SECTION 4.0 DISCUSSION OF ENVIRONMENTAL CHECKLIST QUESTIONS

4.1 AESTHETICS

Relevant elements of the proposed project related to aesthetics/visual character include the removal of existing buildings and visual changes associated with the on-site demolition and remediation activities (e.g., equipment, tent groundwater extraction and equipment enclosure). Existing perimeter vegetation, including street trees along Lambert Road and Harbor Boulevard would be retained. Existing security lighting would be removed with the buildings; however, lighting at Building 8 would remain until that building is removed following completion of remediation activities. New, temporary lighting to facilitate remediation activities would be installed within the project site.

Impact Analysis

Would the proposed project:

a) Have a substantial adverse effect on a scenic vista?

No Impact. As identified in Section 5.3, Aesthetics and Light/Glare, of The Fullerton Plan EIR, "scenic vistas in the City include views of the West and East Coyote Hills from the southern portion of the City, as well as distant views of the City and surrounding region from within these areas". The project site is at the northern boundary of the City and approximately 1.2 miles northeast of the West Coyote Hills and 2 miles northwest of East Coyote Hills. Views between the project site and these areas are obstructed by intervening development. The proposed project involves demolition of existing 1 and 2 level buildings and remediation of existing soils and groundwater contamination on the project site and would have no effect on a scenic vista. No mitigation is required.

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

No Impact. Based on The Fullerton Plan EIR and review of the California Department of Transportation (Caltrans) website, there are no designated state scenic highways within the City of Fullerton (Caltrans 2012). Additionally, based on review of Exhibit 5.3-1, Scenic Corridors, and Exhibit 5.3-2, Rural Streets, of The Fullerton Plan EIR, there are no scenic roadways designated in the City of Fullerton within the vicinity of the proposed project. As previously discussed in Section 2, the project site is currently developed with vacant buildings previously utilized for activities associated with BCI. The BCI Administration Building (Building 1) is a potential historic resource (refer to Section 4.5, Cultural Resources) and would be protected in place with implementation of the proposed project. Therefore, the proposed project would not have an adverse effect on scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway, or a locally designated rural street or scenic corridor. No mitigation is required.

c) Substantially degrade the existing visual character or quality of the site and its surroundings?

No Impact. The project site is currently developed with industrial uses comprised of 10 buildings and associated facilities. The on-site buildings are one level with the exception of Buildings 1 and Building 8 which are two levels. As previously shown on Exhibit 3, the project

site is completely surrounded by urban development; surrounding land uses include industrial and commercial uses and the UPRR is located directly to the east. The project site is visible from immediately surrounding land uses; existing development obstructs views from other vantage points.

Exhibits 7a through 7c provide photographs which depict views of the site from various vantage points along Lambert Road and Harbor Boulevard and represent temporary views from motorists and pedestrians traveling along these roadways adjacent to the project site. As shown in Views 1 and 2 (Exhibit 7a), there are a limited number of street trees along the northern property boundary formed by Lambert Road and views into the project site from these vantage points are largely unobstructed. Vacant Buildings 5 and 8 and a surface parking lot are visible from these vantage points. The buildings largely obstruct views to the south. Views 3 through 5 (Exhibits 7b and 7c) depict views from vantage points along Harbor Boulevard. As shown the mature street trees along the western property boundary and utility lines are the primary focal point in this area. The mature trees extend from Lambert Road to the southern portion of the project site and obstruct views into the project site and views further to the east.

Implementation of the proposed project would involve the demolition of the existing on-site buildings, with the exception of Building 1, and removal of parking lots and above-grade facilities associated with the existing buildings. During demolition activities at the site, there would be views of construction equipment, ongoing demolition activities, stockpiles of building debris, and haul trucks to remove the demolition debris. Following completion of the initial demolition activities remediation activities would be initiated. As previously described in Section 2, Project Description, Building 8 would be retained as a soil treatment processing center and soil stockpiles would be located near or within this building, and treatment equipment would be located in the building. Locating the equipment and stockpiling within Building 8 which is located at the northern boundary of the project site along Lambert Road would reduce views of remediation activities from off-site vantage points to the north. Building 8 would be removed following completion of soil remediation activities (expected at the end of 2014).

If enhanced in-situ bioremediation (EISB) is the selected groundwater treatment method, a structure to house groundwater extraction and treatment equipment would be needed. This structure would be approximately 20x20 feet, constructed with concrete cinder block or slatted fence, and would be located generally in the southwest portion of the project site. Existing perimeter landscaping would be maintained; therefore, views into the project site from Harbor Boulevard would continue to be obstructed during demolition and remediation activities, including the structure that may be needed for groundwater remediation.

The visual change associated with the proposed project is temporary in nature and the views would be typical of construction sites for industrial and commercial projects in an urban environment. The proposed demolition and remediation activities would not substantially degrade the existing visual character or quality of the site and its surroundings. No significant impact would occur and no mitigation is required.

d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

No Impact. The primary light source currently on the project site comes from the street light standards located along Harbor Boulevard and Lambert Road and on-site exterior security lighting attached to existing buildings. The existing lighting would be removed with the buildings; however, temporary lighting would be installed to facilitate proposed remediation activities. Project implementation would not result in substantially more light than what currently exists on

View 1: View from Lambert Road at UPRR tracks looking southwest to the project site.

View 2: View from Lambert Road looking south to the project site.

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Site Photographs

Exhibit 7a

Beckman Coulter Facility Demolition and Remediation Project

BonTerra CONSULTING

(Rev: 8-02-2013 JAZ) R:\Projects\Hargis\J0001\Graphics\ex7a_SP.pdf

View 3: View from Lambert Road/Harbor Boulevard intersection looking southeast to the project site.

View 4: View from Harbor Boulevard looking south.

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Site Photographs

Exhibit 7b

Beckman Coulter Facility Demolition and Remediation Project

BonTerra CONSULTING

(Rev: 8-02-2013 JAZ) R:\Projects\Hargis\J0001\Graphics\ex7b_SP.pdf

View 5: View from Harbor Boulevard looking north/northeast.

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Site Photographs

Exhibit 7c

Beckman Coulter Facility Demolition and Remediation Project

BonTerra CONSULTING

(Rev: 8-02-2013 JAZ) R:\Projects\Hargis\J0001\Graphics\ex7c_SP.pdf

site and would not involve and activities or equipment that would cause glare. No impact would result, and no mitigation is required.

Mitigation Program

No mitigation measures are required.

4.2 AGRICULTURE AND FORESTRY RESOURCES

There are no relevant elements of the proposed project related to agriculture and forestry resources.

Impact Analysis

Would the project:

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

b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?

c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220[g]), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104[g])?

d) Result in the loss of forest land or conversion of forest land to non-forest use?

e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?

***No Impact*.** Based on review of the 2010 California Department of Conservation, Farmland Mapping and Monitoring Program, there are no areas located on land designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance within the City of Fullerton. Additionally, the project site is located in an urbanized industrial area and there are no agricultural uses on the project site. Therefore, the proposed project would not covert farmland to non-agricultural uses. The zoning for the project site is M-G and M-P 200 (industrial use designations), and there are no areas within the City of Fullerton covered by a Williamson Act Contract. Therefore, the proposed project would not conflict with existing zoning for agricultural use, or a Williamson Act contract. No mitigation is required.

There are no designated forest land or timberland as defined in the *California Public Resources Code* (§§12220[g] and 4526, respectively) or timberland zoned “Timberland Production” in the City of Fullerton. Therefore, the proposed project would not result in the loss of forest land or conversion of forest land to non-forest use. No mitigation is required.

Mitigation Program

No mitigation measures are required.

4.3 AIR QUALITY

Relevant elements of the proposed project related to air quality include: (1) demolition of on-site buildings and paving; (2) the export of approximately 3,120 tons of demolition waste and 40 cy of PCB-contaminated soil excavated from the project site; (3) and the use of diesel-powered and other construction equipment during demolition and remediation (soils and groundwater) that would contribute to local and regional emissions. As described in Section 2, Project Description, demolition is expected to begin in September 2013 and last for approximately three months; soil remediation is expected to begin in October 2013 and would continue through October 2014. As further discussed in Section 2.5, Truck and Vehicular Circulation, demolition activities would generate approximately 10 round trips (twenty 1-way trips) on the peak day and disposal of contaminated soil would generate 2 round truck trips total (up to four 1-way trips). There would also be approximately 25 contractors working at the project site on a peak day and 10 to 12 workers on an average day traveling to the site.

Section 5.5, Air Quality, of The Fullerton Plan EIR includes information regarding the existing regulatory setting for air quality and applicable Federal, State and regional agencies with regulatory authority. The existing environmental setting—including geography in the South Coast Air Basin (SoCAB), climate, ambient air quality, primary sources of emissions, emissions inventory, sensitive receptors, and public health—is also described. With the exception of an update to South Coast Air Quality Management District (SCAQMD) Air Quality Management (AQMP), as discussed under Threshold “a”, this information remains applicable and is incorporated by reference into this IS.

The Fullerton Plan EIR Mitigation Measure

The following mitigation measure (MM) identified in The Fullerton Plan EIR is incorporated as part of the proposed project and assumed in the analysis and emissions modeling presented in this section. This MM will be included in the Mitigation Monitoring and Reporting Program for the proposed project.

MM AQ-1 Prior to issuance of any Grading Permit, the Community Development Director and the Building Official shall confirm that the Grading Plan, Building Plans, and specifications stipulate that, in compliance with SCAQMD Rule 403, excessive fugitive dust emissions shall be controlled by regular watering or other dust prevention measures, as specified in the SCAQMD’s Rules and Regulations. In addition, SCAQMD Rule 402 requires implementation of dust suppression techniques to prevent fugitive dust from creating a nuisance off-site. Implementation of the following measures would reduce short-term fugitive dust impacts on nearby sensitive receptors:

- All active portions of the construction site shall be watered twice daily to prevent excessive amounts of dust;
- Non-toxic soil stabilizers shall be applied to all inactive construction areas (previously graded areas inactive for 20 days or more, assuming no rain), according to manufacturers’ specifications;
- All excavating and grading operations shall be suspended when wind gusts (as instantaneous gust) exceed 25 miles per hour;
- On-site vehicle speed shall be limited to 15 miles per hour;

- All on-site roads shall be paved as soon as feasible, watered twice daily, or chemically stabilized;
- Visible dust beyond the property line which emanates from the project shall be prevented to the maximum extent feasible;
- All material transported off-site shall be either sufficiently watered or securely covered to prevent excessive amounts of dust prior to departing the job site;
- Track-out devices shall be used at all construction site access points;
- All delivery truck tires shall be watered down and/or scraped down prior to departing the job site;
- A construction relations officer shall be appointed to act as a community liaison concerning on-site construction activity including resolution of issues related to fugitive dust generation;
- Streets shall be swept at the end of the day if visible soil material is carried onto adjacent paved public roads and use of SCAQMD Rule 1186 and 1186.1 certified street sweepers or roadway; and
- Replace ground cover in disturbed areas as quickly as possible.

It should also be noted that MM AQ-8 requires that construction-related impacts be analyzed as required by the SCAQMD; the required analysis is presented below.

Impact Analysis

Would the project:

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

No Impact. The project is located in Orange County, in the South Coast Air Basin (SoCAB), where the South Coast Air Quality Management District (SCAQMD) is the agency principally responsible for comprehensive air pollution control. A regional agency, the SCAQMD works directly with the Southern California Association of Governments (SCAG), County transportation commissions, and local governments, and cooperates actively with all Federal and State government agencies. The SCAQMD develops rules and regulations; establishes permitting requirements for stationary sources; inspects emissions sources; and enforces such measures through educational programs or fines, when necessary.

The SCAQMD is directly responsible for reducing emissions from stationary (area and point), mobile, and indirect sources. It has responded to this requirement by preparing a sequence of Air Quality Management Plans (AQMPs). An AQMP establishes a program of rules and regulations directed at attaining the National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS). The regional plan applicable to the proposed project is the SCAQMD's AQMP.

On December 7, 2012, the SCAQMD adopted the 2012 AQMP, which is a regional and multi-agency effort (SCAQMD, California Air Resources Board [CARB], SCAG, and US Environmental Protection Agency [USEPA]). The 2012 AQMP incorporates the latest scientific and technical information and planning assumptions, including the 2012 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS); updated emission inventory methodologies for various source categories; and SCAG's latest growth forecasts (SCAQMD 2013a). On December 20, 2012, the 2012 AQMP was submitted to CARB and the USEPA for

concurrent review and approval for inclusion in the State Implementation Plan (SIP) (SCAQMD 2013a). The 2012 AQMP was approved by the CARB on January 25, 2013 (CARB 2013).

This section discusses the consistency of the proposed project with the 2012 AQMP. As identified in Section 5.5, Air Quality, of The Fullerton Plan EIR, pursuant to the SCAQMD CEQA Handbook, there are two key indicators of consistency:

1) Whether the project will result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations, or delay timely attainment of air quality standards or the interim emissions reductions in the AQMP.

2) Whether the project will exceed the assumptions in the AQMP based on the year of project build-out.

With respect to the first criterion, based on the air quality modeling analysis conducted for the proposed project (see the discussion provided below under Threshold "b"), demolition and remediation activities associated with the proposed project would not result in significant impacts based on the SCAQMD thresholds of significance and therefore would not increase the frequency or severity of existing air quality violations. The proposed project is not projected to contribute to the exceedance of any air pollutant concentration standards. There would be no short- or long-term local air quality impacts.

With respect to the second criterion, the project would not generate any new long-term air pollutant emissions, increase population or employment in the area, or exceed assumptions in the AQMP. Therefore, the proposed project is considered consistent with the region's AQMP. No impacts would occur and no mitigation is required.

b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?

Less Than Significant Impact. A project may have a significant impact where project-related emissions would exceed federal, State, or regional standards or thresholds, or where project-related emissions would substantially contribute to an existing or projected air quality violation.

The Federal Clean Air Act (42 *United States Code* [USC] §§7401–7671) requires the adoption of National Ambient Air Quality Standards (NAAQS) to protect public health and welfare from the effects of air pollution for seven air pollutants: ozone (O_3), carbon monoxide (CO), nitrogen dioxide (NO_2), sulfur dioxide (SO_2), respirable particulate matter 10 microns or less in diameter (PM10), fine particulate matter 2.5 microns or less in diameter (PM2.5), and lead (Pb). These pollutants are further described in Section 5.5, Air Quality, of The Fullerton Plan EIR. CARB has established additional State standards, which are generally more stringent than the NAAQS. The Federal and State standards are presented in Table 5.5-1, National and California Ambient Air Quality Standards, of The Fullerton Plan EIR.[3]

Regional air quality is described by whether the area has attained State and Federal standards, as determined by monitoring. Areas in nonattainment are required to prepare plans and implement measures to bring the region into attainment. When an area has been reclassified from nonattainment to attainment for a federal standard, the status is identified as "maintenance", and there must be a plan and measures that will keep the region in attainment

[3] It should be noted that on December 14, 2012, the USEPA Administrator approved a reduction of the federal annual PM2.5 standard from 15 $\mu g/m^3$ to 12 $\mu g/m^3$ effective in March 18, 2013.

for the following ten years. Table 4-1 summarizes the attainment status in the SoCAB for the seven criteria pollutants.

TABLE 4-1
ATTAINMENT DESIGNATIONS OF CRITERIA POLLUTANTS IN THE SOUTH COAST AIR BASIN

Pollutant	State	Federal
O_3 (1 hour)	Nonattainment	No Standard
O_3 (8 hour)		Extreme Nonattainment
PM10	Nonattainment	Attainment/Maintenance[a]
PM2.5	Nonattainment	Nonattainment
CO	Attainment	Attainment/Maintenance
NO_2	Nonattainment	Attainment/Maintenance
SO_2	Attainment	Attainment
Lead	Attainment/Nonattainment[b]	Attainment/Nonattainment[b]
All others	Attainment/Unclassified	No Standards

O_3: ozone; PM10: respirable particulate matter with a diameter of 10 microns or less; PM2.5: fine particulate matter with a diameter of 2.5 microns or less; CO: carbon monoxide; NO_2: nitrogen dioxide; SO_2: sulfur dioxide

[a] The SoCAB was redesignated for PM10 from nonattainment to attainment-maintenance effective July 26, 2013.

[b] The Los Angeles County portion of the SoCAB is designated nonattainment for lead; the remainder of the SoCAB is designated attainment.

Source: CARB 2012b; USEPA 2012; USEPA 2013b.

This section includes an evaluation of short-term air quality impacts associated with proposed demolition and remediation activities. The proposed project does not involve future development of the site; therefore, no long-term operational emissions would occur.

Mass Daily Emissions

Demolition Activities

The proposed project includes demolition of the existing structures in an area of approximately 45 acres. Air pollutant emissions associated with demolition activities would occur for approximately three months starting in October 2013, and an additional two weeks when Building 8 is removed following completion of soil remediation. Air pollutant emissions would occur as a result of the use of mechanical equipment, fugitive dust from demolition, hauling debris from the site, and emissions from vehicles driven to and from the site by construction (demolition) workers. A project with daily emission rates below the SCAQMD's established air quality significance thresholds (shown in Table 4-2) would have a less than significant effect on regional air quality. An assessment of project-generated, short-term air pollutant emissions was conducted using the California Emissions Estimator Model, Version 2013.2 (CalEEMod) computer model to quantify regional emissions and was supplemented by manual calculations (refer to Appendix A for the CalEEMod calculations) (SCAQMD 2013b). The CalEEMod calculations include dust control as required by SCAQMD Rule 403 (refer to The Fullerton Plan EIR MM AQ-1). The contractor for the proposed demolition has advised that most of their equipment has Tier 3 certified diesel engines and all of their equipment is certified Tier 2 or higher (AMPCO 2013). Therefore, the CalEEMod model includes corresponding emissions reductions. Table 4-2 presents the estimated maximum daily emissions during the proposed

project demolition, and compares the estimated emissions with the SCAQMD daily mass emission thresholds.

As shown in Table 4-2, short-term emissions generated by the proposed project would be less than the SCAQMD regional thresholds of significance. Therefore, the impact would be less than significant and project-specific mitigation for maximum daily emissions is not required during demolition activities.

TABLE 4-2
ESTIMATED MAXIMUM DAILY DEMOLITION EMISSIONS (LBS/DAY)

Year	VOC	NOx	CO	SOx	PM10	PM2.5
2013	11	25	60	<0.5	12	6
SCAQMD Thresholds	***75***	***100***	***550***	***150***	***150***	***55***
Exceeds SCAQMD Thresholds?	**No**	**No**	**No**	**No**	**No**	**No**

lbs/day: pounds per day; VOC: volatile organic compounds; NOx: nitrogen oxides; CO: carbon monoxide; PM10: respirable particulate matter with a diameter of 10 microns or less; PM2.5: fine particulate matter with a diameter of 2.5 microns or less.

Source: SCAQMD 2011 (thresholds). See Appendix A for CalEEMod output and calculations.

Remediation Activities

The project proponent is requesting DTSC approval of a Corrective Measures Study (CMS) and related work plans necessary for implementation of remedial activities. Remedial activities will be conducted to meet applicable DTSC requirements. The CMS recommends field pilot testing two on-site ex-situ remedial technologies including (1) evaporative desorption, and (2) chemical oxidation mixing. Regardless of which technology is selected, operation of the on-site, ex situ treatment system would require the following soil management activities; the type of emissions anticipated for the activity is also identified:

- Excavation of the soil that would be treated in the treatment equipment (soil handling PM10 emissions plus combustion emissions from mobile equipment);
- Stockpiling of soil (wind-blown PM10 emissions);
- Soil handling PM10 emissions and combustion emissions from mobile equipment associated with the loading of soil into the treatment equipment;
- Soil treatment VOC emissions from VOC-contaminated soils in the treatment;
- Soil handling PM10 emissions and combustion emissions from mobile equipment due to the unloading of soil from the treatment equipment;
- Wind-blown PM10 emissions associated with soil storage piles following treatment in the treatment equipment that would result from the project; and
- Soil handling PM10 emissions and combustion emissions from mobile equipment due to the disposal of treated soil (assumed to be backfilled on-site).

The remediation emission calculations are based on the maximum daily activities and are provided in Appendix A (Yorke 2013). On-site equipment emissions would be based on the typical equipment used for soil management at remediation sites. The project emissions are

compared to the SCAQMD CEQA significance thresholds for construction activities in Table 4-3. Based on these assumptions, remediation activities would not result in emissions that exceed the SCAQMD's CEQA significance thresholds.

TABLE 4-3
ESTIMATED MAXIMUM DAILY REMEDIATION EMISSIONS (LBS/DAY)

Activity	VOC	NOx	CO	SOx	PM10	PM2.5[a]
On-Site Equipment	5	29	26	<0.5	1	1
Earthwork	–	–	–	–	3	1
Soil Storage Piles	–	–	–	–	14	3
Operation of Remedial Technology[b]	14	–	–	–	1	<0.5
Total Emissions[c]	20	29	26	<0.5	19	5
SCAQMD Thresholds	***75***	***100***	***550***	***150***	***150***	***55***
Exceeds SCAQMD Thresholds?	**No**	**No**	**No**	**No**	**No**	**No**

lbs/day: pounds per day; VOC: volatile organic compounds; NOx: nitrogen oxides; CO: carbon monoxide; PM10: respirable particulate matter with a diameter of 10 microns or less; PM2.5: fine particulate matter with a diameter of 2.5 microns or less.

[a] PM2.5 estimated using PM2.5 fraction found in SCAQMD's *Final Methodology to Calculate PM2.5 and PM2.5 Significance Thresholds* (SCAQMD 2006).

[b] Emissions presented herein are based on the evaporative desorption technology. VOC emissions from the oxidation technology are expected to be comparable; PM10/PM2.5 emissions from the oxidation technology are expected to be substantially lower. The higher emissions from the evaporative technology are presented to ensure that emissions are not under-reported.

[c] Totals may not add due to rounding.

Source: Yorke 2013; SCAQMD 2011.

Groundwater Remediation Activities

The groundwater remediation activities are expected to follow the soil remediation activities, with minimal to overlap. The groundwater remediation may involve enhanced in-situ bioremediation (EISB) and/or groundwater extraction and treatment. The EISB process itself is not expected to generate emissions of criteria pollutants or toxic air contaminants, and thus would have no impact related to air quality emissions. Vehicle emissions from heavy equipment usage and worker commutes associated with EISB are expected to be minimal and would have a less than significant impact. As an alternative to, or in addition to EISB, groundwater may be pumped from the ground and treated using activated carbon adsorption to remove VOC. Groundwater treatment using activated carbon adsorption would not generate air emissions, and thus would have no impact to air quality. Vehicle emissions from heavy equipment usage (e.g., drilling equipment for extraction well installation, or haul truck traffic for carbon disposal) and worker commutes associated with groundwater extraction and treatment are expected to be minimal (notably less than discussed above for soils remediation) and would have a less than significant impact.

Overlap of Demolition and Remediation Activities

Remediation activities would begin in a limited capacity once demolition has progressed to a point where the remediation team can gain access to the contaminated soils. As demolition activities continue to expose new areas of soil, the remediation team would follow and continue the remediation process in these new areas. As such, there would be a period when demolition and remediation activities overlap. Table 4-4 identifies the potential combined emissions from demolition and remediation activities for each of the respective peak days. It should be noted that this estimation of combined emissions is conservative because remediation would only

occur in a limited capacity while demolition is ongoing. Remediation activities would not be maximized until the completion of demolition.

As shown in Table 4-4, short-term emissions generated by the proposed project would be less than the SCAQMD regional thresholds of significance. Therefore, the impact would be less than significant and project-specific mitigation for maximum daily emissions is not required during demolition and remediation activities.

TABLE 4-4
ESTIMATED MAXIMUM DAILY COMBINED EMISSIONS (LBS/DAY)

Activity	VOC	NOx	CO	SOx	PM10	PM2.5
Demolition (Table 4-2)	11	25	60	<0.5	12	6
Remediation (Table 4-3)	20	29	26	<0.5	19	5
Total Emissions	31	54	86	<0.5	31	11
SCAQMD Thresholds	***75***	***100***	***550***	***150***	***150***	***55***
Exceeds SCAQMD Thresholds?	**No**	**No**	**No**	**No**	**No**	**No**

lbs/day: pounds per day; VOC: volatile organic compounds; NOx: nitrogen oxides; CO: carbon monoxide; PM10: respirable particulate matter with a diameter of 10 microns or less; PM2.5: fine particulate matter with a diameter of 2.5 microns or less.
Source: SCAQMD 2011 (thresholds). See Appendix A for CalEEMod output and calculations.

Localized Significance Thresholds/Ambient Air Quality

In addition to the mass daily emissions thresholds established by the SCAQMD, short-term, on-site emissions of NO_2, CO, PM10, and PM2.5 are examined for local impacts to nearby sensitive receptors based on SCAQMD localized significance thresholds (LST). To assess local air quality impacts for projects without complex dispersion modeling, the SCAQMD developed screening (lookup) tables to assist lead agencies in evaluating impacts. The LST methodology is recommended to be limited to projects of five acres or less. For projects that exceed five acres, such as the proposed project, the five-acre LST look-up values can be used as a screening tool to determine which pollutants require detailed analysis (MacMillan 2011). For the purposes of a CEQA analysis, the SCAQMD considers a PM10/PM2.5 sensitive receptor to be a receptor such as a residence, hospital, convalescent facility where it is possible that an individual could remain for 24 hours. Commercial and industrial facilities are not included in this definition of a sensitive receptor because employees do not typically remain on site for a full 24 hours. The closest receptors to the project site are the single-family homes and Sonora High School located approximately 200 meters north of the site. Because the NO_2 and CO ambient air quality standards are provided for 1-hour exposures, sensitive receptors for local concentrations of these pollutants include employees of adjacent commercial and industrial land uses, as it is expected that an employee could remain on-site for an hour or more.

<u>Demolition Activities</u>

Table 4-5 shows the maximum daily on-site emissions for demolition activities compared with the SCAQMD thresholds. As shown in therein, the local emissions from the proposed demolition activities would be less than the thresholds of significance and no significant impact would result.

TABLE 4-5
LOCAL SIGNIFICANCE THRESHOLD EMISSIONS

	Emissions (lbs/day)			
	NOx[a]	**CO**	**PM10**	**PM2.5**
Demolition maximum daily on-site emissions	13	20	2	2
LST Thresholds: 5-acre site	221	1,311	78	34
Exceed 5-acre threshold?	**No**	**No**	**No**	**No**

NOx: nitrogen oxides; CO: carbon monoxide; PM10: particulate matter with a diameter of 10 microns or less; PM2.5: particulate matter with a diameter 2.5 microns or less; lbs: pounds; LST: localized significance threshold

Note: Data is for SCAQMD Source Receptor Area 16, North Orange County, 5-acre site, and 200 meter receptor distance for PM10/2.5 and 25-meter receptor distance for NOx and CO.

[a] In the LST methodology, NOx emissions thresholds are used to evaluate NO_2 concentrations.

Source: SCAQMD 2009.

Remediation Activities

Table 4-6 shows the maximum daily on-site emissions for remediation activities compared with the SCAQMD thresholds. As shown, the local emissions from the proposed remediation activities would be less than the thresholds of significance and no significant impact would result.

TABLE 4-6
LOCAL SIGNIFICANCE THRESHOLD EMISSIONS

	NOx[a]	**CO**	**PM10**	**PM2.5[b]**
	Emissions (lbs/day)			
Remediation maximum daily on-site emissions	24	4	8	2
LST Thresholds: 5-acre site	221	1,311	78	34
Exceed 5-acre threshold?	**No**	**No**	**No**	**No**

NOx: nitrogen oxides; CO: carbon monoxide; PM10: particulate matter with a diameter of 10 microns or less; PM2.5: particulate matter with a diameter 2.5 microns or less; lbs: pounds; LST: localized significance threshold

[a] In the LST methodology, NOx emissions thresholds are used to evaluate NO_2 concentrations.

[b] PM2.5 estimated using PM2.5 fraction found in SCAQMD's *Final Methodology to Calculate PM2.5 and PM2.5 Significance Thresholds* (SCAQMD 2006).

Note: Data is for SCAQMD Source Receptor Area 16, North Orange County, 5 acre site, and 200 meter receptor distance for PM10/2.5 and 25 meter receptor distance for NOx and CO.

Source: Yorke 2013; SCAQMD 2009.

c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable Federal or State Ambient Air Quality Standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

Less Than Significant Impact. As identified in Table 4-1, Orange County is a nonattainment area for O_3, PM10, PM2.5, and NO_2. The proposed project would generate PM10, PM2.5, NO_2, and O_3 precursors VOC and NOx during short-term demolition and remediation activities. As demonstrated under Threshold "a" above, the proposed project would not conflict with the 2012 AQMP. In addition, as detailed in response to Threshold "b", short-term emissions would be substantially less than the SCAQMD regional and localized significance thresholds.

Short-term cumulative impacts related to air quality could occur if project construction and nearby construction activities were to occur simultaneously. In particular, with respect to local impacts, cumulative construction particulate (i.e., fugitive dust) impacts are considered when projects are located within a few hundred yards of each other. There are no known major construction projects within a few hundred yards of the project site that would occur concurrently with the proposed project. The City of La Habra has planned improvements at the intersection of Lambert Road and Harbor Boulevard; however, this is not a major construction project that would result in substantial air quality emissions. As shown in Tables 4-2 and 4-3, emissions associated with demolition and remediation activities would be below the SCAQMD regional significance thresholds. Therefore, emissions of nonattainment pollutants from the proposed project and the adjacent intersection project, should they occur at the same time, would not be cumulatively considerable and project impacts would be less than significant; no mitigation is required.

d) Expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant Impact. A significant impact may occur when a project would generate pollutant concentrations to a degree that would significantly affect sensitive receptors, which include populations that are more susceptible to the effects of air pollution than the population at large. Exposure of sensitive receptors is addressed for the following situations: CO hotspots; diesel exhaust emissions; toxic air contaminants (TAC) from soil remediation; local emissions of NOx, CO, PM10, and PM2.5; and asbestos and lead paint during demolition.

A CO hotspot is an area of localized CO pollution caused by severe vehicle congestion on major roadways, typically near intersections. If a project increases average delay at signalized intersections operating at Level of Service (LOS) E or F, or causes an intersection that would operate at LOS D or better without the project to operate at LOS E or F with the project, a quantitative screening is required. The project would not generate substantial vehicular trips. During demolition activities approximately 10 round trips or less per day for a period of up to 3 months would be generated. During remediation, disposal of PCB-contaminated soil would require only 2 round truck trips total. There would also be approximately 25 contractors working at the project site on a peak day and 10 to 12 workers on an average day traveling to the project site. This amount of short-term traffic would not generate localized CO impacts.

Demolition and remediation activities would result in short-term diesel exhaust emissions from heavy-duty equipment on site. CARB identified particulate exhaust emissions from diesel-fueled engines (diesel PM) as TACs in 1998. Demolition and remediation activities would generate diesel PM emissions through the use of off-road and on-road diesel equipment used to transport materials from the project site. Exposure is a combination of the emissions rate and the length of time exposed, with exposures calculated over periods of 70 years. The proposed project would have relatively little diesel equipment, and the working period would be considerably less than the 70-year exposure timeframe (less than one year). The exposure to nearby individuals would be less than threshold levels, and the impact would be less than significant. No mitigation is required.

The soil remediation activities may cause emissions of small amounts of chemicals regulated by the SCAQMD as TACs, including Tetrachloroethylene (PCE), Trichloroethylene (TCE), and breakdown products of PCE and TCE, including carbon tetrachloride (CTC), 1,1-dichloroethane (1,1-DCA), ethylene dichloride (1,2-DCA), 1,1-dichloroethylene (1,1-DCE), and chloroform. Also, the soil may contain arsenic and cadmium, which could be emitted as particulate matter during soil management activities associated with the remediation. TAC emissions were characterized for the evaporative desorption technology; the emissions are summarized in

Table 4-7. It should be noted that the volatile TAC emissions from the oxidation technology are expected to be comparable to those from the evaporative desorption technology; the non-volatile TACs (i.e., arsenic and cadmium) are expected to be lower, as these TACs would be emitted as PM10 and PM2.5, which are expected to be lower with the oxidation technology.

TABLE 4-7
SUMMARY OF TAC EMISSIONS

Toxic Air Contaminant	MHU (lb/hr)	MHC (lb/hr)	MAC (lb/yr)
Tetrachloroethylene (PCE)	3.20E+00	8.00E-03	5.84E+01
Trichloroethylene (TCE)	1.68E+01	4.20E-02	3.07E+02
Carbon Tetrachloride (CTC)	3.20E+00	8.00E-03	5.84E+01
1,1-Dichloroethane (1,1-DCA)	3.20E+00	8.00E-03	5.84E+01
Ethylene Dichloride (1,2-DCA)	3.20E+00	8.00E-03	5.84E+01
1,1-Dichloroethylene (1,1-DCE)	3.20E+00	8.00E-03	5.84E+01
Chloroform	3.20E+00	8.00E-03	5.84E+01
Arsenic	3.56E-06	3.57E-07	2.61E-03
Cadmium	1.68E-05	1.69E-06	1.23E-02

lb/hr: pounds per hour; MHU: maximum hourly uncontrolled emissions; MHC: maximum hourly controlled emissions; MAC: maximum annual controlled emissions; lb/year: pounds per year

See Appendix A for supporting calculations.

A health risk assessment (HRA) was prepared pursuant to SCAQMD Rule 1401 guidelines for the TAC emissions. The maximum individual cancer risk (MICR) for the nearest residential and commercial receptors was found to be less than the SCAQMD significance threshold of 1 in one million for theoretical cancer risk, the chronic hazard indices (HIC) for the residential and commercial receptors were found to be less than the SCAQMD significance threshold of 1, and the acute hazard index (HIA) was found to be less than the SCAQMD significance threshold of 1. The results of the HRA are summarized in Table 4-8. The exposure of persons to TACs from soil remediation activities would be less than significant. No mitigation is required.

TABLE 4-8
SUMMARY OF HRA RESULTS

Parameter	Results	Threshold	Significant? (Yes/No)
MICR Residential	1.92 E-07	1 E-06	No
MICR Commercial	5.34 E-07	1 E-06	No
HIC Residential	0.1404	1	No
HIC Commercial	0.3480	1	No
HIA	0.0456	1	No

MICR: maximum individual cancer risk; HIC: chronic hazard index; HIA: acute hazard index

See Appendix A for supporting calculations

Exposure of persons to NOx, CO, PM10, and PM2.5 emissions is discussed in response to Threshold “b” above. No significant impacts would result.

Exposure of persons to asbestos and lead paint during demolition is addressed in Section 5.7, Hazards and Hazardous Materials, of this IS. This potential impact is less than significant with implementation of identified Regulatory Requirements (RRs).

e) Create objectionable odors affecting a substantial number of people?

No Impact. According to the SCAQMD *CEQA Air Quality Handbook* (SCAQMD 1993), land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. The proposed project does not include any uses identified by the SCAQMD as being associated with odors and therefore would not produce objectionable odors. As such, the proposed project would have a less-than-significant impact in regards to objectionable odors.

Mitigation Program

No mitigation measures are required.

4.4 BIOLOGICAL RESOURCES

Relevant elements of the proposed project related to biological resources include (1) removal of ornamental trees and vegetation within the project site during demolition activities, and (2) retention of perimeter landscaping, including street trees, along Harbor Boulevard and Lambert Road.

Impact Analysis

Would the project:

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

No Impact. A site visit was conducted on May 2, 2013, by Jeremy Smith, field biologist and Teri Copeland, DABT to identify plant and animal species that are currently present at the site. As previously identified, the project site is within an urban area and entirely surrounded by development, which consists primarily of commercial and industrial uses. The project site is considered urban/developed consisting of abandoned office buildings and warehouses. Open areas between buildings are identified as ornamental landscaping, and ruderal vegetation communities. The western portion of the project site along Harbor Boulevard is landscaped with mature trees and turf. In paved areas around the buildings such as parking lots, walkways and loading docks, both ornamental and ruderal species of plants were growing within cracks in the asphalt/concrete. A limited number of regional native plants were found on-site, including coyote brush (*Baccharis pilularis*), black willow (*Salix gooddingii*), and bulrush (*Scirpus* sp.). Wildlife species typical of urban and developed areas were identified at the site. There was evidence of common urban nesting birds and a limited number of unidentified common lizard and common small mammals (e.g., rodents) (Copeland & Associates 2013).

There are no natural or sensitive biological resources present on site and implementation of the project would not impact any candidate, sensitive, or special status species. There would be no impact and no mitigation is required.

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

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

No Impact. The project site does not contain riparian habitat, a sensitive natural vegetation community, wetlands, or other areas under the jurisdiction of the California Department of Fish and Wildlife or U.S. Army Corps of Engineers. As described above, the project site is in an urban area, is developed with industrial uses, and has a limited amount of ornamental landscaping. Therefore, it does not support any sensitive habitats. No impacts to riparian habitats or sensitive natural vegetation communities would result from project implementation and no mitigation is required

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

No Impact. Due to the presence of trees on-site, primarily along Harbor Boulevard, there is the potential to support birds subject to the Migratory Bird Treaty Act (MBTA). The MBTA prohibits activities that result in the direct take (defined as killing or possession) of a migratory bird. This includes the nests of all bird species, including common species. Existing site perimeter trees would not removed during the proposed demolition and remediation activities. Additionally, demolition activities that would involve removal of vegetation internal to the project site would not be initiated until September 2013 and would occur outside the peak nesting season which is from February 1 and August 31. The project site and surrounding areas are developed and do not support any other wildlife movement. Therefore, no impact would result and no mitigation is required.

e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

No Impact. As identified in Section 5.11, Biological Resources, of The Fullerton Plan EIR, The Fullerton Community Forestry Ordinance (Municipal Code Chapter 9.06 et. seq.) seeks to create and maintain a unified urban-forest resource within the City. The Community Forest Ordinance addresses the planning, planting, maintenance, and removal of all trees and other landscape material in any street or other public area; over any landscape material in any street median, parkway strip or other landscaped portion of a public right-of-way; over trees and other landscape material in other public spaces under the jurisdiction of the City such as parks, trails and public buildings; and over certain trees on private property. It also allows for the designation and protection of Landmark Trees[4].

The proposed project would not involve the removal or planting of any trees within public right-of-way, and existing street trees along Harbor Boulevard and Lambert Road would be retained in place. No impact would result and no mitigation is required.

[4] "Landmark Tree" means any tree which has been found to be of high value because of its type, size, age or historic associations, and has been designated by resolution of the City Council as a landmark tree" (City Municipal Code, Section 9.06.030(I)).

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

No Impact. As identified in Section 5.11, Biological Resources, of The Fullerton Plan EIR, one habitat conservation plan, the Coyote Hills East Habitat Conservation Plan (HCP), exists within the City of Fullerton. The HCP is located in the northeastern part of the City and was developed in response to the Coyote Hills East project. The Coyote Hills East HCP was prepared to protect significant biological resources located within the site, including California gnatcatcher, cactus wren, and coastal sage scrub. The proposed project is not located within the area addressed by the Coyote Hills East HCP and would not conflict with the HCP. No mitigation is required.

Mitigation Program

No mitigation measures are required.

4.5 CULTURAL RESOURCES

Relevant elements of the proposed project related to cultural resources include (1) protection of the Administration Building (Building 1) during demolition activities, and (2) excavation of contaminated soils during remediation activities to depths of approximately 15 to 20 feet below the ground surface (bgs) that would extend into native soils.

As identified in Section 5.10, Cultural Resources, of The Fullerton Plan EIR, Federal, State, and local governments have developed laws and regulations designed to protect significant cultural resources that may be affected by actions that they undertake or regulate. The National Environmental Policy Act (NEPA), National Historic Preservation Act (NHPA), and the California Environmental Quality Act (CEQA) are the basic Federal and State laws governing preservation of historic and archaeological resources of national, regional, State, and local significance. A detailed discussion of these regulations is provided in The Fullerton Plan EIR and is incorporated by reference in this IS.

The Fullerton Plan EIR Mitigation Measures

The following mitigation measure (MM) identified in The Fullerton Plan EIR is incorporated as part of the proposed project and assumed in the analysis presented in this section. This MM will be included in the Mitigation Monitoring and Reporting Program for the proposed project.

MM CR-4 In the event that human remains are unearthed during excavation and grading activities of any future project, all activity shall cease immediately. Pursuant to State Health and Safety Code Section 7050.5, no further disturbance shall occur until the County coroner has made the necessary findings as to origin and disposition pursuant to Public Resources Code Section 5097.98. If the remains are determined to be of Native American descent, the coroner shall within 24 hours notify the Native American Heritage Commission (NAHC). The NAHC shall then contact the most likely descendant of the deceased Native American, who shall serve as consultant on how to proceed with the remains.

Impact Analysis

Would the project:

a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?

No Impact. As discussed further under Threshold "b" below, a records search was conducted at the South Central Coastal Information Center (SCCIC) located at California State University, Fullerton. The SCCIC is the designated branch of the California Historical Resources Information System (CHRIS), one of ten statewide, which houses records of archaeological and historic resources in Orange, Los Angeles, and Ventura Counties. Data sources consulted at the SCCIC included the Historic Property Data File (HPDF) maintained by the California Office of Historic Preservation (OHP). The HPDF contains listings for the California Historic Register of Historic Resources (CRHR), National Register of Historic Place (NRHP), California Historical Landmarks (CHL), and California Points of Historical Interest (CPHI). No historic resources were identified within the project site. However, Building 1, the Administration Building at the Beckman Coulter complex, has been identified as a "Potential/Possible Significant Property" in The Fullerton Plan EIR. Based on this designation, a preliminary historic resources assessment of the project site was conducted by Daly & Associates (Daly 2013a).

In order to identify and evaluate the buildings, structures, and features that are associated with the Beckman Coulter complex, a multi-step methodology was utilized. An inspection of the existing structures and associated features, as well as a review of accessible archival sources regarding Beckman Coulter, were performed to document existing conditions and assist in assessing and evaluating the property for significance. Photographs were taken of buildings and structures, including photographs of architectural details or other points of interest, during the on-site survey. The following tasks were performed:

- The National Register and the California Historical Resources Inventory were searched.
- Site-specific research was conducted utilizing maps, City directories, newspaper articles, historical photographs, and other published sources.
- Available blueprints, drawings, and other building records related to the Beckman Coulter property were provided by the City of Fullerton.
- Ordinances, statutes, regulations, bulletins, and technical materials relating to Federal, State, and local historic preservation, designation assessment processes, and related programs were reviewed and analyzed.
- A site visit and pedestrian-level inspection of the Beckman Coulter complex was performed on December 10, 2012.

The present-day complex is comprised of one stand-alone Administration Building (also referred to as Building 1), located in the western portion of the parcel facing North Harbor Boulevard, and Buildings 2 through 11. Buildings 2 through 11 contained the research, testing, and manufacturing of the scientific instruments produced by Beckman Instruments/Beckman Coulter, and are located to the east of the Administration Building (refer to Exhibit 3 provided in Section 2, Project Description). The Administration Building, Building 2, and Building 3, were the first to be constructed on the site starting in 1953.

The complex, which was constructed for Beckman Instruments, Incorporated, was designed by Architect, Lawrence W. Davidson, who was the project architect and engineer for The Donald H.

Warren Company of Los Angeles. Except for the Administration Building, the buildings constructed for plant operations have simple, rather plain exteriors. They are rectangular in mass, with flat roofs and structural steel framing systems, and a single band of metal-framed ribbon windows spanning the exterior walls. The walls of the plant buildings were designed to be moved or rearranged to allow for growth or reassignment of interior space. Covered exterior walkways outside of the plant buildings were erected so that employees could walk from the Administration Building to their production units without having to go through the factory floor to their destination. Buildings 2 through 11 are not considered eligible for listing at a local, State, or national level and are not considered historically significant.

While the plant buildings are of a straight-forward utilitarian design, the Administration Building combines the values of International style Modern architecture with clean geometric lines, wide expanses of glass, wide overhanging eaves, and contrasting vertical and horizontal elements. Information about the history of the buildings located on the Beckman Coulter site was obtained from historic photographs, newspaper articles, and architectural magazines. These records support the determination that the Administration Building located on the Beckman Coulter complex at 4300 North Harbor Boulevard is eligible for Local Landmark listing in the City of Fullerton and supports the City of Fullerton's determination that the Administration Building is a potential Significant Property as stated in Table 5.10-1 of The Fullerton Plan EIR. The Administration Building is not listed in either the NRHP or the CRHR. Because the Administration Building is eligible to be a Local Landmark in the City of Fullerton and could potentially be eligible for listing in the NRHP or CRHR, the proposed project does not involve demolition of this building.

Daly & Associates reviewed the proposed demolition and remediation plan to determine the potential for impacts to significant historic resources (the Administration Building) (Daly 2013b). The Administration Building was the only building, structure, object, or landscape, on the Beckman Coulter complex that was determined to be a significant historic resource. The other buildings on the complex were used for the housing of Beckman Coulter's manufacturing, testing, and research and design activities and were designed as straightforward, large, industrial-style rectangular-massed structures. The removal of the industrial-use buildings on the complex would not adversely impact the significance of the Administration Building or its ability to convey its historic significance as an excellent example of International style architecture in Fullerton and Orange County.

As identified in Section 2, Project Description, under Demolition Activities, a buffer area would be established around the Administration Building to avoid any unintentional physical contact from surrounding construction/demolition and remediation activities to the building (refer to Exhibit 4). A covered walkway awning connects the Administration Building to Building 2. To avoid physical impacts to the Administration Building, the walkway awning would be left in place and detached from Building 2 at the east end of the awning. Based on the proposed demolition plan which includes retaining the Administration Building and attached walkway awning, no impacts to historic resources would result. As a part of the proposed project, demolition and construction monitoring by a qualified Architectural Historian would occur to ensure the protection of the Administration Building (refer to PDF Cult-1).

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?

Less Than Significant with Mitigation Incorporated. On July 22, 2013, Patrick Maxon, Cultural Resources Director at BonTerra Consulting conducted a records search at the SCCIC located at California State University, Fullerton. The review consisted of an examination of the

U.S. Geological Survey's (USGS) La Habra 7.5-minute quadrangles to evaluate the project area for any sites recorded or cultural resources studies conducted on the parcel and within a one-half mile radius. Data sources consulted at the SCCIC included archaeological records, Archaeological Determinations of Eligibility (DOE), historic maps, and, as previously identified, the HPDF maintained by the OHP.

The literature review revealed that one cultural resource has been recorded, and 18 cultural resources investigations have been conducted, within 1 mile of the project site. Four of the studies were located within one-half mile of the project site, but none included any portion of the project site. The majority of the cultural resources investigations are literature reviews and pedestrian surveys for road projects and utilities; eight surveys were for proposed cellular sites. The one cultural resource—CA–LAN–796—located on the northwest corner of the intersection of Imperial Highway at Puente Street, was originally recorded by Brown (1979) as an artifact and ecofact scatter consisting of a mix of prehistoric (ground and flaked stone tools and marine shell) and historic (bottle glass) artifacts. In 1980, the site was revisited by Jane Rosenthal from California State University, Long Beach, who determined through lithic analysis that the items recorded as ground and flaked stone tools were in fact not artifactual. The site is therefore not an aboriginal site. The marine shell present is fossiliferous and was likely introduced to the site by farmers who used it to help neutralize acidic soils. The SCCIC bibliography of studies within one-mile, the HPDF for the City of La Habra, and the site record for CA–LAN–796 is available for review at the City of Fullerton Community Development Department.

Excavations for removal of VOC- and PCB-contaminated soils would occur in specific areas throughout the project site (refer to Exhibits 5 and 6) and could reach depths of 15 to 20 feet bgs. Based on the results of the records search, there are no known archaeological sites located within the project site or immediately surrounding area. Additionally, due to the highly developed nature of the project site and surrounding areas, any archaeological resources which may have existed on the project site have likely been previously unearthed or disturbed. However, consistent with the conclusions of The Fullerton Plan EIR, there is a potential that previously undiscovered archaeological resources would be encountered during excavation for remediation activities, resulting in a potentially significant impact. In the event that archaeological resources are discovered during construction activities, resulting in a potential loss of a previously unknown resource, MM Cult-1 (which implements MM CR-3 from The Fullerton Plan EIR) would reduce potential impacts to a level considered less than significant.

c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Less Than Significant with Mitigation Incorporated. The project site is within an urbanized area and has been previously graded and developed. As identified in Section 5.10, Cultural Resources, of The Fullerton Plan EIR, paleontological resources have been identified within the area north of the West Coyote Hills Focus Area and there is the potential that future development within that Focus Area could impact paleontological resources. The remaining Focus Areas, including the North Industrial Focus Area which includes the project site, are primarily developed or have previously been developed or disturbed and no significant paleontological sites have been documented within the City. However, the possibility exists that as yet unidentified paleontological sites occur within the City. Therefore, future development anticipated by The Fullerton Plan could indirectly result in impacts to undiscovered paleontological resources through remediation, demolition, or construction activities.

Excavations for removal of contaminated soils would be up to 15 to 20 feet deep below the ground surface. Any surficial paleontological resources that may have existed at one time on the

project site have likely been previously unearthed or disturbed; however buried paleontological resources could still remain.

Surficial sediments in the project area consist primarily of younger Quaternary alluvial deposits with older Quaternary alluvial sediments exposed in the northeast quarter and southern portion of the project site, and occurring at various depths below the younger alluvium. Artificial fills are present in various areas to a maximum depth of 10 feet (Albus-Keefe 2013). Excavations at the project site have the potential to encounter significant vertebrate fossils in older Quaternary sediments. The uncovering of such resources could occur during removal of contaminated soils. Therefore, construction activities could impact undiscovered paleontological resources. This potential loss of resources is considered a potentially significant impact. Implementation of MM Cult-1 (which implements MM CR-3 from The Fullerton Plan EIR) would reduce this impact to a level considered less than significant.

d) Disturb any human remains, including those interred outside of formal cemeteries?

Less Than Significant Impact. As identified Section 5.10, Cultural Resources, of The Fullerton Plan EIR, no conditions exist that suggest human remains are likely to be found in the City. Due to the level of past disturbance on the project site, it is not anticipated that human remains, including those interred outside of formal cemeteries, would be encountered during earth removal or disturbance activities. The Native American Heritage Commission (NAHC) Sacred Lands File (SLF) search did not indicate the presence of Native American cultural resources within the City.

If human remains were found, those remains would require proper treatment, in accordance with applicable laws. State of California Public Resources Health and Safety Code Sections 7050.5-7055 describe the general provisions for human remains. Specifically, Health and Safety Code Section 7050.5 describes the requirements if any human remains are accidentally discovered during excavation of a site. In addition, the requirements and procedures set forth in California Public Resources Code Section 5097.98 would be implemented. If human remains are found during excavation, excavation must stop in the vicinity of the find and any area that is reasonably suspected to overlie adjacent remains until the County coroner has been called out, and the remains have been investigated and appropriate recommendations have been made for the treatment and disposition of the remains. Following compliance with State regulations, which detail the appropriate actions necessary in the event human remains are encountered, and compliance with MM CR-4 from The Fullerton Plan EIR, potential impacts would be less than significant.

Mitigation Program

Project Design Feature

PDF Cult-1 The project proponent shall retain the services of a qualified Architectural Historian who meets the Secretary of Interior's Professional Qualification Standards to provide demolition and construction monitoring, and to provide input and review of the proposed demolition/construction plan documents prior to implementation of project activities. A post-construction survey shall also be undertaken to document that adverse effects have not occurred to the Beckman Coulter Administration Building. The post-construction survey report shall be prepared as a letter report to the City of Fullerton Community Development Department.

Mitigation Measure

MM Cult-1 In the event that cultural resources (archaeological, historical, paleontological) resources are inadvertently unearthed during excavation activities associated with soil remediation, the contractor shall immediately cease all earth-disturbing activities within a 100-foot radius of the area of discovery. The project proponent shall retain a qualified professional (i.e., archaeologist, historian, architect, paleontologist, Native American Tribal monitor), subject to approval by the City of Fullerton, to evaluate the significance of the find and determine an appropriate course of action. If avoidance of the resource(s) is not feasible, salvage operation requirements pursuant to Section 15064.5 of the State CEQA Guidelines shall be followed. After the find has been appropriately avoided or mitigated, work in the area may resume.

4.6 GEOLOGY AND SOILS

Relevant elements of the proposed project related to geology and soils include: (1) excavation of contaminated soils during remediation activities to depths of approximately 15 to 20 feet below the ground surface (bgs) that would extend into native soils; (2) removal of groundwater for treatment of VOC-contamination; and (3) construction of a secure enclosure for the groundwater extraction and treatment system.

Section 5.7.2 of The Fullerton Plan EIR provides a discussion of applicable Federal, State and local regulatory policies and laws that apply to geologic, soils and seismic conditions. Most relevant to the proposed project is the California Building Code (CBC) which applies to all applications for building permits, and the Fullerton Municipal Code (FMC) which includes various chapters that address geology and soils, including Chapter 12.18 (Water Quality Ordinance) and Chapter 14.03 (Building Code). The Water Quality Ordinance includes conditions and requirements related to the reduction or elimination of pollutants (including eroded soils) in stormwater runoff from a project site, and the Building Code includes sections which address erosion control and associated devices. This information is incorporated by reference into this IS, and discussed below, as appropriate.

Impact Analysis

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

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?

No Impact. The project site, as with the entire Southern California region, is subject to secondary effects from earthquakes. As identified in The Fullerton Plan EIR (Section 5.7.5, Geology and Soils), the City of Fullerton is not affected by a State-designated Earthquake Fault Zone. Therefore, implementation of the proposed project would not expose people or structures to potential substantial adverse effects involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map.

ii) Strong seismic ground shaking?

iii) Seismic-related ground failure, including liquefaction; or

No Impact. As identified in Section 5.7, Geology and Soils, of The Fullerton Plan EIR, the City of Fullerton, similar to the rest of California, is located within a seismically active region as a result of being located near the active margin between the North American and Pacific tectonic plates. The local and regional faults that have the potential to affect the City are depicted on Exhibit 5.7-1, Regional Faults, of The Fullerton Plan EIR. The closest active fault to the project site is the Whittier Elsinore Fault located approximately two miles northeast of the project site.

As identified on Exhibit 5.7-3, Liquefaction/Landslide Potential, of The Fullerton Plan EIR the southern portion of the project site is within a State designated area of potential liquefaction. Liquefaction can be defined as the loss of soil strength or stiffness due to a buildup of porewater pressure during a seismic event and is associated primarily with relatively loose, saturated fine- to medium-grained unconsolidated soils. Seismic ground shaking of relatively loose, granular soils that are saturated or submerged can cause the soils to liquefy and temporarily behave as a dense fluid. Liquefaction is caused by a sudden temporary increase in pore-water pressure due to seismic densification or other displacement of submerged granular soils.

While the project site would potentially be subject to seismic ground shaking and seismic-related hazards, such as liquefaction, due to earthquakes, the project does not propose construction of habitable structures of any kind. The proposed demolition and soil remediation activities would not expose people or structures to potentially adverse effects related to seismic ground shaking. The proposed groundwater remediation activities would involve construction of a structure (approximately 20x20 feet) made from concrete cinder block or slatted fence; the structure would be constructed in compliance with CBC requirements, as applicable. No impacts would result, and no mitigation is required.

iv) Landslides?

No Impact. Earthquake-induced landsliding often occurs in areas where previous landslides have moved and in areas where the topographic, geologic, geotechnical, and subsurface groundwater conditions are conducive to permanent ground displacements. No slopes are present on or near the site and based on Exhibit 5.7-3, Liquefaction/Landslide Potential, of The Fullerton Plan EIR, the project site is not located in an area subject to seismically induced landslides. Therefore, the potential for landslides on the project site is considered low. No impact would result and no mitigation is required.

b) Result in substantial soil erosion or the loss of topsoil?

Less than Significant Impact. The proposed project site is currently developed and paved with non-porous materials and contains minimal landscaping. The proposed demolition and remediation activities would result in more pervious surfaces than the existing land use, resulting in less surface runoff from the project site. However, during demolition and remediation activities, temporary soil erosion may occur due to rainfall and wind if unprotected soil is exposed. As identified in 4.9, Hydrology and Water Quality, potential impacts related to short-term soil erosion would be less than significant with the implementation of proposed erosion control measures and compliance with applicable water quality regulations, including those outlined in the FMC. Additionally, the project site would not be used for agricultural or other purposes that require topsoil. This impact is less than significant and no mitigation is required.

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

d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1004), creating substantial risks to life or property?

No Impact. The project site is underlain by artificial fill, alluvium and older alluvium and portion of the site materials are anticipated to possess a high expansion potential (Albus-Keefe 2013). As identified above, the project site is not within an area subject to landslides; however, the southern portion of the project site is within an area subject to liquefaction.

As identified in Section 5.7, Geology and Soils, of The Fullerton Plan EIR, subsidence hazards involve either the sudden collapse of the ground to form a depression or the slow subsidence or compaction of the sediments near the Earth's surface. Subsidence can be caused by fluid withdrawal. If fluids (primarily groundwater and petroleum) are withdrawn from below the surface, a decrease in fluid pressure may occur resulting in the removal of support and possible collapse. The proposed project involves remediation of VOC-contaminated groundwater (refer to Exhibit 5, VOC-Contaminated Areas); however, these activities would not involve the extraction of substantial amounts of groundwater that would result in subsidence (also refer to the discussion of Threshold “b” in Section 4.9, Hydrology and Water Quality, of this IS.

While the project site does contain expansive soils and potentially unstable soils, the project does not propose construction of habitable structures or any other activities that would result in on- or off-site landslides, lateral spreading, subsidence, liquefaction or collapse. Additionally, the proposed project would not create a risk to life or property of any kind. No impacts would result, and no mitigation is required

e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?

No Impact. The project does not include the development of either septic tanks or alternative wastewater systems. No related impacts would result, and no mitigation is required.

Mitigation Program

No mitigation measures are required.

4.7 GREENHOUSE GAS EMISSIONS

Relevant elements of the proposed project related to greenhouse gas (GHG) emissions include: (1) demolition of on-site buildings and pavement; (2) the export of approximately 40 cy of PCB-contaminated soil excavated from the project site; and (3) the use of diesel-powered and other construction equipment during demolition and remediation (soil and groundwater). As further discussed in Section 2.5, Truck and Vehicular Circulation, demolition activities would generate approximately 173 round truck trips total (346 one-way trips) over a 3-month period, and remediation activities would generate approximately a total of 2 round truck trips (4 one-way trips). There would also be approximately 25 contractors working at the project site on a peak day and 10 to 12 workers on an average day traveling to the site.

Impact Analysis

Would the project:

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

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

No Impact. As identified in Section 5.21, Greenhouse Gas Emissions, of The Fullerton Plan EIR, projects within the City of Fullerton are subject to the rules and regulations adopted by the U.S. Environmental Protection Agency (USEPA), including the GHG Tailoring Rule; the State of California including the California Air Resources Board (CARB); the South Coast Air Quality Management District (SCAQMD), including adopted and recommended CEQA significance thresholds; the County of Orange; and the goals, policies and actions established in The Fullerton Plan Air Quality and Climate Change Element and Climate Action Plan (CAP). A description of these rules and regulations is provided in The Fullerton Plan EIR and is incorporated in this IS by reference.

Most relevant to the proposed project, The Fullerton Plan CAP provides a framework for reducing GHG emissions and managing resources to best prepare for a changing climate. The CAP recommends GHG emissions targets that are consistent with the reduction targets of the State of California and presents strategies that will make it possible for the City to meet the recommended targets. The CAP also suggests best practices for implementation and makes recommendations for measuring progress.

The Fullerton Plan CAP states the following:

> "One of the primary uses for a CAP is to establish significance thresholds for reviewing projects under CEQA. CEQA requires the City to identify the significant environmental impacts of its discretionary actions and to avoid or mitigate those impacts if feasible. The CEQA Guidelines, as updated pursuant to Senate Bill (SB) 97, acknowledges that climate change is an environmental issue that requires analysis under CEQA and encourages the use of a plan consistency threshold for cumulative impacts on climate change. Projects that demonstrate consistency with the strategies, actions, and emission reduction targets contained in the CAP would have a less than significant impact on climate change.
>
> When the City undertakes a discretionary action, such as approval of a proposed development project, plan, policy, or code change, the City will evaluate whether that action would result in a significant climate change impact."

It is accepted as very unlikely that any individual development project would have GHG emissions of a magnitude to directly impact global climate change; therefore, any impact would be considered on a cumulative basis.

Because the City has a CAP that meets the requirements of CEQA Guidelines Section 15183.5, the determination of whether a project would generate GHG emissions that may have a significant impact on the environment, or conflict with an applicable plan, policy or regulation adopted for the purpose of reducing GHG emissions, is made by determining the consistency of that project with the CAP.

Existing Conditions

GHGs are global pollutants and are therefore unlike criteria air pollutants such as ozone (O_3), particulate matter (PM10 and PM2.5), and toxic air contaminants (TACs), which are pollutants of regional and local concern (see Section 4.3, Air Quality, of this IS). While pollutants with localized air quality effects have relatively short atmospheric lifetimes (generally on the order of a few days), GHGs have relatively long atmospheric lifetimes, ranging from one year to several thousand years. Long atmospheric lifetimes allow for GHGs to disperse around the globe. Therefore, GHG effects are global, as opposed to the local and/or regional air quality effects of criteria air pollutant and TAC emissions.

As identified in The Fullerton Plan EIR, GHGs include CO_2, methane (CH_4), nitrous oxide (N_2O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF_6). GHGs vary widely in the power of their climatic effects; therefore, climate scientists have established a unit called global warming potential (GWP). The GWP of a gas is a measure of both potency and lifespan in the atmosphere as compared to CO_2. Carbon dioxide equivalent (CO_2e) is a quantity that enables all GHG emissions to be considered as a group despite their varying GWP. The GWP of each GHG is multiplied by the prevalence of that gas to produce CO_2e.

As previously described, the project site includes vacant buildings. While there is on-site security, there are no existing operations that generate GHG emissions.

Calculated GHG Emissions

Although the determination of significance is made by determining the consistency of the proposed project with the City's CAP, an estimate of the proposed project's GHG emissions is provided for information.

Demolition is expected to begin in September 2013 and last for approximately 3 months; soil remediation is expected to begin in October 2013 and continue through October 2014. The principal source GHG emissions would be the internal combustion engines of construction equipment, on-road construction vehicles, and workers' commuting vehicles. GHG emissions from demolition activities were obtained from the CalEEMod model described in Section 4.3, Air Quality, of this IS. GHG emissions from proposed demolition activities are estimated at 158 metric tons of carbon dioxide equivalent ($MTCO_2e$). Direct GHG emissions from combustion sources from proposed remediation activities are estimated at 934 $MTCO_2e$ (Yorke 2013). Indirect GHG emissions from electricity consumption during proposed remediation activities are estimated at 720 $MTCO_2e$ (Yorke 2013). Total combined GHG emissions for demolition and remediation activities would therefore be 1,812 $MTCO_2e$. GHG calculation worksheets are provided in Appendix A.

The groundwater remediation activities are expected to follow the soil remediation activities, with minimal or no overlap. The groundwater remediation may involve enhanced in-situ bioremediation (EISB) and/or groundwater extraction and treatment. The EISB process itself may generate CO_2 as a byproduct of the bioremediation; the quantity of CO_2 emitted would be proportional to the mass of VOC in the groundwater. Total CO_2 emissions are expected to be well below 100 pounds per year. Heavy equipment usage and worker commutes associated with EISB are expected to be minimal and GHG emissions from those vehicles would have a less than significant impact. As an alternative to, or in addition to, EISB, groundwater may be pumped from the ground and treated using activated carbon adsorption to remove VOC. Groundwater treatment using activated carbon adsorption is not expected to generate GHG emissions. Heavy equipment usage (e.g., drilling equipment for extraction well installation, or

haul truck traffic for carbon disposal) and worker commutes associated with groundwater extraction and treatment are expected to be minimal and GHG emissions from those vehicles would also be minimal.

There are no established quantitative Federal, State, regional, or local CEQA significance criteria for GHG emissions, except for industrial projects where the SCAQMD is the lead agency. The threshold for those projects is 10,000 $MTCO_2e$ per year and SCAQMD has recommended but not adopted this threshold for use by lead agencies other than SCAQMD. Estimated GHG emissions for the proposed project would be substantially less than suggested and adopted thresholds.

Plan Consistency Analysis

The principal overall State plan and policy adopted for the purpose of reducing GHG emissions is Assembly Bill (AB) 32 (California Global Warming Solutions Act of 2006). AB 32 establishes regulatory, reporting, and market mechanisms to achieve quantifiable reductions in GHG emissions and establishes a cap on statewide GHG emissions. The quantitative goal of AB 32 is to reduce GHG emissions to 1990 levels by 2020. Statewide plans and regulations such as GHG emissions standards for vehicles and the Low Carbon Fuel Standard are being implemented at the statewide level, and compliance at the individual project level is not addressed. Therefore, the project does not conflict with those plans and regulations.

Senate Bill 375, signed in September 2008 (Chapter 728, Statutes of 2008), aligns regional transportation planning efforts, regional GHG reduction targets, and land use and housing allocation. SB 375 requires Metropolitan Planning Organizations (MPOs) to adopt a sustainable communities strategy (SCS) or alternative planning strategy (APS) that will address land use allocation in that MPOs regional transportation plan. SB 375 is being addressed at the State and regional levels, and the principles of SB 375 are incorporated in the adopted SCAG 2012 Regional Transportation Plan (RTP)/SCS. Because the proposed project does not involve any new development, it does not conflict with land use and growth assumptions envisioned by SB 375 and the RTP/SCS.

As identified in the City's CAP, when determining whether a proposed project is consistent with the CAP, the following should be considered:

> ***Step 1***: *Consider the consistency of the discretionary project (magnitude and location of growth) with The Fullerton Plan's year 2030 growth projections, which are the basis of the GHG emissions inventory projects. If the project is consistent with The Fullerton Plan projections, the project is consistent with the CAP.*

The proposed project involves demolition and remediation activities at the former BCI facility; no development is proposed. These activities would be short-term and GHG emissions would be generated by engine exhaust from equipment operating on-site, on-road hauling trucks, vendor vehicle trips, and worker commuting trips.

The proposed project would not result in any growth within the City of Fullerton including an increase in employment or population. Therefore, the proposed project is consistent with The Fullerton Plan's year 2030 growth projections and would be consistent with the CAP resulting in a less than significant impact related to GHG emissions.

The Fullerton CAP describes the four strategies that the City has crafted to achieve the City's GHG reduction target: Transportation and Mobility Strategy, Energy Use and Conservation Strategy, Water Use and Efficiency Strategy, and Solid Waste Reduction and Recycling Strategy. The first three strategies are applicable to new or existing developments and are not applicable to the proposed project which involves demolition and remediation activities. With regard to the fourth strategy, the proposed demolition would create approximately 58,120 tons of solid waste. Approximately 57,949 tons, or 99.7 percent of the solid waste would be recycled. Therefore, the proposed project would be consistent with the CAP strategies.

The proposed project would not generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment, and would not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases. No impact would result and no mitigation is required.

Mitigation Program

No mitigation measures are required.

4.8 HAZARDS AND HAZARDOUS MATERIALS

Relevant elements of the proposed project related to hazards and hazardous materials include: (1) demolition of the existing buildings and paved surfaces, and (2) proposed remediation activities to address volatile organic compounds (VOC) soil and groundwater contamination and polychlorinated biphenols (PCB) soil contamination that exists from previous BCI operations at the project site.

As identified in Section 5.9, Hazards and Hazardous Materials, of The Fullerton Plan EIR, projects within the City of Fullerton are subject to various Federal, State and local rules and regulations related to hazards and hazardous materials. Various agencies have regulatory authority, including but not limited to: the USEPA, US Department of Transportation (USDOT), California Department of Transportation (Caltrans), California Occupational Safety and Health Administration (Cal-OSHA), California EPA's Department of Toxic Substances Control (DTSC), the Orange County Health Care Agency (OCHCA) Environmental Health Division (EHD), California Highway Patrol (CHP), South Coast Air Quality Management District (SCAQMD), Orange County Waste and Recycling, and the City of Fullerton Fire Department. This information is incorporated by reference into this IS, and discussed below, as appropriate.

Most relevant to the proposed project are State regulations. The responsibility for implementation of Resource Conservation and Recovery Act (RCRA)[5] was given to California EPA's Department of Toxic Substances Control (DTSC) in August 1992. The DTSC is also responsible for implementing and enforcing California's own hazardous waste laws, which are known collectively as the Hazardous Waste Control Law. Transportation of hazardous materials/wastes is regulated by California Code of Regulations (CCR) Title 26. The California Highway Patrol (CHP) and Caltrans enforce Federal and State regulations and respond to hazardous materials transportation emergencies. Emergency responses are coordinated as necessary between Federal, State, and local governmental authorities and private persons through a State mandated Emergency Response Plan.

[5] The Resource Conservation and Recovery Act (RCRA) gives EPA the authority to control hazardous waste from "cradle-to-grave". This includes the generation, transportation, treatment, storage, and disposal of hazardous waste.

The Fullerton Plan EIR also briefly describes reported regulatory properties within the City based on a broad scale search of existing data bases. Other factors associated with the disposition of hazardous materials (transportation of hazardous materials/waste, illegal disposal, landfills), and other potential sources of hazardous materials (such as asbestos containing materials and lead-based paints) are described. Site specific conditions are presented in the impact analysis below.

The Fullerton Plan EIR Mitigation Measures

The following mitigation measures (MM) identified in The Fullerton Plan EIR are incorporated as part of the proposed project and assumed in the analysis presented in this section. These MMs will be included in the Mitigation Monitoring and Reporting Program for the proposed project.

MM HAZ-2 Prior to potential remedial excavation and grading activities, impacted areas shall be cleared of all maintenance equipment and materials (e.g., solvents, grease, waste-oil), construction materials, miscellaneous stockpiled debris (e.g., scrap metal, pallets, storage bins, construction parts), above ground storage tanks, surface trash, piping, excess vegetation and other deleterious materials. These materials shall be removed off-site and properly disposed of at an approved disposal facility. Once removed, a visual inspection of the areas beneath the removed materials shall be performed. Any stained soils observed underneath the removed materials shall be sampled. In the event concentrations of materials are detected above regulatory cleanup levels during demolition or construction activities, the project Applicant shall comply with the following measures in accordance with Federal, State, and local requirements:

- Excavation and disposal at a permitted, off-site facility;
- On-site remediation, if necessary; or
- Other measures as deemed appropriate by the City of Fullerton Fire Department.

MM HAZ-3 Prior to structural demolition/renovation activities, should these activities occur, a Certified Environmental Professional shall confirm the presence or absence of ACM's and LBPs. Should ACMs or LBPs be present, demolition materials containing ACMs and/or LBPs shall be removed and disposed of at an appropriate permitted facility.

Impact Analysis

A Draft Phase I Environmental Site Assessment (ESA) was prepared for the project by E2 Environmental Inc. in July 2008; the Draft Phase I ESA is provided in Appendix B. Previous BCI operations qualified the site as a "large quantity generator of hazardous waste. An elementary neutralization system, which was used to treat acidic rinse water from plating operations was operated on site under the facility Part B permit. The Part B Hazardous Water Facility (HWF) Permit was issued in July 2006 with an expiration date of July 2016. The permit was closed by the DTSC on June 25, 2013. Specific activities allowed by this permit are described in the Phase I ESA. Storage of hazardous materials also occurred on the project site, as described in the Phase I ESA.

Environmental investigations at the project site began in 2008 after the BCI decided to discontinue all operations and close the facility. During those investigations VOCs were

discovered in soil gas in the eastern portion of the facility and was reported to the California Department of Toxic Substances Control (DTSC) in a letter dated July 31, 2008. The Phase I ESA identified 37 Areas of Concern (AOCs) on the basis of Recognized Environmental Conditions (RECs)[6] based upon either identified releases of hazardous materials to soil and/or groundwater, or on the potential for a past release based upon historic facility use, storage, or disposal of hazardous materials (E2 2008). AOCs were identified to facilitate the Resource Conservation and Recovery Act (RCRA) Facility Investigation (RFI) process and have been investigated under the oversight of the DTSC. An additional five AOCs (AOC 38 thru AOC 42) were added in the draft sampling and analysis plan (SAP) in 2009 (H+A 2010). The AOCs provided an effective framework for conducting the field investigation for the RFI and are shown on Exhibit 5 in Section 3, Project Description.

Extensive chemical and subsurface data collected at the AOCs as part of the RFI process has delineated the nature and extent of chemicals of concern (COCs). The field investigations as part of the RFI process included extensive soil gas investigations (over 1,100 soil gas locations were sampled at depths ranging 4 to 15 feet), soil matrix sampling (soil samples were collected at more than 100 locations including the 42 AOCs) and groundwater monitor well clusters comprising 60 monitor wells were drilled, constructed and sampled at 15 locations on site. Based on these investigations, areas of VOCs and (PCBs) contamination have been identified and characterized. The results of the characterization have been described in a draft Conceptual Site Model (CSM) that was submitted to the DTSC for review on May 17, 2013 and is provided in Appendix B (H+A 2013b). The CSM provides the basis for the RFI Report and includes detailed information on the distribution of COCs in soil, soil gas, and groundwater for describing site-related impacts and to support the remedial planning process.

Would the project:

a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

No Impact. Hazards to the public or environment or the public through the transport, use, or disposal of hazardous materials are typically associated with operation of non-residential uses, such as the BCI facility that previously operated at the project site. As identified in Section 5.9, Hazards and Hazardous Materials, of The Fullerton Plan EIR, many types of businesses utilize various chemicals and hazardous materials, and their routine business operations involve chemicals that are manufactured, warehoused, or transported. The proposed project does not involve any new development that would result in operational impacts associated with hazardous materials.

As described in Section 2, Project Description, the project involves demolition and remediation of existing on-site soil and groundwater contamination. The transport and disposal of 40 cubic yards of PCB-contaminated soil, asbestos containing materials (ACMs), and building materials with lead-based paint (LBP) would be required. These hazardous materials would be transported in compliance with applicable regulations and disposed of at permitted facilities.

The proposed project is intended to remediate existing conditions that pose a hazard to the public or the environment. No impact would result and no mitigation is required.

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6 The term “Recognized Environmental Conditions” means the presence or likely presence of hazardous substances or petroleum products on a property under conditions that indicate an existing release, a past release, or a material threat of a release of any hazardous substances or petroleum products into structures on the property or into the ground, groundwater, or surface water of the property. The term includes hazardous substances or petroleum products even under conditions in compliance with existing laws.

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

Less Than Significant Impact. Section 5.9, Hazards and Hazardous Materials, of The Fullerton Plan EIR, addresses the potential for human exposure to a hazardous substance through accidental releases during construction and operation. Relevant to the proposed project, this could occur through exposure to ACM and LBP encountered during demolition, and soil and groundwater contamination in unknown contaminated sites during grading and excavation.

ACMs and LBP exist in on-site buildings that would be demolished as part of the proposed project. Soil and groundwater contamination located on the project site has been characterized through previous investigation and is being addressed though the proposed remediation activities; therefore, unknown contamination is not expected to be encountered.

Asbestos-containing Materials and Lead Based Paint

As described in The Fullerton Plan EIR, asbestos is a naturally occurring fibrous material, and is strong, incombustible, and corrosion resistant. Asbestos is commonly found in various manmade products including insulation, ceiling and floor tiles, roof shingles, cement, and automotive brakes and clutches. ACMs that can be crushed into a powder are termed “friable asbestos.” When ACM become friable, there is chance that asbestos fibers can become suspended in air It is under these conditions that airborne asbestos fibers represent the most significant risk to human health.

Lead is a naturally occurring metallic element. Among its numerous uses and sources, lead can be found in paint; water pipes; solder in plumbing systems; soils around buildings; and structures painted with lead-based paint. In 1978, the U.S. Consumer Products Safety Commission banned paint and other surface-coating materials containing lead. Because of its toxic properties, lead is regulated as a hazardous material. Inorganic lead is also regulated as a toxic air contaminant.

Various investigations into the possible presence of ACM and lead-based paint (LBP) at the project site have been completed and are included in Appendix C. In February and March 2013, Patriot Environment Laboratory Services, Inc. (Patriot) conducted asbestos inspections for Buildings 1 (demolition of this building is not part of the proposed project), 2, 3, 4, 5, 6, and 9. To determine the presents of ACMs, physical bulk samples from interior and exterior locations at the site were collected. ACMs were identified in each of these buildings and include, but are not limited to: ceiling and floor tiles, vinyl sheet floor, mastic, countertop transite, gravel roof, baseboards, window putty and sealants, duct work, insulation, HVAC materials, and stucco (Patriot 2013a). In July and September 2008, Health Sciences Associates (HSA) conducted asbestos investigations for Buildings 8 and 10, respectively. ACMs were not identified in Buildings 8 or 10 (HSA 2008a, 2008b).

With exception of Building 1, all buildings on site would be demolished as part of the proposed project, thus disturbing known and potential ACMs. Demolition of the buildings could expose demolition personnel to these materials unless proper precautions are taken to minimize exposure. The potential for asbestos release would be considered a significant impact if not properly handled. Because exposure to such materials can result in adverse health effects in uncontrolled situations, several regulations and guidelines pertaining to abatement of and protection from exposure to asbestos have been developed for demolition activities. As

described in The Fullerton Plan EIR MM Haz-3 and RR HAZ-1, prior to demolition of the on-site structures, ACMs would be removed and disposed of at an appropriate permitted facility by qualified contractors. Adherence to these requirements would reduce potential impacts related to the removal and disposal of ACMs to a level considered less than significant.

In February and March 2013, Patriot performed an LBP survey for Buildings 1, 2, 3, 4, 5, 6 and 9. During a walk-through of the interior and exterior buildings LBP was identified in each of the buildings (Patriot 2013b). In July 2008 HSA performed an LBP survey for Building 8 and LBP was found in various locations (HSA 2008a). Because exposure to lead dust generated during demolition activities could result in adverse health effects in uncontrolled situations (resulting in a potentially significant impact), regulations and guidelines pertaining to abatement of and protection from exposure to lead-containing materials have been developed for demolition activities. All LBP would be demolished utilizing “lead safe” containment and work practices. Any contractor who would disturb any lead-laden surfaces would be notified of the investigation findings and the requirement to comply with the California Occupational Safety and Health Agency (CalOSHA) guidelines. Prior to demolition of the on-site structures, lead-containing materials would be removed and disposed of by qualified contractors. Adherence to RR HAZ-2 would reduce potential impacts associated with the removal and disposal of lead-containing materials to a level considered less than significant.

Chemicals of Concern

As identified in the draft CSM included in Appendix B, chlorinated VOCs are the most significant and wide spread COCs at the project site. In particular, the industrial solvents tetrachloroethene (PCE), trichloroethene (TCE), and trichloroethane are known to have been used historically at the project site. In addition, PCBs have been detected at a few locations. In addition to PCE and TCE, additional VOCs including: 1,1-DCE; 1,2-DCA; Vinyl Chloride; and Carbon Tetrachloride have been detected in soil gas and all but Vinyl Chloride have been detected in soil matrix samples and groundwater. The VOCs have been detected at concentrations that exceed regulatory limits and/or risk-based levels developed through a Health Risk Assessment (HRA) and require remediation. The most wide spread contamination that exceed health risk based levels is in soil gas with lesser areas exceeding regulatory or risk based clean up levels for soil matrix and groundwater.

PCBs and VOCs are regulated under State and Federal laws and require remediation to applicable standards. The PCB impacts are limited in extent and present in shallow soil and will be remediated by excavation and disposal off-site at a licensed TSDF. The VOCs are present in soil, soil gas and groundwater and, as described in Section 2, Project Description, remediation is proposed to include a combination of approaches including soil excavation and on-site treatment by chemical oxidation mixing and/or evaporative desorption. Groundwater remediation would consist of enhanced in-situ bioremediation (EISB), groundwater containment and monitored natural attenuation. The Corrective Measures Study (CMS) that evaluates and recommends applicable remedial technologies requires review and approval by DTSC along with related work plans. In addition to DTSC approval, the following permits and plans are required to comply with applicable regulations and would be obtained for the proposed project.

- SCAQMD Air Permit for the on-site remediation technologies (refer to the discussion provided in Section 2.6, Anticipated Discretionary Approvals).
- Storm Water Pollution Prevention Plan (SWPPP) for managing storm water during both the demolition and remediation work (refer to Section 4.9, Hydrology and Water Quality).

- A SCAQMD Rule 1166 Plan will be in place for handling VOC-impacted soil that will also include elements of the SCAQMD Rule 403 Plan for dust mitigation (refer to the discussion provided in Section 2.6, Anticipated Discretionary Approvals).
- A Soil Management and Vapor Intrusion Mitigation Plan to address the contingency for encountering potential post-remediation COCs (to be submitted to the DTSC).

Compliance with the required regulatory approvals, permits and plans associated with the hazardous material present on-site would ensure that there would be no significant hazardous to the public and environment. This impact is less than significant and no mitigation is required.

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

Less than Significant Impact. Based on review of Exhibit 23, Educational Institutions, of The Fullerton Plan, there are no schools in the City of Fullerton within one-quarter mile of the project site. However, Sonora High School in La Habra is located approximately 0.1 mile northeast of the project site. Superior Avenue, the UPRR tracks and various industrial and commercial uses are located between the school and the project site.

As identified in Section 2, Project Description, and discussed above, the proposed project involves the remediation of contaminated soils and groundwater on the project site, and demolition debris and materials, and PCB-contaminated soils would be hauled from the project site to off-site landfills permitted to receive these materials using haul routes designated by the cities of Fullerton and Brea. These materials would be handled in accordance with applicable regulations and the haul routes would not pass by any school sites, including Sonora High School. Additionally, as discussed under Threshold “d” in Section 4.2, Air Quality, a Health Risk Assessment was conducted for emissions associated with remediation activities and potential impacts were determined to be less than significant. No significant impacts would result during demolition and remediation activities and no mitigation is required.

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

Less Than Significant Impact. As identified above, a Phase I ESA was prepared for the project site in 2008 (E2 2008) and is included in Appendix B. As part of that effort a governments records search was conducted by EDR (February 2008) and included local, State and Federal records for the project site and other sites within the American Society for Testing and Materials (ASTM) standard radii of the facility. The project site appeared in a number of government databases which is not unusual for the type of facility that was previously operated on-site by BCI. The project site was specifically included in the HAZNET, emissions inventory (EMI), and Materials Licensing Tracking System (MLTS) data bases. The HAZNET database tracks data from the copies of hazardous waste manifests received each year by the DTSC; the site is listed in this database for a number of hazardous materials including those listed previously as known to exist on the project site. The EMI database contains emissions inventory data for toxics and pollutant emissions data collected by the California Air Resources Board (CARB) and the local air pollutant agencies such as the SCAQMD. The on-site operations which resulted in the identified emissions were conducted in compliance with SCAQMD rules and regulations. The MLTS is maintained by the Nuclear Regulatory Commission (NRC) and lists sites that store or use radioactive materials subject to the licensing requirements; this is a tracking system and no significance is attached to the listing. Numerous off-site sources of hazardous materials were also identified but do not represent a concern for the proposed

project. A detailed discussion of the results of the records review is provided in the Phase I ESA included in Appendix B.

It should also be noted that a search of local records revealed that there were listings for the project site on file at the Fullerton Fire Department, the Orange County Health Care Agency, and the Orange County Sanitation District. Additionally, BCI records were reviewed. These files include documentation for various items, including, but not limited to: hazardous materials used at the former BCI facility, inspection reports, incident reports, and permits from various agencies that were held for operations, including the DTSC. It should be noted that in June 2013, the DTSC issued a closure certification acknowledgement for hazardous waste storage at the BCI facility. All hazardous waste management units were closed in accordance with the DTSC-approved closure plan (DTSC 2013). The DTSC noted in this closure certification that contamination discovered during the RFI process must be dealt with during the corrective action process (the remediation activities proposed as part of the project).

In summary, based on the information available on hazardous materials database sites, the project site is listed on several government agency databases related to the on-site storage, use, generation, and disposal of hazardous materials; discharge of wastewater; and, air emissions. However, implementation of the proposed demolition and remediation project would not pose hazards to people or the environment related to the identified hazardous materials sites. Conversely, the proposed project involves remediation of the identified on-site soils and groundwater hazardous materials contamination. This impact is less than significant and no mitigation is required.

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?

No Impact. The project site is located approximately 4.25 miles northeast of the Fullerton Municipal Airport and is not within the ALUC-designated Planning Area for the Fullerton Municipal Airport. The Airport Environs Land Use Plan (AELUP) for the Fullerton Municipal Airport was adopted in December 2002 (updated in November 2004) and provides required standards for land uses in the airport vicinity. The AELUP has designated Accident Potential Zones (APZ) and a Runway Protection Zone (RPZ) around the airport to enforce safety standards. According to the AELUP for Fullerton Municipal Airport, the project site is not located within either of these zones (refer to Exhibits 5.9-3 and 5.9-4 of The Fullerton Plan EIR). Further, the project site is not within an imaginary surface area as defined in FAR Part 77.13. The proposed project would not result in a safety hazard for people residing or working in the project area associated with operation of the Fullerton Municipal Airport; no impact would result and no mitigation is required.

f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

No Impact. As described in Section 5.9, Hazards and Hazardous Materials, of The Fullerton Plan EIR, there are no private airstrips located within the City of Fullerton. Therefore, the project would not result in a safety hazard for people residing or working in the project area as a result of operations at a private airstrip.

g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

No Impact. As identified in Section 5.9, Hazards and Hazardous Materials, of The Fullerton Plan EIR, construction activities that involve roadway improvements or extension of activities in to the right-of-way could reduce the number of lanes or temporarily close certain street segments during a typical day-to-day emergency situation. Additionally, the City's Emergency Operations Plan anticipates that all major streets within the City would serve as evacuation routes, and City highways and arterial streets that connect to the Artesia Freeway (State Route 91) and Orange Freeway (State Route 57) would serve as potential evacuation routes, in the event of an extraordinary emergency situation.

The proposed project involves demolition and remediation activities associated with previous BCI operations. Access to the project site for these activities would be from existing driveways along Lambert Road and Harbor Boulevard and the proposed activities would not require lane-closures or otherwise impact operations of adjacent roadways. As further discussed in Section 2.5, Truck and Vehicular Circulation, on a peak day for demolition there would be approximately 10 round truck trips over a 3-month period, and there would be only 2 round truck trips total to haul PCB-contaminated soil during remediation activities. Therefore, the proposed project would neither interfere with nor impact the implementation of the City's existing emergency response or evacuation plans. No impact would occur and mitigation is not required.

h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

No Impact. The project site is located in an urban area of the City of Fullerton and is not adjacent to wildlands or within a designated Fire Hazard Severity area as shown on Exhibit 5.9-1 of The Fullerton Plan EIR. Therefore, implementation of the proposed project would not result in a significant risk of loss, injury, or death involving wildland fires. No mitigation is required.

Mitigation Program

Regulatory Requirements

RR HAZ-1 Demolition shall be conducted in accordance with the remediation and mitigation procedures established by all Federal, State, and local standards including the Federal and State Occupation Safety and Health Administrations (OSHA and CalOSHA) and South Coast Air Quality Management District (SCAQMD) regulations for the excavation, removal, and proper disposal of the asbestos-containing materials (SCAQMD Regulation X – National Emission Standards For Hazardous Air Pollutants, Subpart M – National Emission Standards For Asbestos). The materials shall be disposed of at a certified asbestos landfill. The Asbestos-abatement Contractor shall comply with notification and asbestos-removal procedures outlined in SCAQMD Rule 1403 to reduce asbestos-related health risks. SCAQMD Rule 1403 applies to any demolition or renovation activity and the associated disturbance of asbestos-containing materials. These requirements shall be included on the contractor specifications and verified by the City of Fullerton's Community Development Department in conjunction with the issuance of a Demolition Permit.

RR HAZ-2 Contractors shall comply with the requirements of Title 8 of the *California Code of Regulations* Section 1532.1, which provides for exposure limits, exposure monitoring, respiratory protection, and good working practice by workers exposed to lead. Lead-contaminated debris and other wastes shall be managed and disposed of in accordance with the applicable provision of *the California Health and Safety Code*.

4.9 HYDROLOGY AND WATER QUALITY

Relevant elements of the proposed project related to hydrology and water quality include: (1) an increase in pervious surfaces due the proposed demolition activities which would reduce storm water runoff volumes and flow rates compared to the existing condition; (2) removal of existing storm drains during demolition activities; and (3) use of structural and non-structural BMPs to control stormwater runoff and erosion which could transport chemicals of concern (primarily chlorinated VOCs and PCB).

Section 5.8.2 of The Fullerton Plan EIR provides a discussion of the existing regulatory setting related to hydrology and water quality, including Federal, State and local agencies and regulations. Particularly relevant to the proposed project are the Federal National Pollutant Discharge Elimination System [NPDES] program, and regulations and functions administered by the State Water Resource Control Board (SWRCB) and Regional Water Quality Control Boards (RWQCB). This information is incorporated by reference into this IS, and discussed below, as appropriate.

The Fullerton Plan EIR Mitigation Measure

The following mitigation measure (MM) identified in The Fullerton Plan EIR is incorporated as part of the proposed project and assumed in the analysis presented in this section. This MM will be included in the Mitigation Monitoring and Reporting Program for the proposed project.

MM HYD-1 Prior to issuance of any Grading or Building Permit, and as part of the future development's compliance with the NPDES requirements, a Notice of Intent shall be prepared and submitted to the Santa Ana RWQCB providing notification and intent to comply with the State of California General Construction Permit. Also, a Stormwater Pollution Prevention Plan (SWPPP) shall be reviewed and approved by the Director of Engineering for water quality construction activities on site. A copy of the SWPPP shall be available and implemented at the construction site at all times. The SWPPP shall outline the source control and/or treatment control BMPs to avoid or mitigate runoff pollutants at the construction site to the "maximum extent practicable." All recommendations in the SWPPP shall be implemented during area preparation, grading, and construction. The project applicant shall comply with each of the recommendations detailed in the SWPPP, and other such measure(s) as the City deems necessary to mitigate potential stormwater runoff impacts.

Impact Analysis

Would the project:

a) Violate any water quality standards or waste discharge requirements?

f) Otherwise substantially degrade water quality?

Less Than Significant Impact. The project is subject to requirements of the 1972 Federal Water Pollution Control Act, subsequently known as the Clean Water Act (CWA). In 1972, the CWA was amended to require NPDES permits for the discharge of pollutants to "Waters of the U.S." from any point source. In 1987, the CWA was amended to require that the USEPA establish regulations for municipal and industrial storm water discharges for permitting under the NPDES permit program. The regulations require that municipal separate storm sewer system (MS4) discharges to surface waters be regulated by an NPDES permit. The MS4s are designated or used for collecting or conveying storm water (i.e., not wastewater or combined sewage).

Pursuant to Section 402(p) of the CWA, which requires regulations for permitting of certain storm water discharges, the State Water Resources Control Board (SWRCB) has issued a statewide general NPDES Permit for storm water discharges from construction sites ([NPDES No. CAS000002] Water Quality Order 2009-0009-DWQ (adopted by the SWRCB on September 2, 2009, and effective on July 1, 2010). This order was amended by 2010-0014-DWQ which became effective on February 14, 2011, and 2012-0006-DWQ which became effective on July 17, 2012. The SWRCB NPDES General Permit for Stormwater Discharges Associated with Construction Activity is referred to as the "Construction General Permit".

Under this Construction General Permit, storm water discharges from construction sites with a disturbed area of one or more acres are required to either obtain individual NPDES permits for storm water discharges or to be covered by the Construction General Permit. Coverage under the Construction General Permit is accomplished by completing a construction site risk assessment to determine appropriate coverage level and by preparing a Storm Water Pollution Prevention Plan (SWPPP) that includes site maps, a Construction Site Monitoring Program (CSMP), and sediment basin design calculations. For projects located outside a Phase I or Phase II permit area, the Construction General Permit requires a post-construction water balance calculation for hydromodification controls and completing a Notice of Intent. All of these documents must be electronically submitted to the SWRCB for General Permit coverage. The primary objective of the SWPPP is to ensure that the responsible party properly construct, implement, and maintain BMPs to reduce or eliminate pollutants in storm water discharges and authorized non-storm water discharges from the construction site. The SWPPP also outlines the monitoring and sampling program required for the construction site to verify compliance with discharge Numeric Action Levels (NALs) set by the Construction General Permit.

The City of Fullerton falls within the jurisdiction of the Santa Ana RWQCB (Region 8) and is therefore subject to the General MS4 Permit, Order No. R8-2009-0030; NPDES No. CAS618030, adopted May 22, 2009, as amended by Order No. R8-2010-0062 (amending due dates for WQMP deliverables). As a Co-Permittee under the General MS4 permit, the City of Fullerton has the authority to enforce the terms of the permit for the proposed project. This permit governs storm water and urban runoff discharges to public storm drain systems owned and operated by the northern Orange County cities (collectively "the Co-Permittees"). This permit also specifies requirements for managing runoff water quality from new development and significant redevelopment projects, including specific sizing criteria for treatment BMPs.

The 2003 Drainage Area Management Plan (DAMP) was developed by the Co-Permittees to implement the requirements of the General MS4 Permit. The DAMP provides a framework and a process for following the General MS4 Permit requirements and incorporates watershed protection/storm water quality management principles into the Co-Permittees' General Plan process, environmental review process, and development permit approval process. Among others, the DAMP includes a program to ensure that construction sites implement control practices that address control of construction related pollutants discharges including erosion and sediment control and on-site hazardous materials and waste management (OC Public Works 2003).

In compliance with the NPDES program and the DAMP, the City of Fullerton has adopted a Water Quality Ordinance (*Fullerton Municipal Code*, Chapter 12.18) requiring that all construction projects, development, and significant redevelopment projects incorporate BMPs into a project's design and/or implementation. This is done in an attempt to reduce the amount of pollutants introduced into the storm water drainage system, which connects to local streams, rivers, and eventually the ocean.

Short-Term Water Quality Impacts

The proposed project could result in short-term impacts to surface water quality from demolition and remediation activities. As described in Section 2, Project Description, proposed demolition activities would involve the removal of the existing on-site buildings (with the exception of Building 1 which would be protected in place), and removal of paved surface areas which would expose underlying soils. Storm water runoff from the project site during demolition could contain debris and sediments from these activities. Spills or leaks from heavy equipment and machinery, construction staging areas, or building sites can also enter runoff and typically include petroleum products such as fuel, oil and grease, and heavy metals.

Contamination within the project site consists of VOCs (primarily chlorinated VOCs) and PCBs within the soils, and VOCs in the groundwater. VOC-contaminated soils and groundwater areas are depicted on Exhibit 5, and PCB-contaminated areas are depicted on Exhibit 6. There are two on-site, ex-situ treatment alternatives under consideration for the remediation of VOC-contaminated soils. Regardless of which technology is selected, operation of the on-site, ex-situ treatment system would require the same soil management activities, including the following that are relevant to potential water quality impacts:

- Excavation of the soil that would be treated in the selected equipment. Depending on the extent of contamination at various locations excavation would reach depths up to 15 to 20 feet below the ground surface. Areas of excavation are depicted on Exhibits 5 and 6.
- Stockpiling of soil within or near Building 8 that would be retained as a soil treatment processing center.
- Stockpiling of treated soil until that time that it backfilled on-site.

It is estimated that there would be a maximum of 95,760 cubic yards of VOC-contaminated soil treated on site. PCB-contaminated soils would be excavated, trucked to a permitted TSDF, and landfilled.

As discussed above and required by The Fullerton Plan EIR MM HYD-1, on-site demolition and remediation activities would be required to comply with applicable regulations, including the NPDES Construction General Permit. Development and implementation of a SWPPP would prevent sediment, waste and chemicals of concern from exiting the project site. Following is a

description of the anticipated BMPs that would be implemented during demolition and remediation activities.

Demolition Activities

No grading or site excavation is associated with the proposed demolition activities. To minimize potential impacts associated with storm water runoff during and following completion of demolition, erosion control measures would be installed on site. Each pollutant and its source may require one or more BMPs. Some BMPs may be implemented for multiple pollutants and their sources, while other BMPs would be implemented for a very specific pollutant and its source. Structural and non-structural may include, but not be limited to:

- ***Non-Structural BMPs*.** Non-structural BMPs generally consist of processes, prohibitions, procedures, schedule of activities, etc., which prevent pollutants associated with industrial activity from contacting with storm water discharges and authorized non-storm water discharges. They are considered low technology, cost-effective measures.
    - **Practice Good Housekeeping:** Perform activities in a manner keeping potential pollutants from either draining or being transported off site by managing pollutant sources and modifying construction activities. Keep all potential pollutants isolated from contact with rainwater by storing them in covered structures (container sheds, temporary structures, cover with plastic, etc.).
    - **Contain Waste:** Dispose of all waste in designated areas and keep storm water from flowing on or off of these areas.
    - **Notification of Spills and Spill Response:** Spills of any size must be directly communicated to the Project Manager for proper reporting and emergency response. Spills of any size or volume will be cleaned up immediately to minimize the potential for pollutants to be transported, infiltrate into soil, or drain to surface waters.
    - **Preventative Maintenance:** Machinery, vehicles, and storm water conveyance systems should be inspected and maintained on a routine basis to minimize the possibility of contamination of storm water runoff.
    - **Material Handling and Storage** This includes all procedures to minimize the potential for spills and leaks and to minimize exposure of significant materials to storm water and authorized non-storm water discharges.
    - **Employee Training** This includes training of personnel who are responsible for (1) implementing activities identified in the SWPPP, (2) conducting inspections, sampling, and visual observations, and (3) managing storm water. Training should address topics such as spill response, good housekeeping, material handling procedures, and actions necessary to implement all BMPs identified in the SWPPP.
    - **Erosion Control and Site Stabilization:** This includes a description of all sediment and erosion control activities. This may include the planting and maintenance of vegetation, diversion of run-on and runoff, placement of sandbags, silt screens, or other sediment control devices, etc.

- ***Structural BMPs.*** Where non-structural BMPs are not effective, structural BMPs are considered. Structural BMPs generally consist of structural devices that reduce or prevent pollutants in storm water discharges and authorized non-storm water discharges.
    - **Straw Wattles:** Used to intercept sheet flow from flatter areas to reduce the flow, allowing sediment to settle out.
    - **Overhead Coverage:** This includes structures that provide horizontal coverage of materials, chemicals, and pollutant sources from contact with storm water and authorized non-storm water discharges.
    - **Control Devices:** Devices used to channel or route run-on and run-off away from pollutant sources
    - **Secondary Containment Structures**: This generally includes containment structures around storage tanks, materials, chemicals, and other areas for the purpose of collecting any leaks or spills that can potentially contaminate storm water runoff.
    - **Check Dams:** Installation of gravel bag velocity reducers at several locations.
    - **Drainage Inlet Protection Device:** Installation of drainage inlet protection devices will provide added protection from pollutants entering storm drains.
    - **Silt Fence:** Installation of silt fence and screen curtain as needed for wind erosion and for retaining storm water runoff and allowing sediment to settle out.
    - **Sand/Gravel Bags:** Installation of sand/gravel bags to direct water from building slab to appropriate locations.

Remediation Activities

Selection of BMPs would be based on the identification of potential erosion, pollutants, and pollutant sources. The BMPs would be placed to both prevent erosion and to capture sediment and other pollutants from migrating off-site. In areas where remedial excavations are being performed and contaminated soil is being excavated and stockpiled, additional BMPs would be implemented to specifically mitigate the potential for the storm water runoff to become impacted by the contaminated soils. BMPs designated specifically for the contaminated materials may include the following:

- **Storm Water Diversion:** Devices such as gravel or sand bags can be used to channel or route run-on away from stockpiled materials or open excavations. The devices may also be used to construct berms around stockpiles to prevent runoff from leaving the area.
- **Drainage Inlet Protection Device:** Installation of drainage inlet protection devices (sand bags, hay bales, straw wattles, and silt fences) would provide added protection from pollutants entering storm drains;
- **Plastic Sheeting:** Plastic sheeting would be used to cover contaminated soil stockpiles to prevent storm water from coming in contact with contaminated soils and potentially polluting the storm water run-off. Plastic sheeting would also be used to line open excavations or other contaminated areas subjected to storm water.
- **Active Treatment System:** In the event storm water has accumulated within an open excavation a treatment system may be used to pump and treat storm water from the

prior to discharge. Effluent storm water must be sampled and tested prior to discharge. Dischargers choosing to employ an active treatment system must comply with all of the requirements in Attachment F of the California General Permit, Order No. 2009-0009-DWQ.

- **Containment of Stormwater:** Water collected from contaminated soil stockpile areas may be contained and removed via vacuum truck for disposal. Water removed in this manner must be characterized for disposal.
- **Contaminated Soil Stockpiles Placement:** Avoid stockpiling in or near storm drains or watercourses.

Compliance with the applicable regulatory requirements, including but not limited to the NPDES Construction General Permit (refer to The Fullerton Plan EIR MM HYD-1), and FMC as discussed above, and the preparation and implementation of a SWPPP would ensure that any impacts to downstream waters resulting from demolition and remediation activities associated with the project site would be less than significant. Compliance with applicable local, State, and Federal regulations would reduce water quality impacts associated with construction to a less than significant level.

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

Less than Significant Impact. The project site is situated within the La Habra Groundwater Basin, which occupies the northwestern part of Orange County within an area north of the Orange County Basin, within the cities of La Habra and Brea. Groundwater flows out of the La Habra Basin in two locations: (1) southerly into the Orange County Groundwater Basin along the Brea Creek drainage between the East and West Coyote Hills and (2) westerly into the Central Basin in Los Angeles County. Annual outflow from the La Habra Basin to the main part of the Orange County Groundwater Basin is estimated at approximately 3,000 acre-feet (H+A 2013a).

Groundwater may be encountered during proposed soil and groundwater remediation activities at the project site. Depths to groundwater range from approximately 11 feet to 20 feet below the ground surface (bgs) at the project site and soil excavation for ex-situ treatment may extend to groundwater (excavation would be at depths up to 20 feet bgs). In these instances in-situ treatment of soils would occur near the water table or slightly below the water table to aid in groundwater treatment. Groundwater remediation alternatives potentially include in-situ oxidation, groundwater pump and treat for on-site containment and monitored natural attenuation. If groundwater pump and treat methods are used to contain the contaminant plumes on site, the volumes of groundwater removed would be small due to the low average hydraulic conductivity. These small volumes of groundwater would be treated and re-injected into the groundwater system to aid in hydraulic control of the plume and would not result in a net withdrawal from the aquifer system. Therefore, the proposed project would not deplete groundwater supplies. This impact is less than significant and no mitigation is required.

Additionally, the project site is largely impervious under its existing condition and is not a designated groundwater recharge area; therefore, the proposed project would not interfere substantially with groundwater recharge.

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

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

No Impact. The project site is currently developed and there are no streams or rivers within or in proximity to the project site. Surface drainage across the project site is generally towards the southwest corner of the property. Stormwater is discharged from the project site at various locations and the majority flows via sheet flow to an open concrete channel to the east and south of the project site. Stormwater also flows to the adjacent streets, Lambert Road and Harbor Boulevard.

Following completion of the proposed demolition and remediation activities, the project site would have more exposed soils/pervious surface which could potentially alter or reduce the amount and rate of runoff. The proposed project would not increase the amount of stormwater runoff from the project site and would not result in flooding on or off site.

The proposed project would not substantially alter existing drainage patterns or change the course of any streams or rivers. No significant impacts would result and no mitigation is required.

e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

No Impact. The proposed demolition activities would involve removal of existing on-site storm drains and does not include any development or other uses that would require the construction of new storm water drainage facilities. Additionally, as identified above, the amount of runoff from the project site would not increase since the amount of impervious surface would be reduced compared to the current conditions. The project would not require the expansion of existing facilities. No significant environmental impacts would occur and no mitigation is required.

g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?

h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?

i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?

j) Inundation by seiche, tsunami, or mudflow?

No Impact. As identified on Exhibit 5.8-1, FEMA Flood Zones, of The Fullerton Plan EIR, the project site is not located in an area identified as a 100-year flood hazard area, and would not expose people or structures to flooding. There are no water bodies in proximity to the project site that would subject the site to hazards from a seiche or tsunami. There are no hillside areas within the project vicinity that would generate mudflow. Additionally, the project does not propose construction of any habitable structures and would not expose people or structures to a

significant risk of loss, injury, or death involving flooding. As a result, no impacts would occur and no mitigation is required.

Mitigation Program

No mitigation measures are required.

4.10 LAND USE AND PLANNING

Relevant elements of the proposed project related to land use include removal of the existing on-site buildings with the exception of the Administration Building (Building 1) which is identified as a "Potential/Possible Significant Property" in The Fullerton Plan (refer to additional discussion provided in Section 4.5, Cultural Resources). The proposed project does not involve any new development and does not require a General Plan amendment or zone change.

Impact Analysis

Would the project:

a) Physically divide an established community?

No Impact. As shown in the aerial photograph provided in Exhibit 3, the project site is currently developed with industrial uses, paved parking areas, and landscaping. The project site is surrounded by development including industrial, commercial/retail, and office uses. There are distribution facilities to the west, commercial uses to the north, office and industrial uses to the east (across the UPRR tracks) and storage, office and commercial uses to the south. The proposed project involves the demolition of existing buildings on site and remediation activities that would not disrupt the physical arrangement of an established community. No impact would occur and no mitigation is required.

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

No Impact. Section 5.1.2 of The Fullerton Plan EIR includes a discussion of the "Existing Regulatory Setting" for Land Use and Planning including regional programs administered by the Southern California Association of Governments (SCAG), South Coast Air Quality Management District (SCAQMD), and the Orange County Airport Land Use Commission. This information is incorporated by reference in this IS.

With respect to regional planning, SCAG is the Metropolitan Planning Organization (MPO) for six counties: Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial. As the designation MPO, the Federal government mandates SCAG to research and draw up plans for transportation, growth management, hazardous waste management, and air quality. Additionally, SCAG reviews EIRs for projects of regional significance for consistency with regional plans. The proposed project would not be considered regionally significant for SCAG's purposes. The SCAQMD Air Quality Management Plan is discussed in Section 4.2, Air Quality of this IS, and the Airport Environs Land Use Plan for Fullerton Municipal Airport is discussed in Section 4.8, Hazards and Hazardous Materials.

The current General Plan's land use designation for the project site is Industrial and the zoning designation is M-G (Manufacturing, General) and M-P 200 (Manufacturing Park). The proposed project involves the demolition of the existing buildings and remediation activities and would not require a change to the land use or zoning designations for the site. However, consistency of the proposed project with the goals of The Fullerton Plan is addressed below.

The Fullerton General Plan (The Fullerton Plan) was adopted on May 1, 2012 and is organized into four Master Elements: (1) The Fullerton Built Environment; (2) The Fullerton Economy; (3) The Fullerton Community; and (4) The Fullerton Natural Environment. Each Chapter, or Element, within the four Master Elements addresses a particular topic and contains at least one goal and multiple policies.

During preparation of The Fullerton Plan, the Fullerton community identified twelve geographic focus areas in the City within which to concentrate potential change through community-led planning processes (refer to Exhibit 1, Focus Areas, of The Fullerton Plan). The focus area approach reinforces a commitment to community-based planning and to the need to thoughtfully align change with the general character and form, as well as opportunities, desired by the community for each area. The project site is within Focus Area H: North Industrial. The North Industrial Focus Area is located along Harbor Boulevard and Imperial Highway and serves as the northernmost gateway to the City. The North Industrial Focus Area has historically been characterized by large manufacturing/distribution facilities with some commercial retail uses fronting Imperial Highway. The North Industrial Focus Area is envisioned as a northern gateway to the City and primary employment generating area which seizes opportunities to introduce new compatible and supporting uses. The North Industrial area will connect to the City's Downtown as well as the surrounding cities of Brea and La Habra (Fullerton 2012a). While the proposed project does not involve any new development, the proposed remediation activities are required to ensure that existing soil and groundwater contamination is remediated to the applicable standards established by the California Department of Toxic Substances Control (DTSC) which would allow for future development as envisioned by The Fullerton Plan.

The proposed project does not involve any future development of the site, and most of the goals and policies outlined in The Fullerton Plan are not applicable to the proposed demolition and remediation activities. However, the proposed project does not conflict with any of The Fullerton Plan goals and is consistent with the following goals, which are applicable.

<u>The Fullerton Built Environment</u>

- **Goal 4: Valued and Preserved Historic Resources**. As described in Section 4.5, Cultural Resources, Building 1, the Administration Building at the Beckman Coulter complex, has been identified as a "Potential/Possible Significant Property" in The Fullerton Plan EIR. Based on further review, it has been determined that the Administration Building is eligible to be a Local Landmark in the City of Fullerton and could potentially be eligible for listing in the NRHP or CRHR. Therefore, the proposed project does not involve demolition of this building, consistent with this goal.

<u>The Fullerton Natural Environment</u>

- **Goal 20: A healthy watershed and clean urban runoff**. As discussed in Section 2.2, Project Background, of this IS, previous operations at the BCI facility have resulted in contamination of the underlying groundwater with chlorinated VOC (refer to Exhibit 5, VOC-Contaminated Areas). A component of the proposed project is groundwater remediation which is described in Section 2.4.2, Remediation Activities. Additionally, as

discussed in Section 4.9, Hydrology and Water Quality, structural and non-structural BMPs would be implemented during the demolition and remediation activities to ensure that soil erosion and chemicals of concern do not enter the storm water runoff. The proposed project is consistent with this goal.

- **Goal 23: Safe and efficient management of waste**. As discussed in Section 4.17, Utilities and Service Systems, the proposed demolition would create approximately 58,120 tons of solid waste. Approximately 57,949 tons or 99.7 percent of the solid waste would be recycled with a limited amount of solid waste entering a landfill. Additionally, the VOC-contaminated soils would be treated on-site and would not require disposal at a landfill facility. PCB-contaminated soils (approximately 40 cubic yards) would require off-site disposal and would be hauled to permitted treatment, storage and disposal facility (TSDF). The proposed project is consistent with this goal.

It should also be noted that the hazardous materials on site which are subject to the proposed remediation activities would be handled and transported, if applicable, in accordance with all applicable state and local regulations, as further discussed in Section 4.8, Hazards and Hazardous Materials.

The proposed project would not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project. No impacts would result and no mitigation is required.

c) Conflict with any applicable habitat conservation plan or natural community conservation plan?

No Impact. As discussed previously in Section 4.4, Biological Resources (Threshold "f"), the proposed project is not within the boundaries of an adopted habitat conservation plan or natural community conservation plan. There would be no impact and no mitigation is required.

Mitigation Program

No mitigation measures are required.

4.11 MINERAL RESOURCES

There are no relevant elements of the proposed project related to mineral resources.

Impact Analysis

Would the project:

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

b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

No Impact. As identified in Section 9, Effects Found Not to be Significant, of The Fullerton Plan EIR, according to the State of California Department of Conservation, California Geologic Survey – SMARA Mineral Land Classification, Aggregate Availability in California (December 2006), commercially productive mineral resources do not occur within the City of Fullerton. Additionally, The Fullerton Plan does not identify any known State or locally designated mineral

resources or locally important mineral resource recovery sites within the City. Implementation of the proposed project would not result in adverse impacts to any significant mineral resources. No mitigation is required.

Mitigation Program

No mitigation measures are required.

4.12 NOISE

Relevant elements of the proposed project related to noise and vibration include (1) the use of diesel-powered and other heavy equipment during demolition and remediation activities and transport of this equipment to the project site; (2) the potential for remediation activities in the nighttime hours; (3) hauling of demolition materials to off-site locations with a maximum truck volume of 10 round trips (20 one-way trips) per day;(4) hauling of limited PCB-contaminated soils (total of 2 round trips); and, (4) transport of a maximum of 25 workers to the project site (personal vehicles).

Section 5.6, Noise, of The Fullerton Plan EIR includes information regarding the existing regulatory setting for noise including applicable Federal, State and local agencies. The effects of noise on the community, existing noise levels in the City, and noise sources are also described. This information remains applicable and is incorporated by reference into this IS.

The Fullerton Plan EIR Mitigation Measures

The following mitigation measures (MM) identified in The Fullerton Plan EIR are incorporated as part of the proposed project and assumed in the analysis presented in this section. These MMs will be included in the Mitigation Monitoring and Reporting Program for the proposed project.

MM N-2 Project applicants shall require by contract specifications that heavily loaded trucks used during construction would be routed away from residential streets to the extent feasible. Contract specifications shall be included in construction documents, which shall be reviewed by the City prior to issuance of a grading permit.

MM N-4 The City shall require future developments to implement the following measures to reduce the potential for architectural/structural damage resulting from elevated groundborne noise and vibration levels:

- Pile driving within a 50-foot radius of historic structures shall utilize alternative installation methods where possible (e.g., pile cushioning, jetting, predrilling, cast-in-place systems, resonance-free vibratory pile drivers).
- The preexisting condition of all designated historic buildings within a 50-foot radius of proposed construction activities shall be evaluated during a preconstruction survey. The preconstruction survey shall determine conditions that exist before construction begins for use in evaluating damage caused by construction activities. Fixtures and finishes within a 50-foot radius of construction activities susceptible to damage shall be documented (photographically and in writing) prior to construction. All damage shall be repaired back to its preexisting condition.

- Vibration monitoring shall be conducted prior to and during pile driving operations occurring within 100 feet of the historic structures. Every attempt shall be made to limit construction-generated vibration levels in accordance with Caltrans recommendations during pile driving and impact activities in the vicinity of the historic structures.[7]

Impact Analysis

Would the project result in:

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

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

Less Than Significant Impact with Mitigation Incorporated. The existing noise environment at the project site is dominated by traffic on Lambert Road to the north, traffic on Harbor Boulevard to the west (Davy 2012). Peak hour average noise levels (L_{eq}) measured in October 2012 were 71 dBA L_{eq} at the north and west property lines and 56 dBA L_{eq} at the east property line.

The City of Fullerton Noise Ordinance defined a noise-sensitive land use as any private or public school, hospital, residential care facility for the elderly, and religious institution. The nearest noise-sensitive land uses to the project site are 600 feet or more north and northeast of the project site, north of the UPRR rail line and Superior Avenue in La Habra, and include residences, Sonora High School, and the Vineyard Community Church. Land uses adjacent to the project site include distribution facilities to the west, commercial uses to the north, office and industrial uses to the east (across the UPRR tracks) and storage, office and commercial uses to the south.

The City of Fullerton Noise Ordinance (Chapter 15.90 of the Municipal Code) and the City of La Habra Noise Ordinance (Chapter 9.32 of the Municipal Code) both include the following noise standards applicable to impacts on residential land uses: interior noise levels are not to exceed 55 A-weighted decibels (dBA) from 7:00 AM to 10:00 PM, and 45 dBA from 10:00 PM to 7:00 AM. Exterior noise levels are not to exceed 55 dBA from 7:00 AM to 10:00 PM, and 50 dBA from 10:00 PM to 7:00 AM. Both Noise Ordinances specifically exclude noise associated with construction, repair, remodeling, or grading of any real property provided it takes place between the hours of 7:00 AM and 8:00 PM on any day except Sunday or a City-recognized holiday.

Demolition activities associated with the proposed project are planned to begin in September 2013 and are expected to occur over an approximate three month period. Demolition activities would occur within the hours specified by the Fullerton Noise Ordinance (RR NSE-1). It is estimated that a total of approximately 3,120 tons of steel, drywall, wood and other debris would be exported off site. Approximately 40,000 tons of concrete would be crushed on site and retained for subsequent local use. Approximately 15,000 tons of asphalt would be pulverized on site and retained for subsequent local use. During the demolition activity, trucks are expected to enter and leave the site on a regular basis, but only during working hours. The number of truck trips traveling along the designated haul routes would vary

[7] Pile driving would not be used for proposed demolition and remediation activities; therefore, the 1st and 3rd bulleted items are not applicable to the proposed project.

daily depending on the nature of the activity. Demolition debris removal from the site would generate an estimated 10 round trips (20 one-way trips) on a peak day, and removal of PCB-contaminated soils would generate a total of 2 round truck trips (4 one-way trips). There would also be approximately 25 contractors working at the project site on a peak day and 10 to 12 workers on an average day.

During demolition activities which would generate the largest number of truck trips on peak day, trucks would follow haul routes designated by the cities of Fullerton and Brea and avoid residential streets (refer to The Fullerton Plan EIR MM N-2). Trucks and contractors are anticipated to access the project site primarily via Lambert Road, Harbor Boulevard, and Imperial Highway. These roads have high volumes of vehicle and truck traffic, more than 32,000 trips per day (Fullerton 2012e). A doubling of traffic volumes would increase traffic noise levels by 3 dBA, which would be barely perceptible. The noise increase associated with 20 one-way trucks trips per day, and contractor vehicles would be negligible.

During demolition of the existing structures, the immediate vicinity would experience short-term noise impacts related to the operation of heavy construction equipment such as dump trucks. Noise levels would fluctuate depending on equipment type, duration of use, and distance between noise source and listener. The operation of heavy equipment may occur as close as 600 feet to the homes to the north of the site across Superior Avenue. Noise from localized point sources, such as construction equipment, decreases by approximately 6 dBA with each doubling of distance from the source to receptor. The loudest noise would be from heavy construction equipment, such as excavators and dump trucks that can reach maximum noise levels (L_{max}) of up to 85 dBA at 50 feet. Assuming the simultaneous operation of an excavator and a truck at the northern edge of the project site, and no intervening noise barriers, the combined intermittent noise level at the nearest sensitive noise receptor may reach levels of up to 66 dBA L_{max}. Noise would be further reduced by the buildings north of Lambert Road.

Most of the demolition and remediation work would occur south of the northern edge of the project site. Soil remediation is expected to begin in October 2013 after completion of some demolition, and remediation would continue through 2014. Assuming concurrent demolition and remediation (which would occur for approximately 2 months or less) with four pieces of heavy equipment operating with the average distance being 1,400 feet from the center of the site to the nearest sensitive receptors and no reduction for intervening buildings, the average demolition noise level at the receptors would be less than 57 dBA L_{eq}. Demolition/remediation equipment noise may be noticeable at the sensitive receptors, or the noise may be masked by traffic noise on Lambert Road, Harbor Boulevard, and Superior Avenue. The noise increase would not be substantial and would be less than significant.

Upon completion of demolition, remediation is expected to continue through October 2014. It is anticipated that normal remediation operations would occur for approximately 12 hours per day between the hours of 7:00 AM and 8:00 PM. However, there may be occasions when there is an operational requirement to operate up to 20 hours per day. The remediation equipment would be housed in Building 8 and would not be a notable noise source. If remediation occurs before 7:00 AM or after 8:00 PM, typically, one piece of equipment, such as a loader, would be required to operate outside to transport soil to or from the remediation process equipment. The noise level at the nearest sensitive receptor from one loader at a distance of 1,000 feet or more would be less than 50 dBA L_{eq}, which is the exterior noise limit prescribed in the Fullerton and La Habra noise ordinances for the hours of 10:00 PM to 7:00 AM. If more than one piece of equipment was operated, there would be a potential to exceed the 50 dBA L_{eq} noise limit. Mitigation measure (MM) NSE-1 would be included in the project to ensure that only one piece

of construction equipment would be operated outdoors if remediation operations occur between 10:00 PM and 7:00 AM.

With the implementation of MM NSE-1, exposure of persons to or generation of noise in excess of standards would be less than significant (Threshold "a"). Temporary increases of noise levels would not be substantial and would be less than significant (Threshold "d").

b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

Less Than Significant Impact. The nearest structures are the commercial buildings approximately 100 to 150 feet north and east of the project site. Demolition and remediation activities may result in varying degrees of ground vibration depending on the equipment and methods used, distance to the affected structures, and the soil type. Demolition of existing structures would not utilize explosives. Occasionally, large bulldozers and loaded trucks can cause perceptible vibration levels at distances on the order of 25 feet. As described in Section 2, Project Description, the Demolition Plan includes a buffer around the Administration Building to ensure no structural impacts occur to this building which is a historic resources (refer to discussion provided in Section 4.5, Cultural Resources). As required by The Fullerton Plan EIR MM N-4, the condition of the Administration Building before and after construction would be evaluated and any damage would be repaired back to its preexisting condition. Due to distance of demolition and remediation activities to the nearest structures, and protection of the Administration Building which is incorporated into the proposed project, vibration impacts to land uses near the project site during demolition and remediation would be less than significant and no mitigation is required.

c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?

No Impact. Upon completion of the proposed demolition and remediation activities, there would not be any long-term noise impacts from the project site to the surrounding area. No significant long-term impacts would result and no mitigation is required.

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

No Impact. The project site is located approximately 4.25 miles northeast of the Fullerton Municipal Airport. The project is not located within an airport land use plan or within two miles of a public airport. In addition, the project site is not in the vicinity of a private airstrip; therefore, no noise impacts related to public airports or private airstrip operations would occur.

Mitigation Program

Regulatory Requirements

RR NSE-1 Consistent with City of Fullerton Noise Ordinance, noise-generating project demolition activities shall be limited to between the hours of 7:00 AM and 8:00 PM except on Sunday or a City-recognized holiday. The City Building Official shall be responsible for ensuring that the contractor complies with these requirements.

Mitigation Measure

MM NSE-1 If remediation activities occur between the hours 10:00 and 7:00 AM on a weekday, or on a Sunday or a City-recognized holiday, operation of diesel powered construction equipment outdoors shall be limited to one piece of equipment at one time, such as a loader or backhoe. The maximum noise level of the equipment shall not exceed 80 dBA at a distance of 50 feet. This requirement shall be stated in the project specifications. The City Building Official shall be responsible for ensuring that the contractor complies with these requirements during remediation.

4.13 POPULATION AND HOUSING

There are no relevant elements of the proposed project related to population and housing; the proposed demolition and remediation activities would not directly or indirectly generate an increase in population.

Impact Analysis

Would the project:

a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

No Impact. The project site is fully developed with industrial buildings that have been vacant for several years. The proposed project would result in the demolition of these buildings, with the exception of the Administration Building, and would involve remediation activities. No new development is proposed. Therefore, the proposed project would not generate new population growth. In addition, no infrastructure expansion would be required that could indirectly induce population growth in the area. No significant impacts are anticipated and no mitigation measures are required.

b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?

c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

No Impact. The proposed project would result in the demolition of industrial buildings and paved surface area and remediation activities. The proposed project would not displace existing housing or people and would not require the construction of replacement housing elsewhere.

The proposed project would not result in any impacts related to Population and Housing and no mitigation is required.

Mitigation Program

No mitigation measures are required.

4.14 PUBLIC SERVICES

There are no relevant elements of the proposed project related to public services.

Impact Analysis

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

- ***i) Fire protection?***
- ***ii) Police protection?***
- ***iii) Schools?***
- ***iv) Parks?***
- ***v) Other public facilities?***

No Impact. The proposed project involves demolition and remediation activities and would not directly or indirectly generate an increase in population. No new demand for public services such as schools, fire protection, public safety, libraries, or other services would occur. No impact would occur.

Mitigation Program

No mitigation measures are required.

4.15 RECREATION

There are no relevant elements of the proposed project related to recreation.

Impact Analysis

a) Would the proposed project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

b) Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?

No Impact. The proposed project involves demolition and remediation activities and would not directly or indirectly generate an increase in population. Therefore, the proposed project would

not increase the use of, or require the construction or expansion of, City parks or recreational facilities. No impacts to recreation would occur.

Mitigation Program

No mitigation measures are required.

4.16 TRANSPORTATION/TRAFFIC

Relevant elements of the proposed project related to transportation/traffic include the generation of truck trips to haul demolition debris and contaminated soils off site.

Impact Analysis

Would the project:

a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system. Including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

Less Than Significant Impact. Implementation of the proposed project would generate temporary trips associated with demolition and remediation activities. Demolition activities associated with the proposed project are expected to occur over a three month period beginning in September 2013 and remediation activities would occur at varying levels between October 2013 and October 2014.

Demolition debris removal from the site would generate an estimated 173 round truck trips (346 one-way trips). The number of truck trips traveling along the haul routes designated by the cities of Fullerton and Brea would vary daily depending on the nature of the activity; however, it is estimated that there would be a maximum of 10 round truck trips (20 one-way trips) per work day during the demolition period. During remediation activities it is estimated that there would be a total of 2 round truck trips (4 one-way trips) for removal of PCB-contaminated soil. It is estimated that there would a maximum of 25 contractors/construction workers at the project site on a peak day; however, on an average day there would be up to 12 workers traveling to the site.

Truck trips associated with the proposed project would access the project site from truck routes identified on Exhibit 7, Truck Routes, in The Fullerton Plan, and as identified in the City of Brea Municipal Code. Specifically, trucks would use Harbor Boulevard to access Lambert Road and Imperial Highway and would travel on these roadways to State Route 57, avoiding residential streets. To minimize truck traffic impacts on noise-sensitive uses, the City of Brea has developed a truck route plan that directs truck traffic to designated arterials. As identified in Section 10.40, Truck Routes and Terminals, of the City of Brea Municipal Code, Imperial Highway within the City limits and Lambert Road from the west City limit to Berry Street is a designated truck route for vehicles exceeding a maximum gross weight of 6,000 pounds during all hours of the day. Lambert Road from Berry Street to SR-57 is a designated truck route for use by vehicles exceeding a maximum gross weight of 6,000 pounds from 6:00 AM to 8:00 PM. Because trucks to and from the site likely would weigh more than 6,000 pounds, this segment of Lambert Road would not be used outside the allowed hours.

Due to the small amount of project-related traffic (maximum of 20-one way truck trips per day during demolition on a peak day, a total of 4 one-way truck trips for disposal of PCB-contaminated soil, and a maximum of 25 workers traveling to the site on a peak day), the short-term nature of the demolition component of the proposed project (up to 3 months), and compliance with requirements to follow approved truck routes, the temporary increase in traffic would not significantly impact roadway and intersection operations.

The proposed project would not result in any long-term impacts, as the site would remain vacant and undeveloped under the proposed project. Additionally, the proposed project does not involve any activities that would conflict with non-vehicular modes of transportation.

This impact is less than significant and no mitigation is required.

b) Conflict with an applicable congestion management program, including, but not limited to, level of service standards and travel demand established by the county congestion management agency for designated roads or highways?

No Impact. As identified in Section 5.4, Traffic and Circulation, of The Fullerton Plan EIR, the Orange County Congestion Management Program (CMP) was established in 1991, to reduce traffic congestion and to provide a mechanism for coordinating land use and development decisions. Compliance with CMP requirements ensures a city's eligibility to compete for State gas tax funds for local transportation projects. As identified on Exhibit 8, CMP Highway System, of The Fullerton Plan, Harbor Boulevard and Imperial Highway are included in the CMP Highway System. Because the proposed demolition and remediation project would contribute a small amount of project-generated traffic, it would not conflict with applicable congestion management plans, ordinances, or policies related to the circulation system. There would be no impact and no mitigation is required.

c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that result in substantial safety risks?

No Impact. The proposed project would involve removal of existing buildings and remediation of existing soils and groundwater contamination and would not include the development of any new uses. There would be no change in air traffic patterns, and the project would not increase the amount of air traffic. There would be no impact and no mitigation is required.

d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses?

No Impact. The proposed project involves demolition and remediation activities within the project site and existing circulation patterns on adjacent roadways would not be altered. The project does not include any uses or design features that would increase hazards. The proposed project would not interfere with access or activities at the surrounding land uses. There would be no impact and no mitigation is required.

e) Result in inadequate emergency access?

No Impact. The proposed project involves demolition and remediation activities within the project site and existing points of ingress and egress would remain accessible to emergency vehicles. There would be no impact related to emergency access and no mitigation is required.

f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decreased the performance or safety of such facilities?

No Impact. The proposed project involves demolition and remediation activities within the project site; no development is proposed as part of the proposed project. In the vicinity of the project site there are existing sidewalks along the western side of Harbor Boulevard and both sides of Lambert Road. Exhibit 5.4-5, Proposed Bikeway Improvements, identifies a proposed Class I (off-street) Bike Path following the alignment of the UPRR adjacent to the project site. There are currently no plans to implement this bikeway. Orange County Transportation Authority (OCTA) bus routes are provided along Harbor Boulevard and Imperial Highway in the vicinity of the project site (OCTA 2012).

Proposed demolition and remediation activities would not preclude pedestrians and cyclists from traveling along existing and planned pedestrian and bicycle facilities. The proposed project would neither create conflicts with adopted policies supporting non-vehicular transportation nor decrease the performance of these facilities. There would be no impact and no mitigation is required.

Mitigation Program

No mitigation measures are required.

4.17 UTILITIES AND SERVICE SYSTEMS

Relevant elements of the proposed project related to utilities and service systems include: (1) removal of existing on-site utilities as part of demolition activities with the exception of water and electric lines necessary for remediation activities, and specifically serving Building 8; (2) use of water for dust suppression and remediation activities; and (3) recycling of more than 99 percent of the demolition materials and disposal of the remaining demolition materials and some contaminated soils at appropriate landfills.

Impact Analysis

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

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

e) Result in a determination by the wastewater treatment provider which services or may serve the project that has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

No Impact. The project site has been vacant since 2011; the only operational building on site is a guard post located near Building 5. There is no existing wastewater generation from the project site. The proposed project involves the demolition of the existing on-site structures; no new development is proposed. Existing utilities would be removed to the limit of the property line with the exception of the electrical and water services needed for the remediation work. The proposed demolition and remediation activities would not involve discharge of any wastewater into the City's sewer system and existing sewer lines would be terminated and capped at property line.

The proposed project would not require the construction of new water or wastewater treatment facilities or the expansion of existing facilities, and no significant environmental effects would occur. No mitigation is required.

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

No Impact. The proposed demolition activities would involve removal of existing on-site storm drains during demolition activities and does not include any development or other uses that would require the construction of new storm water drainage facilities. Additionally, as previously addressed under Section 4.9, Hydrology and Water Quality, the amount of runoff from the project site would not increase since the amount of impervious surface would be reduced compared to the current conditions. The project would not require the expansion of existing facilities. No significant environmental impacts would occur and no mitigation is required.

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

No Impact. The City of Fullerton provides water service to the project site. The proposed project would result in the demolition of the existing on-site structures; no development is proposed. Water use for the proposed project would primarily be associated with dust suppression during demolition and remediation, and backfill and compaction. As previously identified, water service to Building 8 would also be maintained during remediation activities. It is estimated that water consumption for the proposed demolition and soil remediation components of the project would be 2.3 million gallons over a one year period with daily consumption varying depending on the demolition and remediation activities that are occurring (Yorke 2013). The project would not necessitate a need for long-term water resources and new or expanded entitlements for water supply are not needed. No impact would occur and no mitigation is required.

f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

Less than Significant Impact. As identified in Section 5.18, Solid Waste, of The Fullerton Plan EIR, the majority of the City's solid waste is disposed of at the Olinda Alpha Sanitary Landfill which is part of the Orange County landfill system operated by OC Waste & Recycling. Solid waste generated from the proposed project site would most likely be disposed at this landfill which is the closest landfill to the project site. The landfill currently accepts a maximum of 8,000 tons per day (tpd); closure of the landfill is currently planned for 2021 (OC Waste & Recycling 2013).

Demolition activities associated with the proposed project would generate approximately 58,120 tons of building material debris as shown in Table 4-9. However, the majority of the building material debris would be recycled (more than 99 percent), and only 171 tons would be disposed of at the local landfill(s) over a 3 month period. The majority of the demolition material (approximately 95 percent) would be concrete and asphalt which would be stockpiled on-site for reuse with future development on site. The solid waste generated from the demolition component of the project could be accommodated within the permitted capacity of the County's landfill system. This impact would be less than significant and no mitigation is required.

TABLE 4-9
SOLID WASTE FROM DEMOLITION

Building Material	Amount of Solid Waste Generated (tons)	Amount to be Recycled (percent)	Amount to be Disposed at Landfill (tons)
Wood	200	100	0
Roofing Paper	150	81	28.5
Drywall	600	81	114
Miscellaneous C&D	150	81	28.5
Copper	20	100	0
Steel	2,000	100	0
Concrete	40,000	100	0
Asphalt	15,000	100	0
Total	58,120	-	171

C&D: construction and demolition

Source: AMPCO 2013.

As described in Section 2, Project Description, the proposed project also involves the excavation of soils contaminated with VOCs and PCB. VOC-contaminated soils would be treated in the on-site ex-situ treatment technologies; however, PCB-contaminated soils would require off-site disposal at a permitted treatment, storage and disposal facility (TSDF). The maximum PCB-contaminated waste quantity expected to be hauled off site to the permitted landfill is 40 cubic yards. The proposed disposal facility for PCB- contaminated soils is the Chemical Waste Management facility at Kettleman Hills, approximately 204 miles northwest of the project site and/or the U.S. Ecology TSDF located in Nevada. The amount of PCB-contaminated soil would not exceed the capacity at either of these facilities.

g) Comply with federal, state, and local statutes and regulations related to solid waste?

No Impact. As identified in Section 5.18, Solid Waste, of The Fullerton Plan EIR, State, County and local agencies with regulatory authority related to solid waste include the California Integrated Waste Management Board, OC Waste & Recycling (County of Orange), and the City of Fullerton. Regulations specifically applicable to the proposed project include the California Integrated Waste Management Act of 1989 (AB 939), and Fullerton Municipal Code Chapter 5.16 (Waste Reduction and Recycling Plan Requirements for Construction and Demolition Projects).

AB 939 which requires every city and county in the state to prepare a Source Reduction and Recycling Element (SRRE) to its Solid Waste Management Plan, that identifies how each jurisdiction will meet the mandatory state waste diversion goal of 50 percent by and after the year 2000. FMC Chapter 5.16 establishes diversion requirements for construction and demolition activities and requires applicants to submit a Waste Reduction and Recycling Plan for approval. The purpose is to increase the amount of construction and demolition debris that is recycled or reused so as to reduce the amount that is disposed of in landfills.

As discussed above, over 99 percent of the demolition debris would be recycled which exceeds the State and local requirements of 50 percent. It should also be noted that all solid waste would be disposed of at appropriately permitted landfills. Notably, the Kettleman Hills landfill is permitted to accept most types of hazardous wastes as defined by the USEPA and the State of California, including PCB-contaminated soil.

No significant impacts would occur and no mitigation is required.

Mitigation Program

No mitigation measures are required.

4.18 MANDATORY FINDINGS OF SIGNIFICANCE

a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

No Impact. There are no sensitive biological resources, habitat, or species located on the project site that would be affected by the proposed project. As identified in Section 4.5, Cultural Resources, Building 1 (Administration Building) is a historic resource and would be retained and protected in place. No impact would result and no mitigation is required.

b) Does the project have impacts that are individually limited, but cumulatively considerable? ('Cumulatively considerable' means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

No Impact. For the majority of the impact categories, the proposed demolition project and remediation activities would have no impact or a less than significant impact. Potential impacts related to cultural resource and noise have been determined to be less than significant with implementation of identified mitigation measures. These impacts are site-specific and would not be cumulatively considerable.

c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

Less Than Significant Impact. The proposed project involves the demolition of existing structures and remediation of existing VOC- and PCB-contamination. The proposed project does not propose any new development. Compliance with identified RRs and implementation of identified MMs would ensure that potential impacts that have been identified related to cultural resources and noise would be less than significant. The proposed project would not cause substantial adverse effects on human beings, either directly or indirectly.