APPENDIX A

DTSC Initial Study Checklist

INITIAL STUDY

PROJECT TITLE: Former Pomona Manufactured Gas Plant (MGP) Site		CALSTARS CODING: 9510-17
PROJECT ADDRESS: 148 North Huntington Street Pomona, California 91768	CITY: Pomona	COUNTY: Los Angeles
PROJECT SPONSOR: Southern California Gas Company (SoCalGas)	CONTACT: Mr. Ben Ellis	PHONE: (213) 244-4006

APPROVAL ACTION UNDER CONSIDERATION BY DTSC:

☐ Initial Permit Issuance ☐ Permit Renewal ☐ Permit Modification ☐ Closure Plan
☒ Removal Action Workplan ☐ Remedial Action Plan ☐ Interim Removal ☐ Regulations
☐ Other (specify):

STATUTORY AUTHORITY:

☒ California H&SC, Chap. 6.5 ☒ California H&SC, Chap. 6.8 ☐ Other (specify):

DTSC PROGRAM/ ADDRESS:	CONTACT:	PHONE:
Cal/EPA, Department of Toxic Substances Control Southern California Cleanup Operations Branch 9211 Oakdale Avenue Chatsworth, California 91311	Mr. Tedd Yargeau, Project Manager Southern California Cleanup Operations Branch	(818) 717-6545; (818) 212-5340

PROJECT DESCRIPTION:

The Department of Toxic Substance Control (DTSC) is considering a draft Removal Action Workplan (RAW) for the Former Pomona Manufactured Gas Plant (MGP) site (Site) pursuant to authority granted under Chapter 6.8, Division 20, California Health and Safety Code (H&SC) Section 25355(a)(1). The draft RAW, which has been prepared by Parsons on behalf of the Southern California Gas Company (SoCalGas), proposes to excavate and haul off-site approximately 10,000 cubic yards of contaminated soils. Additional clean soil excavation may be necessary for geotechnical purposes as part of the work; however, the clean soils will be utilized on-site as part of the backfill operation.

Based on the health risk assessment (HRA) prepared by Iris Environmental and presented in the Supplemental Site Investigation / Health Risk Assessment Report (SSI/HRA) dated June 2004, the major Chemicals of Potential Concern (COPC) for this Site are carcinogenic polycyclic aromatic hydrocarbons (CPAHs), polycyclic aromatic hydrocarbons (PAHs), total petroleum hydrocarbons (TPH), arsenic, lead, and volatile organic compounds (VOCs). Visual indications of lampblack, a by-product of the MGP operations, were previously observed during the investigative phase of work. COPCs found in lampblack are primarily PAHs. Other MGP residues may include metals, spent oxide, feedstock oil, and oil sludge. Spent oxide, used to purify the gas, may have had residues containing cyanides. Feedstock oil and oil sludge from storage tanks or vaults may have contained PAHs, and aromatic compounds (benzene, toluene, ethylbenzene, and total xylenes [BTEX]). During the Site investigation phase, components of these residues were specifically targeted for laboratory analysis.

The impacted soil will be transported off-site for treatment and/or disposal. The project involves the removal of impacted soil in accordance with the methods and procedures presented in the draft RAW (Parsons, 2016). SoCalGas is performing the investigation and remediation of the Site in accordance with the DTSC Voluntary Cleanup Agreement (VCA), Docket No. HSA-A 00/01-241, and under the authority of Division 20, Chapter's 6.5, and 6.8 of the California H&SC. The overall remedial action objective for the Site is to remediate impacted material to a point that the Site would have no environmental land-use restrictions and could be used for residential development purposes. The remedial work will improve the quality of the Site and be beneficial to the public.

The proposed excavation and backfilling operations are anticipated to take approximately 6 months to complete. The remedation will occur in two phases; Phase I (The Annex Yard) of the remediation activities will have approximately 75 working days (100 calendar days); 60 of the 75 working days will be material hauling days, the remaining 15 days are for Site demolition and restoration. Phase II (The Water Yard) of the remediation activities has a similar proposed time schedule. Each truckload is estimated to have a haul capacity of 18 cubic yards, and and average of 10 truckloads per day is estimated, with a maximum of 20 truckloads per day.

In order to allow cleanup of soils underneath structures at the Site, and because of the age of the structures, all existing buildings on site will be demolished before excavation of impacted soils can proceed. In order to accommodate City of Pomona operations in this site, demolition of buildings will be done in two separate phases, as described above. All hazardous materials in buildings will be surveyed, documented, and abated prior to obtaining demolition permit from the City and prior to demolition of the structures on Site.

After the remediation is complete, the Site will be backfilled to grade and turned over to the City of Pomona. SoCalGas will remove and dispose of all pavement (concrete and/or asphalt) from both the Annex and Water Yard. The soil removed to perform the actions required in the RAW will be replaced with clean soil.

Site Description and History

The Former Pomona MGP Site is located at 148 North Huntington Street, Pomona, California (Site), as identified in Figure 1. The Site occupies approximately 2.6 acres (See Appendix A for copies of all figures). Figures 2a and 2b, present Assessor's Parcel Maps. Commercial properties surround the Site in most directions. The Site is bound by Commercial Avenue to the north, Huntington Street to the west, the Southern Pacific Railroad Right-of-Way to the south, and the City of Pomona Police Department to the east. Residential sites are shown north and northwest of the Site. The Site is currently owned by the City of Pomona and operated by the City of Pomona Water Department.

A review of historical records indicates that from 1887 until 1917, a coal gas and oil gas plant was operated at the Site by various utilities, including Pomona Gas and Electric Light Company, Pomona and Ontario Light and Fuel Company, Edison Electric Company, Southern California Edison Company, and Southern Counties Gas Company. Natural gas was available in Pomona in approximately 1917 and the gas plant Site was then converted to a natural gas storage and distribution facility. The Site continued as a natural gas storage and distribution operation until 1955. Sanborn maps from 1911 indicate the plant was still operational, whereas a 1928 map shows that most of the plant structures had been removed and replaced by warehouses, an office and an auto repair shed. Between 1917 and 1955, the natural gas facility was operated by Southern Counties Gas Company (a predecessor of the Southern California Gas Company). Since 1955, the City of Pomona Water Department has used the Site as a corporate yard and operating base. Currently, office buildings, warehouses, auto maintenance sheds, and parking lots are located on the Site. The Site is paved (concrete and asphalt) with minimal exposed soil and sparse weeds.

Current and Future Land Use

The area of the Former MGP Site is currently paved with minimal exposed soil and sparse weeds, office buildings, warehouses, auto maintenance sheds, and parking lots, bordered by fences around the property. The Site is currently owned by the City of Pomona and operated by the City of Pomona Water Department. Surrounding land use is primarily commercial, with some residential nearby. The City of Pomona has proposed to construct a new service yard at this Site after remediation is complete and the Site receives a no further action letter from the DTSC.

Previous Investigations

<u>1992 PEA Investigation</u>

Preliminary Endangerment Assessment (PEA) sampling field activities were conducted on August 3 and 4, 1992. This sampling indicated that a release of hazardous substances/wastes had occurred at the Site. The predominant class of contaminants identified, PAHs, are associated with prior MGP related Site activities. During the course of the PEA sampling activities, seven soil borings were completed to total maximum depths to twenty feet below ground surface (ft bgs). The borings were identified as PB-1 through PB-7. Selected soil samples were analyzed for pH, TPH, PAHs, priority pollutant scan, metals, and cyanide. Selected soil samples were collected at depths of 1-, 2-, 5-, 7.5-, 10-, 15- and 20-ft bgs. The 15- and 20-ft bgs samples were analyzed only if PAHs or TPH were detected in the 10-ft bgs samples. Five surface soil samples (PS-1 through PS-5) were also collected. PAHs were detected at all boring locations, and at sampling depths ranging from 1 to 20 feet bgs. The highest concentration of PAHs was detected in boring PB-5 at 10 feet bgs. Based on an evaluation of historic Sanborn maps (1895, 1906 and 1911), the boring locations correspond to the locations of the former four gas holders at the western end of the Site (PB-1), two gas holders (PB-2), oil tanks (PB-3), settling basin (PB-4), concrete

purifier boxes (PB-5), and exposed stained soil areas (PB-6 and PB-7). With the exception of PB-5, there were no PAHs detections at depths greater than 5 feet bgs. Table 2-1 of the PEA presents analytical results for PAHs. TPH was only detected in soil boring PB-5 with the highest concentration observed at 5 feet bgs, corresponding to the highest concentration of PAHs. The maximum depth of TPH-impacted soil in boring PB-5 was 20 feet bgs. Table 2-1 presents PEA analytical results for TPH. BTEX constituents were mostly non-detect. Benzene and ethylbenzene were not detected. Only toluene detections were observed, in soil borings PB-2, PB-3 and PB-5. Toluene detections were restricted to 1 foot bgs in soil borings PB-2 and PB-3. Toluene detections were observed at all sampled depths in soil boring PB-5. Xylenes were only detected in PB-5 at 5, 10 and 15 feet bgs. Table 2-1 presents PEA analytical results for BTEX. Cyanide and heavy metals were detected in soil samples collected during the PEA. Analysis for metals were restricted to soil samples collected at a depth of 1 foot bgs in all soil borings. However, analysis for arsenic, lead and mercury was also performed in soil samples deeper than 1 foot bgs. Antimony, molybdenum, and thallium were not detected at any sampled depth. The highest concentrations for arsenic, barium, beryllium, cadmium, chromium, cobalt and vanadium were all detected at PB-6 at 1-foot bgs at 11.8 milligrams per kilogram (mg/kg), 87.2 mg/kg, 0.6 mg/kg, 1.0 mg/kg, 25.5 mg/kg, 11.5 mg/kg, and 44.0 mg/kg respectively. The highest copper detection of 30.4 mg/kg was detected at PB-3-1 at 1-foot bgs. The highest lead detection of 64.4 mg/kg was detected at PB-7 at 2-feet bgs. The highest mercury detection of 0.22 mg/kg was detect at PB-3 at 1-foot bgs. The highest nickel detection of 19.1 mg/kg was detected at PB-2 at 1-foot bgs. Selenium was only detected at PB-6 at 1-foot bgs, with a concentration of 0.12 mg/kg. The highest zinc concentration of 90.2 mg/kg was detect at PB-2 at 1-foot bgs. Analysis for cyanide was performed on borings PB-4, PB-5 and PB-7 at depths up to 10 feet bgs. Table 2-2 of the PEA presents analytical results for metals. The priority pollutant scan was performed on the 1 foot bgs samples from soil borings PB-2 and PB-5. Results were mostly non-detect for VOCs, pesticide and poly-chlorinated biphenyl (PCB) constituents. Semi-volatile organic hydrocarbon detections were observed, with fluoranthene, a non-CPAH, present at the highest concentrations. Table 2-3 of the PEA presents analytical results for priority pollutants. PAHs were detected in all five surface soil samples. The highest detected concentration of benzo(a)pyrene equivalent was 88.4 ppm in surface soil sample PB-5.

During the course of the PEA investigation, five background samples were collected offsite in order to compare concentrations of constituents on the Site to natural and/or anthropogenic background concentrations (PBG-1 through PBG-5). Locations of these sampling points are documented on in the PEA. These samples were analyzed for PAHs, Title 22 metals, pH and total cyanide.

The PEA conducted in 1992 concluded that:

(1) Subsurface and surface soils at the Site contain levels of PAHs and inorganic constituents that exceed PEA screening values.

(2) PAHs were detected in 14 of the 24 subsurface samples collected from the 7 borings. In surface soils, PAHs were detected in all five samples collected from landscaped areas.

(3) Except for mercury and thallium, the inorganic constituents were present at concentrations only slightly above the background range and are believed to be representative of background levels. Thallium, typically not associated with MGP operations, was present in concentrations slightly above the background levels. Mercury exceeded background concentrations in only one anomalous surface soil sample.

(4) PAHs are the primary chemicals of concern. PAH contamination in subsurface soils was primarily limited to the top 2 feet. Boring PB-5 was the only location, out of seven locations sampled, where PAHs were detected at 5-, 10, 15-, and 20-feet bgs.

(5) It is unlikely the PAHs detected in subsurface soils pose a threat to public health because the entire Site, with the exception of landscape areas, is paved. However, the concentrations may potentially present an exposure threat if future excavation activities were conducted within the affected areas.

(6) The Site does not pose a threat to environmental resources, as no sensitive habitats or species are present in the immediate area of the Site. Upon review of the PEA, DTSC recommended that further investigation or assessment of the Site be performed.

Supplemental Site Investigation

A Supplemental Site Investigation (SSI) was conducted by Parsons to further assess the lateral and vertical extent of impacted soil, in response to DTSC's recommendations based on the PEA. The SSI was conducted during four events: August 2002, January 2003, June 2003 and April 2004. The SSI included the drilling and sampling of soil vapor and soil borings. Parsons' field investigation consisted of four components:

(1) Non-biased soil sampling conducted in August 2002, with additional biased sampling performed to delineate areas where impacted soil was previously identified in the PEA;

(2) Additional biased soil sampling conducted in January 2003 to further delineate PAHs, metals and VOC detections identified during the August 2002 investigation;

(3) Additional biased soil sampling conducted in June 2003 to further delineate PAHs, metals and VOC detections identified during the January 2003 investigation; and

(4) Soil gas sampling conducted in April 2004 at four soil gas probe locations.

Localized MGP contamination was identified in soil and soil gas during the course of the multiple SSI sampling events. Notable Site contaminants included: CPAHs, PAHs, TPH, arsenic, lead, and VOCs. Twelve soil borings exhibited visual observations of lampblack. The soil gas sampling was focused in the vicinity of boring P-SS-39, beneath the existing structure where non-aqueous phase liquid (NAPL) was found in soil. A total of four soil gas probe locations were installed: three probes were located within the City of Pomona office building, and one probe was located immediately west of the office building. There were soil gas detections for BTEX, butylbenzene, isopropylbenzene, isoproyltoluene, trimethylbenzene, and chlorinated VOCs. The highest BTEX concentrations in soil gas were reported at SV-39 at 5-feet bgs, which is in close proximity of the suspected source area at soil boring P-SS-39.

City of Pomona Investigation

In 2003, the City of Pomona performed environmental soil and groundwater sampling at locations within the boundaries of the former MGP Site, and also at off-site locations. The sampling was conducted by SCS Engineers (SCS). Nine borings (OSB-1 through OSB-9) were advanced within the boundaries of the former MGP Site or in the immediate vicinity of the former MGP Site. Forty-nine soil samples were obtained at depths ranging from 1- to 50-feet bgs. Soil samples obtained at each boring location were analyzed for PAHs and metals. Analysis for TPH, VOC, cyanide and PCB in soil was conducted at select boring locations. The environmental data obtained by the City of Pomona substantially supports the data obtained by SoCalGas.

A supplemental deep boring (OSB-9a) was advanced to a depth of 90-feet bgs to investigate potential gasoline impacts in soil and groundwater as a result of post-MGP Site operations not related to SoCalGas operations at the Site.

The summary investigation results of the sampling conducted by SCS, for both on-site and off-site areas, are presented in a report titled *Additional Soil Sampling Recommendation, Pomona Corporation Yard*, dated September 18, 2003.

Project Activities

Project remedial activities are described in the RAW (Parsons, 2016), which was developed under the direction of the California Environmental Protection Agency's (Cal-EPA's) DTSC in accordance with the VCA, Docket No. HSA-A 00/01-241, and under the authority of Division 20, Chapter's 6.5, and 6.8 of the California H&SC. The remedial action objective for the Site, as stated in the RAW, is to *"to remediate the Site to a point that long-term use restrictions on future Property usage would not be necessary…." And, " to restore the Site to a condition that would be safe and suitable for future hypothetical residential and other uses (c)."* Because the remedial work cannot be implemented without the demolition of the current structures on site, the existing strucutres on site will be demolished in two separate phases prior to SoCalGas initiating remedial work.

Pre-remedial Activities

The excavation of contaminated soils for this site will involve evaluation and survey of hazardous materials in seven structures which are targeted for demolition. The following steps will be implemented prior to excavation of the contaminated soils:

- Pre-demolition regulatory compliance and permitting planning
- Development of a permitting and regulatory agency review schedule
- Assessment of potential hazardous materials in buildings and Universal wastes
- Preparing a hazardous materials abatement plan and scope
- Implementation of the abatement plan prior to obtaining a demolition permit from the City of Pomona
- Obtaining a demolition permit from the City of Pomona,
- Demolition approach, phasing and sequencing

- Evaluation of recycling and cost recovery strategies for equipment and demolition debris
- Implement demolition and begin soil excavation

For demolition of the seven structures depicted on Figure 3, SoCalGas will ensure compliance with applicable federal, state, and local (City of Pomona) requirements, as well as adherence to applicable codes and standards for building abatement and demolition, utility termination, and management of impacted demolition debris, waste, and soils. SoCalGas will develop a schedule of required permits with applicable permitting agencies / authorities, time lines for review/approval, as well as a strategy for permit filing. Following the completion of the demolition plans, the remedial phase of the project will be implemented. SoCalGas does not plan construction of any facilities on site; therefore, no impact from redevelopment plans was evaluated under this document. It should be noted that the City of Pomona plans to redevelop the site and that the impact of the redevelopment plans will be evaluated under a separate document by the City.

Excavation Areas and Methodology

The area and volume of contaminated soil at the Site have been estimated based on the data generated from the field investigations detailed above. The volume of contaminated soil initially targeted for excavation is calculated from areas shown on Figure 3. Based on the mapped area and the approximate depths, the volume of soil that would be excavation, absent any physical constraints and/or access limitations, is estimated to be on the order of about 12,000 cubic yards, or approximately 18,000 tons. Approximately 10,000 cubic yards of impacted soil will be removed and disposed of off-site; the remaining is expected to be non-impacted soil which will be excavated for geotechnical / slope considerations during the excavation activities.

The RAW contains a more detailed representation of all sample areas with the constituents of concern above the proposed Preliminary Evaluation Concentrations (PECs). The estimated lateral area of remediation (AOR) and depth of contaminated soil initially targeted for removal are also presented in the RAW. The AOR area was developed using the information provided in the RAW along with the geologic descriptions from the boring logs prepared during the investigations at the Site as outlined in the SSI report. It is anticipated that the majority of shallow soil excavation will be completed using the conventional excavation methods. In areas bordering Site features such as fences, structures, and other above ground facilities, strict structural support and shoring requirements will be imposed in order to ensure the integrity of the Site and its surrounding features. Equipment used for Site excavation is listed separately.

Institutional Controls, Implementation and Enforcement Plan

Institutional controls are non-engineering mechanisms used to implement land-use restrictions that will be used to prevent exposure of future residents, workers or other property users to hazardous materials, hazardous wastes or constituents, or hazardous substances remaining on Site; to ensure the integrity of the remedial action; and to allow DTSC and its authorized representatives access the Site to maintain and ensure the remedial action. The land-use restrictions are necessary to ensure the protectiveness of and prevent damage to or interference with the remedial action. Monitoring, inspections, and reporting will be conducted to ensure compliance with the land-use restrictions.

<u>Soil Management Plan</u>

A Soil Management Plan will be prepared for the Site that outlines the procedures to be used for handling, storage, transport and disposal/recycling of all materials generated at the Site. This plan will identify methods for characterization of material (sampling and analysis). In addition, this plan will provide criteria by which the materials can be characterized and profiled for shipment to a treatment facility, or the appropriate Class I, II and/or III disposal facilities (i.e., landfills).

<u>Off-site Treatment of Contaminated Soil</u>

Soil or construction debris contaminated primarily with CPAHs will be transported to Soil Safe Facility (Soil Safe), located at 12328 Hibiscus Avenue, Adelanto, California. The Soil Safe facility is approved by SoCalGas as a treatment/recycling facility. Prior to transportation of contaminated materials to Soil Safe, a Soil Data and Certification Sheet will be completed as part of the waste acceptance requirement;

<u>Backfill and Compaction</u>

Once a contaminated area is fully excavated, and confirmation soil matrix sampling indicates that backfill operations can be initiated, clean import soil will be delivered to the Site. The following procedures will be used by the Field Supervisor:

- Identify the intended source of fill, and ensure that its quality is acceptable for backfill as described in the DTSC's Information Advisory Fact Sheet (October 2001) for Clean Fill Requirements. This Fact Sheet will be used as a tentative guideline for acceptable backfill quality. Also, soil physical characteristics acceptable for fill are identified in ASTM Method D1557. City of Pomona does not have any additional acceptance criteria beyond DTSC's testing and acceptance criteria.

- Observe the bottom of excavation to ensure that loose soil has been removed, and that there is a firm and unyielding base to support the fill material;

- Subsequent to the removal of loosened soil, the exposed ground will be scarified (scratched) to a depth of 8 inches, moistened as required to achieve a condition near optimum moisture content, and re-compacted under the Soil Engineer's direction;

- After the bottom of the excavation is re-compacted, the contractor will place import soil in loose lifts of approximately 6 to 8 inches, moistened as required to achieve conditions near optimum moisture content;

- Compact and perform compaction tests under the Soil Engineer's direction. Compaction tests will be performed by the Soil Engineer in accordance with ASTM Method D1557. Field density tests will be performed utilizing the Sand Cone method in accordance with ASTM Method D1556. A minimum of 90 percent relative compaction will be required; and

- The number of field density tests to be conducted will be based on the recommendation of the Soil Engineer.

Site Access and Security

An existing 8-foot high wall encloses the Site and is constructed with concrete masonry units (CMU). Site access is currently provided through a gate on Huntington Street (access from the southwest side). An additional gate is located outside the original MGP parcel on Commercial Street. This gate is locked under normal operating conditions. Except during active haul operations, all gates, except the one on Huntington Street, will be locked for Site safety and security.

An exclusion zone, contamination reduction zone (decontamination zone), and support zones, as well as the staging area (collectively known as the work zones) will be established within the walled area where remedial activities will occur. During non-working hours, Site access will be prevented via locked gates. During all remedial activities, Site access will be restricted to authorized personnel only.

Traffic Control

Except during active hauling operations, traffic control measures will be limited to Huntington Street, on which traffic is relatively light, and mostly limited to local traffic. Extreme caution will be exercised while entering and exiting the work area to ensure safe and uninterrupted traffic flow. During soil hauling periods, traffic into and out of the Site will be planned to minimize impact to traffic flow. Traffic on Commercial Street is also considered light, and adequate measures will be taken to ensure that impact on Commercial Street is mitigated and minimized in the event the gate at Commercial Street is used during remediation activities. Entrance into and departure from the Site by trucks will be facilitated by flagmen.

Noise Monitoring and Control

The purpose of the noise monitoring and control plan is to identify noise sources, receptors, and monitoring methods, and to reduce the noise level during the Site remediation operation via engineering mitigation measures. At a minimum, the following will be incorporated into the requirements for remediation:

- Expected sources of noise during remediation may include heavy earth moving vehicles and machinery, saw-cutting, and generator operation. Manufacturers' equipment will be reviewed for anticipated noise levels and mitigation measures for reduction of noise;

- Potential noise receptors consist of on-site workers, oversight personnel, pedestrians adjacent to the Site, and nearby workers and residents;

- Equipment operation will be limited to daylight hours, Monday through Friday. After daylight hours and during weekends, work will be performed under local ordinance requirements, or under a special Site-specific noise variance;

- In general, the excavation equipment to be used at the Site is not exceedingly large and will be properly and routinely maintained such that the noise levels will be relatively low; and

- Appropriate worker noise protection will be required within the exclusion zone.

Odor Monitoring and Control

The primary potential odor source at the Site will be MGP-related. Excavation at MGP sites may cause the emission of petroleum and/or naphthalene odors. However, based on the minimal levels of naphthalene and other VOCs detected at the Site, the likelihood of odor nuisance is considered minimal.

In most excavation cases, by controlling the dust with the procedures discussed below, the emissions of airborne contaminants will be significantly reduced to levels that pose no risk to the health of the public or remediation personnel. The water spray used to control dust will also significantly reduce the emissions of any potential volatiles that may be present in the soil. In addition, the loading and transportation of soil on a routine basis will minimize or avoid soil stockpiling, thus reducing potential emissions of volatiles. Any stockpile of contaminated soil or exposed excavation left overnight at the Site will be properly covered with plastic so emissions of volatiles are minimized if not eliminated. In the unlikely event of moderate VOC or odor emissions, the following procedures will be implemented:

- Use of chemical suppressants mixed with water and applied using various applications such as spray or mist. The application will be targeted toward the soil disturbance activity so that the sources of odor and VOC migration are effectively controlled;

- Use of plastic sheeting to cover the sidewalls of the trench during non-active remedial activities will minimize the migration of VOCs and odors;

- Alternative work sequencing, such that excavation of soil with potential odor during midday or afternoon (during hot weather) is avoided;

- Any highly odorous soil will be segregated and placed inside a roll-off bin equipped with a lid. This will result in minimizing the amount of highly odorous soil exposed during loading; and

- Balancing the excavation with transportation so that the need for large stockpiles is eliminated.

As part of the health and safety requirement, monitoring of excavations and the perimeter of Site activity will be conducted using a photo-ionization detector (PID). This instrument will be calibrated on a daily basis, according to the manufacturer's specifications. If sustained elevated readings are recorded during the remediation activities, then proper engineering control measures will be implemented to reduce the emission of volatiles. Perimeter air monitoring will be conducted to monitor the for VOCs, PAHs and dust. Although the odor generated from the excvation of impacted soil may not pose a health hazard, appropriate engineering measures will be used to control nuisance odor.

Dust Control

To comply with AQMD rules (i.e, Rules 401, 402 and 403) and the Health and Safety Plan, dust control measures will be implemented during remediation activities. The planned excavation area is approximately 57,000 square feet (approximately 1.3 acres), and is expected to require some efforts in controlling dust. Additionally, since the site asphalt and the buildings on site will be demolished, it is expected that the entire 2.6 acres site surface will require dust control and mitigations. Typical dust control measures, including water spray, spray of water amended with environmentally safe additives (such as Simple Green, or Envirotech Vapor Suppression, or equivalent), application of chemical foams, or coverage of VOC sources or clean soils with plastic sheeting, may be considered.

On-site monitoring of dust levels is planned, as required by the Health and Safety Plan. Special considerations will be applied during earth moving operations (excavation, contaminated soil loading, and unloading of clean soil).

Dust levels will also be monitored during demolition, excavation and loading activities at the Site perimeter. If the monitoring data at the Site perimeter indicates that dust levels are beyond the AQMD Rule 403 limit of 50 ug/m^3 above background, then additional engineering control measures, listed above, will be implemented to reduce the dust level. In the event that stockpiles of contaminated soil or surface excavations are left overnight, the exposed portion will be properly covered with plastic to reduce dust emission. The equipment proposed for the Site's remediation will be maintained properly, so that exhaust emissions will be within acceptable standards. If

necessary, the tires of soil transport trucks will be sprayed in order to prevent tracking of soils off-site, and to decrease fugitive dust levels outside the Site perimeter.

Stormwater Management

Although performed in 2-phases, the site demolition excavation and backfill are expected to require run-off containment of up to 2.6 acres. Because more than 1-acre of site cap will be disturbed, a Stormwater Polution Prevention Plan (SWPPP) will be required for the duration of remdial work. SoCalGas and its contractors will prepare an SWPPP and submit it to the California Water Resources Controls through a Stormwater Multiple Application and Reports System (SMART). The purpose of the SWPPP is to prevent surface runoff from entering or exiting the work area. There is one storm drain collection sump in proximity to the area of remediation, located north of the planned excavation area, in the vicinity of the Huntington Street entrance. In the event that remediation activities extend into the rainy season, this storm drain will be temporarily protected by placing a waterproof cover over the drain. Placement of berms around the excavation area (e.g. sand bags) will prevent run-off from the excavation area, and run-on into the excavation, minimizing the amount of contaminated wastewater handling. These measures will be evaluated on a daily basis during active remediation activities to ensure that they function properly. Additionally, the following procedures will be implemented at the Site during the rainy season:

- The weather forecast will be monitored very closely. When heavy rain is forecasted, remediation activities will be stopped;
- The run-on water from non-impacted areas will be properly diverted to an off-site storm drain. The water within the excavated area will be pumped and stored in appropriate containers for profiling prior to disposal at an approved treatment or disposal facility. If quantities are relatively small, impacted stormwater may be used for dust suppression on contaminated soil to be removed;
- The excavation will be conducted in small sections so that the exposed excavation can be covered immediately, if rainfall begins, to keep water out of the excavation;
- Proper procedures will be used to ensure that any wet soil/mud does not stick to tires of trucks used for soil transportation and is not tracked off-site. The procedure may include placing plastic sheeting at the loading area; and
- Plastic sheeting will be used extensively to make sure that the area of excavation is protected from rain during off hours and during sudden heavy rain.

In general, with the exception of dust and odor control measures, the excavation will be kept dry in order to make sure that no wastewater is generated, no environmental concerns arise, and the backfilling of the excavation can be conducted promptly. The Stormwater Plan will be prepared by a Certified QSD/QSP.

Supplemental Environmental Controls

Other environmental controls may be required in the event that anticipated conditions at the Site change. Remediation will be conducted in a proactive manner in order to identify and account for developing conditions and provide appropriate engineering measures to mitigate any developing conditions.

Spill Contingency

In the unlikely event that a release of hazardous material occurs at the Site during remedial operations, a spill response plan will be developed and included in the RAW for the Site. The spill response plan will provide the reporting information/contacts, procedures for controlling the spill including keeping the material from entering adjacent storm drains, and for the management of underground storage tanks, if encountered.

Health and Safety

A Site Specific Health and Safety Plan (HASP) has been developed for the excavation and hauling activities associated with this project. The HASP is presented in the RAW, and has established the minimum requirements, policies and procedures adequate to protect Site workers, public, and the environment from the predicted Site hazards. All remediation contractors, involved in removal, transport, and handling of impacted material at the Site will be required to abide by these minimum requirements. This HASP will be a “living” document such that in the event that unanticipated conditions occur at the Site, the plan will be modified accordingly.

Documentation of Removal Activities

Prior to removal action activities, photo-documentation of the Site will be performed. The photographs will show the condition of the Site prior to work activities. Photographs will be taken with a digital camera. The excavation limits will be surveyed and documented.

During field activities, the contractor will maintain daily logs that, at a minimum, will include:

- Sign-in and sign-out of all personnel at the Site;
- Activities conducted;
- Excavation material types and quantities. The remediation contractor will be responsible for detailing the excavation material quantities and types;
- Materials hauled to the Site, material used and excess material hauled off-site;
- Equipment used;
- Surveyed excavation area boundaries;
- Field monitoring equipment readings and calibration; and
- A record of all formal Site meetings such as health and safety meetings, daily tailgate meetings, and agency meetings.

Mitigation Measures

The lead agency finds that the Initial Study identifies potentially significant effects, but that revisions to the project identified in Table M, as Mitigation Measures, would avoid or minimize the effects such that they would be less than significant.

Table M
Mitigation Measures

Mitigation Measure Number	Mitigation Measure Description
BIO-1	Due to the highly developed nature of the area and lack of suitable habitat at the Site, the proposed project is not expected to have an adverse effect (either direct or indirect) on any species identified as a candidate, sensitive or special status species or result in habitat modifications. Regardless, pre-demolition monitoring activities in the buildings will be conducted to identify any presence of the listed bat species. No more than 30 days prior to construction (including demolition work and tree trimming/removal activities), a qualified biologist will conduct a visual and acoustic preconstruction survey for roosting bats and/or signs (i.e., guano) within 300 feet of suitable bat roosting habitat (i.e., buildings and/or trees). A minimum of one day and one evening will be included in the visual preconstruction survey, which should concentrate on the period when roosting bats are most detectable (i.e., when leaving the roosts between one hour before sunset and two hours after sunset). If bats are not detected, no additional measures are required. ▪ If an active maternity roost is identified, the maternity roost will not be directly disturbed, and construction activities will maintain an appropriate distance (e.g., 300-foot avoidance buffer) until the maternity roost is vacated and juveniles have fledged, as determined by a qualified biologist. The rearing season for native bat species in California is approximately March 1 through August 31. ▪ If non-breeding bat roosts (hibernacula or non-maternity roosts) are found, the individuals shall be safely evicted, under the direction of a qualified biologist, by opening the roosting area to allow airflow through the cavity or other means determined appropriate by a qualified biologist (e.g., installation of one-way doors). If flushing species from a tree roost is required, this shall be done when temperatures are sufficiently warm for bats to exit the roost, because bats do not typically leave their roost daily during winter months. In situations requiring one-way doors, a minimum of 1 week shall pass after doors are installed and temperatures should be sufficiently warm (for winter hibernacula) for bats to exit the roost. This action should allow all bats to leave during the course of 1 week. If a roost needs to be removed and a qualified biologist determines that the use of one-way doors is not necessary,

	the roost shall first be disturbed following the direction of the qualified biologist at dusk to allow bats to escape during the darker hours. Once the bats escape, the roost site shall be removed or the construction disturbance shall occur the next day (i.e., there shall be no less or more than 1 night between initial disturbance and the roost removal).
CUL-1	To prevent effects to cultural resources, tailgate cultural resource training is recommended for all on-site construction crew personnel prior to ground disturbance. In the event any archaeological, historical resources or objects of interest to Native American tribes are uncovered during earth-moving remediation activities, the remediation contractor will cease activity in the area of the find until the discovery can be evaluated by a qualified archaeologist, or a Tribe-appointed Monitor, and appropriate control measures, if necessary, are implemented. Implementation of this procedure during the course of the proposed project would reduce potentially significant effects on archaeological resources to a less than significant level.

References Used:

EPA, 1973. Processes, Procedures and Methods to Control Pollution Resulting from All Construction Activity. Prepared by the United States Environmental Protection Agency, Office of Air and Water Programs.

Parsons, 2004. Supplemental Site Investigation/Health Risk Assessment Report for the Former Pomona MGP Site. Prepared by Parsons for The Gas Company. June 2004.

Parsons, 2016. Draft Removal Action Workplan for the Former Pomona MGP Site prepared by Parsons. Dated October 2016.

ENVIRONMENTAL IMPACT ANALYSIS:

1. Aesthetics

Project Activities Likely to Create an Impact: Building demolition and soil excavation.

Description of Baseline Environmental Conditions:

The Former Pomona MGP Site is located at 148 North Huntington Street, in Pomona, California (Site), as identified in Figure 1. The Site to be remediated occupies approximately 2.6 acres. Commercial properties surround the Site in most directions The Site is bound by Commercial Avenue to the north, Huntington Street to the west, the Southern Pacific Railroad Right-of-Way to the south, and the City of Pomona Police Department Property to the east. Figure 1 presents the Site vicinity map and Figures 2a and 2b present the Assessor's maps of the Site. Residential properties are shown north and northwest of the Site.

A mixture of commercial and residential properties is located north of the Site. Immediately north, the City of Pomona maintains a sanitation, refuse collection, and street maintenance facility. Farther north, storefront businesses are also located on Monterey Avenue. City of Pomona facilities are present immediately east of the Site. The City facilities include police offices, vehicle and gasoline dispensing operations. Numerous commercial properties reside further east of the Site along White Avenue. These include auto repair shops, storefront businesses and churches. The US Postal Service maintains a vehicle maintenance facility on Monterey Avenue. There are additional businesses further east of the Site, along Commercial Avenue. These include an automobile towing company, a limousine service company, and gasoline service stations. The Southern Pacific Railroad Right of Way is located immediately south of the Site. Further south, numerous commercial businesses reside along 2nd Street. These include a pipe supply company, a furniture store, and automobile repair businesses. A vacant property, owned by the City of Pomona Redevelopment Agency, is located immediately west of the Site. At the time of the inspection, storage of debris and piping was observed on this adjacent property. Located further west is a mixture of commercial and residential properties. Along Hamilton Boulevard, businesses include markets and automobile service stations.

The site is paved with concrete and asphalt. A concrete wall separates the Site from Commercial Avenue on the north side of the site. Buildings border the east side of the Site. On the south side, a concrete wall separates railroad tracks from the Site. The west side has a concrete wall separating a vacant property from the Site. All buildings on the Site are proposed to be demolished. Since most of the sturctures on site are delapidated sheds

or shacks, with no architectually significant satructures, demolition of the buildings is not expected to have an adverse effect on the aesthetics of the sorounding properties.

Analysis as to whether or not project activities would:

a. Have a substantial adverse effect on a scenic vista.

Impact Analysis:

The Site is located in a mostly commercial area. During remediation, all work areas will be fenced and covered with a visual barrier to obstruct views from passersby. The proposed excavation area will be backfilled and restored (Parsons, 2016). The Site is not located along or adjacent to a scenic highway, therefore, it is not likely that the proposed project would result in significant or adverse visual or aesthetic impacts upon scenic vistas (Caltrans, 2016). The proposed project would not substantially degrade the existing visual character or quality of the Site or its surroundings, or adversely impact known public or scenic vistas.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

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

Impact Analysis:

The Site is located in a commercial district within the City of Pomona. The closest State designated scenic highway to the Site (State Highway 2) is located approximately 21.5 miles to the north west of the Site (Caltrans, 2016). However, there is a highway that is eligible for designation as a scenic highway that is located approximately 13.5 miles southwest of the Site (Highway 91 from State Route 55 to east of Anaheim city limit). There are no scenic resources including trees, rock outcroppings or historic buildings within a state scenic highway at the Site. As such, the proposed project would result in no significant, adverse impacts upon scenic resources.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

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

Impact Analysis:

Commercial buildings, railroad lines, and residential areas are located in close proximity to the Site. Residential properties are located to the north and northwest of the Site, located across Commercial Avenue and Huntington Street. Property owned by the City of Pomona Police Department is adjacent to the Site on the east side. Pomona Catholic High School is located approximately 1,500 feet to the northeast of the Site. The closest park to the Site is Hamilton Park located approximately 1,000 feet to the northwest of the Site. Because of the temporary nature and the short course of remedial work, there will be no permannet and adverse impact on the overall Site visual character. Sinnce cleansoils will replace impacted material, the overall Site quality is expected to improve upon completion of the remediation.

Although the Site is located within close proximity to a park and a residential community, the current intensive commercial use of the Site indicates that the proposed project activities will not further degrade the visual character or quality of the Site or its surroundings since the current commercial nature of the Site and its surroundings are well established.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

d. Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area.

Impact Analysis:

Implementation of the RAW will be conducted during day time hours (between 7:00 a.m. and 8:00 p.m. per Section 18-305 of the City of Pomona Municipal Code), and no new sources of lightening would be needed. As the project does not involve the intriduction of temporary or permananent structures, there will be no new source of light or glare that would adversely affect views in the surrounding area.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

References Used:

Caltrans, 2016. Caltrans website, (http://earth.dot.ca.gov/) accessed by Michael Girod on September 21, 2016.

Parsons, 2016. Draft Removal Action Workplan for the Former Pomona MGP Site prepared by Parsons. Dated October 2016.

2. Agricultural Resources

Project Activities Likely to Create an Impact: None

Description of Baseline Environmental Conditions:

The Site is not located in an agricultural zone and no agricultural land is in the adjacent areas. The Site is located in an urban area within the City of Pomona. The project Site is not identified as having prime soils, and the Property is not zoned for agricultural use. The Site is currently zoned as commercial by the City of Pomona and the zoning will not change as a result of this project.

Analysis as to whether or not project activities would:

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.

Impact Analysis:

The Site is not located on land classified as farmland (Department of Conservation, 2016). The proposed project will not result in a change of land use classification. No project activities will impact agricultural resources since there are no agricultural activities or resources in the Site vicinity.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

b. Conflict with existing zoning or agriculture use, or Williamson Act contract.

Impact Analysis:

The proposed project will not conflict with the existing zoning or agricultural use of the land. There is no Williamson Act Contract for the Site (Department of Conservation, 2016). No project activities would impact agricultural resources since there are no agricultural activities or resources in the Site vicinity and the zoning will not change as a result of this project.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated

☐ Less Than Significant Impact
☒ No Impact

c. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural uses.

Impact Analysis:

The Site is not located on land characterized as farmland (Department of Conservation, 2016). No project activities will impact agricultural resources since there are no agricultural activities or resources in the Site vicinity.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

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

Impact Analysis:

The proposed project will not rsult in the loss of forest land or conversion of forest land to non-forest use The Site is zoned industrial, located in a highly urbanized area, and does not meet the definition of forest land.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural uses.

Impact Analysis:

The Site is not located on land characterized as farmland (Department of Conservation, 2016). No project activities will impact agricultural resources since there are no agricultural activities or resources in the Site vicinity.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

References Used:

Parsons, 2016. Draft Removal Action Workplan for the Former Pomona MGP Site prepared by Parsons dated October 2016.

California State Department of Conservation Farmland Mapping and Monitoring Program website: http://www.conservation.ca.gov/dlrp/FMMP/Pages/Index.aspx. Accessed by Michael Girod on September 22, 2016.

3. Air Quality

Project Activities Likely to Create an Impact: Demolition, excavation, backfilling, loading, soils into trucks and soils hauling.

Description of Baseline Environmental Conditions:

- The project includes the excavation of impacted soil and vehicular emissions during the implementation of the project. Emissions during the course of the project will originate from the following potential sources: 1) On-site equipment emissions from excavation and construction related activities; 2) Fugitive dust

emissions from material movement and vehicle travel; 3) Construction vehicle trips associated with workers commuting.

The Site is located within the 17,000-square-kilometer (6,600-square-mile) South Coast Air Quality Basin (SCAB). The SCAB encompasses all of Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino Counties. The SCAB is within the jurisdiction of the South Coast Air Quality Management District (SCAQMD).

The Site vicinity is located in an area of typical Mediterranean climate, characterized by warm dry summers and mild winters. Meteorological data from a weather station located in Pomona (Pomona Fairplex) have indicated that temperatures in the Site vicinity ranges from approximately a minimum average of 38.1° Fahrenheit in the winter to approximately a maximum average of 91.1° Fahrenheit in the summer. Very little rainfall or no rainfall at all occurs during the summer months. Rainfall typically occurs from October through April, providing an average annual rainfall of 17 inches (WRCC, 2016).

The annual average wind speed measured at the Ontario Airport is 6.2 miles per hour (mph) that was measured over the 1996-2006 period. The highest average wind speed of 7.3 mph occurs in the month of June, while the lowest average wind speed of 5.2 mph occurs in November and January. The prevailing wind direction is WSW from February to August and W for the rest of the year, according to data obtained at the Ontario Airport, located approximately 8 miles east of the Site (WRCC, 2016).

Air quality in the vicinity of the Site is monitored at the Pomona Fire Station, 924 North Garey Avenue, Pomona CA 91767; approximately 0.75 miles northeast of the Site, by the SCAQMD. The station measures the ambient concentrations of CO, NO_2 and O_3.

Air Quality Thresholds:

The SCAQMD has established threshold standards for criteria pollutant emissions during project construction to assist lead agencies in evaluating a project's impacts on air quality. Based on criteria set forth in the SCAQMD CEQA Air Quality Handbook, a project would have the potential to violate an air quality standard or contribute substantially to an existing violation and result in a significant impact with regard to construction emissions if regional emissions from both direct and indirect sources would exceed the SCAQMD prescribed threshold levels presented in the table below for emissions of volatile organic compounds (VOCs), nitrogen oxides (NO_X), carbon monoxide (CO), sulfur oxides (SO_X), respirable particulate matter (PM_{10}), and fine particulate matter ($PM_{2.5}$).

Table 3-1

Regional Construction Significance Thresholds and Estimated Regional Construction Emissions

Pollutant	Construction Regional Threshold (lbs/day)	Maximum Daily Regional Emissions (lbs/day)
Reactive Organic Compounds (ROC)	75	10
Carbon Monoxide (CO)	550	39
Nitrogen Oxides (NO_X)	100	80
Sulfur Oxides (SO_X)	150	<1
Respirable Particulate Matter (PM_{10})	150	6.5
Fine Particulate Matter ($PM_{2.5}$)	55	4.5

Notes

PM_{10} – particulate matter of diameters 10 micrometers or less

$PM_{2.5}$ – particulate matter of diameters 2.5 micrometers or less

lbs/day – Pounds per day Emission

The SCAQMD has established localized significance threshold (LST) standards for CO, NO_X, PM_{10}, and $PM_{2.5}$ emissions to assist lead agencies in evaluating a project's impacts on localized air quality at sensitive receptor locations in the vicinity of a project site. According to the SCAQMD Final Localized Significance Threshold Methodology, emissions from on-site activities should be compared to the LSTs. The SCAQMD's thresholds are based on the location within the region as well as the distance to the nearest sensitive receptor and the project

site area. The project site area is 2.6 acres (although less than 2 acres would be disturbed) and is located in the Pomona region. The nearest sensitive receptors are located adjacent to the immediately north of the site on the northeastern edge. Therefore, the LSTs for the Pomona region for a 2.6 acre site with sensitive receptors located within 25 meters or less are used in determining localized significance. The SCAQMD LSTs are presented in the table below.

Table 3-2

Localized Construction Significance Thresholds and Estimated Localized Construction Emissions

Pollutant	Construction Localized Significance Threshold (lbs/day)	Maximum Daily Localized Emissions (lbs/day)
Carbon Monoxide (CO)	1,021	37
Nitrogen Oxides (NO_x)	166	71
Respirable Particulate Matter (PM_{10})	7.2	5.9
Fine Particulate Matter ($PM_{2.5}$)	4.6	4.3

Notes

PM_{10} – particulate matter of diameters 10 micrometers or less

$PM_{2.5}$ – particulate matter of diameters 2.5 micrometers or less

lbs/day – Pounds per day Emission

- Rule 401 – Visible Emissions: Sets limits on the visible emissions from sources.
- Rule 402 – Nuisance: A person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.
- Rule 403 – Fugitive Dust: The purpose of this Rule is to reduce the amount of particulate matter entrained in the ambient air as a result of anthropogenic (man-made) fugitive dust sources by requiring actions to prevent, reduce or mitigate fugitive dust emissions.
- Rule 431.2 – Sulfur Content of Liquid Fuels: The purpose of this Rule is to limit the sulfur content in diesel and other liquid fuels for the purpose of both reducing the formation of sulfur oxides and particulates during combustion and to enable the use of add-on control devices for diesel fueled internal combustion engines. The Rule applies to all refiners, importers, and other fuel suppliers such as distributors, marketers and retailers, as well as to users of diesel, low sulfur diesel, and other liquid fuels for stationary source applications in the District. The Rule also affects diesel fuel supplied for mobile source applications. Low sulfur diesel fuel (< 15 parts per million by weight sulfur) should be utilized in all diesel powered construction equipment.
- Rule 1166 – Volatile Organic Compounds from Decontamination of Soil: This rule sets requirements to control the emission of VOC from excavating, grading, handling and treating VOC contaminated soil as a result of leakage from storage or transfer operations, accidental spillage, or other deposition.
- Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities: This rule requires owners and operators of any demolition or renovation activity and the associated disturbance of asbestos-containing materials, any asbestos storage facility, or any active waste disposal site to implement work practice requirements to limit asbestos emissions from building demolition and renovation activities, including the removal and associated disturbance of asbestos-containing materials.

Control Measures:

Control measures to ensure compliance with the requirements of Rules 403, 431.2 and 1166 will be adopted during the implementation of the RAW.

Control of particulate emissions from construction activities is best achieved through the requirements contained in Table 1 to Table 4 of SCAQMD's Rule 403. Table 1 contains measures such as stabilizing soil during cleaning and grubbing activities, pre-watering soils prior to cut and fill activities, stabilizing material while loading and transporting to reduce fugitive dust emissions, and limiting vehicular travel to established unpaved roads (haul routes) and unpaved parking lots, etc. Table 2 identifies dust control measures for large operations such as maintaining soil moisture content at a minimum of 12 percent, conducting watering as necessary to prevent visible emissions from extending more than 100 ft in length in any direction, and applying dust suppressants in sufficient quantity and frequency to maintain a stabilized surface, etc. Table 3 contains contingency control measures for large operations such as applying water to soil not more than 15 minutes prior to moving soil, applying chemical stabilizers prior to wind event, and applying water twice per hour, etc. Table 4 identifies conservation management practices such as maintaining at least 70 percent vegetative cover on vacant portions of the facility, controlling vehicles no more than 15 miles per hour on unpaved roads, and applying material with low silt content on equipment parking areas.

Emissions from construction equipment would be minimized by adopting measures such as the use of low-emission mobile construction equipment, equipment tuning, use of low-sulfur fuel (Rule 431.2), and utilizing existing power sources when feasible.

An approved control plan will be developed according to Appendix A of Rule 1166. A copy of the approved plan will be available on-site during the course of remedial activities. The remedial action will comply with requirements of Rule 1166(c)(1), 1166(c)(2), 1166(c)(3) and 1166(c)(4). Monitoring for VOC emissions will be conducted every 15 minutes during the excavation activities in areas of suspected VOC impact utilizing the test methods in Rule 1166(e).

Analysis as to whether or not project activities would:

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

Impact Analysis:

Compliance with the CEQA regional air quality thresholds and Rules 401, 402, 403, 431.2 and 1166, that are applicable to remediation at this Site, will ensure that there is no conflict or obstruction in the implementation of the overall Air Quality Management Plan (AQMP). The control measures that are required by Rules 403 and 1166, as described above, will ensure that the impact is minimized. In addition, equipment at the Site would operate in compliance with state law, incliuding the California Air Resources Board (CARB) Air Toxics Control Measure (ATCM) that limits heavy-duty diesel motor vehicle idling to five minutes at any location. The temporary emissions from the RAW are quantified in Table 1, Appendix B. Based on the calculations in this table, it is estimated that these emissions will be below the CEQA regional thresholds.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☒ Less Than Significant Impact
☐ No Impact

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

Impact Analysis:

The project would require the use of heavy-duty diesel-fueled construction equipment such as a backhoe, compactor, excavator, loader, and scraper. A large portion of the demolition debris from demolishing the Site cap and buildings on site will be recycled in a local metal or asphalt/concrete recyling facility, as appropraite. The weight of the demlished material is estimated at 1,000 tons, requiring a total of 50 trucks haul-out during the two phases of demolition, estimated at about 25 trucks of demolition material hauled out duringn the entire duration of each phase. Impact of hauling out the demolition debries is insignificant as compared to the impact of excavated soil. As such, the impact analyses is focused on the hauling of excavated soils. Up to 20 trucks per day may be necessary during peak excavation and loading activities with an average of 10 trucks. The maximum daily criteria pollutant emissions are based on the peak daily number of trucks. Trucks will be used throughout the duration of the project to haul out excavated soil and to haul in clean soil to the Site. The trucks hauling soil from the Site will be destined for a local buildingmaterial recycler or for the Soil Safe, Inc. facility, a thermal desorption facility located at 12328 Hibiscus Avenue, Adelanto, California, approximately 56 miles north of the Site.

Detailed analyses of project emissions are presented in Appendix B. As shown in Table 3-1 above, and in Table 1 of Appendix B, the daily pounds (lbs) per day emissions are below the regional California Environmental Quality

Act (CEQA) significance thresholds. These thresholds were developed to protect regional air quality, and compliance with these standards would ensure that regional air quality is protected.

The closest residential receptor is immediately north of the site on the northeastern edge. Air quality standards within the vicinity of this receptor would be protected by complying with Rule 403, and by employing fugitive dust control measures from the CEQA handbook. Further, continuous real-time monitoring of particulate matter at the fence-line will be performed every 15 minutes to provide adequate warning on the potential for particulate hot-spots beyond the fence-line.

Based on the above discussion, remediation activities at the Site would not violate any air quality standard or contribute substantially to an existing or projected air quality violation.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☒ Less Than Significant Impact
☐ No Impact

c. Result in 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).

Impact Analysis:

The SCAB is non-attainment for O_3, PM_{10}, and $PM_{2.5}$.

As shown on Table 1, even on the maximum worst-case day, regional non-attainment pollutant emissions will not exceed the daily regional quantitative thresholds. As shown in Table 1, Appendix B, quantitative thresholds for ozone precursors; i.e., NOx and VOC, will not be exceeded nor will the thresholds for PM_{10} or $PM_{2.5}$.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☒ Less Than Significant Impact
☐ No Impact

d. Expose sensitive receptors to substantial pollutant concentrations.

Impact Analysis:

The Site is a commercial property that is surrounded by commercial and residential properties. The nearest residences are located across the street from the Site on Commercial Avenue and Huntington Street. A review of the historic wind data for Pomona for 1996-2006 period (WRCC, 2016) indicates that the predominant wind direction is from the west south-west, in a direction that is away from the sidewalks and residences. Potential sensitive receptors include schools, playgrounds and childcare centers, long-term health care facilities, rehabilitation centers, convalescent centers, hospitals, retirement homes, and residences. Closest sensitive receptors at this site are private residences.

The SCAQMD has established LSTs to assess air quality impacts to sensitive receptors. The LSTs are applicable to on-site emissions of NOx, CO, PM_{10}, and $PM_{2.5}$. The SCAQMD has established screening criteria that can be used to determine the maximum allowable daily emissions that would satisfy the localized significance thresholds and therefore not cause or contribute to an exceedance of the applicable ambient air quality standards without project-specific dispersion modeling. Detailed analyses of project emissions are presented in Appendix B. As shown above in Table 3-2 and in Appendix B, the pounds (lbs) per day emissions from on-Site sources are below the applicable LSTs. Therefore, the project would not result in localized impacts to sensitive receptors.

During the excavation remediation activities, continuous, real time perimeter monitoring will also be conducted for PAHs and dust. The PAH monitoring will be conducted with high-volume air samplers. Three samplers will be located within the Site perimeter. A MiniRam dust monitor will be used to monitor total particulates. A photo-ionization detector (PID) will be used for total VOC readings on-site. Based on direct reading instruments for VOCs, a VOC suppressant (Biosolve™) will be applied when necessary.

Since the sidewalks and closest residences are not downwind of the prevailing wind direction, impact from the Site is not likely. Further, real time perimeter monitoring and control measures of Rule 403, 431.2 and 1166 will ensure that receptors beyond the Site boundary will not be adversely affected.

Therefore, it is unlikely that operations at the Site would impact sensitive receptors.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☒ Less Than Significant Impact
☐ No Impact

e. Create objectionable odors affecting a substantial number of people.

Impact Analysis:

Although the presence of odorous chemicals such as naphthalene and VOCs in impacted soils is not expected to be significant, project activities may create some odors that may be detectable at the Site perimeter. However, compliance with the control measures outlined in the RAW, and limiting project activities primarily to standard daytime work hours and maintaining emissions below the approved action levels would ensure that any odors created would be temporary and less than significant.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☒ Less Than Significant Impact
☐ No Impact

f. Result in human exposure to Naturally Occurring Asbestos (see also Geology and Soils, f.).

Impact Analysis:

Naturally occurring asbestos is primarily encountered in, and immediately adjacent to areas of ultramafic rocks. The project site is not located in or adjacent to an area of ultramafic rocks, therefore, the proposed project would not result in human exposure to naturally occurring asbestos. The proposed project would have no naturally occurring asbestos-related impact.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

References Used:

Parsons, 2004. Supplemental Site Investigation/Health Risk Assessment Report for the Former Pomona MGP Site. Prepared by Parsons for The Gas Company. June 2004.

Parsons, 2016. Draft Removal Action Workplan for the Former Pomona MGP Site prepared by Parsons. Dated October 2016.

SCAQMD, 1993. CEQA Air Quality Handbook.

South Coast Air Quality Management District, SCAQMD Air Quality Significance Thresholds, http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf?sfvrsn=2, accessed September 2016.

South Coast Air Quality Management District, Final Localized Significance Threshold Methodology, http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds, accessed October 2016.

WRCC, 2016. Western Regional Climatic Center. www.wrcc.dri.edu. Accessed by Michael Girod on September 22, 2016.

ARB, 2016. Air Resources Board. https://www.arb.ca.gov. Accessed by Michael Girod on September 22, 2016

4. Biological Resources

Project Activities Likely to Create an Impact: Excavation, backfilling, loading soils into trucks and soils hauling.

Description of Baseline Environmental Conditions:

The project Site has long been disturbed due to the presence and operation of the former MGP. It is currently located in a commercial area, covered with concrete and asphalt, surrounded by residential community with limited ornamental landscaping. The Site is bordered by residential properties, commercial properties, and paved roadways. The Site is paved or covered by building foundations. The MGP operation is known to have impacted surface soils with MGP residues. Historical and current Site activities have substantially impacted the natural character of the landscape.

On September 27, 2016, Parsons conducted a narrowed search of the Department of Fish and Wildlife's BIOS Database for the Site. The search area was for a mile radius around the subject property versus the 1:24,000 United States Geological Survey Quadrangle Map (USGS Quad; 1 inch = 2,000 feet) which can identify species for a project site. BIOS did not identify animal species that are on listed on the Federal or State status.

There are no documented special-status biological resources within the Site or around the project area. The proposed project Site is not located within or near a Los Angeles County designated Sensitive Ecological Area (SEA), or within or near an adopted Habitat Conservation Plan, Natural Communities Conservation Plan, or other approved local, regional, or state habitat conservation plans. There are no suitable habitats such as wetlands (as defined by Section 404 of the Clean Water Act), migratory pathways, or corridors for fish or other wildlife species or wildlife nursery sites riparian woods, etc. adjacent to or in the Site area. The Site does not provide habitat for 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 US Fish and Wildlife Service. Although a search of the California Natural Diversity Database (CNDDB) revealed no federally or state listed animal or plant species nor have they been observed directly on the project site, three California Species of Concern have been identified in the vicinity of the project site. These include western yellow bat (*Lasiurus xanthinus*) and big free-tailed bat (*Nyctinomops macrotis*), which has been identified within 1 mile of the project site, and western mastiff bat (Eumops *perotis californicus*), which has been found in a non-specific area. The project site does include a minimal number of trees, but does not feature any rock outcrops, cliffs, or water features; thus, the site does not provide suitable roosting or foraging habitat for western yellow bat. Although big free-tailed bat and western mastiff bat are predominantly cliff roosting species, both species may occasionally roost in buildings.

Because, in addition to the excavation, stockpiling, loading, transport and disposal of contaminated soil, the project includes demolition of several buildings, and due to the potential of bats roosting in buildings in the area, it is recommended that a survey of targeted demolition areas be completed for presence of bats. If at the time of the survey any of the above listed species are identified by a qualified biological monitor, mitigation measures associated with protection of the species, as described below, will be implemented.

Mitigation Measure BIO-1: Due to the highly developed nature of the area and lack of suitable habitat at the Site, the proposed project is not expected to have an adverse effect (either direct or indirect) on any species identified as a candidate, sensitive or special status species or result in habitat modifications. Regardless, pre-demolition monitoring activities in the buildings will be conducted to identify any presence of the listed bat species. No more than 30 days prior to construction (including demolition work and tree trimming/removal activities), a qualified biologist will conduct a visual and acoustic preconstruction survey for roosting bats and/or signs (i.e., guano) within 300 feet of suitable bat roosting habitat (i.e., buildings and/or trees). A minimum of one day and one evening will be included in the visual preconstruction survey, which should concentrate on the period when roosting bats are most detectable (i.e., when leaving the roosts between one hour before sunset and two hours after sunset). If bats are not detected, no additional measures are required.

- If an active maternity roost is identified, the maternity roost will not be directly disturbed, and construction activities will maintain an appropriate distance (e.g.,

300-foot avoidance buffer) until the maternity roost is vacated and juveniles have fledged, as determined by a qualified biologist. The rearing season for native bat species in California is approximately March 1 through August 31.

- If non-breeding bat roosts (hibernacula or non-maternity roosts) are found, the individuals shall be safely evicted, under the direction of a qualified biologist, by opening the roosting area to allow airflow through the cavity or other means determined appropriate by a qualified biologist (e.g., installation of one-way doors). If flushing species from a tree roost is required, this shall be done when temperatures are sufficiently warm for bats to exit the roost, because bats do not typically leave their roost daily during winter months. In situations requiring one-way doors, a minimum of 1 week shall pass after doors are installed and temperatures should be sufficiently warm (for winter hibernacula) for bats to exit the roost. This action should allow all bats to leave during the course of 1 week. If a roost needs to be removed and a qualified biologist determines that the use of one-way doors is not necessary, the roost shall first be disturbed following the direction of the qualified biologist at dusk to allow bats to escape during the darker hours. Once the bats escape, the roost site shall be removed or the construction disturbance shall occur the next day (i.e., there shall be no less or more than 1 night between initial disturbance and the roost removal).

Analysis as to whether or not project activities would:

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.

Impact Analysis:

As discussed above, there are no documented special-status biological resources within the Site or around the project area. The Site does not provide habitat for 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 US Fish and Wildlife Service. Although a search of the California Natural Diversity Database (CNDDB) revealed no federally or state listed animal or plant species nor have they been observed directly on the project site, three California Species of Concern have been identified in the vicinity of the project site, which includes the western yellow bat (*Lasiurus xanthinus*), big free-tailed bat (*Nyctinomops macrotis*), and western mastiff bat (Eumops *perotis californicus*). Although big free-tailed bat and western mastiff bat are predominantly cliff roosting species, both species may occasionally roost in buildings. Because the project includes demolition of several buildings, and due to the potential of bats roosting in buildings in the area, the impact is conservatively considered to be potentially significant. Implementation of Mitigation Measure BIO-1 would reduce the impact to less than significant.

Conclusion:

☐ Potentially Significant Impact
☒ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☐ No Impact

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

Impact Analysis:

As discussed above, the proposed project Site is not located within or near a Los Angeles County designated Sensitive Ecological Area (SEA), or within or near an adopted Habitat Conservation Plan, Natural Communities Conservation Plan, or other approved local, regional, or state habitat conservation plans. There are no suitable habitats such as wetlands (as defined by Section 404 of the Clean Water Act), migratory pathways, or corridors for fish or other wildlife species or wildlife nursery sites riparian woods, etc. adjacent to or in the Site area. The Site does not provide habitat for 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 US Fish and Wildlife Service. Therefore, the project would not result in an adverse effect on any riparian habitat or other sensitive natural community and would result in no impacts.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

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.

Impact Analysis:

As discussed above, there are no wetlands (as defined by Section 404 of the Clean Water Act) adjacent to or in the Site area. Therefore, the project would not substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act and would result in no impacts.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

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.

Impact Analysis:

As discussed above, there are no migratory pathways, or corridors for fish or other wildlife species or wildlife nursery sites riparian woods, etc. adjacent to or in the Site area. The Site does not provide habitat for 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 US Fish and Wildlife Service. Therefore, the project would not 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 and would result in no impacts.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

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

Impact Analysis:

The Site is located within the City of Pomona on property owned by the City. There are no trees or other vegetation that will be removed during the remedial effort at the Site. There are no documented special-status biological resources within the Site or around the project area. Therefore, the project would not conflict with local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance, and would result in no impacts.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

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.

Impact Analysis:

The Site does not contain any rare or unique plant life or ecological community and no marine or terrestrial species living in the area. The proposed project Site is not located within or near a Los Angeles County designated Sensitive Ecological Area (SEA), or within or near an adopted Habitat Conservation Plan, Natural Communities Conservation Plan, or other approved local, regional, or state habitat conservation plans. Therefore, the project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan and would result in no impacts.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

References Used:

CDFG, 2016. California Department of Fish and Game Natural Diversity Database. Accessed September 26, 2016

CERES, 2016. Website (http://ceres.ca.gov/wetlands/geo_info/so_cal/so_cal_wetland_index.html). Accessed by Parsons. September 27, 2016.

5. Cultural Resources

Project Activities Likely to Create an Impact: Demolition, excavation, backfilling, loading soils into trucks and soils hauling.

Description of Baseline Environmental Conditions:

The Site is located in an area characterized by mixed industrial, manufacturing, commercial office and residential uses. The Site is bound to the west and east by industrial and commercial properties, and by residential properties to the north. The Site is bound to the south by railroad tracks that support both passenger commuter rail (Metrolink) and heavy freight rail (Union Pacific Railroad, [UPRR]). Various structures within the Site are currently used as office, vehicle storage and servicing facility. The entire site is built or paved. Office and warehouse buildings line almost the entire east, and south perimeters of the Site with a paved open area, which is centrally located among these buildings. Open canopies are located along most of the eastern perimeter of the site, and alongside railroad tracks that border the project site to the south. The entire site is enclosed by a variety of fences, walls and other buildings.

Parsons Corporation performed a cultural resources survey of the Site. The survey included a search of the California Historical Resources Information System and discussions with the City of Pomona, including the review of City General Plan, followed by field survey. The record search and survey indicated that there are no structures within the former MGP Site listed neither on the National Register of Historic Places nor on the California Register of Historic Resources. Additionally, in planning for redevelopment of the Site after remedial work is complete by SoCalGas, the City of Pomona has commissioned a complete cultural studies report for the MGP site. Dudek has prepared the “Cultural Resources Study for 148 North Huntington Street, City of Pomona, Los Angeles County, California, 2016” report for the City of Pomona Water/Wastewatwer Department. This report is presented in Appendix C, and a summary of Dudek’s report is presented below.

The cultural resources study included the following components: (1) a California Historical Resources Information System (CHRIS) records search covering the proposed project site plus a one-half-mile radius at the South Central Coastal Information Center (SCCIC), (2) a review of the California Native American Heritage Commission’s (NAHC’s) Sacred Lands File, (3) outreach with local Native American tribes/groups identified by the NAHC to collect any information they may have concerning cultural resources, (4) a pedestrian survey of the project site for cultural resources, (5) archival and building development research for buildings located within the project site, (6) the evaluation of buildings/structures in consideration of the City of Pomona historic landmark program and the California Register of Historical Resources (CRHR) designation criteria and integrity requirements, and (7) consideration of impacts to historical resources in compliance with the California Environmental Quality Act (CEQA).

The SCCIC records indicate that 12 cultural resources investigations have been conducted within one-half-mile of the project site. None of these studies included the current project site. There are 13 previously recorded cultural

resources located within the one-half-mile search radius. None of these resources fall within the current project site.

The NAHC Sacred Lands File search was completed with negative results. Dudek prepared and sent letters to each of the five persons and entities on the NAHC contact list requesting information about cultural sites and resources in or near the project site. One response was received that requested both archaeological and Native American monitoring.

Nine buildings/structures over 45 years of age were identified within the project site as a result of the pedestrian survey. These resources were recorded and evaluated for historical significance as part of the former Pomona MGP site. As a result of the significance evaluation, the Pomona MGP site was found not eligible for inclusion in the CRHR, nor does it appear to warrant consideration as a City of Pomona Historic Landmark. Therefore, the proposed project will have a less than significant impact on historical resources under CEQA. No further mitigation is required for historical resources.

No archaeological resources were identified within the project site as a result of the CHRIS records search, Native American coordination, or survey. The project activities include demolition of seven structures (which do not include any buildings of historical significance), soil excavation, soil stockpiling (as necessary), and off-site transportation of the contaminated soils and are not expected to create an impact on cultural resources.

Analysis as to whether or not project activities would:

a. Cause a substantial adverse change in the significance of a historical resource as defined in 15064.5.

Impact Analysis:

No significant cultural resources are known to exist within the proposed excavation area. The proposed project would not cause a substantial adverse change in the significance of a historical resource. The proposed project would excavate and remove contaminated soils at the Site, and then restore the Site to near existing conditions. The proposed remediation project would not permanently change the use or character of the Site. The proposed project would not adversely impact any significant structures. Therefore, the proposed project is not expected to cause an adverse impact in the significance of a historical resource.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

b. Cause a substantial adverse change in the significance of an archeological resource pursuant to 15064.5.

Impact Analysis:

As the historical records search indicates, this Site has been highly disturbed since late 1800s. No significant archeological resources are known to exist at the project Site. The potential for encountering unknown subsurface archeological resources is considered low because of the historic disturbed nature of the project Site. As with any ground-disturbing activity, there is always the possibility of encountering unknown buried resources. Therefore, the impact is conservatively considered to be potentially significant. Implementation of Mitigation Measure CUL-1 would reduce the impact to less than significant.

The following mitigation measure will be implemented to minimize potential impacts to unknown archaeological resources during earthwork:

Mitigation Measure CUL-1: To prevent effects to cultural resources, tailgate cultural resource training is recommended for all on-site construction crew personnel prior to ground disturbance. In the event any archaeological, historical resources or objects of interest to Native American tribes are uncovered during earth-moving remediation activities, the remediation contractor will cease activity in the area of the find until the discovery can be evaluated by a qualified archaeologist, or a Tribe-appointed Monitor, and appropriate control measures, if necessary, are implemented. Implementation of this procedure during the course of the proposed project would reduce potentially significant effects on archaeological resources to a less than significant level.

Conclusion:

☐ Potentially Significant Impact

☒ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☐ No Impact

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

Impact Analysis:

No significant paleontological resources are known to exist at the project Site. The project Site has historically been disturbed and the proposed removal actions at the Site would not be expected to destroy any paleontological resources or alter any unique geologic features not previously disturbed.

However, there is the possibility of discovering and adversely impacting unknown paleontological or unique geologic features with ground disturbing activity. The following procedure would be implemented to minimize potential impacts to unknown paleontological resources during earthwork:

In the event unique paleontological resources are uncovered during earth-moving construction activities, the construction contractor will cease activity in the area of the find until the discovery can be evaluated by a qualified Paleontologist, and appropriate treatment measures, if necessary, are implemented.

Implementation of this procedure into the proposed project would reduce potentially significant effects on paleontological resources to a less than significant level.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

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

Impact Analysis:

The closest cemetery to the Site is the Holycross Catholic Cemetery, located within 2 miles south east of the Site. The proposed activities will have no effect upon this cemetery; however, with any ground disturbing activity there is always the possibility of discovering and adversely impacting unknown human remains on the Site. The following procedure would be implemented to minimize potential impacts to unknown human remains:

Consistent with State Health and Safety Code section 7050.5, if human remains are encountered, the County Coroner must be notified immediately. Work shall stop until the County Coroner has made a determination of the origin and disposition of the remains. If the remains are determined to be prehistoric, the Coroner will notify the Native American Heritage commission (NAHC) and proper procedures will be followed pursuant to guidance provided by the NAHC.

Implementation of this procedure into the proposed project would reduce potentially significant effects on human remains to a less than significant level.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

References Used:

Parsons, 2016. Draft Removal Action Workplan for the Former Pomona MGP Site prepared by Parsons dated October 2016.

USFWS, 2016. Wetlands Online Mapper. http://www.fws.gov/nwi/. Accessed by Parsons. September 19, 2016.

6. Geology and Soils

Project Activities Likely to Create an Impact: Excavation, backfilling, loading soils into trucks, and soils hauling.

Description of Baseline Environmental Conditions:

Although no known faults are known to traverse the site, several are located in the region and some may have the potential to produce seismic impacts within the City of Pomona. Local faults located closest to the Site include the San Jose, Walnut Creek, the Central Avenue, and Chino Hill Faults. Regional Faults located farther from the Site include the Whittier, Sierra Madre, Red Hill, Rialto-Colton, Cucamonga, San Jacinto, and San Andreas Faults.

Local Faults:

1. The San Jose Fault is located approximately ¾ mile north of the site, next to Interstate 10. This fault trends southwest to northeast, extending approximately 18 km between the South San Jose Hills on the southwest and the San Gabriel Mountains on the northeast. Its northeastern terminus roughly coincides with the Cucamonga Fault, described below. Approximate magnitudes of earthquakes on this fault are estimated to range from 6.3 to 7.8.

2. The Walnut Creek Fault is located north of the San Jose Fault, approximately 3 miles northwest of the Site, along the northwestern boundary of the San Jose Hills. This fault exists in the subsurface, bisecting Quaternary-age alluvium, where it limits groundwater flow. Since available data indicates the fault does not impact Holocene-age sediments, it is most likely an inactive fault that would have a low potential pose a significant seismic risk.

3. The Central Avenue Fault is located near the northern terminus of the Chino Hills Fault, approximately 2 ¾ miles southeast of the site but may be as close as 1 ¾ miles from the site, according to one source. From this location, the fault trends southeast parallel to the State Route 71 Freeway for approximately 3 ½ miles. Since available data indicates the fault does not impact Holocene-age sediments, it is most likely an inactive fault that would have a low potential pose a significant seismic risk.

4. The Chino Hills Fault borders the Chino Hills, over 1 mile southwest of the Site, but is as close as ¼ mile from the Site. This fault trends southeast from Pomona to the Prado Dam, approximately 13 miles southeast of the Site. Approximate magnitudes of earthquakes on this fault are estimated to range from 6.1 to 7.7.

Regional Faults:

1. The Whittier Fault borders the southwestern boundary of the Chino Hills, where it trends southeast, approximately 10 ½ miles southeast of the Site. The fault extends approximately 25 miles, passing near the cities of Whitter on the northwest to Yorba Linda on the south. Approximate magnitudes of earthquakes on this fault are estimated to range from 6.1 to 8.0.

2. The eastern terminus of the Sierra Madre Fault is located approximately 5 miles north of the Site. At this location, the fault meets the western terminus of the Cucamonga Fault and trends northwest, approximately 34 miles along the southern boundary of the San Gabriel Mountains. Approximate magnitudes of earthquakes on this fault are estimated to range from 6.4 to 8.1.

3. The Red Hill Fault begins in Upland, approximately 7 miles northeast of the Site, and extends northeast, approximately 15 ½ miles near the communities of Alta Loma and Etiwanda. Probable magnitudes of earthquakes occurring on this fault range up to M_W 6.0 to 7.0.

4. The Rialto-Colton Fault is located approximately 26 miles east of the Site, near the intersection of the I10 and I215 Freeways. This fault, which trends northeast for approximately 10 miles, forms one of the boundaries of the
Chino Basin, as described below. This fault is not listed under “Significant Earthquakes and Faults” by the Southern California Earthquake Data Center, which is part of the California Institute of Technology.

5. Located along the boundary of the San Gabriel Mountains, the Cucamonga Fault trends eastward, approximately 19 miles near the communities of Claremont, Upland, and Cucamonga. Approximate magnitudes of earthquakes on this fault are anticipated to range from 6.3 to 8.1.

6. The San Jacinto Fault is located approximately 31 miles east of the Site. This fault runs more than 125 miles, from northwest of El Centro in Imperial County to northwest of San Bernardino, passing through the intersection of Interstates 10 and 215, the City of Loma Linda and the Box Springs Mountains near Riverside, California. Approximate magnitudes of earthquakes on this fault are anticipated to range from 6.3 to 8.5.

7. The San Andreas Fault is located approximately 40 miles east of the Site, abutting the San Bernardino Mountains. The San Andreas Fault extends 600 miles from Eureka in Northern California's Humboldt County south to the Mexican border. Approximate magnitudes of earthquakes on this fault are anticipated to range from 6.3 to 8.5.

8. The Elsinore fault is located to the south, approximately 14 miles from the Site. The fault extends approximately 4 miles west of Lake Mathews and Corona and south into the City of Lake Elsinore in Riverside County. Approximate magnitudes of earthquakes on this fault are anticipated to range from 6.3 to 8.0.

Each of these faults, including the Site, are located within the Peninsular Ranges Physiographic Province, which is characterized by northwest trending mountains and valleys, including the Upper Santa Ana Valley. The Site is located at the western end of this valley, along the western boundary of the Chino Basin and eastern boundary of the Spadra Basin. This basin is, in turn, bordered by the Chino Hills on the southwest, the San Jose Hills on the west, the San Gabriel Mountains on the north, the Rialto-Colton Fault on the northeast, and the La Sierra and Jurupa Hills on the Southeast.

The Chino and San Jose Hills are located in the immediate area, approximately 1 1/2 miles from the Site. Oriented in different directions and separated by the San Jose Creek, the Chino Hills trend northwest, while the San Jose Hills trend northeast. Both are comprised of the same geologic formations, consisting of the Monterey Formation and Glendora Volcanics. The Monterey Formation is the most prevalent and consists of sandstones, conglomerates, and shales. These deposits are highly ductile and display synclines, anticlines, folds, and faults in the San Jose Hills. The Glendora Volcanics is the least prevalent and consists of volcanic conglomerates, basalt flows, and tuff breccias.

Over time, erosion from these and other surrounding highlands has filled the Chino Basin with over 1,000 feet of unconsolidated sediments. With increasing depth, these sediments comprise the Holocene-age Younger Alluvium, the Pleistocene-age Older Alluvium, and the Pliocene-age Fernando Group. Both the Younger and Older Alluvium generally consist of gravel, sand, silt, and clay, which comprise interbedded and discontinuous layers of variable thickness. The Younger Alluvium is only a few feet thick south of the Interstate 10 and would have a low potential to be present at the Site. The Older Alluvium ranges from approximately 200 feet thick in the Site vicinity, 500 feet throughout most of the Basin, and over 1,100 feet thick near the City of Fontana. The Fernando Group consists of thick sequences of semi-consolidated clays, sands, and gravels. With decreasing depth, these sediments become less consolidated, more permeable, and similar in texture and composition to the overlying alluvium.

Soil borings drilled at 822 Commercial Street, approximately 500 west of the Site, encountered alluvial sediments to a depth of 150 feet, the maximum depth explored. These sediments primarily consisted of sandy silt with sand lenses to a depth of 20 feet; discontinuous layers of sand and gravel to 80 feet; and layers of silt, sand, and gravel to a depth of 150 feet. These sediments were reportedly heterogeneous and also included finer deposits, such as clayey sands and silty/clayey layers.

Sandy silts with sands were also prevalent in borings previously drilled at the Site. Discontinuous layers of brown silt, sandy silt, silty sand interbedded with some coarse sand and gravel were prevalent to depths of up to 30 feet. Below this depth, sand with some silty sand and sandy gravels existed to 95 feet, the maximum depth explored in one boring. The sands were brown, medium to coarse grained, and well to poorly graded. Groundwater occurred at depth of 89 feet bgs in the sand/gravel layer.

Analysis as to whether or not project activities would:

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

   - Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault (Refer to Division of Mines and Geology Special Publication 42).

     The Site is not located in an Alquist-Priolo Earthquake Fault Zone, and the project Site would not be subjected to rupture of a known earthquake fault (Department of Conservation, 2015).

- Strong seismic ground shaking.

  The project involves excavation, backfilling and compaction. The excavation depth will vary from the surface to maximum depth of 10 feet bgs. Even though hazards from seismic shaking cannot be eliminated, the soil removal activities will not increase the risk of injuries in case of strong seismic ground shaking. Excavations will be designed and properly shored to prevent damage or loss to existing facilities and ongoing operations of an adjacent railroad.

  Since earthquake-related hazards cannot be avoided in the Southern California region, the project Site could be subjected to seismic shaking and strong ground motion. The proposed project would not involve the construction of structures, and upon completion would not result in any increase in exposure of people to potential impacts from seismic ground shaking. Therefore, the potential impact from seismic ground shaking is less than significant (Parsons, 2009).

- Seismic-related ground failure, including liquefaction.

  Possible effects of seismic activity include slope instability and liquefaction. Topographically, the site is located in an area that is relatively flat; therefore, slope stability should not be a concern. In addition, excavations will be designed and properly shored to prevent damage or loss to existing facilities and ongoing operations of an adjacent railroad.

  Liquefaction is defined as the transformation of a granular material from a solid state into a liquefied state as a consequence of increased pore-water pressures. Liquefaction occurs when saturated fine grained sediments instantaneously loses shear strength and assume the properties of a liquid during seismic activity.

  The unsaturated zone at the Site is approximately 90 feet thick and is comprised of Older Alluvium. Materials comprising the Older Alluvium generally consist of mostly sandy silts and silty sands overlying sands, sandy gravels, and gravelly sands. The sands are generally from fine to coarse grained. Underlying the Older Alluvium are the semi-consolidated clays, sands, and gravels of the Fernando Group. Because the saturated zone is not encountered at the Site until approximately 90 feet bgs and grain size is relatively large, the liquefaction potential at the site is low to very low (SCS Engineers, 2003; USGS, 1985). Additionally, areas where liquefaction has or is likely to occur are not located in the Site vicinity (Department of Conservation, 1999).

- Landslides.

  The topography of the site and the area surrounding the site is relatively flat. As such, the potential for landslides and the potential associated effects of landslides are not an issue at the Site. Additionally, areas where landslides have or are likely to occur are not located in the Site vicinity (Department of Conservation, 1999).

Impact Analysis:

The project Site is not located within an identified liquefaction or landslide hazard area (Department of Conservation, 1999, 2015; SCS Engineers, 2003; USGS, 1985). The proposed project would not increase the risk of seismic-related ground failure, liquefaction, or landslides.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

b. Result in substantial soil erosion or the loss of topsoil.

Impact Analysis:

The purpose of the project is to remediate contaminated soils such that the potential risks associated with these contaminants is eliminated for future residents at the Site. The majority of the proposed excavation will occur in the top 20 feet of soil at the Site. The excavated soil will be hauled out; only some temporary stockpiling on-Site may occur. Clean soil would be backfilled and compacted. The site is not located in a 100-year floodplain as designated by the Federal Emergency Management Agency (FEMA) (FEMA, 2008). Also, the temporary excavation will not result in a substantial increase in flood risk or loss of top soil due to implementation of the Best Management Practices (BMPs) (see the ensuing section), and restoration of the final grade back to its original

surface topography. Due to substantial previous soil disturbance, the remediation is not suspected to be destructive to unique soils.

BMPs will be employed by the contractor during excavation operations to limit the erosion of soil. The BMPs will include dust and stormwater controls measures that limit soil erosion via wind and water. These measures include the wetting of surficial soils to limit the ability of these materials to be brought into aerial suspension via wind. In addition, exposed areas/stockpiles will be wetted and/or covered with plastic to prevent wind driven erosion. For stormwater, BMPs will include sediment traps in catch basins, and silt fence/sandbags/hay rolls around the perimeter of the Site to prevent erosion via run-on or run-off from a storm event. In addition, exposed areas/stockpiles will be covered with plastic to eliminate erosion. All plastic used to cover the excavation area/stockpiles will be anchored.

No significant erosion effects would occur. Loss of topsoil or erosion is not likely to occur.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☒ Less Than Significant Impact
☐ No Impact

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.

Impact Analysis:

The project involves the removal of impacted soil. During the removal action, the excavation will be sloped, benched and/or shored in accordance with City of Pomona permit requirements as well as Occupational Health and Safety (OSHA) requirements for excavations. After the removal action is complete, the Site will be backfilled and compacted. A geotechnical engineer will oversee excavation, shoring, backfill and compaction operations to ensure that the project does not create unstable soil that could result in on- or off-site landslides, lateral spreading, subsidence, liquefaction and/or collapse.

The project Site is not within an area identified as a liquefaction, lateral spreading or landslide hazard area (Department of Conservation, 1999, 2015; SCS Engineers, 2003; USGS, 1985). The City of Pomona has experienced some land subsidence due to groundwater pumping. The Site is not known to have unstable soils (SCS Engineers, 2003). The proposed project would not result in an increased risk to any of these mentioned hazards.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property.

Impact Analysis:

The proposed project would not involve the development of any buildings or other structures, and is not located on expansive soil. Based on soil borings for the site, underlying materials primarily consist of sands (SP), silts (ML), and gravels (GP), which will have little to no expansive characteristics (SCS Engineers, 2003). The site soils will be excavated under the supervision of a qualified geotechnical engineer. There would be no impacts.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

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 water.

Impact Analysis:

The proposed project does not involve the construction of septic tanks or other wastewater disposal systems. If the need for construction of such systems is required, the soil will be classified for suitability; however, no impact is likely because the use of septic tanks or other waste water disposal systems are not planned.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

f. Be located in an area containing naturally occurring asbestos (see also Air Quality, f.).

Impact Analysis:

Naturally occurring asbestos is primarily encountered in areas with ultramafic rocks. There are no ultramafic rocks in the area near the site; therefore, the proposed project would not result in human exposure to naturally occurring asbestos (USGS, 2000).

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

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7. Greenhouse Gas Emissions

Project Activities Likely to Create an Impact: Demolition, excavation, backfilling, loading, soils into trucks and soils hauling.

Description of Baseline Environmental Conditions:

- The project includes the excavation of impacted soil and vehicular emissions during the implementation of the project. Emissions during the course of the project will originate from the following potential sources: 1) On-site equipment emissions from excavation and construction related activities; 2) Construction vehicle trips associated with workers commuting.

Greenhouse gases (GHGs) are those compounds in the Earth's atmosphere that play a critical role in determining temperature near the Earth's surface. More specifically, these gases allow high-frequency shortwave solar radiation to enter the Earth's atmosphere, but retain some of the low frequency infrared energy which is radiated back from the Earth towards space, resulting in a warming of the atmosphere. Not all GHGs possess the same ability to induce climate change; as a result, GHG contributions are commonly quantified in the units of carbon dioxide equivalents (CO_2e). Mass emissions are calculated by converting pollutant specific emissions to CO_2e emissions by applying the proper global warming potential (GWP) value. These GWP ratios are available from the Intergovernmental Panel on Climate Change (IPCC). By applying the GWP ratios, project-related CO_2e emissions can be tabulated in metric tons per year. Typically, the GWP ratio corresponding to the warming potential of carbon dioxide (CO_2) over a 100-year period is used as a baseline. For example, the GWP of CO_2 is 1 (baseline) and the GWP of methane (CH_4) is 25, based on the IPCC Fourth Assessment Report (AR4).

In 2006, the California State Legislature adopted Assembly Bill (AB) 32 (codified in the California Health and Safety Code [HSC], Division 25.5 – California Global Warming Solutions Act of 2006), which focuses on reducing GHG emissions in California to 1990 levels by 2020. HSC Division 25.5 defines GHGs as CO_2, CH_4, nitrous oxide (N_2O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF_6) and represents the first enforceable statewide program to limit emissions of these GHGs from all major industries with penalties for noncompliance. The law further requires that reduction measures be technologically feasible and cost effective. Under HSC Division 25.5, CARB has the primary responsibility for reducing GHG emissions. CARB is required to adopt rules and regulations directing state actions that would achieve GHG emissions reductions equivalent to 1990 statewide levels by 2020.

Greenhouse Gas Thresholds:

The project site is located in the South Coast Air Basin, and air emissions are regulated by the SCAQMD. The SCAQMD is responsible for promoting and improving the air quality of the Basin This is accomplished though air quality monitoring, evaluation, education, implementation of control measures to reduce emissions from stationary sources, permitting and inspection of pollution sources, enforcement of air quality regulations, and by supporting and implementing measures to reduce emissions from motor vehicles. After AB 32 was passed, the SCAQMD formed a Climate Change Committee along with a Greenhouse Gases CEQA Significance Thresholds Working Group and the SoCal Climate Solutions Exchange Technical Advisory Group. On September 5, 2008, the SCAQMD Board approved the SCAQMD Climate Change Policy, which outlines actions the District will take to assist businesses and local governments in implementing climate change measures, decrease the agency's carbon emissions, and provide information to the public regarding climate change. On December 5, 2008, the SCAQMD adopted an annual screening level threshold of 10,000 MTCO2e for industrial projects for which the SCAQMD is the Lead Agency or has discretionary approval. The SCAQMD, in accordance with CEQA Guidelines Section 15064.7, adopted its annual threshold for industrial sources under a public review process as part of stakeholder working group meetings that were open to the public and based on substantial evidence. The intent of the threshold is to capture 90 percent of total emissions from all new or modified industrial and stationary source sector projects subject to a CEQA analysis where the SCAQMD is the lead agency. Data collected by the SCAQMD from its Annual Emissions Reporting (AER) Program indicates that a 90 percent capture rate would cover a substantial portion of future project emissions and would exclude small projects that will in aggregate contribute a relatively small fraction of the cumulative statewide GHG emissions. The SCAQMD estimates that these small projects will in aggregate contribute less than one percent of the future 2050 statewide GHG emissions target.

The CEQA Guidelines (Section 15064.7) defines a threshold of significance as an identifiable quantitative, qualitative or performance level of a particular environmental effect, non-compliance with which means the effect will normally be determined to be significant by the agency and compliance with which means the effect normally will be determined to be less than significant. CEQA leaves the determination of significance to the reasonable discretion of the lead agency and encourages lead agencies to develop and publish thresholds of significance to use in determining the significance of environmental effects. However, as of October 2016, DTSC has not proposed or approved specific numeric thresholds for GHG emissions. Neither CARB nor SCAQMD have adopted numeric thresholds specifically applicable to a remedial project. Thus, for CEQA purposes, DTSC has determined that the appropriate numeric threshold of significance to assess the GHG emissions impacts of a project of this nature with respect to the first Appendix G checklist item is the SCAQMD's industrial source 10,000 $MTCO_2e$ per year threshold. This determination is based on the recommendation from the SCAQMD that industrial projects utilize the 10,000 $MTCO_2e$ per year threshold, which is used by the SCAQMD itself for projects where it is the lead agency under CEQA. With respect to the second checklist item, DTSC has determined that the appropriate threshold of significance is assessing the project's general consistency with the goals of HSC Division 25.5. While HSC Division 25.5 does not prescribe specific project-level measures, the Climate Change Scoping Plan and related policy documents provide strategies for the State to reduce GHG emissions in order to achieve the GHG reduction target.

The thresholds and estimated GHG emissions from the project are presented in the table below. The project would generete GHG emissions over the approximate 6-month duration. Therefore, the GHG emissions represents a temporary and one-time source of GHG emissions.

Table 7-1

Greenhouse Gas Significance Threshold and Estimated Greenhouse Gas Emissions

Pollutant	Threshold ($MTCO_2e$/year)	Total Project GHG Emission Estimate ($MTCO_2e$/year)

Carbon Dioxide Equivalents (CO_2e)	10,000	600

Notes

$MTCO_2e$ – Metric tons of carbon dioxide equivalents

Emissions from construction equipment would be minimized by adopting measures such as the use of low-emission mobile construction equipment, equipment tuning, use of low-sulfur fuel (Rule 431.2), and utilizing existing power sources when feasible.

Analysis as to whether or not project activities would:

a. Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment.

Impact Analysis:

Emissions of GHGs were estimated for the project, as shown above. The emissions were calculated for the equipment and activities described previously (i.e., off-road equipment, haul trucks, worker vehicles) over an approximate 6-month duration. The majority of the GHG emissions would be attributed to the off-road equipment and trucks. Emissions calculations are provided in Appendix B. The estimated GHG emissions would not exceed the significance threshold of 10,000 $MTCO_2e$. Therefore, impacts associated with the project's GHG emissions would be less than significant.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☒ Less Than Significant Impact
☐ No Impact

b. Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs.

Impact Analysis:

The project would require the use of heavy-duty diesel-fueled construction equipment such as a backhoe, compactor, excavator, loader, and scraper. The project would utilize contractors that are in compliance with state regulations that minimize GHG emissions. In 2008 CARB approved the Truck and Bus regulation to reduce emissions from existing diesel vehicles operating in California. CARB has also promulgated emission standards for off-road diesel construction equipment of greater than 25 horsepower (hp) such as bulldozers, loaders, backhoes and forklifts, as well as many other self-propelled off-road diesel vehicles. The regulations adopted by the CARB aim to reduce emissions by encouraging the retirement, replacement, retrofitting or repowering of older, dirtier engines with newer emission controlled models. While these regulations primarily target reductions in criteria air pollutant emission, they have co-benefits of minimizing GHG emissions due to improved engine efficiencies. In addition, equipment at the Site would operate in compliance with state law, incliuding the CARB ATCM that limits heavy-duty diesel motor vehicle idling to five minutes at any location. Consistent with HSC Division 25.5, the project would minimize GHG emissions by using contractors that comply with these CARB requirements. Furthermore, the State has also adopted a Low Carbon Fuel Standard (LCFS), which establishes a statewide goal to reduce the carbon intensity of California's transportation fuels by at least 10 percent by 2020. The project would be consistent with this regulation and would not conflict with implementation of the LCFS, as trucks and worker vehicles would utilize fuels that meet the standards codified in this state law.

As the project would be consistent with these applicable measures that minimize GHG emissions, implementation of the project would not conflict with plans for reducing GHG emissions and impacts relative to this threshold would be less than significant.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☒ Less Than Significant Impact
☐ No Impact

References Used:

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8. Hazards and Hazardous Materials

Project Activities Likely to Create an Impact: Demolition, excavation, backfilling, loading soils into trucks and soils hauling.

Description of Baseline Environmental Conditions:

The project Site is a disturbed property located in an industrial/commercial area of Pomona, California. The Site is completely paved, and there are structures present, which may include remnants of MGP operations. Based on the result of the *Supplemental Site Investigation/Hazardous Risk Assessment* (SSI/HRA) at the project Site completed in June 2004, chemicals of potential concern detected in Site soils include PAH, TPH, VOCs, and heavy metals including lead and arsenic.

At former MGP sites that used coal, tar and/or crude oil feedstock, lampblack is a waste typically found in soil. Chemicals of potential concern found in lampblack are primarily PAHs. Other MGP residues may include spent oxide, feedstock oil, lead, arsenic, TPH, and oil sludge. Spent oxide, used to purify the gas, may have had residues containing cyanides. Feedstock oil and oil sludge (from storage tanks or vaults) may have contained hydrocarbons, PAHs, and aromatic compounds (benzene, toluene, ethylbenzene, and total xylenes [BTEX]). Components of these waste residues were specifically targeted for laboratory analysis in previous investigations at the project Site.

The remediation of the Site includes demolition of existing strucutres on-site, excavation, on-Site handling, transportation and the off-Site treatment and disposal of debris, and impacted materials. Prior to demoliton of the buildings, a complete survey of hazardous materials in buildings will be performed. This survey includes assessment of presence/absence of all typical Universal wastes, including, but, not limited to: asbestos containing materials (ACM), lead-based paint (LBP), polychlorinnated byphenyls (PCB), flourecent lights, and other stored wastes onsite. After the survey is complete and a survey report is prepared by liscenced profesionals, all hazardous materials in buildings will be abated or contained, per the regulatory standards, prior to obtaining a demolition permit. Excavation of impacted materials will only begin after completion of the demolition work. Demolition of the strucutres will be implemented in two separate phases, as depicted on Figure 6.

During the course of excavation, low levels of the above listed contaminants could be released to the air, potentially reaching project personnel the surrounding community and/or the environment. However, air and dust emissions will be monitored during all excavation operations in the exclusion zone and at the perimeters of the Site. Control measures (soil wetting, plastic sheeting, etc.) will also be implemented in order to minimize impact on-Site personnel and the surrounding community. Currently, the entire Site is capped and there is no potential exposure to on-Site workers and/or the community.

Analysis as to whether or not project activities would:

a. Create a significant hazard to the public or the environment throughout the routine transport, use or disposal of hazardous materials.

Impact Analysis:

Contaminated soils will be excavated and removed from the Site following the protocol set forth in the RAW to pose minimal risk. Excavated material will be transported to and treated at a SoCalGas approved facility (i.e., Soil Safe, Inc.) that is properly permitted through the local, state and federal governments. In rare occasions, if Soil Safe, Inc. cannot accept the soils, some non-hazardous soils may potentially be transported to other permitted facilities. The transport of the soils to other facilities is not expected to have any adverse impact on the overall project effect or the environment. All project activities will be conducted in accordance with all federal, state, and local statutes and regulations related to solid waste. It is anticipated that an average of approximately 10 trucks per day of impacted material will be removed from the Site; however up to 20 trucks per day may be necessary

during peak excavation and loading operations. An appropriate transportation route will be selected to minimize and/or mitigate the impacts to the surrounding traffic patterns in the area. The contractor will prepare a contingency plan to identify response actions should an accident occur during transportation of impacted materials to the treatment facility.

During demolition, excavation and loading operations, there is the potential that particulate matter that is generated during on-Site operations could become airborne during periods of high winds, which can occur at the Site during Santa Ana conditions.

The threat from inhalation of dust (and potential odor and organic vapors) during Site operations will be substantially reduced by implementation of odor and dust suppression measures discussed in the Air Quality section of this document, which would include wetting of surface soil, covering exposed soil with plastic sheeting during periods of heavy rain, wind, and inactivity, and ceasing grading during periods of significant wind activity. Dust concentration will be monitored using a dust sampling instrument such as a MiniRAM (or equivalent). A photoionization detector (PID) will be used for VOC air monitoring.

Trucks will travel on approved hauling routes, and the soil in the trucks will be covered to minimize soil dispersion during transport. The hauling contractor to be used will be fully licensed and permitted by the EPA and the State of California Department of Transportation (DOT). All DOT and California Highway Patrol (CHP) safety regulations will be strictly followed. Transportation equipment will be chosen to safely transport the expected volumes of soil, taking into consideration the types of roads to be traveled and their loading capacity. Routine truck maintenance and repairs will be performed on the contractor's premises prior to picking up loads of waste material from the Site. The contractor, on a routine basis, will be responsible for the inspection of all vehicles, trailers, and containers.

The hauling trucks will be equipped to fully cover all soil and debris during transportation. At a minimum, the soil and debris will be tightly covered by a heavy tarp. Decontamination procedures will be followed during truck loading to prevent transfer of contamination off-Site. Implementation of the proposed protocol in the RAW would ensure the proposed project would not create a significant hazard to the public or the environment.

If liquids are encountered and are generated and/or stored on-Site during Site operations, the liquids will be placed in a bermed area that is lined with plastic to prevent impact to the environment. This secondary containment (berms and liners) will prevent a release of contaminants to the environment in the event, however unlikely, that the primary containment (i.e. storage tanks, drums, etc.) fail. To segregate this area, barricades will be setup around its perimeter to prevent impact from on-Site equipment that could create a potential spill.

It is anticipated that the project will result in the removal of all MGP-related impacts such that future land use will be unrestricted.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☒ Less Than Significant Impact
☐ No Impact

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.

Impact Analysis:

Upset conditions and hazards include natural disasters and associated unforeseen emergencies such as fire, equipment failure and vandalism. External upset conditions such as natural disasters should have a similar environmental effect regardless of where they occur during the project. Fire associated with equipment failure or on-Site operations will be controlled by on-Site personnel using fire extinguishers and water. Spill control equipment/devices will be kept on-Site in case an emergency such as equipment/piping failure occurs. In addition to the spill control measures, BMPs will be implemented at the Site to prevent spills and/or stormwater from entering or exiting the Site. This will include the protection of existing stormwater inlets with a combination of sandbags, plastic sheeting, hay bales/rolls and/or sediment traps.

The purpose of the proposed remedy is to remediate the site of soils that exceed the RGs which have been calculated to allow for future unrestricted land use. After implementation of the remedy, the Site would pose a negligible, or *de minimis*, incremental risk above background to on-Site workers or future residents from exposure to PAHs, and that the cumulative risks posed by all chemicals are acceptable and protective of human health and the environment (Parsons, 2016). Post-remediation sampling would be used to confirm concentrations are below

RGs. Following soil removal actions, a post-remediation human health risk assessment (HHRA) of the Site will be performed in accordance with DTSC guidance to verify that the overall health risk to future Site users will be within the acceptable risk range. The proposed project will result in a beneficial long-term impact to the general public and to people potentially working or living at the Site in the future.

To minimize the potential for health hazards, a Site-specific DTSC-approved Health and Safety Plan (HSP) has been developed and will be included in the RAW for implementation during the remediation activities to ensure on-Site worker health and safety. The HSP provides information regarding anticipated Site health and safety concerns, and it establishes policies and procedures adequate to protect Site workers, the public, and the environment from potential Site hazards, both chemical and physical.

The threat from inhalation of dust (and potential odor and organic vapors) by the nearby residents during surface grading will be substantially lessened by implementation of odor and dust suppression measures discussed in the Air Quality section of this document, which include wetting of surface soil, covering exposed soil with plastic sheeting during periods of inactivity, and ceasing earthwork during periods of significant wind activity.

Decontamination procedures established in the HSP will prevent transfer of contamination off-Site or residual contamination from being left on-Site by construction equipment and personnel. Removal actions would be temporary, and implementation of the HSP would substantially minimize the risk of a significant hazard to the public or the environment through upset and accidental conditions involving the release of hazardous materials into the environment. Proposed project activities are not anticipated to create a significant hazard to the public or the environment but to ensure that the Site conditions are protective of future residential uses at the Site.

Trucks will travel on approved hauling routes, and the soil in the trucks will be covered to minimize soil dispersion during transport. The hauling contractor to be used will be fully licensed and permitted by the EPA and the State of California DOT. All DOT and CHP safety regulations will be strictly followed. Transportation equipment will be chosen to safely transport the expected volumes of soil, taking into consideration the types of roads to be traveled and their loading capacity. Routine truck maintenance and repairs will be performed on the contractor's premises prior to picking up loads of waste material from the Site. The contractor, on a routine basis, will be responsible for the inspection, maintenance and repair of all vehicles, trailers, and containers.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☒ Less Than Significant Impact
☐ No Impact

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

Impact Analysis:

Three schools are located in the Site vicinity. These schools include the Lopez Elementary School at 701 South White Avenue, approximately 0.4 miles south of the Site; the Roosevelt Elementary School at 701 North Huntington Street, approximately 0.4 miles north of the Site; and the Lincoln Elementary School at 1200 North Gordon Street, approximately 0.8 miles northeast of the Site. Of these schools, Lincoln Elementary is the only school bordering North Garey Avenue, which comprises a portion of the haul route.

During transportation of excavated soils, the trucks will be covered to minimize soil dispersion during transport, and decontamination procedures will be followed during truck loading to prevent transfer of contamination off-Site. Therefore, the proposed project activities would not create a significant hazard to the public or the environment through the transport of hazardous materials.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☒ Less Than Significant Impact
☐ No Impact

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 public or the environment.

Impact Analysis:

The Site is listed twice on Envirostor, the DTSC's online listing of hazardous materials sites (DTSC, 2016). These listings include "So Cal Gas/Pomona MGP," located at Commercial Avenue & Huntington Street in Pomona, CA 91766, and "Pomona Corporate Yard," located at 148 North Huntington Street, Pomona, CA 91768. For both listings, the site type is "Voluntary Cleanup;" the status is "Inactive – Action Required."

Remedial activities at the Site will remove/remediate COCs to below actionable concentrations, so they pose a negligible risk to human health or the environment. Remedial activities will occur under oversight from the DTSC and must therefore follow removal, treatment, handling, transport, and/or disposal protocol designed to significantly reduce or eliminate the potential for COCs to be released to the surrounding community.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☒ Less Than Significant Impact
☐ No Impact

e. Impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan.

Impact Analysis:

The City of Pomona has an Emergency Operations Plan, dated April 18, 2011. As stated therein, such plans may require "…Organized, phased, and supervised withdrawal, dispersal, or removal of civilians from dangerous or potentially dangerous areas; and their reception and care in safe areas." Implementing this directive requires that thoroughfares, such as streets, roads, and freeways, be free (to the extent possible) of unnecessary traffic. The proposed project activities will be conducted on the Site, and will not require closure of streets, or impede public access.

The transportation plan (see Figures 4 and 5 Transportation Plan Haul Route to Closest Freeway and to Soil Safe of California, respectively) provides the anticipated haul route to be used for transport of soils for off-Site disposal/treatment. This haul route provides the most direct route to the State Route 71 (SR-71) Highway, while limiting (to the extent possible) travel through residential neighborhoods and by schools. The trucks will leave the Site as depicted in Figures 7 and 8 during remedial Phases I and II, respectively. Trucks will exit the Site onto West Commercial Street, turn right on North Hamilton Boulevard, turn left on West Holt Avenue, and travel west to SR-71. The SR-71 Freeway would likely serve as the means for entering and leaving the City of Pomona. In the project vicinity, the SR-71 Freeway can be accessed off West Holt Avenue from North Hamilton Street. To access the Soil Safe, Inc. treatment facility, hauling trucks would travel north on the SR-71 Highway, connect to the northbound 57 (Pomona) Freeway, travel north, connect to Interstate 210 East, travel east to the Interstate 15 North Freeway, take the US-395 exit, continue on Adelanto Road, and turn right on Hibiscus. The facility is located at 12328 Hibiscus Road.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☒ Less Than Significant Impact
☐ No Impact

References Used:

City of Pomona, 2011. City of Pomona Emergency Operations Plan, April 18. http://www.ci.pomona.ca.us/mm/newres/pdf/PomonaDraftEmergencyOperationsPlan.pdf. Accessed by Jeff Muller, Principal Geologist with Parsons. September 28, 2016.

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9. Hydrology and Water Quality

Project Activities Likely to Create an Impact: Site cap demolition, excavation, backfilling, loading soils into trucks and soils hauling.

Description of Baseline Environmental Conditions:

Surface Water

The Site is relatively flat. Surface drainage at the Site is anticipated to flow toward North Huntington and West Commercial Streets, which border the Site. In addition, a storm drain collection sump is located near the facility entrance on North Huntington Street. Other than curbs and gutters, no man-made drainages or culverts are reported or depicted on maps showing portions of the aforementioned streets, which adjoin the Site. The Site is not located within a FEMA defined 100 year floodplain.

Groundwater

The Site is located near the eastern boundary of the Spadra Basin and western boundary of the Chino Basin. Groundwater in this area originates from multiple sources, including underflow along the San Jose Fault, run-off from the San Jose and Chino Hills, precipitation, and inflow from streams, such as the San Jose and San Antonio Creeks. Water originating from these sources flows into or downward through several hundred feet of alluvium and enters an unconfined aquifer, located at approximately 150 feet bgs. Groundwater at this depth then flows southwest at an approximate gradient of 0.02 feet/foot.

These conditions are generally consistent with those observed in the Site vicinity. Borings drilled at the Calsol facility, approximately 500 feet west of the Site, encountered groundwater in two zones; at 90 to 110 feet bgs and at 155 to 160 feet bgs. Groundwater in the shallow zone was attributed to a Perched Aquifer and was consistent with groundwater encountered at 89 feet below the Site. An aquitard comprised of silt and sandy silt existed below the Perched Aquifer at depths of 110 to 120 feet bgs. Groundwater in the deep zone was attributed to the Basal Aquifer. Groundwater reportedly flowed south in the Perched Aquifer and west in the Basal Aquifer.

Groundwater quality in the Site vicinity has been impaired by past industrial and agricultural activities. Groundwater approximately 500 feet west of the Site has been impacted by perchloroethylene (PCE) and trichloroethylene (TCE) originating from the former Calsol facility. Groundwater in the area of Pomona has reportedly been impacted by nitrates from former agricultural activities. Resources obtained from the Chino Basin Watermaster did not indicate wells with impacted groundwater in the Site vicinity. However, it is an anticipated that groundwater with other contaminants attributable to industrial and agricultural activities may be present in the Site vicinity.

Analysis as to whether or not project activities would:

a. Violate any water quality standards or waste discharge requirements.

Impact Analysis:

The proposed removal activities will not generate significant amounts of wastewater that would prevent compliance with water quality standards. The only wastewater expected to be generated on the Site would result from decontamination of field equipment, and will be disposed of in accordance with procedures set forth in the RAW. The proposed project will not have a potential to violate water quality standards or waste discharge requirements. Shallow perched groundwater was encountered during the course of drilling at a depth of 89 feet, well below the remedial excavation depth (10 feet). Therefore, encounter and collection and handling of perched water are not considered as part of the scope of this project.

Surface water run-on and run-off may occur during a rain event. The remediation contractor will control all run-on/run-off from the project site through stormwater best management practices (BMPs). These include the following: sediment traps in catch basins, and silt fence/sandbags/hay rolls around the perimeter of the Site to prevent erosion via run-on or run-off from a storm event. In addition, exposed areas/stockpiles will be covered with plastic to eliminate erosion. All plastic used to cover the excavation area/stockpiles will be anchored. In addition, the roadway in and around the project Site will be cleaned with a street sweeper on a regular basis or as directed by the City of Pomona and/or the Los Angeles Regional Water Quality Control Board.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated

☒ Less Than Significant Impact
☐ No Impact

b. Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficient 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).

Impact Analysis:

The proposed removal activities will not involve recharging or withdrawal of any groundwater, nor will it result in a net deficiency in the aquifer volume in the project area. The water that will be used on-Site for dust suppression will be from the closest fire hydrant to the Site. Removal of the impacted soil will not deplete the groundwater supply. There would be no impacts to groundwater level or aquifer volume.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

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.

Impact Analysis:

The proposed project would not alter the course of any nearby streams or rivers, and would not result in on-Site or off-Site erosion. Upon project completion, the Site surface topography would be restored to near existing conditions. Due to pending redevelopment plans, the Site will not be capped with concrete and/or asphalt

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

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.

Impact Analysis:

The proposed project would not alter the course of any nearby streams or rivers, and would not result in an increase in run-on or run-off from the Site. Upon project completion, the Site surface topography would be restored to near existing conditions, allowing for on-Site containment of area run-off during the course of storm events in order to prevent significant changes to existing drainage patterns.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

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

Impact Analysis:

The proposed project would not result in an increase in impervious surface area at the Site. Upon project completion, the Site surface topography would be restored to near existing conditions, and would not result in any significant changes to existing drainage patterns. The proposed project would not result in increased runoff water that would impact existing storm water drainage facilities because the Site is currently completely paved and constructed upon.

The proposed project includes excavation of soils to depths of approximately 10 feet bgs, which could give rise to accumulation of water in excavated areas. In the event of rain, work will cease and to the extent practicable, excavated areas and materials will be covered to prevent off-Site transport of contaminated soils or water. In addition, if large volumes of stormwater are collected in the excavation bottom, the water will be pumped into temporary on-Site storage tanks for sampling and eventual discharge to an existing stormwater or industrial sewer, depending upon the results of the samples.

A Storm Water Pollution Prevention Plan (SWPPP) will be developed and implemented as part of the proposed project. In compliance with the California State Water Resources Control Board Construction General Permit Section A requirements, the SWPPP will list BMPs that will be implemented to protect storm water runoff and the placement of BMPs. The SWPPP will also contain a visual monitoring program. BMPs that will be employed as part of the proposed project include, but are not limited to:

- In the event the proposed project takes place during the wet season, the weather forecast will be monitored daily. During the days that significant rain is forecasted, remediation activities will be stopped.
- Soil will be loaded and transported frequently to minimize on-Site stockpiling. Soil stockpiles, if any, will be covered with heavy plastic sheets and secured with sand bags during rainfall so as to prevent any potential run-off.
- The boundary of the remediation area will be properly bermed so that no run-on enters the excavated area and no runoff leaves the excavated area.
- Water collected within excavated areas will be pumped and stored in appropriate containers for proper profiling and disposal/recycling at an approved destination, or, if quantities are relatively small, used for dust suppression.
- The excavation will be conducted in small sections so that any exposed impacted area can be covered immediately in order to keep water away from the excavation.
- The proper procedures will be used to ensure that the wet soil (mud) will not stick to tires of trucks used for soil transportation. The procedure may include placing plastic sheeting at the loading area; and
- Plastic sheeting will be used extensively to make sure that the area of excavation is protected from rain during off hours and during significant rain events. All external peripheries of the Site will be bermed in order to minimize run-in and run-off and prevent migration of impacted material.

With the SWPPP in place and implementation of storm water BMPs, impacts on water quality due to stormwater runoff would be minimized to a less than significant level.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☒ Less Than Significant Impact
☐ No Impact

f. Otherwise substantially degrade water quality.

Impact Analysis:

The proposed project would not result in any other effects that could substantially degrade water quality. No significant impacts to water quality are expected to occur.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

g. Place within a 100-flood hazard area structures which would impede or redirect flood flows.

Impact Analysis:

The Site is not located in a 100-year flood zone and would not involve the construction of structures (FEMA, 2008). Thus, the proposed project would not impede or redirect flood flows from on-site activities.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

h. 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.

Impact Analysis:

There will be no construction of levees, dams, or other structures that could possibly result in flooding. All work will be contained on the Site and proper measures will be implemented to ensure that flooding does not occur as a result of the proposed project. There would be no increase in the risk of flooding because the Site will be restored to the existing topographic conditions.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

i. Inundation by sieche, tsunami or mudflow.

Impact Analysis:

The project Site is located in Pomona, California, which is not an area subject to mudflows, tsunamis, or sieche hazards.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

References Used:

California Department of Toxic Substances Control (DTSC), 2014. California Environmental Quality Act, Initial Study, Removal Action Workplan for Calsol Site. February 18, 2014.

California Department of Toxic Substances Control (DTSC), 2016. Envirostor Listing for Calsol, Inc. http://www.envirostor.dtsc.ca.gov/public/profile_report.asp?global_id=60000137. Accessed by Jeff Muller, Principal Geologist with Parsons. September 29, 2016.

Chino Basin Watermaster, 2003. Contaminant Distribution and Basin Boundary Maps. http://www.cbwm.org/docs/boundmaps/. Accessed by Jeff Muller, Principal Geologist with Parsons. September 29, 2016.

Wildermuth Environmental, Inc., 2011. Delineation of Groundwater Contamination Plumes and Point Sources of Concern. http://www.cbwm.org/docs/engdocs/maps/2012_GroundwaterContaminationPlumes.pdf. Accessed by Jeff Muller, Principal Geologist with Parsons. September 29, 2016.

10. Land Use and Planning

Project Activities Likely to Create an Impact: The proposed project planning will lead to unrestricted land use.

Description of Baseline Environmental Conditions:

The subject property, including the remediation Site, is zoned *M-1* for light industrial use. The surrounding land is zoned *R-2* for low density multiple-family residential use. Land use bordering the Site includes paved roadways; business/office buildings; and a railroad right of way to the south of the Site. Medium density residential areas are located within 200 feet northwest of the Site. Sensitive receptors include several schools within a 1-mile radius of the Site.In addition, the Site is not located within or near a habitat conservation plan or natural community conservation plan. Therefore, no further analysis is deemed necessary.

Analysis as to whether or not project activities would:

a. 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.

Impact Analysis:

The proposed remedy would remediate the site of soils that exceed site-specific RGs. Regardless of the current zoning or existing land use, the RGs have been calculated to allow for future unrestricted land use, which could include industrial, commercial, or residential uses. Nonetheless, the project does not include rezoning or redevelopment of the Site. This project will replace impacted soils with clean soils. The Site is currently owned by the City of Pomona, and any future plans for the Site are at this time speculative and would be subject to separate approvals which may necesitate further environmental documentation, The Site will remain consistent with zoning and City land use plans. Adjacent land uses would temporarily experience noise from construction activities; however, the proposed project would not interfere with business operations of any adjacent properties, and would not block access to any other properties. The proposed project will not change the land use pattern, scale, or character of the general Site vicinity.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

b. Conflict with any applicable habitat conservation plan or natural community conservation plan.

Impact Analysis:

The Site is not located within an open space or habitat rehabilitation area (Pomona, 2014). The proposed project would not conflict with an approved local, regional or state habitat or natural community conservation plan.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

References Used:

Pomona Tomorrow, City of Pomona 2014 General Plan Update. (Website, http://www.ci.pomona.ca.us/mm/comdev/plan/pdf/General_Plan.pdf). Accessed by Dr. Shala Craig, Program Manager with Parsons, September 30, 2016.

11. Mineral Resources

Project Activities Likely to Create an Impact: Soil excavation and backfilling.

Description of Baseline Environmental Conditions:

Federal, state and local agencies regulate or maintain documents regarding the presence of mineral resources. The State Geologist, California Geological Survey, and the State Mining and Geology Board (SMGB) provide assistance and direction with regard to mineral resources. The SMGB uses a classification system that divides land into four Mineral Resource Zones (MRZ) based on quantity and significance of mineral resources. The Site is located within a highly developed urbanized commercial/industrial and residential area. There are no mineral resources in the area that would be of value to the region. The proposed remediation would only result in removal of the top 4 to 10 feet of disturbed and impacted soil; therefore, this remedial project will not be affecting any known mineral resources. This Site is not located within or in the vicinity of oil fields or mines, and it is not designated as containing mineral resources by the City of Pomona General Plan or Zoning maps. The Site is also not located in close proximity to a MRZ or formerly active oil drilling area. Therefore, no further analysis is deemed necessary.

Analysis as to whether or not project activities would:

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.

Impact Analysis:

The project Site is not located within an area identified as having a known valuable mineral resource. The proposed project will not change the land use of the Site; thus, there would be no change in the existing availability of mineral resources at the Site. Project activities are aimed solely at removing impacted soils at the Site. Therefore, the proposed project would not result in the loss of availability of a known, valuable mineral resource.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

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.

Impact Analysis:

No known mineral resource was identified at the Site during the review of available documentation for the Site. The proposed project involves the removal of relatively shallow contaminated soils for treatment, and would not result in the loss of a locally important mineral resource recovery site.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

References Used:

Parsons, 2016. Draft Removal Action Workplan for the Former Pomona MGP Site prepared by Parsons dated October 2016.

State of California, the Resources Agency, Department of Conservation, California Geological Survey, California, Principal Mineral – Producing Localities. http://www.conservation.ca.gov/cgs/geologic_resources/mineral_production/Documents/YellowMap.pdf. Accessed by Dr. Shala Craig, Senior Project Manager with Parsons, September 29, 2016.

12. Noise

Project Activities Likely to Create an Impact: Heavy equipment for excavation, demolition, site restoration and material hauling. Drilling rigs for installation of post remediation soil gas probes.

Description of Baseline Environmental Conditions:

The subject property is located in an area that is zoned for light industrial (M-1) use. The area situated immediately adjacent to the north and west sides of the subject property are zoned for low density multiple family residential use (R-2). A railroad easement borders the Site to the south; the eastern boundary of the site borders other city buildings, and on the north and west, the site is bound by the intersection of west Commercial Street and north Huntington Street. The closest main traffic route around the site is Hamilton Boulevard. According to the City of Pomona Average Daily Traffic (ADT) Count Map, North Hamilton Boulevard has 5,400 daily trips in both directions within a 24-hour period. First Street parallels the south side of the railroad tracks and has an ADT of 1,400 trips. The railroad tracks are used by Metrolink, Amtrak, and Union Pacific trains. It is estimated that approximately 81 trains pass by the Site on a daily basis (ACE Web Page). The Site is characterized by vehicle and train noise.

The federal government has no standards or regulations applicable to offsite noise levels from the Site. Onsite noise levels are regulated, in a sense, through the Occupational Health and Safety Act of 1970 (OSHA). The

noise exposure level of workers is regulated at 90 dBA, over an 8-hour work shift to protect hearing (29 Code of Federal Regulations [CFR] 1910.95). Areas with sound levels greater than 85 dBA will be posted as high noise level areas and hearing protection will be required. The Project will implement a hearing conservation program for applicable employees and maintain sound levels less than 90 dBA.

Two state laws apply to the Project that address occupational noise exposure and vehicle noise. The California Department of Industrial Relations, Division of Occupational Safety and Health enforces California Occupational Safety and Health Administration (Cal-OSHA) regulations, which are the same as the federal OSHA regulations described above. The regulations are contained in 8 California Code of Regulations (CCR), General Industrial Safety Orders, Article 105, Control of Noise Exposure, Sections 5095, et seq.

Noise limits for highway vehicles are regulated under the California Vehicle Code, Sections 23130 and

The limits are enforceable on the highways by the California Highway Patrol and the County Sheriff's office. The California State Planning Law (California Government Code Section 65302(f)) requires that cities prepare and adopt a General Plan to guide community change. The General Plan must include a Noise Element to address noise concerns in the community. The City of Pomona General Plan contains a Noise Element (referred to herein as Noise Plan) that provides goals and policies to minimize interference from noise sources and promote a comprehensive long range means of achieving acceptable noise levels in the City of Pomona (City of Pomona, 2014). The Noise Plan guides the implementation of the regulatory provisions provided in the City's code of ordinances (Noise Ordinance). This section summarizes the local noise goals, policies and provisions from the City's Noise Plan and Noise Ordinance that are applicable to the Site.

The City of Pomona's Noise Plan is intended to ensure compliance with state requirements and promote a comprehensive, long range program of achieving acceptable noise levels throughout the City of Pomona. The City's Noise Ordinance provides restrictions for allowable noise levels in specific designated noise zones. As stated in Section 14.9-4 of the City of Pomona Noise Ordinance, the assigned noise zones are:

- Noise Zone 1—Single-family residential properties
- Noise Zone 2—Multiple-family residential properties
- Noise Zone 3—Commercial properties
- Noise Zone 4—Industrial properties
- Noise Zone 5—High traffic corridors

Section 14.9-5 of the City of Pomona Noise Ordinance establishes acceptable exterior noise standards for each noise zone, using the "A" weighted decibel scale (dBA), shown in Appendix D

The Noise Plan aims to prevent new noise conflicts by addressing the needs of noise sensitive land uses and by establishing appropriate noise emission standards. The main focus is protecting nearby noise sensitive land uses which may include residential areas, schools, child care facilities, convalescent centers, and retirement homes from potential noise conflicts (City of Pomona, 2014). The dominant sources of noise throughout the City are transportation related activities, including freight traffic on the railroad that serves the Pomona South Station, and, to a lesser extent on the Pomona North Line, which can produce significant noise levels. For the Pomona South line that runs adjacent to the Site, noise may already exceed City standards within 150 feet of the railway line (City of Pomona, 2014). Per the City's Municipal Code, acceptable exterior noise standards that should apply within the designated noise zones are presented below.

Table 12-1

City of Pomona Municipal Code Acceptable Exterior Noise Standards

Noise Zone	Time Interval	Allowable Noise Level
1	10:00 p.m. to 7:00 a.m.	50 dB(A)
	7:00 a.m. to 10:00 p.m.	60 dB(A)
2	10:00 p.m. to 7:00 a.m.	50 dB(A)
	7:00 a.m. to 10:00 p.m.	65 dB(A)
3	10:00 p.m. to 7:00 a.m.	60 dB(A)
	7:00 a.m. to 10:00 p.m.	65 dB(A)
4	Any	70 dB(A)

5	Any	70 dB(A)

Analysis as to whether or not project activities would result in:

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.

a. Impact Analysis: Noise generated at the project Site as a result of the proposed remedial activities is expected to be minimal with temporary periods of greatest noise impact during demolition and excavation, which will temporarily exceed the City's noise threshold of 70 dBA for Noise Zone 4 areas (i.e., M-1 Industrial Properties).

Equipment and vehicles for project activities will result in a temporary increase in the ambient noise levels in the project vicinity. However, this increase in the noise level will be less than significant in relation to the background level of noise created by the traffic on surrounding roads and neighboring train tracks, industrial sites and auto repair/dismantling operations. The closest residential properties are estimated to be at least 200 feet away from any Site remedial activities. Project construction, without the use of sound walls, blankets, or other noise control measures, may result in noise levels at about 85 dBA at the residential receptors when excavation is near the residential receptors. However, the remedial work will result in removal of impacted material and allow future unrestricted use by the public, and is considered in the best interest of the public, specifically, for the future planned use by the City of Pomona for the Site.

Noise monitoring will be conducted with a sound level meter as presented in the project RAW. The sound level meter will satisfy the requirements pertinent for type 2 meters in the American National Standards Institute (ANSI) specifications for sound level meters. Monitoring will occur within the exclusion zone and at the perimeters of the exclusion zone, decontamination zone, support zone and the Site. Monitoring frequencies will be determined according to the type and location of the operations. If necessary, a noise control plan will be provided that identifies noise sources, sensitive receptors, and monitoring methods and provides worker hearing protection requirements and control methods to be implemented. Manufacturer specifications will be reviewed for noise levels produced by any on-site equipment. If necessary, muffler or alternative equipment may be selected to minimize noise levels.

Noise monitoring will be conducted in the exclusion zone and at the perimeter of the Site using a hand held noise meter. The meter will comply with all local, state, federal and ANSI guidelines and standards for sound level meters. All personnel in the exclusion zone will wear hearing protections (i.e., ear plugs, muffs, etc).

Control measures for noise reduction such as sound walls and blankets would be incorporated into the proposed project on as needed basis to ensure compliance with the City of Pomona noise ordinance and would be rated to achieve the necessary reduction in noise levels. It is not anticipated that the project will generate excessive noise that would be inconsistent with the surrounding land use, which is primarily industrial. However, baseline noise from the freeway, railway, and roadways will be a concern as the primary sources of the current noise levels, which may be aggravated by the temporary remediation activities. Incorporation of the control measures will reduce the likelihood that noise generated at the Site will be a concern to the surrounding community. The proposed project would be conducted in compliance with the City of Pomona's noise ordinance and the allowed hours for construction operations.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☒ Less Than Significant Impact
☐ No Impact

b. Exposure of persons to or generation of excessive groundbourne vibration or groundbourne noise levels.

Impact Analysis:

The proposed project would require the removal of the cap that covers the Site, and any remaining subsurface MGP structures as well as the removal of MGP related impacted soil. The soil removal activities do not expose persons to excessive ground-transmitted vibrations or noise levels. As such, no significant vibration or ground transmitted noise impacts are anticipated to result from the proposed project. The proposed remediation activities are not expected to generate excessive ground transmitted vibration or noise levels because the demolition of concrete foundations is a minor component of the entire project, the majority being the removal and transportation of impacted soil.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

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

Impact Analysis:

The project Site is located in an area that will likely experience an increase in noise levels over time; however, noise created by the project would not result in a permanent increase in ambient noise levels. The duration of the project will be short and activities limited to excavation, removal, and transportation of impacted soil. Limited demolition will occur on an as needed basis, in the event that subsurface structures are encountered.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

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

Impact Analysis:

The project Site is zoned for industrial use, and is located in a industrial area. The proposed project is anticipated to result in a temporary increase in the ambient noise level in the project vicinity, as discussed above. However, it is unlikely that noise impacts from the Site would exceed the current ambient noise levels of the project area, taking into consideration the background noise of the freeways, railway, and roads located adjacent to the Site and the use of noise control measures including sound walls and blankets. Potential receptors include on-site workers, railway patrons, pedestrians and vehicle drivers in the vicinity of the Site. Site workers will be required to wear hearing protection in the exclusion zone and in any areas where noise levels are measured at 80 dBA or above. Noise control measures will be implemented to ensure that the project noise will be minimized to less than significant levels.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☒ Less Than Significant Impact
☐ No Impact

References Used:

Alameda Corridor-East (ACE) Construction Authority Web Page, Fact Sheet – Pomona At-Grade Crossing Safety Improvement Project, http://theaceproject.org/pomona_crossing_imp.php

Average Daily Traffic Volumes, City of Pomona 2013

Bolt, Beranek and Newman, 1971. Noise from Construction Equipment, and Operations, Building Equipment and Home Appliances, prepared for the USEPA, December 1971.

Federal High Way Administration, 2006. Construction Noise Handbook; https://www.fhwa.dot.gov/environment/noise/construction_noise/handbook/, accessed September 2016

City of Pomona Municipal Code, Subpart A - General Ordnance, Chapter 18 Environment, Article VII Noise and Vibration Control Noise, Sections 18-310 and 18-311.

City of Pomona, Pomona General Plan, March 2014

California Department of Transportation, Transportation- and Construction-Induced Vibration Guidance Manual, June 2004

13. Population and Housing

Project Activities Likely to Create an Impact: None.

Description of Baseline Environmental Conditions:

The Site is currently zoned for commercial use, and is surrounded by commercial and residential zoned properties, and public roadways. The proposed project activities will involve approximately 10 to 15 remedial employees – a temporary (six month) increase in employment, and it is expected that the surrounding regional employment base can easily provided the needed workers. As stated above in *9. Land Use and Planning*, future plans for the Site are speculative at this time. Therefore, the project would not induce population growth in the area directly (from to the short-term remediation) or indirectly (long-term use of the Site). No improvements to the existing transportation network or other infrastructure would occur as part of the proposed project. Therefore, no further analysis of this resource is deemed necessary.

Analysis as to whether or not project activities would:

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

Impact Analysis:

The proposed project includes the remediation of soil on Site, which is located on private property. The project will result in improved Site conditions but does not include plans for redevelopment of the Site.

The remediation project will not result in increased population growth as the project will not result in the creation of new homes, businesses, or other improvements to infrastructure, such as extension of existing roads. The proposed project involves removal of contaminated soil from the Site. Since the project does not involve housing and has no effect on population, no impacts to housing and population would occur.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

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

Impact Analysis:

The proposed project will occur on private property and will not affect the surrounding community. In addition, this project is not a redevelopment project; thus, there will be no change in the population distribution in the area as a result of this project.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

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

Impact Analysis:

The proposed project will occur on private property and not affect the surrounding community. No housing units will be removed or replaced as part of the soil removal activities associated with this project.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

References Used:

Parsons, 2016. Removal Action Workplan for the Former Pomona MGP Site, Southern California Gas Company October 2016.

Pomona Tomorrow, City of Pomona 2014 General Plan Update. (Website, http://www.ci.pomona.ca.us/mm/comdev/plan/pdf/General_Plan.pdf)

14. Public Services

Project Activities Likely to Create an Impact: None.

Description of Baseline Environmental Conditions:

The project site is located within an area developed for residential and commercial uses. Currently the area is services by all major public services, including fire protection, policing, transportation, medical and emergency response, etc. The proposed remediation project will comply with all applicable public building and safety codes. The remedial activities proposed in the RAW will be performed within the confined of the Site. With the exception of on-site and off-site hauling of materials, which will conducted to and from the site along major roadways. These activities are expected to pose no significant burden on local public services or affect schools and parks. The site is serviced by all public utilities; no alterations to public utilities infrastructure will be necessary in support of this project. No impacts will occur as a result of the proposed project; therefore, no further analysis is deemed necessary.

Analysis as to whether or not project activities would:

a. Result in substantial adverse physical impacts associated with the provision of new or physically altered government 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 following public services:

- Fire protection - The project will be limited to soil removal activities and will not require, involve or result in any change for the need of or availability of Fire Protection.
- Police protection - The project will be limited to soil removal activities and will not require, involve or result in any change for the need of or availability of Police Protection. The Site is currently secured via chain link fencing and block walls and is protected by a 24-hour security service.
- Schools - The project activities will not require, involve or result in a change for the need of or availability of public services. The remedial activities are limited to the Site and its boundaries. Air and dust emissions will be monitored during all excavation operations in the exclusion zone and at the perimeters of the Site. Control measures (soil wetting, plastic sheeting, etc.) will be implemented if emissions are near or exceed exposure limits. The air emissions produced during the soil removal activities are anticipated to be below the permissible threshold limits.
- Parks - The project activities will not require, involve or result in a change for the need of or availability of Park Services.
- Other public facilities - The project activities will not require, involve or result in a change for the need of or availability of Other Public Services.

Impact Analysis:

The remediation project activities would be carried out over a period of approximately 6 months, and all activities will be confined to the industrial/commercial area in which it is located.

With adequate notice given to local emergency services, the proposed project would not adversely impact emergency services in the area. The project location will not require police protection. Although several schools are located within close proximity to the Site, Pomona Catholic High School and Roosevelt Elementary School, the transportation route will avoid these sensitive receptors, and remain on the local roads within the industrial area of the Site. The SR-71 Highway is close to the Site and will be the route that the trucks will take to leave the City of Pomona. The close proximity of this freeway minimizes the communities exposure to project activities since a limited amount of time will be spent on local routes. The closest park to the Site is Hamilton Park, located within ½ mile southeast of the Site, separated by Hamilton Boulevard to the east of the park. Although the Site is located within close proximity to the park, which is surrounded by residential communities, the intensive industrial

and commercial use of the properties to the south of the park indicate that the proposed project activities will not substantially impact the surrounding communities, to a greater extent than have the current industrial and commercial practices.

The Site is located in a well-established industrial area. The proposed remediation activities would not increase population or require additional support of public services. Thus, there would be no adverse impact to emergency or other public services as a result of the proposed project.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

References Used:

Parsons, 2016. Removal Action Workplan for the Former Pomona MGP Site, Southern California Gas Company October 2016.

15. Recreation

Project Activities Likely to Create an Impact: None.

Description of Baseline Environmental Conditions:

Project activities will not impact any existing parks or recreational facilities, and does not include construction or modification of recreational facilities. The proposed project would not increase population or result in the need for new housing that would increase the use of neighborhood or regional parks or other recreational facilities in the area. Project activities will not require public parks or recreation areas to be constructed or expanded. The proposed project does not provide recreational uses and would not substantially deteriorate current conditions at the Site. Therefore, no further analysis of this resource is deemed necessary.

Analysis as to whether or not project activities would:

a. 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.

Impact Analysis:

The proposed project is limited to excavation and transportation of soils from the Site. No activities are planned that would increase the use of recreational facilities. Recreational facilities are not present at the Site, and the proposed project would not result in an increased use of recreational facilities or require construction or expansion of any recreational facilities. Thus, the proposed project would not adversely impact recreational resources or opportunities.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

b. Include recreational facilities or require construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

Impact Analysis:

The proposed project does not include any construction or expansion of recreational facilities. No impacts to recreational facilities would occur.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

References Used:

Parsons, 2016. Removal Action Workplan for the Former Pomona MGP Site, Southern California Gas Company October 2016.

16. Transportation and Traffic

Project Activities Likely to Create an Impact: Equipment mobilization and materials transportation.

Description of Baseline Environmental Conditions:

Arterial streets carry through traffic and connect to the state highway system with restricted access to abutting properties. They are designed to have the highest traffic carrying capacity in the roadway system with the highest speeds and limited interference with traffic flow by driveways. Collector streets are intended to serve as intermediate routes to handle traffic between local streets and streets of higher classification. Collector streets also provide access to abutting property and are two lanes in width. Collector streets may handle some localized through traffic from one local street to another; however, their primary purpose is not to provide for through traffic but to connect the local street system to the arterial network.

The project Site is located approximately 3/4 miles south of Interstate-10 and 1.4 miles east of State Route 71 (SR-71). The major arterial in close vicinity to the Site is West Holt Avenue to the north. West 1st Street to the south is a collector. North White Avenue to the east is a minor collector. North Hamilton Boulevard to the west is a collector. A railroad is located south of the Site and north of West 1st Street.

The transportation plan (see Figures 4 and 5) provides the potential haul routes to be used for transport of soils to off-site disposal/treatment facilities. The hauling routes primarily traverse commercial/industrial areas and travel only short distances through residential neighborhoods adjoining the Site. Trucks will exit the Site onto West Commercial Street, turn right on North Hamilton Boulevard, turn left on West Holt Avenue, and travel west to SR-71. The SR-71 Freeway would likely serve as the means for entering and leaving the City of Pomona. In the project vicinity, the SR-71 Freeway can be accessed off West Holt Avenue from North Hamilton Street. To access the Soil Safe, Inc. treatment facility, hauling trucks would travel north on the SR-71 Highway, connect to the northbound 57 (Pomona) Freeway, travel north, connect to Interstate 210 East, travel east to the Interstate 15 North Freeway, take the US-395 exit, continue on Adelanto Road, and turn right on Hibiscus at 12328 Hibiscus Road.

Analysis as to whether or not project activities would:

a. Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections).

Impact Analysis:

Trucks will be used throughout the duration of the project to haul out excavated soil and to haul in clean soil to the Site. The trucks hauling soil from the Site will be destined for the Soil Safe, Inc. facility, a thermal desorption facility located at 12328 Hibiscus Avenue, Adelanto, California, approximately 56 miles north of the Site. Approximately 1 3/4 miles of the total 56 miles traveled to Soil Safe, Inc. will be on local streets.

The proposed project duration is estimated at 6 months with an average of 20 working days per month. For each day during removal operations, an average of 10 truck-trips will be required to complete the removal action. This is a conservative estimate based on the approximate tonage of excavated materials inn each phase. Maximum air emission calculations were based on the anticipated maximum number of 20 trucks in any single day. For remedial projects, soil haul in and haul out usually strives to avoid peak hours and is conducted between 10 AM and 3 PM

Project activities may create an increase in traffic in the area surrounding the project site as a result of the workers and transport vehicles traveling to and from the Site. It is anticipated that the relatively small increase in traffic related to this project is not considered significant and due to its extremely temporary nature will not have an adverse effect on the existing load or the capacity of the street system.

There are no street closures planned as part of the proposed project. Traffic control flagmen would be present to assist the trucks in navigating to and from the Site to facilitate safe traffic flow. The project area supports regular truck traffic, and the daily increased number of truck trips that would result from the proposed project would not create a substantial increase in traffic, as most of the traveling time will be spent on Interstates and Highways.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☒ Less Than Significant Impact
☐ No Impact

b. Exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highway.

Impact Analysis:

Although the project would result in a minor increase in truck traffic in the project vicinity, this increase in traffic would be temporary. Implementation of a truck hauling route plan, which would be submitted for approval by the City of Pomona, would reduce potential traffic-related impacts to a level of less than significant. Truck hauling and staging activities on-Site will be limited to normal work hours (Work hours: Monday - Friday, between 7:00 am and 7:00 pm and Saturdays between 8:00 am and 5:00 pm). The anticipated amount of truck traffic would be an average of approximately 10 trucks per day during excavation and backfill operations. Usually, contaminated soils haul out takes place after peak hours and between 10 AM and 3PM.

Since the majority of the work will be conducted in an industrial area, and the distance to the freeways are minimal, there will likely be no substantial impacts on traffic in the surrounding community. In addition, due to the temporary nature of the project, the increase in traffic will not significantly impact the level of service standard established by the county congestion management agency for designated roads or highways.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☒ Less Than Significant Impact
☐ No Impact

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

Impact Analysis:

The project does not involve the change in design feature of any street intersections. In addition, the transportation route for vehicular traffic will avoid unsafe design features in existing roads (e.g., sharp curves or dangerous intersections). A flagman will direct traffic in and out of the Site during soil removal activities. It is anticipated that no hazards would occur or that the project would substantially increase hazards due to existing design features.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

d. Result in inadequate emergency access.

Impact Analysis:

The proposed project would allow for adequate emergency access to the Site and adjacent properties at all times. The necessary permits will be obtained from the City of Pomona, including a hauling route permit. All necessary safety best management practices will be implemented in compliance with the permits. Traffic control flagmen would be present to assist the trucks in navigating to and from the Site safely, in addition to ensuring that the trucks do not cause unnecessary traffic or block streets from use.

The proposed project will be conducted in a manner that would not interfere with the use of any designated emergency evacuation route, or impair implementation of an adopted emergency response plan or emergency evacuation plan.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated

☐ Less Than Significant Impact
☒ No Impact

e. Result in inadequate parking capacity.

Impact Analysis:

Construction vehicle staging would take place on the project Site, and would not require any traffic lane closures. Adequate parking for project employees would be available on the project Site, or along adjacent streets. The proposed project would not displace any existing parking, or otherwise result in inadequate parking capacity because all project activities will be occurring within the project boundaries.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

f. Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks).

Impact Analysis:

The activities associated with this project will include the removal of impacted soil and backfill with clean material. This project will be temporary and would not impact any adopted policies, plans, or programs supporting alternative transportation.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

References Used:

Pomona Tomorrow, City of Pomona 2014 General Plan Update. (Website, http://www.ci.pomona.ca.us/mm/comdev/plan/pdf/General_Plan.pdf)

17. Utilities and Service Systems

Project Activities Likely to Create an Impact: Soil excavation and decontamination fluids.

Description of Baseline Environmental Conditions:

Utility and Related Services are provided by the public and private entities described below:

1. The City of Pomona Public Works Department (PWD) provides water and sewer services for the project Site. The PWD pumps 70% of its water from four groundwater basins consisting of the Chino Basin, Pomona Basin, Claremont Heights Basin, and Spadra Basin. Approximately 23% of the City's water is obtained from the Metropolitan Water District (MWD) (23%) and 7% is obtained from the San Antonio and Evey Canyon watersheds. The MWD water is imported from Northern California Rivers via the State Water Project. Water from the San Antonio and Evey Canyon watersheds passes through the Pedley Water Treatment Plant prior to distribution. The Los Angeles County Sanitation Districts (LACSD) provides the PWD with waste water treatment and primarily uses the Pomona Water Reclamation Plant (PWRP) to perform this service and to treat sewage effluent from the cities of Claremont and La Verne. Recycled water totaling approximately 5,595 acre-feet per year is also used by commercial and government facilities.

2. Trash services in the City of Pomona are provided by government and private entities. The PWD services single-family residences, duplexes, triplexes, and some fourplexes with trash, recycling, and special pickup services. Franchise commercial waste hauling companies provide the remaining fourplexes, apartments with five or more units, and commercial, industrial, and government sites with trash disposal and recycling. Franchise waste haulers furnishing the City with waste disposal services include Athens Services (888-336-6100), Burrtec Waste Industries, Inc. (909-620-1353), Valley Vista Services (800-442-6454), and Waste

Management (800-774-0222). Since the Site is a government facility owned and operated by the City of Pomona, it would receive trash services from a commercial waste hauler.

Trash from the City, including the Site, would be disposed at multiple facilities. The El Sobrante and Olinda facilities are open to the public and commercial haulers disposing municipal solid waste. The Fontana Refuse Disposal Site (Mid-Valley Sanitary Landfill) is accessible to the public, only, not to commercial haulers. By 2013, trash arriving at the Puente Hills Landfill was to be delivered by rail to the Eagle Mountain Landfill in Riverside County and/or to the Mesquite Regional Landfill in Imperial County.

3. Electrical services in the City of Pomona are provided by Southern California Edison (SCE). SCE electrical power generators operate on coal, hydroelectric, natural gas, nuclear, renewable energy, and unspecified sources.

Analysis as to whether or not project activities would:

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

Impact Analysis:

Wastewater volumes generated during project activities would be minimal to none. In general, with the exception of dust and odor control measures, the excavation will be kept dry in order to minimize any potential wastewater generated. Wastewater generated as a result of decontaminating equipment would be temporarily placed in 55-gallon, DOT-approved drums. The drums would be labeled, and the contents would be directly hauled off-Site for treatment, or used to moisten soil to be transported off-site, for dust abatement purposes. Containment and transportation of all wastewater to an appropriate treatment facility will be in compliance with the wastewater treatment requirements of the Los Angeles Regional Water Quality Control Board.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

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.

Impact Analysis:

The only wastewater on-Site is expected to be generated as a result of decontaminating equipment and for dust abatement. Wastewater volumes generated during project activities would be minimal to none. The project will not require or result in the construction of new water or wastewater treatment facilities, or expansion of existing facilities.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

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.

Impact Analysis:

The project will not generate significant amount of storm water, and no additional drainage facilities or expansion of existing facilities would be required.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

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

Impact Analysis:

The contractor will use the nearest metered fire hydrant at the Site to provide water for the removal activities. Following the completion of proposed remediation activities, the project Site would be filled to grade with clean, compacted soil. The proposed project would not require new or expanded water entitlements.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

e. Result in determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the projects projected demand in addition to the providers existing commitments.

Impact Analysis:

Wastewater volumes generated during project activities would be minimal to none. The proposed project would not impact the wastewater treatment provider.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

f. Be served by a landfill with sufficient permitted capacity to accommodate the projects solid waste disposal needs.

Impact Analysis:

All the waste generated on-Site will be transported to an appropriate permitted facility by licensed transporters. The majority of non-hazardous waste from the Site will be transported to Soil Safe, Inc. (SSI), a non-hazardous soil recycling facility located at 12328 Hybiscus Avenue, Adelanto, California. SSI is permitted through the Regional Water Quality Control Board, Lahontan Region (Board Order No. 6-91-935A1 WDID No. 6B369107002); County of San Bernardino Air Pollution Control District (File B002924/C0022925); County of San Bernardino Environmental Health Services; and the City of Adelanto to treat and recycle impacted soil. SSI treats the soils via thermal desorption and recycles the material as general backfill material or for use in road base or asphalt mix. In rare occasions, if SSI cannot accept the soils, some non-hazardous soils may potentially be transported to other permitted facilities. The transport of the soils to other facilities is not expected to have any adverse impact on the overall project effect or the environment. Project activities will be conducted in accordance with applicable federal, state, and local statutes and regulations related to solid waste. Any hazardous waste encountered at the Site will be transported to the Waste Management Kettleman Hills Facility located at 35251 Old Skyline Road in Kettleman City, CA. Each of these permitted facilities has a sufficient permitted capacity to accommodate the project solid waste disposal needs. Anticipated total volume of excavated soils for the two phases of the project is 10,000 CYs, with each phase requiring approximately 100 days, and 5,000 CYs of contaminated soil haul-out/clena soil haul-in. Average daily truck numbers are anticipated at 10 trucks a day, with a maximum occasional 20 trucks/day possible haul.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☒ Less Than Significant Impact
☒ No Impact

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

Impact Analysis:

All the waste generated on-Site will be transported to the permitted facilities by licensed transporters. The non-hazardous waste from the Site will be transported to SSI, a non-hazardous soil recycling facility located at 12328 Hybiscus Avenue, Adelanto, California. SSI is permitted through the RWQCB, Lahontan Region (Board Order No. 6-91-935A1 WDID No. 6B369107002); County of San Bernardino Air Pollution Control District (File

B002924/C0022925); County of San Bernardino Environmental Health Services; and the City of Adelanto to operate and recycle the treated soil. Project activities will be conducted in accordance with applicable federal, state, and local statutes and regulations related to solid waste.

Conclusion:

☐ Potentially Significant Impact
☐ Potentially Significant Unless Mitigated
☐ Less Than Significant Impact
☒ No Impact

References Used:

City of Pomona Public Utilities. http://www.ci.pomona.ca.us/index.php/residents/public-utilities. Accessed by Jeff Muller, Principal Geologist with Parsons, October 1, 2016.

Pomona Tomorrow, City of Pomona 2014 General Plan Update. (Website, http://www.ci.pomona.ca.us/mm/comdev/plan/pdf/General_Plan.pdf). Accessed by Jeff Muller, Principal Geologist with Parsons, September 30, 2016.

Southern California Edison, 2015. Power Content Label. https://www.sce.com/wps/wcm/connect/b602f427-2762-4915-a043-b220e4a3e64e/2015_PCL_Final.pdf?MOD=AJPERES. Accessed by Jeff Muller, Principal Geologist with Parsons, October 1, 2016.

Finding Of De Minimis Impact To Fish, Wildlife And Habitat (Optional)[1]

The following provides substantial evidence as to why the project will have **no potential for adverse effect** on the listed resources as defined by section 711.2 of the Fish and Game Code:

a. Riparian land, rivers, streams, watercourse, and wetlands under state and federal jurisdiction.

Discussion:

The Site is located in an industrial/commercial area of the City of Pomona, with some residential homes. It is capped with asphalt, concrete or existing buildings. The Site is not a suitable habitat for any sensitive species. As such, there is no riparian land at the Site or in the surrounding area and no natural community exists at the Site.

The project will not interfere substantially with the movement of any native resident, migratory fish, wildlife species nor will it interfere with an established native resident, migratory wildlife corridor or impede the use of native wildlife nursery sites. The soil removal activities will not have an adverse effect on federally protected wetlands as defined in Section 404 of the Clean Water Act. There are no wetlands, streams, water course and/or rivers at the Site or in the vicinity of the Site that will be interrupted, diverted or filled as part of project operations. Prior to the removal action, the storm drains adjacent to the Site will be protected by placing sandbags around the exterior as berms to prevent an unauthorized release to the stormdrain and potentially navigable waters of the United States of America. In addition, a waterproof cover will be placed over the storm drains. As such, the project will have no substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies and regulations or by the State of California Department of Fish and Game or the United States Fish and Wildlife Service.

The Site is on a City of Pomona owned by the City. There are no trees or other vegetation that will be removed during the remedial effort at the Site. The Site does not contain any rare or unique plant life or ecological community and no marine or terrestrial species living in the area. Therefore, the project does not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

Finding:

☒ No potential for adverse effect.

[1] Complete only if a Finding of De Minimis Impact to fish, wildlife and habitat is proposed in lieu of payment of the Department of Fish and Game Notice of Determination filing fee required pursuant to section 711.4 of the Fish and Game Code. A finding of "no potential adverse effect" must be made to satisfy the requirements for the Finding of De Minimis Impact as required by title 14, California Code of Regulations, section 753.5.

b. Native and non-native plant life and the soil required to sustain habitat for fish and wildlife.

Discussion:

See discussion above.

Finding:

☒ No potential for adverse effect.

c. Rare and unique plant life and ecological community's dependent on plant life.

Discussion:

See discussion above.

Finding:

☒ No potential for adverse effect.

d. Listed threatened and endangered plant and animals and the habitat in which they are believed to reside.

Discussion:

See discussion above.

Finding:

☒ No potential for adverse effect.

e. All species of plant or animals as listed as protected or identified for special management in the Fish and Game Code, the Public Resources Code, the Water Code, or regulation adopted there under.

Discussion:

See discussion above.

Finding:

☒ No potential for adverse effect.

f. All marine and terrestrial species subject to the jurisdiction of the Department of Fish and Game and the ecological communities in which they reside.

Discussion:

See discussion above.

Finding:

☒ No potential for adverse effect.

g. All air and water resources the degradation of which will individually or cumulatively result in a loss of biological diversity among the plants and animals residing in that air and water.

Discussion:

See discussion above.

Finding:

☒ No potential for adverse effect.

<u>Mandatory Findings of Significance</u>

Based on evidence provided in this Initial Study, DTSC makes the following findings:

a. The project ☐ has ☒ does not 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.

b. The project ☐ has ☒ does not have impacts that are individually limited but cumulatively considerable. "Cumulatively considerable" means that the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.

c. The project ☐ has ☒ does not have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly.

Determination of Appropriate Environmental Document:

Based on evidence provided in this Initial Study, DTSC makes the following determination:

☐ The proposed project COULD NOT HAVE a significant effect on the environment. A **Negative Declaration** will be prepared.

☒ The proposed project COULD HAVE a significant effect on the environment. However, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A **Mitigated Negative Declaration** will be prepared.

☐ The proposed project MAY HAVE a significant effect on the environment. An **Environmental Impact Report** is required.

☐ The proposed project MAY HAVE a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An **Environmental Impact Report** is required, but it must analyze only the effects that remain to be addressed.

☐ The proposed project COULD HAVE a significant effect on the environment. However, all potentially significant effects (a) have been analyzed adequately in an earlier Environmental Impact Report or Negative Declaration pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier Environmental Impact Report or Negative Declaration, including revisions or mitigation measures that are imposed upon the proposed project. Therefore, nothing further is required.

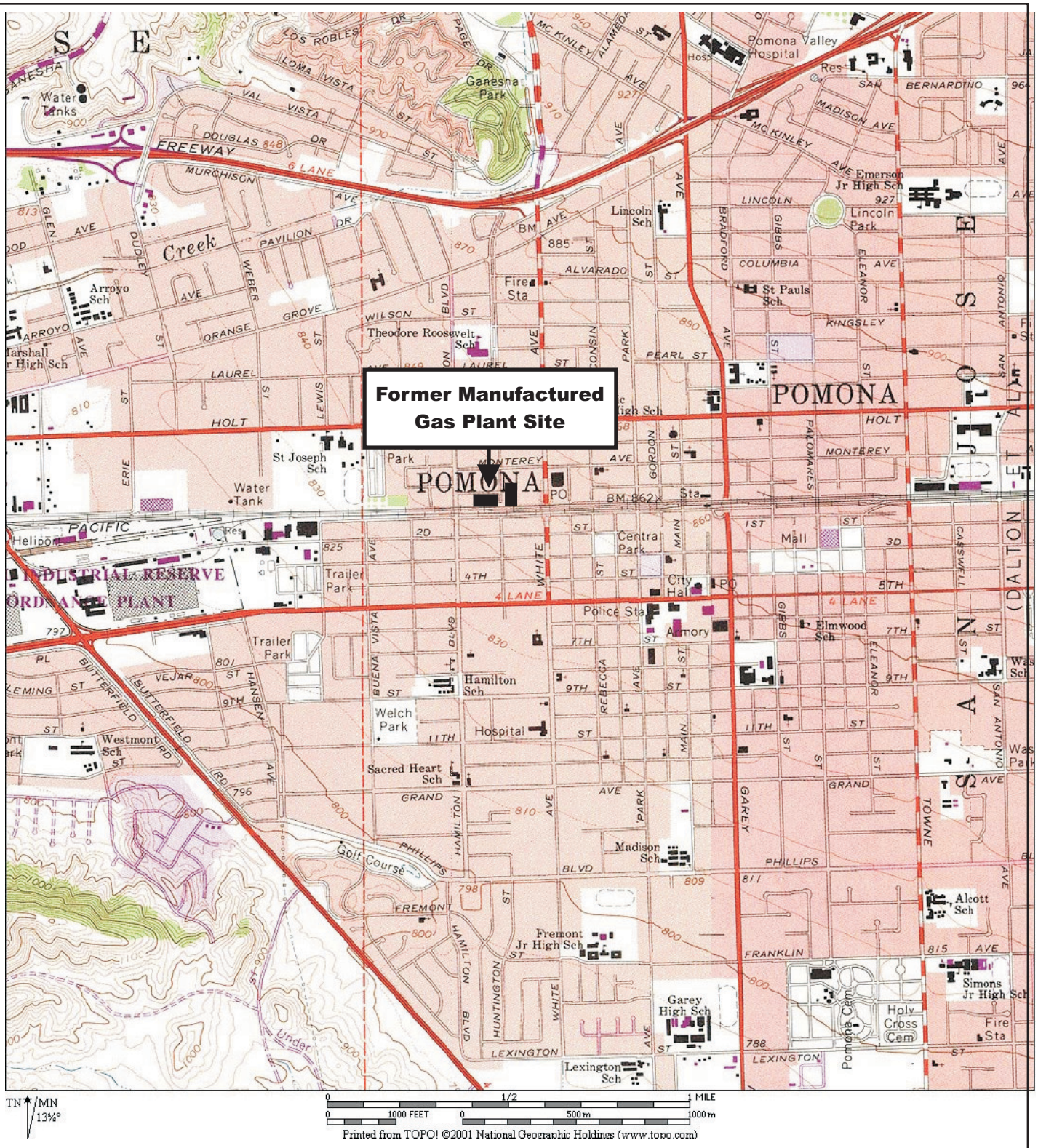
Certification:

I hereby certify that the statements furnished above and in the attached exhibits, present the data and information required for this initial study evaluation to the best of my ability and that the facts, statements and information presented are true and correct to the best of my knowledge and belief.

Preparer's Signature		Date
Tedd Yargeau	Project Manager	(714) 484-5476
Preparer's Name	Preparer's Title	Phone #

Branch or Unit Chief Signature		Date
Peter Garcia	Branch Chief, Southern California Cleanup Operations Branch-Cypress Office	(714) 484-5459
Branch or Unit Chief Name	Branch or Unit Chief Title	Phone #

APPENDIX A
FIGURES AND MAPS



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Reference: TOPO!© 2001 National Geographic Holdings (www.topo.com)

Figure 1

Site Vicinity Map

Former Pomona MGP Site
Pomona, CA

PARSONS

Pasadena, California

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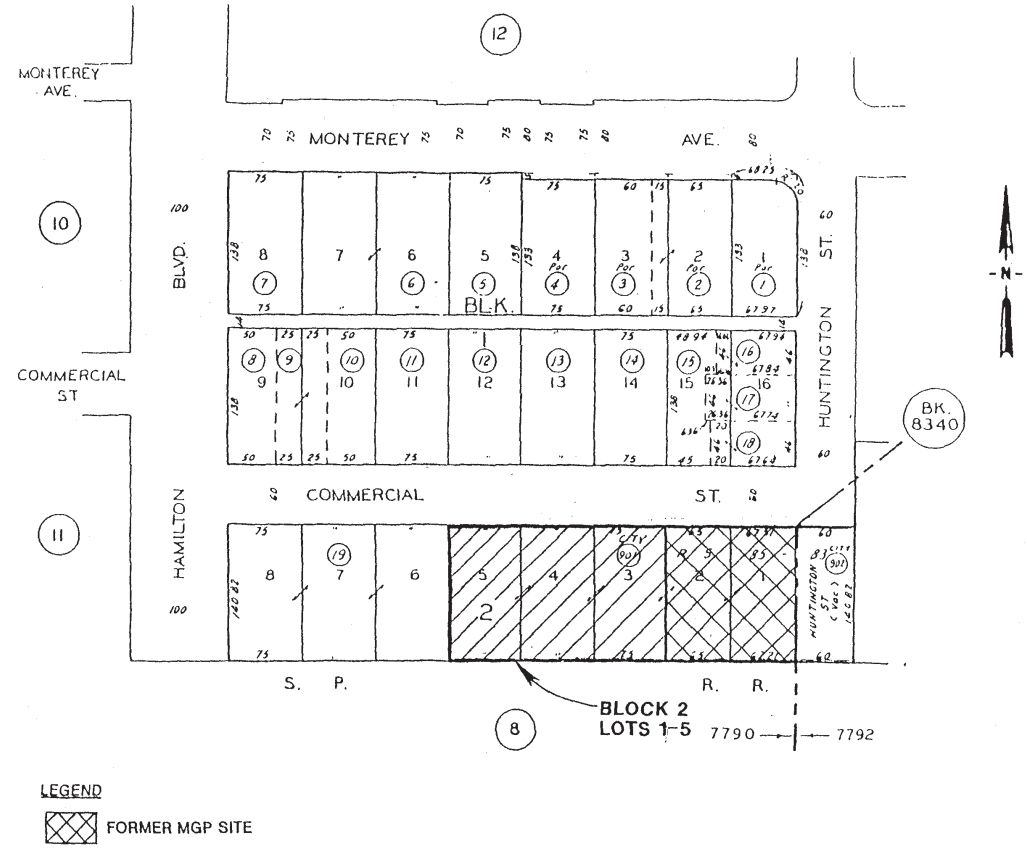

Reference: County of Los Angeles Assessor's Map, Block 3

Source: www.netronline.com/frameset.asp?page=California

Figure 2a

Assessor's Map
Pomona Site

West of Huntington Street
Pomona, CA

PARSONS

Pasadena, California

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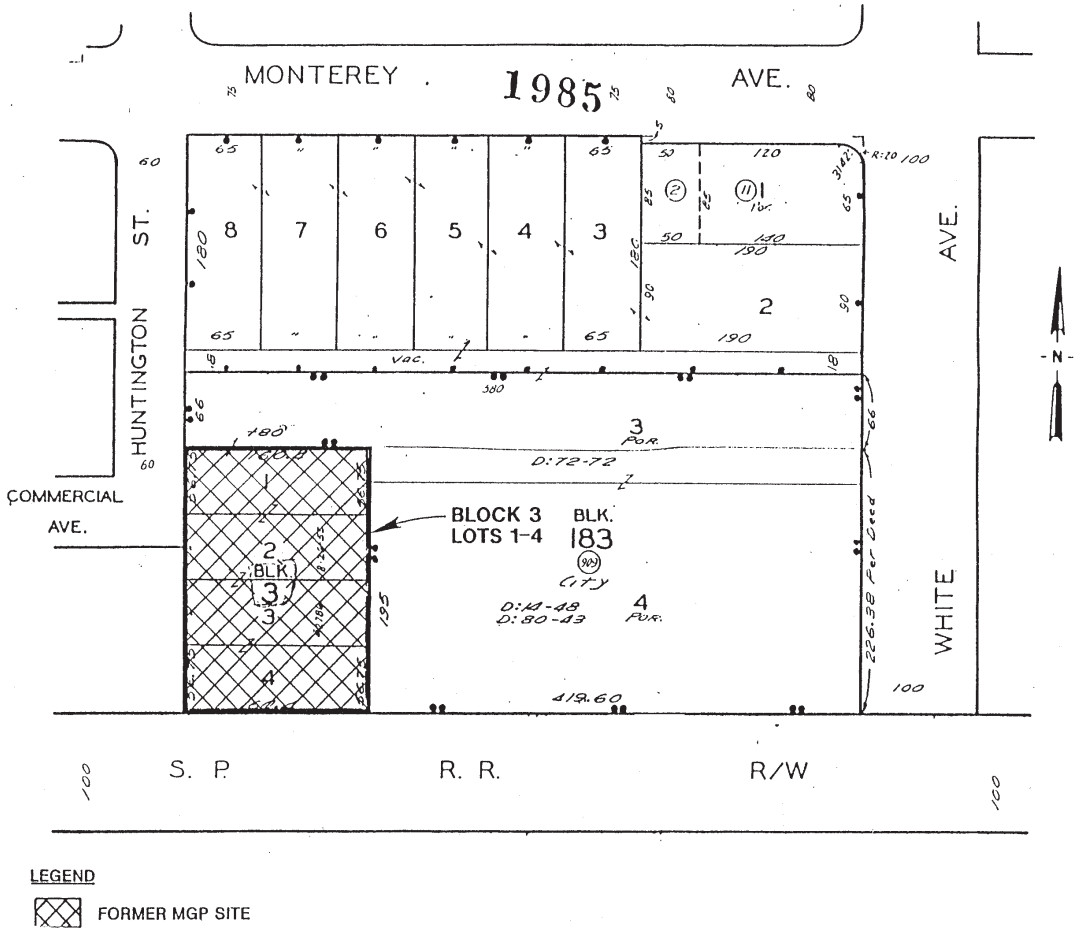

Reference: County of Los Angeles Assessor's Map, Block 3

Source: www.netronline.com/frameset.asp?page=California

Figure 2b

Assessor's Map
Pomona Site

East of Huntington Street
Pomona, CA

PARSONS

Pasadena, California

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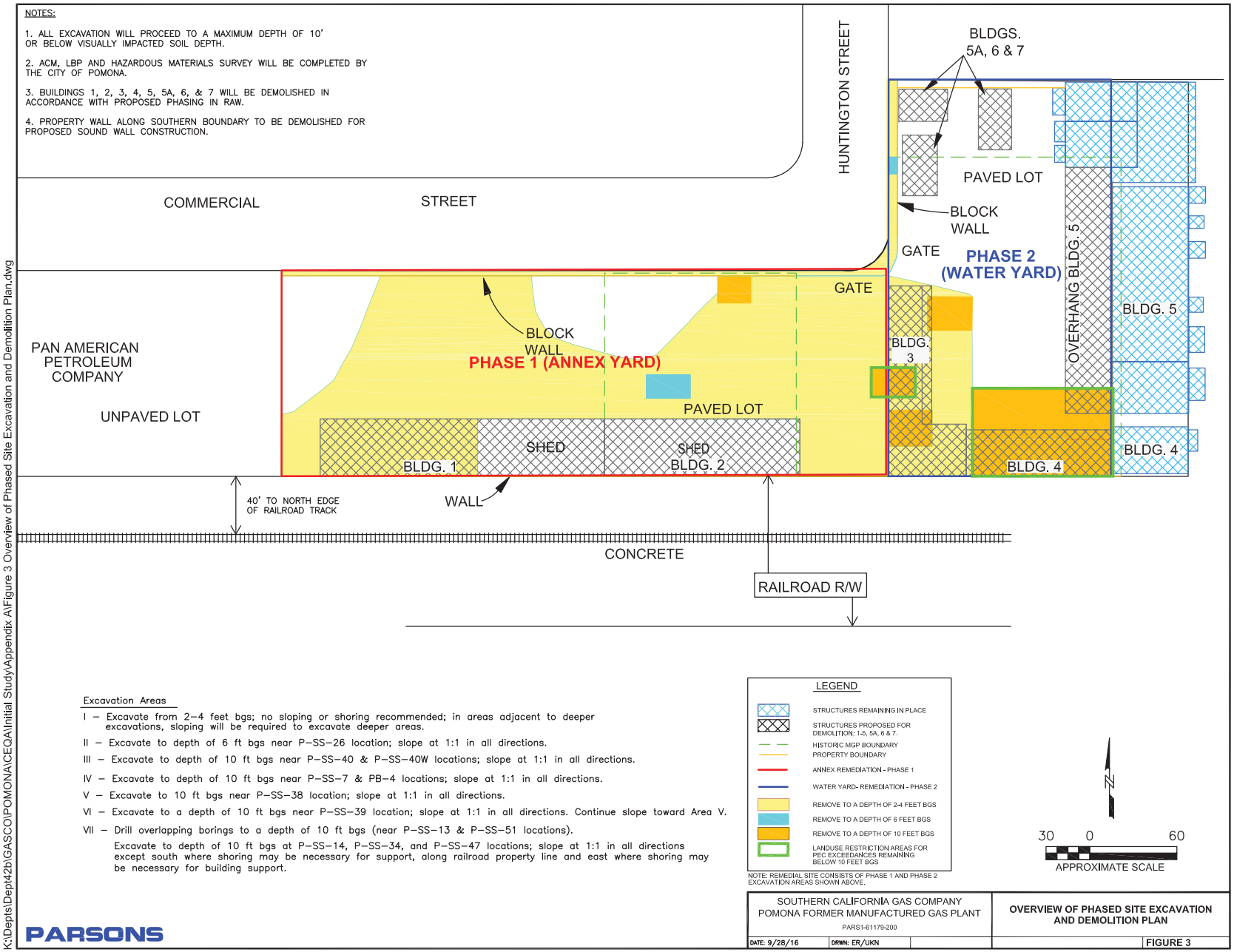
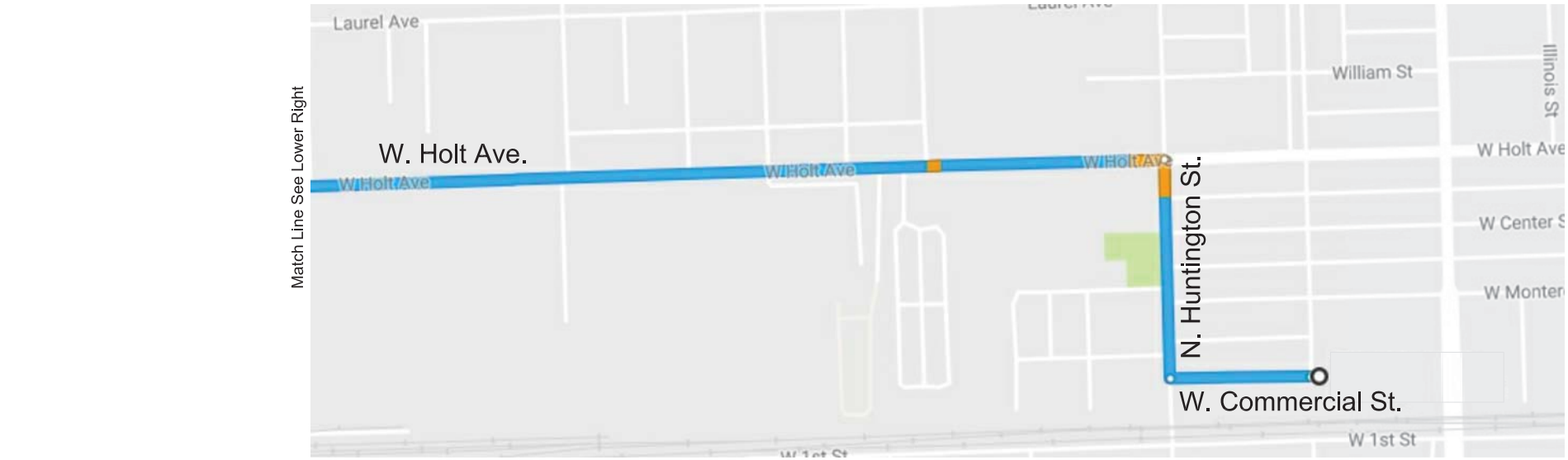
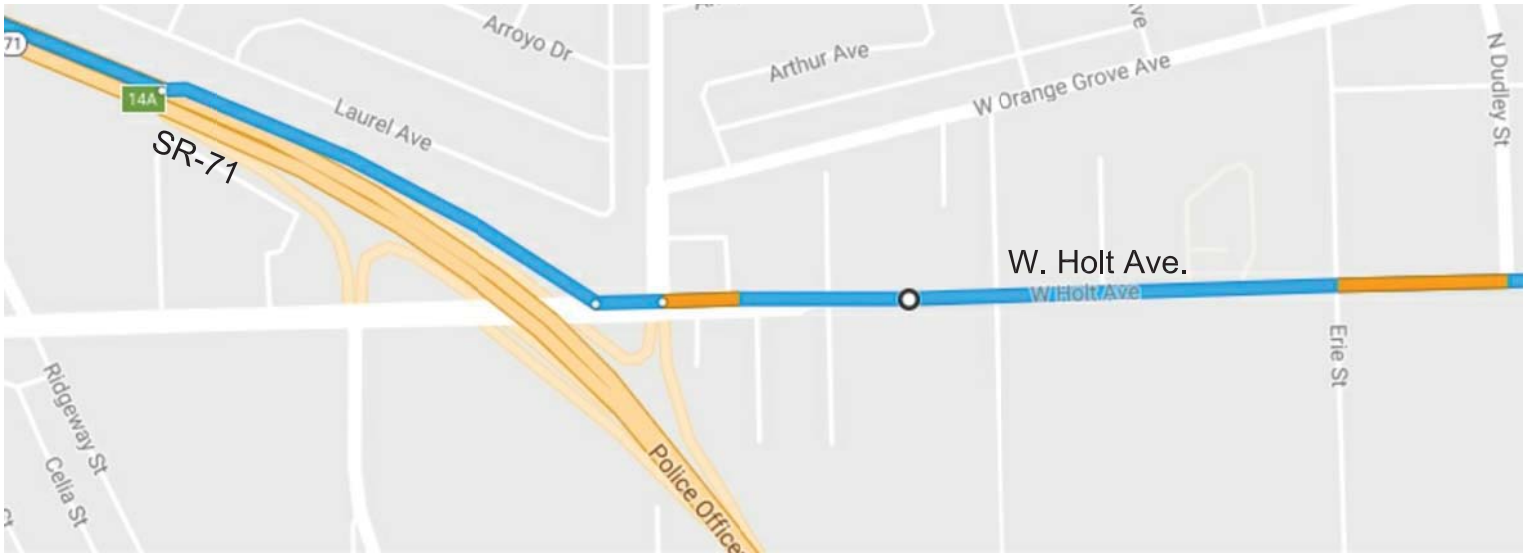
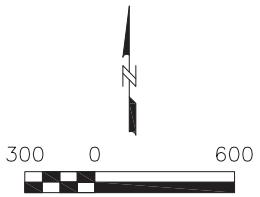

NOTES:
1. ALL EXCAVATION WILL PROCEED TO A MAXIMUM DEPTH OF 10' OR BELOW VISUALLY IMPACTED SOIL DEPTH.
2. ACM, LBP AND HAZARDOUS MATERIALS SURVEY WILL BE COMPLETED BY THE CITY OF POMONA.
3. BUILDINGS 1, 2, 3, 4, 5, 5A, 6, & 7 WILL BE DEMOLISHED IN ACCORDANCE WITH PROPOSED PHASING IN RAW.
4. PROPERTY WALL ALONG SOUTHERN BOUNDARY TO BE DEMOLISHED FOR PROPOSED SOUND WALL CONSTRUCTION.
COMMERCIAL
STREET
HUNTINGTON STREET
BLDGS. 5A, 6 & 7
PAVED LOT
BLOCK WALL
GATE
PHASE 2 (WATER YARD)
OVERHANG BLDG. 5
BLDG. 5
BLDG. 4
GATE
BLOCK WALL
PHASE 1 (ANNEX YARD)
BLDG. 3
PAN AMERICAN PETROLEUM COMPANY
UNPAVED LOT
PAVED LOT
SHED
BLDG. 1
SHED
BLDG. 2
WALL
40' TO NORTH EDGE OF RAILROAD TRACK
CONCRETE
RAILROAD R/W
Excavation Areas
I – Excavate from 2–4 feet bgs; no sloping or shoring recommended; in areas adjacent to deeper excavations, sloping will be required to excavate deeper areas.
II – Excavate to depth of 6 ft bgs near P–SS–26 location; slope at 1:1 in all directions.
III – Excavate to depth of 10 ft bgs near P–SS–40 & P–SS–40W locations; slope at 1:1 in all directions.
IV – Excavate to depth of 10 ft bgs near P–SS–7 & PB–4 locations; slope at 1:1 in all directions.
V – Excavate to 10 ft bgs near P–SS–38 location; slope at 1:1 in all directions.
VI – Excavate to a depth of 10 ft bgs near P–SS–39 location; slope at 1:1 in all directions. Continue slope toward Area V.
VII – Drill overlapping borings to a depth of 10 ft bgs (near P–SS–13 & P–SS–51 locations).
Excavate to depth of 10 ft bgs at P–SS–14, P–SS–34, and P–SS–47 locations; slope at 1:1 in all directions except south where shoring may be necessary for support, along railroad property line and east where shoring may be necessary for building support.
LEGEND
STRUCTURES REMAINING IN PLACE
STRUCTURES PROPOSED FOR DEMOLITION: 1-5, 5A, 6 & 7.
HISTORIC MGP BOUNDARY
PROPERTY BOUNDARY
ANNEX REMEDIATION - PHASE 1
WATER YARD- REMEDIATION - PHASE 2
REMOVE TO A DEPTH OF 2-4 FEET BGS
REMOVE TO A DEPTH OF 6 FEET BGS
REMOVE TO A DEPTH OF 10 FEET BGS
LANDUSE RESTRICTION AREAS FOR PEC EXCEEDANCES REMAINING BELOW 10 FEET BGS
NOTE: REMEDIAL SITE CONSISTS OF PHASE 1 AND PHASE 2 EXCAVATION AREAS SHOWN ABOVE.
N
30 0 60
APPROXIMATE SCALE
PARSONS
SOUTHERN CALIFORNIA GAS COMPANY
POMONA FORMER MANUFACTURED GAS PLANT
PARS1-61179-200
OVERVIEW OF PHASED SITE EXCAVATION AND DEMOLITION PLAN
DATE: 9/28/16
DRWN: ER/UKN
FIGURE 3
K:\Depts\Dept42b\GASCO\POMONA\CEQA\Initial Study\Appendix A\Figure 3 Overview of Phased Site Excavation and Demolition Plan.dwg







Head west on W. Commercial St., Turn right onto N. Hamilton Blvd., Turn left onto W. Holt Ave., Continue onto Valley Blvd. Turn right to merge onto CA-71 N. toward Los Angeles/Pasedena, Merge onto CA-71 N., Use the left 2 lanes to merge onto CA-57 N., Use the right 2 lanes to take exit 25B to merge onto CA-210 E/Foothill Fwy toward San Bernardino, Use the right 3 lanes to take exit 64A toward Barstow, Merge onto I-15 N. Keep left to stay on I-15 N., Take exit 141 for US-395 toward Adelanto/Bishop, Continue on US-395 N. Drive to Hibiscus Rd. in Adelanto Continue onto US-395 N., Slight right onto Adelanto Rd., Turn right onto Hibiscus Rd.

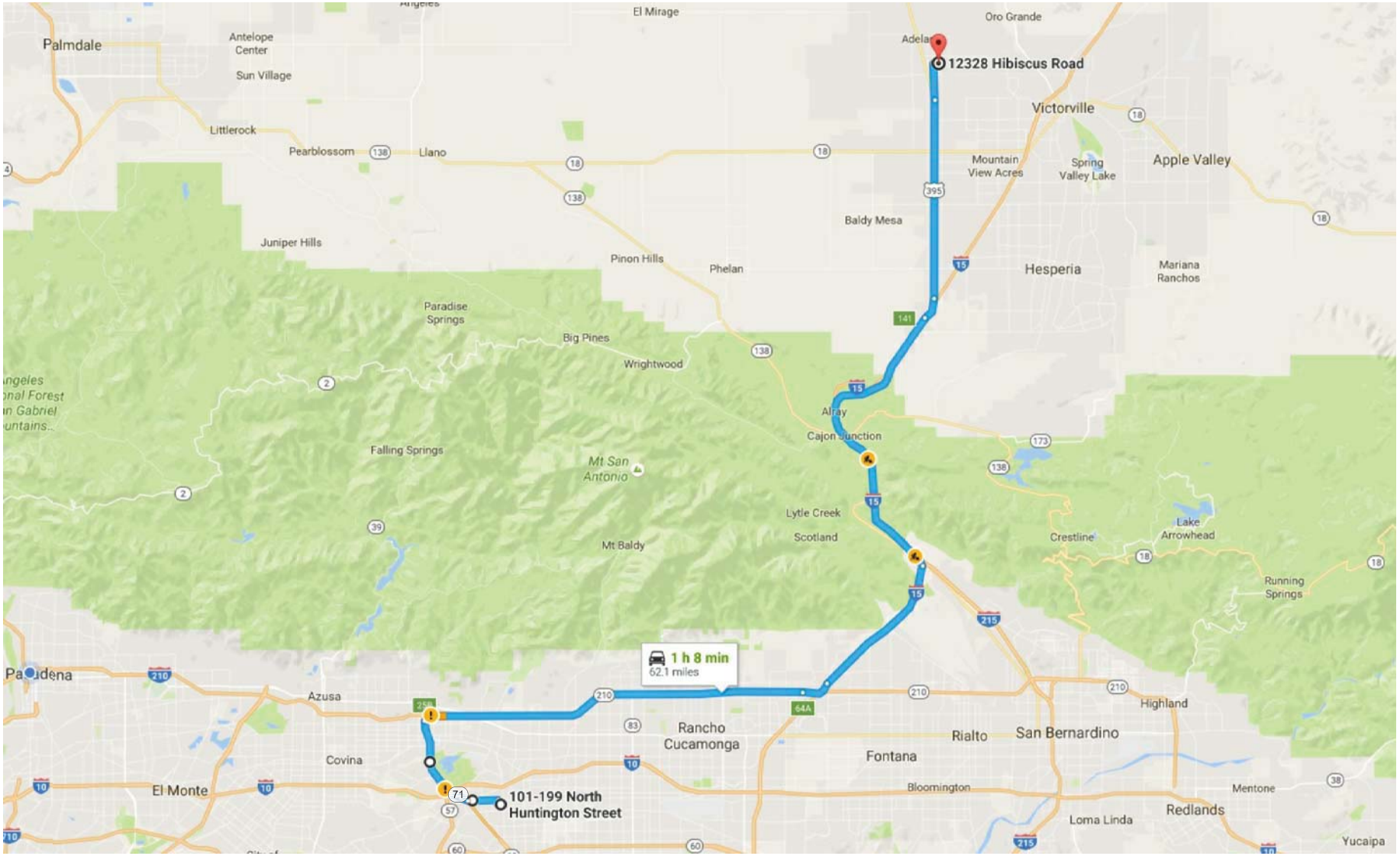
Directions to Soil Safe of California Disposal and Treatment Facilities
Located at 12328 Hibiscus Rd., Adelanto, CA 92301 (760) 246-8001

Note: Refer to Figure 5 for haul route from the Valley Blvd. CA -71 N. on ramp to Soil Safe of California.

PARSONS

SOUTHERN CALIFORNIA GAS COMPANY POMONA FORMER MANUFACTURED GAS PLANT PARS1-61179-200			OFFSITE TRANSPORTATION OF EXCAVATED MATERIALS; HAUL ROUTE to CLOSEST FREEWAY
DATE: 10/12/16	DRWN: PDO		FIGURE 4

K:\Depts\Dept42b\GASCO\POMONA\CEQA\Initial Study\Appendix A\Figure 4 Offsite Transportation of Excavated Materials; Haul Route to Closest Freeway .dwg



Head west on W. Commercial St., Turn right onto N. Hamilton Blvd., Turn left onto W. Holt Ave., Continue onto Valley Blvd. Turn right to merge onto CA-71 N. toward Los Angeles/Pasedena, Merge onto CA-71 N., Use the left 2 lanes to merge onto CA-57 N., Use the right 2 lanes to take exit 25B to merge onto CA-210 E/Foothill Fwy toward San Bernardino, Use the right 3 lanes to take exit 64A toward Barstow, Merge onto I-15 N. Keep left to stay on I-15 N., Take exit 141 for US-395 toward Adelanto/Bishop, Continue on US-395 N. Drive to Hibiscus Rd. in Adelanto Continue onto US-395 N., Slight right onto Adelanto Rd., Turn right onto Hibiscus Rd.

Directions to Soil Safe of California Disposal and Treatment Facilities
Located at 12328 Hibiscus Rd., Adelanto, CA 92301 (760) 246-8001

N

2.5 MI 0 5 MI

PARSONS

SOUTHERN CALIFORNIA GAS COMPANY POMONA FORMER MANUFACTURED GAS PLANT PARS1-61179-200			OFFSITE TRANSPORTATION OF EXCAVATED MATERIALS; HAUL ROUTE TO SOIL SAFE OF CA
DATE: 10/12/16	DRWN: PDO		FIGURE 5

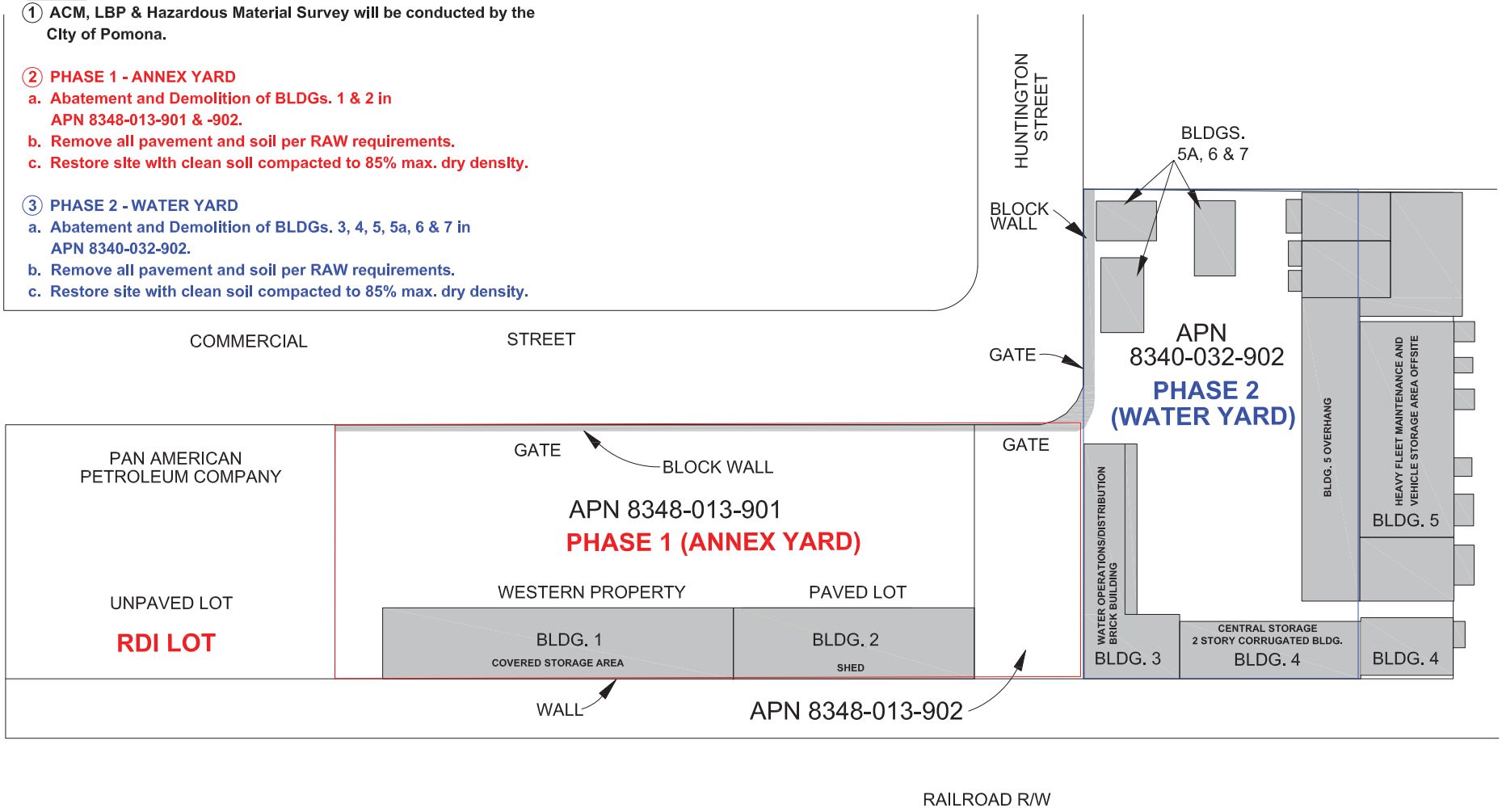
K:\Depts\Dept42b\GASCO\POMONA\CEQA\Initial Study\Appendix A\Figure 5 Offsite Transportation of Excavated Materials; Haul Route to Soil Safe of CA.dwg

NOTES:

1. ACM, LBP & Hazardous Material Survey will be conducted by the City of Pomona.

2. PHASE 1 - ANNEX YARD
   a. Abatement and Demolition of BLDGs. 1 & 2 in APN 8348-013-901 & -902.
   b. Remove all pavement and soil per RAW requirements.
   c. Restore site with clean soil compacted to 85% max. dry density.

3. PHASE 2 - WATER YARD
   a. Abatement and Demolition of BLDGs. 3, 4, 5, 5a, 6 & 7 in APN 8340-032-902.
   b. Remove all pavement and soil per RAW requirements.
   c. Restore site with clean soil compacted to 85% max. dry density.



LEGEND

- EXISTING STRUCTURES
- CITY WATER YARD BOUNDARY
- ANNEX REMEDIATION - PHASE 1
- WATER YARD- REMEDIATION - PHASE 2

N

30 0 60

APPROXIMATE SCALE

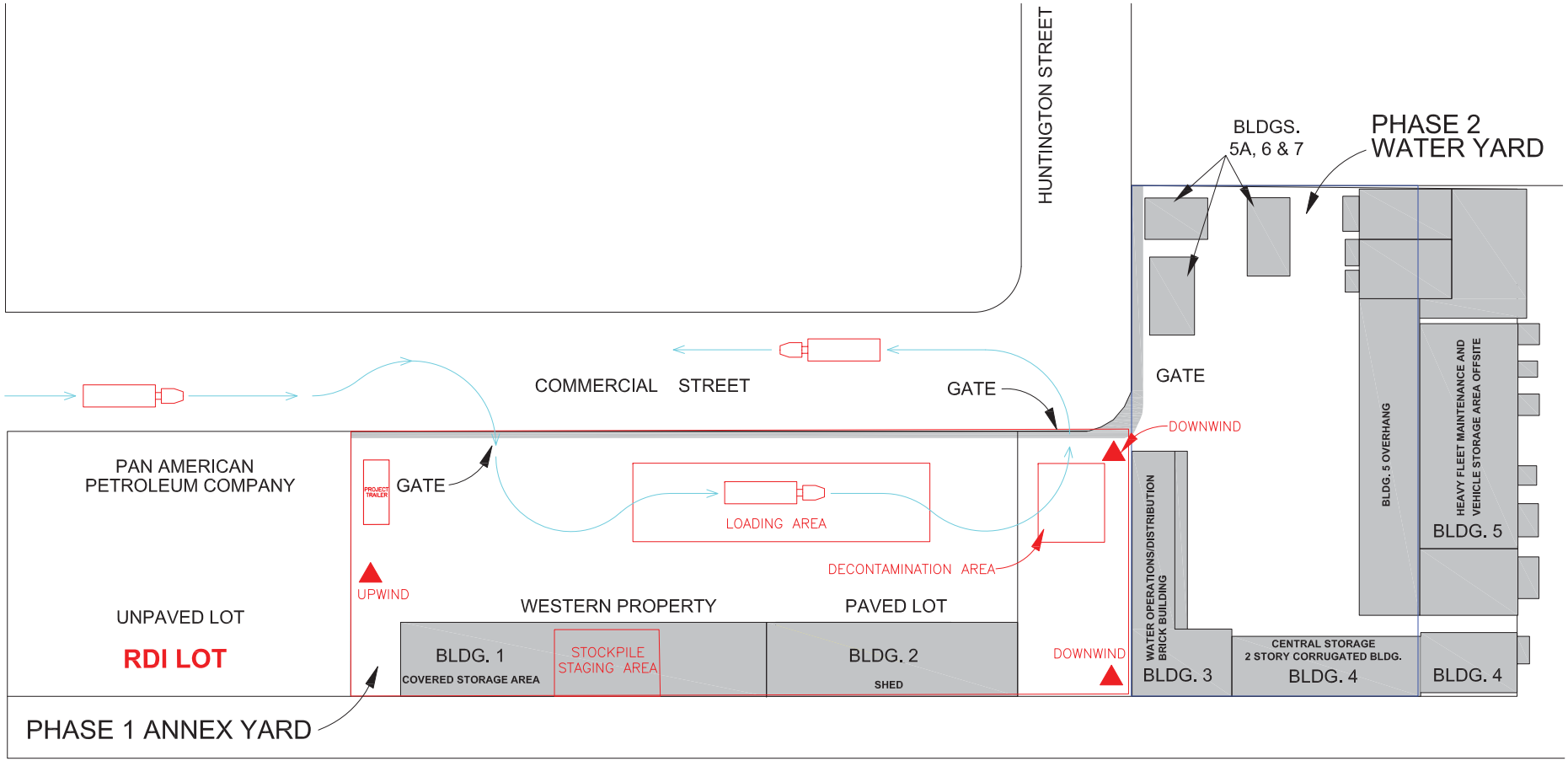
SOUTHERN CALIFORNIA GAS COMPANY
POMONA FORMER MANUFACTURED GAS PLANT
PARS1-61179-200

TWO PHASE REMEDIATION AND DEMOLITION PLAN

DATE: 9/26/16 | DRWN: MB | **FIGURE 6**

PARSONS

K:\Depts\Dept42b\GASCO\POMONA\CEQA\Initial Study\Appendix A\Figure 6 Two Phase Remediation and Demolition Plan.dwg



LEGEND

- EXISTING STRUCTURES
- CITY WATER YARD BOUNDARY
- ANNEX REMEDIATION - PHASE 1
- WATER YARD- REMEDIATION - PHASE 2
- MONITORING STATION (DUST & PAHs)
- TRAFFIC FLOW
- END DUMP TRUCK

N

30 0 60

APPROXIMATE SCALE

PARSONS

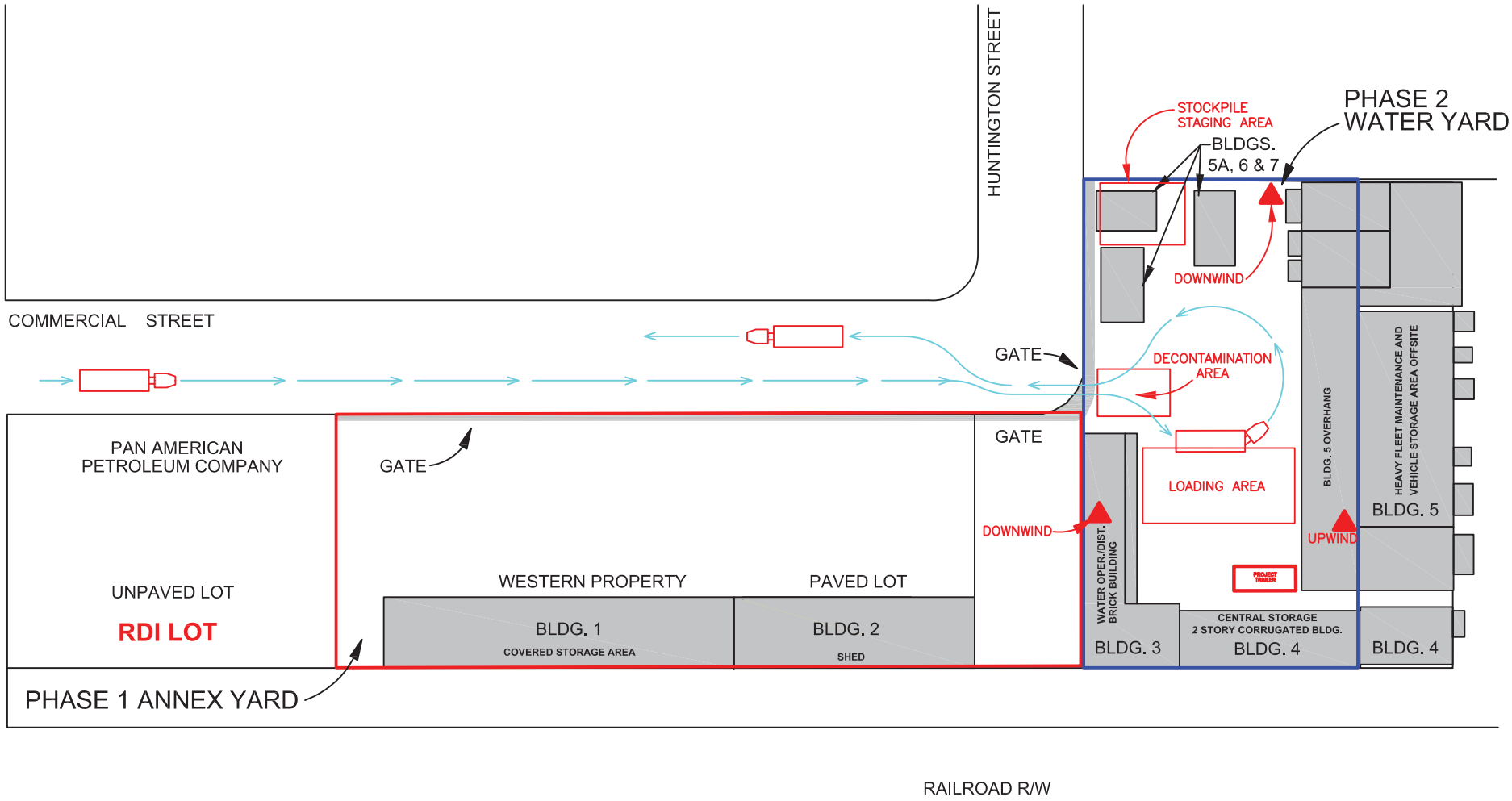
SOUTHERN CALIFORNIA GAS COMPANY
POMONA FORMER MANUFACTURED GAS PLANT
PARS1-61179-200

DATE: 9/28/16 | DRWN: MB

PHASE 1 REMEDIATION & DEMOLITION STAGING PLAN

FIGURE 7

K:\Depts\Dept42b\GASCO\POMONA\CEQA\Initial Study\Appendix A\Figure 7 Phase 1 Remediation & Demolition Staging.dwg



LEGEND

- EXISTING STRUCTURES
- CITY WATER YARD BOUNDARY
- ANNEX REMEDIATION - PHASE 1
- WATER YARD- REMEDIATION - PHASE 2
- MONITORING STATION (DUST & PAHs)
- TRAFFIC FLOW
- END DUMP TRUCK

N

30 0 60

APPROXIMATE SCALE

PARSONS

SOUTHERN CALIFORNIA GAS COMPANY POMONA FORMER MANUFACTURED GAS PLANT PARS1-61179-200	**PHASE 2 REMEDIATION & DEMOLITION STAGING PLAN**
DATE: 9/29/16 | DRWN: MB	FIGURE 8

K:\Depts\Dept42b\GASCO\POMONA\CEQA\Initial Study\Appendix A\Figure 8 Phase 2 Remediation & Demolition Staging.dwg

APPENDIX B
AIR POLLUTANT EMISSION CALCULATIONS

TABLE 1 - APPENDIX B
AIR POLLUTANT EMISSIONS CALCULATIONS

Data:

Area to be disturbed	Less than 2 acres on a 2.6-acre property	
Estimated soil volume to be excavated	10,000	
Estimated removal activities duration	200	
Estimated soil ecavation and haul-out duration	30-60 days	
Estimated clean soil haul-in and site compaction duration	30 to 60 days	
Estimated truck-load capacity	25 tons per truck-load = 18 CY per truck load	
Local impact distance	10	miles
Number of trucks per day - average daily	10	trucks
Number of trucks - maximum daily	20	trucks

Truck Exhaust Emission Calculation

Pollutants	Emission Factor (EF)[1]		Emission (lbs/day/truck)[2]	
	Running Exhaust (lbs/mi)	Cold Start (lbs/trip)	Soil Excavation & Haul Out[3]	Soil Haul-In & Site Compaction[4]
Carbon Monoxcide (CO)	0.00474	0	0.05	0.02
Reactive Organic Carbon (ROC)	0.0014	0	0.01	0.01
Nitorgen Oxide (NOx)	0.02858	0	0.29	0.11
Sulfur Oxide (SOx)	0.0004	0	0.00	0.00
Particulate matters (PM10)	0.00058	0	0.01	0.00

(1) Emission factors were obtained from EMFAC2014 (EMFAC 2014 Version 1.0.7, September 2016)
Assumed heavy duty diesel trucks; average speed of 45 miles per hour.

(2) Emissions (lbs/day) = Running Exhaust Emission (RE) + Cold Start Emission (CS)
RE = EF x Miles Traveled x Trips
CS = EF x Trips

(3) Assuming an average travel distance of 10 miles per trip. Exhaust emissions from the trucks are not expected to impact the project site once the vehicle is outside of the local area. A standard distance in air quality analyses for local impacts is 6 miles (10 km). 10 miles was chosen as a conservative distance for determining local impacts.

(4) Distance from a clean soil source to the Site is estimated at 4 miles per trip.

Construction Equipment Emission Calculation

	Emission Factor (lbs/hr)[1]						Emission (lbs/day)[2]	
Pollutant	Backhoe	Loader	Compactor	Scraper	Water Truck	Excavator	Soil Excavation & Haul Out[3]	Soil Haul-In & Site Compaction[4]
CO	1.79	0.29	0.57	1.25	0.20667	0.28500	32.27200	11.40800
ROC	0.09	0.12	0.025	0.27	0.00967	0.01250	3.61200	1.32000
NOx	0.635	0.95	0.011	3.84	0.00367	0.00550	32.01600	7.77600
SOx	0.045	0.09	0.0005	0.46	0.00020	0.00025	3.30080	0.73600
PM10	0.07	0.09	0.00005	0.41	0.00008	0.00003	3.22232	0.68080

(1) Emission factors were obtained from Table A9-8-A - SCAQMD CEQA Air Quality Handbook (1993)

(2) Emissions (lbs/day) = Sum (equipment emission factor x number used per day x hours used per day)

(3) Construction equipement to be used on a worst case day include 1 water truck, and 1 excavator for 8 hours each; 1 loader for 6 hours; 1 backhoe and 1 scraper for 4 hours.

(4) Construction equipement to be used on a worst case day include 2 compactors at an estimate of 8 hours per day, and 1 loader for 8 hours

PM10 Emissions from Soil Disturbance Calculation

Pollutant	Emission (lbs/day)	
	Soil Excavation & Haul Out	Soil Haul-In & Site Compaction
PM10 from soil disturbance [(1)]	1.14	1.14
PM10 from soil handling [(2)]	22.40	22.40

(1) PM10 Emissions from soil distubance = 26.4 lbs/day/acre
(Table A9-9 (SCAQMD, 1993))
Assuming the 1.3 acres of the Site require a minimum of 30 days for soil excavation & haul out and a minimum of 30 days for soil haul-in & Site compaction

(2) PM10 Emissions from soil handling = $[0.00112(\{[G/5]^{1.3}\}/\{[H/2]^{1.4}\})] \times [I] \times 50\%$
(Table A9-9-G (SCAQMD, 1993))

E =	PM10 Emissions from soil handling (lbs/day)	
G =	Mean wind speed (average daily)	= 5.6 miles/hour (WRCC, 2006)
H =	Moisture content of surface material	= 0.01 (10%)
I =	Maximum tons of soil handled each day	= 500 tons for soil excavation & haul out = 500 tons for soil haul-in & site compaction
50% =	Reduction by watering	

Summary of Emissions Estimates

Source	Pollutant (lbs/day)				
	CO	ROC	NOx	SOx	PM10
Excavation and Haul-Out					
Trucks	0.47	0.14	2.86	0.04	0.06
Construction Equipment	32.27	3.61	32.02	3.30	3.22
Soil Disturbance					1.14
Soil Handling					22.40
Subtotal	***33***	***4***	***35***	***3***	***27***
Haul-In and Site Compaction					
Trucks	0.19	0.06	1.14	0.02	0.02
Construction Equipment	11.41	1.32	7.78	0.74	0.68
Soil Disturbance					1.14
Soil Handling					22.40
Subtotal	***12***	***1***	***9***	***1***	***24***
Construction Worker Commutes*	1.67	0.06	0.12	0.00	0.00
Total Emissions	***46***	***5***	***44***	***4***	***51***
Significance Thresholds	**550**	**75**	**100**	**150**	**150**

*Assuming workers driving to the Site are carpooling and driving 20 miles roundtrip.

References:

EMFAC 2014 Version 1.0.7, September 2016
South Coast Air Quality Management District (SCAQMD) CEQA Air Quality Handbook (1993)

APPENDIX C
CULTURAL RESOURCES STUDIES REPORT (DUDEK, 2016)

Cultural Resources Study for 148 North Huntington Street, City of Pomona, Los Angeles County, California

Prepared for:

City of Pomona Water/Wastewater Operations Department
148 North Huntington Street
Pomona, California 91769
Contact: Timotheus Hampton, PE DBIA

Prepared by:

Samantha Murray, MA, RPA

DUDEK
38 North Marengo Avenue
Pasadena, California 91101

OCTOBER 2016

Printed on 30% post-consumer recycled material.

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APPENDICES

FIGURES

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EXECUTIVE SUMMARY

Dudek was retained by the City of Pomona (the City) to prepare a cultural resources study for the property located at 148 N. Huntington Street. The proposed project involves excavation, removal, and off-site treatment of approximately 10,000 cubic yards of contaminated soils and an additional estimated 3,000 tons of clean soils as part of geotechnical engineering requirements for support of structures on the project site, located at 148 North Huntington Street in the City of Pomona.

The cultural resources study included the following components: (1) a California Historical Resources Information System (CHRIS) records search covering the proposed project site plus a one-half-mile radius at the South Central Coastal Information Center (SCCIC), (2) a review of the California Native American Heritage Commission's (NAHC's) Sacred Lands File, (3) outreach with local Native American tribes/groups identified by the NAHC to collect any information they may have concerning cultural resources, (4) a pedestrian survey of the project site for cultural resources, (5) archival and building development research for buildings located within the project site, (6) the evaluation of buildings/structures in consideration of the City of Pomona historic landmark program and the California Register of Historical Resources (CRHR) designation criteria and integrity requirements, and (7) consideration of impacts to historical resources in compliance with the California Environmental Quality Act (CEQA).

The SCCIC records indicate that 12 cultural resources investigations have been conducted within one-half-mile of the project site. None of these studies included the current project site. There are 13 previously recorded cultural resources located within the one-half-mile search radius. None of these resources fall within the current project site.

The NAHC Sacred Lands File search was completed with negative results. Dudek prepared and sent letters to each of the five persons and entities on the NAHC contact list requesting information about cultural sites and resources in or near the project site. One response was received that requested both archaeological and Native American monitoring.

Nine buildings/structures over 45 years of age were identified within the project site as a result of the pedestrian survey. These resources were recorded and evaluated for historical significance as part of the former Pomona Gas Plant site. As a result of the significance evaluation, the Pomona Gas Plant site was found not eligible for inclusion in the CRHR, nor does it appear to warrant consideration as a City of Pomona Historic Landmark. Therefore, the proposed project will have a less than significant impact on historical resources under CEQA. No further mitigation is required for historical resources.

No archaeological resources were identified within the project site as a result of the CHRIS records search, Native American coordination, or survey. However, it is always possible that intact

archaeological deposits are present at subsurface levels. For these reasons, the project site should be treated as potentially sensitive for archaeological resources. Management recommendations to reduce potential impacts to unanticipated archaeological resources and human remains during campus construction activities are provided.

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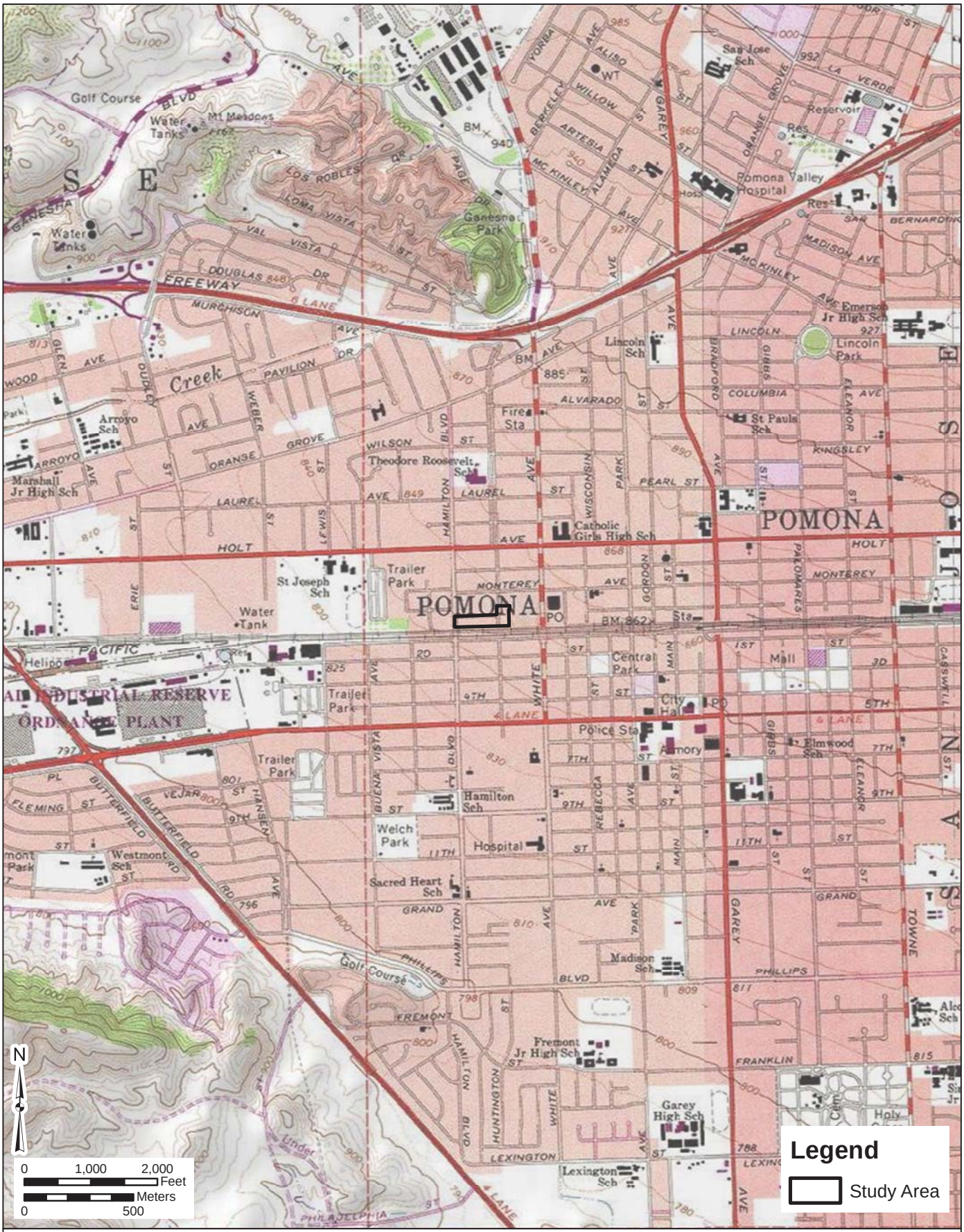
1 INTRODUCTION

Dudek was retained by the City of Pomona (the City) to conduct a cultural resources study for the remediation of the project site located at 148 North Huntington Street (proposed project). The cultural resources study included the following components: (1) a California Historical Resources Information System (CHRIS) records search covering the proposed project site plus a one-half-mile radius at the South Central Coastal Information Center (SCCIC), (2) a review of the California Native American Heritage Commission's (NAHC's) Sacred Lands File, (3) outreach with local Native American tribes/groups identified by the NAHC to collect any information they may have concerning cultural resources, (4) a pedestrian survey of the project site for cultural resources, (5) archival and building development research for buildings located within the project site, (6) the evaluation of buildings in consideration of the City of Pomona historic landmark program and the California Register of Historical Resources (CRHR) designation criteria and integrity requirements, and (7) consideration of impacts to historical resources in compliance with the California Environmental Quality Act (CEQA).

This report was prepared by Dudek Architectural Historian and Archaeologist Samantha Murray, MA, RPA who meets the Secretary of the Interior's Professional Qualification Standards for both architectural history and archaeology.

1.1 Project Location

The project site is generally located in the northwestern portion of the City of Pomona, within the eastern portion of Los Angeles County. The L-shaped site, which consists of four parcels (APNs 8340-032-909, 8348-013-901, 8348-013-902, and 8348-013-903), is specifically located at 148 North Huntington Street and is bound to the north by West Monterey Avenue and West Commercial Street, to the south by the Union Pacific Railroad (UPRR) tracks, to the west by North Hamilton Boulevard and North Huntington Street, and to the east by industrial uses fronting North White Avenue. The project site falls within Township 1 South, Range 8 West of the U.S. Geological Survey (USGS) 7.5-Minute *San Dimas* Quadrangle (see Figure 1).



SOURCE: USGS 7.5-Minute Series San Dimas Quadrangle
Township 1S; Range 8W, 9W; Sections 19, 24, 25, 30

Figure 1
Project Location Map

Pomona Corporate Yard Project

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1.2 Project Description

1.2.2 Construction

The proposed project involves the excavation, removal, and off-site treatment of approximately 10,000 Cubic Yards (CYs) of contaminated soil due to the former presence of a manufactured gas plant (MGP) at the project site. An additional estimated 3,000 tons of clean soils maybe excavated as part of geotechnical engineering requirements for support of structures on the site. These soils will be tested and, if determined acceptable, reused on site. The targeted contaminants of concern (COCs) for remedial action are primarily carcinogenic polycyclic aromatic hydrocarbons (CPAHs), which are co-located with metals, total petroleum hydrocarbons (TPH), and volatile organic compounds (VOCs). Occasional exceedances for arsenic, which are not co-located in the MGP impact areas, were observed. These arsenic exceedances, which are typically located along the planters outside the perimeter of the project site, will be addressed during the course of this remediation. Contaminated soils will be excavated and removed from the project site in order to allow for risk-based site closure. Except for limited areas in the northeast and west, the majority of the original MGP site surface, located at 148 North Huntington Street, is targeted for excavation.

The work will be performed in two phases. In Phase 1, Buildings 1 & 2 in the Annex Yard (APN 8348-013-901 & -902) will be demolished, and subsequently soil removal work will proceed. In Phase 2, Buildings 3, 4, 5, 5A, 6, and 7 in the Water Yard (APN 8340-032-909) will be demolished, and subsequently soil removal work will proceed. After the completion of soil removal work, confirmation soil samples will be collected from the sidewalls and bottom of the excavation, followed by post remediation soil gas sampling.

1.2.2 Permanent

Following completion of remediation activities, new buildings would be constructed on the project site, and permanent operation of the newly constructed Corporate Yard Facility would accommodate all Water and Wastewater Operations, housing a total of approximately 65 to 75 employees. Typical hours of operation for the facility would be 6:30 AM to 5:00 PM, Monday through Thursday. Select operations groups have one to two shifts with a handful of employees on site outside of these regular operating hours. Site access for employees and customers would be via Commercial Street, and division vehicle access points would be located along Monterey Street east of Huntington Street as well as at the intersection of Commercial Street and Huntington Street.

1.3 Regulatory Setting

This section includes a discussion of the applicable state laws, ordinances, regulations, and standards governing cultural resources, which must be adhered to before and during construction of the proposed project.

1.3.1 State

The California Register of Historical Resources (California Public Resources Code Section 5020 et seq.)

In California, the term "historical resource" includes, but is not limited to, "any object, building, structure, site, area, place, record, or manuscript which is historically or archaeologically significant, or is significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California" (California Public Resources Code (PRC), Section 5020.1(j)). In 1992, the California legislature established the CRHR "to be used by state and local agencies, private groups, and citizens to identify the state's historical resources and to indicate what properties are to be protected, to the extent prudent and feasible, from substantial adverse change" (PRC Section 5024.1(a)). The criteria for listing resources on the CRHR were expressly developed to be in accordance with previously established criteria developed for listing in the National Register of Historic Places (NRHP), enumerated below. According to PRC Section 5024.1(c)(1–4), a resource is considered historically significant if it (i) retains "substantial integrity," and (ii) meets at least one of the following criteria:

(1) Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.

(2) Is associated with the lives of persons important in our past.

(3) Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values.

(4) Has yielded, or may be likely to yield, information important in prehistory or history.

In order to understand the historic importance of a resource, sufficient time must have passed to obtain a scholarly perspective on the events or individuals associated with the resource. A resource less than 50 years old may be considered for listing in the CRHR if it can be demonstrated that sufficient time has passed to understand its historical importance (see 14 California Code of Regulations (CCR) 4852(d)(2)).

The CRHR protects cultural resources by requiring evaluations of the significance of prehistoric and historic resources. The criteria for the CRHR are nearly identical to those for the NRHP, and properties listed or formally designated as eligible for listing in the NRHP are automatically listed in the CRHR, as are the state landmarks and points of interest. The CRHR also includes properties designated under local ordinances or identified through local historical resource surveys.

California Environmental Quality Act

As described further, the following CEQA statutes and CEQA Guidelines are of relevance to the analysis of archaeological, historic, and tribal cultural resources:

- PRC Section 21083.2(g) defines "unique archaeological resource."
- PRC Section 21084.1 and CEQA Guidelines Section 15064.5(a) defines "historical resources." In addition, CEQA Guidelines Section 15064.5(b) defines the phrase "substantial adverse change in the significance of an historical resource;" it also defines the circumstances when a project would materially impair the significance of an historical resource.
- PRC Section 21074(a) defines "tribal cultural resources."
- PRC Section 5097.98 and CEQA Guidelines Section 15064.5(e) set forth standards and steps to be employed following the accidental discovery of human remains in any location other than a dedicated ceremony.
- PRC Sections 21083.2(b) and 21083.2(c) and CEQA Guidelines Section 15126.4 provide information regarding the mitigation framework for archaeological and historic resources, including examples of preservation-in-place mitigation measures. Preservation-in-place is the preferred manner of mitigating impacts to significant archaeological sites because it maintains the relationship between artifacts and the archaeological context, and may also help avoid conflict with religious or cultural values of groups associated with the archaeological site(s).

More specifically, under CEQA, a project may have a significant effect on the environment if it may cause "a substantial adverse change in the significance of an historical resource" (PRC Section 21084.1; CEQA Guidelines Section 15064.5(b)). If a site is either listed or eligible for listing in the CRHR, or included in a local register of historic resources, or identified as significant in a historical resources survey (meeting the requirements of PRC Section 5024.1(q)), it is an "historical resource" and is presumed to be historically or culturally significant for purposes of CEQA (PRC Section 21084.1; CEQA Guidelines Section 15064.5(a)). The lead agency is not precluded from determining that a resource is an historical resource even if it does not fall within this presumption (PRC Section 21084.1; CEQA Guidelines Section 15064.5(a)).

A "substantial adverse change in the significance of an historical resource" reflecting a significant effect under CEQA means "physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired" (CEQA Guidelines Section 15064.5(b)(1); PRC Section 5020.1(q)). In turn, the significance of an historical resource is materially impaired when a project (CEQA Guidelines Section 15064.5(b)(2)):

(1) Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register; or

(2) Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to Section 5020.1(k) of the PRC or its identification in an historical resources survey meeting the requirements of Section 5024.1(g) of the PRC, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or

(3) Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register as determined by a lead agency for purposes of CEQA.

Pursuant to these sections, the CEQA inquiry begins with evaluating whether a project site contains any "historical resources," then evaluates whether that project will cause a substantial adverse change in the significance of an historical resource such that the resource's historical significance is materially impaired.

If it can be demonstrated that a project will cause damage to a unique archaeological resource, the lead agency may require reasonable efforts be made to permit any or all of these resources to be preserved in place or left in an undisturbed state. To the extent that they cannot be left undisturbed, mitigation measures are required (PRC Sections 21083.2(a), (b), and (c)).

Section 21083.2(g) defines a unique archaeological resource as an archaeological artifact, object, or site about which it can be clearly demonstrated that without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:

(1) Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information.

(2) Has a special and particular quality such as being the oldest of its type or the best available example of its type.

(3) Is directly associated with a scientifically recognized important prehistoric or historic event or person.

Impacts to non-unique archaeological resources are generally not considered a significant environmental impact (PRC Section 21083.2(a); CEQA Guidelines Section 15064.5(c)(4)).

However, if a non-unique archaeological resource qualifies as a tribal cultural resource (PRC Section 21074(c); 21083.2(h)), further consideration of significant impacts is required.

CEQA Guidelines Section 15064.5 assigns special importance to human remains and specifies procedures to be used when Native American remains are discovered. As described below, these procedures are detailed in PRC Section 5097.98.

California Health and Safety Code Section 7050.5

California law protects Native American burials, skeletal remains, and associated grave goods, regardless of their antiquity, and provides for the sensitive treatment and disposition of those remains. California Health and Safety Code Section 7050.5 requires that if human remains are discovered in any place other than a dedicated cemetery, no further disturbance or excavation of the site or nearby area reasonably suspected to contain human remains shall occur until the County coroner has examined the remains (Section 7050.5(b)). PRC Section 5097.98 also outlines the process to be followed in the event that remains are discovered. If the coroner determines or has reason to believe the remains are those of a Native American, the coroner must contact the NAHC within 24 hours (Section 7050.5(c)). The NAHC will notify the "most likely descendant." With the permission of the landowner, the most likely descendant may inspect the site of discovery. The inspection must be completed within 48 hours of notification of the most likely descendant by the NAHC. The most likely descendant may recommend means of treating or disposing of, with appropriate dignity, the human remains and items associated with Native Americans.

1.3.2 Local

City of Pomona Municipal Code – Historic Preservation (Sec. 5809.13)

A. Purpose and Intent. The purpose of this section is to preserve the city of Pomona's cultural, historical, and architectural heritage and resources as living parts of community life which will benefit and enrich the lives of its present and future residents. To these ends, this section is intended to accomplish the following:

1. Preserve the diverse architectural styles reflecting phases of the city of Pomona's history and encourage complementary contemporary development to inspire a more livable urban environment;

2. Build civic pride by promoting the understanding, appreciation, and enjoyment of the city's rich heritage and cultural resources;

3. Enhance property values and increase economic and financial benefits to the city;

4. Enhance the city of Pomona for residents, tourists and visitors thereby stimulating business and industry; and

5. Conserve valuable material and energy resources by fostering ongoing use and maintenance of the existing built environment.

D. Historic Landmark Designation Criteria. For the purposes of this section, an improvement, natural feature, or site may be designated an historic landmark by the historic preservation commission and city council and any area within the city of Pomona may be designated an historic district pursuant to subsection E of this section, if the building or majority of buildings (in a district) are fifty (50) or more years old or of exceptional quality if less than fifty (50) years old, and it meets one or more of the following criteria:

1. It exemplifies or reflects special elements of the city of Pomona's cultural, social, economic, political, aesthetic, engineering, architectural, or natural history;

2. It is identified with persons or events significant in local, state, or national history;

3. It embodies distinctive characteristics of a style, type, period, or method of construction, or is a valuable example of the use of indigenous materials or craftsmanship;

4. It contributes to the significance of an historic area, being a geographically definable area possessing a concentration of historic or scenic properties or thematically related grouping of properties which contribute to each other and are unified aesthetically by plan or physical development;

5. It is the work of a notable builder, designer, landscape designer or architect;

6. It has a unique location or singular physical characteristics or is a view or vista representing an established and familiar visual feature of a neighborhood, community, or the city of Pomona;

7. It embodies elements of architectural design, detail, materials, or craftsmanship that represent a significant structural or architectural achievement or innovation;

8. It is similar to other distinctive properties, sites, areas, or objects based on an historic, cultural, or architectural motif;

9. It reflects significant geographical patterns, including those associated with different eras of settlement and growth, particular transportation modes, or distinctive examples of park or community planning;

10. It is one of the few remaining examples in the city of Pomona, region, state, or nation possessing distinguishing characteristics of an architectural or historical type or specimen.

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2 BACKGROUND RESEARCH

2.1 CHRIS Records Search

Dudek requested a CHRIS records search from the SCCIC, which houses cultural resources records for Los Angeles County. Dudek received the results on August 19, 2016. The search included any previously recorded cultural resources and investigations within a one-half-mile radius of the project site. The CHRIS search also included a review of the NRHP, the CRHR, the California Points of Historical Interest list, the California Historical Landmarks list, the Archaeological Determinations of Eligibility list, and the California State Historic Resources Inventory list. A letter from the SCCIC summarizing the results of the records search, maps of previously recorded resources and previously conducted studies, and a bibliography of prior cultural resources studies is provided in Confidential Appendix A of this report.

2.1.1 Previously Conducted Cultural Resources Studies

The SCCIC records indicate that 12 cultural resources investigations have been conducted within one-half-mile of the project site. None of these studies included the current project site. The closest studies to the project site involved the UPRR right-of-way, adjacent to the southern border of the project site. Table 1 presents a record of all previously conducted studies identified as a result of the records search.

Table 1
Previously Conducted Cultural Resources Studies Within 0.5-Mile of the Project Site

SCCIC Report No.	Title of Study	Author(s) and Date	Proximity to Project Site
LA-02882	Cultural Resources Investigations, Site Inventory, and Evaluations, the Cajon Pipeline Project Corridor, Los Angeles and San Bernardino Counties, California	McKenna, Jeanette A. 1993	Outside (adjacent to south)
LA-02970	Cajon Pipeline Project Draft Environmental Impact Statement Environmental Impact Report	Chamberlaine, Pat and Jean Rivers-Council 1992	Outside (adjacent to south)
LA-04335	Historic Property Survey Report Pomona Regional Transit Center Project 156 West Commercial Street Pomona, California	Pilcher, Charles 1995	Outside (to east)
LA-04835	Cultural Resources Inventory Report for Williams Communications, Inc. Proposed Fiber Optic Cable System Installation Project, Los Angeles to Riverside, Los Angeles and Riverside Counties	Ashkar, Shahira 1999	Outside (adjacent to south)
LA-05724	Cultural Resource Assessment, Cingular Wireless Facility No. La 468-01 Los Angeles County, California	Duke, Curt 2001	Outside (to southeast)
LA-08665	Historic Resources Assessment: Downtown Pomona Demolition Project, City of Pomona, Los Angeles County, California	Tibbet, Casey and Shannon Carmack 2007	Outside (to southeast)

Table 1
Previously Conducted Cultural Resources Studies Within 0.5-Mile of the Project Site

SCCIC Report No.	Title of Study	Author(s) and Date	Proximity to Project Site
LA-08822	Cultural Resources Records Search and Site Visit Results for Royal Street Communications, LLC Candidate La0461a (downtown 2nd), 301 West 2nd Street, Pomona, Los Angeles County, California	Bonner, Wayne H. and Kathleen A. Crawford 2006	Outside (to southeast)
LA-10041	Inventory and Evaluation of NRHP Eligibility of California Army National Guard Armories	Lassell, Susan, E. 2000	Outside (to southeast)
LA-11047	Draft Historic Preservation Treatment Plan for Six Pre-World War II National Register of Historic Places - Eligible California Army National Guard Armories	Unknown 2002	Outside (to southeast)
LA-11299	Section 106 Review for Pomona Transit Center Electric Bus Charging Station Project	Campbell, Sandra 2010	Outside (to east)
LA-11961	Cultural Resources Records Search and Site Visit Results for T-Mobile West, LLC Candidate IE25973-A (Founders Building), 269 South Thomas Street, Pomona, Los Angeles, County, California	Bonner, Wayne 2012	Outside (to southeast)
LA-12029	Final Inventory and Evaluation of National Register of Historic Places Eligibility of California Army National Guard Armories	Lassell, Susan 2002	Outside (to southeast)

2.1.2 Previously Recorded Cultural Resources

According to the SCCIC records, there are 13 previously recorded cultural resources located within the one-half-mile search radius (Table 2). None of these resources fall within the current project site. The closest resource to the project site is the UPRR/Southern Pacific Railroad segment adjacently located south of the project area. This segment was found not eligible for the NRHP, CRHR, and local listing. The next closest resource is the NRHP-listed Pomona City Stables property, located just east of the current project site. No impacts are proposed to this resources as part of the current project. The Historic Property Data File lists numerous addresses within the one-half-mile search radius, however, none of these properties are located within the project site. This list is included in Confidential Appendix A.

Table 2
Previously Recorded Cultural Resources within 0.5-Mile of the Project Site

Primary Number	Trinomial	Resource Description	NRHP Eligibility Status	Recorded By and Year	Proximity to Project Site
P-19-180713	—	Historic: Edison Historic District	1S (listed in NRHP and CRHR)	1984 (D. Marsh)	Outside (to southeast)

Table 2
Previously Recorded Cultural Resources within 0.5-Mile of the Project Site

Primary Number	Trinomial	Resource Description	NRHP Eligibility Status	Recorded By and Year	Proximity to Project Site
P-19-186112	—	Historic: Union Pacific RR, Southern Pacific RR Los Angeles Division	6Z (not eligible)	1999 (S. Ashkar, Jones & Stokes); 2002 (Rand F. Herbert, JRP); 2009 (R. Ramirez and F. Smith, SWCA); 2009 (F. Smith and J. Steely, SWCA)	Outside (adjacent to south)
P-19-187082	—	Historic: Pomona City Stables	1S (listed in NRHP and CRHR)	2004 (M. Griffin, Pomona Valley Historical Society)	Outside (adjacent to east)
P-19-187091	—	Historic: Original Pomona College Building	Appears eligible for NRHP	1977 (R. Hatheway, Natural History Museum)	Outside (to southeast)
P-19-188027	—	Historic: commercial building at 439-455 W. Second St.	6Z (not eligible)	2007 (C. Tibbet & S. Carmack, LSA)	Outside (to southeast)
P-19-188028	—	Historic: commercial building at 435 W. Second St.	6Z (not eligible)	2007 (C. Tibbet & S. Carmack, LSA)	Outside (to southeast)
P-19-188029	—	Historic: commercial building at 409-429 W. Second St.	6Z (not eligible)	2007 (C. Tibbet & S. Carmack, LSA)	Outside (to southeast)
P-19-188030	—	Historic: commercial building at 273-277-295 W. Second St.	6Z (not eligible)	2007 (C. Tibbet & S. Carmack, LSA)	Outside (to southeast)
P-19-188031	—	Historic: commercial building at 235-269 W. Second St.	6L (not eligible for local; may warrant consideration in local planning)	2007 (C. Tibbet & S. Carmack, LSA)	Outside (to southeast)
P-19-188032	—	Historic: commercial building at 154 S. Main St.	6L (not eligible for local; may warrant consideration in local planning)	2007 (C. Tibbet & S. Carmack, LSA)	Outside (to southeast)
P-19-188718	—	Historic: residence at 748 Buena Vista	6Z (not eligible)	2005 (Sandra Campbell, City of Pomona)	Outside (to southwest)
P-19-189200	—	Historic: Southern Pacific Station/Pomona Transit Center Depot Building	Requires reevaluation	1977 (Roger Hatheway, Natural History Museum); 2004 (David Greenwood, Myra Frank & Assoc. / Jones & Stokes); 2010 (Sandra Campbell, City of Pomona)	Outside (to east)
P-19-190998	—	Historic: First National Bank / The Vault Club	3S (appears eligible for NRHP)	2001 (Judith Marvin, LSA)	Outside (to southeast)

2.2 Native American Coordination

As part of the process of identifying cultural resources within or near the project site, Dudek contacted the NAHC to request a review of the Sacred Lands File (SLF). The NAHC emailed a response on August 4, 2016, which stated that the SLF search was completed with negative results. Because the SLF search does not include an exhaustive list of Native American cultural resources, the NAHC suggested contacting Native American individuals and/or tribal organizations who may have direct knowledge of cultural resources in or near the project site. The NAHC provided the contact list along with the SLF search results. Documents related to the NAHC SLF search are included in Appendix B.

Dudek prepared and sent letters to each of the five persons and entities on the contact list requesting information about cultural sites and resources in or near the project site. These letters, mailed on August 8, 2016, contained a brief description of the proposed project, a summary of the SLF search results, and a reference map. Dudek has received the following responses to the coordination letters to-date (Appendix B):

- On August 13, 2016, Andrew Salas, Chairman of the Gabrieleno Band of Mission Indians – Kizh Nation responded via email. Mr. Salas stated that the proposed project site is situated within an area where the ancestral and traditional territories of the Kizh (Kitc) Gabrieleno villages Such as *Tooypingn* and *Wiininga*, adjoined and overlapped each other during the Late Prehistoric and Protohistoric Periods. Mr. Salas also provided information regarding two metates (i.e., grinding stones) that were discovered during construction of the Cal Poly Pomona College of Science Building. For these reasons, Mr. Salas recommends the presence of both a certified Native American and qualified archaeological monitor on-site during all ground disturbing activities.

The proposed project is subject to compliance with Assembly Bill (AB) 52 (PRC 21074), which requires consideration of impacts to "tribal cultural resources" as part of the CEQA process, and requires the CEQA lead agency to notify any groups (who have requested notification) of the proposed project who are traditionally or culturally affiliated with the geographic area of the project. Because AB 52 is a government-to-government process, all records of correspondence related to AB 52 notification and any subsequent consultation are on file with the City.

2.3 Building Development Research

2.3.1 Building Permit Research

Dudek conducted in-person building permit research for the property on September 7, 2016 at the City of Pomona Building and Safety counter. All records for new construction or alteration were reviewed and copied. Dudek also contacted Building Official Gil Petris and requested all plans from the archive vault for 148 N. Huntington Street. The archive provided a single plan sheet from 1951 for remodel of the existing Meter Shop (Building 7).

2.3.2 Historical Newspapers

The history and development of the project site was also researched in historic newspapers, including:

- *Los Angeles Times* 1886-1922 and 1923-curent files, accessed via ProQuest Historical Newspapers.
- California Digital Newspaper Collection (1846-present), a project of the Center for Bibliographical Studies and Research at the University of California, Riverside.

2.3.3 Historic Aerial Photographs

The project site was also reviewed on historic aerial photographs via the National Environmental Title Research, LLC (NETR) from the years 1946, 1948, 1953, 1959, 1964, 1965, 19166, 1972, 1980, 1994, 2002, 2003, 2005, 2009, 2010, and 2012 (NETR 2011).

2.3.4 Sanborn Fire Insurance Maps

The project site is visible on Sanborn Fire Insurance Maps from the years 1895, 1906, 1911, 1928, and 1943. All maps were downloaded online via the Los Angeles Public Library. A description of the project site and surrounding area is provided below for each available year:

- **1895:** the project site is visible at the southeast corner of Monrovia Avenue (present-day Huntington Street) and Grace Avenue (present-day Commercial Street). The main track of the Southern Pacific Railroad (SPRR) runs adjacent to the south. The parcel on the east side of Monrovia Avenue contains several buildings and structures associated with the "Pomona Gas & Elec Light Co's Gas Works" plant, including a 20,000 cubic foot capacity gas holding tank, coke bin, workshop, coal shed, repair shop, scrubber, storage sheds, lime storage, a large barn, and another large building at the northernmost portion of the main parcel. The parcels along Grace Avenue do not contains any buildings or structures at this time.

- **1906:** the parcel on the east side of Monrovia Avenue is now labeled as the "Edison Electric Co. Gas Works" and it is noted that it is "being remodeled." The southernmost portion of the parcel (adjacent to the SPRR tracks) includes the same 20,000 cubic foot tank, but some of the other elements have changed. The coke bin appears to have been removed and there are new unidentifiable structures in its place. The repair shop and scrubber are now labeled "engine room", and another section is labeled "generator room." The lime area to the north is now labeled "concrete purifying boxes." The northernmost portion of the parcel no longer contains a barn. In its place is a smaller building labeled "cement storage." There is also an additional building on the northwest corner. The parcels along Grace Avenue now contain a small oil tank in the southeast corner, a 50,000 cubic foot capacity gas holding tank, and a few smaller structures in the westernmost parcels.

- **1911:** within just five years, numerous changes have occurred to the property. The parcel on the east side of Monrovia Avenue is now labeled "So Cal Edison Co's Gas Wks" and notes "run day & night. Fuel oil – City water." A new steel frame building has been erected in place of the old repair shop/engine room/generator room. This appears to be the same corrugated metal building that exists at the site today. Perpendicular to this building is another structure labeled Compressor House. Adjacent to the northwest is another new structure labeled "Settling Basin." Additional structures have been added to the parcels along Grace Avenue, including a second 50,000 cubic foot capacity gas holding tank, a pressure tank in the northeast corner, a concrete oil tank in the ground near the southeast corner.

- **1928:** by this time, the project site starts to take on some of the characteristics we see today. The parcel on the east side of Monrovia Avenue is now labeled "Southern Counties Gas Co." The brick building on the southwest corner of the parcel is now in place and is noted to be used as a warehouse and office. This building attaches to the existing metal warehouse on its southeast elevation. The building previously noted to be a compressor house is now an auto repair garage. The long, narrow corrugated metal vehicle storage structure also appears to be in place by this time along the easternmost boundary of the parcel. A building outline near the northernmost edge of the parcel appears to be in the location of the present-day locker room building. The parcels along Grace Avenue have undergone significant changes. The westernmost parcel is now labeled "Pan-American Petroleum Co" and contains various structures including an oil and grease warehouse, filling station, pump house, office, hydrants and tanks. Two additional gas holding tanks have also been added, for a total of four 50,000 cubic foot tanks. Also of note is the addition of SPRR spur tracks to the south, which services both the gas and petroleum companies.

- **1943:** Monrovia Avenue is now known as Huntington Street. The parcel on the east side of Huntington is still labeled "Southern Counties Gas Co." Changes include removal of the

auto repair garage and the large building that occupied the northwest corner of the parcel. A building on the northernmost portion of property is now labeled “lockers” and “auto washing.” The northeastern most portion of the parcel has been developed with two reinforced concrete buildings for auto repair. Grace Avenue is now known as W. Commercial Street. The parcels along this street have also undergone additional changes. The westernmost parcel is now labeled “Richfield Oil Co. of California.” The easternmost parcel is labeled “Southern Counties Gas Co. Pomona Sta. No. 1.” Many of the structures seen on the 1928 Sanborn are still in place by 1943. The Richfield Oil parcel appears largely unchanged. Changes to the Southern Counties Gas parcel include the relocation of two of the large tanks closer to the western portion of the parcel, to form a tight cluster of four tanks. Moving of the tanks has allowed for a new steel supply and storage building (this appears to be the same building in place today) and a smaller structure is adjacent to the west.

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3 HISTORIC CONTEXT

3.1 City of Pomona

3.1.1 Historical Overview

The project site is in an area historically occupied by the Gabrieliño or Gabrieleno. The archaeological record indicates that the Gabrieliño arrived in the Los Angeles Basin around 500 B.C. Many contemporary Gabrieliño identify themselves as descendants of the indigenous people living across the plains of the Los Angeles Basin and adjacent areas and use the native term Tongva to describe themselves. The name "Gabrieliño" denotes those people who were administered by the Spanish from the San Gabriel Mission, which included people from the Gabrieliño area proper as well as other social groups (Bean and Smith 1978; Kroeber 1925). Tongva lands encompassed the greater Los Angeles Basin and three Channel Islands, San Clemente, San Nicolas, and Santa Catalina. The Tongva established large, permanent villages in the fertile lowlands along rivers and streams, and in sheltered areas along the coast, stretching from the foothills of the San Gabriel Mountains to the Pacific Ocean.

The arrival of the Spanish in 1769 brought an end to the Tongva's native way of life, as thousands were forced into a life of hard labor at Mission San Gabriel which was built by the Spanish in 1776. After Mexico's independence from Spain the power of the Spanish missions began to dissolve and by the mid-1830s, much of the land was freed from government hands. Don Ygnacio Palomares and Don Ricardo Vejar petitioned Mexican governor Juan Batista for 15,000 acres of land known as Rancho San Jose (occupied today by the cities of Pomona, LaVerne, San Dimas, Diamond Bar, Azusa, Covina, Walnut, Glendora, and Claremont). The petition was granted in 1837 and the two families settled on the land within present-day Pomona with their families and livestock. Palomeres and Vejar soon prospered from the sale of cattle to new residents who arrived during the Gold Rush of the 1850s. By 1858, the Vejar Rancho became a stop for the Butterfield stagecoach (Gallivan et al. 2007).

After some poor financial decisions, Vejar lost a large portion of the rancho to two Los Angeles merchants named Louis Shlesinger and Hyman Tischler in 1861. Tischler employed Louis Phillips to manage the rancho, who made substantial improvements to the rancho. In 1866, Phillips was able to purchase the property from Tischler and established his home in the southwest corner of the rancho. The small settlement of Spadra soon developed near Phillip's home, and by 1868, had a post office and stage coach stop.

As Spadra became more established, Phillips contracted with the SPRR for railroad right-of-way across his ranch. The first train from Los Angeles to Spadra ran on April 4, 1874. By 1875, the line was extended to Colton and a depot was constructed five miles east of Spadra in present-day Pomona.

The new found rail access, in combination with fertile soil and a reliable water supply, made the region very appealing to investors and speculative land purchases were under way by 1874. A group of Los Angeles investors organized the Los Angeles Immigration and Land Co-Operative Association (LAILCA), which purchased approximately 5,600 acres of land adjacent to the rail depot. Soon thereafter, one square mile of street grid was laid out, with Garey Avenue being the central street through town. The new community became known as Pomona, for the Roman goddess of fruit. The Pomona Land and Water Company would take over LAILCA's land in 1882.

Early development in Pomona centered on the SPRR depot, located on the north side of the tracks between Gordon and Elizabeth Streets. Local services soon followed, including a hotel in 1875 and a post office that was moved from Spadra. Most of the town's commercial businesses, including banks, shops, hotels, and saloons, were located on Second Street. Liveries, wagon, and blacksmith shops made up most of the businesses on First Street, which was adjacent to the railroad land to the south. First Street also hosted numerous saloons as well as the town skating rink.

The local economy was centered around agriculture. After the great drought of the 1860s, cattle and sheep were replaced by grapes, which were producing local wine by the 1870s. After failing to compete in the wine market, Pomona farmers focused on olives, and soon became the largest producer of olive oil in the U.S. After once again losing out to a larger market, olive groves were replaced by much more profitable citrus crops. Fruit packing companies were constructed along the north side of the SPRR and a new depot was constructed. South of the railroad along First Street continued to be characterized by transportation-related businesses, primarily stables. Some commercial development had spread north from Second Street along Thomas Street and Garey Avenue.

At the turn of the century, the citrus industry was booming in Pomona and a new passenger depot was constructed along the south side of the SPRR between Garey Avenue and Louisa Street. A freight depot was also built further east between Gibbs and Elmina Streets. While the local economy was more diverse by the 1920s, agricultural remained the dominant industry. The industrial center of Pomona located north of the railroad along the south side of Commercial Street. With the rise in popularity of the automobile, horse-powered transportation industries along First Street were replaced by auto dealerships and repair garages by 1928.

The late1930s-1940s saw the demise of citrus industry's dominance in the Pomona Valley, with livestock production and commercial manufacturing on the rise. The original SPRR depot was replaced in 1940 with a new revival style building. Following World War II, large tracts of residential housing began to quickly replace citrus groves and new freeways began to appear across the landscape (McKenna 2012).

By 1953, Pomona had more than 40,000 residents and while hundreds of new homes were being built to meet the needs of a rapidly growing post World War II population, agriculture continued to be an important industry for the City, with over 100 acres planted in truck gardens, alfalfa, orchards, vineyards, and citrus groves. Pomona had also become a transportation hub with three transcontinental railroads passing through the City and bus lines running in all directions. Pomona was considered to be one of the most centrally located cities in Southern California, located no more than a two hour drive away from the mountains, beaches, and deserts.

The mid-century in Pomona saw an industrial boom that created numerous jobs and increased payroll. The Pomona Tile Manufacturing Company, H.W. Loud Machine Works, the Convair Pomona Plant, Potlach Paper Mill, Hazel Atlas Glass, Brogdex Company, Bestform Foundation, Malwin of California, and Wayne Manufacturing Company all employed hundreds of workers each. Pomona also served as the division office for Southern California Edison Company and Sears Roebuck purchased 10 acres on the eastern edge of the City (Gallivan et al. 2007).

Highways now provided access to new distribution malls, changing the model for transportation and shipping. Downtown Pomona was in need of some major changes to restore vitality to the central business district and fix a list of top issues including poor traffic circulation, a lack of parking and access to business and public events, and slow retail activity. The Garey Avenue railroad underpass was constructed in 1962 to improve the flow of traffic between the growing northern section of the City and the older part of the City to the south (McKenna 2012).

3.1.2 Early Energy Resources

At the turn of the twentieth century, Los Angeles experienced rapid population growth that brought attention to the region's inadequate supply of energy resources, a critical component of industrial development. In comparison to other parts of the country, Los Angeles was considered a "deficit area" that lacked sufficient resources. Coal was almost entirely absent from the region, with known deposits located so far away that transportation costs made any coal-dependent activity an expensive operation. Despite the high costs, coal and coke were imported to support the industries that depended on them. Water power was another scare source of energy in Los Angeles. While some hydroelectric energy was generated from nearby plants on the Santa Ana and San Gabriel Rivers, inadequate storage facilities resulted in the plants being dependent upon seasonal rains. Petroleum was present in the region, with the Los Angeles-Salt Lake field acting as one of state's leading producers at the time and natural gas was found in moderate levels.

Electric energy offered an attractive source for light and industrial power, with an adequate supply of locally-available petroleum serving as a primary source of energy for generating plants. As the population grew and more and more southern California cities began to develop, there was a rising demand for electric energy to power streets lights, homes, and commercial and industrial

operations. Large scale transportation development, such as the electric railway systems, also fueled the demand for electricity. In response, numerous local companies were formed to produce electric power by steam generating plants supplied by petroleum, and to produce commercial gas from coal and coke supplies that were imported to Los Angeles via rail. While these companies were able to keep up with the demands of light and transportation, they fell short of suppling manufacturing industries.

In 1904, the Los Angeles Gas and Electric Company was organized by a group of investors from San Francisco. Shortly thereafter in 1909, the Southern California Edison Company (SCE) was incorporated. That same year, companies began consolidating in order to expand their capabilities. Of particular significance was SCE's acquisition of the Edison Electric Company, which brought electricity to many of the suburbs located outside of the city. This merger included several local companies including the Pomona and Ontario Light and Fuel Company. Smaller mergers also took place in suburban areas east and south of Los Angeles. The Southern California Gas Company organized in 1910 and acquired the Domestic Gas Company of Los Angeles and the San Bernardino Gas and Electric Company. The Southern Counties Gas Company (SCGC) also organized in 1911 and began to acquire other companies in the San Gabriel Valley and Orange County (Crouch and Dinerman 1964).

In 1917, it was announced that the Pomona Valley (including the cities of Pomona, Covina, Lordsburg, Chino, San Dimas, Azusa, Claremont, and Glendora) would have natural gas as a result of extensive improvements carried out by the SCGC, replacing artificial/manufactured gas in all cities. For several months, crews of men worked to lay 14 miles of an 8-inch main extending from the Brea Canon oil fields to Pomona. The natural gas connected with SCGC's distribution system in Pomona to supply the city and adjacent towns with natural gas, ending the region's dependency on manufactured gas (LAH 1917).

Pomona Gas Plant Site

The Pomona Gas and Electric Light Company was incorporated in 1885 with a capital stock of $50,000 (Light, Heat, and Power 1885). The company manufactured gas from coal and coke, and set up a contract with Sims & Morris of San Francisco to service Pomona's 3,500 residents (Johnston 1887). The plant was located at the corner of Monrovia Avenue and Grace in the industrial district of Pomona, just north of the SPRR main track. Originally, the plant laid pipes for local distribution through the business part of town only. In 1902, the Pomona Gas and Electric Light Company and its plant was sold by owners J. Albert Dole and Arthur M. Dole to the Pomona and Ontario Light and Fuel Company. The new company would introduce a new process that involved using Lowe crude oil gas. A special apparatus used in production of the crude oil was constructed in San Francisco for the Pomona plant, and was said to reduce gas manufacturing costs. The company also made plans to extend the gas mains in Pomona and run new pipelines to

Ontario and Upland (LAT 1902). In 1905, a half-million dollar deal was struck with the Edison Company, in which gas plants at Riverside, Pomona, and Whittier were transferred to Edison as part of its vast expansion of interests throughout Southern California (LAT 1905).

In 1906, SCE erected a new gas tank at its Pomona plant with a capacity of 50,000 cubic feet. The new tank and associated 4-miles of mains cost approximately $30,000 and required a crew of 60 men. In order to accommodate Pomona's rapid growth, a new 8-inch main was slated to be laid from the gas works on Holt Avenue to Eleanor Street (LAT 1906).

Excitement over the new improvements quickly faded, and by 1909, SCE went before the Board of Trade and stated that its Pomona gas plant was losing on profits, citing figures that showed the company expended more than $50,000 in improvements. According to SCE, this expense, in combination with the current rate of gas ($1.15 per one thousand cubic feet), left no money to be made. SCE requested that the gas rate be increased to $1.35 and promised to invest more than $60,000 in additional improvements if the increase was approved (LAT 1909).

The SCGC was organized in 1911 to take over the gas department of the Edison Company. In 1916, after several years of negotiations, several of SCE's properties were purchased by the SCGC for approximately $4 million. The properties included plants in Venice, Santa Monica, Sawtelle, Pomona, Chino, Claremont, Lordsburg, San Dimas, Wilmington, Long Beach, and Seal Beach (LAH 1916). That same year, the company began construction and installation of their Pomona plant. (Historic Record Company 1920).

By 1917, manufactured gas operations ended at the Pomona plant with the development of a 14-mile main between the oil fields in Brea Canon and Pomona, which provided Pomona and surrounding cities like Ontario and Upland with natural gas (LAH 1917). The following year, SCGC made a plea to the State Railroad Commissioners for an increase in gas rates in order to offset the company's increased labor costs associated with the expense of distributing natural gas (LAH 1918). In 1921, the commission approved a rate increase on industrial users of natural gas of 5 cents, a decision that would affect the Eastern District, including Pomona, Whittier, and Monrovia.

In 1919, the Pomona branch of the SCGC was enlarged to include the Ontario-Upland district. It was also announced that the company would extend its mains to the city of Chino, giving the City two main lines of gas supply. The new line would be approximately 3 miles of pipe (American Gas Engineering Journal 1919).

In 1922, it was announced that the SCGC was dismantling its old Pomona plant and replacing it with new buildings, modern machinery, and other new equipment that was expected to be in place by the fall. The rapid expansion of business in the Pomona District rendered the existing plant

inadequate. The proposed improvements included construction of a new garage, meter shop, store room, and several small structures. District Superintendent B.G. Steinruck also announced later that month that the company planned to install approximately 7,000 feet of an 8-inch gas main from the Pomona plant through the entire Pomona industrial district in order to increase the gas supply to that section of the city and in anticipation of future growth. The line would also meet the larger gas demands of the eastern portion of the district, including cities like Chino, Ontario, and Upland (Gas Age-Record 1922).

In 1927, it was announced that high pressure storage holders capable of storing up to 1 million cubic feet of natural gas would be erected at the Pomona, Anaheim, and San Pedro plants for a cost of $125,000 for each site (LAT 1927). In 1928 an additional $35,000 was allotted to the Pomona plant to complete construction of the new gas holder (LAT 1928).

In 1954, SCGC reported that it would spend $533,000 on a new Pomona operating base to service its rapidly growing Eastern Division which added more than 9,400 customers within the last year. The new facility would be located on an 8-acre site at 1540 W. 2nd Street and would replace the current operating base at 148 N. Huntington Avenue. It was further reported that SCGC would dispose of most of its existing base but would retain a 2-acre area for use as a salvage yard (LAT 1954). The new facility officially opened in July 1955.

In 1955, the former gas plant site was sold to the City of Pomona who developed the site for use as its water department operations and maintenance yard. In 1965, the City Water Department would receive two additional parcels from SCGC (LAT 1962), expanding its current corporate yard facility. Table 3 provides a record of the project site's ownership and sale history.

Table 3
Ownership Data for Property within the Project Site

Owner	Sold To	Year Sold	Description of Sale
J. Fletcher Sims	Pomona Gas and Electric Lighting Company	1887	Lot 4 of Block 3, and Lots 4 and 5 of Block 183
Pomona Gas and Electric Lighting Company	Pomona and Ontario Light and Fuel Company	1902	Lot 4 of Block 3, and Lots 4 and 5 of Block 183
A.L. Selig	Pomona and Ontario Light and Fuel Company	1906	Lots 1 and 2 of Block 2
Pomona and Ontario Light and Fuel Company	Edison Electric Company	1906	Lot 4 of Block 3, Lots 4 and 5 of Block 183, and Lots 1 and 2 of Block 2
A.L. Selig	Edison Electric Company	1908	Lots 1 and 2 of Block 2
A.L. Hunsacker	Edison Electric Company	1909	Lots 1, 2, and 3 of Block 3
Edison Electric Company	Southern California Edison Company	1909	All of the above
Southern California Edison Company	Southern Counties Gas Company	1916	All of the above

Table 3
Ownership Data for Property within the Project Site

Owner	Sold To	Year Sold	Description of Sale
Theophile Corbeil	Southern Counties Gas Company	1927	Lots 4 and 5 of Block 2
Malibu Holding Co.	Southern Counties Gas Company	1929	Lot 3 of Block 2
Dwight Noble Higgins	Southern Counties Gas Company	1937	Lot 1 of Block 3, Lot 1 of Block 4, and 180 feet x 66 feet north of Lot 1 of Block 3
Southern Counties Gas Company	City of Pomona	1955	Lot 1 of Block 3, Lot 1 of Block 4, and 180 feet x 66 feet north of Lot 1 of Block 3
Southern Counties Gas Company	City of Pomona	1965	Lots 1 through 5 of Block 2

(Source: Parsons 2004)

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4 CULTURAL RESOURCES SURVEY

4.1 Methods

Dudek Architectural Historian and Archaeologist Samantha Murray, MA, RPA, conducted a pedestrian survey of the project site on September 7, 2016. The project site is almost entirely developed with buildings, structures, and infrastructure associated with the existing water operations department. Therefore, intensive archaeological survey methods (i.e., regularly spaced pedestrian transects) were not warranted. The westernmost parcel (AIN 8348-013-903) on Commercial Street does not contain any standing buildings or structures. However, this parcel has almost no ground surface visibility due to the presence of dry grasses, concrete, and construction debris. All buildings and structures built over 45 years ago were photographed, researched, and evaluated in consideration of CRHR and City of Pomona designation criteria and integrity requirements, and in consideration of potential impacts to historical resources under CEQA. The survey entailed walking all portions of the project site and documenting each building with notes and photographs, specifically noting their character-defining features, spatial relationships, and observed alterations. Access to buildings within the project site was provided by City of Pomona Senior Water Resources Engineer Timotheus Hampton.

Dudek documented the fieldwork using field notes, digital photography, close-scale field maps, and aerial photographs. Photographs of the project site were taken with a Canon Power Shot SD90 digital camera with 12 megapixels and 3x optical zoom. All field notes, photographs, and records related to the current study are on file at Dudek's Pasadena, California, office.

4.2 Description of Surveyed Resources

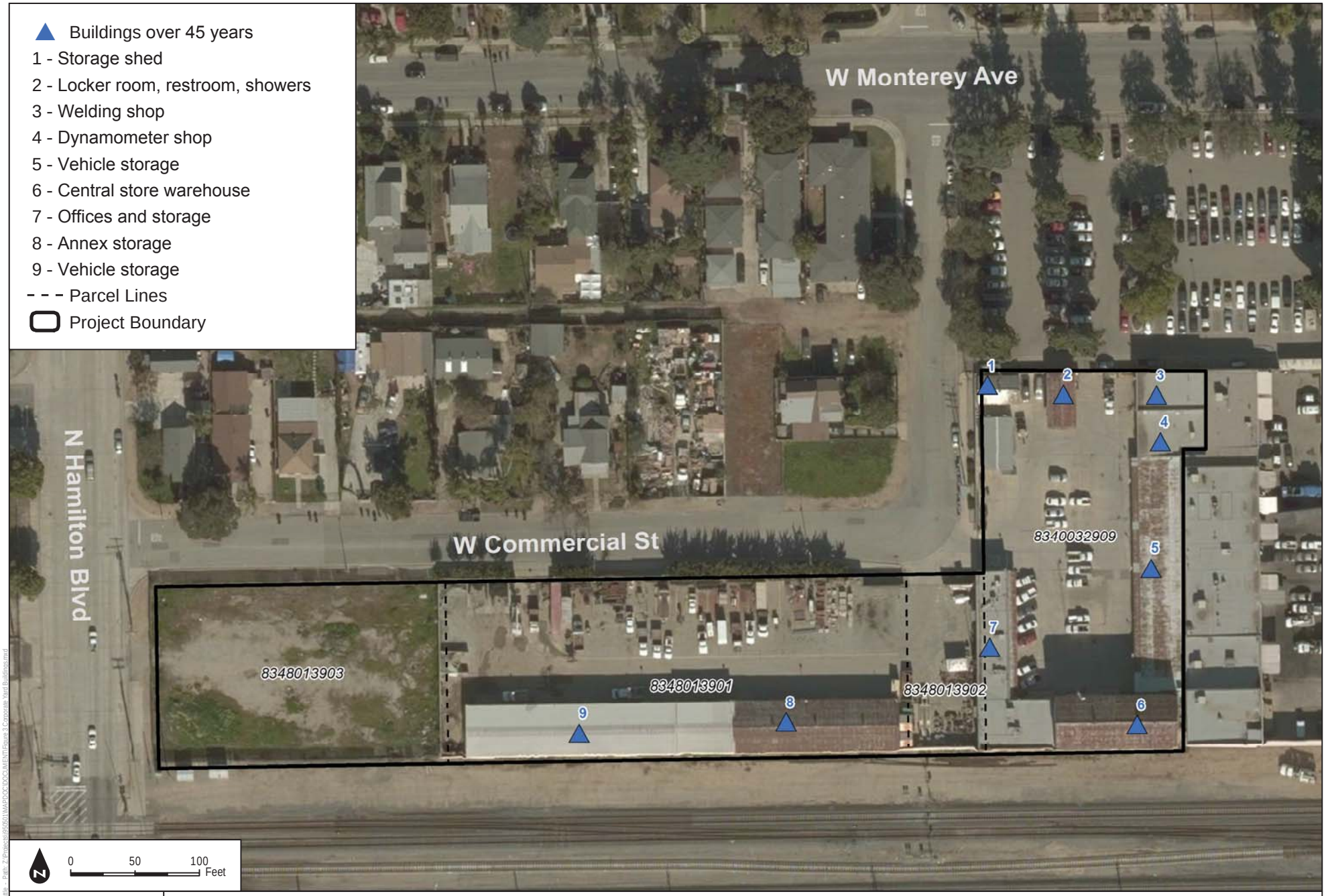
Nine buildings/structures over 45 years of age were identified within the project area as a result of the pedestrian survey (Table 4, Figure 2). The following paragraphs provide a physical description of each building within the project site that was recorded and evaluated for historical significance as part of the former Pomona Gas Plant site. Other studies have referred to the site historically as the Pomona Manufactured Gas Plant site, however, natural gas replaced manufactured gas in 1917. Further, because buildings within the project site are associated with both SCE and SCGC ownership, a specific utility company name has not been used to identify the site. Therefore, the site has been recorded as the Pomona Gas Plant site. The State of California Department of Parks and Recreation Series 523 Forms (DPR forms) for the site are provided in Appendix C.

Table 4
Buildings and Structures Recorded and Evaluated

Map ID No	Current Use	Historic Use	AIN	Built Date*
1	Storage shed	Storage shed for SCGC	8340-032-909	1943-1946
2	Locker room, restroom, showers	Auto washing, lockers, and gas station for SCGC	8340-032-909	1928-1943
3	Welding Shop	Auto repair for SCGC	8340-032-909	1928-1943
4	Dynamometer Shop	Auto repair for SCGC	8340-032-909	1928-1943
5	Vehicle storage	Vehicle storage for SCGC	8340-032-909	c. 1922
6	Central Store Warehouse	Warehouse for SCE and SCGC	8340-032-909	1906-1911
7	Offices and storage	Meter Shop for SCGC	8340-032-909	c. 1922
8	Annex storage	Supplies and storage for SCGC	8348-013-901	1928-1943
9	Vehicle storage	Vehicle storage for City	8348-013-901	1966-1972

*Estimated from Sanborn maps, historic aerial photographs, and archival research. No original building permits were identified.

The Pomona Gas Plant site is located at 148 N. Huntington Street on the southwest corner of Huntington Street and Commercial Street in the City of Pomona. The L-shape site is bounded by Commercial Street to the northwest and an alley to the northeast, the SPRR ROW to the south, Hamilton Boulevard to the west, and adjacent corporate yard buildings to the east. Of the nine buildings over 45 years, 8 buildings are associated with the former SCGC gas plant that existed on the project site between 1916 and 1954. Building 9 was constructed much more recently when the parcel 8348-013-901 came under City ownership (post-1965). Only one building within the project site (Building 6) was constructed when the site was owned by SCE (pre-1916). Figure 2 shows the location of each of the 9 buildings recorded and evaluated.



SOURCE: Bing Maps, 2016

FIGURE 2

Corporate Yard Buildings Recorded and Evaluated

DUDEK

Pomona Corporate Yard Poject

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Building 1 (Photograph 1) is located in the northwestern most corner of the site on AIN 8340-032-909. Historic aerial photographs and Sanborn maps indicate the building was constructed between 1943 and 1946. This prefabricated metal storage building is rectangular in-plan with a side gable roof clad in metal flashing with a metal vent, and measures approximately 640 sf. The building is accessed via a horizontal sliding metal door on the south elevation. A single, four pane window with wooden muntins is also located on the south elevation, and two more of the same type are partially visible on the north elevation. The building appears to function as miscellaneous storage.

Photograph 1. Southeast corner of Building 1

Building 2 (Photograph 2) is located in the north central portion of the site on AIN 8340-032-909. Sanborn maps indicate that the building was constructed between 1928 and 1943. The building is rectangular in-plan with a front gable roof sheathed in corrugated metal panels. The gable is also filled with painted corrugated metal. The rear half of the building is an enclosed concrete masonry structure with a stucco clad exterior. Windows consist of wood-frame, single-hung and awning openings. The roof continues over the front half of the building which functions as a carport/vehicle bay with an air pressure hose for filling tires. This area also provides storage for construction barricades. The roof is supported on the south elevation by two metal posts. Permit records indicated that a gas dispenser island, oil dispensers, and associated underground unleaded gas tank and diesel tank were removed from and below the building in 1999. An adjacent chemical shed was also removed from the west elevation (Permit No. FP-99-010). Other observed alterations include replacement of the original posts that support the front (south) elevation of the roof structure with painted metal posts. It is assumed that the original posts were wood.

Photograph 2. Southwest corner of Building 2

Building 3 (Photograph 3) is located in the northeastern corner of the site on AIN 8340-032-909. Sanborn maps indicate that the building was constructed between 1928 and 1943. The building is rectangular in-plan, with a flat roof structure, and painted concrete block walls. The front (west) elevation has a large industrial garage door with tilt opening. The north elevation contains four multi-pane windows with awning openings. The east and south elevations abut adjacent buildings. The building currently functions as the City Water Department's welding shop and historically functioned as an auto repair bay.

Photograph 3. Northwest corner of Building 3

Building 4 (Photograph 4) is located in the northeastern portion of the site on AIN 8340-032-909 adjacent to Building 3 on the north elevation, and Building 5 on the south elevation. Sanborn maps indicate that the building was constructed between 1928 and 1943. The building is mostly prefabricated metal construction with a painted brick wall on the south elevation, and the adjacent building supporting the north elevation. The front (west) elevation contains two industrial garage tilt doors divided by a corrugated metal panel with a standard door opening. A sign on the front elevation reads “Fabrication and Carpenter Shop.” This building is currently functioning as the City Water Department’s Dynamometer Shop.

Photograph 4. West elevation of Building 4

Building 5 (Photograph 5) is located in the eastern portion of the site on AIN 8340-032-909, adjacent to Building 4 on the north elevation, and Building 6 on the south elevation. Sanborn maps indicate that the structure was constructed between 1911 and 1928. It is assumed that this structure was constructed in 1922 when SCGC proposed numerous improvements to the site which included a new garage, meter shop, store room, and several small structures. The structure is approximately 180 feet long with a side gable, corrugated metal roof supported by metal posts set in raised concrete footings. The posts are spaced to create nine vehicle bays. The two northernmost bays have been covered with metal gates to provide storage for equipment. The rear (east) elevation is comprised of the adjacent building to the east. The structure appears to have always functioned as vehicle storage.

Photograph 5. West elevation of Building 5

Building 6 (Photograph 6) is located in the southeastern corner of the site on AIN 8340-032-909, adjacent to Building 5 on the north elevation, and Building 7 on the west elevation. Sanborn maps indicate that it was built between 1906 and 1911, making it the oldest building on the property. Building 6 is two-stories, rectangular in-plan, with a steel frame, concrete slab foundation, and roof and exterior walls sheathed in corrugated metal panels. The building is approximately 7,600 sf. The front (north) elevation faces into the corporate yard. The ground level features a centrally located industrial metal roll-up door with a wooden loading dock, a horizontal sliding wood door, and a standard entry door with awning and a sign that reads "Storeroom." A larger sign on the center of building reads "Central Receiving." The second story of the north elevation features two small multi-pane windows and a single entry door atop a set of wooden stairs with a simple landing with railing. The south elevation faces the SPRR ROW and features four multi-pane windows with awning openings on the first story. The building is currently used for storage and also has a small classroom space for training purposes. Sanborn maps indicate that they building was originally constructed as part of the SCE Gas Company's Gas Works plant. Observed alterations include the addition of a new entry door, the addition of a new wooden loading dock; new painted metal pipe railings that attached to the exterior of the north elevation; and the addition of a steel lattice tower set in a concrete foundation on the north elevation. Documented alterations include the enclosure od a 23' x 10' room for records storage on the second level in 1947 (Permit No. 17367); and the construction of a 20' x 30' classroom with three new windows on the second level in 1948 (Permit No. 18879).

Photograph 6. Northwest elevation of Building 6

Building 7 (Photograph 7) is located in the eastern portion of the site on AIN 8340-032-909, adjacent to Building 6 on its southeast elevation. Sanborn maps indicate that it was built between 1911 and 1928. It is assumed that this building was constructed in 1922 when SCGC proposed numerous improvements to the site which included a new garage, meter shop, store room, and several small structures. The building is single-story, L-shape in-plan, constructed of brick masonry, and contains approximately 3,950 sf. The north (front) elevation contains two steel sash multi-pane windows with central awning openings, with signage above that reads "Water Dept – City of Pomona." The building is accessed via the east elevation, which contains several entrances accessed via a covered concrete walkway with a wooden canopy sheathed in corrugated metal panels and supported by metal posts. All original doors have been replaced. There are windows of various types and age, including original steel sash multi-pane, and replaced steel sash horizontal sliders. The southeast tail of the building connects to the adjacent warehouse (Building 6). This portion of the building contains a horizontal sliding wooden door set atop a wooden loading dock that does not appear to be original to the property. The west elevation also contains windows of various types and age. Many of the original windows have been removed as evidenced by re-brick patches throughout. Bracketed metal awnings have been added above two windows. Both the east and west elevations reveal numerous brick patches where windows and doors were originally located. The north elevation faces the SPRR ROW and reveals additional brick patches and an industrial wooden door.

The building was originally constructed as a Meter Shop (c. 1922) that included warehouse and office space for the SCGC plant. The building is currently used for office, restroom, and storage space by the City of Pomona Water/Wastewater Operations Department, and has been since the mid-1950s. Many of the major alterations to the building can be attributed to a 1951 remodel of the Meter Shop commissioned by SCGC and completed by Strona Bros. Alterations to the building associated with this remodel include the following (as indicated on the 1951 remodel plans provided by the City archives):

- Removal of an original window and installation of new glazed door with vented steel sash transom in its place on the east elevation
- Removal of original loading dock, ramps, and sliding doors on the east elevation. Then installation of the window removed in the first bullet point, and installation of a new glazed door with vented transom in the existing opening.
- Removal of a pair of sliding doors from the west elevation; installation of Truscon steel sash in their place; and re-bricking of openings on west elevation.
- Removal of an original steel sash window and replacement with a vented Truscon steel sash; and re-bricking of openings on the west elevation.
- Addition of a 100-foot-long concrete walkway and canopy with metal flashing along the east elevation.

Photograph 7. Northeast elevation of Building 7

Building 8 (Photograph 8) is located in the western portion of the site on AIN 8348-013-901, adjacent to Building 9 on its west elevation. Sanborn maps indicate that it was built between 1928 and 1943. The building is a prefabricated industrial metal building measuring approximately 5,120 sf. The building is single-story, rectangular in-plan, and measures approximately 120-feet-long. The building's roof and exterior walls are sheathed in corrugated metal siding. Four horizontal sliding metal doors are located on the north elevation. The east elevation is largely obscured by two small modern sheds. Below the gable is a row of industrial metal sash, multi-pane windows with awning openings. The south elevation faces the SPRR ROW and has been painted over numerous times to cover graffiti. Other than the paint, the exterior of the building appears largely unaltered. The building was originally constructed to provide supply storage as part of the SCGC plant, and continues to serve as storage for the City Water/Wastewater Department.

Photograph 8. Northeast elevation of Building 8

Building 9 (Photograph 9) is located in the western portion of the site on AIN 8348-013-901, adjacent to Building 8 on its east elevation. Historic aerial photographs indicate that it was built between 1966 and 1972. The building measures approximately 8,360 sf and consists of two conjoined prefabricated industrial metal structures, single-story, rectangular in-plan, and measuring approximately 200-feet in total length. The structure contains 9 vehicle storage bays for City maintenance vehicles spaced by metal post and beam supports. The structure contains no windows or doors. The south elevation faces the SPRR ROW and has been painted over numerous

times to cover graffiti. The structure is in poor condition overall with numerous holes observed on the west elevation and a bent roofline.

Photograph 9. North elevation of Building 9

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5 SIGNIFICANCE EVALUATION

5.1 CRHR Eligibility Evaluation

All buildings over 45 years of age within the project site were evaluated for the CRHR as part of the Pomona Gas Plant site. The criteria for listing resources in the CRHR were expressly developed to be in accordance with previously established criteria developed for listing in the NRHP. According to PRC Section 5024.1(c)(1–4), a resource is considered historically significant if it (i) retains "substantial integrity," and (ii) meets at least one of the following criteria.

CRHR Criterion 1: ***Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.***

The Pomona Gas Plant site operated as a manufactured gas plant from 1885 to 1917, and as a natural gas plant from 1917 until 1954 when operations were moved to a new location on Second Street and the City of Pomona acquired the property. The Pomona Gas Plant site saw an evolution of gas technology, beginning with the production of manufactured gas from coal and coke (a process that began in the eastern United States in the early 19th century); transitioning to the Lowe crude oil water gas manufacturing process in 1902; and eventually tapping directly into local natural gas oil fields by 1917. Over the years, the Pomona Gas Plant was owned and operated by various individuals and utility companies; and the site was known by various names. The most significant owners in the plant's history include The Pomona Gas and Electric Lighting Company (1887-1906), Edison Electric Company/Southern California Edison Company (1906-1916), and Southern Counties Gas Company (1916-1955). In 1955, the site was acquired by the City of Pomona and has been utilized as a corporate yard facility for the Water/Wastewater Department ever since.

Changes in gas technology and ownership of the property over the years has resulted in removal of all of the original equipment and buildings associated with the coal and coke manufacturing process, and only one building on the site dates back to the period when the site was owned by SCE (Building 6). Seven buildings on the site (Buildings 1-5, 7, and 8) date back to the period when the site was owned and operated by SCGC, after the transition from manufactured to natural gas. One structure on the site (Building 9) post-dates the gas plant history and was constructed for use by the City in the 1960s.

None of the buildings/structures on the site are associated with the original gas manufacturing process of the late 19th and early 20th centuries, which utilized coal and coke energy resources. The original buildings on the site were likely removed between 1902 and 1906 when the plant began the Lowe crude oil manufacturing process and when Edison took over the property in 1906. The 1906 Sanborn map indicates that the site is "being remodeled." The two-story metal warehouse building (Building 6) appears on 1911 Sanborn maps (indicating that it was constructed between 1906 and 1911), representing the earliest of the existing buildings within the project site. The next buildings to be

constructed were Buildings 5 and 7 (c. 1922). It is assumed that these buildings were constructed in 1922 when SCGC announced its plans to dismantle most of the old equipment on the site and replace it with new buildings and modern machinery including a new garage, meter shop, store room, and several small structures. A small SPRR spur was also constructed by 1928 to provide direct rail access to the plant (no longer extant). The remainder of the buildings and structures appear to have been constructed/moved to the site post-1928 as part of on-going modifications/upgrades to the gas plant site, likely occurring after the plant received its new high pressure storage holders (1927-1928).

While the Pomona Gas Plant site represents an important piece of the City's industrial history, introducing a critically important utility to the City, and providing both manufactured and natural gas to both residents and industrial businesses from 1895 to 1954, the site itself does not convey the important associations with the beginnings of manufactured gas production in the Pomona Valley. Not surprisingly, the Pomona Gas Plant site was constantly evolving to keep up with changes in technology and to meet the needs of a rapidly growing population. While buildings and structures on the site today have been in place for 70-100 years, many suffer from a lack of integrity. Further, nearly all of the equipment associated with manufactured and natural gas procurement have been removed (including the rail spurs), significantly impairing the site's ability to convey its gas plant history. No important historical associations were identified with the site's more recent history as the City Water Department's corporate yard facility (post-1955). Therefore, the Pomona Gas Plant site does not appear eligible under CRHR Criterion 1 for its associations with events.

CRHR Criterion 2: Is associated with the lives of persons important in our past.

While numerous persons are historically associated with the Pomona gas plant site, archival and background research failed to indicate any associations with persons important in history. Therefore, the site does not appear eligible under CRHR Criterion 2.

CRHR Criterion 3: Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values.

The buildings and structures within the Pomona Gas Plant are industrial/utilitarian style buildings with little to no ornamentation. Buildings materials are simple (i.e., metal, brick, or concrete block), and many are prefabricated. Buildings 1, 3, 4, 5, 6, 8, and 9 are ubiquitous, industrial buildings/structures that lack any distinctive styling or features to warrant consideration for architectural significance. Building 2 functions as the shower/locker room and appears to contain most of its original windows and doors. However, this building has been subject to significant alterations including removal of the original gas tank island, replacement of its main supporting posts, and loss of other equipment associated with its former gas plant functions. Building 7 appears to be the only building on the site that was architecturally designed (although the original architect

was not identified) and exhibits some character-defining features of a 1920s industrial office/warehouse building. This building was constructed as the Meter Shop for SCGC c. 1922 when the site was modernized and most of the older buildings were removed. However, this building has been subject to numerous alterations that have significantly compromised much of its original design, style, materials, and workmanship. The building reveals numerous brick patches (re-bricking) where most of the original windows and doors were removed and replaced, and many of these replacements are incompatible with the original design and date of construction. Only the front (north) elevation appears to remain intact. The modifications are further confirmed by remodel plans from 1951 which also indicate that the original loading dock/ramp/doors were entirely removed from the east elevation and that a new concrete walkway and canopy was added. The extent of alterations identified indicate that Building 7 does not retain requisite integrity under this criterion.

While the buildings within the Pomona Gas Plant site still convey their industrial feeling, many are in poor condition and lack distinctive characteristics that would warrant further consideration under this criterion. Building 7 has been heavily altered such that important character-defining features have been impaired. Therefore, the buildings and structures that comprise the Pomona Gas Plant site do not appear eligible CRHR Criterion 3 for architectural merit. Further, none of the buildings appear to warrant individual consideration.

CRHR Criterion 4: Has yielded, or may be likely to yield, information important in prehistory or history.

The buildings and structures on site are unlikely to yield any information important to prehistory or history, nor are they associated with any archaeological resources. Therefore, the Pomona Gas Plant site does not appear eligible for listing under CRHR Criterion 4.

5.1.1 Integrity Considerations

Integrity is the authenticity of a historical resource's physical identity evidenced by the survival of characteristics that existed during the resource's period of significance. Historical resources eligible for listing in the CRHR must meet one of the criteria of significance discussed in Section 5.1 and retain enough of their historic character or appearance to be recognizable as historical resources and to convey the reasons for their significance. Integrity is evaluated with regard to the retention of location, design, setting, materials, workmanship, feeling, and association. Furthermore, integrity must be judged with reference to the particular criteria under which a resource is proposed for eligibility (OHP 2011).

Location: The existing Pomona Gas Plant buildings and structures have always occupied the same location. While various functions may have changed within the buildings themselves, their location remains unchanged. Therefore, the site retains integrity of location.

Design: Design is the combination of elements that create the form, plan, space, structure, and style of a property. A site that retains integrity of design should reflect its historic functions and associated technology. Because the site's organization of space changed along with its function in the mid-1950s, including removal of the original gas plant equipment and modification of buildings, the site as a whole does not appear to retain integrity of its original design. Further, the main office building, or Meter Shop (Building 7), which represents the only architecturally designed building within the plant has been significantly altered such that its original pattern of fenestration and many original details have been lost.

Setting: The site's larger setting appears to have always been a mixture of industrial, residential, and commercial development. Up until the early 1940s, the Covina Branch of the SPRR traveled north from the main track along White Avenue. Historic aerial photographs show that by 1946, this line was no longer extant. Further, the spur lines that once provided direct access to the property from the SPRR appear to have been removed. Sanborn maps indicate that residential properties have been located north and west of the site since 1895, originally appearing quite sparse and eventually becoming much denser by the 1940s. The eastern portion of parcel 8340-032-909 (adjacent to the current project area) contains the NRHP-listed Pomona City Stable building, which has been in place since 1909. Therefore, while there have been some changes to the immediate setting with regard to specific buildings and structures on the subject parcels, the site's setting remains largely intact.

Materials: Most of the buildings and structures within the Pomona Gas Plant site consist of simple materials such as corrugated steel, concrete block, and brick. Most of the buildings appear to retain their original materials but have been subject to various alterations over the years.

Workmanship: Workmanship is the physical evidence of a craft. None of the buildings within the site show evidence of a particular craft or skill due in large part to their ubiquitous nature and/or degree of alteration.

Feeling: While the Pomona Gas Plant site does evoke some sense of old industrial, it does not express a particular period of time, function, or historic character. Nor does it clearly identify itself as a historic gas plant site. Therefore, the site does not retain integrity of feeling.

Association: The site is not associated with any important historic events or people.

5.2 Pomona Historic Landmark Eligibility Evaluation

The Pomona Historic Preservation Commission and City Council may designate a site as a historic landmark if the buildings are fifty (50) or more years old and meet one or more of the following designation criteria:

1. It exemplifies or reflects special elements of the city of Pomona's cultural, social, economic, political, aesthetic, engineering, architectural, or natural history;

While the buildings and structures within the Pomona Gas Plant site convey a general sense of the City's history of industrial development based on their industrial/utilitarian architecture and their historic relationship to the adjacent SPRR tracks, they do not reflect "special elements" of the City's industrial history. The Pomona Gas Plant site has undergone significant modifications over the years, including removal of all of the original gas plant equipment. For this reason, the site no longer speaks to the City's early development of utilities/energy resources. Therefore, the site does not appear eligible under City Criterion 1.

2. It is identified with persons or events significant in local, state, or national history;

As discussed above under CRHR Criterion 2, archival and background research failed to indicate any associations with persons important in history. As discussed above under CRHR Criterion 1, the Pomona Gas Plant site does not convey the important associations with the beginnings of manufactured gas production in the Pomona Valley. Not surprisingly, the Pomona Gas Plant site was constantly evolving to keep up with changes in technology and to meet the needs of a rapidly growing population. While buildings and structures on the site today have been in place for 70-100 years, many suffer from a lack of integrity. Further, nearly all of the equipment associated with manufactured and natural gas procurement have been removed (including the rail spurs), significantly impairing the site's ability to convey its gas plant history. No important historical associations with events were identified with the site's more recent history as the City Water Department's corporate yard facility (post-1955). Therefore, the site does not appear eligible under City Criterion 2.

3. It embodies distinctive characteristics of a style, type, period, or method of construction, or is a valuable example of the use of indigenous materials or craftsmanship;

As discussed above under CRHR Criterion 3, the buildings and structures within the Pomona Gas Plant site are industrial/utilitarian style buildings with little to no ornamentation. Buildings materials are simple (i.e., metal, brick, or concrete block), and many are prefabricated. While the buildings within the Pomona Gas Plant site still convey their industrial feeling, many are in poor condition and lack distinctive characteristics that would warrant further consideration under this criterion. Further, the lack of associated gas plant equipment on the site hinders their ability to convey significant associations with the gas plant. Building 7 is the only designed building on the site, and it has been heavily altered such that important character-defining features have been impaired. Therefore, the buildings and structures that comprise the Pomona Gas Plant site do not appear eligible under City Criterion 3 for architectural merit.

4. It contributes to the significance of an historic area, being a geographically definable area possessing a concentration of historic or scenic properties or thematically related grouping of properties which contribute to each other and are unified aesthetically by plan or physical development;

The Pomona Gas Plant site is not part of an identified historic district, nor does it constitute an historic district in its own right. Therefore, the site does not appear eligible under City Criterion 4.

5. It is the work of a notable builder, designer, landscape designer or architect;

Archival and building development research failed to reveal the names of any specific builders, designers, or architects associated with the buildings on the site. Therefore, the site does not appear eligible under City Criterion 5.

6. It has a unique location or singular physical characteristics or is a view or vista representing an established and familiar visual feature of a neighborhood, community, or the city of Pomona;

The Pomona Gas Plant site does not have a unique location, nor does it offer a view or vista that is an established feature of the community. The site is located in an area of mixed residential and industrial development and is not located in an area that is easily seen by the community. The site is located behind walls/gates and does not offer itself for public viewing. While the southern boundary of the site is visible from the SPRR ROW, the southern elevation of the buildings is not particularly unique and is partially obscured by paint and graffiti. Therefore, the site does not appear eligible under City Criterion 6.

7. It embodies elements of architectural design, detail, materials, or craftsmanship that represent a significant structural or architectural achievement or innovation;

Nearly all of the buildings within the Pomona Gas Plant are prefabricated, industrial buildings. They are a ubiquitous resource type and do not embody elements of architectural design, detail, materials, or craftsmanship. The only building that could qualify under this criterion is Building 7, which appears to be the only designed building on the property. However, Building 7 has been substantially altered and no longer retains integrity of its original design, as evidenced by extensive re-bricking throughout, where original windows and doors were replaced, removal of the original loading dock/ramp/doors, and the addition of a concrete walkway and canopy structure. Therefore, the site does not appear eligible under City Criterion 7.

8. It is similar to other distinctive properties, sites, areas, or objects based on an historic, cultural, or architectural motif;

The site is not known to be similar to other distinctive properties based on any historic, cultural, or architectural motif. Therefore, the site does not appear eligible under City Criterion 8.

9. It reflects significant geographical patterns, including those associated with different eras of settlement and growth, particular transportation modes, or distinctive examples of park or community planning;

The Pomona Gas Plant site does not reflect significant geographical patterns associated with the City's industrial development and growth. Numerous industrial properties including citrus packing houses, manufacturing companies, and mills were established along the SPRR in Pomona during late 19th and early 20th centuries. While the Pomona Gas Plant site appears to be one of the earlier industrial properties to have appeared along railroad in that portion of the City, it is no longer recognizable to that era, and does not convey the history of industrial development that peaked during the early- to mid-part of the 20th century. A good example of this is the Edison Historic District located a few blocks to the southeast on the 500 and 600 blocks of Second Street. Therefore, the site does not appear eligible under City Criterion 9.

10. It is one of the few remaining examples in the city of Pomona, region, state, or nation possessing distinguishing characteristics of an architectural or historical type or specimen.

The Pomona Gas Plant site is not a rare or significant example of a gas plant site. SCE and SCGC erected plants all over Southern California during the late 19th and early 20th centuries. Further, the plant in Pomona is not a particularly good example, as all of the associated plant equipment has been removed, thereby eliminating important connections to this site's former function. Further, as previously discussed, the site does not possess distinguishing architectural characteristics. Therefore, the site does not appear eligible under City Criterion 10.

5.3 Conclusions

As a result of the significance evaluation, including consideration of CRHR and City of Pomona evaluation criteria and integrity requirements, the Pomona Gas Plant site does not appear eligible for inclusion in the CRHR, nor does it appear to warrant consideration as a City of Pomona Historic Landmark.

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6 SUMMARY AND MANAGEMENT RECOMMENDATIONS

6.1 Summary of Findings

6.1.1 Built Environment

Nine buildings within the project site were evaluated for historical significance as part of the Pomona Gas Plant site. As a result of the evaluation, the site was found not eligible for inclusion in the CRHR. Further, the site does not appear to warrant consideration as a City of Pomona Historic Landmark. Therefore, the proposed project will have a less than significant impact on historical resources under CEQA. No further mitigation is required for historical resources.

6.1.2 Archaeology

No archaeological resources were identified within the project site as a result of the CHRIS records search, Native American coordination, or survey. However, it is always possible that intact archaeological deposits are present at subsurface levels. For these reasons, the project site should be treated as potentially sensitive for archaeological resources. Management recommendations to reduce potential impacts to unanticipated archaeological resources and human remains during campus construction activities are provided below.

6.2 Management Recommendations

6.2.1 Unanticipated Discovery of Archaeological Resources

In the event that archaeological resources (sites, features, or artifacts) are exposed during construction activities for the proposed project, all construction work occurring within 100 feet of the find shall immediately stop until a qualified archaeologist, meeting the Secretary of the Interior's Professional Qualification Standards, can evaluate the significance of the find and determine whether or not additional study is warranted. Depending upon the significance of the find under CEQA (14 CCR 15064.5(f); PRC Section 21082), the archaeologist may simply record the find and allow work to continue. If the discovery proves significant under CEQA, additional work, such as preparation of an archaeological treatment plan, testing, or data recovery may be warranted.

6.2.2 Unanticipated Discovery of Human Remains

In accordance with Section 7050.5 of the California Health and Safety Code, if human remains are found, the County Coroner shall be immediately notified of the discovery. No further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains shall occur until the County Coroner has determined, within 2 working days of notification of the

discovery, the appropriate treatment and disposition of the human remains. If the County Coroner determines that the remains are, or are believed to be, Native American, he or she shall notify the NAHC in Sacramento within 24 hours. In accordance with California Public Resources Code, Section 5097.98, the NAHC must immediately notify those persons it believes to be the most likely descendant from the deceased Native American. The most likely descendant shall complete their inspection within 48 hours of being granted access to the site. The designated Native American representative would then determine, in consultation with the property owner, the disposition of the human remains.

7 REFERENCES

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CONFIDENTIAL

APPENDIX A

Records Search Results

APPENDIX B

NAHC and Native American Coordination

NATIVE AMERICAN HERITAGE COMMISSION
1550 Harbor Blvd., Suite 100
West Sacramento, CA 95691
(916) 373-3710
(916) 373-5471 FAX

August 4, 2016

Samantha Murray, M.A., RPA
Dudek

Sent by E-mail: smurray@dudek.com

RE: Proposed Pomona Corporate Yard Facility Project (Project # 9505), City of Pomona; San Dimas USGS Quadrangle, Los Angeles County, California

Dear Ms. Murray:

Attached is a contact list of tribes with traditional lands or cultural places located within the boundaries of the above referenced counties. A search of the SFL was completed for the USGS quadrangle information provided with negative results.

Our records indicate that the lead agency for this project has not requested a Native American Consultation List for the purposes of formal consultation. Lists for cultural resource assessments are different than consultation lists. Please note that the intent of the referenced codes below is to avoid or mitigate impacts to tribal cultural resources, as defined, for California Environmental Quality Act (CEQA) projects under AB-52.

As of July 1, 2015, Public Resources Code Sections 21080.3.1 and 21080.3.2 **require public agencies** to consult with California Native American tribes identified by the Native American Heritage Commission (NAHC) for the purpose mitigating impacts to tribal cultural resources:

> **Within 14 days** of determining that an application for a project is complete or a decision by a public agency to undertake a project, the lead agency shall provide formal notification to the designated contact of, or a tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, which shall be accomplished by means of at least one written notification that includes a brief description of the proposed project and its location, the lead agency contact information, and a notification that the California Native American tribe has 30 days to request consultation pursuant to this section. (Public Resources Code Section 21080.3.1(d))

The law does not preclude agencies from initiating consultation with the tribes that are culturally and traditionally affiliated with their jurisdictions. The NAHC believes that in fact that this is the best practice to ensure that tribes are consulted commensurate with the intent of the law.

In accordance with Public Resources Code Section 21080.3.1(d), formal notification must include a brief description of the proposed project and its location, the lead agency contact information, and a notification that the California Native American tribe has 30 days to request consultation. The NAHC believes that agencies should also include with their notification letters information regarding any cultural resources assessment that has been completed on the APE, such as:

1. The results of any record search that may have been conducted at an Information Center of the California Historical Resources Information System (CHRIS), including, but not limited to:

   - A listing of any and all known cultural resources have already been recorded on or adjacent to the APE;
   - Copies of any and all cultural resource records and study reports that may have been provided by the Information Center as part of the records search response;
   - If the probability is low, moderate, or high that cultural resources are located in the APE.

- Whether the records search indicates a low, moderate or high probability that unrecorded cultural resources are located in the potential APE; and
- If a survey is recommended by the Information Center to determine whether previously unrecorded cultural resources are present.

2. The results of any archaeological inventory survey that was conducted, including:

   - Any report that may contain site forms, site significance, and suggested mitigation measurers.
   - All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum, and not be made available for pubic disclosure in accordance with Government Code Section 6254.10.

3. The results of any Sacred Lands File (SFL) check conducted through Native American Heritage Commission.

4. Any ethnographic studies conducted for any area including all or part of the potential APE; and

5. Any geotechnical reports regarding all or part of the potential APE.

Lead agencies should be aware that records maintained by the NAHC and CHRIS is not exhaustive, and a negative response to these searches does not preclude the existence of a cultural place. A tribe may be the only source of information regarding the existence of a tribal cultural resource.

This information will aid tribes in determining whether to request formal consultation. In the case that they do, having the information beforehand well help to facilitate the consultation process.

The results of these searches and surveys should be included in the "Tribal Cultural Resources" subsection of the Cultural Resources section of the environmental document submitted for review.

If you receive notification of change of addresses and phone numbers from tribes, please notify me. With your assistance we are able to assure that our consultation list contains current information.

If you have any questions, please contact me at my email address: gayle.totton@nahc.ca.gov.

Sincerely,

Gayle Totton, M.A., PhD.
Associate Governmental Program Analyst

Native American Heritage Commission
Native American Contact List
Los Angeles County
8/4/2016

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

Gabrieleno/Tongva San Gabriel Band of Mission Indians
Anthony Morales, Chairperson
P.O. Box 693 Gabrielino
San Gabriel, CA, 91778
Phone: (626) 483 - 3564
Fax: (626)286-1262
GTTribalcouncil@aol.com

Gabrielino /Tongva Nation
Sandonne Goad, Chairperson
106 1/2 Judge John Aiso St., #231 Gabrielino
Los Angeles, CA, 90012
Phone: (951)807-0479
sgoad@gabrielino-tongva.com

Gabrielino Tongva Indians of California Tribal Council
Robert F. Dorame, Chairperson
P.O. Box 490 Gabrielino
Bellflower, CA, 90707
Phone: (562)761-6417
Fax: (562)761-6417
gtongva@verizon.net

Gabrielino-Tongva Tribe
Linda Candelaria, Co-Chairperson
1999 Avenue of the Stars, Suite 1100 Gabrielino
Los Angeles, CA, 90067
Phone: (626) 676 - 1184

This list is current only as of the date of this document. Distribution of this list does not relieve any person of statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resource Section 5097.98 of the Public Resources Code.

This list is only applicable for contacting local Native Americans with regard to cultural resources assessment for the proposed Pomona Corporate Yard Facility (Project# 9505), Los Angeles County.

DUDEK

38 NORTH MARENGO
PASADENA, CALIFORNIA 91101
T 626.674.6864

August 4, 2016

Ms. Linda Candelaria , Chairwoman
Gabrielino-Tongva Tribe
1999 Avenue of the Stars #1100
Los Angeles, CA 90067

Subject: ***Cultural Resources Study for the Corporate Yard Facility Project, City of Pomona, California.***

Dear Ms. Candelaria,

Dudek has been retained by the City of Pomona to prepare a cultural resources study for the Corporate Yard Facility Project (the proposed project) located at 148 North Huntington Street in the City of Pomona, California. As part of the process of identifying cultural resources issues for this project, Dudek contacted the California Native American Heritage Commission (NAHC) to request a Sacred Lands File (SLF) search and a list of Native American individuals and/or tribal organizations who may have knowledge of cultural resources in or near the project area. The SLF search was negative for the presence of Native American cultural resources in the immediate project area. However, the NAHC recommended that we coordinate with you directly regarding your knowledge of the presence of cultural resources that may be impacted by this project.

Project Description and Location

The proposed project involves the construction of a new, consolidated water and wastewater operations corporate yard facility on the site of the existing corporate yard facility, located at 148 North Huntington Street in the City of Pomona. While the corporate yard is currently in operation at this site, in anticipation of extension remediation efforts that will be required on site for contamination associated with a former manufactured gas plant (MGP), existing operations will be relocated temporarily and then ultimately reconsolidated at the project site.

The project site is generally located in the northwestern portion of the City of Pomona, within the eastern portion of Los Angeles County. The L-shaped site, which consists of four parcels (APNs 8340-032-909, 8348-013-901, 8348-013-902, and 8348-013-903), is specifically located at 148 North Huntington Street and is bound to the north by West Monterey Avenue and West Commercial Street, to the south by the Southern Pacific Railroad tracks, to the west by North Hamilton Boulevard and North Huntington Street, and to the east by industrial uses fronting North White Avenue. The site falls within an unsectioned portion of Township 1 South, Range 8 West of the San Dimas U.S. Geological Service 7.5-minute series topographic Quadrangle map (see attached Project Location Map).

If you have knowledge of cultural resources that may exist within or near the project area, please contact me directly at (626) 204-9826, smurray@dudek.com, or at the above address at your earliest convenience.

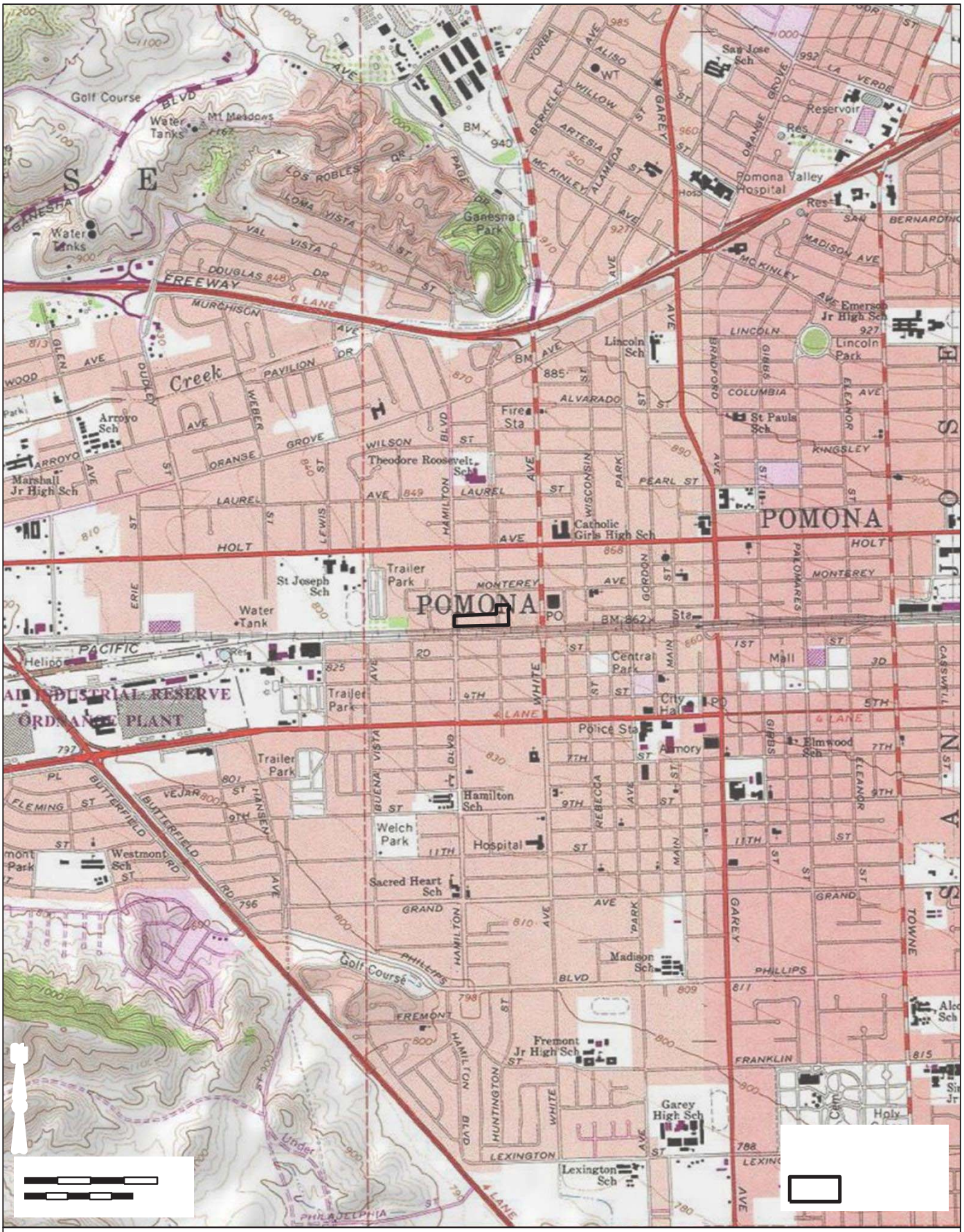
Please note that this letter does not constitute Assembly Bill (AB) 52 notification or initiation of consultation. AB 52 is a process between the CEQA lead agency and California Native American Tribes concerning potential impacts to tribal cultural resources. Tribes that wish to be notified of projects for the purposes of AB 52 must contact the CEQA lead agency in writing pursuant to Public Resources Code Section 21080.3.1(b).

Thank you for your assistance.

Sincerely,

Samantha Murray, M.A., RPA
Archaeologist

Attachment: Project Location Map



SOURCE: USGS 7.5-Minute Series San Dimas Quadrangle Township 1S; Range 8W, 9W; Sections 19, 24, 25, 30

Project Location Map

Pomona Corporate Yard Facility Project

DUDEK

38 NORTH MARENGO
PASADENA, CALIFORNIA 91101
T 626.674.6864

August 4, 2016

Mr. Robert F. Dorame , Tribal Chair/Cultural Resources
Gabrieleno Tongva Indians of California Tribal Council
P.O. Box 490
Bellflower, CA 90707

Subject: ***Cultural Resources Study for the Corporate Yard Facility Project, City of Pomona, California.***

Dear Mr. Dorame,

Dudek has been retained by the City of Pomona to prepare a cultural resources study for the Corporate Yard Facility Project (the proposed project) located at 148 North Huntington Street in the City of Pomona, California. As part of the process of identifying cultural resources issues for this project, Dudek contacted the California Native American Heritage Commission (NAHC) to request a Sacred Lands File (SLF) search and a list of Native American individuals and/or tribal organizations who may have knowledge of cultural resources in or near the project area. The SLF search was negative for the presence of Native American cultural resources in the immediate project area. However, the NAHC recommended that we coordinate with you directly regarding your knowledge of the presence of cultural resources that may be impacted by this project.

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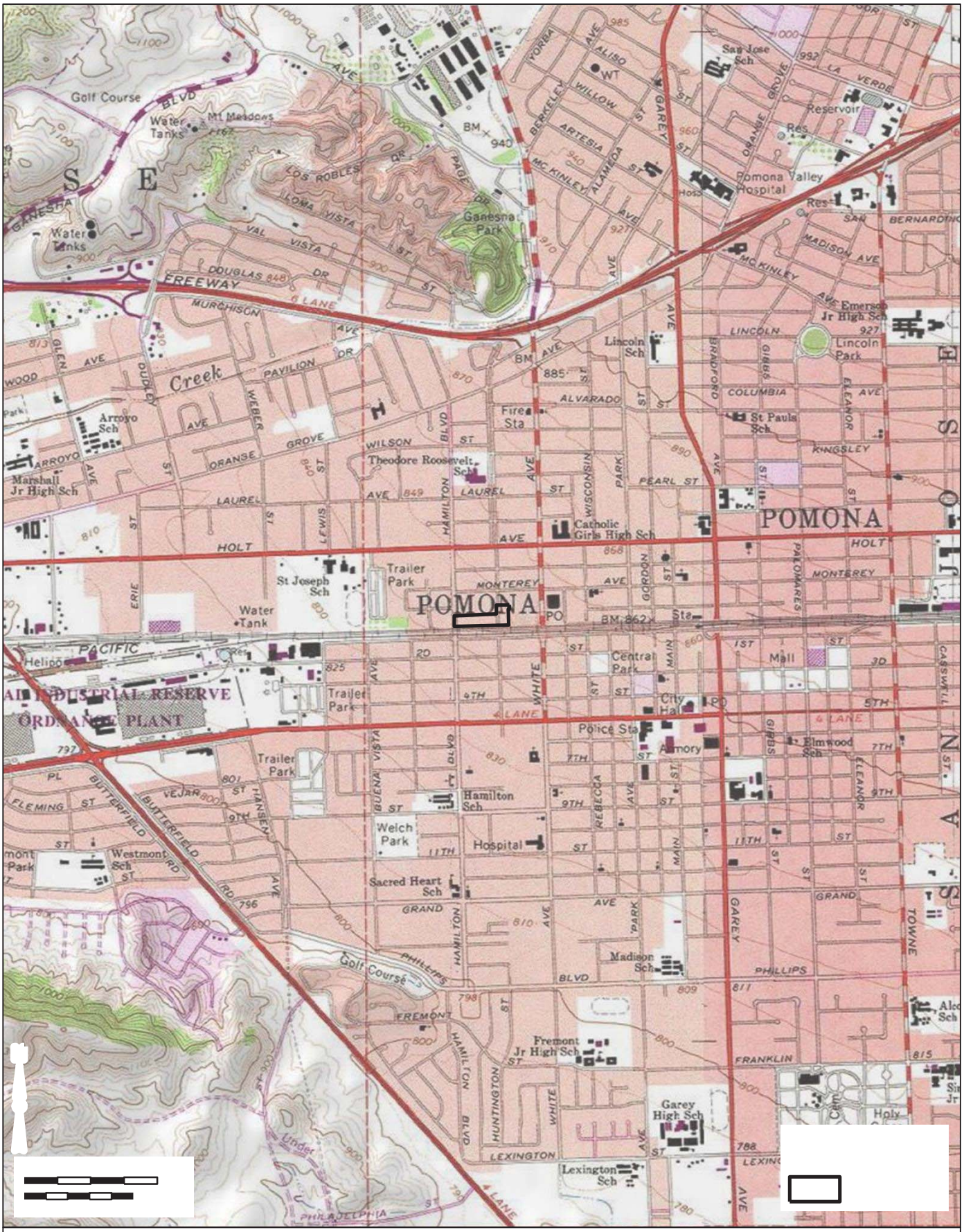
Thank you for your assistance.

Sincerely,

Samantha Murray, M.A., RPA
Archaeologist

Attachment: Project Location Map



SOURCE: USGS 7.5-Minute Series San Dimas Quadrangle Township 1S; Range 8W, 9W; Sections 19, 24, 25, 30

Project Location Map

Pomona Corporate Yard Facility Project

DUDEK

38 NORTH MARENGO
PASADENA, CALIFORNIA 91101
T 626.674.6864

August 4, 2016

Ms. Sandonne Goad , Chairperson
Gabrielino-Tongva Nation
106 1/2 Judge John Also St.
Los Angeles, CA 90012

Subject: ***Cultural Resources Study for the Corporate Yard Facility Project, City of Pomona, California.***

Dear Ms. Goad,

Dudek has been retained by the City of Pomona to prepare a cultural resources study for the Corporate Yard Facility Project (the proposed project) located at 148 North Huntington Street in the City of Pomona, California. As part of the process of identifying cultural resources issues for this project, Dudek contacted the California Native American Heritage Commission (NAHC) to request a Sacred Lands File (SLF) search and a list of Native American individuals and/or tribal organizations who may have knowledge of cultural resources in or near the project area. The SLF search was negative for the presence of Native American cultural resources in the immediate project area. However, the NAHC recommended that we coordinate with you directly regarding your knowledge of the presence of cultural resources that may be impacted by this project.

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Thank you for your assistance.

Sincerely,

Samantha Murray, M.A., RPA
Archaeologist

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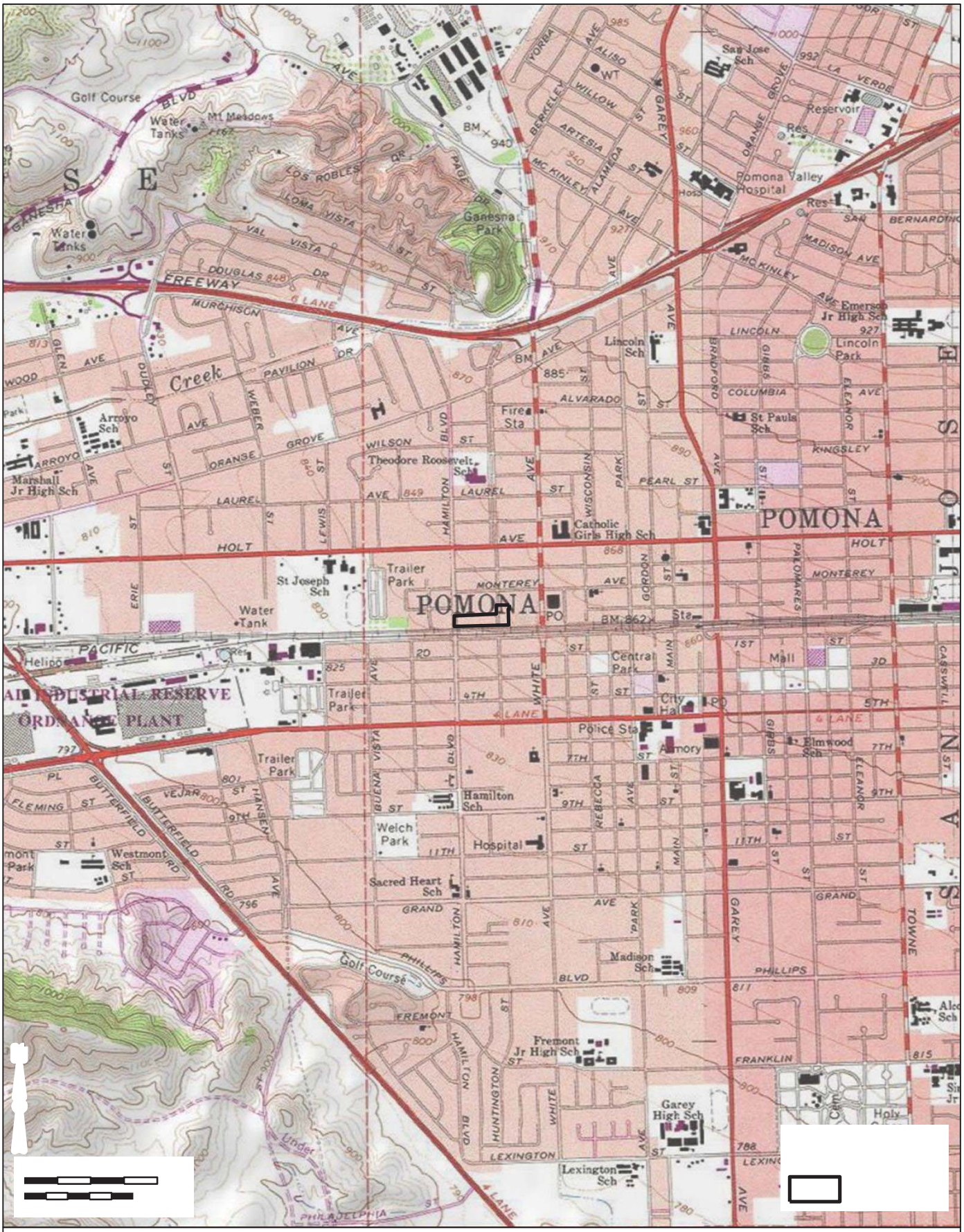

SOURCE: USGS 7.5-Minute Series San Dimas Quadrangle Township 1S; Range 8W, 9W; Sections 19, 24, 25, 30

Project Location Map

Pomona Corporate Yard Facility Project

DUDEK

38 NORTH MARENGO
PASADENA, CALIFORNIA 91101
T 626.674.6864

August 4, 2016

Mr. Anthony Morales , Chairperson
Gabrieleno/Tongva San Gabriel Band of Mission Indians
P.O. Box 693
San Gabriel, CA 91778

Subject: ***Cultural Resources Study for the Corporate Yard Facility Project, City of Pomona, California.***

Dear Mr. Morales,

Dudek has been retained by the City of Pomona to prepare a cultural resources study for the Corporate Yard Facility Project (the proposed project) located at 148 North Huntington Street in the City of Pomona, California. As part of the process of identifying cultural resources issues for this project, Dudek contacted the California Native American Heritage Commission (NAHC) to request a Sacred Lands File (SLF) search and a list of Native American individuals and/or tribal organizations who may have knowledge of cultural resources in or near the project area. The SLF search was negative for the presence of Native American cultural resources in the immediate project area. However, the NAHC recommended that we coordinate with you directly regarding your knowledge of the presence of cultural resources that may be impacted by this project.

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Thank you for your assistance.

Sincerely,

Samantha Murray, M.A., RPA
Archaeologist

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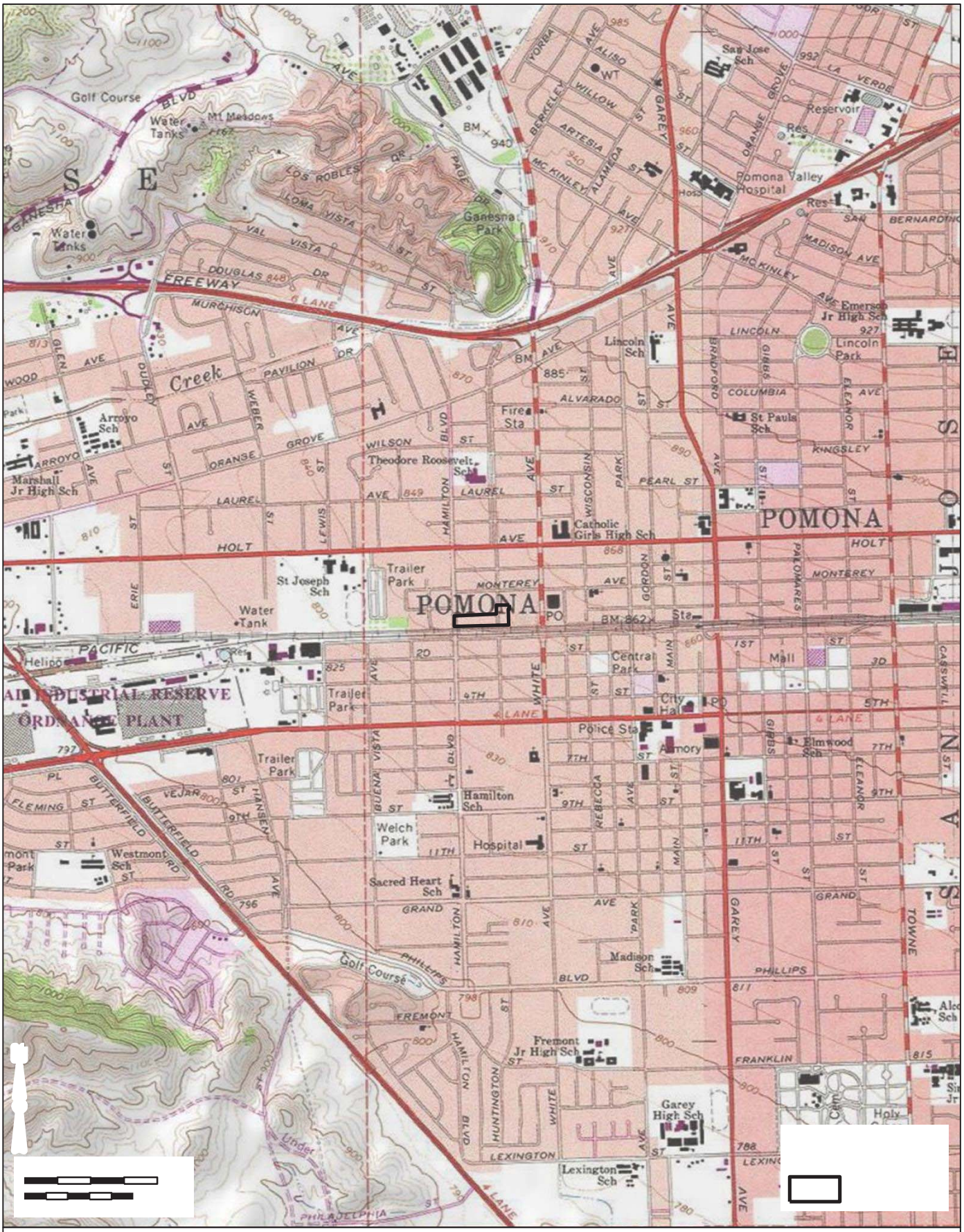

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Project Location Map

Pomona Corporate Yard Facility Project

DUDEK

38 NORTH MARENGO
PASADENA, CALIFORNIA 91101
T 626.674.6864

August 4, 2016

Mr. Andrew Salas , Chairperson
Gabrieleno Band of Mission Indians
P.O. Box 393
Covina, CA 91723

Subject: ***Cultural Resources Study for the Corporate Yard Facility Project, City of Pomona, California.***

Dear Mr. Salas,

Dudek has been retained by the City of Pomona to prepare a cultural resources study for the Corporate Yard Facility Project (the proposed project) located at 148 North Huntington Street in the City of Pomona, California. As part of the process of identifying cultural resources issues for this project, Dudek contacted the California Native American Heritage Commission (NAHC) to request a Sacred Lands File (SLF) search and a list of Native American individuals and/or tribal organizations who may have knowledge of cultural resources in or near the project area. The SLF search was negative for the presence of Native American cultural resources in the immediate project area. However, the NAHC recommended that we coordinate with you directly regarding your knowledge of the presence of cultural resources that may be impacted by this project.

Project Description and Location

The proposed project involves the construction of a new, consolidated water and wastewater operations corporate yard facility on the site of the existing corporate yard facility, located at 148 North Huntington Street in the City of Pomona. While the corporate yard is currently in operation at this site, in anticipation of extension remediation efforts that will be required on site for contamination associated with a former manufactured gas plant (MGP), existing operations will be relocated temporarily and then ultimately reconsolidated at the project site.

The project site is generally located in the northwestern portion of the City of Pomona, within the eastern portion of Los Angeles County. The L-shaped site, which consists of four parcels (APNs 8340-032-909, 8348-013-901, 8348-013-902, and 8348-013-903), is specifically located at 148 North Huntington Street and is bound to the north by West Monterey Avenue and West Commercial Street, to the south by the Southern Pacific Railroad tracks, to the west by North Hamilton Boulevard and North Huntington Street, and to the east by industrial uses fronting North White Avenue. The site falls within an unsectioned portion of Township 1 South, Range 8 West of the San Dimas U.S. Geological Service 7.5-minute series topographic Quadrangle map (see attached Project Location Map).

If you have knowledge of cultural resources that may exist within or near the project area, please contact me directly at (626) 204-9826, smurray@dudek.com, or at the above address at your earliest convenience.

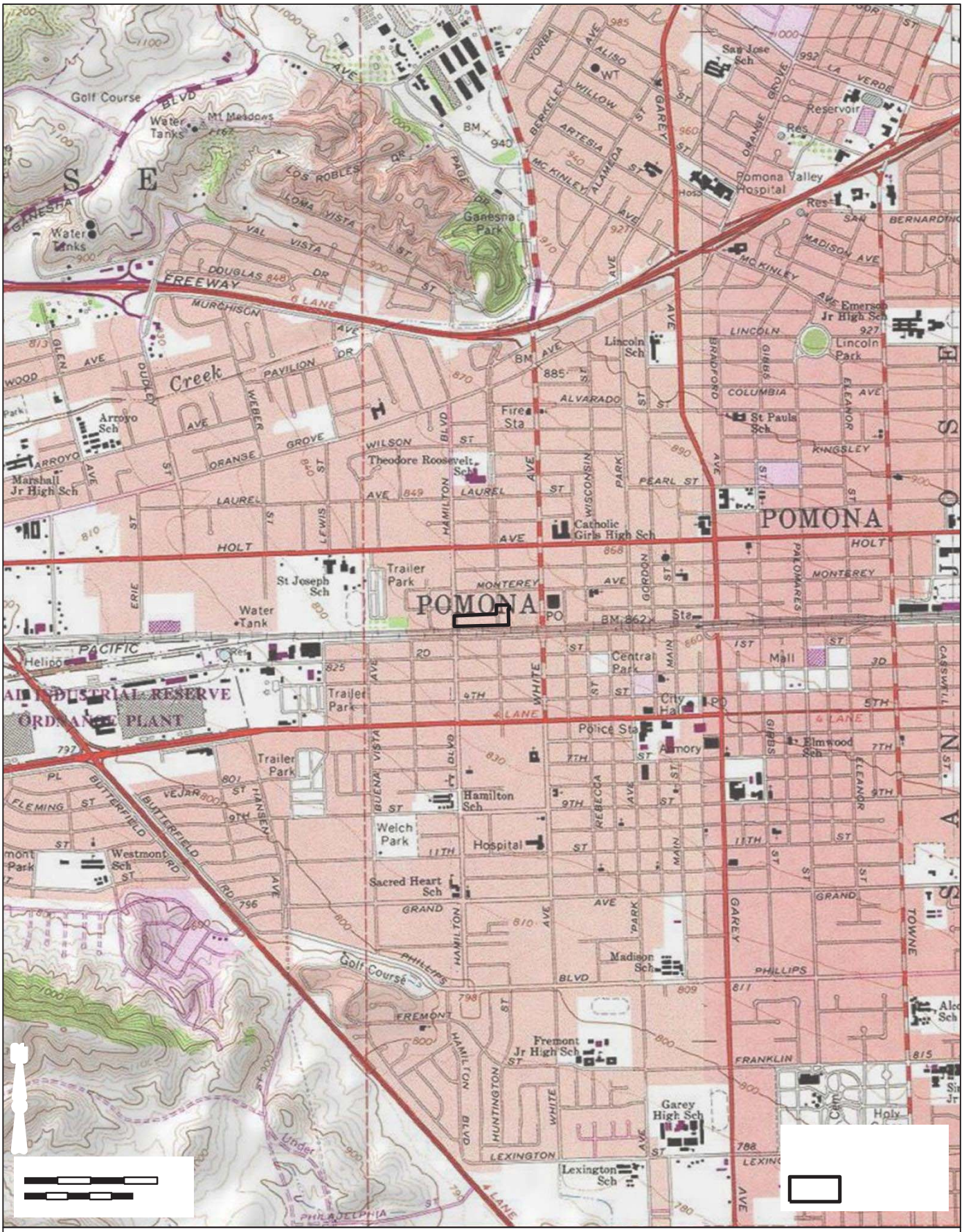
Please note that this letter does not constitute Assembly Bill (AB) 52 notification or initiation of consultation. AB 52 is a process between the CEQA lead agency and California Native American Tribes concerning potential impacts to tribal cultural resources. Tribes that wish to be notified of projects for the purposes of AB 52 must contact the CEQA lead agency in writing pursuant to Public Resources Code Section 21080.3.1(b).

Thank you for your assistance.

Sincerely,

Samantha Murray, M.A., RPA
Archaeologist

Attachment: Project Location Map



SOURCE: USGS 7.5-Minute Series San Dimas Quadrangle Township 1S; Range 8W, 9W; Sections 19, 24, 25, 30

Project Location Map

Pomona Corporate Yard Facility Project

Samantha Murray

From: Gabrieleno Band of Mission Indians <gabrielenoindians@yahoo.com>
Sent: Saturday, August 13, 2016 4:23 PM
To: Samantha Murray
Subject: Subject Cultural Resources Study for the Corporate Yard Facility Project, City of Pomona California
Attachments: Subject Cultural Resources Study for the Corporate Yard Facility Project, City of Pomona California .docx

Gabrieeño Indian Metates

Dear Samantha Murray
please see attachment

this info was from a site near by
Gabrieleno Indians Metates

A metate is a shallow grinding bowl in which nuts and seeds were ground by milling with a small stone held in the hand and moved in a rhythmic motion. The meal produced by the grinding was an important staple in the Indian diet.
In May 1974 two metates were discovered when construction workers were digging the foundation for the College of Science building. Anthropologists estimate that the metates could be anywhere from 200 to 7,000 years old. The bowls were unearthed along an alluvial plane indicating that they could have been washed down from the area now occupied by the Mount San Antonio Junior College where the existence of an established Indian encampment has been verified. It is believed that the Gabrielino Indians visited the area which is now the Cal Poly campus in search of acorns.
The two metates are stored in the University Archives. The measurements and weights of the metates are:

length 23" width 13" depth 4" and weight 55 pounds
length 24" width 15" depth 5" and weight 65 pounds

They will be placed on display when the University Library completes construction of the Arabian Horse/Archives/Special Collection Room sometime in the future.
http://www.cpp.edu/~library/specialcollections/history/spotlight.html

Sincerely,

Andrew Salas, Chairman
Gabrieleno Band of Mission Indians - Kizh Nation
PO Box 393
Covina, CA 91723
cell: (626)926-4131
email: gabrielenoindians@yahoo.com
website: www.gabrielenoindians.org

GABRIELENO BAND OF MISSION INDIANS - KIZH NATION
Historically known as The San Gabriel Band of Mission Indians
Recognized by the State of California as the aboriginal tribe of the Los Angeles basin

Dear Samantha Murray, MA, RPA
Archeologist
DUDEK

Subject Cultural Resources Study for the Corporate Yard Facility Project, City of Pomona California

*"The project locale In Pomona (**Sutkava)** lies in an area where the Ancestral & traditional territories of the Kizh(Kitc) Gabrieleño villages Such as **Tooypingn a& Wiininga** , adjoined and overlapped with each other, at least during the Late Prehistoric and Protohistoric Periods. The homeland of the Kizh (Kitc) Gabrieleños , probably the most influential Native American group in aboriginal southern California (Bean and Smith 1978a:538), was centered in the Los Angeles Basin, and reached as far east as the San Bernardino-Riverside area. The homeland of the Serranos was primarily the San Bernardino Mountains, including the slopes and lowlands on the north and south flanks. Whatever the linguistic affiliation, Native Americans in and around the project area exhibited similar organization and resource procurement strategies. Villages were based on clan or lineage groups. Their home/ base sites are marked by midden deposits, often with bedrock mortars. During their seasonal rounds to exploit plant resources, small groups would migrate within their traditional territory in search of specific plants and animals. Their gathering strategies often left behind signs of special use sites, usually grinding slicks on bedrock boulders, at the locations of the resources.* ***Therefore, in order to protect our resources we're requesting one of our experienced & certified Native American monitors as well as a Archeo- Monitorto be on site during any & all ground disturbances (this includes but is not limited to pavement removal, pot-holing or auguring, boring, grading, excavation and trenching)****.*

In all cases, when the NAHC states there are "No" records of sacred sites" in the subject area; they always refer the contractors back to the Native American Tribes whose tribal territory the project area is in. This is due to the fact, that the NAHC is only aware of general information on each California NA Tribe they are "NOT " the "experts" on our Tribe. Our Elder Committee & Tribal Historians are the experts and is the reason why the NAHC will always refer contractors to the local tribes.

In addition, we are also often told that an area has been previously developed or disturbed and thus there are no concerns for cultural resources and thus minimal impacts would be expected. I have two major recent examples of how similar statements on other projects were proven very inadequate. An archaeological study claimed there would be no impacts to an area adjacent to the Plaza Church at Olvera Street, the original Spanish settlement of Los Angeles, now in downtown Los Angeles. In fact, this site was the Gabrieleno village of Yangna long before it became what it is now today. The new development wrongfully began their construction and they, in the process, dug up and desecrated 118 burials. The area that was dismissed as culturally sensitive was in fact the First Cemetery of Los Angeles where it had been well documented at the Huntington Library that 400 of our Tribe's ancestors were buried there along with the founding families of Los Angeles (Pico's, Sepulveda's, and Alvarado's to name a few). In addition, there was another inappropriate study for the development of a new sports complex at Fedde Middle School in the City of Hawaiian Gardens could commence. Again, a village and burial site were desecrated despite their mitigation measures. Thankfully, we were able to work alongside the school district to quickly and respectfully mitigate a mutually beneficial resolution.

Given all the above, the proper thing to do for your project would be for our Tribe to monitor ground disturbing construction work. Native American monitors and/or consultant can see that cultural resources are treated appropriately from the Native American point of view. Because we are the lineal descendants of the vast area of Los Angeles and Orange Counties, we hold sacred the ability to protect what little of our culture remains. We thank you for taking seriously your role and responsibility in assisting us in preserving our culture.

With respect,

Please contact our office regarding this project to coordinate a Native American Monitor to be present. Thank You

PO Box 393 Covina, CA 91723 www.gabrielenoindians@yahoo.com gabrielenoindians@yahoo.com

Andrew Salas, Chairman
Cell (626) 926-4131

Addendum: clarification regarding some confusions regarding consultation under AB52:

AB52 clearly states that consultation must occur with tribes that claim traditional and cultural affiliation with a project site. Unfortunately, this statement has been left open to interpretation so much that neighboring tribes are claiming affiliation with projects well outside their traditional tribal territory. The territories of our surrounding Native American tribes such as the Luiseno, Chumash, and Cahuilla tribal entities. Each of our tribal territories has been well defined by historians, ethnographers, archaeologists, and ethnographers – a list of resources we can provide upon request. Often, each Tribe as well educates the public on their very own website as to the definition of their tribal boundaries. You may have received a consultation request from another Tribe. However we are responding because your project site lies within our Ancestral tribal territory, which, again, has been well documented. What does Ancestrally or Ancestral mean? The people who were in your family in past times, Of, belonging to, inherited from, or denoting an ancestor or ancestors http://www.thefreedictionary.com/ancestral. . If you have questions regarding the validity of the "traditional and cultural affiliation" of another Tribe, we urge you to contact the Native American Heritage Commission directly. Section 5 section 21080.3.1 (c) states "…the Native American Heritage Commission shall assist the lead agency in identifying the California Native American tribes that are traditionally and culturally affiliated with the project area." In addition, ***please see the map below.***

CC: NAHC

APPENDIX 1: Map 1-2; Bean and Smith 1978 map.

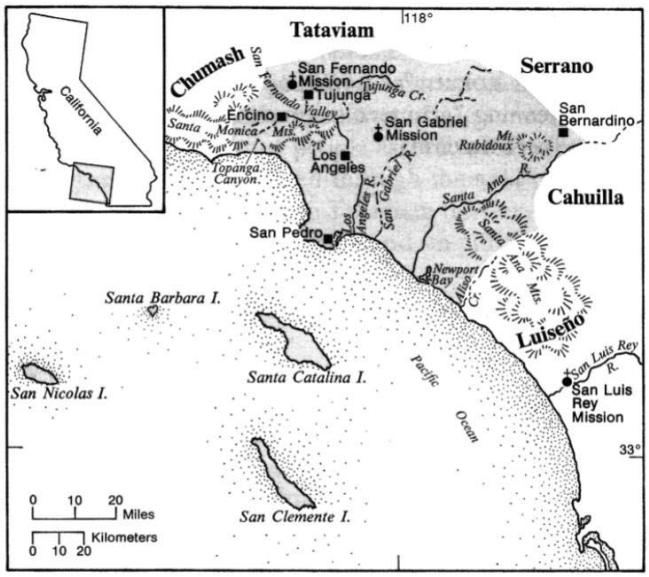


Fig. 1. Tribal territory.

The United States National Museum's Map of Gabrielino Territory:

Bean, Lowell John and Charles R. Smith
1978 Gabrielino IN *Handbook of North American Indians, California,* Vol. 8, edited by R.F. Heizer, Smithsonian Institution Press, Washington, D.C., pp. 538-549

APPENDIX C

DPR Forms

State of California — The Resources Agency
DEPARTMENT OF PARKS AND RECREATION

PRIMARY RECORD

Primary #
HRI #
Trinomial
NRHP Status Code 6Z

Other Listings
Review Code | Reviewer | Date

 ***Resource Name or #:** Pomona Gas Plant

P1. Other Identifier:

***P2. Location:** ☐ **Not for Publication** ■ **Unrestricted** ***a. County:** Los Angeles

and (P2b and P2c or P2d. Attach a Location Map as necessary.)

***b. USGS 7.5' Quad:** San Dimas **Date:** 1966 PR 1981 **T** 1S; **R** 8W ; NW ¼ **of** NW ¼ **of Sec** ; SB **B.M.**

c. Address: 148 N. Huntington Street City: Pomona Zip: 91769

d. UTM: Zone: 11S; 429772.00mE/ 3768967.00mN (G.P.S.) Google Earth

e. Other Locational Data: (e.g., parcel #, directions to resource, elevation, etc., as appropriate) Elevation:

APNs 8340-032-909, 8348-013-901, 8348-013-902, and 8348-013-903. Property is located at 148 North Huntington Street and is bound to the north by West Monterey Avenue and West Commercial Street, to the south by the Union Pacific Railroad (UPRR) tracks, to the west by North Hamilton Boulevard and North Huntington Street, and to the east by industrial uses fronting North White Avenue.

***P3a. Description:** (Describe resource and its major elements. Include design, materials, condition, alterations, size, setting, and boundaries)

The Pomona Gas Plant site is located at 148 N. Huntington Street on the southwest corner of Huntington Street and Commercial Street in the City of Pomona. The L-shape site is bounded by Commercial Street to the northwest and an alley to the northeast, the SPRR ROW to the south, Hamilton Boulevard to the west, and adjacent corporate yard buildings to the east. Of the nine buildings over 45 years, 8 buildings are associated with the former SCGC gas plant that existed on the project site between 1916 and 1954. Building 9 was constructed much more recently when the parcel 8348-013-901 came under City ownership (post-1965). Only one building within the project site (Building 6) was constructed when the site was owned by SCE (pre-1916) (**see Continuation Sheet**).

***P3b. Resource Attributes:** (List attributes and codes) HP8. Industrial Building, HP9. Public Utility Building, HP14. Government Building

***P4. Resources Present:** ■Building ■Structure ☐Object ■Site ☐District ☐Element of District ☐Other (Isolates, etc.)

P5a. Photo or Drawing (Photo required for buildings, structures, and objects.)

P5b. Description of Photo: (View, date, accession #) Overview of property, view to southeast, 9/7/16, IMG_5712

***P6. Date Constructed/Age and Sources:** ■Historic ☐Prehistoric ☐Both
1906-1946 (Sanborn maps)

***P7. Owner and Address:**
City of Pomona
505 S. Garey Avenue
Pomona, California 91766

***P8. Recorded by:** (Name, affiliation, and address)
Samantha Murray
Dudek
38 N Marengo Ave.
Pasadena, CA 91101

***P9. Date Recorded:** 9/25/2016

***P10. Survey Type:** Intensive

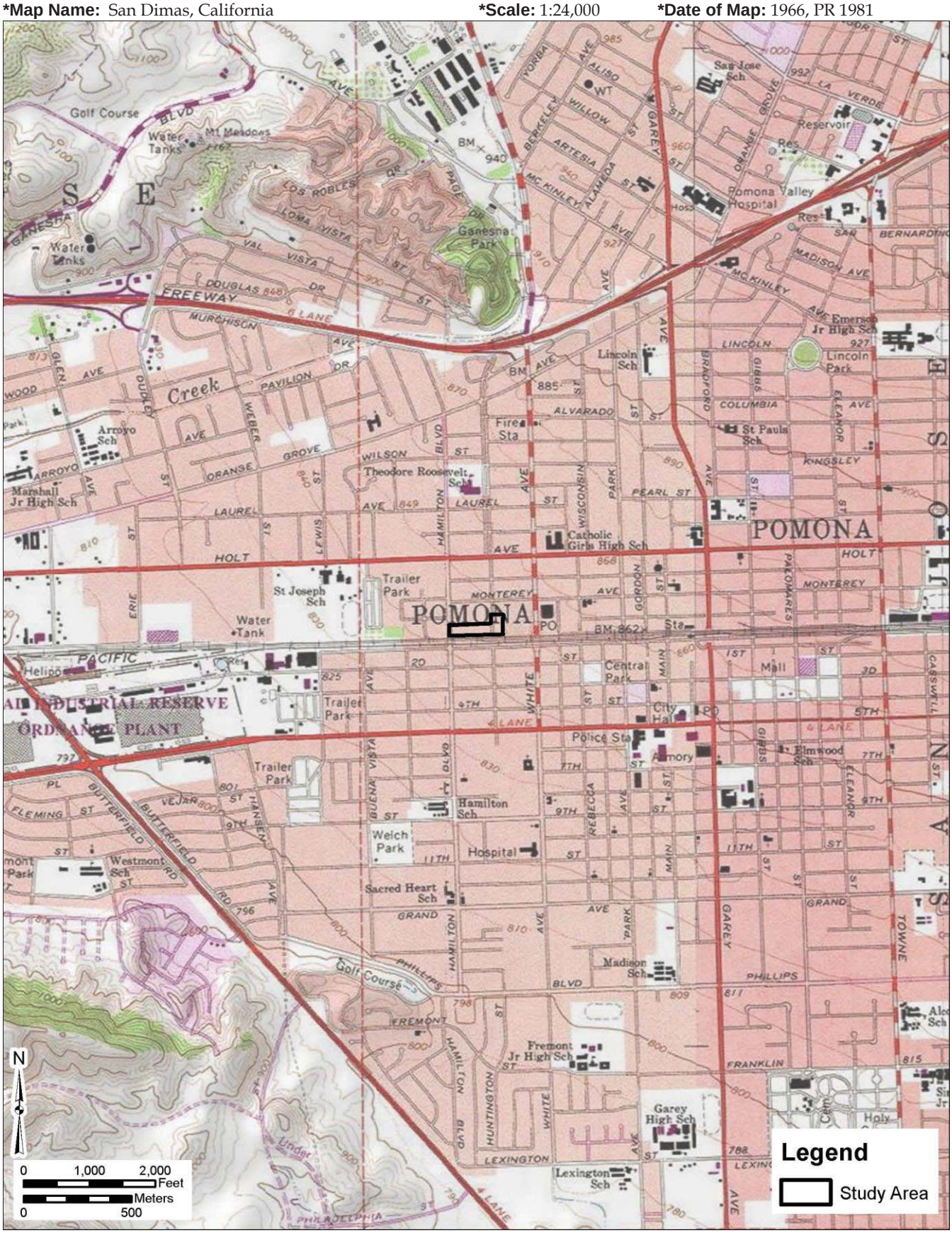
***P11. Report Citation:** (Cite survey report and other sources, or enter "none.") *Cultural Resources Study for 148 North Huntington Street, City of Pomona, Los Angeles County, California*. Dudek 2016.

***Attachments:** ☐NONE ■Location Map ☐Sketch Map ■Continuation Sheet ■Building, Structure, and Object Record ☐Archaeological Record ☐District Record ☐Linear Feature Record ☐Milling Station Record ☐Rock Art Record ☐Artifact Record ☐Photograph Record ☐ Other (List):

LOCATION MAP

 ***Resource Name or #:** Pomona Gas Plant

***Map Name:** San Dimas, California ***Scale:** 1:24,000 ***Date of Map:** 1966, PR 1981



 ***Required information**

B1. Historic Name: Pomona Gas and Electric Lighting Company Gas Works, Edison Electric Company Gas Works, SoCal Edison Company Gas Works, and Southern Counties Gas Company Plant.
B2. Common Name:
B3. Original Use: gas plant B4. Present Use: City corporate yard facility
***B5. Architectural Style:** industrial
***B6. Construction History:** (Construction date, alterations, and date of alterations) Constructed 1906-1946. See discussion of individual buildings for alterations.

***B7. Moved? ■No ☐Yes ☐Unknown Date: Original Location:**
***B8. Related Features:**
B9a. Architect: b. Builder:
***B10. Significance: Theme: Area:**
Period of Significance: Property Type: Applicable Criteria: n/a
(Discuss importance in terms of historical or architectural context as defined by theme, period, and geographic scope. Also address integrity.)

Pomona Gas Plant Site

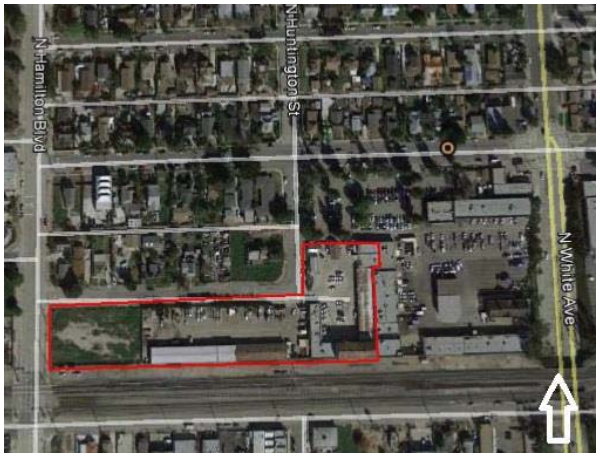
The Pomona Gas and Electric Light Company was incorporated in 1885 with a capital stock of $50,000 (Light, Heat, and Power 1885). The company manufactured gas from coal and coke, and set up a contract with Sims & Morris of San Francisco to service Pomona's 3,500 residents (Johnston 1887). The plant was located at the corner of Monrovia Avenue and Grace in the industrial district of Pomona, just north of the SPRR main track. Originally, the plant laid pipes for local distribution through the business part of town only. In 1902, the Pomona Gas and Electric Light Company and its plant was sold by owners J. Albert Dole and Arthur M. Dole to the Pomona and Ontario Light and Fuel Company. The new company would introduce a new process that involved using Lowe crude oil gas. A special apparatus used in production of the crude oil was constructed in San Francisco for the Pomona plant, and was said to reduce gas manufacturing costs. The company also made plans to extend the gas mains in Pomona and run new pipelines to Ontario and Upland (LAT 1902). In 1905, a half-million dollar deal was struck with the Edison Company, in which gas plants at Riverside, Pomona, and Whittier were transferred to Edison as part of its vast expansion of interests throughout Southern California (LAT 1905).

In 1906, SCE erected a new gas tank at its Pomona plant with a capacity of 50,000 cubic feet. The new tank and associated 4-miles of mains cost approximately $30,000 and required a crew of 60 men. In order to accommodate Pomona's rapid growth, a new 8-inch main was slated to be laid from the gas works on Holt Avenue to Eleanor Street (LAT 1906).

Excitement over the new improvements quickly faded, and by 1909, SCE went before the Board of Trade and stated that its Pomona gas plant was losing on profits, citing figures that showed the company expended more than $50,000 in improvements. According to SCE, this expense, in combination with the current rate of gas ($1.15 per one thousand cubic feet), left no money to be made. SCE requested that the gas rate be increased to $1.35 and promised to invest more than $60,000 in additional improvements if the increase was approved (LAT 1909) (**see Continuation Sheet**).

B11. Additional Resource Attributes: (List attributes and codes)
***B12. References:** See Continuation Sheet
B13. Remarks:
***B14. Evaluator:** Samantha Murray
***Date of Evaluation:** 9/25/16

(Sketch Map with north arrow required.)



(This space reserved for official comments.)

P3a Description (Continued):

Nine buildings/structures over 45 years of age were identified within the project area as a result of the pedestrian survey. The following paragraphs provide a physical description of each building within the project site that was recorded and evaluated for historical significance as part of the former Pomona Gas Plant site. Other studies have referred to the site historically as the Pomona Manufactured Gas Plant site, however, natural gas replaced manufactured gas in 1917. Further, because buildings within the project site are associated with both SCE and SCGC ownership, a specific utility company name has not been used to identify the site. Therefore, the site has been recorded as the Pomona Gas Plant site.

Building 1 is located in the northwestern most corner of the site on AIN 8340-032-909. Historic aerial photographs and Sanborn maps indicate the building was constructed between 1943 and 1946. This prefabricated metal storage building is rectangular in-plan with a side gable roof clad in metal flashing with a metal vent, and measures approximately 640 sf. The building is accessed via a horizontal sliding metal door on the south elevation. A single, four pane window with wooden muntins is also located on the south elevation, and two more of the same type are partially visible on the north elevation. The building appears to function as miscellaneous storage.

Building 2 is located in the north central portion of the site on AIN 8340-032-909. Sanborn maps indicate that the building was constructed between 1928 and 1943. The building is rectangular in-plan with a front gable roof sheathed in corrugated metal panels. The gable is also filled with painted corrugated metal. The rear half of the building is an enclosed concrete masonry structure with a stucco clad exterior. Windows consist of wood-frame, single-hung and awning openings. The roof continues over the front half of the building which functions as a carport/vehicle bay with an air pressure hose for filling tires. This area also provides storage for construction barricades. The roof is supported on the south elevation by two metal posts. Permit records indicated that a gas dispenser island, oil dispensers, and associated underground unleaded gas tank and diesel tank were removed from and below the building in 1999. An adjacent chemical shed was also removed from the west elevation (Permit No. FP-99-010). Other observed alterations include replacement of the original posts that support the front (south) elevation of the roof structure with painted metal posts. It is assumed that the original posts were wood.

Building 3 is located in the northeastern corner of the site on AIN 8340-032-909. Sanborn maps indicate that the building was constructed between 1928 and 1943. The building is rectangular in-plan, with a flat roof structure, and painted concrete block walls. The front (west) elevation has a large industrial garage door with tilt opening. The north elevation contains four multi-pane windows with awning openings. The east and south elevations abut adjacent buildings. The building currently functions as the City Water Department's welding shop and historically functioned as an auto repair bay.

Building 4 is located in the northeastern portion of the site on AIN 8340-032-909 adjacent to Building 3 on the north elevation, and Building 5 on the south elevation. Sanborn maps indicate that the building was constructed between 1928 and 1943. The building is mostly prefabricated metal construction with a painted brick wall on the south elevation, and the adjacent building supporting the north elevation. The front (west) elevation contains two industrial garage tilt doors divided by a corrugated metal panel with a standard door opening. A sign on the front elevation reads "Fabrication and Carpenter Shop." This building is currently functioning as the City Water Department's Dynamometer Shop.

Building 5 is located in the eastern portion of the site on AIN 8340-032-909, adjacent to Building 4 on the north elevation, and Building 6 on the south elevation. Sanborn maps indicate that the structure was constructed between 1911 and 1928. It is assumed that this structure was constructed in 1922 when SCGC proposed numerous improvements to the site which included a new garage, meter shop, store room, and several small structures. The structure is approximately 180 feet long with a side gable, corrugated metal roof supported by metal posts set in raised concrete footings. The posts are spaced to create nine vehicle bays. The two northernmost bays have been covered with metal gates to provide storage for equipment. The rear (east) elevation is comprised of the adjacent building to the east. The structure appears to have always functioned as vehicle storage.

Building 6 is located in the southeastern corner of the site on AIN 8340-032-909, adjacent to Building 5 on the north elevation, and Building 7 on the west elevation. Sanborn maps indicate that it was built between 1906 and 1911, making it the oldest building on the property. Building 6 is two-stories, rectangular in-plan, with a steel frame, concrete slab foundation, and roof and exterior walls sheathed in corrugated metal panels. The building is approximately 7,600 sf. The front (north) elevation faces into the corporate yard. The ground level features a centrally located industrial metal roll-up door with a wooden loading dock, a horizontal sliding wood door, and a standard entry door with awning and a sign that reads "Storeroom." A larger sign on the center of building reads "Central Receiving." The second story of the north elevation features two small multi-pane windows and a single entry door atop a set of wooden stairs with a simple landing with railing. The south elevation faces the SPRR ROW and features four multi-pane windows with awning openings on the first story. The building is currently used for storage and also has a small classroom space for training purposes. Sanborn maps indicate that they building was originally constructed as part of the SCE Gas Company's Gas Works plant. Observed alterations include the addition of a new entry door, the addition of a new wooden loading dock; new painted metal pipe railings that attached to the exterior of the north elevation; and the addition of a steel lattice tower set in a concrete foundation on the north elevation. Documented alterations include the enclosure od a 23′ x 10′ room for records storage on the second level in 1947 (Permit No. 17367); and the construction of a 20′ x 30′ classroom with three new windows on the second level in 1948 (Permit No. 18879).

Building 7 is located in the eastern portion of the site on AIN 8340-032-909, adjacent to Building 6 on its southeast elevation. Sanborn maps indicate that it was built between 1911 and 1928. It is assumed that this building was constructed in 1922 when SCGC proposed numerous improvements to the site which included a new garage, meter shop, store room, and several small structures. The building is single-story, L-shape in-plan, constructed of brick masonry, and contains approximately 3,950 sf. The north (front) elevation contains two steel sash multi-pane windows with central awning openings, with signage above that reads "Water Dept – City of Pomona." The building is accessed via the east elevation, which contains several entrances accessed via a covered concrete walkway with a wooden canopy sheathed in corrugated metal panels and supported by metal posts. All original doors have been replaced. There are windows of various types and age, including original steel sash multi-pane, and replaced steel sash horizontal sliders. The southeast tail of the building connects to the adjacent warehouse (Building 6). This portion of the building contains a horizontal sliding wooden door set atop a wooden loading dock that does not appear to be original to the property. The west elevation also contains windows of various types and age. Many of the original windows have been removed as evidenced by re-brick patches throughout. Bracketed metal awnings have been added above two windows. Both the east and west elevations reveal numerous brick patches where windows and doors were originally located. The north elevation faces the SPRR ROW and reveals additional brick patches and an industrial wooden door.

The building was originally constructed as a Meter Shop (c. 1922) that included warehouse and office space for the SCGC plant. The building is currently used for office, restroom, and storage space by the City of Pomona Water/Wastewater Operations Department, and has been since the mid-1950s. Many of the major alterations to the building can be attributed to a 1951 remodel of the Meter Shop commissioned by SCGC and completed by Strona Bros. Alterations to the building associated with this remodel include the following (as indicated on the 1951 remodel plans provided by the City archives):

- Removal of an original window and installation of new glazed door with vented steel sash transom in its place on the east elevation
- Removal of original loading dock, ramps, and sliding doors on the east elevation. Then installation of the window removed in the first bullet point, and installation of a new glazed door with vented transom in the existing opening.
- Removal of a pair of sliding doors from the west elevation; installation of Truscon steel sash in their place; and re-bricking of openings on west elevation.
- Removal of an original steel sash window and replacement with a vented Truscon steel sash; and re-bricking of openings on the west elevation.
- Addition of a 100-foot-long concrete walkway and canopy with metal flashing along the east elevation.

Building 8 is located in the western portion of the site on AIN 8348-013-901, adjacent to Building 9 on its west elevation. Sanborn maps indicate that it was built between 1928 and 1943. The building is a prefabricated industrial metal building measuring approximately 5,120 sf. The building is single-story, rectangular in-plan, and measures approximately 120-feet-long. The building's roof and exterior walls are sheathed in corrugated metal siding. Four horizontal sliding metal doors are located on the north elevation. The east elevation is largely obscured by two small modern sheds. Below the gable is a row of industrial metal sash, multi-pane windows with awning openings. The south elevation faces the SPRR ROW and has been painted over numerous times to cover graffiti. Other than the paint, the exterior of the building appears largely unaltered. The building was originally constructed to provide supply storage as part of the SCGC plant, and continues to serve as storage for the City Water/Wastewater Department.

Building 9 is located in the western portion of the site on AIN 8348-013-901, adjacent to Building 8 on its east elevation. Historic aerial photographs indicate that it was built between 1966 and 1972. The building measures approximately 8,360 sf and consists of two conjoined prefabricated industrial metal structures, single-story, rectangular in-plan, and measuring approximately 200-feet in total length. The structure contains 9 vehicle storage bays for City maintenance vehicles spaced by metal post and beam supports. The structure contains no windows or doors. The south elevation faces the SPRR ROW and has been painted over numerous times to cover graffiti. The structure is in poor condition overall with numerous holes observed on the west elevation and a bent roofline.

B10. Significance (Continued):

The SCGC was organized in 1911 to take over the gas department of the Edison Company. In 1916, after several years of negotiations, several of SCE's properties were purchased by the SCGC for approximately $4 million. The properties included plants in Venice, Santa Monica, Sawtelle, Pomona, Chino, Claremont, Lordsburg, San Dimas, Wilmington, Long Beach, and Seal Beach (LAH 1916). That same year, the company began construction and installation of their Pomona plant. (Historic Record Company 1920).

By 1917, manufactured gas operations ended at the Pomona plant with the development of a 14-mile main between the oil fields in Brea Canon and Pomona, which provided Pomona and surrounding cities like Ontario and Upland with natural gas (LAH 1917). The following year, SCGC made a plea to the State Railroad Commissioners for an increase in gas rates in order to offset the company's increased labor costs associated with the expense of distributing natural gas (LAH 1918). In 1921, the commission approved a rate increase on industrial users of natural gas of 5 cents, a decision that would affect the Eastern District, including Pomona, Whittier, and Monrovia.

In 1919, the Pomona branch of the SCGC was enlarged to include the Ontario-Upland district. It was also announced that the company would extend its mains to the city of Chino, giving the City two main lines of gas supply. The new line would be approximately 3 miles of pipe (American Gas Engineering Journal 1919).

In 1922, it was announced that the SCGC was dismantling its old Pomona plant and replacing it with new buildings, modern machinery, and other new equipment that was expected to be in place by the fall. The rapid expansion of business in the Pomona District rendered the existing plant inadequate. The proposed improvements included construction of a new garage, meter shop, store room, and several small structures. District Superintendent B.G. Steinruck also announced later that month that the company planned to install approximately 7,000 feet of an 8-inch gas main from the Pomona plant through the entire Pomona industrial district in order to increase the gas supply to that section of the city and in anticipation of future growth. The line would also meet the larger gas demands of the eastern portion of the district, including cities like Chino, Ontario, and Upland (Gas Age-Record 1922).

In 1927, it was announced that high pressure storage holders capable of storing up to 1 million cubic feet of natural gas would be erected at the Pomona, Anaheim, and San Pedro plants for a cost of $125,000 for each site (LAT 1927). In 1928 an additional $35,000 was allotted to the Pomona plant to complete construction of the new gas holder (LAT 1928).

In 1954, SCGC reported that it would spend $533,000 on a new Pomona operating base to service its rapidly growing Eastern Division which added more than 9,400 customers within the last year. The new facility would be located on an 8-acre site at 1540 W. 2nd Street and would replace the current operating base at 148 N. Huntington Avenue. It was further reported that SCGC would dispose of most of its existing base but would retain a 2-acre area for use as a salvage yard (LAT 1954). The new facility officially opened in July 1955.

In 1955, the former gas plant site was sold to the City of Pomona who developed the site for use as its water department operations and maintenance yard. In 1965, the City Water Department would receive two additional parcels from SCGC (LAT 1962), expanding its current corporate yard facility. Table 3 provides a record of the project site's ownership and sale history.

*Recorded by: Samantha Murray *Date: 9/25/16 ■ Continuation ☐ Update

CRHR Evaluation

CRHR Criterion 1: Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.

The Pomona Gas Plant site operated as a manufactured gas plant from 1885 to 1917, and as a natural gas plant from 1917 until 1954 when operations were moved to a new location on Second Street and the City of Pomona acquired the property. The Pomona Gas Plant site saw an evolution of gas technology, beginning with the production of manufactured gas from coal and coke (a process that began in the eastern United States in the early 19th century); transitioning to the Lowe crude oil water gas manufacturing process in 1902; and eventually tapping directly into local natural gas oil fields by 1917. Over the years, the Pomona Gas Plant was owned and operated by various individuals and utility companies; and the site was known by various names. The most significant owners in the plant's history include The Pomona Gas and Electric Lighting Company (1887-1906), Edison Electric Company/Southern California Edison Company (1906-1916), and Southern Counties Gas Company (1916-1955). In 1955, the site was acquired by the City of Pomona and has been utilized as a corporate yard facility for the Water/Wastewater Department ever since.

Changes in gas technology and ownership of the property over the years has resulted in removal of all of the original equipment and buildings associated with the coal and coke manufacturing process, and only one building on the site dates back to the period when the site was owned by SCE (Building 6). Seven buildings on the site (Buildings 1-5, 7, and 8) date back to the period when the site was owned and operated by SCGC, after the transition from manufactured to natural gas. One structure on the site (Building 9) post-dates the gas plant history and was constructed for use by the City in the 1960s.

None of the buildings/structures on the site are associated with the original gas manufacturing process of the late 19th and early 20th centuries, which utilized coal and coke energy resources. The original buildings on the site were likely removed between 1902 and 1906 when the plant began the Lowe crude oil manufacturing process and when Edison took over the property in 1906. The 1906 Sanborn map indicates that the site is "being remodeled." The two-story metal warehouse building (Building 6) appears on 1911 Sanborn maps (indicating that it was constructed between 1906 and 1911), representing the earliest of the existing buildings within the project site. The next buildings to be constructed were Buildings 5 and 7 (c. 1922). It is assumed that these buildings were constructed in 1922 when SCGC announced its plans to dismantle most of the old equipment on the site and replace it with new buildings and modern machinery including a new garage, meter shop, store room, and several small structures. A small SPRR spur was also constructed by 1928 to provide direct rail access to the plant (no longer extant). The remainder of the buildings and structures appear to have been constructed/moved to the site post-1928 as part of on-going modifications/upgrades to the gas plant site, likely occurring after the plant received its new high pressure storage holders (1927-1928).

While the Pomona Gas Plant site represents an important piece of the City's industrial history, introducing a critically important utility to the City, and providing both manufactured and natural gas to both residents and industrial businesses from 1895 to 1954, the site itself does not convey the important associations with the beginnings of manufactured gas production in the Pomona Valley. Not surprisingly, the Pomona Gas Plant site was constantly evolving to keep up with changes in technology and to meet the needs of a rapidly growing population. While buildings and structures on the site today have been in place for 70-100 years, many suffer from a lack of integrity. Further, nearly all of the equipment associated with manufactured and natural gas procurement have been removed (including the rail spurs), significantly impairing the site's ability to convey its gas plant history. No important historical associations were identified with the site's more recent history as the City Water Department's corporate yard facility (post-1955). Therefore, the Pomona Gas Plant site does not appear eligible under CRHR Criterion 1 for its associations with events.

CRHR Criterion 2: Is associated with the lives of persons important in our past.

While numerous persons are historically associated with the Pomona gas plant site, archival and background research failed to indicate any associations with persons important in history. Therefore, the site does not appear eligible under CRHR Criterion 2.

CRHR Criterion 3: Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values.

The buildings and structures within the Pomona Gas Plant are industrial/utilitarian style buildings with little to no ornamentation. Buildings materials are simple (i.e., metal, brick, or concrete block), and many are prefabricated. Buildings 1, 3, 4, 5, 6, 8, and 9 are ubiquitous, industrial buildings/structures that lack any distinctive styling or features to warrant consideration for architectural significance. Building 2 functions as the shower/locker room and appears to contain most of its original windows and doors. However, this building has been subject to significant alterations including removal of the original gas tank island, replacement of its main supporting posts, and loss of other equipment associated with its former gas plant functions. Building 7 appears to be the only building on the site that was architecturally designed (although the original architect was not identified) and exhibits some character-defining features of a 1920s industrial office/warehouse building. This building was constructed as the Meter Shop for SCGC c. 1922 when the site was modernized and most of the older buildings were removed. However, this building has been subject to numerous alterations that have significantly compromised much of its original design, style, materials, and workmanship. The building reveals numerous brick patches (re-bricking) where most of the original windows and doors were removed and replaced, and many of these replacements are incompatible with the original design and date of construction. Only the front (north) elevation appears to remain intact. The modifications are further confirmed by remodel plans from 1951 which also indicate that the original loading dock/ramp/doors were entirely removed from the east elevation and that a new concrete walkway and canopy was added. The extent of alterations identified indicate that Building 7 does not retain requisite integrity under this criterion.

While the buildings within the Pomona Gas Plant site still convey their industrial feeling, many are in poor condition and lack distinctive characteristics that would warrant further consideration under this criterion. Building 7 has been heavily altered such that important character-defining features have been impaired. Therefore, the buildings and structures that comprise the Pomona Gas Plant site do not appear eligible CRHR Criterion 3 for architectural merit. Further, none of the buildings appear to warrant individual consideration.

CRHR Criterion 4: Has yielded, or may be likely to yield, information important in prehistory or history.

The buildings and structures on site are unlikely to yield any information important to prehistory or history, nor are they associated with any archaeological resources. Therefore, the Pomona Gas Plant site does not appear eligible for listing under CRHR Criterion 4.

City of Pomona Evaluation

1. It exemplifies or reflects special elements of the city of Pomona's cultural, social, economic, political, aesthetic, engineering, architectural, or natural history;

While the buildings and structures within the Pomona Gas Plant site convey a general sense of the City's history of industrial development based on their industrial/utilitarian architecture and their historic relationship to the adjacent SPRR tracks, they do not reflect "special elements" of the City's industrial history. The Pomona Gas Plant site has undergone significant modifications over the years, including removal of all of the original gas plant equipment. For this reason, the site no longer speaks to the City's early development of utilities/energy resources. Therefore, the site does not appear eligible under City Criterion 1.

2. It is identified with persons or events significant in local, state, or national history;

As discussed above under CRHR Criterion 2, archival and background research failed to indicate any associations with persons important in history. As discussed above under CRHR Criterion 1, the Pomona Gas Plant site does not convey the important associations with the beginnings of manufactured gas production in the Pomona Valley. Not surprisingly, the Pomona Gas Plant site was constantly evolving to keep up with changes in technology and to meet the needs of a rapidly growing population. While buildings and structures on the site today have been in place for 70-100 years, many suffer from a lack of integrity. Further, nearly all of the equipment associated with manufactured and natural gas procurement have been removed (including the rail spurs), significantly impairing the site's ability to convey its gas plant history. No important historical associations with events were identified with the site's more recent history as the City Water Department's corporate yard facility (post-1955). Therefore, the site does not appear eligible under City Criterion 2.

3. It embodies distinctive characteristics of a style, type, period, or method of construction, or is a valuable example of the use of indigenous materials or craftsmanship;

As discussed above under CRHR Criterion 3, the buildings and structures within the Pomona Gas Plant site are industrial/utilitarian style buildings with little to no ornamentation. Buildings materials are simple (i.e., metal, brick, or concrete block), and many are prefabricated. While the buildings within the Pomona Gas Plant site still convey their industrial feeling, many are in poor condition and lack distinctive characteristics that would warrant further consideration under this criterion. Further, the lack of associated gas plant equipment on the site hinders their ability to convey significant associations with the gas plant. Building 7 is the only designed building on the site, and it has been heavily altered such that important character-defining features have been impaired. Therefore, the buildings and structures that comprise the Pomona Gas Plant site do not appear eligible under City Criterion 3 for architectural merit.

4. It contributes to the significance of an historic area, being a geographically definable area possessing a concentration of historic or scenic properties or thematically related grouping of properties which contribute to each other and are unified aesthetically by plan or physical development;

The Pomona Gas Plant site is not part of an identified historic district, nor does it constitute an historic district in its own right. Therefore, the site does not appear eligible under City Criterion 4.

5. It is the work of a notable builder, designer, landscape designer or architect;

Archival and building development research failed to reveal the names of any specific builders, designers, or architects associated with the buildings on the site. Therefore, the site does not appear eligible under City Criterion 5.

6. It has a unique location or singular physical characteristics or is a view or vista representing an established and familiar visual feature of a neighborhood, community, or the city of Pomona;

The Pomona Gas Plant site does not have a unique location, nor does it offer a view or vista that is an established feature of the community. The site is located in an area of mixed residential and industrial development and is not located in an area that is easily seen by the community. The site is located behind walls/gates and does not offer itself for public viewing. While the southern boundary of the site is visible from the SPRR ROW, the southern elevation of the buildings is not particularly unique and is partially obscured by paint and graffiti. Therefore, the site does not appear eligible under City Criterion 6.

7. It embodies elements of architectural design, detail, materials, or craftsmanship that represent a significant structural or architectural achievement or innovation;

Nearly all of the buildings within the Pomona Gas Plant are prefabricated, industrial buildings. They are a ubiquitous resource type and do not embody elements of architectural design, detail, materials, or craftsmanship. The only building that could qualify under this criterion is Building 7, which appears to be the only designed building on the property. However, Building 7 has been substantially altered and no longer retains integrity of its original design, as evidenced by extensive re-bricking throughout, where original windows and doors were replaced, removal of the original loading dock/ramp/doors, and the addition of a concrete walkway and canopy structure. Therefore, the site does not appear eligible under City Criterion 7.

8. It is similar to other distinctive properties, sites, areas, or objects based on an historic, cultural, or architectural motif;

The site is not known to be similar to other distinctive properties based on any historic, cultural, or architectural motif. Therefore, the site does not appear eligible under City Criterion 8.

9. It reflects significant geographical patterns, including those associated with different eras of settlement and growth, particular transportation modes, or distinctive examples of park or community planning;

The Pomona Gas Plant site does not reflect significant geographical patterns associated with the City's industrial development and growth. Numerous industrial properties including citrus packing houses, manufacturing companies, and mills were established along the SPRR in Pomona during late 19th and early 20th centuries. While the Pomona Gas Plant site appears to be one of the earlier industrial properties to have appeared along railroad in that portion of the City, it is no longer recognizable to that era, and does not convey the history of industrial development that peaked during the early- to mid-part of the 20th century. A good example of this is the Edison Historic District located a few blocks to the southeast on the 500 and 600 blocks of Second Street. Therefore, the site does not appear eligible under City Criterion 9.

10. It is one of the few remaining examples in the city of Pomona, region, state, or nation possessing distinguishing characteristics of an architectural or historical type or specimen.

The Pomona Gas Plant site is not a rare or significant example of a gas plant site. SCE and SCGC erected plants all over Southern California during the late 19th and early 20th centuries. Further, the plant in Pomona is not a particularly good example, as all of the associated plant equipment has been removed, thereby eliminating important connections to this site's former function. Further, as previously discussed, the site does not possess distinguishing architectural characteristics. Therefore, the site does not appear eligible under City Criterion 10.

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Buildings over 45 years
1 - Storage shed
2 - Locker room, restroom, showers
3 - Welding shop
4 - Dynamometer shop
5 - Vehicle storage
6 - Central store warehouse
7 - Offices and storage
8 - Annex storage
9 - Vehicle storage
Parcel Lines
Project Boundary
W Monterey Ave
W Commercial St
N Hamilton Blvd
8340032909
8348013903
8348013901
8348013902
0 50 100 Feet
SOURCE: Bing Maps, 2016
DUDEK
FIGURE 2
Corporate Yard Buildings Recorded and Evaluated
Pomona Corporate Yard Poject

APPENDIX D
NOISE ORDINANCE SUMMARY

Appendix D

Pomona Community Noise Exposure

(Pomona General Plan)