



# **CEQA EXEMPTION AND ENVIRONMENTAL ASSESSMENT**

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## **VETERAN'S MEMORIAL PARK SHOOTING RANGE LEAD ABATEMENT PROJECT COMMERCE, CALIFORNIA 90040**



### **LEAD AGENCY:**

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**SEPTEMBER 15, 2016**

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## 1. INTRODUCTION

Pursuant to the California Environmental Quality Act (CEQA) Guidelines, a Notice of Exemption (NOE) may be filed if the City of Commerce, in its capacity as the Lead Agency, determines that a proposed action or project is exempt from CEQA. According to the CEQA Guidelines, a NOE must contain the following information:

- A description of the proposed action or project;
- A finding that the proposed action or project is exempt, including a citation of the State CEQA Guidelines section or statute under which the project is found to be exempt; and,
- A brief statement in support of the finding.<sup>1</sup>

This NOE provides a description of the proposed Veteran's Memorial Park Shooting Range Lead Abatement Project and indicates the applicable sections of CEQA that support the findings for the CEQA exemption, and discusses the Lead Agency's findings that are applicable to the proposed project. This NOE also includes a discussion of the environmental impacts that support the NOE's findings for no impacts. This NOE and the supporting Environmental Assessment represents the City's independent judgment and position of the City of Commerce, acting as the Lead Agency. The project is being advanced by the City of Commerce.

## 2. PROJECT DESCRIPTION

### 2.1 PROJECT LOCATION

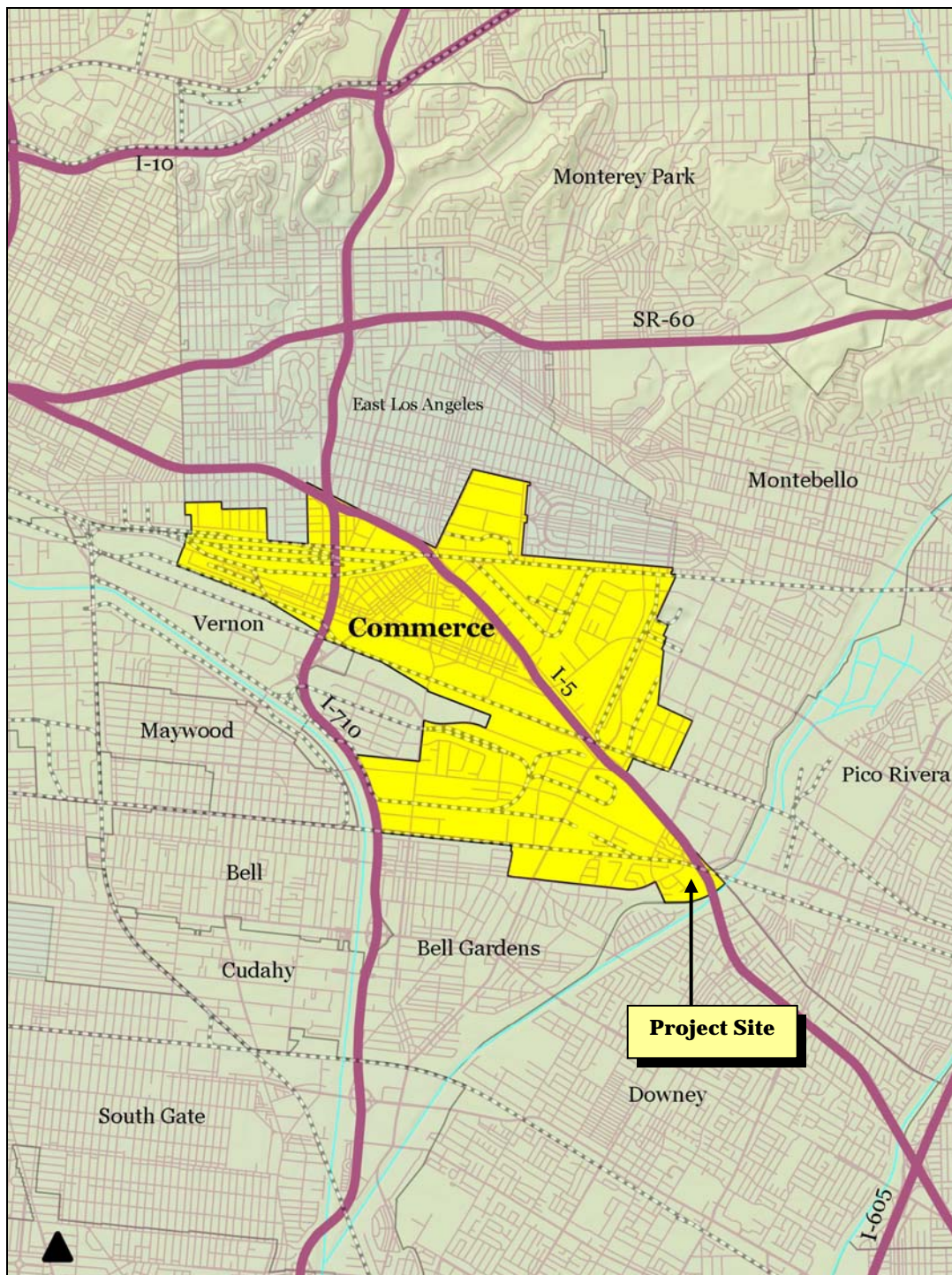
The proposed project site is located within Veteran's Memorial Park that is located in the southeastern portion of the City of Commerce. The City of Commerce is located approximately six miles southeast of downtown Los Angeles and is bounded by Montebello on the east; unincorporated East Los Angeles on the north; the cities of Vernon, Bell, and Maywood on the west; and the City of Bell Gardens on the south.<sup>2</sup> The project area's location in the City is shown in Exhibit 1. An aerial photograph of the project area is provided in Exhibit 2.

The former shooting range was located in the basement of the Veteran's Park Community Center. The lead represents the remnants of spent lead bullets related to the use of the indoor shooting range. The lead contamination is also the result of airborne indoor emissions that resulted from the use of the indoor firing range.

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<sup>1</sup> CEQA Guidelines California Code of Regulations, Title 14, Division 6, Chapter 3, Article 19. Categorical Exemptions. (Section 15300).

<sup>2</sup> United States Geological Survey. *Los Angeles 7 1/2 Minute Quadrangle*.



**EXHIBIT 1**  
**PROJECT LOCATION IN THE CITY**  
Source: Quantum GIS





**EXHIBIT 2**  
**AERIAL PHOTOGRAPH**  
Source: Google Maps



## **2.2 ENVIRONMENTAL SETTING**

The proposed project involves the abatement of lead within the former indoor shooting range at Veteran's Memorial Park. A residential neighborhood is located to the north and west of the site, while the Rio Hondo Channel extends along the southerly boundary of the park. Finally, parking areas and activity areas within the park are located to the east of the community center.<sup>3</sup>

## **2.3 PROJECT DESCRIPTION**

The proposed project involves the abatement of lead contamination associated with the historic use of the Veteran's Memorial Park's Indoor Shooting Range. The key elements of the proposed project include the following:

- The cleaning and abatement of the affected ventilation system, including the exterior range exhaust fan and fan room, the side yard and 200 linear feet of sound wall, one HVAC unit on the roof which serviced the former indoor shooting range, and cap duct work in walls;
- The cleaning and abatement of all range related equipment;
- The cleaning and abatement of ceiling and drywall panels;
- The bead blasting and resurfacing of the firing range floor and backstops for bullet traps; and,
- The proper removal and disposal of all debris generated by the proposed abatement.

## **3. APPLICABLE CEQA EXEMPTION (CLASS 30 EXEMPTION MINOR ACTIONS TO PREVENT, MINIMIZE, STABILIZE, MITIGATE OR ELIMINATE THE RELEASE OR THREAT OF RELEASE OF HAZARDOUS WASTE OR HAZARDOUS SUBSTANCES.)**

The City of Commerce has reviewed the proposed project and has determined that it is categorically exempt and qualifies for a Class 30 Exemption pursuant to the CEQA Guidelines (§15330). Class 30 consists of any minor cleanup actions taken to prevent, minimize, stabilize, mitigate, or eliminate the release or threat of release of a hazardous waste or substance which are small or medium removal actions costing \$1 million or less (the cost for the proposed project is estimated to be \$550,000).

No cleanup action shall be subject to this Class 30 exemption if the action requires the on-site use of a hazardous waste incinerator or thermal treatment unit or the relocation of residences or businesses, or the action involves the potential release into the air of volatile organic compounds as defined in Health and

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<sup>3</sup> Google Earth. Site Accessed September 15, 2016





Safety Code Section 25123.6, except for small scale in situ soil vapor extraction and treatment systems which have been permitted by the local Air Pollution Control District or Air Quality Management District. All actions must be consistent with applicable state and local environmental permitting requirements including, but not limited to, off-site disposal, air quality rules such as those governing volatile organic compounds and water quality standards, and approved by the regulatory body with jurisdiction over the site.<sup>4</sup>

## **4. FINDINGS SUPPORTING THE APPLICABLE CEQA EXEMPTION**

The City of Commerce, determined following a preliminary evaluation of the proposed project, that the proposed project would not result in any significant effects on the environment. This determination is based on the following:

### **4.1 LAND USE COMPATIBILITY**

The proposed project site is located within the existing Veteran's Memorial Park. The proposed actions will not involve any new development or a change in land use.

### **4.2 PROJECT SITE SIZE**

The proposed project site is located within the City on a project site of less than five acres that is substantially surrounded by urban uses.

### **4.3 HABITAT VALUE**

The proposed project site is surrounded by development on all sides. The improvement area's small size and its isolation from other open space areas limit its utility as a habitat or an animal migration corridor. The project site and surrounding areas are not conducive for the survival of any special status species due to the lack of suitable riparian habitat. According to the California Department of Fish and Wildlife, the site falls under the category of "urban development." As a result, no impacts will result from the implementation of the proposed project.

### **4.4 TRAFFIC, NOISE, AIR QUALITY, AND WATER QUALITY**

The approval of the proposed project would not result in any significant effects relating to traffic, noise, air quality, or water quality. These issue areas are discussed below:

#### **4.4.1 Traffic**

The proposed project will not involve any long-term traffic impacts. The proposed project will not result in any level of service impacts to nearby intersections.

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<sup>4</sup> CEQA Guidelines California Code of Regulations, Title 14, Division 6, Chapter 3, Article 19. Categorical Exemptions. (Section 153330).



#### **4.4.2 Noise**

The project site is located within an urbanized setting and the ambient noise characteristics reflect the surrounding urban environment. The predominant source of noise in the area is related to traffic on the nearby I-5 Freeway. Noise sensitive receptors in the immediate area include the residences located to the north and west of the site. Adherence to the City's noise control regulations will mitigate any potential construction noise-related impacts.

#### **4.4.3 Air Quality**

The air quality impacts associated with the proposed project's implementation include short-term (construction-related) emissions. No long-term operational emissions will occur. The potential construction-related emissions will be minimal and will be limited to the use of machinery and employees traveling to and from the job site. The proposed project will have a beneficial air quality impact in that it involves the removal of lead contaminants.

#### **4.4.4 Water Quality**

The project will not change the runoff or hydrological character of the site. All remediation activities will be required to meet all discharge requirements in accordance with the Clean Water Act. As a result, no impacts are anticipated.

### **4.5 PUBLIC SERVICES**

The proposed project site is located within the existing Veteran's Memorial Park. The proposed actions will involve the abatement of lead contamination from the previous indoor shooting range. The abatement project will not result in any adverse impacts to the Los Angeles Fire Department, Los Angeles County Sheriff's Department, educational services, or other governmental services. The City of Commerce Parks and Recreation Department operates nine parks, including Veteran's Park. The proposed project will be beneficial in that it will abate the existing lead contamination associated with the former operation of the indoor firing range.

### **4.6 UTILITIES**

The proposed project site is located within the existing Veteran's Memorial Park. The proposed actions will involve the abatement of lead contamination from the previous indoor shooting range. The abatement project will not result in any adverse utility impacts.



#### 4.7 ADDITIONAL FINDINGS

Furthermore, the City of Commerce makes the following additional findings in support of a CEQA exemption for the proposed project:

- No dislocation of on-site or off-site structural improvements will be required to accommodate the proposed project.
- The project site does not contain any sensitive environmental resources. The surrounding areas have been disturbed as part of the previous development
- The project site is located within an urbanized area of the City of Commerce. No scenic resources or scenic corridor will be affected by the proposed project (refer to the previous discussion).
- The project site is not located within an area, nor does it include a site listed on the Department of Toxic Substances Control (DTSC) or the Secretary for Environmental Protection as identified as being affected by hazardous wastes (refer to the previous discussion).
- The proposed project will not result in any adverse impacts on historic resources (refer to the previous discussion).
- The proposed project will not require any review by a State trustee or responsible agency.

Section 15300.2 of the CEQA Guidelines (Exceptions), provides conditions under which categorical exemptions are inapplicable. As described in the section below, none of the exceptions apply to the project.

- The project site is surrounded by urban development. The project site has not been designated as a sensitive or biological site and no sensitive or biological resources have been identified on the lot that will be impacted by the project. The project site does not contain any designated, previously mapped, or officially adopted hazardous or critical concern. Therefore, the project will not have the potential to adversely impact sensitive or biological resources.
- *Cumulative Impact.* No new development will occur as part of the remediation project. In addition, the project would entail temporary and limited construction activities within a limited area. Therefore, no cumulative impacts will be expected to result from the proposed project.
- *Significant Effect.* There are no known unusual circumstances associated with the project. Additionally, the project has been designed and will be implemented in compliance with all relevant regulations and policies that govern construction efforts (including but not limited to the City's construction standards and requirements) in order to avoid potentially significant impacts to environmental resources. Therefore, it is not anticipated that the project will have a significant effect on the environment due to unusual circumstances.



- The project site is formerly developed and does not contain any scenic rock outcroppings. Lastly, the project site does not contain any buildings listed in the State or National registrar.
- The project is located on a site which is included on any list compiled pursuant to Section 65962.5 of the Government Code. The project site is not included on any list compiled pursuant to Section 65962.5 of the Government Code.
- The project site does not contain any known historic resources. While it is highly unlikely at the project site, should any potential resources or human remains be uncovered during ground disturbing activities, as a project implementation practice, work at the project site will stop immediately and will not resume until the potential historic resources are evaluated by a qualified archaeologist, coroner, or Native American representative, as appropriate. As such, the project will not be expected to cause a substantial adverse change in the significance of a historic resource.

Based on the analysis provided in this Notice of Exemption, the project meets and complies with the conditions and requirements of CEQA Guidelines Section 153300 (Class 30) and will not have any significant environmental impacts.

## **5. DISCUSSION OF LEAD AGENCY'S FINDINGS**

The City of Commerce may make the following findings with regard to the proposed project's exemption from the environmental review requirements outlined in CEQA:

- The proposed project will be confined to the project site and no dislocation of off-site uses will occur.
- The proposed project does not have a possibility of creating any significant environmental effects. The basis for this determination was discussed in the preceding section.
- The proposed project will not result in any impacts to sensitive resources.
- The proposed project will not result in any cumulative impacts; have the potential for damaging scenic resources; involve the placement of a project over a site the Department of Toxic Substances Control (DTSC) and the Secretary for Environmental Protection has identified as being affected by hazardous waste; or result in any impacts on historic resources.<sup>5</sup>

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City of Commerce

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Date

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<sup>5</sup> Guidelines for the Implementation of the California Environmental Quality Act, Article 5. § 15061(b)(3).