Addendum to the
Avenue 34 Project
Initial Study / Mitigated Negative Declaration

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SECTION 1
Introduction

1.1 OVERVIEW

On February 13, 2017, the City of Los Angeles adopted the Avenue 34 Initial Study / Mitigated Negative Declaration (ISMND), which analyzed the potential environmental impacts associated with demolition of an onsite buildings and construction and operation of a mixed-use multi-family residential and commercial building.

Subsequent to the adoption of the ISMND, a Removal Action Workplan (RAW) was prepared for the necessary removal of impacted soil from the site. Refer to Section 2 for detailed project description. Therefore, this Addendum is necessary to address the potential environmental effects of the removal action as it relates to the mixed-use project evaluated in the prior ISMND.

1.2 PURPOSE OF ADDENDUM

According to Section 15164 of the State California Environmental Quality Act (CEQA) Guidelines, an addendum to a previously certified environmental impact report (EIR) or adopted negative declaration shall be prepared by a lead or responsible agency if changes or additions to the document are necessary but none of the conditions described in Section 15162 requiring the preparation of a subsequent EIR or negative declaration are applicable. An addendum need not be circulated for public review but can be included in or attached to the final EIR or adopted negative declaration. The decision-making body considers the addendum with the final EIR or adopted negative declaration prior to making a decision on the project, as modified.

Section 15162 of the State CEQA Guidelines states that, for a project covered by a certified EIR or adopted negative declaration, preparation of a subsequent EIR or negative declaration is required if one or more of the following conditions occur:

1. Substantial changes are proposed in the project that 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 that 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.
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 that 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.

This Addendum will show that some changes or additions to the prior ISMND are necessary but none of the conditions requiring the preparation of a subsequent negative declaration are applicable.

1.3 SCOPE AND CONTENT OF ADDENDUM

This Addendum has been prepared in accordance with the requirements of CEQA (Public Resources Code Section 21000 et seq.) and the State CEQA Guidelines (Title 14 California Code of Regulations Section 15000 et seq.). This Addendum considers each of the environmental impacts that were analyzed in the prior ISMND and focuses on determining whether the modified project would result in an increase in the severity of the impacts identified in the prior ISMND or would result in any new impacts not previously considered in the prior ISMND. The criteria for determining the significance of environmental impacts in this addendum analysis are the same as those contained within the previous ISMND. The topic areas considered in the prior ISMND were as follows:

- Aesthetics
- Agricultural and Forestry Resources
- Air Quality
- Biological Resources
- Cultural Resources
- Geology and Soils
- Greenhouse Gas Emissions
- Hazardous and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Mineral Resources
- Noise
- Population and Housing
- Public Services
- Recreation
- Transportation/Traffic
- Tribal Cultural Resources
- Utilities and Service Systems
- Mandatory Findings of Significance

To comply with the current CEQA Guidelines, this Addendum provides analysis for two additional environmental topic areas not included in the prior ISMND, which include Energy Resources and Wildfires. In addition, this Addendum adds to the Transportation/Traffic section of the prior ISMND by providing a focused analysis of the excavation and haul activities potential to affect vehicle mile traveled (VMT).

SECTION 2
Project Background and Proposed Modification

2.1 PROJECT BACKGROUND

The project evaluated in the Avenue 34 Project Initial Study / Mitigated Negative Declaration (ISMND) consists of demolition of an 86,712 square-foot warehouse building, a 4,033 square-foot metal building, and portions of a 24,018 square-foot building and 3,521 square-foot building, to allow for the construction of a mixed-use development with 372 residential dwelling units and 40,000 square feet of commercial floor area. The project would provide onsite parking in a one level subterranean parking area and areas located at grade. The project also identified construction activities that include excavation, shoring, grading, foundation, haul route (for export of approximately 90,000 cubic yards (cy) of soil), and removal and replacement of street trees.

Site assessments conducted between 2019 and 2021 identified the presence of chemicals of concerns (COCs) at the site including tetrachloroethylene (PCE), trichloroethene (TCE), and total petroleum hydrocarbons (TPH) in soil gas and soil; lead, arsenic, and hexavalent chromium in isolated occurrences in soil; and generally low concentrations of PCE, TCE, TPH, and dichloroethane (cis,1,2-DCE) in groundwater. The presence of these contaminants may impact future onsite occupants and commercial workers. Therefore, the Avenue 34 Draft Removal Action Workplan (RAW) was prepared to identify measures to mitigate potential human exposure to COCs present in the subsurface.

Excavation and offsite disposal of impacted soils and construction and operation of a vapor extraction system (VES) were selected as the most appropriate removal action for the project site to mitigate potential human exposure to COCs at the site. Installation of engineering controls (vapor intrusion mitigation system (VIMS) and sub-slab membrane) are already part of the foundation design and are included as part of the building design.

The draft RAW, prepared by California Environmental and dated September 30, 2021, is entitled *Draft Site Characterization Report and Removal Action Workplan, Proposed Mixed-Use Redevelopment Project,* is incorporated by reference in this Addendum.

2.2 PROPOSED MODIFICATION TO THE PROJECT

The proposed modification to the project evaluated in this Addendum includes the excavation and offsite disposal of impacted soils and construction and operation of a VES described in the RAW. The RAW includes a detailed engineering plan for conducting the removal action, a description of the on-site contamination, and the goals to be achieved by the removal action.

Soil excavation involves removal of all COCs in soil within the upper 20 feet at the site that exceed the risk-based soil screening criteria. The total amount of soil excavated is estimated to be 24,756 cubic yards (cy). It is estimated that the removal of 37,134 tons of impacted soil would require approximately 1,388 truck trips to remove. The impacted soil will likely be classified as non-hazardous or California hazardous waste. After the disposal facility is determined, the soil will be loaded into end-dump trailers/trucks that will be covered with tarps prior to leaving the site for the disposal facility.

Post-excavation soil sampling will provide verification that the removal goals were met. The soil sample data will also be used to prepare a post excavation human health risk assessment (HHRA) to verify human health risk levels do not exceed applicable requirements.

A network of vapor extraction wells will be installed following the excavation work to remove residual volatile organic compounds (VOCs) in soil gas. The network design will be developed following the installation and pilot testing of an initial three-well system. The VES pilot test will run for between 1 and 3 months to determine the final well spacing for the VES extraction network. A series of multi-depth (between 5 and 25 feet) soil gas and pressure monitor probes will be placed around the periphery of the site to gauge the decay of soil gas concentrations over time and to measure the effective (intrinsic) permeability of the alluvial sediment. These monitor probes would also be used to assess the potential for offsite vapor migration.

A VIMS, consisting of a designed engineered membrane and vent system will be installed beneath all onsite structures. The major components of the VIMS include the following:

- Below slab perforated plastic pipe imbedded in a gravel/sand layer a minimum four inches thick connected to vertical vent risers;
- Membrane placed above the gravel layer consisting of a 60-mil thick ethyl vinyl alcohol (EVOH) sheeting designed to inhibit flow of VOCs;
- Membrane seams that are taped or sprayed sealed with liquid boot;
- Monitoring probes consisting of plastic sampling tubes above and below the membrane;
- Utility trench dams consisting of low permeability plugs in utility trenches at buildings;
- Conduit seals consisting of low-VOC caulk within dry utility conduits; and
- Provision for installation of active fans on vent risers.

Sub-slab probes will be monitored prior to building occupancy. If sub-slab VOC concentrations meet California screening levels in the passive vent mode then active venting is not required. If sub-slab VOC concentrations exceed screening levels in the passive mode, then fans would be activated. The overall cleanup activities are anticipated to last approximately one month.

SECTION 3
Environmental Review

3.1 INTRODUCTION

The proposed modification to the project involves the addition of a Removal Action Workplan (RAW), removal of impacted soil from the site, and installation and operation of a VES and VIMS.

The RAW involves a two-fold approach to address soil contaminated with PCE, TCE, TPH, and cis,1,2-DCE. Approximately 24,756 cubic yards of impacted soils will be excavated and disposed offsite during the site development process. Additionally, construction and operation of a VES and VIMS will serve to mitigate potential human exposure to soil vapor. This Addendum focuses on the potential effects of excavating and hauling the contaminated soil from the site and installation of the VES and VIMS.

Refer to Section 2 for detailed project description.

The prior ISMND was certified in February 2017. No substantial changes in circumstances have occurred since the prior ISMND was prepared and no new information of substantial importance has become available since the prior ISMND was prepared.

The following sections include a summary of each of the environmental impact topics evaluated in the prior ISMND, and a determination as to whether the modified project would result in an increase in the severity of the impacts identified in the prior ISMND, or any new impacts not previously considered in the prior ISMND.

3.2 ENVIRONMENTAL ANALYSIS

3.2.1 AESTHETICS

The prior ISMND indicated that the project would result in less-than-significant visual impacts because the Proposed Project is classified as a mixed-use residential project and is located on an infill site within a Transit Priority Area as defined by CEQA. Accordingly, the Project's aesthetic impacts shall not be considered significant impacts on the environment pursuant to Public Resources Code Section 21099, which prohibits aesthetic impacts from being considered significant environmental impacts pursuant to CEQA. The prior ISMND did not recommend any mitigation measures for aesthetic impacts.

The cleanup activities (i.e., contaminated soil excavation and haul, construction and operation of a VES and VIMS) will not have the potential to result in any long-term degradation of the site's visual character or quality. In addition, the proposed cleanup activities will not have the potential to create any new lighting impacts beyond what was evaluated in the prior ISMND or exacerbate the conditions that led to the initial determination. Based on the above, the proposed cleanup activities will not result in any additional significant adverse aesthetic impacts or a substantial increase in the severity of the impacts identified in the prior ISMND.

Conclusion: *The cleanup activities will not result in any additional significant adverse aesthetic impacts or a substantial increase in the severity of the impacts identified in the prior ISMND.*

3.2.2 AGRICULTURAL AND FORESTRY RESOURCES

As indicated in the prior ISMND, no impacts related to agricultural resources will occur as there are no existing agricultural or forestry resources on the site. The cleanup activities will occur in the same

footprint as the original project. Therefore, the cleanup activities will not result in any additional significant adverse impacts or a substantial increase in the severity of the impacts identified in the prior ISMND.

Conclusion: *The cleanup activities will not result in any additional significant adverse agricultural or forestry impacts or a substantial increase in the severity of the impacts identified in the prior ISMND.*

3.2.3 AIR QUALITY

As indicated in the prior ISMND, impacts related to air quality were found to be less than significant. The cleanup activities (i.e., contaminated soil excavation and haul, construction and operation of a VES and VIMS) will use diesel vehicles and equipment for the removal of contaminated soil similar in nature to that analyzed in the prior ISMND (e.g., rubber-tired dozer, tractors/loaders/backhoes, excavators, graders, and trenchers). In addition, cleanup activities will generate dust. The prior ISMND determined project-related air pollutant emissions from demolition and grading would comply with all applicable regulatory standards including Southern California Air Quality Management District (SCAQMD) Rule 403, fugitive dust. The cleanup activities will be required to reduce fugitive dust in compliance with SCAQMD Rule 403 through applying water in sufficient quantities to prevent the generation of visible dust plumes, applying soil binders to uncovered areas, reestablishing ground cover as quickly as possible, utilizing a wheel washing system to remove bulk material from tires and vehicle undercarriages before vehicles exit the Project Site, and maintaining effective cover over exposed areas.

The excavation of contaminated soil on the site would require additional construction activities. The prior ISMND analyzed the potential impacts of peak daily construction emissions onsite and determined that the air quality impacts would be less than significant by not exceeding any emission threshold. The potential impacts from additional excavation activities onsite are anticipated to increase approximately 26% (24,756 cy of contaminated soil divided by 98,000 cy soil excavated under proposed project). Based on this estimation, construction equipment used for excavation/grading activities would not cause any emission source (i.e., ROG, NO_x, CO, SO_2, PM_{10}, $PM_{2.5}$) to exceed a peak daily threshold. Therefore, the cleanup activities would not result in any additional significant adverse air quality impacts or a substantial increase in the severity of the impacts identified in the prior ISMND.

Conclusion: *The cleanup activities will not result in any additional significant adverse air quality impacts or a substantial increase in the severity of the impacts identified in the prior ISMND.*

3.2.4 BIOLOGICAL RESOURCES

The prior ISMND indicated that the project could result in direct and indirect effects on sensitive wildlife species during project construction. Specifically, determination was made that the project could result in potentially significant impacts related to the removal of 39 trees, which could provide nesting habitat for a variety of bird species that are afforded protection under the federal Migratory Bird Treaty Act (MBTA – 16 United States Code Sections 703-712). As a result, the project has the potential to impact migratory and other bird species if construction activities were to occur during the nesting season. Construction-related disturbances could result in nest abandonment or premature fledging of the young. Therefore, the ISMND recommended two mitigation measures (BIO-1 and BIO-2) that require planting replacement trees at a ratio of 1 to 1 and requiring project activities (including disturbances to native and non-native vegetation, structures, and substrates) to take place outside of the breeding bird season. Implementation of these mitigation measures were determined to reduce impacts

to nesting birds to a less-than-significant level by ensuring that any active bird nests on or adjacent to the site are not disturbed by project construction.

As such, the cleanup activities are also made subject to these measures and requirements. The cleanup activities involve ground disturbing activities comparable to ground disturbance associated with construction that was evaluated in the prior ISMND. With the implementation of adopted measures and regulatory requirements, the cleanup activities would not result in any additional significant adverse biological resource impacts or a substantial increase in the severity of the impacts identified in the prior ISMND.

Conclusion: *The cleanup activities will not result in any additional significant adverse biological resource impacts or a substantial increase in the severity of the impacts identified in the prior ISMND.*

3.2.5 CULTURAL RESOURCES

The prior ISMND indicated that project construction activities could result in significant impacts to unknown subsurface cultural or paleontological resources. However, compliance with City of Los Angeles regulatory compliance measures (RCMs) would reduce potential impacts to subsurface cultural or paleontological resources to a less-than-significant level by providing a process for evaluating and, as necessary, avoiding impacts to identified resources. As such, the cleanup activities are also made subject to these measures and requirements. The cleanup activities involve ground disturbing activities comparable to ground disturbance associated with construction that was evaluated in the prior ISMND. With implementation of adopted RCMs, the cleanup activities would not result in any additional significant adverse cultural resource impacts or a substantial increase in the severity of the impacts identified in the prior ISMND.

Conclusion: *The cleanup activities will not result in any additional significant adverse cultural resource impacts or a substantial increase in the severity of the impacts identified in the prior ISMND.*

3.2.6 ENERGY RESOURCES

The prior ISMND did not analyze potential impacts related to energy resources. The cleanup activities involve the use of energy during the soil excavation, transportation, and disposal processes. Given the short-term, temporary nature of this process, the additional energy consumed would be less than significant. The cleanup activities, therefore, would not have the potential to result in any significant adverse impacts related to energy.

Conclusion: *The potential impacts of the cleanup activities related to energy resources will be less than significant.*

3.2.7 GEOLOGY AND SOILS

The prior ISMND indicated that project construction activities could result in significant impacts to geology and soils. However, compliance with City of Los Angeles regulatory RCMs would reduce potential impacts related to soil erosion to a less-than-significant level by 1) requiring excavation and grading activities should be scheduled during dry weather periods and 2) requiring stockpiles, excavated, and exposed soil be covered with secured tarps, plastic sheeting, erosion control fabrics, or treated with a bio-degradable soil stabilizer. As such, the cleanup activities are also made subject to these measures and requirements. The cleanup activities involve ground disturbing activities comparable to ground disturbance associated with construction that was evaluated in the prior ISMND. With implementation of adopted measures and regulatory requirements, the cleanup activities would

not result in any additional significant adverse geology and soils impacts or a substantial increase in the severity of the impacts identified in the prior ISMND.

Conclusion: *The potential impacts of the cleanup activities related to geology and soils will remain less than significant.*

3.2.8 GREENHOUSE GAS EMISSIONS

As indicated in the prior ISMND, impacts related to greenhouse gas emissions were found to be less than significant. The modified project would use diesel vehicles and equipment during implementation of the removal action. GHG emissions for the entire construction of the project over the construction period plus the operation of the project were determined to be less than significant in the prior ISMND. The addition of short duration cleanup activities and 1,388 truck trips for soil removal (12% increase over construction truck trips identified in the ISMND) will not change this conclusion. Thus, the cleanup activities will not result in any additional significant adverse greenhouse gas emission impacts or a substantial increase in the severity of the impacts identified in the prior ISMND.

Conclusion: *The potential impacts of the cleanup activities related to greenhouse gas emissions will remain less than significant.*

3.2.9 HAZARDS AND HAZARDOUS MATERIALS

As indicated in the prior ISMND, implementation of the project could result in potentially significant impacts to hazards and hazardous materials. However, compliance with City of Los Angeles regulatory RCMs and mitigation measures (removal of asbestos containing materials and lean based paint) would reduce potential impacts to hazards and hazardous materials to a less-than-significant level. In addition, the ISMND identified the potential to expose students and staff of the identified schools to potentially hazardous materials, substances, or waste during the construction period.

Therefore, the ISMND recommended two mitigation measures (HAZ-2 and HAZ-3) that require the construction contractor to maintain communication with the local schools regarding construction activity schedules, to install traffic signs, prohibit staging or parking of construction vehicles adjacent to a school, and to schedule haul truck routes away from schools when school is in session. Implementation of these mitigation measures were determined to reduce impacts to schools from hazards to a less-than-significant level by ensuring construction activities do not endanger students.

The RAW activities involve the excavation, transportation, and disposal of soil contaminated with hazardous substances along with construction and operation of a VES and VIMS. The RAW proposes a soil removal action to prevent, minimize, stabilize, mitigate, or eliminate the release or threat of release of a hazardous waste substance at the site. All removal, transportation, and disposal will be performed in accordance with applicable federal, state, and local laws, regulations, and ordinances, and Best Management Practices (BMPs).

In addition, the cleanup activities are also made subject to the above-mentioned mitigation measures and requirements. The cleanup activities involve ground disturbing activities comparable to ground disturbance associated with construction that was evaluated in the prior ISMND. With the implementation of adopted measures and regulatory requirements, the excavation and haul activities would not result in any additional significant adverse hazardous materials impacts or a substantial increase in the severity of the impacts identified in the prior ISMND.

Conclusion: *The potential impacts of the cleanup activities related to hazards and hazardous materials will remain less than significant.*

3.2.10 HYDROLOGY AND WATER QUALITY

As indicated in the prior ISMND, implementation of the project would not result in any potentially significant impacts to hydrology and water quality with compliance with City of Los Angeles RCMs. As such, the cleanup activities are also made subject to RCMs and requirements. The cleanup activities, therefore, would not result in any changes to the conclusion of the prior ISMND that potential impacts related to hydrology and water quality would be less than significant.

Conclusion: *The cleanup activities will not result in any additional significant adverse impacts related to hydrology and water quality or a substantial increase in the severity of the impacts identified in the prior ISMND.*

3.2.11 LAND USE AND PLANNING

The prior ISMND concluded that the project would have less than significant impacts with respect to land use and public land use policies. The cleanup activities will occur in the same footprint as the original project and will makes no changes to the original project land use. As such, the cleanup activities will not result in any additional significant adverse impacts or increase in the severity of the impacts identified in the prior ISMND.

Conclusion: *The potential impacts of the cleanup activities related to land use and public land use policies will remain less than significant.*

3.2.12 MINERAL RESOURCES

As indicated in the prior ISMND, the project would not result in significant impact to mineral resources. The cleanup activities will occur in the same footprint as the original project and will, therefore, not result in any additional significant adverse impacts or increase in the severity of the impacts identified in the prior ISMND.

Conclusion: *The potential impacts of the cleanup activities related to mineral resources will remain at no impact.*

3.2.13 NOISE

As indicated in the prior ISMND, implementation of the project would potentially result in significant levels of noise exposure related to construction, groundborne vibration, and traffic noise. Mitigation measures were adopted that will reduce each of these impacts to a less-than-significant level. The excavation and haul activities will involve noise generating activities that will be substantially the same as project construction activities. Such activities were determined by the prior ISMND to be less than significant with the implementation of adopted mitigation measures. The mitigation measures would apply to the excavation and haul activities and will, therefore, not result in any additional significant adverse noise impacts or a substantial increase in the severity of the impacts identified in the prior ISMND.

Conclusion: *The cleanup activities will not result in any additional significant adverse noise impacts or a substantial increase in the severity of the impacts identified in the prior ISMND.*

3.2.14 POPULATION AND HOUSING

The prior ISMND concluded that the project would have less than significant impacts with respect to population and housing. The cleanup activities will not displace housing nor induce growth and,

therefore, will not result in any additional significant adverse impacts or increase in the severity of the impacts identified in the prior ISMND.

Conclusion: *The potential impacts of the cleanup activities related to population and housing will remain less than significant.*

3.2.15 PUBLIC SERVICES

As stated in the prior ISMND, impact to public services was determined to be less than significant with the exception of police protection. A mitigation measure was adopted to require the project to incorporate the design guidelines relative to security in semi-public and private spaces. The cleanup activities will not increase the demand for public services as compared to the prior project. Therefore, the cleanup activities will not result in any additional significant adverse impacts or increase in the severity of the impacts identified in the prior ISMND.

Conclusion: *The potential impacts of the cleanup activities related to public services would remain less than significant.*

3.2.16 RECREATION

As indicated in the prior ISMND, the project would not result in significant impact to recreation. The cleanup activities will not result in any additional significant adverse impacts or increase in the severity of the impacts identified in the prior ISMND.

Conclusion: *The potential impacts of the cleanup activities related to recreation would remain less than significant.*

3.2.17 TRANSPORTATION

The prior ISMND indicated that the project would result in potentially significant impacts related to construction generated truck trips. The prior ISMND identified project would require approximately 12,250 one-way haul truck trips to export approximately 98,000 cubic yards (CY) of excavated soil material. The ISMND concluded the addition of construction truck vehicles onto the local street system would contribute to increased traffic in the Project vicinity. However, the Proposed Project's construction trip traffic would be a fraction of the operational traffic that would not cause any significant impacts at studied intersections and is not anticipated that they would contribute to a significant increase in the overall congestion in the Project vicinity. In addition, any truck trips would be limited to the length of time required for the Project's construction. The ISMND recommended mitigation measures to ensure potential construction traffic impacts remain at a less-than-significant level which include implementing a Traffic Control Plan, installing appropriate traffic signs, and maintaining safe pedestrian access on adjacent sidewalks.

The excavation and haul activities will result in approximately 1,388 truckloads of soil for off-site disposal which would account for an approximate 12% increase in truck trips. However, these additional truck trips are not considered significant in relation to the overall project-related truck trips and the mitigation measures would also apply to the excavation and haul activities. Therefore, the excavation and haul activities will not result in any additional significant adverse traffic impacts or a substantial increase in the severity of the impacts identified in the prior ISMND.

Senate Bill 743 and Vehicle Miles Traveled

Senate Bill (SB) 743 was signed by Governor Brown in 2013 and required the Governor's Office of Planning and Research (OPR) to amend the CEQA Guidelines to provide an alternative to level of service (LOS) for evaluating Transportation impacts. SB 743 specified that the new criteria should promote the reduction of greenhouse gas emissions, promote the development of multimodal transportation networks, and promote a diversity of land uses. The bill also specified that delay-based LOS could no longer be considered an indicator of a significant impact on the environment. In response, Section 15064.3 was added to the CEQA Guidelines beginning January 1, 2019. Section 15064.3(c) states that the provisions of the section shall apply statewide beginning on July 1, 2020.

CEQA Guidelines Section 15064.3, Determining the Significance of Transportation Impacts, states that vehicle miles traveled (VMT) is the most appropriate measure of transportation impacts and provides lead agencies with the discretion to choose the most appropriate methodology and thresholds for evaluating VMT. The OPR guidelines allow lead agencies to adopt their own thresholds of significance that are supported by substantial evidence (CEQA Guidelines Section 15064.7(c)).

In its simplest form, VMT is calculated by multiplying the daily trip generation of a project by the average trip length. The planned residences and businesses as part of the project will generate long-term trips that are considered part of VMT. Even though the excavation and haul activities will create traffic trips, these temporary trips will only occur during construction activities. Therefore, the excavation and haul activities will not affect the long-term VMT of the project.

Conclusion: *The excavation and haul activities will not result in any additional significant adverse traffic impacts or a substantial increase in the severity of the impacts identified in the prior ISMND.*

3.2.18 TRIBAL CULTURAL RESOURCES

The prior ISMND indicated that project construction activities would not result in significant impacts to subsurface tribal cultural resources. The cleanup activities involve ground disturbing activities comparable to ground disturbance associated with construction that was evaluated in the prior ISMND. In addition, Pursuant to AB 52, the City of Los Angeles sent pre-consultation request letters on May 25, 2016, to the recognized Native American Tribal Representatives within the Los Angeles region. The City of Los Angeles did not receive any responses. Therefore, the excavation and haul activities will not result in any additional significant adverse tribal cultural resource impacts or a substantial increase in the severity of the impacts identified in the prior ISMND.

Conclusion: *The cleanup activities will not result in any additional significant adverse tribal cultural resource impacts or a substantial increase in the severity of the impacts identified in the prior ISMND.*

3.2.19 UTILITIES AND SERVICE SYSTEMS

The prior ISMND indicated that the project would have no significant utilities and services impacts. The cleanup activities will result in a minor increase in the demand for solid waste disposal at the designated sites listed in the RAW. Contaminated soil disposal will be performed in accordance with applicable federal, state, and local laws, regulations, and ordinances, and Best Management Practices (BMPs). The excavation and haul activities, therefore, will not result in any changes to the conclusion of the prior ISMND that potential impacts related to utilities and services will remain less than significant.

Conclusion: *The potential impacts of the cleanup activities related to utilities and services will remain less than significant.*

3.2.20 WILDFIRE

The prior ISMND, did not analyze potential impacts to wildfires as a result of implementing the project. The project site is located in an urban environment and would not have the potential to result in any impacts to wildfire. The cleanup activities will not result in any additional significant adverse impacts or increase in the severity of impacts to wildfire.

Conclusion: *The cleanup activities will not result in any impacts related to wildfires.*

3.2.21 MANDATORY FINDINGS OF SIGNIFICANCE

The prior ISMND found that the one mandatory finding of significance items related to cumulatively considerable impacts were found to be less than significant with mitigation. As indicated by the prior analysis in Section 3 of this Addendum, the cleanup activities will not result in any additional significant impacts or substantially increase the severity of the impacts identified in the prior ISMND. Furthermore, the findings determined that impacts related to adverse effects on human beings and biological resources and cultural resources associated with the project were found to be less than significant. The foregoing analysis in each of the subject areas in this Addendum indicates that neither of these impacts will be substantially increased due to the cleanup activities.

Conclusion: *The cleanup activities will not result in any additional significant adverse impacts specified in the Mandatory Findings of Significance or a substantial increase in the severity of the impacts identified in the prior ISMND.*

3.3 CONCLUSION

Based on the forgoing analysis, DTSC has determined that the potential environmental impacts associated with cleanup activities have been analyzed and addressed in the previously prepared ISMND and this Addendum and would not result in conditions outlined in State CEQA Guidelines Section 15162 that would require preparation of a subsequent Mitigated Negative Declaration.