

BOARD RE	PORT	NO	25-166
DATE	October 02,2025	C.D	12
BOARD OF	RECREATION AND PARK COMMISSIONERS		
SUBJECT:	CHATSWORTH PARK SOUTH - OUTDOOR (PRJ21885) PROJECT - COMMITMENT OF PARK EXEMPT FROM THE PROVISIONS OF THE CALIL QUALITY ACT (CEQA) PURSUANT TO ARTICL [RESTORATION OR REHABILITATION OF DETE STRUCTURES, FACILITIES, OR MECHANICAL CURRENT STANDARDS OF PUBLIC HEALTH AN 15330 [MINOR CLEANUP ACTIONS TAKEN STABILIZE, MITIGATE, OR ELIMINATE THE RIRELEASE OF A HAZARDOUS WASTE OR SUBSTOR MEDIUM REMOVAL ACTIONS COSTING \$ CALIFORNIA CEQA GUIDELINES	FEES – CA FORNIA EN' E 19, SEC RIORATED EQUIPME D SAFETY] TO PREVEI ELEASE OF TANCE WHIC 1 MILLION	TEGORICALLY VIRONMENTAL TION 15301(d OR DAMAGED NT TO MEET AND SECTION NT, MINIMIZE R THREAT OF CH ARE SMALL OR LESS] OF
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#### RECOMMENDATIONS

Approved X

1. Approve the scope of work and the total budget of the Chatsworth Park South – Outdoor Park Improvements (PRJ21885) Project (Project), as described in the Summary of this Report;

Disapproved \_\_\_\_\_

Withdrawn

- 2. Authorize Department of Recreation and Parks (RAP) staff to commit from the fund and work order numbers listed in Attachment 1, a maximum of \$704,429.62 in Park Fees for proposed Project;
- 3. Approve the Project to be bid and constructed through RAP's list of pre-qualified on-call contractors;
- 4. Approve the authorization of change orders as authorized under Board Report No. 06-136, for the construction contracts for this Project in the budget contingency amounts for such contracts as stated in this Report;

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- 5. Determine that the Project is categorically exempt from the provisions of the California Environmental Quality Act (CEQA) pursuant to Article 19, Section 15301(d) [Restoration or rehabilitation of deteriorated or damaged structures, facilities, or mechanical equipment to meet current standards of public health and safety] and Section 15330 [Minor cleanup actions taken to prevent, minimize, stabilize, mitigate, or eliminate the release or threat of release of a hazardous waste or substance which are small or medium removal actions costing \$1 million or less] of California CEQA Guidelines and Article III, Section 1, Class 1(4) of City CEQA Guidelines, and direct RAP staff to file a Notice of Exemption (NOE) with the Los Angeles County Clerk and the Governor's Office of Land Use and Climate Innovation:
- 6. Authorize RAP's Chief Accounting Employee to prepare a check to the Los Angeles County Clerk in the amount of \$75.00 for the purpose of filing an NOE; and,
- 7. Authorize RAP staff to make technical corrections as necessary to carry out the intent of this Report.

#### **SUMMARY**

Chatsworth Park South is located at 22360 West Devonshire Street in the Chatsworth community of the City. This 73-acre facility provides a Recreation Center with seasonal and recreational programming, pickleball courts, horse and walking trails, basketball courts, baseball field, and a children's playground for the surrounding community. City of Los Angeles Historic-Cultural Monument No. 113, is located at this site. Due to the facility's size, features, programs and services it provides, Chatsworth Park South meets the standard for a Regional Park, as defined in the City's Public Recreation Plan.

Historically, Chatsworth Park South was used as a Small Arms Firing Range (SAFR). Due to this historical use, there is elevated presence of metals, specifically lead, and polynuclear aromatic hydrocarbons (PAHs) in the soil. Therefore, on September 5, 2008, RAP entered into a Voluntary Cleanup Agreement (VCA) with the California Department of Toxic Substances Control (DTSC) to oversee the soil investigation process and remediation.

On June 5, 2013, the Board approved the Preferred Alternative (Alternative 3) of the Chatsworth Park South Remedial Action Plan (Report No. 13-155). Alternative 3, the Capping Alternative, included the capping of contaminated soil in place with an engineered cap. On July 9, 2014, the Board approved the final plans for the Chatsworth Park South - Remedial Action Plan (Report No. 14-192). On November 19, 2014, the Board approved the revised final plans and specifications for the Chatsworth Park South-Rehabilitation Project (PRJ20361) (W.O. # E170331F) (Report No. 14-286). On June 18, 2015, the Board awarded Contract No. 3528 to American Integrated Services, Inc. (Report No. 15-141). The scope of work included the remediation of lead contamination and redevelopment of park and recreational amenities on an approximately 21-acre area of the park.

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The remediation took place in 2016, and included excavation and disposal of 496 tons of hazardous waste; 5,773 tons of grubbed material and excess excavated soil; import of 56,281 tons of clean soil; 6,900 tons of crushed aggregated base, and construction of a 1-foot engineered surface cap over the remaining impacted soil. The cap was constructed over 915,000 square feet with a 1-foot by 1-foot triangular High-Density Polyethylene (HDPE) geogrid to prevent burrowing animals.

After completion of the remedial work and redevelopment of the park, on December 16, 2021, the Board approved RAP entering into a Land Use Covenant (LUC) with the DTSC (Report No.21-214) outlining the environmental restrictions and an approved Operations and Maintenance (O&M) Plan for the use of approximately 21 acres of remediated and redeveloped area of the park.

As part of the required long-term O&M activities under the LUC with DTSC, RAP is required to monitor and protect the engineered soil cap overlaying the impacted soils through maintaining the engineering controls (i.e. fences), annual land surveying and inspection checklist, and a Five-Year Review report. The Five-Year Review report requires RAP to hire a consultant to assess and summarize the remedy effectiveness in the first five-year period since the LUC was executed.

The Five-Year Review (Attachment 2) was completed on July 22, 2025 with the assistance of Roux Associates, Inc. (Roux), which is one of RAP's on-call environmental consultants selected through competitive bid. The Five-Year Review identified the following issues:

- Four areas of the cap identified in the maps as Significant Erosion Areas (SEAs) 1 through 4 were observed or reported to have eroded to the point of breaching the geogrid exposing the impacted soil beneath. There is inadequate O&M of the physical remedial structures (See the attached maps and Photographs 11 through 15, 20, and 21 in the Five-Year Review).
- Erosion has occurred in a number of locations down to the geogrid. The park maintenance team regularly makes repairs to these areas but in some locations, the cap cover is likely no longer the full 1-foot depth. Typical repairs include replacing the washed-out soil, if present, and filling voids with degraded granite (Five Year Review, Attachment 2 Photograph 22). The degraded granite areas are more porous than the original cap material and become preferential pathways during subsequent rain events. This is resulting in excessive maintenance requirements for the cap.
- The detention basins have become overgrown to the point that inspection was difficult (Five Year Review Attachment 2 Photographs 16 through 18).
- There is evidence of burrowing animals throughout the cap (Five Year Review, Attachment 2 Photograph 19).
- There is evidence of regular foot traffic through some of the fenced areas. RAP Maintenance has indicated that the gate locks are regularly broken, and people access the areas to use like a dog park (Five Year Review, Attachment 2 Photographs 23 and 24). Current barriers/warnings are not adequate to restrict access.

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 Park maintenance staff appear to be unaware of the purpose of the cap and the urgency for repairs when the integrity of the cap is compromised. There are inadequate monitoring activities to maintain the protectiveness of the remedy.

DTSC reviewed the Five-Year Report and provided comment in a review letter dated June 25, 2025 (Attachment 3) and is requesting that RAP alert park staff to restrict public access to the areas of the failing cap until a sampling and repair workplan can be created, submitted, and approved by DTSC and the subsequent repairs and studies completed. RAP Environmental is ready to proceed with engaging a consultant to complete the necessary studies, reporting, project oversight, and staff training when funding has been approved.

Additionally, RAP Environmental recommended immediately acquiring and erecting fencing and signage to restrict public and staff access to the areas where the engineered cap is failing (SEA1 to SEA4); which RAP Maintenance had completed by August 25, 2025.

#### PROJECT SCOPE

The scope of work of the Chatsworth Park South – Remedial Cap Maintenance and Repairs (PRJ21885) Project includes the following:

- Remedial cap repairs in four areas of significant erosion;
- A land survey, to determine any potential changes in the elevation;
- A Climate Vulnerability Assessment, to evaluate the potential impact of more significant storm events on the cap;
- A Sea Level Rise Vulnerability Assessment;
- Completion report documenting the repairs, to be prepared by a consultant; and
- Staff training on how to properly care for and maintain the cap.

#### PROJECT FUNDING

Upon approval of this Report, \$704,429.62 in Park Fees can be committed to the proposed Project, which is the total budget including budget contingency.

See below the anticipated pre-qualified on-call contract(s) and budget contingency amount(s) that will be used for the Project:

On-Call Contract	Contingency Amount
Environmental Site Assessment and Remediation Services	\$10,000.00
On Call Landscape Contractor	\$100,000.00

The Park Fees were collected within 10 miles of Chatsworth Park South, which is the standard distance for the commitment of Park Fees for regional recreational facilities pursuant to Los Angeles Municipal Code Section 12.33 E.3.

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#### **FUNDING SOURCE MATRIX**

Source	Fund/Dept/Acct	Amount	Percentage
Park Fees	302/89/89718H	\$563,292.87	80%
Park Fees	302/89/89716H	\$141,136.75	20%
Total		\$704,429.62	100%

#### PROJECT CONSTRUCTION

RAP Staff has determined that sufficient funding has been identified for the Project.

See below the anticipated Project schedule:

Phase	Duration
Predesign	October 2025
Design	November 2025
Bid and Award	December 2025 – January 2026
Construction	January 2026 – April 2026
Post Construction	October 2026

#### TREES AND SHADE

The proposed Project has no impact on the existing shade and trees at Chatsworth Park South.

#### ENVIRONMENTAL IMPACT

On June 5, 2013 the Board approved the Alternative 3 of the Chatsworth Park South Remedial Action Plan (Report No. 13-155) and adopted an Initial Study/Mitigated Negative Declaration (IS/MND) (SCH 2013031066). A Notice of Determination was filed with the Los Angeles County Clerk on June 6 2013. The Project proposed in this Board Report consists of rehabilitation of deteriorated structure that was evaluated on June 5, 2013 and has the goal to meet current standards of public health and safety. The proposed Project can also be framed as a minor action to prevent the threat of release of hazardous substances.

According to the parcel profile report retrieved on August 26, 2025, this site is not within a coastal, methane, historic protection or liquefaction zone, so there is no reasonable possibility that the proposed Project may impact on an environmental resource of hazardous or critical concern. No other known projects would involve cumulatively significant impacts, and no future projects would result from the proposed Project. As reported by the State Department of Toxic Substances Control (DTSC) (Envirostor at www.envirostor.dtsc.ca.gov), the State Water Resources Control Board (SWRCB) (Geotracker at https://geotracker.waterboards.ca.gov/) and previously in this report, the site (Site number 60000893) has been remediated under the oversight of the DTSC. DTSC approved the Operation and Maintenance Plan and Agreement in 2020 and signed a LUC

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in 2022. The site has been in compliance with the LUC and the actions included in this Report are intended to keep it compliant. No disturbance of hazardous material is expected and Envirostor and Geotracker do not list any other contaminated sites near the Project area (within 1,000 feet). According to the Caltrans Scenic Highway Map, there is no scenic highway located within or adjacent to the Project site. The proposed Project is located in the vicinity of Minnie Hill Palmer House, listed in the National Register of Historic Places (NHRP) with number 79000480, in the California Register of Historic Landmarks with number 21173 and classified as City of Los Angeles Historic Cultural Monument (HCM) N. 133 – this house is the only remaining homestead cottage in the San Fernando Valley. The proposed Project will not affect the historic site and will not cause a substantial adverse change in the significance of any historical resource.

Based on this information, staff recommends that the Board of Recreation and Park Commissioners (Board) determines that the proposed Project is categorically exempt from the provisions of the California Environmental Quality Act (CEQA) pursuant to Article 19, Sections 15301(d) and 15330 of California CEQA Guidelines and Article III Section 1, Class 1(4) of City CEQA Guidelines. Staff will file a Notice of Exemption with the Los Angeles County Clerk and the Governor's Office of Land Use and Climate Innovation upon Board's approval.

#### FISCAL IMPACT

The approval of this commitment of Park Fees will have no fiscal impact on RAP's General Fund. The estimated costs for the design, development, and construction of the proposed park improvements are anticipated to be funded by Park Fees or funding sources other than RAP's General Fund. The maintenance of the proposed park improvements may be performed by current staff with the additional training with minimal impact to existing maintenance service at this facility.

This Report was prepared by Lisa Walldez, Environmental Specialist III, Planning, Maintenance and Construction Branch.

#### **LIST OF ATTACHMENTS**

- 1) Attachment 1 Work Order List
- 2) Attachment 2 Final Five-Year Review Report with maps Roux Associates (Dated July 22, 2025)
- 3) Attachment 3 Department of Toxic Substances Control (DTSC) Review of Five-Year Review, 22360 DEVONSHIRE STREET, CHATSWORTH Letter (Dated June 25, 2025)

## LIST OF WORK ORDERS FOR CHATSWORTH PARK SOUTH OUTDOOR PARK IMPROVEMENTS (PRJ21885) PROJECT

FUNDING SOURCE	FUND/DEPT./ACCT. NO.	WORK ORDER NO.
Park Fees	302/89/89718H	QP004670
Park Fees	302/89/89718H	QP004515
Park Fees	302/89/89718H	QP004833
Park Fees	302/89/89718H	QP004751
Park Fees	302/89/89716H	QT074504
Park Fees	302/89/89716H	QT072622
Park Fees	302/89/89718H	QP004143
Park Fees	302/89/89718H	QP004199
Park Fees	302/89/89716H	QM181739
Park Fees	302/89/89718H	QP004159
Park Fees	302/89/89718H	QP004156
Park Fees	302/89/89718H	QP004178
Park Fees	302/89/89718H	QP004158
Park Fees	302/89/89718H	QP004305
Park Fees	302/89/89718H	QP004875
Park Fees	302/89/89718H	QP004251
Park Fees	302/89/89718H	QP004344
Park Fees	302/89/89718H	QP004165
Park Fees	302/89/89718H	QP004749
Park Fees	302/89/89718H	QP004603
Park Fees	302/89/89718H	QP004642
Park Fees	302/89/89718H	QP004644
Park Fees	302/89/89718H	QP004946
Park Fees	302/89/89718H	QP004396
Park Fees	302/89/89718H	QP004445
Park Fees	302/89/89718H	QP004397
Park Fees	302/89/89718H	QP004358
Park Fees	302/89/89718H	QP004803



July 25, 2025

Melissa Marin California EPA – DTSC Project Manager 9211 Oakdale Avenue Chatsworth, California 91311-6505

Subject: Five-Year Review Chatsworth Park South 22360 West Devonshire Street Chatsworth, California 91311 Assessor's Parcel No. 2723-010-904

#### Dear Melissa Marin:

In accordance with the requirements pursuant to the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Section 121 (c), the National Oil and Hazardous Substances Pollution Contingency Plan (NCP Section 300.400 (f) (11), and the Office of Solid Waste and Emergency Response (OSWER) directive 9355.7-03BP, for the referenced property, Roux, on behalf of the City of Los Angeles Department of Recreation and Parks (LARAP), is hereby submitting the revised Five-Year Review. The review consists of the report and site photographs. Please do not hesitate to contact me at (949) 795-6830, or Lisa Walldez of LARAP at (213) 202-2664, if you have any questions regarding this correspondence.

Sincerely,

Nancy Anglin PE Principal Engineer

# 5-YEAR REVIEW CHATSWORTH PARK SOUTH 22360 WEST DEVONSHIRE STREET CHATSWORTH, CALIFORNIA 91311 ASSESSOR'S PARCEL NUMBER 2723-010-904 APRIL 2025

#### 1. Introduction

Roux conducted this Five-Year Review on behalf of the City of Los Angeles Department of Recreation and Parks (LARAP) pursuant to the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Section 121 (c), the National Oil and Hazardous Substances Pollution Contingency Plan (NCP) Section 300.400 (f) (11), and the Office of Solid Waste and Emergency Response (OSWER) directive 9355.7-03B-P.

This review is required by the statute for the remedial effort conducted at Chatsworth Park South located at 22360 West Devonshire Street in Chatsworth, California, with the associated Los Angeles County Assessor's Parcel Number 2723-010-904 (Site).

#### 1.1. Purpose

The purpose of this Five-Year Review is to ensure that the remedial actions performed at the Site remain protective of public health and the environment and are functioning as designed.

#### 1.2. Physical Setting

The Site is located at the northwest corner of the San Fernando Valley where the valley floor abuts the adjacent Simi Hills/Santa Susana Mountains (Attachment 1 - Figure 1). The Site encompasses approximately 72 acres, of which approximately 21 acres (Attachment 1 - Figure 2) are developed with recreational facilities. These facilities include a 10,000-square foot recreation building, an adjoining fenced children's play area, parking lots, sand pit play area, two tennis courts, a basketball court, and landscaped fields. Residential housing abuts the Site boundary to the east; and undeveloped hillside terrain borders the Site to the north, west, and south. The Santa Susana Pass State Historic Park borders the Site to the north, south, and west. Various recreational trails for pedestrians, hikers, and equestrian use surround the park facility areas. A railroad right-of-way is adjacent to the north.

#### 2. Site Background

According to the Department of Toxic Substances Control's (DTSC's) online database (EnviroStor, 2025), historical topographic maps did not depict development on the Site until the 1969 historic topographic map, which shows one small structure and several unpaved roads on the Site. Reportedly, 21 acres of the Site were previously remediated due to the former Site use as a small arms firing range in the 1960s. LARAP purchased the Site and converted it into a park in 1978. The park was closed in 2008 when lead pellets and other contaminants were discovered on the Site, and LARAP entered into a voluntary Cleanup Agreement with the DTSC.

Previous environmental investigations at the Site from 2008 to 2012 identified metals and polynuclear aromatic hydrocarbons (PAHs) in soil as chemicals of concern (COCs) and delineated the extent of COCs at the Site. A Remedial Action Plan (RAP) was prepared in 2013 (URS, 2013) and implemented in 2016, which included vacuuming lead pellets, rough grading and grubbing of scrub brush, excavating soil up to approximately two feet below ground surface (bgs) in areas of planned replacement tree groves, and placing an engineered surface cap on the Site. The engineered surface cap was selected to mitigate potential inhalation, ingestion, and dermal contact exposure pathways for park occupants and visitors. Approximately 35,176 cubic yards (cy) of clean soil and 4,283 cy of crushed aggregate base (CAB) were imported and used for the engineered surface cap on the Site. The 1-foot engineered surface cap consisted of 10 inches of clean soil, 2 inches of CAB, and a layer of 1-inch by 1-inch triangular high-density polyethylene (HDPE) geogrid to prevent burrowing animals from disturbing the

cap. In total, approximately 915,000 square feet of engineered surface cap were installed at the Site. The Remedial Action Completion Report (RACR) was submitted in 2016 and approved by DTSC in 2017 (URS, 2016).

The Site is subject to institutional and engineering controls under a Land Use Covenant (LUC) with DTSC (DTSC, 2022), which includes long-term operation and maintenance (O&M) activities to monitor and protect the engineered surface cap and fencing.

#### 3. Site Chronology

Characterization and delineation of chemicals of potential concern (COPCs) at the Site occurred during three investigations – a preliminary investigation conducted in February and March 2008, the Supplemental Site Investigation (SSI) and Preliminary Endangerment Assessment (PEA) investigations in December 2009 and January 2010 (CEG&E, 2010), and additional sampling conducted in October 2012. Based on the results and recommendations of the approved SSI/PEA for the Site, LARAP and DTSC determined that further action was required for the Site's soil where with metals and/or PAH concentrations exceeded remedial action objectives (RAOs) protective of human health. The principal COCs associated with the LUC were lead and PAHs present at approximately 1 foot bgs.

Implementation of the DTSC-approved RAP (URS, 2013) occurred from April through December 2016. Documentation of the remediation activities are in the DTSC-approved RACR (URS, 2016). As described in the RAP for the Site, construction of an engineered surface cap over approximately 915,000 square feet of the remedial area occurred to eliminate the exposure pathway to the underlying COCs present from approximately 1 to 4 feet bgs. In addition, other specific areas were fenced to preclude entry. The remedial actions are summarized in more detail in the next section.

#### 4. Removal Actions

The Site was remediated pursuant to a RAP approved under Chapter 6.8 of Division 20 of the Health and Safety Code and implemented under the oversight of the DTSC. The RAP recommended that a deed restriction be required as part of the site remediation, since hazardous substances, including lead up to 10,000 milligrams per kilogram (mg/kg) and PAHs up to 8,000 mg/kg, remained at the Site above levels acceptable for unrestricted land use. Subsequent to public comment, the RAP, which contained a summary of the Human Health Risk Assessment (Tetra Tech, 2010), together with a negative declaration pursuant to the California Environmental Quality Act, Public Resources Code section 21000 et seq., were approved by DTSC on July 23, 2013 (DTSC, 2013).

As excerpted from the O&M Plan (AECOM, 2016 and revised 2017 and 2019) the following summarizes the remedial actions implemented at the Site (Section numbers updated for this document and minor grammatical changes have been made to the text).

#### "4.1 Engineered Cap and Drainage System Construction

This section summarizes the major activities conducted during the installation of the engineered surface cap and the surface water drainage system improvements...

#### 4.1.1 Grading and Waste Export

The Site was rough graded in accordance with the grading plan and the soil was compacted to approximately 90 percent relative compaction. Grading included site "grubbing", i.e., the removal of all surface and near surface organic matter (including grass, shrubs, stumps, roots, etc.). Following rough grading, the soil was excavated to a depth of 2 feet bgs within the perimeters of the replacement tree groves.

Subsequent to rough grading the Site, soil excavation was conducted to construct utility trenches for the below grade portion of the water distribution and stormwater drainage system and to excavate the four detention basins. Soil from the utility trenches was stockpiled temporarily along the alignment of the trenches and used to backfill the

trenches following installation of the drainage pipes. If required, the excess soil remaining after utility installation and excavation of the four detention basins was included in the rough grading operations to meet the project grading contours.

Grubbed material and excess soil were stockpiled on plastic sheeting and covered with plastic sheeting, sampled for profiling purposes, and transported offsite, as non-hazardous waste or non-Resource Conservation and Recovery Act (RCRA) hazardous waste, to a RAP-approved facility. Approximately 5,773 tons of grubbed material and excess excavated soil were lawfully transported offsite for disposal as nonhazardous and non-RCRA hazardous waste.

#### 4.1.2 Testing and Approval of Imported Soil and Base

Prior to import to the Site, clean soil and CAB were tested at a minimum frequency of one sample per 1,000 cy. Testing generally followed the DTSC Information Advisory, Clean Imported Fill Material guidance document dated October 2001. The test results were submitted to DTSC for review and approval prior to import. In total approximately 56,300 tons of clean soil and 6,900 tons of CAB were imported and placed at the Site.

#### 4.1.3 Cap Construction

The engineered surface cap is the primary mitigation element to eliminate the exposure pathways through which park occupants and visitors could be exposed to potential inhalation, ingestion, and dermal contact with COCs.

The surface cap is shown in cross section on Attachment 1 - Figure 3 for both the turf areas and the tree groves. For all remedial areas other than the protected and replacement tree areas, a 1-foot surface cap was constructed. From top to bottom, the cap consisted of 10 inches of clean soil to support turf growth, 2 inches of virgin CAB to provide a wear-resistant foundation layer and to allow drainage, and a layer of 1"x1" triangular HDPE geogrid to prevent burrowing animals from disturbing the cap.

Approximately 35,176 cy of clean soil and 4,283 cy of CAB were imported to the Site for the construction of the cap. The sprinkler system distribution piping was installed on top of the geogrid placed over the base native soil.

In total, approximately 915,000 square feet of engineered surface cap were installed. In addition to approximately 4 acres of tree groves, the surface cap was vegetated and/or covered with 6,590 shrubs, native grass hydro-seed, and mulch to provide long-term erosion protection for the engineered cap.

#### 4.2 Replacement Tree Groves

To mitigate the loss of trees associated with surface cap installation, approximately 4 acres of replacement tree groves were implemented. Approximately 335 replacement trees were planted during this activity. Areas located within the boundary of the surface cap were prepared for planting of native tree species as required by the City of Los Angeles. Prior to tree removal, the LARAP forester assessed the habitat quality of the existing trees. Removed trees were replaced with an equal or higher quality habitat. The trees were planted in areas excavated and backfilled with 3 feet of clean soil, i.e., 2 feet of soil to fill the original excavation and 1 foot to match the grade of the surface cap. In addition to its habitat value, the trees will provide long-term erosion protection for the engineered cap within the tree groves.

#### 4.3 Drainage System Improvements

The drainage system was designed to control runoff from upslope areas for a 10-year storm event and, thereby, protect the surface cap from erosion. An overview of the

drainage system is presented in Attachment 1 - Figure 4. The full details of the drainage system are presented in the construction plan set (Appendix D of the O&M Plan).

The completed remedial activities did not alter the historical drainage patterns or significantly impact the rate of storm water runoff. The portion of the Site north and west of the Chatsworth Park South access road will drain to a permanent drainage bioswale with erosion protection features whose alignment follows the original drainage swale roughly west to east through the northern portion of the Site. Storm drain inlets set flush in the surface cap will promote drainage of the relatively flat areas of the Site. The drainage swales will discharge into a set of four detention basins. The purpose of the detention basin is to capture sediment entrained in the runoff and modulate flow to the offsite drainage channel that drains to the City of Los Angeles' public stormwater system. For a 10-year storm, the peak discharge into the detention basin is approximately 188 cubic feet per second (cfs). The maximum water depth within the detention basins will be approximately 3 feet. The basins were constructed as part of grading and capping operations and are cobble-lined. The basins are fenced off and accessible only by maintenance staff.

As shown in the construction plans (Appendix D of the O&M Plan), the stormwater drainage system included the following improvements:

- Main drainage bioswale
- Perimeter cobble-lined swales
- Conveyance piping and storm drains
- Four cobble-lined detention basins and outlet structure
- Fencing integrated with the detention basins and perimeter swales"

Roux evaluated the annual inspection documents completed by LARAP on August 2, 2022; July 24, 2023; and July 24, 2024. No obvious deficiencies were identified. Copies of these documents were previously submitted to the DTSC.

#### 5. Five-Year Review Process

Roux conducted a physical inspection of the Site as required by the Five-Year Review process. The inspection was conducted by Nancy Anglin, a Professional Civil Engineer, in April 2025. As part of the inspection, Nancy Anglin interviewed and walked the site with Mr. William Cerezo, an LARAP employee who has been part of the Site maintenance team for over five years. In general, the cap and fencing were in good condition. Photographs from the Site inspection and a corresponding annotated map are included as Attachment 2. However, several issues were noted during the Site inspection and are described in Section 7. A copy of the Five-Year Review Inspection Form is included as Attachment 3.

#### 6. Technical Assessment

Question A: Is the remedy functioning as intended by the remedy selection decision documents?

No, the cap has eroded and breached the geo grid in some areas.

Question B: Are the remedial objectives, goals, and criteria used at the time of the remedy selection still valid?

Yes.

Question C: Have there been any significant changes in the distribution or concentration of the subsurface lead or PAHs at the Site?

Unknown, sampling may be needed to confirm if contaminated soil has migrated as a result of the cap breach.

Question D: Has any other information come to light that could call into question the protectiveness of the remedy?

No.

Question E: Are any modifications needed to make the O&M Plan more effective?

Yes, add a comprehensive training section that outlines the regular training requirements for park staff. This section should cover the appropriate procedures for conducting repairs and clearly specify the situations that necessitate notifying the O&M Coordinator.

#### 7. Issues

The following issues were identified during the five-year review inspection:

- Four areas of the cap were observed or reported to have eroded to the point of breaching the geo grid exposing the impacted soil beneath (Figure 1). There is inadequate O&M of physical remedial structures (Attachment 2 Photographs 11 through 15, 20, and 21).
- Erosion has occurred in several locations down to the geo grid. The park maintenance team regularly makes repairs to these areas but in some locations, the cap cover appears to be less than the full one-foot depth. Typical repairs include replacing the washed out soil, if present, and filling voids with degraded granite (Attachment 2 Photograph 22 shows a typical repair area). The degraded granite areas are more porous than the original cap material and become preferential pathways during subsequent rain events. This is resulting in excessive maintenance requirements for the cap.
- The detention basins have become overgrown to the point that inspection was difficult (Attachment 2 Photographs 16 through 18).
- There is evidence of burrowing animals throughout the cap (Attachment 2 Photograph 19).
- There is evidence of regular foot traffic through some of the fenced areas. Mr. Cerezo indicated
  that the gate locks are regularly broken, and people access the areas to use like a dog park
  (Attachment 2 Photographs 23 and 24). Current barriers/warnings are not adequate to restrict
  access.
- Park maintenance staff appear to be unaware of the purpose of the cap and the urgency for repairs when the integrity of the cap is compromised. There are inadequate monitoring activities to maintain the protectiveness of the remedy.

#### 8. Conclusions

Repairs to the areas of the cap that have eroded beneath the geo grid must be made for the cap to again to be protective of human health and the environment. The remaining issues identified in Section 7 should be addressed in a timely manner.

#### 9. Recommendations

Based on the findings presented in this five-year review Site inspection and technical assessment, the following tasks are recommended:

- Immediate repairs are needed in the areas where the cap has been breached below the geo grid:
  - Retain the services of Hazardous Waste Operations and Emergency Response (HAZWOPER)-trained staff/contractor to repair the damage and restore the surface cap to its original condition.
  - Any soil excavated beneath the geo grid as part of the repair must be managed in accordance with the Soil Management Plan (Appendix C of the O&M Plan).
  - Notify the DTSC of the repairs in accordance with Section 4.4.1 of the O&M Plan.

- Evaluate for potential migration of impacted soil in the areas where the cap and associated geogrid have been breached.
- Evaluate all areas where erosion regularly occurs and provide a more rigorous repair. The
  repair contractor should evaluate these areas with Mr. Cerezo as he has historical familiarity
  with the areas that regularly erode.
- Clear the detention basins of debris and excess growth so an inspection can be performed.
- Evaluate if the geo grid is successfully preventing burrowing animals from breaching through into the contamination zone.
- Add signage to the fenced areas where regular foot traffic is occurring to discourage entry.
- Update the O&M Plan and provide training to the site maintenance team regarding the requirements of the O&M Plan, including when to notify of issues and when HAZWOPERtrained staff/contractor repairs are necessary.

These recommendations should be completed as soon as possible and no later than September 30, 2025 (before the start of the next rain season). A follow-up report should be generated describing the actions taken to remedy the current issues.

#### 10. Cost Impacts

Based on the issues identified during the physical inspection of the soil cap and our experience with similar sites, we anticipate a rough order of magnitude (ROM) cost to implement the repairs, clear debris, add signage, update the O&M Plan, and provide training outlined in our recommendations to be approximately \$500,000. This is a rough estimate and will be re-evaluated after site inspections are conducted by appropriate contractors.

#### 11. Statement of Protectiveness

The remedy does not currently protect human health and the environment. Upon completion of recommended repairs and action, the remedy should again protect human health and the environment.

#### 12. Next Five-Year Review

Based on the presence of contamination at levels which precludes unlimited use and unrestricted exposure, which is expected to continue at the Site, the next Five-Year Review will be prepared within five years from the date of this review.

Figure: 1 – Erosion Areas

Attachments: 1 - O&M Plan Figures

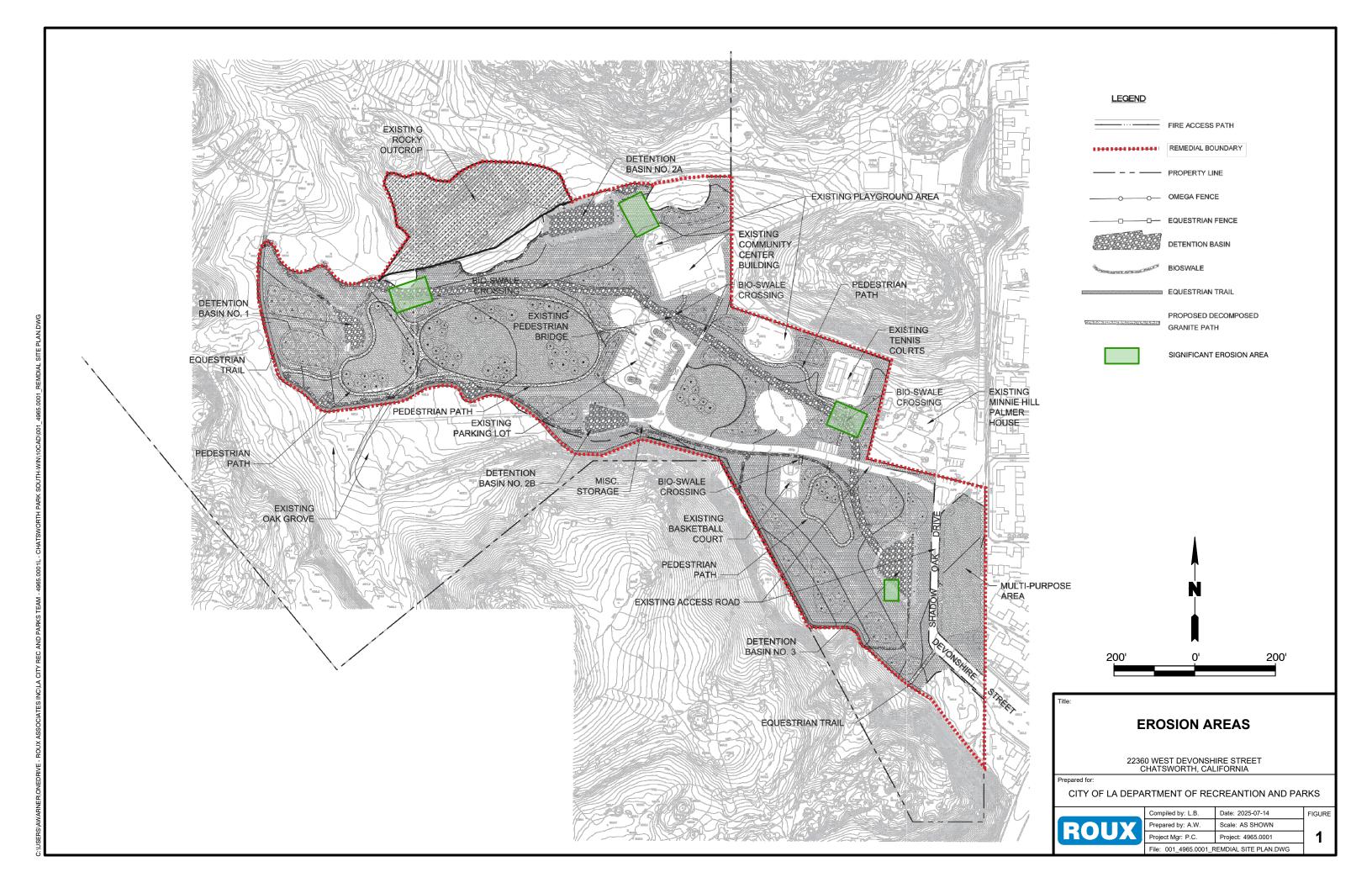
2 - Site Photographs and Annotated Map3 - Five-Year Review Inspection Form

#### 13. References

- AECOM Technical Services, Inc., Operation and Maintenance Plan, Chatsworth Park South, 22360 West Devonshire Street, Chatsworth, California, December 2016, revised November 2017, revised August 2019.
- California Environmental Geologists and Engineers, Inc., *Draft Supplemental Site Investigation and Preliminary Endangerment Assessment, Chatsworth Park South, APN 2723-010-904, 22360 West Devonshire Street, Chatsworth, California 91311*, December 15, 2010.
- Department of Toxic Substances Control, Remedial Action Plan Approval-Chatsworth Park South, 22360 Devonshire Street, Chatsworth, California, July 23, 2013.
- Department of Toxic Substances Control, Land Use Covenant and Agreement, Environmental Restrictions, County of Los Angeles, Assessor Parcel Number: 2723-010-904, Chatsworth Park South, DTSC Site Code 301384, June 23, 2022.
- Department of Toxic Substances Control, *EnviroStor website for Chatsworth Park South (60000893)*, https://www.envirostor.dtsc.ca.gov/public/profile\_report?global\_id=60000893, accessed in April 2025.
- Environmental Protection Agency, Comprehensive Five-Year Review Guidance, June 2001.
- Tetra Tech, Inc., Human Health Risk Assessment Report, Chatsworth Park South, Chatsworth, California, April 26, 2010.
- URS, Remedial Action Plan, Chatsworth Park South, 22360 West Devonshire Street, Chatsworth, California, February 15, 2013, and revised March 15, 2013.
- URS, Remedial Action Completion Report, Chatsworth Park South, 22360 West Devonshire Street, Chatsworth, California, December 20, 2016.

**FIGURES** 

1. Erosion Areas

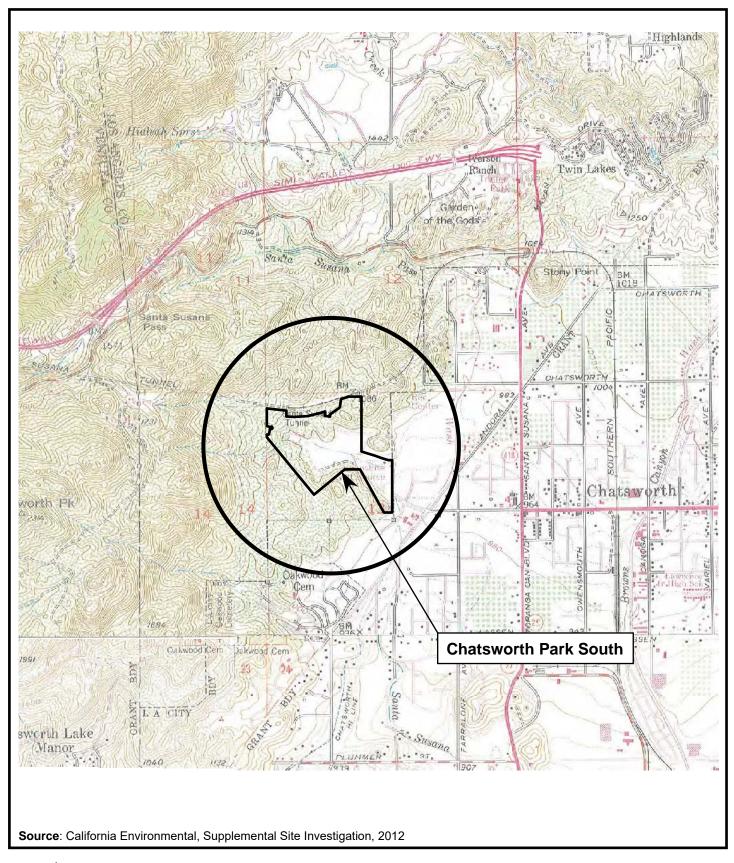


### **ATTACHMENTS**

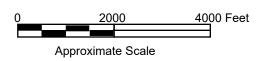
- 1. O&M Plan Figures
- 2. Site Photographs and Annotated Map
- 3. Five-Year Review Inspection Form

## **ATTACHMENT 1**

**O&M Plan Figures** 

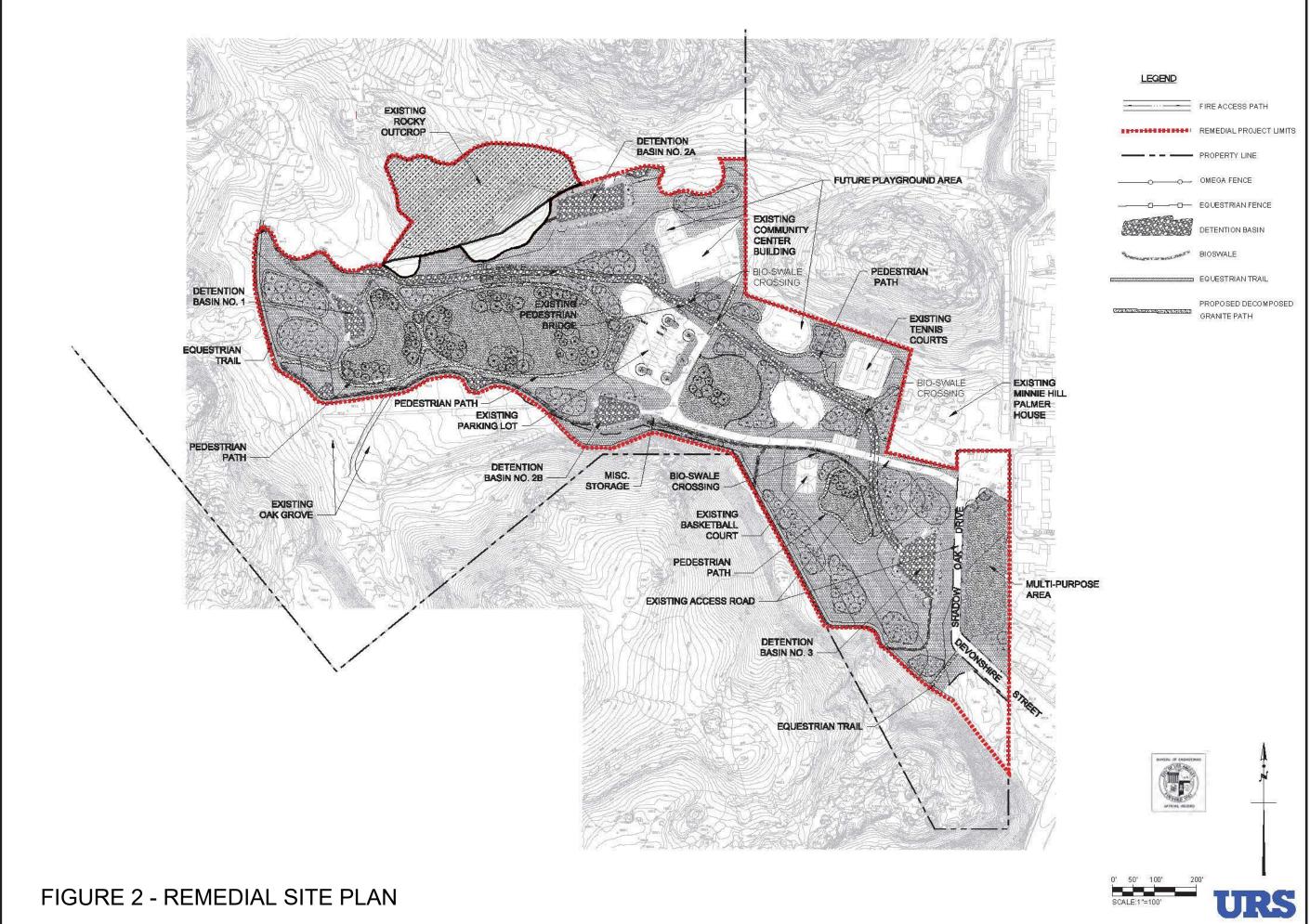






## **Site Location Map**

Chatsworth Park South 22360 Devonshire Street Chatsworth (City of Los Angeles), CA





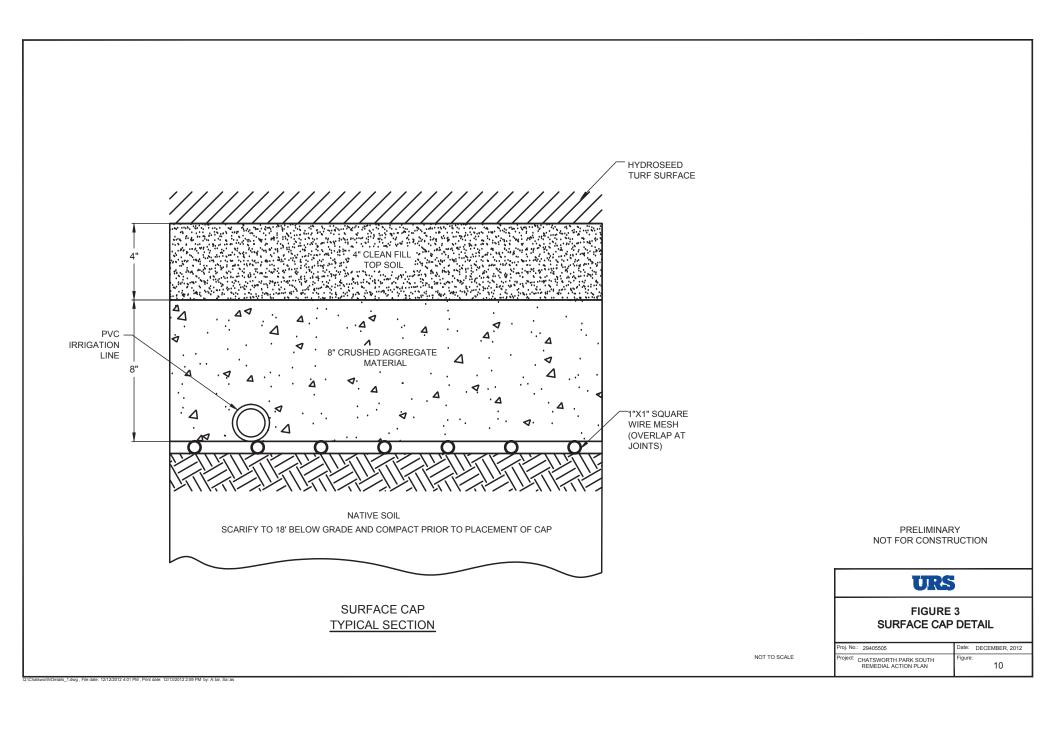


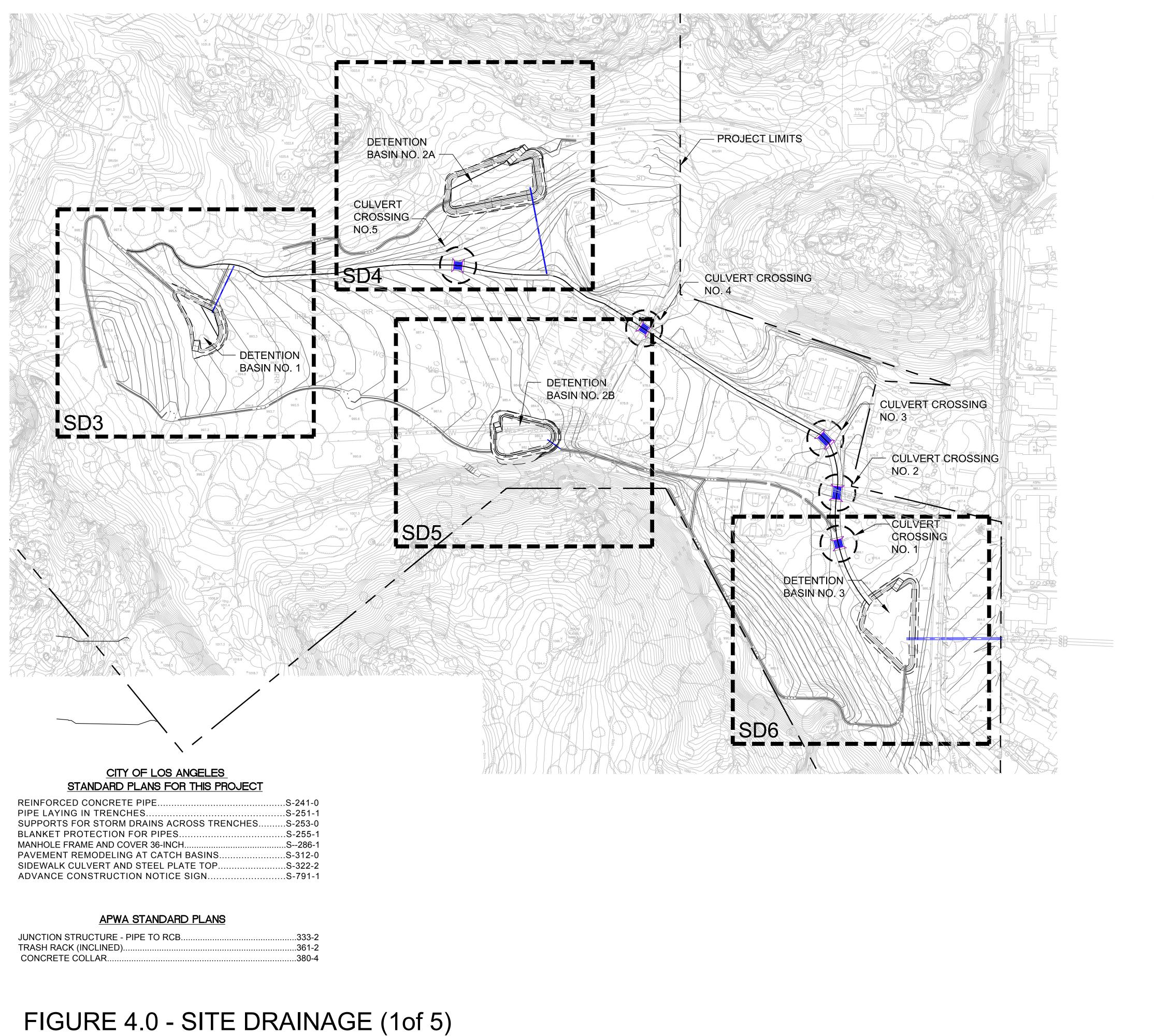
Chatsworth Park South

Chatsworth California 91311

ORAWN BY: APPROVED BY
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SCALE ISSUE DATE:
11/19/2014
WORK ORDER 8
E170231A

G7





CONSTRUCTION NOTES

1 CONSTRUCT BASIN GRADING PER PLAN A B SD7 SD7 SD7 SD7 SD7 SD7 SD8 SD8 SD9 SD9 SD10 SD

2 CONSTRUCT OUTLET RISER AND PIPE OUTLET PER DETAIL

3 INSTALL STORM DRAIN PER CITY OF LOS ANGELES STD. PLAN S-251-1

4 CONSTRUCT SPILLWAY PER DETAIL

6 7 9
SD12 SD13 SD14

5 CONSTRUCT INLET APRON PER DETAIL

5 SD19 SD13 SD14

21 22

6 CONSTRUCT STORM DRAIN OUTLET (

CONSTRUCT SUPPORT FOR EXIST UTILITY LINE ACROSS TRENCH PER CITY OF LOS ANGELES STD. PLAN S-253-0

8 JOIN EXIST CATCH BASIN PER APWA STD. PLAN S301-1

9 CONSTRUCT JUNCTION STRUCTURE PER STANDARD PLAN S301-1

(10) CONSTRUCT JUNCTION STRUCTURE PER STANDARD PLAN \$302-1.

CONSTRUCT CONCRETE WINGWALL PER 17 18 CALTRANS DETAIL D86B AND DETAIL SD18 SD18

12 INSTALL 15" DIA RCP (2000D) PER CITY OF LOS ANGELES STD. PLAN S-251-1 CASE 5 BEDDING INSTALLATION

**LEGEND** 

PROJECT LIMITS
PROPERTY LINE

 $\_$   $\_$   $\_$   $\_$  TOP/TOE OF SLOF

===== PROPOSED STORM DRAIN



THE CITY OF LOS ANGELES

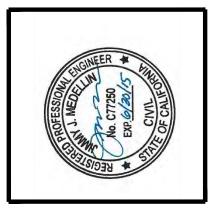
IMICHAEL A. SHULL

ASSISTANT GEN. MANAGER: RAMON BARAJA

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DATE.

DATE.



Chatsworth Park South

REVISIONS: DA

SITE DRAINAGE KEY MAP

DRAWN BY:

MG

SCALE:

1"=100'

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APPROVED B

JM

ISSUE DATE:

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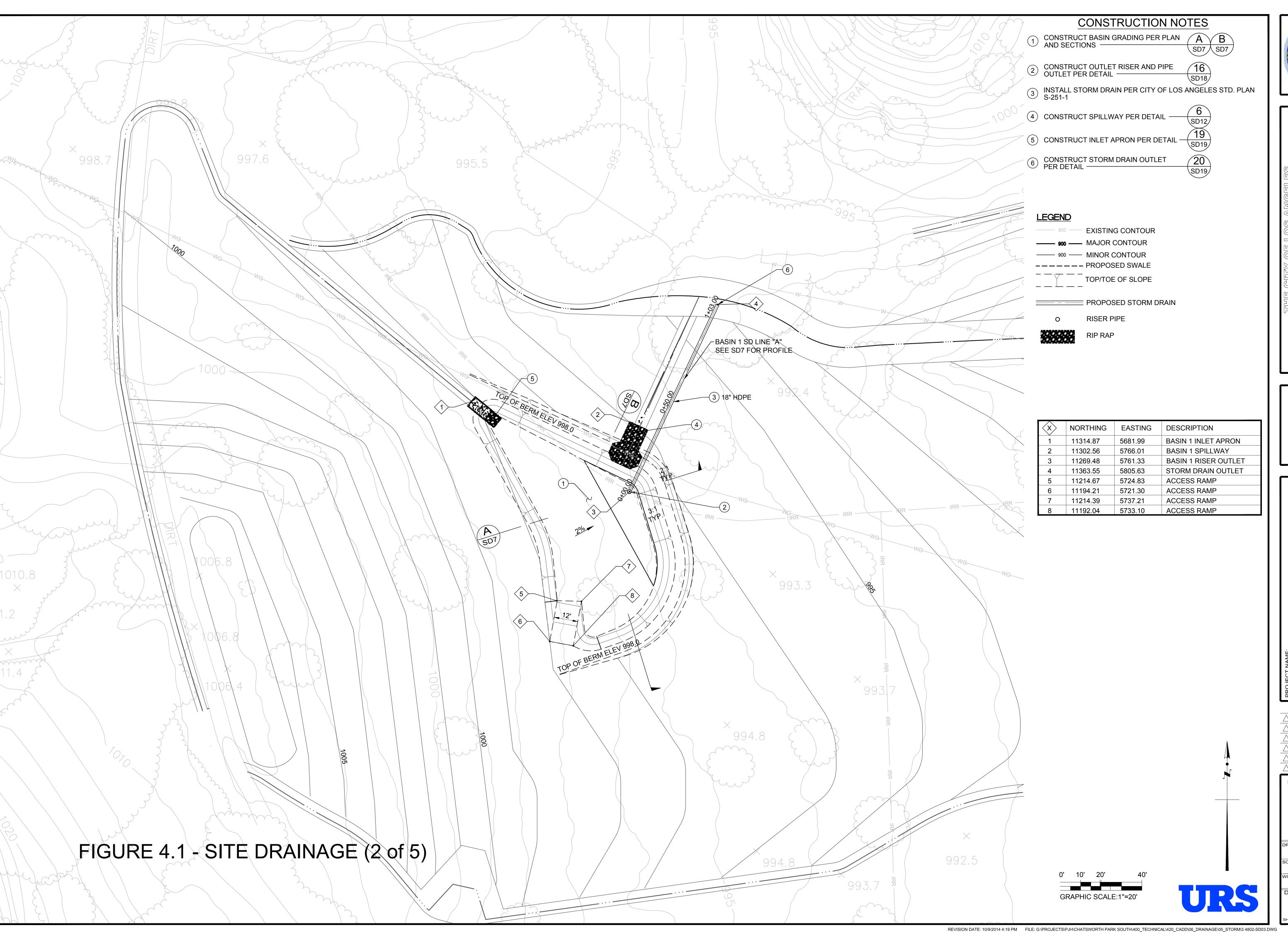
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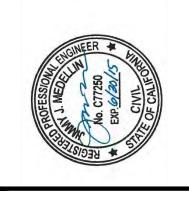
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THE GIT OEPARTMENT ()	GENERAL MANAGER: MICHAEL A. SHULL	GENERAL MANAGER:	ASSISTANT GENERAL MANAGER:	AS-BUILTS DRAWN BY:



Chatsworth Park South

REVISIONS: DA

PLAN NAME:

SITE

DRAINAGE
-BASIN 1

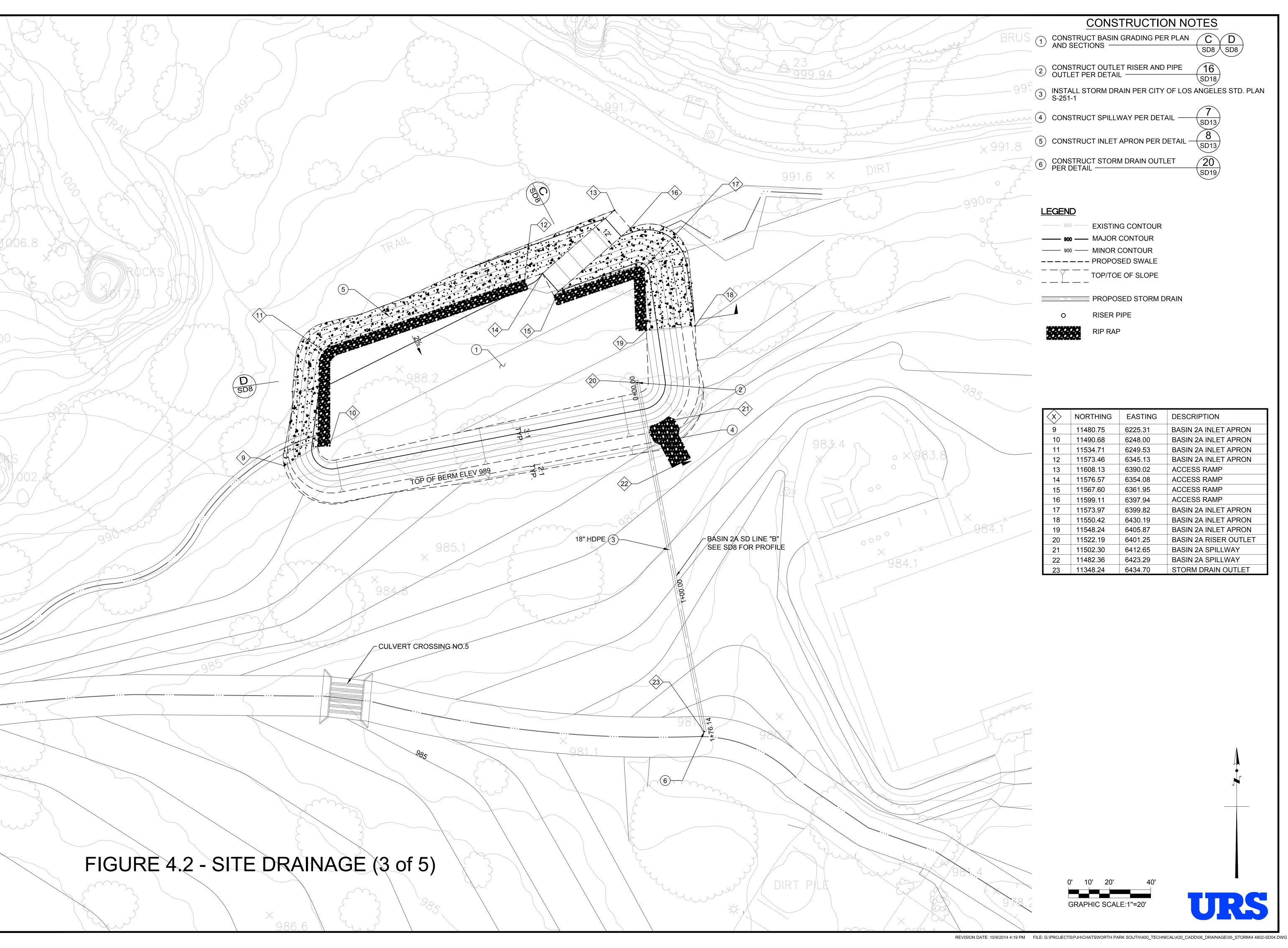
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DEPARTMENT OF RECREATION AND PARKS

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NERAL MANAGER:

DATE:

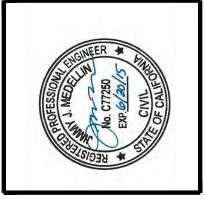
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Chatsworth Park Sout 22360 West Devonshire Street

REVISIONS: D.

PLAN NAME:

SITE

DRAINAGE
-BASIN 2A

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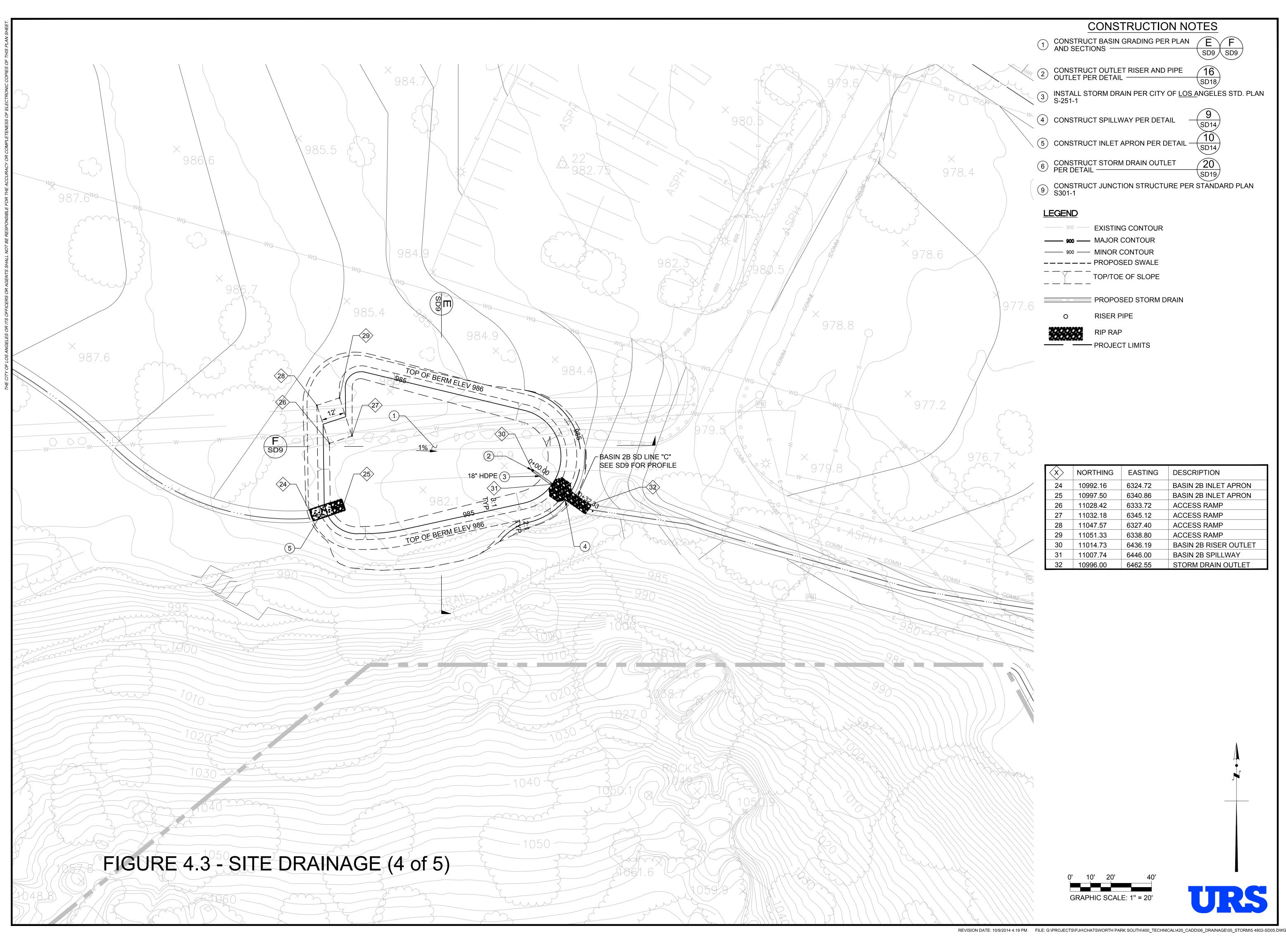
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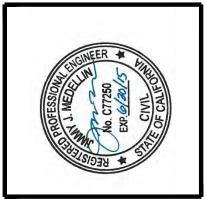
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SHEET 73 OF 117 SHEETS







Chatsworth Park South

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PLAN NAME:
SITE
DRAINAGE
-BASIN 2B

BASIN 2B
PLAN

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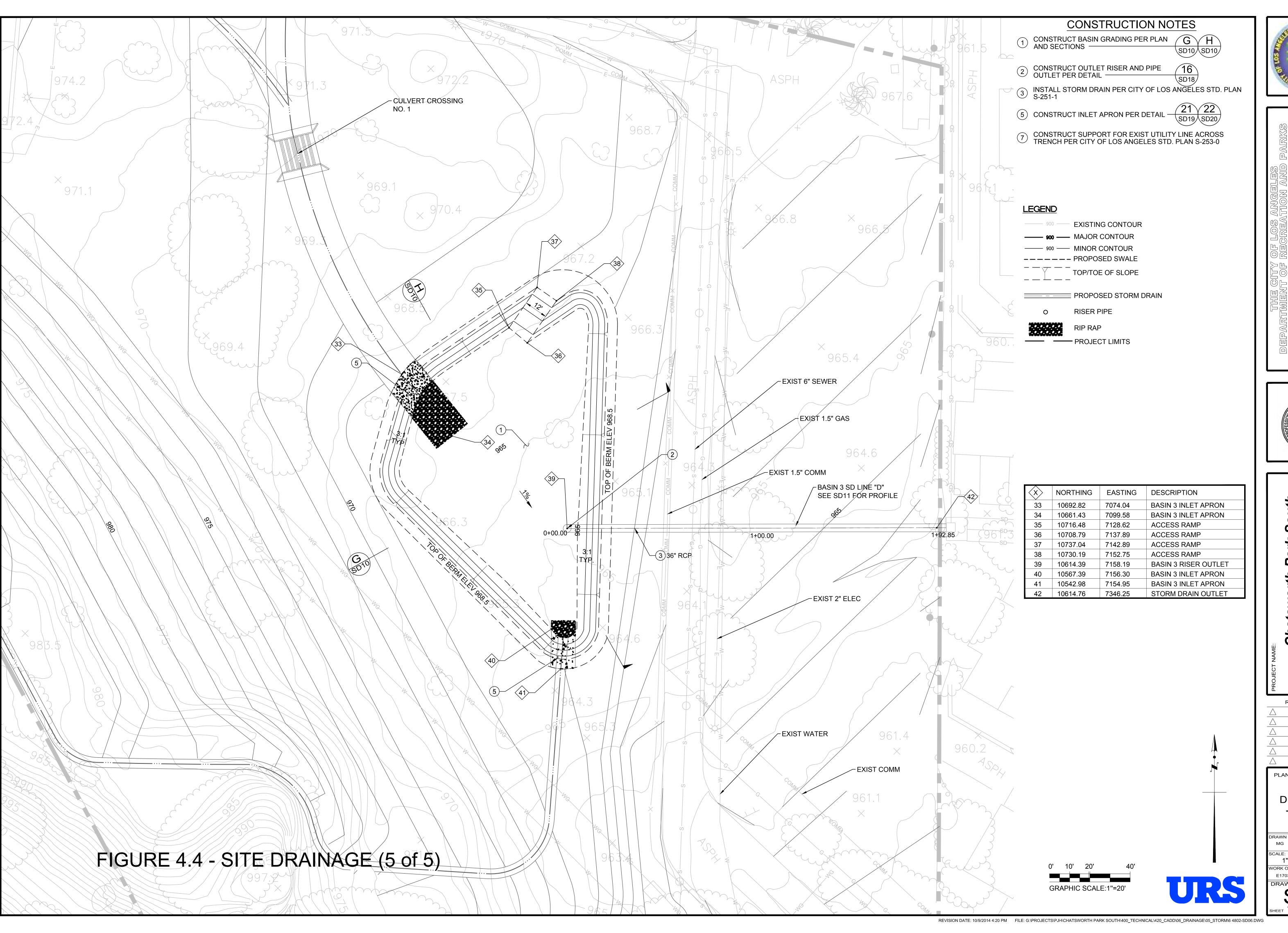
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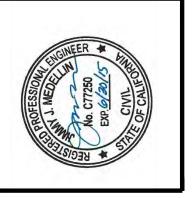
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117 SHEET 74 OF 117 SHEETS





THE CITY OF LOS ANGELES DEPARTMENT OF RECREATION AND PARKS	SENERAL MANAGER: MICHAEL A. SHULL ASSISTANT GEN. MANAGER: RAMON BARAJAS	JER:	:RAL MANAGER: DATE:	
L NLYWAEG	NERAL MANAGER:	ENERAL MANAGER:	SSISTANT GENERAL MANAGER:	



Chatsworth Park South

DRESS: 2230

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SITE
DRAINAGE
-BASIN 3
PLAN

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WORK ORDER # FILE NO.

DRAWING NO.

SD6
SHEET 75 OF 117 SHEETS

## **ATTACHMENT 2**

Site Photographs April 2025 and Annotated Map



1. Looking east from west side of Site



2. Looking northeast from south-central side of Site



Page 1 of 12 4965.0001L000



3. Looking northwest from southeast side of Site



4. Looking north-northwest along swale from southeastern side of Site



Page 2 of 12 4965.0001L000



5. Looking east-northeast from southwestern side of Site



6. View of rocky outcrop from northwestern side of Site



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7. Looking west from center of Site



8. View across community center parking lot



Page **4** of **12** 4965.0001L000



9. View of path being worn across swale between playground and picnic area



10. View across basketball court



Page **5** of **12** 4965.0001L000



11. View of eroded area behind community center playground with exposed geo grid



12. View of significant erosion beneath geo grid behind community center playground



Page 6 of 12 4965.0001L000



13. View of significant erosion beneath geo grid along swale near northwest end of Site



14. View of significant erosion beneath geo grid along swale near northwest end of Site



Page 7 of 12 4965.0001L000



15. View of significant erosion on southeast side of detention basin number 3



16. View into detention basin number 1



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17. View into detention basin number 2b



18. View into detention basin number 3



Page **9** of **12** 4965.0001L000



19. Typical burrowing animal hole visible throughout the cap area



20. Significant swale erosion area near tennis courts showing repair and best managment practices (BMP)



Page **10** of **12** 4965.0001L000



21. Significant swale erosion area near tennis courts showing repair and BMP



22. Typical shallow erosion repair using degraded granite along pathways



Page 11 of 12 4965.0001L000



23. Foot path visible in fenced area of southwest side of Site



24. Foot path visible in fenced area of southwest side of Site



Page 12 of 12 4965.0001L000



MF 300421



Chatsworth Park South 22360 West Devonshire Street Chatsworth, California 91311

REVISIONS: DATE:

PLAN NAME: PROJECT PLAN

SCALE: ISSUE DATE: 11/19/2014
WORK ORDER# FILE NO. E170331A DRAWING NO.

### **ATTACHMENT 3**

Five-Year Review Inspection Form

4965.0001L100/CVRS ROUX

#### **ATTACHMENT 3**

### **Annual Inspection Report**

Los Angeles Department of Recreation and Parks
Chatsworth Park South
22360 Devonshire Street
Chatsworth (City of Los Angeles), California

#### NARRATIVE OF OBSERVATIONS

The 5-year review site inspection was conducted on April 6 and 7, 2025. The weather on both days was sunny and the temperature was around 75°F. Nancy Anglin of Roux performed a general site walk on April 6, 2025, and met with Mr. William Cerezo, a City of Los Angeles Department of Recreation and Parks (LARAP) employee familiar with Chatsworth Park on April 7, 2025. Mr. Cerezo accompanied Ms. Anglin during the site inspection to help identify areas of concern.

After completing the two-day site inspection Ms. Anglin found that, in general, the cap is performing as designed. However, the following issues were identified during the inspection:

- Four areas of the cap were observed or reported to have eroded to the point of breaching the geo grid exposing the impacted soil beneath.
- Erosion has occurred in several locations down to the geo grid. The park maintenance team regularly makes repairs to these areas but in some locations, the cap cover appears to be less than the full one-foot depth. Typical repairs include replacing the washed out soil, if present, and filling voids with degraded granite. The degraded granite areas are more porous than the original cap material and become preferential pathways during subsequent rain events. This is resulting in excessive maintenance requirements for the cap.
- The detention basins have become overgrown to the point that inspection was difficult.
- There is evidence of burrowing animals throughout the cap.
- There is evidence of regular foot traffic through some of the fenced areas. Mr. Cerezo indicated that the gate locks are regularly broken, and people access the areas to use like a dog park.
- Park maintenance staff appear to be unaware of the purpose of the cap and the urgency for repairs when the integrity of the cap is compromised.

LAND-USE
Is the LUC Remedial Area continuing to be used for park related purposes?  Yes_X_No
If not, what purpose is it being used for, explain.

Provide additional descriptions and comments on separate pieces of paper and attach.

**CAP SYSTEM** (Inspection of the cap system should ensure that the engineered surface cap has not been disturbed or damaged in any way).

Are surface condition OK? Yes No X

If not, describe recommended action and schedule:

- Immediate repairs are needed in the areas where the cap has been breached below the geo grid:
  - Retain the services of Hazardous Waste Operations and Emergency Response (HAZWOPER)-trained staff/contractor to repair the damage and restore the surface cap to its original condition.
  - Any soil excavated beneath the geo grid as part of the repair must be managed in accordance with the Soil Management Plan (Appendix C of the O&M Plan).
  - Notify the DTSC of the repairs in accordance with Section 4.4.1 of the O&M Plan.
- Evaluate for potential migration of impacted soil in the areas where the cap and associated geogrid have been breached.
- Evaluate all areas where erosion regularly occurs and provide a more rigorous repair. The repair contractor should evaluate these areas with Mr. Cerezo as he has historical familiarity with the areas that regularly erode.
- Clear the detention basins of debris and excess growth so an inspection can be performed.
- Evaluate if the geo grid is successfully preventing burrowing animals from breaching through into the contamination zone.
- Add signage to the fenced areas where regular foot traffic is occurring to discourage entry.
- Update the O&M Plan and provide training to the site maintenance team regarding the requirements of the O&M Plan, including when to notify of issues and when HAZWOPER-trained staff/contractor repairs are necessary.

Submit Workplan: August 31, 2025

Initiate implementation by: October 1, 2025

Completion by: December 31, 2025

#### CONCLUSIONS AND RECOMMENDATIONS

#### Conclusions:

Repairs to the areas of the cap that have eroded beneath the geo grid must be made for the cap to again to be protective of human health and the environment. The remaining issues identified above should be addressed in a timely manner.

#### Recommendations:

See above description of recommended actions and schedule.

#### INSPECTOR CERTIFICATION

I hereby certify that the information contained in this report is true and accurate, based on information obtained through a reasonable inquiry and visual inspection. I further certify that I am fully authorized to provide this certification.

Name: Nancy Anglin, PE
Signature: A 1
Title: Principal Engineer
Date: April 8 2025







Katherine M. Butler, MPH, Director 9211 Oakdale Avenue Chatsworth, California 91311

https://dtsc.ca.gov/

June 25, 2025

SENT VIA ELECTRONIC MAIL

Elena Maggioni Environmental Specialist III City of Los Angeles Department of Recreation and Parks Planning, Maintenance and Construction Branch 221 North Figueroa Street, Suite 400 Los Angeles, California 90071 Elena.Maggioni@lacity.org

REVIEW OF FIVE-YEAR REVIEW, 22360 DEVONSHIRE STREET, CHATSWORTH (SITE CODE: 301384)

Dear Ms. Elena Maggioni:

The Department of Toxic Substances Control (DTSC) has reviewed the Five-Year Review, (ROUX, April 29, 2025) (Report) for Chatsworth Park South located at 22360 West Devonshire Street, Chatsworth (Site). The Report was reviewed pursuant to a Land Use Covenant entered into by DTSC and City of Los Angeles Department of Recreation and Parks (LADRP) on April 1, 2022.

The 72-acre Site is surrounded by hillside terrain of the Santa Susana Pass State Historic Park, a railroad, and residential housing. A portion of the Site was previously occupied by a small arm firing range (SAFR) from the early to mid-1960s. SAFR operations resulted in wide shallow spreading of lead shot and clay pigeon debris containing elevated polycyclic aromatic hydrocarbons (PAHs). The LADRP acquired the Site and developed 21 acres of the Site with recreational facilities during the 1970s-1980s. Investigations found significant amounts of lead pellets and clay pigeon debris on surface soils on the Site. Metals (lead, arsenic, antimony) and PAHs (benzo(a)pyrene-equivalent naphthalene) were identified as the primary contaminants of concern (COCs) in shallow soils (0-4 feet below ground surface [ft bgs]) and the constituents for remediation at the Site. The DTSC approved Removal Action Completion Report (April 20, 2017) documented mitigation of impacted soils and required a Land Use Covenant (LUC) which was executed between LADRP and DTSC

Ms. Elena Maggioni June 12, 2025 Page 2 of 5

on April 1, 2022. The LUC mandates annual and five-year inspections to ensure that the Site's remedy continues to protect human health and the environment.

The Report provides a summary of the first five-year inspection for the Site. It concludes that immediate repairs are needed in the areas where the cap has been breached below the geo grid. It also recommends that erosion prone areas be assessed, detention basins be cleared to check geo grid integrity, implementation of signage to discourage entry to exposed geo grid areas, and updating the Operations and Maintenance Plan (O&M Plan) that was approved by DTSC in January 2020 to ensure park staff are trained in maintaining the cap.

Below are comments from DTSC Project Manager, Geological Services Branch (GSB), Human and Ecological Risk Office (HERO), and Engineering and Special Projects Office (ESPO).

### **Project Manager comments:**

- 1. DTSC advises that areas in which the cap has eroded be completely restricted to public access until repairs can be made.
- DTSC recommends all projects undergo a sea level rise vulnerability assessment (SLRVA). Guidance on how to conduct the SLRVA can be found in DTSC's Sea Level Rise guidance available on our website <a href="https://dtsc.ca.gov/climate-change/">https://dtsc.ca.gov/climate-change/</a>.

#### **GSB** comments:

#### **General Comments**

#### 1. O&M Plan:

- a. Key personnel for O&M Plan implementation and associated Five Year Review activities are identified in the referenced O&M Plan. GSB recommends that the Report identify whether any changes to the key O&M personnel has occurred and that the appropriate notifications to DTSC and O&M Plan updates are performed. Future notifications, inspections, document certifications, etc., should be performed in accordance with the roles and responsibilities detailed in the O&M Plan.
- As part of the reporting requirements, a land survey is required annually to document potential changes in elevation. It does not appear that the land survey documentation has been submitted as part of the annual inspection reports.
   Based on the field observations and Site photographs, Site elevations would be

Ms. Elena Maggioni June 12, 2025 Page 3 of 5

expected to reflect the erosion or other surface changes to the cap areas. GSB recommends that a land survey is included to document repairs and to identify areas that may require further work.

### **Specific Comments**

- 1. Page 5, Section 5. Five-Year Review (FYR) Process: The Report indicates that a Site inspection was performed pursuant to the FYR process. GSB recommends that the inspection form/checklist documentation is provided as an attachment to the Report.
- 2. Page 6, Section 8. Conclusions, and Page 7, Section 9. Recommendations:
  - a. A number of issues were identified during the FYR process. Of particular concern are the areas where the engineered surface cap has eroded and in some cases, the geogrid has been breached and exposed the impacted soil beneath the cap area. GSB agrees with the recommendations for immediate repairs to the areas where the cap has been breached below the geogrid.
  - b. It is not clear if potential migration of impacted soil may have occurred in the areas where the cap and associated geogrid have been breached. GSB recommends that the areas where the cap and associated geogrid were breached are assessed to determine if exposed impacted soil was mobilized and transported away/above the engineered surface cap. A work plan for sampling activities should be submitted to DTSC for review and approval prior to implementing a field sampling program.
  - c. GSB concurs with the remaining recommendations to address the results of the technical assessment (Section 6) and identified issues (Section 7), and the associated preparation and submittal of a follow-up report to DTSC documenting actions taken for the approved remedy.
  - d. GSB notes that the engineered surface cap considered drainage system improvements for runoff control for a 10-year storm event. Given the significant erosion of the engineered surface cap in a number of areas at the Site, GSB recommends that as part of the FYR activities, a climate vulnerability assessment is performed to evaluate the potential impact of more significant storm events (e.g., 100-year storm event) on remedy effectiveness and protectiveness.

Ms. Elena Maggioni June 12, 2025 Page 4 of 5

3. Figures: GSB recommends that those areas of the Site with observed issues (e.g., significant erosion or exposed cap areas) are identified/labeled on the referenced figures to support field observations and discussion in the Report.

#### **HERO** comments:

1. HERO concurs with the conclusions of the report that repairs should be made immediately in areas where breaches to the cap occurred. A Work Plan proposing details of these repairs should be provided to DTSC for review and approval. HERO concurs with the recommendation to provide training to park staff on proper maintenance of the cap. The geo grid should be evaluated for its ability to prevent burrowing animals from breaching through the contamination zone. DTSC's Ecological Risk Assessment Section (ERAS) should review the report to evaluate the effects of the breach to burrowing animals and other wildlife in the area.

#### **ESPO Comments:**

 ESPO concurs with the conclusion and recommendations as presented proposing immediate repairs for the eroded areas. ESPO suggests submitting a tech memo workplan for the proposed repairs with cost details. Also, provide additional procedures for cap maintenance, should this become more frequent.

Based on the review, DTSC has identified discrepancies and deficiencies that require clarification, document revision, and resubmittal. Please submit a response to comments table and revised Report within 30 days of the date of this letter. Please submit a Work Plan that summarizes the details of all the repairs that need to be made to the impacted cap within 30 days of the date of this letter. If you have any questions, contact me at <a href="Melissa.Marin@dtsc.ca.gov">Melissa.Marin@dtsc.ca.gov</a>. Alternately, you may contact my Supervisor, Gregory Shaffer, at <a href="Gregory.Shaffer@dtsc.ca.gov">Gregory.Shaffer@dtsc.ca.gov</a>.

Sincerely,

Melissa Marin

**Environmental Scientist** 

Site Mitigation & Restoration Program

(See next page)

Ms. Elena Maggioni June 12, 2025 Page 5 of 5

Reviewed By:

Wendy Arima, P.G.

Senior Engineering Geologist Wendy S. James

Shukla Roy-Semmen, Ph.D.

Senior Toxicologist

Signature:

Shukla Roy-Semmen

Monal Gajjar

Senior Hazardous Substance Engineer

Signature:

Monal Gajjar

(Via e-mail) CC:

> **Gregory Shaffer Branch Chief**

DTSC | Site Mitigation & Restoration Program

Gregory.Shaffer@dtsc.ca.gov

Lisa Walldez General Manager Chatsworth Park South Lisa.Walldez@lacity.org

Peer reviewed by: Aisha Shareef, Project Manager, June 12, 2025

