CHAPTER IV
REVISIONS TO THE DRAFT EIR

A. INTRODUCTION

In accordance with Section 15132 of the CEQA *Guidelines*, this section presents the changes that were made to the Draft EIR to clarify or amplify its text in response to comments. Such changes are insignificant as the term is used in Section 15088.5(b) of the State CEQA *Guidelines.*

The following text changes are made to the Draft Environmental Impact Report (DEIR). The changes are grouped by DEIR chapters and are then shown by page number in the DEIR and identified as to the location of the change in the body of the text or table.

Where changes are shown inserted in the existing DEIR text, revised or new language is underlined, deleted language is indicated by ~~strikethrough~~, and the original text is shown without underline or strikethrough. Where not ambiguous, new or replacement text is shown without markings.

B. CHANGES TO DEIR CHAPTER 1, INTRODUCTION

Page ***Identification*** **/ Text Change:**

1-2 *The second sentence of the fourth full paragraph on page 1-2 is changed to read:*

> **Table 1-1** provides a chronological summary of the studies that were conducted by independent consultants under contract to the CPUC in support of the environmental analysis for A.99-05-029; the results of which were used to evaluate potential environmental impacts in this Draft EIR.

1-2 *The following text is added to the bottom of DEIR page I-2 under Section 1.3*:

> …this EIR identifies potential impacts that could occur and provides recommended mitigation measures that could and should be applied to other responsible agencies during subsequent environmental review and approval processes for specific future project on the lots proposed for sale as they occur. In a motion filed by Paragon Communities, Inc. on June 29, 2004, Paragon has agreed to incorporate all of the mitigation measures recommended in the DEIR that are pertinent to lots 14 through 17 in Cluster 7 and lots 22 through 25 in Cluster 8, into the project plans for any future development of those lots. However, it will be under the jurisdiction of

other agencies to adopt, implement, and enforce any mitigation measures ultimately imposed on potential development projects on the lots in question.

C. CHANGES TO DEIR CHAPTER 2, SUMMARY

Page ***Identification*** **/ Text Change:**

2-7 *Recommended Mitigation Measure D.1a is added before Recommended Mitigation Measure D.1 and Recommended Mitigation Measure D.1 is changed to Recommended Mitigation Measure D.1b in the Mitigation Measures column for Impact D.1 on DEIR page 4.D-9 as follows:*

D.1a: Future developers of the lots shall retain a qualified archaeologist to conduct monitoring during ground-disturbing activity in the lots proposed for sale. The archaeologist shall meet the Secretary of the Interior's professional standards (36 CFR Part 61) for archaeology. In addition, in consultation with the Native American Heritage Commission, future developers shall appoint a Native American representative to monitor the ground disturbing activity. Both the on-site archaeologist and the Native American monitor shall determine, based on relevant information in the field (e.g. culturally sterile soils or fill material), whether full-time monitoring is required or necessary after initial ground disturbance is conducted. If cultural resources, *such as chipped or ground stone, large quantities of shell, historic debris, building foundations, or human bone*, are inadvertently discovered during ground disturbing activities, no further construction shall be permitted within 50 feet of the find and an avoidance, evaluation, or mitigation plan shall be formulated by the on-site archaeologist and in consultation with the Native American monitor before construction can continue.

D.1b: …

2-12 *The text of the Mitigation Measures and Level of Significance after Mitigation columns for Impact F.1 on DEIR page 2-12 is changed to read:*

Mitigation Measures

~~**Mitigation:** None required. Los Angeles City Building Code requires additional mitigation for methane and other gases be implemented when construction occurs at these sites. These additional measures include the installation of membrane barriers and vent piping as well as trench dams and electrical seal offs for each of these properties. Since these measures are already required by regulation, they are not mitigation measures according to CEQA, and the public health impacts at these clusters would be less than significant.~~

Recommended Mitigation Measure F.1: If contaminated soils are encountered during future site construction activities, the future developer shall seek regulatory oversight either from the Department of Toxic

Substances Control or the LARWQCB through their voluntary clean-up programs.

Level of Significance after Mitigation

Less than significant. Los Angeles City Building Code requires additional mitigation for methane and other gases be implemented when construction occurs at these sites. These additional measures include the installation of membrane barriers and vent piping as well as trench dams and electrical seal offs for each of these properties. Since these measures are already required by regulation, they are not mitigation measures according to CEQA

D. CHANGES TO DEIR CHAPTER 3, PROJECT DESCRIPTION

Page ***Identification*** **/ Text Change:**

3-1 *The following text is added to DEIR page 3-1 after the second sentence of third paragraph:*

All of the 36 lots proposed for sale in Playa del Rey and Marina del Rey are located within the City of Los Angeles.

E. CHANGES TO DEIR CHAPTER 4.A, APPROACH TO ANALYSIS

Page ***Identification*** **/ Text Change:**

4.A-1 *The fourth line of the second full paragraph on page 4.A-2 is changed to read:*

Table 4.A-1 provides a chronological summary of the studies that were conducted by independent consultants under contract to the CPUC in support of the environmental analysis for A.99-05-029; the results of which were used to evaluate potential environmental impacts in this Draft EIR.

4.A-3 *Table 1-1 on DEIR page 4.A-3 is changed to read:*

Table 1-14.A-1

F. CHANGES TO DEIR CHAPTER 4.D, CULTURAL RESOURCES

Page ***Identification*** **/ Text Change:**

4.D-5 *The text of DEIR page 4.D-5 is revised as follows:*

Twenty-eight archaeological sites have been recorded within a one-mile radius of the project area 34 Playa del Rey lots. Of these, 23 are prehistoric archaeological sites and six are historic archaeological sites. One of these sites is listed as a City of Los Angeles Historic-Cultural Monument No. 490, CA-LAN-47. It is

designated as the Gabrielino village of *Sa-Angna*, placing it approximately one-mile from the project area.

Six prehistoric sites are located within the boundaries of the PDR portion of the project area: CA-LAN-63, CA-LAN-64, CA-LAN-65, CA-LAN-203, CA-LAN-204, and CA-LAN-206. These sites are summarized below in **Table 4.D-1**. All six sites are situated in the northern half of this portion of the project area, between Gulana Avenue on the west and Hastings Avenue on the east, placing some of these known site locations within a quarter-mile of the 36 lots proposed for sale. CA-LAN-63 and LAN-64 were identified approximately 1/2 mile east of the lots. The locations of the 36 lots were compared with the mapped locations of these prehistoric sites, and none of the parcels are within the boundaries of the prehistoric sites. None of the known sites were identified within the footprints of the lots.

Many of the sites listed, LAN-63, 64, and 206, have been extensively investigated (Van Horn, 1987 and Altschul, 1997). On the basis of CEQA criteria (see below), CA-LAN-206 was found to be too degraded to be considered an important cultural resource. LAN-63 and 64 were found to meet the CEQA criteria and were scientifically investigated to a level that reduced adverse effects of the proposed West Bluffs development (Planning Consultants Research, 1998). Given this information and the distance of these sites to the Playa del Rey lots (at approximately 1/2 mile from the recorded boundaries of LAN-63 and 64), further impacts to these sites is not anticipated. Although the locations given for sites CA-LAN-65, 203, and 204 do not correspond to the lot footprints, they were recorded with ambiguous or uncertain information regarding their exact location; however, the sites were small and have been likely destroyed due to development and natural erosion since their original recordation.

The Westchester Bluffs, which overlook the Ballona Creek drainage to the north, would have served as an optimal location for exploiting Ballona Creek wetland resources. However, these sites have been largely destroyed as a result of bluff erosion and housing development. Thus, the sale and future development of these parcels would not result in adverse impacts on any of these known resources. However, previously unrecorded subsurface archaeological resources could be present within the individual parcels.

4.D-6 *The last portion of the first paragraph on DEIR page 4.D-6 is modified to read:*

One response was received from Samuel Dunlap, a representative of the Gabrielino Indians Tribal Council, who recommended that monitoring be conducted during ground disturbance of the lots. Further, a comment was received from the Gabrielino/ Tongva Tribe requesting that the lots be donated for preservation and be kept in trust by the tribal council. Further consultation between the lead agency and the Gabrielino/ Tongva Tribe is recommended. ~~No~~

~~responses have been received as of the writing of this document. If, as planning proceeds, further information or concerns relevant to the project are presented from a NAHC contact, further consultation between the lead agency and the contact is recommended.~~

4.D-9 *Recommended Mitigation Measure D.1a is added before Recommended Mitigation Measure D.1 and Recommended Mitigation Measure D.1 is changed to Recommended Mitigation Measure D.1b on DEIR page 4.D-9 as follows:*

Recommended Mitigation Measure D.1a: Future developers of the lots shall retain a qualified archaeologist to conduct monitoring during ground-disturbing activity in the lots proposed for sale. The archaeologist shall meet the Secretary of the Interior's professional standards (36 CFR Part 61) for archaeology. In addition, in consultation with the Native American Heritage Commission, future developers shall appoint a Native American representative to monitor the ground disturbing activity. Both the on-site archaeologist and the Native American monitor shall determine, based on relevant information in the field (e.g. culturally sterile soils or fill material), whether full-time monitoring is required or necessary after initial ground disturbance is conducted. If cultural resources, *such as chipped or ground stone, large quantities of shell, historic debris, building foundations, or human bone*, are inadvertently discovered during ground disturbing activities, no further construction shall be permitted within 50 feet of the find and an avoidance, evaluation, or mitigation plan shall be formulated by the on-site archaeologist and in consultation with the Native American monitor before construction can continue.

Recommended Mitigation Measure D.1b: …

4.D-10 *The first paragraph of Impact D.1 on DEIR page 4.D-10 is revised as follows:*

Although the present survey and previously conducted surveys did not reveal new cultural resources at the proposed lots, these surveys may not conclusively demonstrate the nonexistence of subsurface cultural resources on the project site. Traditional foot survey methods are constrained due to variation in the natural landscape, such as grass cover and grazing that can obscure surface evidence. Moreover, the Westchester bluffs and the surrounding area have experienced a long period of human occupation and landscape change. The proximity of a number of previously recorded archaeological sites, e.g. CA-LAN-63, 64, 203, 204, and 206, also lends to the area's importance prehistorically. In addition, Native American representatives have indicated that the bluff area was a prominent village site called *Sa'anga.* Significant artifactual, ecofactual (i.e., plant and animal remains), and geofactual (i.e., soils, sediments, and minerals) evidence of this occupation may be revealed whenever subsurface activity takes place. If historical resources, unique archaeological resources, or traditional cultural properties do exist on the project

site, grading and other construction-related activities could cause significant impacts to the scientific value of those resources.

G. CHANGES TO DEIR CHAPTER 4.E, GEOLOGY AND SOILS

Page ***Identification*** **/ Text Change:**

4.E-15 *The first full paragraph on DEIR page 4.E-15 is changed to read:*

Brown and Caldwell conducted soil gas surveys and subsurface exploration studies to support the analysis for this EIR (Brown and Caldwell, 2004). Results of Brown and Caldwell's recent soil gas sampling verify the absence of processed natural gas ~~soil gas~~ in the shallow soils on the project parcels indicating that there is no leakage occurring from the project site well casings and surrounding geology. Methane was detected in soil gas samples at Cluster 11 and one sample at Cluster 12 (see page 4.G-3 for a full description of these samples). As discussed above, the migration of gas to the surface would only be an impact if that gas represented an adverse health hazard to the public on the associated lots. (Refer to Section 4.F, Public Health and Section 4.G, Public Safety for additional discussion and analysis on human health and safety impacts associated with exposure to subsurface gas sources.)

H. CHANGES TO DEIR CHAPTER 4.F, PUBLIC HEALTH

Page ***Identification*** **/ Text Change:**

4.F-1 *The third and fourth paragraphs of DEIR page 4.F-1 are modified as follows:*

TYPES OF GASES

There are three types of gas that may exist within the geological and soil units underlying the project area: biogenic (sometimes called bacterial or swamp) gas, thermogenic (field) gas, and processed natural gas (also called storage gas or piped gas). Biogenic gas is primarily methane with carbon dioxide and sulfide gases formed in shallow depths and low temperatures that result from anaerobic bacterial decomposition of organic material in former lagoon deposits or other sources. Biogenic gas contains mostly methane and carbon dioxide with smaller amounts of ethane, propane, and butane. These biogenic gases are not toxic at low (ppm) levels; however, they act as asphyxiants at high concentrations. ~~Biogenic gases contain trace quantities of other chemicals which are toxic at low levels (in the ppm range), including benzene, toluene, ethyl benzene, and xylene (BTEX). These (BTEX) are addressed in the human health risk assessment (HHRA) that was conducted for this project (see Appendix E).~~ Methane and other asphyxiants are considered in Section 4.G, *Public Safety*. If there is sulfur present in the

decomposing organic matter, these gases may also contain trace quantities of hydrogen sulfide.

Thermogenic gas is generated at great depth when increased temperatures and pressures alter organic material. ~~Similar to biogenic gas,~~ Thermogenic gas contains a broad range of gas components including methane, ethane, propane, and butane, as well as trace amounts of toxic gases, including hydrogen sulfide. Unlike biogenic gases, thermogenic gases contain trace quantities of other chemicals which are toxic at low levels (in the ppm range), including benzene, toluene, ethyl benzene, and xylene (BTEX). These (BTEX) are addressed in the human health risk assessment (HHRA) that was conducted for this project (see Appendix E). The HHRA addresses the trace toxic gases, and Section 4.G, *Public Safety,* deals with the other gases which act as asphyxiants or present safety risks (explosion or fire).

4.F-4 *The third full paragraph of DEIR page 4.F-4 is changed to read:*

SCG, or its successor in interest ~~owns most mineral rights in the PDR gas storage field and~~ is ~~therefore~~ responsible for any gas leaks or damage originating from gas storage operations at the PDR Gas Storage Facility (both aboveground facility and associated operating wells)~~from thermogenic sources~~. ~~California Public Resources Code, Section 3251.5 states that if an abandoned well leaks and requires remedial work 15 or more years after it was properly abandoned according to all requirements at the time of abandonment, the state must assume financial responsibility for the remedial work.~~ Financial responsibility for the wells relevant to the proposed sale would transfer to the State 15 years after the well was properly abandoned only if the leak was unrelated to gas storage operations. SCG, or any successor in interest, would continue to have liability for any well leak that could be shown to be related to storage operations.

4.F-5 *The description of the Troxel 1 gas leak on Table 4.F-1 of DEIR pages 4.F-5 is modified as follows:*

Troxel 1	**Native (Marsh) Gas Bubbles**	**<1000**	**1994**	**Union Jack Street and between Speedway Avenue and Venice Beach**

4.F-5 *Table 4.F-1 is amended to include the following note:*

Note: All gas well leaks described in this table were detected through SCG's routine monitoring program; these leaks were repaired after their discovery.

4.F-6 *The text of DEIR page 4.F-6 is changed to read:*

There were 21 groundwater samples taken from five wells at Cluster 12. BTEX and/or TPH were detected in most of the samples. The results of the sampling are given in Table 5 of Appendix A of the Human Health Risk Assessment conducted by Brown and Caldwell (see Appendix ~~D~~E). Table 5 shows that the measured levels of all of the BTEX species are well below California action levels for drinking water standards, except for benzene (see Appendix ~~D~~E). Four of the 21 samples of benzene were slightly above the action level, and the other 17 samples were below the detection limit. However, these action levels are established for drinking water, and the groundwater at Cluster 12 is brackish that is heavily influenced by the tides and cannot be used for human consumption. Thus, there are no health risks to humans from these measured benzene levels in the groundwater.

4.F-12 *The following recommended mitigation measure and revised text is added under Impact F.1 on DEIR page 4.F-12:*

~~**Mitigation:** None required. Los Angeles City Building Code requires additional mitigation for methane and other gases be implemented when construction occurs at these sites. These additional measures include the installation of membrane barriers and vent piping as well as trench dams and electrical seal offs for each of these properties. Since these measures are already required by regulation, they are not mitigation measures according to CEQA, and the public health impacts at these clusters would be less than significant.~~

Recommended Mitigation Measure F.1: If contaminated soils are encountered during future site construction activities, the future developer shall seek regulatory oversight either from the Department of Toxic Substances Control or the LARWQCB through their voluntary clean-up programs.

Significance after Recommended Mitigation: Less than significant. Los Angeles City Building Code requires additional mitigation for methane and other gases be implemented when construction occurs at these sites. These additional measures include the installation of membrane barriers and vent piping as well as trench dams and electrical seal offs for each of these properties. Since these measures are already required by regulation, they are not mitigation measures according to CEQA

I. CHANGES TO DEIR CHAPTER 4.G, PUBLIC SAFETY

Page ***Identification*** **/ Text Change:**

4.G-2 T*he description of the Troxel 1 gas leak on Table 4.G-1 of DEIR pages 4.G-2 is modified as follows:*

Troxel 1	**Native (Marsh) Gas Bubbles**	**<1000**	**1994**	**Union Jack Street and between Speedway Avenue and Venice Beach**

4.G-2 *Table 4.G-1 is amended to include the following note:*

Note: All gas well leaks described in this table were detected through SCG's routine monitoring program; these leaks were repaired after their discovery.

4.G-3 *The fourth paragraph on DEIR page 4.G-3 is changed to read:*

A helium sample was taken from Cluster 11 for laboratory analyses to determine the signature of the observed methane. To determine the methane signature (i.e., is it biogenic, thermogenic, or storage gas), an isotope analysis of the helium sample was carried out ~~to determine the origin of the gas (i.e., is it biogenic, thermogenic, or storage gas)~~. The ratio of the two stable isotopes of helium are He^3 (atomic weight three) and He^4 (atomic weight four) (He^3 / He^4) ~~and the ratios~~ in the helium sample were used to ~~of these isotopes in the measurements would~~ confirm the source of the detected gas, since methane ~~gases of~~ from different origins have distinct isotopic helium "signature" ratios. The helium isotope analysis confirmed that the origin of the gas found at the Cluster 11 was not the same as storage gas, but more likely is a residual gas that is present naturally (mostly thermogenic) from the decomposition of contaminated soils from historical oil exploration activities (Methane Specialists, 2004).

4.G-5 *To clarify DOGGR policy, the second full paragraph on DEIR page 4.G-5 is changed to read:*

DOGGR has adopted regulations for well abandonment to ensure that it is done safely and effectively. These regulations provide well abandonment procedures that ensure abandoned wells are leak-free at the time of abandonment and require gas field operators, while the gas field is in operation, to monitor and maintain abandoned wells to prevent future migration of oil or gas from the producing zone and the upper zones, as well as protect groundwater. Furthermore, DOGGR is charged with ensuring public safety. DOGGR has the expertise and authority to require whatever steps are deemed necessary to protect public safety. Well abandonment is discussed in more detail in Section 4.E, *Geology and Soils*.

J. CHANGES TO DEIR CHAPTER 5, ALTERNATIVES ANALYSIS

Page ***Identification*** **/ Text Change:**

5-5 *The text of Alternatives 2 and 3 on DEIR page 5-5 is revised as follows:*

Similar to the proposed sale, Alternative 2, Exclusion of Cluster 9 would avoid potential impacts to the monarch butterfly in Cluster 9. Mitigation measures proposed for the project could mitigate these potential impacts to globose dune beetle habitat. While the potential for trespass or other unauthorized use may exist at Cluster 9, impacts to biological resources under Alternative 2 would still be less than under the proposed sale because ~~monarch butterfly habitat would remain undisturbed~~ future development construction activities would not occur, and thus, it is likely the monarch butterfly would be less impacted.

…

Similar to the proposed sale, Alternative 3, Exclusion of Cluster 12 from the proposed sale, would result in potential disturbance to the monarch butterfly because this option would include the sale and development of Cluster 9. However, this alternative would avoid potential impacts to the globose dune beetle in Cluster 12. Mitigation measures proposed for the project could mitigate these potential impacts to the monarch butterfly. While the potential for trespass or other unauthorized use may exist at Cluster 12, impacts to biological resources under Alternative 3 would still be less than under the proposed sale because the globose dune beetle habitat would ~~remain undisturbed~~ not be eliminated by future development.

K. CHANGES TO DEIR APPENDIX A

Page ***Identification*** **/ Text Change:**

Appendix A
Page H-5, H-6 *Upon reviewing the zoning designations for the 36 project lots, the following revisions will be made to the text of pages H-5 and H-6 of DEIR Appendix A:*

Thirty-five of the 36 lots proposed for sale are zoned for residential use. The lots are clustered into 12 groups, as many of the lots are contiguous as shown on Figure 3 and Figure 4 in the Project Description. Table H-1 shows zoning, assessor parcel numbers (APN), nearest addresses, and specific plans for each cluster of lots. Of the 33 residentially-zoned lots located in Playa del Rey (PDR), 30 lots are zoned R1-1, Low Density Residential in an established area for single-family residential neighborhoods. Three of the lots are zoned R3-1, Medium Density Residential. One lot proposed for sale is zoned ~~CR-1~~C1.5, Limited Commercial. This lot is located in Playa del Rey, south of Manchester Avenue on Saran Drive. The lot is located in a transition area where surrounding properties are zoned for Residential and Commercial uses (Los Angeles County, 1984). The two-residentially zoned lots located in Marina del Rey (MDR) are zoned R3-1, Medium Density Residential ~~multi-family residential~~.

The R1 zone is a single-family residential zone. Permitted uses include single-family dwellings, government-owned parks, playgrounds, community centers, and permitted accessory uses. The R1 zone allows 3 to 7 dwelling units per gross acre.

TABLE H-1
ZONING AND SPECIFIC PLAN DESIGNATION

Well #	Lots	Well Name	Nearest Address	APN	Zoning	Specific Plan
1	3	Merrill 1	7851 West Manchester Avenue	4115024805	R3-1	LACTC[a]
2	5	13-1	7912 West 83rd Street	4115024805	R1-1	LACTC
3	8	23-1	7966 West 79th Street	4115028806	R1-1	LACTC
4	2	Joyce 1	7737 West 82nd Street	4114022800	R1-1	LACTC
5	3	Lormar-1	7726 West 83rd Street	4114023801	R1-1	LACTC
6	1	Anglo American	7565 81st Street	4114019801	R1-1	LACTC
7	2	O and M 1	7714 West 83rd Street	4114023800	R1-1	LACTC
8	4	Samarkand 1	8244 West 83rd Street	4115012800	R1-1	LACTC
9	3	29-2	8219 Falmouth Avenue	4115014800	R1-1	LACTC
10	2	29-1	8103 Falmouth Avenue	4115014801	R1-1	LACTC & CB[b]
11	1	Hisey-1	8600 South Saran Drive	4119001800	~~CR-1~~C1.5	LACTC
12	2	Troxel 1	5107 Ocean Front Walk, MDR	4294006019	R3-1	LACTC

[a] LACTC: Los Angeles Coastal Transportation Corridor Element;
[b] CB: Coastal Bluffs Element

SOURCE: Chambers Group (2000); Environmental Science Associates (2004)

The R3 zone is a multiple dwelling zone. Permitted uses include single-family dwellings, two-family dwellings, group dwellings, multiple dwellings, or apartment houses. R3-1 Medium Density Residential allows 24-40 dwelling units per gross acre.

The ~~CR~~C1.5 zone is a limited commercial zone. Permitted uses include but are not limited to ~~churches,~~ government-owned parks, public parking areas, any single- or two-family dwellings, apartment houses, mini-shopping centers, restaurants, and uses wholly conducted within an enclosed building such as a hotel, bank, or office. ~~There is a six-story height limit in the CR zone. In addition, no merchandise is to be displayed, sold, or serviced and all activities are to be conducted wholly within an enclosed building.~~

L. CHANGES TO DEIR APPENDIX E

Page ***Identification*** **/ Text Change:**

Appendix E Page 2 The last paragraph on page 2 of DEIR Appendix E is changed to read:

Methane and **hydrogen sulfide** are two gases that are included in investigations conducted by other members of the ESA team that are not included in the human health risk assessment. ~~**Methane** and **hydrogen sulfide** are two gases that were sampled for in the investigations but not included in this human health risk assessment.~~ Both of these gases are evaluated in separate reports. In the case of hydrogen sulfide, measurements taken of hydrogen sulfide in the air at each parcel did not find concentrations above levels of concern. The 315 measurements were taken at two different heights; 203 measurements immediately above ground surface and 112 measurements at 4 to 6 feet to represent a breathing zone. The concentrations of hydrogen sulfide measured in these samples were compared to California Reference Exposure Levels of 0.03 ppm for acute exposure (1 hour) and long term chronic exposure of 0.007 ppm. None of the samples at ground level exceeded either standard. At breathing zone level, 2 samples exceeded the level of 0.007 and 0.03 ppm for acute effects. However, additional samples were taken immediately following these detections and concentrations dropped to at or below 0.003 ppm within a short time (less than 15 minutes). Also, because these concentrations were not detected at ground surface, it is likely that the source of the hydrogen sulfide is not emissions from the parcels. At this time, there is no evidence that hydrogen sulfide in outdoor air is elevated due to releases from the vapors at the property clusters. ~~And~~ Therefore, hydrogen sulfide was not included in the risk assessment. Methane is not included in this risk assessment because the primary effects are as an asphyxiant (replaces oxygen) and explosive at high concentrations. A separate evaluation was conducted to evaluate the risks associated with high concentrations of methane. Methane was not included in this risk assessment for lifetime exposure because concentrations below the levels of concern as an asphyxiant or explosive are not known to have long term health effects.

Appendix E Page 8 *The last paragraph on page 8 of DEIR Appendix E is changed to read:*

In the case of hydrogen sulfide, measurements taken of hydrogen sulfide in the air at each parcel did not find concentrations above levels of concern. The 315 measurements were taken at two different heights, 203 measurements immediately above ground surface and 112 measurements at 4 to 6 feet to represent a breathing zone. The concentrations of hydrogen sulfide measured in these samples were compared to California Reference Exposure Levels of 0.03 ppm for acute exposure (1 hour) and long term chronic exposure of 0.007 ppm. None of the samples at ground level exceeded either standard. At breathing zone level, 2 samples

exceeded the level of 0.007 and 0.03 ppm for acute effects. However, additional samples were taken immediately following these detections and concentrations dropped to at or below 0.003 ppm within a short time (less than 15 minutes). Also, because these concentrations were not detected at ground surface, it is likely that the source of the hydrogen sulfide is not emissions from the parcels. Therefore, ~~H~~hydrogen sulfide was not included in the risk assessment because there is no evidence that hydrogen sulfide in outdoor air is elevated due to releases from the vapors at the lots. This evidence is documented in a report by Gary Boettcher (Methane Specialists and Sullivan Consulting, 2003~~4~~).