

Athens' Crown Recycling Services MRF Project

State Clearinghouse: 200741015

Project Location: 9143 to 9189 DeGarmo Avenue and 11300 West Pendleton Street, Sun Valley, California, 91352

Community Plan Area: Sun Valley—La Tuna Canyon

Council District: 6—Imelda Padilla

Project Description: This document serves as an Addendum to the Arakelian Enterprises Inc., dba Crown Recycling Services/Athens Services, a Solid Waste, Recycling and Resource Recovery Operation Project Environmental Impact Report (EIR) (SCH No.2007041015), certified by the City of Los Angeles (City) on August 28, 2014(the "Certified EIR"). The Certified EIR analyzed the issuance of a Solid Waste Facility Permit to accept up to 2,000 tons per day (TPD) of construction material, up to 1,500 TPD of source-separated green waste, up to 500 TPD of source-separated supermarket trim and cull, up to 200 TPD of source wood waste, and up to 2,500 TPD of municipal solid waste (MSW) for a total of 6,700 TPD and construction of a 107,000 square foot enclosure for back yard operations, utilization of a negative draft system for odor cleansing and a new 25-foot high metal panel wall along the southern and northern Project Site boundaries. A revised Final EIR analyzed same operations and permitted tonnage delineated by the same material types with an enclosure over the entire back yard (196,075 square feet) and a 64,120-square foot enclosure over the front yard tipping floor and transfer areas. The Project Applicant, Arkaelian Enterprises, Inc., seeks to update the current Solid Waste Facility Permit (No.19-AR-0303) to eliminate the tonnage by material type pursuant to Condition 17.g. of the Permit while continue daily tonnage limit to 6,700 tons. Further, the Applicant requests to eliminate Condition 17.h. of the Permit that limited the daily tonnage to 4,600 tons per day (including delineation by material type) prior to the construction of the enclosures of the facility as it no longer is applicable.

This Addendum analyzes the potential impacts of updating the Crown Recycling Services/Athens Services Solid Waste Facility Permit to limit the maximum daily tonnage to 6,700 tons with no delineation by material type.

PREPARED FOR:
Los Angeles Dept.
of Building and Safety, Local Enforcement Agency

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APPLICANT:

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1 INTRODUCTION

This document is an Addendum to the Environmental Impact Report (EIR) prepared for the Arakelian Enterprises Inc. (dba Crown Recycling Services/Athens Services, a Solid Waste, Recycling and Resource Recovery Operation Project (State Clearinghouse No. 2007041015), which was certified by the City of Los Angeles (City) on August 28, 2014 (Certified EIR). The Certified EIR constitutes the Draft EIR (prepared, April 2009), Final EIR (prepared October 2012) and Revised Final EIR (prepared July 2014). In accordance with the California Environmental Quality Act (CEQA), this Addendum to the Certified EIR analyzes proposed modifications (the Modified Project) to the Crown Recycling Services/Athens Services Solid Waste, Recycling and Resource Recovery Operation Project approved in August 2014 (the Approved Project) and demonstrates that the Modified Project does not meet the standards for a Supplemental or Subsequent EIR pursuant to Public Resources Code, Section 21166 or CEQA Guidelines Section 15162 and 15163.

1.1 BACKGROUND

Overview of Project Site History

The facility began operations at the Project Site in 1974 as a permitted transfer station under the name of DeGarmo Street Dump. In 1992, the name was changed to Community Recycling & Recovery, Inc., to describe the transfer and recycling operations more closely. From the time of inception, the facility operated as a transfer station, initially recycling materials by hand. In the early 1980s, the pending landfill crisis became apparent, and the facility began mechanizing the recycling of materials from the waste stream. By 1989, the State legislature passed AB 939 requiring 50% of all waste in the State by recycled. Many local agencies responded by placing limits on landfill operations and requirements for source and secondary recycling. The facility then expanded its operations at the Project Site to include a mixed waste processing, recycling for source-separated products that include paper, wood, yard trimmings, and supermarket produce, and a mixed construction and demolition processing. Specifically, the facility added wood waste recycling operations in 1988, construction materials recycling operations in 1991, green waste receiving and processing operations in 1992, and supermarket produce and trim and cull operations in 1995.

As a result of the green waste recycling operations, Community Recycling received odor complaints and Notices of Violation of (South Coast Air Quality Management District) Rule 402 and Health and Safety Code Section 41700 (public nuisance). On June 5, 2003, the SCAQMD Hearing Board entered a Stipulated Order for Abatement and Findings and Decision (Case No. 5390-1) and imposed a number of conditions on the operation of the facility.

In response, Community Recycling had made several operational and procedural changes and improvements per the Stipulated Order. The City of Los Angeles Local Enforcement Agency (LEA) negotiated an Interim Operating Agreement with Community Recycling in 2007. The Interim Operating Agreement allowed the facility to continue to operate within limits until facility improvement were made, including walls, enclosures, and permits. Limits to different material types were put in place to minimize dust and odor impacts on the neighborhood from outdoor waste processing activities, limits to different material types were put in place.

Up until 2014 the site was divided into two operations: front yard and back yard. The front yard

functioned under a Solid Waste Facilities Permit that allowed Community Recycling (prior business name) to operate as a transfer station to receive up to 1,700 tons per (TPD) day of municipal solid waste in which recyclable materials are recovered out of the waste. The back yard operated under an Interim Operating Agreement that allowed Community Recycling to receive up to 2,900 TPD of non-permitted materials as follows: construction & demolition debris (1,200 TPD), green yard waste/tree trimmings (1,200 TPD), trim & cull food materials (350 TPD), and wood materials (150 TPD) for recycling.

The proposed construction of the building enclosure over all waste processing activities is a mitigation measure intended to satisfy the Stipulated Order of Abatement, Interim Operating Agreement, and the City of Los Angeles Hearing Officer Public Hearing Working Group findings in March 2014.

The subject conditional use permit is requested pursuant to LAMC Section 12.24 U.22. (c), which states that a conditional use permit ("CUP") is required for "Recycling Materials Processing Facilities in the M2 and M3 zones when the facility is not in compliance with all of the conditions set forth in Section 12.21 A.18. (f)." LAMC Section 12.21 A.18. f) includes 16 requirements for Recycling Materials Processing Facilities located in the M2 and M3 zones, some of which are not achieved by the Approved Project:

- a) located at least 1,000 feet from any A, R, C, P, PB, MR, or M1 Zone or [LAMC12.21 A.18(f)(1)];
- b) Recyclable Materials collected and processed on the site shall be limited to paper, cardboard, glass, metal, plastic, and other items that are deemed appropriate by the Department of Building and Safety, Bureau of Sanitation, and the Fire Department [LAMC 12.21 A.18. (f)(3)]; and
- c) The facility shall be surrounded by a 6-foot high, concrete block wall and a 5-foot landscape buffer, approved by the City Planning Department, adjoining all street frontages [LAMC 12.21.A.18(f)(14)].

First, a CUP was required because the Project Site is located within 1,000 feet from several M1 zoned properties and one C2 zoned property, as identified on the accompanying 1,000 Ft. Radius Map and, therefore, is not in compliance with LAMC Section 12.21.A.18(f)(1). Second, the applicant collects and processes items that are not specifically listed in LAMC 12.21.A.18(f)(3), but that are otherwise permitted to be processed pursuant to the Interim Operating Agreement and overseers CalRecycle and the Local Enforcement Agency having jurisdiction over the transfer station and recycling operations. Third, for the reasons discussed herein, the facility is unable to provide a 5-foot landscape buffer adjoining all street frontages, in compliance with LAMC Section 12.21 A.18(f)(14). The applicant's existing operations comply with the remaining conditions set forth in LAMC 12.21 A.18 (f).

The facility is desirable to the public convenience or welfare because the project provides a longstanding public service to handle municipal solid waste, green waste, and recycling services generated from the City's residents. It is undisputed that the waste handling and processing services provided by the applicant are in much demand by the City.

In 2014, the facility was granted a CUP and a SWFP that permitted the facility to receive 2,500 TPD of municipal solid waste, 2,000 TPD of construction materials, 1,500 TPD of source-

separated green waste, 500 TPD source-separated supermarket trim and cull and 200 TPD of source separated wood waste – once the building enclosures are completed. The facility was sold to Recology in 2014, and then the project stalled. The facility was acquired in 2017 by Crown Recycling Services LLC, which merged with Arakelian Enterprises Inc., dba Crown Recycling Services/Athens Services in 2020. The new building enclosures were constructed from 2017 thru 2021 by Crown Recycling Services/Athens Services. Presently, the facility continues to be operated by Athens Services under the business name Crown Recycling Services. With the issuance of full solid waste permit for the entire facility and the completion of the enclosed building, the 2007 Interim Operation Agreement is no longer required or in effect. Hereon forward, the Interim Operation Agreement can be used as a guidance document.

Overview of CEQA History

Pursuant to the SCAQMD Stipulated Order for Abatement on odors emanating from organics and food materials, a 107,000-square-foot structure was proposed to enclose most of the back yard operations relating to those materials. Specifically, the structure would enclose the produce trim and cull receiving operations, processed organics stockpile, and the wood receiving, processing and ground material operation. The 107,000-square-foot building enclosure was proposed to utilize a negative draft system to draw air from receiving and processed stockpile areas inside the building. The air would then be treated through an odor cleansings system (wet air scrubber) to remove the odorous compounds before the air is discharged to the atmosphere. The Project included rooftop mechanical equipment and heating, ventilation, and air conditions (HVAC) units and exhaust fans to provide cooling and ventilation within the building. In addition, the Project included two roof canopies, one at the southern corner of the Project Site off Randall Street and a second along the southeastern property line. Finally, the Project proposed replacing the perimeter fence with a new 25-foot-high metal panel wall along the southern and northern boundaries of the Project Site.

The City prepared a Draft EIR pursuant to CEQA Guidelines for the Community Recycling Project (name known at the time the EIR was prepared) to assess potential environmental impacts of the Project. The Draft EIR analyzed the following CEQA environmental topics: Aesthetics, Air Quality, Geology and Soils, Hazards and Hazardous Materials, Land Use and Planning, Noise and Transportation/Traffic. The Draft EIR concluded that, with mitigation, all the Project's environmental impacts would be less than significant.

The Draft EIR was circulated in April 2009 for a 45-day review period. Eighteen comment letters were received on the Draft EIR and a Final EIR addressing the comments was prepared and published October 2012. After an initial public hearing for the proposed project held on March 8, 2013, a Working Group was formed at the request of two City Council District Offices. The Working Group met and agreed on new conditions including the provision of additional enclosures at the Site. An analysis of the additional provisions was prepared as an "Enclosure Alternative" that became the preferred CEQA project alternative.

Under the Enclosure Alternative, the same operations would occur on the Project Site as under the Proposed Project (as analyzed in the Draft EIR), but additional enclosures would be constructed to house these operations. This alternative included the same permitted tonnage as the Proposed Project (6,700 TPD). Specifically, like the Proposed Project, the alternative permitted the Project Site to receive 2,500 TPD of municipal solid waste, 2,000 TPD of construction materials, 1,500 TPD of source-separated green waste, 500 TPD source-separated supermarket trim and cull, and 200 TPD of source-separated wood waste. However, the Proposed

Project only included a 107,000-square-foot enclosure over the existing organics area pursuant to the Stipulated Order of Abatement and Findings. In contrast, the Enclosure Alternative included an enclosure over the entire back yard (196,075 square feet) and a 64,120-square-foot enclosure over the front yard tipping floor and transfer station. A Revised Final EIR was prepared and published in July 2014 with the Enclosure Alternative analysis.

On August 28, 2014, the City certified the EIR and approved the Project under Conditional Use Permit (CUP) CPC-2008-4336-CU-ZV-SPR and in September 2014, the California Department of Resources Recycling and Recovery (CalRecycle) issued Solid Waste Facility Permit (SWFP) No. 19-AR-0303 for operation of the Athens Sun Valley Material Recovery Facility (ASVMRF). Both the CUP and SWFP permitted the Crown Recycling Services/Athens Services facility to operate as a solid waste, recycling, and resource recovery operation with a maximum of 6,700 daily tonnage of materials received within the fully enclosed transfer station buildings. The SWFP limited the facility to the following tonnage by material type (condition 17.g.):

Material Type	Tonnage Limit
Municipal Solid Waste	2,500 tons per day
Construction & Demolition and Inert Debris	2,000 tons per day
Green Material	1,500 tons per day
Trim & Cull Material	500 tons per day
Wood Waste	200 tons per day
TOTAL	6,700 tons per day

The SWFP also limited the facility to the following tonnage by material type (Condition 17. h.) prior to the construction of the transfer station buildings:

Material Type	Tonnage Limit
Municipal Solid Waste	1,700 tons per day
Construction & Demolition and Inert Debris	1,200 tons per day
Green Material	1,200 tons per day
Trim & Cull Material	350 tons per day
Wood Waste	150 tons per day
TOTAL	4,600 tons per day

Crown Recycling Services/Athens Services has requested for the updated SWFP to eliminate the tonnage by material type pursuant to Condition 17.g., while continue daily tonnage limit to 6,700 tons and to eliminate Condition 17.h., as it no longer is applicable. Both the Approved Project (as analyzed in the Certified EIR) and the Modified Project are analyzed in this EIR Addendum as discussed further below.

1.2 CEQA AUTHORITY FOR AN ADDENDUM

CEQA establishes the type of environmental documentation required when changes to a project occur after an EIR is certified. Specifically, Section 15164(a) of the CEQA Guidelines states that:

The lead agency or responsible agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred.

CEQA Guidelines Section 15162 requires the preparation of a Subsequent EIR when an EIR has been certified or a negative declaration has been adopted for a project and one or more of the following circumstances exist:

- (1) Substantial changes are proposed in the project which, will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
- (2) Substantial changes occur with respect to the circumstances under which the project is undertaken, which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
- (3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the negative declaration was adopted, shows any of the following:
 - (A) The project will have one or more significant effects not discussed in the previous EIR or negative declaration;
 - (B) Significant effects previously examined will be substantially more severe than shown in the previous EIR;
 - (C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
 - (D) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

Likewise, California Public Resources Code (PRC) Section 21166 states that unless one or more of the following events occur, no Supplemental or Subsequent EIR shall be required by the lead agency or by any responsible agency:

- (a) Substantial changes are proposed in the project which will require major revisions of the environmental impact report;
- (b) Substantial changes occur with respect to the circumstances under which the project is being undertaken which will require major revisions in the environmental impact report; or
- (c) New information, which was not known and could not have been known at the time the environmental impact report was certified as complete, becomes available.

As demonstrated by the analysis in this document, the Modified Project would not result in any new significant impacts, nor would it substantially increase the severity of previously identified significant impacts. Rather, the impacts associated with the Modified Project are within the envelope of impacts addressed in the Certified EIR and do not constitute a new or substantially increased significant impact. Therefore, the modifications resulting from the Modified Project do not meet the criteria for a Supplemental or Subsequent EIR pursuant to Public Resources Code, Section 21166 and CEQA Guidelines Section 15162 and 15163.

2 PROJECT DESCRIPTION

2.1 PROJECT SUMMARY

Overview of Approved Project

Pursuant to the SCAQMD Stipulated Order for Abatement on odors emanating from organics and food materials, a 107,000-square-foot structure was proposed to enclose most of the back yard operations relating to those materials. Specifically, the structure would enclose the produce trim and cull receiving operations, processed organics stockpile, and the wood receiving, processing and ground material operation. The 107,000-square-foot building enclosure was proposed to utilize a negative draft system to draw air from receiving and processed stockpile areas inside the building. The air would then be treated through an odor cleansings system (wet air scrubber) to remove the odorous compounds before the air is discharged to the atmosphere. The Project included rooftop mechanical equipment and heating, ventilation, and air conditions (HVAC) units and exhaust fans to provide cooling and ventilation within the building. In addition, the Project included two roof canopies, one at the southern corner of the Project Site off Randall Street and a second along the southeastern property line. Finally, the Project proposed replacing the perimeter fence with a new 25-foot-high metal panel wall along the southern and northern boundaries of the Project Site.

After an initial public hearing for the Proposed Project (held on March 8, 2013), a Working Group was formed at the request of two City Council District Offices. The Working Group met and agreed on new conditions including provision of additional enclosures at the Project Site. A revised project, analyzed as the Enclosure Alternative, was provided in a Revised Final EIR. Like the Proposed Project, the alternative (Preferred Project) permitted the project to 6,700 TPD with specific materials by type:

Material Type	Tonnage Limit
Municipal Solid Waste	2,500 tons per day
Municipal & Demolition and Inert Debris	2,000 tons per day
Green Material	1,500 tons per day
Trim & Cull Material	500 tons per day
Wood Waste	200 tons per day
TOTAL	6,700 tons per day

Modifications to Approved Project

Arakelian Enterprises, Inc., dba Crown Recycling Services/Athens Services (the Applicant) proposes to update SWFP No. 19-AR-5581 to update the Solid Waste Facility Permit (SWFP) to eliminate the tonnage by material type pursuant to Condition 17.g., while continue daily tonnage limit to 6,700 tons and to eliminate Condition 17.h., as it no longer is applicable.

The SWFP condition 17.g that limits the daily tonnage at the facility to 6,700 tons includes the delineation of material type which the Applicant requests to be removed. The condition material type reads as follows:

Material Type	Tonnage Limit
Municipal Solid Waste	2,500 tons per day
Municipal & Demolition and Inert Debris	2,000 tons per day
Green Material	1,500 tons per day
Trim & Cull Material	500 tons per day
Wood Waste	200 tons per day
TOTAL	6,700 tons per day

Further, the current Solid Waste Facility Permit, condition 17. h., limits the daily tonnage prior to the construction of the enclosure of the transfer station to 4,600 tons which no longer applicable. The condition limits the tonnage by the following material type:

Material Type	Tonnage Limit
Municipal Solid Waste	1,700 tons per day
Municipal & Demolition and Inert Debris	1,200 tons per day
Green Material	1,200 tons per day
Trim & Cull Material	350 tons per day
Wood Waste	150 tons per day
TOTAL	4,600 tons per day

The Applicant seeks to remove Permit condition 17.g provide a replacement condition of 6,700 tons with no limits on tonnage per material type. Also, the Applicant seeks to remove Permit Condition 17.h as it's no longer applicable. The maximum tonnage was analyzed in the Certified EIR. The only difference is Arakelian Enterprises Inc. is requesting the tonnage no longer be delineated by type. No other changes to the Project are requested.

2.2 ENVIRONMENTAL SETTING

Project Location

The Crown Recycling Services/Athens Services facility 9143 to 9189 DeGarmo Avenue and 11300 West Pendleton Street, in the Sun Valley—La Tuna Canyon Community Plan (Community Plan) Area of the City of Los Angeles. As shown in **Figure 2-1, Project Location**, at the end of **Section 2, Project Description**, the Project Site comprises 12 parcels for assessment purposes, (including 11 parcels totaling 8.03 acres on the southwest side of DeGarmo Avenue between Pendleton Street and Randall Street and a 2.25-acre portion of the 4.25-acre parcel on the northeast. Side of DeGarmo Avenue between Pendleton Street and Randall Street) for a total area of 10.28 acres. Note that the northerly approximately two acres of the 4.26-acre parcel on the northeast side of DeGarmo Avenue was included in the 2014 Conditional Use permit (CUP) issued for the facility, however, these parcels are not included as part of the recycling facility. The total area of the parcels that are included within the existing SWFP equates to 10.28 acres. The designated Los Angeles County Assessor Parcel Numbers (APN) for the 12 parcels are: 2408-034-001, -002, -038, -042, -043, -047 (portion), and 2408-035-031, -034, -036, -037, -038, and -039.

The Project Site is located approximately one-quarter miles northwest of the intersection of Glenoaks Boulevard and Tuxford Street. The main entrance to the facility's office, shop and recycling materials facility is located along DeGarmo Avenue between Randall Street and Pendleton Street. Access to the facility's C&D debris operations is from an entrance at 11217

Randall Street and access to the organic (wood and green waste) operations is through entrances on Pendleton Street.

Existing Conditions

The Project Site has a Light Manufacturing land use designation and is zoned M2-1-G-CUGU (Light Industrial, Height District 1, Surface Mining District, Clean Up Green Up Supplemental Use District) and includes a General Plan Land Use designation of Heavy Manufacturing. The Project Site is developed with uses associated with the solid waste, recycling and resource recovery operation facility that includes an enclosure over the entire back yard (196,075 square feet) and a 64,120-square-foot enclosure over the front yard tipping floor and transfer station area, with business offices. Although the Project Site is located within the Pacoima/Sun Valley Clean Up Green Up (CUGU) Supplemental Use District (Zoning Information File [ZI]-2458), the building's Certificate of Occupancy was issued prior to the date ZI-2458 became effective; therefore, the Modified Project is not subject to the development standards and land use limitation of the CUGU. The Project Site is located within an Environmental Justice Improvement Area (ZI-2355) and, as such, the Modified Project is required to notify the Planning Deputy for Council District 6 of the Modified Project. The Project Site is also located within a State Enterprise Zone (ZI-2374), an Urban Agriculture Incentive Zone, a Very High Fire Hazard Severity Zone, a Methane Buffer Zone, a High Wind Velocity Area, and a Special Grading Area (BOE Basic Grid Map A-13372).

Surrounding Land Uses

The Project Site is in a highly urbanized area comprised of industrial and commercial land uses. Surrounding properties are developed with single- and two-story commercial buildings, industrial buildings, automobile dismantlers, salvage yards, freight yards, solid waste transfer and recycling, large truck parking, and solid waste and inert landfills. The nearest residential use is located approximately 0.3-mile to the southeast.

2.3 REQUESTED PERMITS AND APPROVALS

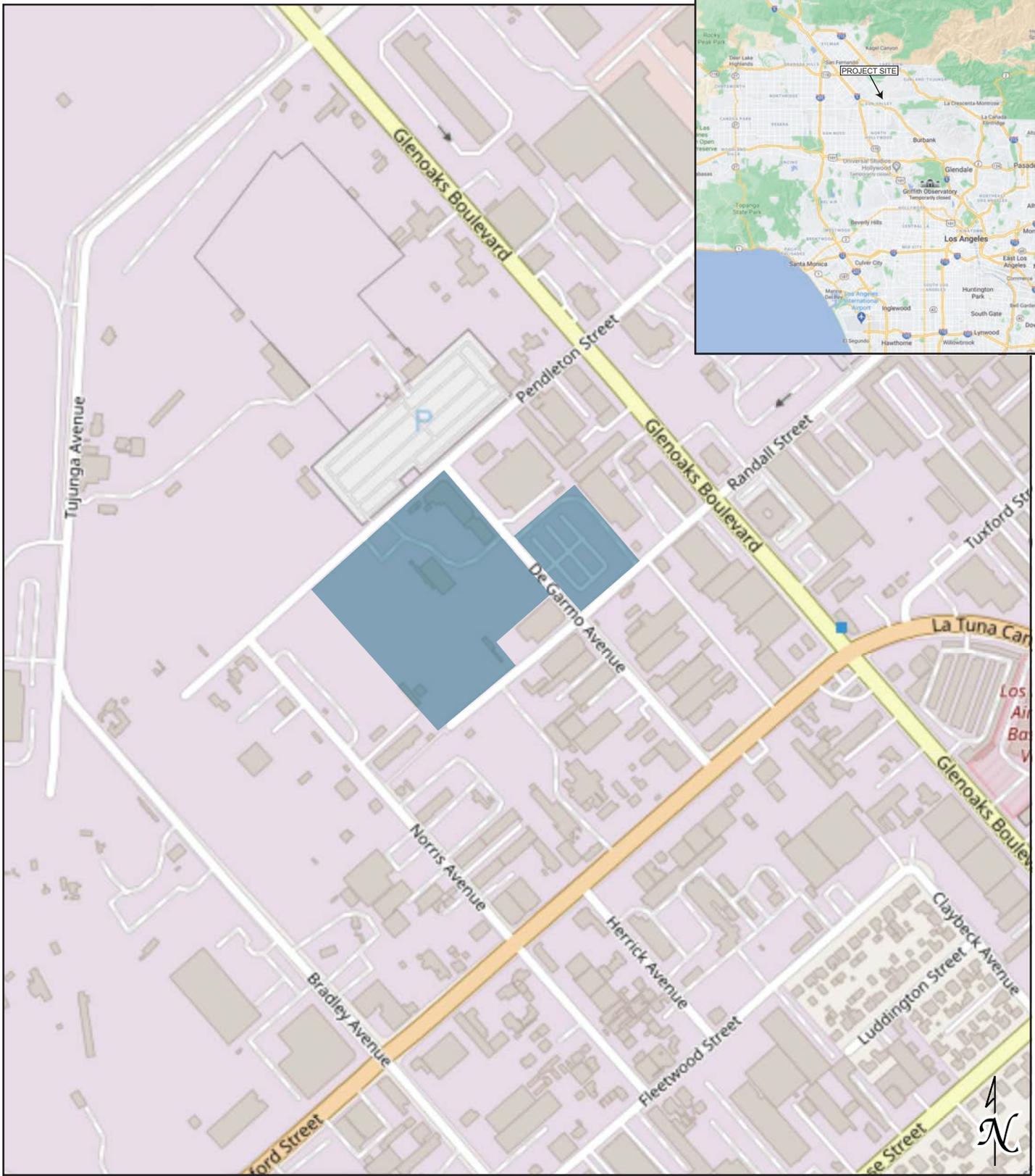
The discretionary entitlements, reviews, permits, and approvals required to implement the Project include, but are not necessarily limited to, the following:

- Pursuant to ZI-2355, application review for an industrial land use project located within an Environmental Justice Improvement Area
- Solid Waste Facility Permit (SWFP), Crown Recycling Services/Athens Services facility operates under the SWFP No. 19-AR-0303, issued by CalRecycle and the City of Los Angeles Building and Safety Department, Environmental Affairs Division, Local Enforcement Agency (LEA).
- Conditional Use Permit (CUP), Crown Recycling Services/Athens Services facility operates in accordance with zoning and land use CUP CPC-2008-4336-CU-ZV-SPR issued by the City of Los Angeles, Department of Planning.
- National Pollution Discharge Elimination System, Athens' facility operates in accordance with its State Water Resources Control Board industrial stormwater permit No. 419I025193 maintaining compliance with the site's Stormwater Pollution Prevention Plan (SWPPP).

2.4 RESPONSIBLE PUBLIC AGENCIES

A Responsible Agency under CEQA is a public agency with some discretionary authority over a project or a portion of it, but which has not been designated the Lead Agency (State CEQA Guidelines Section 15381). The list below identifies whether any responsible agencies have been identified for the Project.

- California Department of Resources Recycling and Recovery (CalRecycle)
- City of Los Angeles, Department of Building and Safety, Environmental Affairs Division, Local Enforcement Agency



■ Project Site

Source: OpenStreetMaps, November 2023.

Figure 2-1
Regional and Project Vicinity Location Map

3 ENVIRONMENTAL IMPACT ANALYSIS

This section provides an impact assessment of the Modified Project. The information below addresses each of the environmental issues that were previously analyzed within the scope of the previously Certified EIR (Draft EIR, Final EIR and Revised Final EIR) with the potential to be impacted by the Approved Project and the most current Appendix G of the CEQA Guidelines. The conclusions of the previously Certified EIR are provided as a reference for each environmental issue area for purpose of describing how the proposed changes would not result in any new significant impacts and would not increase the severity of the significant impacts identified in the EIR.

A Modified Environmental Checklist Form was used to compare the anticipated environmental effects of the Modified Project with those disclosed in the Certified EIR and to review whether any of the conditions set forth in CEQA Guidelines Section 15162 and PRC Section 21166, requiring preparation of a Supplemental or Subsequent EIR, have been triggered.

The checklist and evaluation below provide the following information for each of these environmental impact categories:

1 IMPACT DETERMINATION IN THE ADOPTED EIR

This section lists the impact determination made in the Adopted EIR for each impact category.

2 DO PROPOSED CHANGES INVOLVE NEW SIGNIFICANT IMPACTS OR SUBSTANTIALLY MORE SEVERE IMPACTS?

Pursuant to CEQA Guidelines Section 15162(a)(1), this section indicates whether the Modified Project would result in new significant impacts that have not already been considered and mitigated by the prior environmental review or would result in a substantial increase in the severity of a previously identified impact.

3 ANY NEW CIRCUMSTANCES INVOLVING NEW IMPACTS OR SUBSTANTIALLY MORE SEVERE IMPACTS?

Pursuant to CEQA Guidelines Section 15162(a)(2), this section indicates whether there have been changes to the Project Site or the vicinity (circumstances under which the project is undertaken) which have occurred subsequent to the prior environmental documents, which would result in the Modified Project having new significant environmental impacts that were not considered in the prior environmental documents or that substantially increase the severity of a previously identified impact.

4 ANY NEW INFORMATION REQUIRING NEW ANALYSIS OR VERIFICATION?

Pursuant to CEQA Guidelines Section 15162(a)(3) (A-D), this section indicates whether new information of substantial importance which was not known and could not have been known with the exercise of reasonable diligence at the time the previous environmental documents were certified as complete is available, requiring an update to the analysis of the previous environmental documents to verify that the environmental conclusions and mitigations remain valid. If the new information shows that:

- (A) the project will have one or more significant effects not discussed in the prior environmental documents;
- (B) significant effects previously examined will be substantially more severe than shown in the prior environmental documents;
- (C) mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
- (D) mitigation measures or alternatives which are considerably different from those analyzed in the prior environmental documents would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative;

then the question would be answered “Yes,” requiring the preparation of a Supplemental or Subsequent EIR. However, if the additional analysis completed as part of this environmental review finds that the conclusions of the prior environmental documents remain unchanged and no new significant impacts are identified, or identified environmental impacts are not found to be more severe, or there are no additional mitigation measures or alternatives now available or feasible but declined for adoption by the project proponent, then the question would be answered “No” and no Supplemental or Subsequent EIR is required. New studies completed as part of this environmental review are attached to this Addendum or are on file with the Planning Department.

5 MITIGATION MEASURES ADDRESSING IMPACTS

Pursuant to CEQA Guidelines Section 15162(a)(3), this section indicates whether the prior environmental document provides mitigation measures to address effects in the related impact category. If so, a “Yes” response will be provided. In some cases, the previously adopted mitigation measures have already been implemented or are not applicable to the Modified Project, or a significant impact was not identified, and mitigation was not required. In either instance, a “No” response will be indicated.

6 CONCLUSION

For each environmental topic, a discussion of the conclusion relating to the analysis is provided.

3.1 AESTHETICS

	Impact Determination for Approved Project	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?	Mitigation Measures
Except as provided in Public Resources Code Section 21099, would the project:					
a. Have a substantial adverse effect on a scenic vista?	Less than Significant	No	No	No	No
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	Less than Significant	No	No	No	No
c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	Less than Significant	No	No	No	No
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	Less than Significant with Mitigation	No	No	No	Yes

3.1.1 IMPACT DETERMINATION IN THE CERTIFIED EIR

The Certified EIR found that the Approved Project would not result in significant impacts related to aesthetics. Although the new building enclosure, canopies and fence will represent new permanent and solid structures, views of the Project Site would be limited. Thus, views of dirt, stockpiles of refuse and recyclable materials and equipment will be shielded from view as well as the abate odors emanating from the site. Views of the site would be much cleaner and more orderly. The existing mixed-material perimeter fence will be replaced by a fence made of uniform materials that coordinate and match the new structures on the site. The proposed structures would represent an improvement to the visual character of the Project Site.

Height District 1 does not impose a maximum height limit or required yards/setbacks for land uses within the M3 zone. Existing street trees will remain and be maintained. There are no sensitive receptors within the immediate area of the Project Site. Typically, any motorists would be refuse collection trucks or individuals traveling with refuse or recyclable materials. The Project Site is

not located within an area people travel to without a particular destination. There would be no significant impacts related to blockage of views associated with the Proposed Project.

No substantial increase in on-site lighting is anticipated with implementation of the Modified Project. The facility is equipped with 12-1,000-watt lights strategically located to illuminate the Project Site and are directed in such a way to minimize the impact to adjacent properties. Operations currently occur 24 hours a day, thus the site provides a constant source of lighting in the area. Under the Approved Project, existing resource and recovery operations would continue at the Project Site and there would be no new lighting sources that would adversely affect day or nighttime views in the area.

No additional sources of glare would be introduced with the new structures as they would be constructed out of simple metal siding panels in a color that would not contrast with the existing setting. No impacts due to light and glare would be created by the Approved Project.

3.1.2 DO PROPOSED CHANGES INVOLVE NEW SIGNIFICANT IMPACTS OR SUBSTANTIALLY MORE SEVERE IMPACTS?

a) **Would the project have a substantial adverse effect on a scenic vista?**

The Modified Project seeks to remove Permit condition 17.g provide a replacement condition of 6,700 tons with no limits on tonnage per material type. Also, the Applicant seeks to remove Permit Condition 17.h as it's no longer applicable. The Modified Project does not involve physical changes or improvements to the Approved Project or to existing conditions. In addition, no new scenic vistas have been identified or created in the vicinity since preparation and adoption of the Certified EIR. Accordingly, no changes have been made to the Approved Project or the environment which would have the potential to alter the conclusions of the Certified EIR regarding scenic vistas. Therefore, as with the Approved Project, the Modified Project would not have a substantial adverse effect on a scenic vista and no impacts would occur. No mitigation measures were required regarding scenic vistas in the Certified EIR for the Approved Project and none would be required for the Modified Project. Thus, the Modified Project would not involve substantial changes that would result in new significant impacts or a substantial increase in the severity of significant effects previously identified for the Approved Project in the Certified EIR.

b) **Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?**

Since preparation and adoption of the Certified EIR, there remain no officially designated state scenic highways within the immediate vicinity of the Project Site. The closest scenic highway is Interstate 210 (I-210), which runs northwest to southeast through the City San Fernando to City of Pasadena and is located approximately 3 miles north of the Project Site.¹ Views of the Project Site are interrupted by intervening buildings and terrain and is not easily visible from that scenic highway. Further, the Project Site does not contain any scenic resources and because the Modified Project does not involve any physical changes to the Approved Project or existing condition and would involve the use of the facility on

¹ California Department of Transportation, California State Scenic Highway System Map, <https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aaca>.

the same Project Site as the Approved Project, the Modified Project would also be largely hidden from view by existing views from Interstate 210.

Based on the above, the Modified Project would not have the potential to alter the Certified EIR's conclusions regarding state scenic highways and therefore, the Modified Project would not damage scenic resources within a scenic highway and no impacts would occur. No mitigation measures were required regarding scenic vistas for the Approved Project, and none would be required for the Modified Project. Thus, the Modified Project would not involve substantial changes that would result in new significant impacts or a substantial increase in the severity of significant effects previously identified for the Approved Project.

- c) **Would the project, in non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?**

In 2018, the California Office of Planning and Research (OPR) provided comprehensive updates to the CEQA Guidelines. With this, several text revisions to the Appendix G Thresholds were made. In particular, the Aesthetics subcategory checklist question C was modified, which is discussed herein. The Modified Project is in an urban area and as such, the analysis below focuses on whether the Modified Project would conflict with zoning and regulations that govern scenic quality.

Zoning Consistency

The Los Angeles Municipal Code (LAMC) establishes the zoning for the Project Site as M3-1-CUGU with a General Plan designation of Heavy Manufacturing. The M3 Zone allows for heavy manufacturing and storage of a range of uses including but not limited to automobile dismantling yard, junk yard, scrap, brick tile manufacturing, smoking curing or canning, freight, iron or steel foundry, quarry, or stone mill rock sand gravel. Additionally, the Project Site is designated a Los Angeles State Enterprise Zone, Clean Up Green Up, Local Emergency Temporary Regulations – Time Limits and Parking Relief (LAMC 16.02.1) and Environmental Justice Improvement Area in the City of Los Angeles.

The Modified Project would not involve changing or modify the zoning that governs the Project Site under the Approved Project or existing conditions. The Modified Project seeks to remove Permit condition 17.g provide a replacement condition of 6,700 tons with no limits on tonnage per material type. Therefore, the change does not involve zoning, or the regulations associated with development regulations. Thus, the Modified Project would not conflict with the applicable zoning for the Project Site.

Other Regulations

The Project Site is located within the Sun Valley- La Tuna Canyon Community Plan Area. There are no goals or policies governing specific to scenic quality for industrial areas in the Community Plan Area. There are policies addressing urban design for industrial structures and lighting that include the following:

Structures

1. Designing the site and building(s) to convey visual interest and to be visually compatible with adjacent uses.
2. Treating large expanses of blank walls and tilt-up concrete walls visible from the public right-of-way with contrasting complementary colors, building plane variation, murals, planters and/or other landscape elements to create visual interest.
3. Screening of mechanical and electrical equipment from public view

Lighting

Directing exterior lighting onto the Project Site and locating flood lighting so as not to impact any surrounding residential uses.

The Approved Project involved enclosing the activities of the site from public view. There are no residential uses nearby. The Modified Project seeks to remove Permit condition 17.g provide a replacement condition of 6,700 tons with no limits on tonnage per material type. The Modified Project also seeks to remove Permit condition 17.h as it no longer pertains to the Approved Project. No physical changes are proposed or would occur with implementation and the site would continue to operate with an enclosure of the Project Site uses. Therefore, the change does not involve regulations governing scenic quality. Thus, the Modified Project would not conflict with scenic quality regulations for the Project Site.

Summary

Based on the above, the Modified Project would not conflict with regulations governing the scenic quality of the City and impacts would be less than significant. No mitigation measures were required for scenic character and quality in the Certified EIR for the Approved Project and none would be required for the Modified Project. Thus, the Modified Project would not involve substantial changes that would result in new significant impacts or a substantial increase in the severity of significant effects previously identified for the Approved Project in the Certified EIR.

d) Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

The Project Site is in a well-lit area of the City where there are moderate levels of ambient nighttime lighting, including street lighting, vehicle headlights, and security lighting, and indoor building illumination (light emanating from structures that passes through windows). The Project Site is encompassed by an enclosed structure that has security lighting and a two-level office area with windows.

The Modified Project seeks to remove Permit condition 17.g provide a replacement condition of 6,700 tons with no limits on tonnage per material type. Also, the Applicant seeks to remove Permit Condition 17.h as it's no longer applicable. Therefore, the Modified Project would not create a new source of substantial light or glare. Furthermore, the surrounding vicinity consists of industrial/commercial, and office uses and there are no residential or other sensitive users with

views of the Site. As such, impacts would be less-than-significant, and the Modified Project would not require mitigation to reduce impacts from light and glare.

3.1.3 ANY NEW CIRCUMSTANCES INVOLVING NEW IMPACTS OR SUBSTANTIALLY MORE SEVERE IMPACTS?

Based on the above, there are no new circumstances involving new significant impacts or substantially more severe impacts related to aesthetics than previously analyzed in the Certified EIR.

3.1.4 ANY NEW INFORMATION REQUIRING NEW ANALYSIS OR VERIFICATION?

There is no new information of substantial importance that has become available relative to aesthetics impacts. No substantial changes in the environment related to aesthetics beyond those anticipated as part of the Approved Project have occurred since adoption of the Approved Project and no new conditions have been identified within the vicinity of the Modified Project that would result in new or more severe significant environmental impacts. Finally, as determined above, since the Modified Project would not result in any new or substantially more severe aesthetics impacts, a review of additional feasible mitigation measures is not required.

3.1.5 MITIGATION MEASURES ADDRESSING IMPACTS?

No mitigation measures for aesthetics were identified in the Certified EIR for the Approved Project and none would be required for the Modified Project.

3.2 AIR QUALITY

	Impact Determination for Approved Project	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?	Mitigation Measures
Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:					
a. Conflict with or obstruct implementation of the applicable air quality plan?	Less than Significant	No	No	No	No
b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard? <ul style="list-style-type: none"> Construction 		No	No	No	Yes
	Less than Significant	No	No	No	Yes

	Impact Determination for Approved Project	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?	Mitigation Measures
<ul style="list-style-type: none"> • Operation 	Less than Significant with Mitigation				
c. Expose sensitive receptors to substantial pollutant concentrations?	Less than Significant	No	No	No	No
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?					
<ul style="list-style-type: none"> • Odors 	Less than Significant	No	No	No	No
<ul style="list-style-type: none"> • GHGs 	Less than Significant	No	No	No	No

3.2.1 IMPACT DETERMINATION IN THE CERTIFIED EIR

The Certified EIR found that because the Approved Project did not involve any residential development and would, accordingly, not induce substantial populations growth, implementation of the Approved Project would not jeopardize attainment of air quality standards established in the 2007 AQMP for the Basin.

The Certified EIR included modeling of air quality emissions that would be generated by construction of the Approved Project. Modeling of construction emissions calculated that emissions associated with construction of the Approved Project would not exceed any of the mass daily significance thresholds for any pollutant established by the South Coast Air Quality Management District (SCAQMD). In addition, based on the 2.5-acre area proposed for construction and the location of the nearest sensitive receptor approximately 1,800 feet away, average daily emissions associated with construction of the Approved Project were shown to be below applicable localized significance thresholds for CO, NO_x, PM₁₀, and PM_{2.5} during all phases of construction. As such, the Certified EIR concluded that air quality impacts during construction of the Approved Project would be less than significant. Although not required to reduce a significant impact, mitigation measures C-1 and C-2 were included and required measures to further reduce pollutant emissions and control fugitive dust, respectively, during construction.

The Certified EIR also included modeling of air quality emissions that would be generated by operation of the Approved Project. Sources of operational emissions were identified as stationary area sources (space and water heating devices, diesel-powered equipment, and evaporative losses from a diesel storage tank) and mobile sources (motor vehicles traveling to and from the

site). Modeling calculated that the net increase in emissions generated by operation of the Approved Project would not exceed the daily operational emissions recommended by the SCAQMD. In addition, ozone concentrations that would result from the Approved Project's wet air scrubber were calculated to be below state and federal standards at both the property line and at the nearest sensitive receptor. However, the Certified EIR identified that loading and unloading operations could generate fugitive dust and included mitigation measure C-3 requiring control measures to limit fugitive dust during operation. As such, the Certified EIR concluded that air quality impacts during operation of the Approved Project would be less than significant with mitigation.

A health risk assessment was prepared for the Approved Project and identified that the most concentrated source of long-term emissions associated with the Approved Project would be from trucks entering the site, idling at the unloading areas, and then exiting the site. Based on emission quantification, dispersion modeling, and estimation of long-term exposure levels, the potential chronic (long-term) cancer and non-cancer health impacts to sensitive receptors surrounding the Project Site were determined to be negligible.

The Certified EIR identified that the existing facility has been issued 15 Notices of Violation by SCAQMD over the past 5 years, the majority of which were issued for odor nuisance complaints and that the increased tonnage of waste that would be accepted at the facility under the Approved Project could result in additional odors. Therefore, the Certified EIR included mitigation measure C-4, which required implementation of odor control strategies consistent with those identified by the SCAQMD Rule 401 for mitigating odor emissions from transfer stations and material recovery facilities. In addition, mitigation measure C-5 required implementation of both self-imposed and regulatory performance standards to further mitigate odors and mitigation measure C-6 established the timing and protocol for regular maintenance of the wet air scrubber to ensure its continued operation, which is used to further eliminate odors.² Accordingly, the Certified EIR concluded that impacts related to objectionable odors would be less than significant with mitigation.

The Certified EIR identified that the Approved Project would be consistent with all feasible and applicable strategies to reduce greenhouse gas (GHG) emissions identified in the 2006 Climate Action Team Report. Therefore, the Certified EIR concluded that implementation of the Approved Project would have a less-than-significant impact regarding GHG emissions.

3.2.2 DO PROPOSED CHANGES INVOLVE NEW SIGNIFICANT IMPACTS OR SUBSTANTIALLY MORE SEVERE IMPACTS?

a) **Would the project conflict with or obstruct implementation of the applicable air quality plan?**

As previously detailed, the Certified EIR concluded that the Approved Project would be consistent with the 2007 AQMP. After the publication and certification of the Certified EIR, the SCAQMD prepared and adopted the 2022 AQMP. Therefore, the Modified Project would be required to show consistency with the updated 2022 AQMP. In accordance with

² It should be noted that mitigation measure C-6 was developed in response to comments received during public circulation of the Draft EIR and was included as an addition to the Mitigation Monitoring and Reporting Program in the Final EIR.

the SCAQMD's CEQA Air Quality Handbook, Chapter 12, the following criteria are considered as part of this evaluation:

- Criterion 1: Would the project result in any of the following:
 - an increase in the frequency or severity of existing air quality violations; or
 - cause or contribute to new air quality violations; or
 - delay timely attainment of air quality standards or the interim emission reductions specified in the AQMP.
- Criterion 2: Would the project exceed the assumptions utilized in preparing the AQMP?
 - is the project consistent with the population and employment growth projections upon which AQMP forecasted emission levels are based; or
 - does the project include air quality mitigation measures; or
 - to what extent is project development consistent with the AQMP control measures?

The Modified Project seeks to remove condition 17.g and 17.h from the Site's operational permit and replace them with a condition limiting daily allowable tonnage to 6,700 tons with no limits on tonnage per material type. No construction or other physical changes or improvements to the facility are proposed and no changes to the overall tonnage limit would occur. Furthermore, the Modified Project does not propose any changes that would result in an increase in population. Air quality emissions currently occurring under the existing development would continue in the same amounts and manner under the Modified Project. Therefore, the Modified Project would not conflict with the applicable AQMP, and no impact would occur. No mitigation measures were required regarding conflicts with the AQMP for the Approved Project and none would be required for the Modified Project. Thus, the Modified Project would not involve substantial changes that would result in new significant impacts or a substantial increase in the severity of significant effects previously identified for the Approved Project.

- b) Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?**

Construction

As previously detailed, the Certified EIR concluded that air quality impacts during construction of the Approved Project would be less than significant. The Modified Project seeks to remove condition 17.g and 17.h from the site's operational permit and replace them with a condition limiting daily allowable tonnage to 6,700 tons with no limits on tonnage per material type. No construction or other physical changes or improvements to the facility are proposed. Therefore, the Modified Project would have no potential to increase criteria pollutants within the region because of any construction activity and no impact would occur. Although not required to reduce a significant impact, mitigation measures C-1 and C-2 were required during construction of the Approved Project.

Because the Modified Project would not involve construction activities, these measures would not apply to the Modified Project. Thus, the Modified Project would not involve substantial changes that would result in new significant impacts or a substantial increase in the severity of significant effects previously identified for the Approved Project.

Operation

As previously detailed, the Certified EIR concluded that air quality impacts during operation of the Approved Project would be less than significant with mitigation. Specifically, loading and unloading were identified as potential sources of fugitive dust. The Modified Project seeks to remove condition 17.g and 17.h from the site's operational permit and replace them with a condition limiting daily allowable tonnage to 6,700 tons with no limits on tonnage per material type. No changes to the overall tonnage limit or other existing operations would occur. Therefore, implementation of the Modified Project would not increase criteria pollutants within the region because of operations at the site beyond what was previously identified in the Certified EIR, and no impact would occur. Mitigation measure C-3 required the Approved Project to implement control measures to limit fugitive dust during operation and would continue to be implemented during operation under the Modified Project. Thus, the Modified Project would not involve substantial changes that would result in new significant impacts or a substantial increase in the severity of significant effects previously identified for the Approved Project.

c) Would the project expose sensitive receptors to substantial pollutant concentrations?

As previously detailed, the health risk assessment prepared as part of the Certified EIR determined that the cancer and non-cancer health risks associated with the Approved Project would be negligible. No development has occurred after the preparation and certification of the Certified EIR that placed new sensitive receptors closer to the Project Site than were previously identified. Furthermore, the Modified Project seeks to remove condition 17.g and 17.h from the site's operational permit and replace them with a condition limiting daily allowable tonnage to 6,700 tons with no limits on tonnage per material type. No construction or other physical changes or improvements to the facility are proposed and no changes to the overall tonnage limit would occur. As such, the Modified Project would not have the potential to expose sensitive receptors to pollutant concentrations and cancer and non-cancer health risks would remain negligible; no impact would occur. No mitigation measures were required regarding sensitive receptor exposure to pollutant concentrations for the Approved Project and none would be required for the Modified Project. Thus, the Modified Project would not involve substantial changes that would result in new significant impacts or a substantial increase in the severity of significant effects previously identified for the Approved Project.

d) Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

As previously detailed, the Certified EIR identified potentially significant odor impacts associated with the increased tonnage of waste that would be accepted at the facility under the Approved Project. However, the Modified Project seeks to remove condition 17.g and 17.h from the site's operational permit and replace them with a condition limiting daily allowable tonnage to 6,700 tons with no limits on tonnage per material type. No

construction or other physical changes or improvements to the facility are proposed and no changes to the overall tonnage limit would occur. Although changes in the specific amounts of materials the facility would receive could occur and larger amounts of particularly odor-causing materials could be handled and processed at the site, after the preparation and certification of the Certified EIR, the transfer station buildings have been fully enclosed. The Modified Project would not remove the enclosure or create new areas of open material processing or transfer. In addition, no development has occurred after the preparation and certification of the Certified EIR that placed new sensitive receptors closer to the Project Site than were previously identified. As such, the Modified Project would not have the potential to generate odors that would adversely affect a substantial number of people and impacts would be less than significant. The Certified EIR included mitigation measure C-4, which required implementation of odor control strategies, mitigation measure C-5, which required implementation of both self-imposed and regulatory performance standards to further mitigate odors, and mitigation measure C-6, which established the timing and protocol for regular maintenance of the wet air scrubber, which is used to further eliminate odors. These mitigation measures would continue to be implemented, as applicable, under the Modified Project. Thus, the Modified Project would not involve substantial changes that would result in new significant impacts or a substantial increase in the severity of significant effects previously identified for the Approved Project.

In addition to the above, the Certified EIR identified that the Approved Project would be consistent with all feasible and applicable strategies to reduce GHG emissions outlined in the 2006 Climate Action Team Report and concluded that implementation of the Approved Project would have a less-than-significant impact regarding GHG emissions. After the preparation and certification of the Certified EIR, several updated and new GHG reduction plans, policies, and regulations have been implemented at the state and local level; specifically, Assembly Bill 32's 2022 Climate Change Scoping Plan Update, the Southern California Association of Government's 2020-2045 Regional Transportation Plan / Sustainable Communities Strategy (RTP/SCS), and the City of Los Angeles' Green New Deal. Therefore, the Modified Project is required to evaluate consistency with these plans.

The 2022 Climate Change Scoping Plan Update presents a non-exhaustive list of impactful GHG reduction strategies that can be implemented by local governments within three priority areas: Transportation Electrification; VMT Reduction; and Building Decarbonization. The 2020-2045 RTP/SCS sets forth strategies and policies to decrease per capita VMT through: reduction of vehicle trips and VMT; increased use of alternative fuel vehicles; and improved energy efficiency. Los Angeles' Green New Deal details both short- and long-term goals in various topic areas and provides specific targets related to housing and development and mobility and transit, including the reduction of per capita VMT and increased use of alternative modes of transportation.

Because no construction or changes to the operations currently occurring at the Project Site with regard to equipment usage or number of vehicle trips to the Project Site would occur under the Modified Project, implementation of the Modified Project would not alter the amount of GHG emissions generated at the Project Site beyond what was identified for the Approved Project in the Certified EIR nor would the Modified Project involve or prohibit transportation electrification, per capita VMT, building decarbonization, alternative fuel usage, energy efficiency, or alternative modes of transportation. Therefore,

implementation of the Modified Project would not have the potential to conflict with or interfere with the attainment of GHG reduction goals and no impact would occur. No mitigation measures were required regarding GHG emissions for the Approved Project and none would be required for the Modified Project. Thus, the Modified Project would not involve substantial changes that would result in new significant impacts or a substantial increase in the severity of significant effects previously identified for the Approved Project.

3.2.3 ANY NEW CIRCUMSTANCES INVOLVING NEW IMPACTS OR SUBSTANTIALLY MORE SEVERE IMPACTS?

Based on the above, there are no new circumstances involving new significant impacts or substantially more severe impacts related to air quality than previously analyzed in the Certified EIR.

3.2.4 ANY NEW INFORMATION REQUIRING NEW ANALYSIS OR VERIFICATION?

There is no new information of substantial importance that has become available relative to air quality impacts. No substantial changes in the environment related to air quality beyond those anticipated as part of the Approved Project have occurred since approval of the Approved Project and no new conditions have been identified within the vicinity of the Modified Project that would result in new or more severe significant environmental impacts. Finally, as determined above, since the Modified Project would not result in any new or substantially more severe air quality impacts, a review of additional feasible mitigation measures is not required.

3.2.5 MITIGATION MEASURES ADDRESSING IMPACTS?

The Certified EIR included the following air quality mitigation measures required for the Approved Project:

Construction

The following measures shall be implemented to reduce the potential emissions associated with construction activities to the maximum extent feasible:

- C-1 The project developer shall implement measures to reduce the emissions of pollutants generated by heavy-duty diesel-powered equipment operating at the Project Site throughout the project construction phases. Examples of the types of measures currently required and recommended include the following:
- Keep all construction equipment in proper tune in accordance with manufacturer's specifications.
 - Use late model heavy-duty diesel-powered equipment at the Project Site to the extent that it is readily available in the South Coast Air Basin (meaning that it does not have to be imported from another air basin and that the procurement of the equipment would not cause a delay in construction activities of more than two weeks).
 - Use low-emission diesel fuel for all heavy-duty diesel-powered equipment operating and refueling at the Project Site to the extent that it is readily available and cost effective in the South Coast Air Basin (meaning that it does not have to

be imported from another air basin, that the procurement of the equipment would not cause a delay in construction activities of more than two weeks, that the cost of the equipment use is not more than 20 percent greater than the cost of standard equipment). (This measure does not apply to diesel-powered trucks traveling to and from the site.)

- Utilize alternative fuel construction equipment (e.g., compressed natural gas, liquid petroleum gas, and unleaded gasoline) to the extent that the equipment is readily available and cost effective in the South Coast Air Basin (meaning that it does not have to be imported from another air basin, that the procurement of the equipment would not cause a delay in construction activities of more than two weeks, that the cost of the equipment use is not more than 20 percent greater than the cost of standard equipment).
- Limit truck and equipment idling time to five minutes or less.
- Rely on the electricity infrastructure surrounding the construction sites rather than electrical generators powered by internal combustion engines to the extent feasible.

C-2 The project developer shall implement fugitive dust control measures in accordance with SCAQMD Rule 403. The project developer shall include in construction contracts the control measures required and recommended by the SCAQMD at the time of development. Examples of the types of measures currently required and recommended include the following:

- Use watering to control dust generation during demolition of structures or break-up of pavement, and on an as-needed basis.
- Water active grading/excavation sites and unpaved surfaces at least three times daily, or on an as-needed basis.
- Cover stockpiles with tarps or apply non-toxic chemical soil binders.
- Limit vehicle speed on unpaved roads to 15 miles per hour.
- Sweep daily (with water sweepers) all paved construction parking areas and staging areas, and on an as-needed basis.
- Provide daily clean-up of mud and dirt carried onto paved streets from the site, and on an as-needed basis.
- Install wheel washers for all exiting trucks or wash off the tires or tracks of all trucks and equipment leaving the site.
- Suspend excavation and grading activity when winds (instantaneous gusts) exceed 15 miles per hour over a 30-minute period or more, or when dust becomes a visible problem.
- An information sign shall be posted at the entrance to each construction site that identifies the permitted construction hours and provides a telephone number (for both the SCAQMD and LEA) to call and receive information about the construction

project or to report complaints regarding excessive fugitive dust generation. Any reasonable complaints shall be rectified within 24 hours of their receipt.

Operation

C-3 The Project operator shall implement fugitive dust control measures during project operations including the following control measures:

- All incoming and unloading operations will be watered to suppress the rise of dust particles;
- All CR&RR trucks will be washed on-site prior to exiting to reduce the potential for transport of dust and foreign objects onto surrounding streets and neighborhoods, and on an as-needed basis;
- Facilities will be swept at least once per hour and streets at least twice per day;
- A light coat of water will be sprayed over the facility grounds every two to four hours, and on an as-needed basis;
- A misting system will be installed along the perimeter of the fence to assist in suppressing airborne transport of dust.
- Misting nozzles will be placed over unloading and load-out areas to prevent migration of dust.

C-4 The Project operator shall implement odor control measures in accordance with SCAQMD Rule 410:

- A new roof structure will be constructed over the incoming mixed construction materials tipping floor. The roof will be attached to the new fence on two sides and will extend out over the incoming stockpile. This roof structure will also cover the in-feed conveyor system. Misting nozzles will be placed over the unloading and load-out area and where needed.
- A new roof structure will be constructed over the incoming waste tipping floor. The new roof will be attached to the new fence to the south side of the tipping floor and will also have a new wall constructed along the north side of the tipping floor. Misting nozzles will be placed over the load-out area and unloading area.
- A large building will be constructed over the produce trim and cull receiving area, the processed organics stockpile, and the wood waste receiving, processing and ground material stockpile. The building will utilize a negative draft system that will draw air from the receiving and processed stockpile area inside the building. The air will be treated through an odor cleansing system (scrubber) to remove odorous compounds before the air is discharged into the atmosphere.

C-5 The Project operator shall implement a number of both self-imposed and regulatory performance standards in its daily operations to help mitigate odor impacts. Examples of the types of measures include the following:

- Supermarket trim and cull material is processed within twenty-four hours of receipt, and the processed material transported to a composting facility in an adjacent county.
- Only fresh-cut green waste is accepted, and any green waste that is noticed to have a strong odor upon entry to the site is rejected.
- Daily logs of green waste receiving and shipping are maintained as proof of operator's efforts to control waste.
- Every two to four hours, and on an as-needed basis, the facility grounds are sprayed with a light coat of water to help manage odor.
- A misting system is installed and operated along the perimeter fence to assist in suppressing airborne transport of odor.

C-6 The project applicant shall do the following with respect to the wet scrubber:

- Once per shift an operator shall inspect and record all process instrumentation, sensors, drives, and electrical drive data in a daily log for comparison. The responsible supervisor shall be informed of any process values above or below operational range, appropriate analysis and possible repair or change out affected, and actions recorded and reported.
- Spare parts inventory is to be included in the record once per week. The applicant shall keep appropriate spare parts for the wet scrubber on hand at all times. These spare parts shall include fans, pumps, sensors, and an ozone generator.

Mitigation measures C-1 and C-2 were applicable to construction activities. Because no construction or other physical changes to the existing Project Site development or environment are proposed, mitigation measures C-1 and C-2 would not be applicable to the Modified Project.

Although not required to reduce a significant impact of the Modified Project, mitigation measures C-3 through C-6 would continue to be implemented at the Project Site under the Modified Project.

3.3 GEOLOGY AND SOILS

	Impact Determination for Approved Project	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?	Mitigation Measures
Would the project:					
a. Directly or indirectly cause substantial adverse effects, including the risk of loss, injury, or death involving:					

	Impact Determination for Approved Project	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?	Mitigation Measures
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	Less than Significant	No	No	No	No
ii. Strong seismic ground shaking?	Less than Significant	No	No	No	No
iii. Seismic-related ground failure, including liquefaction?	Less than Significant	No	No	No	No
iv. Landslides?	Less than Significant	No	No	No	No
b. Result in substantial soil erosion or the loss of topsoil?	Less than Significant	No	No	No	No
c. Be located on a geologic unit that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	Less than Significant	No	No	No	Yes
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	Less than Significant	No	No	No	No
e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	No Impact	No	No	No	No
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	No Impact	No	No	No	No

3.3.1 IMPACT DETERMINATION IN THE CERTIFIED EIR

The Certified EIR identified that the Project Site is not located within an Alquist-Priolo Earthquake Fault Zone and no known active faults are mapped as crossing the Project Site or projecting

toward the Project Site. Therefore, the Certified EIR concluded that ground rupture due to faulting would not be a significant hazard for the Approved Project.

The Certified EIR found that the Approved Project would be designed and constructed consistent with all applicable provisions of the City of Los Angeles Building Code, which includes regulations and requirements designed to reduce risks to life and property to the maximum extent feasible, and with the seismic design criteria contained within the Uniform Building Code. As such, the Certified EIR concluded that risks from seismic ground shaking would be less than significant for the Approved Project.

The Certified EIR found that the Project Site is not located within a liquefaction hazard zone and site-specific investigation of the subsurface materials conducted at the Project Site did not identify conditions that would contribute to liquefaction. Therefore, it was concluded that risks from liquefaction would be less than significant for the Approved Project.

The Certified EIR identified that the Project Site is relatively flat and not located near any foothills or mountains. As such, it was determined that the possibility of landslides would be minimal, and impacts would be less than significant.

The Certified EIR explained that erosion controls would be implemented during construction and that the potential for erosion during operation would be low due to the flat nature of the project area and developed nature of the Project Site. Furthermore, all grading activities would be conducted under a required grading permit, which includes requirements and standards to limit erosion, and would conform to the requirements of the City of Los Angeles Grading Division and applicable provisions of Chapter IX, Division 70 of the Los Angeles Municipal Code addressing grading, excavations, and fills. Accordingly, the Certified EIR concluded that erosion impacts would be less than significant for the Approved Project.

The Certified EIR stated that field observations and laboratory testing and analysis conducted as part of the Approved Project's Geotechnical Report concluded that both the compacted fill and alluvium beneath the Project Site possess sufficient strength to support the Approved Project's proposed structure. Although impacts related to soil stability were identified as less than significant, mitigation measures D-1 through D-8 were included and required implementation of all recommendations contained within the Approved Project's Geotechnical Report for site preparation, structural design, and construction review.

The Certified EIR stated that expansive soils were not found beneath the Project Site and the Approved Project would be subject to the Los Angeles Building Code, Chapter IX. Therefore, it was concluded that impacts from expansive soil would be less than significant.

The Initial Study prepared as part of preparation of the Certified EIR found that the Project Site is in a developed area of the City of Los Angeles that is served by existing wastewater collection, conveyance, and treatment systems and, therefore, the Approved Project would not require septic or other alternative wastewater systems and no impact would occur.

The Initial Study prepared as part of preparation of the Certified EIR identified that the Project Site is already developed, and the Approved Project would not involve major excavation. Therefore, it was concluded that the Approved Project would have no impact on paleontological resources.

3.3.2 DO PROPOSED CHANGES INVOLVE NEW SIGNIFICANT IMPACTS OR SUBSTANTIALLY MORE SEVERE IMPACTS?

a) **Would the project directly or indirectly cause substantial adverse effects, including the risk of loss, injury, or death involving:**

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

The Certified EIR identified that the Project Site is not located within an Alquist-Priolo Earthquake Fault Zone and no new fault zones have been identified after preparation and certification of the Certified EIR.³ Furthermore, the Modified Project seeks to remove condition 17.g and 17.h from the site's operational permit and replace them with a condition limiting daily allowable tonnage to 6,700 tons with no limits on tonnage per material type. No construction or other physical changes or improvements to the facility are proposed. Therefore, the Modified Project would not have the potential to cause substantial adverse effects involving rupture of a known earthquake fault and no impact would occur. No mitigation measures were required with regard to fault rupture for the Approved Project and none would be required for the Modified Project. Thus, the Modified Project would not involve substantial changes that would result in new significant impacts or a substantial increase in the severity of significant effects previously identified for the Approved Project.

ii) **Strong seismic ground shaking?**

As previously discussed, no construction or other physical changes or improvements to the facility are proposed under the Modified Project. Therefore, the Modified Project would not have the potential to cause substantial adverse effects involving strong seismic ground shaking and no impact would occur. No mitigation measures were required regarding seismic ground shaking for the Approved Project, and none would be required for the Modified Project. Thus, the Modified Project would not involve substantial changes that would result in new significant impacts or a substantial increase in the severity of significant effects previously identified for the Approved Project.

iii) **Seismic-related ground failure, including liquefaction?**

The Certified EIR identified that the Project Site is not located within a liquefaction hazard zone and no new liquefaction hazard zones have been identified on or near the Project Site after preparation and certification of the Certified EIR.⁴ Furthermore, no construction or other physical changes or improvements to the facility are proposed under the Modified Project. Therefore, the Modified Project would not have the potential to cause substantial adverse effects involving

³ California Department of Conservation, California Geological Survey, EQ Zapp: California Earthquake Hazards Zone Application Interactive Map, <https://maps.conservation.ca.gov/cgs/EQZApp/app/>.

⁴ California Department of Conservation, California Geological Survey, EQ Zapp: California Earthquake Hazards Zone Application Interactive Map, <https://maps.conservation.ca.gov/cgs/EQZApp/app/>.

liquefaction and no impact would occur. No mitigation measures were required regarding liquefaction for the Approved Project, and none would be required for the Modified Project. Thus, the Modified Project would not involve substantial changes that would result in new significant impacts or a substantial increase in the severity of significant effects previously identified for the Approved Project.

iv) Landslides?

The Certified EIR identified that the Project Site is not located within an area subject to landslides and no new landslide hazard zones or landslides have been identified on or near the Project Site after preparation and certification of the Certified EIR.^{5,6} Furthermore, no construction or other physical changes or improvements to the facility are proposed under the Modified Project. Therefore, the Modified Project would not have the potential to cause substantial adverse effects involving landslides and no impact would occur. No mitigation measures were required regarding landslides for the Approved Project, and none would be required for the Modified Project. Thus, the Modified Project would not involve substantial changes that would result in new significant impacts or a substantial increase in the severity of significant effects previously identified for the Approved Project.

b) Would the project result in substantial soil erosion or the loss of topsoil?

As previously discussed, no construction or other physical changes or improvements to the facility are proposed under the Modified Project. Therefore, the Modified Project would not have the potential to result in erosion and no impact would occur. No mitigation measures were required regarding erosion for the Approved Project, and none would be required for the Modified Project. Thus, the Modified Project would not involve substantial changes that would result in new significant impacts or a substantial increase in the severity of significant effects previously identified for the Approved Project.

c) Would the project be located on a geologic unit that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?

As previously discussed, no construction or other physical changes or improvements to the facility are proposed under the Modified Project. Therefore, the Modified Project would not have the potential to result in landslide, lateral spreading, subsidence, liquefaction, or collapse and no impact would occur. Although not required to reduce a significant impact, mitigation measures D1 through D8 were included for the Approved Project and required adherence to the site preparation and project design recommendations contained within the Approved Project's Geotechnical Report. Because the Modified Project would not involve site preparation or construction of any physical improvements, mitigation measures D1 through D8 would not be applicable the Modified Project. Thus, the Modified Project would not involve substantial changes that would result in new significant impacts

⁵ California Department of Conservation, California Geological Survey, EQ Zapp: California Earthquake Hazards Zone Application Interactive Map, <https://maps.conservation.ca.gov/cgs/EQZApp/app/>.

⁶ California Department of Conservation, California Geological Survey, Landslide Inventory Interactive Map, <https://maps.conservation.ca.gov/cgs/lsi/>.

or a substantial increase in the severity of significant effects previously identified for the Approved Project.

d) Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

As previously discussed, no construction or other physical changes or improvements to the facility are proposed under the Modified Project. Therefore, the Modified Project would not have the potential to create substantial risks associated with expansive soil and no impact would occur. No mitigation measures were required regarding expansive soil for the Approved Project, and none would be required for the Modified Project. Thus, the Modified Project would not involve substantial changes that would result in new significant impacts or a substantial increase in the severity of significant effects previously identified for the Approved Project.

e) Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

The Project Site remains served by existing wastewater disposal infrastructure. Furthermore, no construction or other physical changes or improvements to the facility are proposed under the Modified Project. Therefore, the Modified Project would not require septic tanks or other alternative wastewater disposal systems and as with the Approved Project, no impact would occur. No mitigation measures were required regarding septic tanks / alternative wastewater disposal systems for the Approved Project, and none would be required for the Modified Project. Thus, the Modified Project would not involve substantial changes that would result in new significant impacts or a substantial increase in the severity of significant effects previously identified for the Approved Project.

f) Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

As previously discussed, no construction or other physical changes or improvements to the facility are proposed under the Modified Project. Therefore, the Modified Project would not have the potential to destroy paleontological resources or geologic features and as with the Approved Project, no impact would occur. No mitigation measures were required regarding paleontological resources / geologic features for the Approved Project, and none would be required for the Modified Project. Thus, the Modified Project would not involve substantial changes that would result in new significant impacts or a substantial increase in the severity of significant effects previously identified for the Approved Project.

3.3.3 ANY NEW CIRCUMSTANCES INVOLVING NEW IMPACTS OR SUBSTANTIALLY MORE SEVERE IMPACTS?

Based on the above, there are no new circumstances involving new significant impacts or substantially more severe impacts related to geology and soils than previously analyzed in the Certified EIR.

3.3.4 ANY NEW INFORMATION REQUIRING NEW ANALYSIS OR VERIFICATION?

There is no new information of substantial importance that has become available relative to geology and soils impacts. No substantial changes in the environment related to geology and soils beyond those anticipated as part of the Approved Project have occurred since approval of the Approved Project and no new conditions have been identified within the vicinity of the Modified Project that would result in new or more severe significant environmental impacts. Finally, as determined above, since the Modified Project would not result in any new or substantially more severe geology and soils impacts, a review of additional feasible mitigation measures is not required.

3.3.5 MITIGATION MEASURES ADDRESSING IMPACTS?

The Certified EIR included the following geology and soils mitigation measures required for the Approved Project:

D-1 **Specific Requirements:**

- The proposed steel building shall be supported on foundations embedded into the alluvium or on foundations embedded into the existing compacted fill.
- The existing fill shall be removed and replaced as compacted fill to a depth equal to the depth of the proposed grade beam.
- The site shall be maintained by the operator as outlined in the Drainage and Maintenance section below.

D-2 **Drainage and Maintenance**

Maintenance of structures must be performed [sic] to avoid serious damage and/or instability to improvements. Most problems are associated with or triggered by water. Therefore, a comprehensive drainage system shall be designed and incorporated into the final plans. In addition, pad areas shall be maintained and planted in a way that will allow this drainage system to function as intended. The following are specific drainage, maintenance, and landscaping requirements.

Pad Drainage

Positive pad drainage shall be incorporated into the final plans. All drainage from the roof and pad shall be directed so that water does not pond adjacent to the foundations or flow toward them. All drainage from the site shall be collected and directed via non-erosive devices to a location approved by the building official. Planters placed adjacent to the structures shall be designed to drain away from the structure. Area drains, subdrains, weep holes, roof gutters and downspouts should be inspected periodically to ensure that they are not clogged with debris or damaged. If blockage or damage is evident, have it corrected.

Landscaping

All slopes shall be maintained with a dense growth of plants, ground-covering vegetation, shrubs, and trees that possess dense, deep root structures and require a minimum of irrigation. Plants surrounding the development shall be of a variety that requires a

minimum of watering. A landscape architect shall be consulted regarding planting adjacent to improvements. It will be the responsibility of the property owner to maintain the planting. Alterations of planting schemes shall be reviewed by the landscape architect.

Irrigation

An adequate irrigation system is required to sustain landscaping. Over-watering resulting in runoff and/or ground saturation must be avoided. Irrigation systems must be adjusted to account for natural rainfall conditions. Any leaks or defective sprinklers must be repaired immediately. To mitigate erosion and saturation, automatic sprinkling systems must be adjusted for rainy seasons. A landscape architect shall be consulted to determine the best times for landscape watering and the maximum amount of water usage.

D-3 **Grading and Earthwork**

Proposed grading will consist of removal and re-compaction of the upper fill and foundation excavations. All grading shall be carried forth as outlined below:

Flatland Grading

- Prior to commencement of work, a pre-grading meeting shall be held. Participants at this meeting will consist of the contractor, the owner or his representative, and the soils engineer. The purpose of the meeting is to avoid misunderstanding of the recommendations set forth in this report that might cause delays in the project.
- Prior to placement of fill, all vegetation, rubbish, and other deleterious material shall be disposed of off-site. The proposed structures shall be staked out in the field by a surveyor. This staking shall, as a minimum, include areas for over-excavation, toes of slopes, tops of cuts, setbacks, and easements. All staking shall be offset from the proposed grading area at least five feet. The proposed construction shall be excavated down to a depth of the proposed grade beam.
- The natural ground, that is determined to be satisfactory for the support of the filled ground, shall then be scarified to a depth of at least six inches and moistened as required. The scarified ground shall be compacted to at least 90 percent of the maximum laboratory density.
- The fill soils shall consist of materials approved by the project Soils Engineer or his representative. These materials may be obtained from the excavation areas and any other approved sources, and by blending soils from one or more sources. The material used shall be free from organic vegetable matter and other deleterious substances and shall not contain rocks greater than eight inches in diameter nor of a quantity sufficient to make compaction difficult.
- The approved fill material shall be placed in approximately level layers six inches thick and moistened as required. Each layer shall be thoroughly mixed to attain uniformity of moisture in each layer.

When the moisture content of the fill is three percent or more below the optimum moisture content, as specified by the Soils Engineer, water shall be added and

thoroughly mixed in until the moisture content is within three percent of the optimum moisture content.

When the moisture content of the fill is three percent or more above the optimum moisture content as specified by the Soils Engineer, the fill material shall be aerated by scarifying or shall be blended with additional materials and thoroughly mixed until the moisture content is within three percent or less of the optimum moisture content.

Each layer of fill material shall be compacted to a minimum of 90 percent of the maximum dry density as determined by ASTM D 1557, using approved compaction equipment. Where cohesion-less soil having less than 15 percent finer than 0.005 millimeters is used for fill, the fill material shall be compacted to a minimum of 95 percent of the maximum dry density.

- Review of the fill placement shall be provided by the Soils Engineer or his representative during the progress of grading. In general, density tests will be made at intervals not exceeding two feet of fill height or every 500 cubic yards of fill placed.
- During the inclement part of the year, or during periods when rain is threatening, all fill that has been spread and awaits compaction shall be compacted before stopping work for the day or before stopping because of inclement weather. These fills, once compacted, shall have the surfaces sloped to drain to one area where water may be removed.

Work may start again, after the rainy period once the site has been reviewed by the Soils Engineer and he has given his authorization to resume. Loose materials not compacted prior to the rain shall be removed and aerated so that the moisture content of these fills will be within three percent of the optimum moisture content.

Surface materials previously compacted before the rain, shall be scarified, brought to the proper moisture content, and re-compacted prior to placing additional fill, if deemed necessary by the Soils Engineer.

D-4 **Foundations**

The proposed structure shall be supported on foundations embedded into the alluvium or existing compacted fill.

Existing Compacted Fill

The minimum continuous footing size is 12 inches wide and 24 inches deep into the compacted fill, measured from the lowest adjacent grade of compacted fill. Continuous footings may be proportioned, using a bearing value of 1500 pounds per square foot. Column footings placed into the compacted fill may be proportioned, using a bearing value of 1500 pounds per square foot, and shall be a minimum of two feet in width and 24 inches deep, below the lowest adjacent grade of compacted fill.

The bearing values given above are net bearing values; the weight of concrete below grade may be neglected. These bearing values may be increased by one-third for temporary loads, such as wind or semi seismic forces.

Lateral loads may be resisted by friction at the base of the conventional foundations and by passive resistance within the existing compacted fill. A coefficient of friction of 0.4 may be used between the foundations and the compacted fill. The passive resistance may be assumed to act as a fluid with a density of 400 pounds per cubic foot. A maximum passive earth pressure of 5000 pounds per square foot may be assumed. For isolated poles, the allowable passive earth pressure may be doubled.

Alluvium

The minimum pile diameter is 24 inches. Piles shall extend into the alluvium a minimum of 5 feet. The piles may be proportioned using and bearing value of 4000 pounds per square foot.

All footing excavation depths will be measured from the lowest adjacent grade of recommended bearing material. Footing depths will not be measured from any proposed elevations or grades. Any foundation excavations that are not the recommended depth into the recommended bearing materials will not be acceptable to this office.

Lateral loads may be resisted by friction at the base of the conventional foundations and by passive resistance within the recommended compacted fill. A coefficient of friction of 0.4 may be used between the foundations and the compacted fill. The passive resistance may be assumed to act as a fluid with a density of 300 pounds per cubic foot. A maximum passive earth pressure of 4500 pounds per square foot may be assumed. For isolated poles, the allowable passive earth pressure may be doubled.

D-5 Settlement

Settlement of continuous footings is anticipated to be on the order of $\frac{1}{4}$ inches. Isolated footings shall have a settlement of $\frac{3}{4}$ inches. Differential settlement between the two foundation unit types is not expected to exceed $\frac{1}{2}$ inches.

D-6 Excavations

Excavations ranging in vertical height up to four feet are anticipated for the grading. Conventional excavation equipment may be used to make these excavations. Excavations shall expose fill. These soils shall be trimmed back at 1:1 slope gradient. This shall be verified by the project Soils Engineer during construction so that modifications can be made if variations in the soil occur.

All excavations shall be stabilized within 30 days of initial excavation. If this time is exceeded, the project Soils Engineer must be notified, and modifications, such as shoring or slope trimming may be required. Water shall not be allowed to pond on top of the excavation, nor to flow toward it. All excavations shall be protected from inclement weather. Excavations shall be kept moist, not saturated, to reduce the potential for raveling and sloughing during construction. No vehicular surcharge shall be allowed within three feet of the top of cut.

D-7 Plan Review and Plan Notes

The final grading, building, and/or structural plans shall be reviewed and approved by soils engineer to ensure that all mitigation measures are incorporated into the design or shown as notes on the plan.

The final plans shall reflect the following:

1. The Soils Engineering Investigation by GeoConcepts, Inc. is a part of the plans.
2. Plans must be reviewed and signed by the Soils Engineer.
3. All grading must be reviewed by the project Soils Engineer.
4. All foundations shall be reviewed by the project Soils Engineer.

Construction Review

D-8 Reviews will be required to verify all work. It is required that all footing excavations, seepage pits, and grading be reviewed by this office. This office should be notified at least two working days in advance of any field reviews so that staff personnel may be made available.

Mitigation measures D-1 through D-8 applied to site preparation and structural design of the Approved Project. Because no site preparation or structures are proposed, mitigation measures D-1 through D-8 would not be applicable to the Modified Project.

3.4 HAZARDS AND HAZARDOUS MATERIALS

	Impact Determination for Approved Project	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?	Mitigation Measures
Would the project:					
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	Less than Significant	No	No	No	Yes
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?					
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste	Less than Significant	No	No	No	No

	Impact Determination for Approved Project	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?	Mitigation Measures
within one-quarter mile of an existing or proposed school?					
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	No Impact	No	No	No	No
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	No Impact	No	No	No	No
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	Less than Significant	No	No	No	No
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	No Impact	No	No	No	No

3.4.1 IMPACT DETERMINATION IN THE CERTIFIED EIR

The Certified EIR stated that construction activities would not involve the transport, use, or disposal of hazardous materials. As such, it was concluded that the Approved Project would not create a significant hazard to the public or environment related to the routine transport, use, or disposal of hazardous materials or involving the release of hazardous materials into the environment and impacts would be less than significant during construction. Although not required to reduce a significant impact of the Approved Project, mitigation measures E-1 through E-4 were included and required best management practices for the prevention and cleanup of spills during construction.

The Certified EIR determined that operation of the Approved Project would not alter or affect the types of waste accepted for disposal at the Project Site and the existing operations would continue to be prohibited from accepting hazardous wastes. In addition, existing operations would continue to implement the Hazardous Waste Load Check Program and implementation of the Approved Project would not have the potential to alter or eliminate existing procedures to eliminate

hazardous materials. The Certified EIR identified that the Project Site is located within a designated Methane Zone; however, in accordance with City of Los Angeles Ordinance No 175,790 (Methane Mitigation Requirements), the Approved Project would be required to test and determine the methane concentration and pressure at the site and install an appropriate methane mitigation system. The Certified EIR concluded that impacts associated with the transport, use, or disposal of hazardous materials and the release of hazardous materials into the environment would be less than significant under operation of the Approved Project. Although not required to reduce a significant impact of the Approved Project, mitigation measures E-5 through E-7 were included and required continued adherence to waste screening and handling procedures and employee training regarding identifying and handling hazardous materials. Mitigation measures E-8 and E-9 also required the installation of a radiation detector and a methane mitigation system consistent with the requirements of Ordinance No. 175790.

The Initial Study prepared as part of the Certified EIR concluded that, based on the lack of the schools located within one-quarter mile of the Project Site and the small volume of hazardous materials infrequently handled at the Project Site, impacts related to the handling of such materials in proximity to schools would be less than significant under the Approved Project.

The Initial Study prepared as part of the Certified EIR determined that the Project Site was not included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, accordingly, concluded that no related impacts would occur because of implementation of the Approved Project.

The Initial Study prepared as part of the Certified EIR concluded that, based on the locations of the nearest airports to the Project Site, implementation of the Approved Project would have no impact regarding airport safety hazards.

The Initial Study prepared as part of the Certified EIR identified that implementation of the Approved Project would be subject to the provisions of existing emergency response and emergency evacuation plans that would be subject to the approval of the Los Angeles Fire Department in the course of its ministerial duties. As such, the Certified EIR concluded that impacts to emergency access or emergency response would be less than significant under the Approved Project.

The Initial Study prepared as part of the Certified EIR identified that the Project Site is not located in an area prone to wildland fires; therefore, it was concluded that implementation of the Approved Project would have no impact regarding wildland fire.

3.4.2 DO PROPOSED CHANGES INVOLVE NEW SIGNIFICANT IMPACTS OR SUBSTANTIALLY MORE SEVERE IMPACTS?

- a) **Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?**
- b) **Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?**

The Modified Project seeks to remove condition 17.g and 17.h from the site's operational permit and replace them with a condition limiting daily allowable tonnage to 6,700 tons with no limits on tonnage per material type. Although changes in the amounts of the types

of materials the facility accepts could occur under the Modified Project, the facility would continue to be permitted to accept only municipal solid waste, municipal and demolition and inert debris, green material, trim and cull material, and wood waste, and no new types of materials, including hazardous materials, would be transported, used, or disposed of by the facility under the Modified Project. The Modified Project proposed no changes to existing operations outside of eliminating tonnage limits for specific accepted materials. Although some accepted material types could have a higher change of containing hazardous materials than other types (e.g., demolition debris can contain asbestos or lead paint), all existing protocols, procedures, and plans currently implemented at the Project Site for the identification, refusal, and handling of hazardous materials as well as hazardous materials training of employees would continue to be implemented at the site. In addition, the Project Site is still designated as within a Methane Zone and would, accordingly, remain subject to the methane seepage and mitigation system requirements of City of Los Angeles Ordinance No 175,790. LAMC Division 71 codified Ordinance No 175,790 and establishes regulations for site-specific mitigation of methane seepage. Implementation of the Modified Project would not alter or interfere with the Project Site's abilities to mitigate methane seepage, nor would it involve any construction activities or new structures that would increase the site-specific methane concentrations or pressures or alter or impede the site's existing methane mitigation system in any way.

Therefore, as with the Approved Project, impacts related to the transport, use, or disposal of hazardous materials and the potential release of hazardous materials into the environment would be less than significant. Mitigation measures E-1 through E-4 established best management practices for the prevention and cleanup of spills occurring during construction of the Approved Project. Because the Modified Project would not include construction activities of any kind, mitigation measures E-1 through E-4 would not apply to the Modified Project. In addition, mitigation measures E-8 and E-9 required the Approved Project to install a radiation detector and a methane mitigation system at the Project Site. Because these systems have already been installed at the Project Site and because the Modified Project would not require and does not propose any construction or any new operational activities or changes to existing activities that would alter the Project Site or operations in a manner that would require modification to the existing level of radiation detection or methane mitigation, mitigation measures E-8 and E-9 would also not be applicable to the Modified Project. Although not required to reduce a significant impact of the Modified Project, mitigation measures E-5 through E-7, which require adherence to protocols and guidelines for load screening and hazardous waste training, identification, and handling, would continue to be implemented under the Approved Project. Thus, the Modified Project would not involve substantial changes that would result in new significant impacts or a substantial increase in the severity of significant effects previously identified for the Approved Project.

c) Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

The Certified EIR did not identify any schools within one-quarter mile of the Project Site and no new schools have been constructed or proposed for within one-quarter mile of the Project Site after the preparation and certification of the Certified EIR. Furthermore, the Modified Project does not propose any changes to the existing facility's operations or

operational permit, including the total daily allowed tonnage or types of materials accepted for disposal. The Modified Project would not require and does not propose changes to or elimination of any existing procedures or programs to identify, handle, or dispose of hazardous waste or materials that the facility implements in compliance with regulatory requirements or on a voluntary basis. Therefore, the Modified Project would not have the potential to emit hazardous emissions or handle hazardous or acutely hazardous materials, substance, or wastes beyond those currently emitted or handled at the Project Site. Regardless, no schools are located within one-quarter mile of the site; therefore, no impact would occur. No mitigation measures were required regarding proximity to schools for the Approved Project and none would be required for the Modified Project. Thus, the Modified Project would not involve substantial changes that would result in new significant impacts or a substantial increase in the severity of significant effects previously identified for the Approved Project.

d) Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

The Certified EIR incorrectly determined that the Project Site is not included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5; the Project Site (9189 DeGarmo Avenue) is listed on the State Water Resources Control Board's (SWRCB) list of leaking underground storage tank sites for the release of solvent or non-petroleum hydrocarbon into soil. However, the SWRCB reports the status of the case (T0603702312) as completed and the case was closed on September 2, 1997.⁷ Furthermore, the Modified Project does not propose any construction or other physical or operational changes that may encounter contaminated soils or groundwater. Therefore, implementation of the Modified Project would not create a significant hazard to the public or the environment because of the site's inclusion on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and as with the Approved Project, no impact would occur. No mitigation measures were required regarding hazardous materials sites for the Approved Project, and none would be required for the Modified Project. Thus, the Modified Project would not involve substantial changes that would result in new significant impacts or a substantial increase in the severity of significant effects previously identified for the Approved Project.

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?

The Certified EIR determined that the Project Site is not located within an airport land use plan or within two miles of a public airport. No new airports have been developed or proposed within the project area and no airport land use plans have been updated to include the project area after the preparation and certification of the Certified EIR. Furthermore, the Modified Project seeks to remove condition 17.g and 17.h from the site's operational permit and replace them with a condition limiting daily allowable tonnage to

⁷ California State Water Resources Control Board, GeoTracker list, Crown Disposal Company Inc (T0603732312), https://geotracker.waterboards.ca.gov/profile_report.asp?global_id=T0603702312.

6,700 tons with no limits on tonnage per material type. No new residents or employees would be generated by the Modified Project. As such, the Modified Project would not have the potential to result in a safety hazard or excessive noise for people residing or working in the project area and, as with the Approved Project, no impacts related to airport proximity would occur. No mitigation measures were required regarding airport hazards for the Approved Project, and none would be required for the Modified Project. Thus, the Modified Project would not involve substantial changes that would result in new significant impacts or a substantial increase in the severity of significant effects previously identified for the Approved Project.

f) Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

The Modified Project seeks to remove condition 17.g and 17.h from the site's operational permit and replace them with a condition limiting daily allowable tonnage to 6,700 tons with no limits on tonnage per material type. No construction or other physical changes to the built environment are proposed or would be required, including changes to existing site access or on- or off-site circulation. Emergency access both to the Project Site and the project area would remain as under existing conditions and the proposed revisions to the operational permit would not have the potential to interfere with or impair emergency response or evacuation plans. No impact would occur to such plans. No mitigation measures were required regarding emergency response or evacuation plans for the Approved Project, and none would be required for the Modified Project. Thus, the Modified Project would not involve substantial changes that would result in new significant impacts or a substantial increase in the severity of significant effects previously identified for the Approved Project.

g) Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

The Certified EIR identified the Project Site as located outside of areas prone to wildfire. The Modified Project would be located on the same Project Site, which remains outside of designated Fire Hazard Severity Zones.⁸ Furthermore, as previously discussed, the Modified Project seeks to remove condition 17.g and 17.h from the site's operational permit and replace them with a condition limiting daily allowable tonnage to 6,700 tons with no limits on tonnage per material type; no new structures are proposed and no additional population, including residents or employees, would be generated. In addition, no changes to operational safety or emergency procedures are proposed or would be required. Existing fire prevention and response protocols would continue to be implemented under the Modified Project. Therefore, the Modified Project would not have the potential to expose people or structures to wildland fires and no impact would occur. No mitigation measures were required regarding wildland fire for the Approved Project, and none would be required for the Modified Project. Thus, the Modified Project would not involve substantial changes that would result in new significant impacts or a substantial increase in the severity of significant effects previously identified for the Approved Project.

⁸ California Department of Forestry and Fire, FHSZ Viewer, <https://egis.fire.ca.gov/FHSZ/>.

3.4.3 ANY NEW CIRCUMSTANCES INVOLVING NEW IMPACTS OR SUBSTANTIALLY MORE SEVERE IMPACTS?

Based on the above, there are no new circumstances involving new significant impacts or substantially more severe impacts related to hazards and hazardous materials than previously analyzed in the Certified EIR.

3.4.4 ANY NEW INFORMATION REQUIRING NEW ANALYSIS OR VERIFICATION?

There is no new information of substantial importance that has become available relative to hazards and hazardous materials impacts. No substantial changes in the environment related to hazards and hazardous materials beyond those anticipated as part of the Approved Project have occurred since approval of the Approved Project and no new conditions have been identified within the vicinity of the Modified Project that would result in new or more severe significant environmental impacts. Finally, as determined above, since the Modified Project would not result in any new or substantially more severe hazards and hazardous materials impacts, a review of additional feasible mitigation measures is not required.

3.4.5 MITIGATION MEASURES ADDRESSING IMPACTS?

The Certified EIR included the following hazards and hazardous materials mitigation measures required for the Approved Project:

General Construction

Sediment carries with it other work-site pollutants such as pesticides, cleaning solvents, cement wash, asphalt, and car fluids that are toxic to sea life. Therefore, the following mitigation measures shall be required:

- E-1 All waste shall be disposed of properly. Use appropriately labeled recycling bins to recycle construction materials including solvents, water-based paints, vehicle fluids, broken asphalt, and concrete; wood, and vegetation. Non-recyclable materials/wastes shall be taken to an appropriate landfill.
- E-2 Leaks, drips and spills shall be cleaned up immediately to prevent contaminated soil on paved surfaces that can be washed away into the storm drains.
- E-3 Pavement shall not be hosed down in the event of a material spill. Dry cleanup methods shall be used whenever possible.
- E-4 All vehicle/equipment maintenance, repair, and washing shall be conducted away from storm drains. All major repairs shall be conducted off-site. Drip pans or drop cloths shall be used to catch drips and spills.

Operation

- E-5 In 2016 a full solid waste permit was issued to the facility that combined the front and back operations under a single permit and the completion of the enclosed building requirement, the 2007 Interim Operating Agreement is no longer required or in effect. The applicant shall follow guidelines pertaining to prohibited wastes, load checking program, load screening program, and hazardous and unacceptable materials handling procedures, as set forth by the LEA.

- E-6 Community Recycling & Resource Recovery shall include in their contracts with contractors and haulers that hazardous materials including asbestos, lead paint, and lead-painted materials shall not be accepted at the facility.
- E-7 Community Recycling & Resource Recovery shall train personnel to spot hazardous materials including asbestos, lead paint, and lead-painted materials and for the personal handling asbestos-containing material (ACM) to be certified to handle ACM. If no personnel on a work shift is certified, the protocol in the event that such materials are dumped at the site shall be to cone off the area and contact the appropriate agency immediately to handle the hazardous materials.
- E-8 Prior to the issuance of the building permit, the applicant shall install a radiation detector at the backyard green waste scale. This detector shall be the same or similar to the caliber of the detectors currently used at the Main Scale and at the Crown Vehicle Scale (on the 4.26-acre lot east of DeGarmo Avenue). This specific requirement is changed due to the site's re-configuration over the years. Scales in the backyard are for outgoing loads only. Radiation detectors are only required on inbound material load scales.
- E-9 The project applicant shall design and install a methane mitigation system that shall include but not be limited to measures such as passive, active, and miscellaneous mechanical venting systems, methane gas detection alarms, impermeable membrane beneath the enclosure, trench dam, cable or conduit seal fitting or additional vent risers. Pursuant to Ordinance No. 175790, the methane mitigation testing of the site shall be conducted under the supervision of a licensed Architect or registered Engineer or Geologist and shall be performed by a testing agency approved by the Los Angeles Department of Building and Safety.

Mitigation measures E-1 through E-4 were applicable to construction activities. Because no construction or other physical changes to the existing Project Site development or environment are proposed, mitigation measures E-1 through E-4 would not be applicable to the Modified Project.

Although not required to reduce a significant impact of the Modified Project, mitigation measures E-5 through E-9 would continue to be implemented at the Project Site under the Modified Project.

3.5 LAND USE AND PLANNING

	Impact Determination for Approved Project	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?	Mitigation Measures
Would the project:					
a. Physically divide an established community?	No Impact	No	No	No	No

	Impact Determination for Approved Project	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?	Mitigation Measures
b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	Less Than Significant	No	No	No	No

3.5.1 IMPACT DETERMINATION IN THE CERTIFIED EIR?

The Certified EIR determined that the Approved Project would not change existing land uses and as no changes would occur in the procedures governing the operation of CR&RR, the facility would continue to be compatible with the immediately surrounding land uses. Thus, the Approved Project would not divide nor disrupt the surrounding (established) community and no impacts are anticipated as a result of Approved Project.

The Certified EIR determined that the Approved Project would be generally consistent with the goals and policies of the following adopted plans: City of Los Angeles General Plan, the Sun Valley-La Tuna Canyon Community Plan, the Zoning Code, SCAG’s Regional Comprehensive Plan and Guide, and the Los Angeles County Siting Element.

The Certified EIR determined that the Approved Project would not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect and therefore, no impacts would be anticipated. Pursuant to LAMC Section 12.21 A.18(f), a Conditional Use Permit (CUP) is required for project operation.

The Project Site is not governed by a Habitat Conservation Plan. Further, the Project Site is in an area which has developed with commercial and industrial uses and is also within an industrialized area of the City of Los Angeles. The Project Site is in an area which has developed with commercial and industrial uses and is also within an industrialized area of the City of Los Angeles. Therefore, the Certified EIR determined that the Approved Project would not have the potential to cause such effects, and no impact would occur.

3.5.2 DO PROPOSED CHANGES INVOLVE NEW SIGNIFICANT IMPACTS OR SUBSTANTIALLY MORE SEVERE IMPACTS?

a) Would the project physically divide an established community?

The Modified Project seeks to remove Permit condition 17.g provide a replacement condition of 6,700 tons with no limits on tonnage per material type. Also, the Applicant

seeks to remove Permit Condition 17.h as it's no longer applicable. The Modified Project does not change the land uses as what was analyzed in the Certified EIR for the Approved Project. Therefore, the Modified Project would not have the potential to alter the conclusions of the Certified EIR regarding the physical division of an established community. No established communities would be divided, and no related impact would occur.

b) Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

Regionally, the Project Site is located within the planning area of SCAG, the federally designated metropolitan planning organization. SCAG is responsible for reviewing regionally significant local plans, projects, and programs for consistency with SCAG's adopted regional plans. The Modified Project seeks to remove Permit condition 17.g provide a replacement condition of 6,700 tons with no limits on tonnage per material type. Also, the Applicant seeks to remove Permit Condition 17.h as it's no longer applicable. The Modified Project does not change the analysis or conclusions of the policy consistency discussion provided in the Certified EIR as the tonnage limits does not change. The Modified Project is also located within the regional planning area of the SCAQMD AQMP. As evaluated in Checklist Section 3.2, Air Quality, the Modified Project is consistent with the currently applicable AQMP, and no further analysis is required.

The Approved Project was found to be generally consistent with the goals and policies of the following adopted plans: City of Los Angeles General Plan, the Sun Valley-La Tuna Canyon Community Plan, the Zoning Code, SCAG's Regional Comprehensive Plan and Guide, and the Los Angeles County Siting Element. The Modified Project seeks to condition 17.g provide a replacement condition of 6,700 tons with no limits on tonnage per material type. Therefore, the Modified Project would also be generally consistent with the goals and policies of the City of Los Angeles land use planning documents (as mentioned above) as the tonnage limits does not change from the analysis provided in the Approved Project. Thus, the Modified Project would not involve substantial changes that would result in new significant impacts or a substantial increase in the severity of significant effects previously identified in the Certified EIR for the Approved Project.

3.5.3 ANY NEW CIRCUMSTANCES INVOLVING NEW IMPACTS OR SUBSTANTIALLY MORE SEVERE IMPACTS?

Based on the above, there are no new circumstances involving new significant impacts or substantially more severe impacts related to land use than previously analyzed in the Certified EIR.

3.5.4 ANY NEW INFORMATION REQUIRING NEW ANALYSIS OR VERIFICATION?

There is no new information of substantial importance that has become available relative to land use impacts. No substantial changes in the environment related to land use beyond those anticipated as part of the Approved Project have occurred since adoption of the Certified EIR and no new conditions have been identified within the vicinity of the Modified Project that would result in new or more severe significant environmental impacts. Finally,

as determined above, since the Modified Project would not result in any new or substantially more severe land use impacts, a review of feasible mitigation measures is not required.

3.5.5 MITIGATION MEASURES ADDRESSING IMPACTS?

No mitigation measures regarding land use were identified in the Certified EIR for the Approved Project and none would be required for the Modified Project.

3.6 NOISE

	Impact Determination for Approved Project	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?	Mitigation Measures
Would the project result in:					
a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	Less than Significant	No	No	No	No
b. Generation of excessive groundborne vibration or groundborne noise levels?	NA	No	No	No	No
c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	NA	No	No	No	No

3.6.1 IMPACT DETERMINATION IN THE ADOPTED EIR

The Certified EIR identified the nearest noise-sensitive receptor to the Project Site as residential uses located approximately 1,800 feet to the southeast. The Approved Project's noise analysis determined that daytime construction of the Approved Project could produce noise levels as high as 54.7 decibels (dBA) 50 feet from the nearest sensitive receptor, which complies with the 75 dBA at 50 feet from residential uses limit established in LAMC Section 112.05. In addition, it was determined that nighttime construction of the Approved Project could produce noise levels as high as 58.2 dBA, an increase of 3.4 dBA over existing nighttime ambient noise level, which would

comply with the 5 dBA increase criteria contained in the L.A. CEQA Thresholds Guide. As such, the Certified EIR concluded that construction-related noise impacts of the Approved Project would be less than significant.

The Certified EIR calculated that increased traffic associated with operation of the Approved Project would increase local noise levels at noise-sensitive locations along the study area roadway segments in the vicinity of the Project Site by a maximum of 2.9 dBA community noise equivalent levels (CNEL), which would not exceed the applicable 3.0-dBA-CNEL increase significance threshold established in the L.A. CEQA Threshold Guide. In addition, the Certified EIR calculated that, with inclusion of the Approved Project's new fencing along the southern, northern, and eastern boundaries, operation of the Approved Project's wet air scrubber system could generate noise levels of approximately 72 dBA CNEL at the property line of the surrounding industrial uses. In addition, the Certified EIR calculated that noise resulting from the Approved Project's HVAC system could range between 57 to 72 dBA CNEL. Neither of these on-site operational sources of noise would exceed the 75-dBA-CNEL exterior significance threshold for industrial uses. Based on the above, the Certified EIR concluded that operational noise impacts of the Approved Project would be less than significant.

The Certified EIR identified the nearest vibration-sensitive receptor to the Project Site as residential uses located approximately 1,800 feet to the southeast. The Approved Project's vibration analysis determined that construction of the Approved Project could produce vibration levels of approximately 57.4 vibration decibels (VdB) at the nearest sensitive receptor, which would not exceed the Federal Transit Authority's applicable 8-VdB significance threshold for residential uses. As such, the Certified EIR concluded that construction-related vibration impacts of the Approved Project would be less than significant.

The Certified EIR identified the nearest airports to the Project Site are the Whiteman Airport located approximately 2.2 miles to the north, the Bob Hope Airport (now the Hollywood Burbank Airport) located approximately 4.8 mile to the south, and the Van Nuys Airport located approximately 12.8 miles to the southwest. The Project Site was determined to be located outside of the regulatory noise contours for these and all airports. As such, the Certified EIR concluded that the Approved Project would not expose people to excessive noise levels associated with airports and no related impacts would occur.

3.6.2 DO PROPOSED CHANGES INVOLVE NEW SIGNIFICANT IMPACTS OR SUBSTANTIALLY MORE SEVERE IMPACTS?

a) Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Elimination of material-specific, daily permitted capacity from the existing facility's current operational permit would not involve new construction or other physical changes and no new or expanded uses or equipment would be required. Therefore, the Modified Project would not have the potential to result in any new impacts or an increase in the severity of a previously identified impact associated with construction or on-site operational noise. In addition, as detailed below in Section 3.7.2(b), the Modified Project would result in similar or fewer daily trips as evaluated for the Approved Project and no new impacts associated with traffic would occur. Therefore, the Modified Project would also not result in any new

impacts or an increase in the severity of previously identified impacts associated with off-site (i.e., mobile) noise sources.

Accordingly, as with the Approved Project impacts related to ambient noise levels under the Modified Project would be less than significant. No mitigation measures were previously required regarding noise in the Certified EIR for the Approved Project and none would be required now. Thus, the Modified Project would not involve substantial changes that would result in new significant impacts or a substantial increase in the severity of significant effects previously identified.

b) Would the project result in generation of excessive groundborne vibration or groundborne noise levels?

Under the Modified Project, no new construction or other physical changes would occur and no new or expanded uses or equipment would be required. Accordingly, no impacts related to construction vibration would occur, which would be less than the less-than-significant impacts identified for the Approved Project in the Certified EIR. The Certified EIR did not evaluate vibration associated with operational activities of the Approved Project. However, because the Modified Project would not involve the addition of new or expansion or other changes to existing vibration-generating equipment (e.g., stationary mechanical equipment, machinery, etc.) and due to the rapid attenuation characteristics of groundborne vibration and distance to receptors, there would be no potential for operation of the Modified Project to result in impacts associated with groundborne vibration. No mitigation measures were previously identified in the Certified EIR regarding vibration for the Approved Project and none would be required now. Thus, the Modified Project would not involve substantial changes that would result in new significant impacts or a substantial increase in the severity of significant effects previously identified.

c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

The Modified Project would involve the same Project Site, located the same distances from airports as evaluated in the Certified EIR for the Approved Project. No new airports have been constructed and no existing airports or their associated regulatory noise contours have been expanded in the vicinity of the Project Site after certification of the Certified EIR. Furthermore, the facility operator does not expect to hire additional employees under the Modified Project. Therefore, as with the Approved Project, the Modified Project would not expose people to excessive airport noise levels and no impact would occur. No mitigation measures were previously identified in the Certified EIR regarding airport noise for the Approved Project and none would be required now. Thus, the Modified Project would not involve substantial changes that would result in new significant impacts or a substantial increase in the severity of significant effects previously identified.

3.6.3 ANY NEW CIRCUMSTANCES INVOLVING NEW IMPACTS OR SUBSTANTIALLY MORE SEVERE IMPACTS?

Based on the above, there are no new circumstances involving new significant impacts or substantially more severe impacts related to noise than previously analyzed in the Certified EIR.

3.6.4 ANY NEW INFORMATION REQUIRING NEW ANALYSIS OR VERIFICATION?

There is no new information of substantial importance that has become available relative to noise impacts. No substantial changes in the environment related to noise beyond those anticipated as part of the Approved Project have occurred since approval of the Approved Project and no new conditions have been identified within the vicinity of the Modified Project that would result in new or more severe significant environmental impacts. Finally, as determined above, since the Modified Project would not result in any new or substantially more severe noise impacts, a review of additional feasible mitigation measures is not required.

3.6.5 MITIGATION MEASURES ADDRESSING IMPACTS?

No mitigation measures regarding noise were identified for the Approved Project and none would be required for the Modified Project.

3.7 TRANSPORTATION

	Impact Determination for Approved Project	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?	Mitigation Measures
Would the project:					
a. Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	No Impact	No	No	No	No
b. Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	NA	No	No	No	No
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	Less than Significant	No	No	No	No
d. Result in inadequate emergency access?	Less than Significant	No	No	No	No

The analysis presented in this section is based, in part, on the Approved Project's Certified EIR and the Trip Generation and VMT Screening Assessment for 9147 DeGarmo Avenue Recycling Facility Memorandum⁹ (Transportation Memo) prepared for the Modified Project by Fehr & Peers in November 2023. The Transportation Memo is included as **Appendix A** to this Addendum and its findings, conclusions, and recommendations are incorporated by reference herein.

3.7.1 IMPACT DETERMINATION IN THE CERTIFIED EIR

The Certified EIR stated that the Approved Project was not expected to conflict with adopted policies, plans, or programs supporting alternative transportation (i.e., transit, bicycle, or pedestrian facilities) and concluded that no impacts to such facilities would occur as a result of implementation of the Approved Project.

The Certified EIR calculated that the Approved Project would generate a net total increase of approximately 265 AM peak hour trips and 309 PM peak hour trips. When added to areawide traffic growth and cumulative project traffic generation and adjusting capacity for future system improvements, four of 11 study intersections (specifically, I-5 Southbound Ramps & Penrose Street; Bradley Avenue & Penrose Street; Glenoaks Boulevard & Randall Street; and Glenoaks Boulevard & Tuxford Street) would be significantly impacted by the Approved Project. Mitigation Measure H-1 was included and required an additional eastbound left-turn lane on Tuxford Street and modification of the existing signal to protect left-turn phasing. Mitigation Measure H-2 was included and required the addition of an eastbound right-turn lane at the intersection of the I-5 Southbound Ramps and Penrose Street. Mitigation Measure H-3 was included and required the installation of a traffic signal at the intersection of Glenoaks Boulevard and Randall Street. Mitigation Measure H-4 was included and required the addition of a left-turn lane on the eastbound approach to the Bradley Avenue/Penrose Street intersection and associated signal modification. Mitigation Measure H-5 was included and required the staggering of truck departure from the Project Site. Mitigation Measure H-6 was included and prohibited, except for local collection trucks and in case of emergency directives from law enforcement or the fire department, truck trips on Sheldon Street from Laurel Canyon Boulevard to San Fernando Road during school hours. The Certified EIR concluded that Mitigation Measures H-1 through H-4 would reduce impacts to the three intersections to less-than-significant levels.

The Certified EIR determined that the Approved Project did not meet the criteria in the Congestion Management Plan (CMP) for an arterial intersection analysis, or a transit impact analysis. Additionally, analysis conducted of four mainline freeway segments along the I-5 freeway near the Project Site indicated that the traffic associated with the Approved Project would result in a 0.4 percent change and 0.5 percent change in volume to capacity ratio during AM and PM peak hours, respectively, which would not exceed the 2 percent change significance threshold established in both the Los Angeles County Congestion Management Program and the City of Los Angeles CEQA Thresholds Guide.

The Certified EIR determined that the Approved Project would not include any major changes to current intersections, ingress/egress, or street segments and was designed to use existing streets, driveways, and traffic signals. In addition, it was stated that no new circulation would be

⁹ Fehr & Peers, Trip Generation and VMT Screening Assessment for 9147 DeGarmo Avenue Recycling Facility Memorandum, November 1, 2023.

created by the Approved Project. Accordingly, the Certified EIR concluded that impacts related to design feature hazards would be less than significant.

Based on the same reasoning, the Certified EIR also concluded that the Approved Project would not result in inadequate emergency access and such impacts would also be less than significant.

3.7.2 DO PROPOSED CHANGES INVOLVE NEW SIGNIFICANT IMPACTS OR SUBSTANTIALLY MORE SEVERE IMPACTS?

a) **Would the project conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?**

The City has adopted programs, plans, ordinances, and policies that establish the transportation planning framework for all travel modes. The overall goals of these documents and policies are to achieve a safe, accessible, and sustainable transportation system for all users. The Modified Project's consistency with these plans and policies is presented below:

- **Los Angeles Mobility Plan 2035:** The Mobility Plan 2035 contains Citywide policies and programs related to pedestrian infrastructure, locally serving streets, bus service, bicycle facilities, vehicular access to freeways, loading areas, and driveway access. These policies and programs do not apply because no changes to such infrastructure and facilities would occur under the Modified Project. No conflict would occur.
- **Plan for Health LA:** The Plan for a Health Los Angeles provides health-related policies for traffic management and additional local bus services. The Modified Project would not preclude the City from achieving health-related goals as they related to transportation. No conflict would occur.
- **Specific Plans:** The Project Site is not located within any specific plan areas. No conflict would occur.
- **LAMC Section 12.21 A.16 (Bicycle Parking):** LAMC Section 12.21 A.16 establishes parameters related to bicycle parking spaces and facilities for employee showers and lockers. The Modified Project does not propose and would not require bicycle parking spaces or shower facilities as no changes to employment are anticipated. No conflict would occur.
- **LAMC Section 12.26 J (TDM Ordinance):** LAMC Section 12.21.J. establishes parameters related to transportation demand management (TDM) and trip reduction measures. The Modified Project would not conflict with an established TDM or related trip reduction measures. No conflict would occur.
- **Vision Zero Action Plan and Vision Zero Corridor Plan:** There are no Vision Zero safety improvements identified for the intersections or corridors in the vicinity of the Project Site. No conflicts would occur.
- **Streetscape Plans:** The Project Site is not located within a designated City of Los Angeles Streetscape Plan area. No conflicts would occur.

- **Citywide Design Guidelines:** Citywide Design Guideline 1, Guideline 2, and Guideline 3 promote comfortable, accessible, and a safe pedestrian experience, including as it relates to vehicular access and human-scale development. The Modified Project would not result in any physical changes to pedestrian infrastructure or experiences, including access points, parking, driveways, signage, or scale. No conflicts would occur.

The 2020 Los Angeles Department of Transportation’s Transportation Assessment Guidelines (TAG) establishes that projects which generally conform to the City’s development policies and standards will generally be consistent. Therefore, based on the above, as with the Approved Project, the Modified Project would have no impact with respect to its potential to conflict with a program, plan, or ordinance addressing the circulation system. Thus, the Modified Project would not involve substantial changes that would result in new significant impacts or a substantial increase in the severity of significant effects previously identified in the Certified EIR for the Approved Project.

b) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

In 2013, California Senate Bill (SB) 743 was signed, with the intent to “more appropriately balance the needs of congestion management with statewide goals related to infill development, promotion of public health through active transportation, and reduction of greenhouse gas emissions.” When implemented, “traffic congestion shall not be considered a significant impact on the environment” within CEQA transportation analysis. SB 743 required the Governor’s Office of Planning and Research (OPR) to identify new metrics for identifying and mitigating transportation impacts within CEQA. For land use projects, OPR identified Vehicle Miles Traveled (VMT) per capita, VMT per employee, and net VMT as new metrics for transportation analysis. Regulatory changes to the CEQA Guidelines that implement SB 743 were approved on December 28, 2018. Accordingly, the Certified EIR did not directly analyze CEQA Checklist Question 3.17(b) and the previous analysis of the Approved Project’s consistency with congestion management plans and LOS impacts is no longer consistent with current approaches to evaluating transportation impacts of a project. Therefore, a full analysis of the Modified Project’s consistency with CEQA Guidelines Section 15064.3 subdivision (b) is provided herein.

The Certified EIR estimated that the Approved Project would generate up to 5,400 daily Passenger Car Equivalent (PCE) trips (2,700 trips in and 2,700 trips out) under a 6,700 tons per day limit with 64 percent of the material arriving by heavy-duty trucks, and 36 percent of the material arriving by autos and light or medium-duty trucks.¹⁰ Daily load indicates that the Project Site receives an average of 1,609 tons per day and receives 86 percent of loads on trucks carrying at least one ton of material.^{11,12} **Table 3-1, Certified EIR Estimates and Vehicle Mix Compared to Current Operations**, illustrates how the distribution of vehicles delivering material to the Project Site has shifted towards larger

¹⁰ The Revised Final EIR estimated net new peak hour trips using a PCE factor of 2.0 autos for each truck trip. The total daily trip generation estimates presented in the Revised Final EIR thus represent PCE-adjusted trips with a PCE factor of 2.0 for truck trips.

¹¹ Athens Services, SEPT LOADS, September 2023.

¹² One load is assumed to be equivalent to 2.0 non-PCE trips (one inbound trip and one outbound trip).

commercial trucks over the last 10 years and that the facility operates well within the Certified EIR's daily trip estimates.

**Table 3-1
Certified EIR Estimates and Vehicle Mix Compared to Current Operations**

Data Source	Tons per Day	Vehicle Mix ¹		Total Daily Trips ²
		Light and Medium Duty Vehicles (<1 ton loads)	Heavy Duty Trucks (1+ ton loads)	
Certified EIR ³ (July 2014)	6,700	36%	64%	5,400
Current Operations ⁴ (September 2023)	1,609	14%	86%	1,096
¹ Vehicle mix is based on daily loads, which do not incorporate a PCE adjustment. ² Total daily trips (PCE) assume a PCE factor of 2.0 for truck trips. ³ Community Recycling & Resource Recovery Inc., Revised Final Environmental Impact Report: Sun Valley – La Tuna Canyon Community Plan Area – Community Recycling and Resource Recovery Facility, July 2014. ⁴ Athens Service, SEPT LOADS, September 2023.				

Under the Modified Project, the facility would no longer be bound by material-specific capacity limits but would retain the existing 6,700 tons per day overall capacity limit. **Table 3-2, Total Daily Trip Estimates for Possible Future Modified Project Scenarios**, summarizes the effects on daily trips that could occur under a range of scenarios related to vehicle mix and/or daily capacity at the Project Site.

**Table 3-2
Total Daily Trip Estimates for Possible Future Modified Project Scenarios**

Scenario	Tons per Day	Vehicle Mix ¹		Total Daily Trips ²	Exceeds Approved Project Trips?
		Light and Medium Duty Vehicles (<1 ton loads)	Heavy Duty Trucks (1 ton loads)		
Vehicle Mix Changes Only					
A: Vehicle mix reflects national average	1,609	20%	80%	1,133	No
B: Vehicle mix reflects assumptions in Certified EIR	1,609	36%	64%	1,255	No
Capacity Changes Only					
C: capacity reaches maximum allowable limit and current vehicle mix remains unchanged	6,700	14%	86%	4,565	No
Vehicle Mix and Capacity Changes Only					
D: capacity reaches maximum allowable limit and vehicle mix reflects national average	6,700	20%	80%	4,715	No
E: capacity reaches maximum allowable limit and vehicle mix reflects	6,700	36%	64%	5,227	No

**Table 3-2
Total Daily Trip Estimates for Possible Future Modified Project Scenarios**

Scenario	Tons per Day	Vehicle Mix ¹		Total Daily Trips ²	Exceeds Approved Project Trips?
		Light and Medium Duty Vehicles (<1 ton loads)	Heavy Duty Trucks (1 ton loads)		
assumptions in Certified EIR					
F: capacity reaches maximum allowable limit and vehicle mix shifts to daily trips estimated in the Certified EIR	6,700	41%	59%	5,400	No
¹ Vehicle mix is based on daily loads, which do not incorporate a PCE adjustment. ² Total daily trips (PCE) assumes a PCE factor of 2.0 for truck trips. Sources: Community Recycling & Resource Recovery Inc., Revised Final Environmental Impact Report: Sun Valley – La Tuna Canyon Community Plan Area – Community Recycling and Resource Recovery Facility, July 2014; Athens Service, SEPT LOADS, September 2023.					

As shown in **Table 3-2**, even if removing material-specific capacity limits under the Modified Project results in an increase in tons per day or an increase in the share of loads coming in from smaller vehicles, these changes would result in similar or fewer daily trips at the facility relative to the maximum daily trips calculated for the Approved Project. This finding supports the conclusion that no new traffic impacts would occur under the Modified Project that were not disclosed in the Certified EIR.

Site-generated vehicle miles traveled (VMT) is comprised of inbound loads, outbound loads, and employee commute trips. The Certified EIR states that waste delivered to the facility is primarily generated within a 20-mile radius. Elimination of material-specific, daily permitted capacity from the existing facility’s current operational permit would not alter the origin of incoming loads or outbound destinations, so it is reasonable to assume that trips to and from the Project Site under the Modified Project would continue to occur within the existing service area. The Certified EIR states that 165 employees worked at the facility across multiple weekday and weekend day shifts under baseline conditions and estimated that an additional 28 employees would be hired, which amounts to a total of 193 employees that could work at the Project Site under the Approved Project. As of March 2023, the Project Site employs 187 people.¹³ The facility operator does not expect to hire additional employees under the Modified Project. Because the service area of the facility would be unchanged and the total number of employees and maximum daily trips would not exceed what was estimated in the Certified EIR, it is concluded that the Modified Project would not result in an increase in total Site-generated VMT relative to the Approved Project in the entitlement documents. Therefore, the Modified Project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b).

Although the Certified EIR did not directly analyze the VMT associated with the Approved Project, its analysis of the Approved Project’s traffic/trip generation impacts required Mitigation Measures H-1 through H-4 to reduce impacts to four study area intersections.

¹³ Crown Recycling Services, Transfer/Processing Report, March 2023.

However, as discussed above, the Certified EIR analyzed impacts based on criteria such as intersection level of service, average daily traffic volumes, and peak-hour trips. Because the CEQA Guidelines now state that VMT is the most appropriate measure of transportation impacts and that automobile delay including measures of vehicular capacity or traffic congestion shall not be considered a significant impact on the environment, the mitigation measures required for the Approved Project are no longer applicable. Furthermore, the intersection improvements required by the mitigation measures for the Approved Project are in the process of being implemented. The Certified EIR also required Mitigation Measures H-5 and H-6, which pertain to facility operations and would still be applicable and implemented under the Modified Project. Because the Modified Project would result in less-than-significant impacts with regard to VMT, no additional mitigation measures would be required with regard to consistency with CEQA Guidelines section 15064.3, subdivision (b). Thus, the Modified Project would not involve substantial changes that would result in new significant impacts or a substantial increase in the severity of significant effects previously identified in the Certified EIR.

c) Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Elimination of material-specific, daily permitted capacity from the existing facility's current operational permit would not have the potential to result in any new impacts or an increase in the severity of a previously-identified impact associated with geometric design features or incompatible uses. No new construction or other physical changes would occur and no new or expanded uses or equipment would be required. Accordingly, no impacts related to hazards associated with geometric design features or incompatible uses would occur, which would be less than the less-than-significant impacts identified for the Approved Project in the Certified EIR. No mitigation measures were previously required with regard to geometric design features and incompatible uses for the Approved Project and none would be required now. Thus, the Modified Project would not involve substantial changes that would result in new significant impacts or a substantial increase in the severity of significant effects previously identified in the Certified EIR.

d) Would the project result in inadequate emergency access?

Elimination of material-specific, daily permitted capacity from the existing facility's current operational permit would not have the potential to result in any new impacts or an increase in the severity of a previously-identified impact to emergency access. No new construction or other physical changes would occur under the Modified Project; including to existing on- or off-site circulation patterns or physical improvements (e.g., roadways or driveways). No changes would occur that would have the potential to impede emergency access or travel either on- or off-site. Therefore, no impacts to emergency access would occur, which would be less than the less-than-significant impacts identified for the Approved Project in the Certified EIR. No mitigation measures were previously required with regard to emergency access for the Approved Project and none would be required now. Thus, the Modified Project would not involve substantial changes that would result in new significant impacts or a substantial increase in the severity of significant effects previously identified in the Certified EIR.

3.7.3 ANY NEW CIRCUMSTANCES INVOLVING NEW IMPACTS OR SUBSTANTIALLY MORE SEVERE IMPACTS?

Based on the above, there are no new circumstances involving new significant impacts or substantially more severe impacts related to transportation than previously analyzed in the Certified EIR.

3.7.4 ANY NEW INFORMATION REQUIRING NEW ANALYSIS OR VERIFICATION?

There is no new information of substantial importance that has become available relative to transportation impacts. No substantial changes in the environment related to transportation beyond those anticipated as part of the Approved Project have occurred since approval of the Approved Project and no new conditions have been identified within the vicinity of the Modified Project that would result in new or more severe significant environmental impacts. Finally, as determined above, since the Modified Project would not result in any new or substantially more severe transportation impacts, a review of additional feasible mitigation measures is not required.

3.7.5 MITIGATION MEASURES ADDRESSING IMPACTS?

The Certified EIR included the following transportation mitigation measures required for the Approved Project:

Glenoaks Boulevard & Tuxford Street

H-1 This intersection of Glenoaks Boulevard and Tuxford Street can be mitigated during both peak periods with an additional eastbound left-turn lane on Tuxford Street. This mitigation could be accomplished within the existing right-of-way and would require re-striping the west leg of Tuxford Street. This would result in the following lane configuration and widths: a 20-foot westbound curb lane with parking; a 10-foot westbound through lane; dual 11-foot eastbound left-turn lanes; a 10-foot eastbound through lane; and a 20-foot eastbound curb lane with parking. The recommended mitigations meet the minimum LADOT design standards. The signal would be modified to provide protected left-turn phasing on Tuxford Street.

I-5 Southbound Ramps & Penrose Street

H-2 The project impact at the intersection of the I-5 Southbound Ramps and Penrose Street could be mitigated during both peak periods with the addition of an eastbound right-turn lane. Although the intersection is unsignalized and signal warrants were performed, physical improvements are the recommended mitigation measure. The physical improvement would require re-striping the eastbound approach, which currently provides a 25-foot shared through/right-turn lane. The eastbound approach could be re-striped to provide a 13-foot through lane and a 12-foot right-turn lane. Parking restrictions would be required along 240 feet of the south curb of Penrose Street.

Glenoaks Boulevard & Randall Street

H-3 The project impact at the intersection of Glenoaks Boulevard and Randall Street could be mitigated during both peak periods with the installation of a traffic signal. A signal warrant analysis was performed, and Warrants 2 and 3 were each satisfied. Therefore,

signalization is recommended to reduce the impact at this location to less than significant levels.

Bradley Avenue & Penrose Street

H-4 On the eastbound approach the addition of a 12-foot left-turn lane is proposed. The approach will require shifting the existing through lane 12 feet south to accommodate the left-turn lane. A 245-foot taper will be added to accommodate this lane shift. No widening of this approach is proposed; the 12' through lane will be located in an existing 21-foot-wide section of the roadway that is striped-out for traffic/parallel parking. The resulting eastbound approach configuration from the centerline will be a 12-foot' left-turn lane, a 12-foot' through/right-turn lane, and 9 feet of curb parking.

On the eastbound departure, realignment of the receiving lane to align with the proposed eastbound through lane is proposed. The departure will require a 12-foot shift of the existing receiving lane and a 245-foot taper. The section of roadway to accommodate the shifted lane is currently unimproved; property records indicate that the necessary right-of-way is already dedicated. An approximately 225-foot section of the roadway would require paving to the half roadway standard of a Secondary Highway designation or 45 feet. The installation of curb, gutter, and sidewalk would also be required as part of these improvements. The resulting eastbound departure configuration from the centerline will be a variable width painted median (maximum 12-foot width) and a 12-foot through lane transitioning back to the centerline, approximately 245 feet east of the intersection.

Signal modification will also be required due to the reconfiguration of the eastbound approach. The extent of the signal improvement may include installation/relocation of loop detectors, the upgrading of signal heads, and revisions to the signal plan.

H-5 To the extent feasible, the applicant shall stagger the timing of trucks departing from the Project Site to prevent platooning.

H-6 The project applicant shall not run trucks under his control on Sheldon Street from Laurel Canyon Boulevard to San Fernando Road during school hours, except for local collection trucks working in the area, and except in the case of an emergency where the applicant may be directed to use this street by the local law enforcement or fire department.

Mitigation Measures H-1 through H-6 required intersection improvements to reduce impacts to four study area intersections. Because the CEQA Guidelines now state that VMT is the most appropriate measure of transportation impacts and that automobile delay including measures of vehicular capacity or traffic congestion shall not be considered a significant impact on the environment, the mitigation measures required for the Approved Project are no longer applicable. Furthermore, the intersection improvements required by the mitigation measures for the Approved Project are in the process of being implemented.

Although not required to reduce a significant impact of the Modified Project, Mitigation Measures H-5 through H-6 would continue to be implemented at the Project Site under the Modified Project.

4 ADDENDUM CONCLUSION

As demonstrated by the discussion above, impacts associated with the Modified Project would be similar to or less than the impacts addressed in the Certified EIR. No substantial changes would occur with respect to the circumstances under which the Modified Project is undertaken that will require major revisions of the Certified EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects. In addition, no new information of substantial importance has become available relative to any of the environmental topic categories that would result in new or more severe significant environmental impacts. In addition, the applicable mitigation measures included as part of the Certified EIR would continue to be implemented under the Modified Project. As all of the impacts of the Modified Project would be within the envelope of impacts analyzed in the Certified EIR, none of the conditions described in PRC Section 21166 and CEQA Guidelines Sections 15162 and 15163 requiring a Supplemental or Subsequent EIR would occur. Additionally, there are no known mitigation measures or Project alternatives that were previously considered infeasible but are now considered feasible that would substantially reduce one or more significant effects on the environment identified in the Certified EIR. Therefore, the Modified Project would not create any potential adverse impacts beyond those evaluated in the Certified EIR. As such, the preparation of an addendum that amends the Project Description in the Certified EIR to include the Modified Project is appropriate and fully complies with the requirements of PRC Section 21166 and CEQA Guidelines Sections 15162, 15163, and 15164.

APPENDICES

A Trip Generation and VMT Screening Assessment Memorandum

Memorandum

Date: November 1, 2023

To: Curtis Zacuto, EcoTierra Consulting
David Oeffling, Athens Services

From: Netai Basu, AICP, CTP and Nata Kovalova, Fehr & Peers

Subject: Trip Generation and VMT Screening Assessment for 9147 De Garmo Avenue Recycling Facility

LA23-3490

This memorandum presents trip generation estimates and the results of a VMT screening assessment for the proposed changes to the Solid Waste Facilities Permit ("Permit") at 9147 De Garmo Avenue. Based on these analyses and the requirements for non-CEQA transportation analysis in the City of Los Angeles Transportation Assessment Guidelines ("City Guidelines"), the proposed changes to the Permit will not impact total site-generated VMT or commute VMT per employee, and do not require further transportation analysis.

Project Description

The project site is located at 9147 De Garmo Avenue, Sun Valley, CA and has long been developed with a comprehensive recycling and waste diversion facility that is currently operated by Athens Services. A Final Revised Environmental Impact Report ("EIR") was completed in July 2014 for a project that included two enclosure buildings and a revised Permit, allowing the facility to increase the amount of material received from 4,600 tons per day (TPD) to 6,700 TPD. The revised Permit specified daily tonnage limits by material: up to 2,500 TPD municipal solid waste, up to 2,000 TPD of construction material, up to 1,500 TPD of source-separated green waste, up to 500 TPD of source-separated supermarket trim and cull, and up to 200 TPD of source-separated wood waste.¹ The revised Permit was also approved in 2014.

Athens Services is seeking approval for a revised Permit that would retain the existing daily limit of 6,700 TPD but would remove material-specific limits. The proposed change is a response to

¹ "Revised Final Environmental Impact Report: Sun Valley - La Tuna Canyon Community Plan Area—Community Recycling and Resource Recovery Facility." Community Recycling & Resource Recovery Inc. July 2014.

shifts in the facility's customer base, such as growth in the demand for green waste recycling and a reduction in municipal solid waste, and a demonstrated track record of compliance with the existing Permit. The revised Permit would not require any additional employees or physical changes to the existing development on the site.

Trip Generation

The Final Revised EIR estimated that the facility would generate up to 5,400 daily Passenger Car Equivalent (PCE) trips (2,700 trips in and 2,700 trips out) under a 6,700 TPD limit with 64% of the material arriving by heavy-duty trucks, and 36% of the material arriving by autos and light or medium-duty trucks.² Daily load data from the project site for September 2023 indicates that the project site receives an average of 1,609 TPD and receives 86% of loads on trucks carrying at least one ton of material.^{3,4} **Table 1** illustrates how the distribution of vehicles delivering material to the project site shifted towards larger commercial trucks over the last 10 years and that the facility operates well within the EIR's daily trip estimates.

Table 1: EIR Trip Estimates and Vehicle Mix Compared to Current Operations

Data Source	Tons per Day (TPD)	Vehicle Mix ¹		Total Daily Trips (PCE) ²
		Light and Medium Duty Vehicles (<1 ton loads)	Heavy duty trucks (1+ ton loads)	
<i>EIR (July 2014)</i>	6,700	36%	64%	5,400
<i>Current operations (September 2023)</i>	1,609	14%	86%	1,096

Notes:

¹ Vehicle mix is based on daily loads, which do not incorporate a PCE adjustment.

² Total daily trips (PCE) assumes a PCE factor of 2.0 for truck trips.

Source: Athens Services. "SEPT LOADS," September 2023.; Community Recycling & Resource Recovery Inc. "Revised Final Environmental Impact Report: Sun Valley - La Tuna Canyon Community Plan Area—Community Recycling and Resource Recovery Facility," July 2014.

Under the proposed change, the facility would no longer be bound by material-specific TPD limits but would retain the existing 6,700 TPD overall limit. **Table 2** summarizes how growth in TPD

² The EIR estimated net new peak hour trips using a PCE factor of 2.0 autos for each truck trip. The total daily trip generation estimates presented in the EIR thus represent PCE-adjusted trips with a PCE factor of 2.0 for truck trips.

³ Athens Services. "SEPT LOADS," September 2023.

⁴ One load is assumed to be equivalent to 2.0 non-PCE trips (one inbound trip and one outbound trip).

received at the facility and changes in the vehicle mix might impact daily trips, assuming that the average tons per load by vehicle type from September 2023 remains constant. Although the facility operator does not expect vehicle mix to return to the earlier mix of light and medium duty vehicles, the impact of changes to the vehicle mix on daily trips was nevertheless reviewed because a shift towards smaller vehicles without a decrease in TPD would translate into more daily trips.

Table 2: Total Daily Trip Estimates for Possible Future Scenarios

Scenario	Tons per Day (TPD)	Vehicle Mix ¹		Total Daily Trips (PCE) ²	Same or fewer trips than what was estimated for the approved project?
		Light and Medium Duty Vehicles (<1 ton loads)	Heavy duty trucks (1+ ton loads)		
Vehicle mix changes only					
A: Vehicle mix more closely reflects national average	1,609	20%	80%	1,133	Yes
B: Vehicle mix reverts to the breakdown estimated in the EIR	1,609	36%	64%	1,255	Yes
TPD changes only					
C: TPD reaches maximum allowable limit and current vehicle mix remains unchanged	6,700	14%	86%	4,565	Yes
Vehicle mix and TPD change					
D: TPD reaches maximum allowable limit & vehicle mix more closely reflects national average	6,700	20%	80%	4,715	Yes
E: TPD reaches maximum allowable limit & vehicle mix reverts to the breakdown estimated in the EIR	6,700	36%	64%	5,227	Yes
F: TPD reaches maximum allowable limit & vehicle mix shifts such that project site generates the daily trips estimated in the EIR	6,700	41%	59%	5,400	Yes

Notes:

¹ Vehicle mix is based on daily loads, which do not incorporate a PCE adjustment.

² Total daily trips (PCE) assumes a PCE factor of 2.0 for truck trips.

Source: Athens Services. "SEPT LOADS," September 2023.; Community Recycling & Resource Recovery Inc. "Revised Final Environmental Impact Report: Sun Valley - La Tuna Canyon Community Plan Area—Community Recycling and Resource Recovery Facility," July 2014.

This analysis demonstrates that, even if removing material-specific TPD limits results in an increase in TPD or an increase in the share of loads coming in from smaller vehicles, these changes would result in similar or fewer daily trips at the facility relative to the maximum daily trips for the approved project. This finding supports the conclusion that no new traffic impacts would occur under the revised Permit that were not disclosed in the previous CEQA documents.

VMT Screening Assessment

Site-generated VMT is comprised of inbound loads, outbound loads, and employee commute trips. The EIR states that waste delivered to the facility is primarily generated within a 20-mile radius. The proposed change will not alter the origin of incoming loads or outbound destinations, so it is reasonable to assume that trips to and from the project site under the new Permit will continue to occur within the existing service area. The EIR states that 165 employees worked at the facility across multiple weekday and weekend day shifts under baseline conditions and estimated that an additional 28 employees would be hired, which amounts to a total of 193 employees. As of March 2023, the project site employed 187 people.⁷ The facility operator does not expect to hire additional employees upon approval of the proposed change. Because the service area of the facility will be unchanged with the revised Permit and the total number of employees and maximum daily trips would not exceed what was estimated in the Revised Final EIR, it is concluded that the proposed Permit revision will not result in an increase in total site-generated VMT relative to the approved project in the entitlement documents.

Non-CEQA Transportation Analyses Screening Assessment

The City of Los Angeles Transportation Assessment Guidelines currently require non-CEQA transportation analysis for certain projects.⁸ These analyses relate to (1) pedestrian, bicycle, and transit access, (2) access, safety, and circulation, (3) project construction and (4) residential street cut-through traffic. The need for these analyses is subject to separate screening tests such as whether a project involves a discretionary action by the Los Angeles Department of City Planning, whether construction of over 50,000 square feet of new non-residential development would occur, whether a project would generate a net increase of over 250 daily trips, and whether the project would entail construction activities necessitating temporary closure of the adjacent street right-of-way. The answer to each of these screening criteria for the proposed Permit revision is “no” and therefore none of these analyses are required.

⁷ Crown Recycling Services. “Transfer/Processing Report,” March 2023.

⁸ City of Los Angeles Department of Transportation. “City of Los Angeles Transportation Assessment Guidelines,” August 2022.

Summary and Conclusion

The following presents a summary of the findings of this memorandum:

- The proposed revision to the operating Permit for the facility would remove the delineation of materials by type while retaining the existing limit of 6,700 TPD.
- The Final Revised EIR prepared in 2014 estimated that the facility would generate up to 5,400 daily Passenger Car Equivalent (PCE) trips under a 6,700 TPD limit with 64% of the material arriving by heavy-duty trucks, and 36% of the material arriving by autos and light or medium-duty trucks. Since 2014 changes in the market have resulted in more material arriving at the facility in heavy-duty trucks and less in medium and light-duty vehicles, increasing the average tonnage per load.
- A range of scenarios was developed and analyzed to show that the proposed Permit revision would not result in more vehicle trips per day than was estimated in the Final Revised EIR. Thus, it is concluded that no new traffic impacts would occur under the revised Permit that were not disclosed in the previous CEQA documents.
- A qualitative assessment of total site-generated vehicle miles of travel determined that operations under the proposed Permit revision would not result in an increase total site-generated VMT relative to the approved project in the entitlement documents.
- The requirements for non-CEQA transportation analysis in the City of Los Angeles Transportation Assessment Guidelines were reviewed and it was found that the proposed Permit revision would not trigger this analysis.