Addendum to the
Washington Boulevard / Los Angeles Street Mixed-use Project
Initial Study / Mitigated Negative Declaration

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Table of Contents

SECTION 1
Introduction

1.1 OVERVIEW

On November 19, 2018, the City of Los Angeles adopted the Washington Boulevard / Los Angeles Street Mixed-use Project Initial Study / Mitigated Negative Declaration (ISMND), which analyzed the potential environmental impacts associated with 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 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 the California Environmental Quality Act (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 Washington Boulevard / Los Angeles Street Mixed-use Project Initial Study / Mitigated Negative Declaration (ISMND) consists of demolition of an existing automotive repair facility, three large vacant industrial buildings/warehouses, and an apartment building for construction of a mixed-use multi-family residential and commercial building. The mixed-use multi-family residential and commercial building would be constructed at the southeast corner of the Washington Boulevard and Los Angeles Street intersection (project site) in the City of Los Angeles.

The mixed-use building would include 112 residential units, a courtyard, a gym, business center, community room, office space, and a lobby/leasing area, as well as commercial space (7,300 square feet (sf)). The proposed project would provide 16,493 sf of open space consisting of a centralized courtyard, individual balconies, and a community room. Lastly, the project would include a subterranean parking garage with a total of 75 vehicle parking spaces.

Site assessments conducted between 2016 and 2019 identified the presence of lead in soil at the project site at concentrations above screening levels for commercial and industrial soils. In addition, volatile organic compounds (VOCs) have been identified in soil vapor underlying the project site in concentrations above California Department of Toxic Substances Control (DTSC) human health screening levels. The presence of these contaminants may impact future onsite occupants, existing offsite residents, and commercial workers. Therefore, the 200 East Washington Boulevard Draft Removal Action Workplan (RAW) was prepared to identify measures to mitigate potential human exposure to lead and VOCs present in the subsurface.

A Revised Supplemental Site Investigation prepared in 2020 indicated that lead impacts are likely isolated to a small area within the footprint of the former automotive repair shop. Based on the results of previous soil vapor investigations, the highest concentrations of VOCs (principally tetrachloroethene [PCE]) were detected within the northern corner of the former automotive repair shop along East Washington Boulevard.

Excavation and offsite disposal of lead-impacted soils and engineering controls including installation of a subterranean parking garage with a ventilation system were selected as the most appropriate removal action for the project site to mitigate potential human exposure to PCE from vapor intrusion.

The draft RAW, prepared by Rincon Consultants and dated July 2, 2020, is entitled *Draft Removal Action Workplan, 200 East Washington Boulevard, Los Angeles, California,* 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 lead-impacted soils 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. It should be noted that the prior ISMND analyzed the potential environmental impacts associated with installation of a subterranean parking garage with a ventilation system as part of the overall mixed-use project.

The recommended removal action remedy combines excavation with off-site disposal of the impacted soil. The excavation and haul activities that would be conducted to implement the removal action include:

- Excavating approximately 70 cubic yards of impacted soil from identified locations, and
- Loading and transporting approximately 30 tons of impacted soil to an appropriate disposal facility.

It is estimated that the removal of 30 tons of impacted soil would require approximately 2 truck trips to remove. Lead 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.

SECTION 3
Environmental Review

3.1 INTRODUCTION

The proposed modification to the project involves the addition of a Removal Action Workplan (RAW) and the removal of impacted soil from the site. The RAW involves a two-fold approach to address soil contaminated with lead, tetrachloroethylene (PCE), and trichloroethylene (TCE). Approximately 70 cubic yards of lead impacted soils will be excavated and disposed offsite during the site development process. Additionally, construction of a subterranean parking garage will serve as a barrier to mitigate potential human exposure to soil vapor from PCE and TCE. A ventilation system will also be installed in the parking garage to further mitigate soil vapor impacts. This Addendum focuses on the potential effects of excavating and hauling the lead contaminated soil from the site. Construction of the subterranean parking garage and ventilation system were analyzed in the prior ISMND.

Refer to Section 2 for detailed project description.

The prior ISMND was certified in November 2018 and is attached as Appendix A to this Addendum. 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 visual impacts on adjacent properties. The project would result in a less-than-significant impact related to degrading the existing visual character or quality of the site and its surroundings and creating a new source of light or glare that could potentially adversely affect day or nighttime views. The prior ISMND did not recommend any mitigation measures for aesthetic impacts.

The excavation and haul will not have the potential to result in any long-term degradation of the site's visual character or quality. In addition, the proposed excavation and haul 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 excavation and haul would 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 excavation and haul 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 excavation and haul will occur in the same footprint as the original project. Therefore, the excavation and haul 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 excavation and haul 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.*

3.2.3 AIR QUALITY

As indicated in the prior ISMND, impacts related to air quality were found to be less than significant with mitigation. The excavation and haul activities would 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, excavation and haul activities would 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 excavation and haul activities will be required to reduce fugitive dust in compliance with SCAQMD Rule 403 through minimization of disturbance, soil treatment, soil stabilization, no grading during high winds, and street sweeping. The RAW includes a Dust Control Plan which identifies actions that would be taken during excavation and haul activities and allow the project to meet the requirements of SCAQMD Rule 403.

The removal of lead contaminated soil on the site would require 2 truck trips and these trips would involve traveling to off-site non-hazardous waste disposal facility. The prior ISMND analyzed the potential impacts of 534 one-way truck trips to export and import soil and determined that the air quality impacts would be less than significant. Therefore, the potential impacts from RAW excavation activities requiring 2 truck trips would also be less than significant. The excavation and haul 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 excavation and haul 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 five 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, which is typically February 15th through September 15th. Construction-related disturbances could result in nest abandonment or premature fledging of the young. However, compliance with City of Los Angeles regulatory compliance measures (RCMs) and with MBTA and California Fish and Game Code requirements would 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 excavation and haul activities are also made subject to these measures and requirements. The excavation and haul 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 biological resource impacts or a substantial increase in the severity of the impacts identified in the prior ISMND.

Conclusion: *The excavation and haul 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 subsurface cultural or paleontological resources. However, compliance with City of Los Angeles regulatory 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 excavation and haul activities are also made subject to these measures and requirements. The excavation and haul 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 excavation and haul 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 excavation and haul 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 excavation and haul activities involve the use of energy during the soil excavation, transportation, and disposal processes. Given the short duration of this process and the limited number of truck trips involved (2 total truck trips), the additional energy consumed would be less than significant. The excavation and haul activities, therefore, would not have the potential to result in any significant adverse impacts related to energy.

Conclusion: *The potential impacts of the excavation and haul 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 to geology and soils to a less-than-significant level by requiring preparation of and compliance with a geotechnical investigation. As such, the excavation and haul activities are also made subject to these measures and requirements. The excavation and haul 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 excavation and haul 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. In addition, the RAW includes Best Management Practices for erosion control. The excavation and haul activities would 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 excavation and haul 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 excavation activities and 2 truck trips for removal will not change this conclusion. Thus, the excavation and haul 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 excavation and haul 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 (installation of soil vapor, implementation of Soil Management Plan) would reduce potential impacts to hazards and hazardous materials to a less-than-significant level. As such, the excavation and haul activities are also made subject to these measures and requirements.

The RAW activities involve the excavation, transportation, and disposal of soil contaminated with hazardous substances. 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). Therefore, 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 excavation and haul 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 could result in potentially significant impacts to hydrology and water quality. However, compliance with City of Los Angeles regulatory RCMs and a mitigation measure (site drainage) would reduce potential impacts to hydrology and water quality to a less-than-significant level. As such, the excavation and haul activities are also made subject to this measure and requirements.

The RAW provides for the implementation of BMPs to reduce or eliminate sediment and other pollutants from entering existing storm water drains located in adjoining street drainage systems. The excavation and haul 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 with mitigation.

Conclusion: *The excavation and haul 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 excavation and haul 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 excavation and haul 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 excavation and haul 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 excavation and haul 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 excavation and haul 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 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 excavation and haul 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 excavation and haul 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 excavation and haul 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 excavation and haul activities will not increase the demand for public services as compared to the prior project. Therefore, the excavation and haul 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 excavation and haul 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 excavation and haul 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 excavation and haul 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 requiring temporary closure of sidewalks along Washington Boulevard and Los Angeles Street, which could increase traffic hazards due to pedestrians attempting to cross major roadways between intersections or walking on the side of the roadways to avoid construction. A mitigation measure (TRA-1) was adopted which requires the project owner to 1) plan construction and construction staging as to maintain pedestrian access on adjacent sidewalks, 2) provide temporary pedestrian facilities should be adjacent to the project site, 3) provide covered walkways, and 4) keep sidewalk open during construction until only when it is absolutely required to close or block sidewalk for construction staging. The excavation and haul activities will be subject to these same requirements.

The prior ISMND identified project would require approximately 534 one-way haul truck trips to export approximately 2,000 cubic yards (CY) of contaminated soil material and to import approximately 6,000 CY of clean soil material. The excavation and haul activities will result in approximately 2 truckloads of soil for off-site disposal. Given the limited number and duration of the truck trips, the removal action would account for a less than 1% increase in truck trips (2 trips divided by 534 trips equals 0.3%) and are not considered significant in relation to the overall project-related truck trips. 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 excavation and haul activities involve ground disturbing activities comparable to ground disturbance associated with construction that was evaluated in the prior ISMND. 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 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.*

3.2.19 UTILITIES AND SERVICE SYSTEMS

The prior ISMND indicated that the project would have no significant utilities and services impacts. The excavation and haul 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 excavation and haul 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 excavation and haul activities will not result in any additional significant adverse impacts or increase in the severity of impacts to wildfire.

Conclusion: *The excavation and haul 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 excavation and haul 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 excavation and haul activities.

Conclusion: *The excavation and haul 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 excavation and haul 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.