"	"	"	"	
o-Xylene	ND	0.50	"	"	"	"	"	"	
1,1,2,2-Tetrachloroethane	ND	0.50	"	"	"	"	"	"	
Surrogate: Dibromofluoromethane		*123 %*		*75-125*	"	"	"	"	
Surrogate: 1,2-Dichloroethane-d4		*119 %*		*75-125*	"	"	"	"	
Surrogate: Toluene-d8		*109 %*		*75-125*	"	"	"	"	

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SCS Engineers - Long Beach	Project: SCS022411-SB1	
3900 Kilroy Airport Way, Suite 100	Project Number: 01211039.01	Reported:
Long Beach, CA 90806-6816	Project Manager: Mr. Kevin Green	24-Feb-11 17:05

DRAFT: Volatile Organic Compounds by EPA Method 8260B Modified

H&P Mobile Geochemistry, Inc.

Analyte	Result	Reporting Limit	Units	Dilution Factor	Batch	Prepared	Analyzed	Method	Notes
DRAFT: SV13-5', P333cc (E102085-16) Vapor Sampled: 24-Feb-11 Received: 24-Feb-11									
1,1-Difluoroethane (LCC)	ND	10	ug/l	0.04	EB12406	24-Feb-11	24-Feb-11	EPA 8260B	
Dichlorodifluoromethane (F12)	ND	0.50	"	"	"	"	"	"	
Vinyl chloride	ND	0.04	"	"	"	"	"	"	
Chloroethane	ND	0.50	"	"	"	"	"	"	
Trichlorofluoromethane (F11)	ND	0.50	"	"	"	"	"	"	
1,1-Dichloroethene	ND	0.50	"	"	"	"	"	"	
Methylene chloride (Dichloromethane)	ND	0.50	"	"	"	"	"	"	
1,1,2 Trichlorotrifluoroethane (F113)	ND	0.50	"	"	"	"	"	"	
trans-1,2-Dichloroethene	ND	0.50	"	"	"	"	"	"	
1,1-Dichloroethane	ND	0.50	"	"	"	"	"	"	
cis-1,2-Dichloroethene	ND	0.50	"	"	"	"	"	"	
Chloroform	ND	0.10	"	"	"	"	"	"	
1,1,1-Trichloroethane	ND	0.50	"	"	"	"	"	"	
Carbon tetrachloride	ND	0.08	"	"	"	"	"	"	
1,2-Dichloroethane (EDC)	ND	0.10	"	"	"	"	"	"	
Benzene	ND	0.10	"	"	"	"	"	"	
Trichloroethene	ND	0.10	"	"	"	"	"	"	
Toluene	ND	1.0	"	"	"	"	"	"	
1,1,2-Trichloroethane	ND	0.50	"	"	"	"	"	"	
Tetrachloroethene	ND	0.10	"	"	"	"	"	"	
Ethylbenzene	ND	0.50	"	"	"	"	"	"	
1,1,1,2-Tetrachloroethane	ND	0.50	"	"	"	"	"	"	
m,p-Xylene	ND	0.50	"	"	"	"	"	"	
o-Xylene	ND	0.50	"	"	"	"	"	"	
1,1,2,2-Tetrachloroethane	ND	0.50	"	"	"	"	"	"	
Surrogate: Dibromofluoromethane		*122 %*		*75-125*	"	"	"	"	
Surrogate: 1,2-Dichloroethane-d4		*117 %*		*75-125*	"	"	"	"	
Surrogate: Toluene-d8		*105 %*		*75-125*	"	"	"	"	

H&P Mobile Geochemistry Inc.

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SCS Engineers - Long Beach	Project: SCS022411-SB1	
3900 Kilroy Airport Way, Suite 100	Project Number: 01211039.01	Reported:
Long Beach, CA 90806-6816	Project Manager: Mr. Kevin Green	24-Feb-11 17:05

DRAFT: Volatile Organic Compounds by EPA Method 8260B Modified

H&P Mobile Geochemistry, Inc.

Analyte	Result	Reporting Limit	Units	Dilution Factor	Batch	Prepared	Analyzed	Method	Notes
DRAFT: SV14-5', P333cc (E102085-17) Vapor Sampled: 24-Feb-11 Received: 24-Feb-11									
1,1-Difluoroethane (LCC)	ND	10	ug/l	0.04	EB12406	24-Feb-11	24-Feb-11	EPA 8260B	
Dichlorodifluoromethane (F12)	ND	0.50	"	"	"	"	"	"	
Vinyl chloride	ND	0.04	"	"	"	"	"	"	
Chloroethane	ND	0.50	"	"	"	"	"	"	
Trichlorofluoromethane (F11)	ND	0.50	"	"	"	"	"	"	
1,1-Dichloroethene	ND	0.50	"	"	"	"	"	"	
Methylene chloride (Dichloromethane)	ND	0.50	"	"	"	"	"	"	
1,1,2 Trichlorotrifluoroethane (F113)	ND	0.50	"	"	"	"	"	"	
trans-1,2-Dichloroethene	ND	0.50	"	"	"	"	"	"	
1,1-Dichloroethane	ND	0.50	"	"	"	"	"	"	
cis-1,2-Dichloroethene	ND	0.50	"	"	"	"	"	"	
Chloroform	ND	0.10	"	"	"	"	"	"	
1,1,1-Trichloroethane	ND	0.50	"	"	"	"	"	"	
Carbon tetrachloride	ND	0.08	"	"	"	"	"	"	
1,2-Dichloroethane (EDC)	ND	0.10	"	"	"	"	"	"	
Benzene	ND	0.10	"	"	"	"	"	"	
Trichloroethene	ND	0.10	"	"	"	"	"	"	
Toluene	ND	1.0	"	"	"	"	"	"	
1,1,2-Trichloroethane	ND	0.50	"	"	"	"	"	"	
Tetrachloroethene	ND	0.10	"	"	"	"	"	"	
Ethylbenzene	ND	0.50	"	"	"	"	"	"	
1,1,1,2-Tetrachloroethane	ND	0.50	"	"	"	"	"	"	
m,p-Xylene	ND	0.50	"	"	"	"	"	"	
o-Xylene	ND	0.50	"	"	"	"	"	"	
1,1,2,2-Tetrachloroethane	ND	0.50	"	"	"	"	"	"	
Surrogate: Dibromofluoromethane		*117 %*		*75-125*	"	"	"	"	
Surrogate: 1,2-Dichloroethane-d4		*108 %*		*75-125*	"	"	"	"	
Surrogate: Toluene-d8		*105 %*		*75-125*	"	"	"	"	

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SCS Engineers - Long Beach	Project: SCS022411-SB1	
3900 Kilroy Airport Way, Suite 100	Project Number: 01211039.01	Reported:
Long Beach, CA 90806-6816	Project Manager: Mr. Kevin Green	24-Feb-11 17:05

DRAFT: Volatile Organic Compounds by EPA Method 8260B Modified

H&P Mobile Geochemistry, Inc.

Analyte	Result	Reporting Limit	Units	Dilution Factor	Batch	Prepared	Analyzed	Method	Notes
DRAFT: SV12-5', P333cc (E102085-18) Vapor Sampled: 24-Feb-11 Received: 24-Feb-11									
1,1-Difluoroethane (LCC)	ND	10	ug/l	0.04	EB12406	24-Feb-11	24-Feb-11	EPA 8260B	
Dichlorodifluoromethane (F12)	ND	0.50	"	"	"	"	"	"	
Vinyl chloride	ND	0.04	"	"	"	"	"	"	
Chloroethane	ND	0.50	"	"	"	"	"	"	
Trichlorofluoromethane (F11)	ND	0.50	"	"	"	"	"	"	
1,1-Dichloroethene	ND	0.50	"	"	"	"	"	"	
Methylene chloride (Dichloromethane)	ND	0.50	"	"	"	"	"	"	
1,1,2 Trichlorotrifluoroethane (F113)	ND	0.50	"	"	"	"	"	"	
trans-1,2-Dichloroethene	ND	0.50	"	"	"	"	"	"	
1,1-Dichloroethane	ND	0.50	"	"	"	"	"	"	
cis-1,2-Dichloroethene	ND	0.50	"	"	"	"	"	"	
Chloroform	ND	0.10	"	"	"	"	"	"	
1,1,1-Trichloroethane	ND	0.50	"	"	"	"	"	"	
Carbon tetrachloride	ND	0.08	"	"	"	"	"	"	
1,2-Dichloroethane (EDC)	ND	0.10	"	"	"	"	"	"	
Benzene	ND	0.10	"	"	"	"	"	"	
Trichloroethene	ND	0.10	"	"	"	"	"	"	
Toluene	ND	1.0	"	"	"	"	"	"	
1,1,2-Trichloroethane	ND	0.50	"	"	"	"	"	"	
Tetrachloroethene	**0.20**	0.10	"	"	"	"	"	"	
Ethylbenzene	ND	0.50	"	"	"	"	"	"	
1,1,1,2-Tetrachloroethane	ND	0.50	"	"	"	"	"	"	
m,p-Xylene	ND	0.50	"	"	"	"	"	"	
o-Xylene	ND	0.50	"	"	"	"	"	"	
1,1,2,2-Tetrachloroethane	ND	0.50	"	"	"	"	"	"	
Surrogate: Dibromofluoromethane		*119 %*		*75-125*	"	"	"	"	
Surrogate: 1,2-Dichloroethane-d4		*114 %*		*75-125*	"	"	"	"	
Surrogate: Toluene-d8		*106 %*		*75-125*	"	"	"	"	

Mobile Geochemistry Inc.

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Carlsbad, CA 92010
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SCS Engineers - Long Beach	Project: SCS022411-SB1	
3900 Kilroy Airport Way, Suite 100	Project Number: 01211039.01	Reported:
Long Beach, CA 90806-6816	Project Manager: Mr. Kevin Green	24-Feb-11 17:05

DRAFT: Volatile Organic Compounds by EPA Method 8260B Modified

H&P Mobile Geochemistry, Inc.

Analyte	Result	Reporting Limit	Units	Dilution Factor	Batch	Prepared	Analyzed	Method	Notes
DRAFT: SV2-15', P363cc (E102085-19) Vapor Sampled: 24-Feb-11 Received: 24-Feb-11									
1,1-Difluoroethane (LCC)	ND	10	ug/l	0.04	EB12406	24-Feb-11	24-Feb-11	EPA 8260B	
Dichlorodifluoromethane (F12)	ND	0.50	"	"	"	"	"	"	
Vinyl chloride	ND	0.04	"	"	"	"	"	"	
Chloroethane	ND	0.50	"	"	"	"	"	"	
Trichlorofluoromethane (F11)	**0.66**	0.50	"	"	"	"	"	"	
1,1-Dichloroethene	ND	0.50	"	"	"	"	"	"	
Methylene chloride (Dichloromethane)	ND	0.50	"	"	"	"	"	"	
1,1,2 Trichlorotrifluoroethane (F113)	ND	0.50	"	"	"	"	"	"	
trans-1,2-Dichloroethene	ND	0.50	"	"	"	"	"	"	
1,1-Dichloroethane	ND	0.50	"	"	"	"	"	"	
cis-1,2-Dichloroethene	ND	0.50	"	"	"	"	"	"	
Chloroform	ND	0.10	"	"	"	"	"	"	
1,1,1-Trichloroethane	ND	0.50	"	"	"	"	"	"	
Carbon tetrachloride	ND	0.08	"	"	"	"	"	"	
1,2-Dichloroethane (EDC)	ND	0.10	"	"	"	"	"	"	
Benzene	ND	0.10	"	"	"	"	"	"	
Trichloroethene	ND	0.10	"	"	"	"	"	"	
Toluene	ND	1.0	"	"	"	"	"	"	
1,1,2-Trichloroethane	ND	0.50	"	"	"	"	"	"	
Tetrachloroethene	**2.4**	0.10	"	"	"	"	"	"	
Ethylbenzene	ND	0.50	"	"	"	"	"	"	
1,1,1,2-Tetrachloroethane	ND	0.50	"	"	"	"	"	"	
m,p-Xylene	ND	0.50	"	"	"	"	"	"	
o-Xylene	ND	0.50	"	"	"	"	"	"	
1,1,2,2-Tetrachloroethane	ND	0.50	"	"	"	"	"	"	
Surrogate: Dibromofluoromethane		*120 %*		*75-125*	"	"	"	"	
Surrogate: 1,2-Dichloroethane-d4		*116 %*		*75-125*	"	"	"	"	
Surrogate: Toluene-d8		*104 %*		*75-125*	"	"	"	"	

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SCS Engineers - Long Beach	Project: SCS022411-SB1	
3900 Kilroy Airport Way, Suite 100	Project Number: 01211039.01	Reported:
Long Beach, CA 90806-6816	Project Manager: Mr. Kevin Green	24-Feb-11 17:05

DRAFT: Volatile Organic Compounds by EPA Method 8260B Modified - Quality Control

H&P Mobile Geochemistry, Inc.

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Batch EB12406 - EPA 5030										
Blank (EB12406-BLK1)				Prepared & Analyzed: 24-Feb-11						
1,1-Difluoroethane (LCC)	ND	10	ug/l							
Dichlorodifluoromethane (F12)	ND	0.50	"							
Vinyl chloride	ND	0.05	"							
Chloroethane	ND	0.50	"							
Trichlorofluoromethane (F11)	ND	0.50	"							
1,1-Dichloroethene	ND	0.50	"							
Methylene chloride (Dichloromethane)	ND	0.50	"							
1,1,2 Trichlorotrifluoroethane (F113)	ND	0.50	"							
trans-1,2-Dichloroethene	ND	0.50	"							
1,1-Dichloroethane	ND	0.50	"							
cis-1,2-Dichloroethene	ND	0.50	"							
Chloroform	ND	0.10	"							
1,1,1-Trichloroethane	ND	0.50	"							
Carbon tetrachloride	ND	0.10	"							
1,2-Dichloroethane (EDC)	ND	0.10	"							
Benzene	ND	0.10	"							
Trichloroethene	ND	0.10	"							
Toluene	ND	1.0	"							
1,1,2-Trichloroethane	ND	0.50	"							
Tetrachloroethene	ND	0.10	"							
Ethylbenzene	ND	0.50	"							
1,1,1,2-Tetrachloroethane	ND	0.50	"							
m,p-Xylene	ND	0.50	"							
o-Xylene	ND	0.50	"							
1,1,2,2-Tetrachloroethane	ND	0.50	"							
Surrogate: Dibromofluoromethane	*2.81*		"	*2.50*		*112*	*75-125*			
Surrogate: 1,2-Dichloroethane-d4	*2.72*		"	*2.50*		*109*	*75-125*			
Surrogate: Toluene-d8	*2.59*		"	*2.50*		*104*	*75-125*			

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Long Beach, CA 90806-6816	Project Manager: Mr. Kevin Green	24-Feb-11 17:05

Notes and Definitions

DET	Analyte DETECTED
ND	Analyte NOT DETECTED at or above the reporting limit
NR	Not Reported
dry	Sample results reported on a dry weight basis
RPD	Relative Percent Difference

Appendix

H&P Mobile Geochemistry, Inc. is approved as an Environmental Laboratory in conformance with the Environmental Laboratory Accreditation Program (CA) for the category of Volatile and Semi-Volatile Organic Chemistry of Hazardous Waste for the following methods:

Certificate# 2741, 2743, 2579, 2754 & 2740 approved for EPA 8260 and LUFT GC/MS
Certificate# 2742, 2745, & 2741 approved for LUFT
Certificate# 2745 & 2742 approved for EPA 418.1

H&P Mobile Geochemistry, Inc. is approved as an Environmental Laboratory in conformance with the National Environmental Accreditation Conference Standards for the category Environmental Analysis Air and Emissions for the following analytes and methods:

1,2,4-Trichlorobenzene by EPA TO-15 & TO-14A
Hexachlorobutadiene by EPA TO-15 & TO-14A
1,2,4-Trimethylbenzene by EPA TO -14A
1,2-Dichlorobenzene by EPA TO-15 & TO-14A
1,3,5-Trimethylbenzene by EPA TO -14A
1,4-Dichlorobenzene by EPA TO-15 & TO-14A
Benzene by EPA TO-15 & TO-14A
Chlorobenzene by EPA TO-15 & TO-14A
Ethyl benzene by EPA TO-15 & TO-14A
Styrene by EPA TO-15 & TO-14A
Toluene by EPA TO-15 & TO-14A
Total Xylenes by EPA TO-15 & TO-14A
1,1,1-Trichloroethane by EPA TO-15 & TO-14A
1,1,2,2-Tetrachloroethane by EPA TO-15 & TO-14A
1,1,2-Trichloroethane by EPA TO-15 & TO-14A
1,1-Dichloroethane by EPA TO-15 & TO-14A
1,1-Dichloroethene by EPA TO-15 & TO-14A
1,2-Dichloroethane by EPA TO-15 & TO-14A
1,2-Dichloropropane by EPA TO-15 & TO-14A
Bromoform by EPA TO-15
Bromomethane by EPA TO-15 & TO-14A
Carbon tetrachloride by EPA TO-15 & TO-14A
Chloroethane by EPA TO-15
Chloroform by EPA TO-15 & TO-14A
Chloromethane by EPA TO-15 & TO-14A
cis-1,2-Dichloroethene by EPA TO-15
cis-1,2-Dichloropropene by EPA TO-15 & TO-14A
Methylene chloride by EPA TO -15 & TO-14A
Tetrachloroethane by EPA TO-15 & TO-14A
trans-1,2-Dichloroethene by EPA TO-15
trans-1,2-Dichloropropene by EPA TO-15 & TO-14A
Trichloroethene by EPA TO-15 & TO-14A
Vinyl chloride by EPA TO -15 & TO-14A
2-Butanone by EPA TO-15
4-Methyl-2-Pentanone by EPA TO-15
Hexane by EPA TO-15
Methyl tert-butyl ether by EPA TO-15
Vinyl acetate by EPA TO-15

This certification applies to samples analyzed in summa canisters.

APPENDIX L

DTSC ARSENIC STRATEGIES

Department of Toxic Substances Control

Maureen F. Gorsen, Director
8800 Cal Center Drive
Sacramento, California 95826-3200

Linda S. Adams
Secretary for
Environmental Protection

Arnold Schwarzenegger
Governor

Arsenic Strategies

Determination of Arsenic Remediation
Development of Arsenic Cleanup Goals

January 16, 2009

The Department of Toxic Substances Control (DTSC) oversees the environmental assessments of hazardous waste sites and proposed and existing schools. During the Preliminary Environmental Assessment (PEA) or Remedial Investigation (RI) for sites, arsenic may be identified as a chemical of concern based on comparisons to naturally occurring background concentrations. Once arsenic has been identified as a chemical of concern, a standard approach is needed to determine if remedial action is warranted and, if so, how to develop appropriate cleanup goals. The following is the suggested approach from the DTSC Human and Ecological Risk Division (HERD) for arsenic remediation on sites.

Determination of Necessity for Remedial Action

Once arsenic concentrations have been identified to be above background levels, additional characterization may be required to determine the lateral and vertical extent of contamination. This information should be used in the decision making process for the necessity of a removal action. For the areas with elevated arsenic concentrations, if the data from the step out samples indicate that they are isolated areas (i.e., no real extent of contamination), no remedial action may be an option. For areas with high levels of arsenic concentrations, this approach may not be applicable. The complete data set for arsenic should be considered in the determination, including background, onsite ambient levels, and potential contamination.

Development of Cleanup Goals

The following are two options for developing a cleanup goal for arsenic.

Option 1

The upper limit of the background data set can be selected as the cleanup goal.

Option 2

Cleanup goals may be developed using the site specific data set for the project. This data set may include both the data from the site as well as background values from the immediate area. The approach uses both visual evaluation of the data plots (graphical evaluation) and statistical calculations (statistical evaluation).

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Graphical Evaluation

Step 1: Create normality plots. The plot should be completed using both log transformed and non-transformed data.

Step 2: For limited data sets, visually determine the inflection point in the distribution. This inflection point can in some cases be used as the approximation for a cleanup goal.

Statistical Evaluation

Step 1: After entering the data into an Excel spreadsheet, calculate summary statistics for the data set (e.g., mean, standard deviation, first quartile and third quartile). If the data set is sufficiently large, evaluate outliers in the data set. Suggested techniques include the ***fourth spread***, or other comparable techniques. Remove outliers from data set and estimate the Upper 95% Limit for the 0.99 Quartile $UL_{0.95}(X_{0.99})$ as described by Gilbert (1987).

Step 2: Recalculate summary statistics, including 95% Upper Confidence Limit (UCL) using modified data set.

Step 3 (optional): Comparisons of arsenic concentrations corresponding to the approximated inflection point with the summary statistics from data set excluding outliers.

Discussion of Uncertainties

- The incremental cancer risk difference between background levels and proposed cleanup goals will be very small or insignificant in most cases.

- Soil cleanup goals do not take into consideration potentially limited bioavailability of arsenic in soil. Most toxicology studies were based on arsenic in water, which is considerably more bioavailable.

Examples of Derivation of Arsenic Cleanup Goals

Example 1: Simple, Graphical Determination of the Arsenic Clean-up Goal

The following example utilizes an actual data set from a school site in southern California. This example represents a rather large data set with 651 sample values. Table 1 summarizes the data set statistics.

Table 1
Arsenic Data Set Summary Statistics

DESCRIPTIVE STATISTIC	VALUE
Number of Samples	651
Minimum Concentration	0.27
Maximum Concentration	33
Mean Concentration	6.9
Median Concentration	6.7
Standard Deviation	4.02

Figure 1 presents the normality plot of the raw arsenic data. As can be seen from the plot, the data appears to be normally distributed and linear in the range from 1.0 up to about 12 mg/kg, where a distinct change in slope can be seen. This linear portion of the curve would be representative of ambient arsenic in this typical, urban environment. The inflection point where the slope changes is indicative of a population different from ambient arsenic, i.e., site contamination. For this example, 12 mg/kg would represent the upper-bound of ambient arsenic in soil at this site and would serve as the clean-up goal for arsenic.

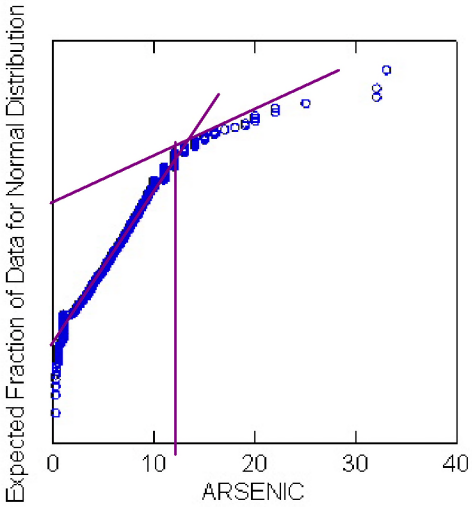


Figure 1
Normality Plot of the Arsenic Data Set

Example 2: Statistical Determination of the Arsenic Clean-up Goal

The following example utilizes a combined data set made up of 19 sites in southern California in order to exemplify the statistical determination of an arsenic clean-up goal. Figure 2 presents a plot of the frequency verses arsenic concentration, also known as a histogram. The shape of the histogram clearly demonstrates a classical, lognormal distribution. The descriptive statistics for the "Log-Transformed" combined arsenic data set of 1097 samples are summarized in Table 2.

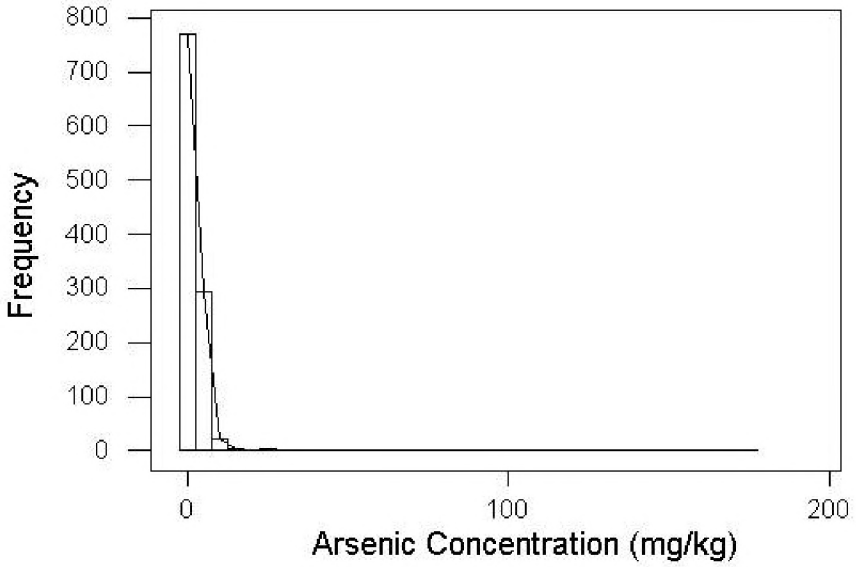


Figure 2
Histogram of the Arsenic Data

Table 2
Descriptive Statistics of the Combined Arsenic Data Set

DESCRIPTIVE STATISTIC	VALUE
Sample Size (n)	1097
Mean (μ)	0.1873 (1.54 mg/kg)
Median	0.1761 (1.50 mg/kg)
Standard Deviation	0.3916
Standard Error of the Mean[1]	0.0118
Minimum Concentration	-1.7620 (0.02 mg/kg)
Maximum Concentration	2.2480 (177 mg/kg)
Lower Quartile (Q_1)	-0.1249
Upper Quartile (Q_3)	0.4502

[1] The *Standard Error of the Mean* = $\frac{Std.Dev.}{\sqrt{n}}$

Because of the large sample size, wide range of arsenic concentrations and obvious extremes of the distribution, the data were analyzed for values that do not conform to

the pattern established by the majority of values in the data set, e.g., ***outliers***. To determine the outliers in the arsenic data set, a pictorial summary called the box plot was utilized. A box plot describes the most prominent features of a data set, including 1) center, 2) spread, 3) extent and nature of any departure from symmetry and 4) identification of any outliers or observations that lie unusually far from the main body of data. A box plot is based on measures that are unaffected by the presence of a few outliers, also known as the ***fourth spread***, f_s. The fourth spread, f_s, is defined as the measure of spread in a data set that is resistant to outliers and is calculated according to the following equation.

$$f_s = Q_3 - Q_1 \qquad \textbf{(Equation 1)}$$

$$= (0.4502 - (-0.1249))$$

$$= 0.5751$$

By definition, any observation farther than $1.5f_s$ from the closest fourth is considered an outlier. For the combined arsenic data set, $1.5f_s$ is equal to 0.8627 and any observation below $Q_1 - 1.5f_s$ or above $Q_3 + 1.5f_s$ would be considered an outlier. For the combined arsenic data set, outliers were defined as all observations:

$< Q1 - 1.5f_s$	and	$> Q3 + 1.5f_s$
$< (-0.1249 - 0.8627)$	and	$> (0.4502 + 0.8627)$
< -0.9876 (0.103 mg/kg)	and	> 1.3129 (20.55 mg/kg)

Therefore, the following arsenic concentrations were determined to be outliers: 177, 61.4, 49.2, 31.0, 27.6, 26.5, 24.0, 23.3, 22.7, 0.067 and 0.0173 mg/kg. These results are consistent with the box plot of the combined arsenic data set (Figure 3), which indicates that the nine largest and two lowest values are outliers.

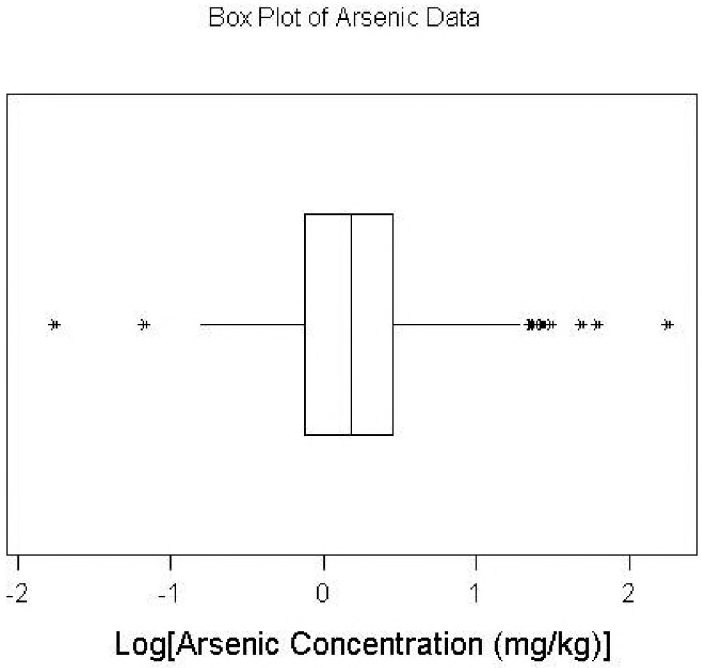


Figure 3

The large number of data points well characterizes the extremes of the distribution, thereby making it possible to use an estimate of an upper percentile of background concentrations as the value to be compared with the onsite C_{max}.

For this analysis, the 95% Upper Confidence Limit on the 99th-Percentile was chosen as the upper limit concentration. An upper 100(1 - α)% confidence limit for the true pth quantile, x_p, can be calculated if the underlying distribution is normal. As shown in Figure 4, the normal probability plot of arsenic data, excluding the outliers, clearly shows that the arsenic data is not normally distributed. However, as shown in Figure 5, the log-transformed arsenic data is normally distributed (i.e., the arsenic data fits a lognormal distribution). The descriptive statistics for the log-transformed arsenic data set, excluding the outliers previously established, are summarized in Table 3.

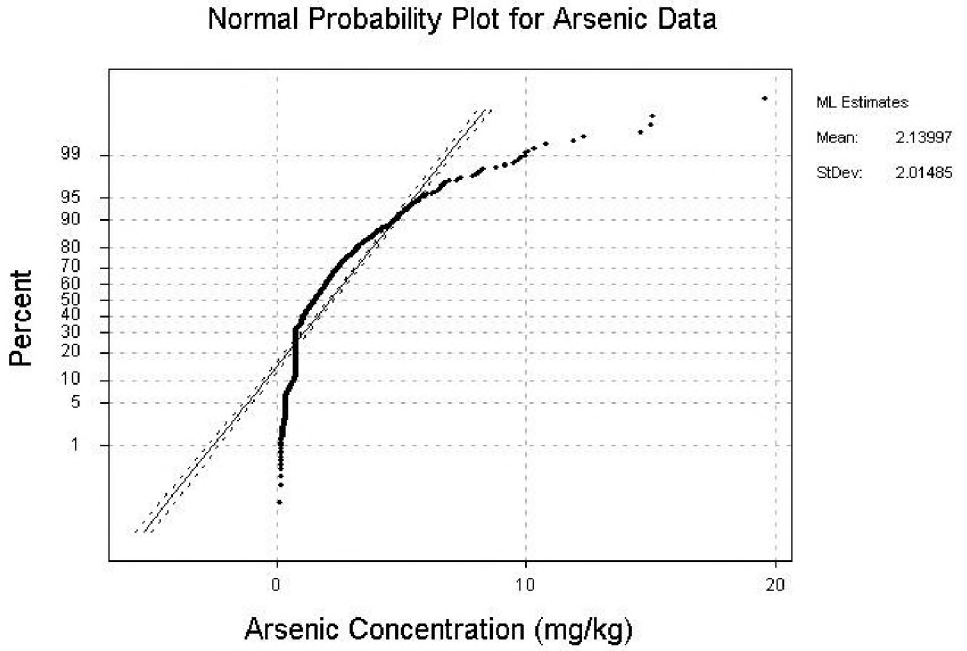


Figure 4

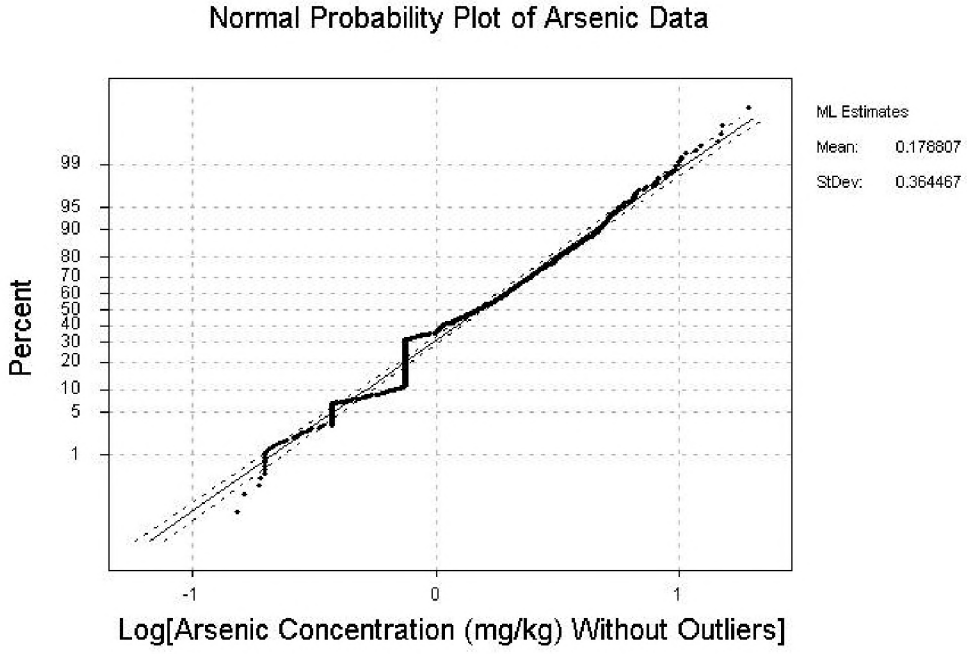


Figure 5

Table 3

Descriptive Statistics of the Combined Arsenic Data Set Without Outliers

DESCRIPTIVE STATISTIC	VALUE
Sample Size (n)	1086
Mean (μ)	0.1788 (1.51 mg/kg)
Median	0.1761 (1.50 mg/kg)
Standard Deviation	0.3646
Standard Error of the Mean[1]	0.0111
Minimum Concentration	-0.8125 (0.15 mg/kg)
Maximum Concentration	1.2930 (19.63 mg/kg)
Lower Quartile (Q_1)	-0.1249
Upper Quartile (Q_3)	0.4472

[1] The *Standard Error of the Mean* = $\frac{Std.Dev.}{\sqrt{n}}$

The upper limit of the data set can be estimated according to the following equation:

$$UL_{1-\alpha}\left(x_p\right) = \bar{x} + sK_{1-\alpha,p} \qquad \textbf{(Equation 2)}$$

Where,

$UL_{1-\alpha}\left(x_p\right) = The\ Upper\ Limit\ of\ the\ data\ set$

$\bar{x} = Mean\ \ of\ the\ data\ set$

$s = Std.\ Dev.\ of\ the\ mean$

$K_{1-\alpha,p} = Statistical\ tolerance\ \ factor\ \ for\ estimating\ an\ Upper\ 100(1-\alpha)$
$Confidence\ Limit\ on\ the\ \ pth\ Quantile$

For calculating the 95% confidence limit of the 99th quantile of the arsenic data set, excluding outliers, $\boldsymbol{K_{0.95,\ 0.99}}$ **= 2.40** (from Table A3, Gilbert 1987). Using the mean and standard deviation of the arsenic data set (Table 2), the $\boldsymbol{UL_{0.95}(X_{0.99})}$ can be calculated as follows:

$$UL_{0.95}(X_{0.99}) = 0.1788 + (2.40)(0.3646)$$
$$= 1.054$$

Since the arsenic data is log-transformed, the Upper Limit Concentration is the antilogarithm of this value.

$$UL_{0.95}(X_{0.99}) = 10^{1.054}$$

= 11.32 mg/kg

A distribution-free, non-parametric analysis was also conducted to estimate the theoretical ***$UL_{0.95}(X_{0.99})$*** as described by Gilbert (1987). This method, also known as the distribution-free technique, is used when the underlying distribution is either unknown or non-normal. This method was employed using the following equation:

$$The\ Rank\ of\ the\ UL_{0.95}(X_{0.99}) = p(n+1) + Z_{1-\alpha}[np(1-p)]^{1/2}$$ **(Equation 3)**

Where,

$$p = 99th Quantile = 0.99$$
$$Z_{1-\alpha} = Z\ Value\ for\ the\ 95\%\ Confidence\ Interval$$
$$= Z_{0.95}$$
$$= 1.645$$
$$n = Number\ of\ samples, excluding\ outliers$$
$$= 1086$$

For the arsenic data set, the Rank of the Upper 95% Limit for the 0.99 Quantile (***Rank of $UL_{0.95}(X_{0.99})$***) can be calculated as follows:

$$Rank\ of\ UL_{0.95}(X_{0.99}) = 0.99(1087) + 1.645[1086(0.99)(0.01)]^{1/2}$$
$$= 1081.524$$

Then, the ***$UL_{0.95}(X_{0.99})$*** would be the arsenic concentration that is 52.4% of the way between the 1081st and the 1082nd largest values. Since the 1081st value is 11.9 mg/kg and the 1082nd value is 12.3 mg/kg, the ***$UL_{0.95}(X_{0.99})$*** would be approximately **12 mg/kg**.

Example 3: Determination of the Arsenic Clean-up Goal

Examples 1 and 2 represent very large, ideal arsenic data sets used to demonstrate the graphical and statistical approaches to setting clean-up goals. The following example utilizes a much smaller and typical arsenic data set from a site in Southern California and demonstrates several methods for determination of arsenic cleanup goals.

Method 1. Graphical Evaluation

Step 1. Graphical representations of arsenic data set.

Create Normality plots using both raw and log transformed data as shown in Figures 6 and 7. The arsenic concentration can be plotted as a function of the expected value for a normal distribution or alternatively, the data set can be plotted from least value to highest value as the cumulative percent of samples. Either graphical treatment results in a curve representing the distribution of the data set.

Step 2. Visual inspection of the curves

Visual inspection of the curve may yield a determination of an inflection point which represents a break between the ambient level of arsenic for the site and the portion of the curve that represents a separate, higher population which may be a consequence of a release to the environment. For the example shown below it can be determined that an inflection point in the distribution of samples occurs at an approximate arsenic concentration of 10 mg/kg (Figure 6) or at the Log_{10}[arsenic concentration] value of 1 which corresponds to 10 mg/kg (Figure 7).

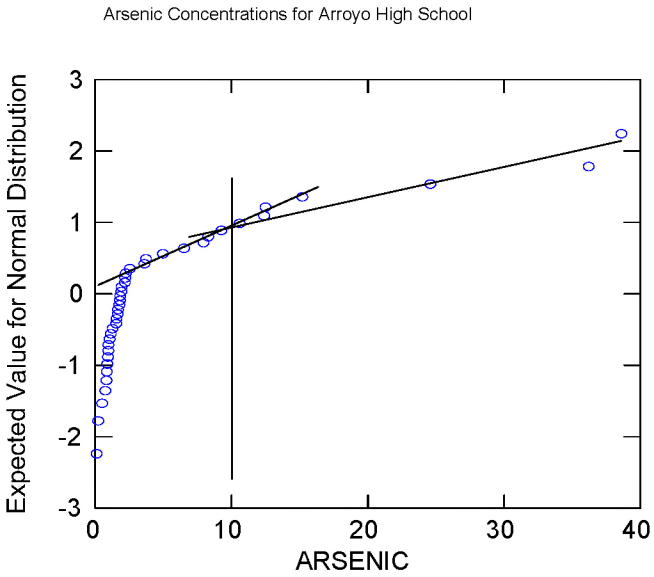


Figure 6
Distribution of arsenic concentrations in mg/kg

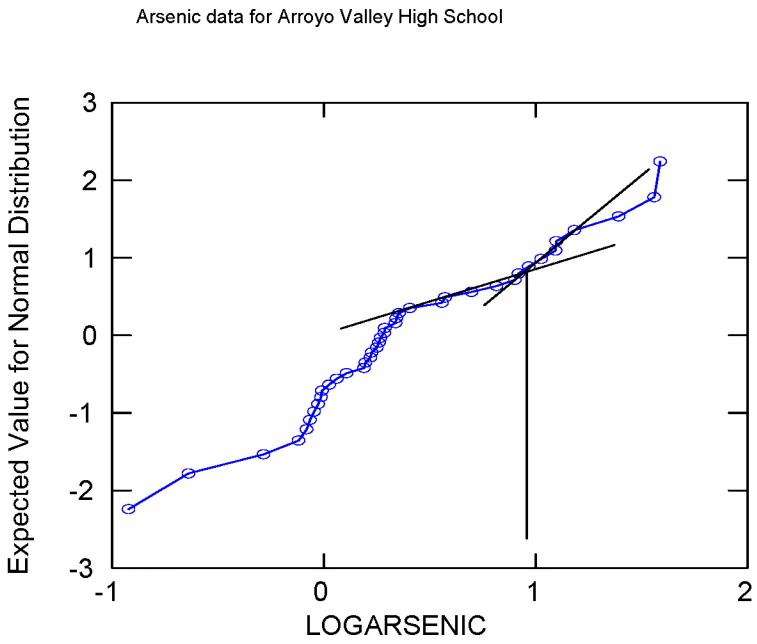


Figure 7
Distribution of arsenic in a log transformed representation

Method 2. Statistical Evaluation: Quartile Analysis ("Fourth Spread")

A statistical approach may be used that identifies upper-bound outliers which can then be removed from the data set to generate a new data set for which an upper confidence limit (UCL) can be defined and utilized as the cleanup goal.

Step 1. Derivation of Descriptive Statistics:

Descriptive statistics as shown in Table 4 were calculated for this site based on the site-specific arsenic data set. These statistics included: number of samples, minimum and maximum site concentration, mean, standard deviation, sample distribution, median and quartiles, 95th and 98th percentile and 95% UCL.

Table 4
Descriptive Statistics

DESCRIPTIVE STATISTIC	VALUE
Number of samples	40
Minimum detected value	0.12
Maximum detected value	38.6
Mean	5.75
First quartile (Q1)	0.98
Median	1.85
Third quartile (Q3)	4.98
95^{th} percentile	25.18
98^{th} percentile	36.73
95%UCL of mean	8.61
Standard deviation	8.93

Values listed in mg/kg

Step 2. Determine upper-bound outliers:

The quartile analysis to determine upper-bound outliers in the data set may be conducted as in the following example: The median and first and third quartiles from the data set shown in Table 4 were determined and a fourth spread (*Fs*) was generated.

First quartile (Q1) = 0.98
Median (second quartile, Q2) = 1.89
Third quartile (Q3) = 4.98

Fs = (Q3 –Q1) = 4.0

Outliers for the upper bound of the site-specific arsenic concentrations are defined as:

All data points greater than Q3 + [1.5 x *Fs*]: 4.98 + 6.0 = 10.98.

Therefore, any value higher than 10.98 mg/kg is considered an outlier (contaminated soil sample) and is eliminated from the data set because it is higher than the ambient level.

Step 3. Statistical re-evaluation of the data set.

The site-specific data set is then re-evaluated with outliers removed to create the adjusted site ambient data set. The statistical evaluation of the adjusted ambient data set yields the following values:

Table 5
Arsenic data set statistics with upper-bound outliers removed

Number of samples	35
Minimum detected value	0.12
Maximum detected value	10.6
Mean	3.74
Std deviation	6.49
98th percentile	9.72

Values listed in mg/kg

An appropriate cleanup goal for this site is the 98th percentile of the adjusted arsenic data set, which is approximately 10 mg/kg. Note that the 98th-percentile was used as an upper-bound for this data set due to the smaller number of samples (N = 40).

APPENDIX M

DTSC HUMAN HEALTH RISK ASSESSMENT (HHRA) NOTE

CALIFORNIA DEPARTMENT OF TOXIC SUBTANCES CONTROL (DTSC)
OFFICE OF HUMAN AND ECOLOGICAL RISK (HERO)

HUMAN HEALTH RISK ASSESSMENT (HHRA) NOTE

HERO HHRA NOTE NUMBER: 3

ISSUE DATE: July 14, 2014

ISSUE: DTSC recommended methodology for use of U.S. EPA Regional Screening Levels (RSLs) in the Human Health Risk Assessment process at hazardous waste sites and permitted facilities.

SUMMARY

In 2008, the U.S. EPA released Regional Screening Levels (RSLs) to replace the Preliminary Remediation Goals (PRGs) formerly available from several U.S. EPA Regional Headquarters. HERO reviewed the differences in methodology and RSL concentrations to develop a methodology to incorporate the RSLs into HERO human health risk assessment consultation and review., In addition to incorporation of more recent toxicity values than those used in the U.S. EPA Region 9 PRGs, several differences in methodology result in a subset of RSLs substantially higher (less protective) than PRGs.

HERO's review to date has been conducted in two phases: Phase I (soil and tapwater RSLs) and Phase II (air RSLs). Initial versions of HHRA Note 3 addressed a Phase I review only. A Phase II review was incorporated into the May 21, 2013 iteration of HHRA Note 3.

HERO's Phase I review addresses the soil and tapwater RSLs only. This revision of HHRA Note 3 incorporates HERO recommendations based on review of the May 2013 RSL tables. For the majority of the approximately 750 listed chemicals, HERO recommends the values listed in the U.S. EPA RSL table. However some values listed in the U.S. EPA RSL table differ significantly (greater than four-fold) from values calculated using CalEPA toxicity criteria and risk assessment procedures. In an effort to provide risk assessment RSL recommendations, HERO has prepared reference Table 1 for compounds with soil and tapwater RSLs for which 1) the 2004 PRG should be used; 2) the 2004 'Cal-modified' PRG should be used; or 3) the DTSC-modified screening levels derived using the RSL on-line screening calculator should be used. In addition, specific recommendations and discussion are provided for several contaminants. Alternatively, in consultation with HERO, the U.S. EPA on-line screening calculator can be used to calculate site-specific values using the more protective of CalEPA and U.S. EPA toxicity values and applying assumptions consistent with HERO recommendations (e.g. route-to-route extrapolation between

the oral and inhalation exposure pathways where no toxicity value is available for the inhalation route of exposure but an oral toxicity value is available).

HERO's Phase II review addresses the residential and industrial air RSLs for a subset of volatile organic compounds (VOCs) frequently found at California hazardous waste sites and permitted facilities. A complete listing of the VOCs reviewed by HERO is presented in reference Table 2. As shown in Table 2, HERO concurs with the use of the U.S. EPA air RSL values for more than half of the VOCs reviewed to date. However, to incorporate CalEPA toxicity criteria and HERO recommendations (e.g. route-to-route extrapolation), HERO has calculated DTSC-modified residential and industrial air screening levels for: 1) VOCs in which use of the CalEPA-recommended inhalation unit risk (IUR) and/or chronic inhalation reference exposure level (REL) is more protective than the values used to derive the RSLs and 2) VOCs present in the RSL table but lacking cancer and/or noncancer air RSLs due to the lack of route-to-route extrapolation when deriving the RSLs. The DTSC-modified air screening levels for such VOCs are presented in reference Table 3. For all constituents other than those listed in Table 2, the DTSC site toxicologist should be consulted prior to using the U.S. EPA air RSLs.

WHAT'S NEW

- Subsequent to our May 21, 2013 iteration of HHRA Note 3, U.S. EPA released a complete set of updated RSL tables dated May 2013. In June 2013, U.S. EPA also revised a subset of the tables based on a target hazard quotient (HQ) equal to 0.1 to correct an error in those corresponding May 2013 tables. Because HHRA Note 3 recommendations are for tables based on a HQ of 1, the May 2013 tables are the most recent versions relevant for this HHRA Note. In general, HERO does not recommend use of screening levels based on a target HQ of 0.1. Instead, screening levels based on a target HQ of 1 should be used, and cumulative noncancer hazard should be summed across all site-related contaminants, media, and exposure pathways.

- As a continuation of our Phase I and II RSL review addressed in previous iterations of HHRA Note 3, HERO has reviewed the RSL table updates from May 2013, as well as other relevant information including updated CalEPA criteria. This revised HHRA Note 3 incorporates our updated recommendations for use of the RSLs.

- HERO continued the development of DTSC-modified air screening levels with the calculation of residential use air screening values for methylene chloride, 1,2,3-trichloropropane (1,2,3-TCP) and vinyl chloride. Age-Dependent Adjustment Factors (ADAFs) were used for the air screening values for methylene chloride and 1,2,3-TCP as these are identified as mutagens by the U.S. EPA in their RSL table. ADAFs were not applied for vinyl chloride in this HHRA Note 3 as vinyl chloride is currently under review.

- In previous versions of HHRA Note 3, HERO calculated DTSC-modified screening levels for cadmium and beryllium in soil. For consistency with DTSC's HHRA Note 1 and the Interim Final – Revised October 2013 Preliminary Endangerment Assessment (PEA) Guidance Manual, the DTSC-modified screening levels have been recalculated herein using DTSC's default dermal exposure parameters and assuming a gastrointestinal absorption fraction (GIABS) of 1 ((http://www.dtsc.ca.gov/AssessingRisk/upload/HHRA_Note1.pdf; http://www.dtsc.ca.gov/SiteCleanup/Brownfields/upload/Preliminary-Endangerment-Assessment-Guidance-Manual.pdf). The revised DTSC-modified screening levels for cadmium in soil based on noncancer endpoints are now 4.6 mg/kg and 6.4 mg/kg for residential and industrial land use scenarios. These values are slightly higher than the previously calculated DTSC-modified screening levels of 4 and 5.1 mg/kg, respectively. The revised DTSC-modified screening levels for beryllium are now 15 mg/kg and 180 mg/kg for residential and industrial land use scenarios. These values are slightly lower than the previously calculated DTSC-modified screening levels of 16 mg/kg and 200 mg/kg.

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BACKGROUND

HERO has a long history of working with the U.S. EPA Region 9 office to integrate California-specific risk assessment concerns into the Preliminary Remediation Goal (PRG) listing and the PRG-screening risk assessment process. One example of the collaboration was the inclusion of 'Cal-modified' values into the U.S. EPA Region 9 PRG list. When the U.S. EPA Region 9 PRG was greater by a factor of 4 or more than the value which would have been obtained with the corresponding California-specific toxicity value, U.S. EPA Region 9 added a 'Cal-modified' PRG to the PRG list based on California-specific cancer toxicity values.

In the past, the U.S. EPA Region 9 PRGs have been used by HERO primarily at open, closing, and formerly-used Department of Defense (DoD) sites. Screening risk assessments at some non-military sites have in the past used a different process. However, the recommendations included in this report are being used and are intended for use at any DTSC site where DTSC has approved the use of PRGs or RSLs.

In 2008, U.S. EPA released Regional Screening Levels (RSLs) (*http://www.epa.gov/region09/superfund/prg/rsl-table.html*) which replaced the U.S. EPA Region 9 PRGs. HERO conducted and anticipates continuing an ongoing process of reviewing the new U.S. EPA RSLs, which are planned for release on a biennial basis (Spring and Fall), and their application in screening risk assessment.

Differences between the methodologies used to develop the 2008 RSLs and the U.S. EPA Region 9 PRGs include the following:

- Incorporation of new inhalation exposure equations per U.S. EPA Risk Assessment Guidance for Superfund (RAGS) Part F (2009);
- Presentation of industrial air screening values in addition to residential screening values;
- Discontinuing the use of route-to-route extrapolations between the oral and inhalation routes of exposure to derive toxicity values where a toxicity value exists for only one route of exposure (route-to-route extrapolations are still conducted for evaluating dermal exposures);
- Discontinuing adjustments for soil saturation with the listing of strictly risk-based RSLs;
- Discontinuing the use of the "ceiling limit" concentration of $1x10^{+5}$ mg/kg (max) with the listing of strictly risk-based RSLs; and,
- Application of age-dependent adjustment factors to address early-life exposures for agents with a mutagenic mode of action for carcinogenesis per U.S. EPA Supplemental Guidance for Assessing Susceptibility from Early-Life Exposure to Carcinogens (2005).

Additional modifications to the RSL methodology have been made subsequent to the initial 2008 RSL tables, and we have incorporated these changes in our discussion below. For example, the dermal exposure pathway has been incorporated into the tapwater RSL calculation.

For reference, the RSL Users Guide (http://www.epa.gov/reg3hwmd/risk/human/rb-concentration_table/usersguide.htm) lists the following uses (Section 3.0) for the U.S. EPA RSLs:

"*These concentrations can be used for:*

- *Prioritizing multiple sites or operable units or areas of concern within a facility or exposure units*
- *Setting risk-based detection limits for contaminants of potential concern (COPCs)*
- *Focusing future site investigation and risk assessment efforts (e.g., selecting COPCs for the baseline risk assessment)*
- *Identifying contamination which may warrant cleanup*
- *Identifying sites, or portions of sites, which warrant no further action or investigation*
- *Initial cleanup goals when site-specific data are lacking"*

RSLs are NOT to be used to perform a human health Baseline Risk Assessment (BRA), but to assist in the tasks preceding a human health BRA.

There are approximately 750 elements, compounds and mixtures listed in the RSL table posted as the May 2013 version. HERO plans a phased review of the RSLs as resources allow. As discussed in previous revisions of HHRA Note 3, the Phase I review provides recommendations on the use of RSLs for soil (residential use and industrial/commercial use) and tapwater only. Soil and tapwater RSLs were initially selected for priority review because: 1) they are more commonly used in HERO risk assessment review as compared to the air risk-based concentrations; and 2) toxicity values derived via the oral pathway are more prevalent than toxicity values derived via the inhalation pathway, thus, resulting in fewer elements, compounds and mixtures without residential and industrial soil and tapwater RSLs due to lack of toxicity values. Phase II review (first incorporated into the May 2013 revision of HHRA Note 3) provides recommendations on the use of residential and industrial air RSLs for a subset of volatile organic compounds (VOCs). The subset of VOCs selected for priority review are frequently found at California hazardous waste sites and permitted facilities and evaluated for vapor intrusion to indoor air. HERO plans to review the air RSLs for the remaining constituents listed in the RSL tables as time allows. In the interim, the DTSC site toxicologist can be contacted for recommendations on use of air RSLs for constituents which are not addressed in HHRA Note 3.

EPA REGION 9 'CAL-MODIFIED' PRGS

HERO originally agreed to the use of U.S. EPA Region 9 PRGs to expedite human health screening at DoD bases, facilities and sites. This agreement was arrived at after HERO review of the proposed Region 9 PRGs and inclusion of the small number of 'Cal-modified' values, where CalEPA Office of Environmental Health Hazard Assessment (OEHHA) determination of carcinogenicity, pathway-specific carcinogenicity and/or the magnitude of the CalEPA cancer toxicity value resulted in a calculated 'Cal-modified' PRG which was significantly less (i.e., more than a factor of 4 lower) than those listed in the U.S. EPA Region 9 PRG tables.

'Cal-modified' listings have been dropped from the RSL table. As such, in the absence of 'Cal-modified' RSLs, this HHRA Note includes reference Table 1 for compounds with soil and tapwater RSLs for which 1) the 2004 PRG should be used; 2) the 2004 'Cal-modified' PRG should be used; or 3) the DTSC-modified screening levels derived using the RSL on-line screening calculator should be used. Alternatively, Cal-modified PRGs for specific chemicals can be derived using the on-line calculator included as part of the RSL package (http://epa-prgs.ornl.gov/cgi-bin/chemicals/csl_search). This HHRA Note also includes reference Table 2 addressing air RSLs for a subset of VOCs. Table 2 presents a complete listing of the VOCs reviewed by HERO, along with HERO recommendations regarding use of the air RSLs or alternate DTSC-modified screening levels which are located in Table 3. For all constituents other than those listed in Tables 2, the DTSC site toxicologist should be consulted prior to using the air RSLs.

In a memorandum dated October 28, 1994, HERO recommended guidelines for use of the Region 9 PRGs at DoD sites (http://www.dtsc.ca.gov/AssessingRisk/upload/PRG-HERD-Memorandum-OCT-1994.pdf). More recently, HHRA Note Number 4 was released (http://www.dtsc.ca.gov/AssessingRisk/humanrisk2.cfm#guidance), as an update of the 1994 HERO memorandum for consistency with the replacement of PRGs with RSLs and to address more recent screening risk assessment guidance. In general, HERO recommends compliance with the "basic" approach and principles outlined in the referenced memorandum. This includes the provision that PRGs (now RSLs) are used for screening sites as a whole, not for "screening out" individual chemicals. Ratios of the concentration of a particular chemical in a medium (e.g. soil, water, or air) to its risk-based concentration are calculated and the ratio is summed across all chemicals and media to estimate a total risk and hazard for the site. Prior to making risk management decisions based on the results of such an evaluation, it is critical that limitations associated with the use of PRGs (now RSLs) be carefully noted and understood. For example, the derivation of the PRGs and RSLs did not include an evaluation of the intrusion of vapors from the subsurface to indoor air (see below for a more detailed discussion of exposure pathways). The vapor intrusion of volatile chemicals in soil or groundwater to indoor air has become recognized as potentially a major exposure pathway and is receiving increasing attention in risk assessments. It is also important to understand that ecological receptors were not considered in the calculation of the PRGs and RSLs. The PRGs and RSLs apply only to human receptor exposure scenarios only and are NOT necessarily protective of ecological receptors.

In the past, use of the U.S. EPA Region 9 PRG table (with 'Cal-modified' values) at California sites has expedited site assessment and cleanup, resulting in faster cleanups and cost savings. We hope that following incorporation of adjustments such as the application of California toxicity criteria, where appropriate, the RSLs can play a similar role.

CONCEPTUAL SITE MODEL AND INCLUDED EXPOSURE PATHWAYS

Before using the RSLs to conduct a screening level human health risk assessment, development of a site-specific conceptual site model (CSM) is critical to ensure all appropriate receptors and exposure pathways are addressed by the RSLs.

The risk-based residential and industrial soil RSLs consider several exposure pathways: ingestion, inhalation of particles and volatile chemicals in ambient air, and dermal absorption.

The tapwater RSLs are based on assumed residential exposure to water via ingestion from drinking, inhalation of volatile chemicals generated during household use (e.g. showering, dish washing), and dermal exposure.

Although the soil and tapwater RSLs account for many typical exposure pathways, similar to the previous 2004 PRGs, they do not account for the following potential exposure pathways (discussed in the User's Guide and Background Technical Document for U.S. EPA Region 9's PRG Table, http://www.epa.gov/region09/superfund/prg/files/04usersguide.pdf):

- The residential and industrial soil RSLs do not account for exposure to indoor air vapors due to intrusion of subsurface soil gas emissions; ingestion via uptake of plants (home-grown fruits and vegetables), meat, or dairy products; or inhalation of particles (fugitive dust) generated by activities which elevate particulate emissions such as truck traffic and use of heavy equipment.
- Pathways not considered in the calculation of the tapwater RSLs include subsurface vapor intrusion to indoor air from VOCs present in groundwater and transfer of contaminants in the water column to aquatic organisms or terrestrial plants with subsequent ingestion by humans. The RSL on-line calculator and User's Guide do however include equations which can be used to calculate screening level fish concentrations assuming human consumption of fish. These equations do not address impacts to fish; but rather, human consumption of fish which may be contaminated. The RSL on-line calculator and User's Guide also provides equations which can be used to evaluate recreational receptor exposures to soil/sediment and surface water.

If pathways not considered in the derivation of the soil and tapwater RSLs are anticipated at the site (e.g. home-grown produce consumption), an RSL-based screening level risk evaluation may significantly underestimate risk. In addition, if there are exposure scenarios other than residential and industrial land use, a screening level risk evaluation using RSLs may not be appropriate (e.g. sites in which trench workers may be exposed to shallow groundwater). In such cases, the evaluation of risk to human receptors at the site should proceed with the baseline human health risk assessment process. In other instances, the screening risk assessment may overestimate risk. In these cases, preparation of a baseline human health risk assessment is an option. For reference, HERO has compiled a summary of recommended exposure factors which may be used as default values in baseline human health risk assessments for California hazardous waste sites

and permitted facilities (DTSC HHRA Note 1, http://dtsc.ca.gov/AssessingRisk/upload/HHRA_Note1.pdf).

Additional Considerations Regarding the Use of Industrial RSLs

The tapwater RSLs are calculated using residential land use assumptions. As such, these RSLs are not reflective of industrial exposures and may overestimate exposures via the water pathways.

Screening level evaluations using the industrial soil RSLs do not account for the following pathways: all uses of groundwater; exposure via vapor intrusion to indoor air; exposure to contaminated surface and ground water, and inhalation of particulates generated by activities which increase particulate levels such as truck traffic and use of heavy equipment. If these exposure pathways are significant at a site, screening risk assessment using RSLs is generally not appropriate. In some cases it may be possible, with the cooperation of the DTSC toxicologist, to incorporate the risk from the vapor intrusion pathway into the screening risk assessment by adding the risk from this pathway into the risk estimated from the use of the RSL(s).

SITE SCREENING – SOIL AND TAPWATER CONTAMINANTS, AND LIMITED VOC CONTAMINANTS IN AIR

As discussed above, HERO plans to review the soil, tapwater, and air RSLs in a phased approach. The results of our updated Phase I review are summarized below and provide recommendations on the use of RSLs for soil (residential use and industrial/commercial use) and tapwater. The results of our Phase II recommendations on the use of air RSLs for a subset of VOCs which are frequently detected at California hazardous waste sites and permitted facilities and evaluated for vapor intrusion to indoor air are also presented.

The U.S. EPA RSL "What's New" summary posted online in May 2013 states that new tables are now provided by U.S. EPA with target hazard quotients (THQ) of 1.0 and 0.1. The RSL website states that the rationale for using a THQ of 0.1 for screening is that if 10 chemicals were at a site and all narrowly passed a screening at THQ=1.0, the resulting total HI could actually be 10.

In general, HERO does not recommend use of screening levels based on a target HQ of 0.1. Instead, screening levels based on a target HQ of 1 should be used, and cumulative noncancer hazard should be summed across all site-related contaminants, media, and exposure pathways. For these reasons, the following HHRA Note 3 recommendations are specifically for screening levels based on a HQ of 1.

Soil and Tapwater

While it is possible to use the on-line screening calculator (http://epa-prgs.ornl.gov/cgi-bin/chemicals/csl_search) supplied as part of the U.S. EPA RSL process and employ the California-recommended toxicity values for each exposure pathway, this would be a laborious process for DTSC Project Managers and contractors for Responsible Parties. To address this difficulty, during our initial Phase I review HERO prepared a copy of the U.S. EPA RSL worksheet in which the U.S. EPA Region 9 2004 soil and tapwater PRGs (including 'Cal-modified' PRGs) and California criteria were inserted. HERO then identified elements, compounds and mixtures in which the soil and tapwater RSLs differed significantly (i.e. greater by a factor of 4-fold or more) from the 2004 PRGs (including Cal-modified PRGs) and California values. In most cases, the differences for soil were due to the deletion of the adjustment for saturation or ceiling limit, updates in toxicity values, the lack of extrapolation between the oral and inhalation pathways in deriving the RSLs, or changes in physical/chemical parameters, including molecular weight. Most of the differences for tapwater were due to updates in toxicity values and the lack of extrapolation between the oral and inhalation exposure pathways in deriving the RSLs.

HERO reviewed each analyte in which the soil and tapwater RSLs differed significantly from the 2004 PRGs and California values to determine whether we agree that use of the newer RSLs for site screening is health protective. In general, with the exception of the chemicals listed Table 1, HERO finds it acceptable to use the soil and tapwater RSLs for compounds in which the differences are due to the deletion of the adjustment for saturation or ceiling limit (applicable to soil values only), updates in toxicity values, and changes in physical/chemical parameters. However, the DTSC Project Managers should be aware that the RSL soil values are strictly risk-based. The RSLs do not consider physical limitations such as soil saturation and the RSLs for some chemicals exceed 10% (i.e., >100,000 ppm). In addition, HERO is concerned with the lack of route to route extrapolation between the oral and inhalation exposure pathways, particularly for compounds in which CalEPA OEHHA lists both an oral cancer slope factor and inhalation unit risk factor. Generally, we recommend that such extrapolations be conducted, particularly for organic compounds in which systemic effects are known to occur and significant portal of entry effects are not anticipated.

Subsequent to our May 2013 revision of this HHRA Note, HERO has reviewed the changes made to the current May 2013 version of the RSL tables. In Table 1 below, HERO lists recommended alternate values that should be used in lieu of the soil and tapwater RSLs. Please note that HERO recommendations, as contained in Table 1, are evolving and may change in the future with additional compounds either being added or deleted.

Although we have identified a sizable number of compounds, as listed in Table 1, only a small number of these are frequently found at California hazardous waste sites and permitted facilities.

The HERO recommendations outlined here (with the exception of the elements and compounds discussed in the following section) reflect that for the greater number of compounds listed in the RSL tables, the soil and tapwater RSLs may be used. It is also important to note that many of the compounds listed in Table 1 are VOCs. If VOCs are present at a site, soil gas data are required to evaluate the vapor intrusion to indoor air pathway. This allows a more comprehensive evaluation because the derivation of the soil and tapwater RSLs and PRGs do not consider the vapor intrusion pathway, which is often the risk driver.

Air.

Subsurface vapor intrusion to indoor air from volatile chemicals in soil or groundwater has become recognized as a potentially major exposure pathway. The air RSLs address residential and industrial ambient air exposure scenarios, and may be used for screening VOC concentrations in indoor air. The air RSLs for VOCs also have potential applications for screening soil gas data when used in concert with an appropriate attenuation factor as described in DTSC's 2011 Guidance for the Evaluation and Mitigation of Subsurface Vapor Intrusion to Indoor Air (http://www.dtsc.ca.gov/AssessingRisk/upload/Final_VIG_Oct_2011.pdf). (DTSC-recommended default attenuation factors for preliminary screening evaluations can be found in DTSC's 2011 Vapor Intrusion guidance). For detailed recommendations on the vapor intrusion to indoor air pathway and evaluation of soil gas and indoor air data, please consult DTSC's 2011 Vapor Intrusion guidance, or contact the DTSC site toxicologist to ensure use of the air RSLs on a site-specific basis is appropriate.

To facilitate site screening, HERO's Phase II review provides recommendations on use of air RSLs for a subset of the VOCs that are often present at California hazardous waste sites and permitted facilities. A complete listing of the VOCs reviewed by HERO, and HERO recommendations for these chemicals are presented in reference Table 2. For all constituents other than those listed in Table 2, the DTSC site toxicologist should be consulted prior to using the air RSLs.

HERO's Phase II review is based on a comparison of the inhalation toxicity criteria used to derive the air RSLs relative to CalEPA toxicity criteria and HERO recommendations (e.g. route-to-route extrapolation). For chemicals in which use of CalEPA-recommended criteria is more protective, HERO used the RSL on-line screening calculator to derive alternate values which should be used in lieu of the U.S. EPA air RSLs. These DTSC-modified values are presented in reference Table 3, and were calculated using the more health protective of toxicity criteria from CalEPA and the RSL tables. As shown in Table 3, HERO also used the RSL on-line screening calculator to derive DTSC-modified air screening levels for VOCs where cancer and/or noncancer RSLs are unavailable due to a lack of route-to-route extrapolation when deriving the U.S. EPA RSLs. Again, HERO recommendations, as contained in Tables 2 and 3 below, are evolving and may change in

the future with additional compounds being added and potential revisions to the recommended screening levels for individual compounds.

One exception to the general HERO methodology used to derive DTSC-modified air screening levels is vinyl chloride under the residential land use scenario. Because the on-line RSL screening calculator utilizes a special equation for residential exposures to vinyl chloride in air, HERO did not use the on-line RSL calculator to derive the DTSC-modified residential air screening level for this volatile. Instead, HERO calculated the vinyl chloride risk-based residential air screening level using Equation 4.8.2 (Carcinogenic, Resident Air) from the RSL User's Guide. The on-line RSL calculator was used to develop the DTSC-modified residential air screening concentration for methylene chloride, 1,2,3-TCP

DISCUSSION AND RECOMMENDATIONS FOR SPECIFIC CONTAMINANTS

1. **Lead (Soil).** In 2007, CalEPA OEHHA developed a new toxicity evaluation of lead replacing the 10 µg/dL threshold blood lead concentration with a source-specific "benchmark change" of 1 µg/dL (http://oehha.ca.gov/public_info/public/kids/pdf/PbHGV041307.pdf). One µg/dL is the estimated incremental increase in children's blood lead that would reduce Intelligence Quotient (IQ) by up to 1 point. In light of the updated CalEPA lead toxicity criterion, as well as the need for revision to ensure that the model is adequately protective of women of child-bearing age, a new version of the DTSC LEAD RISK ASSESSMENT SPREADSHEET (LeadSpread 8; 2011) has been developed (http://www.dtsc.ca.gov/AssessingRisk/LeadSpread8.cfm).

   Worksheets 1 and 2 of the LeadSpread 8 file include PRG90 calculations for residential and industrial land use scenarios, respectively. The PRG90s represent concentrations in soil that will result in a 90th percentile estimate of a 1ug/dl increase in blood lead in a child or the fetus of a pregnant adult worker equal. While DTSC has historically used the 99th percentile estimate of blood lead, HERO considers the 90th percentile of the distribution appropriate for use in evaluating lead exposures given that the target blood lead (PbB) level of concern was updated to the more recent health-protective criterion of 1 ug/dL.

   Use of PRG90s is a departure from the previously utilized Cal-modified USEPA Region 9 PRG values of 150 mg/kg for residential land use and 800 mg/kg for industrial land use. HERO implements the risk-based soil concentrations as a residential use (i.e., unrestricted use) scenario Exposure Point Concentration (EPC), calculated as the 95 percent upper confidence limit on the arithmetic mean (95% UCL) of 80 mg/kg or less soil lead and an industrial/commercial use 95% UCL of 320 mg/kg or less soil lead. With regard to assessment of lead risk and evaluating cleanup options, if sufficient data are available, HERO recommends calculating the 95% UCL lead concentration for each exposure area. If individual samples exceed the PRG90, it would not mean that the exposure area itself is in exceedance of the PRG90 as long as the 95% UCL itself is below ~80 mg/kg for residential and ~320 mg/kg for

industrial/commercial, assuming hot spots are not present. If "hot spots" (i.e., geographically collocated areas of elevated concentration), or "outliers" (i.e., individual samples with elevated concentrations) are present, they must be addressed separately.

For initial site screening where data are insufficient to calculate a 95% UCL, comparison of the maximum detected concentration to the PRG90s would be appropriate. If individual sample results exceed the PRG90s, depending on site-specific conditions and sampling results, additional investigation, evaluation, and potentially remediation may be warranted to address concerns about lead exposure.

It is important to note that background exposures to lead, and media other than soil which may be impacted by lead are not considered in LeadSpread8. If lead is present at levels above background in media other than soil (e.g. water, air), or if the home grown produce pathway is anticipated at the site, please contact the HERO toxicologist. DTSC's LeadSpread model is currently undergoing additional revision, and we hope to incorporate additional exposure pathways and environmental media in the near future.

2. **Cadmium (Soil).** The cadmium soil and tapwater RSLs based on noncancer effects were calculated using the U.S. EPA Integrated Risk Information System (IRIS) oral reference dose (RfDo) for food (1 µg/kg-day) and water (0.5 µg/kg-day), respectively. However, the 2006 Cal/EPA OEHHA public health goal (PHG) for cadmium is based on a more health protective oral acceptable daily intake level than the current U.S. EPA RfDs. Specifically, the acceptable daily dose (ADD) used by OEHHA to derive their PHG was 0.0063 µg/kg-day.

   To address the more health protective CalEPA toxicity criterion for cadmium, HERO used the on-line calculator to estimate DTSC-modified soil screening levels for this constituent. Please consult Appendix A for a listing of key inputs used to derive the DTSC screening levels.
   For residential scenarios, risk-based soil concentrations based on noncancer effects are generally calculated for the first six years of childhood based on an assumption that children have higher estimated exposure rates than adults because of factors such as a lower body weight and higher soil ingestion rate. For cadmium, HERO has reviewed the CalEPA OEHHA PHG document; and at this time, we consider a 30-year adult residential scenario appropriate for calculating a risk-based soil concentration to address noncancer effects. As discussed in the PHG document, cadmium accumulates rapidly in the kidney during the first decades of life and then approaches a plateau around age 40 to 50. The PHG is derived from a daily cadmium intake based on toxicokinetic studies in adults and assumes accumulation of cadmium over approximately 50 years. The no observed adverse effect level (NOAEL) identified by OEHHA is also based on a very sensitive indicator of renal toxicity, and the ADD incorporates an overall uncertainty factor of 50. First, an uncertainty factor of 5 was used to address sensitive individuals (principally uncertainties due to limited information on the toxicokinetics of cadmium,

particularly in women). An additional uncertainty factor of 10 was used to address potential cancer risk due to oral exposure to cadmium since no oral studies were considered suitable for estimating the oral cancer potency for cadmium.

Applying the CalEPA ADD (6.3E-6 mg/kg-day) and May 2013 RSL table inhalation RfC (1E-5 mg/m^3; Source ATSDR) with a 30-year adult residential exposure scenario, DTSC default dermal exposure parameters, and an assumed GIABS of 1, the DTSC-modified screening level for residential soil based on noncancer effects was calculated to be approximately 4.6 mg/kg. The DTSC-modified screening level for industrial soil based on noncancer effects was calculated to be 6.4 mg/kg. Applying the CalEPA inhalation unit risk factor of 4.2E-3 per $\mu g/m^3$, the DTSC-modified screening levels for residential and industrial soil based on cancer are 790 mg/kg and 4000 mg/kg, respectively. Therefore, the noncancer-based values of 4.6 mg/kg and 6.4 mg/kg were selected as screening levels for residential and industrial soil, respectively.

Please note that the DTSC-modified soil screening levels presented herein represent HERO's current thinking on screening level criteria for cadmium in soil. Based on newer data and potential updates to cadmium toxicity criteria, HERO's review of relevant information for this contaminant is ongoing and we may derive updated DTSC-modified screening levels in the future. At this time we have not derived tapwater screening levels for cadmium, however, we may do so as part of a future revision. In the interim, please consult with the DTSC toxicologist for sites where cadmium is a site-related contaminant in water.

3. **Beryllium (Soil).** While the 2004 PRGs and Fall 2012 RSLs for beryllium and compounds in soil and tapwater are less than 4-fold different, CalEPA toxicity criteria for beryllium differ from current U.S. EPA values in some regards. For cancer, the U.S. EPA inhalation unit risk (2.4E-3 per $\mu g/m^3$) is the same as CalEPA's inhalation unit risk for beryllium and beryllium oxide. However, CalEPA also has a separate inhalation unit risk specifically for beryllium sulfate (8.6E-1 per $\mu g/m^3$). For noncancer, the U.S. EPA RfDo (2E-3 mg/kg-day) is 10-fold higher than the noncancer toxicity criterion used by CalEPA OEHHA to derive the PHG for beryllium and beryllium compounds (2E-4 mg/kg-day). In addition, the U.S. EPA inhalation reference concentration (RfC) for beryllium and compounds (2E-5 mg/m^3) is higher than the OEHHA chronic inhalation reference level (REL) for beryllium and compounds (7E-6 mg/m^3).

   To address the more health protective CalEPA OEHHA toxicity criteria for beryllium, HERO used the on-line calculator with DTSC default dermal exposure parameters and an assumed GIABS of 1to estimate DTSC-modified soil screening levels for beryllium and compounds (including beryllium oxide). Separate DTSC-modified screening levels based on cancer were also derived for beryllium sulfate due to difference in the inhalation unit risk for this form of beryllium. Please consult Appendix A for a listing of key inputs used to derive the DTSC screening levels.

For beryllium and compounds, applying the CalEPA OEHHA inhalation unit risk (2.4E-3 per $\mu g/m^3$), RfDo-equivalent from the PHG document (2E-4 mg/kg-day), and chronic REL (7E-6 mg/m^3), the DTSC-modified screening levels for soil based on noncancer effects were calculated to be approximately 15 mg/kg and 180 mg/kg for residential and industrial land use, respectively. For cancer, the DTSC-modified screening levels for beryllium and compounds in soil were calculated to be 1400 mg/kg and 7000 mg/kg under the residential and industrial land use scenarios, respectively.

For beryllium sulfate, applying the CalEPA inhalation unit risk (8.6E-1 per $\mu g/m^3$) results in DTSC-modified screening levels for soil based on cancer of 3.9 mg/kg and 19 mg/kg (residential and industrial land uses, respectively). For noncancer endpoints, the DTSC-modified screening levels for beryllium and compounds in soil (discussed above) can be used since the only CalEPA criterion specific for beryllium sulfate is the inhalation unit risk. Similar to cadmium above, at this time we have not derived tapwater screening levels for beryllium. Please consult with the DTSC toxicologist for sites where beryllium is a site-related contaminant in water.

ACCOMPANYING TABLE 1

For expediency, HERO has not calculated "Cal-modified" RSLs for all compounds included in Table 1. In the interim, HERO recommends that evaluations of compounds in soil and tapwater apply the 2004 PRGs, the 2004 'Cal-modified' PRGs, and DTSC-modified screening levels for elements, compounds and mixtures listed in Table 1. Alternatively, in consultation with HERO, the on-line screening calculator can be used to calculate site-specific values using the more protective of CalEPA and U.S. EPA toxicity values and applying assumptions consistent with HERO recommendations (e.g. route-to-route extrapolation between the oral and inhalation exposure pathways where no toxicity value is available for the inhalation route of exposure but an oral toxicity value is available).

Also included in Table 1 are elements, compounds and mixtures that were included in the 2004 PRG tables, but had no corresponding RSLs available. In the absence of newer screening levels, HERO recommends that the 2004 soil and tapwater PRGs be used for evaluating these compounds if present at a site.

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Table 1, Page 1. Alternate soil and tapwater screening values currently recommended in lieu of the Spring 2013 RSLs.

Analyte	CAS Number	U.S. EPA Region 9 PRGs (2004)						'Cal-modified' 2004 U.S. EPA Region 9 PRGs (2004)						RSL Calculator Risk-based Concentration						
		Residential Soil		Industrial Soil		Tapwater		Residential Soil		Industrial Soil		Tapwater		Residential Soil		Industrial Soil		Tapwater		
		Cancer PRG (mg/kg)	Noncancer PRG (mg/kg)	Cancer PRG (mg/kg)	Noncancer PRG (mg/kg)	Cancer PRG (µg/L)	Noncancer PRG (µg/L)	Cancer PRG (mg/kg)	Noncancer PRG (mg/kg)	Cancer PRG (mg/kg)	Noncancer PRG (mg/kg)	Cancer PRG (µg/L)	Noncancer PRG (µg/L)	Cancer PRG (mg/kg)	Noncancer PRG (mg/kg)	Cancer PRG (mg/kg)	Noncancer PRG (mg/kg)	Cancer PRG (µg/L)	Noncancer PRG (µg/L)	FOOTNOTE
Acrylonitrile	107-13-1							5.50E-02	NA	1.20E-01	NA									2
Aminodinitrotoluenes	1321-12-6		1.20E+01		1.20E+02		7.30E+00													6
Aminopyridine, 4-	504-24-5		1.20E+00		1.20E+01		7.30E-01													6
Arsenic, Inorganic	7440-38-2							6.20E-02	NA	2.50E-01	NA	7.10E-03	NA*							2, 5
Benzo[k]fluoranthene	207-08-9							3.80E-01	NA	1.30E+00	NA	5.60E-02	NA*							2, 5
Beryllium and compounds	7440-41-7													1.38E+03	1.52E+01	6.95E+03	1.83E+02			3, 7
Butadiene, 1,3-	106-99-0							1.10E-02	8.40E+00	2.30E-02	2.80E+01									2
Butylbenzene, n-	104-51-8		2.4E+02 (sat) 5.80E+02		2.4E+02 (sat) 2.20E+03															1
Butylbenzene, sec	135-9-88		2.2E+02 (sat) 4.50E+02		2.2E+02 (sat) 1.60E+03		2.40E+02													6
Butylbenzene, tert-	98-06-6		3.9E+02 (sat) 5.30E+02		3.9E+02 (sat) 2.00E+03															1
Cadmium	7440-43-9													7.88E+02	4.58+00	3.97E+03	6.37E+00			3
Carbazole	86-74-8	2.40E+01	NA	8.60E+01	NA	3.40E+00	NA													6
Carbon Tetrachloride	56-23-5			5.50E-01																1
Chloroacetophenone, 2-	532-27-4		3.30E-02		1.10E-01		5.20E-02													1, 6
Chlorobutane, 1-	109-69-3		4.8E+02 (sat) 7.10E+02		4.8E+02 (sat) 2.40E+03															1
Chloronitrobenzene, p-	100-00-5					1.70E+00	1.20E+00													4
Chlorophenol, 2-	95-57-8		6.30E+01		2.40E+02															1
Chloropropane, 2-	75-29-6		1.70E+02		5.90E+02		1.70E+02													6
Chlorotoluene, o-	95-49-8		1.60E+02		5.60E+02															1
Chrysene	218-01-9							3.80E+00	NA	1.30E+01	NA	5.60E-01	NA*							2, 5
Crotonaldehyde, trans-	123-73-9	5.30E-03	NA	1.10E-02	NA	5.90E-03	NA													1, 4
Cyanogen Bromide	506-68-3		2.90E+02		9.70E+02															1
Cyanogen Chloride	506-77-4		1.60E+02		5.40E+02															1
Dichlorobenzene, 1,3-	541-73-1		5.30E+02		6.0E+02 (sat) 2.10E+03		1.80E+02													6
Dichloromethane (Methylene chloride)	75-09-2	9.1E+00		2.1E+01		4.3E+00														1, 4
Dicofol	115-32-2	1.10E+00	NA	3.90E+00	NA	1.50E-01	NA													6
Diisononyl phthalate	28553-12-0		1.20E+03		1.20E+04		7.30E+02													6
Dimethyl phthalate	131-11-3		1.0E+05 (max) 6.10E+05		1.0E+05 (max) 6.20E+06		3.60E+05													6
Dimethylamine	124-40-3		6.70E-02		2.50E-01		3.50E-02													6
di-n-Octyl phthalate	117-84-0		2.40E+03		2.50E+04		1.50E+03													1
Dysprosium	7429-91-6		7.80E+03		1.0E+05 (max) 1.00E+05		3.60E+03													6
Epichlorohydrin	106-89-8							1.30E+00	NA	2.90E+00	NA	1.40E-01	NA*							2, 5
Ethyl Acetate	141-78-6		1.90E+04		3.7E+04 (sat) 7.60E+04		5.5+03													1, 4
Ethyl Acrylate	140-88-5	2.10E-01	NA	4.50E-01	NA	2.30E-01	NA													1, 4
Ethyl Ether	60-29-7		1.8E+03 (sat) 6.80E+03		1.8E+03 (sat) 3.30E+04															1

Table 1, Page 2. Alternate soil and tapwater screening values currently recommended in lieu of the Spring 2013 RSLs.

Analyte	CAS Number	U.S. EPA Region 9 PRGs (2004)						'Cal-modified' 2004 U.S. EPA Region 9 PRGs (2004)						RSL Calculator Risk-based Concentration						
		Residential Soil		Industrial Soil		Tapwater		Residential Soil		Industrial Soil		Tapwater		Residential Soil		Industrial Soil		Tapwater		
		Cancer PRG (mg/kg)	Noncancer PRG (mg/kg)	Cancer PRG (mg/kg)	Noncancer PRG (mg/kg)	Cancer PRG (µg/L)	Noncancer PRG (µg/L)	Cancer PRG (mg/kg)	Noncancer PRG (mg/kg)	Cancer PRG (mg/kg)	Noncancer PRG (mg/kg)	Cancer PRG (µg/L)	Noncancer PRG (µg/L)	Cancer PRG (mg/kg)	Noncancer PRG (mg/kg)	Cancer PRG (mg/kg)	Noncancer PRG (mg/kg)	Cancer PRG (µg/L)	Noncancer PRG (µg/L)	FOOTNOTE
Furan	110-00-9		2.50E+00		8.50E+00															1
Hexamethylene Diisocyanate, 1,6-	822-06-0		1.70E-01		1.80E+00															1
Hydrazine, 1,1-dimethyl	57-14-7	1.60E-01	NA	5.70E-01	NA	2.20E-02	NA													1, 4
Hydrogen Sulfide	7783-06-4						1.10E+02													4
Lead and Compounds	7439-92-1							See text for discussion												
Maleic Hydrazide	123-33-1		1.70E+03		2.4E+03 (sat) 5.60E+03															1
Maneb	12427-38-2	8.10E+00	3.10E+02	2.90E+01	3.10E+03	1.10E+00	1.80E+02													1, 4
Mercaptobenzothiazole, 2-	149-30-4	1.70E+01	6.10E+03	5.90E+01	6.20E+04	2.30E+00	3.60E+03													6
Methomyl	16752-77-5		4.40E+01		1.50E+02															1
Methyl Acetate	79-20-9				9.20E+04															1
Methyl Acrylate	96-33-3		7.00E+01		2.30E+02															1
Methyl Mercaptan	74-93-1		3.50E+01		3.50E+02		2.10E+01													6
2-(2-Methyl-1,4-chlorophenoxy) propionic acid	16484-77-8		6.10E+01		6.20E+02		3.60E+01													6
Methylcyclohexane	108-87-2		2.60E+03		8.70E+03		5.20E+03													6
Methylenediphenyl Diisocyanate	101-68-8		1.00E+01		1.00E+02		6.20E+00													1, 6
Methylstyrene, Alpha-	98-83-9		6.8E+02 (sat) 9.20E+02		6.8E+02 (sat) 3.40E+03															1
Nitroanaline, 3-	99-09-2		1.8E+01	8.2E+01		3.2E+00														6
Nitroso-di-N-butylamine, N-	924-16-3			5.80E-02	NA															1
Nitrotoluene, o-	88-72-2			2.2E+00		4.90E-02	6.10E+01													1, 4
Nitrotoluene, p-	99-99-0					6.60E-01	6.10E+01													4
Selenourea	630-10-4		3.1E+02		3.1E+03		1.8E+02													6
Tetrachloroethylene	127-18-4	4.8E-01		1.3E+00		1.0E-01														1, 4
Thiocyanate	N/A		3.10E+03		1.0E+05 (max) 3.10E+04		1.80E+03													6
Titanium	7440-32-6		1.0E+05 (max) 3.10E+05		1.0E+05 (max) 3.80E+06		1.50E+05													6
Trichlorophenol, 2,4,6-	88-06-2							6.90E+00	NA	2.50E+01	NA									2
Trichloropropane, 1,1,2-	598-77-6		7.10E+01		2.70E+02															1
Trimethylbenzene, 1,3,5-	108-67-8		2.13E+01		6.97E+01		1.23E+01													1, 4
Trimellitic Anhydride (TMAN)	552-30-7		8.60E+00		8.60E+01		5.10E+00													6

FOOTNOTES:

* NA = Not Available. Non-carcinogenic PRG not available for carcinogen.

1. Contaminants for which HERO recommends use of 2004 U.S. EPA Region 9 PRGs for soil. 2004 U.S. EPA Region 9 PRG for soil significantly more protecitve than Spring 2013 RSL.
2. Contaminants for which HERO recommends use of 2004 U.S. EPA Region 9 'Cal-modified' PRGs for soil. 'Cal-modified' PRG significantly more protective than 2004 Region 9 PRG and Spring 2013 RSL.
3. Contaminants for which HERO recommends use of the listed RSL calculator risk-based calculated concentrations. These risk-based concentrations, using the RSL calculator are significantly more protective than Spring 2013 RSLs. If beryllium or cadmium is detected in groundwater above background and determined to be a site-related contaminant contact HERO Toxicologist.
4. Contaminants for which HERO recommends use of 2004 U.S. EPA Region 9 PRGs for tapwater. EPA Region 9 2004 tapwater PRG signficantly more protective than Spring 2013 tapwater RSL.
5. Contaminants for which HERO recommends use of 2004 U.S. EPA Region 9 'Cal-modified' PRGs for tapwater. 'Cal-modified' tapwater PRG significantly more protective than EPA Region 9 tapwater PRG and Spring 2013 tapwater RSL.
6. Contaminants for which Spring 2013 RSLs are not available, but EPA Region 9 2004 PRGs are available.
7. HERO recommends use of RSL calculator risk-based concentrations above for beryllium compounds except for anhydrous beryllium sulfate (CASN 13510-49-1). See the text for beryllium sulfate.

ACCOMPANYING TABLE 2

For expediency, HERO has reviewed the air RSLs for a subset of VOCs commonly found at California hazardous waste sites and permitted facilities and evaluated for the vapor intrusion to indoor air pathway. A complete listing of the VOCs reviewed to date, and HERO recommendations are presented in Table 2 below. HERO concurs with the use of the U.S. EPA RSL values for more than half of the VOCs listed in Table 2. Exceptions for which HERO recommends use of alternate DTSC-modified screening levels (in lieu of RSLs) are noted within the table, and the DTSC-modified screening levels are presented in Table 3. For all constituents other than those listed in Table 2, the DTSC site toxicologist should be consulted prior to using the U.S. EPA air RSLs.

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Table 2. Page 1. Complete Listing of VOC U.S. EPA Air RSLs Reviewed to Date.

CAS No.	Volatile Organic Compound	Recommendation
75-07-0	**Acetaldehyde**	**See Table 3**
67-6411	Acetone	Use RSLs
75-05-8	Acetonitrile	Use RSLs
107-02-8	Acrolein	Use RSLs
107-13-1	**Acrylonitrile**	**See Table 3**
71-43-2	**Benzene**	**See Table 3**
100-44-7	Benzyl Chloride	Use RSLs
111-44-4	**Bis(2-chloroethyl)ether**	**See Table 3**
75-27-4	**Bromodichloromethane**	**See Table 3**
75-25-2	**Bromoform**	**See Table 3**
74-83-9	Bromomethane (Methyl Bromide)	Use RSLs
106-99-0	**1,3-Butadiene**	**See Table 3**
104-51-8	**n-Butylbenzene**	**See Table 3**
135-98-8	**sec-Butylbenzene**	**See Table 3**
98-06-6	**tert-Butylbenzene**	**See Table 3**
75-15-0	Carbon Disulfide	Use RSLs
56-23-5	**Carbon Tetrachloride**	**See Table 3**
126-99-8	2-Chloro-1,3-butadiene (Chloroprene)	Use RSLs
108-90-7	Chlorobenzene	Use RSLs
109-69-3	**1-Chlorobutane**	**See Table 3**
75-45-6	Chlorodifluoromethane	Use RSLs
67-66-3	Chloroform	Use RSLs
74-87-3	Chloromethane (Methyl Chloride)	Use RSLs
124-48-1	**Dibromochloromethane**	**See Table 3**
74-95-3	Dibromomethane (Methylene Bromide)	Use RSLs
95-50-1	1,2-Dichlorobenzene	Use RSLs
106-46-7	1,4-Dichlorobenzene	Use RSLs
75-71-8	Dichlorodifluoromethane	Use RSLs
75-34-3	**1,1-Dichloroethane**	**See Table 3**
107-06-2	1,2-Dichloroethane	Use RSLs
75-35-4	**1,1-Dichloroethylene (1,1-DCE)**	**See Table 3**
156-59-2	**cis-1,2-Dichloroethylene (cis-1,2-DCE)**	**See Table 3**
156-60-5	trans-1,2-Dichloroethylene (trans-1,2-DCE)	Use RSLs
78-87-5	1,2-Dichloropropane	Use RSLs
542-75-6	**1,3-Dichloropropene**	**See Table 3**
100-41-4	Ethylbenzene	Use RSLs
75-21-8	Ethylene oxide	Use RSLs
118-74-1	**Hexachlorobenzene**	**See Table 3**

Table 2. Page 2. Complete Listing of VOC U.S. EPA Air RSLs Reviewed to Date.

87-68-3	**Hexachlorobutadiene**	**See Table 3**
77-47-4	Hexachlorocyclopentadiene	Use RSLs
67-72-1	Hexachloroethane	Use RSLs
110-54-3	n-Hexane	Use RSLs
74-90-8	Hydrogen cyanide	Use RSLs
75-09-2	**Methylene Chloride**	**See Table 3**
78-93-3	Methyl ethyl ketone (2-butanone)	Use RSLs
108-10-1	Methyl Isobutyl Ketone (4-methyl-2-pentanone)	Use RSLs
91-57-6	**2-Methylnaphthalene**	**See Table 3**
1634-04-4	Methyl tert-Butyl Ether (MTBE)	Use RSLs
91-20-3	Naphthalene	Use RSLs
98-95-3	Nitrobenzene	Use RSLs
88-72-2	**o-Nitrotoluene**	**See Table 3**
103-65-1	Propyl benzene	Use RSLs
100-42-5	**Styrene**	**See Table 3**
630-20-6	**1,1,1,2-Tetrachloroethane**	**See Table 3**
79-34-5	**1,1,2,2-Tetrachloroethane**	**See Table 3**
127-18-4	**Tetrachloroethylene (PCE)**	**See Table 3**
108-88-3	**Toluene**	**See Table 3**
120-82-1	1,2,4-Trichlorobenzene	Use RSLs
71-55-6	**1,1,1-Trichloroethane**	**See Table 3**
79-00-5	1,1,2-Trichloroethane	Use RSLs
79-01-6	Trichloroethylene (TCE)	Use RSLs
75-69-4	Trichlorofluoromethane	Use RSLs
96-18-4	**1,2,3-Trichloropropane**	**See Table 3**
76-13-1	1,1,2-Trichloro-1,2,2-trifluoroethane	Use RSLs
95-63-6	1,2,4-Trimethylbenzene	Use RSLs
108-67-8	**1,3,5-Trimethylbenzene**	**See Table 3**
75-01-4	**Vinyl chloride**	**See Table 3**
95-47-6, 106-42-3, 1330-20-7, 108-38-3	Xylene(s), p-, m-, o-	Use RSLs

Table 3. Page 1. Alternate air screening levels currently recommended in lieu of the Spring 2013 RSLs.

				DTSC Recommended Values			
		More Protective of CalEPA and Nov 2012 U.S. EPA RSL Table Criteria		DTSC-Modified Residential Air Screening Level Calculated using RSL Calculator		DTSC-Modified Industrial Air Screening Level Calculated using RSL Calculator	
CAS No.	Volatile Organic Compound	IUR (per µg/m^3)	RfC or REL (mg/m^3)	Cancer (µg/m^3)	Noncancer (µg/m^3)	Cancer (µg/m^3)	Noncancer (µg/m^3)
75-07-0	**Acetaldehyde**	2.7E-06 (C)	0.009 (S)	**0.9**	Use RSL	**4.5**	Use RSL
107-13-1	**Acrylonitrile**	2.9E-04 (C)	0.002 (S)	**0.0084**	Use RSL	**0.042**	Use RSL
71-43-2	**Benzene**	2.9E-05 (C)	0.03 (S)	**0.084**	Use RSL	**0.42**	Use RSL
111-44-4	**Bis(2-chloroethyl)ether**	7.1E-04 (C)	-	**0.0034**	-	**0.017**	-
75-27-4	**Bromodichloromethane**	3.70E-05 (C)	0.07 (R)	Use RSL	**73**	Use RSL	**310**
75-25-2	**Bromoform**	1.10E-06	0.07 (R)	Use RSL	**73**	Use RSL	**310**
106-99-0	**1,3-Butadiene**	1.7E-04 (C)	0.002 (C*)	**0.014**	Use RSL	**0.072**	Use RSL
104-51-8	**n-Butylbenzene**	-	0.175 (R)	-	**180**	-	**770**
135-98-8	**sec-Butylbenzene**	-	0.4 (SUR)	-	**420**	-	**1800**
98-06-6	**tert-Butylbenzene**	-	0.4 (SUR)	-	**420**	-	**1800**
56-23-5	**Carbon tetrachloride**	4.2E-05 (C)	0.04 (C)	**0.058**	**42**	**0.29**	**180**
109-69-3	**1-Chlorobutane**	-	0.14 (R)	-	**150**	-	**610**
124-48-1	**Dibromochloromethane**	2.7E-05 (C)	0.07 (R)	Use RSL	**73**	Use RSL	**310**
75-34-3	**1,1-Dichloroethane**	1.6E-06 (C)	0.7 (R)	Use RSL	**730**	Use RSL	**3100**
75-35-4	**1,1-Dichloroethylene (1,1-DCE)**	-	0.07 (C)	-	**73**	-	**310**
156-59-2	**cis-1,2-Dichloroethylene (cis-1,2-DCE)**	-	0.007 (R)	-	**7.3**	-	**31**
542-75-6	**1,3-Dichloropropene**	1.6E-05 (C)	0.02	**0.15**	Use RSL	**0.77**	Use RSL
118-74-1	**Hexachlorobenzene**	5.1E-04 (C)	0.0028 (R)	**0.0048**	**2.9**	**0.024**	**12**
87-68-3	**Hexachlorobutadiene**	2.20E-05	0.0035 (R)	Use RSL	**3.7**	Use RSL	**15**
75-09-2	**Methylene Chloride**	1E-06 (C)	0.4 (C)	**0.96**	**420**	**12**	**1800**
91-57-6	**2-Methylnaphthalene**	-	0.014 (R)	-	**15**	-	**61**
88-72-2	**o-Nitrotoluene**	6.3E-5 (R)	0.00315 (R)	0.039	**3.3**	0.195	**14**
100-42-5	**Styrene**	-	0.9 (C)	-	**940**	-	**3900**
630-20-6	**1,1,1,2-Tetrachloroethane**	7.40E-06	0.11 (R)	Use RSL	**120**	Use RSL	**480**
79-34-5	**1,1,2,2-Tetrachloroethane**	5.8E-05 (C)	0.07 (R)	Use RSL	**73**	Use RSL	**310**
127-18-4	**Tetrachloroethylene (PCE)**	5.9E-06 (C)	0.035 (C)	**0.41**	**37**	**2.08**	**150**
108-88-3	**Toluene**	-	0.3 (C)	-	**310**	-	**1300**
71-55-6	**1,1,1-Trichloroethane**	-	1 (C)	-	**1040**	-	**4400**
96-18-4	**1,2,3-Trichloropropane**	8.6E-03 (R)	0.0003	**0.0001**	Use RSL	**0.0014**	Use RSL
108-67-8	**1,3,5-Trimethylbenzene**	-	0.035 (R)	-	**37**	-	**150**
75-01-4	**Vinyl chloride**	7.8E-05 (C)	0.1	**0.031***	Use RSL	**0.16**	Use RSL

Table 3. Page 2. Alternate air screening levels currently recommended in lieu of the Spring 2013 RSLs.

Key:

Unless noted otherwise, criteria listed in Table 3 above are from the May 2013 RSL tables; S = see footnote for CalEPA criteria which are less protective than the RSL table values listed in Table 3; C = CalEPA criterion; R = route-extrapolated value, see footnote for details; SUR = surrogate value, see footnote for details; * See explanation below

Age-dependent adjustment factors (ADAFs) for mutagens were used in On-line RSL Calculator to derive DTSC-Modified Air Screening Levels for methylene chloride and 1,2,3-trichloropropane which the RSL Table identifies as mutagens.

Footnotes:

Acetaldehyde - CalEPA REL 0.140 mg/m^3; less protective than RSL table value

Acrylonitrile - CalEPA REL 0.005 mg/m^3; less protective than RSL table value

Benzene - CalEPA REL 0.06 mg/m^3; less protective than RSL table value

Bromodichloromethane - RfC-equivalent based on route-extrapolated RfDo value from RSL table

Bromoform - RfC-equivalent based on route-extrapolated RfDo value from RSL table

1,3-Butadiene - CalEPA REL 0.02 mg/m^3 equal to RSL table value

n-Butylbenzene - RfC-equivalent based on route-extrapolated RfDo value from RSL table

sec-Butylbenzene – Appendix A of the 2012 USEPA PPRTV for sec-Butylbenzene recommends Isopropylbenzene (cumene) as surrogate for oral noncancer effects. Route-extrapolation of the cumene oral RfD, 0.1 mg/kg-day, is 0.35 mg/m^3. HERO selected the cumene RfC, 0.4 mg/m^3, based on inhalation exposure data, as the surrogate toxicity value for screening.

tert-Butylbenzene - Appendix A of the 2012 USEPA PPRTV for tert-Butylbenzene recommends Isopropylbenzene (cumene) as surrogate for oral noncancer effects. Route-extrapolation of the cumene oral RfD, 0.1 mg/kg-day, is 0.35 mg/m^3. HERO selected the cumene RfC, 0.4 mg/m^3, based on inhalation exposure data, as the surrogate toxicity value for screening.

Dibromochloromethane - RfC-equivalent based on route-extrapolated RfDo value from RSL table

1-Chlorobutane - RfC-equivalent based on route-extrapolated RfDo value from RSL table

1,1-Dichloroethane - RfC-equivalent based on route-extrapolated RfDo from RSL table

cis-1,2-Dichloroethylene - RfC-equivalent based on route-extrapolated RfDo value from RSL table

Hexachlorobenzene – RfC-equivalent based on route-extrapolated RfDo value from RSL table

Hexachlorobutadiene - RfC-equivalent based on route-extrapolated RfDo value from RSL table

2-Methylnaphthalene - RfC-equivalent based on route-extrapolated RfDo value from RSL table

o-Nitrotoluene – IUR is route-extrapolated oral cancer slope factor from RSL table; RfC-equivalent based on route-extrapolated RfDo value from RSL table

1,1,1,2-Tetrachloroethane - RfC-equivalent based on route-extrapolated RfDo value from RSL table

1,1,2,2-Tetrachloroethane - RfC-equivalent based on route-extrapolated RfDo value from RSL table

1,2,3-Trichloropropane - IUR is route-extrapolated oral cancer slope factor from RSL table

1,3,5-Trimethylbenzene - RfC-equivalent based on route-extrapolated RfDo value from RSL table

Vinyl Chloride – RSL Calculator not used; Instead, DTSC-modified screening levels calculated using Equation 4.8.2 from RSL User's Guide

Human Health Risk Assessment Note Number 3
Appendix A- Key Inputs used to Derive DTSC Screening Levels

Soil - Cadmium and Compounds

30 Year Adult Residential Scenario Risk-Based Screening Levels for Soil

* To allow for a 30-year adult residential scenario, the "composite worker" scenario was selected in the RSL calculator and the following exposure parameters were modified to reflect default adult residential assumptions: exposure duration 30 years, exposure frequency of 350 days/year, dermal adherence factor 0.07 mg/cm^2, exposure time 24 hours, and skin surface area 5700 cm^2/day.

Chemical	Inhalation Unit Risk (ug/m^3)$^{-1}$	Chronic RfD (mg/kg-day)	Chronic RfC (mg/m^3)	GIABS	ABS	Particulate Emission Factor (m^3/kg)	Inhalation SL TR=1.0E-6 (mg/kg)	Carcinogenic SL TR=1.0E-6 (mg/kg)	Ingestion SL HQ=1 (mg/kg)	Dermal SL HQ=1 (mg/kg)	Inhalation SL HQ=1 (mg/kg)	Noncarcinogenic SL HI=1 (mg/kg)	Screening Level (mg/kg)
Cadmium (Diet)	4.20E-03	6.30E-06	1.00E-05	1	0.001	1.36E+09	7.88E+02	7.88E+02	4.60E+00	1.15E+03	1.42E+04	4.58E+00	4.58E+00 nc

Industrial Scenario Risk-Based Screening Levels for Soil

Chemical	Inhalation Unit Risk (ug/m^3)$^{-1}$	Chronic RfD (mg/kg-day)	Chronic RfC (mg/m^3)	GIABS	ABS	Particulate Emission Factor (m^3/kg)	Inhalation SL TR=1.0E-6 (mg/kg)	Carcinogenic SL TR=1.0E-6 (mg/kg)	Ingestion SL HQ=1 (mg/kg)	Dermal SL HQ=1 (mg/kg)	Inhalation SL HQ=1 (mg/kg)	Noncarcinogenic SL HI=1 (mg/kg)	Screening Level (mg/kg)
Cadmium (Diet)	4.20E-03	6.30E-06	1.00E-05	1	0.001	1.36E+09	3.97E+03	3.97E+03	6.44E+00	5.65E+02	5.95E+04	6.37E+00	6.37E+00 nc

Human Health Risk Assessment Note Number 3
Appendix A- Key Inputs used to Derive DTSC Screening Levels

Soil - Beryllium and Compounds (Including Beryllium Oxide)

Residential Scenario Risk-Based Screening Levels for Soil

Chemical	Inhalation Unit Risk $(ug/m^3)^{-1}$	Chronic RfD (mg/kg-day)	Chronic RfC (mg/m^3)	GIABS	ABS	Particulate Emission Factor (m^3/kg)	Inhalation SL TR=1.0E-6 (mg/kg)	Carcinogenic SL TR=1.0E-6 (mg/kg)	Ingestion SL Child HQ=1 (mg/kg)	Dermal SL Child HQ=1 (mg/kg)	Inhalation SL Child HQ=1 (mg/kg)	Noncarcinogenic SL Child HI=1 (mg/kg)	Screening Level (mg/kg)
Beryllium and compounds	2.40E-03	2.00E-04	7.00E-06	1	0.01	1.36E+09	1.38E+03	1.38E+03	1.56E+01	5.39E+02	9.92E+03	1.52E+01	1.52E+01 nc

Industrial Scenario Risk-Based Screening Levels for Soil

Chemical	Inhalation Unit Risk $(ug/m^3)^{-1}$	Chronic RfD (mg/kg-day)	Chronic RfC (mg/m^3)	GIABS	ABS	Particulate Emission Factor (m^3/kg)	Inhalation SL TR=1.0E-6 (mg/kg)	Carcinogenic SL TR=1.0E-6 (mg/kg)	Ingestion SL HQ=1 (mg/kg)	Dermal SL HQ=1 (mg/kg)	Inhalation SL HQ=1 (mg/kg)	Noncarcinogenic SL HI=1 (mg/kg)	Screening Level (mg/kg)
Beryllium and compounds	2.40E-03	2.00E-04	7.00E-06	1	0.01	1.36E+09	6.95E+03	6.95E+03	2.04E+02	1.79E+03	4.17E+04	1.83E+02	1.83E+02 nc

Human Health Risk Assessment Note Number 3
Appendix A- Key Inputs used to Derive DTSC Screening Levels

Soil - Beryllium Sulfate

Residential Scenario Risk-Based Screening Levels for Soil

* See Beryllium and Compounds above for risk-based screening levels for soil based on noncancer effects

Chemical	Inhalation Unit Risk $(ug/m^3)^{-1}$	Particulate Emission Factor (m^3/kg)	Inhalation SL TR=1.0E-6 (mg/kg)	Carcinogenic SL TR=1.0E-6 (mg/kg)
Beryllium sulfate	8.60E-01	1.36E+09	3.85E+00	3.85E+00

Industrial Scenario Risk-Based Screening Levels for Soil

Chemical	Inhalation Unit Risk $(ug/m^3)^{-1}$	Particulate Emission Factor (m^3/kg)	Inhalation SL TR=1.0E-6 (mg/kg)	Carcinogenic SL TR=1.0E-6 (mg/kg)
Beryllium sulfate	8.60E-01	1.36E+09	1.94E+01	1.94E+01

Human Health Risk Assessment Note Number 3
Appendix A- Key Inputs used to Derive DTSC Screening Levels

Air – Residential

Chemical	CAS Number	Inhalation Unit Risk $(ug/m^3)^{-1}$	Chronic RfC (mg/m^3)	Carcinogenic SL TR=1.0E-6 (ug/m^3)	Noncarcinogenic SL HI=1 (ug/m^3)	Screening Level (ug/m^3)
Acetaldehyde	75-07-0	2.70E-06	9.00E-03	9.01E-01	9.39E+00	9.01E-01 ca*
Acrylonitrile	107-13-1	2.90E-04	2.00E-03	8.39E-03	2.09E+00	8.39E-03 ca
Benzene	71-43-2	2.90E-05	3.00E-02	8.39E-02	3.13E+01	8.39E-02 ca
Bis(2-chloroethyl)ether	111-44-4	7.10E-04	-	3.43E-03	-	3.43E-03 ca**
Bromodichloromethane	75-27-4	3.70E-05	7.00E-02	6.58E-02	7.30E+01	6.58E-02 ca
Bromoform	75-25-2	1.10E-06	7.00E-02	2.21E+00	7.30E+01	2.21E+00 ca*
Butadiene, 1,3-	106-99-0	1.70E-04	2.00E-03	1.43E-02	2.09E+00	1.43E-02 ca
Butylbenzene, n-	104-51-8	-	1.75E-01	-	1.83E+02	1.83E+02 nc
Butylbenzene, sec-	135-98-8	-	4.00E-01	-	4.17E+02	4.17E+02 nc
Butylbenzene, tert-	98-06-6	-	4.00E-01	-	4.17E+02	4.17E+02 nc
Carbon Tetrachloride	56-23-5	4.20E-05	4.00E-02	5.79E-02	4.17E+01	5.79E-02 ca
Chlorobutane, 1-	109-69-3	-	1.40E-01	-	1.46E+02	1.46E+02 nc
Dibromochloromethane	124-48-1	2.70E-05	7.00E-02	9.01E-02	7.30E+01	9.01E-02 ca
Dichloroethane, 1,1-	75-34-3	1.60E-06	7.00E-01	1.52E+00	7.30E+02	1.52E+00 ca
Dichloroethylene, 1,1-	75-35-4	-	7.00E-02	-	7.30E+01	7.30E+01 nc
Dichloroethylene, 1,2-cis-	156-59-2	-	7.00E-03	-	7.30E+00	7.30E+00 nc
Dichloropropene, 1,3-	542-75-6	1.60E-05	2.00E-02	1.52E-01	2.09E+01	1.52E-01 ca
Hexachlorobenzene	118-74-1	5.10E-04	2.80E-03	4.77E-03	2.92E+00	4.77E-03 ca**
Hexachlorobutadiene	87-68-3	2.20E-05	3.50E-03	1.11E-01	3.65E+00	1.11E-01 ca*
Methylene Chloride	75-09-2	1.00E-06	4.00E-01	6.91E-01	4.17E+02	6.91E-01 ca
Methylnaphthalene, 2-	91-57-6	-	1.40E-02	-	1.46E+01	1.46E+01 nc
Nitrotoluene, o-	88-72-2	6.30E-05	3.15E-03	3.86E-02	3.29E+00	3.86E-01 ca
Styrene	100-42-5	-	9.00E-01	-	9.39E+02	9.39E+02 nc
Tetrachloroethane, 1,1,1,2-	630-20-6	7.40E-06	1.10E-01	3.29E-01	1.15E+02	3.29E-01 ca
Tetrachloroethane, 1,1,2,2-	79-34-5	5.80E-05	7.00E-02	4.20E-02	7.30E+01	4.20E-02 ca
Tetrachloroethylene	127-18-4	5.90E-06	3.50E-02	4.12E-01	3.65E+01	4.12E-01 ca*
Toluene	108-88-3	-	3.00E-01	-	3.13E+02	3.13E+02 nc
Trichloroethane, 1,1,1-	71-55-6	-	1.00E+00	-	1.04E+03	1.04E+03 nc
Trichloropropane, 1,2,3-	96-18-4	8.60E-03	3.00E-04	1.112E-04	3.13E-01	1.112E-04 ca
Trimethylbenzene, 1,3,5-	108-67-8	-	3.50E-02	-	3.65E+01	3.65E+01 nc

Human Health Risk Assessment Note Number 3
Appendix A- Key Inputs used to Derive DTSC Screening Levels
Air – Industrial

Chemical	CAS Number	Inhalation Unit Risk $(ug/m^3)^{-1}$	Chronic RfC (mg/m^3)	Carcinogenic SL TR=1.0E-6 (ug/m^3)	Noncarcinogenic SL HI=1 (ug/m^3)	Screening Level (ug/m^3)
Acetaldehyde	75-07-0	2.70E-06	9.00E-03	4.54E+00	3.94E+01	4.54E+00 ca**
Acrylonitrile	107-13-1	2.90E-04	2.00E-03	4.23E-02	8.76E+00	4.23E-02 ca
Benzene	71-43-2	2.90E-05	3.00E-02	4.23E-01	1.31E+02	4.23E-01 ca
Bis(2-chloroethyl)ether	111-44-4	7.10E-04	-	1.73E-02	-	1.73E-02 ca**
Bromodichloromethane	75-27-4	3.70E-05	7.00E-02	3.31E-01	3.07E+02	3.31E-01 ca
Bromoform	75-25-2	1.10E-06	7.00E-02	1.11E+01	3.07E+02	1.11E+01 ca*
Butadiene, 1,3-	106-99-0	1.70E-04	2.00E-03	7.21E-02	8.76E+00	7.21E-02 ca
Butylbenzene, n-	104-51-8	-	1.75E-01	-	7.67E+02	7.67E+02 nc
Butylbenzene, sec-	135-98-8	-	4.00E-01	-	1.75E+03	1.75E+03 nc
Butylbenzene, tert-	98-06-6	-	4.00E-01	-	1.75E+03	1.75E+03 nc
Carbon Tetrachloride	56-23-5	4.20E-05	4.00E-02	2.92E-01	1.75E+02	2.92E-01 ca
Chlorobutane, 1-	109-69-3	-	1.40E-01	-	6.13E+02	6.13E+02 nc
Dibromochloromethane	124-48-1	2.70E-05	7.00E-02	4.54E-01	3.07E+02	4.54E-01 ca
Dichloroethane, 1,1-	75-34-3	1.60E-06	7.00E-01	7.67E+00	3.07E+03	7.67E+00 ca
Dichloroethylene, 1,1-	75-35-4	-	7.00E-02	-	3.07E+02	3.07E+02 nc
Dichloroethylene, 1,2-cis-	156-59-2	-	7.00E-03	-	3.07E+01	3.07E+01 nc
Dichloropropene, 1,3-	542-75-6	1.60E-05	2.00E-02	7.67E-01	8.76E+01	7.67E-01 ca
Hexachlorobenzene	118-74-1	5.10E-04	2.80E-03	2.40E-02	1.23E+01	2.40E-02 ca**
Hexachlorobutadiene	87-68-3	2.20E-05	3.50E-03	5.57E-01	1.53E+01	5.57E-01 ca*
Methylene Chloride	75-09-2	1.00E-06	4.00E-01	1.23E+01	1.75E+03	1.23E+01 ca
Methylnaphthalene, 2-	91-57-6	-	1.40E-02	-	6.13E+01	6.13E+01 nc
Nitrotoluene, o-	88-72-2	6.3E-05	3.15E-03	1.95E-01	1.38E+01	1.95E-01 ca
Styrene	100-42-5	-	9.00E-01	-	3.94E+03	3.94E+03 nc
Tetrachloroethane, 1,1,1,2-	630-20-6	7.40E-06	1.10E-01	1.66E+00	4.82E+02	1.66E+00 ca
Tetrachloroethane, 1,1,2,2-	79-34-5	5.80E-05	7.00E-02	2.11E-01	3.07E+02	2.11E-01 ca
Tetrachloroethylene	127-18-4	5.90E-06	3.50E-02	2.08E+00	1.53E+02	2.08E+00 ca*
Toluene	108-88-3	-	3.00E-01	-	1.31E+03	1.31E+03 nc
Trichloroethane, 1,1,1-	71-55-6	-	1.00E+00	-	4.38E+03	4.38E+03 nc
Trichloropropane, 1,2,3-	96-18-4	8.60E-03	3.00E-04	1.43E-03	1.31E+00	1.43E-03 ca
Trimethylbenzene, 1,3,5-	108-67-8	-	3.50E-02	-	1.53E+02	1.53E+02 nc
Vinyl Chloride	75-01-4	7.80E-05	1.00E-01	1.57E-01	4.38E+02	1.57E-01 ca

APPENDIX N

DTSC LETTER ON SITE CHARACTERIZATION AND HEALTH RISK ASSESSMENT

Department of Toxic Substances Control

Matthew Rodriquez
Secretary for
Environmental Protection

Barbara A. Lee, Director
9211 Oakdale Avenue
Chatsworth, California 91311

Edmund G. Brown Jr.
Governor

December 22, 2015

Mr. William Lamborn
City of Los Angeles
Department of City Planning
200 North Spring Street, Room 750
Los Angeles, CA 90012

REVIEW OF SITE CHARACHTERIZATION AND HEALTH RISK ASSESSMENT, PIMA ALAMEDA PROPERTIES, LOS ANGELES, CALIFORNIA. DOCKET NO. HSA VCA 15/16-028

Dear Mr. Lamborn:

The Department of Toxic Substances Control (DTSC) has reviewed the site characterization and health risk assessment for the Pima Alameda property site in Los Angeles. DTSC review concluded that the site is suitable for Industrial/Commercial use. Future development or rezoning of the property for other than Industrial/Commercial use will require additional analysis and risk evaluation by DTSC to determine the suitability of the site for such use.

Should you have any questions regarding this letter you may contact me at (818) 717-6538.

Sincerely,

Haissam Y. Salloum, P.E.
Senior Engineer
Brownfields and Environmental Restoration Program – Chatsworth Office

Cc: Mr. Patrick A Perry
Allen Matkins Leck Gamble Mallory & Natsis LLP
515 South Figueroa Street, 9th Floor
Los Angeles, CA 90071-3301

APPENDIX O

LOCAL HIRE AGREEMENT

CONSTRUCTION LOCAL HIRE AGREEMENT
1801 41st Street

I. PURPOSE

This document sets forth the responsibilities of CEG Construction, and Playa Vista Job Opportunities and Business Services (PVJOBS) related to the hiring of "Local Residents" in the construction of the MANUFACTURING, WAREHOUSING AND DISTRIBUTION CENTER to be located at 1801 E. 41st St. Los Angeles, California 90058 ("Project Site").

II. TERM OF THE AGREEMENT

The term of this Agreement shall commence at breaking ground on the project ("Commencement Date") and shall remain in effect until completion of construction activities.

III. DEFINITIONS

a) **Community Employment Area-** means the area, which includes all areas within three (3) miles of the Project Site(s). Priority will be given to qualified individuals that resident within one (1) mile of the Project Site (s).

b) **Compliance Coordinator** –Defined as an individual and/or firmed hired to ensure that this Agreement is being honored and to verify that the agreed percentage of inviduals hired for construction jobs actually reside within the agreed area. The compliance coordinator shall be independent party and mutually agreed upon by CEG Construction and PVJOBS.

c) L**ocal Resident-** Defined as (a) an individual whose primary place of residence is within the Community Employment Area (Tier One); (b) an individual whose primary place of residence is in a High Unemployment Census Tract within the City of Los Angeles (Tier Two).

d) A**t-Risk Individual-** means a Local Resident that has one of the following barriers to employment at time of program enrollment: lacks high school diploma or GED, history of substance abuse, household income below 50% of the median, homeless, welfare recipient, history of involvement with the justice system, chronically unemployed or single parent.

IV. Local Hiring Terms:

a) 20% Local Hire Goal – Assertive effort will be made such that 20% of all hours worked in construction at the site be performed by Local Residents (The Local Hire Goal). Preference will be given to Local Residents in the following order: (i) those living within one mile of the Project site; (ii) those living in the Community Employment Area; and (iii) all other City of Los Angeles residents who reside in a census tract with high unemployment rates. Contractor's core or pre-existing workers qualify toward the Local Hire Goal. Contractors may use their own methods to identify and hire workers who qualify for the Local Hire Goal.

Tier 1 Zip Codes- Zip codes within one mile of the project site

90058 90270 90255 90011 90021
90023

Tier 2 Zip Codes-Zip codes within three miles of the project site

90001 90002 90003 90037 90089
90007 90015 90014 90013 90071
90017 90033 90063 90022 90040
90201 90208

Tier 3 Zip Codes- Zip codes within the City where the rate of unemployment is in excess of 200% of the County of Los Angeles unemployment rate and/or where 40% or more of the households live below the Federal poverty threshold.

90001 90013 90026 90049 90731
90002 90014 90028 90057 90744
90003 90015 90031 90058 90748
90005 90016 90032 90059 90813
90006 90017 90033 90061 91325
90008 90019 90038 90071 91331
90010 90021 90043 90089 91343
90011 90023 90044 90095 91352
90012 90024 90045 90230 91402

b) **10% At-Risk Hire Goal** - Assertive effort will be made such that 10% of all hours worked in construction at the site be performed by At-Risk Individuals (The At-Risk Hire Goal). Hours completed under the 10% At-Risk Hire Goal also count toward the 20% Local Hire Goal. All At-Risk hires shall be referred by PVJOBS.

V. RESPONSIBILITIES OF CEG Construction

A. Compensation- CEG Construction shall pay PVJOBS an hourly service fee based on an hourly charge rate as listed below. In no event shall the compensation fees exceed $1,000.00 per month.
- Jobs Coordinator = $75hr
- Union Liaison = $75hr
- Executive Director = $100hr

C. Preferential Notification. Contractors will notify of job opportunities in advance using a Craft Request Form (sample attached)

D. Duration. The duration of this agreement will start at the start of construction, (ground braking) and conclude at project construction completion. .

E. Wage and Compensation. CEG Construction shall provide wage/compensation that is at least the minimum Livable Wage as established by the City of Los Angeles Ordinance No. 172336 for Local and At-Risk individuals.

F. Local and At-Risk Employment. CEG Construction and its subcontractors will be the sole decision maker in the hiring process. Fair consideration will be afforded referrals by PVJOBS for employment.

VI. RESPONSIBILITIES OF PVJOBS

A. PVJOBS will coordinate with Developers and General Contractor to develop specific project parameters coinciding with this agreement for Local and At-Risk hiring. PVJOBS will develop program procedures with approval from the Developer or General Contractor. PVJOBS will refer qualified individuals to contractors who have been screened for skill sets qualifications and meet the Local and/or At-risk hiring parameters.

PVJOBS proposes to provide these specific services. Note that items listed as *in-kind* are free services and are provided at no cost to this agreement.

Community Outreach

1) PVJOBS will create, design and market a specific program targeting local residents for construction opportunities at the project, including fliers that can be handed out to "walk-ins" demonstrating program entrance procedures.
2) Attend Job Fairs, community meetings, to outreach to the local community to market construction opportunities at the project. *(in-kind)*
3) Provide as-needed assistance to clients with supportive services, including direct client aid (union initiation fees, tools, clothing, etc.), skills training, child care, transportation, educational remediation, etc., as a prelude to employment. *(in-kind)*
4) Provide as-needed assistance to clients for entry into unions. *(in-kind)*
5) Continue to support clients and refer them to employment opportunities for 3000 hours at this project or at other PVJOBS projects to insure a good start in their career of choice. *(in-kind)*

Contractor Outreach

1) Design and produce program specific documentation for contractors working at the project to facilitate contractors' request for skilled workers on their projects and for reporting and tracking purposes.
2) Outreach to contractors/employers to explain the program. Attend pre-bid and post award meetings to explain processes and procedures. Regular site visits and meetings to develop personal relationships that will facilitate trust and process expediency.
3) Referrals to contractors of clients that meet the geographic project requirements, low income and local low income requirements and the specific skill set requirements (including union and non-union referrals) for interview or hire. *(in-kind)*
4) Coordinate with labor unions to expedite dispatch of selected employees (note: dispatch of selected clients is subject to labor unions dispatch rules, regulations and approval. PVJOBS cannot dispatch workers from the union halls) *(in-kind)*
5) Provide ongoing support for contractors' human resources issues related to clients hired under the program. *(in-kind)*

6) Provide financial incentives information to contractors who hire eligible clients under WOTC and OJT. Complete forms for contractors to facilitate incentive collection.
7) Assist in the coordination and collection of monthly reports indicating conformance of each contractor to the hiring goals.

Project General Support

1) Provide general support for the project at hearings and community meetings as requested.
2) Provide assistance in the development of the Community Outreach Plan as it relates to project area resident local hiring and local low income hiring as required by the LADPW.
3) Assume full administrative responsibilities for program implementation of local hire and local apprentice goals as defined by the LADPW.
4) Generate additional reports, as requested by Sinanian Development, Inc., containing any other program information collected.

VII. JOINT RESPONSIBILITIES OF THE PARTIES

A. The parties may mutually agree to modify the Program objectives or the Program plan from time to time as deemed necessary;
B. The parties shall maintain all personnel records in accordance with applicable laws.

VIII. STATUS OF CEG Construction AND PVJOBS

It is expressly understood and agreed that this Agreement is not intended to, shall not be construed to, and does not create the relationship of agent, servant, employee, partnership, joint venture or association between CEG Construction and PVJOBS but is rather a contractor agreement by and between independent contractors, these being CEG Construction and PVJOBS.

IX. INDEMNIFICATION

A. Each party hereby agrees to indemnify, hold harmless, and defend the other party and the other party's officers, directors, employees, independent contractors, agents and Program Participants and other representatives insofar as it may legally do so, from and against all liability, damages, costs (including reasonable attorneys' fees), expenses or payment of any sum or sums of money due to any person whomsoever on account of claims, suits, liens, garnishments, attachments, costs, costs of investigation and defense (collectively "Claims") in any way attributable to employment practices or conduct of participant discipline (including, but not limited to, any practices or conduct which are alleged to be in violation of any statute, common law, regulation, policy, or administrative interpretation concerning wage and hour practices, health and safety, workers' compensation, employment discrimination, payroll taxes, labor relations, wrongful discharge, tortuous conduct, breach of employment relationship, whether based on oral, written or implied contract including breach of any collective bargaining contract to which such party is bound or any other aspect of employment whatsoever) of the performance of this Agreement..

B. This Article VI shall survive the termination or expiration of this Agreement.

X. INSURANCE

Before commencement of work, PVJOBS shall show evidence of insurances as agreed upon by the General Contractor or Developer and PVJOBS.

XI. AFFIRMATIVE ACTION AND NON-DISCRIMINATION

The parties agree that all Program Participants receiving training pursuant to this Agreement shall be selected without discrimination on account of race, religious creed, sex, sexual orientation, color, national origin, ancestry, age, physical handicap or mental condition, marital or veteran's status.

XII. RECORD DISCLOSURE REQUIREMENT

Review of Compliance- CEG Construction and the PVJOBS will keep records of their compliance with this Agreement, and makes such records available to the each other upon written request.

XIII. MISCELLANEOUS

1. Written notice required under this Agreement shall be delivered personally, sent by facsimile, or sent by United States registered or certified mail, postage prepaid and return receipt requested, and addressed or delivered to the parties at the following addresses (or such other addresses as may hereafter be designated by a party by written notice thereof to the other party).

If delivered personally, or by facsimile (with written confirmation by registered or certified mail placed in the mail no later than the following day), such notice shall be effective upon delivery, and if mailed, as provided for above, such notice shall be effective three (3) days after it is placed in the mail.

2. Any waiver of any terms and conditions hereof must be in writing and signed by the parties hereto. A waiver of any of the terms and conditions hereof is not to be construed as a waiver of any other terms and conditions hereof.

IN WITNESS WHEREOF, the parties hereto have caused this Agreement to be executed by their respective duly authorized representatives as of the date signed below.

C.E.G. Construction

By: _____ DATE: 6/2/14
Trace Chalmers

PVJOBS

By: Ernest M. Roberts DATE: _____
Ernest Roberts, Executive Director

CONSTRUCTION LOCAL HIRE AGREEMENT
1800 E. Martin Luther King Blvd

I. PURPOSE

This document sets forth the responsibilities of CEG Construction, and Playa Vista Job Opportunities and Business Services (PVJOBS) related to the hiring of "Local Residents" in the construction of the MANUFACTURING, WAREHOUSING AND DISTRIBUTION CENTER to be located at 1800 E. Martin Luther King Blvd. Los Angeles, California 90058 ("Project Site").

II. TERM OF THE AGREEMENT

The term of this Agreement shall commence at breaking ground on the project ("Commencement Date") and shall remain in effect until completion of construction activities.

III. DEFINITIONS

a) **Community Employment Area-** means the area, which includes all areas within three (3) miles of the Project Site(s). Priority will be given to qualified individuals that resident within one (1) mile of the Project Site (s).

b) **Compliance Coordinator** –Defined as an individual and/or firmed hired to ensure that this Agreement is being honored and to verify that the agreed percentage of inviduals hired for construction jobs actually reside within the agreed area. The compliance coordinator shall be independent party and mutually agreed upon by CEG Construction and PVJOBS.

c) **Local Resident-** Defined as (a) an individual whose primary place of residence is within the Community Employment Area (Tier One); (b) an individual whose primary place of residence is in a High Unemployment Census Tract within the City of Los Angeles (Tier Two).

d) **At-Risk Individual-** means a Local Resident that has one of the following barriers to employment at time of program enrollment: lacks high school diploma or GED, history of substance abuse, household income below 50% of the median, homeless, welfare recipient, history of involvement with the justice system, chronically unemployed or single parent.

IV. Local Hiring Terms:

a) 20% Local Hire Goal – Assertive effort will be made such that 20% of all hours worked in construction at the site be performed by Local Residents (The Local Hire Goal). Preference will be given to Local Residents in the following order: (i) those living within one mile of the Project site; (ii) those living in the Community Employment Area; and (iii) all other City of Los Angeles residents who reside in a census tract with high unemployment rates. Contractor's core or pre-existing workers

qualify toward the Local Hire Goal. Contractors may use their own methods to identify and hire workers who qualify for the Local Hire Goal.

Tier 1 Zip Codes- Zip codes within one mile of the project site

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Tier 2 Zip Codes-Zip codes within three miles of the project site

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b) **10% At-Risk Hire Goal** - Assertive effort will be made such that 10% of all hours worked in construction at the site be performed by At-Risk Individuals (The At-Risk Hire Goal). Hours completed under the 10% At-Risk Hire Goal also count toward the 20% Local Hire Goal. All At-Risk hires shall be referred by PVJOBS.

V. RESPONSIBILITIES OF CEG Construction

A. Compensation- CEG Construction shall pay PVJOBS an hourly service fee based on an hourly charge rate as listed below. In no event shall the compensation fees exceed $1,000.00 per month.
- Jobs Coordinator = $75hr
- Union Liaison = $75hr
- Executive Director = $100hr

C. Preferential Notification. Contractors will notify of job opportunities in advance using a Craft Request Form (sample attached)

D. Duration. The duration of this agreement will start at the start of construction, (ground braking) and conclude at project construction completion. .

E. Wage and Compensation. CEG Construction shall provide wage/compensation that is at least the minimum Livable Wage as established by the City of Los Angeles Ordinance No. 172336 for Local and At-Risk individuals.

F. Local and At-Risk Employment. CEG Construction and its subcontractors will be the sole decision maker in the hiring process. Fair consideration will be afforded referrals by PVJOBS for employment.

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5) Continue to support clients and refer them to employment opportunities for 3000 hours at this project or at other PVJOBS projects to insure a good start in their career of choice. *(in-kind)*

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Project General Support

1) Provide general support for the project at hearings and community meetings as requested.
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4) Generate additional reports, as requested by Sinanian Development, Inc., containing any other program information collected.

VII. JOINT RESPONSIBILITIES OF THE PARTIES

A. The parties may mutually agree to modify the Program objectives or the Program plan from time to time as deemed necessary;
B. The parties shall maintain all personnel records in accordance with applicable laws.

VIII. STATUS OF CEG Construction AND PVJOBS

It is expressly understood and agreed that this Agreement is not intended to, shall not be construed to, and does not create the relationship of agent, servant, employee, partnership, joint venture or association between CEG Construction and PVJOBS but is rather a contractor agreement by and between independent contractors, these being CEG Construction and PVJOBS.

IX. INDEMNIFICATION

A. Each party hereby agrees to indemnify, hold harmless, and defend the other party and the other party's officers, directors, employees, independent contractors, agents and Program Participants and other representatives insofar as it may legally do so, from and against all liability, damages, costs (including reasonable attorneys' fees), expenses or payment of any sum or sums of money due to any person whomsoever on account of claims, suits, liens, garnishments, attachments, costs, costs of investigation and defense (collectively "Claims") in any way attributable to employment practices or conduct of participant discipline (including, but not limited to, any practices or conduct which are alleged to be in violation of any statute, common law, regulation, policy, or administrative interpretation concerning wage and hour practices, health and safety, workers' compensation, employment discrimination, payroll taxes, labor relations, wrongful discharge, tortuous conduct, breach of employment relationship, whether based on oral, written or implied contract including breach of any collective bargaining contract to which such party is bound or any other aspect of employment whatsoever) of the performance of this Agreement..

B. This Article VI shall survive the termination or expiration of this Agreement.

X. INSURANCE

Before commencement of work, PVJOBS shall show evidence of insurances as agreed upon by the General Contractor or Developer and PVJOBS.

XI. AFFIRMATIVE ACTION AND NON-DISCRIMINATION

The parties agree that all Program Participants receiving training pursuant to this Agreement shall be selected without discrimination on account of race, religious creed, sex, sexual orientation, color, national origin, ancestry, age, physical handicap or mental condition, marital or veteran's status.

XII. RECORD DISCLOSURE REQUIREMENT

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1. Written notice required under this Agreement shall be delivered personally, sent by facsimile, or sent by United States registered or certified mail, postage prepaid and return receipt requested, and addressed or delivered to the parties at the following addresses (or such other addresses as may hereafter be designated by a party by written notice thereof to the other party).

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2. Any waiver of any terms and conditions hereof must be in writing and signed by the parties hereto. A waiver of any of the terms and conditions hereof is not to be construed as a waiver of any other terms and conditions hereof.

IN WITNESS WHEREOF, the parties hereto have caused this Agreement to be executed by their respective duly authorized representatives as of the date signed below.

C.E.G. Construction

By: _____ DATE: 6/2/14
Trace Chalmers

PVJOBS

By: Ernest M. Roberts DATE: _____

Ernest Roberts, Executive Director

CONSTRUCTION LOCAL HIRE AGREEMENT
1701 E. 41st Street

I. PURPOSE

This document sets forth the responsibilities of CEG Construction, and Playa Vista Job Opportunities and Business Services (PVJOBS) related to the hiring of "Local Residents" in the construction of the MANUFACTURING, WAREHOUSING AND DISTRIBUTION CENTER to be located at 1701 E. 41st Street. Los Angeles, California 90058 ("Project Site").

II. TERM OF THE AGREEMENT

The term of this Agreement shall commence at breaking ground on the project ("Commencement Date") and shall remain in effect until completion of construction activities.

III. DEFINITIONS

a) **Community Employment Area-** means the area, which includes all areas within three (3) miles of the Project Site(s). Priority will be given to qualified individuals that resident within one (1) mile of the Project Site (s).

b) **Compliance Coordinator** –Defined as an individual and/or firmed hired to ensure that this Agreement is being honored and to verify that the agreed percentage of inviduals hired for construction jobs actually reside within the agreed area. The compliance coordinator shall be independent party and mutually agreed upon by CEG Construction and PVJOBS.

c) **Local Resident-** Defined as (a) an individual whose primary place of residence is within the Community Employment Area (Tier One); (b) an individual whose primary place of residence is in a High Unemployment Census Tract within the City of Los Angeles (Tier Two).

d) **At-Risk Individual-** means a Local Resident that has one of the following barriers to employment at time of program enrollment: lacks high school diploma or GED, history of substance abuse, household income below 50% of the median, homeless, welfare recipient, history of involvement with the justice system, chronically unemployed or single parent.

IV. Local Hiring Terms:

a) 20% Local Hire Goal – Assertive effort will be made such that 20% of all hours worked in construction at the site be performed by Local Residents (The Local Hire Goal). Preference will be given to Local Residents in the following order: (i) those living within one mile of the Project site; (ii) those living in the Community Employment Area; and (iii) all other City of Los Angeles residents who reside in a census tract with high unemployment rates. Contractor's core or pre-existing workers qualify toward the Local Hire Goal. Contractors may use their own methods to identify and hire workers who qualify for the Local Hire Goal.

Tier 1 Zip Codes- Zip codes within one mile of the project site

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V. RESPONSIBILITIES OF CEG Construction

A. Compensation- CEG Construction shall pay PVJOBS an hourly service fee based on an hourly charge rate as listed below. In no event shall the compensation fees exceed $1,000.00 per month.
- Jobs Coordinator = $75hr
- Union Liaison = $75hr
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C. Preferential Notification. Contractors will notify of job opportunities in advance using a Craft Request Form (sample attached)

D. Duration. The duration of this agreement will start at the start of construction, (ground braking) and conclude at project construction completion. .

E. Wage and Compensation. CEG Construction shall provide wage/compensation that is at least the minimum Livable Wage as established by the City of Los Angeles Ordinance No. 172336 for Local and At-Risk individuals.

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IN WITNESS WHEREOF, the parties hereto have caused this Agreement to be executed by their respective duly authorized representatives as of the date signed below.

C.E.G. Construction

By: _____ DATE: 7/9/13
Trace Chalmers

PVJOBS

By: Ernest M. Roberts DATE: _____
Ernest Roberts, Executive Director

CONSTRUCTION LOCAL HIRE AGREEMENT
1700 E. Martin Luther King Blvd.

I. PURPOSE

This document sets forth the responsibilities of CEG Construction, and Playa Vista Job Opportunities and Business Services (PVJOBS) related to the hiring of "Local Residents" in the construction of the MANUFACTURING, WAREHOUSING AND DISTRIBUTION CENTER to be located at 1700 E. Martin Luther King Blvd. Los Angeles, California 90058 ("Project Site").

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- Executive Director = $100hr

C. Preferential Notification. Contractors will notify of job opportunities in advance using a Craft Request Form (sample attached)

D. Duration. The duration of this agreement will start at the start of construction, (ground braking) and conclude at project construction completion. .

E. Wage and Compensation. CEG Construction shall provide wage/compensation that is at least the minimum Livable Wage as established by the City of Los Angeles Ordinance No. 172336 for Local and At-Risk individuals.

F. Local and At-Risk Employment. CEG Construction and its subcontractors will be the sole decision maker in the hiring process. Fair consideration will be afforded referrals by PVJOBS for employment.

VI. RESPONSIBILITIES OF PVJOBS

A. PVJOBS will coordinate with Developers and General Contractor to develop specific project parameters coinciding with this agreement for Local and At-Risk hiring. PVJOBS will develop program procedures with approval from the Developer or General Contractor. PVJOBS will refer qualified individuals to contractors who have been screened for skill sets qualifications and meet the Local and/or At-risk hiring parameters.

PVJOBS proposes to provide these specific services. Note that items listed as *in-kind* are free services and are provided at no cost to this agreement.

Community Outreach

1) PVJOBS will create, design and market a specific program targeting local residents for construction opportunities at the project, including fliers that can be handed out to "walk-ins" demonstrating program entrance procedures.
2) Attend Job Fairs, community meetings, to outreach to the local community to market construction opportunities at the project. *(in-kind)*
3) Provide as-needed assistance to clients with supportive services, including direct client aid (union initiation fees, tools, clothing, etc.), skills training, child care, transportation, educational remediation, etc., as a prelude to employment. *(in-kind)*
4) Provide as-needed assistance to clients for entry into unions. *(in-kind)*
5) Continue to support clients and refer them to employment opportunities for 3000 hours at this project or at other PVJOBS projects to insure a good start in their career of choice. *(in-kind)*

Contractor Outreach

1) Design and produce program specific documentation for contractors working at the project to facilitate contractors' request for skilled workers on their projects and for reporting and tracking purposes.
2) Outreach to contractors/employers to explain the program. Attend pre-bid and post award meetings to explain processes and procedures. Regular site visits and meetings to develop personal relationships that will facilitate trust and process expediency.
3) Referrals to contractors of clients that meet the geographic project requirements, low income and local low income requirements and the specific skill set requirements (including union and non-union referrals) for interview or hire. *(in-kind)*
4) Coordinate with labor unions to expedite dispatch of selected employees (note: dispatch of selected clients is subject to labor unions dispatch rules, regulations and approval. PVJOBS cannot dispatch workers from the union halls) *(in-kind)*

5) Provide ongoing support for contractors' human resources issues related to clients hired under the program. *(in-kind)*
6) Provide financial incentives information to contractors who hire eligible clients under WOTC and OJT. Complete forms for contractors to facilitate incentive collection.
7) Assist in the coordination and collection of monthly reports indicating conformance of each contractor to the hiring goals.

Project General Support

1) Provide general support for the project at hearings and community meetings as requested.
2) Provide assistance in the development of the Community Outreach Plan as it relates to project area resident local hiring and local low income hiring as required by the LADPW.
3) Assume full administrative responsibilities for program implementation of local hire and local apprentice goals as defined by the LADPW.
4) Generate additional reports, as requested by Sinanian Development, Inc., containing any other program information collected.

VII. JOINT RESPONSIBILITIES OF THE PARTIES

A. The parties may mutually agree to modify the Program objectives or the Program plan from time to time as deemed necessary;
B. The parties shall maintain all personnel records in accordance with applicable laws.

VIII. STATUS OF CEG Construction AND PVJOBS

It is expressly understood and agreed that this Agreement is not intended to, shall not be construed to, and does not create the relationship of agent, servant, employee, partnership, joint venture or association between CEG Construction and PVJOBS but is rather a contractor agreement by and between independent contractors, these being CEG Construction and PVJOBS.

IX. INDEMNIFICATION

A. Each party hereby agrees to indemnify, hold harmless, and defend the other party and the other party's officers, directors, employees, independent contractors, agents and Program Participants and other representatives insofar as it may legally do so, from and against all liability, damages, costs (including reasonable attorneys' fees), expenses or payment of any sum or sums of money due to any person whomsoever on account of claims, suits, liens, garnishments, attachments, costs, costs of investigation and defense (collectively "Claims") in any way attributable to employment practices or conduct of participant discipline (including, but not limited to, any practices or conduct which are alleged to be in violation of any statute, common law, regulation, policy, or administrative interpretation concerning wage and hour practices, health and safety, workers' compensation, employment discrimination, payroll taxes, labor relations, wrongful discharge, tortuous conduct, breach of employment relationship, whether based on oral, written or implied contract including breach of any collective bargaining contract to which such party is bound or any other aspect of employment whatsoever) of the performance of this Agreement..

B. This Article VI shall survive the termination or expiration of this Agreement.

X. INSURANCE

Before commencement of work, PVJOBS shall show evidence of insurances as agreed upon by the General Contractor or Developer and PVJOBS.

XI. AFFIRMATIVE ACTION AND NON-DISCRIMINATION

The parties agree that all Program Participants receiving training pursuant to this Agreement shall be selected without discrimination on account of race, religious creed, sex, sexual orientation, color, national origin, ancestry, age, physical handicap or mental condition, marital or veteran's status.

XII. RECORD DISCLOSURE REQUIREMENT

Review of Compliance- CEG Construction and the PVJOBS will keep records of their compliance with this Agreement, and makes such records available to the each other upon written request.

XIII. MISCELLANEOUS

1. Written notice required under this Agreement shall be delivered personally, sent by facsimile, or sent by United States registered or certified mail, postage prepaid and return receipt requested, and addressed or delivered to the parties at the following addresses (or such other addresses as may hereafter be designated by a party by written notice thereof to the other party).

If delivered personally, or by facsimile (with written confirmation by registered or certified mail placed in the mail no later than the following day), such notice shall be effective upon delivery, and if mailed, as provided for above, such notice shall be effective three (3) days after it is placed in the mail.

2. Any waiver of any terms and conditions hereof must be in writing and signed by the parties hereto. A waiver of any of the terms and conditions hereof is not to be construed as a waiver of any other terms and conditions hereof.

IN WITNESS WHEREOF, the parties hereto have caused this Agreement to be executed by their respective duly authorized representatives as of the date signed below.

C.E.G. Construction

By: _____ DATE: 7/9/13
Trace Chalmers

PVJOBS

By: Ernest M. Roberts

Ernest Roberts, Executive Director

DATE: _____

LOCAL HIRE AGREEMENT

BETWEEN

Poetry, Impact, Miss Me, Active Companies,

And

Coalition for Responsible Community Development and Los Angeles Job Corps

This Agreement is entered into between Poetry, Impact, Miss Me, Active Companies (herein known as PIMA) and Coalition for Responsible Community Development and Los Angeles Job Corps.(herein known, collectively, as Local Community Based Partners).

PURPOSE

This document sets forth the responsibilities of PIMA and Local Community Based Partners related to the hiring of "Local Residents" for the MANUFACTURING, WAREHOUSING AND DISTRIBUTION CENTER (the "Project") to be located at or near the intersection of 41st Place and Alameda Street, Los Angeles, California 90058 ("Project Site").

DEFINITIONS

Community Employment Area- means the area, which includes all areas within three (3) miles of the Project Site(s). Priority will be given to qualified individuals that reside within one (1) mile of the Project Site(s).

Employment Training Center- A designated site near the Project Site coordinated by Community Based Partners where local residents can receive training specific to jobs that will be created at the Project Site, collection location for applications as jobs become available, and site to coordinate community information events pertaining to the site.

Compliance Coordinator –Defined as an individual and/or firms hired to ensure that this Agreement is being honored and to verify that the agreed percentage of inviduals hired for construction and permanent jobs actually reside within the agreed area. The Compliance Coordinator shall be independent party and mutually agreed upon by PIMA and the Local Community Based Partners.

Jobs Coordinator – Defined as an individual and/or firms hired to recruit individuals from the agreed target area, screen individuals for qualifications and certifications, and work with the site foreman to ensure individuals are performing at the level expected by the contractor.

Local Resident- Defined as (a) an individual whose primary place of residence is within the Community Employment Area; (b) any At-Risk Individual whose primary place of residence is within the Community Employment Area; or (c) an individual whose primary place of residence is in a high unemployment census tract within the City of Los Angeles.

At-Risk Individual- means a lower income individual that has one of the following barriers to employment: is homeless; has a criminal record, lack of English language and literacy skills; is a single parent or a welfare recipient; or has significant gaps in work history.

Local Hiring Terms:

Local Hiring Goal – Assertive effort will be made to hire Local Residents for new employment positions and/or employment positions that become vacant during the term of this Agreement for which such Local Residents are qualified.

Preference will be given to Local Residents in the following order: (i) those living within one mile of the Project Site; (ii) those living in the Community Employment Area; and (iii) all other City of Los Angeles residents who reside in a census tract with high unemployment rates.

PIMA agrees to use commercially reasonable efforts to locally hire and will measure this by amount of hours worked. The Compliance Coordinator will request and review payroll records on a quarterly basis to ensure compliance.

PIMA agrees to make use commercially reasonable efforts to locally hire at least 50% of its workforce from high unemployment zip codes that include:

Tier 1 Zip Codes- Zip codes within one mile of the Project Site

90058 90270 90255 90011 90021
90023

Tier 2 Zip Codes-Zip codes within three miles of the Project Site

90001 90002 90003 90037 90089
90007 90015 90014 90013 90071
90017 90033 90063 90022 90040
90201 90208

Tier 3 Zip Codes- Zip codes within the City where the rate of unemployment is in excess of 200% of the County of Los Angeles unemployment rate and/or where 40% or more of the households live below the Federal poverty threshold.

90001 90013 90026 90049 90731
90002 90014 90028 90057 90744
90003 90015 90031 90058 90748
90005 90016 90032 90059 90813
90006 90017 90033 90061 91325
90008 90019 90038 90071 91331
90010 90021 90043 90089 91343
90011 90023 90044 90095 91352
90012 90024 90045 90230 91402

RECITALS

NOW THEREFORE, for good and valuable consideration, the receipt and sufficiency are hereby acknowledged, the parties agree as follows:

I. TERM OF THE AGREEMENT

The term of this Agreement shall commence on the date the Certificate of Occupancy is issued with respect to the entire Project ("Commencement Date") and shall remain in effect for a period of five (5) years thereafter; provided, that, if any member of PIMA ceases operations at the Project Site, for each such instance, such member shall be relieved of its obligations.

II. RESPONSIBILITIES OF PIMA

A. PIMA may provide basic training materials or information that can be incorporated into the Employee Training Center to better prepare job seekers for the Project.

B. Compensation- PIMA shall pay the Local Community Based Partners a one-time service retention fee of $250,000.00 for the duration of this Agreement. PIMA shall not be responsible for any other fees or reimbursements hereunder.

C. Preferential Notification. PIMA will notify of job opportunities in advance of other hiring outreach efforts and provide a description of job responsibilities and qualifications, including expectations, salary, work schedule, duration of employment, and any special requirements (e.g., language skills, drivers' licenses, etc.).

D. Duration. Reasonable effort will be made to provide preferential notification not less than a three (3) week period prior to commencement of operations at Project Site. After commencement of operations at the Project Site, reasonable effort will be made to provide preferential notification at least five business (5) days prior to the announcement of any job opportunity. Such preferential notification will take place throughout the period described below.

E. Hiring Preferences. Subject to compliance with the preferential notification procedures referred to above, PIMA will consider applicants referred or recruited through the local hire contractor, and may use normal hiring practices, including interviews, to consider all referred applicants as positions become available.

F. Exclusive Initial Hiring. When making initial hires for the commencement of operations at the Project Site, PIMA will make every effort to fill as many vacant employment positions with Local Residents.

G. Wage and Compensation. Reference is made to attached position and pay scale chart. PIMA shall provide wage/compensation that is at least the Minimum Wage as established by the State of California for qualified individuals. PIMA will make every attempt to create pay scale similar to existing staff format.

H. Notwithstanding anything to the contrary herein, the ultimate decision to hire, fire or lay off any employees or otherwise to make any decisions regarding any employees shall be at the sole discretion of PIMA.

III. RESPONSIBILITIES OF THE COMMUNITY BASED PARTNERS, JOB COORDINATOR

A. Community Based Partners shall designate a Jobs Coordinator who will:

- Set up an agreed upon account at a financial institution to restrict funds associated with the Project;
- Use best efforts to only provide employee candidates who are able to work AT LEAST 2080 hours per year;
- Coordinate marketing/outreach activities with WorkSource Centers and community-based organizations to identify Local Community Based Partners' jobseekers;
- Conduct initial assessment of all potential employees for suitability;
- Provide employment readiness training and certification for all potential employees;
- Provide soft skills training;
- Customize training programs to prepare jobseekers for employment, integrating employer-provided curriculum when available, or broker employer-driven programs through the Employee Training Center;
- Provide English as a second language training for English language deficient job seekers;
- Provide skills certification for individuals who successfully complete programs. These programs include forklift operator, OSHA 10, finance and accounting, and customer service;
- Provide an on-site venue for Local Community Based Partners for public hiring events/job fairs;
- Provide post-hire support services to students, designed to mitigate early drop-out. These services include job retention counseling, housing, transportation, tools, clothing, and meal vouchers after initial placement;
- Provide any other services as may be agreed upon between PIMA, and the Community Based Partners to better serve Program Participants and the general community.

B. Community Based Partners shall comply with all applicable laws and shall perform its duties hereunder with diligence and with first-class standards.

IV. JOINT RESPONSIBILITIES OF THE PARTIES

A. The parties may mutually agree to modify the objectives of the foregoing program (described in Article III above) or the program plan from time to time as deemed necessary;

B. The parties shall maintain all personnel records in accordance with applicable laws.

V. STATUS

It is expressly understood and agreed that this Agreement is not intended to, shall not be construed to, and does not create the relationship of agent, servant, employee, partnership, joint venture or association between PIMA and Community Based Partners but is rather a contractor agreement by and between independent contractors, these being PIMA and Community Based Partners.

VI INDEMNIFICATION

A. Each party hereby agrees to indemnify, hold harmless, and defend the other party and the other party's officers, directors, employees, independent contractors, agents and program participants and other representatives insofar as it may legally do so, from and against all liability, damages, costs (including reasonable attorneys' fees), expenses or payment of any sum or sums of money due to any person whomsoever on account of claims, suits, liens, garnishments, attachments, costs, costs of investigation and defense (collectively "Claims") in any way attributable to such indemnifying party's breach of this Agreement or such indemnifying party's gross negligence or intentional misconduct...

B. This Article VI shall survive the termination or expiration of this Agreement.

VII INSURANCE

Community Based Partners shall provide General Liability Insurance to participants of the training program.

VIII AFFIRMATIVE ACTION AND NON-DISCRIMINATION

The parties agree that all program participants receiving training pursuant to this Agreement shall be selected without discrimination on account of race, religious creed, sex, sexual orientation, color, national origin, ancestry, age, physical handicap or mental condition, marital or veteran's status.

IX RECORD DISCLOSURE REQUIREMENT

Review of Compliance- PIMA, and the Community Based Partners will keep records of their compliance with this Agreement, and makes such records available to the other upon written

request. Community Based Partners will provide annual reports in their newsletters regarding compliance with this Agreement.

X MISCELLANEOUS

1. Written notice required under this Agreement shall be delivered personally, sent by facsimile, or sent by United States registered or certified mail, postage prepaid and return receipt requested, and addressed or delivered to the parties at the following addresses (or such other addresses as may hereafter be designated by a party by written notice thereof to the other party).

[*notice addresses to be added*]

If delivered personally, or by facsimile (with written confirmation by registered or certified mail placed in the mail no later than the following day), such notice shall be effective upon delivery, and if mailed, as provided for above, such notice shall be effective three (3) days after it is placed in the mail.

2. Any waiver of any terms and conditions hereof must be in writing and signed by the parties hereto. A waiver of any of the terms and conditions hereof is not to be construed as a waiver of any other terms and conditions hereof.

3. This Agreement is the entire agreement between the parties with respect to the subject matter hereof, and no alteration, modification or interpretation hereof shall be binding unless in writing and signed by both parties.

4. Should either party commence any action against the other to enforce any obligation hereunder, the prevailing party shall be entitled to recover from the other its costs and reasonable attorneys' fees.

5. PIMA's liability hereunder is limited to its interest in the Project. No real, personal, or mixed property of PIMA wherever situated other than the Project shall be subject to levy or attachment on any judgment obtained against PIMA arising here from or with respect hereto.

IN WITNESS WHEREOF. the parties hereto have caused this Agreement to be executed by their respective duly authorized representatives as of the date first written above.

Managing Partner, Poetry

By: _____ DATE: 6/25/13
Poetry, Managing Partner

Managing Partner, Impact

By: _____ DATE: 6/25/13
Impact, Managing Partner

Managing Partner, Miss Me

By: _____ DATE: 6/25/13
Miss Me, Managing Partner

Managing Partner, Active

By: _____ DATE: 6/25/2013
Active,, Managing Partner

Coalition for Responsible Community Development

By: _____ DATE: 6/26/2013
The Community Based Partners

Los Angeles Job Corps

By: _____ DATE: _____
The Community Based Partners

It was suggested at the meeting that a form be developed that can be used tc refer potential employees to PIMA and be added as an addendum.

ACTIVE USA INC

Job Classifications	# of Employee	Average Hourly Rate	40 Hrs. Wage	Monthly Rate for Classification	Total Annual Wage Paid per Classification
ACCOUNTING	5	$ 28.00	$ 1,120.00	$ 4,849.60	$ 290,976.00
CASHIERS	2	$ 15.00	$ 600.00	$ 2,598.00	$ 62,352.00
DESIGN	3	$ 30.00	$ 1,200.00	$ 5,196.00	$ 187,056.00
DRIVER	3	$ 18.00	$ 720.00	$ 3,117.60	$ 112,233.60
GRAPHIC & PHOTO	2	$ 22.00	$ 880.00	$ 3,810.40	$ 91,449.60
INTERNET SALES	2	$ 18.00	$ 720.00	$ 3,117.60	$ 74,822.40
INTERNS	4	$ 9.00	$ 360.00	$ 1,558.80	$ 74,822.40
OFFICERS	2	$ 60.00	$ 2,400.00	$ 10,392.00	$ 249,408.00
PATTERN & SAMPLE	2	$ 32.00	$ 1,280.00	$ 5,542.40	$ 133,017.60
PRODUCTION	5	$ 25.00	$ 1,000.00	$ 4,330.00	$ 259,800.00
SALES	3	$ 35.00	$ 1,400.00	$ 6,062.00	$ 218,232.00
SHIPPING/RECEIVING	5	$ 18.00	$ 720.00	$ 3,117.60	$ 187,056.00
STOCKMAN	26	$ 10.00	$ 400.00	$ 1,732.00	$ 540,384.00
TOTAL	64				2,481,609.60

Poetry

Job Classifications	# of Employee	Hourly Rate	40 Hrs. Wage	Monthly Rate for Classification	Total Annual Wage Paid per Classification
Accountant	1	$ 43.50	$ 1,740.00	$ 7,540.00	$ 90,480.00
Accounting Clerk	1	$ 14.00	$ 560.00	$ 2,426.67	$ 29,120.00
Accounting Clerk	1	$ 18.00	$ 720.00	$ 3,120.00	$ 37,440.00
CEO	1	$ 134.62	$ 5,384.80	$ 23,334.13	$ 280,009.60
Clerk	1	$ 10.00	$ 400.00	$ 1,733.33	$ 20,800.00
Clerk	1	$ 22.50	$ 900.00	$ 3,900.00	$ 46,800.00
Designer	1	$ 120.19	$ 4,807.60	$ 20,832.93	$ 249,995.20
Designer's Assistant	1	$ 10.00	$ 400.00	$ 1,733.33	$ 20,800.00
Designer's Assistant	1	$ 13.00	$ 520.00	$ 2,253.33	$ 27,040.00
Driver	1	$ 14.25	$ 570.00	$ 2,470.00	$ 29,640.00
Import Coordinator	1	$ 8.00	$ 320.00	$ 1,386.67	$ 16,640.00
Import Coordinator	1	$ 12.00	$ 480.00	$ 2,080.00	$ 24,960.00
Import Coordinator	1	$ 13.00	$ 520.00	$ 2,253.33	$ 27,040.00
Import Coordinator	2	$ 21.00	$ 840.00	$ 3,640.00	$ 43,680.00
Marking/Grading	1	$ 23.44	$ 937.60	$ 4,062.93	$ 48,755.20
Pattern Maker	1	$ 50.68	$ 2,027.20	$ 8,784.53	$ 105,414.40
President	1	$ 120.19	$ 4,807.60	$ 20,832.93	$ 249,995.20
Production Helper	2	$ 8.50	$ 340.00	$ 2,946.67	$ 70,720.00
Production Manager	1	$ 40.00	$ 1,600.00	$ 6,933.33	$ 83,200.00
Receiving/Packing/Shipping	1	$ 8.00	$ 320.00	$ 1,386.67	$ 16,640.00
Receiving/Packing/Shipping	1	$ 8.25	$ 330.00	$ 1,430.00	$ 17,160.00
Receiving/Packing/Shipping	1	$ 8.75	$ 350.00	$ 1,516.67	$ 18,200.00
Receiving/Packing/Shipping	1	$ 9.00	$ 360.00	$ 1,560.00	$ 18,720.00
Receiving/Packing/Shipping	1	$ 9.25	$ 370.00	$ 1,603.33	$ 19,240.00
Receiving/Packing/Shipping	1	$ 9.50	$ 380.00	$ 1,646.67	$ 19,760.00
Receiving/Packing/Shipping	2	$ 10.00	$ 400.00	$ 1,733.33	$ 41,600.00
Receiving/Packing/Shipping	1	$ 10.25	$ 410.00	$ 1,776.67	$ 21,320.00
Receiving/Packing/Shipping	2	$ 10.50	$ 420.00	$ 1,820.00	$ 43,680.00
Receiving/Packing/Shipping	1	$ 10.75	$ 430.00	$ 1,863.33	$ 22,360.00
Receiving/Packing/Shipping	1	$ 11.75	$ 470.00	$ 2,036.67	$ 24,440.00
Receiving/Packing/Shipping	1	$ 14.12	$ 564.80	$ 2,447.47	$ 29,369.60
Receptionist	1	$ 8.25	$ 330.00	$ 1,430.00	$ 17,160.00
Sales	1	$ 18.90	$ 756.00	$ 3,276.00	$ 39,312.00
Sales	1	$ 19.40	$ 776.00	$ 3,362.67	$ 40,352.00
Sample Maker	2	$ 18.25	$ 730.00	$ 3,163.33	$ 37,960.00
Shipping Manager	1	$ 13.00	$ 520.00	$ 2,253.33	$ 27,040.00
Store Manager	1	$ 66.00	$ 2,640.00	$ 11,440.00	$ 137,280.00
TOTAL	40.00				$ 2,094,123.20

IMPACT MANUFACTURING CORP.

Job Classifications	# of Employee	Average Hourly Rate	40 Hrs. Wage	Monthly Rate for Classification	Total Annual Wage Paid for Classification
ACCOUNT	2	$ 25.00	$ 1,000.00	$ 4,330.00	$ 103,920.00
CLERK	2	$ 10.50	$ 420.00	$ 1,818.60	$ 43,646.40
COO	2	$ 50.00	$ 2,000.00	$ 8,660.00	$ 207,840.00
CUTTER	20	$ 10.00	$ 400.00	$ 1,732.00	$ 415,680.00
INSPECTOR	90	$ 8.25	$ 330.00	$ 1,428.90	$ 1,543,212.00
PATTERN	2	$ 35.00	$ 1,400.00	$ 6,062.00	$ 145,488.00
PRODUCER	10	$ 12.00	$ 480.00	$ 2,078.40	$ 249,408.00
SEWER	150	$ 8.75	$ 350.00	$ 1,515.50	$ 2,727,900.00
SHIPPING/RECEIVING	10	$ 9.00	$ 360.00	$ 1,558.80	$ 187,056.00
TOTAL	288				5,455,296.00

Miss Me

Job Classifications	# of Emp.	Average Hourly Rate	40 Hrs. Wage	Monthly Rate for Classification	Total Annual Wage Paid for Classification
Accounting	9	22.11	884.40	3,829.45	413,580.82
CFO/COO	2	136.23	5,449.20	23,595.04	566,280.86
Customer Service/Sales	42	19.52	780.80	3,380.86	1,703,955.46
Designer	29	28.58	1,143.20	4,950.06	1,722,619.49
IT	2	36.66	1,466.40	6,349.51	152,388.29
Janitorial/Security Guardian	4	12.54	501.60	2,171.93	104,252.54
Legal/HR	6	29.3	1,172.00	5,074.76	365,382.72
PR/Marketing	8	16.06	642.40	2,781.59	267,032.83
Production Coordinator	19	14.06	562.40	2,435.19	555,223.78
Shipping/Receiving	84	8.5	340.00	1,472.20	1,483,977.60
Total	205				7,334,694.38

Grand Total	597.00				$ 17,365,723.18

Insert Company Name

Name	Hourly Rate	Monthly Wage	Job Classifications
			Receiving/Packing/Shipping
			Assistant
			Clerk
			Clerk
			Receiving/Packing/Shipping
			Receiving/Packing/Shipping
			Clerk
			Assistant
			Clerk
			Assistant
			Receiving/Packing/Shipping
			Receiving/Packing/Shipping
			Receiving/Packing/Shipping
			Receptionist
			Receiving/Packing/Shipping
			Receiving/Packing/Shipping
			Receiving/Packing/Shipping
			Clerk
			Receiving/Packing/Shipping
			Receiving/Packing/Shipping
			Receiving/Packing/Shipping
			Receiving/Packing/Shipping
			Import Coordinator
			Receiving/Packing/Shipping
			Receiving/Packing/Shipping
			Driver
			Import Coordinator
			Clerk
			Driver
			Sales
			Accountant
			Sample Maker
			Sales
			Shipping Manager
			Import Coordinator
			Clerk
			Clerk
			Pattern Maker
			Production Manager
			Accountant
			Store Manager
			President
			Designer
			CFO

TOTAL	0.00	0.00
# of Employee	-	
Avg Rate	#DIV/0!	#DIV/0!

Avg Wage per Week	#DIV/0!
Avg Wage per Month	#DIV/0!
Avg Wage per Year	#DIV/0!

APPENDIX P

CITY BUREAU OF SANITATION LETTER, JANUARY 14, 2016

FORM GEN. 160 (Rev. 8-12)

CITY OF LOS ANGELES
INTER-DEPARTMENTAL CORRESPONDENCE

DATE: January 14, 2016

TO: Srimal Hewawitharana, Environmental Specialist II
Department of City Planning

FROM: Ali Poosti, Division Manager for
Wastewater Engineering Services Division
LA Sanitation

SUBJECT: **4051 SOUTH ALAMEDA STREET PROJECT – NOTICE OF COMPLETION AND AVAILABILITY OF DRAFT EIR (REVISED)**

This is a revised response to your December 22, 2015 letter requesting a review of your proposed industrial buildings project located at 4051 South Alameda Street, Los Angeles, CA 90058. LA Sanitation has conducted a preliminary evaluation of the potential impacts to the wastewater and stormwater systems for the proposed project.

WASTEWATER REQUIREMENT

LA Sanitation, Wastewater Engineering Services Division (WESD) is charged with the task of evaluating the local sewer conditions and to determine if available wastewater capacity exists for future developments. The evaluation will determine cumulative sewer impacts and guide the planning process for any future sewer improvements projects needed to provide future capacity as the City grows and develops.

Projected Wastewater Discharges for the Proposed Project:

Type Description	Average Daily Flow (GPD)
Proposed	
Building #1	46,560 GPD
Building # 2	20,160 GPD
Building # 3	32,640 GPD
Building # 4	32,640 GPD
Total	**132,000 GPD**

SEWER AVAILABILITY

The sewer infrastructure in the vicinity of the proposed project includes an existing 8-inch line that discharges into a 10-inch line on Martin Luther King Jr. Blvd, an existing 8-inch line on 41st St, an existing 8-inch line on 40th Pl., and an existing 10-inch line on Long Beach Ave. The sewage from all these sewers feed into a 10-inch line on Long Beach Ave before discharging into a 45-inch line on 41st Pl. Figure 1 shows the details of the sewer system within the vicinity of the

project. The current flow level (d/D) in the 8-inch lines and the 10-inch line on Long Beach Ave cannot be determined at this time without additional gauging.

The current approximate flow level (d/D) and the design capacities at d/D of 50% in the sewer system are as follows:

Pipe Diameter (in)	Pipe Location	Current Gauging d/D (%)	50% Design Capacity
8	Martin Luther King Jr. Blvd.	*	429,023 GPD
10	Martin Luther King Jr. Blvd.	25	360,084 GPD
8	40th Pl.	*	229,323 GPD
8	41st St.	*	229,323 GPD
10	Long Beach Ave.	*	360,084 GPD
45	41st Pl.	28	10.89 MGD
45	41st Pl.	40	11.47 MGD

* No gauging available

Based on the estimated flows, it appears the sewer system might be able to accommodate the total flow for your proposed project. Further detailed gauging and evaluation will be needed as part of the permit process to identify a specific sewer connection point. If the public sewer has insufficient capacity then the developer will be required to build sewer lines to a point in the sewer system with sufficient capacity. A final approval for sewer capacity and connection permit will be made at that time. Ultimately, this sewage flow will be conveyed to the Hyperion Treatment Plant, which has sufficient capacity for the project.

If you have any questions, please call Kwasi Berko of my staff at (323) 342-1562.

STORMWATER REQUIREMENTS

LA Sanitation, Watershed Protection Division (WPD) is charged with the task of ensuring the implementation of the Municipal Stormwater Permit requirements within the City of Los Angeles. We anticipate the following requirements would apply for this project.

POST-CONSTRUCTION MITIGATION REQUIREMENTS

The project requires implementation of stormwater mitigation measures. These requirements are based on Stormwater Low Impact Development (LID) requirements. The projects that are subject to LID are required to incorporate measures to mitigate the impact of stormwater runoff. The requirements are outlined in the guidance manual titled "*Development Best Management Practices Handbook – Part B: Planning Activities*". Current regulations prioritize infiltration, capture/use, and then biofiltration as the preferred stormwater control measures. The relevant documents can be found at: www.lastormwater.org. It is advised that input regarding LID requirements be received in the early phases of the project from WPD's plan-checking staff.

GREEN STREETS

The City is developing a Green Street Initiative that will require projects to implement Green Street elements in the parkway areas between the roadway and sidewalk of the public right-of-away to capture and retain stormwater and urban runoff to mitigate the impact of stormwater runoff and other environmental concerns. The goals of the Green Street elements are to improve the water quality of stormwater runoff, recharge local ground water basins, improve air quality, reduce the heat island effect of street pavement, enhance pedestrian use of sidewalks, and encourage alternate means of transportation. The Green Street elements may include infiltration systems, biofiltration swales, and permeable pavements where stormwater can be easily directed from the streets into the parkways and can be implemented in conjunction with the LID requirements.

CONSTRUCTION REQUIREMENTS

The project is required to implement stormwater control measures during its construction phase. All projects are subject to a set of minimum control measures to lessen the impact of stormwater pollution. In addition for projects that involve construction during the rainy season that is between October 1 and April 15, a Wet Weather Erosion Control Plan is required to be prepared. Also projects that disturb more than one-acre of land are subject to the California General Construction Stormwater Permit. As part of this requirement a Notice of Intent (NOI) needs to be filed with the State of California and a Storm Water Pollution Prevention Plan (SWPPP) needs to be prepared. The SWPPP must be maintained on-site during the duration of construction.

If there are questions regarding the stormwater requirements, please call Kosta Kaporis at (213) 485-0586, or WPD's plan-checking counter at (213) 482-7066. WPD's plan-checking counter can also be visited at 201 N. Figueroa, 3rd Fl, Station 18.

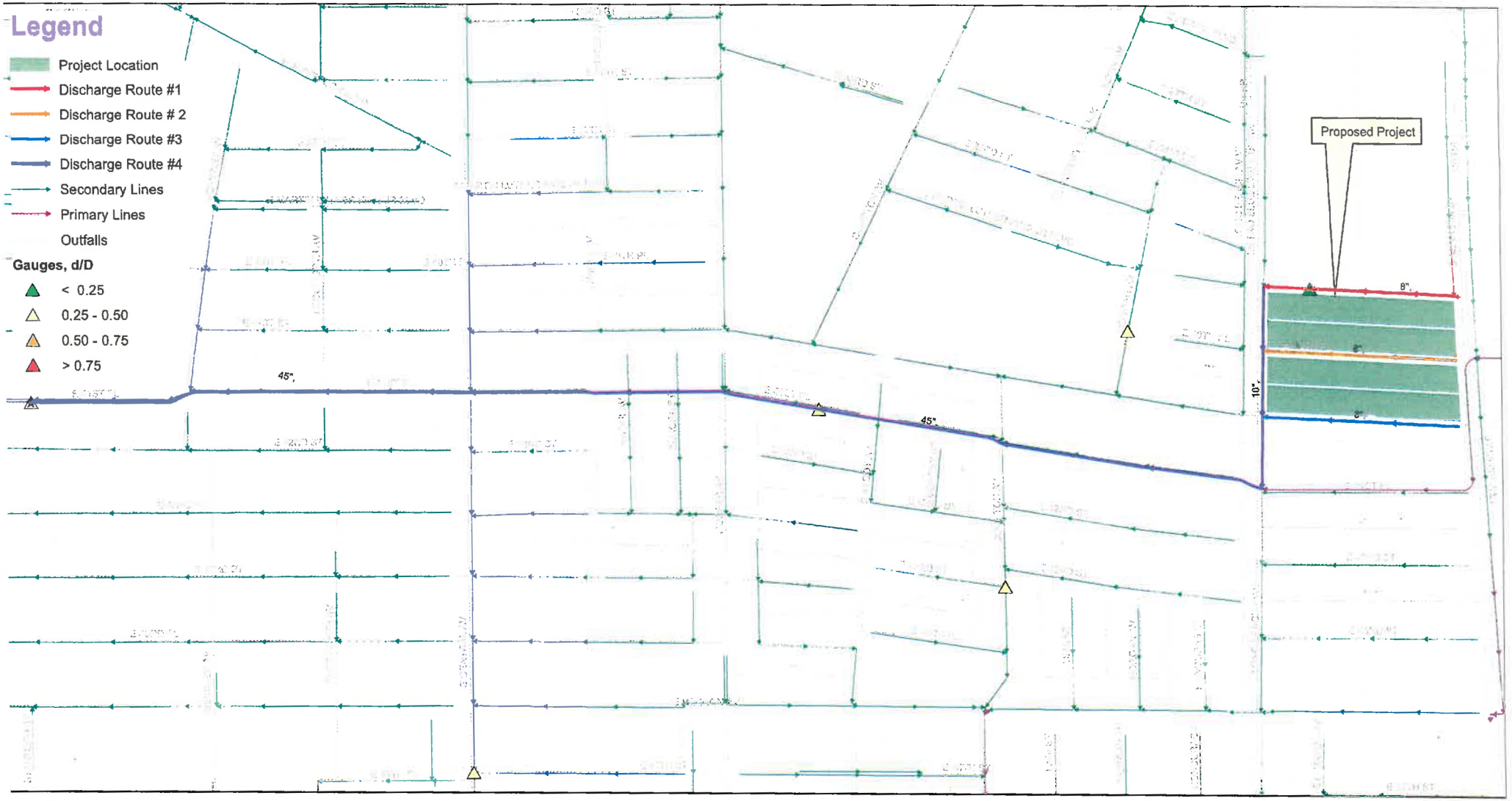
SOLID RESOURCE REQUIREMENTS

The City has a standard requirement that applies to all proposed residential developments of four or more units or where the addition of floor areas is 25 percent or more, and all other development projects where the addition of floor area is 30 percent or more. Such developments must set aside a recycling area or room for onsite recycling activities. For more details of this requirement, please contact Daniel Hackney of the Special Project Division at (213)485-3684.

KB/AP:as

Attachment: Figure 1 – Sewer Map

c: Kosta Kaporis, LASAN
Daniel Hackney, LASAN
Eduardo Perez, LASAN
William Lamborn, LASAN



Wastewater Engineering Services Division
Bureau of Sanitation
City of Los Angeles

environment LASANITATION
CITY OF LOS ANGELES

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FIGURE 1
4051 South Alameda Street
Sewer Map