



Department of Toxic Substances Control



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Secretary for
Environmental Protection

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Governor

January 19, 2018

RESPONSIVENESS SUMMARY FOR THE LADERA LINDA SITE, 32201 FORRESTAL DRIVE,
RANCHO PALOS VERDES, CALIFORNIA 90275 (SITE CODE: 401759-00)

Dear Interested Parties:

The Department of Toxic Substances Control has completed its evaluation of all public comments received during the public comment period for the Preliminary Endangerment Assessment (PEA) for the Ladera Linda Site, located at 32201 Forrestal Drive, Rancho Palos Verdes, California (Site).

A 30-day public comment period for the PEA Report was held from November 9, 2017 through December 8, 2017, and a community meeting was held on November 16, 2017. In addition, late comments were accepted through December 15, 2017. DTSC has carefully evaluated all comments received during this period and has prepared responses to all comments received (see attached).

Based on the evaluation of the PEA report and consideration of the public comments, DTSC has determined that the Site does not pose a significant risk to human health and the environment under any land use. DTSC approved the PEA subject to changes discussed below, and determined that no further action is required with respect to additional investigation or remediation of hazardous substances at the Site.

After careful evaluation of all the information available to DTSC and consideration of all public comments received during the public comment period, DTSC required some corrections to the PEA Report. These corrections are identified in DTSC's ERRATA Sheet for the PEA, which is attached to this Responsiveness Summary.

For further information regarding the Site, please click the link below:

http://www.envirostor.dtsc.ca.gov/public/profile_report?global_id=60002419

If you have any questions please contact me at (714) 484-5459 or by email at Peter.Garcia@dtsc.ca.gov, or Chia Rin Yen, Project Manager, at (714) 484-5417 or by email at ChiaRin.Yen@dtsc.ca.gov.

Sincerely,

Peter A. Garcia
Branch Chief
Brownfields and Environmental Restoration Program

Attachment(s)

**RESPONSIVENESS SUMMARY FOR THE PRELIMINARY ENDANGERMENT
REPORT
LADERA LINDA SITE
32201 FORESTAL DRIVE
RANCHO PALOS VERDES, CALIFORNIA 90275**

I. INTRODUCTION/PURPOSE

The Department of Toxic Substances Control (DTSC) began investigation of possible contamination at the Ladera Linda Site in April 2016, in response to community concerns. The Ladera Linda Site is located at 32201 Forrestal Drive, in Rancho Palos Verdes. DTSC's investigation determined that fill material used on the terrace adjacent to the soccer fields may have contained fragments of asbestos-containing material. The source of the fill material and whether its use constitutes a violation of California's Hazardous Waste Control Law (HWCL) are the subject of a separate investigation and are not part of this review or action.

In its initial investigation of the Ladera Linda Site, the soil was tested for a wide range of potential contaminants, including hazardous organochlorine pesticides, metals, total petroleum hydrocarbons, benzene, and hexavalent chromium, as well as asbestos-containing material. Because most soils in urban, suburban and agricultural areas in California contain low levels of many chemicals, the test results were compared with health-protective screening levels used by DTSC and the U.S. Environmental Protection Agency (US EPA). These screening levels are protective of the highest likely exposure levels for adults and children who may come into contact with the soil at the Site. DTSC's analysis showed that asbestos-containing material was the only contaminant that could pose a potential health risk.

DTSC required the parties responsible for the site, the Palos Verdes Peninsula Unified School District (PVUSD) and the Palos Verdes American Youth Soccer Association (PV AYSO), to prepare a preliminary assessment of potential asbestos contamination at the site. Under California law, a Preliminary Endangerment Assessment (PEA) is required to determine whether contamination is present and, if so, whether the type, amount, and potential for exposure presents a danger to the public. The PEA for the Ladera Linda Site describes the testing done to identify and quantify contamination present at the site, and the analysis of whether the contaminants found present a danger to the public. The PEA concludes that the fill material at the Ladera Linda Site does not pose a danger to human health, including the health of children or other sensitive individuals playing on or using the site.

Although California law does not require public review of PEA reports for sites that based on the result of testing and sampling do not require any further action, DTSC provided the draft PEA for public review and comment for thirty days prior to making its

decision on the draft report. DTSC also prepared a Community Update summarizing the Site, the PEA, the opportunities for public participation in DTSC's review, and where to find additional information about the review, including staff to contact at DTSC with questions. The Community Update was mailed to residents within a quarter mile radius of the site, interested parties on a Site-specific mailing list, and elected officials in Palos Verdes and Rancho Palos Verdes. The Community Update and other project documents were also made available at the Palos Verdes Library District – Peninsula Center Public Library Branch, at DTSC's office in Cypress, California, and posted online on DTSC's EnviroStor at:

http://www.envirostor.dtsc.ca.gov/public/profile_report?global_id=60002419. DTSC also held a community meeting on November 16, 2017. In recognition of the State of Emergency declared by Governor Brown for Southern California Wildfires, DTSC notified the public that comments would be accepted for an additional week after the close of the public comment period.

DTSC received comments from 108 individuals and organizations. All comments were carefully considered as part of DTSC's review of the draft PEA. This Responsiveness Summary discusses the comments received in six (6) categories and provides General Responses for each category. These General Responses address questions and concerns received about project scope, public participation, human health screening evaluation, ecological screening evaluation, the investigation conducted by Health Sciences Associates, and requests received for an extension of the public comment period. DTSC has also prepared individual responses to each comment received by the Department on or before December 15, 2017.

After careful evaluation of all the information available to DTSC and consideration of all public comments received during the public comment period, DTSC has determined to approve the PEA, subject to some corrections to the PEA Report as identified in Response to Comments 8.11 and 11.2 below, as well as DTSC's ERRATA Sheet for the PEA. A copy of DTSC's approval letter can be accessed in the Activities tab at this link https://www.envirostor.dtsc.ca.gov/public/profile_report.asp?global_id=60002419.

II. DTSC'S GENERAL RESPONSES

DTSC's general responses are listed below.

1. Project Scope

DTSC received several comments that are not relevant to the PEA project. These comments include verifying the origin and quantity of the imported soil, number of trucks used for importing soil to the Site, and compliance with the Los Angeles Unified School District policies. The scope of the project subject to public review and DTSC's role in the project is described below.

On October 14, 2016, DTSC entered into a consent agreement (Consent Agreement) with Palos Verdes Peninsula Unified School District (PVPUSD) and Palos Verdes American Youth Soccer Association (PV AYSO). The Consent Agreement requires PVPUSD and PV AYSO to investigate, characterize, and remediate the releases or threatened releases of any hazardous substances at or from the site under the DTSC's oversight.

Based on the data and pursuant to the Consent Agreement, DTSC required that a Preliminary Endangerment Assessment (PEA) be conducted to determine whether a release or threatened release of hazardous substances exist at the Site that pose a threat to human health or the environment. The PEA is intended to be the initial investigation for the Site to estimate the potential risk to public health and the environment, determine if further action (further investigation or remediation) is needed for the Site.

DTSC evaluated the Initial Data Submission and associated documents and determined that additional investigation, in the form of a PEA, is required to determine whether a release or threatened release of asbestos exists at the Site that poses a threat to public health or the environment.

2. Public Participation

Some commenters raised concerns about public participation efforts and requested DTSC explain what was done to include the community and incorporate public participation efforts to the Ladera Linda project.

DTSC Public Participation for the Ladera Linda Site began in October 2016 when a Community Update was sent to inform the community and stakeholders that the DTSC had entered into a Consent Agreement with PVPUSD and PV AYSO to investigate, characterize, and/or remediate a release or threatened release of hazardous substances at or from the Site under the oversight of DTSC. The October 2016 Community Update also provided a link to the DTSC website to access the project documents. DTSC has continued to post project related documents on the provided website to update the project status with the most recent posting occurring on November 7, 2017.

As part of our Community Outreach, DTSC contacted a variety of elected officials and public members for interviews to gain a comprehensive understanding of issues, concerns or interests relative to the Site. Comments or concerns received by DTSC during this process have been carefully evaluated and are included in a Community Profile (https://www.envirostor.dtsc.ca.gov/public/deliverable_documents/7561492741/01_18_17%20Ladera%20Linda%20Community%20Profile%20FINAL_Redacted.pdf) prepared for the project. The Community Profile also includes Public Participation activities planned for the Site.

In May 2017, DTSC sent a Community Survey to the Ladera Linda Site Mailing List, DTSC Notification List, and the Ladera Linda Key Contact List. The Community Survey again sought to ascertain the level of interest in the Site, specific concerns, questions, and general information available, and knowledge regarding the PEA. The Community Survey was sent along with a Work Notice also in May 2017 to inform the community of the upcoming investigation activities at the Site.

DTSC's Public Participation Specialist compiled and evaluated survey responses and comments and recommended additional community outreach activities for the PEA Report. These community outreach activities, though not statutorily mandated, were included in the community outreach and public participation goals and activities for the Ladera Linda Site and are described in Section 9.0 of the PEA Report.

In November 2017, DTSC sent a second Community Update inviting the community to comment on the findings of the PEA Report and provided a 30-day public review and comment period. Additionally, a Community Meeting was held on November 16, 2017 to present and explain the findings of the recent PEA and to answer questions specific to the PEA and the results. Although neither the 30-day public review or the community meeting during the comment period were required for PEA that concluded no further action was required, DTSC decided to hold them due to the community interest in this project. At the Community Meeting copies of the Community Profile, previous Community Updates, and Community Survey results were available for review by attendees.

Prior to sending the November 2017 Community Update to the public, DTSC coordinated with several entities to schedule a community meeting location. This included but was not limited to the following:

- DTSC contacted the City of Rancho Palos Verdes and requested that it be included on the City Council meeting agenda during the period of PEA review. in December. The City Council and its scheduling unit could not accommodate this request.
- DTSC contacted the Ladera Linda Community Center, which was a preferred meeting location expressed by the community (as ascertained from Community Survey responses and community engagement with individuals in the public sector, residents, and local businesses). However, the meeting room at the Ladera Linda Community Center was not available on November 16, 2017, and was further deemed unavailable for use due to ongoing plumbing issues and pending remodeling.

DTSC was able to secure space for a community meeting on November 16, 2017, at the Point Vicente Interpretive Center located at 31501 Palos Verdes

Drive West, Rancho Palos Verdes, California, a facility operated by the Recreation and Parks Department of Rancho Palos Verdes and located about 5 miles from the Ladera Linda Fields. Once the Community Meeting date and location were established, DTSC sent a Community Update inviting the public to review the PEA Report for the Site and to attend the Community Meeting.

In conclusion, DTSC has involved the community since the early stages of this project and consistently gathered, carefully considered, and evaluated concerns raised by the community. DTSC has provided an opportunity for more than 30-days of public review and a Community Meeting during the public comment period, although none was required for the PEA that concludes no further action was required. Staff have responded to emails, provided briefings to elected officials, spoken with community members via telephone and email as well as providing written materials, links to electronic data regarding the Site, and established repositories of information online, at the DTSC Cypress office, and at the local library to facilitate ease of access to information for residents. DTSC has carefully evaluated all concerns and comments received during the public comment and review period, which ended formally on December 8th, as well as late-filed comments received through December 15, 2017.

3. Human Health Screening Evaluation

Several Commenters raised concerns over the health and safety of children playing in the fields if the soil remained at the Ladera Linda site and asked what health protective or screening levels were used to make the no further action determination at the Site. Comments were made asking DTSC to explain what chemicals were detected and if remaining levels are safe for human health, particularly children playing in the park area.

Early Site investigations tested for organochlorine pesticides, metals, total petroleum hydrocarbons, benzene, and hexavalent chromium in soil, and encountered one piece of construction and demolition debris containing friable asbestos. Alta Environmental and Leymaster Environmental Consulting completed the testing.¹ In 2016, DTSC evaluated the data collected from these early investigations in accordance with DTSC's Human Health Risk Assessment (HHRA) Note 3 screening levels, and USEPA Regional Screening Levels (RSL)

¹ See Alta Environmental Report at http://www.envirostor.dtsc.ca.gov/public/deliverable_documents/6945434391/EXHIBIT%20B%20-%20ALTA_Soils_Report.pdf; Leymaster Environmental Consulting Report at http://www.envirostor.dtsc.ca.gov/public/deliverable_documents/6945434391/EXHIBIT%20C%20-%20LEYMASTER%20ENVIRONMENTAL%20CONSULTING%2C%20LLC%20%20Report.pdf. See also PV AYSO's Initial Data Submission at http://www.envirostor.dtsc.ca.gov/public/final_documents2?global_id=60002419&doc_id=60420213 and DTSC's subsequent determination that a PEA was required at http://www.envirostor.dtsc.ca.gov/public/deliverable_documents/6009458780/LaderaLindaSite_AdditionalInvestigation_Determination_11.18.16.pdf

for residential (unrestricted land use) scenarios. DTSC determined that the testing results, including all detected chemicals did not pose a significant risk to human health, and they required no further investigation or other action. There were also no changes to the screening levels for the chemicals of concern between 2016 and 2017. Asbestos was identified as the only constituent of concern that required further evaluation through a PEA investigation.

A Conceptual Site Model (CSM) was developed which identified the chemical of concern's (asbestos) potential exposure pathways, and receptors. The CSM was developed to aid in the evaluation of any potential risk to human health and the environment from asbestos at the Site. Youth soccer players, spectators and hikers were included for evaluation as potential receptors and the potential human health risk was identified. Potential exposure pathways included inhalation of any potential asbestos fibers present in air and storm water runoff, The CSM is included in the PEA Report, Section 5.1.

The PEA investigation did not find friable asbestos containing materials and did not detect asbestos fibers in soil or air samples. Based on further evaluation, DTSC determined that Site does not pose any potential risk to human health, including children.

4. Ecological Screening Evaluation

Comments were received about the ecological impacts the Site poses and asked DTSC if what was remaining at the Site was harmful to the plant and wildlife and sensitive species such as the Gnatcatcher would be impacted in the area.

The California Department of Fish and Wildlife California Natural Diversity Database (CNDDDB) was queried to identify documented occurrences of special-status plant and wildlife species and sensitive habitats within the Site vicinity. CNDDDB indicated that 47 special-status plant, wildlife, and natural communities have been recorded within five (5) miles of the Site. A nesting bird survey was also conducted at the Site for the PEA investigation, and no nesting bird activity was observed. Eight (8) bird species were observed in the vicinity. Species observed were: Allen's Hummingbird, Common Raven, Western Scrub jay, California towhee, California gnatcatcher, Lesser goldfinch and House finch.

Trees, shrubs, or other un-managed vegetation at the fringes of the field may only provide a very limited extent of nesting, cover, or foraging habitats for ecological receptors. In addition, any use of the limited habitat would likely be transient occurrences, given that these fringe areas are directly surrounded by roadways and other managed fields and there is a large expanse of Nature Preserve habitat just across the roadways.

After the plastic cover is removed, the Site would be maintained in its original form, and would not constitute valued wildlife “habitat” for ecological receptors given the surrounding recreational uses. Additionally, ecological receptors are more likely to habitat outside the site area due to its natural appeal of the surrounding habitat and proximity to the Nature Preserve area. Consequently, there are limited complete exposure pathways for ecological receptors to the Site-related chemicals but there are no expected significant adverse effects in ecological receptors.

In conclusion, although the limited information was presented in the PEA, based on the site conditions and the data collected, the Site would not pose a significant hazard to the ecological receptors.

5. Health Science Associates Investigation

Some commenters noted that initial environmental sampling investigations conducted by Health Sciences Associates used the professional services of an engineer whose license expired and questioned the validity of the sampling conducted.

Health Science Associates conducted air sampling and collected few pieces of construction and demolition debris at the Site. The investigation results were documented in a letter dated July 12, 2016. The letter was signed by Mr. Howard B. Spielman, an industrial hygienist certified by the American Board of Industrial Hygiene. Concerns were raised related to Mr. Spielman’s expired engineer’s licensure during this period.

The July 12, 2016 letter does not include any geologic or engineering plans, specifications, drawings, reports, or other engineering work. As a result, Mr. Spielman was not acting as an engineer or geologist but an industrial hygienist.

Mr. Spielman is a qualified person for such sampling because a registered professional engineer license is not required for air sampling and for construction and demolition debris sampling.

Therefore, DTSC could reasonably take into consideration the data presented in the Health Science Associates investigation along with all the other data, analysis, and evaluations contained in the Site file.

6. Public Comment Period and Late-Filed Comments

After DTSC provided the public a review of the PEA Report and DTSC’s Finding of Adequacy, some commenters requested that the thirty (30) day public comment and review period be extended and asked why DTSC did not provide added time for review.

Although DTSC does not ordinarily hold a public comment and review period for PEAs that conclude no further action is required, due to continuing public interest in the Site, DTSC decided to hold a 30-day public comment and review period for the PEA. As noted above, DTSC prepared and circulated a Community Update for its proposed action in early November that explained the public review and comment period would run from November 9 to December 8, 2017. DTSC further held a community meeting on November 16, 2017.

DTSC closed the public review period on December 8, 2017. DTSC did receive several requests to extend the public comment period by 30 to 90 days, but declined to do so based on the ample time (30 days) provided for public review and comment. Although DTSC declined to formally extend the public review period, DTSC did issue a public notice stating that it would evaluate and take into consideration all late-filed comments received by December 15, 2017.

The public notice was posted on DTSC's website, emailed to all commenters who emailed their comments to DTSC by December 8, 2017, and sent to DTSC's mailing list and key contacts listed in the Community Profile. The public notice was also emailed to the City of Rancho Palos Verdes.

III. RESPONSE TO COMMENTS

Below are DTSC's responses to each comment received

COMMENT 1 - JESSICA VLACO (November 7, 2017)

Comment 1.1. - I was just notified by the city of RPV that your review of the PEA is completed and a public meeting has been scheduled for Thursday November 16th at the PVIC. I have been inquiring about this matter for months and as recently as October 13th was told that I would be informed when the review was complete. Also, in previous email exchanges our neighborhood was told that the public meeting would take place at the Ladera Linda Community Center. This was to be done so as to accommodate those community members most impacted by the imported dirt. However, I see that, in addition to no one reaching out to me regarding the timing of your report or that a meeting was to be scheduled soon. You have also changed the proposed venue.

Can you please let me know why I was not notified sooner about this directly by someone at DTSC and also why the venue was changed?

Response: *DTSC will like to assure you that the public was informed as soon as DTSC completed its review of the PEA. DTSC completed its review of the PEA on November 3, 2017. Subsequently the Community Update was prepared and circulated on November 7, 2017. Thus, DTSC communicated with the public as soon as reasonably possible.*

The former Project Manager for this Site recently retired. Because of the transition to a new Project Manager, DTSC regretfully was not able maintain direct communication with every individual routinely. DTSC did send out notices to the Community including the City for communication with its residents. Nevertheless, DTSC was gratified to learn that you received notice via the City. DTSC strives to maintain cooperative relationships with local agencies, and keeps local agencies apprised of ongoing activities, in part to facilitate communication with the local community.

With regards to changing the venue, please see DTSC's General Response 2. DTSC responded to the commenter via email on November 7, 2017.

Comment 1.2 - Did you evaluate the testing protocols and procedures used by Alta Environmental and if so did you find any significant flaws in the tests that would cause you to not rely on them?

Response: *DTSC evaluated the Alta Environmental data and report prior to making its decision to require the additional PEA investigation. DTSC did not find any significant flaws, although DTSC did conclude the further investigation was warranted in the form of a PEA.*

DTSC carefully reviewed and approved a PEA workplan before the PEA study was commenced to assure that the study would provide DTSC with the information it needed to make a decision.

Comment 1.3 - If you were PVPUSD and you were presented with the finding in Alta Report, what action would you have taken? Would you have alerted the public and restricted access to the area while you conducted additional test as was recommended by Alta?

Response: *DTSC cannot answer assumptive questions on behalf of the PVPUSD. Please note that DTSC is asking public to provide comments on the PEA Report and its findings. Comments regarding the PVPUSD's action outside the context of the PEA is not within the scope of the project.*

Comment 1.4. - I am sure you have seen my numerous emails throughout this investigative process. I have communicated frequently with the various persons assigned to this matter.

Never have I expressed a desire to delay the process. On the contrary, I, and my fellow Ladera Linda residents, have been anxious to bring this matter to a close. We have been living under the shadow of this imported dirt since the 85 truckloads were dumped in our community in April of 2015. I want nothing more than to close this chapter and move on. We are only asking for a short delay so that we may have adequate time to read and digest the vast amounts of data that were presented to us in report 30 days ago. During this process, we have seen PVPUSD and AYSO been granted extensions

for filing the required documents or completing the trenching and testing. There have also been delays caused by incomplete or deficient report filings. There seemed to be no regard on their part for our desire to have the testing completed and results known. And your own organization took far longer than the projected 30-45 days after the tests were concluded to release the findings.

Now that the results have been made public we just ask to be allowed an additional period of time to review the data. The timing of this report comes when many of us are busy with family and outside activities because of holidays. Never before have we residents Ladera Linda- the community that was most impacted by this dirt- asked for any kind of accommodation. An extension of 30 days in order for us to adequately review the lengthy and detailed documents that comprise the PEA would be an appropriate gesture on your part. Our community has been almost totally left out of this process to date. We were not interviewed by anyone. We did not have an opportunity to have our voices heard until you released this report and gave us only 30 days to review and respond. We have literally waited for years to get to this point. For you and PVPUSD and AYSO to wait an additional 30 days to give us a voice in the process seems so minor compared to the time others have been afforded. I would also like to point out that the fall season for AYSO ends on December 9th when they host the King and Queen of the Hill soccer championships at the Ladera Linda fields. Since their season is over on that date, granting us an additional 30 days to comment on the report would not disrupt any of their activities.

I would also like to say that I am disappointed that despite my efforts to coordinate a community meeting with you and our neighborhood, I was ignored. We had suggested that the meeting take place at the Ladera Linda Community Center since we are the group most impacted and concerned about the dirt. We were told that this would happen. We were given a couple of estimates as to when that would happen. No one kept us informed about the status. Instead I had to continuously reach out to get updates. The last time I reached out I was told that things were being finalized and that you would be in touch with me soon. That never happened. The next time I heard anything from you was through our city staff. They sent out a mass email on November 7th informing everyone that the report was completed and that a community meeting was scheduled on November 16th at Point Vicente Interpretive Center and not the Ladera Linda Community Center as was previously agreed to. It certainly would have been nice and considerate if someone on staff at DTSC with whom I had been regularly communicating had contacted me directly. Again, we get the feeling that there really wasn't any desire to have us participate.

When I heard about the date and location of the meeting I sent yet another email to your staff inquiring about the location change and was told that the Community Center was not available on the date you wished to hold the meeting. At the actual meeting, we were given another explanation for the change in venue. To me, it seems like someone wanted to have the meeting at a location less convenient for most of the residents of Ladera Linda, many of whom are elderly.

Please give us a chance to have our voices heard in this process. So far that has not happened. I respectfully ask you to allow us another 30 days. I don't expect that any of my comments will alter the outcome of the test results. However, the entire document, including the historical information that is contained in the report concerning where the dirt came from, how much dirt was imported and what the prior test results showed, are all going to be a part of the permanent record of this investigation. I think it is imperative that those details are complete and factually correct too. Give us the time to ensure that this will happen.

Response: Please see DTSC's General Response 2 for an explanation as to why DTSC held the Community Meeting at Point Vicente Interpretive Center rather than other venues that may have previously been mentioned by the community or in discussions with the community.

Please see DTSC's General Response 6 for an explanation as to why DTSC provided a 30-day comment period but has considered late-filed comments received by December 15, 2017.

Comment 1.5 - You stated at the community meeting that the source of the dirt and quantity of the dirt are irrelevant to what your role was in this process. However, a great deal of the report was spent attempting to validate both of these items. No real evidence was presented to be able to conclude that the dirt was from one source other than interviews with unknown persons. The report uses that data to try and support the conclusion that 1300 cu yards of dirt could have come from that Torrance location. However, based on information that has been made public over the past year, that same home had been designed to have a terraced back yard and that the fill required for the terracing would have resulted in a net outflow of only 300 cu yards of dirt. That alternative proposition should also be discussed in the report if the report is to be believed as objective.

Response: The net outflow of 300 cubic yard of soil was discussed in Section 3.2.3 (Pages 13 and 14) of the PEA Report. Sources of the dirt and quantity of imported soil, although may be of importance to know the origin of the soil, are not necessarily pertinent to the site investigation and soil sampling results and not within the scope of the project, as described in DTSC's General Response 1. The focus of the PEA investigation is whether the site presented a threat to the public health and welfare. DTSC's Cleanup Program Staff cannot comment on whether other agencies or other branches of DTSC have or are examining source of the imported soil to the site. Such considerations or investigations will take their course and are beyond the scope of the PEA, and are not relevant to whether the Site presents a potential risk to public health.

Comment 1.6. - The hauling slips were included as exhibits in the report. They are almost completely useless and unreliable. Most of them are not completely filled out. Those that contain detailed information want the reader to believe that each truck was able to fill their load in only 2 minutes. That same two minutes was listed as the

time each truck took to unload the dirt. This seems highly unlikely. In addition, there were supposedly only 7-8 trucks that hauled in this dirt. However, my husband and I were home on the first day that trucks brought the dirt in and I personally saw 12 trucks deliver dirt to the site, one following closely behind the other. If we are to believe that only 7 trucks were involved in the import of the dirt, for me to have seen 12 trucks drive by my home that morning, would have meant that the trucks would have had to make a second trip to Torrance and back. However, that did not occur. I saw the 12 trucks in short order deliver dirt to the site. So where are the haul slips for the other trucks. There had to be more than 7. This information would surely have come out if any of the residents like myself that had first-hand information about the dirt had been interviewed as part of this investigation. But most importantly, if the source of the dirt and quantity of the dirt are irrelevant to you and your mission, then all references to the source and quantity should be removed from the report. To leave this information in as is seems to indicate that these materials have been vetted and found to accurate and complete.

Response: *The soil hauling information is provided for the project background information but it is not relevant to assessing potential health risks as explained in DTSC's General Response 1.*

Comment 1.7. - It is stated in the report that AYSO received permission by PVPUSD to import the dirt to Ladera Linda. That is completely contradicted by video recordings of the July 2016 school board meeting. Both the Superintendent and other School Board members stated absolutely that there was no written evidence that they had ever granted permission to AYSO to import the dirt. In addition, after the dirt was imported, I personally reached out via email to the school board and asked about the dirt. They said they knew nothing about it. The statement in the report about AYSO being granted permission is simply not true and should be removed from the report.

Response: *Please note that the PEA Report was prepared by Avocet on behalf of the PVPUSD and PV AYSO. The information in the PEA Report was submitted with PVPUSD's approval. DTSC believes that this question should be presented to the PVPUSD, rather than to DTSC, to further resolve this issue.*

Comment 1.8. - Again, if the only thing that is of concern to you are the test results of the dirt that is stockpiled at Ladera Linda and all other information about source, quantity, purpose are irrelevant, then they should be removed from the report. At a minimum, an introduction should be made in the report that states that the information presented within the document concerning the source and quantity of dirt brought into the site by AYSO is based solely on interviews with AYSO and PVPUSD and that no attempt was made to corroborate that information.

Response: *Please see Response 1.6. The recommendation is addressed in the PEA Report, Section 3.7, which states that Avocet interviewed PV AYSO and PVPUSD for information gathering.*

COMMENT 2 – MICKEY RODICH

Comment 2.1 - I have received and read your Preliminary Assessment Report for the Ladera Linda Site and am glad to hear that this long controversial issue has been put to rest. I am sorry that I am not able to attend your public meeting scheduled for tomorrow evening, because I have a prior commitment. Your Fact Sheet states "Preliminary", however the back side of your Fact Sheet states "DTSC only considers bulk asbestos containing debris to be hazardous waste and a hazardous substance if it is friable. The Report concluded that no further investigation is needed for the Site due to the absence of hazardous substances". Does that not mean that your Report should be called "Final" and that the soil can stay on the site and the AYSO can begin to use the 2 upper soccer fields immediately? I know that you wanted to make sure that the soil was safe because our children could have been at risk.

Response: *The PEA Report is not final until DTSC makes its final decision on the report only after evaluating all comments submitted to DTSC during the public review period.*

With regards to the use of two upper soccer fields, please note that DTSC wants to clarify that these fields are not part of the Site and have not been restricted in any way by DTSC.

Comment 2.2 - I know that you sent this latest Report to residents in our neighborhood and the City of Rancho Palos Verdes has also disseminated it on their website a number of ways, evidently some people did not receive a copy of your Report. For your information, I have received an anonymous letter mailed to me, with no return address or signature, a copy of which is attached, stating "Your Attendance Is Needed to Ensure That the Tainted Soils Imported onto Ladera Linda Fields are Removed From our Neighborhood". Are they misinformed or is there something that I am missing?

Response: *DTSC is not responsible for this correspondence. DTSC was made aware of the anonymous letter that was distributed. Therefore, DTSC is not able to verify the accuracy of the information included in the anonymous letter. DTSC stands by the PEA Report findings that no further action is needed for the Site.*

COMMENT 3 – SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

Would it be possible to get a copy (or link) to any documents made available to the public during the meeting on November 16, 2017?

Response: *A copy of the PEA Report can be accessed at:*
http://www.envirostor.dtsc.ca.gov/public/profile_report?global_id=60002419

DTSC emailed the above link to the Commenter on November 20, 2017.

COMMENT 4 - KEN DELONG

Comment 4.1. - The alleged contaminated soil matter at Ladera Linda has been a shackle on the Palos Verdes Peninsula since April 2016 when the DTSC conducted an “armed” raid on PVPUSD offices as well as the AYSO. Why did the DTSC believe an armed raid on these facilities necessary?

Response: *This question is beyond the project scope as explained in DTSC’s General Response 1. DTSC’s Cleanup Program, which is reviewing the PEA, is separate from DTSC’s criminal investigation team. Inquiries related to criminal activities may be raised to the Los Angeles County District Attorney’s Office, Environmental Crimes Unit at (213) 974-3512.*

Comment 4.2. - What prompted DTSC to give credence to the allegations that the soil moved from a Torrance building site to Ladera Linda was contaminated? Please clarify what the complaint contained that would motivate the DTSC to pursue Ladera Linda action?

Response: *DTSC detailed its reasons for requiring further review in the form of a PEA in the Consent Agreement with PVPUSD and PVAYSO and in its letter approving the PEA workplan, which may be found here:*

- http://www.envirostor.dtsc.ca.gov/public/deliverable_documents/6945434391/2016-10-14%20Ladera%20Linda%20Park%20-%20Consent%20Agreement.pdf
- http://www.envirostor.dtsc.ca.gov/public/deliverable_documents/8143827676/Ladera%20Linda_Revised%20PEA%20WP_Conditional%20Approval_03.29.17.pdf

With regard to any criminal investigation, DTSC cannot respond to the question as it is beyond the scope of the PEA Report. Any questions or inquiries related to complaints may be raised with the Los Angeles County District Attorney’s Office, Environmental Crimes Unit at (213) 974-3512.

Comment 4.3. - We wonder, is it a criminal activity to provide illusory data to the DTSC?

Response: *To the extent this comment relates to the concern that the data used to evaluate the need for action at the Site was false, DTSC can respond. DTSC evaluates concerns on their merits and has the expertise to evaluate evidence that is provided.*

In making these determinations, DTSC’s Cleanup Program relied on the results of soil sampling and laboratory analysis undertaken by professionals.

With regard to any specific evidence submitted by any particular member of the community, DTSC cannot respond to the question as it is beyond the scope of the PEA Report and DTSC Cleanup program overseeing the PEA.

Comment 4.4. - We are aware of the dissension between different DTSC groups and the refusal by the criminal division to provide soil samples to the compliance division thus forcing PVPUSD / AYSO to pay for further soil testing.

Response: *DTSC clarifies that there is no dissension between DTSC programs, as the cleanup and enforcement programs have different objectives. DTSC's programs are the 1) Cleanup Program's Brownfields Restoration and Schools Evaluation Branch and 2) the Hazardous Waste Management Program's Office of Criminal Investigation. Both branches have followed DTSC's procedures and policies in managing their projects, and typically both branches or programs maintain separation in order to preserve the integrity of any ongoing criminal investigations. The soil sampling required as part of the PEA was an independent cleanup evaluation, which is in keeping with DTSC's procedures and policies.*

Comment 4.5.- The PVPUSD has spent in excess of \$400,000, a significant amount of taxpayer funds, to satisfy DTSC demands. We the people believe that these funds could have been better spent on PVPUSD educational and infrastructure needs rather than the egos of Sacramento bureaucrats. We trust that the DTSC findings that there is no contaminated soil at Ladera Linda ends this debacle.

Response: *As indicated earlier, the PVPUSD and PV AYSO entered into a Consent Agreement to perform a PEA at this site to determine any potential risk to human health and determine whether any further action or remediation is required at this site. DTSC also provided a 30-days comment period for the PEA due to the specific interest the community members have expressed in this project. Once DTSC completes its review of the comments and responded to all the comments received during the comment period, DTSC will take action regarding its decision on how to finalize the PEA investigation.*

Comment 4.6. - December 11th DTSC extended the period for public comments to December 15th, 2017. Since it is now December 18th can we, the interested public, presume that the period for further comment concerning the Ladera Linda site has now, hopefully, closed? Will DTSC provide a FINAL report to the interested public? When can the FINAL report be anticipated? Will the FINAL report finally close this sad endeavor?

Response: *The comment period closed on December 8, 2017. DTSC has issued a public notice that it will consider late-filed comments so long as those comments are received by DTSC on or before December 15, 2017. DTSC has considered and responded to those comments in making its final decision. DTSC has finalized its decision regarding the PEA investigation.*

Comment 4.7. - Will the FINAL report include a time line that shows there was no friable asbestos contaminates when the “soil” arrived at the Ladera Linda site in Ranch Palos Verdes from Torrance, California?

Response: *The final PEA report does not state that there was no friable asbestos containing materials when the soil arrived at the Site. This evaluation is outside the scope of the PEA described in General Response 1.*

Comment 4.8. - Will the FINAL report address why DTSC instigated DTSC’s armed raid on PVPUSD and AYSO facilities? Will the information that Peace Officer Stephen Hardy has/had that warranted the issuance of a sealed “Official Information Privilege” complaint be released to the public? If not, why not?

Response: *With regard to any criminal investigation, DTSC cannot respond to the question as it is beyond the scope of the PEA Report. Any questions or inquiries related to complaints may be raised with the Los Angeles County District Attorney’s Office, Environmental Crimes Unit at (213) 974-3512.*

Comment 4.9. - It would seem that fraudulent information was provided to the DTSC that created almost two years of turmoil in this community and almost \$1 million in public / private funds that could have been better used for public benefit. Is it not a crime to make a fraudulent complaint to the DTSC?

Response: *See Response to Comment 4.3.*

COMMENT 5 - C. J. “KIT” RUONA

Comment 5.1. - A RPV citizen advised me that he was at a Starbuck’s one morning during the spring of 2016 when several armed individuals who he described as DTSC employees left to conduct raids on the Ladera Linda site, the Palos Verdes Unified School District (PVUSD) offices & American Youth Soccer Organization (AYSO) offices.

1. Does DTSC have a criminal division?
2. If not who would these people have been?
3. Who issued the search warrants these officers would have needed?
4. What is the status of this?

Response: *DTSC does have an Office of Criminal Investigation under DTSC’s Hazardous Waste Management Program. Please use the following electronic link to find out more about the Division:*

<http://dtsc.ca.gov/HazardousWaste/OCI.cfm>

DTSC’s Office of Criminal Investigation does have authority to obtain warrants and to conduct criminal investigations. The investigation is beyond the scope of the PEA.

For additional information regarding the criminal investigation please contact the Los Angeles County District Attorney's Office, Environmental Crimes Unit at (213) 974-3512.

Comment 5.2 – Since there has been at least five tests done on the dirt at Ladera Linda & no health risks have been found (in other words the dirt is clean) what more can be done that would extend the deadline beyond December 8, 2017? The community needs a final decision & to put this behind us.

Response: *At this point the public comment period has ended. DTSC considered late-filed comments received by December 15, 2017. Please see DTSC's General Response 6 for a description of the public comment period and DTSC's determination that a formal extension of the public comment period of 30 to 90 days was not warranted.*

Comment 5.3. - I understand this has cost the PVUSD about \$400,000 (tax dollars) so far. It has cost the AYSO untold dollars at the expense of young soccer players. How did this episode begin & will these entities be compensated since they did nothing wrong? This appears to be a terrible injustice.

Response: *On or about April of 2015, material was imported at the direction or consent of PVAYSO to property owned by PVPUSD. Testing undertaken by PVPUSD indicated that certain construction debris found at the site contained friable asbestos. DTSC reviewed the reports provided by PVPUSD and determined that there had in fact been a release of hazardous substances at the Site in the form of a piece of friable asbestos vinyl sheet flooring.*

DTSC takes its responsibility to protect public health and the environment very seriously whenever there is a release of hazardous materials or substances consistent with its statutory duties. Here, the release was adjacent to an active youth soccer field, which raised considerable concern for the community. Although the identified asbestos containing materials were removed from the site, PVPUSD and PVAYSO recognized DTSC's and the community's concerns and entered into a Consent Agreement with DTSC, which detailed the process to evaluate whether the material stockpiled onsite retained additional material of concern or if the release was limited to the identified materials.

DTSC's expert environmental scientists, engineers and geologists worked with PVPUSD and PVAYSO's experts to prepare a plan to study the stockpile (known as PEA Workplan). The PEA Report indicates that no asbestos fibers were detected at the Site.

Comment 5.4 - I recently sent you an e-mail with questions regarding this matter. I also would like you to see an e-mail that I sent to Rancho Palos Verdes Councilman Kenneth Dyda. It presents my view, as well as many others in this community. I suggest you take it into consideration.

"I attended the Department of Toxic Substance Control (DTSC) briefing on November 16, 2017, at the Palos Verdes Interpretive Center. The individuals representing the DTSC who gave the briefing appeared to be very well educated on the subject they discussed. They concluded based on their study, as well as at least four other studies of the soil in question that it presents no health problem whatsoever to our community. This whole episode has been questionable from its inception & now based on solid facts appears to have been ill conceived. I have been told that it has cost the Palos Verdes Unified School District at least \$400,000 thus far. If this is true these are precious dollars that could have been spent in a more productive manner. It has also cost the AYSO dearly. This is ridiculous & the episode should be allowed to be finalized on December 8, 2017, the date the DTSC suggests. I am aware of people on the Peninsula who want to keep this thing going despite what we learned from DTSC. I hope you are not party to this. Perhaps a more productive endeavor for our city council would be to determine exactly how this became an issue, so it does not happen again. If you do this please enlighten your constituency since many of us are curious."

Response: *Comment noted and considered by DTSC.*

Comment 5.5. - I too am a concerned citizen of Rancho Palos Verdes who wants to know how DTSC became involved in this matter & how it escalated into becoming a criminal investigation. I want to know who to contact to obtain a copy of the statement of probable cause that was presented to Superior Court Judge Michael E. Pastor by Stephen Hardy when he requested, and received, his search warrant on April 26, 2016. I assume there was less than credible information contained therein based on the results of your tests.

Response: *See Response to Comment 4.2 regarding the criminal investigation conducted at the Site.*

COMMENT 6- CITY OF RANCHO PALOS VERDES (RPV)

Comment 6.1. - The City of Rancho Palos Verdes would like to receive a copy of the Final PEA and "Response to Comments" once it has been completed and released by DTSC.

Response: *DTSC will email a copy of the Final PEA Report and the Response to Comments to the City.*

Comment 6.2. - We have a few of questions that a member of our City Council would like answers to:

1. At what point will the school district be permitted to remove the fencing and protective cover from the site?

2. Are they permitted to do so now, or do they need to wait until the final PEA is issued sometime after December 8th?
3. If DTSC extends the public comment period for the PEA, would the school district be required to maintain the fencing and protective cover until the final PEA is approved at some future date or could it be removed sooner than then?

Response: *The school district may remove the fencing and protective cover from the site after DTSC makes its final PEA determination of no further action.*

COMMENT 7 - SANFORD DAVIDSON

Comment 7.1 - When were the USEPA Standards you used last updated?

Response: *The USEPA Standards were updated in June 2017. Please see DTSC's General Response 3 for additional information related to the use of USEPA Regional Screening Levels at the site.*

Comment 7.2. – I would like to bring the following issue to your attention and ask that you extend the Comment Period for the Ladera Linda Fields until Jan. 30, 2018.

I am writing as an individual and elected official of the Palos Verdes Estates City Council, and along with Steve Zuckerman as an individual and elected official of the Rolling Hills Estates City Council we are both asking for this extension.

I have spoken to and I am aware that Council Members Susan Brooks and Jerry Duhovic of the Rancho Palos Verdes City Council as individuals have also asked for the extension as well sent to Ms.Poindexter, DTSC Public Participation Officer. Ms.Brooks and Mr. Duhovic give permission to add their names in this request to you for the extension.

Initially the DTSC scheduled a community meeting on July 19th, 2017 and then cancelled the meeting.

The entire community that includes all four Palos Verdes Peninsula cities use the fields in question daily and homes surround the site. They would have liked to participate in the process that DTSC discusses on their website:

"DTSC managers and staff members believe the best decisions are made with a fully informed and involved public. Our approach is unique in that we involve the affected or interested communities on the community's terms."

The community needs more time to consider the serious nature of the situation and since the holidays are upon us we would be grateful for the extension.

This field is primarily used by very young children and residents have concerns about pesticides, asbestos, and contaminants found in three studies conducted over the past 2 years and any exposure to these young children.

Response: Please see DTSC's General Response 6 for a description of the public comment period and DTSC's determination that a formal extension of the public comment period was not warranted. DTSC has considered, however, late-filed comments received by December 15, 2017.

Comment 7.3. - I have received your response not to extend the comment period for the Ladera Linda field.

Your attitude is very disappointing.

The soils will still be here in January and there is simply no apparent reason for you to limit the public participation.

Your comment regarding the present condition not posing a problem is true, because the entire berm is capped tight. This was done for a reason. DTSC filed a Fence and Post Order signed on August 1, 2016.

The strong administrative order for this site was taken seriously by the community and set forth many concerns that still exist.

I believe that you have not considered the significance of the 4 Palos Verdes Peninsula Council members who have asked for the extension. It is rare for so many city council persons of different cities have come together as we have to protect the safety of the children who use these fields.

The DTSC cancelled the RPV July 19th meeting without reason or cause for the community before your report was written.

You held a meeting on November 17th, after the fact. After the investigation is not public participation.

Therefore, you have dismissed the due process rights of all residents that are written as the DTSC Public Participation process.

We have very intelligent residents living in Palos Verdes some of whom are engineers and scientists and we have many concerned residents who like you have read all three environmental reports. They would like to comment on the all of the reports.

If any of us had known that you were going to have such a limited time for comments we would have spoken up sooner.

Both the Alta and Leymaster reports cite the Organochlorine Pesticides known to be carcinogenic in the soils.

We do not want dichlorodiphenyltrichloroethane (DDT) and Chlordane known to be in the 24,000-cubic-foot berm to be unleashed onto the field through rain and erosion.

We do not want our youth exposed to these known carcinogens.

These pesticides have been banned as long as we can remember. What are they now doing on our children's play field?

These pesticides cannot be used by any persons today at any site that I know of, and especially on a school field.

It troubles me that the DTSC finds it permissible to allow carcinogens to be in contact with children.

It troubles me that DTSC finds it allowable that imported soils onto school property were not tested prior to importation and that were not signed and signed for and approved by any Professional Engineer or CA Geologist before dumping.

It troubles me that DTSC finds it irrelevant as to the sources or origin of these soils even though current Avocet report and Alta reports cite at least 2 different sources of the soils.

LAUSD policy and criteria would not allow for these soils imported onto their school sites and there is no reason for these outlawed pesticides to be on our children's soccer field. PVPUSD should be held to the same standard as LAUSD.

Residents and community would have liked the opportunity to work with you on this investigation.

Instead you are trying to close the door on the very process that you state that you promote: Public Participation.

In this case that has simply not happened.

Response: As described in the Background/Purpose section of this document, although the site is owned by PVPUSD, there is presently no school at this site, making the reference to school criteria irrelevant. DTSC does not use LAUSD's policy for making site decisions including the importing of soil or hazardous waste determinations. Based on the PEA results, DTSC determined that the low levels of organochlorine pesticides present in the soil do not pose a significant risk to human health as explained in DTSC's General Response 3.

With regards to the July 19th meeting cancellation, DTSC explained that the meeting was cancelled because DTSC did not have any new information at that time to share with the community.

Please see DTSC's General Response 6 for a description of the public comment period and DTSC's determination that a formal extension of the public comment period was not warranted. DTSC has considered, however, late-filed comments received by December 15, 2017.

COMMENT 8 - SANDRA VALERI

Comment 8.1. - Were screening levels for petroleum hydrocarbons, volatile organic compounds (VOCs), pesticides, herbicides, PCBs and metals for ADULTS or CHILDREN?

Response: *DTSC used established screening levels that are protective of both children and adult receptors as described in DTSC's General Response 3.*

Comment 8.2. - I would like someone to explain to me why there is a "Public Participation Specialist" now assigned to this project, since there is absolutely no desire on the part of DTSC to have any public participation. This individual should be removed from the project and save taxpayers some money since they certainly aren't facilitating any public participation at all. It appears that DTSC's only goal and in fact is to cut off, shut down, limit or avoid any public discussion or comment.

Back in November 2016, **over a year ago**, I contacted Mary Maurer at DTSC regarding this project, and how the public might participate in the process. I had a series of emails exchanged with Ms. Maurer. I was told that I would be contacted for an interview, but it was never arranged. I am attaching below the email chain we exchanged so that you can see that I tried to participate very early in the process. But of course, DTSC doesn't really want anything to do with real public participation. Your words regarding public participation are nothing but hollow lip service and window dressing.

Today the citizens of our city have been informed that you have denied our requests for a reasonable time extension.

This is an insufferable affront to the citizens of our community. You granted extension after extension to PVPUSD and AYSO to respond to your requests and to correct deficiencies. But the community you have kept in the dark and isolated with no information or input. You cancelled a meeting scheduled for July 2017 where we possibly could have had questions addressed on the process. We are finally invited to comment only after you are ALL DONE. So, it's really too late to ask for or provide input after you're all done isn't it? You publish a document which was written, not by an unbiased third party, but by a company hired by and beholden to AYSO. You finally hold a meeting, but act like you are doing us a really BIG favor by talking to us at all. And then we are informed that we will have only 3 more weeks to submit comments, weeks

which includes major holidays. Members of our city council reach out to you regarding a reasonable extension of this comment time. But you say NO WAY. You can give multiple extensions to AYSO and PVPUSD but NONE to the CITIZENS or RESIDENTS who have lived with this illegally dumped dirt and the carousel of stories and lies since April 2015. I say it was illegally dumped because they violated local city ordinances by refusing to obtain any of the required trucking and grading permits.

Tell me please what is the "Public Participation Specialist" doing on this project? Exactly what kind of participation does he specialize in? Is his job actually to limit participation and comment? What will happen when the intrepid few manage to deal with your insultingly brief comment period, which overlaps Thanksgiving, and preparation for Jewish holidays, and Christmas? There are some very intelligent and educated people in this community, scientists and engineers, who have reviewed this PEA document and the prior test results, and they find inconsistencies and errors. Those of us familiar with the history of the events are appalled by the fictional account contained in the PEA. What will happen to the comments that you do receive despite your best efforts to not get any? Will you take our comments and dump them in the round file or use them for toilet paper? Will anyone actually READ them, or respond to them, or revise the final document to reflect comments? Or is it all just another dog and pony show to pretend you care what we think? How are we supposed to view this process as anything other than an expensive farce?

Response: DTSC is committed to evaluate and respond to all comments received. DTSC's project team, including the Public Participation Specialist have carefully evaluated all comments and concerns and prepared the community outreach activities and Community Profile as explained in DTSC's General Response 2. DTSC cannot comment on compliance with city ordinances or requirements relative to permits for dumping and suggests such concerns be raised to the appropriate city.

Please see DTSC's General Response 6 for a description of the public comment period and DTSC's determination that a formal extension of the public comment period was not warranted. DTSC has considered, however, late-filed comments received by December 15, 2017.

Comment 8.3 - I contacted you before, and am asking you again to please extend the period for responding to the PEA.

You conducted your one and only public meeting just 3 weeks ago. And this comment period overlaps with Thanksgiving week, and holiday preparation time for Christmas and Hanukkah. So people do not actually have a full 30 days to repose. We have much less due to major US holidays. And also we could even begin on prepare our responses until after the meeting that was held on 11/16/17.

You have granted extension after extension to PVPUSD and AYSO. This is the ONLY ONLY ONLY opportunity that you have allowed in the entire process for the public to

have any input what so ever. You refused or declined to interview any residents during the entire project. You never talked to any of us, or allowed us to view preliminary versions of this document, for even to review the work plan prior in advance.

In the one and only opportunity and you finally decide to allow the affected residents an opportunity to review the documents and the test data, why can't you treat us with some of the same respect that you gave to AYSO and PVPUSD? Don't the residents and tax payers deserve some consideration also?

We have jobs and families and holiday activities, and now are staying up ALL NIGHT for multiple nights trying to respond to your unnecessarily harsh deadline.

Please grant us a reasonable extension to complete our review and comments.

Response: See DTSC's General Response 6 for accepting comments by December 15, 2017.

Please note that interviews with some community members were conducted by DTSC as described in DTSC's General Response 2.

Comment 8.4 - I am formally submitting my comments to you within the extremely unreasonable time frame. These are being submitted as required on 12/8/17.

I am half asleep, and can no longer read what I type. I apologize that my document may contain silly typos and mistakes due to exhaustion.

I heard that you recently did give an extension for comments to another project in another city. But again, you uniquely treat our community worse than dirt.

I hold no real trust that DTSC will actually consider these comments, but I still feel it is my duty to provide them. Someone must stick up for the children of our community and our environment. Sadly, I no longer believe that DTSC has any interest in protecting children or the environment. You are poised to say there is nothing wrong with 85 truckloads of illegally dumped dirt, imported from an unverified source, littered with construction debris and asbestos, and contaminated with pesticides, heavy metals, and cancer-causing compounds, being dumped on a pristine clean children's soccer field. in an ecological sensitive area, next to a nature preserve with many special species including the endangered gnatcatcher. I guess if your children aren't playing there, it doesn't really matter to you.

These comments are provided in response to the Preliminary Environmental Assessment for dirt dump at the Ladera Linda soccer fields, written by AVOCET for AYSO under the supervision of DTSC. I provide these comments under protest regarding the deadline, and greatly stressed to complete them on time. These comments are not complete. DTSC recently added new documents to the Envirostar site, they have only been available for 2 weeks at most, not 30 days.

- The PEA was only made public less than 30 days ago, and the ONLY public meeting on the project occurred just 3 weeks ago.
- The comment period overlaps with the holidays of Thanksgiving, and preparations for the festivals of Christmas and Hanukah. Many people take vacations during this period, including my family, thus making response within your deadline almost impossible. Did you deliberately time the so-called 30 day comment period so it would overlap with these holidays, and thus effectively become a reduced period?
- DTSC FAILED to offer any reasonable extension of time for the community to issue comments, even though DTSC offered many extensions throughout the process to AYSO and PVPUSD.
- This is the first and ONLY time the public has ever been offered any opportunity to review to provide input, comments, or information on the project.
- Most the neighbors I asked did not receive received the survey that DTSC supposedly mailed to the Ladera Linda community. And no one I know received a copy of the Ladera Linda Community Profile; calling into question the accuracy of your mailing activity.
- After finding the Community Profile on EnviroStor, I was very surprise by find I was identified as a “Key Contact”, since no one ever attempted to contact me at all, not even once, during this entire project.
- I contacted DTSC over a year ago regarding concerns and pertinent information regarding the project, and I was told I would be interviewed, but it never happened.
- The public has been marginalized and discounted throughout the entire process.
- DTSC has shown prejudice against the community, and has not behaved in a manner that you would expect from a state agency that is supposed to be acting to protect the health of the community.
- DTSC FAILED to follow their own documented policy for community participation: “DTSC’s experience has clearly shown that a well-planned public participation program, fully integrated into the overall technical program is a key factor in successful site remediation, corrective action, permitting, and other DTSC activities where statute, regulation or policy requires public outreach. Moreover, communities that are involved early and throughout the decision-making process may be more trustful and supportive of the process.” Reading this one would get the mistaken opinion that the DTSC actually is interested in

and cares about the public. But this was absolutely not the case with this project where you deliberately treated this public like lepers.

- It is unclear what DTSC will do with these comments, given your prior lack of interest in community concerns; you will likely just toss them. There is no trust that you will read them, or evaluated them, or attempt to integrate them.

Response: *The community participation activities at the Ladera Site began in October 2016 as described in DTSC's General Response 2. DTSC continues to post project related document at the DTSC's website for public information since the Consent Agreement was signed in October 14, 2016.*

DTSC has carefully reviewed and evaluated all comments received for this project.

Comment 8.5. - On the EnviroStor website, this PEA report is referred to as the "Final" report. Please clarify. I did not think this was supposed to be "Final" until after all comments have been received and evaluated, and revisions made as necessary. If this is really "Final" then what is the purpose of the comment period at all? Is the comments period a hoax and pretense, or is this document not actually "Final" yet?

Response: *Please note that the document is entitled as: Preliminary Endangerment Assessment (PEA) Report". The PEA Report becomes final only after DTSC evaluates all comments received and issues a final determination.*

Comment 8.6 - A general comment, I found the entire tone of this document to read like an apology for AYSO. That might be fitting since AVOCET prepared it for AYSO. But I was under the impression that DTSC would act as a neutral 3rd party to ensure an unbiased report and final recommendation, and that is absolutely not the case. This report contains extreme bias throughout. DTSC should ensure that the final product is neutral, reflects NO bias, and is strictly objective and scientifically sound. This document does not meet those minimum standards.

Response: *DTSC has evaluated the PEA based on the scientific information provided in the document to determine any risk to human health and the environment and believes that the document meets the standards used for preparation of a PEA. The tone of the document is not relevant to the PEA investigation or the results.*

Comment 8.7. - On page ES-2 begin the fictional account of "1,020 cubic yard of soil imported ... from Sharynne Lane in Torrance, CA." It has never been shown that the soil was imported from this site, and there is zero measure of how much soil was actually imported. This is a hotly debated issue, and it is more evidence of the extreme bias in this document, that this undocumented and unproved fictional history is provided here as undisputed fact. After reading outrageous lies like this, it is hard for a reader to

have any faith that the rest of the document is going to provide any else but additional misinformation, fiction and lies.

Response: *The information that soil was imported from a residential property in Torrance was based on the documentation provided in Appendix F of the PEA Report and discussed in Section 3.2.3 of the PEA Report. DTSC has not received any written record to demonstrate that the soil was not imported from the residential property in Torrance. In addition, please note that verifying sources of the imported soil is not crucial to the project scope which is described in DTSC's General Response 1.*

Comment 8.8. - At the one and only public meeting on the project, DTSC representatives stated that they did not want to get into the issue of the source of the imported soil; the source wasn't pertinent to this evaluation. And you only refer to "Torrance soil" to distinguish it from the native soil. In that case, all references to "Torrance soil" should be replaced with "imported soil" to remove the inherent bias in this document and to preserve some element of neutrality in the final DTSC issued and blessed document. Otherwise DTSC is authorizing a biased fictional account of history. If this history is not pertinent, then you should remove entirely any and all references to where the dirt came from. It would be most correct to simply state that 'AYSO imported at least 1020 cubic yards to the site, period. If it doesn't matter where it came from for purposes of this PEA, then remove it. Or you can say that AYSO states that all the imported dirt came Sharynne Lane in Torrance, however that has not been proven or established as fact, and is contested.

Response: *Please see DTSC's General Response 1 regarding the project scope and Response to Comment 8.7 regarding sources of the imported soil.*

Comment 8.9. - It is inaccurate to state that the imported dirt "was spread out on top of" the quarry soil. I don't know if DTSC personnel reviewed the Google Earth aerial photo history of the site. It's clear that the over in spring of 2015, 80-90 dump truck loads of dirt were dumped. You can clearly see the individual dump piles in the dated photos. Then that dirt was compressed into the current man made berm that exists today.

Response: *Google Earth Photographs from 2010 – 2015 were evaluated in the PEA Report, Section 3.2.2, which states that stockpiles of end-dumped soil were observed at the Site during March or April 2015 and that the soil was later leveled.*

Comment 8.10. More biased re-writing of history in the second paragraph of Site Background. Why does the report not reference Alta Environmental as performing the initial investigation and laboratory analysis? The memo from Alta that specifically warns PVPUSD about the findings of the asbestos, that rule 1403 has been triggered, and that a more complete investigation is required should be included here.

Response: *Alta Environmental investigation was discussed in Section 4.1.1. of the PEA Report and more investigations under the PEA were conducted at the Site as recommended by the Alta Environmental Investigation. Air monitoring sampling for the PEA investigation was conducted in accordance with the South Coast Air Quality Management District's Rule 1403 as stated in Section 4.3 of the PEA Workplan, dated March 10, 2017.*

Comment 8.11. - 3rd paragraph of background again shows extreme prejudice in language stating that certain compounds were “negligible”. This personal judgment should be replaced with scientific data. For example: ‘concentrations for certain compounds were above laboratory reporting limits, but below the established threshold levels’ is the kind of accurate, non-biased scientific language that should be used.

Response: *DTSC determined based on its review that the organic contaminants were detected below established human health screening levels. DTSC shall require corrections to the PEA Report as follows:*

*Page ES-2, First Complete Paragraph, First Sentence is revised as follows: “A series of investigations by PVPUSD and PV AYSO showed that the Torrance soil ~~did not contain~~ed organic contaminants at ~~other than negligible~~ concentrations **below human health screening levels** and that metals concentrations were within accepted background ranges.”*

Comment 8.12. - Pg ES-2, What is “spoil removed from trenches”?

Response: *it means waste material brought up during the course of a trench excavation.*

Comment 8.13. - Replace all references to “Torrance Soil” with “imported soil” everywhere in the document.

Response: *The name was given to identify the soil layer, and changing the name does not affect the conclusions of the report.*

Comment 8.14. - There is no evidence to confirm or verify that the concrete pipe with asbestos originated with the native soil. This is pure conjecture and does not belong in a scientific document. There was no building on that site prior. In fact, later in this document, the idea that the pipe could this pipe could have originated from the site is contradicted. Quoting now from page 9 of this document, “there is nothing in the Site’s history to suggest it might have become contaminated by past land uses.” In contrast, the statement regarding the vinyl flooring found with asbestos is appropriate. It states that the vinyl flooring is inconsistent with the building material removed from the Torrance site, but does not make any unproven guesses about where it may have come from. If the concrete pipe is inconsistent with material removed from the purported Torrance source, say so, but don’t make other wild guesses about its origin.

Response: *The justification regarding the location where the concrete pipe was found is provided in Section 6.1.6.3. DTSC considers this justification reasonable.*

Comment 8.15. – Page (Pg.) 1, 1.1, again the fictional unproved account of dirt all imported from a residence in Torrance. Delete this fictional account, since DTSC has stated that it is immaterial where the imported dirt came from. Or do a real investigative analysis and provide all sides of the story

Response: *See DTSC’s response to Comment 8.13.*

Comment 8.16 - Pg. 1, 1,1, “AYSO no longer intends to use the (imported) soil for field maintenance purposes.” This is a very odd statement to include in this document. I can attach other correspondence where they state that is the only purpose for the dirt. What then do they intend to do with it instead? This is only half of a statement, and begs the rest of the answer. This should be removed, or the statement should be completed as to what AYSO does now intend to do with the dirt.

Response: *The statement was provided and confirmed by PV AYSO. DTSC recommends contacting AYSO and PVPUSD for future uses of the site.*

Comment 8.17 - When this question was raised at the one and only public meeting on Nov 16, DTSC stated that it’s not up to them what AYSO does with the dirt, and there is nothing restricting its usage if not contaminants are found to exceed acceptable thresholds; so the statement is superfluous and should be removed. Clearly this is not a legally binding statement. AYSO could change their mind again tomorrow if they choose, so it’s reflective of a current decision only, not a permanent position. What if they do change their minds again and decide to use this dirt to level the soccer fields that little children play on? Does that change anything?

Response: *The soil is not hazardous waste and does not pose a significant risk to human health as described in DTSC’s General Response 3, DTSC does not have any authority to restrict uses of this imported soil.*

Comment 8.18. - Does DTSC certify that this dirt is SAFE for children to play on and in? Do you guarantee that children will not be exposed to increased risks for cancer or asbestos related lung diseases from playing on or in this dirt?

Response: *DTSC acknowledges that the Site does not pose a significant risk to human health and the environment based on the investigation data.*

Comment 8.19 - Pg. 1, 1.1, for accuracy and completeness Alta Environmental should be identified as the agency that conducted the initial investigation, and those test results should be an attachment.

Response: Please note that Alta Environmental is a consulting company not a regulatory agency. Alta Environmental conducted the first investigation at the Site and the summary of its investigation results is discussed in the PEA Report, Section 4.1.1. DTSC also posted the results of the Alta Environmental investigations on the DTSC's website on October 14, 2016.

Comment 8.20 - Pg. 2, why is the scope of the DTSC limited exclusively to asbestos?

Response: DTSC determined that the initial testing results, including all detected chemicals did not pose a significant risk to human health, and only required additional testing for asbestos in the PEA. Please see DTSC's General Response 3.

Comment 8.21 - DTSC FAILED to investigate warnings from Alta Environmental regarding radiation at the site. Alta's memo with the warning for radiation should be included. And these warnings should be investigated.

Response: DTSC found no radiation hazard based on its field readings using a portable monitoring device.

Comment 8.22 - DTSC FAILED to use their own standards developed for school sites in conjunction with LAUSD to evaluate whether or not this site is safe for school age children. DTSC advisory states that all dirt should be tested before it is imported to school property.

Response: Please see DTSC's General Response 1 regarding the project scope. DTSC did not use the LAUSD criteria/policy or DTSC's Advisory Clean Imported Fill Material for the Site's evaluation because it is not applicable.

Comment 8.23 - Pg. 12, Again, more with the fictional biased account regarding the residence in Torrance purported to be the source of all the imported dirt. Did DTSC interview the Torrance city personnel in charge of building permits? If they did they would have found out that Torrance cannot verify that any of the dirt deposited at Ladera Linda originated from the purported site in Torrance. They also would tell you that no additional dirt was imported to that site to meet their fill requirements, all their fill needs were met by the soil on premise. So, the net export of soil was approximately 300 cubic yards as stated in the permit. Yes, this is an approximation, but if it changed dramatically, as AYSO suggests to 1050 cubic yard exported instead of 300, that would have required a revision to the grading permit. That DTSC simply accepts all this fiction without conducting a single independent check is yet more evidence of how extremely biased, prejudiced and unreliable this entire report is.

Response: The information regarding the import of 300 cubic yard of soil from a Torrance property is discussed in the PEA Report, Section 3.2.3; however, verifying sources of the imported soil is not within the project scope which is described in DTSC's General Response 1.

Comment 8.24 - Pg. 13, If the Sharynne Lane property received proper asbestos abatement prior to demolition, why is there building debris with asbestos in the imported soil? Why is there building debris with asbestos that does not match the material removed from the residence? The history is clear that this material is not native to the site, and thus was part of the import, so where did it come from?

Response: *DTSC evaluated the data from the imported soil to ensure that it is protective of human health and the environment regardless of the source. Also, please refer to DTSC's General Response 1.*

Comment 8.25 - At the community meeting a DTSC representative told the audience that this dirt could now be disposed of in any CA landfill. However, my research shows that even non-friable asbestos must be encased in plastic before it can be dumped, and still only only a handful of select locations will accept it. And if the asbestos cannot be encased, then there are even fewer landfills that will accept it. I would like for you to review this question again and answer in writing please, where can this dirt be dumped”

Response: *DTSC's reference to the Ladera soil being acceptable at landfills had to do more with the fact that the soil is free of hazardous substances. Based on the results of the PEA, the soil at Ladera is not contaminated with hazardous substances, and DTSC is not requiring it to go to a landfill. DTSC understands that each landfill has its own acceptance criteria and recommends that CalRecycle be contacted for this information. A link to disposal landfills in LA County that were identified on CalRecycle's website can be accessed at <http://www.calrecycle.ca.gov/SWFacilities/Directory/SearchList/List?COUNTY=Los+Angeles&FAC=Disposal&OPSTATUS=Active®STATUS=Permitted>.*

Comment 8.26 - Pg. 14, Avocet refers to the truck receipts as “compelling”, this is still more evidence of bias and self –congratulatory behavior. Clearly DTSC FAILED to perform any outside verification at all. The receipts appear to be manufactured after the fact. It is impossible to drive the route in the time marked on the receipts. Also the receipts indicate that only 6 or 7 trucks were involved in ferrying the dirt to the site, but several eyewitnesses recall seeing at least 14-16 trucks lined up along Forrestal Drive. There is an utter and complete lack of due diligence in any of this reporting.

Response: *This comment is not relevant to the contents of the PEA. See also DTSC's General Response 1 and Response to Comment 8.24.*

Comment 8.27 - Pg. 14, Avocet notes that fill imported from residential areas does not require approval from DTSC prior to transportation. However, Avocet and DTSC FAIL to note that the city of RPV DOES require permits to transport and import dirt into the city, and ASYO FAILED to obtain these legally required permits. Also the field is not an education site, and thus is subject to city jurisdiction. And AYSO FAILED to obtain the required Major Grading Permits. Also DTSC has developed rules for school owned properties, which state all dirt must be tested PRIOR to import. And DTSC Advisory

sates that all fill should be tested and approved by a PE before being accepted. Again AYSO FAILED to follow the DTSC rule for testing dirt prior to importing it to a school owned site.

Response: *This comment is not related to the contents of the PEA. See also DTSC's General Response 1 and Response to Comments 8.24 and 8.27 regarding the imported soil.*

Comment 8.28 - Pg. 18. In preparation for this document ONLY AYSO and PVPUSD personnel and their counsels were interviewed. No attempt was made to interview any of the residents. No attempt was made to interview anyone to check the story or source of the dirt. Even ALTA Environmental was not interviewed to gain a fuller understanding of their original findings of the friable asbestos or their warnings regarding radiation at the site. Clearly DTSC and Avocet didn't want to know any of these things, they just wanted to print the story that AYSO told them.

Response: *Input from the public, and information submitted by AYSO and PVPUSD were considered, as described in DTSC's General Responses 1 and 2. See Response to Comment 8.21 regarding the radiation concern.*

Comment 8.29 - Pg17. There is Zero indication that the all appropriate inquiry (AAI) Requirement was met. AVOCET only interviewed AYSO and PVPUSD. They did not interview anyone who had other information. They did not interview any residents. They did not interview Torrance offices to confirm stories on the source of the dirt, they did nothing to verify the trucking receipts, they did not even interview Alta personnel regarding their original testing or finding, or why they thought rule 1403 had been triggered.

Response: *AAI is not applicable to the PEA process. Alta Investigation results were discussed in Section 4.1.1 of the PEA Report and the air monitoring was conducted in accordance with the South Coast Air Quality Management District Rule 1403 as stated in the Section 4.3 of the PEA Workplan, dated March 10, 2016.*

Interviewing community members is performed for public participation activities which were conducted by DTSC as explained in DTSC's General Response 2.

Comment 8.30 - Pg. 22, Leymaster used discontinued and antiquated references for threshold limits. Also Leymaster decided not to test for any asbestos at all, either in the soil or in the building debris. In written response to RPV city questions, AYSO stated, asbestos testing wasn't required. However DTSC guidelines specifically state that materials originating from a residential site should target asbestos testing. These facts should be included in the PEA. The Leymaster test results are not valid since they did not use the current or correct threshold benchmarks. But the samples measurements are still valid, and should be re-evaluated against the CORRECT standards.

Response: See DTSC's General Response 3 regarding the evaluation of all previous investigation data, including Leymaster test results, for risk screening evaluation. DTSC's determination regarding asbestos was based on the 2017 PEA Report and not solely on Leymaster's report.

Comment 8.31 - Pg. 23. All Health Science Investigation tests and measurements were performed by a non-licensed individual. Moreover, the consultant who conducted those tests for PVPUSD has since been issued a warning by the licensing agency for misrepresenting his credentials and working without a license. Therefore none of those tests can be considered valid at all. The report should note that PVPUSD hired an unlicensed consultant to perform this work; therefore, it is not valid.

Response: DTSC disagrees with the conclusion. Please see DTSC's General Response 5 regarding the investigation conducted by the Health Sciences.

Comment 8.32 - Pg. 23. What about the samples collected by DTSC in July 2016? What if those contain asbestos, friable asbestos or other harmful compounds in excess of established threshold levels? If those samples found asbestos or other harmful material, does that require more extensive sampling? We know that DTSC has filed a criminal complaint with the DA's office, and that the DA is actively investigating it, so one could logically deduce that they had to find something on which to base filing a criminal complaint.

Response: The July 2016 investigation was conducted by DTSC's Office of Criminal Investigation. Please see Response to Comment 4.2.

Comment 8.33 - Pg. 30. Regarding Air Pathways and friable asbestos: The report states that the Air pathways for contamination were eliminated once the dirt was covered and fenced. Once the fencing and the plastic covering are removed, is this threat reactivated? Must the fencing and plastic covers remain in place forever to mitigate the Air Pathways danger?

Response: The PEA Investigation did not reveal any asbestos fibers in the soil. Therefore, there DTSC is not aware of any threat nor exposure pathway through the air from friable asbestos. If DTSC approves the PEA and determines no further action is required, then fencing and plastic covers will no longer be required.

Comment 8.34. - Many pieces of non-friable asbestos have now been found in prior investigations, and during the trench sampling. As the dirt pile faces natural erosive forces of wind, rain, and sun, what is the potential for the non-friable asbestos in vinyl flooring or roofing to become friable as it is exposed to the elements?

Response: Note that non- friable asbestos containing materials are not regulated by DTSC. Based on the current data, there is no evidence that non-

friable asbestos containing materials were eroded by environmental conditions given no asbestos fibers were detected in soil.

All detected pieces of asbestos containing materials encountered during the previous investigation and PEA Investigation were removed. During the PEA Investigation, no friable asbestos containing materials were encountered at the Site and no asbestos fibers were detected in soil.

Comment 8.35 -Pg. 32, 6.1.5. According to the EPA, “There is no known safe level of asbestos exposure,” That’s it. And I am compelled to remind you that this is a children’s playing field, not an adult’s workplace, so while Cal-OSHA limits are interesting, they have not been designated as the appropriate measure for a children’s play area.

Response: *As stated in the PEA Report, no asbestos fibers were detected in soil.*

Comment 8.36 - All air samples were taken while the field was being misting and routinely wetted down? And all measurements were taken at adult height? So if adults are playing soccer on this field after it rains, then probably everyone is fine. But if children are playing on a dry day, do we have anything to measure what they might inhale?

Response: *The inhalation of asbestos fibers due to the releases from soil is not a complete pathway because no asbestos fibers were detected in soil. The site does not pose a significant risk to human health including children as explained in DTSC’s Response to Comment 3. This determination remains the same regardless of weather conditions.*

Comment 8.37 - The DTSC FAILED to test for or measure the level of asbestos in the air that a child might be exposed to on a typical day at this site. The air samples need to be repeated to mimic real world conditions, dry, and at a 3-4 foot height.

Response: *See Response to Comment 8.36 regarding the air monitoring.*

Comment 8.38 – Pg.43, Regarding the Biological Survey, this is an ecologically sensitive area with many “special” species. It is critical habitat area for the endangered gnatcatcher. It’s almost laughable that Avocet only looked for nests on the plastic covered man-made berm. Maybe they should check the nearby the shrubs too?

Response: *See DTSC’s General Response 4.*

Comment 8.39 - Just off shore from the location of this field, there is an EPA superfund site, created by years of pesticide run-off. In this area, we are all very sensitive to the issue of contaminated run-off. This dirt contains many different pesticides, heavy metals, and compounds covered by Prop 22, and prop 65, How do you ensure that these compounds do not leech from the dirt dump and drain into the ocean?

Response: *The PEA concludes that no hazardous substances were detected in the imported soil that would pose a risk or hazard. The non-detected or low concentrations of any contaminants at this site makes any potential run-off from the Site not a concern with respect to hazardous substances.*

Comment 8.40. – COMMENT SUMMARY

- DTSC has failed to include the community in any meaningful way during this process. The public has been treated with disdain. DTSC has not lived up to their own documented policy for public participation.
- The Report was written by Acocet for AYSO, not for DTSC, and the extreme bias and prejudice is evidence through the document. DTSC needs to revise this document to ensure that it reflects a fair, balanced and neutral position, and focuses on the facts, not fiction.
- At least 85 truckloads of dirt were brought in from an unverified location. The dirt was brought in illegally; AYSO did not secure the required hauling permits or grading permits. The dirt was not tested first as is required by DTSC Advisory notice, for soil going to a school facility.
- According to LAUSD if pesticides and heavy metals reach “reporting levels” the dirt is considered unsafe for children, and they will not accept it for their schools. Those guidelines, developed for children safety, should be applied here also.
- DTSC needs to remember that the site is a playing field for children, and all tests and limit measures need to reflect the impact that any potential contaminates might have on young developing children.
- Recheck soil sample for pesticides and heavy metals using the most stringent limits for child safety.
- EPA has stated that there is no safe level of exposure to asbestos period. How then do you justify your findings that there is no risk? One air sample taken on 6/1/17 showed a definite hit for asbestos, and that’s taken at adult height, after misting down with dirt with water first.
- Air samples Testing methodology is compromised. Soil was continuously misted or wetted down, to weigh down dust and particulates before measurements. Need to redo tests in dry environment (no misting). Take readings at child’s height of 3-4 feet instead of adult height. and use local Palos Verdes air samples as reference point.
- This dirt is known to contain pieces of building debris with asbestos; what California landfills will accept this material in it’s current state.

- Is DTSC ready to certify that this dirt is absolutely safe for children to play on, and that no child will have an increase risk of cancer or asbestos related diseases due to playing on this dirt?
- Is DTSC ready to certify that this dirt is absolute safe, and that no special species found in the proximity will become ill or experience reduced virility due to exposure to any of this dirt and the contaminates in to?
- Is DTSC ready to certify that this dirt is absolutely safe, and runoff water will not carry any measureable pollutants from this dirt to the ocean and protected coastal zone?

Response: *No asbestos fibers were found. The 6/1/17 sampling found fibers, in air but none contained asbestos fibers. These comments summarize those listed from 8.4 to Comment 8.39. See DTSC's responses to Comments 8.4 to 8.39 for each bullet.*

Comment 8.41. - I appreciate that you did add a brief extension to the original comment period for this PEA. I wish that you had issued the extension earlier, so that we could have known to work on this over the weekend. But I am grateful that you heard the community and did add a few extra days.

Response: *Comment noted.*

Comment 8.42. - DTSC policy clearly states that the public is to be involved from the very beginning. Yet in an email I received and at the singular public meeting on this project, it was stated that the public is not typically involved in a PEA, but only after the determination that a clean up is needed. This is absolutely farcical. That puts the polluter entirely in charge of the PEA process and determining if the site should be cleaned up or not. I have read first hand in this one example how the polluter can twist the facts, or present just the portion of facts that they want DTSC to know. Without any other outside information, how is the DTSC to make a reliable determination in the best interest of the public health? You need ALL the facts, not just the ones that the polluter wants you to know. Also the PEA Guidance Manual clearly defines a process for allowing public comment during the PEA process. So it is entirely inappropriate for the DTSC to behave as if they are doing the residents of Palos Verdes a huge favor by allowing this like it is some kind of anomalous happening.

Taken from the PEA Guidance Manual:

“2.2.3INTERVIEWS

Interviews with current or former property owners, operators, facility managers, employees, occupants and/or site neighbors (owners and/or occupants) are necessary to obtain information regarding uses and historical physical characteristics of the site. “

Clearly the interview section of the PEA is deficient as they did not attempt to interview anyone other than AYSO or PVPUSD related personnel to reinforce their own story.

Response: *Health and Safety Code, section 25356.1(e) requires a 30-day public comment period and meeting for a remedial action plan. The public participation for a PEA is not regulatorily mandated. DTSC conducted the public participation activities for a PEA as explained in DTSC's General Response 2.*

Section 2.2.3 of the PEA Guidance is used to obtain information regarding uses and historical physical characteristics of the site. Interviews with community members is not required under this section but under public participation in Section 2.3 of the PEA Guidance. DTSC has conducted public participation as described in General Response 2.

Comment 8.43 - I want to make clear that it is not my goal or intent to prohibit play on the soccer fields. The soccer program is great for our kids, and I want them to be able to play. I do believe that they have just concluded their fall season. This stockpiled soil is NOT necessary for soccer play to continue. They were able to bring all 85-truck loads in here and shape and compress it into its current shape without interrupting their soccer program. And likewise they can arrange to remove it without interrupting their soccer program.

My concern is with the danger that the stockpiled soil will cause to the environment; including leeching toxic chemicals into the adjacent field. My concern is also with the affect this soil will have on our children's health if it is used on the fields as originally intended. I know that in the PEA, AYSO states that they no longer intend to use it for that purpose, but that is not a legal prohibition. For the last two years, they have repeatedly stated that is the ONLY reason that they brought the soil here. Now they are "changing their mind". And tomorrow they may change their mind again. If they truly no longer intend to use it on the fields, then it serves no purpose what so ever, and it should be removed. Or the DTSC at the very least needs to assert that this dirt is not "clean", and cannot be used on a children's playing field.

Children should not be playing in dirt littered with pieces of construction debris and small pieces of building material with asbestos.

Response: *Please see DTSC's General Response 3 regarding the human health risk assessment for the Site. Please see Response to Comment 8.17 regarding the site uses.*

Comment 8.44 - The environmental review in the PEA did not extend beyond the plastic covered dirt, which is clearly a deficiency. Obviously, a gnatcatcher wouldn't be nesting on the plastic. This stockpile dirt is noted to lie within the habitat for many special species, and they needed to look in the surrounding area for signs of those species.

Birds are more sensitive to toxins than humans. Do the DTSC allowed levels for heavy metals, pesticides and the other found contaminants, take into consideration the damage that could be done to the protected species that reside in this habitat? What will happen to a gnatcatcher if they pick up a piece of vinyl with asbestos and take it to their nest?

Has the State Department of Wildlife approved that this stockpile of construction debris and its associative contamination is safe for all the special species residing in this protected habitat?

Response: *Please see DTSC's General Response 4 for the ecological screening evaluation. See Response to Comment 8.34 regarding asbestos containing materials.*

Comment 8.45 - I would like the DTSC to specifically identify which landfills in CA will accept non-friable asbestos that is not separated or encased in protective plastic.

Response: *Please see Response to Comment 8.25.*

Comment 8.46 - The airborne tests for asbestos fibers were a farce because they wetted down the dirt prior to conducting the test. Obviously heavy wet fibers are less likely to become airborne. Thus there is no measure of how much asbestos fiber may be in the air on a normal dry day. Also the tests need to be conducted at child height (3 ft) in addition to adult height to ensure there is no additional risk for children who play in this area. The the results need to be compared against Palos Verdes air baseline, not downtown LA air baseline.

This area was clean and pristine prior to 85 truckload of construction debris being dumped here. It has no business being here. It poses an environmental danger. It needs to be removed.

Response: *The air samples were evaluated on their own and not by comparison to downtown LA air. Also, please see Response to Comment 8.36.*

COMMENT 9 - KATHERINE BUTLER

Comment 9.1 - Do you have a copy of the Attachments to the 2015 Alta Environmental Report (dated December 3, 2015)? The main body of the report is posted on EnviroStor, but I could not locate the attachments (https://www.envirostor.dtsc.ca.gov/public/deliverable_documents/4555088877/Order_To_Fence_And_Post_080116_Rd.pdf).

Response: *All previously conducted investigation reports have been posted in DTSC's EnviroStor database at http://www.envirostor.dtsc.ca.gov/public/final_documents2?global_id=60002419&doc_id=60420213*

In response to an inquiry about this, the above link was also emailed by DTSC to commenter on December 5, 2017.

Comment 9.2. - Did Avocet submit data quality objectives and/or power calculations to DTSC to ensure a sufficient number samples were collected during the PEA? I was not able to locate these in the Nov 2017 PEA report.

Response: *The data quality objectives are discussed in the PEA Workplan which is accessible at https://www.envirostor.dtsc.ca.gov/regulators/deliverable_documents/2789228677/2017-03-10%20Revised%20PEA%20Work%20Plan%20-%20text%20tables%20figures.pdf*

The above link was also emailed by DTSC to commenter on December 5, 2017.

COMMENT 10 - DIANE SMITH

Comment 10.1. - Why did Avocet not test or sample for any Organochlorine Pesticides such as DDT and Chlordane nor did they test for Title 22 metals including barium, chromium, hexavalent chromium, cobalt, copper, lead, molybdenum, nickel, vanadium and zinc that were found exceeding the laboratory limits by the well-qualified Alta Environmental and of great concern by Alta Environmental in email correspondence to the PVPUSD? Or radiation as described in question 4?

Response: *Please see DTSC's General Response 3 for evaluation of detected chemicals. For radiation concern, please see Response to Comment 8.21.*

Comment 10.2. - After AYSO's Brent Daniel kept insisting the soil was "clean" as it came from Trump golf course, I spent two hours checking records at the City for property sold by Trump National for housing development. One of the streets in the development is called "Emerald View" and I discovered that the owners of T&M Trucking, (the trucking company that coordinated the collection and delivery of the soil) were building a home on the property they owned on Emerald View **in April 2015 – the exact time the dumping occurred at Ladera Linda.**

I was told that it is very expensive to dump soil that contains toxins – you already know that. Truckers have to transport the soil for many miles to a toxic soil dump site for proper disposal. I was told it is not uncommon for Trucking Companies to save a little money by mixing a load of bad with the good.

With that in mind, did DTST examine the bills of lading, the invoice numbers on the bills, the time taken to load up the dirt from Sharyland and deliver, etc. to see if the bills were faked or real? Maybe there was nasty stuff dumped with the good and that's why the mounds of dumped dirt were smoothed over and leveled? Did DTST question drivers, and investigate this possibility?

Response: *DTSC did not rely on bills of lading or any other statements about the origin of the soil to draw its conclusions, but rather evaluated previous investigations and required additional investigation through the PEA. This comment is not relevant to the PEA investigation. See also DTSC's General Response 1.*

Comment 10.3 - With regard to the illegal dumping at Ladera Linda/Portugest Bend fields, Ms. Taggart never did respond to my emails attached below. Please read this correspondence and provide answers.

Response: *This comment is not relevant to the contents of the PEA. See also DTSC's General Response 1.*

Comment 10.4. - I am very concerned about Alta Environmental's October 25, 2015 email to the School District representative stating, ". . . We discussed this issue of radiation; there are a couple of things that can be done – a health physicist can conduct a survey and/or samples can be submitted (either way its best to follow the advice of a health physicist"

This really made me sick. I spoke to people about radiation and they said it could be medical waste. I don't want my grandchildren playing soccer on a field smeared with medical waste – would you?

If you have not seen this email then please let me know and I will send it to you so you can provide answers. And if you have not seen this email then maybe you haven't seen the others – which will bring up more questions.

Your facts do not include:

The people who dumped the soil did not have the permits to dump – nor proper approvals – they must have known this – they were professionals. Were there fines imposed? I know the School District employee who opened the gate to all these trucks left his job after Alta Engineering discovered the toxins.

Those in charge of the dumping tried to hide where the soil came from and tried to get at least one City Councilman to go after a resident to shut him up. The councilman did go after the resident by making inquiry to the resident's employer which wound up having a complaint filed in the resident's employment file! What a mess.

If this dirt was clean and why was there so much effort to cover it up?

Response: *See DTSC's General Response 1 regarding the project scope and Response to Comment 8.21 regarding the radiation concern.*

Comment 10.5 - Why do you discard the report of the esteemed Alta Environmental in favor of an old guy that forgot to maintain his credentials and another firm that doesn't even identify their credentials?

Response: *DTSC did not discard any information provided in the Alta Environmental Investigation. See also General Responses 3 and 5.*

Comment 10.6 - It would be helpful if you could provide the names and credentials of those people who worked on the Avocet report, the history of Avocet and its subcontractor testing labs etc. and confirm that you have verified their credentials as valid. Because our past experience we have reason to question.

Response: *Avocet's reports were signed by Mr. Phillip Miller, a Registered Professional Engineer.*

Comment 10.7 - The esteemed Alta Environmental <https://www.altaenviron.com/> that conducted the soil sampling in 2015 is proud of its credentials and nationwide recognition. However, the School District did not seem to be happy with the results of the testing by Alta Environmental of the soil in question so the School District paid the School District's Law Firm to find a real knowledgeable specialist. What a doozie they found: Howard B. Spielman with his PE license cancelled in 2006 and his REHS license cancelled 2011!!!!The School District attorneys should be fired for not checking this guy's credentials:

(picture provided)

The Palos Verdes School Superintendent made a video in July 2016 with Attorney Terry Tao of the Atkinson, Andelson firm hired by the PVPUSD to recommend an expert. The Atkinson firm hired a dud that doesn't have proper valid credentials.

Spielman's Health Science Associates information is being used in the Avocet Report as Valid **when in fact California law states that only a licensed P.E. or Geologist can take samples and sign for them.**

What good was the Atkinson firm that didn't even verify this guy's credentials? And what good are you when you too rely on them?

Palos Verdes taxpayers/residents need to share this information with the concerned Ocean View taxpayer residents and other districts affected.

Instead of trying to cover this dirt up, the dirt needs to be removed from Rancho Palos Verdes to send the message loud and clear that anyone that conspires with and aids others resulting in subjecting our children and grandchildren to toxic junk must suffer consequences – fines and jail time.

Response: Please see DTSC's General Response 5 regarding the investigation conducted by Health Sciences.

Based on the PEA investigation, the imported soil does not pose a significant risk to human health and the environment. Therefore, DTSC is not requiring remediation or removal of the soil.

COMMENT 11 - GARY RANDALL

Comment 11.1 - My highest concerns can be extracted from section 10.1 of the report (summary and conclusion):

The first conclusion point indicates some history of the area and when soil was brought in, without any interviews of nearby residents, many of whom personally witnessed and documented the importation and dates. I believe this is a major oversight. Interviews of PVPUSD, AYSO, and construction parties clearly contain bias and it is unfair and incomplete for DTSC and/or Avocet to have not interviewed local residents. In the November 16, 2017 public meeting, DTSC officials tried to downplay the importance of these interviews and exactly where the soil came from and how it was spread out, stating that DTSC's primary focus is on whether there currently are hazardous materials in the soil or not. However, given the amount of pages in this report devoted to the historical aspect, it is clear that the history is playing some role in the investigation and conclusions.

Response: DTSC has contacted the community previously as described in DTSC's General Response 2. Please note that verifying sources of imported soil is not within the project scope as explained in DTSC's General Response 1.

Comment 11.2 - Bullet point #2 indicates that one piece of potentially friable asbestos was removed from the site in November 2015. In other areas of the report, it is indicated that this piece was removed and analyzed by Alta Environmental. I cannot find anywhere in the report whether it was determined that this piece of material did or did not contain friable asbestos. Why is that? We do know it contained 35% asbestos. For the sake of public safety, if this is not known for sure whether it was friable or not, then DTSC should be erring on the side of caution and assuming it in fact did contain friable asbestos unless or until proven otherwise. In the public meeting held by DTSC on November 16, 2017, DTSC officials were asked a direct question about whether Alta followed proper protocols, and the response by DTSC was that Alta did in fact follow proper protocol. The conclusion from all this is that at least one piece of C&D material, which potentially contained friable asbestos (and must be assumed to contain friable asbestos until proven otherwise), was found at that site by a reputable lab (Alta), that in DTSC's own words "followed proper protocol. How then can Avocet make the statement in bullet point #6 that "based on the absence of friable ACM at the Site, there are no complete exposure pathways...."

Response: DTSC agrees that asbestos was a contaminant of concern as recommended in the Alta Environmental Report. As a result, DTSC investigated the Site under a PEA as explained in DTSC's General Response 1. The PEA required further investigation at the Site to determine whether the friable asbestos containing materials may be distributed throughout the imported soil and whether asbestos fibers from asbestos containing materials may be present in the imported soil. The PEA investigation did not encounter any friable asbestos containing materials and asbestos fibers in the soil. Based on the PEA investigation, the site does not pose a significant risk to human health and no friable asbestos containing materials and asbestos fibers were encountered or detected at the Site.

Regarding a piece of friable asbestos containing material, DTSC noted a discrepancy between the December 5, 2015 Alta Environmental Report and the November 3, 2017 PEA Report. The Alta Environmental Report clearly stated that a piece of friable asbestos containing material was encountered in its investigation. DTSC presented in the November 16, 2017 meeting that a piece of asbestos containing material was encountered in the 2016 Alta Environmental investigation. The piece of asbestos containing material was removed prior to conducting the PEA.

DTSC shall require corrections to the PEA Report as follows:

- Page 19, Section 4.1.1., Paragraph 3, Second Sentence is revised as follows: “~~The roofing debris with mastic yellow sheet vinyl~~ was considered ~~potentially~~ friable, whereas the asbestos in the other two positive samples was considered nonfriable.”
- Page 46, Section 10.1 Second Bullet, Third Sentence is revised as follows: “Of these 24 pieces of C&D debris, 3 contained asbestos, with 1 of the 3 asbestos-containing pieces determined to be ~~potentially~~ friable and the other 2 determined to be nonfriable.”

Comment 11.3. - Bullet point #3 indicates that although some OCPs and metals were found, their concentrations were either “negligible” or “within acceptable background ranges.” On the surface, this would seem to be acceptable. However, given that this site is used for youth sports and recreation, and is owned by the local school district, it is reasonable to expect a more stringent standard for soils to be imported. A review of LAUSD policy on the importation of soil reveals that the detected levels of some of these chemicals and metals would have made this soil unacceptable for import onto LAUSD property. If LAUSD would not allow the import of this soil, why did PVPUSD allow it? As a state agency, does DTSC do any work in making sure standards are uniform across the state, so that soil this is not acceptable for use in one district is not imported to another district?

Response: *DTSC does not make decisions based on LAUSD's internal policies. DTSC relies on screening levels established by DTSC and USEPA. Please see DTSC's General Response 3 for additional information.*

Comment 11.4. - I am also greatly concerned that DTSC has decided not to extend the 30-day comment period for this report at the request of some residents. DTSC public outreach during this investigation has been minimal, residents were not interviewed as a part of the process, and PVPUSD has delayed and requested extensions numerous times during the DTSC investigation, all of which were granted to my knowledge. To flatly refuse to grant a 30 or 60 day extension to the comment period is unreasonable, given the volume of information presented in not only this report, but previous reports, and additional research that some local residents would like to conduct now that this PEA has been published. While I personally have not asked for an extension up to this point, I believe those that have asked for an extension deserve greater consideration in light of the above, and therefore I am now going to formally request the comment be extended for at least 30 days beyond the December 8, 2017 deadline.

Response: *Please see DTSC General Response 6 regarding accepting comments by December 15, 2017.*

COMMENT 12 - ANONYMOUSLY

I am not a scientist, but asbestosis and mesothelioma are serious conditions and are very concerning. If you were the parent of young children, would you have any concerns with them playing soccer on these fields?

Response: *DTSC is aware of diseases associated with exposure to asbestos, but has found no threat or unacceptable risk to public health for adults or children due to exposure from the subject soil in its evaluation and PEA investigation. In addition, no asbestos fibers were found in soil. As a result, the soccer fields are not restricted for any environmental reasons. See also DTSC's General Response 3 for further information regarding the human health screening evaluation.*

COMMENT 13 – DAN MURDOCK

As the findings have been presented there are no materials with risk identified. Why has it taken so long to receive this information? Please explain?

Response: *Sampling was completed in June 2016, after several iterations, the PEA was completed in November 2017. During this period, DTSC project manager retired and the project was assigned to another project manager.*

The public interest at the Site added significantly to the timeline to reach completion of the evaluation. It is not typically or regulatorily required to include a 30-days public comment period and public meeting for a no-further-action site.

To accommodate the community concerns DTSC initially provided a 30-day review period of the PEA Report and agreed to accept late comments received through the 37th day of public comment period and held a public meeting. In addition, DTSC had committed to respond to each of the over 100 commenters, which required extensive time and review by DTSC program and support staff.

COMMENT 14 – ROBINA SUWOL

Comment 14.1 - It is extremely challenging to comment in a short timeframe, especially when all pertinent documents have not been provided to the public, such as all soil testing results including but not limited to: Table 1, Attachment B from the document below.

(Section 5.1,
https://www.envirostor.dtsc.ca.gov/public/deliverable_documents/4555088877/Order_To_Fence_And_Post_080116_Rd.pdf).

Can you please send all results including Table 1, Attachment B as soon as possible given that the deadline for the public is December 8th, 2017 for comments.

Response: All “pertinent documents” have been provided to the public. All information regarding previous soil investigations are summarized in the PEA Report (Section 4). A copy of the previous investigation reports (Alta Environmental, Leymaster and Health Sciences) have also been posted on DTSC’s Envirostor database since November 18, 2016, and can be accessed with the following link:

http://www.envirostor.dtsc.ca.gov/public/deliverable_documents/2248385369/PV%20AYSO%20Initial%20Data%20Submission%20-%20Text%20and%20Exhibits%20-%20EStor.pdf

Such link was emailed by DTSC to the commenter on December 5, 2017.

Comment 14.2 - To reiterate, we are once again requesting an extension of time for the comment period on the Ladera Linda site. Thank you for providing the Envirostor link, however, we have reviewed the documents and have more questions than answers.

As you are aware, we have been contacted by numerous concerned residents and members of the public whose children play soccer at the site. Given the seriousness of the situation, and concerns that have been raised, we feel the least the agency can do is provide the additional time requested and any and all additional documents or data.

Response: See DTSC’s General Response 6, which also describes that DTSC agreed to accept and consider all comments received through December 15, 2017.

Comment 14.3. - I am writing to respectfully request an extension for the comment period surrounding: LADERA LINDA SITE Stockpiled Soil Area (North of Upper Ladera Field), 32201 FORRESTAL DRIVE RANCHO PALOS VERDES, CA.

California Safe Schools never received notification about this site, investigations, related meetings, or comment period deadline until today when I was contacted by concerned community members.

In addition, in reviewing records (please correct me if I am mistaken) it appears that the investigation by DTSC performed May 30th to June 7th, 2017 only tested for asbestos.

According to records, previous tests performed in 2015 detected: Title 22 metals including barium, chromium, hexavalent chromium, cobalt, cooper, lead, molybdenum, nickel, vanadium, and zinc.

Concentrations of several OCP's, including Chlordane total, Chlordane alpha, 4.4 DDD, 4.4 DDT, Endrin, Chlordane gamma, and Heptachlor Epoxide were detected above laboratory limits.

Total petroleum hydrocarbons (TPH), including TPH-d, TPH-o were detected above laboratory limits.

Given the that the chemicals noted above were discovered, and do not appear to have been included in the recent test performed by DTSC is haunting. Especially given the close proximity of the youth soccer field, and the fact that the piles of soil were permitted to remain without any covering for a significant amount of time, and that the half-lives of many of the chemicals noted above are decades.

Response: Please see the Introduction/Purpose section explaining that although the site is owned by PVPUSD, there is presently no school at this site. However, DTSC sent a copy of the Community Update on November 17, 2017 to California Safe Schools. The chemicals listed were evaluated and found to be below protective levels and therefore do not pose a significant risk to human health. Please see DTSC's General Response 3 for further information.

COMMENT 15 – JOAN DAVIDSON

Comment 15. 1. - Please provide the specific screening levels that DTSC is using for the Ladera Linda field PEA/assessment and provide the link back to me with the specific document and specifications

Response: The requested information was publicly available to any interested party. Please refer to guidance and tables provided in HHRA Note 3, available at http://www.dtsc.ca.gov/AssessingRisk/upload/HHRA_Note_3_August-2017.pdf

If the chemical screening level is unavailable in HHRA Note 3, USEPA RSLs apply and are available at <https://www.epa.gov/risk/regional-screening-levels-rsls-generic-tables-june-2017>

To assist the commenter, DTSC also emailed a table listing screening levels used for the Site and the link to access the specific document and specifications to the Commenter on December 5, 2017.

Comment 15.2. - Please send the EPA and DTSC Asbestos screening levels as well with which the Avocet report is based.

Response: *Neither DTSC or USEPA has established a screening level for asbestos. Consequently, DTSC's approach was to evaluate the soil for positive detections of asbestiform structures by polarized light microscopy (PLM), or any detection of asbestos fibers greater than 0.001% by transmission electron microscopy (TEM). Soil sampling and analysis were performed in addition to scouring the stockpile for asbestos-containing materials (ACM). Where ACM was encountered, co-located soil was analyzed to have a targeted sample and verify if there was an asbestos release from that material. None of the soil samples came back positive for asbestos fibers.*

Comment 15.3. - In addition, please advise if your Residential screening levels that you just sent are applicable for importation of soils to schools.

The DTSC Clean Imported Fill Advisory does not mention using Residential screening levels as a testing or screening method.

Where is it in writing that the DTSC uses Residential screening levels on importation of soils to schools?

Response: *The screening levels are used were used to evaluate the risk to human health based on the data collected at the Site. The screening levels were based on a residential/unrestricted land use scenario given that the property does not contain a school. DTSC does not regulate the transportation of soil unless it is a hazardous waste.*

Comment 15.4. - The community never received this document [Community Profile] that I found online in an Rancho Palos Verdes document.

No one has ever seen it.

There is an acute lack of communication in this process and unfortunate lack of public participation.

My husband and I are asking for you to please extend the comment period until Jan. 30, 2018 so that everyone can read the complicated reports that they became aware of after the Nov. 17th meeting. It's simply not enough time with working schedules. We'd appreciate your effort to accomplish this extension.

Response: *The public participation activities for the Site started in 2016 as described in the DTSC's General Response 2. The Community Profile has been available since January 18, 2017, to anyone wishing to view it.*

With regards to the extension request, please see DTSC's General Response 6.

Comment 15.5 - Thank you for stating that you will look for the referenced letter missing in the Avocet report and any other pertinent documents that pertain to the Health Science Associates report and letter pertaining to Health Science Associates test data that are not included in the current Avocet November 3, 2017 report as asked for by Joe Odenchantz, Ph.D. All documents are requested.

Response: *A copy of the July 2016 Health Science Investigation Report has been publicly available on Envirostor since November 18, 2016 and can be accessed at the link below, starting from Pages 342/456 to 385/456.*

http://www.envirostor.dtsc.ca.gov/public/deliverable_documents/2248385369/PV%20AYSO%20Initial%20Data%20Submission%20-%20Text%20and%20Exhibits%20-%20EStor.pdf

This information was emailed by DTSC's project manager to the requester on the day of the request (December 8, 2017).

Comment 15.6 - I have never seen this new information and at NO time has this information ever been available to the public, to me or any person that I am aware of.

We immediately need time to respond to the NEW information that you just sent. This includes NEW photos, declarations, reports, data, etc that have never been made available at all.

If you have just posted this the same day as the comment period is due it is not acceptable.

Why have you withheld this information?

Response: *The July 2016 Health Science Investigation Report had been posted on DTSC's EnviroStor database since November 18, 2016. DTSC responded on the same day and the Commenter contacted DTSC's project manager after the above comment was emailed on December 8, 2017. DTSC's project manager informed the commenter over the phone that the July 2016 Health Science*

Investigation Report was not recently posted but had been posted on the DTSC's EnviroStor database since November 18, 2016.

Comment 15.7 - This email is to memorialize that DTSC's project manager of Ladera Linda, sent to me and other community members that the Case Screens were listed at this link below as only 3 documents, but in fact that DTSC posted more recently a voluminous amount of information that the DTSC did not explain that ever to the community at the meeting or ever in any emails to community members.

When I could not find a referenced document, DTSC's project manager sent me the link below a 4pm.

I cannot nor can anyone accurately respond to a 450-page document that is a surprise.

There were only 3 case screens available to the community and just 15 minutes ago DTSC's project manager sent me a link to 450-page document that I have never seen nor has anyone else in this community.

At no time did DTSC ever post to residents that 450 pages of new information was available. Why is that?

We have to strongly request at least a few days extension to review this voluminous document.

When DTSC held the community meeting there was absolutely no reference to a 450-page new document you intended to post.

New document of 450 pages is impossible to review or comment upon in the next few hours.

http://www.envirostor.dtsc.ca.gov/public/deliverable_documents/2248385369/PV%20AYSO%20Initial%20Data%20Submission%20-%20Text%20and%20Exhibits%20-%20EStor.pdf

Response: *The 450-page document (Initial Data Submission) provided by DTSC is not a new document posted by DTSC as stated in the above comment but posted on DTSC's EnviroStor database since November 18, 2016. DTSC's project manager has verbally informed the commenter of the posted date in a December 8, 2017 phone conversation.*

DTSC is unclear what the three (3) case screens are. In the November 2017 Community Update and the November 16, 2017 Community Meeting, DTSC provided a link (http://www.envirostor.dtsc.ca.gov/public/profile_report.asp?global_id=60002419) to access project related documents including the Initial Data Submission.

With regards to the extension request, DTSC informed the public that it will consider and respond to all late comments received through December 15, 2017. Also, please see DTSC's General Response 6.

Comment 15.8 - (Email sent after a phone conversation with DTSC's Branch Chief on 12/8/2017) Just to memorialize our conversation today at 5:30pm after you called me back regarding my email on the late uploaded documents in the Ladera Linda Investigation by DTSC.

Today we became aware of a 450-page-other-pdf file at 4pm today after asking for a referenced letter to the project manager ChiaRin Yen that was not in the any of the 3 Case Screens sent out by DTSC Project Manager for Ladera Linda Investigation

The project manager sent out only the 3 Case Screens in emails to those asking for the Ladera Linda documentation.

All emails to Zenzi Pointdexter come back to everyone. Most likely she has not received any from our community- do not know why.

I asked simply if you would please grant a few days extension to review this voluminous document just forwarded.

You answered that you would 'take a look at it'

I asked if you would review the comments to you after the due date of today with the same weight as those sent in today.

You would not use those words, and reiterated that you would only 'take a look at it'

You believe that there is nothing wrong at the Ladera Linda site and were not concerned that 85 truckloads of alleged home remodeling debris was dumped onto a school pristine property used by 1000's of children and community as a parkland and recreation area.

Unlike other DTSC investigations or clean up perhaps naturally occurring or accidents, this was a deliberate dumping of 85 truckloads of debris containing we've found of DDT and Chlordane.

This is unacceptable.

You said it's only your responsibility to review if this soil is clean. I explained then perhaps this is a new DTSC policy and that's it's perfectly fine for other to do the same. Find a field and dump unwanted debris and untested soils onto any school property or park.

I explained that although you review these complicated documents every day, our residents are not all in your line of work and it does not come easily.

You would not extend the deadline by a day or an hour.

I explained that this is a very sad day for the DTSC and the spirit of public participation has not happened in this community.

I also said that I am sorry that you feel this way even though you have the authority to extend the time and you will not.

This is a sad day for justice for parents, community and sadder that even a State Senator Ben Allen, Sanford Davidson, PVE City Council, Susan Brooks, RPV City Council, and Jerry Duhovic, RPV City Council are being ignored by the Cal EPA.

Response: Please see DTSC's General Responses 2, 3, 4 and 6 regarding the DTSC's public participation in this project, risk associated with the site, and the extension request and DTSC agreement to consider and respond to all late comments received through December 15, 2017, respectively.

Comment 15.9 - DTSC has failed to adequately:

- provide public participation for the community.
- to interview community members who were originally asked to participate.
- to reach out to the AYSO parents whose children play at this field daily
- to provide the July 19th meeting for Public Participation without reason

Response: DTSC disagrees with these statements. Please see DTSC's General Response 2 for DTSC's public participation process. With regards to the July 19th meeting cancellation, DTSC explained in the November 16, 2017 meeting that the meeting was cancelled because DTSC did not have any new information for the public.

Comment 15.10. - DTSC has failed to include the Asbestos EPA residential screening levels in the report. DTSC/Avocet report is entirely based upon the levels of Asbestos found whether friable or non-friable since the Avocet company failed to test on its own for other contaminants of concern including Organochlorine Pesticides.

Avocet Report, Item 7.2 states that there are no EPA Residential Screening Levels for Asbestos.

Item 7.2 states that DTSC does not provide guidance on risk assessment for Asbestos.

The DTSC report fails to use any known EPA or DTSC screening levels for Asbestos and yet draws conclusions upon the safety of the field. This is not acceptable or credible.

Response: Residential screening levels for asbestos do not exist and can therefore not be used. Please see Response to Comment 15.2.

Comment 15.11 - Item 10.1 states the risks cannot be quantified. If our health risks cannot be quantified then this report is without merit and therefore not acceptable.

That is a complete and utter failure to use any screening level scientific data to draw a conclusion of safety.

This report fails to protect the children who play on the soccer field every day. EPA makes a complete distinction of the vulnerability of children to the contaminants of concern. DTSC fails to make that distinction. Andrea Hricko, USC Keck Medical School has written extensively on the vulnerable health effects of contaminants and children. Yet this Avocet report does not make any attempt to address children's exposures.

This report fails to protect the residents in the densely populated neighborhood known as Ladera Linda by not addressing the dumping of man-made materials onto a school field.

This report fails to adequately address the safety of the field for those who use this field for recreational purposes. Whether animals or children this report is not adequate.

DTSC fails to include the Children's Vulnerability and the Contaminants of Concern as known by all governmental health agencies and specifically the Organochlorine Pesticides found and confirmed by Alta and Leymaster Reports.

Response: DTSC does not consider the site to be a health threat to adults or children. A significant portion of this comment is not relevant to the contents of the PEA. In addition, DTSC disagrees with most of the statements made. Please see DTSC's General Response 3 for additional information regarding the risk screening evaluation conducted at the Site.

Comment 15.12. -CHILDREN'S VULNERABILITY - The fact that children are growing and developing makes them more vulnerable than adults to the adverse effects of environmental chemicals. Viewed very simplistically, cellular growth involves response to and acquisition of nutrients and chemicals in the cell's environment. Consequently, cells that are growing and replicating rapidly are more likely than cells that are quiescent to be influenced by chemicals, including substances that may not be beneficial. Growth is most rapid in utero and in early childhood, with a further spurt at puberty, and it is at these stages that environmental chemicals can have their most damaging effects.

Response: As previously indicated, DTSC has evaluated this Site and does not consider the site to be a health threat to adults or children. Comment noted.

Comment 15.13. - CONTAMINANTS OF CONCERN - Environmental contaminants are recognized to affect organ systems rather than to produce specific disease entities.

Moreover, some of the contaminants affect several organs. Thus, depending on the substance, and the extent, timing and duration of exposure, effects may be encountered on the brain, respiratory system, immune system, reproductive and endocrine systems, and the kidney and liver. Several classes of contaminants can be defined:

- certain metals;
- persistent organic pollutants (POPs);
- pesticides (herbicides, insecticides, fungicides and rodenticides);
- polyhalogenated byphenyls;
- solvents and volatile organic compounds (VOCs); and
- airborne pollutants.

Response: *As previously indicated, DTSC has evaluated this Site and does not consider the site to be a health threat to adults or children. Comment noted.*

Comment 15.14 – Organochlorines -Examples of organochlorines include DDT, Chlordane, Aldrin, hexachlorobenzene and pentachlorophenol. Pentachlorophenol is a wood preservative that is widely detectable in the Canadian population. While primarily active on nerve conduction chemistry, these substances are acknowledged carcinogens, and, based mainly on animal studies, are suspected teratogens, immunotoxins and endocrine disrupters. Many persist in the environment and continue to be manufactured for use in developing countries, for example, DDT for mosquito control. The search for affordable alternatives should be an international concern.²

Response: *As previously indicated, DTSC has evaluated this Site and does not consider the site to be a health threat to adults or children. Comment noted.*

Comment 15.15. - On 2/27/2016 AQMD issued a Notice to Comply. In July the PVPUSD hired as an 'expert' Howard Spielman. Spielman's P.E. license was cancelled in 2006. His REHS was cancelled in 2011. With an unlicensed 'expert' the PVPUSD unrolled the required plastic tarp and Spielman collected evidence into his pocket as stated on the district video. As an unlicensed 'expert' it is highly questionable if Spielman had any right to collect evidence or unroll and expose the dumped soils. The AQMD Notice was in effect and the right to violate an AQMD Notice is very questionable. The DTSC and Avocet report fails to address this incident. Avocet uses data from Spielman that until now has never been made public even though public funds were used to pay for his services, even though he was not licensed by alleged state boards. His data should not be included or admissible. BPEG served Spielman with violation on 6/30/2017.

Response: *Please see DTSC's General Response 5.*

Comment 15.16 - The Ladera Linda 85 truckload of imported soils of April 2015 do not meet the Criteria or Policy of the LAUSD Environmental Import/Export Material Testing

² <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC2805986/>

Section 01440. Soils do Not Comply with the DTSC Imported Clean Fill Advisory. No prior testing or approval was completed before import and dumping onto school field.

Response: *Please see the Introduction/Purpose section explaining that although the site is owned by PVPUSD, there is presently no school at this site. Also, please see DTSC's Response to Comments 7.3 and 8.22 regarding the LAUSD's policy and DTSC's Advisory, respectively.*

Comment 15.17. - In January 2016 Superintendent Don Austin, PVPUSD, posted on the District website that the soils did meet the LAUSD Criteria/Policy. PVPUSD does not meet LAUSD Criteria and does not meet the DTSC Imported Clean Fill Advisory.

Response: *Please see Response to Comments 7.3 and 8.22. Comment noted.*

Comment 15.18. -. At no time did the PVPUSD test the soils before importing in April 2015. At no time did the PVPUSD hire a P.E. before importation of these soils to sign off on the importation of 85 truckloads of these soils in April 2015. At no time did Rancho Palos Verdes give permission by permit or hauling routes to enter their city with these soils in April 2015. At no time would LAUSD accept soils with Organochlorine Pesticides exceeding lab screening levels. The DTSC report fails to address the protection of children and their environment by not addressing this condition.

Response: *This comment is not relevant to the contents of the PEA. DTSC disagrees with the statement that DTSC's report fails to protect children and the environment. Please see Response to Comments 1.6 and 8.24 regarding the imported soil and Response to Comment 11. 3 regarding the asbestos evaluation and use of screening levels for the Site's evaluation.*

Comment 15.19 - The levels of Organochlorine Pesticides tested and found to exceed the laboratory screening levels by Alta Environmental and Leymaster Environmental would never be accepted at LAUSD. Alta emails as to PVPUSD confirm this fact. These Carcinogens DDT and Chlordane exceedence results have been confirmed in two environmental reports by Alta and Leymaster in November and December of 2015.

Response: *Comment noted. Please see DTSC's General Response 3 regarding the human health screening evaluation for detected chemicals and Response to Comment 15.16 regarding the LAUSD's policy.*

Comment 15.20. - The Avocet Report fails to include the LAUSD Criteria and Policy on Import/Export of Soils to Schools. The Avocet Report fails to include the DTSC Advisory Clean Imported Fill Material.

Response: *DTSC did not use the LAUSD criteria/policy or DTSC's Advisory Clean Imported Fill Material for the Site's evaluation because it is not applicable (See Response to Comments 8.22 and 15.16). See DTSC's General Response 3 for further information about the screening levels used for the Site.*

Comment 15.21 - The Avocet Report fails to identify the increase in Organochlorine Pesticides found by Alta originally and found increased levels in Leymaster Reports. These are as known Carcinogens listed by the OEHHA and Prop. 65.

Response: *All organochlorine pesticides were detected below the screening levels and the Site does not pose a significant risk to human health as described in DTSC's General Response 3.*

Comment 15.22 - The major Organochlorine Pesticides of concern found are DDT, DDD, DDE and Chlordane. Chlordane has been found at 166 of 1300 hazardous waste sites on the EPA National Priorities List and is a known Carcinogen. DDT is a known Carcinogen and the reason for the Palos Verdes Ocean Superfund Site.

What are expected increases of flow into our waters due to this contaminated soil? The DTSC Screening level for DDT equals 0 in the Residential screening levels DTSC Table provided by Yolanda Garza. If the screening level is 0 then the soils do not meet the DTSC screening levels at this school property. This is not addressed.

Response: *The statement regarding the DTSC's screening level for dichlorodiphenyltrichloroethane (DDT) is "zero" is incorrectly interpreted. DTSC did not modify the screening level provided by USEPA RSL; therefore, DTSC accepted USEPA RSL as DTSC's screening levels which is 1.9 mg/kg. The maximum DDT concentration detected in the soil is 0.051 mg/kg which is almost two orders of magnitude below the screening level.*

Comment 15.23. - Avocet Report fails to use the LAUSD enforcement criteria at Ladera Linda field to ensure the children's human health risks and the assessments. No testing was done prior to importation.

Response: *See Response to Comments 15.16 and Comment 15.20.*

Comment 15.24 - No characterization in any investigation of the effects of known Organochlorine Pesticides on children has been carried out by DTSC. The Avocet report did not test for the known Organochlorine Pesticides in a separate investigation.

Both OEHHA and Prop. 65 identify DDT and Organochlorine Pesticides as carcinogens. Action needs to be taken as protective of human health.

Response: *All organochlorine pesticides were detected below the screening levels as described in DTSC's General Response 3. As a result, the organochlorine pesticides are not chemicals of concern at the Site and no additional investigation is needed for organochlorine pesticides.*

Comment 15.25. The 2nd Leymaster report showed huge increases in Organochlorine Pesticides levels compared to the 1st Alta Report yet the DTSC failed to take protective

measure to test with Avocet. The failure of Avocet to test for known Carcinogens is not acceptable.

Response: See Response to Comment 15.24.

Comment 15.26 - Alta Environmental David Schak warned the PVPUSD after testing these soils in October/November 2015 of that fact that LAUSD would not accept such soils.

DTSC and Avocet failed to retest to quantify the levels of Carcinogenic pesticides. To be protective of children's human health risks and assessments more studying of the situation must be completed and characterized.

Response: See DTSC's General Response 3 for the risk screening evaluation for organochlorine pesticides. See Response to Comment 15.20 regarding the use of the LAUSD's policy for the Site's evaluation.

Comment 15.27 - DTSC failed to complete an analysis for compliance for California laws as set forth by the Department of Pesticide Regulations, Integrated Pest Management Plans for School Districts, the OEHHA listing of known Carcinogens or the Children's Vulnerability and Contaminants of Concern in California law.

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC2805986/>

Response: The document in the link is a scientific document which discusses environmental contaminants and children's health. It does not directly reflect the results of the investigation/remediation of a site. DTSC disagrees with the comment.

Comment 15.28 - Although the DTSC has allowed the Avocet report to determine the 'safety of the soils' imported, at no time did Avocet test for Organochlorine Pesticides. Those Carcinogens found such as DDT, DDD, DDE, and Chlordane have been outlawed in the United States for a very long time. Why is DTSC allowing imported soils on a children's field, when DTSC is taking steps to rid other sites of Carcinogenic pesticides?

They simply do not belong on a children's soccer field or in the densely populated neighborhood known as Ladera Linda.

Response: As previously indicated, DTSC has evaluated this Site and does not consider the site to be a health threat to adults or children. This comment is not relevant to the contents of the PEA. DTSC was not involved with the soil import to the Site.

Comment 15.29 - According to the EPA it is illegal to dispose of Chlordane into the Environment.

“The authors presented clinical case histories of five children under the age of seven with neuroblastoma, all of whom had been exposed to chlordane in household situations, either in utero (three cases) or post-natally. They also presented three cases of aplastic anemia, with evidence of exposures to other pesticides in addition to chlordane in two of them. Three cases of leukemia were presented also, two of which had no known exposure to other agents besides chlordane.”

“Chlordane can be a serious hazard to the environment as well as to human health. It is illegal to dump chlordane into sinks, toilets, storm drains, or any body of water. Any unused pesticide or its container must be disposed of according to both the instructions on the label and state laws. For clarification of label directions or additional guidance, call NPTN or contact your state pesticide or environmental control agency or a hazardous waste representative at the nearest EPA regional office.”

https://webcache.googleusercontent.com/search?q=cache:qhMWFGSOISsJ:https://cfpub.epa.gov/ncea/iris/iris_documents/documents/toxreviews/0142tr.pdf+&cd=9&hl=en&ct=clnk&gl=us

Response: *This comment is not relevant to the contents of the PEA. Comment noted.*

Comment 15.30 - DTSC failed to investigate or include discussion on the known Organochlorine Pesticides found by Alta and Leymaster and failed to include the EPA Disposal or known Hazards of DDT and Chlordane. DTSC should not allow these soils to remain on a children’s soccer field due to the EPA identification of Chlordane known to be a serious hazard to the environment.

Response: *As previously indicated, DTSC has evaluated this Site and does not consider the site to be a health threat to adults or children and disagrees with the statement. See also Response to Comment 15.24.*

Comment 15.31 - The Avocet report fails to address and the consequences of the uncovering of the 24,000 cubic feet berm created by the imported soils, and the leaching out of these known Carcinogens.

The report fails to investigate or determine the future airborne effects and human health risks when the DDT, etc. leaches and the dry season occur. The Santa Ana winds can create an airborne horror of Carcinogenic fibers that have leached out of the berm and become airborne.

Response: *DTSC did not discuss the consequences of soil uncovering because the site does not pose a significant risk to human health as discussed in DTSC’s General Response 3. See Response to Comment 8.36 regarding dry season concern.*

Comment 15.32 - The DTSC fails to include the Ladera Linda soil contamination is unlike the typical DTSC school land contamination investigation. Unlike a district’s

attempt to build on land known to be laden with substances or naturally occurring substances that are harmful to children, in this case 85 truckloads of tainted soils were imported illegally and without permission onto a pristine children's soccer field, also used by the entire community. This is a different scenario than the DTSC clean up investigation.

Response: *DTSC's cleanup process and criteria are the same for every school district which is to ensure that the site does not pose a significant risk for users of the property. It is important to note that the Site does not contain a school, and a conservative unrestricted land use approach was taken to evaluate any potential risk.*

Comment 15.33 - AYSO did not ever need 85 truckloads of dirt to fill in the fields. Maintenance would only require 1 truckload. There is absolutely no reason to have imported this amount of soil. DTSC did not consider the precedent set if dumping is now allowed on school fields.

Many question why these soils were not simply landfilled with the other claimed home remodeling debris.

In question is what landfill would take soils with known construction debris and friable as reported by Alta Environmental.

Essentially the Ladera Linda soccer field is not a dumping ground.

Alta Report that cites at least two sources of the soils dumped upon the school field. As a school property, the DTSC needs to confirm the origin of the soils per the contract of the AYSO and PVPUSD and the continued safety of the children.

Or in the future any persons may claim a source of soil but in fact the origin is not an accepted DTSC Advisory for Clean Fill source.

Response: *This comment is not relevant to the contents of the PEA. See Response to Comment 8.22 regarding the DTSC's advisory.*

Comment 15.34 - The soils nor the process of importation do not meet the LAUSD Importation of Soils Policy and Criteria although the PVPUSD Superintendent Don Austin posted that the soils did meet that policy and criteria. This is posted in January 2016 signed also by Brent Daniels, AYSO who was in charge of the importation of these soils.

Response: *This comment is not relevant to the contents of the PEA.*

Comment 15.35. At no time did PVPUSD give permission to dump these soils (or publicly known).

At no time did the PVPUSD complete its' due diligence to test the soils and have a CA Licensed P.E. or Geologist sign off on the importation of these soils per LAUSD Policy that the PVPUSD Don Austin stated the PVPUSD had met.

At no time did Rancho Palos Verdes provide permits to the AYSO trucking company to dump soils within their city and trucking company never applied for hauling route permits. It is unknown if 85 truckloads were hauled as covered or covered and if any asbestos known to be in the debris or other harmful substances were blown into the air and left across city properties.

Response: *This comment is not relevant to the contents of the PEA.*

Comment 15.36 - LAUSD Policy states that any importation of soils onto a school property requires prior testing and any soils exceeding the laboratory limits will not be accepted.

Yet the Organochlorine Pesticides found by Alta were even higher exceedance levels by the Leymaster testing results.

No analysis of comparative exceedance levels and children's human health risks has been conducted.

Response: *This comment is not relevant to the contents of the PEA.*

Comment 15.37 - DTSC and Avocet have failed in the investigation on Ladera Linda to include the emails and warning of Alta regarding the DDT and other pesticides found by Alta.

Alta warned PVPUSD that the LAUSD policy and criteria would not accept this soil as sent to Lydia Cano, PVPUSD Deputy Superintendent in October 2015 via email from David Schak. Alta warned PVPUSD the Organochlorine Pesticide soils would not be accepted by LAUSD.

Response: *The Alta Environmental investigation results are discussed in Section 4.1.1 of the PEA Report. DTSC has determined that pesticides are not significant chemicals of concern as explained in DTSC's General Response 3. Portions of this comment are not relevant to the contents of the PEA.*

Comment 15.38 - DTSC and Avocet have failed to investigate the health consequences of exposure to children that still exist on the imported soils at Ladera Linda due to the known Carcinogens. DTSC has failed to determine or provide a human health risk for children.

Response: *DTSC disagrees with the comment. The Site does not pose a significant risk as explained in DTSC's General Response 3.*

Comment 15.39 - DTSC has failed to identify the source or origin of the imported soils. DTSC has stated that it is irrelevant. (Peter Garcia at the Community Meeting) It is quite relevant or the DTSC must change its' Policy on Clean Fill Soils Importation. Simply these soils should not have been imported, were not tested before importation, do not meet the LAUSD Policy/Criteria, do not meet the DTSC Clean Imported Fill Criteria and tests have proven that harmful substances are in these soils. The soils need to be exported as soon as possible.

Response: *This comment is not relevant to the contents of the PEA. See also General Response 1.*

Comment 15.40 - AYSO who is responsible for the solid dumped state that allegedly the soils came from a remodel of a home at 5433 Sharynne Lane. Originally the AYSO stated in an email that the soils were donated by a new home building site located at the Trump golf course property. DTSC failure to identify the origin of the soils will set a precedent for any soils to be dumped upon PVPUSD fields or RPV parks or canyons. This is unacceptable.

Response: *This comment is not relevant to the scope of the PEA described in DTSC's General Response 1.*

Comment 15.41 - DTSC, Avocet and Alta all agree that the soils came from at least two source locations.

Although Moshen Nazemi and Peter Garcia, DTSC, stated at the November 17, 2017 meeting that it is irrelevant as to the origin of the soils, it is very relevant. The community does not want any soils from any location other than a licensed clean soil company on a children's field or soils tested and known safe as stated in the DTSC Clean Fill Material Advisory.

Response: *This comment is not relevant to the contents of the PEA. Comment noted. Soils tested on site were determined not to pose a public health threat.*

Comment 15.42 - DTSC issued an 'Order to Fence and Post' dated August 1, 2016.

It should be noted that the DTSC began a criminal investigation of this case in April 2016. There is nothing that has been forthcoming to the public to change the allegations stated in the DTSC Order to Fence and Post dated August 1, 2016 stating that:

Paragraph 9: "The Site poses a public health risk should human contact occur with the hazardous substances or surrounding contaminated area."

And Asbestos was found and is known to cause cancer.

Paragraph 10: There is a likelihood of human or domestic contact at the Site because the Site is in a residential community, immediately adjacent to a soccer field where children routinely play soccer. It is also near hiking trails that are frequented by hikers and dogs.”

Citations and Test data noted in Appendix A, B and C in this DTSC document.

The Avocet report does not adequately address the recreational users or animals using this property.

EPA states that “Children’s activities often create higher personal exposures to dust, which may contain asbestos in NOA areas. The exposure of children to asbestos is of particular concern because their longer life expectancy exceeds the latency period for asbestos-related disease.” DTSC has failed to address the children’s exposure adequately.

<https://archive.epa.gov/region9/toxic/web/pdf/eldorado-asb-flyer.pdf>

Response: *With regard to the criminal investigation, please see Response to Comment 4.2. Other part of this comment is not related to the contents of the PEA.*

Comment 15.43 - DTSC has not released the testing protocol or results of the 40 samples DTSC took. DTSC has failed to provide public disclosure of the sampling.

Response: *This comment is not relevant to the contents of the PEA. The sampling was conducted as part of a criminal investigation. See Response to Comment 4.2 for more information.*

Comment 15.44 - Although the DTSC stated at the November 17th meeting in RPV that the origination of the soils is ‘irrelevant’ it is extremely relevant to the community and the residents want an answer as to the origination of the soils. That will answer many questions of the harmful substances found in the environmental investigations by Alta and Leymaster performed in November 2015, and December 2015 respectively.

Response: *This comment is not relevant to the contents of the PEA. Comment noted.*

Comment 15.45 - AYSO paid for Avocet Environmental to perform testing on soils that the AYSO Region 10 Manager Brent Daniels had dumped onto Ladera Linda children’s soccer field on April 8 and 9, 2015.

AYSO dumped the dirt to allegedly fill in holes across the field, but instead the soils were immediately compacted into a 24,000 cubic feet berm.

Although Moshen Nazemi stated on November 17th that the soils were compacted when they could not be used across the field this is not the case.

DTSC is incorrect that the soils were compacted later. The soils were immediately compacted. It appears that was the original intention although not discussed with the city of RPV and we're told not discussed with the PVPUSD.

Response: *This comment is not relevant to the contents of the PEA.*

Comment 15.46 - DTSC fails to adequately identify the endangered species in the Ladera Linda field or area. This includes but does not limit the identification and protection of the CA gnatcatcher and the Palos Verdes Blue Butterfly. The Endemic Environmental Report in Appendix does not include the Palos Verdes Blue Butterfly in the compendium.

And it does not include any investigation beyond the immediate bushes found around the berm, dumped soils site.

Species observed on the Compendium are Allen's' Hummingbird, Common Raven, Western Scrubjay, Callifornia towhee, Spotted Towhee, **California gnatcatcher**, Lesser goldfinch, House finch.

The DTSC has failed to address how the PVPUSD AYSO will protect these species. The immediately adjacent Forrestal Preserve is noted in Item 3.3.2 as "The approximately 155-acre Forrestal Nature Preserve is one often preserves (Figure 1) that collectively constitutes the Palos Verdes Nature Preserve, which is owned by the City and managed by the PVPLC. The PVPLC was established in 1988 and the Forrestal Nature Preserve was acquired in 1996. A majority of the Forrestal Nature Preserve is natural hillside with typical coastal scrub vegetation, undisturbed apart from the numerous hiking trails through it."

DTSC has failed to adequately identify any/all scrub vegetation adjacent to the Ladera Linda field and any/all wildlife that may be affected by the imported soil and disturbance to the environment.

The Ladera Linda field and Forrestal Preserve are considered in data set maps as the: **"Final Critical Habitat for Coastal California Gnatcatcher (*Polioptila californica californica*)" by the U.S. Fish and Wildlife Service.**

Upon the dumping of the 85 truckloads of soil upon the scrub bush and sage, the AYSO destroyed this precious habitat. One can see the crushed bushes and habitat on imagery.

Please provide how the AYSO intends to reestablish the habitat and rebuild the nesting for these protected species. The Ecological Evaluation noted the CA Gnatcatcher. This report does not provide the protected Rancho Palos Verdes land on area maps that includes Ladera Linda for the identified species and wildlife protection.

Response: *Prior to conducting the PEA investigation, a qualified biologist surveyed the site and did not observe any bird nesting activities or locate any nest; as a result, the Project did not cause any significant impact to the ecological receptors as described in DTSC's General Response 4. No habitat re-establishment or nesting rebuilding is needed for the Site. DTSC evaluated the information presented, and the site conditions and determined that there are no hazards to ecological receptors.*

Comment 15.47 - DTSC has not adequately addressed the storm water pattern or the mudslides that may occur. Field is known to be flooded every year. The RWQCB should be commenting on this problem. This agency was either not contacted or comments not public.

Response: *The Site does not pose a significant risk to human health and the environment as described in DTSC's General Responses 3 and 4. The Site is not a source of hazardous substance contamination with respect to storm water.*

Comment 15.48 - DTSC has not addressed the NPDES compliance when this water with Organochlorine Pesticides flows into the ocean. Storm water flow was not adequately addressed in the DTSC/Avocet Report.

Response: *NPDES regulations are not pertinent to the PEA.*

Comment 15.49 - California Proposition 65 identify DDT and Chlordane as Carcinogens. DTSC did not address at all this California law and how it affects this school property. This field is leased to other businesses and is not exempt from Prop. 65 since there are known Carcinogenic substances found in the soils dumped upon the field. Signs need to be posted per Prop. 65 regulations.

Response: *DTSC disagrees with this comment. Proposition 65 warnings are not applicable at this Site.*

Comment 15.50 - This report failed to test the air quality in the neighboring streets as comparison data. The air tests at the field during trenching were wet down and the effect on the dust on exposure compared to any real use of the field will not be known when the field is not wetted down.

Without a background air test of nearby streets to compare to the field it is not known what the actual asbestos or any other contaminants may be on Ladera Linda compared to the community. This air testing of nearby streets should have been included in the study.

Response: *The Site does not pose a significant risk to human health and the environment, therefore, a comparison study is not warranted. See also Response to Comment 8.36 for dust exposure in dry days.*

Comment 15.51 - Would you please provide the names or titles of the landfills in Los Angeles County that would accept the soils imported to Ladera Linda in April 2015.

At the community meeting on November 17, 2017 you stated that any landfill would accept this soil. I am unfamiliar with these sites.

I would appreciate names of the specific landfills that you were referencing.

Response: See *Response to Comment 8.25*.

Comment 15.52 - Howard Spielman's P.E. License was cancelled as of 2006. Registered Environmental Health Specialist (REHS) was cancelled in 2011.

Yet PVPUSD attorney Terry Tao hired Spielman of Health Science Associates in May 2016 and Spielman performed duties for the PVPUSD as if he was a licensed P.E. or California license geologist in July 2016. He is neither.

In the video that PVPUSD that I hope you have the opportunity to watch Spielman makes assertions that are simply false; he picks up soils without any knowledge to their content and throws them onto the ground; he unravels a plastic tarp that is ordered by AQMD as Notice to Comply without any attention to that governmental order. Then Spielman, Superintendent Don Austin, and Terry Tao, Attorney, walk across the unprotected berm of soils of unknown origin.

Any sampling that Howard Spielman did that day in July by picking up evidence without AQMD permission should be unacceptable in any DTSC or Avocet report. His assertion that he had such licenses and that he signed as such with an attorney's agreement seems appropriate for a new investigation into that fiasco.

Public funds were used for Spielman's contract and I am requesting as a public request his contract, his payment for services and any/all documents that were signed by Spielman, PVPUSD and Atkinson, Andelson Law Firm and/or by Terry Tao.

Response: See *DTSC's General Response 5 regarding samples taken by the Health Sciences Associates*.

Comment 15.53 - This has come to my attention and needs your immediate attention. The Avocet Report is basing a critical conclusion that Avocet understands' dumping was granted permission by PVPUSD.

This is not factually correct.

DTSC is a California regulatory agency and needs to take appropriate actions when an Official PEA report as recently released by Avocet with your confirmation is totally inaccurate as to why 85 truckloads of man-made materials were dumped upon a

children's soccer field without any permission by the land owners PVPUSD, the city in which it sits, or the homes association.

There is a distinct contradiction of the statements in this Avocet Report vs. the facts as stated to the public.

The Avocet report claims that it understands that the PVPUSD gave its "permission" to dump the 85 truckloads of dirt onto Ladera Linda.

Page 12 of the Avocet Report. (see below)

And then Avocet goes on to state that "later on" the soils were leveled.

This is simply not true.

If Avocet has such signed official documentation to confirm their statements of "understanding" that PVPUSD gave permission to dump 85 truckloads of soil please provide that written document with title of such persons and their signature.

Please provide the signed Avocet document stating the date that AYSO claims to have compacted the soils at Ladera Linda with receipts of such workmanship.

The knowledge or no knowledge of dumping has been the crux of the DTSC investigation.

The word "understands" is vague and not officially a confirmation of fact in any official document.

This Avocet Report is an official DTSC signed document.

The facts or statements made in this report need to be factual and confirmed as the truth.

PVPUSD and the entire School Board has denied any knowledge of this dumping since day one. Stated at official board meetings.

Stated in newspaper articles.

At the July 13, 2016 PVPUSD Board Meeting Superintendent Don Austin stated that he didn't even know PVPUSD owned any soccer fields and had no knowledge of the dumping.

On September 9, 2015 PVPUSD Board Meeting the Deputy Superintendent Lydia Cano stated that there were only 3 small piles of dirt at Ladera Linda for Edison. She gave no indication that the soils seen were for AYSO.

She had no knowledge of any AYSO 85 truckloads of dumped soils.

In November 2015, PVPUSD Director of Maintenance, Louie Hubbert either resigned or was fired when the Alta Environmental results were sent to the district. Why did he leave?

The PVPUSD withheld the Alta test results from the public for 6 months. Why?

March 26, 2015 Austin signed an agreement with AYSO to use Ladera Linda as stated and voted upon at the PVPUSD Board meeting.

Agenda for March 26, 2015:

"Item Q.3.a. License Agreement Between Palos Verdes Peninsula Unified School District and American Youth Soccer Organization (AYSO) for the Use of Property, Maintenance and Improvements"

Therefore Superintendent Austin did have knowledge that PVPUSD did have soccer fields and a contract between AYSO and PVPUSD existed.

Yet his statements of no knowledge of PVPUSD owning any Ladera Linda soccer fields and denial of any soil dumping were clear at the July 13, 2016 board meeting.

Was his knowledge of the dumping an 'error of omission' on July 13, 2016?

The Avocet Report states on Page 12 that PVPUSD gave permission and only after complaints were lodged did the AYSO leveled the dirt out-

This is simply not true, and whomever gave Avocet that information should be sworn in for such testimony and that testimony should be publicly available.

The dirt was leveled out on April 9, 2015 the second day of dumping and not later on, as witnessed by a resident who took a photo below of the equipment used to level it.

This is the Avocet statement on Page 12 of Avocet/DTSC Report:

- On April 8 and 9, 2015, approximately 1,020 cubic yards of soil from grading operations at a residential property in Torrance (Section 3.2.3) were imported and end-dumped at the Site. Avocet understands that PV AYSO obtained PVPUSD's approval prior to importing the Torrance soil and that a PVPUSD representative inspected the soil beforehand. Moreover, PVPUSD used approximately ten truckloads of the same soil for its own purposes, albeit not in the vicinity of Ladera Linda Fields.
- After receiving complaints, PVPUSD asked PV AYSO to level the end-dumped stockpiles at the Site later in April 2015. Avocet understands that the end-dumped stockpiles were simply flattened out, with little if any mixing of the Torrance soil with the previously imported Ocean Field soil, which reportedly had developed a "heavy" vegetative cover.

A resident of Ladera Linda was there and wrote "Photo was indeed taken 4/9/15. Original is attached, no way to make out license plate.

Don Austin continues to provide factually incorrect details. In the timing of events he gave at a recent school board meeting, he stated that the soil was delivered on the 8th and 9th, and that later in April it was spread out and leveled after they started hearing complaints from residents. The truth is that the front end loader was delivered to the site on April 9th and started leveling the dirt that morning – I saw it but unfortunately did not capture actual images while leveling was occurring."

He did, however, have the photo below of the equipment used and the white car present.

Until the factually correct statements of events is stated in the DTSC and AQMD open investigation this case or determination of this case should not be finalized or closed. A determination of responsibility is necessary to draw conclusions.

Therefore, it's essential to the DTSC Report to be factually correct.

The word "understands" cannot be used to base a regulatory report.

This photo attached was taken on April 9, 2015 while the AYSO was immediately compacting the dumped dirt.

Why? And with whose permission?

Someone is not telling the whole story or the truth.

And the public deserves the truth.

The public has the right to know.

Last year the PVPUSD was found in violation of not having an Integrated Pest Management Policy.

Now we come to find out that man made pesticides were dumped upon a school field. There is no known CA or PVPUSD policy that allows for man made pesticides such as DDT and Chlordane to be dumped upon a children's soccer field. But these soils and pesticides are now stockpiled upon Ladera Linda field.

The PVPUSD has spent a fortune of public funds denying any knowledge using attorneys and environmental firms. Is this a misuse of Public Funds?

If indeed they PVPUSD did have knowledge why was such knowledge denied at official meetings?

Here is an email obtained by the public records act by me, between then Board President Larry Vanden Bos, also a AYSO Region 10 Commissioner- and Don Austin, Superintendent.

Did Don Austin, PVPUSD, thus have knowledge as implied in this email, and yet denied this to the public in official meetings?

It seems that Board President Larry Vanden Bos does imply this knowledge in the email below:

Response: *This comment is not relevant to the purpose, contents and focus of the PEA. Any information provided as background was not used to make a final determination on the merits of the PEA. See also DTSC's General Response 1*

Comment 15.54 - The DTSC/Avocet report does not adequately characterize or investigate the Ecological Screening in its evaluation of the Ladera Linda site that is immediately adjacent to the Forrestal Preserve.

The Ladera Linda site and adjacent Forrestal Preserve is a protected zone for the California Gnatcatcher.

The Avocet report does not do a complete investigation of Ladera Linda site or the known Critical Habitat for the CA Gnatcatcher at Ladera Linda or adjacent Forrestal Preserve.

This Report did not address the Forrestal Preserve, the known CA Gnatcatcher habitat or destruction or affects of the imported dumped soils or future affects of the possible destruction of the habitat from the dumped imported soils and the leaching out of the known Organochlorine Pesticides on this protected species or other chemical or man made materials dumped at the site.

The PEA Guidance Manual states the DTSC shall identify the protected areas within 1 mile. The Avocet report gives Ladera Linda a cursory review, if that.

The Report did not adequately characterize or investigate the wildlife or habitat of the entire area or surrounding preserve.

PEA Guidance states:

" The location of all wildlife areas, preserves, reserves, sanctuaries, parks, natural areas, conservation areas, or other protected areas within 1 mile of the site should be identified."

Most importantly the DTSC PEA Guidance states below all the items that the Avocet Report did not do:

The approach used in the screening-level ecological evaluation is to identify potentially complete exposure pathways between the areas of contamination and biota which occupy or potentially could occupy the site in the future, or habitats outside of the site boundary that could potentially be affected by contamination from the site. If there are potentially complete exposure pathways, further site investigation and assessment may be warranted.

And also states:

The PEA should contain a table listing all detected chemical contaminants, with maximum and minimum concentrations, number of samples collected and number of detections, as well as any information on the specific habitats present where the contaminants were detected.

These statements are taken from the DTSC PEA Guidance;

http://www.dtsc.ca.gov/PublicationsForms/upload/PEA_Guidance_Manual.pdf

The U.S. Fish and Wildlife Service identifies the Ladera Linda site and immediately adjacent Forrestral Preserve as Final Critical Habitat for the CA Gnatcatcher- This was not addressed in the Avocet Report.

[Final Critical Habitat for Coastal California Gnatcatcher \(*Polioptila californica californica*\) | Data Basin](#)

Response: Please see DTSC's General Response 4 regarding the ecological screening evaluation.

The PEA Investigation did not detect any asbestos fibers in soil or reveal any friable asbestos containing materials.

With regards to the chemicals detected in soil, the results are described in the PEA Report, Section 4.0.

Soil analytical data were non-detect, below screening levels or at levels that are not considered to be an environmental, ecological or public health threat.

Comment 15.55 - Item 4.1.5, Page 24: Avocet Investigation September 2016. Avocet collected only 9 surficial soil samples from a 24,000 cubic feet Berm to conclude that there were only trace concentrations of Organochlorine Pesticides. Avocet has disregarded the Alta and Leymaster Reports and sample test data to make conclusive determinations that there are only trace concentrations.

Alta and Leymaster Reports both found considerably high levels of Organochlorine Pesticides, and at levels that LAUSD would never accept as import soils.

Avocet's conclusions cannot be accepted as trace concentrations using only 9 surficial samples, five from the border and 4 from the field.

In determining the HHRA for young children further investigation is required.

Response: *DTSC did not rely on only nine samples taken by the Avocet in 2016. DTSC has considered all past investigation results, including Alta and Leymaster investigation results, to make the determination that no further investigation is needed for the Site. Please see DTSC's General Response 3 for the organochlorine pesticides detected at the Site and DTSC's determination that the site does not pose a significant risk to the human health.*

Comment 15.56 - DTSC PEA Manual, Preface:

"Specific requirements of the PEA that are not typically required for these other types of investigations include the site-specific human health and ecological screening evaluations, public participation requirements, data collection, and scoping activities."

Although the DTSC approves the Avocet report and conclusions paid for by the AYSO who is the responsible party and who imported/dumped the 85 truckloads of soils onto the Ladera Linda field, the DTSC itself did not conduct the investigation or sampling results.

Response: *Comment noted. As stated in the comment, DTSC did not take any samples specifically for or during the PEA investigation but as stated in response to comment 15.55, evaluated other information available from previous investigations results and provided oversight for the PEA investigation.*

Comment 15.57 - PEA Manual, Preface. These soils were not tested prior to dumping nor were they signed for by a P.E. or approved licensed CA professional.

Response: *Comment is not relevant to the purpose, contents or focus of the PEA investigation.*

Comment 15.58 - PEA Manual, Preface. The DTSC did however take 40 samples for the Criminal investigation and has not made those test findings public.

Response: *Please see Response to Comment 4.2 for the information relevant to criminal investigation.*

Comment 15.59 - PEA Manual, Preface. The DTSC had minimal public participation holding 1 public meeting after the investigation took place. Despite residents' requests for additional participation, DTSC denied such inclusion.

Response: *DTSC disagrees with Commenter's assertion. DTSC has conducted extensive public participation outreach given the fact that this is a no-further-action PEA. See also DTSC's General Response 2.*

Comment 15.60 – PEA Manual, Page 1. The PEA did not adequately investigate the protected species, wildlife and habitat immediately adjacent to Ladera Linda aka Forrestal Preserve.

Furthermore, the PEA did not acknowledge or investigate the federally protective lands in Rancho Palos Verdes by the U.S. Fish and Wildlife Service.

The PEA did not use all appropriate inquiries (AAI) in the process of evaluating the property.

Response: *Please see DTSC's General Response 4 regarding the ecological screening evaluation conducted at the Site. The federally preserved lands in Ranch Palos Verdes in shown in the PEA Report, Figure 1.*

Also, please note that AAI is not applicable to the PEA process.

Comment 15.61 – PEA Manual Page 2, Section 1.2. The DTSC did not adequately address the release of hazardous wastes/substances/materials at the Ladera Linda site. That would include but not be limited to the endangered and protected wildlife/species/habitat within 1 mile of the site.

Response: *The discussion of the Ecological Screening Evaluation is found in the PEA Report, Section 8.0. Please see DTSC's General Response 4 for further information regarding the Site's ecological screening evaluation.*

Comment 15.62 - PEA Manual Page 2, Section 1.2. DTSC did not adequately provide information to the community and dismissed the public participation needs of the community.

The DTSC did not engage or attempt to contact the parents and community that use the field of the entire Peninsula.

Response: *DTSC has conducted extensive public participation outreach given the fact that this is a no-further-action PEA. DTSC had provided adequate information to the community and contacted the community as described in DTSC's General Comment 2.*

Comment 15.63 - PEA Manual Page 2, Section 1.2. DTSC has failed to acknowledge that this site is unique. The Organochlorine Pesticides trucked onto a children's playing field includes levels of DDT, Chlordane, etc that exceed laboratory limits. DTSC does not acknowledge that the LAUSD would not accept this soil.

Response: See Response to Comments 15.20 and 15.24.

Comment 15.64 - PEA Manual Page 2, Section 1.2. DTSC did not include other state or county agencies for assessment purposes. This would include any/all oversight agencies for pesticides and school properties.

Response: Compliance with SCAQMD' and DTSC's regulations is discussed in the PEA Report Section 4.2. DTSC has consulted the SCAQMD for the PEA investigations.

Comment 15.65 – PEA Manual, Section 1.3., Page 4. DTSC has been provided with information of great significance regarding the protected wildlife and habitat of the area. Additional investigations into the safety and harm to this area, whether past or future, needs further investigation.

Possible harm occurred to the protected habitat and wildlife by the dumping of these soils.

Response: The Site does not pose any risk to ecological receptor as described in DTSC's General Response 4 and no additional investigation is needed for the Site.

Comment 15.66 – PEA Manual, Page 6. DTSC did not contact any parents that are AYSO members whose children use the fields several days a week. They were not included on the mailing lists or notified in any manner. Or for that matter no one was notified by the DTSC beyond the Ladera Linda borders even though the entire community uses the site.

Response: DTSC has conducted extensive public participation outreach given the fact that this is a no-further-action PEA. DTSC has contacted the community as described in DTSC's General Response 2.

Comment 15.67 - PEA Manual, Page 6. No scoping meeting was held as recommended in the PEA Guidance. The July 19th meeting was cancelled by DTSC.

Response: The scoping meeting was held on November 2, 2016 with the Respondents PVPUSD and AYSO and their consultants as recommended in the PEA Guidance Manual, Section 2.1.1.

Regarding the public outreach, the July 19th meeting was cancelled because DTSC's did not have any additional information to the community as explained by DTSC in the November 16, 2016 public meeting.

Comment 15.68 – PEA Manual, Page 6, Ecological Screening. DTSC did not conduct an adequate review and investigation of the protect wildlife and habitat in the Ladera Linda area. There needs to be a further investigation and characterization of the site.

Response: *See DTSC's General Response 4.*

Comment 15.69 – PEA Manual, Page 8, Sections 2.1. and 2.1.1. There was no Scoping Meeting for the community. Please provide the project mangers rationale for not having such a meeting.

Response: *See Response to Comment 15.67.*

Comment 15.70 – PEA Manual, Section 2.1.1. Please provide the DTSC staff as stated above who completed the PEA, specifically the geologist, toxicologist, safety and health professionals, etc. and their specific role in the Ladera Linda investigation. Qualified licensed DTSC professional staff members were not provided.

Response: *The PEA Report requires the preparer of the report to be identified. DTSC is the regulatory agency.*

Comment 15.71 – PEA Manual Section 2.2. The Rancho Palos Verdes City has approved a \$7 Million dollar community center immediately adjacent to the Ladera Linda site. There was no analysis on the new project.

Response: *The analysis of the new project (community center adjacent the Site) is not within the project scope of the PEA.*

Comment 15.72 – PEA Manual, Section 2.1.2. DTSC did not adequately address or investigate the risks to children, environment, wildlife and habitat in the CSM. The site conditions, adjacent Preserves and the impacts to the receptors was not adequately investigated.

This CSM did not investigate the historic weather conditions of the site in winter or summer.

In winter the field is flooded and in the summer the airborne borne leached materials will become airborne. The young children playing on the field will be exposed by wet fields and leached substances onto the field mixed with the water.

The summer will dry out the leached substances and they will become airborne. The investigation did not analyze these children's exposure pathway.

The Report did not adequately analyze regulatory status or protection of the site and adjacent sites including but not limited to the Federal U.S. Critical Habitat for the CA Gnatcatcher; the Ladera Linda site location uphill or extreme slope of property and residential downhill below where flows will occur.

Possible runoff and mud substances to the Ladera Linda Community Center, and homes below.

The Report had lots of maps but failed to interview 1 resident on the field conditions as they've lived through them.

The PVPUSD email stated by Lydia Cano said the mud will flow downhill. Towards the homes or community center? See November 6, 2015 email.

Response: *The regulatory status of the Site is described in the PEA Report, Section 4.2, Ecological Screening Evaluation is discussed in the PEA Report, Section 8.0, and stormwater run-off is discussed in the PEA Report Section 5.3.*

See Response to Comment 8.36 for weather concerns.

See DTSC's General Response 2 for public participation activities conducted for this project.

Please also see DTSC's General Responses 3 and 4 for further information related to the CSM, risks to children, environment, wildlife and habitat.

Comment 15.73 - PEA Manual Page 5, Section 2.2. Potential for known flooded fields now affect pollutants unknown to the residents and recreational users has not been analyzed.

Response: *The stockpiled soil at the Site does not pose a significant risk to the human health as described in DTSC's General Response 3.*

Comment 15.74 - Not one person in Ladera Linda or community was interviewed. Without these personal interviews the DTSC simply does not have this first hand knowledge or accurate information.

The DTSC needs further evidence on the weather conditions at the site and the effect of any releases caused by the imported soils and known soil substances.

Response: *DTSC conducted public participation activities as described in DTSC's General Response 2.*

The detected chemical at the Site does not pose a significant risk to the human health as described in DTSC's General Response 3; therefore, the weather

condition is not a factor to be considered for the Site as described in Response to Comment 8.36.

Comment 15.75 - PEA Manual. Section 2.2.1., Record Review. Investigation regarding the Records Review was not adequate. National Pollutant Discharge Elimination System (NPDES) was not addressed.

Response: *See Response to Comment 15.48.*

Comment 15.76 – PEA Manual Section 2.1.2., Site Owner/Operator record. It is unclear if the DTSC inspected the total records of the Ladera Linda Field.

The fact that the field was part of the Livingston Mine and used by Rancho Palos Verdes as recreational site has not been adequately analyzed.

It has not been investigated as the AYSO use as the contracting agent to the PVPUSD and what persons or operators trucked the 85 truckloads of imported soils.

Response: *The project scope is to investigate the imported soil as described in DTSC's General Response 1 and DTSC has reviewed all available documents related to the project scope.*

Comment 15.77 – PEA Manual, Page 16: 2.2.1. The Avocet Report did not adequately investigate the Forrestal Preserve and/or the Portuguese Bend Reserve both within the Critical Habitat of the CA Gnatcatcher as designated by the U.S. Fish and Wildlife Service.

Nor did the Avocet Report investigate the unique geologic features of the site or surrounding area.

Response: *The investigation of the Forrestal Preserve, Portuguese Bend Reserve and/or surrounding area is not necessary since the Site does not pose a significant risk to human health and the environment based on the PEA investigation results.*

Comment 15.78 – PEA Manual, Pages 17 and 18, Sections 2.2.3 and 2.3. There were no interviews with any Rancho Palos Verdes community member.

There was no public participation in the entire DTSC investigation. It is not sufficient to send out 1 notice to some Ladera Linda residents and hold 1 meeting after the investigation and conclude that the public has been involved in the investigation.

There was a very high interest by the community in Ladera Linda site as made clear by the DTSC

Investigation was conducted by special agenda items by the RPV council meetings; by the PVPUSD Board meeting agendas, news articles, etc. However, there was no additional community outreach by the DTSC.

Response: *DTSC has conducted extensive public participation outreach given the fact that this is a no-further-action PEA. DTSC disagrees with this comment. See DTSC's General Response 2.*

Comment 15.79 - PEA Manual, Pages 22 -24, Sections 2.4.2 (Sampling Strategy) and 2.4.2.1 (Soil Sampling-Vadose Zone). The DTSC Report and investigation did not adequately analyze the nature of the contaminants as clearly reflected by Avocet's statement that there was only trace concentrations of organochlorine pesticides when in fact Avocet only took 9 surficial samples of their own for lab analysis. No soil vapor tests were conducted.

The biased sampling completed by Avocet did not include any Vadose Zone testing.

This was despite the fact that benzene was found at the site and further investigation and testing is necessary to determine no further action.

Response: *The vadose zone testing is required if there were suspected releases of volatile organic compounds (VOCs). Based on the former soil investigations, benzene was detected below the screening levels. DTSC has determined that VOCs are not chemicals of concern at the Site and vadose zone testing is not required.*

Comment 15.80 – PEA Manual, Section 2.5.4.6. The Avocet Report and DTSC did not test or use local background air data to compare air sample testing and data at Ladera Linda. Background samples were not taken for each medium.

DTSC did not adequately test the background air as comparison data to ensure human health risks at the Ladera Linda site for children, adults or recreational users and pets.

None of the DTSC documents and strategies as written in Footnotes were adequately applied in assessment of the Ladera Linda Field.

Response: *Air background samples are not needed for the Site since there are no asbestos fibers detected in the soil and air samples. In addition, DTSC uses screening levels for detected chemicals to determine the potential risk for the Site. See DTSC's General Response 3.*

Comment 15.81 – PEA Manual, Sections 2.5.2.2., 2.5.3. and 2.4.4. DTSC did not consider the regulatory requirements and applicability land disposal when in fact the 85 truckloads imported onto Ladera Linda were disposed of onto Ladera Linda children's soccer field. All disposal restrictions have been ignored.

DTSC did not contact or investigate the Department of Fish and Wildlife (DFW) protected preserves and lands within the Rancho Palos Verdes borders that abut the Ladera Linda field. Ladera Linda sits within that Critical California Gnatcatcher Protected Land Zone. This has not been adequately investigated.

Response: See DTSC's General Response 1. Land disposal restrictions of 85 truck loads of imported soil is not within the project scope.

With regard to contacting DFW, see DTSC's General Response 4. This information was also discussed in the PEA Report, Section 8.0. DTSC has performed the ecological risk evaluation and concluded that the site does not pose a significant risk to ecological receptors as described in DTSC's General Response 4.

Comment 15.82 - PEA Manual, Section 2.5.1. The Ladera Linda field site is within the Critical Habitat of the CA Gnatcatcher and the adjoining preserves are identified as protected wildlife and habitat.

The DTSC/Avocet Report did not investigate or analyze the Critical Habitat areas.

The Alta Soil Sampling Analytical Results do not list Office of Environmental Health Hazard Assessment (OEHHA) Screening Levels (SLs) for all test results.

The project manager did not consult with community.

Response: See DTSC's General Response 4 regarding the ecological screening evaluation.

With regard to the Alta Soil Sampling Analytical Results, DTSC has evaluated the results and compared them to the screening levels as described in DTSC's General Response 3. The OEHHA screening levels were not used for DTSC's determination; therefore, listing OEHHA SL's is not a critical factor for DTSC's determination.

Please note that the community was consulted as part of the DTSC's public participation activities described in DTSC's General Response 2.

Comment 15.83 – PEA Manual Sections 2.5.2.1 and 2.5.2.2. DTSC did not adequately investigate the use of the field, the children's exposure to soil ingestions and dermal absorption of the imported soils or exposure to airborne dust.

Response: DTSC has used the residential (unrestricted land use) screening levels regardless of the current use and zoning for the site as described in DTSC's General Response 3. The exposure to soil ingestion and dermal absorption are not the potential exposure routes as described in PEA Report Section 7.1.

Comment 15.84 – PEA Manual, Sections 2.5.4.3. and 2.5.4.4. Organochlorine Pesticides that exceed the laboratory limits and found in soils at Ladera Linda by Alta and Leymaster Environmental were not investigated for the Critical Habitat and Wildlife Preserves that surround Ladera Linda.

Pesticides bioaccumulate and potential affects to the critical habitat and wildlife preserve and protected lands that Ladera Linda sits within and immediately adjacent to were not analyzed. DTSC did not investigate the bioaccumulative chemicals imported onto the soils at Ladera Linda.

Response: Please see DTSC's General Response 4 with regard to ecological receptors.

Comment 15.85 – PEA Manual, Section 2.5.3. On December 6, 2017 Yolanda Garza responded to my email requesting the screening level for Asbestos. Yolanda replied: "In response to your request for soil screening levels for asbestos, neither DTSC nor US EPA have established soil screening levels for asbestos"

This confirms the statement in the Avocet Report Item 7.2 that there are no EPA or DTSC screening levels for Asbestos. In the PEA Report, it was written "Regardless, of these screening criteria, however, a quantitative HHSE is not possible as no friable asbestos has been confirmed and, thus, there are no complete exposure pathways."

There is no 'regardless' in a human health risk assessment.

The Avocet report cannot quantify any of the human health risks in their report. Therefore, further investigation in mandated.

And in fact, the EPA states there is no safe exposure for Asbestos.

Reviewing the Avocet Asbestos air borne sample results you will note that the tests did find Asbestos fibers. The test results were all not ND. Therefore, there are airborne Asbestos fibers at Ladera Linda.

The Risk Characterization does not investigate or analyze this critical factor. The airborne test results do show Asbestos fibers and DTSC cannot conclude that there are no Asbestos health risks when in fact airborne test results prove otherwise.

All Asbestos found in debris was not Naturally Occurring Asbestos. It was imported onto the site in April 2015.

Response: DTSC did not use screening levels for asbestos fibers. There were no asbestos fibers detected in soil and air samples. In the absence of asbestos fibers, risk quantification was not necessary.

Comment 15.86 - There is no way that the Cumulative Cancer Risk can be calculated since the EPA and DTSC do not have screening levels for Asbestos.

There is no way, as stated in the Avocet report Item 10.1, to quantify the the human health risks in the Report.

The DTSC cannot calculate or guarantee any of the conclusive determinations in this Report.

Response: *DTSC did not calculate the risk associated with asbestos using screening levels or cumulative cancer risk. Asbestos fibers were not detected in the soil and air samples, and therefore a risk calculation was not necessary.*

Comment 15.87 – PEA Manual, Section 2.5.4.1. The soil and air/risk hazards estimates were not calculated for the Critical Habitat and wildlife within and adjacent to and with the 1-Mile radius as required in the PEA.

Response: *See DTSC's General response 4 for risk/hazard screening evaluation for ecological receptors.*

Comment 15.88 - PEA Manual Section 2.5.4.1. The DTSC did not include any characterization or investigation of risk calculation for children's exposure. The Avocet report did not include the 'incidental' soil ingestion exposure for a child. The majority of time the Ladera Linda field is occupied by children ages 4-11 years old. Other times parents visiting with young children crawl onto the fields. Ingestion of such soils is a real hazard that has not been investigated or characterized.

Response: *The Site does not pose a significant risk to receptors including children since there are no asbestos fibers detected in the soil and other chemicals were detected at levels that do not pose a significant risk to human health (both adults and children) as described in DTSC's General Response 3. Soil ingestion is not a concern for the project.*

Comment 15.89 - PEA Manual, Section 3.2.4.7. There were no interviews for any community members or parents whose children are directly affected and exposed.

Response: *DTSC has conducted extensive public participation outreach given the fact that this is a no-further-action PEA. DTSC contacted the members of the public as described in DTSC's General Response 2.*

Comment 15.90 - The Avocet Report and DTSC has not adequately investigated, calculated or investigated the fugitive dust exposure for children at Ladera Linda field.

The imported soils are known to have pesticides that exceed the LAUSD import soils policies and criteria. The imported soils are known to have asbestos debris.

The Air Pathway has not been adequately investigated.

Response: *Pesticides were detected below the screening levels which do not pose a significant risk to human health as described in DTSC's General Response 3.*

Comment 15.91 - PEA Section 2.5.4.5.1. There has been no investigation by DTSC to determine the human health exposure of Particulate Matter at Ladera Linda field. The extreme Santa Ana winds and ocean winds are known to exist at the Ladera Linda fields, and any airborne particulate matter carrying contaminants will lodge into the lungs of the young children. The human health risks associated with the particulate matter has not been calculated or adequately analyzed.

Response: *The soil does not pose a significant risk to human health as described in DTSC's General Response 3; therefore, airborne particulate matter will not carry contaminants that pose a significant risk to human health.*

Comment 15.92 - PEA Manual, Section 2.6. DTSC and Avocet Report did not include, investigate, or analyze the Critical Habitat of the CA Gnatcatcher on preserves surrounding Ladera Linda site and no analysis was done. DTSC did not adequately analyze or investigate the habitat or wildlife on the total Ladera Linda site.

In fact, the DTSC did not consider the destruction of the protected wildlife or habitat on the Ladera Linda site when 85 truckloads of soils from unknown origin were dumped onto the field in April 2015.

The destruction and remediation at the site needs to be inclusive of further studies. None of the items below from the PEA Manual were adequately investigated in the Avocet Report. And no evaluation to identify complete pathways present or future.
(text pasted below – See Comment 15. 93 to 15.103)

Response: *An ecological screening evaluation was performed by DTSC and described in DTSC's General Response 4.*

Comment 15.93 - "2.6.2 BIOLOGICAL CHARACTERIZATION"

The Avocet Report and DTSC did not include or attempt to include any surveys or known Rancho Palos Verdes or PVP Land Conservancy Comprehensive Monitoring Reports of the Preserves surrounding and including the Ladera Linda site.

Further investigation, analysis, and characterization is warranted to protect the wildlife and habitat of the U.S. Fish and Wildlife Service.

The Report did not include the ecological receptors and exposure routes such as direct, inhalation of air, or indirect, such as dietary contamination or dermal contact.

Report did not include the exposure route analysis now or in the future for each habitat type.

Response: See DTSC General Response 4.

Comment 15.94 - 2.6.4 QUALITATIVE SUMMARY

The Report did not include a site wide habitat map as required as part of the ecological screening. Location of 'waste piles' was not noted, but please note that the entire importation of 24,000 cubic feet is the waste pile.

Report did not identify with a map to portray habitat specific information.

Response: A map showing the Forrestal Nature Reserve is found in the PEA Report, Figures 1 and 2. The location of the Forrestal Nature Reserve is also discussed in the PEA Report, Section 3.3.2.

The location of the imported soil is found in the PEA Report, Figure 6. The extent of the imported soil is shown in PEA Report, Figure 9.

Comment 15.95 - "2.8 COMMONLY KNOWN OR REASONABLY ASCERTAINABLE INFORMATION"

The Avocet Report did not include nor did the DTSC provide for the public ascertainable information found in Rancho Palos Verdes documents on the Ladera Linda field.

No information was sought through interview of local residents who have great knowledge of the field or from the city records or from the PVP Land Conservancy that oversees the Preserves adjoining the entire field.

Response: The commonly known or reasonable ascertainable information about the Site is provided in the PEA Report, Sections 1.0 to 4.0.

Community concerns regarding the imported soil was also discussed in the PEA Report, Sections 3.0 and 4.0.

**Comment 15.96 - "PREPARATION OF THE PEA REPORT"
"3.2.4.2 HAZARDOUS MATERIAL/SUBSTANCE/WASTE MANAGEMENT INFORMATION"**

2) "Onsite Storage, Treatment, and Disposal:"

The Avocet does not acknowledge that the onsite disposal is the 85 truckloads of imported soils from unknown origin. And without that dumping of soils, this report would not be necessary.

Report does not acknowledge the origin of the soils that caused the high levels of DDT, Chlordane and other Organochlorine Pesticides in the contents.

Report does not identify any future containment measures in any description or inclusion or future issues.

Response: *The PEA Report, Section 4.0 clearly describes the potential concerns associated with the imported soil and detection of organochlorine pesticides in the imported soil.*

The PEA Report does not identify any future containment measures because no further action is recommended based on the sampling results.

Comment 15.97 - PREPARATION OF THE PEA REPORT”
“3.2.4.2 HAZARDOUS MATERIAL/SUBSTANCE/WASTE MANAGEMENT INFORMATION”

3) “Regulatory Status:”

Avocet does not acknowledge that the city of Rancho Palos Verdes can enforce their codes and ordinance at the Ladera Linda field. Report does not include other regulatory compliance such as the NPDES and other county, state, federal oversight.

There were no interviews of any community member, contrary to the DTSC public participation policy.

Response: *The Regulatory status of the Site is discussed in the PEA Report, Section 4.2 which discusses the compliance with SCAQMD’s and DTSC’s regulations. Compliance with NPDES is not relevant to the PEA as discussed in Response to Comment 15.48. DTSC has conducted extensive public participation outreach given the fact that this is a no-further-action PEA. Also see DTSC’s General Response 2 related to public participation.*

Comment 15.98 - “3.2.6.2 FACTORS RELATED TO SOIL PATHWAYS”

The Avocet report and DTSC did not analyze or investigate the local and adjacent Ladera Linda community center and its’ children facility for classes and programs.

Response: *Investigation of the community center is not needed since the Site does not pose a significant risk to human health as described in DTSC’s General Response 3.*

Comment 15.99 - “3.2.6.4 FACTORS RELATED TO AIR PATHWAYS”

Avocet did not include or analyze the following:

- did not provide the daily prevailing wind direction or velocity.
- wind patterns
- local climatic factors
- possible dispersion routes
- distance to local children's classes at the community center
- distance to protected habitat/preserve

Response: *Factors related to air pathways are discussed in the PEA Report, Section 5.4, which states that the potential air exposure pathways was eliminated by fencing the site and covering the levelled imported soil stockpile while the PEA investigation is being conducted. As a result, Section 5.4. no longer discusses those factors cited in the comment since they are no longer factors to be considered for the air pathway.*

Comment 15.100 - "3.2.12.2 RECOMMENDATIONS"

"removing highly contaminated soils to prevent further migration; placing a polymer coating onto soils to prevent dispersion and runoff"

The Avocet Report did not, but must include any future containment plans. The imported soils sitting upon an open field have no protection from erosion and exposure.

A 'polymer coating onto soils' would prevent erosion/runoff but not included.

Response: *The Site does not pose a significant risk to human health or the environment as described in DTSC's General Responses 3 and 4, so a remedial action including containment is not needed for the Site.*

Comment 15.101 - The approach of the PEA is to include a full Ecological Evaluation. This RPV report on immediately adjacent Preserves and Critical Habitat was not analyzed or investigated in Avocet Report. A copy of the Comprehensive Management and Monitoring Report 2013-2015 for The Rancho Palos Verdes, Conservation Plan and Habitat Conservation Plan is attached in this comment.

Response: *See DTSC's General Response 4 regarding the ecological screening evaluation performed for the Site.*

Comment 15.102 - I want to bring to your attention of the fact that the Avocet Report is based upon an 'understanding' and assumption that the PVPUSD gave permission for the AYSO to import 85 truckloads of soils on April 8 and 9th, 2015. That is simply untrue.

- On April 8 and 9, 2015, approximately 1,020 cubic yards of soil from grading operations at a residential property in Torrance (Section 3 2.3) were imported and end-dumped at the Site. Avocet understands that PV AYSO obtained PVPUSD's approval prior to importing the Torrance soil and that a PVPUSD representative inspected the soil beforehand. Moreover, PVPUSD used approximately ten truckloads of the same soil for its own purposes, albeit not in the vicinity of Ladera Linda Fields.

The PVPUSD denies that the District gave approval for importation of these soils. And in fact, the Superintendent claimed on July 13, 2016 public board meeting that he never was aware that the PVPUSD owned any soccer fields.

Since the Avocet Report report is based upon a false fact it needs to be accurate and corrected.

An 'understanding' is not the fact in this case. There are facts in this investigation and we look forward to the DTSC Criminal Investigation revealing the facts.

The PVPUSD each hired attorneys in late November 2015 due to the Alta Test Results and concerns of the test results.

The PVPUSD Board President sent this email below to the PVPUSD Superintendent at the time of the controversy due to concerns over the entire process or lack thereof.

Email PRA:
PAGE 147: "From: Larry Vandenbos <ovando9999@aol.com>
Sent: Tuesday, October 20, 2015 3:52 PM
To: Don Austin
Subject: Fwd: Dirt at Portuguese Bend Fields

I thought that we discussed this - apparently, before it happened?
I would like to find out the details at your convenience, this could turn into a cluster (**I remember your story about the first high school where you were a principal**).
This has the potential for a lot of grief with some board members."

The imported soils were not tested by any PVPUSD personnel; approved to the public's knowledge by any employee of the PVPUSD; not tested before import as required by the LAUSD; not tested before import per the DTSC Clean Fill Advisory; and the AYSO claims of soils allegedly coming from the Torrance remodel was the second story when at first AYSO claimed the soils were donated by the Trump property; and the DTSC, Alta and Avocet all claim that there were at least 2 sources of the soils origination.

It is the public' right to know the origination of the soils trucked onto public land and it is not irrelevant to this community as DTSC stated at the one and only public meeting.

I am requesting the exact origin of the soils dumped upon the fields from the DTSC investigation.

As with any investigation the public has rights because it is in the interest of the public.

Response: *This comment is not relevant to the purpose, contents and focus of the PEA. See DTSC's Response to Comment 15.20 regarding LAUSD's policy and DTSC's Advisory.*

Comment 15.103 - I want to include this as part of my comments for the Ladera Linda Investigation.

As a part of the PVPUSD's defense the district used an unlicensed person, Howard Spielman, who misrepresented himself to the PVPUSD stating that he was a P.E. when in fact that license had been canceled in 2006.

His work product with PVPUSD was in July 2016, 10 years after the license was cancelled.

To misrepresent oneself as an expert is unethical if not illegal by California Board of Professional Engineers.

That Board served Mr. Spielman with a violation in written letter in July 2016.

The non-expert opinion of Howard Spielman should be stricken from the record, and not allowed to be a part of any decision making or determination by the DTSC.

The video (attached) made by DTSC in July 2016 features Mr. Spielman making statements that have no merit and without any scientific evidence. These statements, tests, or documents presented by Mr. Spielman should be removed from the DTSC report.

Terry Tao, Atkinson, Andelson attorney created a contract/agreement with Howard Spielman that has not been made public.

I am requesting that document of employment between Terry Tao for the PVPUSD and Howard Spielman since this is now a public investigation

(A letter showing that Howard Spieldman uses the P.E. Title and REHS title in his signature for Terry Tao, Esq. that he does not have is attached in this comment.)

Response: *See DTSC's General response 5 regarding the sampling work performed by Mr. Spielman.*

COMMENT 16 – BJHILDE

Comment 16.1 - I attended your meeting wherein you made public your PEA report. That was less than 30 days ago, and the ONLY public meeting on the project occurred just 3 weeks ago.

Your comment period intersected two major holidays and their preparations, and preparations for the festivals of Christmas and Hanukah; Many people are taking vacation time now, and are unable to respond to your artificially induced time crunch.

DTSC FAILED to offer any reasonable extension of time for the community to issue comments, even though DTSC offered many extensions throughout the process to AYSO and PVPUSD

This is the first and ONLY time the public has ever been offered any opportunity to review to provide input, comments, or information on the project.

I asked 5 of my nearby neighbors, and none of us ever received the survey that DTSC supposedly mailed to the Ladera Linda community, or some of the other mailings shown on the website, calling into question the accuracy of your mailing.

Response: Please see DTSC's General Response 6 regarding the time extension for receiving comments. DTSC has conducted extensive public participation outreach given the fact that this is a no-further-action PEA. Please see DTSC's General Response 2 regarding all public participation conducted prior to this public notice.

Comment 16.2 - I contacted DTSC over a year ago regarding concerns and pertinent information regarding the project, and I was told I would be interviewed, but it never happened; instead, you interviewed AYSO, the PVPUSD and their cadre of attorneys. I must remind you that it was AYSO that started this enigma marathon...Do you really expect them to be objective while zeroing out the comments of the people who inhabit the area and have to live with 85 truckloads of questionable "stuff" in their midst. What about the loss in value of the real estate affected?

Response: DTSC did not interview only AYSO and PVPUSD as explained in DTSC's General response 2. With regards to the real estate value, this question is not within the project scope which is described in DTSC's General Response 1

Comment 16.3 - The public has been marginalized and discounted throughout the entire process. DTSC has shown prejudice against the community, and has not behaved in a manner that you would expect from a state agency that is supposed to be acting impartially to protect the health of the community.

DTSC FAILED to follow your own documented policy for community participation: "DTSC's experience has clearly shown that a well-planned public participation program, fully integrated into the overall technical program is a key factor in successful site remediation, corrective action, permitting and other DTSC activities where statute, regulation or policy

requires public outreach. Moreover, communities that are involved early and throughout the decision-making process may be more trustful and supportive of the process.”

It is unclear what DTSC will do with these comments, given your prior lack of interest in community concerns; you will likely just toss them. There is no trust that you will read them, or evaluate them, or attempt to integrate them.

Response: *DTSC has conducted extensive public participation outreach given the fact that this is a no-further-action PEA. DTSC’s public participation activities started in 2016 as described in DTSC’s General Response 2 and has considered and responded to all comments received for this project.*

Comment 16.4 - On the Envirostor website, this PEA report is referred to as the “Final” report. Please clarify. I did not think this was supposed to be “Final” until after all comments have been received and evaluated, and revisions made as necessary. If this is really “Final” then what is the purpose of the comment period at all? Is the comment period a hoax and pretense, or is this document not actually “Final” yet?

Response: *Please see Response to Comment 8.5 regarding the final PEA Report.*

Comment 16.5 - A general comment, I found the entire tone of this document to read like an apology for AYSO. That might be fitting since it was prepared by AVOCET for AYSO. But I was under the impression that DTSC would act as a neutral 3rd party to ensure an unbiased report and final recommendation, and that is absolutely not the case. This report contains extreme bias throughout. DTSC should ensure that the final product is neutral, reflects NO bias, and is strictly objective and scientifically sound. This document does not meet those minimum standards and further, leaves many questions unanswered.

Response: *The PEA Report presents objective and scientific data that indicates no asbestos fibers were detected in soil or air samples, and that no friable asbestos containing materials were encountered at the Site. See DTSC’s General Response 1 for the project scope.*

Comment 16.6 - On page ES-2 begin the fictional account of “1,020 cubic yard of soil imported ... from Sharynne Lane in Torrance, CA.” It has never been shown that the soil was imported from this site, and there is zero measure of how much soil was actually imported. This is a hotly debated issue, and it is more evidence of the extreme bias in this document, that this undocumented and unproved fictional history is provided here as undisputed fact. After reading outrageous half-truths like this, it is hard for a reader to have any faith that the rest of the document is going to provide any else but additional misinformation, fiction and lies.

Response: *Verifying the sources of the imported soil is not within the scope of the project which is described in DTSC's General Response 1 and Response to Comment 1.6.*

Comment 16.7 - At the one and only public meeting on the project, DTSC representatives stated that they did not want to get into the issue of the source of the imported soil; the source wasn't pertinent to this evaluation. And yet, you only refer to "Torrance soil" to distinguish it from the native soil. Then you need to replace all references to "Torrance soil" with "imported soil" to remove the inherent bias in this document and to preserve some element of neutrality in the final DTSC issued and blessed document. Otherwise DTSC is authorizing a biased fictional account of history. If this is not pertinent, then you should remove entirely any and all references to where to dirt came from. It would be most correct to simply state that 'AYSO imported 1020 cubic yards to the site/, period. If it doesn't matter where it came from for purposes of this PEA, then remove it. Or you can say that AYSO states that all the imported dirt came Sharynne Lane in Torrance, however that has not been proven or established as fact, and is contested.

Response: *Please see DTSC's General Response 1, Response to Comment 8.13 and Response to Comment 1.6 with regard to the imported soil.*

Comment 16.8 - It is inaccurate to state that the imported dirt "was spread out on top of" the quarry soil. I don't know if DTSC personnel reviewed the aerial photo history of the site. It's clear that in spring of 2015, 80-90 dump truck loads of dirt were dumped. You can clearly see the individual dump piles in the dated photos. Then that dirt was compressed into the current man-made berm that exists today.

More biased re-writing of history in the second paragraph of Site Background. Why does the report not reference Alta Environmental as performing the initial investigation and laboratory analysis? Is it because ALTA mentions some detection of Thallium? Why aren't the Alta test reports referenced or attached as part of this PEA? This paragraph tries to minimize the integrity of the initial findings. Those initial test reports belong with this document.

Response: *Aerial maps were reviewed and described in the PEA Report, Section 3.0. The Alta Environmental investigation was described in Section 4.1. of the PEA Report and posted in DTSC's EnviroStor for public information on November 18, 2016. Both aerial maps and Alta Environmental investigations were reviewed by DTSC for this PEA Investigation. See DTSC's General Response 1 for initial data submission.*

Comment 16.9 - 3rd paragraph of background again shows extreme prejudice in language stating that certain compounds were "negligible". This personal judgment should be replaced with scientific data. For example: 'concentrations for certain compounds were above laboratory reporting limits, but below the established threshold levels' is the kind of accurate, non biased scientific language that should be used.

Response: *Comment noted. See Response to Comment 8.11.*

Comment 16.10 - In the 3rd paragraph, references to tests site tests done using PLM should be deleted, or it needs to be noted, that those tests were conducted by non-licensed individuals. The person who conducted those tests for PVPUSD has since been issued a warning by the Board of Professional and Civil Engineers for misrepresenting his credentials and working without a current valid PE license. His was “Cancelled” in 2006.

Response: *See DTSC’s General Response 5.*

Comment 16.11. Replace all references to “Torrance Soil” with “imported soil” everywhere in the document.

Response: *See Response to Comment 8.13.*

Comment 16.12 - Quoting now from page 9 of this document, “there is nothing in the Site’s history to suggest it might have become contaminated by past land uses.” In contrast, the statement regarding the vinyl flooring found with asbestos is appropriate. It states that the vinyl flooring is inconsistent with the building material removed from the Torrance site, but does not make any unproven guesses about where it may have come from. If the concrete pipe is inconsistent with material removed from the purported Torrance source, say so, but don’t make other wild guesses about its origin.

Response: *See DTSC’s General Response 1 regarding sources of the imported soil. Also, please see Response to Comment 8.14.*

Comment 16.13 -. Pg. 1, 1.1, again the fictional unproved account of dirt all imported from a residence in Torrance. Delete this fictional account, since DTSC has stated that it is immaterial where the imported dirt came from.

Response: *See DTSC’s General Response 1 regarding sources of the imported soil and Response to Comment 8.13.*

Comment 16.14. Pg. 1, 1.1, “AYSO no longer intends to use the (imported) soil for field maintenance purposes.” This is a very odd statement to include in this document. I can attach other correspondence where they state that is the only purpose for the dirt. What then do they intend to do with it instead? This is only half of a statement, and begs the rest of the answer. This should be removed, or the statement should be completed as to what AYSO does now intend to do with the dirt.

Response: *Please see Response to Comment 8.17.*

Comment 16.15. Does DTSC certify that this dirt is SAFE for children to play on and in? Do you guarantee that children will not be exposed to increased risks for cancer or asbestos related lung diseases from playing on or in this dirt?

Response: See General Response to Comment 3.

Comment 16.16 - Pg. 1, 1.1, for accuracy and completeness Alta Environmental should be identified as the agency that conducted the initial investigation, and those test results should be an attachment.

Response: See Response to Comment 8.19.

Comment 16.17 - Pg. 2, why is the scope of the DTSC limited exclusively to asbestos?

Response: See DTSC's General Response 3.

Comment 16.18 - DTSC, AYSO, and the PVPUSD all FAILED to investigate warnings from Alta Environmental regarding "radiation" at the site.

Response: See Response to Comment 8.21.

Comment 16.19 - Pg. 12, Again more with the fictional biased account regarding the residence in Torrance purported to be the source of all the imported dirt. Did DTSC interview the Torrance city personnel in charge of building permits? If they did they would have found out that Torrance cannot verify that any of the dirt deposited at Ladera Linda originated from the purported site in Torrance. They also would tell you that no additional dirt was imported to that site to meet their fill requirements, all their fill needs were met by the soil on premises. So the net export of soil was approximately 300 cubic yards, max. Yes this is an approximation, but if it changed dramatically, as AYSO suggests 1050 cubic yard were exported instead of 300, that would have required a revision to the grading permit. The fact that AYSO simply accepts all this fiction without conducting a single independent check yet more evidence of how extremely biased, prejudiced and unreliable this entire report is.

Response: See DTSC's General Response 1 and Response to Comment 8.13. Also, please see Response to Comment 1.6 regarding the quantity of the imported soil.

Comment 16.20 - Pg. 14, Avocet refers to the truck receipts as "compelling", this is more evidence of bias and self-congratulatory behavior. If DTSC FAILED to perform any outside verification at all. The receipts appear to be manufactured after the fact. It is impossible to drive the route in the time marked on the receipts. Also the receipts indicate that only 6 or 7 trucks were involved in ferrying the dirt to the site, where several eyewitnesses recall seeing at least 20 trucks lined up along Forrestral Drive. There is an utter and complete lack of due diligence in any of this reporting.

Response: *DTSC has not received any evidence or supporting document to indicate the soil was imported from other sources. In addition, sources of the imported soil and trucks used for shipping are not within the project scope as described in DTSC's General Response 1.*

Comment 16.21 - Pg. 14, Avocet notes that fill imported from residential areas does not require approval from DTSC prior to transportation. However, Avocet and DTSC FAIL to note that the city of RPV DOES require permits to transport and import dirt into the city, and ASYO FAILED to obtain these legally required permits. Also the field is not an education site, and thus is subject to city jurisdiction. And AYSO FAILED to obtain the required Major Grading Permits. Also DTSC has developed rules for school owed properties, that state all dirt must be tested PRIOR to import. Again AYSO FAILED to follow the DTSC rule for testing dirt prior to importing it to a school owed site.

Response: *This comment is not relevant to the purpose, contents and focus of the PEA.*

Comment 16.22 - Pg. 18. In preparation for this document ONLY AYSO and PVPUSD personnel and their counsels were interviewed. No attempt was made to interview any of the residents. No attempt was made to interview anyone to check the story or source of the dirt. Even ALTA Environmental was not interviewed to gain a fuller understanding of the their original findings of the friable asbestos or their warnings regarding radiation at the site. Clearly DTSC and Avocet didn't want to know any of these things, they just wanted to print the story that AYSO told them.

Response: *Comment noted. DTSC has conducted extensive public participation outreach given the fact that this is a no-further-action PEA. See DTSC General Response 2 for public participation activities conducted for this project. See DTSC's General Response 3 regarding evaluating the Alta Environmental data. See Response to Comment 8.21 regarding radiation concern.*

Comment 16. 23 – Requesting an extension to comment period for Ladera Linda PEA

Response: *Please see DTSC's General Comment 6 regarding the public comment period extension.*

COMMENT 17 – Michele Beike

I am writing to demand that the 85 truckloads of construction debris that ruined our Ladera Linda fields be removed immediately.

We need to restore the Ladera Linda field to the pristine environment that existed and was enjoyed by community. Our kids deserve the best!

Response: *Please see DTSC's General Responses 3 and 4. Based on the results of the PEA, it is not necessary to remove the soil.*

COMMENT 18 - JOE ODENCRANTZ

Comment 18.1 - I would like to request at least a one week extension for comments on the Avocet Nov 3, 2017 report. There is no way that I can go through those 456 pages we just received in any detail by midnight tonight and then to put detailed comments to paper. I spoke to Mr. Tom Frazier of the AQMD earlier this day and he was unaware of the location of the July 12, 2016 Health Science Report (he is undoubtedly familiar with how to use Envirostor).

With respect to an extension, I respectfully request that we are granted at least a week and that you do what you can to get authority ASAP by COB. I'd be forced to submit an incomplete work product if I only have until midnight tonight

Response: see DTSC's General Response 6 with regards to the extension requests.

Comment 18.2 - It is my understanding that material from construction/demolition projects was dumped onto the Ladera Linda field on April 8 and 9, 2015 and the site is currently under Department of Toxic Substances Control (DTSC) oversight. Let me first start my summary of comments with the following passage from the October 2001 DTSC document entitled "Information Advisory Clean Imported Fill Material". Available at the link below.
(https://www.dtsc.ca.gov/Schools/upload/SMP_FS_Cleanfill-Schools.pdf).

On page 2, you will find the following passage on page 2:

Both natural and manmade fill materials are used for a variety of purposes. Fill material properties are commonly controlled to meet the necessary site specific engineering specifications. Because most sites requiring fill material are located in or near urban areas, the fill materials are often obtained from construction projects that generate an excess of soil, and from demolition debris (asphalt, broken concrete, etc.). However, materials from those types of sites may or may not be appropriate, depending on the proposed use of the fill, and the quality of the assessment and/or mitigation measures, if necessary. Therefore, unless material from construction projects can be demonstrated to be free of contamination and/or appropriate for the proposed use, the use of that material as fill should be avoided

The language clearly states, "material from construction projects can be demonstrated to be free of contamination". When there are children playing in soccer in a field, this would be especially true. The pathway of exposure could be inhalation (airborne contaminants) or ingestion (contaminants on soil or dust). What is appropriate for the proposed use? It is my understanding that there are many parents, whose children either live nearby or play soccer on the field, that are extremely concerned about the health risks of their children face by being exposed to "any" contamination from the non-native material dumped at the subject site, i.e. the Ladera Linda site. Avocet Environmental, Inc. (Avocet) goes to great lengths to suggest there are low risks from these non-native materials and does not address the levels of contamination documented in the subject report. In other words, there are multiple detections of

asbestos and volatile organic chemicals found in tested samples (not all collected samples were tested) that demonstrates the material dumped at the site was far from “free of contamination”.

The Los Angeles Unified School District (LAUSD), Facilities Services Division specifies the requirements for the sampling, testing, transportation and certification of imported fill materials or exported fill materials from school sites in the document entitled SECTION 01 4524, ENVIRONMENTAL IMPORT/EXPORT MATERIALS TESTING dated October 1, 2011.

(http://www.laschools.org/documents/file?file_id=219798234&show_all_versions_p=t).

The first listed objective (Section 1.02) is to “A. Ensure that fill materials imported to school sites are safe for students, staff and visitors.” A Soil Sampling Plan (SSP) must be prepared by a licensed environmental professional for review and concurrence by the LAUSD-Office of Environmental Health and Safety (OEHS) and submitted at least 72 hours before import sampling (See Section 1.04). There was no SSP prepared for the imported materials in this case and the materials were not tested before they were dumped on the field. Avocet did not address this requirement in the subject report. Section 2.01.A.1. states the following with regard to imported soils “Soils proposed for import shall be tested pursuant to the requirements of this Section (01 4524), unless a variance has been requested by CONTRACTOR and approved by LAUSD-OEHS prior to the import of the subject materials.”. It is my understanding that no variance of any kind was granted for the imported materials. Further, Section 2.01.A.3. states the following with respect to miscellaneous materials “No miscellaneous material containing crushed concrete, asphalt, construction debris, or other potential deleterious materials may be utilized or imported to a LAUSD project site for use as fill or grading material.” Once an SSP is approved, a draft Soil Certification/Sample Data Report is prepared by the licensed environmental professional to be reviewed by LACSD-OEHS. The SSP Contractor must have the appropriate license, and demonstrated experience in soil sampling and waste classification set forth in a qualifications statement. There are strict requirements which are part of the SSP process that preparation of a soil certification/sample data report which includes waste classification determination and indication of DTSC/agency regulatory status, i.e. issuance of a No Further Action-NFA determination before the material is considered for import. If requirements for import are satisfied, a professional geologist or a professional civil engineer must sign and stamp the final report. Avocet did not address this requirement in the subject report and neglected to mention the necessity of these requirements prior to importing material onto a LAUSD site.

Avocet reported “All seven of the soil matrix samples contained detectable concentrations of five or more of seven OCPs” [Note: OCPs are Organochlorine pesticides] on page 21 of the subject report. LAUSD-OEHS may deem imported fill defective if “OCPs are present at concentrations exceeding the laboratory reporting limit.”. Instead of addressing the LAUSD-OEHS requirement of no OCPs present over the laboratory reporting limit, Avocet states “As indicated above, all of the reported OCP concentrations were orders of magnitude lower than potentially applicable screening levels.” Avocet reports forty-five detections of OCPs and completely left out the LAUSD-

OEHS states that any OCPs present over the laboratory reporting limit may deem imported fill defective. Because the fill was not tested prior to import, one cannot determine where the OCPs originated from. Avocet also reports on page 22 of their report that “Sample SS-2 contained 5.6 µg/kg of benzene” in December 2015 in the soil stockpile area. Once again, Avocet left out the LAUSD-OEHS states that “Solvents and other VOCs are present at concentrations exceeding the laboratory reporting limit.” may deem imported fill defective for import at a school site. Rules were broken and individuals and/or companies should be held accountable for their actions. Avocet is shifting attention to the post facto site characterization data and ignores the DTSC and LACSD-OEHS requirements for importing materials. No material was tested or cleared before being dumped onto the Ladera Linda site.

Response: *DTSC does not follow internal LAUSD policies. See Response to Comments 8.22 regarding the LAUSD’s policy and DTSC’s Advisory. See DTSC General Response 3 and Response to Comment 8.36 regarding human health screening evaluation and exposure pathways. Also, portions of this comment are not relevant to the purpose, contents and focus of the PEA.*

Comment 18.3 – PEA Report, ES-3. The conclusion that the ‘non-friable’ debris is not friable is based upon the assumption that the soils with any debris remain intact. The fact that the DTSC intends to uncap the 24,000 cu. ft. of soils may lead to erosion of the soils and thus the debris may ultimately become friable. Not all the soils in the entire berm were trenched, thus the DTSC cannot determine the real quantity of the asbestos laden debris.

Response: *See Response to Comment 8.34.*

Comment 18.4 - PEA Report, ES-4. This confirms the Alta Report that cites at least two sources of the soils dumped upon the school field. As a school property, the DTSC needs to confirm the origin of the soils per the contract of the AYSO and PVPUSD and the continued safety of the children. In the future, any person may claim a source of soil but in fact the origin is not an accepted by the DTSC Advisory for Clean Fill source.

Response: *See DTSC’s General Response 3 and 4. This comment is not relevant to the purpose, contents and focus of the PEA.*

Comment 18.5 - PEA Report, ES-4. “None of the Perimeter Air Sampling equipment were placed at children’s height level.”

90% of the field time is used by children. Until such time that air samples are placed at the breathing height of children, this is not conclusive evidence of Asbestos free PEA field work detection. Children’s height is lower in stature and AYSO youth soccer is the majority user of these fields. Children play on this field 7 days a week.

No tests were conducted to anyone’s knowledge to duplicate the impact to air quality for the two days of 85 truckloads dumped upon the field through laboratory testing. To

understand the human health impacts of those two days and possible Asbestos exposure these tests should be conducted. No air quality tests were conducted in the homes tract to compare to the air quality at the field level. Assumptions that the air quality meets any standard based upon Los Angeles City air quality levels is not acceptable.

Air sampling should be repeated and with multiple qualified contractors and with an agreed upon protocol that includes agreement on the sampling event timing, i.e. during a minimum sustained wind event (direction and magnitude) and after a certain number of days without rain. Spilt samples and sampling equipment should be used to verify the data sets and at least ten sampling events should be conducted to verify a variety of conditions and to satisfy the parents who are concerned about their children or grand children's health.

Response: See Response to Comment 8.36 for air monitoring.

Comment 18.6 - PEA Report, ES-4. "Based on the absence of friable ACM at the Site, there are no complete exposure pathways via which human or ecological receptors could be exposed. As such, risk cannot be quantified but is considered negligible."

If the investigation results cannot be quantified as explained in Page ES-4 then the conclusion cannot be made that no risk is present.

Response: Please see DTSC's General Response 3 with regard to the screening levels for asbestos. A risk quantification or site remediation is not warranted if no friable asbestos is encountered at the Site.

Comment 18.7 – PEA Report, Page 19. "Nine additional small pieces of C&D debris were removed from the surface of the Torrance soil in July 2016."

These nine pieces taken from the Ladera Linda field was under the contract with Howard Spielman hired by Atkinson, Andelson attorney for the PVPUSD. It is confirmed that Howard Spielman's P.E. license was cancelled in 2006. His REHS was cancelled in 2011.

Under CA Board of Professional Engineer's law a person must be currently licensed to sample and report and sign for sampling. The Spielman Health Associates Report should disqualify any testing and conclusions. Howard Spielman misrepresented his qualification to the PVPUSD and in turn a Violation by the Board was issued against Spielman. And in fact, in violation of the AQMD order to cover the berm at all times, the PVPUSD, Spielman, and Atkinson, Andelson Spielman and PVPUSD uncovered the berm to make a video of their charade.

Response: Please see DTSC's General Response 5.

Comment 18.8 – PEA Report, Page 21. “All seven of the soil matrix samples contained detectable concentrations of five or more of seven OCPs, as follows:” through “As indicated above, all of the reported OCP concentrations were orders of magnitude lower than potentially applicable screening levels.”

Alta Environmental sent correspondence to PVPUSD warned that LAUSD would not accept “this soil for import due to the presence of any detectable concentrations of organochlorine pesticides.” PVPUSD should not have accepted this soil and the soil should have been tested before import as not only stated in the LAUSD Policy but the DTSC Clean Imported Fill Material Advisory. Avocet has found deleterious debris embedded throughout the imported field soils as well. This is not acceptable to LAUSD policy and PVPUSD inaccurately stated that their district met the LAUSD Criteria in January 2016 on the district website (Source: Personal Communication with Ms. Joan Davidson).

***Response:** See Response to Comment 18.2. Also, this comment is not relevant to the purpose, contents and focus of the PEA.*

Comments 18.9 - PEA Report, Page 23. “All five of the soil matrix samples contained detectable concentrations of five or more of seven OCPs, as follows:” through “As indicated above, all of the reported OCP concentrations were orders of magnitude lower than potentially applicable screening levels.”

Avocet report fails to state that LAUSD would not accept soils exceeding lab limits or that have any concentrations of Organochlorine Pesticides. This does not meet the DTSC Clean Fill Material Advisory.

***Response:** This comment is not relevant to the contents of the PEA. See Response to Comments 18.2 and 8.22 regarding the DTSC’s Advisory.*

Comment 18.10 – PEA Report, Page 23, Section 4.1.4 Health Sciences Investigation, July 2016.

Health Science ‘expert’ Howard Spielman hired by PVPUSD via Atkinson, Andelson Attorney Terry Tao does not have a current CA P.E. license. Cancelled in 2006. Spielman does not have an REHS license, cancelled in 2011. His sampling and signature on any CA sampling or test results is not valid. It requires a licensed environmental professional (licensed State of California Professional Engineer [PE Civil], Professional Geologist. It should be noted that the Health Science Report was never made public to any community members. I wrote the attached email this afternoon in a last-ditch effort to obtain the report and received an email from Ms. Chia Rin Yen of the DTSC today at 3:46PM directing me to the whereabouts of the report. (attached hereto). I have not had sufficient time to review and examine the 456 pages of information that I received late in the day this day. These comments are subject to change and addition in the future as a result.

Response: Please see DTSC's General Response 5.

Comment 18.11 – PEA Report, Page 24, Section 4.1.5. “To further evaluate the possible presence of asbestos on the Upper Ladera Field, Avocet collected nine confirmation soil samples, five from the “border area” between the fields and the stockpile area and four from the actual playing surfaces (Figure 3). All nine surficial soil samples were submitted to the Eurofins Calscience, Inc. (Eurofins) laboratory in Garden Grove, California for analysis for:

- Title 22 metals using EPA Method 6010B/7471A
- OCPs using EPA Method 8081A
- Asbestos using PLM”

The surface samples are not sufficient evidence of non-contamination. Nine total samples are not sufficient evidence of non-contamination. Polarized Light Microscopy (PLM) is not sufficient lab results to ensure that Asbestos is not present. A complete subsurface investigation should be performed and all soil/debris that contains any contamination not allowed by the LAUSD-OEHS import standards references earlier in this letter (SECTION 01 4524, ENVIRONMENTAL IMPORT/EXPORT MATERIALS TESTING dated October 1, 2011) should be removed/properly disposed of (Import fill material that would have been deemed defective for use by LAUSD-OEHS originally if done in accordance with their guidance). Further and in accordance to the DTSC Information Advisory Clean Imported Fill Material Guide “material from construction projects can be demonstrated to be free of contamination” should not have been dumped at the site in the first place. If a proper standard of care were used to begin with, the current problematic situation would not have arisen.

Response: Please note that DTSC has evaluated all past investigation results conducted prior to the PEA investigation, including the Avocet Investigation described in Section 4.1.5 of the PEA Report. DTSC did not make the decision based on only nine samples collected by Avocet in 2016. After evaluating the past investigation data, DTSC determined that further asbestos investigation was needed for the Site. The further investigation was addressed in the PEA which required asbestos be analyzed by both polarized light microscopy (PLM) and transmission electron microscopy (TEM). Therefore, PLM was not the only method used to detect the presence of asbestos.

See Response to Comment 8.22 regarding the DTSC's Advisory.

Comment 18.12 – PEA Report, Page 29. “The CSM for the subject Site is presented in Table 4, but in simple terms, the Site may pose a risk to human receptors via exposure to friable ACM embedded in the Torrance soil and/or to asbestos fibers in the Torrance soil matrix or on the ground surface in topographically downgradient areas due to stormwater runoff. Based on the available information, it is by no means clear that the asbestos-containing C&D debris (friable or otherwise) was present in the soil imported from Torrance. Regardless of its origin, and as indicated in the conceptual receptor network shown in Table 4, the risk to human receptors is due to inhaling asbestos fibers

from additional friable ACMs, if present, at the Site. Asbestos is generally not considered harmful via ingestion or direct contact, although the proximity required for ingestion or direct contact would increase the risk of exposure via inhalation. As shown in Table 4, asbestos is not soluble and generally does not migrate through soil and so cannot infiltrate the subsurface and reach groundwater. As discussed in Section 4.1, samples of the imported Torrance soil have been analyzed for a comprehensive range of common industrial contaminants. The samples contain naturally occurring metals and trace concentrations of TPH and certain OCPs; however, none of the reported concentrations exceed residential screening levels or, for arsenic, background levels.”

The statement : “Asbestos is generally not considered harmful via ingestion or direct contact, although the proximity required for ingestion or direct contact would increase the risk of exposure via inhalation.” does not consider the use of the field or the age of the children using the field or conditions in winter of the field.

Young children ages 4 –11 use the field. In winter the rains flood the field. The children who play soccer on the field will pick up the wet soccer ball or come in contact with contaminated soils whether Asbestos related or Organochlorine Pesticides leached into the flooded fields. Alta and Leymaster identified Organochlorine Pesticides that can leach out onto the flooded field. This is potentially very harmful to young children and thus not considered in this conclusion. Avocet also fails to include, once again, that LAUSD would never have accepted this soil/debris/etc. Avocet does not consider the winter rains and the flooded field that will impact the adverse effects on the children who use the field.

Response: *The organochlorine pesticides were detected below screening levels and asbestos fibers were not detected in soil and the site does not pose a significant risk to human receptors, including children as explained in DTSC’s General Response 3. Therefore, chemicals leaching to surface water is not of concern as explained in Response to Comments 8.36 and 15.47.*

Comment 18.13 – PEA Report, Page 29. “Given the low mobility of friable ACMs in soil and the absence of adverse health effects via water pathways, no potential receptors were identified under the CSM.”

Once again, Avocet does not consider the winter rains and the flooded field that will impact the adverse effects on the children who use the field.

Response: *Please note that potential receptors were discussed in the PEA Report, Section 5.0 and DTSC’s General Comment 3.*

Please see Responses to Comment 8.36 and 15.47 regarding the winter rains and flood.

Comment 18.14. – PEA Report, Page 30. “Per the DTSC guidance manual, evaluation of the factors related to air pathways should only be included if “sampling data exist to

document a release of a hazardous substance/material to the atmosphere or if the threat of a release exists.” As noted previously, exposure via inhalation and the air pathway was potentially complete based on the presence of a single piece of potentially friable ACM debris; however, that potential exposure pathway was eliminated by fencing the Site and covering the levelled imported soil stockpile.”

DTSC/Avocet does not consider that Air Sampling test results do show fibers at low levels and there was Asbestos found in laboratory analysis from many samples. Some of these tests were taken two and a half years after the dumping took place. The friable Asbestos fibers that resulted from having dumped 85 truckloads onto the field the damage has already occurred to the human health of the residents and children.

Response: Please note that there were no asbestos fibers detected in any air samples as described in Appendix G of the PEA Report. Appendix G indicates that fibers were detected in air samples by phase contrast microscopy in accordance with the National Institute for Occupational Safety and Health (NIOSH) 7400 Method. The air samples were additionally analyzed for asbestos structures/fibers by Transmission Electron Microscopy (TEM) in accordance with NIOSH 7402 Method and no asbestos fibers were detected in any of air samples.

Comment 18.15 - PEA Report, Page 31. “Based on the preliminary investigations, there was no indication that the imported Torrance soil contained organic contaminants, including OCPs, at other than negligible concentrations, and metals concentrations were consistently within accepted background ranges. Three pieces of asbestos-containing C&D debris, only one of which was considered potentially friable, had been removed from the surface of the leveled Torrance soil, but their origin is unclear and none of the samples of the Torrance soil itself contained asbestos. Moreover, there was no evidence to suggest that C&D debris, asbestos-containing or otherwise, from or related to the imported soil, including the Torrance soil, had migrated or been deposited outside of the fenced Site boundary. Thus, the sampling strategy described below was to determine whether the imported Torrance soil contained friable ACM and whether any such friable ACM may have impacted the soil itself.”

It is unclear what the statement ‘their origin is unclear’ means. The field did not contain the debris noted in the reports such as broken lumber, electric conduit, vinyl tiles, roofing materials, mastic, etc. The OCP’s found by both Alta and Leymaster reports confirm the presence of Organochlorine Pesticides that are known to be Carcinogenic.

Response: The origin of the asbestos containing construction and demolition debris is not the focus of the investigation. Please see DTSC’s General Response 1 for the project scope. The organochlorine pesticides at the Site were detected below screening levels and the Site does not pose a significant risk to human health as explained in DTSC’s General Response 3.

Comment 18.16 – PEA Report, Page 32. “More specifically, air samples were collected in the breathing zone height range at three representative upwind locations and four representative downwind locations.”

No breathing zone tests were taken at the height of a child that uses the field.

The ‘breathing zones’ were taken at adult height as shown in the report at the height at or above the fence lines.

Response: See DTSC Response to Comment 8.36 for air monitoring.

Comment 18.17 – PEA Report, Page 34. “As the test trenches were excavated, the CAC/CSST and at least one civil engineer inspected the floor and sidewalls of the trench and the spoils deposited in the windrows for the presence of C&D debris. Debris was routinely encountered as the trenches were excavated, but most of it was not C&D debris and very few pieces were considered potential ACM. Examples of non-C&D debris included crushed aluminum beverage cans, bottle caps, broken glass, and children’s plastic toys. Examples of C&D debris included wire, rope, pieces of broken lumber, pieces of steel pipe, and electrical conduit. Significantly, no debris, C&D or otherwise, was observed to be embedded in the Torrance soil except in those areas where the Torrance soil had been mixed with other soil types. In total, six pieces of C&D debris were identified by the CAC/CSST as potentially ACM and were submitted for asbestos testing by PLM. Avocet notes that DTSC’s onsite geologist was actively involved in the discussions about which of the C&D debris samples should be submitted for analysis.”

Debris was routinely encountered. The imported soil is not appropriate in or near a school field.

Response: The Site does not pose a significant risk to human health as explained in DTSC’s General Response 3.

Comment 18.18 – PEA Report, Page 35. “The other C&D debris samples submitted for analysis were a piece of brown fiberboard, a piece of white ceramic tile, a piece of 4-inch-diameter suspected asbestos-concrete pipe (ACP), and the piece of white, patterned vinyl floor covering discussed in Section 6.1.6.1. The suspected ACP encountered in Trench 4 was in the excavator bucket and was not observed until the operator deposited the spoil on the ground surface. As such, Avocet was not able to document exactly what depth and in which type of soil the pipe was encountered.”

Only certain pieces of debris were chosen for testing. It is not conclusive if the asbestos concrete pipe will become friable over time due to erosion or winter weather. This could become a danger to human health.

Response: *The decision whether a C&D debris should be analyzed was decided by a Certified Asbestos Consultant. See Response to Comment 8.34 regarding the erosion by environmental conditions.*

Comment 18.19 - PEA Report, Page 35. "In accordance with the DTSC-approved PEA work plan, "biased" soil matrix samples were collected in conjunction with most of the potential ACM C&D debris. In some instances, however, the potential ACM C&D debris was not observed until the backhoe bucket had been emptied, thus the precise origin was not clear and no biased soil matrix samples were collected. That said, a total of eight biased soil matrix samples (seven of Torrance soil and one of Ocean Field soil) were collected on the basis of their proximity to potential ACM C&D debris."

All debris should be tested and questionable why ACM C+D debris was not observed until the backhoe bucket had been emptied. That said?

Response: *The decision whether a C&D debris should be analyzed was decided by a Certified Asbestos Consultant.*

Comment 18.20. PEA Report, Page 36. "The sampling locations were selected based on visual observations of surface water runoff patterns. The downslope soil samples were collected from the ground surface to a depth on the order of 2 or 3 inches."

It is questionable to test definitively without knowledge of the exact surface water runoff patterns. The patterns should have been determined prior to the investigation. And a depth of 2-3 inches is not conclusive.

Response: *The PEA Report, Section 6.1.6.4, clearly establishes surficial soil topographically downslope of the stockpile area as potential storm water run-off pattern before the sampling.*

Comment 18.21 -PEA Report, Page 36. "In accordance with the DTSC-approved PEA work plan, the analytical program was sequential, with the potential ACM C&D samples analyzed first, followed by PLM testing of the biased and unbiased soil matrix samples, followed by confirmatory TEM analysis of selected biased and unbiased soil matrix samples. The results of the analytical program are discussed in Section 6.2.

Following is a summary of the analytical testing performed:

- Six pieces of C&D debris were analyzed for asbestos using PLM in accordance with EPA Method 600/R-93/116 with a detection limit of 1 percent.
- All 44 of the unbiased Torrance soil samples were tested (screened) for asbestos using PLM in accordance with CARB Method 435 with a detection limit of 0.25 percent.
- Two of the biased Torrance soil samples (T4-36-06 and T5-21-01) and one biased Ocean Field soil sample (T4-36-15) were analyzed for asbestos using TEM (CARB Method 435 Level C) with a detection limit of 0.01 percent.

- Fifty percent of the unbiased Torrance soil samples (22 of the 44 samples analyzed by PLM) were also analyzed for asbestos using TEM, in accordance with CARB Method 435 Level C, with a detection limit of 0.01 percent.”

It is inconclusive to state there is no human health risks for Avocet only tested only 50% or 22 of 44 samples taken for TEM. The PLM methodology testing is not as accurate as TEM. Why did the DTSC choose to only test half the samples?

Response: *The asbestos testing was discussed in the PEA Workplan, dated March 10, 2017 and approved by DTSC on March 29, 2017. Based on the PEA Workplan, DTSC requested the soil samples to be analyzed by TEM because of lower detection limits. However, the cost of TEM is more than ten times the cost of the PLM analysis. Moreover, and more importantly, the mass of sample used in TEM analyses is approximately six orders of magnitude smaller than the sample mass used for PLM analyses. Thus, the sample mass used for PLM analysis is more representative of the actual soil matrix than the sample mass used for TEM analysis. To strike a balance between cost, the representativeness of the sample, and lower detection limits, the workplan proposed analyses of 50% of the total samples be analyzed by TEM if no asbestos is detected using PLM.*

Comment 18.22. – PEA Report, Page 37. “The 29 unbiased Ocean Field soil samples, 7 indeterminate soil samples, and the 4 downslope samples were held at EMSL’s San Leandro laboratory for possible future analysis.”

Why did DTSC/Avocet choose to hold back 29 unbiased samples and 4 downslope samples for future analysis? This is not a conclusive report.

Response: *These samples were not analyzed as proposed in the March 10, 2017 PEA Workplan because no asbestos was detected in the imported soil.*

Comment 18.23 – PEA Report, Page 39. “While the concrete pipe and the vinyl floor covering samples contained more than 1 percent asbestos, the Pacific EH&S CAC determined that these materials were nonfriable ACM and had not resulted in an asbestos release into the soil. The CAC further concluded that the identified ACM would not become friable in the future unless mechanically disturbed by, for example, saw-cutting or grinding. As such, the identified ACM C&D debris sitting undisturbed in/on the soil would not pose a future asbestos release.”

Questionable conclusion and non-friable has been known to be friable under erosion. It is mostly possible that the soils will be disturbed and will become friable.

Response: *See Response to Comment 8.34.*

Comment 18.24 – PEA Report, Pages 39-40. “In accordance with the DTSC-approved PEA work plan, the analytical program for soil matrix samples was sequential, with

unbiased samples of Torrance soil being first analyzed or screened using PLM before selected Torrance soil samples were subject to confirmatory analyses using TEM. In addition, biased samples of Torrance and Ocean Field soil were analyzed directly for asbestos using TEM. The results of the analytical program are summarized in Table 5 and were as follows:

- All 44 of the unbiased Torrance soil samples were tested (screened) for asbestos using PLM in accordance with CARB Method 435, with a detection limit of 0.25 percent. No asbestos was reported.
- Fifty percent of the unbiased Torrance soil samples (22 of the 44 samples analyzed using PLM) were analyzed for asbestos using TEM, in accordance with CARB Method 435 Level C, with a detection limit of 0.01 percent. No asbestos was reported.
- Two biased soil samples collocated (approximately) with the piece of 4-inch-diameter ACP encountered in Trench T4 were analyzed for asbestos using TEM in accordance with CARB Method 435 Level C. Sample T4-36-06 was of Torrance soil and Sample T4-36-15 was of the underlying Ocean Field soil. Although the ACP contained 25 percent chrysotile asbestos and 8 percent crocidolite asbestos, the CAC determined it was nonfriable and no asbestos was reported in either of the co-located soil samples with a detection limit of 0.01 percent.
- A biased Torrance soil sample (Sample T5-21-01), collocated with the white vinyl floor covering exposed after the stockpile cover was removed for Trench T5, was analyzed for asbestos using TEM in accordance with CARB Method 435 Level C. Although the white vinyl floor covering contained 10 percent chrysotile asbestos, the CAC determined it was nonfriable and no asbestos was reported in the collocated Torrance soil sample with a detection limit of 0.01 percent.”

Report is not conclusive by sampling only 22 of the 44 samples. 50% are not sampled or tested using TEM. Earlier in the Report, Avocet states this was a cost consideration. That is not acceptable.

CAC reported that the 25% chrysotile asbestos was not friable. This is not based upon conditions at this site.

Another collocated white vinyl floor covering and contained 10% asbestos and again determined as nonfriable that is questionable. Only assured method of Asbestos laboratory detection was denied.

Response: *Testing using TEM was not denied. Please see Response to Comment 18.21.*

Comment 18.25 – PEA Report, Page 41. “Based on the results of the preliminary investigations and the PEA sampling and analysis program, the only hazardous substance of potential concern at the Site is asbestos potentially present in ACM C&D debris or in soil and that potentially could become airborne. As previously noted, DTSC classifies ACM as hazardous waste if it is both friable and contains 1 percent or more asbestos. However, DTSC considers nonfriable asbestos-containing waste

nonhazardous regardless of its asbestos content. Including the two pieces identified in the course of the subject PEA, a total of five pieces of C&D debris collected at the Site have been confirmed as ACM, although it is by no means clear that any of the five pieces are related to the imported Torrance soil. Moreover, none of the five pieces of ACM C&D debris were determined to be friable.

The CSM described in Section 5.1 and presented graphically in Table 4 indicates that adverse health effects related to asbestos are limited to exposure via inhalation. Thus, any potentially complete exposure pathway must include airborne asbestos particulates or fibers. Based on the results of the subject PEA and the investigations that preceded it, no friable ACM debris has been confirmed at the Site and only one piece of potentially friable ACM debris has been identified. Moreover, none of the soil matrix samples analyzed has contained detectable concentrations of asbestos; including the 25 soil matrix samples analyzed using TEM with a detection limit of 0.01 percent. Based on the absence of friable ACM debris and the absence of asbestos fibers in the imported soil matrix, there is no complete exposure pathway via inhalation, whether “direct” or related to asbestos fibers transported away from the imported soil stockpile by wind or surface water runoff.”

Although the CAC made determinations in the Field upon which piece of found asbestos debris was friable or non-friable this is a questionable decision. The fact that Asbestos debris was found to be in the soils dumped onto the Ladera Linda field is most alarming. This pristine field did not have Asbestos or construction debris until April 8 and 9, 2015 when 85 truckloads arrived without permission and permits.

Avocet has created a convenient determination that the debris is not friable but indeed may be so.

No construction debris of this nature should be on this school field used by young children.

As stated in the LAUSD Import Policy and Criteria no deleterious materials may be utilized or imported to a LAUSD project site for use as fill or grading. And a licensed P.E. or Geologist must sign and approve such import.

This soil must be removed.

Avocet is assuming that the only pathway is inhalation but in this case of a flooded winter field and young children it is simply not the only pathway.

It is a contradiction for Avocet and the DTSC to conclude that there is no Human Health Risk when in fact the DTSC has no guidance document to support this conclusion nor the does the EPA have RSL's to support Avocet's statement.

Response: *The determination made by CAC is not questionable because the CAC is the trained professional certified for performing such tasks.*

Please see Response to Comment 7.3 with regards to the compliance with LAUSD's policy.

See Response to Comment 8.34 regarding the weather conditions and DTSC's General Response 3 regarding human health screening evaluation.

See Response to Comment 15.47 regarding the surface water exposure due to flood.

Based on the results of the prior investigations and the PEA, DTSC does not believe that the soil must be removed from the site since it poses no significant health risk.

Comment 18.26 - PEA Report, Page 41. "EPA has not published RSLs for asbestos, friable or otherwise, and DTSC's Human and Ecological Risk Office does not provide guidance on risk assessment for asbestos. Cal-OSHA has published an 8-hour TWA PEL for asbestos of 0.1 f/cc and a 30-minute excursion limit for asbestos of 1.0 f/cc. Regardless of these screening criteria, however, a quantitative HHSE is not possible as no friable asbestos has been confirmed and, thus, there are no complete exposure pathways."

The fact that the EPA has no RSL'S for Asbestos, and the DTSC has no Guidance for Asbestos then Risk Assessment it is impossible to quantify for the Human Health Risk Assumptions in this Report.

Young children are extremely vulnerable and Avocet and DTSC has not made the determinations that the children are safe on this field.

Response: *Asbestos fibers were not detected in soil or air samples. Please see additional information in DTSC's General Response 3.*

Comment 18.27 – PEA Report, Page 41. "EPA has not published RSLs for asbestos, friable or otherwise, and DTSC's Human and Ecological Risk Office does not provide guidance on risk assessment for asbestos. Cal-OSHA has published an 8-hour TWA PEL for asbestos of 0.1 f/cc and a 30-minute excursion limit for asbestos of 1.0 f/cc. Regardless of these screening criteria, however, a quantitative HHSE is not possible as no friable asbestos has been confirmed and, thus, there are no complete exposure pathways."

It is unclear what governmental Human Health Risk Assessment screening levels Avocet and DTSC used to make conclusive assertions on the human health risks to children or residents when in fact there are no EPA RSL's or DTSC Guidance on this Asbestos exposure. Avocet's conclusion is not based upon substantial evidence or governmental scientific guidance and is therefore not quantitative evidence.

If it is not possible to make quantitative Human Health Screening Evaluation (HHSE) statements then this Avocet report is without merit.

To dismiss the lack of screening criteria by DTSC and EPA and then draw conclusions about Human Health Risks by Avocet should not be admissible.

Response: *The information provided in the PEA Report, Section 7.2 Page 41, is adequate. DTSC did not use a screening level for asbestos since there were no detected asbestos fibers in the soil samples. Please see DTSC's General Response 3 with regards to the screening criteria for other detected chemicals. See Response to Comment 15.2 regarding the asbestos testing.*

Comment 18.28. PEA Report, Page 47. "Based on the absence of friable ACM at the Site, there are no complete exposure pathways via which human or ecological receptors could be exposed. As such, risk cannot be quantified but is considered negligible."

Avocet has reported finding many ACM items of Construction and Demolition debris. Any EPA RSL's or any DTSC guidance on risk assessments does not support Avocet's conclusion that the risk is negligible.

In fact, the previous Alta Environmental Report concluded that the Asbestos was indeed a concern and found many pieces with Friable Asbestos. Alta required the field to have restricted access.

The DTSC issued a Fence and Post Order on August 1, 2016 based upon evidence.

Response: *DTSC agrees that asbestos was a contaminant of concern as recommended in the Alta Environmental Report. As a result, DTSC issued a Fence and Post Order in 2016 and entered into a consent agreement to further investigate the Site under a PEA as explained in DTSC's General Response 1. The PEA required further investigation at the Site to determine whether the friable asbestos containing materials may be distributed throughout the imported soil and whether asbestos fibers from asbestos containing materials may be present in the imported soil. The PEA investigation did not encounter any friable asbestos containing materials and asbestos fibers in the soil. Based on the PEA investigation, the site does not pose a significant risk to human health and no friable asbestos containing materials and asbestos fibers were encountered or detected at the Site.*

Comment 18.29 - Avocet reported on page 22 of the subject report "Sample SS-2 contained 5.6 µg/kg of benzene" in December 2015 in the soil stockpile area. As a result, Avocet should have endeavored to find the source of benzene and determined the vapor phase concentration of benzene as well as other VOCs in the soil gas of all the dumped dirt/materials by conducting a detailed soil vapor investigation. DTSC's Preliminary Endangerment Assessment Guidance Manual dated October 2015 states "2.4.2.2 SOIL VAPOR SAMPLING DTSC has determined that, at sites where

volatile organic compounds (VOCs) are suspected, soil vapor (or soil gas) sampling is the method of choice for evaluating inhalation exposure. Both soil vapor and soil matrix sampling are usually necessary for indicating the presence and general extent of VOC soil contamination, and the potential for groundwater contamination. See the most recent version of Cal/EPA's Active Soil Gas Investigation Advisory16 for collection of soil gas and Guidance for the Evaluation and Mitigation of Subsurface Vapor Intrusion to Indoor Air17 for soil gas sampling directly under building foundations.” (Source: https://www.dtsc.ca.gov/PublicationsForms/upload/PEA_Guidance_Manual.pdf). Avocet has not conducted a comprehensive vapor survey to determine the hot spots and lateral extent of VOCs in the dumped soils.

Avocet must certainly be aware of the problems associated with discrete/bulk soil sampling as summarized by the USEPA “There is a potential for significant losses of VOCs by volatilization, degradation, or a combination of the two when collecting bulk soil samples in the field, during storage prior to analysis, and during subsampling and sample preparation in the laboratory. Studies evaluating soil sampling and analysis protocols have shown that VOC concentrations can be biased low by a factor between 10 and 1,000 when methods to minimize VOC losses are not employed.” Source: Challenges in Bulk Soil Sampling and Analysis for Vapor Intrusion Screening of Soil, EPA /600/R-14/277, October 2015, <https://clu-in.org/download/issues/vi/VI-engineering-issue-600R14277.pdf> . Avocet has focused on the lack of detections of VOCs from the discrete/bulk sample results and must surely be aware of the lower detection limits of VOCs in soil vapor/gas. Avocet needs to comply with all the elements of DTSC’s Guidance on PEAs for soil vapor sampling and human health screening risk/hazard evaluation. As such, Avocet should be required to performed an extensive vapor/soil gas for entire extent of the dumped soils, etc. and, as such, their published PEA on November 3, 2017 is fundamentally flawed/indefensible.

Response: *The PEA Guidance Manual recommends soil vapor sampling for defining the sources of releases and extent of the volatile organic compounds (VOCs). Based on the Site history, the Site is unlikely to have been contaminated by historical land uses.*

With regards to the human health screening criteria, see DTSC’s General Response 3.

Comment 19 – Laura Channell

Comment 19.1 - Other than \$ cost, why were only 50% (just 22/44) of the samples taken tested using TEM the only way to truly identify asbestos fibers?

Response: *See Response to Comment 18.21.*

Comment 19.2 - Was not the PEA or preliminary endangerment assessment, required to complete an adequate and full Ecological Evaluation.

Yet, protection of the U.S. Fish and Wildlife Critical Habitat was not even identified, mentioned or mapped on lands sited with the RPV borders! Why not?

Please tell me how does the soil dumped at Ladera Linda compare to the natural soils found there prior to this questionable dumping?

Response: *The investigation of natural soils is not within the project scope described in DTSC's General Response 1.*

With regards to the ecological evaluation, please see DTSC's General Response 4.

Comment 19.3 - Both PVPUSD and AYSO leadership are NOT CLEAR if all the soil dumped at Ladera Linda WAS or WAS NOT TESTED before hand?

I note that Avocet's report reads as follows:

- On April 8 and 9, 2015, approximately 1,020 cubic yards of soil from grading operations at a residential property in Torrance (Section 3 2.3) were imported and end-dumped at the Site. Avocet understands that PV AYSO obtained PVPUSD's approval prior to importing the Torrance soil and that a PVPUSD representative inspected the soil beforehand. Moreover, PVPUSD used approximately ten truckloads of the same soil for its own purposes, albeit not in the vicinity of Ladera Linda Fields.

So, how does AYSO/PVPUSD data compare to yours/DTSC data? Did AYSO/PVPUSD test for asbestos? Using what method?

Response: *The prior testing of imported soil is not relevant to the focus of the PEA. For information regarding the initial data submission by PVPUSD and PV AYSO, see Response to Comment 5.3. Testing was completed by Alta Environmental using PLM method (USEPA Method 600 R-93/116)/ see PEA Report Section 4.1.1.*

Comment 20 – Dan Cooper

I am writing to express concerns about the impact of recent soil dumping at Ladera Linda Park in Rancho Palos Verdes to rare and endangered species in the area.

I have been monitoring two protected bird species, the California gnatcatcher and the coastal cactus wren, for various clients in the Forrestal/Ladera Linda area since the mid-2000s. As recently as 2015, I documented two separate territories of the Federally-Threatened California Gnatcatcher in scrub directly adjacent to the northwestern edge of the soccer field where the soil was dumped (data to Palos Verdes Peninsula Land Conservancy; please contact them directly).

The top of Forrestal Dr. is a world-famous spot for observing the gnatcatcher, and I have led clients from Germany, the U.K. and from across the U.S. to this location to get them the species for their list. Below is a screen-shot of California gnatcatcher locations submitted to eBird (www.ebird.org); note that each location represents from one to dozens of individual sightings.

(picture attached)

Response: *Please see DTSC's General Response 4 for the ecological risk evaluation.*

Comment 21 – Jerry Duhovic

The below email is a sample of requests I'm getting from residents asking that the Rancho Palos Verdes City Council, or alternatively individual Councilmembers, endorse and initiate a request to DTSC for an extension of the comment period to respond to DTSC's Preliminary Endangerment Assessment (PEA). The consensus seems to be that a late January due date would be appreciated.

With the holidays upon us, the current limited time frame to respond, and in light of the extended time period it took for DTSC to complete its analysis and review, I am willing to lend my support/signature to such a request.

I am doing so as an individual Councilmember and not on behalf of the Rancho Palos Verdes City Council, the City of Rancho Palos Verdes or any of its employees, agents, contractors, Commissions or Committees. Additionally, please see the disclaimer below my signature line.

(Email attached)

We have great concerns about the Ladera Linda field and its safety.

These are concerns about the known pesticides and other contaminants in the soils dumped onto the field April 2015.

The fields are used by the entire peninsula whether for nature hiking or soccer. We are asking that you help to get an extension from DTSC for the comment period now ending Dec. 8th.

We are asking for that extension to apply until the end of January in the spirit of public participation.

Response: *Please see DTSC's General Response 6 regarding accepting comments by December 15, 2017.*

Comment 22 – Susan Brooks

Thanks so much for the presentation last week. It was a pleasure to meet you and your team.

Due to the holidays and the short comment time afforded after your Nov. 16th report was presented to the public, I am personally requesting you extend the comment period as requested by member of the public.

I plan to request this matter be placed on our next Council agenda in the form of a letter. However, the next meeting isn't until Dec. 5 th.

Residents asked several questions, some were unanswered. I believe it is prudent to give them and our new Council an opportunity to look at the information presented for us to consider the appropriate response.

Response: Please see DTSC's General Response 6 regarding accepting comments by December 15, 2017.

Comment 23 – Derek Gable

I have been following the investigation of the DTSC and the Ladera Linda field. Thousands of young children play soccer at the field.

In April 2015 85 truckloads of man made pesticides and construction debris were imported to Ladera Linda without cause.

We are asking you to extend the comment period until Jan. 30,2017 so that we can review the documents that you have posted online.

The only line of communication we'd had with DTSC is one meeting off site of Ladera Linda.

We would appreciate the extension and ability to discuss this with you in the spirit of public participation that DTSC stands by.

Response: Please see DTSC's General Response 6 regarding accepting comments by December 15, 2017.

Comment 24 – Mary Beth Woulfe

We are requesting a time extension of the comment period to allow us to review the following document as it relates to The City of Rancho Palos Verdes NCCP/HCP and the presence of federally listed species:

PRELIMINARY ENDANGERMENT ASSESSMENT (PEA) REPORT Ladera Linda Site 32201 Forrestal Drive Rancho Palos Verdes, California 90275 (DTSC Site Code 401759-00) dated, November 3, 2017

Response: Please see DTSC's General Response 6 regarding accepting comments by December 15, 2017.

Comment 25 - Scott Burack

We are asking the DTSC to extend the public comment period until at least January 30, 2017 so that we can review all of the documents that you have posted online.

The only line of communication we have had with DTSC to date, is one meeting off-site of Ladera Linda.

We would appreciate this extension and ability to discuss this with you in the spirit of public participation that DTSC stands by.

Response: Please see DTSC's General Response 6 regarding accepting comments by December 15, 2017.

Comment 26 – Richard Sherman

I am asking you to extend the comment period on the Ladera Linda issue until Jan. 30,2018.

We need more time to review the documents that you have put together.

Response: Please see DTSC's General Response 6 regarding accepting comments by December 15, 2017.

Comment 27 – Garrett Unno

I am a resident of Palos Verdes Estates. I was told that you have the ability to extend the public comment period for the Ladera Linda field investigation. As such, I request the public comment period be extended to January 30. There is much to review and understand and the community needs more time. My own children spent many hours playing soccer on that field.

If an extension is not possible, I would appreciate an explanation of the circumstances that require that public comment be closed today. Thank you for your efforts in this important investigation.

Response: Please see DTSC's General Response 6 regarding accepting comments by December 15, 2017.

Comment 28 - Barry Yudess

Comment 28.1 - We have been following the ongoing investigation by the DTSC regarding the soils that were illegally dumped at the Ladera Linda Field in Rancho Palos Verdes, California.

Thousands of young children play on that field annually, including my own kids and their friends.

As you know, back on April 2015 at least 85 truck-loads of man-made pesticides and construction debris was imported to Ladera Linda without cause. The pesticides, DDT, asbestos and other construction debris has contaminated our fields and needs to be properly removed and cleaned.

We are asking the DTSC to extend the public comment period until at least January 30, 2017 so that we can review all of the documents that you have posted online.

The only line of communication we have had with DTSC to date, is one meeting off-site of Ladera Linda.

We would appreciate this extension and ability to discuss this with you in the spirit of public participation that DTSC stands by.

Response: Please see DTSC's General Response 6 regarding accepting comments by December 15, 2017. Please note that DTSC disagrees that the imported soil needs to be removed because it does not pose a significant risk to human health, or a hazard to ecological receptors as explained in DTSC's General Responses 3 and 4.

Comment 28.2 - Just wanted to remind you about the PVP Land Conservancy letter sent to RPV regarding Ladera Linda. The imported soils at Ladera Linda were covered with plastic that when windy blew directly onto the Forrestal Preserve. The conservancy sent RPV a letter of concern to RPV (See attached).

Dirt from the 24,000 cubic ft. berm will continue to blow onto the protected reserve.

The conclusion to draw is that the contaminants found in the imported soils will also blow right over onto the protected and Critical Habitat at Forrestal Preserve when and if uncovered again and continuously.

I'm sure you haven't had time to do an indepth investigation but might want you to be aware that the 24,000 cubic foot berm of imported soils was identified by Alta Environmental to have high levels of Title 22 Metals.

In July 2015 the PVPLC did soil testing of the adjacent Portuguese Bend native soils as a baseline.

Here's the comparison data for these contaminants--

Alta Environmental tested in November 2015 for the PVPUSD. Alta sent an email to Lydia Cano, PVPUSD, due to the concerns about this data result and wanted further investigation. But PVPUSD did not take any action.

The native soils should match up as a continuous property.

But the soil test results are dramatically different.

RPV data is taken from the PVPLC report to RPV 2015 Comprehensive Management Report - Page 283

Bottom line- Does RPV want this soil within the city borders?

Alta Report	11/20/2015	NC-1	NE-1	NW-.05	SC-1	SE-.05	SP	SW-1
LLUF Results								
Barium	mg/kg	178	111	258	30.7	67.8	843	129
Chromium	mg/kg	30.6	16.5	32.7	5.58	11.9	41.6	20.1
Cobalt	mg/kg	10.1	5.47	9.18	ND	3.94	10.6	5.64
Nickel	mg/kg	34.2	18.9	29.7	3.58	11.8	35.6	17.7
Vanadium	mg/kg	65.6	36.5	68.1	11.1	24.3	70.9	36.9
Zinc	mg/kg	62.9	55.7	67.4	15.4	33.7	77.7	43.1
Dudek Results	7/17/15	PB #1	PB #2	PB #3				
RPV Portuguese Bend Preserve								
Barium	mg/kg	1.83	1.86	.81				
Chromium	mg/kg	ND	ND	ND				
Cobalt	mg/kg	.14	.12	.18				
Nickel	mg/kg	5.18	4.59	2.57				
Vanadium	mg/kg	.65	1.06	0.61				
Zinc								
No samples								

The consequence is that the tainted soils of the import will effect the protected critical habitat and wildlife at the preserve.

Ladera Linda Import Soil vs. next door property Portuguese Bend Reserve 2015

Response to Comment: See DTSC's General Responses 3 and 4 regarding the human health and ecological screening evaluation associated with metals detected at the imported soil.

With regards to the acceptance of the imported soil by Ranchos Palos Verdes, it is not relevant to the purpose, content or focus of the PEA.

Comment 29 – Lora Ackermann

As a parent and active member in our community, I am asking you to please extend the comment period on the Ladera Linda issue until Jan. 30, 2018. We need more time to review the documents that you have put together.

Response: Please see DTSC's General Response 6 regarding accepting comments by December 15, 2017.

Comment 30 - Joshua Davidson

My wife and I have been following the investigation of the DTSC and the Ladera Linda field. Thousands of young children play soccer at the field, including our 9 year-old son. Many of our friends also have children who play or practice at Ladera Linda at least two times a week.

I am also a physician who cares for patients with respiratory disease. I've seen firsthand the impact of asbestos on patients' lungs -- I do not want my children or our community's children exposed to asbestos or other airborne agents/chemicals.

In April 2015, 85 truckloads of material that contained pesticides and construction debris were imported to Ladera Linda without cause. We are asking you to extend the comment period until January 30, 2017, so that we can review the documents that you have posted online.

We would appreciate the extension and ability to discuss this with you in the spirit of public participation that DTSC stands for.

Please think of the children involved here. This is not an industrial waste site. We're talking about a series of recreational and soccer fields that our children use regularly. These fields are adjacent to hiking and mountain biking trails.

Response: Please see DTSC's General Response 6 regarding accepting comments by December 15, 2017 and General Responses 3 and 4.

Comment 31 – Lois Karp

Please extend the comment period for the Ladera Linda investigation until January 20, 2018 so that the public can have a fair opportunity to review and comment on the documents that were just made available.

Response: *Please see DTSC's General Response 6 regarding accepting comments by December 15, 2017.*

Comment 32 – Clare Carron

Due to the fact that your comment period regarding your investigation of the Ladera Linda field has been so short, I would like to request that you extend this comment period until January 30, 2018.

By so doing all concerned parents will have sufficient time to review the documents and get their comments to you.

Response: *Please see DTSC's General Response 6 regarding accepting comments by December 15, 2017.*

Comment 33 - Chailaiwan Mueller

As a resident of Rancho Palos Verdes who resides near the Ladera Linda Community Center and often walk through the soccer fields during my outdoor activities, I would like to request that you extend your comment period to the end of January 2018. The short two week comment period of two weeks sandwiching between Thanksgiving and Christmas Holidays does not allow sufficient time for the public to pay attention, review information, and submit thoughtful questions and comments on this very important investigation. I would like additional time to carefully understand the possible presence of asbestos and other toxic materials such as pesticides in the fill materials and how they may impact our soil and water under certain storage conditions.

If hope you will grant an extension to ensure residents are given sufficient time to consider information that is important to their health. I am sure you would do your very best to fulfill you agency's mission of putting the health of Californians first.

Response: *Please see DTSC's General Response 6 regarding accepting comments by December 15, 2017 and General Responses 3 and 4 with respect to protection of public health and the environment.*

Comment 34 - April Sandell

I am requesting the "subject" related meetings are extended in order to satisfy the public hunger for the whole story which originated sometime earlier, for some unknown reason , someone dumped the soil on RPV / Ladera Linda site.

Response: Please see DTSC's General Response 6 regarding accepting comments by December 15, 2017.

Comment 35 - Jeannette Jacobson

Comment 35.1 - Thank you for taking the time to address the community concerns at the Ladera meeting last night.

I found it to be very productive and informative.

It also highlighted the need for this project to come to its end.

As Dr. Sanford so eloquently stated while comparing your investigation to his prostate biopsies, you need to ask yourselves what *his intentions* are. After multiple investigations by several different, independent, qualified firms have reached the same conclusion; no human health hazards exists by the soil brought in to level the fields, why is he and his group not accepting these results?

Consider this, if you are having health issues and several different, independent of one another, qualified Doctors all provide you the same results; you're OK, why would the first doctor insist on continuing testing you? Is there a potential that he may be motivated by a different concern than your health?

You also need to ask yourselves; why would an organization run by *unpaid volunteers* want to put their own children at risk?

No parent would do that! Why is it that the most vehemently opposed to opening the fields back to AYSO have no children. Does that seem like a glaring difference to anyone else?

This brings the old adage "No good deed goes unpunished" to a whole different level of insanity. There is asbestos in the world around us, anyone living in a house built in the 50's have a high probability of living with asbestos!

I applaud the community for their efforts in keeping it safe for everyone. However, this is no longer about keeping it "safe".

If that was truly the only agenda – this would now be put to rest after 5 investigations all concluding it is indeed safe.

Please abide by your plan to finalize your report once the public comments expire on December 8th.

Response: Comment noted.

Comment 35. 2 - I've been a board member of Palos Verdes AYSO for the last 10 years. It has come to my attention that a small, very vocal opposition group is yet again trying to prolong the Ladera Linda investigations by extend the deadline for public comments.

The Ladera Linda site has been investigated and assessed numerous times with the exact same conclusions; the site poses no risk to human health nor the environment. I request that the DTSC close public comment on December 8 as scheduled. I would like the matter closed immediately with no further action.

Response: *Comment noted.*

Comment 36 – Alan Lem

Thank you and your staff for all your time & professional work!! I have two daughters, aged 21 & 14 years old who played AYSO Soccer for years. Their AYSO Soccer experience greatly enriched their character & confidence. I'm sure most of those who went through the program share the same sentiment.

We live in a community. We are a community. This place we are talking about is called Ladera Linda Community Center.

Moving to a neighborhood close to a public park, public school or community center and complain about traffic, parking & noise is absurd & selfish!! These areas belong to the greater community. (If you don't like it, I have a very simple solution. Move to a neighborhood far away from these areas so you don't have to complain about them.) This is a very sad & unfortunate situation. A lot of time & money was already spent on this.

Four independent tests were conducted and all four results show that the soil is clean. A complaint was filed that got your agency involved. Your tests once more proved that the soil is clean and it poses no risks whatsoever to human health & environment. There is no contamination of any kind!!

Now that's FIVE tests. I can't believe that the complainants are still not satisfied. Are they questioning your findings as well??

I now believe that these false accusations, under the pretext of concerns for the youth & community is really part of a broader agenda to rid of the youth & community from this public space. Why do I say that?

First, you have the alleged "contaminated" soil issue. Second, a community movie night was shut down at Ladera Linda. Third, now they are trying to enforce a noise ordinance. As you can see, the pattern is very clear.

To deny & deprive the community & youth from playing sports & enjoying these public areas is just wrong!!
Contaminated soil? That's Fake News!!

The Real News- the soil is clean & safe!!

I say let's MOVE ON and give the space back to the youth & community!!

Response: *Comment noted.*

Comment 37 - Julie Smalling

I am unable to attend the public meeting but wish to express my **support** of the findings of DTSC's Preliminary Endangerment Assessment for the Ladera Linda School / Soccer Fields.

I am pleased that the findings show the soil to be uncontaminated and not dangerous. I look forward to the re-opening of these fields for the benefit of the community.

I live very near the fields and my children play AYSO soccer.

Response: *Comment noted.*

Comment 38 - William Patton

I certainly second the suggestion made by Mr. Ruona.

The DTSC has done an excellent and exhaustive investigation and published their findings: no health problem whatsoever!

It is now time to end the situation and hopefully that is what will occur on Dec 08.

Response: *Comment noted.*

Comment 39 – David Koch

I agree with Mr. Patton and Mr. Ruona.

Considering the taxpayers expense that has been incurred and your findings of no contamination it is time to end this investigation. Enough is enough. Let's let the AYSO kids have a field to play on.

Response: *Comment noted.*

Comment 40 - David Potter

I wanted to take the time to thank you for your efforts with the issue of the non-contaminated dirt at the Ladera Linda site. I have lived in the area since I was a child and my children currently play soccer at the Ladera Linda Fields.

Throughout the process it is my opinion is that the DTSC handled the situation well and I have not had a second thought while I take walks and ride my mountain bike in the area.

It appears the many environmental test have reached the same conclusion that the dirt is indeed not contaminated.

I think it is time that we put this issue behind us for good and finally provide clearance so we can all get back enjoying life without making dirt political.

Please let me know if you have any questions.

Response: *Comment noted.*

Comment 41 – Robert Murdock

Thank you and your DTSC colleagues for the detailed and professional review you presented at the meeting, and request that you finalize your report on December 8th as planned.

I am a supporter of Palos Verdes AYSO, my kids having played AYSO soccer for almost 15 years. The Ladera Linda site has been thoroughly investigated and assessed with a determination that the site poses no risk whatsoever to human health and the environment. I request that the DTSC close public comment on December 8 as scheduled and not extend this or any deadlines, closing the matter immediately with no further action. It is time to let the kids play soccer.

Response: *Comment noted.*

Comment 42 – Gregg Ferguson

Regarding the testing of the soil at the Rancho Palos Verdes Ladera Linda site, the Palos Verdes AYSO and PVPUSD have met all requirements from the DTSC for testing of the imported soil for hazardous materials and have not been found to contain any beyond the allowable amount.

It is my opinion that no further action should be required due to the above findings. I request that the DTSC close the matter and rescind the Post and Fence order.

I am a resident of Rancho Palos Verdes. The imported dirt at the Ladera Linda site has been thoroughly investigated and tested and it has been determined that the fill material poses no risk to human health or the environment. I request that the DTSC issue final

findings and not extend any deadlines. I would like the matter closed as soon as possible with no further action. The School District has been forced to spend educational funds for far too long on this matter.

Response: *Comment noted.*

Comment 43 - Craig Handjian

I am writing to you today as a long time, resident, coach, and volunteer in our RPV community. I'd like to take a moment and ask you to close out the inquiry with AYSO and Ladera Linda. I believe that no further action is required for the Ladera Linda site, that PV AYSO has satisfied its obligations under the Consent Agreement, and that the Post and Fence Order should be rescinded. It is time for us to move forward.

Appreciate your attention into the matter.

Response: *Comment noted.*

Comment 44 - Damian Capozzola

I write to express my concern and frustration with the continued refusal to deem resolved the issues at Ladera Linda.

PV AYSO, representing hundreds of volunteers and thousands of players through the Palos Verdes Peninsula, is being harassed for no valid reason. After yet another round of extensive soil and air sampling documented in the PEA Report, the PEA Report concludes that no further action is warranted or needed at the Site because there are no hazardous substances present. More than 100 soil samples and analyses have confirmed that there are no contaminants present that pose any health risks to the public or the environment. Yet those who want to see problems where none exist continue to make things unnecessarily difficult! PV AYSO and PVPUSD have spent hundreds of thousands of dollars to perform countless tests to demonstrate that the soils imported in April of 2015 are clean and free of any hazardous substances. Any further delay will just harm PV AYSO and its players. It is time to move forward and have DTSC confirm that no further action is required at the Site.

I support the Palos Verdes AYSO. Why do these issues at Ladera Linda continue to linger?! The Ladera Linda site has been thoroughly investigated and assessed, and it has been determined that the site poses no risk at all to the environment or human health. I request that the DTSC close public comment on December 8 as scheduled and not extend this or any deadlines. I would like the matter closed immediately with no further action. Please let's move forward and let the kids play soccer!

Response: *Comment noted.*

Comment 45 - Wendy Murdock

I am sending this to you to please ask you to close the matter of the complaint filed for the Ladera Linda site, as the dirt has tested clean and safe. PV AYSO has satisfied its obligations under the Consent Agreement. Please rescind the Post and Fence Order.

Response: *Comment noted.*

Comment 46 - Steve Wollman

It is my understanding that all of the tests performed by the DTSC yielded negative results in the testing for harmful substances in the dirt located adjacent the Ladera Linda Park Soccer fields and that the Palos Verdes region 10 AYSO organization has satisfied all of its obligations under it's consent agreement. As such, I strongly feel that the DTSC should close the matter that has already cost at least two local organizations, both of which support children, hundreds of thousands of dollars and allow Region 10 AYSO to remove the posts and fencing surrounding this area.

Response: *Comment noted.*

Comment 47 – Bob Caseres

I am a supporter of Palos Verdes AYSO/resident of Rancho Palos Verdes. The Ladera Linda site has been thoroughly investigated and assessed and it has been determined that the site poses no risk whatsoever to human health and the environment. I request that the DTSC close public comment on December 8 as scheduled and not extend this or any deadlines. I would like the matter closed immediately with no further action. It is time to move on and let the kids play soccer. A tremendous amount of money has been spent by not only AYSO but the Palos Verdes school district.

I am the Regional Commissioner for Region 10 AYSO soccer.

Our all-volunteer organization, nonprofit organization, has spent an excessive amount of money in the process.

The Ladera Linda site has been proven clean by various companies including the DTSC and it has been determined that the site poses no risk whatsoever to human health or the environment. I request that the DTSC close the public comment on December 8th as scheduled and not extend this or any deadlines. I respectfully request this matter be closed immediately with no further action.

600 plus volunteers are dedicated to providing soccer to the kids of Palos Verdes and it sit time to move on and let the kids play soccer.

Response: *Comment noted.*

Comment 48 – Shannon Mastan

Having attended the DTSC findings meeting last month it seems pretty clear to me that there are no issues with the dirt at Ladera Linda fields. There is no risk for humans or animals to be on or near the site. Because of this please close the public comment time on December 8th as planned. There should be no need to extend comment for issues that simply do not exist.

I also, personally, want to thank the DTSC for your professional stance at the public meeting. Everyone had a fair time to issue their concerns and have had this time for months previous.

Please close this matter with no further action. It is time for our cities to heal and see our children enjoying time outdoors playing on a beautiful field that for over a year the community has not been able to access because of an issue that DOES NOT exist.

Response: *Comment noted.*

Comment 49 - Alan Kossoff

I have been a volunteer for Palos Verdes AYSO for the past 15 years. It is a wonderful non-profit organization that provides recreational and competitive soccer programs for our youth. The Ladera Linda Site has been investigated for about 2 years and every test has shown that the dirt is clean. The Site poses no risk to our health or to the environment. Please close the public comment period on December 8, 2017, and issue the No Action letter immediately. It is time for the DTSC to close this matter and for everyone to move on

Response: *Comment noted.*

Comment 50 – Jesse Camp

I am a long-time supporter of PV AYSO and youth sports in general. Both of my kids played in AYSO and it made for many memorable experiences. I have been following the Ladera Linda dirt issue since the beginning and feel the issue should be immediately closed, but understand that it must remain open until the investigation is complete. I request that the DTSC close the public comment deadline on December 8th as scheduled. Please put this issue to rest and give the kids back their play-space.

Response: *Comment noted.*

Comment 51 – Molly Camp

I played AYSO as a kid and both of my kids played AYSO in Palos Verdes. Please help us put the dirt issue to bed and let our kids play at Ladera Linda again. Please do not extend the public comment period on this issue, let it close as scheduled on Dec 8th.

Response: *Comment noted.*

Comment 52 – Larry Manth

I am a supporter of Palos Verdes AYSO. The Ladera Linda site has been thoroughly investigated and assessed and it has been determined that the site poses no risk whatsoever to human health and the environment. I request that the DTSC close public comment on December 8 as scheduled and not extend this or any deadlines. I would like the matter closed immediately with no further action. It is time to move on and let the kids play soccer

Response: *Comment noted.*

Comment 53 – Thomas and Elizabeth Coleman

We are supporters of Palos Verdes AYSO and residents of Rancho Palos Verdes. The Ladera Linda site has been thoroughly investigated and assessed and it has been determined that the site poses no risk whatsoever to human health and the environment. We request that the DTSC close public comment on December 8 as scheduled and not extend this or any deadlines. We would like the matter closed immediately with no further action. It is time to move on and let the kids play soccer.

Response: *Comment noted.*

Comment 54 - Dawn Donatoni

I am a supporter of Palos Verdes AYSO and a resident of Rancho Palos Verdes. The Ladera Linda site has been thoroughly investigated and assessed and it has been determined that the site poses no risk whatsoever to human health and the environment. I respectfully request that the DTSC close public comment on December 8 as scheduled and not extend this or any deadlines. I would like the matter closed immediately with no further action. It is time to move on and let the kids play soccer.

Response: *Comment noted.*

Comment 55 – Graham Mac Innis

I am a supporter of Palos Verdes AYSO. The Ladera Linda site has been thoroughly investigated and assessed and it has been determined that the site poses no risk whatsoever to human health and the environment. I request that the DTSC close public comment on December 8 as scheduled and not extend this or any deadlines. I would like the matter closed immediately with no further action. How much more money do we have to waste on this non-issue? It is time to move on and let the kids play soccer.

Response: *Comment noted.*

Comment 56 - Angela and Marc Panetta

My husband and I are 20 year residents of Rancho Palos Verdes with two school-aged children. Our family has also been involved with Palos Verdes AYSO for about the past 10 years. We have enjoyed being a part of this wonderful community and live here because of the excellent school district and easy access to many outdoor activities. It is an expensive place to live but we are willing to make the sacrifice in order to provide our kids with the opportunities to learn and grow in a safe, clean and healthy environment.

The Ladera Linda dirt investigation has been a major source of contention and we are so relieved to learn that the soil is clean and look forward to the soccer fields reopening and letting the kids play there again. However, it has come to our attention that a small group of residents still want to debate this issue. We need this matter to close immediately to stop the senseless waste of money that is straining both our school district's budget, time and resources as well as that of AYSO. AYSO is run entirely by volunteers and they simply do not have the resources to continue fighting this battle which has already been settled by the DTSC.

We respectfully request that the DTSC close public comment on December 8 as scheduled and not extend this or any deadlines. We would like this matter closed immediately with no further action. We all want to move on and let the kids play soccer and for district resources to be put towards educating our children.

Response: *Comment noted.*

Comment 57 - Daphne Fujisawa

I am a supporter of Palos Verdes AYSO/resident of Rancho Palos Verdes. The Ladera Linda site has been thoroughly investigated and assessed and it has been determined that the site poses no risk whatsoever to human health and the environment. I request that the DTSC close public comment on December 8 as scheduled and not extend this or any deadlines. I would like the matter closed immediately with no further action. It is time to move on and let the kids play soccer.

Response: *Comment noted.*

Comment 58 - Andrew and Tara Shao

I'm emailing you regarding the situation with the soccer fields at Ladera Linda. My wife, Tara and I both believe that the site poses no risk to health or the environment. Our son plays AYSO (and has done so for six years now) and we are RPV residents. We respectfully request that the DTSC close the public comments on December 8 as planned and not drag the issue out any longer. The fields are fine and it's time to move on and let the kids enjoy the games.

Response: *Comment noted.*

Comment 59 - Brent Daniel

I have been a resident of Rancho Palos Verdes since 2005 and have volunteered for AYSO for over 10 years. I am writing to request that the DTSC does **NOT** extend the comment period for the clean dirt at Ladera Linda and abides by the plan to issue a no further action outcome immediately.

It pains me that I even have to send this email. This has been a very difficult time for PV AYSO as a small group of people that are harboring ill will toward our school district met a small group of people that don't want AYSO to exist in their neighborhood. We have extinguished every penny that our non profit organization could come up with over this. Any extension would put additional hardship on the program and further harm our children by taking away more opportunities. I am disheartened by what has transpired and looking forward to this being behind our community so we can further our volunteer activities and serve our youth properly

Response: *Comment noted.*

Comment 60 – Richard McCallister

I am a resident of Rancho Palos Verdes and a supporter of PV AYSO.

It seems to me that the Ladera Linda site has been thoroughly investigated and therefore I believe that the DTSC should close public comment on December 8 and allow the children to play soccer. Further extensions will not accomplish anything but waste time and money.

Response: *Comment noted.*

Comment 61 - Jennifer Cruikshank

I understand the DTSC is considering extending the December 8 deadline for public comment regarding the Ladera Linda site. I am in favor of closing public comment with no further action.

Certainly there has already been ample time for public comment. As a resident of Rancho Palos Verdes that lives near Ladera Linda and an AYSO family who son had played on the fields there many years, I have seen this issue—with all its speculation and accusations--divide our community. Extending it will only cause further harm. Nothing new can come out of an extension except further divisiveness; it is time for all of us to move on.

Response: *Comment noted.*

Comment 62 - Gilbert Yu

I am a resident of Rancho Palos Verdes and request that the DTSC close public comment on the Ladera Linda site on Dec 8 without extension. The site has been thoroughly investigated and has been found to pose no health risk nor risk to the environment. It has been investigated sufficiently to show the safety of the soil and the matter should be closed immediately with no further action.

Response: *Comment noted.*

Comment 63 – Dawn Murdock

I am a supporter of Palos Verdes AYSO, with all four of my kids having played AYSO soccer. The Ladera Linda site has been thoroughly investigated and assessed with a determination that the site poses no risk whatsoever to human health and the environment. I request that the DTSC close public comment on December 8 as scheduled and not extend this or any deadlines, closing the matter immediately with no further action. It is time to let the kids play soccer.

Response: *Comment noted.*

Comment 64 - Elizabeth Parker

I am a supporter of Palos Verdes AYSO/resident of Rancho Palos Verdes. The Ladera Linda site has been thoroughly investigated and assessed and it has been determined that the site poses no risk whatsoever to human health and the environment. I request that the DTSC close public comment on December 8 as scheduled and not extend this or any deadlines. I would like the matter closed immediately with no further action. It is time to move on and let the kids play soccer.

Response: *Comment noted.*

Comment 65 - Whitney Cicero

I am a supporter of Palos Verdes AYSO/resident of Rancho Palos Verdes. The Ladera Linda site has been thoroughly investigated and assessed and it has been determined that the site poses no risk whatsoever to human health and the environment. I request that the DTSC close public comment on December 8 as scheduled and not extend this or any deadlines. I would like the matter closed immediately with no further action. It is time to move on and let the kids play soccer. I have personally coached in AYSO for 6 years and find this to be disruptive to the organization, volunteers and children.

Response: *Comment noted.*

Comment 66 – Kev Toumaian

I am a resident of Rancho Palos Verdes.

I have read the PEA report and community update. Based on those documents it is clear that the Ladera Linda site has been thoroughly investigated and assessed and it has been determined that the site poses no risk whatsoever to human health and the environment.

I request that the DTSC close public comment on December 8 as scheduled and not extend this or any deadlines. I would like the matter closed immediately with no further action. It is time to close this investigation and provide open access to Ladera Linda.

Response: *Comment noted.*

Comment 67 – Alyson McFerson

I am a resident of Rancho Palos Verdes and a supporter of Palos Verdes AYSO. I played AYSO when I was a child and it brings me great pleasure to watch my children participate in this great soccer program. It also saddens me beyond belief that a few individuals have tried to destroy a program that simply wants children to get some exercise and play soccer. After the DTSC findings determined the Ladera Linda site poses no risk at all to human health and the environment, I thought the matter was closed. However, weirdly, it doesn't appear to the case. Therefore, I vehemently oppose any extension of the public comment period and ardently request that the DTSC close the period as scheduled on December 8. AYSO, the school district, and the community have been through enough and it is time to move on and let the kids play soccer on the beautiful fields of Palos Verdes.

Response: *Comment noted.*

Comment 68 - Virginia Silvestri

I am a supporter of the Palos Verdes AYSO and a resident of Palos Verdes Estates. Through many different assessments and repeated diggings at the site it has been found that Ladera Linda poses no risk at all to human health and our environment. I ask that the DTSC close this public comment on December 8 as scheduled and not extend any deadlines at all. It is has been far too long that the children have been able to play soccer on this beautiful soccer field.

Response: *Comment noted.*

Comment 69 – Makenna Toumaian

I am a supporter of Palos Verdes AYSO and a resident of Rancho Palos Verdes. I request that the DTSC close public comment on December 8th as scheduled and not extend this or any other deadlines. It has been shown that the site poses to risk to anyone's health, especially the health of the children, or the environment, so I therefore feel that it is not necessary to extend the comment period any longer.

This investigation has cost both a lot of time and money that could have been spent towards the benefit of children in our community, so I ask that we please waste no more of these precious resources on a matter that has already been resolved, and let the children play soccer. I am a current AYSO coach, player, and board member, so I know from my personal experiences how huge of an impact the program can have on young players' lives. We need to end this investigation so that the focus of AYSO can turn back towards the children and away from the negativity of this situation.

Response: *Comment noted.*

Comment 70 – Tim DeMoss

I am a supporter of Palos Verdes AYSO and a resident of Rancho Palos Verdes. My address is 28518 Vista Madera, Rancho Palos Verdes CA 90275. My son Jace plays soccer throughout the year at Ladera Linda and other soccer fields in Rancho Palos Verdes. The Ladera Linda site has been thoroughly investigated and assessed and it has been determined that the site poses no risk whatsoever to human health and the environment. I request that the DTSC close public comment on December 8 as scheduled and not extend this or any deadlines. I would like the matter closed immediately with no further action. It is time to move on and let the kids play soccer.

Response: *Comment noted.*

Comment 71 – Haley Toumaian

I am a resident of Rancho Palos Verdes. I have read the PEA report and community update, and based on those documents it is clear that the Ladera Linda site has been thoroughly investigated and assessed. It has been determined that the site poses no risk whatsoever to human health and the environment. I request that the DTSC close public comment on December 8 as scheduled and not extend this or any deadlines. I would like the matter closed immediately with no further action. It is time to close this investigation and provide open access to Ladera Linda.

Response: *Comment noted.*

Comment 72 - Edwin Jacobson

I am currently a junior studying aerospace engineering at Purdue University, but grew up playing AYSO in Palos Verdes. It is a shame this many resources have been taken away from other far more pressing issues to deal with a few residents trying to take away one of my favorite childhood memories.

I am a supporter of Palos Verdes AYSO Region 10 soccer program. The Ladera Linda site has been thoroughly investigated and assessed and it has been determined that the site poses no risk whatsoever to human health and the environment. I request that the DTSC close public comment on December 8 as scheduled and not extend this or any

deadlines. I would like the matter closed immediately with no further action. It is time to move on and let the kids play soccer.

Response: *Comment noted.*

Comment 73 - Dean Kanemitsu

I am a resident of Rancho Palos Verdes and a supporter of Palos Verdes AYSO. Based on the testing performed on the Ladera Linda site and the extensive investigation and review of the DTSC, the Ladera Linda site has been determined to pose no risk to human health and the environment.

This investigation needs to close so that the children can start playing soccer and that both PV AYSO and the PVPUSD can focus their resources on the children of the Palos Verdes Peninsula. As such, I request that the DTSC close public comment on December 8 as scheduled and not extend this or any deadlines, and for the matter to be closed immediately with no further action.

Response: *Comment noted.*

Comment 74 – Casey Coogan

in AYSO soccer for 10 years with my children. My son played 4 seasons at Ladera Linda, until the fields were closed right before our championship game. At that time, a resident nearby made demands to stop the kids from playing at the field, going as far as threatening legal action against the organization. As I understand it, all the necessary testing has demonstrated that the soil is 100% safe, and the continued delays are unnecessary. My wife has been an active member of the Peninsula Education Foundation for years as well, working to raise funds for the school district each year, to supplement the children’s education in PV. Apparently, the cost of maintaining the fencing around the “clean” soil has cost the district \$156,000, which could have gone to much better use to help the children. It’s time to end the public comment period on December 8, to let the kids get back to using their fields and stop wasting the school district’s money. Those who are continuing this fight to keep the fields closed, also benefit from the property values that our excellent schools maintain. It’s not right to continue this. It’s time to re-open the fields.

Response: *Comment noted.*

Comment 75 – Evelyn Callanan

I am a supporter of Palos Verdes AYSO/resident of Rancho Palos Verdes.

Please do NOT extend the public comment period. There is absolutely no valid reason to do so. There is nothing wrong with the dirt at Ladera Linda. The kids are being impacted. Let the kids play soccer.

The Ladera Linda site has been thoroughly investigated and assessed. The site poses no risk whatsoever to human health and the environment. I request that the DTSC close public comment on December 8 as scheduled and not extend this or any deadlines. I would like the matter closed immediately with no further action.

Response: *Comment noted.*

Comment 76 - Ken Brennan

Please close this matter. I am a parent of an AYSO kids that would to play soccer at his "home field". It's done, the matter is closed. This is a waste of time and money for a result we already knew.

Response: *Comment noted.*

Comment 77 – Jean-Michel Maarek

We write in regard to the Ladera Linda site and park. We are long time residents of Rancho Palos Verdes, have volunteered for PV AYSO for more than 15 years, and continue to support this organization which promotes an active lifestyle in a fun atmosphere for the youth of our city. At a time when childhood obesity is at an all time high and a nationwide health crisis, opportunities for our children to play outside and engage in sports should be encouraged and supported.

The Ladera Linda site has been thoroughly investigated and assessed. It has been determined that the site poses no risk for human health and the environment. Keeping the site off-limit to the children of our city deprives them of a safe area to be active and limits opportunities for the AYSO volunteers, all of whom are Rancho Palos Verdes parents and grandparents to be involved in a community-based organization and to build ties that strengthen our community.

We respectfully request that the DTSC closes public comment on December 8 as scheduled and does not extend this or any deadline. We would like the matter settled immediately with no further action. It is time to reopen the park and let the children of Rancho Palos Verdes play soccer with the support of the PV AYSO volunteers

Response: *Comment noted.*

Comment 78 – Dean and Omera Olson

I have been a Coach and supporter of Palos Verdes AYSO and a resident of Rancho Palos Verdes for over 30 years. I believe the Ladera Linda site has been thoroughly investigated and assessed safe to human Health and the environment. I have 4 children who have attended the PV school system, and I can say that the money wasted on this

could have been well used for school expenses. I request that the DTSC close public comment on December 8 as scheduled and not extend this or any deadlines. It is time to close this matter and let my children and their children play soccer.

Response: *Comment noted.*

Comment 79 – Jamie L. MacDougall

I am a resident of the beautiful Palos Verdes Peninsula, and am also a long-time supporter of Palos Verdes AYSO...not only did my kids play soccer for years in PV, but I am still actively refereeing as well. It has come to my attention that the final soils report for the Ladera Linda site has been published and after a thorough investigation and assessment, it has been determined that the site poses no risk whatsoever to human health and the environment. I have followed this matter very closely, and I am very relieved on a personal level to have learned this: I can now sleep well at night knowing that neither my children nor myself have been subjected to any health issues from exposure to the soil there, because there are no issues. As a result of the positive report, I urge the DTSC to close public comment on December 8 as scheduled and not extend this or any deadlines. Enough time, energy and money has already been consumed to prove that there is no public safety issue for me, my friends, and our children in our enjoyment of the soccer fields at Ladera Linda. PLEASE close this matter immediately and take no further action that would delay the resumption of normal use of the fields there. It is time to move on and let the kids play soccer!!!

Response: *Comment noted.*

Comment 80 - A. Hutchings

We have been residents in RPV for nearly 30 years and my children have enjoyed many activities on the fields of Ladera Linda. This fiasco of the contaminated dirt needs to be laid to rest. Tests have shown it is clean, and it is time to reopen the site to the public and to AYSO for community enjoyment. A colossal amount of time, energy, and money has been placed into this project and it is time to stop the madness. On all that is good within our city, in taking pride that you will not allow tax payer money to be continually spent on this site unnecessarily, we beseech of you that you close comments on December 8th as schedule and do not extend deadlines. As tax paying residents we would like our voice heard, and want nothing more than the children of our beautiful city to play soccer, or whatever they choose on the Ladera site. Every day it is closed you are robbing them of a childhood memory.

Response: *Comment noted.*

Comment 81 - Mary Turbide

We love PV AYSO!

Could you please not waste any more time. Please make a decision without further delay.

Saddened by the waste of time.

Response: *Comment noted.*

Comment 82 – Suzanne Maurizio

I am an AYSO parent and volunteer. I am also a RPV resident with 4 kids at 4 PV schools. It's a shame we're not using the fields at Ladera Linda and it's a shame money from my kids school is being wasted. I grew up playing soccer here, and some of my best memories were made here. It's a shame so much of my tax payer dollars are being wasted on this ridiculous claim. There is NO RISK to anybody using this field. This is a proven fact. As a resident of RPV and an active AYSO participant, I want this matter closed immediately and I want to see those fields being used once again for soccer.

Response: *Comment noted.*

Comment 83 – Angela Casey

I am a supporter of Palos Verdes AYSO/resident of Rancho Palos Verdes. The Ladera Linda site has been thoroughly investigated and assessed and it has been determined that the site poses no risk whatsoever to human health and the environment. I request that the DTSC close public comment on December 8 as scheduled and not extend this or any deadlines. I would like the matter closed immediately with no further action. It is time to move on and let the kids play soccer.

Response: *Comment noted.*

Comment 84 - Bob Merchant

I am a supporter of PV AYSO and would like to see an end to the witch hunt which has been plaguing AYSO and PVPUSD. I am aghast that one peace officer has the power to shut down a city owned property and force a school board to spend hundreds of thousands of dollars to fence off clean dirt.

The community should be ashamed to be falsely led down a path, without facts. Please end this and let the kids play in the best soccer fields in America.

Response: *Comment noted.*

Comment 85 - Ninon Pope

I am a supporter of Palos Verdes AYSO/resident of Rancho Palos Verdes. The Ladera Linda site has been thoroughly investigated and assessed and it has been determined that the site poses no risk whatsoever to human health and the environment. I request

that the DTSC close public comment on December 8 as scheduled and not extend this or any deadlines. I would like the matter closed immediately with no further action. It is time to move on and let the kids play soccer.

Response: *Comment noted.*

Comment 86 – Tarrah Kaulahao

I believe this issue really has gone on long enough. There was never an issue with the dirt, just dumb/crazy neighbors. It's time to stop wasting our tax payers money and let the kids play soccer already. I would have rather paid for two more teachers in our school then the \$150K+ to fence off perfectly fine dirt. What a waste. It's time to move on! Please do not extend the time frame to let these crazy people continue to jabber on and on about nothing.

Response: *Comment noted.*

Comment 87 - Mark Pope

I am a supporter of Palos Verdes AYSO and a resident of Rancho PV.

I've spent many weekends at Ladera Linda. The park brings great joy to many kids of all ages, and their families.

The Ladera Linda site has been investigated and assessed and poses no risk whatsoever. Please can the DTSC close public comment on 12/8 and not further extend any deadlines. I would like the matter closed immediately with no further action.

Let's get back to the kids playing soccer.

Response: *Comment noted.*

Comment 88 – Carlo Maurizio

I support Palos Verdes AYSO and I'm a resident of Rancho Palos Verdes. The Ladera Linda site has been assessed and it has been determined to poses no human health and the environment risk. I'm asking that the DTSC on December 8 close public comment as scheduled and not extend this or any deadlines. It's time to allow the residents of Palos Verdes and the kids access to enjoy this beautiful site and play soccer. This matter needs to be closed immediately with no further action.

Response: *Comment noted.*

Comment 89 – Joseph Thomas

I am a resident of RPV, parent and supporter of the Palos Verdes AYSO. The loss of Ladera Linda for full use by the community and the AYSO has been unfortunate, distracting and wasteful.

As you are well-aware, the Ladera Linda site has been thoroughly investigated and it has been determined that there is no risk to health or our local environment. I do not report this fact lightly as it is my and my neighbors' children whose use of Ladera Linda is in question. Now is time to put this unfortunate and unproductive episode to an end. I request that the DTSC close public comment on December 8 as scheduled and not extend this or any deadlines. I would like the matter closed immediately with no further action. It is time to move on.

Response: *Comment noted.*

Comment 90 - Jennifer Witkowski

I support the AYSO and feel due diligence has been done with the soil samples on the Ladera Linda field.

I feel you should close the case of public comment and NOT extend the deadline past December 8, 2017.

Too much time, energy, test and research has gone into this matter already.

Please close the case and let us use the field.

Response: *Comment noted.*

Comment 91 - Thu Le

I am a Mother of three children, a fervent supporter of Palos Verdes AYSO, a long time resident of Palos Verdes Estate, and tax payer. All three of my children grew up on the Ladera Linda Soccer Field. Two of my children have graduated from University, went on to Medical School, and are now doing their Residency at Stanford. My youngest daughter just got accepted into Irvine Medical School. I am happy to report that all three of my children are healthy, happy, and accomplished adults. My children and I are appalled to learn that there are people who are making unsupported claims, preventing young children from using this lovely site to play Soccer. We looked into these claims and find them to be unsubstantiated. If anything, the Ladera Linda site has been thoroughly investigated, assessed, and determined that it poses no risk whatsoever to human health and the environment. I request that the DTSC close public comment on December 8 as scheduled and not extend this or any deadlines. I would like the matter closed immediately with no further action. It is time to move on and let the kids play soccer.

Response: *Comment noted.*

Comment 92 - Dan Wetzel

This has been a complete waste of time and taxpayer money generated by a few citizens who do not want community space to be used for the community as a whole. The only people harmed have been the children of the community. The Ladera Linda site has been thoroughly investigated and assessed and it has been determined that the site poses no risk whatsoever to human health and the environment. I request that the DTSC close public comment on December 8 as scheduled and not extend this or any deadlines. I would like the matter closed immediately with no further action. It is time to move on and let the kids play soccer.

Response: *Comment noted.*

Comment 93 – Charles Channell

I as a supporter of AYSO Region 10 in Palos Verdes and I've been following the Ladera Linda site reports in the news, on-line, and talking with people directly involved. My children have played soccer at the site, I've refereed at the site, and we've hiked in and around the site. Additionally, my father was a bio-environmental engineer with the Air Force and my career has been in aerospace so I do understand the issues. It seems that the latest comprehensive results show there isn't any health risks associated with the site. Given these results, given the time and funds invested, etc., it is time to close out the public comments per the original deadline and use the land for its intended use.

Response: *Comment noted.*

Comment 94 – Karinn Murdock

I am a supporter of Palos Verdes AYSO. I have been playing AYSO since I was four years old, and have coached a team the last four years. The Ladera Linda site has been thoroughly investigated and assessed with a determination that the site poses no risk whatsoever to human health and the environment. I request that the DTSC close public comment on December 8 as scheduled and not extend this or any deadlines, closing the matter immediately with no further action. It is time to move past this and let the kids play soccer.

Response: *Comment noted.*

Comment 95 - Heather Rowland

I am a supporter of Palos Verdes AYSO/resident of Rancho Palos Verdes. The Ladera Linda site has been thoroughly investigated and assessed and it has been determined that the site poses no risk whatsoever to human health and the environment. I request that the DTSC close public comment on December 8 as scheduled and not extend this or any deadlines. I would like the matter closed immediately with no further action. It is time to move on and let the kids play soccer.

Response: *Comment noted.*

Comment 96 - Alison Hudak

I am a supporter of Palos Verdes AYSO and resident of Rancho Palos Verdes. The Ladera Linda site has been thoroughly investigated and assessed and it has been determined that the site poses no risk whatsoever to human health and the environment. I request that the DTSC close public comment on December 8 as scheduled and not extend this or any deadlines. I would like the matter closed immediately with no further action. It is time to move on and let the kids play soccer.

Response: *Comment noted.*

Comment 97 - David G. Behenna

I am a Palos Verdes AYSO supporter. I'm an AYSO volunteer and father of three AYSO players. My three children enjoyed more than 25 seasons (combined) playing Palos Verdes AYSO soccer, including many matches at the Ladera Linda upper soccer fields.

The Ladera Linda upper soccer fields and the adjacent dirt pile have been thoroughly investigated. I understand that significant funds have been expended on scientific testing. That testing has determined that the site poses NO risk to the players', adult volunteers' and parent/spectators' health, and the environment.

A local Palos Verdes website -- PVP Watch -- has reported that the Palos Verdes Peninsula Unified School District and Palos Verdes AYSO have expended approximately \$1,000,000 in investigating this matter, in defending the kids' rights to use the soccer fields -- a precious resource in the park-starved Palos Verdes Peninsula -- and for other expenses. That is money that would have been better spent on educational programs and for AYSO's 100% volunteer-based youth soccer program.

I request that the Department of Toxic Substances Control close public comment on December 8, 2017, as scheduled, and not extend any deadlines.

It is time to move on. Let the kids play soccer at the Ladera Linda upper fields!

Response: *Comment noted.*

Comment 98 – Heather Haddon Matson

Based on the below information from DTSC I am sending my request to close this investigation once and for all time. Both the PVPUSD and AYSO have spent significant amounts of money during the investigation which has taken necessary monies from their respective organizations over a big nothing. Please do not prolong this any longer.

- The PEA concludes that there is no significant risk to human health or the environment.
- No asbestos containing material was found that poses a risk to human health.
- DTSC evaluated all chemicals of concern detected at the site, including asbestos.
- DTSC has reviewed all site investigation documents prepared prior to, and including the PEA

Response: *Comment noted.*

Comment 99 – Selina Lai

I am writing to share my belief that the investigation of the Ladera Linda site has adequately shown that the initial concerns brought forth by “concerned” community members were unfounded and have led to the egregious use of public funds. Our Palos Verdes Unified School District and our local American Youth Soccer Organization, Region 10 have spent MILLIONS of dollars on soil testing and lawyers to address the complaints of residents in this area. There is no reason to extend the public comment period beyond the required 30 days because:

- 1) The Preliminary Endangerment Assessment (PEA) concluded that there is no significant risk to human health or the environment.
- 2) No asbestos containing material was found that poses a risk to human health.
- 3) The DTSC has not received any comments, submittals or correspondence to date, with new factual information that would change the conclusions proposed for adoption by the DTSC in the PEA.

It is time to stop the restricted use of this property as there is no evidence of risk to human health or the environment. It is time that our kids get to play soccer at Ladera Linda once again.

Response: *Comment noted.*

Comment 100 – Janet Louie

I am a supporter of Palos Verdes AYSO and am a resident of Rancho Palos Verdes. The Ladera Linda site has been thoroughly investigated and assessed and it has been determined that the site poses no risk whatsoever to human health and the environment. I request that the DTSC close public comment on December 8 as scheduled and not extend this or any deadlines. I would like the matter closed immediately with no further action. It is time to move on and let the kids play soccer.

Response: *Comment noted.*

Comment101 – Roger Lin

Thank you for you and the DTSC's diligence in handling the Ladera Linda case.

With the report concluding that there is no negative impact, please close the matter and determine that no further action is required for the Ladera Linda site, that PV AYSO has satisfied its obligations under the Consent Agreement, and that the Post and Fence Order be rescinded.

Response: *Comment noted.*

Comment 102 – Brian Campbell

Below is a copy of the email I sent Mr. Garcia Monday thanking him and your team for wrapping up this issue in our city. Please stand firm on that decision. Please do not be overly influenced by a half dozen or so individuals whose goal is to prevent, apparently at any cost, kids and their families from using these fields.

"I was in the process, as an individual member of the city council who currently serves as the Mayor, of writing you a personal email asking you to NOT extend. However, you had already made that decision. Thank You.

Thanks for all of you and your teams' hard work and finally putting an end to this issue. I can assure you that from the interaction I have with residents, the vast majority of the community is ready to move forward with their lives and put this behind them."

Response: *Comment noted.*

Comment 103 – Angela Sandora-Hoover

I am a resident of Palos Verdes and a supporter of Palos Verdes AYSO. The Ladera Linda site has been thoroughly examined & measured and has been determined to pose no risk of any kind to the human health and/or the environment. I am fully comfortable with the results and eager to allow my child to resume playing on these fields. I request that the DTSC close public comment on December 8 as scheduled and not extend this or any deadlines. I would like the matter closed immediately with no further action. It is time to move on and let the kids play soccer.

Response: *Comment noted.*

Comment 104 - Cheryl Dawson

I am writing to share my belief that the investigation of the Ladera Linda site has adequately shown that the initial concerns brought forth by "concerned" community members were unfounded and have led to the egregious use of public funds. Our Palos Verdes Unified School District and our local American Youth Soccer Organization, Region 10 have spent MILLIONS of dollars on soil testing and lawyers to

address the complaints of residents in this area. There is no reason to extend the public comment period beyond the required 30 days because:

- 1) The Preliminary Endangerment Assessment (PEA) concluded that there is no significant risk to human health or the environment.
- 2) No asbestos containing material was found that poses a risk to human health.
- 3) The DTSC has not received any comments, submittals or correspondence to date, with new factual information that would change the conclusions proposed for adoption by the DTSC in the PEA.

It is time to stop the restricted use of this property as there is no evidence of risk to human health or the environment. It is time that our kids get to play soccer at Ladera Linda once again.

Response: *Comment noted.*

Comment 105 - Linda Reid

I am in full support of re-opening the fields without delay, and without giving in to the community "activists" who continue to proceed without facts or cause.

Consider:

DTSC evaluated all chemicals of concern detected at the site, including asbestos. DTSC has reviewed all site investigation documents prepared prior to, and including the PEA.

DTSC has not received any comments, submittals or correspondence to date with new factual information that would change the conclusions proposed for adoption by DTSC in the PEA.

Although there was no regulatory requirement to release the PEA for public review and provide a 30-day review period. DTSC decided to release the draft PEA and provide a 30-day review period due to the concerns expressed by community members. This is beyond enough time. Please consider that in today's unique political climate, people who yell the loudest are empowered to keep doing so, whether what they say is true or not. This case is one of those: the loudest voice is not the voice of fact or reason, but rather the voice of hatred, misinformation, and ill-founded conspiracy theories.

As a school board member, I care most about our children. Part of that care has to do with the incredible amount of money we have had to spend to deal with this case. Please don't force us to incur additional costs for no reason.

Response: *Comment noted.*

Comment 106 - Betty Lin Peterson

Thank you for overseeing the investigations of the Ladera Linda Soils. I find the results comforting and am requesting you to help end the investigation that has cost our

already financially thinly-stretched school district half a million dollars. I have 2 children going to Montemalaga Elementary School, where some have claimed that contaminated soil from Ladera Linda was used to fill gopher holes in the field. My kids also played soccer, at Ladera Linda, with their AYSO team. As a parent and a Council Member who has vested interest in the health and safety of our children and community, I am satisfied with the findings and implore you and your team to stop this financial bleed of both PVPUSD and AYSO. Enough is enough.

Response: *Comment noted.*

Comment 107 – Debbie Ma

I am writing to express my opposition of an extension to the 30 day Public Comment period regarding the Ladera Linda site.

PVUSD and AYSO were cleared of any wrongdoing and every single soil sample tested came back completely clean. \$1M has been spent to defend this inquiry. This case has been reviewed by DTSC and there is NO REASON to keep this inquiry open.

Please note the following facts that support DTSC's decision:

- The PEA concludes that there is no significant risk to human health or the environment.
- No asbestos containing material was found that poses a risk to human health.
- DTSC evaluated all chemicals of concern detected at the site, including asbestos.
- DTSC has reviewed all site investigation documents prepared prior to, and including the PEA.
- DTSC has not received any comments, submittals or correspondence to date, with new factual information that would change the conclusions proposed for adoption by DTSC in the PEA.
- DTSC is continuing to hold a full 30-day comment period, and will continue to evaluate comments as they are received.
- DTSC cannot unduly restrict the rights of the owners/users of the Ladera Linda Site without evidence of risk to human health or the environment.
- Although there was no regulatory requirement to release the PEA for public review and provide a 30-day review period; DTSC decided to release the draft PEA and provide a 30-day review period due to the concerns expressed by community members.
- A 30-day comment period is the same length of time provided for public review of other decision documents that have a regulatory requirement for public review, such as Remedial Action Plans, Removal Action Workplans, or Negative Declarations where no significant impacts are found.

Please consider closing this case and deny the extension

Response: *Comment noted.*

Comment 108 - Joseph P. Tabrisky

I am writing both as a long-time resident of the City of Rancho Palos Verdes (approximately 38 years) and as a long time volunteer of the American Youth Soccer Organization. As a child, I played on the original fields where the lower Ladera Linda fields are now located. I was a volunteer when the upper Ladera Linda fields were first constructed by AYSO under an agreement with the Palos Verdes Unified School District.

To say that I am disappointed that the DTSC is continuing to keep open a non-regulatory public comment period regarding a PEA which has confirmed what AYSO and PVPUSD has been representing for close to 2 years would be an understatement. As your December 11, 2017 email indicates, generally, for a PEA determination, there is no regulation mandating any public-review period. Despite those facts, after a lengthy process, the DTSC already has engaged in a 30 day period, a community meeting and now is extending this matter even further. Why? How is all of this delay changing the PEA or the science? How is continuing to extend this period really a help to the community? To be perfectly frank, it only is helping a small group of people who have been engaged in one or another war with PVPUSD or AYSO and have used our governmental agencies as tools to frustrate their work with our youth.

Back in 2016, our then State Senator, David Hadley, asked that the DTSC work as efficiently and as expeditiously as possible to determine if the dirt posed a hazard to human life or the community. Her correctly surmised that the delay in resolving this matter, one way or the other, would only serve to harm our community by keeping open a sore that needed to be healed. I was very pleased to see that the DTSC took up the mantel and tried to work through the process. However, after the election, it appears that the DTSC once again is falling back to delay this matter at great expense to our youth and school district.

The DTSC received the results of the testing on June 1, 2017 and indicated on its system that it would issue the final PEA within 45 days of that date. Not only did the DTSC not make the 45 day deadline which it stated to the public, but it didn't issue any order for removal of the fencing until December 8, 2017. I understand that the DTSC's delay cost AYSO and PVPUSD tens of thousands of dollars.

That the DTSC wants to continue to keep this matter open simply defies logic. More importantly, it simply is being used by a small minority of individuals who care little for our youth but wish to use the DTSC as a tool to attack the PVPUSD and AYSO.

Please just do what's right and close this matter. Nothing is being gained by any further delay.

Response: *Comment noted.*



Matthew Rodriguez
Secretary for
Environmental Protection



Department of Toxic Substances Control

Barbara A. Lee, Director
5796 Corporate Avenue
Cypress, California 90630



Edmund G. Brown Jr.
Governor

ERRATA SHEET
FOR
PRELIMINARY ENDANGERMENT REPORT
DATED NOVEMBER 3, 2017
LADERA LINDA SITE
32201 FORRESTAL DRIVE
RANCHO PALOS VERDES CALIFORNIA 90270

CORRECTIONS
(January 19, 2018)

1. Page ES-2, First Complete Paragraph, First Sentence is revised as follows: "A series of investigations by PVPUSD and PV AYSO showed that the Torrance soil ~~did not contain~~ed organic contaminants at ~~other than negligible~~ concentrations **below human health screening levels** and that metals concentrations were within accepted background ranges."
2. Page 19, Section 4.1.1., Paragraph 3, Second Sentence is revised as follows: "The ~~roofing debris with mastic~~ **yellow sheet vinyl** was considered ~~potentially~~ friable, whereas the asbestos in the other two positive samples was considered nonfriable."
3. Page 46, Section 10.1 Second Bullet, Third Sentence is revised as follows: "Of these 24 pieces of C&D debris, 3 contained asbestos, with 1 of the 3 asbestos-containing pieces determined to be ~~potentially~~ friable and the other 2 determined to be nonfriable."