COUNTY CLERK'S USE

CITY OF LOS ANGELES
DEPARTMENT OF PUBLIC WORKS
BUREAU OF ENGINEERING
1149 S. BROADWAY, 7th FLOOR
LOS ANGELES, CALIFORNIA 90015
CALIFORNIA ENVIRONMENTAL QUALITY ACT
NOTICE OF EXEMPTION

(Articles II and III – City CEQA Guidelines)

Submission of this form is optional. The form shall be filed with the County Clerk, 12400 E. Imperial Highway, Norwalk, California, 90650 and with the State Clearinghouse in the Office of Planning and Research, if filed with the County Clerk, pursuant to Public Resources Code Section 21152(b). Pursuant to Public Resources Code Section 21167(d), the filing of this notice starts a 35-day statute of limitations on court challenges to the approval of the project.

LEAD CITY AGENCY AND ADDRESS:	**COUNCIL DISTRICT**
City of Los Angeles c/o Bureau of Engineering 1149 S. Broadway, 6th Floor, MS 939 Los Angeles, CA 90015	08
PROJECT TITLE: Compton Creek Low Flow Diversion Project (Project) (W.O. S33WCLFD / CIP No. WPD000022)	**LOG REFERENCE**

PROJECT LOCATION: Main Street in between 107th Street and 108th Street, in the Southeast Los Angeles Community Plan Area of the City of Los Angeles. See *Figure 1: Project Vicinity and Figure 2: Project Location*. T.G. Page 704, Grid C5

DESCRIPTION OF NATURE, PURPOSE, AND BENEFICIARIES OF PROJECT: The proposed project would install a diversion structure that would divert storm drain flows from priority outfall LACC-155 (Reinforced Concrete Box [RCB] Junction of Los Angeles County Flood Control District [LACFCD] No. 635 and LABOE No. 19034) and outfall LACC-154 (California Department of Transportation 51 inch Reinforced Concrete Pipe [RCP]) to the sanitary sewer system during dry weather. Without the projects the flow would otherwise discharge to Compton Creek in the City of Los Angeles. Project beneficiaries include community and stakeholder members, such as the Clean Rivers through Effective Stakeholders Total Maximum Daily Loads (TMDLs) (CREST) and the Upper Los Angeles River Enhanced Watershed Management Program, as the proposed project will improve water quality of Compton Creek and the Los Angeles River downstream from the diversion structure improving beneficial uses of the receiving water bodies. Please see the project description continuation in the narrative for more details.

On October 9, 2024, the Bureaus of Engineering (BOE) submitted the Project's 90% design plans for review. Once approved, BOE is moving the Project forward to the bid and award phase for a construction start anticipated in August 2025.

CONTACT PERSON	**CONTACT INFORMATION**
Cristian Centeno	cristian.centeno@lacity.org

EXEMPT STATUS:

CITY CEQA GUIDELINES	CATEGORICAL EXEMPTION*	Art. III, Sec. 1, Class 1, Cat. (2) and (3) Art III, Sec. 1, Class 2, Cat. (3)
STATE CEQA GUIDELINES	CATEGORICAL EXEMPTION*	Sec. 15301 (b) and (c) Sec. 15302 (c)

JUSTIFICATION FOR PROJECT EXEMPTION: This project is exempt from CEQA pursuant to State CEQA Guidelines Article 19, Section 15301 (b) and (c) and Section 15302 (c). Additionally, the project is exempt pursuant to Los Angeles CEQA Guidelines Article III, Section 1, Class 1, *Existing Facilities,* Categories (2) and (3), and Class 2, *Replacement and Reconstruction*, Category (3).
None of the limitations set forth in State CEQA Guidelines 15300.2 apply (see attached narrative).

IF FILED BY APPLICANT, ATTACH CERTIFIED DOCUMENT OF EXEMPTION FINDING

SIGNATURE:	TITLE:	DATE:
For Jan Green Rebstock	Environmental Affairs Officer Clean Water Division	Dec 26, 2024

FEE: $75.00	RECEIPT NO.	REC'D BY	DATE
	box 3000 4R5RZ274-18K232LP		

DISTRIBUTION: (1) COUNTY CLERK, (2) STATE CLEARINGHOUSE, (3) AGENCY RECORD

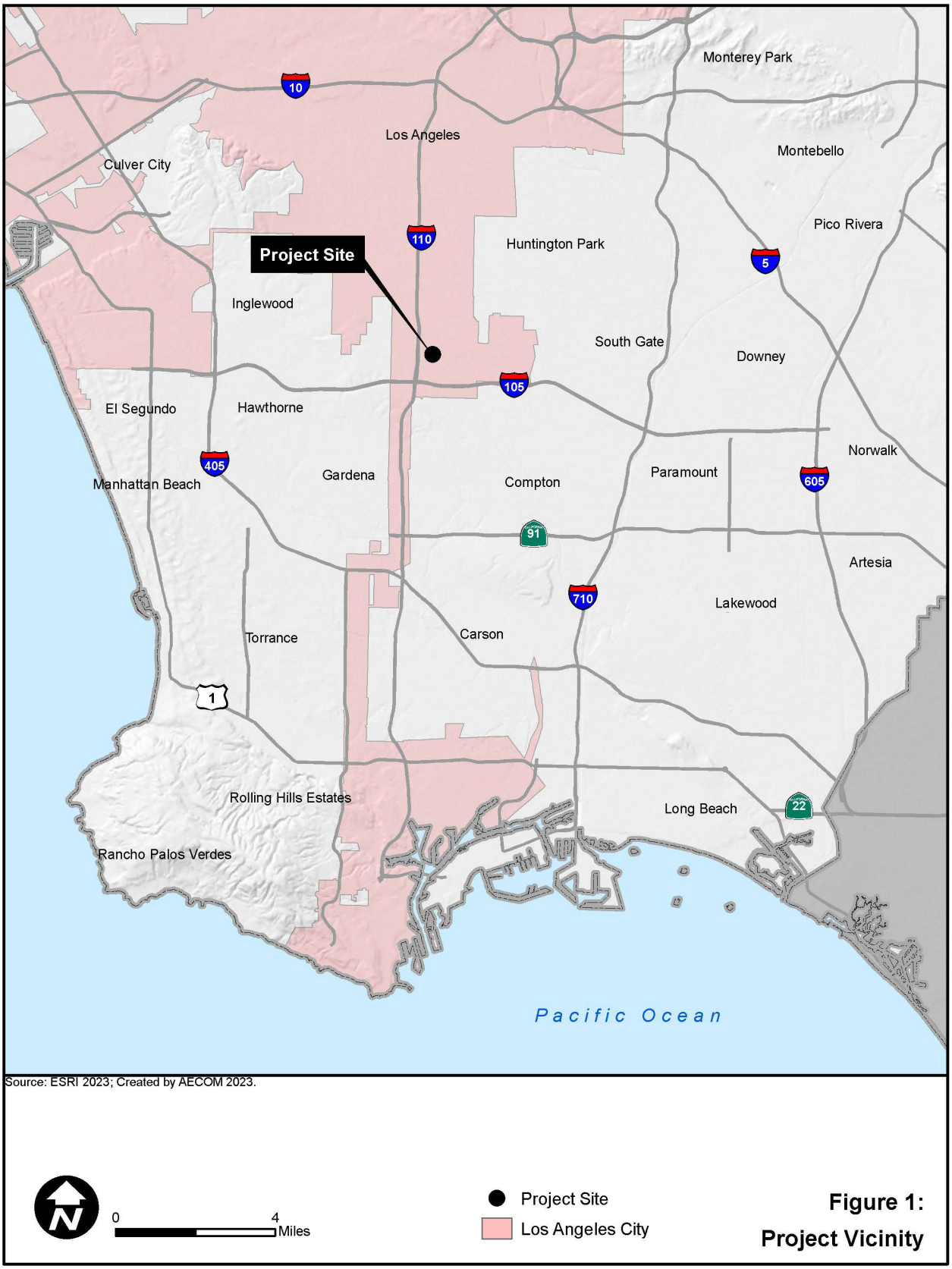


Figure 1: Project Vicinity

Figure 2: Project Location Map

CATEGORICAL EXEMPTION NARRATIVE

I. DESCRIPTION OF NATURE, PURPOSE, AND BENEFICIARIES OF PROJECT, CONTINUED

The proposed project would construct the proposed LFD along the Main Street northbound parking lane and adjacent property (LACFCD right-of-way [ROW]) to the east (immediately surrounding Compton Creek to the north, west, and south). Specifically, the proposed project would include the construction of a diversion structure at the Compton Creek outfalls LACC-154 (51-inch RCP) and LACC-155 (RCB junction). The proposed diversion structure would begin at the 51-inch RCP with a new drop junction structure. A new 18-inch pipe would connect the new junction structure to a portion of the existing RCB junction that would be reconstructed to include a diversion ditch perpendicular to the normal direction of flow. The diversion ditch would have a 2 percent minimum slope and have windows through the existing walls with a minimum 18-inch clearance to convey sediment and larger floating litter. A new 18-inch pipe would connect the diversion ditch to a new pretreatment structure (including trash collection and isolation valve) via gravity flow north through to the new pump well and LFD vaults (i.e., discharge and meter vaults). A new 3-inch force main would also be constructed south to pass over the existing RCBs and discharge into the existing sewer at the location of an existing lamp hole which would be replaced with a maintenance hole south of Compton Creek. In addition, a new gas detection vault would be located under the sidewalk to avoid existing utilities while leaving additional space for the LFD vaults prior to encroaching on the crosswalk. Other components of the proposed project would include Supervisory Control and Data Acquisition (SCADA) system as well as electrical and instrumentation control panels. See *Figure 3: Compton Creek Low Flow Diversion Conceptual Design.*

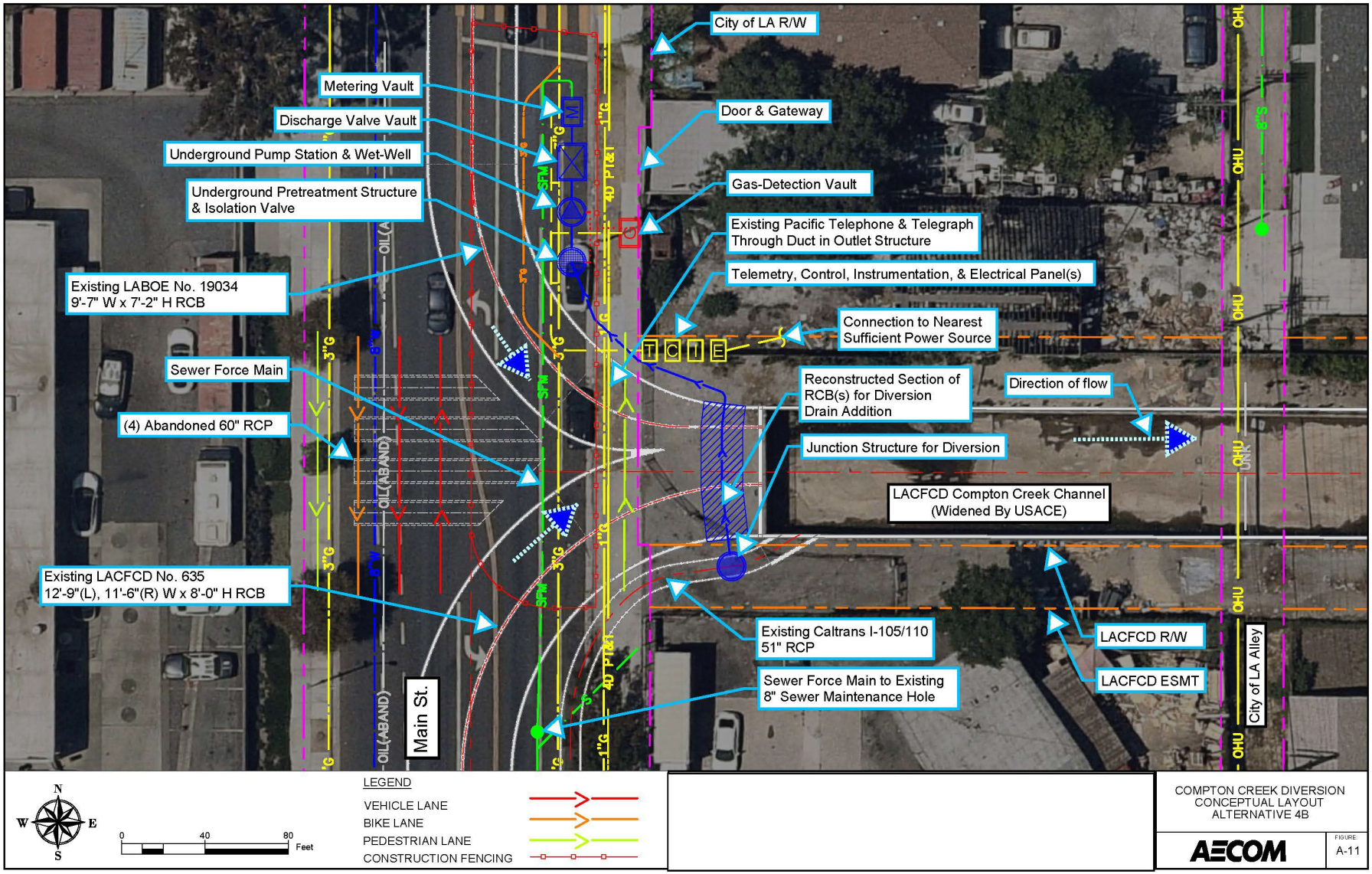
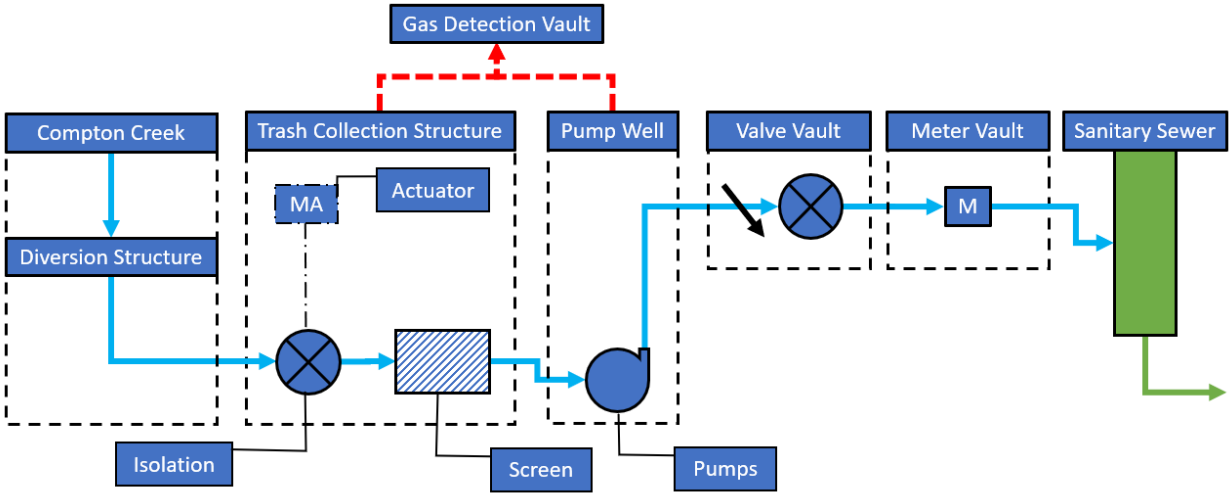


Figure 3: Compton Creek Low Flow Diversion Conceptual Design

A flowchart of the of the overall proposed LFD process is presented below. As shown in the flowchart, low flows are diverted from Compton Creek into a trash collection structure with isolation valve and trash screen. Screened flows are pumped up to a discharge valve vault through a force main. These screened flows continue through a meter vault to be discharged into a sanitary sewer maintenance hole where they enter the regional sanitary collection sewer system.



Compton Creek Low Flow Diversion Flowchart

The proposed LFD would be designed to operate autonomously during normal dry-weather operation. All pump controls, status, and instrumentation readings would be transmitted remotely to the LABOE SCADA system, which would then be received by the Venice Pumping Station. Two pumps would cycle on and off automatically based on pump well water level detected to discharge to the sanitary sewer. Pumps would operate on a duty/standby basis with capability to run the pumps on an alternating basis, or on a priority basis. To prevent incurring additional sewer fees or exceeding sewer collection system capacity, continuous operation of both pumps should be avoided. Pumps would automatically shut off at a specified high-high water level indicating a storm event or there is a fault in the system such as gas detection. Pumps would need to be manually or remotely restarted after the storm event has passed. Alternatively, LASAN may consider an automatic-restart capability after rain events such as restarting the pumps after a time delay. Influent isolation valve would be provided with a motorized actuator that can be remote controlled.

Regarding maintenance, the proposed LFD would be inspected on a monthly basis and whenever a fault or alarm is detected in the SCADA system. Maintenance of the trash collection structure would be performed on a quarterly basis, before and after storm events, or as required once constructed and trash loading can be more accurately determined. Maintenance of the proposed LFD can only be conducted if the parking lane is clear on Main Street. The curb along the proposed LFD would be redesignated as a no parking zone for ease of maintenance. This redesignation would lead to permanent loss of parking.

Construction Schedule and Procedures

The estimated duration of project construction is 21 months, starting in August 2025. The project work areas would occur on Main Street and adjacent LABOE ROW and LACFCD ROW to the east (immediately surrounding Compton Creek to the north, west, and south). After establishing a fenced

construction area with traffic control and stream diversion measures, demolition of interfering facilities would commence. The LFD and diversion structure would be constructed concurrently. Portions of the existing 51-inch RCP and RCB junction would require continuous stream diversion during diversion structure construction to safely pass dry weather and wet weather flows. Upon completion of all underground structures and equipment startup, testing would commence in conjunction with disturbed facility replacement such as sidewalk, pavement, fencing and lane striping.

Construction equipment expected to be used would include the following: excavators, backhoes, skid steer loaders, bobcats, concrete breakers or saws, dewatering pumps and/or diversion berms with piping, potholing truck, shoring equipment (e.g., trench boxes, sheet piles, or shoring piles), asphalt pavers or concrete pavers, vibratory compactors or rollers, concrete mixers, concrete grinders, concrete finishing tools, concrete curing equipment, line striping machines, silt fences or erosion control blankets, and safety equipment (e.g., fencing, warning signs, or barriers). A construction staging/laydown area would be provided on City-owned property (ROW and alley) along 108th Street (approximately 100 feet east of the project work area). It is expected that most of the equipment would be mobilized to the project site at the start of construction and would remain on site for most of the project duration, which would minimize daily travel to and from the site. No staging or equipment storage would occur within Compton Creek. The only activities that would occur within Compton Creek would be temporary construction access within the box channel, and placement of a temporary diversion within the box channel (e.g., temporary sandbag barrier) approximately 50 to 100 feet downstream from the RCB and RCP.

It is anticipated that haul trucks would travel to the project site using Interstate 110 Freeway (north or south), then travel east on Century Boulevard to Main Street. An estimated 258 total haul truck trips are anticipated. The estimated total excavation would be 847 cubic yards, with a maximum depth of 20 feet for the proposed LFD excavation.

Construction activities would occur Monday through Friday between 7:00 a.m. and 4:00 p.m. Approximately 3 to 10 construction workers would be expected to be onsite daily during construction hours. The proposed project would require temporary closure of the east sidewalk, southbound dedicated turn lane on Main Street, and northbound bicycle lane during construction. A traffic control plan would be implemented during construction. Additionally, one mainline utility (i.e., Southern California Gas line) would need to be relocated.

An appropriate combination of monitoring and resource avoidance would be employed during all construction activities, including implementation of the following Best Management Practices (BMPs):

- **BMP-1**: Construction of the proposed project is anticipated to occur every day of the week from 7:00 a.m. to 4:00 p.m. Should construction be required outside of the anticipated hours, construction activity will comply with the allowable hours of construction as dictated in the *Los Angeles Municipal Code Section 41.40*, including 7:00 a.m. to 9:00 p.m. Monday through Friday, 8:00 a.m. to 6:00 p.m. on Saturday, and no construction activity on Sundays or City holidays.

- **BMP-2**: The proposed project will implement Rule 403 fugitive dust control measures required by the South Coast Air Quality Management District (SCAQMD), which requires reasonable precautions to be taken to prevent visible particulate matter from being airborne, under normal wind conditions, beyond the property from which the emission originates. Reasonable precautions include, but are not limited to, the following:

    - Application of water on dirt roads, material stockpiles, and other surfaces that can give

rise to airborne dusts; and

- Maintenance of roadways in a clean condition

- **BMP-3**: The proposed project will implement erosion control where necessary that may include, but would not be limited to, the following:
  - Minimizing the extent of disturbed areas and duration of exposure;
  - Stabilizing and protecting disturbed areas;
  - Keeping runoff velocities low;
  - Retaining sediment within the construction area;
  - Use of silt fences or straw wattles;
  - Temporary soil stabilization;
  - Temporary drainage inlet protection;
  - Temporary water diversion around the immediate work area; and
  - Minimizing debris from construction vehicles on roads providing construction access
- **BMP-4**: The proposed project will implement Rule 402 measures required by the SCAQMD, which prohibits the discharge from any source whatsoever, such quantities of air contaminants or other materials that cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public or which endanger the comfort, repose, health, or safety of any such persons or the public or that cause or have a natural tendency to cause injury or damage to business or property.
- **BMP-5**: LABOE will require that all construction crews have fire-suppression equipment (such as fire extinguishers) on site to respond to the accidental ignition of a fire.
- **BMP-6**: Spill kits will be available onsite for potential leaks or spills of hazardous materials.
- **BMP-7**: LABOE or its contractor will reduce short-term construction noise through: (1) proper maintenance and tuning of all construction equipment engines to minimize noise emissions; and (2) proper maintenance and functioning of the mufflers on all internal combustion and equipment engines.
- **BMP-8**: To reduce predicted project construction noise levels to below City Code limits, LABOE or its contractor will install temporary construction noise barriers on the north side of Compton Creek, as shown in Figure 4. Temporary noise barriers shall meet the following acoustic criteria:
  - A Sound Transmission Class (STC) rating of 25 or greater.
  - A minimum height of 14 feet above grade.

Figure 4: Proposed Temporary Barrier Placement

- This criterion can be achieved with standard 5/8-inch-thick plywood or purpose-made noise barrier blanket systems (which should be confirmed with the vendor before selection). The following installation and maintenance provisions shall also be followed:

    - If a modular panel or blanket-based system is selected, the contractor shall ensure that a minimum overlap of at least 4 inches exists between the barrier panels, so that no visible gaps or "acoustic leaks" are apparent along the barrier face, including its interface with the ground or foundational base (e.g., K-rail).

    - Barrier panel overlaps and overall conditions should be inspected visually by an environmental inspector or other on-site contractor before the start of construction every day. Such visual inspections should identify cracks or gaps appearing between the panels or barrier sections in apparent disrepair.

    - Purpose-made barrier panels often only provide acoustical absorption on one side and thus are directionally dependent. The contractor shall ensure that these barrier types are installed correctly (i.e., with the absorptive barrier face facing the construction area).

    - Temporary noise barriers shall be constructed at their designated locations prior to the operation of heavy equipment on site (except for those required for barrier installation).

- **BMP-9**: LABOE or its contractor will reduce short-term construction vibration by ensuring vibratory roller use will be restricted to distances of 20 feet or greater from any structure. If compaction is necessary within closer distances, hand-compaction techniques will be employed. Alternatively, a force-adjustable compaction device paired with a vibration monitoring program can be used.

- **BMP-10**: If archaeological resources are encountered during ground-disturbing activities, work will be temporarily halted in the vicinity of the find and LABOE will contact a qualified archaeologist to evaluate and determine appropriate treatment for the resource in accordance with the Public Resources Code (PRC) Section 21083.2(i). If any Native American cultural material is encountered within the project area, consultation with interested Native American parties shall be conducted by LABOE to apprise them of any such findings, solicit any comments regarding the significance of the find, and obtain any recommendations they may have regarding appropriate treatment and disposition of the resources.

- **BMP-11**: If human remains are discovered, work in the immediate vicinity of the discovery will be suspended and the Los Angeles County Coroner contacted. If the remains are deemed Native American in origin, the coroner will contact the Native American Heritage Commission (NAHC) and identify a Most Likely Descendant pursuant to PRC Section 5097.98, California Code of Regulations (CCR) Section 15064.5. Work may be resumed at the landowner's discretion but will only commence after consultation and treatment have been concluded. Work may continue on other parts of the project while consultation and treatment are conducted.

- **BMP-12**: Worker's Environmental Awareness Training. Prior to the start of construction, all field personnel should be provided training on the types of fossils that could be encountered and the procedures to follow should paleontological resources be found. This training shall be prepared by a qualified paleontologist, as defined by the 2010 Society of Vertebrate Paleontology Guidelines (SVP).

- **BMP-13**: Construction Monitoring. Prior to the start of construction, a qualified paleontologist will be retained to contribute to the preparation of a Paleontological Resource Monitoring and Management Plan for the Project. This Paleontological Resource Monitoring and Management Plan shall conform to the recommendations of SVP (2010). Full-time paleontological monitoring is recommended for all construction activities (e.g., excavation and trenching); however, the level of monitoring will be determined by the qualified paleontologist. This plan should include the sampling of sediments for microvertebrate fossils.

- **BMP-14**: Fossil Preparation, Curation, and Reporting. Upon completion of fieldwork, all significant fossils collected will be prepared in a properly equipped paleontology laboratory for curation. Following laboratory work, all fossil specimens will be identified and delivered to the Natural History Museum of Los Angeles County (NHMLA) (or another accredited museum) for permanent curation and storage. A final report should be prepared summarizing the results of monitoring.

Unless otherwise stated, the proposed project will be designed, constructed and operated following all applicable laws, regulations, ordinances and formally adopted City standards including but not limited to:

- City of Los Angeles Municipal Code

- Bureau of Engineering Standard Plans

- Standard Specifications for Public Works Construction (Greenbook), including Additions and Amendments

II. PROJECT HISTORY

The proposed project is a joint project between LABOE and LASAN. Compton Creek is a tributary of the Los Angeles River, both of which are considered impaired bodies of water pursuant to Section 303(d) of the federal Clean Water Act (CWA). Compton Creek is a tributary to the Los Angeles River and both watercourses are considered impaired water bodies according to the latest listing section 303(d) of the CWA. During low flows, existing box culverts (outfall LACC-155) and a 51-inch RCP (outfall LACC-154) feed into Compton Creek. Dry weather flow from these outfalls fluctuates from 0.01 to 0.06 cubic feet per second (cfs) with a median flow of 0.03 cfs. A hot spot occurs when these low flows stagnate and lead to excessive bacteria growth; this build-up of bacteria is what designates this outflow zone as an impaired body of water, per the CWA Section 303(d).

CWA Section 303(d) requires states to identify waters that do not meet or are not expected to meet by the next listing cycle, applicable water quality standards after the application of certain technology-based controls and register such waters for development of TMDLs. To address TMDLs, the City of Los Angeles led a stakeholder effort to develop CREST. The CREST identified load reduction strategies to focus on reducing bacteria from known “hot spots”. Later, the Upper Los Angeles River Enhanced Watershed Management Program for the Upper Los Angeles River Watershed developed the Compton Creek Load Reduction Strategy (LRS).

The LRS identified outfalls LACC-154 and LACC-155 as priority outfalls for Compton Creek. The proposed project would construct an LFD at priority outfall LACC-155 and outfall LACC-154 to redirect low flows to the City of Los Angeles sanitary sewer system that will be treated at Hyperion Water

Reclamation Plant. The proposed diversion facility would reduce high bacteria loading to the Los Angeles River to help the City meet bacteria TMDL compliance for the Los Angeles River.

The primary objectives of the proposed project are to:

- Effectively divert dry season flows from priority outfalls LACC-154 and LACC-155 into a nearby sewer force main to help the City of Los Angeles meet the bacteria TMDL compliance for the Los Angeles River in accordance with the Compton Creek LRS and CWA

- Improve the overall water quality of Compton Creek and the Los Angeles River

III. ENVIRONMENTAL REVIEW

A. Basis for Categorical Exemption

The proposed project is exempt from CEQA pursuant to State CEQA Guidelines Article 19, Section 15301, Class 1 (b) and (c), *Existing Facilities,* for the operation and minor alteration of existing public owned utilities, street, sidewalk, and mechanical equipment involving negligible expansion of existing or former use; and, Section 15302, Class 2 (c), *Replacement or Reconstruction,* for the replacement and reconstruction of existing utility systems and/or facilities located on the same site as the structure replaced and will have substantially the same purpose and capacity as the structure replaced because the proposed project would construct a diversion structure at outfall LACC-154 and LACC-155 to divert dry weather flows from the municipal storm drain system (MS4) to the sanitary sewer system with negligible expansion of existing use.

Additionally, this project is exempt from CEQA pursuant to the *Los Angeles CEQA Guidelines* Article III, Section 1, Class 1 (2) and (3), *Existing Facilities,* for the operation and minor alteration of publicly owned utilities and mechanical systems serving existing facilities involving negligible or no expansion of use; and, pursuant to Class 2 (3), *Replacement or Reconstruction,* for the replacement and reconstruction on existing utilities with negligible expansion of capacity because the proposed project consists of minor alternations of storm drain system within the City and LACFCD ROW with negligible expansion of existing use.

B. Consideration of Potential Exceptions to use of a Categorical Exemption

The State CEQA Guidelines (CCR Section 15300.2) limit the use of categorical exemptions in the following circumstances:

1. **Location.** Exemption Classes 3, 4, 5, 6, and 11 are qualified by consideration of where the project is to be located – a project that is ordinarily insignificant in its impact on the environment may be significant in a particularly sensitive environment. Therefore, these classes are considered to apply all instances, except where the project may impact on an environmental resource of hazardous or critical concern where designated, precisely mapped, and officially adopted pursuant to law by federal, state, or local agencies.

   This project is exempt from CEQA pursuant to State CEQA Guidelines Article 19, Section 15301 Class 1 (2) and (3), *Existing Facilities*, and Section 15302, Class 2 (3), *Replacement or Reconstruction*. Therefore, this exception does not apply.

2. **Cumulative Impact.** This exception applies when, although a project may not have a significant impact, the cumulative impact of successive projects of the same type in the same place, over time

is significant.

This project is one of many joint BOE and LASAN projects to construct LFD devices to divert dry weather flows from the MS4 to the sanitary sewer system to comply with the CWA in effort to reduce pollutant loads from impaired water bodies. While many other LFD projects have and are being constructed throughout the City of Los Angeles, they have been determined to be happening in different neighborhood locations and at different times. Furthermore, the diversion of dry weather flows into the sanitary sewer system are negligible in volume and would not overburden the public owned treatments works. Therefore, this exception has no application to this project.

3. **Significant Effect.** This exception applies when, although the project may otherwise be exempt, there is a reasonable possibility that the project will have a significant effect due to unusual circumstances.

Air Quality and Greenhouse Gas Emissions and Energy

The project construction is anticipated to occur between August 2025 through April 2027 and would require construction activities such as excavation and shoring, removal of existing facilities and construction of the LFD and diversion structures, mechanical and electrical construction, and disturbed facility replacement such as sidewalk, pavement, fencing and lane striping. It is anticipated that approximately 214 one-way haul truck trips would be required for material import/export associated with the 847 cubic yards of material excavation and 853 cubic yards of material fill (using a standard hauling truck capacity of 16 cubic yards). In addition, approximately 44 one-way haul truck trips for demolition materials and asphalt pavement removal would be required based on the estimated 15,246 square feet area of pavement to be removed. Based on the anticipated construction equipment quantities, approximately 3 to 10 construction workers (between 6 and 20 one-way trips) would be expected to be onsite daily.

To assess the proposed project's impact to air quality, greenhouse gas, and energy resources, an air quality, greenhouse gas emissions, and energy analysis technical memorandum (AQ Tech Memo) was prepared for the project. Findings from the AQ Tech Memo are summarized below.

Air Quality Impact Analysis

- IMPACT AQ-1: Would the project conflict with or obstruct implementation of the applicable air quality plan?

    - Construction: Construction of the proposed project would involve the use of off-road equipment, haul trucks, and worker commute trips. Construction activities would comply with the applicable SCAQMD rules and regulations, including Rule 401 (Visible Emissions), Rule 402 (Nuisance), Rule 403 (Fugitive Dust), and Rule 1113 (Architectural Coating) (for roadway striping activities), which are developed to implement Air Quality Management Plan (AQMP) control measures. As discussed in Section 8.2.1 of the AQ Tech Memo, the emissions from project construction activities would not exceed the SCAQMD regional and localized thresholds. Therefore, construction activities would not conflict with the applicable air quality plan. This impact would be **less than significant.**

    - Operation: The proposed project would not involve any uses that would increase population beyond that considered in the City of Los Angeles General Plan. Given the infrequent nature of operational and maintenance activities, the proposed project would

not exceed the assumptions used to develop the AQMP. As discussed in Section 8.2.2 of the AQ Tech Memo, emissions from project operational activities would not exceed the SCAQMD regional thresholds. Therefore, the proposed project would not conflict with or obstruct implementation of the applicable air quality plan. This impact would be **less than significant.**

- IMPACT AQ-2: Would the project result in cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard?

    - Construction: As shown in Table 8-1 of the AQ Tech Memo, construction-related emissions would not exceed the SCAQMD maximum daily thresholds of significance for any criteria pollutants. Consistent with SCAQMD Rule 403, the proposed project would implement typical BMPs during construction, such as appropriate dust-abatement measures to comply with SCAQMD Rule 401 (Visible Emissions), Rule 402 (Nuisance), Rule 403 (Fugitive Dust). In addition, as shown in Table 8-2 of the AQ Tech Memo, the peak daily localized construction emissions would not exceed the SCAQMD localized significance thresholds (LSTs). Therefore, construction activities would not exceed the SCAQMD regional and localized thresholds of significance. This impact would be **less than significant**.

    - Operation: As shown in Table 8-3 of the AQ Tech Memo, the proposed project's operational emissions would also not exceed the SCAQMD regional thresholds of significance. The proposed project would not generate any localized sources of emissions. Therefore, the construction and operation of the proposed project would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard. This impact would be **less than significant.**

- IMPACT AQ-3: Would the project expose sensitive receptors to substantial pollutant concentrations?

    - Criteria Air Pollutants – Construction and Operations: As shown in Tables 8-1 and 8-3 of the AQ Tech Memo, construction and operational activities would result in emissions of criteria air pollutants, but at levels that would not exceed the SCAQMD regional thresholds of significance. In addition, as shown in Table 8-2 of the AQ Tech Memo, the proposed project's localized emissions would not exceed the SCAQMD LSTs.

    - Toxic Air Contaminates – Construction and Operations: The greatest potential TAC emissions would be related to diesel PM emissions associated with activity by heavy-duty construction equipment. The total duration of construction activities is anticipated to be approximately 20 months; the exposure of sensitive receptors to construction emissions would be intermittent, short-term, and temporary in nature. As shown in Table 8-2 of the AQ Tech Memo, construction-related PM2.5, which includes diesel PM emissions, would be substantially below the localized thresholds of significance. Given the construction schedule, intermittent activities and the highly dispersive nature of diesel PM emissions, construction of the proposed project would not expose sensitive receptors to substantial TAC concentrations that could cause short- or long-term health effects. In addition, TAC emission exposure would also be reduced with the implementation of CARB regulations, such as the Airborne Toxic Control Measure, which limits idling of diesel-fueled

commercial motor vehicles. Therefore, the proposed project would not result in an increase in TAC emissions beyond existing conditions and would not expose sensitive receptors to substantial pollutant concentrations. This impact would be **less than significant.**

- IMPACT AQ-4: Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

    - Construction activities associated with the proposed project could result in short-term odor emissions from diesel exhaust associated with construction equipment and the application of asphalt. The proposed project would utilize typical construction techniques, and the odors would be typical of most construction sites and temporary in nature. The proposed project operations would not include any land uses identified by the SCAQMD as being associated with the generation of objectionable odors. Therefore, this impact would be **less than significant.**

Greenhouse Gas Emissions (GHG) Impact Analysis

- IMPACT GHG-1: Would the project generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?

    - Heavy-duty off-road equipment, materials transport, and worker commutes during construction of the proposed Project would result in exhaust-related GHG emissions. The operation of the proposed project would also generate GHG emissions associated with site operations, including energy (electricity consumption) and mobile (operational and maintenance vehicle trips) sources. As shown in Table 9-1 of the AQ Tech Memo, construction-related and operational emissions of the proposed project would not exceed SCAQMD's adopted significance threshold, the adjusted SB 32 threshold, nor the SCAQMD annual thresholds. Therefore, this impact would be **less than significant.**

- IMPACT GHG-2: Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs?

    - The proposed project would not conflict with an any applicable plans, policies, or regulations adopted for the purpose of reducing GHG emissions. This impact would be **less than significant.**

Energy Impact Analysis

- IMPACT E-1: Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

    - Construction: Based on the anticipated off-road equipment usage, haul truck trips and worker trips, it is estimated that construction activities would require approximately 41,171 gallons of diesel and 4,179 gallons of gasoline. Due to the anticipated phasing of the proposed Project, anticipated equipment and construction work staff, temporary nature of construction, and project type, the proposed project would not include unusual characteristics that would necessitate the use of construction equipment that is less energy-efficient than at comparable construction sites. Therefore, this impact would be **less than significant**.

- Operation: Energy consumption associated with operation of the proposed Project is limited to the electricity usage for pump operations as well as the transportation energy usage for maintenance vehicle trips. The pump is anticipated to require approximately 26,280 kWh per year to operate the proposed LFD. The maintenance vehicle trips are estimated to be approximately 338 gallons of gasoline per year. Routine maintenance of the pump and LFD system would be performed to ensure that the LFD is operating efficiently, which conserves energy by ensuring that the system operates at peak efficiency levels, minimizing energy waste and prolonging the lifespan of the equipment. Therefore, energy consumption associated with construction and operation of the proposed project would not be inefficient, wasteful, or unnecessary. This impact would be **less than significant.**

- IMPACT E-2: Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

    - The proposed project does not use land otherwise slated for renewable energy production and does not otherwise conflict with any state or local renewable energy plans. Therefore, the proposed project's construction would not obstruct any state or local plans for renewable energy and would conform with state and local plans for energy efficiency. This impact would be **less than significant.**

Biological Resources

The proposed project is located in a developed urban setting surrounded by multiple uses, including commercial, industrial, residential, school, religious, and public service (fire station) uses. While the project area includes various street trees, the project design does not involve the removal or pruning of any trees or shrubs. A search of the California Department of Fish and Wildlife (CDFW) Biogeographic Information and Observation System (BIOS) California Natural Diversity Database (CNDDB) was performed on November 19, 2024, using a 1-mile search radius identified no recent findings of any federal or state listed species.

Based on the above, there is no reasonable possibility that the proposed project will have a significant effect due to unusual circumstances. Therefore, this exception has no application to this project.

Cultural Resources

To assess the proposed project's impact to cultural resources during construction activity, a cultural resources assessment (Cultural Memo) was prepared for the proposed project. The cultural resources study consisted of archival research, a Native American Heritage Commission (NAHC) Sacred Lands File (SLF) search, a Native American Contact Program, and a pedestrian survey of the project area. Findings of the Cultural Memo is summarized below.

A records search was undertaken at the South Central Coastal Information Center (SCCIC) housed at California State University, Fullerton, on March 7, 2024. The records search focused on the identification of previously recorded archaeological site records and reports; Built Environment site records, inventories, and reports; and historic maps within a 0.25-mile radius of the project area.

- Previously Recorded Cultural Resources at SCCIC

  The records search at SCCIC did not identify any previously recorded archaeological resources or Built Environment resources within the 0.25-mile radius of the project area.

- California Historical Landmarks

  California Historical Landmarks are buildings, structures, sites, or places that have been determined to have statewide historical interest. A search of the California Historical Landmarks list revealed no California Historical Landmarks within the 0.25-mile study area.

- Built Environment Resource Directory

  The BERD is an inventory of Built Environment resources maintained by the Office of Historic Preservation. The BERD is organized by street; therefore, only the project area streets (E 107th Street, Main Street, and East 108th Street) were reviewed. This review identified no BERD resources within or adjacent to the project area.

- Los Angeles Historic Resources Inventory (HistoricPlacesLA)

  As part of this investigation, a search of the Los Angeles Historic Resources Inventory (HistoricPlacesLA) was conducted. HistoricPlacesLA contains information on Los Angeles Historic- Cultural Monuments, HPOZs, and properties identified as eligible for designation for listing in NRHP, CRHR, Historic Cultural Monument, or a HPOZ through the Los Angeles Historic Resources Survey, known as SurveyLA. The search identified no cultural resources adjacent to or within the project area.

- Sacred Lands File Check

  An SLF search was conducted by the NAHC to identify any Native American cultural resources that may be within the project area. A letter was prepared and emailed to the NAHC on March 1, 2024, which described the project, provided the project location, and requested an SLF check for the project area. The NAHC responded by email on March 15, 2024, with “negative results” for the SLF search but noted that the lack of specific site information in the SLF is not an indication that Native American cultural resources are absent from the project area

- Field Survey

  The purpose of the survey was to identify and record archaeological resources that are at least 45 years old and evaluate any discovered resources for historical significance based on criteria for listing in the CRHR.

  The archaeological field survey of the project area was conducted on August 27, 2024. During the archaeological survey no archaeological resources were observed however, one Built Environment resource, the Compton Creek Channel, was observed and assessed. The purpose of the review and the analysis was to identify and record the Built Environment resources in the project area that are at least 45 years old and to evaluate them for historical significance under NRHP, CRHR, and local register criteria.

- Historic-Age Built Environment Descriptions and Evaluations

  Under NRHP Criterion A or CRHR Criterion 1, this segment of the Compton Creek from Main Street to Wall Street is associated with the planning, development, and construction of the greater Compton Creek channel, a tributary of the Los Angeles River. The 8.5-mile Compton Creek channel as a whole reflects USACE and Los Angeles County Flood Control District's flood control efforts in the area. Compton Creek is one of many tributaries of the Los Angeles River, and this segment is one of the later channelized sections of Compton Creek. Therefore, this segment of Compton Creek (from Main Street to Wall Street) is not eligible for the NRHP/CRHR under Criterion A/1 as an individual resource or as a contributor to a larger significant linear resource (National Park Service 2012).

  Under NRHP Criterion B or CRHR Criterion 2, the evaluated portion of the Compton Creek has no significant association with the lives of persons important to national, state, or local history. Important people that may be associated with the channel segment are likely to be master engineers, which is more appropriately associated with significance under Criterion C. There may be instances, however, when a water conveyance system would be eligible under Criterion B, notably when the person's association with the system is very strong and no properties more intimately associated with that person remain. Research did not reveal that the subject segment is associated with any notable persons associated with water, planning, construction, or engineering in California. The evaluated segment was designed by USACE as part of the larger Compton Creek channelization project, and no associations with prominent people associated with the USACE design of the river channel were identified. Therefore, the segment of Compton Creek (from Main Street to Wall Street) is not eligible for the NRHP/CRHR under Criterion B/2 as an individual resource or as a contributor to a larger significant linear resource.

  Under NRHP Criterion C or CRHR Criterion 3, the evaluated portion of the Compton Creek does not embody the distinctive characteristics of a type, period, region, or method of construction, or represent the work of a master, or possess high artistic value and therefore, it is not eligible for the NRHP/CRHR under Criterion C/3 as an individual resource. The evaluated segment also is not eligible for the NRHP/CRHR under Criterion C/3 as a contributor to a larger significant linear resource. The Compton Creek from Main Street to Wall Street is similar to many other segments of the channel in design and construction.

  Under NRHP Criterion D or CRHR Criterion 4, this resource is not significant as a source (or likely source) of important information regarding history. It does not appear to have any likelihood of yielding important information about historic construction materials or technologies.

  In conclusion, the segment of Compton Creek from Main Street to Wall Street has not been substantially altered since it was channelized between 1948 and 1952, and it retains its historic integrity. However, the subject segment does not possess sufficient significance to be eligible for listing in the NRHP/CRHR either individually or as a contributing resource to a larger significant cultural resource if it is ever determined that such a resource exists. Therefore, impacts to historical resources would be **less than significant**.

- Archaeological Sensitivity

  The archaeological sensitivity of the project area was evaluated through a comprehensive records search and an examination of the area's historical context and past ground disturbances. This review indicates a long history of use by the Gabrielino people in the broader region. However, there is no evidence suggesting that this specific site was linked to any trade networks or settlements.

  Historically, the area transitioned from agricultural and ranching activities to a center of commercial and industrial development, followed by substantial urbanization.

  The records search, which covered a 0.25-mile radius, did not reveal any prehistoric cultural resources, and the resources identified within the project area were limited to historic-age Built Environment. The soils in the region are of Holocene age, typically associated with heightened archaeological sensitivity. Nevertheless, extensive ground disturbance has occurred, as documented in historical aerial photographs, topographic maps, and other research.

  While there remains a possibility of undiscovered prehistoric and historic-era archaeological resources within the project area, it is likely that any such deposits have been compromised due to the area's extensive history of construction. Consequently, the archaeological sensitivity of the project area is considered low. However, there is potential to encounter previously undiscovered archaeological resources during construction activities. If archaeological resources are encountered during ground-disturbing activities, per BMP-10, work will be temporarily halted in the vicinity of the find and LABOE will contact a qualified archaeologist to evaluate and determine appropriate treatment for the resource in accordance with PRC Section 21083.2(i). Therefore, impacts to archaeological resources would be **less than significant**.

- Tribal Cultural Resources and Human Remains

  No previously identified archaeological resources associated with Native American culture have been identified within the project area, and no documented tribal cultural resources were identified as a result of archival research and the Native American Contact Program. However, it is possible that buried cultural resources that may rise to the significance of tribal cultural resources may exist within the project area.

  If any Native American cultural material is encountered within the project area, per BMP-10, consultation with interested Native American parties should be conducted to apprise them of any such findings, solicit any comments regarding the significance of the find, and obtain any recommendations they may have regarding appropriate treatment and disposition of the resources.

  If human remains are discovered, per BMP-11, work in the immediate vicinity of the discovery will be suspended and the Los Angeles County Coroner contacted. If the remains are deemed Native American in origin, the coroner will contact the NAHC and identify a Most Likely Descendant pursuant to PRC Section 5097.98, CCR Section 15064.5. Work may be resumed at the landowner’s discretion but will only commence after consultation and treatment have been concluded. Work may continue on other parts of the project while consultation and treatment are conducted.

Therefore, impacts related to tribal cultural resources and human remains would be **less than significant**.

Noise and Vibration

The City of Los Angeles defines single- and multi-family residences as noise-sensitive land uses. The nearest residential dwellings are approximately 18 feet northeast and 121 feet southeast of the extents of project construction activities. *See Figure 5: Land Use Overview and Sensitive Receiver Location.* Noise due to construction is regulated under Section 41.40 of the City Code which prohibits construction noise between the hours of 9:00 p.m. and 7:00 a.m. Monday through Friday, 6:00 p.m. and 8:00 a.m. on Saturday, and all day on Sunday and national holidays. In addition, Section 112.05 of the City Code limits noise from construction equipment located within 500 feet of a residential zone to 75 A-weighted decibels (dBA) (between the hours of 7:00 a.m. and 10:00 p.m.), measured at a distance of 50 feet from the source, unless compliance with this limitation is technically unfeasible. The proposed project's construction activities would generally occur Monday through Friday between the hours of 7:00 a.m. and 4:00 p.m. and would not occur on weekends or national holidays.

To assess the proposed project's impact to noise resources during construction and operation activity, a noise and vibration technical memorandum (Noise Tech Memo) was prepared for the Project.Findings of the Noise Tech Memo is summarized below.

Noise Impact Analysis

- Construction: As shown in Table 4 of the Noise Tech Memo, project activities are expected to result in exceedances of the City Code (65 dBA, based on the measured 60 dBA baseline sound level at both receptors) at both studied receptors for the following construction phases: excavation and shoring; storm drain diversion and underground structures; and site civil, fencing, and cleanup. To reduce predicted project construction noise levels to below City Code limits, the proposed project would implement BMP-8, which would entail temporary construction noise barriers on the north side of Compton Creek. As shown in Table 5 of the Noise Tech Memo, with implementation of BMP-8, the project construction noise level would be reduced to below 65 dBA, Leq at both studied closest receptors. Therefore, noise impacts associated with construction activity of the proposed project with noise barriers would not exceed City Code thresholds with implementation of BMP-8. This impact would be **less than significant.**

- Operation: The proposed project does not include installation of any noise-generating or vibration-generating elements that would be perceptible at any land use. One submersible pump will be installed as part of the proposed project, which will not generate audible noise at receptor areas on account of its submerged and below-grade operation. Site maintenance visits would not require any significant vibratory sources or operation of noise-intensive equipment (e.g., vacuum trucks). Therefore, **no impact** would occur from project operational and maintenance activities.

N	Date Created: 03/07/2024	**Figure 2**
	Created by: DMB	**Land Use Overview and Sensitive Receiver Locations**
AECOM Delivering a better world Acoustics & Noise Control Practice		**Compton Creek Low Flow Diversion Project** **Los Angeles, CA**

Figure 5: Land Use Overview and Sensitive Receiver Locations

Vibration Impact Analysis

- Construction equipment vibration levels were assessed for potential structural damage at adjacent structures using the Caltrans Transportation and Construction Vibration Guidance Manual (2020 Caltrans Manual) vibration prediction equation. Vibration-intensive equipment is not proposed for operation during evening and nighttime hours and therefore, vibration levels at the nearest residential receptors were not assessed.

  The proposed project would require the use of heavy construction equipment such as a backhoe, loader, excavator, and vibratory roller. Equipment vibration levels will generally range from 0.076 (generated by loaded trucks) to 0.21 PPV (generated by vibratory rollers) at a reference distance of 25 feet. Groundborne vibration from construction would be limited to the permitted daytime hours of 7:00 a.m. to 7:00 p.m. and would not occur during evening nighttime hours when residents are typically resting or sleeping. However, as discussed in Section 8.2 of the Noise Tech Memo, it is anticipated that exceedances of Caltrans Manual guidance vibratory limits could occur during operation of the proposed vibratory rollers in the vicinity of structures along the west side of Main Street. However, the proposed project would implement BMP-9, which requires vibratory roller use to be restricted to distances of 20 feet or greater from any structure. If compaction is necessary within closer distances, hand-compaction techniques will be employed. Alternatively, a force-adjustable compaction device paired with a vibration monitoring program can be used. With implementation of BMP-9, construction vibration impacts would be **less than significant**.

Paleontological Resources

To assess the proposed project's impact to paleontological resources during construction activity, a paleontological assessment (Paleo Memo) was prepared for the proposed project. Findings of the Paleo Memo is summarized below.

Resource Inventory Results

- Geologic Mapping

  The most detailed geologic mapping of the area is that of Dibblee and Minch (2007) at a scale of 1:24,000. That geologic map shows the site as lying within a Quaternary unit designated Qa, which indicates for "alluvial gravel, sand, and clay, derived mostly form Santa Monica Mountains; includes gravel and sand of minor stream channels." It is assigned a Holocene age. However, the map unit Qoa (older alluvium of gray to light brown pebble-gravel, sand, and silt-clay, elevated and dissected) of Quaternary age occurs only a few feet southwest of the Project and is assigned a Pleistocene age. It is logical to assume that Qoa sediments underlie Qa sediments within the project area. It is not known at what depth Qoa sediments will be encountered. Thus, there are no formations involved in this study. There are only Quaternary sediments of various lithologies and ages.

- Literature Review

  None of the fossil localities listed in Jefferson 1991a were near to the Project. Jefferson 1991b lists VP 1225, VP 1295, VP 1755, and VP 1893, also covered in the records search (see below). Lander (2009) was consulted to verify details of the Natural History Museum of Los Angeles County (NHMLA) VP 7758 record.

- Records Search

  A paleontological records search was conducted on March 3, 2024 through an archival database search at the NHMLA. The result shows no fossil sites are known within the project area, but nine fossil sites are recorded within 7 miles of the project area.

  The following Quaternary fossil sites are discussed in the records search results:

  - Sites VP 1295, 1334, and 4206 lie approximately 2,662 feet to the southwest. Turtle, rodent, rabbit, canine, horse, bison, mammoth, and ground sloth fossils were recovered at unspecified depths. The surface sediments are mapped as Qoa (Dibblee and Minch 2007).

  - VP 1225 is less than a mile (3,180 feet) to the north northwest and were collected 15–20 feet bgs . A mammoth fossil was recovered there. The surface sediments are mapped as Qa (Dibblee and Minch 2007).

  - Site VP 3266 lies 1.40 miles to the south southwest. Unspecified vertebrate fossils were collected at 15–18 feet bgs. The surface sediments are mapped as Qoa (Dibblee and Minch 2007).

  - Site IP 2690 lies 1.75 miles to the east northeast. Marine mollusks, barnacles, and echinoids were collected there at an unknown depth. It lies slightly outside the Dibblee and Minch (2007) map, but the surface at this location would be mapped as Qa by extrapolation.

  - Site VP 7758 lies 4.75 miles to the north northwest. Stickleback and rodent fossils were collected at a depth of 16 feet bgs. The site lies slightly outside the Dibblee and Minch (2007) map, but the surface sediments are mapped as Qa by extrapolation. Contrary to the report of Bell (2024), the radiocarbon date on the mollusk fossils found with the vertebrate fossils was 2,360 to 2300 calendar years before present (BP) (Lander 2009). Thus, the age of these fossils corresponds with the dating assigned by Dibblee and Minch (2007).

  - Site IP 34956 lies 5.23 miles to the north northwest. Unspecified invertebrate fossils were collected at an unknown depth.

  - Site VP 1755 lies 6.66 miles to the north. A horse fossil was collected at 43 feet bgs.

  - Site VP 1893 lies 7 miles to the northwest. Bison and mammoth fossils were collected at an unrecorded depth.

  No pertinent localities were located in the search of the University of California Museum of Paleontology locality database.

- Synthesis

  Given the criteria for significant paleontological resources in the guidelines of the Society of Vertebrate Paleontology Guidelines (SVP) (2010), no organic remains in Qa sediments less than 5,000 calendar years BP would be significant. These sediments have a low potential for paleontological resources. Identifiable vertebrate fossils in Holocene Qa sediments older

than 5,000 calendar years BP would be significant. These sediments have a high potential for paleontological resources. Any identifiable vertebrate fossils in Qoa sediments would be significant. These sediments also have a high potential for paleontological resources.

Conclusions

The project area is mapped as occurring in Qa sediments (of Holocene age), but Qoa sediments (of late Pleistocene age) are deduced to lie beneath at a shallow depth. At other nearby sites mapped as Qa, (VP 1225 and IP 2690), Pleistocene fossils were recovered at 15–20 feet and at an unknown depth, respectively. There is a probability of significant fossils being encountered during earth-moving activities on the project site. In the event of an unanticipated fossil discovery, BMP-12 through BMP-14 will be implemented to reduce any potentially significant impacts to less-than-significant levels, pursuant to CEQA**.** The BMPs described in Section I of this document are sufficient to ensure that any potential impacts to archaeological resources that may be present in the project site are **less than significant**.

Traffic and Transportation

The project site is located on the east side of Main Street between 108th Street and 107th Street in the City of Los Angeles. Main Street runs north to south with a curb-to-curb width that varies from 53’ to 63’ within the Project limits and has a posted speed limit of 30 miles per hour. The existing layout is comprised of a bike lane and through lane in each direction with a two-way-left turn lane or left turn pocket in the middle. Street parking is permitted along the northbound direction on Main Street within the project limits and along the southbound direction only from 107th to 106th Street.

A single construction stage is proposed for the demolition of interfering facilities and the construction of the LFD, diversion structure, and mainline utility. The proposed 217’ x 27’ work area is situated on the northbound side of Main Street between 108th and 107th Street and will encompass the existing northbound through lane, existing northbound bike lane, existing northbound parking lane, and sidewalk on the east side of Main Street. An alternate laydown area for construction materials and vehicles is designated adjacent to 108th Street between the alley access to the creek and the access gate to the auto shop at the northeast corner of 108th Street.

The traffic control layout proposes temporary striping to implement a temporary configuration comprising of one 11’ through lane in both the northbound and southbound directions and a bike lane of varying width for each direction. Northbound traffic is shifted 25’ to the west using a curve-tangent-curve to accommodate the work area on Main Street between 108th Street and 107th Street and then shifted back to the east to tie-in with existing lanes. The proposed curve-tangent-curve design minimizes the traffic control footprint in comparison to a straight transition and makes it feasible to maintain both the left turn pocket at 109th Street and the two-way left turn lane on 106th Street. However, the southbound left turn pocket at 109th street is reduced from 90’ to 70’ and the northbound two-way left turn lane at 106th is reduced from 121’ to 30’. Temporary No Parking zones are proposed at locations where the temporary striping and proposed work area conflicts with existing parking.

To assess the proposed project’s impact to traffic resources during construction activity, a traffic impact analysis (Traffic Memo) was prepared for the the proposed project. Findings of the Traffic Memo is summarized below.

Vehicle Miles Traveled (VMT)

- On September 27, 2013, Senate Bill (SB) 743 was signed, with the purpose of streamlining review under the CEQA for several categories of development projects, including the development of infill projects in transit priority areas. SB 743 also intends to balance the needs of congestion management with state-wide goals related to infill development, promotion of public health through active transportation, and reduction of GHG emissions. SB 743 mandates that Vehicle Miles Traveled (VMT) replace vehicle delay and Level of Service (LOS) as the most appropriate metric for determining transportation impacts under CEQA. The CEQA Guidelines support these goals by establishing VMT as the primary metric for evaluating a project's impact on the environment and transportation system.

- The proposed project would construct underground low flow diversion structures to divert storm drain flows to the sanitary sewer system during dry weather that would have otherwise discharged to Compton Creek in the City of Los Angeles. Per CEQA Guidelines, Section 15064.3(b), a significant transportation impact would occur if a project generates a net increase of 250 or more daily trips, or results in a net increase in VMT. Due to the project not being a traditional development project, there is no permanent net increase in trip generation as a result of implementation of the project. The only proposed trips associated with the project are trips related to construction activities, which would be temporary trips on the roadway system. The number of trips on the roadway and VMT would return to pre-project conditions after project completion. Therefore, **the proposed project would not cause a significant impact related to VMT**.

  Consistency with Program, Plan, Ordinance or Policy Addressing the City of Los Angeles Circulation System

- Generally, there are no anticipated long-term traffic impacts after project completion. Upon completion of the proposed project, there will be no permanent modifications to the existing lane configuration or transit, bicycle and pedestrian facilities. The only permanent modification to the roadway is approximately 32 feet of new proposed red curb in front of the creek entrance to provide maintenance access to the LFD structures. This will result in the loss of one on-street parking space. There are no project features that conflict with a program, plan, ordinance, or policy addressing the circulation system of the City of Los Angeles, including transit, roadway, bicycle, and pedestrian facilities. **No impact would occur**.

Emergency Access and Hazards from Geometric Design Features

- The project proposes to temporarily shift the northbound travel lane west using standard reverse curves. No new driveways or vehicle access points, modifications to the public ROW, or incompatible uses are proposed. As a result, the project is not anticipated to substantially increase hazards to road users from geometric design features. Additionally, the proposed project would not result in inadequate emergency access by emergency response vehicles. There is an existing fire station on the southwest corner of Main Street and 108th Street, with emergency vehicle access points located on both Main Street and 108th Street. Both streets also have existing overhead flashing beacon equipment to help give emergency response vehicles priority during emergencies. The proposed temporary traffic control design for the project prioritizes emergency vehicle access. Therefore, the proposed project would not result in inadequate emergency access or result in hazards from geometric design features. **No impact would occur**.

4. **Hazards and Hazardous Materials – Hazardous Waste**

   As of October 2, 2024, the State Department of Toxic Substances Control (DTSC) Envirostor has not listed the project site or any contaminated sites near the project area (within 1,000 feet). Additionally, as of October 2, 2024, the California Regional Water Quality Control Board (RWQCB) Geotracker database has not listed the project site or any contaminated sites near the project area (within 1,000 feet). Therefore, this exception has no application to this project.

   Therefore, this exception has no application to this project.

5. **Scenic Highway.** A categorical exemption shall not be used for a project which may result in damage to scenic resources, including but not limited to, trees, historic buildings, rock outcroppings, or similar resources, within a highway officially designated as a state scenic highway.

   Based on a review of the California Department of Transportation's California State Scenic Highway System Map, the proposed project is not within a state designated scenic highway or within sight of any state designated scenic highway. Therefore, this exception has no application to this project.

6. **Hazardous Waste Site.** This exception applies when a project is located on a site listed as a hazardous waste site under Government Code Section 65962.5.

   As of October 2, 2024, the project site was not listed as a hazardous waste site. Therefore, this exception has no application to this project.

7. **Historical Resources.** This exception applies when a project may cause a substantial adverse change in the significance of a historical resource.

   This project will occur within areas previously disturbed by grading and installation on the existing roadway, curbside, and roadway. Encountering cultural resources is not anticipated; however, there is still a potential to inadvertently encounter previously unknown archaeological resources during excavation and trenching activities associated with the proposed project. The proposed project will implement BMPs as described previously in Section I of this NOE, to protect archaeological, cultural, or paleontological resources. Therefore, no substantial adverse impact to cultural resources is anticipated, and as such this exception does not apply.

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