

APPROVED
JUN 05 2013

REPORT OF GENERAL MANAGER

NO. 13-155

DATE June 5, 2013

**BOARD OF RECREATION
& PARK COMMISSIONERS**

C.D. 12

BOARD OF RECREATION AND PARK COMMISSIONERS

SUBJECT: CHATSWORTH PARK SOUTH – LEAD CONTAMINATION CLEAN UP –
APPROVAL OF REMEDIAL ACTION PLAN AND MITIGATED NEGATIVE
DECLARATION

R. Adams _____
H. Fujita _____
V. Israel _____

K. Regan _____
*M. Shull UD for
N. Williams _____


General Manager

Approved _____

Disapproved _____

Withdrawn _____

RECOMMENDATIONS:

That the Board:

1. Review, consider and adopt the Initial Study/Mitigated Negative Declaration (IS/MND) for Chatsworth Park South Remedial Action Plan, finding that on the basis of the whole record of proceedings in the project, including the Draft IS/MND and all comments received, on file in the Board Office and in custody of the Department of Recreation and Parks (RAP) Superintendent of Planning, Construction and Maintenance Branch located at 221 North Figueroa Street, Suite 100, Los Angeles, California, that there is no substantial evidence that the project will have a significant effect on the environment or effects have been mitigated to a level less than significant, that all potentially significant environmental effects of the project have been properly disclosed and evaluated in the IS/MND in compliance with the California Environmental Quality Act (CEQA) and the State and City CEQA Guidelines, and reflects the Department of Recreation and Parks' independent judgment and analysis;
2. Review, consider and adopt the Mitigation Monitoring and Reporting Plan (MMRP) in Appendix F of the IS/MND that specifies the mitigation measures to be implemented in accordance with CEQA Guidelines (Section 15074(d));
3. Approve the Preferred Alternative (Alternative 3) of the Chatsworth Park South Remedial Action Plan, substantially in form on file in the Board Office, subject to the final approval by the California Environmental Protection Agency's Department of Toxic

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Substances Control in accordance with the Voluntary Cleanup Agreement (VCA), which is also on file in the Board Office; and,

4. Direct Staff to file a Notice of Determination (NOD) for the adopted IS/MND with the Los Angeles City Clerk and the Los Angeles County Clerk within five (5) days of the Board's approval.

SUMMARY:

Background:

On February 14, 2008, Chatsworth Park South was closed to the public due to the suspected lead and other contaminants from a skeet and trap firing range on the park property prior to acquisition by RAP in 1966. The contamination was subsequently substantiated by a required Preliminary Endangerment Assessment (PEA) performed by RAP under a VCA with the local office of the California Department of Toxic Substances Control (DTSC).

Preliminary Endangerment Assessment:

The primary hazard identified was human and/or animal contact with visible lead shot observed in the central portion of the park and trail area. A secondary hazard associated with the lead pellets was the release of soluble lead compounds into the environment. Visible accumulations of lead shot were ubiquitous in the bedrock outcroppings in the central portion of the park. The lead shot also accumulated in areas of water transport and segregation during high rainfall runoff events.

Visual mapping and subsurface analysis of individual soil samples also revealed that debris from clay targets (pigeons) used at the former shooting range was widespread across most of the level areas of the park due to vertical mixing from the removal and re-compaction of the soil during construction of the recreation building and surface improvements, and excavation and trenching during the installation of subsurface utilities, including the abandoned oil pipeline and 96-inch West Valley feeder line that extends directly across the former firing range. The PEA determined that the clay pigeons contributed Polycyclic Aromatic Hydrocarbon (PAH) contaminants to the soil. Surface and groundwater sampling and analysis determined that there were no significant impacts from contaminants associated with the firing range.

A Human Health Risk Assessment was prepared as part of the PEA. The assessment identified potential neurological and cancer-causing health risks to park workers and visitors from exposure to both lead and PAHs due to ingestion, inhalation and skin contact. Contaminates of concern included lead and antimony (constituents of the lead shot), and benzo(a)pyrene equivalents and naphthalene (PAH constituents of the clay pigeon debris).

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A biological survey and Ecological Risk Assessment were also prepared as part of the PEA. A Phase I predictive assessment for ecological risk identified risk to birds, mammals and invertebrates in the areas of the park with known contamination, including two (2) sensitive species (Western Mastiff Bat and the San Fernando Spine Flower).

These results and conclusions were approved by DTSC in the final Supplemental Site Investigation and PEA on January 10, 2011.

Remedial Action Plan:

Based on the results of the PEA, RAP prepared a Remedial Action Plan for submittal to DTSC that established cleanup goals, and evaluated various remediation methods. The two (2) main remedial action alternatives considered were: the removal, disposal and replacement of the contaminated soil, and capping of contaminated soil in place with an engineered cap. The capping alternative was designated as the preferred alternative for the most cost effective method of cleanup. The Remedial Action Plan contains preliminary civil engineering drawings that provide grading specifications, drainage control procedures, and storm water pollution prevention measures. A Health and Safety Plan to address worker and public safety during implementation was included in the Remedial Action Plan.

The Draft Remedial Action Plan was released for public comments as required under the VCA on March 21, 2013. The Final Remedial Action Plan will address and respond to the public comments that were received during public comment period before it is approved by DTSC. Once the Final Remedial Action Plan is approved, complete engineering drawings will be used to award a contract to implement the remedial action.

The cost to implement the alternative remedial actions based on preliminary engineering was included in the Draft Remedial Action Plan for evaluation of the cost effectiveness. The Preferred Alternative (Capping) was estimated to cost \$7,225,000.00 in comparison to the Excavation, Onsite Treatment, and Offsite Disposal Alternative at \$15,240,000.00. However, the Preferred Alternative also carries with it an annual maintenance cost of \$10,000.00.

Environmental Review:

In accordance with the California Environmental Quality Act (CEQA), the implementation of the Preferred Alternative of the Remedial Action Plan was evaluated for potentially significant impacts on the environment. An Initial Study (IS) determined that a Mitigated Negative Declaration (MND) could be prepared because all potentially significant environmental effects could be mitigated to a level less than significant.

The MND was circulated to all interested parties and responsible agencies, and filed with the State Clearinghouse for a thirty (30) -day review and comment period from March 21, 2013 to

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April 22, 2013 in conjunction with the Remedial Action Plan. Substantive comments were received from both the California Department of Fish and Wildlife and the South Coast Air Quality Management District, along with three (3) letters from interested individuals. The comments focused primarily on impacts to sensitive species and habitat in the remediation areas, impacts to air quality from construction dust, and potential impacts to cultural resources, water quality and stormwater runoff. Analysis of these comments determined that the impacts identified will be mitigated to a level less than significance, and the annotated responses are contained in Appendix E of the Final MND.

A Mitigation Monitoring and Reporting Program (MMRP) has been prepared that specifies all the mitigation measures identified in the MND, which will either reduce or eliminate the potentially significant environment impact of the project, in accordance with Section 15097 of the State CEQA Guidelines. The MMRP is contained in Appendix F of the Final MND.

FISCAL IMPACT STATEMENT:

The estimated cost of implementing the Preferred Alternative of \$7,225,000.00 may have a direct impact to RAP's budget. Currently, \$1,000,000.00 is earmarked for Lead Remediation – Chatsworth Park South in the Capital Improvement Expenditure Program (CIEP) as Department 54, Fund 100, and Account F757 for Fiscal Year 2013-2014. Additional funds are proposed in future fiscal years from CIEP, including the yet to be determined engineering and contract requirements to complete the implementation of the preferred remedial action. The estimated annual maintenance cost of \$10,000.00; however, would be submitted for funding in the RAP's future budget requests.

This Report was prepared by Paul Davis, Environmental Specialist and Project Manager and reviewed by Cathie Santo Domingo, Superintendent, Planning, Construction and Maintenance Branch.

Mitigated Negative Declaration: <http://www.laparks.org/environmental/chatsworth.htm>
Remedial Action Plan: <http://www.laparks.org/environmental/chatsworthRemedial.htm>